



**GREEK NATIONAL COMMISSION FOR HUMAN RIGHTS**

**Report on the status of Women in Greece**



**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 plenary consists of a total of 20 members designated by independent authorities, trade union organisations, civil society organisations, higher and research institutions.*

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**GLOSSARY**

GGDOPI	General Secretariat for Demography and Family Policy and Gender Equality
GGIAD	General Secretariat for Equality and Human Rights
GNCHR	Greek National Commission for Human Rights
(ESAmE)	Greek National Confederation of Persons with Disabilities
ESDDP	National Action Plan for the Rights of the Child
ESDIF	National Action Plan for Gender Equality
EIGE	European Institute for Gender Equality
LGBTQI	Lesbian, Gay, Bisexual, Transgender, Queer, Intersex
NGOs	Non-governmental Organisations
SYD	Greek Transgender Support Association
CC	Criminal Code
CEACR	Committee of Experts on the Application of Conventions and Recommendations
CEDAW	Convention on the Elimination of All Forms of Discrimination against Women
COBs	Concluding Observations
CRC	Convention on the Rights of the Child
EIGE	European Institute for Gender Equality
GREVIO	Group of experts on Action against violence against Women and domestic violence
ILO	International Labour Organization

## Report on the Status of Women in Greece\*

### PRELIMINARY OBSERVATIONS

#### i) The role and mission of the GNCHR

The [Greek National Commission for Human Rights](#) (GNCHR), the **independent advisory body to the Greek State on matters pertaining to the protection of Human Rights** and the **National Human Rights Institution** (NHRI) in Greece, was established by [Law 2667/1998](#), in accordance with the [Paris Principles](#) adopted by the [United Nations General Assembly](#) A/RES/48/134, 20.12.1993, “*National Institutions for the promotion and protection of human rights*” (NHRIs)

The first President of the GNCHR was the dearly departed Alikì Yiotopoulou - Maragopoulou, President of the Marangopoulos Foundation for Human Rights (MFHR) and a great defender of women's rights in our country, who significantly contributed to the drafting of the founding Law of the GNCHR (Law 2667/1998) in accordance with the Paris Principles. The MFHR has consistently been represented in the composition of the National Commission. After more than 20 years, the founding legislation of the GNCHR was amended by [Law 4780/2021](#), the provisions of which now govern its operation. The current President of the GNCHR, Professor Maria Gavouneli, who was designated by the Greek League for Women's Rights, also contributed to the amendment of the National Commission's legislation, as it was during her first term of office (2019-2022) that the step towards the independence and autonomy of the GNCHR was taken. Under the provisions of [Law 4780/2021](#) the GNCHR has acquired legal personality, operational and financial independence and administrative autonomy. Since 2001, the GNCHR has been accredited with A status (full compliance with Paris Principles), by the competent GANHRI Sub – Committee on Accreditation (SCA), an indicative fact of its independence and efficient fulfilment of its role.

According to its founding Law, the main mission of GNCHR consists of:

- constantly **monitoring** matters pertaining to human rights protection, **informing** the public and promoting research in this connection
- providing **advice** to the Government, Parliament and other public authorities on legislative, policy and administrative measures affecting human rights
- **exchanging experience** at international and European level with competent international organisations, such as the UN, the Council of Europe, the European Union, the OSCE as well

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\* The initial text was adopted by the Plenary Assembly of the GNCHR on 18 January 2024 and was reviewed in 2025. Rapporteurs: Professor Maria Gavouneli, President of the GNCHR and Katerina Charokopou, Legal/Research Officer of the GNCHR

as with the corresponding **National Institutions** of other countries and with the Civil Society, and

- formulating **policy proposals** on matters related to its scope of work
- **fostering** a culture of respect for human rights through educational activities and awareness-raising and information campaigns.

More specifically, in the context of its mission, the GNCHR bears the responsibility for **constantly highlighting to all State institutions** the need for the effective safeguarding of human rights, informing public opinion about the risks associated with their violation **and, above all, providing advice to the Greek State** for the formulation of a proper central policy on issues pertaining to human rights.

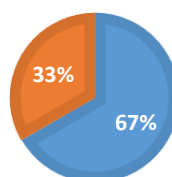
An additional guarantee of the **GNCHR** independence is its **pluralistic and polyphonic composition**, enabling it to foster a unique dialogue between the various stakeholders of civil society and the State. **Its Plenary consists of a total of 20 members** designated by Independent Authorities, Trade Unions, Human Rights Organisations, Higher Education Institutions, Research Institutions, Bar Associations. Among the **National Commission's liaison officers are representatives of the political parties sitting in the Hellenic Parliament** and the Ministries, about 30 in total. An equal number of alternates are appointed for both regular members and liaison officers.

Women in the GNCHR:



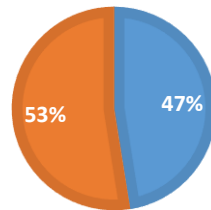
#### GNCHR BOARD

■ Women ■ Men



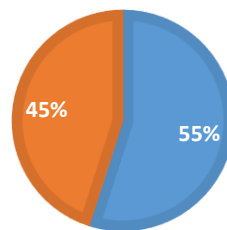
### GNCHR PLENARY

■ Women ■ Men



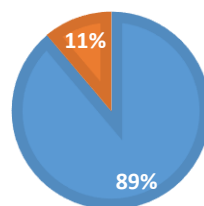
### GNCHR LIAISON OFFICERS

■ Women ■ Men



### GNCHR STAFF

■ Women ■ Men



The GNCHR also contributes with its Observations to the Reports submitted by Greece during the periodic review of the country's implementation of the international commitments undertaken by the ratification of international human rights instruments, and in addition, **it submits its own independent Reports.**

In fact, the GNCHR, as the guardian of human rights at international, regional and national level, acts as a **bridge builder** between the State and Civil Society, and between the country's international commitments to the implementation of human rights and the effective enjoyment of human rights in practice.



The GNCHR, in the context of its dual role as the independent advisory body of the Greek State and the National Human Rights Institution, has been closely monitoring **gender equality issues since its establishment**, attaching utmost importance to the protection of women's rights and the fight against gender discrimination.<sup>1</sup> In addition to **monitoring the gender equality dimension in all its aspects**, the National Commission has particularly focused on the issues of **domestic violence, family relationships**, the protection of women's **labour rights**, their equal participation in **political and public life**, while intertemporal and in-depth attention is paid to gender equality issues with regard to **categories of women with additional vulnerability**, such as migrant/refugee women, women with disabilities, Roma women, elderly and LGBT women.<sup>2</sup> At the same time, the **GNCHR is working constantly to eliminate gender discrimination** and empower women in the public and private sectors, to combat gender and domestic violence, and to support all vulnerable groups of women.<sup>3</sup>



The **pluralistic nature of the GNCHR** composition is real proof of its role and contribution to the restoration and consolidation of women's equal treatment in the exercise of all their economic, social, cultural, civil and political rights, with the aim of achieving substantive equality. It should be noted that the President of the current term of office of the GNCHR (2022-2026), is designated by one of the oldest women's organisations in Greece, the **Greek League for Women's Rights designating members** with voting rights to the Plenary of the GNCHR. Furthermore, it is stressed that the GNCHR's Plenary includes, among other members with voting rights, a person appointed jointly by the **Greek Transgender Support Association (SYD)**, the **Athens Pride Festival**, the **Homosexual and Lesbian Community of Greece (OLKE)**, **COLOUR YOUTH - Community of LGBTQ** and **Rainbow Families**.

**Awareness raising activities, public debates, educational activities and seminars, including trainings for professionals and courses at universities and schools, carried**

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<sup>1</sup> See GNCHR website: Decisions-Positions [GENDER EQUALITY](#).

<sup>2</sup> The term LAT Women (LBTI Women) is used by GREVIO in the [Evaluation Report on Greece](#), paragraphs 16, 18, 34, 137, 172, 14 November 2023,

<sup>3</sup> See the GNCHR Press Releases on the International Women's Day, for the elimination of violence against women. See the recent [GNCHR Press Release](#) on the International Women's Day: The elimination of gender discrimination cannot wait, 8 March 2023.

out on a regular basis by the GNCHR, are also **key tools for highlighting the situation of women's rights in Greece**, in order to foster a culture of respect for rights, as mentioned above. The GNCHR, in the framework of its institutional role, **interacts** regularly with **institutional bodies and prominent figures** in politics, science and society on topical human rights protection issues, such as **gender equality, the work-life balance, the promotion of women in positions of power, and the fight against gender discrimination and violence**, in order to identify gaps, debate with focus on specific points and suggest appropriate solutions. The GNCHR makes use of other complementary tools (**hearings of persons and stakeholders, bilateral contacts, cooperation with academic institutions, field research**, etc.), with a further focus on more **specific areas of interest**, such as **women with multiple vulnerabilities** (persons with disabilities, LGBT women, Roma women, refugee/migrant women), **women and health, women and environment, women and the achievement of sustainable development goals**. In any event, the knowledge and **expertise that the National Commission brings to the promotion and protection of human rights** can contribute in a practical way to the promotion and implementation of substantive gender equality.



## **ii) Contribution of the GNCHR to the monitoring of the country by regional and international bodies**

Over the last few years, the GNCHR has made the following Observations in the context of the monitoring of Greece's compliance with its international commitments:

- Observations by the GNCHR on the implementation of the Convention on the Elimination of All Forms of Discrimination against Women following the drafting of the list of issues (CEDAW), 2 January 2024
- [Observations by the GNCHR on State's draft reply to the list of issues prior to the submission of the combined Eighth and Ninth Periodic Report under the Convention on the Elimination of Discrimination against Women \(CEDAW\), 9 April 2023](#)



- Observations by the GNCHR on the 5th National Report on the implementation of the Revised European Social Charter (Reference Period 01/01/2017 - 31/12/2020) (ESC), 11 January 2023
- Observations on Greece's combined 23rd and 24th periodic report to the Committee on the Elimination of Racial Discrimination (CERD) of the International Convention on the Elimination of All Forms of Racial Discrimination (CERD), 28 September 2021
- Submission to the United Nations Human Rights Committee on the List of Issues Prior to Reporting for the Third periodic examination of Greece under the International Covenant on Civil and Political Rights (ICCPR), 24 September 2021
- Oral Statement of the Greek National Commission for Human Rights (GNCHR) on the implementation of the Convention on the Elimination of All forms of Discrimination against Women (CEDAW) in Greece (CEDAW), 11 November 2020
- Information relevant to the implementation of the Convention on the Elimination of all forms of Discrimination against Women – CEDAW prior to the drafting of the list of issues (CEDAW), 21 October 2020
- Written Information submitted by the Greek National Commission for Human Rights (GNCHR) in relation to the implementation of the International Convention on the Elimination of all forms of Racial Discrimination (ICERD) in Greece, 11 July 2016.

In all the above mentioned reports of the GNCHR, comments and proposals are included for the effective incorporation of the principle of gender equality in all areas and levels of social life, as well as for the effective protection and application of women's rights enshrined in the *United Nations Convention on the Elimination of Discrimination against Women*, with particular emphasis put on vulnerable groups of women. Emphasis on the protection of vulnerable groups of women is also given in the 2024 *Concluding Observations of the UN Committee on the Elimination of All Forms of Discrimination against Women* (hereinafter referred to as the *CEDAW Committee*). Expressing concern, the *CEDAW Committee* urges the State to take both immediate interim measures to accelerate the achievement of substantive equality for vulnerable groups of women and individual specific measures to improve their status in general.<sup>4</sup>

Additionally, in the context of the **general task of monitoring the compliance of the competent State authorities with international, regional and national human rights standards**, the GNCHR intervenes publicly with statements, communications, etc. where it

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<sup>4</sup> See [CEDAW/C/GRC/CO/8-9](#): Concluding Observations on the combined eighth and ninth periodic reports of Greece, 20 February 2024, paragraphs 19 et seq

deems necessary and in accordance with the internal, democratic procedures provided for in its founding Law and its Regulation. Besides, the pluralistic composition of the GNCHR, which brings together persons of different backgrounds and views, with knowledge, expertise in human rights and independent opinion, creating a mini-society, guarantees that issues are addressed comprehensively, following fruitful discussions, where all positions come under consideration and, when a broad consensus is reached, are subsequently adopted and published:

[Effective protection against violence against women](#), July 1, 2024

[GNCHR Statement on Femicides](#) , 5 April 2024

[GNCHR Statement on Turkey's withdrawal from the Istanbul Convention](#), 01 April 2021

[GNCHR Statement on the phenomena of sexual harassment and abuse in the context of exploitation related to power imbalances and abuse dynamics which have recently been reported in sport](#) , 21 January 2021

[Intervention by the GNCHR in the session of the Special Standing Committee on Equality, Youth and Human Rights of the Hellenic Parliament on: "Domestic violence in the time of the coronavirus: Women organisations share their experience"](#) , May 22, 2020.



In June 2021, special emphasis was placed by the GNCHR on the ratification of *ILO Convention No 190 on the Elimination of violence and harassment in the World of work*, in its comprehensive report of observations and recommendations for the State to take appropriate implementing measures so that *Convention No 190* is not rendered ineffective. Earlier, on 25 May 2021, the GNCHR had organised a hearing of persons and stakeholders on the Labour Bill under consultation, on the basis of its statutory powers (Article 18 (4), Law 4780/2021), while at the same time it carried out several parallel specific actions to promote the importance of *Convention No 190* to be ratified. Relevant activities of the GNCHR in detail:

[GNCHR Press Release for International Women's Day: The fight to eliminate gender discrimination still goes on](#), 8 March 2021.

Meeting of the two Vice-Presidents of the GNCHR (Giannis Ioannidis and Ellie Varhalama) during the Hellenic League for Human Rights (ELIADA) radio programme "Rights on Radio FM" (Athens 9,84 FM) on the Draft Labour Bill under consultation, 30 May 2021)

Participation of the Second Vice-President of the GNCHR, Ellie Varhalama and the President of the Greek Transgender Support Association, Marina Galanou, member of the GNCHR, in the session of the Special Standing Committee on Equality, Youth and Human Rights on: "metoo Greece": Measures to prevent and combat moral and sexual harassment and violence in public life, 02 June 2021.

Observations by the GNCHR on the bill of the Ministry of Labour and Social Affairs entitled: "About the Protection of Employment - Establishment of the Independent Authority "Labour Inspectorate" - Ratification of the ILO Convention No. 190 on violence and harassment in the world of work - Ratification of the ILO Convention No. 187 on the Promotional Framework for Occupational Safety and Health at Work - Transposition of Directive (EU) 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance for parents and carers" , 14 June 2021.



It should be stressed that in accordance with the provisions of the legislation in force, the GNCHR shall, *inter alia*, have as its mission: "the exchange of experience at international level with corresponding bodies of other international organisations, such as the United Nations, the Council of Europe, the Organisation for Security and Co-operation in Europe (OSCE) or of other States" and "the constant interaction and cooperation with international organisations, corresponding bodies of other countries, national or international Non-Governmental Organisations".<sup>5</sup>

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<sup>5</sup> Article 11 of Law 4780/ 2021.





Meanwhile, in its capacity as the Greek NHRI, the GNCHR participates **in international and European networks of counterpart institutions**, where it has even been elected as a member of their Governing Boards. At European level, the *Working Group on Economic, Social and Cultural Rights*, chaired by the GNCHR, and the *Working Group on Migration and Asylum*, chaired as well by the GNCHR, operate under the umbrella of the European Network of National Human Rights Institutions (ENNHRI).



### iii) The aim of the Report on the status of Women in Greece

The GNCHR in its role as an **advisor** to the State throughout the years of its operation, on matters pertaining to the adoption of legislative, administrative or other measures for the protection and promotion of human rights and by making relevant **policy proposals**, may elaborate reports on the situation of human rights in Greece, both in general and on issues of special interest. In the light of the above, the National Commission considered it appropriate to comprise and update in a single document its positions on the status of women in Greece, to point out to the Government the areas where women's rights are violated, while submitting proposals and solutions, thus contributing actively to the promotion and achievement of substantive gender equality.

The aim of this Report, according to the GNCHR, is to become a reference document and a useful guide for the State, the legislator, the Administration, the Government's law and policy practitioners, experts and professionals in the field, researchers and all interested parties. An added value of this Special Report is the grouping of the recommendations of the

GNCHR by specific thematic areas in order to make them easily accessible and understandable for every reader.

#### **iv) Structure, Methodology and priorities of the Reference Report on the status of women in Greece**

In order for this Report to be drawn up, all tools available to the National Commission were used, i.e. its previous opinions, recommendations, proposals, reports and positions on issues related to the situation of women's rights in Greece. At the same time, the GNCHR made use of the conclusions and findings arising from its communication and cooperation with the independent authorities in the country, as well as with the relevant EU institutions, regional and international organisations and similar bodies in other countries, on relevant issues.

It should be noted that the GNCHR has herein incorporated the findings and proposals it developed while preparing its contribution to **2021-2025 Greek National Gender Equality Action Plan (ESDIF)**, in support of the work of the *Ministry of Labour and Social Affairs and the former General Secretariat for demographic and Family Policy and Gender Equality*, now *General Secretariat for Equality and Human Rights*. The GNCHR takes the opportunity to reiterate **its constant readiness and willingness to establish the required institutional cooperation** after the transfer of the competence of Gender Equality and the relevant bodies (Research Centre for Gender Equality (K.E.th.I.), Ministerial Department Units for Gender Equality, etc.) from the *Ministry of Interior* to the *Ministry of Labour and Social Affairs* (Presidential Decree 81/2019) and its most recent transfer to the newly established Ministry of Social Cohesion and Family Affairs (Presidential Decree 77/2023), which took over, *inter alia*, key powers of the Ministry of Labour related to employment policy, such as social inclusion, gender equality, social housing. In this context, the GNCHR **recommends to the State the need for the portfolio and initiatives for gender equality to figure highly among the national priorities**; in view also of the low ranking of our country in the EU based on the Gender Equality Index of the European Institute for Gender Equality (EIGE), as detailed below in this report.<sup>6</sup>

It is in this light, that the National Commission is aligned with the proposals and findings of the European Commission in its Communication to the European Parliament, the Council, the *European Economic and Social Committee* and the *Committee of the Regions*: "*A Union of Equality - Gender Equality Strategy 2020-2025*" (COM(2020) 152 final),<sup>7</sup> according to which the goal should be a Europe of gender equality, where gender-based violence, gender

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<sup>6</sup> See herein pages 17-18.

<sup>7</sup> [Communication](#) from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, A Gender Equality Strategy 2020-2025 (COM(2020) 152) final, 5 March 2020.

discrimination and structural inequality between women and men shall belong to the past and where women and men, girls and boys, in all their diversity, are equal.<sup>8</sup>

At the same time, for the preparation of the Report and the relevant conclusions, the GNCHR made use of the exchange of views taking place in the international and European fora, in which it participates as the national NHRI. And it is of course in this context, that the GNCHR is constantly monitoring the country's score in the **EU ranking based on the Gender Equality Index**, where it should be mentioned that by 2022, our country started to make little progress overall as well as in sub-indices (e.g. work and participation), moving from the last position, where it has been steadily since 2013, upwards to the benchmarks. Indeed, in 2024, Greece's overall score is 59.3 with a maximum in 100, moving to the third place from the end to the overall comparative index, i.e. 25th place in the EU and with the EU average being 71 out of 100 points, that is about 11.7 points lower than average, according to the EIGE survey.<sup>9</sup> The increase from 2013 to 2024 by 10.7 points in Greece's score is mainly due to time-related improvements.

The GNCHR also reiterates in this report its general **constant observation that although Greece** is one of the few countries that **has achieved full equality under the law**, in other words, it has managed to adopt a comprehensive legislative framework for substantive gender equality and to formulate policies and practices to this effect, a fact that is neither self-evident nor negligible, **in practice there is a lack of effective compliance with the applicable rules and commitments and the failure of the competent State authorities to impose sanctions and penalties, resulting in a regime of impunity.**

In view of the above, the present report on the situation of women's rights in Greece selectively presents the positions of the GNCHR on the following issues:

## **SPECIFIC OBSERVATIONS**

### **A. Equality before Law and prohibition of discrimination against women and girls**

The GNCHR having closely monitored the gradual developments in the national legislative framework for equal treatment and gender equality over the last decade, acknowledges the important steps made in terms of legislation, however at the same time, it must reiterate its concerns about the failure of the competent state authorities to adopt all the necessary measures and to carry out all the necessary controls to ensure the effective implementation of the regulatory framework for the elimination of discrimination and substantive gender equality. This has become one of the phenomena constantly observed in Greek reality,

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<sup>8</sup> [Communication](#) from the Commission to the European Parliament, the Council, The European Economic and Social Committee and the Committee and the Committee of the Regions, A Gender Equality Strategy 2020-2025 (COM(2020) 152) final, 5 March 2020, page 2)

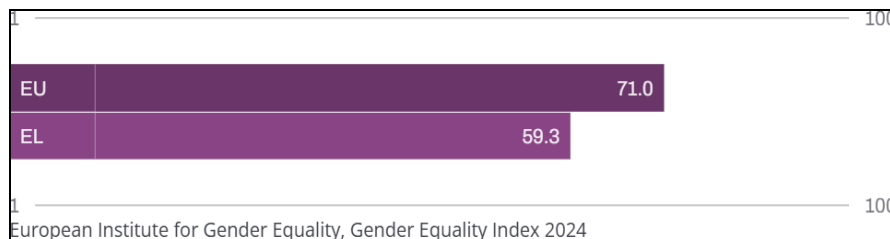
<sup>9</sup> See [Gender Equality Index 2023](#) Greece, EIGE, [Progress on gender equality in Greece since 2010](#). See also next page herein.



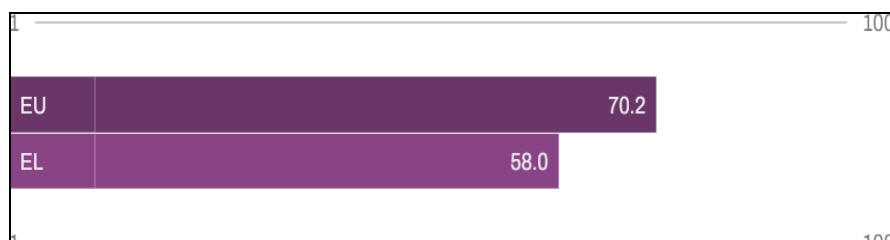
emphasized by the GNCHR at every possible opportunity. On the one hand, then, we can see the insufficient and **ineffective respect of the rules and commitments undertaken by the Greek State**, and on the other hand, the non-imposition of penalties and sanctions, resulting in an environment of **generalised impunity** and therefore in the absence of real protection. The relevant findings were included, not only in the Reports submitted by the GNCHR to the international institutions, but also in its recent *Observations on the 2021-2025 Greek National Gender Equality Action Plan* (herein after *Observations on the 2021-2025 ESDIF*) submitted to the Hellenic Ministry of Labour and Social Affairs.<sup>10</sup>

From 2020 onwards, at policy level, Greece has been committed to the European Gender Equality Strategy (2020-2025), a commitment that is also reflected in the *2021-2025 ESDIF*, in the development of which the GNCHR also contributed with its Observations and Recommendations,<sup>11</sup> as noted above. In accordance with the *European Strategy for Gender Equality 2020-2025*, none of the EU Member States has achieved full gender equality, and progress is still slow. In 2024, the EU Member States received a gender equality index score of 71/100, on average, which has improved by just 4.1 points since 2019 and by just 7.9 out of 100 points since 2013.<sup>12</sup>

### Gender Equality Index 2024



### Gender Equality Index 2023



<sup>10</sup> [Observations by the GNCHR on the 2021-2025 Greek National Gender Equality Action Plan](#) of the Ministry of Labour and Social Affairs, 27 September 2021, pages 20-21.

<sup>11</sup> [Observations by the GNCHR on the 2021-2025 National Action Plan for Gender Equality of the Hellenic Ministry of Labour and Social Affairs](#), 27 September 2021, pages 9-11.

<sup>12</sup> Gender Equality Index-[Compare Countries](#), EIGE, See also [Communication](#) from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, A Union of Equality: Gender Equality Strategy 2020-2025 (COM(2020) 152 final).

It should be noted that the **phenomenon of impunity is global**, as underlined in the European Parliament Report, which highlights the issue of impunity for criminals and perpetrators of law infringements, namely the absence of accountability of those responsible for violations of law.<sup>13</sup> Addressing impunity at global level is a matter of urgency, the Report concludes, as pointed out in many of the European Parliament's recent resolutions.

Furthermore, the **lack of available analytical and reliable data** poses a major challenge which has been hindering progress and which the *CEDAW Committee* had highlighted with particular concern since 2013 in its Concluding Observations, and certainly reiterated in its Concluding Observations in 2024.<sup>14</sup> In addition to being an obligation explicitly provided for by the legislation (Article 13 of Law 4604/2019), the irregular and inconsistent collection of statistical data does not allow for an effective assessment of the progress of the implementation of substantive gender equality in practice, nor does it allow for the evaluation of the country's performance in comparison with others. At EU level for example, category-specific updated data for Greece are often not available from EIGE.<sup>15</sup>

Since 2006, the GNCHR has on several occasions dealt with the issue of the application of the principle of equal treatment and non-discrimination, making recommendations for the adaptation of Greek legislation to the letter and spirit of the EU Directives on equal treatment.<sup>16</sup> In this respect, the GNCHR, paying particular attention to combating gender inequalities, stresses at every opportunity the importance of adopting and implementing legislative measures on gender equality. In 2010, in its Observations on the draft bill of **Law 3896/2010 on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation - Harmonisation of existing legislation with Directive 2006/54/EC of the EP and of the Council**, which was the first specific legislative framework establishing equal treatment and prohibiting discrimination against men and women in employment, the GNCHR stressed the need for legal improvements towards effective compliance with the EU framework, such as ensuring i)

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<sup>13</sup> "The state of impunity in the world" [Summary of the 2021 report](#) on global rights by Fight Impunity, European Parliament [European Parliament Resolution](#) of 17 February 2022 on human rights and democracy in the world and the European Union's policy on the matter-Annual report 2021(2021/2181(INI))

<sup>14</sup> [Concluding Observations on the seventh periodic report of Greece](#) adopted by the Committee at its fifty fourth session, [CEDAW/C/GRC/CO/7](#), 26 March 2013, paragraphs 2, 20, 22, 26, 28, 32, 33, 39, UN CEDAW/C/GRC/CO/8-9: Concluding Observations on the combined fourth to sixth Periodic Report of Greece, 19 February 2024, paragraphs 49-50.

<sup>15</sup> EIGE Web page [Gender Equality Index](#)

<sup>16</sup> The GNCHR [Observations on the draft Bill, "Implementation of equal treatment for men and women with regard to access to employment, vocational training and promotion, working terms and conditions"](#), 22 June 2006, [Observations on the draft Bill, "Implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation - Harmonisation of the existing legislation with Directive 2006/54/EC of the European Parliament and of the Council"](#), 1 November 2010, [Observations on the draft Bill of the Ministry of Justice, Transparency and Human Rights "Implementation of the principle of equal treatment regardless of race, colour, national or ethnic origin, genealogical origins, religious or other..."](#), 20 September 2016.

equal treatment in occupational social security schemes **ii)** protection against all possible forms of victimisation in labour relations, including vocational training **iii)** effective legal protection of victims, including the right of any legal entity (e.g. recognised professional associations of workers or employers, their recognised associations or chambers, women's NGOs, non-profit associations for human rights) to intervene before any administrative authority and any court **iv)** reversal of the burden of proof in judicial and extrajudicial procedures **v)** enhancement of the role of the Labour Inspectorate (SEPE).<sup>17</sup> However, most of the Observations made by the National Commission were not accepted by the competent government bodies.

In 2016 the GNCHR welcomed the adoption of [law 4443/2016 on the implementation of the principle of equal opportunities and equal treatment of men and women and the prohibition of discrimination in matters of employment and occupation](#),<sup>18</sup> the aim of which was to improve law 3304/2005, which in turn had transposed Directives 2000/43/EU and 2000/78/EU into national law, with a view to the proper transposition of these Directives. With regard to recent developments on equal treatment legislation, the GNCHR welcomed the inclusion of gender identity and gender characteristics, as well as of social and family status, among the grounds for non-discrimination in public and private employment.<sup>19</sup> However, in its Observations on the draft Bill the GNCHR clarified that while [Law 4443/2016](#), in theory, broadens the scope of equal treatment by introducing **new grounds of discrimination**, such as **gender identity and gender characteristics** and replacing the term *gender orientation* with the more appropriate term *sexual orientation*, in order to address discrimination in employment more effectively, its scope remains limited. Although equal treatment is a constitutional requirement, the law is still mainly applicable in the field of employment, while in other areas it only provides for specific forms of non-discrimination. In a sense, certain grounds of discrimination, such as race, colour, national or ethnic origin, are ranked higher than others, namely disability, chronic illness, age, sexual orientation and gender identity.<sup>20</sup> More specifically, under [Law 4443/2016](#) discrimination on grounds of race, colour, national or ethnic origin in the public and private sectors is

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<sup>17</sup> Observations by the GNCHR on the draft Bill, "Implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation - Harmonisation of the existing legislation with Directive 2006/54/EC of the European Parliament and of the Council, 1 November 2010.

<sup>18</sup> Observations by the GNCHR on the draft Bill of the Ministry of Justice, Transparency and Human Rights "Implementation of the principle of equal treatment regardless of race, colour, national or ethnic origin, genealogical origins, religious or other ...", 20 September 2016.

<sup>19</sup> Article 1 of Law 4443/ 2016. See Observations by the GNCHR on the draft Bill of the Ministry of Justice, Transparency and Human Rights "Implementation of the principle of equal treatment regardless of race, colour, national or ethnic origin, genealogical origins, religious or other , national or ethnic origin, genealogical origins, religious or other...", 20 September 2016, page 13)

<sup>20</sup> See Treaty establishing the European Community (Nice consolidated version), Part One: Principles, Article 13( 1) "Without prejudice to the other provisions of this treaty and within the limits of the powers that conferred by it upon the Community, the Council, acting unanimously on a proposal from the Commission and after consulting the European Parliament, may take appropriate action to combat discrimination based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation.'

prohibited when related to **(a)** social welfare including social security and health care, **(b)** social benefits and tax relief or advantages, **(c)** training and **(d)** access to the provision of goods and services, including housing. In the light of the above, **discrimination on grounds of disability, age, sexual orientation, gender identity and other characteristics is not explicitly prohibited in all of the above mentioned areas.** As a result, the law prevents for example, unequal treatment in respect of access to health care, education, social benefits, access to goods and services for Roma, but not for LGBTQI+ persons or persons with disabilities.<sup>21</sup> One positive development that is worth noting here is the adoption of **Law 5023/2023**, which provides for the extension of the principle of equal treatment for persons with disabilities to other socio-political areas.<sup>22</sup>

In its Observations on the draft Bill, the GNCHR, particularly with regard to the burden of proof, expressed once again its satisfaction with the relevant provision (see Article 9 of [Law 4443/2016](#)), reiterating its firmly held position concerning the application of the rule on the shifting the burden of proof not only before the courts but also before any other competent authority, as required by the above mentioned EU Directives on the principle of equal treatment. The Commission considers that the effect of the rule of shifting the burden of proof should not be limited to the courts and the competent administrative authorities but extended to cases of complaints before bodies for the promotion of the principle of equal treatment. Furthermore, as it has repeatedly stressed, to ensure the full and effective application of the rule of shifting the burden of proof, necessary amendments must be made to the Codes of Civil and Administrative Procedure, as well as to the legislation of the *Simvoulío tis Epikratias* (Council of State), because the rule established by the Directives constitutes an exception to the general rule on civil and administrative proceedings, according to which the person bringing a case before the courts or the competent administrative authorities bears the burden of pleading and proving the facts of the case.

The GNCHR has identified **Law 4604/2019 on the promotion of substantive gender equality, prevention and fight against gender-based violence**, as the first attempt to draw up a horizontal bill aimed at creating the conditions that could lead to the achievement of substantive gender equality and the elimination of gender inequalities in all areas of private, public, social and economic life.<sup>23</sup> Indeed, the *law on substantive gender equality*, as it is commonly called, established a coherent framework of rules aimed at promoting substantive gender equality, preventing and combating gender-based violence, domestic

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<sup>21</sup> See Vasilis Sotiropoulos, “[What is the new anti-discrimination law?](#)” At the E-Lawyer BlogSpot, 10.12.2016.

<sup>22</sup> See herein, page...

<sup>23</sup> [Observations by the Greek National Commission on Human Rights \(GNCHR\)](#) on State’s draft reply to the list of issues prior to the submission of the combined Eighth and Ninth Periodic Report under the Convention on the Elimination of Discrimination against Women (CEDAW), 9 April 2023, page 6, and GNCHR Information relevant to the implementation of the Convention on the Elimination of all forms of Discrimination against Women – CEDAW 1, 21 October 2020, pages, 1-2. As set out in Article 2 (9) of Law 4604/2019, gender discrimination constitutes any physical, psychological or verbal behaviour, through which individuals are degraded, among others, on grounds of gender identity.

violence included, as provided for by the Istanbul Convention. Points in the law which are considered positive include, *inter alia*, the adoption of *gender mainstreaming in all policies*, *gender budgeting* and *multiple discrimination* concepts, introduced for the first time in Greek legislation (Article 2 of Law 4604/2019). However, at the same time, the GNCHR notes that the **new wording** adopted by **Law 4604/2019 raises questions as to the compatibility of the Law with EU legislation**, for instance the definitions of general concepts, such as *direct* and *indirect discrimination* or *positive action*, which lag behind the national and EU acquis (Directive 2006/54/EU on the application of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation (Recast)).<sup>24</sup> Thus, in the **definition of direct discrimination**, the phrase in the EU Directive 2006/54/EC “where one person is treated less favourably...”, which had been transposed in its entirety to the previous Law 3896/2010, it is replaced by the phrase “act or omission which excludes a person or obviously puts them at a disadvantage...”, weakening to some extent the degree of protection of the victim. The same applies to the **definition of indirect discrimination**, where the phrase “would put persons of one sex at a particular disadvantage...”, albeit worded in positive and strong terms, it is replaced by the phrase ‘*putting persons at a disadvantage on the grounds of sex...*’.<sup>25</sup> Similarly, a more restrictive approach compared to that of the above EU Directives and Law 3896/2010 is adopted with regard to the **definition of sexual harassment**,<sup>26</sup> since, in the 2019 Law, the term “purpose” is omitted from the phrase “with the purpose or effect of violating...”. In addition, this law does not **explicitly prohibit discrimination on grounds of gender**, contrary to the provisions of Law 4443/2016 and Law 4491/2017. Moreover, **there is no explicit reference to the EU Directives** in the text of the Law and therefore, the framework is not in line with Article 33 of Directive 2006/54/EU and Article 18 of Directive 2000/78/EU, which provide that when Member States adopt legislative measures for their harmonisation, must contain an explicit reference to the respective Directive or be accompanied by such reference on the occasion of their official publication. Of utmost importance is the provision of Law 4604/2019 for the establishment of the *National Council for Gender Equality*, the collective advisory body referred to in Article 9, (2)(g) of law 4604/2019, as amended by Article 20(2) of Law 4808/2021. In April 2023, in *its Observations on the State’s draft reply to the list of issues prior to the submission of the combined Eighth and Ninth Periodic Report under the Convention on the*

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<sup>24</sup> See Article 14 “Prohibition of discrimination” of Directive 2006/54/EC of the European Parliament and the Council on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation (recast); where it is expressly provided that a difference of treatment which is based on a characteristic related to sex shall not constitute discrimination.

<sup>25</sup> See European Commission, European Network of legal experts on Gender Equality and Non-discrimination, Panagiota Petroglou, Country report gender equality: Greece 2020 and Greece-country-report-gender-equality-2023. It should be noted that the definition of direct and indirect discrimination, uses only the present tense (“excludes or places in an inferior position”) omitting the present perfect tense and the conditional tense (“is, has been or would be treated in a comparable situation”) used by the Directive and the earlier legislative framework.

<sup>26</sup> The new term “harassment” is not defined as “with the purpose or effect of violating the dignity of a person...” as in Directive 2006/54/EC and Law but only as “...with the effect...”.



*Elimination of Discrimination against Women (CEDAW)* (hereinafter *Observations on the 2023 State's Report*), the GNCHR expressed its concern about the fact that, contrary to the wording of the provision (Article 9(4) of Law 4604/2019), the Transgender Support Association (SYD), which is recognised by the State and which also appoints a member to the Plenary of the National Commission, has never been invited to attend or participate in a meeting of the above mentioned Council. The same applies to the National Confederation of Disabled People Greece (ESAmE), which, similarly was never invited to attend or participate as a representative and which also appoints a member to the Plenary of the National Commission.<sup>27</sup> Moreover, there is no up-to-date information on the establishment and functioning of the *National Council for Gender Equality*.

Moreover, as regards the right of intervention in favour of the victim of discrimination before the courts at all stages of the proceedings according to Article 23 of Law 4604/2019, this is limited to recognised professional associations of employees or employers and their recognised unions or chambers, thus creating a legal uncertainty as to whether women's NGOs are entitled to intervene. In view of the above, the GNCHR considers that there is a setback for the gender equality acquis.<sup>28</sup> The GNCHR takes the opportunity to reiterate its proposal submitted during the recent constitutional amendments regarding the extension of the list of grounds of non-discrimination, so that gender, gender identity and gender characteristics are included, had not been taken into consideration (Article 5(2)).<sup>29</sup>

It is noted that despite the legislative measures in place, in practice, the rates of reports filed with the Greek Ombudsman for gender discrimination increased in 2022, while they decreased in 2023.

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<sup>27</sup> [Observations by the GNCHR on State's draft reply to the list of issues prior to the submission of the combined Eighth and Ninth Periodic Report under the Convention on the Elimination of Discrimination against Women \(CEDAW\)](#), 9 April 2023, pages, 12-13.

<sup>28</sup> European Network of legal experts on Gender Equality and Non-discrimination, [FLASH REPORT](#), "The new Law 4604/2019 on substantive Equality entered into force on 26 March 2019," 1 July 2019.

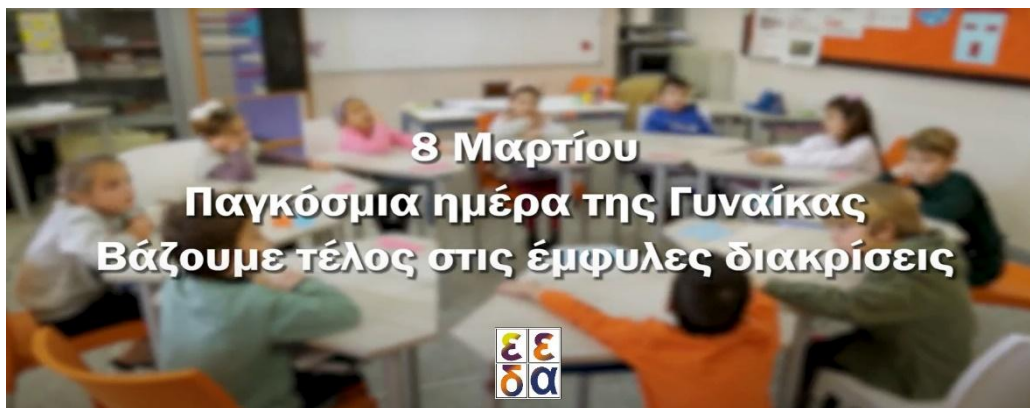
<sup>29</sup> According to the [proposals of the GNCHR for the revision of the Constitution](#), February 7, 2019, page 5, "the absolute protection of life, honour, freedom, which is already provided for by legislation, without any discrimination on grounds of nationality, race, language, religion or political opinions", should be modified in order to include protection against discrimination on grounds of colour, disability, age, sex, sexual orientation, gender identity or gender characteristics, national or social origin, national minority, property, birth or other status, according to international and European human rights standards. The proposal was discussed in the Parliament but was not approved, following the competent committee's failure to reach a qualified majority. See also the Glossary of Basic Terms and Concepts for Gender Mainstreaming.

### Number of reports with the Greek Ombudsman

	2016	2017	2018	2019	2020	2021	2022	2023
Total reports	462	546	704	935	952	1054	936	877
Reports on gender discrimination	65	40	57	44	51	49	59	52%

Source: The Greek Ombudsman (2022)

In view of the above, what is remarkable, is that despite the legislator's intention to establish a coherent framework for effective gender equality, in practice today we note the absence of good and effective practices and implementing measures on the one hand and of appropriate measures to assess the implementation of the current framework, on the other.<sup>30</sup>



In the light of the foregoing, the GNCHR, addresses the following **Recommendations** to the Greek State:

**1. The GNCHR calls on the Greek State to ensure the effective implementation of the principle of equal opportunities and equal treatment of men and women in employment and occupation and of the prohibition of all forms of discrimination in all areas of economic and social life, by taking a new integrative initiative, with a view to the proper transposition into national law of Directives 2000/43/EU and 2000/78/EU. In particular, the GNCHR proposes that the absolute protection of life, honour, freedom,**

<sup>30</sup> See European Commission, European Network of legal experts on Gender Equality and Non-discrimination, Panagiota Petroglou, Country report gender equality: Greece 2020 and Greece-country-report-gender-equality-2023, p 39 et seq; Country report – Gender equality – Greece – 2024, p 39 et seq. See also herein page 56.

*which is already provided for by legislation, without any discrimination on grounds of nationality, race, language, religion or political opinions, should be amended to further include protection against discrimination on grounds of colour, disability, age, sex, sexual orientation, gender identity or gender characteristics, national or social origin, national minority, property, birth or other status, according to international and European human rights standards.<sup>31</sup>*

*2. The GNCHR calls on the Greek State to ensure the horizontal and cross-sectoral coordination of the competent services, while enhancing the ongoing consultation and exchange of information, experience and views with civil society, through transparent procedures, aimed at fostering and promoting substantive gender equality. It is in this direction that the National Commission can play an important role as an advisory body, building on its pluralistic composition and thus bridging the gap between the State and civil society.*

*3) The GNCHR reiterates the essential need for the reinforcement of a reliable statistical data collection system based on a gender-specific perspective and for the intensification of the relevant research at national level. The European Institute for Gender Equality (EIGE) statistical data base,<sup>32</sup> is a good practice and a user-friendly tool to collect gender equality statistical data in the EU. The GNCHR calls on the State to ensure that reliable, updated and classified statistical data are delivered to EIGE,<sup>33</sup> so that its performance in the field of gender equality can be effectively assessed.*

*4) The GNCHR recommends the development and effective implementation of gender budgeting, in line with the principles of good governance, which is safeguarded through transparency and participation (such as formulated budgetary targets for the protection of women, vulnerable and marginalised women included, with measurable results within specific time frames, reporting and accountability. Clear implementation and follow-up instructions should be provided to the relevant public officials so that they can contribute to the fulfilment of the government's commitments. It is noted that civil society and the media have a key role to play in monitoring and holding the government accountable for their budgets.<sup>34</sup>*

*5) The GNCHR points out that the necessary interventions in legislation in order to achieve the required compliance with EU legislation and international conventions, must also be implemented in the Individual Labour Law (Presidential Decree 80/2022) which has included these problematic provisions in their entirety, as well as the provisions of Law 4808/2021 on the ratification and the implementation measures of*

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<sup>31</sup> See footnote 21 above, GNCHR [proposals on the Revision of the Constitution](#), February 7, 2019, p. 6.

<sup>32</sup> European Institute for Gender Equality EIGE Gender [Statics Database](#)

<sup>33</sup> EIGE Web page [Gender Equality Index](#)

<sup>34</sup> Nafsika Moschovakou, Matina Papagiannopoulou, [Gender budgeting Guide and tools for gender analysis and budgeting in municipalities](#), March 2021.



*the ILO Convention No. 190 (See Part II, Articles 15 to 68) creating serious interpretation problems as regards the application of the relevant provisions and thereby risking the effective protection of victims of unequal treatment, violence and harassment at work, on the basis of gender and actual or presumed characteristics of sexual orientation and gender identity, as underlined in the [GNCHR Observations on the Bill of the subsequent Law 4808/2021](#).<sup>35</sup>*

*6) Taking into account the low ranking of our country in the EU based on the EIGE Gender Equality Index, as detailed in this report, the GNCHR draws the attention of the competent state bodies to the need to maintain the portfolio and initiatives for gender equality high among national priorities.*

## **B. Gender stereotypes, harmful practices and mass media**

The GNCHR reiterates that Gender equality is an everyday achievement at all levels and in all areas. In this context and in relation to gender-based discrimination in the mass media field, the GNCHR has made oral public and written interventions, (Observations on Action Plans, Parallel Reports submitted to UN institutions) expressing its concern about **maintenance and promotion of dominant stereotypes in Greek public opinion and mass media**. More specifically, as indicated in the GNCHR Observations on the 2021-2025 National Gender Equality Action Plan, the need for mass media people to use correct words and refrain from using sexist language and reproducing distorted norms, according to international and national standards,<sup>36</sup> is yet to be fulfilled. The GNCHR expresses its deep concern since it realises that despite the policies planned and the measures taken, no substantial progress has been made in this area.<sup>37</sup>

Recent examples, such as a public TV spot to protect against coronavirus<sup>38</sup> and a TV reality show,<sup>39</sup> have shown that gender stereotypes are still present. **Moreover, the coverage of**

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<sup>35</sup> [GNCHR Observations on the Draft Bill of the Ministry of Labour and Social Affairs](#), entitled: "On Labour Protection - Establishment of the Independent Authority Labour Inspectorate Ratification of the ILO Convention No. 190 on violence and harassment in the world of work Ratification of the ILO Convention No. 187 on the Promotional Framework for Occupational Safety and Health at Work Incorporation of Directive (EU) 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance for parents and carers", 14 June 2021, pages 7, 19-20.

<sup>36</sup> The Council of Europe has already issued a relevant Recommendation in 1990: [RECOMMENDATION](#) No. R (90) 4. See also Research Centre for Gender Equality (K.E.th.I.), [Guide to Mass Media for the Elimination of sexism and Gender discrimination](#), Nafsika Moschovakou Lina Chatziantoniou, Athens 2018, p. 5-6.

<sup>37</sup> [Observations by the GNCHR on the 2021-2025 National Gender Equality Action Plan of the Hellenic Ministry of Labour and Social Affairs](#), 27 September 2021, pages 10, 13, 23, 35, 42, 14 November 2023,

<sup>38</sup> See the TV spot from the General Secretariat for Civil Protection that was removed after widespread criticism for promoting sexist stereotypes, the video: <https://youtu.be/ZUVzB6Kn-0k>, see also relevant Official Press Release: <https://www.civilprotection.gr/el/i-politiki-prostasia-enonei-den-theloyme-na-dihazei>, 10 May 2020.

<sup>39</sup> About the incident in the reality show, "Big Brother":

<https://greece.greekreporter.com/2020/09/07/offensive-rape-remark-by-big-brother-contestant-causes-uproar-in-greece/>. According to the League for Women's Rights, recent TV reality shows systematically attack high values such as human rights, gender equality and culture, [PR](#), September 7, 2020.

cases concerning femicides by the mainstream media remains particularly problematic.<sup>40</sup> The majority of the press reports after every femicide are full of melodramatic references to "*crimes of passion*", "*family tragedies*", and "*unfortunate women*" which in fact "*launder*" the image of the abusers - femicide perpetrators. The strong effect of stereotypes on gender inequalities and sexism may also be observed in cases of rape.<sup>41</sup> Having regard to the 2023 State Report on the list of issues to the *CEDAW Committee*, where the positive steps towards integration of gender perspective and fight against gender stereotypes and sexism related to the image of women in the media are recorded, it becomes obvious that adequate actions and measures to deconstruct negative stereotypes are still lacking.<sup>42</sup> The European Digital Media Observatory (EDMO) which is mandated to identify potential risks to media pluralism in EU Member States and candidate countries, has concluded in its 2023 Report for Greece, that **women are portrayed in the news in a highly stereotypical and sometimes derogatory way**.<sup>43</sup> The same Report notes that the indicator of women's participation and access to the media is rated as high risk (83%), indicating consistent under-representation of women in executive positions and boards of directors. In the private sector, only 8% of board members in TV channels and 20% of executives are women. Furthermore, in the 2024 Report covering all Member States, Greece's performance regarding gender equality in the media is once again classified in the high-risk category.<sup>44</sup>

However, it is worth mentioning that in the Council of Europe 2019 *Analytical Report*<sup>45</sup> on the progress made on gender equality in the media, following the publication and adoption of Recommendation CM/Rec(2013)1 on *gender equality and media*,<sup>46</sup> **Greece is recorded as one of the Member States that have taken measures to comply with the Recommendation**, such as revision of legislation, awareness-raising and information dissemination actions, creation of equality indicators. In this respect, a series of actions to combat gender stereotypes and sexism related to the portrayal of women in the media are

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<sup>40</sup> See "To mov", (*The purple*) interview: [Sexism and Mass Media, reality and prejudice](#), a discussion between Katerina Bregianni and George Plios, Professor at the National and Kapodistrian University of Athens, 19 June 2018.

<sup>41</sup> See the rape case of Georgia Mpika, whose application to the ECtHR was found admissible, *GB v Greece* 911/23, 29 December 2022.

<sup>42</sup> [Eighth and Ninth Periodic Report under the Convention on the Elimination of Discrimination against Women](#) submitted to the *CEDAW Committee*, 8 May 2023.

<sup>43</sup> European University Institute, EUROPEAN DIGITAL MEDIA OBSERVATORY (EDMO), research project Report [National report: Greece](#), L. Papadopoulou, I. Angelou, Issue - June 2023. The Observatory of the Centre for Media Pluralism and Media Freedom is a research tool aimed at identifying potential risks to media pluralism in the Member States of the European Union (EU) and in candidate countries.

<sup>44</sup> European University Institute, EUROPEAN DIGITAL MEDIA OBSERVATORY (EDMO), [Application of the Media Pluralism Monitor In the European Member States and in Candidate Countries in 2023](#), Issue June 2024, p. 149.

<sup>45</sup> See Council of Europe, GENDER EQUALITY AND MEDIA, [Analytical Report – 2019](#) Data of the Gender Equality Commission Steering Committee on Media and Information Society, pages 25, 27-28, 33, 37-38, 43.

<sup>46</sup> [Recommendation CM/Rec \(2013\)1](#) of the Council of Europe Committee of Ministers to Member States on gender equality and media.

also provided for in the *National Action Plan for Women, Peace and Security-ESDGEA* (page 30), that incorporates the prevention and combating of stereotypes and prejudices in all its axes. The GNCHR monitors and assess the progress towards the implementation of the ESDGEA actions, conducting in parallel awareness raising actions towards the elimination of gender stereotypes in all sectors.

When preparing its Shadow Report to be submitted to the CEDAW Committee prior to the list of issues, in October 2020,<sup>47</sup> it was with regret that the GNCHR found that the 2013 Concluding Observations of the *CEDAW Committee*<sup>48</sup> are still urgently relevant. Therein, the Committee reiterated its long-standing concern about the **traditional patriarchal attitudes and the prevalent gender role stereotypes in our country**, urging the Greek State to engage in educational activities and awareness-raising campaigns. The same concerns are reiterated by the *CEDAW Committee* in its 2024 Concluding Observations,<sup>49</sup> which remains worrisome for the persistence of deep-rooted stereotypes around the roles and responsibilities of women and men in the family and in society, calling on the State, **through educational and media campaigns with the active involvement of women's organisations**, to strengthen the common perception of equality between women and men. It is quite disappointing that today, at European level, **media don't get priority in gender equality policies harmful stereotypes persist**.<sup>50</sup>

Regarding the current legislative framework, the GNCHR welcomes the adoption of Law 4779/2021 on audiovisual media services provide by media, which marked a new important development, explicitly prohibiting in Article 8 *Prohibition of incitement to violence or hatred* (Article 6 of Directive 2010/13/EU), the insertion and promotion of discrimination and incitement to violence or hate speech on grounds of, inter alia, identity or sex characteristics and sexual orientation (Article 6 of Directive 2010/13/EU, as amended by Directive 2018/1808/EU). The Law transposes into the national legislation Directive 2010/13/EU *on the provision of audiovisual media services*, in the amended version of Directive 2018/1808/EU, under which Member States are invited to coordinate, in order to eliminate discrimination on grounds of sex in audiovisual commercial communications provided by all media service providers under their jurisdiction. As mentioned above,<sup>51</sup> in 2019 the

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<sup>47</sup> [Observations by the GNCHR on the implementation of the Convention on the Elimination of all forms of Discrimination against women \(CEDAW\)](#), 21 October 2020.

<sup>48</sup> [Concluding observations on the seventh periodic report of Greece](#) adopted by the Committee at its fifty fourth session, [CEDAW/C/GRC/CO/7](#), 26 March 2013.

<sup>49</sup> CEDAW/C/GRC/CO/8-9: Concluding Observations on the combined eighth and ninth periodic reports of Greece, 20 February 2024, paragraph 21, 22(a)

<sup>50</sup> See revised Audiovisual Media Services Directive (EU) 2018/1808 of 14 November 2018 of the European Parliament and of the Council *amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive) in view of changing market realities*.

It marked an important development in updating the EU's legal framework governing media, calling on Member States to eliminate gender discrimination in audiovisual commercial communications provided by all media service providers operating under their jurisdiction.

<sup>51</sup> See page 22

GNCHR welcomed Law 4604/2019 on substantive gender equality, particularly focusing on the positive development with the provision of Article 24 *Measures to promote gender equality in mass media, advertising and the responsibilities of the Greek National Council for Radio and Television*, which defines that media (print or electronic) and advertising shall ensure substantive gender equality by **promoting an equal and free from gender stereotypes portrayal of individuals**. In 2010, the publication of Presidential Decree 109/2010 which harmonises Greek audiovisual legislation with the provisions of Directive 2010/13/EU, marked a significant development.<sup>52</sup> Article 27 of the above Presidential Decree (Article 28 of Directive 2010/13/EU) enshrines the right of a response (remedy) request following an infringement of one's personality caused by television broadcasting. It's about an administrative procedure before the *Greek National Council for Radio and Television*, providing an additional protective measure, regardless of any criminal or civil liability of the television broadcaster, and notably of the provisions relating to the protection of persons affected under the Civil Code and the Code of Civil Procedure.

Two (2) (**Decisions 5/2021 & 210/2021**) out of a total of thirty-seven (37) **Decisions of the Greek National Council for Radio and Television, imposing measures against a website and a television station for poor quality television programming**,<sup>53</sup> that offended human dignity and at the same time encouraged gender discrimination, violating the legislation on gender equality and gender stereotypes, respectively, have been positively assessed by the GNCHR. Greek television programmes often reinforce gender stereotypes by repeatedly broadcasting television series produced twenty (20) years ago, which are no longer in line with current standards of gender equality, as they repeatedly depict patriarchal attitudes and stereotypes, while sometimes even violence against women (such as slapping) is presented as acceptable and normal. The recent decision of the *Greek National Council for Radio and Television (Decision 271/2022)* finding intentional discrimination against persons on grounds of sexual orientation during broadcasting on a radio station and imposing an administrative fine, has an equally positive effect.

In view of the above, the GNCHR underlines that **gender discrimination in the field of media is complex** and should be considered, both in relation to the content produced, which may present derogatory portrayals of women, as well as in relation to the

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<sup>52</sup> of Directive 2010/13/EU (OJ L 95, 15.4.2010) of the European Parliament and of the Council, codifying the provisions of Directive 89/552/EEC (OJ L 298, 17.10.1989), as applicable after its last amendment by Directive 2007/65/EC (OJ L 332, 18.12.2007) of the European Parliament and of the Council on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the pursuit of television broadcasting activities (Text with EEA relevance).

<sup>53</sup> [https://www.nchr.gr/images/English\\_Site/GYNAIKES/GNCHR\\_CEDAW\\_REPLY\\_TO\\_MINISTRY\\_OF\\_LABOR.pdf](https://www.nchr.gr/images/English_Site/GYNAIKES/GNCHR_CEDAW_REPLY_TO_MINISTRY_OF_LABOR.pdf) Observations by the Greek National Commission of Human Rights (GNCHR) on State's draft reply to the list of issues prior to the submission of the combined Eighth and Ninth Periodic Report under the Convention on the Elimination of Discrimination against Women (CEDAW), 9 April 2023,

participation of women. The Global Media Monitoring Project also draws similar conclusions on gender inequalities and gender bias and discrimination in the media.<sup>54</sup>

For its part, the National Commission, in the context of its mission, and taking into account that **media are at the forefront of contemporary social reality and that they play a key role in forming opinions, attitudes and biases**, remains firmly and consistently committed to raising greater awareness of civil society on gender equality issues by disseminating information in the media, its website and social media. (Twitter and facebook). You can read below the relevant actions of the GNCHR:

- Awareness raising campaign for equal participation of women in political life, with the promotion of a TV and a radio spot, reminding everyone that we vote equally for competent women and competent male candidates, far from gender stereotypes and prejudices. The campaign was launched with a public debate at the Journalists' Union of Athens Daily Newspapers (ESIEA) entitled, "*Women in Politics: We decide equally, we vote equally*" organised by the League for Women's Rights and the GNCHR on 18.05.2023. A similar GNCHR radio spot entitled, "*Vote for skills - No stereotypes*" was released on 3 May 2023.
- The International Women's Day spot, entitled "*We can change it!*", where the GNCHR is joining its voice with the wonderful children of grade A of the primary School of Tolo, asking for an end to gender discrimination, 8 March 2022.
- Interview of the President of the GNCHR, Maria Gavouneli, on the radio programme "*Rights in FM*" (Athens 9.84), on issues related to women's rights and equality, on the occasion of the uprising in Iran, 5 October 2019.



ΕΛΛΗΝΙΚΗ ΔΗΜΟΚΡΑΤΙΑ  
ΕΘΝΙΚΗ ΕΠΙΤΡΟΠΗ ΓΙΑ ΤΑ ΔΙΚΑΙΩΜΑΤΑ ΤΟΥ  
ΑΝΘΡΩΠΟΥ  
Νεοφύτου Βάμβα 6, 106 74 Αθήνα  
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ΣΥΝΔΕΣΜΟΣ ΓΙΑ ΤΑ ΔΙΚΑΙΩΜΑΤΑ ΤΗΣ ΓΥΝΑΙΚΑΣ  
ΓΙΑ ΔΙΚΑΙΩΜΑΤΑ - ΓΕΕ ΥΠΟΧΡΕΩΣΕΙΣ  
Σκουφά 60, 106 80, Αθήνα  
Τ: 2103626240 | e-mail: [L.women-rights@otenet.gr](mailto:L.women-rights@otenet.gr)  
[www.leagueforwomensrights.gr](http://www.leagueforwomensrights.gr)

Δημόσια Συζήτηση  
«Γυναίκες στην πολιτική: Κρίνουμε ισότητα, ψηφίζουμε ισότητα»  
ΤΕΤΑΡΤΗ 17 ΜΑΙΟΥ 2023 και ώρα 12.00  
στην ΕΣΗΕΑ, Ακαδημίας 20, Αίθουσα «Γ. Καράντζας», 1ος όροφος

In view of the above, as well as the *CEDAW Recommendation* on strengthening measures, including awareness-raising and education campaigns and campaigns to eliminate

<sup>54</sup> See Research Center for Gender Equality (K.E.th.I.) [Guide](#) to Mass Media for the Elimination of sexism and Gender discrimination, Nafsika Moschovakou Lina Chatziantoniou, 5-6.



stereotypes concerning the roles and responsibilities of women and men in the family and in society,<sup>55</sup> the GNCHR, addresses the following **Recommendations** to the Greek State:

**1) In the context of the initiatives developed to raise public and media awareness on human rights issues as part of its mission, the GNCHR encourages the proactive engagement with media in promoting equality, diversity and women's rights with a focus on vulnerable groups such as women with disabilities, migrant/refugee women, asylum seekers, Roma women and LGBTI+ persons. Spots, broadcasts and campaigns on matters related to women's rights should be planned and promoted through all channels, through the media and public discourse, in order to raise awareness of racism and gender discrimination phenomena.**

**2) The GNCHR calls on the State to take appropriate targeted measures such as, inter alia, seminars for journalists on homophobia and transphobia and for bloggers on LGBT issues, awareness-raising activities and events, etc., to ensure that, along with raising awareness on the prohibition of discrimination, respect for biological and social gender differences is also promoted.<sup>56</sup>**

**3) The GNCHR recommends that the competent authorities include systematic actions to raise awareness and disseminate knowledge on gender equality issues to younger generations, by providing education at all levels and through relevant cultural initiatives related to specific, consistent and coherent educational programmes aimed at combating gender inequalities.**

**4) The GNCHR calls on the Greek National Council for Radio and Television (ESR) to implement specific measures such as a gender equality sign or a warning signal indicating that particular broadcasts are not aligned with current gender equality standards. Such measures will encourage television and radio broadcasters make better informed choices about which programmes they choose to broadcast, so as to avoid the risk of backsliding by negating the progress made so far. The ESR shall be clearly oriented towards reducing incidents of sexist language in broadcasts and cultivation of sexist stereotypes and contribute dynamically in this direction.**

**5) Promoting gender equality in the digital world through capacity building. To this end, the findings of UNESCO's reports entitled "The Effects of AI on the Working Lives of Women" and "Multistakeholder group discusses ten building blocks towards creating inclusive AI policies" where the effects of the increasing use of advanced technology on gender equality and access to information are investigated could be useful.<sup>57</sup>**

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<sup>55</sup> See UN CEDAW/C/GRC/CO/8-9: Concluding observations on the combined fourth to sixth Periodic Report of Greece, 20 February 2024, paragraphs 21-22.

<sup>56</sup> See also [The LGBT community and the media: guide for media professionals](#), KMOP - Social Action and Innovation Centre & Colour Youth LGBTQ Youth Athens, Athens 2019.

<sup>57</sup> See UNESCO reports: "[The effects of AI on the working lives of Women](#)" and "[Multistakeholder AI Development: 10 building blocks for inclusive policy design.](#)"

**6) Promotion and use of the Research Centre for Gender Equality (K.E.th.I.) Guide, entitled: “A guide to media for the elimination of sexism and gender discrimination”, as well as planning and promoting new, more inclusive Guides, providing rules on the fair transition to digital world and on new forms of communication, without fostering behavioural models which (re)produce or challenge gender roles.**

### **C. Gender equality in education and culture**

As regards matters relating to school education, the GNCHR has repeatedly highlighted, in all its recommendations<sup>58</sup> to the Greek State and in particular in its latest, included in the 2021 Report on the rights of the child, as regards the implementation of the *International Convention on the Rights of the Child*, the role and importance of education in preventing and fighting discrimination.<sup>59</sup> In this respect, the role of education is explicitly reflected in Article 29 of the *International Convention on the Rights of the Child* according to which education includes among others “...the preparation of the child for responsible life in a free society, in the spirit of understanding, peace, tolerance, equality of sexes, [...]”. The National Commission, having welcomed all the legislative developments to date guaranteeing the principle of non-discrimination in the field of education and training, and in particular the most comprehensive Law 4604/2019 on substantive equality, reiterates that barriers at all levels of education, especially for children belonging to vulnerable groups still persist.<sup>60</sup> It is interesting to note that, according to the [EIGE](#) statistics on the number of students enrolled in Secondary Education by gender in recent years, the number of boys has been slightly but consistently higher. The same applies to the number of registered students in higher education, always according to the [EIGE](#) statistics.

#### **Number of enrolments by gender in Secondary Education**

	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
<b>MIDDLE SCHOOL</b>					
<b>BOYS</b>	<b>169167</b>	<b>172214</b>	<b>173845</b>	<b>177767</b>	<b>178980</b>
<b>GIRLS</b>	<b>154560</b>	<b>157274</b>	<b>158955</b>	<b>162925</b>	<b>164907</b>

<sup>56</sup> See GNCHR website: [EDUCATION](#)

<sup>59</sup>GNCHR [Information](#) [relevant](#) to the implementation of the Convention on the Rights of the Child Submission to the UN Committee on the Rights of the Child, January 3, 2020, page 46 et seq.

<sup>60</sup>See [Concluding Observations](#) on the combined fourth to sixth periodic reports of Greece [CRC/C/GRC/CO/4-6](#), 28 June 2022, paragraph 17, [Written Responses to the List of issues in relation to the combined fourth to sixth periodic reports of Greece to the UN Committee on the Rights of the Child](#), 16 December 2021, [Observations by the GNCHR](#) on the implementation of the UN Convention on the Rights of the Child in Greece, 3 January 2020, page 46 et seq.

HIGH SCHOOL					
<b>BOYS</b>	<b>181042</b>	<b>189451</b>	<b>180898</b>	<b>183694</b>	<b>182346</b>
<b>GIRLS</b>	<b>163851</b>	<b>170359</b>	<b>163103</b>	<b>165280</b>	<b>164883</b>

### *Number of enrolments by gender in Higher Education*

	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
<b>BOYS</b>	<b>51.3</b>	<b>50.6</b>	<b>50.5</b>	<b>50.5</b>	<b>50.4</b>
<b>GIRLS</b>	<b>48.7</b>	<b>49.4</b>	<b>49.5</b>	<b>49.5</b>	<b>49.6</b>

The GNCHR agrees with the conclusions drawn by the *Working Group on the Discrimination against Women and Girls* during its visit to Greece in April 2019,<sup>61</sup> which, while noting good but fragmented practices in combating gender stereotypes in schools, stresses that education is a key area in which gender equality can be fostered and gender stereotypes that hinder women's ability to fully enjoy their rights can be prevented. The [GNCHR Observations](#) in November 2018 on the *2018-2020 National Action Plan on the Rights of the child* are also along the above lines. In its Recommendations on the Action Plan, the GNCHR does insist on the importance of all public or private policies, including of course educational policies, in the development of the child's personality, **with respect to its specific characteristics, such as gender, age, disability, ethnicity**, etc.<sup>62</sup> In its Observations on the *2021-2025 National Action Plan for Gender Equality (ESDIF)*, in September 2021, the GNCHR focusing on the effectiveness of actions, highlights the importance of education and proposes the planning in collaboration with the competent bodies and the promotion of educational material and specialised educational tools in schools, aiming to raise children's awareness of gender-based violence, to deconstruct stereotypes with harmful effects on women and girls, and to prevent, avoid and fight the victimisation of children.<sup>63</sup>

<sup>61</sup> [Report](#) of the *Working Group on discrimination against women and girls in legal, institutional and policy framework*, following its official visit to Greece from 1 to 12 April 2019; a/HRC/44/51/Add.1, 29 June 2020, paragraph 42)

<sup>62</sup> [GNCHR Observations](#) on the 2018-2020 National Action Plan on the Rights of the Child 19 November 2018, page 68)

<sup>63</sup> [GNCHR Observations on the 2021-2025 National Gender Equality Action Plan](#) , 27 September 2021, page 24)



You can find below a list of the National Commission educational activities aimed at raising awareness of the implementation of gender equality in education:

- Educational activity of the GNCHR for the empowerment of women and substantive equality, entitled, *"The status of the Greek woman in history and the modern Greek woman"*, which took place on 11 May 2022 and was broadcast live on the GNCHR website and Facebook.
- Educational activity of the GNCHR for the empowerment of women and substantive equality, entitled *Balancing work and family life*", which took place on 18 May 2022 and was broadcast live on the GNCHR website and Facebook.
- Educational activity of the GNCHR for the empowerment of women and substantive equality, entitled *Combating gender violence through experiential actions and new technologies*, which took place on 1 June 2022 and was broadcast live on the GNCHR website and Facebook.
- Educational activity of the GNCHR for the empowerment of women and substantive equality, entitled, *"The status of the Greek woman in history and the modern Greek woman"*, which took place on 22 June 2022 and was broadcast live on the GNCHR website and Facebook.

In all its inputs to the National Action Plans on human rights issues, the GNCHR underlines, in the context of the proposed methodology, that **the Action Plans should be guided by the principles of non-discrimination, equality and gender mainstreaming**.<sup>64</sup> It is also worth noting that the GNCHR participates with voting rights in the "National Mechanism for Monitoring and Assessment of the Action Plan on the Rights of the Child" established by Law 4491/2017, playing an active role in the monitoring and assessment of the current Plan and the elaboration of the next one. In this context, as it has underlined in its [Recommendations](#), in 2018, on the 2018-2020 National Action Plan on the Rights of the Child (hereinafter ESDDP) and in all its submissions and proposals in thirteen (13) meetings of the Mechanism, it is of fundamental importance to **ensure the participation of children/bodies representing them in the National Mechanism**, always taking into account their specific characteristics, including gender,<sup>65</sup> so that the child's perspective on issues affecting them is provided at all stages of the Action Plan preparation process. Moreover, indicators related to the rights of the child which correspond to the principle of non-discrimination (Article 2 of the UNCRC), should be differentiated on the basis of individual criteria such as gender. The GNCHR highlights at every opportunity the **importance of using appropriate Indicators** to measure the positive and negative impacts of policies and measures to be

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<sup>64</sup> [GNCHR Observations](#) on the 2018-2020 National Action Plan on the Rights of the Child 19 November 2018, page 58)

<sup>65</sup> [GNCHR Observations](#) on the 2018-2020 National Action Plan on the Rights of the Child 19 November 2018, page 68)

implemented, as well as to **monitor the progress made**.<sup>66</sup> The need to develop gender equality indicators fostering gender mainstreaming in all policies<sup>67</sup> and promoting substantive equality is also highlighted in the latest study conducted by the Hellenic Foundation for European & Foreign Policy (ELIAMEP) on gender inequalities in higher education and scientific research in Greece and the role of relevant Action Plans.<sup>68</sup> With the aim of promoting research, as part of its main mission according to its founding Law 4780/2021 as in force,<sup>69</sup> and with regard to gender inequalities, the GNCHR, through its contribution to the *2021-2025 ESDIF*, refers, inter alia, to the conclusions of the initial study conducted by ELIAMEP in 2019 on the main causes of gender inequalities in research and higher education in Greece.<sup>70</sup> It is with regret that the GNCHR is noting today that the conclusions in the corresponding recent study of 2023<sup>71</sup> remain relevant. In particular, according to the two studies of ELIAMEP, albeit significant gender inequalities do exist, the promotion of equality in research and higher education has not so far been a clear objective of the country's government policy. The **total of 24 public Higher Education Institutions and many of the 14 public research centres in Greece**, although they have established Gender Equality Committees (EIF) and Gender Equality Action Plans (SDIF) to promote substantive equality and fight discrimination in their educational, research and administrative procedures, in practice these are likely to remain paper exercises due to **weak support and lack of the necessary human and financial resources**. Our country has one of the lowest rates of women among Universities academic staff (the percentage of women is 35.1%, while the EU average is 41.3%). Moreover, although women in Greece make up the majority of University graduates and hold doctoral degrees in almost equal proportions to men, yet only 37.8% of all researchers (mostly under temporary and part-time contracts) and the majority of research supporting staff are female.<sup>72</sup>

### *Percentage of women in academic staff of Universities, 2021*

	Greece		Average European union	
	Men	Women	Men	Women

<sup>66</sup> GNCHR Observations on the National Action Plan on the Rights of the Child, 19 November 2018.

<sup>67</sup> National Action Plan for Gender Equality (ESDIF): Guidelines & Tools, *Together we formulate policies to promote gender equality in Universities & Research Centres*, August 2023.

<sup>68</sup> Anagnostou Ntia *Gender inequalities in higher education and scientific research in Greece: Can Action Plans promote substantive equality?* Hellenic Foundation for European & Foreign Policy (ELIAMEP), 2023.

<sup>69</sup> Observations by the GNCHR on the 2021-2025 National Action Plan for Gender Equality of the Hellenic Ministry of Labour and Social Affairs, 27 September 2021, pages 36 and 46.

<sup>70</sup> Anagnostou Ntia, "Gender Equality in the Reform of Higher Education in Greece", Policy Paper No 30 Hellenic Foundation for European & Foreign Policy (ELIAMEP), 2019.

<sup>71</sup> Anagnostou Ntia *Gender inequalities in higher education and scientific research in Greece: Can Action Plans promote substantive equality?* Hellenic Foundation for European & Foreign Policy (ELIAMEP), 2023.

<sup>72</sup> SHE figures 2021: Gender in Research and Innovation Statistics and Indicators (European Commission, 2021), page 187) In our country, this data is collected by the National Documentation Centre (EKT), which is also the statistical representative of Greece./ *SHE FIGURES 2021: THE GENDER GAP IN EDUCATION IS NARROWING BUT WOMEN REMAIN UNDER-REPRESENTED IN RESEARCH AND INNOVATION IN GREECE*, 16 March 2022.

Percentage of PhD holders (%)	52.60	47.40	51.90	48.10
Percentage of Universities academic staff of (%)	63.46	36.54	57.68	42.32
Percentage of Universities research staff (%)	62.20	37.80	67.20	32.80
Percentage of research staff in the total number of positions (%)	72.90	56.62	82.80	68.60
Percentage of support staff in the total number of positions (%)	27.10	43.38	17.20	31.40

Data for Greece from She Figures, where gender inequalities in higher education and scientific research are recorded and documented across Europe, indicate that the gender gap in education is narrowing in 2021, but **women are still underrepresented in research and innovation at all three levels of education and** therefore suffer serious consequences, inter alia, in terms of the labour market, limiting career diversification and often placing women in less valued and lower-paid occupations. Similar percentages are also recorded for the year 2024:

#### Percentages of Women in University Academic Staff by Rank, 2024

	Ελλάδα		Μέσος Όρος ΕΕ	
	Άντρες	Γυναίκες	Άντρες	Γυναίκες
Ποσοστό επί των κατόχων διδακτορικού διπλώματος (%)	50,20	49,80	52,40	47,60
Ποσοστό επί της συμμετοχής στη Βαθμίδα Γ	59,90	40,10	53,20	46,80
Ποσοστό επί της συμμετοχής στη Βαθμίδα Β (%)	66,20	33,80	58	42,0
Ποσοστό επί της συμμετοχής στη Βαθμίδα Α(%)	75,70	24,30	70,30	29,70
Ποσοστό επί του ερευνητικού προσωπικού(%)	27,10	40,10	66,30	33,70

Summarising the main findings of the 2024 Report, it can be confirmed that there is gender-balanced representation among those awarded doctoral degrees each year by Greek universities.<sup>73</sup> In the academic field, although there is a slight increase in women's participation at all levels, women continue to be underrepresented compared to men,

<sup>73</sup> ΕΚΤ (2025), Η συμμετοχή των γυναικών στην Έρευνα & Ανάπτυξη στην Ελλάδα. Έκδοση 2024, Αθήνα: Εθνικό Κέντρο Τεκμηρίωσης και Ηλεκτρονικού Περιεχομένου, [She Figures Index 2024: Gender Equality in Research and Innovation-Greece](#)

particularly at the highest academic rank, where the percentage of women stands at only 24.3%. The higher concentration of women in the lower academic ranks is a pattern observed across all EU27 countries. Regarding the participation of women in the country's research personnel, out of a total of 85,714 researchers, 34,387 are women. This corresponds to a share of 40.1%, placing Greece in 9th position among the EU27 countries.

According to data from the National Gender Equality Observatory, the percentage of women employed as higher education staff during the course of the 2019-2020 academic year, amounts to 37.5%.<sup>74</sup> In detail:

2019/ 2020	Men	Women	Total	Proportion Women
University Education	11905	7158	19063	37.5%
Technological Education	70	5	75	6.7%
Professional Education	269	131	400	32.8%
Ecclesiastical Education	57	15	72	20.8%
Total	12301	7309	19610	37.3%

***Educational staff of higher education by gender and discipline, Hellenic Statistical Authority (ELSTAT), 2019/2020***

Additionally, according to the data provided by ELSTAT for the academic year 2022-2023, out of a total of 20,240 individuals comprising the teaching staff in higher education, only 7,629 are women.<sup>75</sup> At the same time, the recently updated measurements by EIGE once again highlight the persistent underrepresentation of women in top academic positions, as well as in positions of high influence.<sup>76</sup> As the following data show, the percentage of women is limited to just 12.5%, while the corresponding figure for men stands at 87.5% (see second chart). Furthermore, the EU average reaches 32.4% for women and 67.6% for men, respectively. More specifically:

<sup>74</sup> See [Information note No 32 – Women and gender segregation in education](#)

<sup>75</sup> Hellenic Statistical Authority, [Higher Education \(University And Technological Sector\) End of Academic Year 2022/2023](#), Results of Research, 7 May 2025.

<sup>76</sup> [European Institute for Gender Equality, National academies of science: presidents and members of the highest decision-making body, 2025](#)

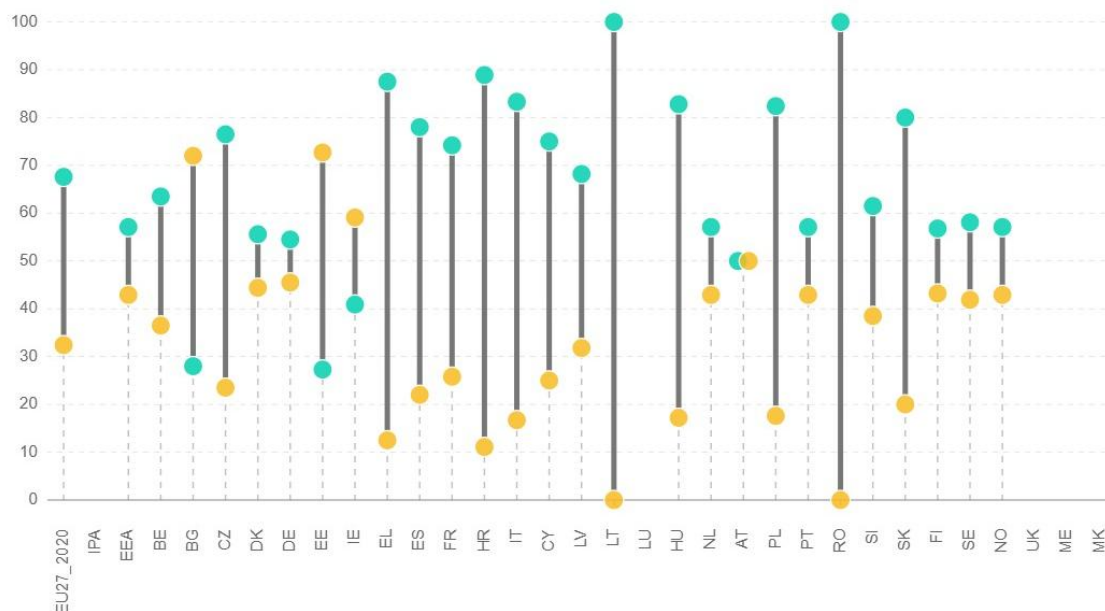
**Educational staff of higher education by gender and discipline, Hellenic Statistical Authority (ELSTAT), 2022/2023**

2022/2023	Men	Women	Total	Proportion Women
University Education	12.253	7.466	19.719	37,88%
Technological Education	73	5	78	6,41%
Professional Education	240	140	380	36,84%
Ecclesiastical Education	45	18	63	28,57
<b>Total</b>	<b>12.611</b>	<b>7.629</b>	<b>20.240</b>	<b>37,69</b>

**Educational staff of higher education by gender and Member-State, EIGE 2025<sup>77</sup>**

• Men

• Women



<sup>77</sup> Indicator: National academies of science: presidents and members of the highest decision-making body, Gender Statistics Database, European Institute for Gender Equality

Of particular concern are persistent negative practices that persist over time, despite the measures taken by the Administration, regarding the education and training of girls and women respectively, belonging to vulnerable groups, such as Roma, migrant women and LAT women. Apart from continuously monitoring the development of the issues in question and public information, the GNCHR seeks through a series of educational and awareness-raising actions to improve the adverse position of women and girls.<sup>78</sup> The GNCHR reiterates in all its proposals the *Joint General Recommendation No. 31 of the Committee on the Elimination of Discrimination against Women*<sup>79</sup> on the obligation of the authorities to adopt **i)** awareness-raising measures on the harmful effects of child marriage on the physical and mental health and well-being of girls, targeting in particular the Roma community and the Muslim minority in Western Thrace, **ii)** prevention measures against female genital mutilation for migrant and refugee girls, as well as **iii)** measures to support intersex children. In all the above cases, the GNCHR argues that the State's response, along with other measures to support families, has to be through the field of education.



### *i) Roma women and girls*

In the light of the above, the GNCHR has been deeply concerned in recent years about<sup>80</sup> the case of Roma girls and women. The National Commission monitors the progress made by the authorities with the integration of Roma children in school education, but remains **highly concerned about Roma girls' access to school attendance**, as they suffer multiple discrimination and exclusion with key problems such as a) high school drop-out rates, and (b) early or forced marriages. The GNCHR has consistently expressed these concerns to the relevant UN Committees at every opportunity, and has recently reiterated them in *its Observations to the UN Committee on the Rights of the Child, in 2020 and 2021* and to the UN

See GNCHR website: [EDUCATION - RESEARCH AND NEWS](#)

<sup>79</sup> See [Joint general recommendation No. 31 of the Committee on the Elimination of Discrimination against Women/general comment No. 18 of the Committee on the Rights of the Child on harmful practices](#), CEDAW/C/GC/31-CRC/C/GC/18, 14 November 2014.

<sup>80</sup> [GNCHR Contribution to the preparation of the New National Strategy for the Social Inclusion of Roma for the period 2021-2027](#), 8 March 2021, pages 21- 22, 25-26.



*Committee on the Elimination of Discrimination in 2021.*<sup>81</sup> The **Panhellenic Confederation of Greek Roma (ELLAN PASSE)**, participating with voting rights in the Plenary of the National Commission, has expressed its deep concern on the issue in a written Note on 12 October 2020, in addition to references during the GNCHR Plenary.<sup>82</sup>

According to the results of a survey published by the Fundamental Rights Agency, only one in four girls in Greece, has access to primary education, making the country an exception compared to the other European countries under review. It is worth mentioning that for boys of the same age, the ratio is over one in three.<sup>83</sup>

Already in 2018 and 2019, the GNCHR, noting on the one hand the **Roma women lack of access to justice** and on the other hand the **lack of proper information** on this issue **and awareness-raising among lawyers**, participated as a **partner in the Council of Europe's JUSTROM programme** for the empowerment of Roma women victims of gender-based violence and their effective access to justice through awareness-raising and training of lawyers to report incidents and perpetrators. In this context the GNCHR: **i)** co-organised with the relevant Bar Associations Educational Seminar in collaboration with JUSTROM Greece, Educational Seminar for lawyers in Athens-Thessaloniki-Xanthi on the fight against discrimination and the access to justice for Roma women (April 2018-March 2019),<sup>84</sup> **ii)** participated in the JUSTROM Round Table (18 March 2019), and **iii)** participated in a closed discussion among relevant bodies on problems of legal assistance to Roma in the Special Secretariat for Social Integration of Roma in Greece (11 February 2019). In December 2020, in the context of the JUSTROM programme, the National Commission also participated in a thematic one-day conference for the access of Roma to education.<sup>85</sup>

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<sup>81</sup> [GNCHR Written Responses](#) to the List of issues in relation to the combined fourth to sixth periodic reports of Greece to the UN Committee on the Rights of the Child, 2021, pages 8-10, [Observations](#) on the National report submitted in accordance with par. 5 of the annex to HRC Resolution 16/21.

in view of the Third Cycle of Universal Periodic Review (UPR) of Greece during the UN Human Rights Council's 39th Session 30.7.2021, page 19, GNCHR [Observations](#) on Greece's combined 23rd and 24th periodic report to the Committee on the Elimination of Racial Discrimination (CERD) of the International Convention on the Elimination of All Forms of Racial Discrimination, July 2021, p. 27, GNCHR [Information relevant to the implementation of the Convention on the Rights of the Child Submission to the UN Committee on the Rights of the Child in Greece, January 2020](#), pages 47-49.

<sup>82</sup> ELLAN PASSE in its memorandum to the GNCHR dated 12.10.2020 stressed the great importance of education especially for Roma women, who often leave school to enter into early marriage and give childbirth, and the need to give them the opportunity to attend second chance schools along with their children.

<sup>83</sup> European Union Agency for Fundamental Rights, [Roma Survey, 2022](#) p. 36-37

<sup>84</sup> [JUSTROM 2](#) is a joint programme of the Council of Europe and European Commission aiming to improve access of Roma women to justice including theoretical and practical, information and awareness-raising trainings among lawyers on human rights issues, fighting racism and access of Roma women to justice, collaboration with national bodies for the protection and promotion of human rights, reinforcing structures and providing tools for handling Roma-related cases, building on JUSTROM's experience so far. The local Bar Associations participated in this co-organisation, by ensuring provision of premises and information to their members.

<sup>85</sup> One-day Conference entitled: [Access of Roma to Education and Justice institutions: Barriers and Proposals](#), 12.12.2020.

Having a full picture of both the reality on the field and the real and legal difficulties, the GNCHR draws the attention of the State to the key role of awareness-raising, provision of information, participation and mobilisation of Roma women with a view to building a comprehensive policy for the integration of Roma women at regional and, in particular, local level. This has been a firmly held position of the National Commission, which it has strongly supported in the planning and preparation of all Action Plans, including the Action Plan for the Child.



For its part, the National Commission cites the following actions in the context of its mission, aiming at a broader awareness of Roma issues:

- GNCHR interview with the Coordination Group of the Roma Women Association of Dendropotamos on the participation of Greece in the pilot project “Roma Civil Monitor”, 20 May 2022.
- GNCHR training seminar at the invitation of the Roma Women Association of Dendropotamos in the context of the 2<sup>nd</sup> educational three-day Roma Political School 2022, during which the GNCHR, presented its work and related actions, on: “*The role of the GNCHR in the protection of Roma rights in Greece*”, Athens, 11-13 November 2022.
- GNCHR training seminar on: “*Public Administration and Roma - the Right of Access to Education*” for employees at the Municipality of Igoumenitsa who interact and deal with Roma people (mainly the Social workers of the Municipality), on issues related to social integration of Roma women as victims of multiple discrimination, on 10 May 2022.



- Statement by the President of the National Commission for Human Rights (GNCHR) Maria Gavouneli during the two-day event held in Strasbourg, marking the closure of the JUSTROM 3 programme on access of Roma women to justice, on 23 and 24 February 2022.
- Participation of the GNCHR in the training programme under the project: “ROMA PLATFORM 2020 – Development of the National Platform for Consultation and Dialogue on Roma issues of the National Roma Contact Point”, on “*The role and guidelines of International Organisations and Independent Authorities*”, organised by the *General Secretariat for Social Solidarity and Fight against Poverty of the Ministry of Labour and Social Affairs*, on 18-19 March 2020.
- Visit of Mrs. Giannoula Magga and Mrs. Antonia Magga, President and Member correspondingly, of the Roma Women Association of Dendropotamos at the premises of the GNCHR, for an overall discussion with representatives of the GNCHR and the Assistant Coordinator of the Racist Violence Recording Network, focusing on issues of empowerment of Roma women and children and fight against social exclusion, on 9 June 2022.
- GNCHR presentation on the “*The right of Roma to health. Challenges faced by Roma Women and the role of the GNCHR*”, in the final conference of the programme on “REACH: Roma women’s Empowerment and fighting discrimination in access to Health (<https://romahealth.eu/>) funded by the European Union’s Rights, Equality and Citizenship Programme 2014 – 2020 with a view to combating discrimination against Roma and promoting equal access, of Roma women particularly, to health services, focusing on sexual and reproductive health, on 6 September 2022.
- Meeting of the GNCHR with the Council of Europe Commissioner for Human Rights, Mr. Michael O’Flaherty, at the Commission’s offices in Athens, on 5 February 2025. The GNCHR once again emphasized the need to ensure the right to access education and expressed its concern over reports of incidents of arbitrariness against Roma citizens. It also referred to the lack of social inclusion policies and the adverse situation of Roma women and girls, who, despite their potential to act as key agents of change within their communities, continue to bear the greatest burden of discrimination and social exclusion on a daily basis.<sup>86</sup>

## *ii) LGBTQI+persons*

With regard to issues related to LGBTQI+persons, the GNCHR has welcomed the adoption of Law 4443/2016 on the promotion of the principle of equal treatment and the fight against discrimination and Law 4491/2017 on the legal recognition of gender identity, as well as the elaboration of *the National Strategy for LGBTQI+ persons equality* in 2021. More specifically, with regard to issues related to education, the GNCHR had already in 2015, included in its recommendations to the State the **need for conducting the course of**

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<sup>86</sup> Meeting of the GNCHR with the Council of Europe Commissioner for Human Rights, Mr. Michael O’Flaherty, 5 February 2025. See also Council of Europe Commissioner for Human Rights, *Memorandum on the human rights of Roma in Greece*, 16 May 2025.

**sexuality education in a proper way at all educational levels**, through curricula on different sexualities and gender identity, using correct and impartial language and terminology, in accordance with Article 11 of the European Social Charter.<sup>87</sup> In December 2021, in its Written Responses to the List of issues in relation to the combined fourth to sixth periodic reports of Greece to the UN Committee on the Rights of the Child, the GNCHR welcomed the establishment and compulsory operation of “Skills Workshops” in all kindergartens and primary and secondary schools, including sex education courses, which was part of the school curricula on a pilot basis from the 2020-2021 school year. However, **it is noted that the course does not include topics making direct reference to sexual orientation, gender expression, and identity and gender characteristics**. Today, the National Commission remains concerned about the persistence of sexist stereotypes in practice, in terms of the curricula and teaching material at schools as well as the teachers’ approaches.<sup>88</sup> In its [Memorandum](#) to the Committee on the preparation of the National Strategy for Equality of LGBTIQ+ persons in June 2021, the National Commission is pointing out the **role of education in removing sexist and gender identity stereotypes** and certainly the crucial importance of political will in order to mobilise and raise awareness of each competent body. Recently in its [Observations on the 2022-2027 National Action Plan for the Protection of Children against Sexual Abuse and Exploitation](#), in December 2022, the GNCHR, taking into account that **keeping kids informed and aware of the risks of sexual abuse and exploitation and ways of being protected is a fundamental obligation of the State** and must be provided at all school levels according to the [Lanzarote Convention](#) (Article 6 *Education for children*), welcomed the initiatives of the Ministry of Education, Religious Affairs and Sport to include in the compulsory school programme the “Skills Workshops” which, among other things, attempt to promote sexuality education.<sup>89</sup> At the same time, it expressed its constant concern that through the “Skills Workshops”, sexual health, contraception and the effects of pornography, physical and digital harassment are being taught, as shown by the relevant educational material,<sup>90</sup> **instead of a comprehensive sex education**,<sup>91</sup> which is even taught in the classroom by teachers of all specialties serving in the school unit and **not by properly trained teachers for this purpose**. The GNCHR encourages the competent State authorities to take comprehensive systematic measures for

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<sup>87</sup> GNCHR [Report and Recommendations](#): Transgender Persons and Legal Recognition of Gender Identity, Transgender persons and Legal Recognition of Gender identity, October 23, 2015, pages 5- 26, 35, 58.

<sup>88</sup> [GNCHR Written Responses](#) to the List of issues in relation to the combined fourth to sixth periodic reports of Greece to the UN Committee on the Rights of the Child, December 2021, pages 8-10. [Information relevant to the implementation of the Convention on the Rights of the Child, GNCHR Submission to the UN Committee on the Rights of the Child](#) January 2020, pages 30, 49.

<sup>89</sup> [Observations on the 2022-2027 National Action Plan for the Protection of Children from Sexual Abuse and Exploitation](#), 1 December 2022, pages 34-36.

<sup>90</sup> See the relevant printed material entitled: *I discover my body - sexuality education* “[The evolution of adolescent relationships from yesterday to today](#)” on the website of the Institute of Educational Policy (IEP).

<sup>91</sup> [UNESCO’s Comprehensive Sexuality Education Implementation Toolkit](#) for the design or review of a comprehensive sexuality education, [International technical guidance on sexuality education: An evidence-based approach](#), , 2018, UN - [Comprehensive sexuality education for young people](#)..



compulsory sex education in schools and vocational high schools by cultivating respect for diversity,<sup>92</sup> emphasising on specific issues and aspects relating to LGBTQI+ persons,<sup>93</sup> in accordance with the [General Recommendation No. 36 \(2017\) on the right of girls and women to education](#), of the *Committee on the Elimination of Discrimination against Women*,<sup>94</sup> underlining that **the available educational material does not seem to promote respect and tolerance for diversity in schools**, nor does it reflect the gender and sex dimension. In its recent [Observations](#) in March 2023, on the Draft Bill «...to prevent and address violence and bullying at schools and other provisions» (Law 5029/2023),<sup>95</sup> **the GNCHR reiterates to the State that it holds educational material covering almost the entire range of human rights**, which it has prepared and developed as part of its mission to foster respect for human rights within the education system (Article 12 (f) of Law 4780/2021). The GNCHR calls on the **State to make use of its expertise and experience** in the preparation of informative and training material for teachers and school community professionals, insofar as it relates to human rights and respect for diversity.<sup>96</sup> Furthermore, as regards the same issues, the National Commission in its [Observations](#) on the above mentioned law, expressed its particular satisfaction for the amendment of the original provision and the insertion of a new paragraph in the Draft Bill submitted to Parliament, aligned with the positions of the Greek Transgender Support Association (SYD) and LGBTQI+ organisations, so that **insults**

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<sup>92</sup> See GNCHR [Written Responses](#) to the List of issues in relation to the combined fourth to sixth periodic reports of Greece to the UN Committee on the Rights of the Child, December 2021, pages 8-10. [Information relevant to the implementation of the Convention on the Rights of the Child, GNCHR Submission to the UN Committee on the Rights of the Child, 3 January 2020](#), pages 46-54, Recommendations of the Committee on the Rights of the Child [Concluding Observations on the combined 4th to 6th periodic reports of Greece : Committee on the Rights of the Child, CRC/C/GRC/CO/4-6, 28.6.2022](#), paragraphs 17 and 18. See also the GNCHR Statement: [Ensuring the early start of the school year for children with disabilities and/or special educational needs](#), 22 July 2016.

<sup>93</sup> [Institute of Educational Policy \(iep.edu.gr\)](#)

- <https://rainbowschool.gr/>

- Experimental Middle School of Rethymno, [Teacher's Manual](#) (3th grade of Middle School)

<sup>94</sup> The Committee on the Elimination of Discrimination against Women calls on States Parties to make sexual education compulsory and to provide it "systematically" to schools, including vocational high schools ([General Recommendation No. 36 \(2017\) on the right of girls and women to education](#)). The Committee on the Rights of the Child similarly recommends that States Parties integrate sexuality education into the standard curricula for primary and secondary education and has expressed concern about any programmes that allow parents to opt out on behalf of their children; [UNESCO's online toolkit](#) for the planning or revision of integrated sexuality education programmes, Centre for Reproductive Rights, [An International Human right: Sexuality Education for Adolescents in Schools](#), 9 January 2008.

<sup>95</sup> [Observations on the](#) draft Bill of the Ministry of Education, Religious Affairs and Sport entitled "We live together in harmony -We break the silence": Arrangements to prevent and respond to violence and bullying in schools and other provisions", 8 March 2023, pages 17-19.

<sup>96</sup> See on the website of the Institute of Educational Policy the relevant printed material under the title: I discover my body - sexuality education, ["The evolution of adolescent relationships from yesterday to today"](#). See also the website of the [Community Intersex Greece](#) and the website of the [Rainbow School](#) especially the [Campaign for an Inclusive Comprehensive Sexuality Education](#) and the [Campaign PROhorao](#).

to religious beliefs, ethnic origin, sex, sexual orientation, gender identity, gender expression or gender characteristics are listed among the types of bullying.<sup>97</sup>

### *iii) Women and girls with disabilities*

The GNCHR must point out that **gender mainstreaming is still not specifically addressed in measures for women and girls with disabilities**. As it has repeatedly stressed, the Government has a fundamental obligation to revise its legislation on equal treatment and fight against discrimination (Law 4443/2016), to extend the scope beyond the fields of work and employment. In particular, it is recommended that its scope is extended to include education (not only vocational education), at in all forms in which education services are provided (e.g. Institutes for foreign languages). In this light, there is a substantial **need to extend the concept of reasonable adjustments in the field of education and training**, which is particularly important for the full and equal enjoyment of the rights of women and girls with disabilities.<sup>98</sup> While **Law 4443/2016** revised the meaning of reasonable accommodation, employment and work remain their main focus. In the recent **Law 5023/2023**, which provides, *inter alia*, for the extension of the principle of equal treatment irrespective of disability and/or chronic disease, no reference is made to **the access of girls with disabilities to school**. The GNCHR has no option but to reiterate that access of children with disabilities to inclusive and non-discriminatory education is a key prerequisite for their integration into the social fabric, just like awareness of their rights and familiarisation with them are key requirements for the fulfilment of their rights.<sup>99</sup> This need is most ever-increasing in cases of girls of vulnerable categories, such as girls with disabilities and/or chronic diseases, experiencing learning difficulties, Roma girls, girls of a migrant or refugee profile, who are at greater risk of social exclusion and victimisation.

According to the 36th Information Note of the Observatory of the General Secretariat for Equality and Human Rights (GSEHR), which presented part of the statistical data from the Survey on the Situation of Women with Disabilities, 20% hold a university or technical degree, 30% have completed high school, and 5% have graduated from a vocational school.<sup>100</sup> Women with disabilities also face educational gaps, not only compared to men but also in relation to women without disabilities. More than one in three (34.7%) reached only preschool, primary, or lower secondary education levels (up to high school). In more detail:

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<sup>97</sup> GNCHR [Observations](#) on the Draft Bill of the Ministry of Education, Religious Affairs and Sport entitled “We live together in harmony – break the silence”: Arrangements to prevent and respond to violence and bullying in schools and other provisions”, 8 March 2023, pages 15- 17 and 21.

<sup>98</sup> See **Greek National Confederation of Persons with Disabilities (ESAMEA)**: Policy Text, [WOMEN AND DISABILITY Multiple identities, multiple challenges](#) Observatory on Disability Issues, 2019.

<sup>99</sup> See [UN-The Right to Human Rights Education](#)

<sup>100</sup> 36<sup>o</sup> Information Note from the Observatory of the General Secretariat for Equality and Human Rights, [Women with disabilities, 2024](#)

### ***The situation of women with disabilities by level of education***

Level of Education	Percentage (%)
University or Technological Degree	20%
High School Diploma	30%
Vocational School	5%



In the light of the above the GNCHR addresses the following recommendations to the Greek State:

- 1. The GNCHR calls on the competent authorities to plan and promote systematic awareness-raising and knowledge-dissemination actions on gender equality issues for the younger generations through education at all levels and through the implementation of specific, stable and coherent educational programmes, as well as through relevant cultural initiatives, aimed at combating gender inequalities.***
- 2. The GNCHR calls on the national competent authorities to integrate gender equality in pre-school, primary, secondary and higher education, and to adapt accordingly the content of school curricula taught to girls and boys, as an important factor that can mitigate or exacerbate gender inequalities. With regard to higher education, it should be borne in mind that the stereotypes that persist in education and occupational options available to women help to preserve inequalities.***
- 3. The National Commission recommends that the competent State authorities implement "Skills Workshops" accompanied by continuous training of already qualified personnel. At the same time, school curricula should be designed on the basis of the [UNESCO toolkit](#) guidelines in order to equip students with knowledge, attitudes, values***



*and skills that are appropriate for the development of social and sexual relations based on respect.*<sup>101</sup>

*4. The GNCHR calls on the State to use its expertise and experience in preparing information and training material for teachers and professionals of the school community, in so far as it relates to issues of human rights and respect for gender equality.*<sup>102</sup>

*5. In addressing violence and school bullying against girls and feminites and recognising both the institutional and social role of the school,<sup>103</sup> the GNCHR recommends systematic awareness-raising among all members of the school community, teachers, students and their families. At the same time, it recommends that guidelines on how to deal with multidisciplinary discrimination against female students be sent to all primary and secondary schools, in particular those belonging to vulnerable groups, i.e. on the grounds of disability, chronic illness, ethnic origin, sexual orientation, identity, expression, gender characteristics or marital status, in accordance with the principle of non-discrimination (Article 2), the best interests of the child (Article 3) and the child participation (Article 12) of the International Convention on the Rights of the Child (CRC).*

*6. The GNCHR calls on the competent bodies to join forces to design long-term policies aimed at effectively addressing the issue of Roma girls dropping out of school due to early marriage or maternity and to take immediate action to combat anti-Gypsyism and ensure access to inclusive education.*

#### **D. Equal participation of women in work**

Since its establishment, the GNCHR has been closely monitoring and attached the utmost importance to issues related to the promotion and protection of individual and collective labour rights, as well as rights related to the protection of working conditions of employees, including the adaptation of Greek legislation to the provisions of EU law, as evidenced by its regular reports, repeated statements and other interventions.<sup>104</sup> Based on its performance, in terms of equal access of women and men to employment and good working conditions, Greece, according to EIGE comparative data,<sup>105</sup> is consistently ranked at the bottom of the

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<sup>101</sup> UNESCO online toolkit for designing or reviewing programs on comprehensive sexuality education (CSE), Centre for reproductive Rights: An International Human right: Sexuality Education for Adolescent in Schools, 9.1.2008.

<sup>102</sup> See on the website of the Institute of Educational Policy the relevant printed material under the title: I discover my body - sexuality education, "[The evolution of relationships in adolescence from yesterday to today](#)". See also the website of the [Community Intersex Greece](#) and the website of the [Rainbow School](#) especially the [Campaign for an Inclusive Comprehensive Sexuality Education](#) and the [Campaign PROhorao](#).

See GNCHR website: [Education-Research](#)

<sup>104</sup> GNCHR Website, DECISIONS-POSITIONS: [EMPLOYMENT](#)

<sup>105</sup> EIGE Web page [Gender Equality Index](#)



list of the EU countries. Indicatively for 2024 Greece, with a score of 69.4 out of 100, is ranked second to last (Italy is last), for 2023 Greece with a score of 68.7 out of 100 is ranked third from the bottom in the EU, while for 2022 with a score of 65.6 out of 100, it is ranked second to last in the EU (Italy is last), with the average total equality index being 74.2 in 2024, 73.8 in 2023 and 71.7 in 2022 correspondingly.<sup>106</sup> It is noted that Greece has shown a 3.8% improvement since 2022 in the labour sector due to the faster progress made, compared to other EU countries, moving up 3 places.

### Gender equality at work

Gender equality at work	2022		2023		2024	
	Greece	EU	Greece	EU	Greece	EU
Index of equal access to work	72.8	81.1	73.0	82.3	74.9	83.3
Quality index of working conditions	59.1	63.3	64.6	66.2	64.3	66.1
Total Equality Index	65.6	71.7	68.7	73.8	69.4	74.2

Of further interest are the indicators relating to the full-time employment rate by gender and the length of working life in years by gender, where men exceed women in both areas.

### Full-time employment participation rate by gender, 2024

EL-W	34
EL-M	53
EU-W	42
EU-M	57

Source: Eurostat, EU LFS, 2021. EIGE's calculations.

### Length of working life in years by gender, 2024

<sup>106</sup> See Gender Equality Index 2022 (Greece Gender Equality Index 2023) and Gender Equality Index 2022 - Gender Equality Index 2022, the COVID-19 pandemic and care).



Source: Eurostat, EU LFS, 2022. Ifsi\_dwl\_a.

It certainly needs to be borne in mind, as the GNCHR has highlighted in all its labour rights related texts, that the disproportionate impact of the national financial crisis and the austerity measures since 2009, followed by the Covid-19 pandemic in 2020 and the urgent restrictive employment measures taken to address with it, have disproportionately affected women's labour rights. Greece, according to the Gender Equality Index for 2022, is among the EU Member States that, even though their Gender Equality Index scores have improved, still remained consistently and significantly below the EU average throughout the pandemic period and to date. Moreover, the progress in achieving equality has been slower, thus ensuring increasing inequalities over time compared to the EU average.<sup>107</sup>

Since the beginning of the financial crisis, in 2009, the Commission has never stopped reporting on the negative impact of austerity measures on labour rights, especially for women. In its Thematic Factsheet on the [Impact of Economic Reform Policies and Austerity Measures on Human Rights](#),<sup>108</sup> including all *Statements* and *Recommendations* made by the GNCHR during the period of the financial crisis with emphasis on the consequences on labour rights and social security rights, the constant finding that there has been a clear regression in the protection of women's labour rights as a result of austerity measures is reflected in various ways, with a reiteration of its *Recommendations* to the State to promote equal opportunities, impose quotas, ensure the right to flexible working hours, protect maternity, etc. Since 2011, the *Committee of Experts on the Application of Conventions and Recommendations* (hereinafter, [CEACR](#)) of the International Labour Organisation (hereinafter, ILO) in its Reports on Greece, has expressed its concerns about the "disproportionate impact" of the crisis and the austerity policies and restrictive measures against women's trade union freedom, with major consequences for their right to decent work, such as the widening of the wage gap against them and their employment under precarious contracts and working conditions.<sup>109</sup> Here, the landmark *Statements* and *Recommendations* of the GNCHR, as well as the intervention of the *European Network of*

<sup>107</sup> Gender Equality Index 2022, *The COVID-19 pandemic and care* ([Gender Equality Index 2022, The COVID-19 pandemic and care](#)), p. 22-23.

<sup>108</sup> GNCHR Thematic Factsheet on the Impact of Economic Reform Policies and Austerity Measures on Human Rights, 16.09.2019.

<sup>109</sup> *Employment Policy Convention, 1964 (No. 122)*, Direct Request (CEACR) 2020.

*National Human Rights Institutions on the Impact of Economic Reform Policies on Human Rights:*

[GNCHR Recommendation and decisions of international bodies on the compatibility of austerity measures with international human rights protection rules](#), June 2013.

[Open letter from the President of the European Network of National Human Rights Institutions, Mr. Alan Miller to the President of the European Commission José Manuel Barro and the President of the European Central Bank, Mr Mario Draghi](#), January 2014.

[Statement by the National Commission on Human Rights \(GNCHR\) on the effect of the ongoing austerity measures on human rights](#), June 2015.

[Urgent Statement on Labour and Social Security Rights in Greece](#), April 2017.

[GNCHR Urgent Statement on the provisions put forward in the "Omnibus Development Bill" on collective labour law](#), September 2019.

The GNCHR remained vigilant since the outbreak of the Covid-19 pandemic crisis in 2020, and with the economy not fully recovered, about closely monitoring the restrictive measures taken to address it and their impact on human rights. In its two reports on the Covid-19 pandemic, in June 2020 and in May 2021 (Reference Report), posted on the Commission's website under a separate heading "[COVID 19 and Human Rights Protection](#)",<sup>110</sup> it highlighted, among other things, the risks in relation to the right to work and social security and safety, with an emphasis on the impact of measures on equality between men and women in the workplace. As mentioned in both Reports, the urgent restrictive measures in the employment sector to tackle the Covid-19 pandemic, such as flexible working hours and teleworking without a comprehensive regulatory framework, have exacerbated already existing inequalities. In both its reports, the National Commission draws the State's attention to the risks posed to the equal enjoyment of women's rights of access to employment and social security in the public and private sectors and precariousness, notably in terms of pay and working conditions based on gender, and calls on the competent State bodies to apply the fundamental constitutional principles of proportionality and social solidarity in order to maintain a fair balance between the parties and interests concerned.<sup>111</sup> This is also the spirit of its Recommendations in its Observations on the *Draft Bill of the Ministry of Labour and Social Affairs on Labour Protection*, etc. (hereinafter referred to as the

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<sup>110</sup> GNCHR, [Report](#) on the need to protect human rights when taking measures in response to Pandemic COVID-19 and recommendations to the State. Meetings of 8, 22, 29 April and 6 May 2020, June 2020, page 8 GNCHR [Reference Report](#) on the impact of the pandemic and the measures taken in its response on human rights and recommendations to the State, 19 May 2021, pages 16, 24- 28, 55, 65.

<sup>111</sup> GNCHR [Report](#) on the need to protect human rights when taking measures in response to Pandemic COVID-19 and recommendations to the State. Meetings of 8, 22, 29 April and 6 May 2020, June 2020, GNCHR, [Reference Report](#) on the impact of the pandemic and the measures taken in its response on human rights and recommendations to the State, 19 May 2021.

Observations on the Draft Bill 4808/2021),<sup>112</sup> in June 2021, as well as in its Observations on the 5th Greek Report on the implementation of the *Revised European Social Charter*,<sup>113</sup> in January 2021. It is worth mentioning that the GNCHR acknowledges in its Reports on the Covid-19 pandemic and in all its relevant Reports, the positive impact of the measures taken to protect labour during the crisis, such as the suspension of workers' employment contracts, the provision of financial assistance as a special purpose allowance and the prohibition of dismissals for companies.<sup>114</sup>

The consistently low employment rate of women in Greece compared to that of women in the EU, was also highlighted by the *UN Working Group on Discrimination against Women in law and in practice* in its 2019 Report following its official visit to Greece from 1 to 12 April 2019.<sup>115</sup> In its 2020 report on Greece, [CEACR also referred to](#) the conclusions on women's labour rights in Greece reached by the UN Working Group, in particular with regard to the inadequate implementation of the law in practice despite the satisfactory existing legal and policy framework, the persistence of discrimination and the prolonged effects of the crisis and austerity measures, calling on the Government to take all necessary measures.<sup>116</sup> In fact, the [CEACR](#) recommended that the Government cooperate with the employers' and workers' organisations, the Greek Ombudsman and law enforcement authorities in order to assess and address the issues identified by the *Committee on the application of standards* of the ILO. It also requested the Greek Government to keep it fully informed on specific measures implemented to this end, within the framework of the *ESDIF* or other Action Plan, as well as

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<sup>112</sup> [GNCHR Observations on the Draft Bill of the Ministry of Labour](#) and Social Affairs, entitled: "On Labour Protection - Establishment of the Independent Authority Labour Inspectorate Ratification of the ILO Convention No. 190 on violence and harassment in the world of work Ratification of the ILO Convention No. 187 on the Promotional Framework for Occupational Safety and Health at Work Incorporation of Directive (EU) 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance for parents and carers", 14 June 2021, pages 37- 42, 53-54.

<sup>113</sup> [Observations by the GNCHR on the 5th National Report on the implementation of the Revised European Social Charter](#) (Reference Period 01/01/2017 - 31/12/2020) 11 January 2022, pages 14-15.

<sup>114</sup> See GNCHR, [Thematic Factsheet](#) on the Impact of Economic Reform Policies and Austerity Measures on Human Rights(2019), GNCHR, [Report](#) on the need to protect human rights when taking measures in response to Pandemic COVID -19 and recommendations to the State. Meetings of 8, 22, 29 April and 6 May 2020, June 2020, page 6 GNCHR, [Reference Report](#) on the impact of the pandemic and the measures taken in its response on human rights and recommendations to the State, 19 May 2021, page 60 et seq., [GNCHR Urgent Statement on the provisions put forward in the "Draft Development Bill" on collective labour law](#), 19 September 2019, [GNCHR Urgent Statement on labour and social security rights in Greece](#), 28 April 2017, [Observations](#) by the GNCHR on the Bill of the Ministry of the Ministry of Justice, Transparency and Human Rights "Implementation of the principle of equal treatment regardless of race, colour, national or ethnic origin, genealogical origins, religious or other beliefs, disability or chronic disease, age, marital or social status, sexual orientation, identity or gender characteristics and other provisions", 20 September 2016.

<sup>115</sup> [Report](#) of the *UN Working Group on discrimination against women and girls in legal, policy and institutional framework*, following its official visit to Greece from 1 to 12 April 2019; A/HRC/44/51/Add.1, 29 June 2020, paragraphs 19, 20, 21, 27-29, 32.

<sup>116</sup> [Direct Request \(CEACR\)](#) - adopted 2020, published 109th ILC session (2021) - / Committee of Experts on the Application of Conventions and Recommendations.

on any barriers identified and the results achieved.<sup>117</sup> From this perspective, the GNCHR shares the findings of the Labour Institute of the General Confederation of Hellenic Workers (GSEE), according to which, due to the crisis of the Covid-19 pandemic, gender inequality was intensified, especially among young people, in a labour market where gender equality had not been achieved even before the onset of the crisis.<sup>118</sup>

In July 2021, the GNCHR in its *Observations* on the National Report submitted in accordance with par. 5 of the annex to HRC resolution 16/21 in view of the Third Cycle of Universal Periodic Review (UPR) of Greece during the UN Human Rights Council's 39th Session in an overall assessment of the latest positive developments toward addressing the gender mainstreaming in labour,<sup>119</sup> highlighted, *inter alia*, the transposition of the EU Directives on gender equality in the national legal order (Law 4443/2016),<sup>120</sup> the appointment of the Greek Ombudsman as a body for the promotion of the principle of equal treatment with an enhanced supervisory mandate,<sup>121</sup> as well as several initiatives undertaken by the General Secretariat for Family Policy and Gender Equality (GGDOPIF) now General Secretariat for Equality and Human Rights (GGIAD) (see Annual Reports on Violence Against Women, Workshops, Gender Equality Observatory).<sup>122</sup> It is worth mentioning that the GNCHR has welcomed the implementation of the "Pegasus" project,<sup>123</sup> which includes policy proposals to address the existing gender gap in the field of pensions, on a multi-level basis, in order to address, *inter alia*, the shortcomings of the recent Law 4387/2016.<sup>124</sup> **There is still a persistent lack of reliable statistics on gender discrimination in the workplace in Greece.**<sup>125</sup>

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<sup>117</sup> [Direct Request \(CEACR\)](#) - adopted in 2020, published 109th ILC session (2021) - / Committee of Experts on the Application of Conventions and Recommendations

<sup>118</sup> Labour Institute of the General Confederation of Hellenic Workers (GSEE) [The 2020 Annual Report on the Greek economy and Employment](#), October 2020 pages 10, 13- 16, 17, 40.

<sup>119</sup> [GNCHR Observations](#) on the National report submitted in accordance with paragraph 5 of the annex to HRC resolution 16/21 in view of the Third Cycle of Universal Periodic Review (UPR) of Greece during the UN Human Rights Council's 39th Session, 30 July 2021.

<sup>120</sup> Transposition of the Council Directive 2000/43/EC of 29 June 2000 implementing the principle of equal treatment between persons irrespective of racial or ethnic origin, of the Council Directive 2000/78/EC of 27 November 2000 establishing a general framework for equal treatment in employment and occupation.

<sup>121</sup> See [the Greek Ombudsman's website as an Equal Treatment Body](#)

<sup>122</sup> [General Secretariat for Equality and Human Rights](#)

<sup>123</sup> [PEGASUS: Addressing the gender pension gap in Greece](#): A project implemented with the cooperation of the General Secretariat for Equality and Human Rights (coordinating body), the Research Centre for Gender Equality (K.E.th.I.) and the National Centre for Social Research (EKKE) and funded by the EU Programme, "Rights, Equality and Citizenship Programme 2014-2020" Its main objective is to enhance the existing knowledge about the gender pension gap in Greece and to fill all relevant information gaps, in order to contribute to the development of policies and other initiatives that will effectively address gender inequalities in pensions.

<sup>124</sup> Law 4387/2016 introducing the *Unified System of Social Insurance, providing for the reform of the social protection system and pension scheme and regulating the tax income and taxation for chance-games and inserting other provisions*.

<sup>125</sup> [GNCHR Observations](#) on the National report submitted in accordance with par. 5 of the annex to HRC resolution 16/21 in view of the Third Cycle of Universal Periodic Review (UPR) of Greece during the UN Human

The GNCHR has repeatedly criticised the multiple interventions of the State on trade union freedom and free collective bargaining, such as the establishment of the State General Register of Employees' Trade Unions (GEMISOE) providing for sanctions in case of non-registration of trade unions, the suspension of certain trade union rights against men and women representatives of trade unions and the restriction of the regulatory scope and normative effect of the collective bargaining system (National General Collective Agreement (EGSSE) sectoral and similar profession agreements), thereby widening the wage gap and increasing discrimination against women in terms of working conditions and terms of employment.<sup>126</sup>

Particular mention is made of the following actions of the GNCHR with an emphasis on the protection of labour rights:

- The Second Vice-President of the GNCHR, Ellie Varchalama gave an interview to the journalist Marios Dionellis in the radio broadcast “Back pages” of the Press Project radio, about the Draft Bill of the Ministry of Labour and Social Security entitled “*Towards a stronger labour market - Transposition of Directive (EU) 2019/1152 of the European Parliament and of the Council dated 20 June 2019 - Simplifying digital procedures and strengthening the Labour Card - Upgrading the operations of the Ministry of Labour and Social Security and the Labour Inspectorate*”, on the occasion of the Observations submitted by the GNCHR, on 21 September 2023.
- The Second Vice-President of the GNCHR and legal advisor of GSEE, Ellie Varchalama participated in the conference on “*Equal Opportunities at Work*”, organised by the Ministry of Labour and Social Affairs in cooperation with the Greek Public Employment Service (DYPA), where she pointed out the need to remain vigilant, to record and evaluate data on progress and obstacles to preventing and combating unlawful discrimination, violence and harassment at work, on 14 July 2022.

Today, there are still gaps in existing legislation and its implementation in practice,<sup>127</sup> which limit women's enjoyment of their labour rights free from gender discrimination, e.g. the **high unemployment rate among women**,<sup>128</sup> **the dismissal of women during pregnancy and**

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Rights Council's 39th Session, 30 July 2021. pages 14, 23, 29, General Confederation of Greek Workers (GSEE) Observation CEACR 30 August 2019.

<sup>126</sup> GNCHR Observations on the Draft Bill of the Ministry of Labour and Social Affairs, entitled: “*On the Protection of Employment Establishment of the Independent Authority Labour Inspectorate Ratification of the ILO Convention No. 190 on violence and harassment in the world of work Ratification of the ILO Convention No. 187 on the Promotional Framework for Occupational Safety and Health at Work Incorporation of Directive (EU) 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance for parents and carers*” (14 June 2021, page 19, [Submission by the Greek National Commission for Human Rights \(GNCHR\)](#) to the UN Human Rights Council's Universal Periodic Review of Greece, September 2015

<sup>127</sup> [Submission by the Greek National Commission for Human Rights by the Greek National Commission for Human Rights \(GNCHR\)](#) to the UN Human Rights Council's Universal Periodic Review of Greece, September 2015.

<sup>128</sup> General Secretariat Observatory on Gender Equality [19th E-Bulletin - Female Unemployment](#), 1 April 2019.



women employed in the private sector in flagrant violation of the law, the absence of a minimum standard maternity allowance for all working mothers, the continuing decline in already inadequate day-care facilities for children and dependent persons.<sup>129</sup> With regard to the gender pay gap and the occupational gender segregation in the labour market, attention is drawn particularly to the observations of the ILO's monitoring bodies on our country, notably of the Committee of Experts on the Implementation of the **C100 - Equal Remuneration Convention, 1951 (No. 100)** and its Recommendations.<sup>130</sup> Indicatively, according to Eurostat, the gender pay gap in Greece in 2023 was 13.6%, while the EU average stood at 12%. In 2021 the gap in Greece was 10.4%, compared to the corresponding EU rate of 12.7%.<sup>131</sup> Given that the EU pay gap has barely changed in the last decade, this marks a significantly wider gap than the EU average.<sup>132</sup>

#### Gender pay gap, Eurostat

Years	Greece	EU
2023	13,6%	12%
2022	10,4%	12,7%
2021	10,4%	12,7%

As for 2024, the unemployment rate for women in Greece reached 12.8%, while for men it stabilized at 8%, a gap of 4.8 percentage, highlighting the gendered dimension of the issue.<sup>133</sup> Similarly, the EU average unemployment rate for men stands at 5.7%, while for women it is 6.2%.<sup>134</sup> Comparing these figures with those of 2021, when the unemployment rate for women in Greece was 18.9% and for men 11.4%, while the EU average stood at 7.4%

<sup>129</sup> See GNCHR submission of Information relevant to the implementation of the Convention on the Elimination of all forms of Discrimination against Women in response to the list of issues (CEDAW), 2 January 2024, [Observations by the GNCHR](#) on State's draft reply to the list of issues prior to the submission of the combined Eighth and Ninth Periodic Report under the Convention on the Elimination of Discrimination against Women (CEDAW), 9 April 2023, page 6, and [GNCHR submission of Information](#) relevant to the implementation of the Convention on the Elimination of all forms of Discrimination against Women – CEDAW 1, 21 October 2020.

<sup>130</sup> See [Equal Remuneration Convention, 1951 \(No. 100\)](#), Observation (CEACR) - adopted 2020, published 109th ILC session (2021) or Direct Request (CEACR) - adopted 2020, published 109th ILC session (2021) . See also [Report Form on the Equal Remuneration Convention 1951 \(100\) Report III \(Part B\) - General Survey - Achieving gender equality at work](#), 111th Session, 2023; [Observation \(CEACR\) - 2024](#), published 113rd ILC session (2025); See also GSEE General survey on discrimination for the ILO, 2022.

<sup>131</sup> Eurostat, [Στατιστικά στοιχεία για το μισθολογικό χάσμα μεταξύ των φύλων](#), 2022, 2023

<sup>132</sup> European Commission [The gender pay gap situation in the EU](#).

<sup>133</sup> Eurostat, [Στατιστικά στοιχεία για το δείκτη ανεργίας ανά χώρα και φύλο](#), 2024.

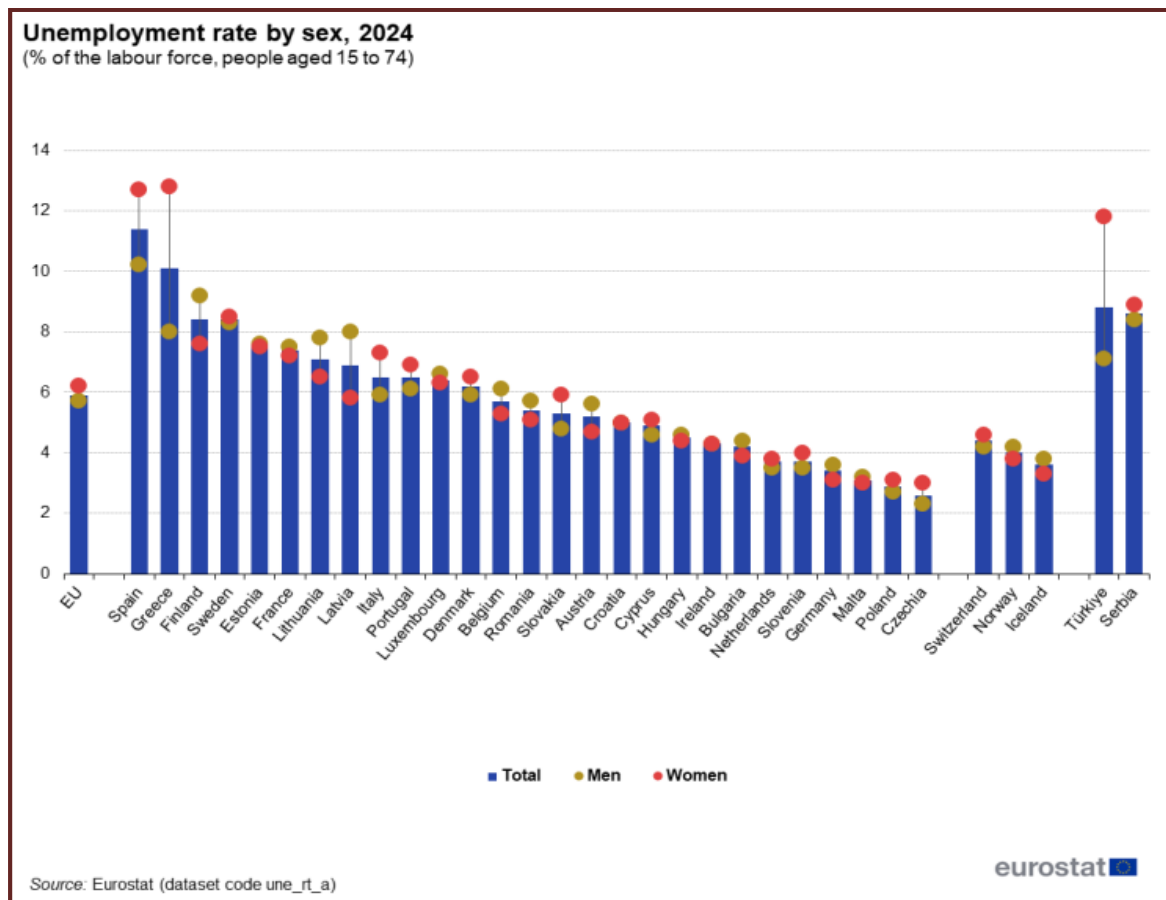
<sup>134</sup> Eurostat, [Στατιστικά στοιχεία για το δείκτη ανεργίας στην Ευρώπη ανά φύλο](#), 2024.

for women and 6.8% for men, a significant improvement can be observed, as the gap has narrowed.

### *Unemployment rate by sex and year, Eurostat*

Years	Greece		E.U.	
	Women	Men	Women	Men
2024	12,8%	8%	6,2%	5,7%
2023	13,1%	8%	6,3%	5,6%
2022	14,3%	8,8%	6,1%	5,5%
2021	14,7%	9,6%	6,2%	5,8%

### *Unemployment rate by sex, 2024*



However, all the recent Annual Reports of the Labour Institute of the General Confederation of Hellenic Workers (INE GSEE) on the Greek economy and employment reach similar conclusions.<sup>135</sup>

In particular with regard to the pandemic crisis, the figures in the 2020 INE GSEE Report show a decline in job opportunities for women, larger reduction in women's working hours compared to men's, reflecting the greater impact of the pandemic on women.<sup>136</sup> Based on data supplied, in the fourth quarter of 2020, the unemployment rate for women aged 15 to 19 exceeded 70%, while in the first quarter of the same year it was 35.6%. As for women aged 25 to 29, the unemployment rate rose from 25% in the fourth quarter of 2019, to 33% in the fourth quarter of 2020. The GNCHR agrees with the conclusions of the INE GSEE, according to which the pandemic crisis has reinforced gender inequalities, especially in young ages, in a labour market already characterised by high inequality and fragmentation.<sup>137</sup>

Greece's slow pace of progress towards gender equality shows that efforts to strengthen and promote women's rights in practice should be integrated and coordinated as part of the State's key priorities, with companies, businesses, and social organisations also working towards this goal.<sup>138</sup> The Ombudsman, in his 2022 Special Report on equal treatment as the National Equality Body, underlines that the discrimination cases reported to the Authority are out of step with the extent and intensity of discrimination in the real social field, especially with regard to cases of discrimination against vulnerable groups. As regards the legislative developments that have occurred under Law 4808/2021, the Ombudsman acknowledges in his Special Report that a successful framework is gradually being set up on issues such as violence and harassment at work, the introduction of flexible forms of work, e.g. teleworking and a more extensive protection against discrimination based on disability in the areas of education and provision of goods and services, despite the persistent serious shortcomings in the field of effective implementation and the achievement of tangible progress.<sup>139</sup>

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<sup>135</sup> [INE-GSEE Annual Report 2024, 2023, 2022, 2021, 2020](#).

<sup>136</sup> [Annual Report 2020](#), pages 70-74.

<sup>137</sup> INE GSEE, [10<sup>th</sup> Bulletin on Economic Developments](#), The impact of the pandemic crisis on the labour market in 2020, April 2021, page 8 See also: ILO, Application of International Labour Standards 2020, Report of the Committee of Experts on the Application of Conventions and Recommendations (CEACR), International Labour Conference 109th Session, 2020 [Report III \(Part A\)](#), page 394 See also the GNCHR [Report](#) on the need to protect human rights when taking measures in response to Pandemic COVID -19 and recommendations to the State - Meetings of 8, 22, 29 April and 6 May 2020, June 2020, page 6 and GNCHR [Reference Report](#) on the impact of the pandemic and the measures taken in its response on human rights and recommendations to the State, 19 May 2021, page 65

<sup>138</sup> ELIAMEP, [In Focus – Equality between women and men in Greece and in the EU](#), Chrysa Papalexatou, Manos Matsaganis, 11 November 2022.

<sup>139</sup> Ombudsman, [Special Report on Equal Treatment](#), 2022, pages 11-12.

Similar concerns were also expressed in the Special Report of the Greek Ombudsman in 2023.<sup>140</sup> As the independent authority emphasized, complaints of gender-based discrimination in the workplace accounted, once again in 2023, for half of all reported cases despite the admittedly improved legislative interventions at both the EU and national levels. At the same time, the Ombudsman highlighted the importance of adopting Directives 2023/970/EU and 2022/2381/EU,<sup>141</sup> expressing the belief that they will play a decisive role in strengthening the implementation of the principle of equal pay between men and women and in improving gender-balanced representation in senior management positions of listed companies.

In the light of the above on equal participation of women in work, the GNCHR addresses the following recommendations to the Greek State:

- 1. The GNCHR reiterates the need to assess the cumulative impact of the measures taken in the past during the financial, as well as during the pandemic crisis, on labour rights, with due regard for the gender dimension, drawing the State's attention to the risks associated with the full enjoyment of these rights and the precariousness experienced in practice in terms of working conditions and remuneration.***
- 2. The GNCHR proposes the immediate collection of data by gender, geographical location and group on the working conditions and terms of employment of women. At the same time, it encourages employers to collect and publish their data on the gender pay gap in order to better understand the reasons behind the gender pay and pension gap and to take appropriate corrective measures, in line with the CEDAW Concluding Observations.<sup>142</sup>***
- 3. The GNCHR recommends that education Actions in schools and awareness-raising campaigns for girls and women be carried out to provide information on gender-based occupational segregation in the labour market as the root cause of pay gaps in order to encourage women's professional participation.***
- 4. The GNCHR proposes to develop measures to enhance law enforcement mechanisms in cases of complaints related to gender discrimination, such as violation of the principle of equal remuneration, non-recruitment or dismissal due to pregnancy/childbirth, harassment, etc.***

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<sup>140</sup> Greek Ombudsman - [Equal Treatment - Special Report 2023](#)

<sup>141</sup> [DIRECTIVE \(EU\) 2023/970 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL](#) of 10 May 2023 to strengthen the application of the principle of equal pay for equal work or work of equal value between men and women through pay transparency and enforcement mechanisms and [DIRECTIVE \(EU\) 2022/2381 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL](#) of 23 November 2022 on improving the gender balance among directors of listed companies and related measures.

<sup>142</sup> CEDAW/C/GRC/CO/8-9: Concluding Observations on the combined fourth to sixth periodic report of Greece, 19 February 2024, paragraph 34(a)(iv).

- 5. The GNCHR calls on the competent authorities to carry out on going consultation Actions with all social partners and the contribution of the GNCHR itself with a view to bridging the gender gap in the labour market. In this context, it proposes working with the General Secretariat for Equality and Human Rights to organise a series of discussions, bringing together the new generation of women scientists who are increasingly conquering the fields of science, technology, engineering and mathematics (STEM), sciences, which are associated in the world's consciousness with the "male gender". Representatives of women's organisations, women in senior positions in companies, independent authorities, universities and research centres, as well as Greek women who have excelled abroad in positions of responsibility (e.g. international organisations), should be invited to participate in the discussions, serving as role models and sharing their experience.**
- 6. The GNCHR calls on the State to organise information actions aimed at eliminating the prejudice and stereotypes prevalent in Greek public opinion and the Greek media with respect to the role of women in the business and economic life of the country, especially in positions of power, as a main channel for changing attitudes.**
- 7. The GNCHR calls on the competent authorities to ensure that job advertisements posted or released on the Internet do not contain gender-biased language, such as the widespread phrase 'we are hiring girls'. UN WOMEN has compiled valuable guidance on how to create vacancy announcements with a view to engaging and attracting a more diverse group of candidates, in line with the principles of equality and diversity of the institution concerned.<sup>143</sup>**
- 8. The GNCHR calls on the State to establish the maternity allowance in accordance with Law 4659/2020 for both transgender and non-binary persons, since the law refers only to "mothers" without recognising the identity of transgender persons.**
- 9. The GNCHR calls on the State authorities to respond to the CEDAW request for data on the number of migrant women employed as domestic workers, along with information on the measures taken to ensure that migrant women enjoy equal rights with domestic workers.**
- 10. The GNCHR, taking into account European Regulation 2024/1689 on Artificial Intelligence, which establishes harmonised rules for artificial intelligence, as well as the mandate it has undertaken under the Regulation and following its designation as one of the authorities referred to in Article 77 of the Regulation (Powers of fundamental rights supervisory authorities), calls upon the State to: i) assess the impact of Artificial Intelligence systems on gender-based discrimination, and ii) ensure, through clear safeguards and targeted measures, that in their implementation, Artificial Intelligence**

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<sup>143</sup> UNWOMEN, [Guidance on Creating Inclusive Vacancy Announcements: Good Practice Examples from the UN](#), May 2022.

***systems will neither perpetuate nor reinforce existing gender inequalities in the new labour market, as shaped by automation and digital transformation.***

### *i) Roma Women*

The GNCHR shares the *CEDAW* concern as regards the lack of up-to-date reliable data on Roma women's employment, social exclusion and the difficulties they face in enjoying basic rights, such as access to healthcare facilities, social benefits, education, active citizenship and participation in labour market.<sup>144</sup> **The disadvantaged position of Roma women** in their own communities magnifies the range of difficulties they face.

These concerns are not far from those expressed by the Council of Europe Commissioner for Human Rights Michael O' Flaherty, who visited the GNCHR offices, during his visit to Greece in February 2025,<sup>145</sup> where the GNCHR had the opportunity to highlight the lack of effective social inclusion policies towards Roma. In particular Roma women and girls despite having the potential to act as significant agents of change within their communities, bear the greatest burden of discrimination and social exclusion on a daily basis. As the Commissioner stressed in the Memorandum drawn up after his visit, the situation of Roma women and girls in the country remains unfavourable and therefore recommends that national, regional and especially local authorities accelerate the implementation of the National Strategy and Action Plan for the Social Inclusion of Roma 2021-2030, paying particular attention to the needs of the most vulnerable, including women.<sup>146</sup>

The disadvantaged position of Roma women within their communities amplifies the range of obstacles they face. Inequality and gender-based discrimination in the field of employment are also evident in the findings of research conducted by the European Fundamental Rights Agency (FRA) in 2022, which show that the employment rate of Roma women, compared to the general population, is only 15%.<sup>147</sup>

#### **Roma Survey 2021, Number of Interviews and Household Members**

<b>Interviews</b>	<b>Household Members</b>
649	2,063

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<sup>144</sup> Information relevant to the implementation of the Convention on the Elimination of all forms of Discrimination against Women – (CEDAW), 21 October 2020, pages. 7-8.

<sup>145</sup> Visit of the Council of Europe Commissioner for Human Rights Michael O' Flaherty to the Offices of the GNCHR, 5 February 2025.

<sup>146</sup> Memorandum on the human rights of Roma in Greece of Michael O'Flaherty, on the human rights of Roma in Greece, 3.6.2025.

<sup>147</sup> FRA, *Roma in ten European Countries- Main Results*, 2022, σελ. 44.



### Participation of Roma men and women in labour market in Greece and the EU, 2022

Population Group	Men (%)	Women (%)
Roma (Greece)	53%	15%
Roma (EU)	58%	28%

According to an earlier survey carried out by the FRA<sup>148</sup> in Greece in 2016, the gender gap in labour market participation remains large among the general population, but not as large as among the Greek Roma. This is because of the higher commitment of Greek Roma women to unpaid care responsibilities such as domestic work and children (in Greece 48% of Greek Roma women declare domestic work as their main activity) as a result of stereotypes and perceptions that keep Roma women in a more disadvantaged position.<sup>149</sup>

### Percentage of Roma who felt discriminated against in core areas of life because of being Roma in Greece and the EU, by Survey Year (%), FRA 2022

FRA Survey	GREECE	EU
2021	53%	25%
2016	48%	26%

As the National Commission points out in its *Observations on the 2023 State's Report*, the adverse employment conditions, which are largely attributed to prejudice and discrimination, as shown by the **unemployment rate among Roma of 64%**, and the **nearly zero work opportunities for Roma women, together form the basis for widespread gender inequalities at home as well**. All these critical factors, together with poor living conditions (52.6%), severe housing deprivation and poverty, impose a particular burden on Roma women and children, resulting in their marginalisation.

The GNCHR, in its Contribution to the preparation of the *National Strategy and Action Plan for the Social Inclusion of Roma 2021-2030*, in March 2021,<sup>150</sup> taking into account the fact that employment is an essential part of the pathway to integration process, as well as the multiple discrimination against Roma women, **it places particular emphasis on including measures in the National Strategy to eliminate such discrimination and to facilitate and ensure Roma women's access to employment and work**. The same proposals were

<sup>148</sup> FRA, EU-MIDIS II [Second European Union Minorities and Discrimination Survey: Roma-Selected Findings](#), 2016, pages 20-23.

<sup>149</sup> 2016- 2020 National Action Plan for Gender Equality (ESDIF)

<sup>150</sup> GNCHR Contribution to the elaboration of the National Strategy and Action Plan for the Social Inclusion of Roma 2021-2030, March 2021, pages 21, 22, 25.

put forward by the GNCHR within the *Working Group for Roma Social Protection and Inclusion* set up in May 2022, within the framework of the *National Strategy for Social Inclusion and Poverty Reduction (ESKE 2021-2027)* at the initiative of the *General Secretariat for Social Solidarity and Combating Poverty* of the *Ministry of Labour and Social Affairs* in the meetings of which it has consistently participated.<sup>151</sup>

Similarly, within the framework of its participation in the meetings of the *Advisory Committee on the Social Inclusion of Roma* regarding the *National Strategy and Action Plan for the Social Inclusion of Roma 2021–2030*, and in the context of its observations, interventions, and recommendations to the competent authorities, the National Commission consistently draws attention to the need for the effective implementation and intensification of the actions outlined in the *National Strategy and Action Plan for the Social Inclusion of Roma 2021–2030*. This should be carried out by all relevant stakeholders, with the aim of urgently addressing the socio-economic exclusion faced by this population group, with particular emphasis on the protection of the rights of Roma women.

In order to eliminate multiple discrimination against the right to equal participation of Roma women in work, the GNCHR addresses the following recommendations to the Greek State:

**1. The GNCHR calls on the competent bodies to promote, within the framework of the “National Strategy and Action Plan for the Social Inclusion of Roma 2021 – 2030”, the horizontal and sectoral objectives of the “EU Roma Strategic Framework for Equality, Inclusion and Participation 2020 - 2030”, with emphasis, inter alia, on enhanced equal access of Roma women to qualitative and sustainable employment and reducing the gender gap in employment by at least half (objective 5). A condition of being able to move in the direction desired is the harmonisation between work and private/family life, as defined in Directive 2019/1158/EU on work-life balance for parents and carers and repealing Council Directive 2010/18/EU with particular attention to the activation of Roma women.**

**2. The GNCHR reiterates the need for systematic actions to empower Roma women and girls at local level mainly, with the aim of informing and raising awareness about: (i) the consequences of multiple discrimination against them (ii) the imperative to redistribute social roles within the family as well as obligations and responsibilities within the family (iii) the deprivation of education and work opportunities due to traditional stereotypes that promote early marriage and (iv) supporting their active participation in labour market while guaranteeing their access to free childcare services.**

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<sup>151</sup> Within the framework of the National Strategy for Social Inclusion and Poverty Reduction and with the aim of strengthening cooperation and networking between the public and private sectors and the continuous consultation among the institutions representing vulnerable and specific population groups, five (5) thematic working groups per target group (“Persons with Disabilities”, “Roma”, “Child and Family”, “Elderly People”, “Homeless”) were established in May 2022, to support the work of the Directorate of Social Inclusion and Social Cohesion.

**3. The GNCHR calls on the State to comply with GREVIO recommendations<sup>152</sup> and take measures to enhance access of women belonging to disadvantaged groups, including Roma women, to official employment, to extend social protection systems to Roma women employed in the informal economy and improve their access to employment and training opportunities.**

**(ii) Women with disabilities<sup>153</sup>**

It is often repeated by the GNCHR that the existing system of protecting persons with disabilities is not sufficiently coherent and consistent in terms of the measures implemented and services provided, and that it appears to lack data coordination.<sup>154</sup>

According to the 2020 Household Income and Living Conditions Survey data, processed by the Observatory on Disability Issues of the National Confederation of Disabled People, the percentage of women with severe disabilities aged 20-64 years was reported to be 19.3%, while the corresponding percentage for men with disabilities aged 20-64 years was 29.0%, and the percentage of women without disabilities was 50.5%.<sup>155</sup>

***Employment rate of persons with disabilities by gender***

	Employment index (%)
Women aged 20-64 years with severe disability	19.3
Men aged 20-64 years with severe disability	29.0

<sup>152</sup>Concluding observations of the UN CEDAW on the combined fourth to sixth Periodic Report of Greece [CEDAW/C/GRC/CO/8-9](#), 20February 2024, paragraph 34, (b), (d).

<sup>153</sup> ESAMEA, (National Confederation of People with Disabilities) [Alternative Report](#) Greece 2019 (final version) and responses to the List of Issues and Recommendations, for the 22nd Session, (26 August - 20 September).

<sup>154</sup> ESAMEA, [Alternative Report](#) – Greece 2019 (final version) and responses to the List of Issues and Recommendations, for the 22nd Session, (26 August - 20 September), [Shadow Report submitted by the Greek National Commission for Human Rights to the UN Committee on the Rights of Persons with Disabilities in relation to the implementation of the Convention on the Rights of Persons with Disabilities and its Optional Protocol by the Hellenic Republic \(CRPD\)](#) , 5 July 2019, pages 11-12, [Contribution by the Greek National Commission for Human Rights \(GNCHR\) to the Committee on the Rights of Persons with Disabilities \(CRPD\) of the United Nations in the framework of the CRPD 21st session and 11th pre-session \(11 March – 11 April, Geneva\) in relation to the implementation of the Convention on the Rights of Persons with Disabilities in the State party](#), 1 March 2019, pages 37-39.

<sup>155</sup> Disability Issues Observatory of the National Confederation of People with Disabilities. (2022). “Women with disabilities”. Letter to the Ministry of Labour and Social Affairs within the framework of Work Package 9 of the Disability Issues Observatory of the National Confederation of People with Disabilities, on: " Providing support to the individual focal points (Ministries and Regions) on the proper application of the requirements set out in the Convention and the Committee's Concluding Observations at Central and Regional level"; See also [Note of the Observatory of the General Secretariat for Equality and Human Rights](#), January 2024.

Women aged 20-64 years without disability	50.5
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**Inadequate free care services for women with disabilities restrict their participation in public and professional life.** Law 4440/2016, and in particular Article 25, facilitates the recruitment process for people with disabilities in both public and wider public sector jobs. However, the actions undertaken by the Greek State focus on covering specific policy areas and therefore **lack horizontal inclusion and integration of the disability in the mainstreaming in the planning of social policies.**<sup>156</sup> Another point of concern for the GNCHR is the absence of provisions on the minimum wage from national collective bargaining agreements, with particular implications for people with disabilities.

The GNCHR recognises the actions implemented by the former General Secretariat for Family Policy and Gender Equality (GGDOPIF) to support women,<sup>157</sup> as well as the programmes designed by the Ministry of Labour and Social Solidarity as early as 2017<sup>158</sup> to support people with disabilities, regardless of gender. Unfortunately, the cumulative effects of the past financial measures and benefit cuts<sup>159</sup> have been aggravated during the Covid-19 pandemic.<sup>160</sup>

The GNCHR welcomes with great satisfaction, as a body involved in the drafting process, by submitting comments and recommendations, the first *2020-2023 National Action Plan on the Rights of Persons with Disabilities*, which includes comprehensive policies and measures for the protection of women with disabilities, women with chronic diseases, elderly women, etc. in accordance with the UN guidelines.

Finally, the NCHR welcomed the National Strategy for the Rights of Persons with Disabilities 2024–2030, “*A Greece with all, for all*”, which places particular emphasis on ensuring equal opportunities for women with disabilities, who experience multiple forms of discrimination. Despite the protective measures envisaged, the figures remain worrying: the employment rate of women with disabilities in Greece stands at only 28%, compared to almost 40% of men with disabilities, and well below the European averages (48% and 54% respectively). At the same time, the unemployment rate for women with disabilities exceeds 31%, while in the EU it stands at 18%.

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<sup>156</sup>ESAmA, (National Confederation of People with Disabilities) [Alternative Report](#) Greece 2019 (final version) and responses to the List of Issues and Recommendations, for the 22nd Session, (26 August - 20 September).

<sup>157</sup> <http://www.isotita.gr/>

<sup>158</sup> Ministry of Labour, Social Security and Social Solidarity, [2017 Annual Report to the GNCHR](#).

<sup>159</sup> [GNCHR Observations on the Protection of the rights of older persons](#), 20 November 2014, GNCHR [Factsheet](#) on the Impact of Financial Reform Policies and Austerity Measures on Human Rights, 2019.

<sup>160</sup> GNCHR [Report](#) on the need to protect human rights when taking measures in response to the COVID -19 pandemic and recommendations to the State. Meetings of 8, 22, 29 April and 6 May 2020, June 2020, page 6 GNCHR, [Reference Report](#) on the impact of the pandemic and the measures taken in its response on human rights and recommendations to the State, 19 May 2021, page 60 et seq.

**Employment rate of women with disabilities in Greece and Europe**

Population Group	Men (%)	Women (%)
Persons with disabilities (Greece)	40%	28%
Persons with disabilities (EU)	54%	48%

This situation highlights the need for targeted policies to support labour market inclusion, with a focus on combating gender-based discrimination, strengthening skills, and protecting against violence and abuse. Furthermore, it must be effectively ensured in practice that digital transformation and automation will serve as an opportunity rather than as an additional barrier for women with disabilities.

In the light of the foregoing, the GNCHR, addresses the following Recommendations to the Greek State:

- 1. The GNCHR calls on the State to plan and implement targeted employment and training programmes for people with disabilities/chronic diseases and especially for women with disabilities.***
- 2. The GNCHR recommends the implementation of actions that promote the inclusion of women with disabilities in the labour market, in accordance with the provisions of both the National Strategy on the Rights of Persons with Disabilities 2024-2030 and the 2021-2025 Greek National Gender Equality Action Plan.***
- 3. The GNCHR calls on the State to comply with the recommendations of GREVIO <sup>161</sup> to enhance access of women belonging to disadvantaged groups, including women with disabilities, to formal employment, to extend social protection systems to women with disabilities working in the informal economy and to foster their access to employment and training opportunities.***

**D.1 Women in positions of responsibility in the public and private sectors**

The Greek National Commission for Human Rights (GNCHR) has expressed its satisfaction with the adoption of an increasing number of legislative initiatives aimed at strengthening the representation of women in positions of responsibility in the labour market. The most recent development in this regard is the increase in the representation quota of the underrepresented gender from 25%, as set by Law 4706/2020,<sup>162</sup> to at least 33% for the

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<sup>161</sup> Concluding observations of the UN CEDAW on the combined fourth to sixth Periodic Report of Greece [CEDAW/C/GRC/CO/8-9](#), 20February 2024, paragraph 34, (b), (d).

<sup>162</sup> Law 4706/2020 on the corporate governance of public limited companies, the modern capital market, the incorporation into Greek legislation of Directive (EU) 2017/828 of the European Parliament and of the Council,

boards of directors of companies listed on the stock exchange, with the adoption of Law 5178/2025. Law 5178/2025 transposes into national law the provisions of Directive (EU) 2022/2381 of the European Parliament and of the Council of 23 November 2022 on improving the gender balance among directors of listed companies, along with related measures concerning non-listed public limited companies and public undertakings. It also introduces provisions for strengthening pilot programmes aimed at enhancing social cohesion. The new legal framework seeks to increase women's participation in decision-making bodies and to reduce the gender gap, marking a significant step forward towards balanced gender representation.

In particular, the GNCHR welcomed this legislative initiative by the Ministry of Social Cohesion and Family and also expressed its appreciation for the observance of the principles of good law-making. The Ministry invited the GNCHR to contribute its expertise and experience—within the framework of its mandate—at all stages of the preparatory process for the transposition of Directive (EU) 2022/2381 into national law. It is worth noting that, on 11 November 2024, the GNCHR, acting as a bridge between the State and civil society, organised a hearing of individuals and organisations on the transposition of the Directive, pursuant to its competence under Article 18(4) of Law 4780/2021. The GNCHR subsequently included all conclusions and recommendations arising from the hearing into its reasoned opinion. During its intervention in the meeting of the *Standing Committee on Social Affairs of the Hellenic Parliament*, held on Friday, 7 February 2025, which focused on examining the draft law,<sup>163</sup> the GNCHR underlined the importance of Article 12 (Balanced gender representation in the boards of directors of non-listed public limited companies – Addition of paragraph 6 to Article 87 of Law 4548/2018). This provision, which allows for the optional extension of the 33% gender quota to non-listed companies, is expected to contribute in the long run to a more balanced representation of women and men in leadership positions. The GNCHR also emphasised the need for the introduction of a specific quota to ensure the consistent representation of women with disabilities in such bodies, in order to promote diversity and inclusion—a long-standing request of the National Confederation of Disabled People (ESAMEA). Finally, the GNCHR stressed that all the measures being promoted must be implemented consistently and effectively, so that Greece may gradually converge with the European average of 40%.

The GNCHR has welcomed the adoption of the growing number of legislative initiatives aimed at **increasing the proportion of women in positions of responsibility** in the world of work.<sup>164</sup> These initiatives include measures to reverse the discriminatory tendency

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measures for the implementation of Regulation (EU) 2017/1131 and other provisions introduced a 25% quota for the representation of women on the boards of directors of companies listed on the Athens Stock Exchange.

<sup>163</sup> H GNCHR at the Social Affairs Committee of the Parliament on the NS of the Ministry of Social Cohesion and Family, November 11, 2024.

<sup>164</sup> Law 4706/2020 on Corporate Governance of Limited Liability companies, the modern capital market, the transposition into Greek law of Directive (EU) 2017/828 of the European Parliament and of the Council, Measures for the implementation of Regulation (EU) 2017/1131, and other provisions, introduced a quota of 25% for the



against women, the so-called "Glass Ceiling" phenomenon, which refers to the institutional - social barriers that limit women's professional advancement to high administrative positions/ particular emphasis is placed on strengthening the representation of women in positions of responsibility in the labour market, with the aim of addressing the systemic bias against women and tackling the "glass ceiling" phenomenon—namely, the institutional and social barriers that hinder women's advancement to high-level managerial positions. The guiding principle must be an **open and "vibrant" working environment with equal opportunities for all**. As the National Commission highlighted already above, what is remarkable, is that despite the legislator's intention to establish a coherent framework for effective gender equality, in practice today we note the absence of good and effective practices and implementing measures on the one hand and of appropriate measures to assess the implementation of the current framework, on the other.<sup>165</sup> The *Working Group on the issue of discrimination against women in law and in practice* has also emphasized this point in its report, already in 2019, through references to **serious challenges in the implementation of laws due to old attitudes and past practices, lack of available data and possibility for proper monitoring of the implementing measures and, ultimately, the non-implementation or faulty implementation of the framework**.<sup>166</sup> The GNCHR regrets to note that five (5) consecutive years later, the above mentioned findings of the UN Working Group remain unchanged, reiterating once again that the main challenge that hinders progress is, *inter alia*, the **lack of available up-to-date, specific and reliable data**, which certainly makes it impossible to fully capture the real situation of the country.

The GNCHR in its Observations on the 2021-2025 ESDIF, in September 2021, acknowledged with satisfaction that this plan includes important initiatives to increase the participation of women in positions of power, responsibility and leadership (objective 3.2: Increase in the number of women in positions of responsibility in the public and private sectors and Action 3.2.3: Monitoring of the participation of women in positions of responsibility, including the monitoring of the quota of women's participation in the Boards of Directors of companies listed in the Athens Stock Exchange (ASE) (25%), while at the same time it reiterated once again the need for effective implementation of the existing legislation. It should be noted

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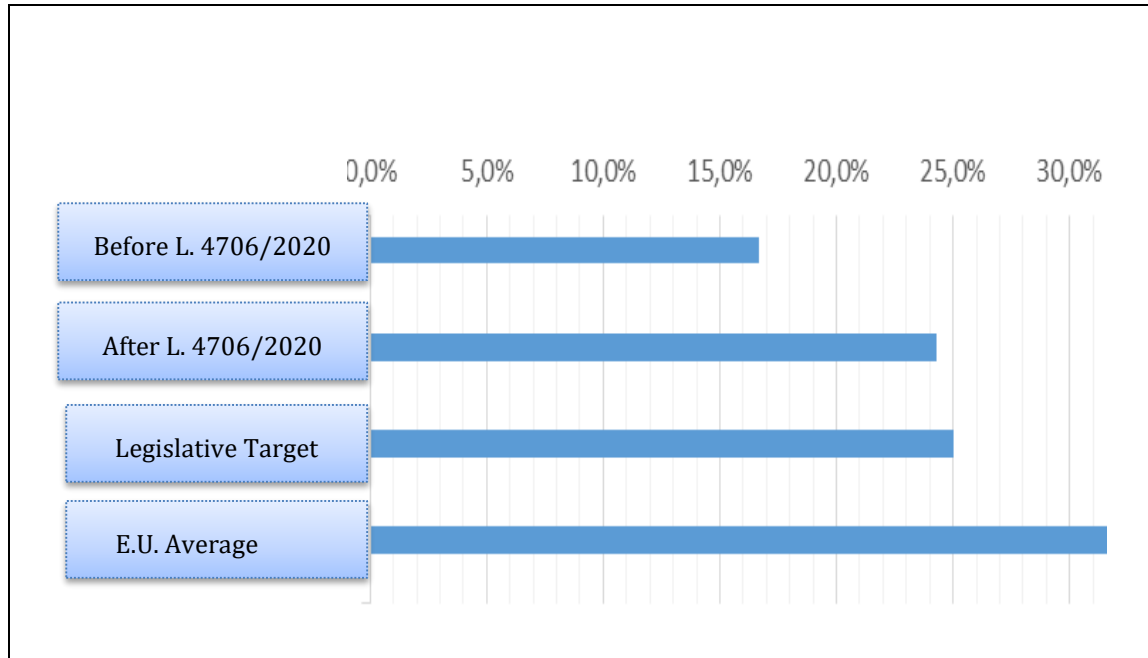
*representation of women on the boards of directors of companies listed on the Athens Stock Exchange. Law 4276/2020 on the reform of the institutional framework of candidatures in sports entities, distinguished escorts for athletes with disabilities, establishment of the National Platform for Sporting Integrity, the Hellenic Olympic Committee (EOC), the Hellenic Paralympic Committee (EPA) and other provisions* also introduces a quota for the balanced participation of men and women in the administrations of sports clubs. Law 4604/2019 increased the existing gender quota for parliamentary elections from at least 33% to at least 40% of the total number of candidates. Law 4555/2018 on the reform of the institutional framework of local Government increased the gender quota for the total number of candidates in regional, municipal and community councillors from 33% to 40%.

<sup>165</sup> See European Commission, European Network of legal experts in Gender Equality and Non-discrimination, Panagiota Petroglou, *Country report gender equality: Greece 2020 and Greece-country-report-gender-equality-2023*, page 39 et seq. See also herein page 22.

<sup>166</sup> *Report of the Working Group on the issue of discrimination against women in law and in practice*, following its official visit to Greece from 1 to 12 April 2019, [A/HRC/44/51/Add.1](#), 30 June 2020, paragraphs 35-37.

that the disability mainstreaming has not been taken into account in this action of the 2021-2025 ESDIF. As the Commission pointed out, after monitoring the statistical data of the Observatory of the former General Secretary of Family Policy and Gender Equality (GSOPF), the empowerment of women in Greece in public and private sectors is disappointing, with the lowest scores noticed in the participation of women in leadership positions.<sup>167</sup> The most **serious inequalities are identified primarily in the private sector**. Only 9% of board members of the largest listed companies are women, despite legislation in place and the fact that investing in women's economic empowerment could yield higher economic results in achieving sustainable development goals such as gender equality. For example, despite the adoption of *Law 4706/2020 on Corporate Governance of Limited Liability companies... and other provisions*, which provides for at least 25% female representation on the boards of directors of listed companies and which according to studies,<sup>168</sup> has already contributed to improving the diversity of board composition of listed companies, unfortunately in 2022, boards of listed companies were represented by 926 men and 298 women, a representation corresponding to 75.7% and 24.3% of the total number of members, i.e. a female-to-male ratio of 1:3.<sup>169</sup> Certainly, this percentage, compared to the previous 16.7%, indicates a slight improvement in convergence with the European average of 34%, according to the EWOB (European Women on Boards) [Gender Diversity Index 2020](#).

#### *Representation of women in the boards of listed companies*



<sup>167</sup> Observations of the GNCHR on the 2021-2025 National Action Plan for Gender Equality of the Hellenic Ministry of Labour and Social Affairs, 27 September 2021, page 35.

<sup>168</sup> The RSM Board diversity Survey – The landscape as shaped after the implementation of Law 4706/2020, RSM Greece, March 2022.

<sup>169</sup> The RSM Board diversity Survey – The landscape as shaped after the implementation of Law 4706/2020, RSM Greece, March 2022.

In its *Observations on the 2023 State's Report*, the GNCHR draws the attention of the competent State authorities to the effective alignment with Directive [2022/2381/EU](#) on improving the gender balance among directors of listed companies and related measures, the so-called *Women on Boards Directive* which aims to introduce transparent recruitment procedures in companies so that at least 40% of non-executive director positions are occupied by the under-represented gender by 2026.

Of primary importance for increasing the participation of women in decision-making centres and eliminating the existing inequalities, is the adoption and implementation of measures to strengthen the equal participation of women in the Boards of Directors of companies.<sup>170</sup> The mandatory representation of women in the Boards of Directors of listed companies by at least 25% should be applied consistently, while at the same time immediate measures need to be taken towards narrowing the gap between men and women in the positions of Chairperson, Vice-Chairperson or CEO, in line with the positions of the Athens Chamber of Commerce and Industry (EBEA) and the National Chamber Network of Women Entrepreneurs (EEDGE).

In view of the above, and given the overriding need for equal employment opportunities between women and men, the GNCHR addresses the following Recommendations to the State:

- 1. The GNCHR reiterates the need for implementing education and training initiatives for girls and women to take on leadership roles as well as additional supporting measures to monitor the effective implementation of the legislation.***
- 2. Recognizing entrepreneurship as one of the driving forces of modern society, the GNCHR calls on the State to facilitate women who are entering the business world for the first time, to support female entrepreneurship, and to highlight the contribution of women to economic development and their advancement to leadership positions in businesses. Additionally, targeted actions should be undertaken to include gender equality into the corporate responsibility agenda of companies and to promote a culture of respect for full and substantive equality between men and women.***
- 3. The GNCHR stresses the need to implement mandatory measures to enhance the equal participation of women on the boards of listed companies, as well as measures to ensure their representation in the highest positions in the hierarchy, such as the positions of Chairperson, Vice-Chairperson or CEO.***

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<sup>170</sup> See [EBEA Press Release, Aiming for equal participation of women in the Boards of Directors of companies](#), 12.12.2023. The President of the Athens Chamber of Commerce and Industry (EBEA) and the National Chamber Network of Women Entrepreneurs (EEDGE), Sofia Kounenaki Efraimoglou, stresses that one of the most important principles of modern corporate governance is the balanced representation of women in the Boards of Directors and that the aim of the EBEA is to provide practical guidance to companies to promote gender diversity on their boards.



## D.2 Teleworking

As regards teleworking, taking into account particularly the urgent need that emerged during the Covid-19 pandemic, the GNCHR notes in its *Observations on the Bill of Law 4808/2021*,<sup>171</sup> on teleworking, in June 2021, that the relevant legalisation is *prima facie* moving in the right direction, since it helps decisively to ensure the maintenance of certain jobs and the viability of companies during the Coronavirus crisis. On the other hand, **teleworking has made the boundaries between the private and the working sectors blurring**,<sup>172</sup> causing many people to work outside their normal working hours, **a fact that disrupted their work-life balance**.<sup>173</sup> Therefore, while implementing teleworking has in practice revealed the need for the State to promote an updated protective legislative framework, this particular Bill fails to address important issues, such as the determination of the place and time of teleworking, the safeguarding of confidentiality and privacy, the way in which the Labour Inspectorate carries out the control of teleworking, etc. **Serious abuses of basic working conditions due to the required level of teleworkers' availability**, concerning working hours, pay, health and safety, produce the effect, in addition to the spatial restriction, of reduced leisure time and its constant and total surveillance, conditions

<sup>171</sup>GNCHR [Observations on the Draft Bill of the Ministry of Labour](#) and Social Affairs, entitled: "On the Protection of Employment Establishment of the Independent Authority Labour Inspectorate Ratification of the ILO Convention No. 190 on violence and harassment in the world of work Ratification of the ILO Convention No. 187 on the Promotional Framework for Occupational Safety and Health at Work Incorporation of Directive (EU) 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance for parents and carers" (14 June 2021, pages 60- 63, 73-76.

<sup>172</sup> See European Trade Union Confederation, [Working Time, Gender Equality, and Reconciling Work and Family Life](#).

<sup>173</sup> See European Trade Union Confederation (ETUC) [International Trade Union Confederation \(ITUC\) position on a resolution on the right to disconnect](#), 22-23.3.2021.

which when combined, lead to psychosomatic burnout. As regards the **employee's right to disconnect from his work within the framework of his/her legal working hours**,<sup>174</sup> the GNCHR calls on the State to safeguard the right to disconnect, which aside from being enshrined in international law<sup>175</sup> and having been established in case law,<sup>176</sup> it has also been approved as a legislative initiative by the European Parliament in its Resolution, urging the European Commission to submit a specific legislative proposal, that would allow those who work remotely to disconnect after the end of their working hours.<sup>177</sup> The right to disconnect at EU level could be inferred from the provisions of Directive 2003/88/EC (*Working Time Directive*).<sup>178</sup> The fact is that digital tools have increased efficiency and flexibility for employers and workers, but have also led to a "constantly on-call" or "ever-connected" mentality, with employees accessible at any time, including hours out of work. And of course, **to the question of whether teleworking is a curse or a blessing for gender equality and work-life balance**,<sup>179</sup> evidence to date shows that gender inequalities have not decreased, i.e. the need to achieve a more equitable distribution between work and unpaid care between women and men still remains.

In the light of the above on equal participation of women in work, the GNCHR addresses the following recommendations to the Greek State:

**1. The GNCHR, building on the principle that in teleworking the employer is obliged to provide the necessary equipment (including any software) to employees, enabling them to access the employer's network, systems and databases at the same level as they would have had if they were at the workplace, calls on the competent authorities to ensure that employees who invoke their right to disconnect are protected from any retaliatory or other negative consequences and that mechanisms are in place to deal with complaints or violations of the right to disconnect, in line with the positions of the European Parliament and the criticism of the European Trade Union Confederation of Trade Unions (ETUC).**<sup>180</sup>

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<sup>174</sup> See European Parliament Research Service (EPRS), [Briefing on the 'Right to disconnect'](#), July 2020.

<sup>175</sup> See International Labour Conventions (ILOs) No. 1/1919 and 30/1930, Recommendation 163/1981, CEF 156/1981 and its accompanying Recommendation 165 and finally, in the 2019 ILO Centennial Declaration on the future of work.

<sup>176</sup> See in particular, DEK, C-397/01 to C-403/01, Pfeiffer e.t.c., ECLI:EU:C:2004:584, 5-10-2004, ΔΕΕ, C-518/15, *Ville de Nivelles v. Rudy Matzak*, ECLI:EU:C:2018:82, 21-2-2018, C-55/18, *Federación de Servicios de Comisiones Obreras (CCOO) v. Deutsche Bank SAE*, ECLI:EU:C:2019:402, 14-5-2019.

<sup>177</sup> See [European Parliament Resolution](#) of 21 January 2021 making recommendations to the Commission on the right to disconnect (2019/2181(INL)).

<sup>178</sup> See European Parliament Research Service (EPRS), [Briefing on the 'Right to disconnect'](#), July 2020.

<sup>179</sup> Intereconomics, Review of European Economic Policy, Volume 56, number 5, "[teleworking: Curse or blessing for gender equality and work-life balance?](#)", Manuela Tomei, 2021, see also OECD [Teleworking through the gender looking glass Facts and gaps](#), Chloe Touzet, 13 February 2023.

<sup>180</sup> See European Parliament Research Service (EPRS), [Right to disconnect](#), July 2020 and European Trade Union Confederation (ETUC) [Position on the right to disconnect](#), 22-23 March 2021.



**2. The GNCHR calls on the State to plan and promote systematic awareness-raising and knowledge dissemination actions on employees' rights regarding teleworking and gender equality issues. Similar measures should be taken for the benefit of the younger generation at all levels of education through specific, consistent and coherent educational programmes, always with the aim of combating gender inequalities.**

### **D.3 Reconciliation of work and family life**

In its *Observations on the Bill of Law 4808/2021*,<sup>181</sup> in June 2021, the GNCHR expressed its views on the transposition of Directive 2019/1158/EU on work-life balance into the national legal order, acknowledging that the balance between work and family responsibilities is a key factor for the elimination of the gender bias in the assignment of "roles" and the fight against under-representation of women in the labour market. As it stressed, **the implementation of work-life balance measures should primarily promote equal participation of women in the labour market, equal sharing of caring responsibilities between men and women and the reduction of the gender pay gap.** Similar points were made two months later in September 2021 with regard to Objective 3.2: *Reconciliation of work and family life* in the *Observations on the ESDIF 2021-2025*. In Law 4808/2021, however, the benefits provided to the working parents that facilitate the reconciliation of work with family and private life, remain limited in substance, and are mainly relating to authorisations for leave of absence.<sup>182</sup> The aforementioned, combined with data showing that Greece is one of the EU Member States where **policies on long-term childcare leave were not as high on the political agenda** as childcare leave until the financial crisis, further heightens the concern.<sup>183</sup> The GNCHR also did take the opportunity in its *Observations* to reiterate its disappointment that Greece is one of the Member States that do not grant parental leave to parents who are same-sex couples.<sup>184</sup>

As regards the detailed arrangements for work-family life, the GNCHR taking into account, on the one hand, the impact of the recent financial crisis on the relationship between work and private and family life and on the other hand, the trend observed by mothers in Greece

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<sup>181</sup> GNCHR *Observations on the Draft Bill of the Ministry of Labour and Social Affairs*, entitled: "On the Protection of Employment Establishment of the Independent Authority Labour Inspectorate Ratification of the ILO Convention No. 190 on violence and harassment in the world of work Ratification of the ILO Convention No. 187 on the Promotional Framework for Occupational Safety and Health at Work Incorporation of Directive (EU) 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance for parents and carers", 14 June 2021, page 37.

<sup>182</sup> See also on the European Union website: [Greece - Maternity/paternity benefits](#).

<sup>183</sup> EIGE, Reconciliation of work, family and private life in the European Union: [Policy review](#), 2015, page 30.

<sup>184</sup> GNCHR *Observations on the Draft Bill of the Ministry of Labour and Social Affairs*, entitled: "On the Protection of Employment Establishment of the Independent Authority Labour Inspectorate Ratification of the ILO Convention No. 190 on violence and harassment in the world of work Ratification of the ILO Convention No. 187 on the Promotional Framework for Occupational Safety and Health at Work Incorporation of Directive (EU) 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance for parents and carers", 14 June 2021, pages 9 and 47.



to resolve any such dispute with their employers in private, accepting after all the violation of their rights for fear of losing their jobs,<sup>185</sup> expressed its concerns about the effective implementation of Law 4808/2021, which transposed Directive 2019/1158/EU on *work-life balance*, and the achievement of substantive equality between men and women. In this regard, the GNCHR once again reiterates its concerns regarding the application of flexible working arrangements for working parents, as is often the case with working mothers. The National Commission considers it important to **inform and raise awareness of employers** to promote policies facilitating employees, but also encourages the State to adopt measures to **inform employees themselves**, as well as **measures to provide affordable childcare and long-term care services**.

Moreover, the GNCHR submitted a detailed intervention to the UN Human Rights Council in July 2021, with *its Observations* on the National Report in view of the 3rd Periodic Review (UPR) of the country, and in January 2023, to the European Committee of Social Rights of the Council of Europe, with its *Observations on the 5th Greek Report on the implementation of the Revised European Social Charter*, reiterating all the above mentioned positions and Recommendations.

With a view to the **redistribution of social roles within the family and of family duties and responsibilities** between the two genders, i.e. the redistribution of unpaid work (domestic work), which until now has been considered a "natural obligation" of women, as well as the redistribution of (family or free) time in favour of women within the family, the GNCHR hopes that the implementing measures of Law 4808/2021, which transposed Directive 2019/1158/EU, will contribute, among other things, to increasing women's participation in the labour market, this being one of the main objectives of the Act.

In the light of the above the GNCHR addresses the following recommendations to the Greek State:

- 1. The GNCHR calls on the competent authorities to undertake a 'gender-based analysis' of the effects of non-balancing between work-family life, taking into account the impact of the preceding financial crisis and the multiple impact of the Covid-19 pandemic on work-family life balance.**
- 2. The GNCHR calls on the competent authorities to adopt and promote measures to facilitate access of working women to free childcare and long-term care services for**

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<sup>185</sup> See [Greek Ombudsman 2022 Special Report](#) on equal treatment. According to the relevant findings, employees who address the Ombudsman often hesitate to take further action. Between 2011 and 2022, the Ombudsman received 270 reports of harassment at work. 253 of these were investigated, while 17 were archived without being examined on procedural grounds. In a total of 25322 reports, 100 cases have been fully investigated, out of which were related to the public sector and 71 to the private sector, while in 4 cases the final finding is pending. Out of the 100 cases, 21 (9 related to the public sector and 12 to the private sector) the alleged conduct was not proven and/or the complainant refuted the alleged victim's allegations by presenting sufficient evidence; Greek Ombudsman [Special Report on Equality 2023](#), page 20 ff.

*young children or frail elderly parents or people with age-related disabilities. Access to such services should be provided without discrimination to parents who are same-sex couples.*

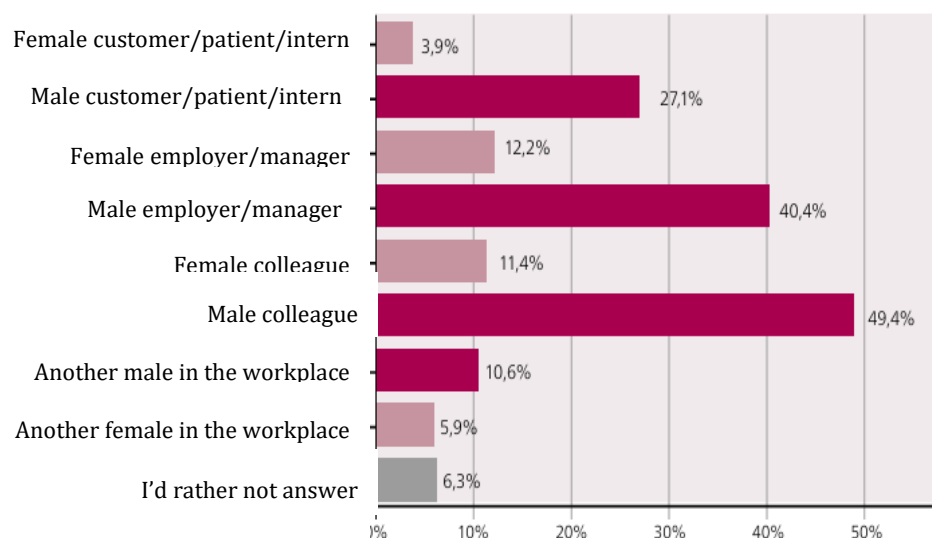
*3. The GNCHR proposes carrying out systematic information Actions and providing information material to all employers and employees in the public and private sectors on implementing measures of Law 4808/2021, which transposed Directive 2019/1158/EU on work-life balance.*

*4. The GNCHR proposes that informal care measures be explicitly included in public expenditure and that appropriate and measurable tools be developed to carry out audits to verify the effective implementation of the legislative framework in place, with guarantees of transparency and objectivity.*

*5. The GNCHR calls on the State to comply with the GREVIO Recommendations to recognise, reduce and redistribute the burden of unpaid care work to women by providing affordable childcare facilities and care services for the elderly and by promoting the equal sharing of domestic and family responsibilities between women and men.<sup>186</sup>*

## D.4 Sexual harassment in the workplace

### Reported harassers <sup>187</sup>



<sup>186</sup> Concluding observations of the UN CEDAW on the combined fourth to sixth Periodic Report of Greece CEDAW/C/GRC/CO/8-9, 20 February 2024, paragraph 34(c).

<sup>187</sup> INE GSEE-FRIEDRICH-EBERT-STIFTUNG, [EUROPEAN SURVEY ON SEXUAL HARASSMENT AT WORK - REPORT FOR GREECE](#), Editor: Athena Malagardi, Statistical analysis: Konstantinos Boukouvalas, Statistical analyst INE GSEE 2024, pages 18-19.

### *Reported Harassers*

Category	Percentage
Female client or patient or intern or student or passenger	3,9%
Another woman at work	5,9%
I prefer not to answer	6,3%
Another man at work	10,6%
Female colleague or partner	11,4%
Female boss or supervisor	12,2%
Male client or patient or intern or student or passenger	27,1%
Male boss or supervisor	40,4%
Female colleague or partner	49,4%

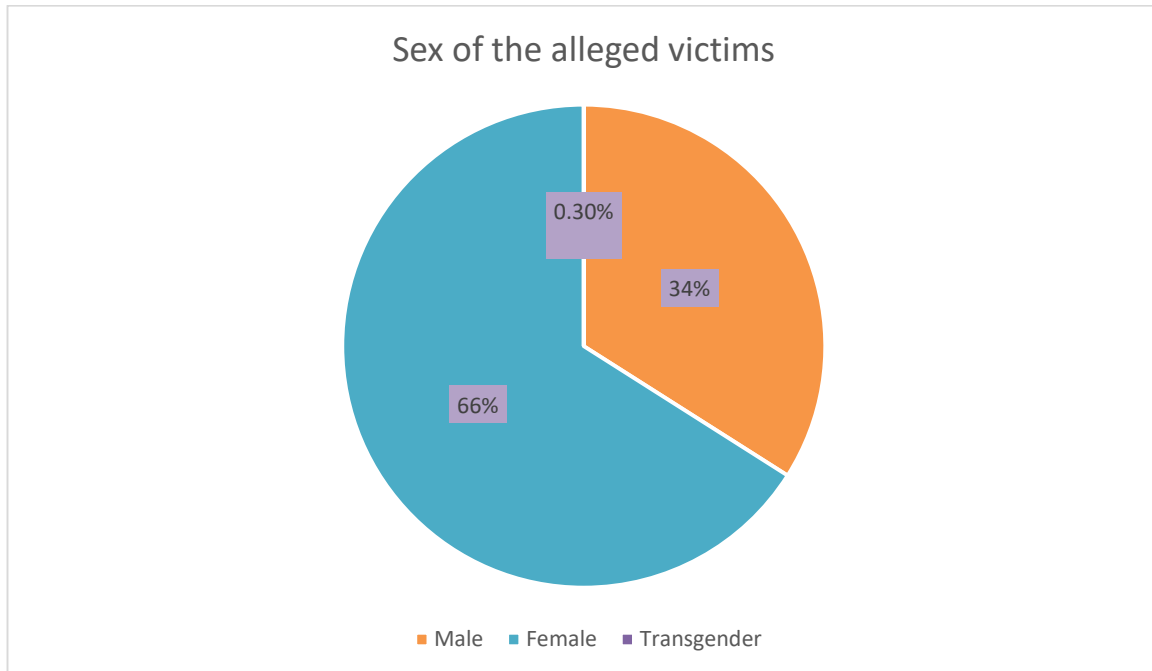
The predominance of men in high positions is a characteristic feature of the European Gender Equality Index. It should also be noted that Greece ranks 73rd among 146 countries in the Global Gender Gap Index, published by the World Economic Forum (WEF) in 2024, marking an improvement from 93rd place in 2023 (World Economic Forum, Global Gender Gap Report 2024). According to the Greek Ombudsman, 47% of complaints filed by public sector employees are against colleagues or work partners, while in the private sector the majority of perpetrators are employers or individuals in a hierarchically superior position to the complainant (86%).<sup>188</sup>

In a broader context, according to the first official study conducted by the Greek General Confederation of Labour (GSEE) and its Secretariat for Gender Equality, in cooperation with the Friedrich Ebert Stiftung (FES), on the phenomenon of sexual harassment and violence in the workplace, 3 out of 4 victims are women employees (75.3%), while only 1.6% of victims filed an official complaint with the competent authorities.

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<sup>188</sup> INE GSEE-FRIEDRICH-EBERT-STIFTUNG, [EUROPEAN SURVEY ON SEXUAL HARASSMENT AT WORK - REPORT FOR GREECE](#), Editor: Athena Malagardi, Statistical analysis: Konstantinos Boukouvalas, Statistical analyst INE GSEE 2024, pages 18-19.

Similar conclusions regarding the gender of the reporting persons (affected) are also drawn from the Annual Report of the Labor Inspectorate.<sup>189</sup> More specifically:



The GNCHR has repeatedly pointed out that incidents of violence and harassment in the workplace remain invisible to a large extent, mainly due to the victims' fear or reluctance to report them to the Authorities.<sup>190</sup> The reasons for this phenomenon are reflected more clearly in the table below:

***Reasons for not reacting to sexual harassment*** <sup>191</sup>

<i>Reasons for not reacting</i>	<i>Percentages</i>
I thought nothing would happen	51,1%

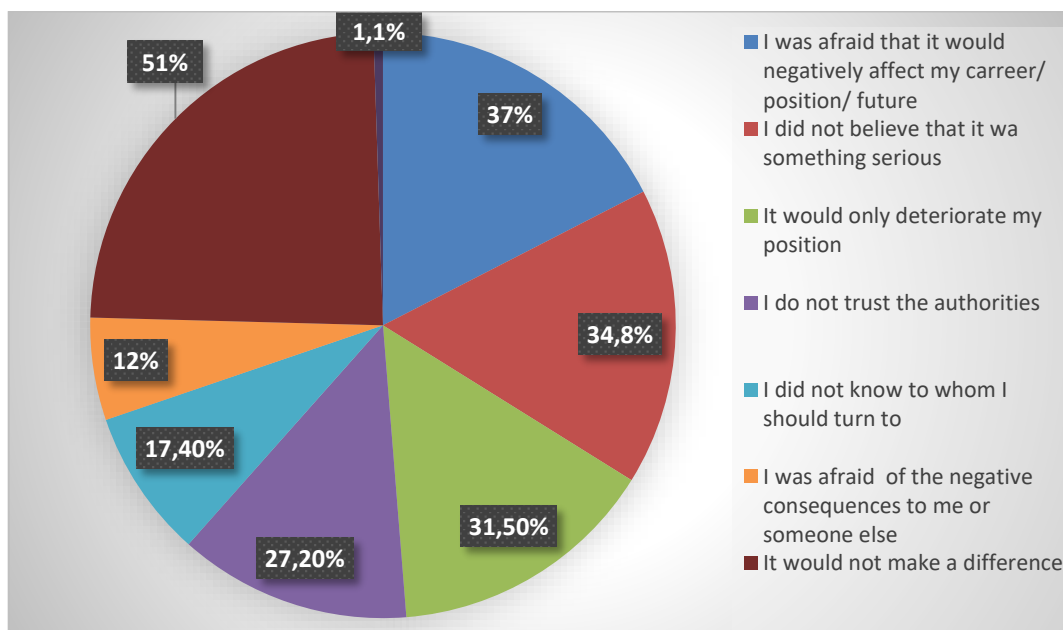
<sup>189</sup> Labor Inspectorate, INDEPENDENT DEPARTMENT FOR THE MONITORING OF VIOLENCE AND HARASSMENT AT WORK, [ANNUAL REPORT 2024 "VIOLENCE & HARASSMENT AT WORK: ZERO VISIBILITY?"](#), March 2025, pages 26-28.

<sup>190</sup> GNCHR [Statement](#) on the phenomenon of sexual abuse in the context of exploitation of power relations in the light of recent reports in the field of sport, 21 January 2021, page 2. See also GSEE, [Press Release](#), GSEE delegation meeting with Deputy Minister of Labour, Ms M. Syregella, Protecting equality in practice will break the silence of victims of gender discrimination, harassment and violence, 25 February 2021. See also herein page 47.

<sup>191</sup> INE GSEE-FRIEDRICH-EBERT-STIFTUNG, [EUROPEAN SURVEY ON SEXUAL HARASSMENT AT WORK - REPORT FOR GREECE](#), Editor: Athena Malagardi, Statistical analysis: Konstantinos Boukouvalas, Statistical analyst INE GSEE 2024, page 21.

I was afraid it would negatively affect my job/position/prospects	37%
I didn't think it was serious enough	34,8%
It would just make things worse	31,5%
I don't trust institutions	27,2%
I didn't know who to turn to or what to do	17,4%
I was afraid it could have negative consequences for me or others	12%
Something else	1,1%

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In June 2021, the GNCHR made thorough comments and proposals on the initiative undertaken by the Ministry of Labour and Social Affairs for the adoption of Law 4808/2021, ratifying, *inter alia*, *ILO Convention No. 190 on the elimination of violence and harassment in the world of work*, with a view to preventing such phenomena, punishing perpetrators and, in particular, providing timely and adequate protection to the victims, on condition that the Convention does not remain ineffective in practice and is accompanied by appropriate

implementing measures.<sup>192</sup> In this respect, the *CEF 190* is a landmark tool, on the one hand because it is the first international convention to explicitly recognise the right to work free from violence and harassment and because it recognises sexual and gender-based harassment at work as forms of gender-based violence that disproportionately affect women.<sup>193</sup> **This ratification was a proposal and a deep-rooted Recommendation of the National Commission to the State as of 2021,**<sup>194</sup> together with Recommendation 206, which was adopted in parallel with the ratification of the CEF190, an essential tool for interpreting and supplementing the Convention, not only because it defines in a specific and detailed manner the relevant implementing measures, but also because it is a valuable source of inspiration for national regulations.<sup>195</sup>

In its extensive *Observations on the Bill of Law 4808/2021*, the National Commission stressed, inter alia, with regard to the definitions of violence and harassment at work, that **they are reproduced directly from the definitions of the Convention, without taking into account the EU acquis in the field of violence and harassment at work**, and ignoring the fact that there are already four (4) basic acts in force in the national legal order, which include - <sup>196</sup> unfortunately in an incoherent manner - the same definitions for the field of

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<sup>192</sup> [GNCHR Observations on the Draft Bill of the Ministry of Labour and Social Affairs](#), entitled: "On the Protection of Employment Establishment of the Independent Authority Labour Inspectorate Ratification of the ILO Convention No. 190 on violence and harassment in the world of work Ratification of the ILO Convention No. 187 on the Promotional Framework for Occupational Safety and Health at Work Incorporation of Directive (EU) 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance for parents and carers" and [Summary of the GNCHR Observations](#) on the Draft Bill of the Ministry of Labour and Social Affairs, 14 June 2021, pages 7, 19, 20, 22-31, 34.

<sup>193</sup> GNCHR [Statement](#) on the phenomenon of sexual abuse in the context of exploitation of power relations in the light of recent reports in the field of sport, 21 January 2021, page 2.

<sup>194</sup> See for example the GNCHR letter to the Minister of Labour and Social Affairs, Mr. K. Hatzidakis, on "Ratification of the Convention 190 of the International Labour Organisation on the Elimination of violence and harassment in the world of work", 20 January 2021, GNCHR, [Statement](#) on the phenomenon of sexual abuse in the context of exploitation of power relations in the light of recent reports in the field of sport, 21 January 2021.

<sup>195</sup> [GNCHR Observations on the Draft Bill of the Ministry of Labour and Social Affairs](#), entitled: "On the Protection of Employment Establishment of the Independent Authority Labour Inspectorate Ratification of the ILO Convention No. 190 on violence and harassment in the world of work Ratification of the ILO Convention No. 187 on the Promotional Framework for Occupational Safety and Health at Work Incorporation of Directive (EU) 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance for parents and carers" 14 June 2021, 22-23. See also ILO, [Handbook](#) of procedures relating to international labour Conventions and Recommendations, 2012, page 2.

<sup>196</sup> More specifically, the basic Acts that regulate the critical concepts of gender, other grounds of prohibited discrimination, violence, harassment and sexual harassment are the following: Law 4531/2018 (A'62) ratifying the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention), Law 4604/2019 (A' 50) on the promotion of substantive gender equality, Law 4604/2019 (A' 50) on the promotion of substantive gender equality, Law 4443/2016 (A' 232) transposing Directive 2000/43/EC on the implementation of the principle of equal treatment of persons irrespective of racial or ethnic origin, Directive 2000/78/EC on the establishment of a general framework for equal treatment in employment and work and other provisions, as well as Law 3896/2010 (A'207) on the implementation of the principle of equal opportunities and equal treatment of men and women in labour and employment matters - Harmonisation of existing legislation with Directive 2006/54/EC of the European Parliament and of the Council of 5 July 2006 and other relevant provisions.



work. With respect to the gender mainstreaming and the phenomenon of violence and harassment in the workplace, the GNCHR reiterated the Committee's *General Recommendation No. 35 on the elimination of discrimination against women*, according to which “*Gender-based violence against women occurs in all spaces and spheres of human interaction, whether public or private, including in the contexts of the family, the community, public spaces, the workplace, leisure, politics, sport, health services and educational settings, and the redefinition of public and private through technology-mediated environments,*”<sup>197</sup> In its Observations, the GNCHR also highlighted the points of confusion and the overlapping responsibilities caused by Law 4808/2021 with regard to the limits of the three (3) jointly responsible Independent Authorities, as defined by law, the Hellenic Labour Inspectorate (SEPE), the Ombudsman and the National Transparency Authority, to the detriment of victims of violence and harassment, as well as the NGOs that support them, pointing out the need for clarification and rewording of these regulations.<sup>198</sup> **The aim of the legislator should always be to encourage and facilitate the complaints, not and not letting the victim find their way through a confusing protection system.** A person wishing to report a violent and harassing behaviour is by definition not aware of all the relevant mechanisms available and is not in a position to assess, without the necessary support, which is the most appropriate. To this end, where more than one Authority are involved, the law should be clear and unambiguous as to the path to be taken. In fact, according to this specific Law, the Labour Inspectorate will not examine ex officio a request for an employment dispute related to violence and harassment, unless the employees themselves explicitly invoke the legal provisions against discrimination and/or harassment and violence. In addition, **according to the GNCHR position, gender and domestic violence are also subject to the provisions of Law 4808/2021, since domestic violence can affect employment.** Furthermore, in the same text of Observations, the GNCHR repeated its firm *Recommendation* to keep reliable statistics regarding all forms of discrimination prohibited by law, as also required by the Istanbul Convention (Law 4531/2018). This *Recommendation*, especially with regard to gender mainstreaming in critical areas of work, is reflected in the ILO's CEACR Report 2021,<sup>199</sup> as well as in all the *Concluding Observations* of the CEDAW on our country so far.<sup>200</sup> Indeed, in

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<sup>197</sup> Convention on the Elimination of all forms of Discrimination against Women, [General Recommendation No. 35](#) on gender-based violence against women, update of the General Recommendation No. 19, CEDAW/C/GC/35, 14 July 2017, paragraph 20.

<sup>198</sup> [Observations by the Greek National Commission on Human Rights \(GNCHR\)](#) on State's draft reply to the list of issues prior to the submission of the combined Eighth and Ninth Periodic Report under the Convention on the Elimination of Discrimination against Women (CEDAW), 9 April 2023, pages 24-25.

<sup>199</sup> ILO International Labour standards implementation 2021, [Report III /Annex \(Part A\)](#), Annex to the 2020 Report of the Committee of Experts on the Implementation of Conventions and Recommendations, International Labour Organisation, 109th Session, 2021, pages 454-455.

<sup>200</sup> See CEDAW/C/GRC/CO/7 Concluding observations on the seventh periodic report of Greece adopted by the Committee at its fifty fourth session [CEDAW/C/GRC/CO/7](#), 26 March 2013, paragraphs 28-29

its *Concluding Observations*, the CEDAW emphatically points out to the Greek State its concerns about the absence of gender-specific statistics on complaints related to gender discrimination and sexual harassment at work, recommending the collection of data by gender, geographical location and minority with regards to the employment situation of women and men in order to monitor and improve women's working conditions.<sup>201</sup>

It is considered appropriate here to refer to the relevant reports of the Ombudsman on an invisible phenomenon, noting that the number of incidents of sexual harassment at work is inconsistent with the number of complaints, mainly because of the victims' fear of losing their jobs or of any labour and legal retaliation by the employer.<sup>202</sup> The GNCHR shares the concerns of the Ombudsman, who, based on the cases handled so far, concludes that: **a)** apart from the right to report, there is no other specific administrative procedure for the protection of the person who is subjected to harassment, contrary to the provisions of Law 4808/2021 applicable to the private sector **b)** complainant civil servants are not entitled to actively participate in the investigation of their case (e.g. to be informed of the content of the statements made by the witnesses in the case, to support their complaint with additional evidence) **c)** the procedure for the examination of complaints is very lengthy and **d)** the relevant complaints are not forwarded to the Ombudsman, despite the obligation of the services receiving them to do so.

The *UN Working Group on discrimination against women and girls*, following its visit to Greece in April 2019, underlined that “sexual harassment in the workplace is prohibited by law, but there is no national-level data collected about its prevalence.”<sup>203</sup> The same conclusions are drawn by the UN Committee on the Elimination of all forms of discrimination against women<sup>204</sup> and the ILO's CEACR in its 2021 report.<sup>205</sup> In its report, the *UN Working Group on discrimination against women and girls* recommended to the Greek authorities

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[CEDAW/C/GRC/CO/8-9](#) Concluding observations on the combined eighth and ninth periodic reports of Greece, 20 February 2024, paragraphs 34,(a), 50.

<sup>201</sup> See [CEDAW/C/GRC/CO/7](#) Concluding observations on the seventh periodic report of Greece adopted by the Committee at its fifty fourth session [CEDAW/C/GRC/CO/7](#), 26 March 2013, paragraphs 28- 29, 32, 39. [CEDAW/C/GRC/CO/8-9](#), Concluding observations on the combined eighth and ninth periodic reports of Greece, 20 February 2024, paragraph 34(a)(iv).

<sup>202</sup> Ombudsman, Equal treatment. [2017 Special Report 2017](#), page 36. See, respectively, GSEE [Press Release](#), Meeting of the GSEE delegation with the Deputy Minister of Labour Mrs. M. Syregella. Protecting equality in practice will break the silence of victims of gender discrimination, harassment and violence, February 25, 2021.

<sup>203</sup> [Report](#) of the *UN Working Group on discrimination against women and girls in legal, policy and institutional framework*, following its official visit to Greece from 1 to 12 April 2019, A/HRC/44/51/Add.1, 29 June 2020, paragraph 35.

<sup>204</sup> See [UN CEDAW Concluding Observations](#) on the combined fourth to sixth Periodic Report of Greece adopted by the Committee at its fifty fourth session [CEDAW/C/GRC/CO/7](#), 26 March 2013, paragraphs 28-29. UN [CEDAW/C/GRC/CO/8-9](#): Concluding observations on the combined fourth to sixth Periodic Report of Greece, 19 February 2024, paragraphs 34(a)(iv).

<sup>205</sup> ILO International Labour standards implementation 2021, [Report III /Annex \(Part A\)](#), Annex to the 2020 Report of the Committee of Experts on the Implementation of Conventions and Recommendations, International Labour Organisation, 109th Session, 2021, pages 454-455.

“stronger regulatory measures and accountability mechanisms in the public and private sectors”, to make progress on the prevention of violence and harassment at work.<sup>206</sup>

However, a positive step towards encouraging complaints is the establishment, by Law 4795/2021, of an *Independent Office of an Integrity Advisor* in each Ministry, with the responsibility to handle cases of sexual harassment, discrimination, intimidation and moral harassment.<sup>207</sup> The GNCHR has expressed its concerns about the limits of the powers conferred on the Office with regard to cases of harassment at work, underlining the **need for clear and explicitly stipulated procedures for the protection of victims in the private and public sectors and the implementation of relevant coordinated actions by all competent bodies**. To this end, given that Greece has been internationally criticized for its progress on equality issues, the GNCHR underlines the need to carry out systematic actions, encouraging victims to submit complaints and monitoring the progress of their investigation.



In the light of the above the GNCHR addresses the following recommendations to the Greek State:

- 1. The GNCHR calls on the competent bodies to take urgent measures to ensure full implementation (i) of the right to judicial protection of victims of harassment and/or sexual harassment on grounds of sex and other prohibited discrimination at work, and (ii) the right of the victim of harassment and/or sexual harassment on the grounds of sex and other prohibited discrimination to apply to the competent administrative authorities.**
- 2. The GNCHR calls on the competent bodies to promote the development of internal complaints/reports management policies for incidents of violence and harassment in the public and private sectors, including all companies, regardless of the number of people they employ, and to carry out targeted actions to raise awareness of victims'**

<sup>206</sup> [Report](#) of the UN Working Group on discrimination against women and girls in legal, policy and institutional framework, following its official visit to Greece from 1 to 12 April 2019, A/HRC/44/51/Add.1, 29 June 2020, paragraph 37.

<sup>207</sup> Law 4795/2021 “Internal Audit System of the Public Sector, National Integrity Council in the Public Administration and other provisions for the public administration and local government” (Official Government Gazette A 62/17.04.2021)

*rights. At the same time, measures must be taken to protect complainants, and provisions should be explicitly included in the ESIDF for mapping protection gaps with regard to violence and/or harassment in the world of work and for adopting appropriate administrative measures to ensure effective and timely compliance of the Greek government with its obligations under international and European commitments undertaken.*

*3. The GNCHR calls on the competent bodies to carry out specific actions and take targeted measures in the public and private sector making use of the content of Recommendation 206, such as flexible working arrangements, risk assessment in the workplace by the employer, scheme for referral to public measures aimed at mitigating the phenomenon, where feasible, consultation with the collective bodies of employees and employers, raising awareness about the impact of domestic violence in the world of work, etc, with a view to an integrated approach to safety and health at work.*

*4. The GNCHR calls on the competent authorities to promote the establishment of mechanisms for assessing the risk of violence, harassment and sexual harassment in the workplace involving employers and employees as well as their representatives and to take measures for the prevention and management of such risks in the context of the promoted applicable arrangements set out in the ILO Convention 190 and in Recommendation 206.*

*5. The GNCHR calls on the competent bodies to undertake education and training actions for the staff of the three Independent Authorities - SEPE, the Ombudsman and the National Transparency Authority - as the authorities in charge of preventing and combating violence and harassment and protecting victims at work.*

*6. The GNCHR reiterates its constant Recommendation to collect and keep regular and reliable statistical data for all forms of discrimination prohibited by law, an obligation explicitly laid down in the Istanbul Convention.*

*7. The GNCHR, aligned with the Istanbul Convention (Law 4531/2018), recommends to explicitly provide for the possibility of cooperation with civil society organisations with proven experience in supporting surviving victims of sexual harassment and action to prevent and address gender-based violence in the workplace. It is also noted that the majority of organisations supporting surviving victims of gender-based violence and vulnerable population groups follow and implement, according to their internal procedures, a specific policy on Protection Against Sexual Exploitation and Abuse (PSEA) along with relevant protocols, which could serve as good examples and be used in the context of experience and know-how exchange with trade unions and employers' organisations.*

*8. It is proposed to include an explicit regulation in the existing legislative framework on protection during pregnancy and in connection with family responsibilities.*



### E. Equal participation of women in political and public life

The gap between men and women in terms of their participation in political and public life remains significant. As mentioned above, according to the Gender Equality Index,<sup>208</sup> Greece is consistently ranked at the bottom of the EU in terms of equality, with a disappointing performance as regards the presence of women in positions of power, as our country ranks lowest among the 27 Member States. In 2023 Greece's score in the area of women's participation in positions of power was 30.4%, with the EU average being 59.1, while in 2022 it was 28.8%, with the EU average being 57.2%.

#### *Participation rate of women in positions of power*

Participation of women in positions of power	EU	Greece
2024	61.4%	33.2%
2023	59.1%	30.4%
2022	57.2%	28.8%
2021	55%	27%

EIGE – Gender Equality Index, Comparing Power scores

Given the circumstances, in September 2021 the GNCHR, in *its Observations on the 2021-2025 Greek National Gender Equality Action Plan of the Ministry of Labour and Social Affairs*, proposed the **inclusion of targeted Actions and not just informative and awareness-raising Actions, with a view to increasing the number of women in politics**, in the spirit

<sup>208</sup> EIGE Gender Equality Index 2022 Greece, European Commission, [2023 report on gender equality in the EU](#), page



of the European Commission's own Communication "*A Union of Equality - Gender Equality Strategy 2020-2025*",<sup>209</sup> where priority is given to the participation of women as voters and candidates in the 2024 European Parliament elections, in cooperation with the European Parliament itself, national parliaments, member states and civil society, through, inter alia, funding and promoting best practices. As the European Commission notes in its Communication, **equal opportunities in participation is of crucial importance for representative democracy at all levels – European, national, regional and local**. The European Parliament chose International Women's Day 2019 to mark and highlight the huge contribution of women in politics at European and national level, encouraging them to vote and stand as candidates in the next European elections.<sup>210</sup>

More recently, in April 2023, the GNCHR, in [its Observations on State's draft reply to the list of issues prior to the submission of the combined Eighth and Ninth Periodic Report under the Convention on the Elimination of Discrimination against Women \(CEDAW\)](#), was pleased to note that the quotas for women's participation in political and public life are gradually increasing in law and in practice. In terms of legislation, a number of laws are coming to integrate the gender mainstreaming across all policies. Law 4555/2018 on the Reform of the Institutional Framework of Local Government increased the gender quota for all candidates for regional, municipal and community councils from 33% to 40%. Subsequently, Law 4604/2019 on *Substantive Gender Equality* increased the existing gender quota for parliamentary elections from at least 33% to at least 40% of the total number of candidates. Law 4706/2020 on *Corporate Governance of Limited Liability Companies and Capital Market Modernisation, transposition of Directive (EU) 2017/828 of the European Parliament and of the Council, measures for the implementation of Regulation (EU) 2017/1131 and other provisions* introduced a 25% quota for the representation of women on the boards of directors of companies listed on the Athens Stock Exchange. Law 4276/2020 on *the reform of the institutional framework of candidatures in sports entities, distinguished escorts for athletes with disabilities, establishment of the National Platform for Sporting Integrity, the Hellenic Olympic Committee (EOE), the Hellenic Paralympic Committee (EPA) and other provisions* also introduces a quota with positive effect on the balanced participation of men and women in the administrations of sports clubs.

As regards the assessment of the regulatory framework so far in practice, it should be noted that **despite the progress made, it is apparent that women still do not enjoy the same rights in this area**. As noted by the GNCHR in its [Observations by the GNCHR on State's draft reply to the list of issues prior to the submission of the combined Eighth and Ninth](#)

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<sup>209</sup> [Communication](#) from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, *A Union of Equality, Gender Equality Strategy 2020-2025* (COM(2020) 152) final, 5 March 2020, page 15. See also [Communication](#) from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, *A Union of Equality, Gender Equality Strategy 2020-2025* (COM(2020) 258 final, 24 June 2020.

<sup>210</sup> European Parliament, Multimedia Centre, [Women in Politics: International Women's Day 2019](#).



Periodic Report under the Convention on the Elimination of Discrimination against Women (CEDAW), Law 4706/2020 does not clarify how the competent authorities will monitor this, nor whether there are mechanisms in place to track changes in the gender composition of administrative boards. Furthermore, besides the reference to criteria differentiating the selection of board members (Article 3(1)(c)), there is no direct reference to the representation of transgender persons in the composition of the board. Finally, the question arises here whether there is any information on the effective application of these provisions of Law 4706/2020. In practice, application is always lagging behind, as observed by the *UN Working Group on Discrimination against Women and Girls* following its visit to Greece in April 2019.<sup>211</sup> And of course, another key challenge that prevents progress is the lack of available and reliable data and therefore the capacity to record and monitor the situation. Similarly, the *European Committee of Social Rights* notes that the proportion of women on private companies boards has increased slightly in recent years, but still remains very low. Accordingly, under Law 4276/2020 (Article 2 - General Assembly of a sports club - Elections - Amendment of Article 5 of Law 2725/1999), the number of candidates of each gender must be at least equal to one third (1/3) of the number of seats to be elected, including that of the president.

The GNCHR has expressed its satisfaction with the election by the Hellenic Parliament in 2020 of the first female President of the Hellenic Republic, as well as with the fact that, in the field of justice, both Presidents of the Supreme Courts — namely the Court of Cassation (Areios Pagos) and the Council of State — are women. At the same time, the GNCHR points out with deep concern that women continue to be under-represented in all high political offices. Still, even minor improvements in the situation are seen in a positive light. For instance, in 2020 only 6 out of 53 members of the Council of Ministers were women, in contrast to 16 out of 53 members in 2024, given that the gender quota is now at least 40% of the total number of candidates in parliamentary elections and not of the number of elected members.<sup>212</sup> In the Municipal and Regional elections of 2022, out of a total of 332 municipalities, only 23 (22) female mayors (6.62%) were elected,<sup>213</sup> out of which 6 female Mayors in the 66 municipalities of Attica (9.91%) and none of the Regional Governors was

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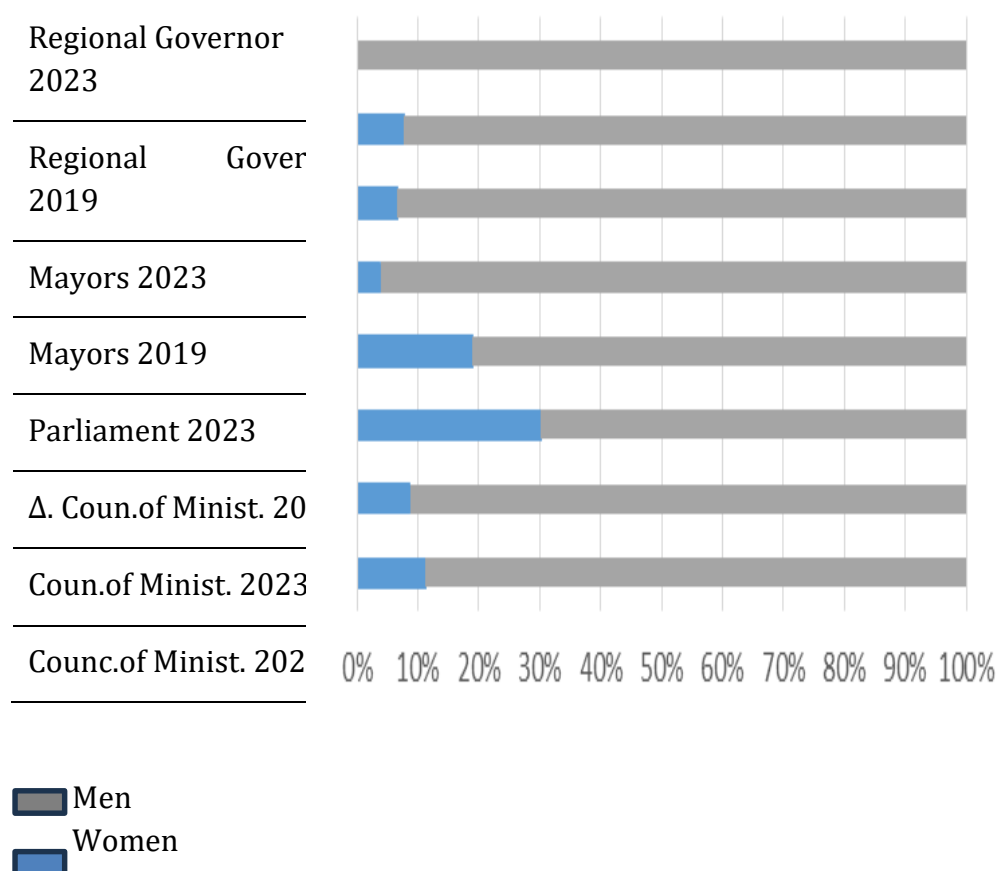
<sup>211</sup> [Report](#) of the *UN Working Group on discrimination against women and girls in legal, policy and institutional framework*, following its official visit to Greece from 1 to 12 April 2019, A/HRC/44/51/Add.1, 29 June 2020, paragraph 12, 30, 86.

<sup>212</sup> Law 4604/2019 increased the existing gender quota for parliamentary elections from at least 33% to at least 40% of the total number of candidates. Furthermore, Law 4555/2018 on the reform of the institutional framework of Local Government increased the gender quota for the total number of candidates in regional, municipal and community councils from 33% to 40%. See also [GNCHR Observations](#) on Greece's combined 23rd and 24th periodic report to the Committee on the Elimination of Racial Discrimination (CERD) of the International Convention on the Elimination of All Forms of Racial Discrimination, July 2021, pages 55-57.

<sup>213</sup> Out of the 1,222 municipal combinations in total, 1,047 men and only 164 women (13.5%) stood for the mayoralty of 332 municipalities as party leaders. Respectively out of the 78 regional combinations for the 13 Regions of the country, 67 men and only 11 women (14.1%) claimed the position of Regional Governor. See also Central Union of Municipalities and Communities of Greece (KEDE), [Municipal Elections 2023](#).

a woman, in contrast to the 2019 Municipal and Regional elections, where only 13 female Mayors and only one female Regional Governor were elected. In essence, the quotas that were established to ensure women's participation in elections<sup>214</sup> have proven so far not to have contributed to an increase in elected representatives. According to a survey conducted by the European Commission on gender equality in Europe, Greece is ranked among the Member States with the lowest representation of women in National Parliaments (19%) and in Councils of Ministers (8.7%).<sup>215</sup> Similarly, according to EIGE data for the first quarter of 2025, the percentage of women in the National Parliament reaches 23,3%, while the corresponding European average stands at 32.7% .<sup>216</sup>

### ***Representation of women in Parliament and Local Government***

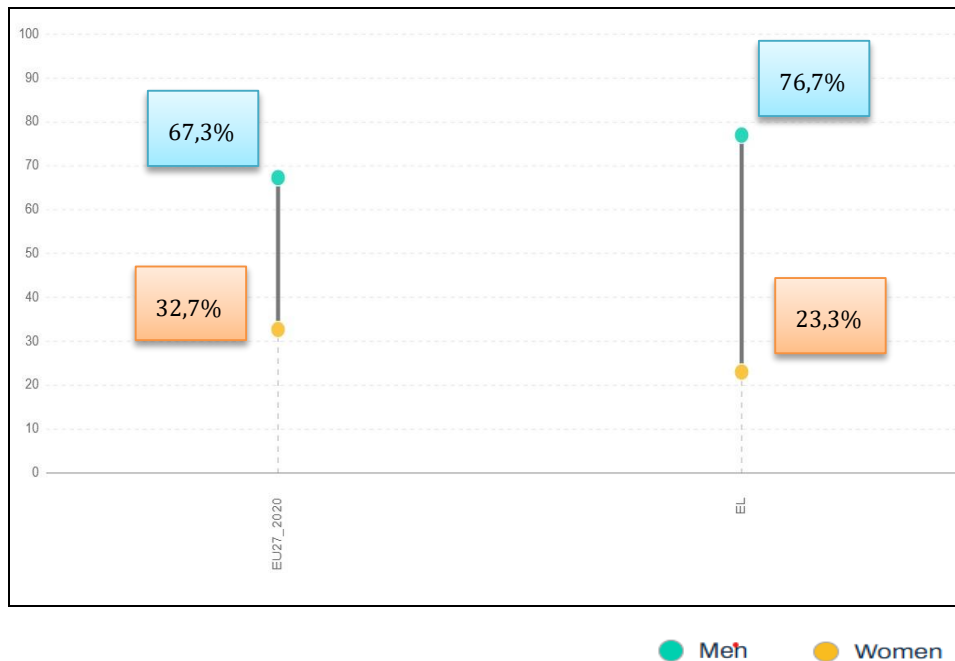


<sup>214</sup> National and European elections. Law 4604/2019 increased the existing gender quota for parliamentary elections from at least 33% to at least 40% of the total number of candidates. Furthermore, Law 4555/2018 on the reform of the institutional framework of Local Government increased the gender quota for the total number of candidates in regional, municipal and community councils from 33% to 40%.

<sup>215</sup> European Commission, [2023 report on gender equality in the EU](#), pages 35, 36.

<sup>216</sup> EIGE, [National parliaments: presidents and members](#), 2025-Q1

### EIGE, Representation of women in Parliament, 2025-Q1



Finally, as regards the **position of women belonging to vulnerable groups, the situation is deteriorating dramatically**, since they face significant obstacles to engaging in political life. To date, **no Roma woman has been elected to the Hellenic Parliament** or appointed to positions in the government, which highlights the severe lack of opportunities for these women to participate in decision-making processes<sup>217</sup> At the same time, there are only a few cases of women with disabilities who have been elected to the Hellenic Parliament, while there is no specific initiative so far to promote or encourage their active participation in political life. In this respect, it should be stressed that the participation of women with disabilities in politics is more limited in comparison to that of men with disabilities. Moreover, although the ESDIF includes a pillar on women's political participation in political and public life, it does not include any action specifically focused on women with disabilities<sup>218</sup> Similarly, the *2020-2023 National Action Plan on the Rights of persons with Disabilities*, does not provide for measures to ensure the participation of women with disabilities in political and public life. Therefore, the inclusion of actions to increase the representation of women with disabilities in politics within the framework of a Gender Equality Strategy is now of utmost importance. It is also recalled that, as indicated in the *EU Gender Equality Strategy 2020-2025*, equal opportunities for participation are essential for

<sup>217</sup> Contribution of the GNCHR to the preparation of the New National Strategy for the Social Inclusion of Roma for the period 2021-2027, 8 March 2021

<sup>218</sup> Observations by the GNCHR on the implementation of the Convention on the Elimination of All Forms of Discrimination against Women following the drafting of the list of issues (CEDAW), 2 January 2024 paragraph 23, page 8 and *Observations of the GNCHR on the 2021-2025 National Action Plan for Gender Equality of the Hellenic Ministry of Labour and Social Affairs*, 27 September 2021, pages 47-48.

representative democracy at all levels, national, local, regional and European. The recent Law 5023/2023 does extend the principle of equal treatment and non-discrimination for persons with disabilities to more socio-political sectors; however, the **legal framework of substituted decision-making still applies, which restricts the legal capacity of persons with intellectual or psychosocial disabilities.**



As the GNCHR pointed out in its parallel report to the *CEDAW Committee* in January 2024 and thoroughly in its *Observations on the 2023 State's Report* **the issue of women's under-representation in leadership positions in the public sector<sup>219</sup> is a pervasive problem that requires ongoing commitment to address.** Indicative is also the fact that the no gender experts participated in the Committee for the Management of Emergencies due to Infectious Diseases, established in February 2020 to fight the pandemic, despite the fact that many of the proposed measures would directly affect the lives of women, especially those with children. The Commission was composed of 26 members, including 8 women and 18 men, all of whom were health experts (representing 30.8% of women).<sup>220</sup> Considering the complexity of the situation, the GNCHR calls on the competent State authorities and stakeholders to take all appropriate measures to **ensure an inclusive environment of participation and representation that values diversity and prioritizes the development of women's leadership skills.**

In May 2023, the GNCHR launched a large-scale campaign for the equal representation of women in politics, with a TV and a radio spot entitled *Decide Equally - Vote Equally*, highlighting the need for voters to decide and vote equally on the basis of candidates' abilities and values and not on the basis of outdated gender prejudices.<sup>221</sup>

The GNCHR, taking into account that achieving the objective of equal participation of women and men in decision-making centres is crucial to the balance of society and

<sup>219</sup> Observations by the Greek National Commission of Human Rights (GNCHR) on State's draft reply to the list of issues prior to the submission of the combined Eighth and Ninth Periodic Report under the Convention on the Elimination of Discrimination against Women (CEDAW), 9 April 2023, , pages 18, 20, 26.

<sup>220</sup> Kakepaki, M., *Women in Governance*, National Centre for Social Research EKKE, Athens 2022.

<sup>221</sup> GNCHR Press Release, *Decide equally - Vote equally*, May 4, 2023.

necessary for the strengthening and proper functioning of democracy,<sup>222</sup> and under the present circumstances, submits the following *Recommendations*:

- 1. The GNCHR calls on the competent authorities to implement strategies and measures that enhance gender-balanced representation in decision-making positions in politics and in policy-making.***
- 2. The GNCHR recommends that the competent bodies provide incentives and promote corresponding measures to achieve gender balance in the composition of political party membership, such as encouraging parties to increase the number of female members in order to obtain public funding, in line with the corresponding actions provided in the EU Gender Equality Strategy 2020-2025.***<sup>223</sup>
- 3. The GNCHR Encourages the media and communication outlets to systematically highlight the issue of equal participation of women in political and public life, thereby fostering a change in societal attitudes and challenging gender-based stereotypes.***
- 4. The GNCHR calls on the State to organise systematic actions and information campaigns aimed at eliminating the prejudices and stereotypes prevalent in Greek public opinion and the Greek media regarding the role of women in the economic life of the country, as a main channel for changing attitudes. At the same time, targeted actions should be integrated in the Corporate Social Responsibility agenda of companies implementing equivalent programmes and measures. Finally, particular importance is also attached to education and training actions for girls and women in leadership roles and additional supporting measures, as well as measures to monitor the effective implementation of legislation.***

## **F. Marriage, Civil Partnership Pact and Family life**

The GNCHR monitors thoroughly the issue of eliminating discrimination against the LGBTIQI+ community and the enshrinement of their fundamental rights on the basis of supra-legislative rules requiring the elimination of stereotypes and social prejudices, and has from the outset advocated the legalisation of same-sex partnerships. As early as 2004, the GNCHR in its *Plenary Assembly Decision - Opinion on issues related to discrimination against sexual minorities in Greece (following a request by Amnesty International)* and the *extension of civil marriage to same-sex couples (following a request by the Homosexual and Lesbian Community of Greece/OLKE)*, had stressed **the need for legal recognition of same-sex partnerships on the basis of the principles of international human rights law relating to sexual orientation and gender identity**, in order to eliminate discrimination

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<sup>222</sup> See [Beijing Platform for Action](https://eige.europa.eu/beijing-platform-for-action), 4th World Conference on Women 1995, point 181. See also: <https://eige.europa.eu/beijing-platform-for-action>

<sup>223</sup> [Communication](#) from the Commission to the European Parliament, the Council, The European Economic and Social Committee and the Committee and the Committee of the Regions, A Gender Equality Strategy 2020-2025 (COM(2020) 152) final, 5 March 2020, page 16.

against same-sex persons at all levels and to promote the full enjoyment of their political, economic, social and cultural rights.<sup>224</sup> A few years later, in November 2013, following the condemnatory judgement against Greece by the European Court of Human Rights (ECtHR) in the case of *Vallianatos and Others* of 9 November 2013,<sup>225</sup> the GNCHR sent a letter to the Minister of Justice, reminding him of its earlier positions on the need for legal recognition of same-sex partnerships. It is noted that in the aforementioned judgement of the ECtHR, repeatedly refers to and takes into account the relevant positions of the GNCHR. (paragraphs 12, 15, 21-24, 87 and 89).<sup>226</sup>

In December 2015, the GNCHR in its Observations on the bill of Law on the civil partnership, welcomed and endorsed both the spirit and the letter of the law, stressing in principle that **the inclusion of same-sex couples in the civil partnership pact restores a flagrant discrimination of the past**. Law 4356/2015 “*Civil partnership pact, exercise of rights, penal and other provisions*” was undoubtedly a very important first step of the State toward the more effective protection of the rights of the LGBTQI+ community. However, more than eight (8) years after its entry into force, the GNCHR observes that its implementation has revealed several problems.

In April 2021, the GNCHR in its *Observations* on the Bill of the Ministry of Justice “*Reforms on parent-child relations, other issues of family law and other urgent provisions*”, recognising the wide range of family models, stressed the **need to broaden the narrow definition of the family by including the social interactions in the life of LGBTQI+ families and the revision of the concept of marriage and the persons who enter into it**, while taking appropriate implementing measures, in line with the [2020-2025 EU LGBTQI Equality Strategy](#), so that children living in “rainbow families” enjoy the right to equal treatment and respect for their family life.<sup>227</sup>

Shortly thereafter, in June 2021, in a [Memorandum](#) sent to the Committee set up by the Prime Minister for the elaboration of the National Strategy for Equality of LGBTQI+ persons,<sup>228</sup> the National Commission, reiterating all its standing positions, proceeds with a series of Observations **on the substantive equality of treatment of LGBTQI+ persons and the effective prevention and fight against all forms of gender discrimination**. The GNCHR confirms that **the recognition of the right to marriage for all couples, regardless**

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<sup>224</sup> See “Decision-opinion of the GNCHR Plenary Assembly on issues related to discrimination against sexual minorities in Greece (at the request of the Amnesty International) and the extension of civil marriage to same-sex couples (at the request of OLKE)”, GNCHR, [Annual Report 2004](#), page 183.

<sup>225</sup> ECtHR, *G. V. v. Greece*, application no. 29381/09 and 32684/09, 7 November 2013.

<sup>226</sup> See also the Informative Note: The National Commission for Human Rights (GNCHR) in the case law of the European Court of Human Rights (ECtHR), January 2015, pages 9-10.

<sup>227</sup> [GNCHR Observations](#) on the Bill of the Ministry of Justice “Reforms on parent-child relations, other issues of family law and other urgent provisions” 15 April 2021, pages 2-3.

<sup>228</sup> [Memorandum](#) of the National Commission for Human Rights (GNCHR) to the Committee set up by the Prime Minister for the elaboration of the National Strategy for the Equality of LGBTQI+ persons, 30 June 2021, pages 10-12.



**of the gender of the partners, with full rights (spousal benefits, allowances, parental leave, child custody and parental responsibility, adoption rights, pension, inheritance, and other tax-related matters)** is an urgent necessity and a longstanding demand of the LGBTQI+ community. Specifically, a key finding is the issue of changing the details of one of the two parties in the civil partnership. It is therefore observed that in cases where one party to a civil partnership proceeds with the legal recognition of their gender identity, the civil registry modification of personal data "conflicts" with the existence of the family record that has been created on the basis of the civil partnership. As a result, in order for the data modification to be completed, the registration of the civil partnership must be suspended. This issue highlights the necessity for appropriate intervention in the institutional framework, so that civil registry records can be corrected without requiring the annulment of the pre-existing civil partnership registration. Moreover, in its [Memorandum](#), the GNCHR reiterates emphatically that provisions should be enacted with regard to the retroactive legal recognition of same-sex marriages of Greek citizens lawfully performed abroad—whether with another Greek citizen or a foreign national—provided such marriages remain valid, as well to the legal status of any children acquired during the course of such marriage. This gap was restored by Law 5089/2024 "*Equality in Civil Marriage and Amendment to Other Provisions of the Civil Code*", which allows for the recognition of all parental relationships established abroad, without exception, as well as for the recognition of their children...

In its *Observations on the 2023 State's Report*, the GNCHR calls on the State to amend existing family laws with the aim of guaranteeing full matrimonial rights to all individuals, regardless of gender, while ensuring the fundamental rights of children living in "rainbow families".

Finally, the GNCHR shall also remind at this point its standing Recommendation, running through all its *Observations on the 2021-2025 ESDIF*,<sup>229</sup> calling on the competent state authorities to enhance the effective participation of women through their Representatives and Associations, as well as LGBTQI+ organisations, in the planning, implementation, monitoring and evaluation of measures, Actions and policies to address their challenges and needs. The GNCHR takes this opportunity to express its deep disappointment at the failure of the relevant state authorities to take concrete measures to train legal professionals, including judiciary, national communities and religious officials despite its Recommendations to the contrary.<sup>230</sup>

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<sup>229</sup> [GNCHR Observations](#) on the 2021-2025 Greek National Gender Equality Action Plan, of the Hellenic Ministry of Labour and Social Affairs, 27.09.2021, pages 8, 15, 25.

<sup>230</sup> [Observations by the Greek National Commission of Human Rights \(GNCHR\)](#) on State's draft reply to the list of issues prior to the submission of the combined Eighth and Ninth Periodic Report under the Convention on the Elimination of all forms of Discrimination against Women (CEDAW), 9 April 2023, paragraph 87, page 31 and [Observations by the GNCHR on the 2021-2025 National Action Plan for Gender Equality of the Hellenic Ministry of Labour and Social Affairs](#), 27 September 2021, pages 23-24.



**A decisive step in the effective enjoyment of equal treatment of LGBTQI+ persons** and the effective prevention and fight against all forms of gender discrimination, was the adoption of **Law 5089/2024 “Equality in Civil Marriage and Amendment to Other Provisions of the Civil Code and other provisions”** of the Minister of State, which established **civil marriage for same-sex couples** and was welcomed by the GNCHR in its Observations on the relevant Bill. In its Observations submitted in February 2023, the GNCHR welcomed a) the extension of the application of the principle of equal treatment in the areas of social protection, education and access to the provision and supply of goods and services b) the removal of the celibacy condition in cases where legislation on Legal Gender Recognition applies c) the elimination of gender discrimination in the legislative designation of the surname of children in cases where the parents have not made a choice, d) the protection against the dismissal of same-sex parents and the extension of rights and benefits to same-sex spouses and parents.

The negative aspects of the law are the following: i) the only procedure for establishing kinship between LGBTQ+ persons and family patterns remains adoption of a child, either jointly or in the form of stepparent adoption, (ii) the request for recognition of the presumption of parenthood for children born in wedlock or under a civil partnership pact is not met, nor is the request to extend the right to voluntary notarially attested recognition of children born out of wedlock (for example, during the procedure for participation in Medically Assisted Reproductive technology (MART)), as is currently the case for heterosexual married persons iii) the recognition of rights to family links concluded or recognised abroad will create a two-speed phenomenon with regard to the scope of the rights recognised, thus clearly discriminating against LGBTQI+ persons living in Greece and iv) the failure to provide the option to change the registered sex of the transgender parent in the civil registry documents of their children, in order to prevent discrepancies between parent and child registrations.

In view of the above, the GNCHR, advocating the adoption of a human-centred approach to gender discrimination, submits the following *Recommendations*:

- 1. The GNCHR recommends that the competent state authorities proceed with the recognition of the right to marriage along with the recognition of parental rights, irrespective of any subsequent adoption through judicial proceedings in order to establish kinship.***
- 2. The GNCHR proposes that the competent state authorities explicitly provide for the legal recognition of the parental role of non-biological parents, whether or not there is a civil partnership between the two adult parties during the period in question.***
- 3. The GNCHR calls on the State to recognise the presumption of parenthood for children born in wedlock or under a civil partnership pact, as well as the possibility to extend the right to voluntary, notarially attested recognition of children born out of wedlock.***
- 4. The GNCHR proposes an amendment to Article 5(2) of Law 4491/2017, so that when a Legal Gender Recognition of a transgender parent occurs— and consequently the***

*registered gender of the trans parent is changed in civil registry records — the civil registry records of their children should be changed accordingly, are also amended accordingly, in order to avoid discrepancies between parent-child registry entries.*

*5. The GNCHR calls on the State to ensure the modification of the psychiatric classification systems of mental disorders, in line with current developments aimed at fully de-psychiatrizing trans identities, so as to ensure that transgender/transsexual persons, including children, are no longer stigmatized.*

*6. The GNCHR recommends that the competent state authorities extend access to MART in our country to all persons regardless of gender.*

#### *i) LGBTQI+ Persons and gender identity*

Monitoring the unfolding developments, the GNCHR soon realised the **need for full institutional recognition of gender identity** as a fundamental dimension of the individual's personality. Therefore, in a detailed report on *Transgender Persons and the Legal Gender Recognition*, as early as October 2015, it addressed a comprehensive set of Recommendations to the State urging it to proceed with the Legal Gender Recognition urging it to proceed with the legal recognition of gender identity through the establishment of appropriate procedures ensuring it. One of the main conditions for the implementation of the right in practice, as **pointed out by the Commission, is to grant the possibility of changing the identification documents of transgender individuals based on their gender identity self-determination**, with no requirement for irreversible gender reassignment surgeries or other medical procedures.<sup>231</sup>

In June 2017, the GNCHR in its letter to the *Secretary General for Transparency and Human Rights* of the Ministry of Justice, with regard to the Bill of the Ministry on the “Legal Gender Recognition – National Mechanism for the Monitoring and Evaluation of the National Action Plan on the Rights of the child”, welcomed the establishment and setting up of a special legal preparatory committee entrusted with the task of the drafting of a Bill on the legal gender recognition, drawing nonetheless the State’s attention to specific practical issues. Special emphasis had been put by the Commission on the condition of celibacy provided for in Article 3(3) of Law 4491/2017 in order to correct the registered gender, which in essence obliges transgender persons to divorce in case they are married, thereby discriminating against married persons, and particular attention was drawn to the issue raised by the absence of provision for legal gender reassignment recognition of transgender minors as well as intersex persons.<sup>232</sup> It is indeed disappointing that six (6) years after the entry into

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<sup>231</sup> GNCHR Report and Recommendations: [Transgender Persons and the Legal Gender Recognition](#), 23 October 2015, page 54.

<sup>232</sup> [Bill of the Ministry of Justice, Transparency and Human Rights “Legal Gender Recognition – National Mechanism for the Monitoring and Evaluation of the National Action Plan on the Rights of the Child”](#), Letter of the GNCHR to Maria Giannakaki, Secretary General of Transparency and Human Rights - Hellenic Ministry of Justice, Transparency and Human Rights, June 2017.

force of Law 4491/2017 **on the legal gender recognition, the judicial procedure still remains the main obstacle**, rendering the enjoyment of the right null and void. **Of particular importance** is the adoption of Law 5089/2024 which established **civil marriage for same-sex couples**, and **removed the condition celibacy** in cases where legislation on legal gender identity recognition applies.

The GNCHR has repeatedly addressed Recommendations to the State, to review the current legislative framework in line with the standards of Council of Europe [Resolution 2048 \(2015\)](#), *Discrimination against transgender people in Europe*,<sup>233</sup> and to **promote the establishment of accelerated, transparent and accessible gender reassignment procedures, based on the principle of self-determination and self-identification**, accessible to anyone regardless of age, medical condition, financial status or criminal record, and remove any restrictions. Furthermore, **the procedures should be administrative and extra-judicial**. This is exactly what should apply in the case of transgender and non-binary persons, in accordance with the case law of the ECtHR.<sup>234</sup> Most of all, this is an ongoing and rightful demand of the LGBTQI+ community.<sup>235</sup>

In particular, with regard to intersex people, it is important to stress here that both interviews with relevant experts and members of the intersex community, as well as data from the European Union Agency for Fundamental Rights (FRA, 2020), demonstrate that intersex people are very often victims of discrimination in Greece.<sup>236</sup>

The GNCHR takes this opportunity to underline that Greece must immediately comply with the World Health Organisation guidelines, in order to transpose the modern concept of sexual health and gender identity in the relevant national legislative framework.<sup>237</sup> More specifically, the term **gender identity disorder should be removed from the list of "Mental and behavioural disorders"**. In this context, the terms "*intersexualism*" and "*gender identity disorder in children*" should be replaced by the terms "*gender incongruence in adolescence and adulthood*" and "*gender incongruence in childhood*" respectively.<sup>238</sup>

Overall, despite valuable positive steps taken towards gender identity and sexual orientation, including the National Strategy for LGBTQI+ Equality in Greece,<sup>239</sup> as detailed

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<sup>233</sup> [Council of Europe Resolution 2048 \(2015\)](#), *Discrimination against transgender people in Europe*

<sup>234</sup> [Memorandum](#) of the Greek National Commission for Human Rights (GNCHR) to the Committee set up by the Prime Minister for the drafting of the National Strategy for Equality of LGBTQI+ persons, 30 June 2021, pages, [A short guide to legal gender recognition](#) *Schlumpf v. Switzerland*, [appl. No 29002/06] 5 June 2009.

<sup>235</sup> [Greek Transgender Support Association \(SYD\)](#), Input to the GNCHR Report, February 2023.

<sup>236</sup> [ECRI report on Greece](#) (sixth monitoring cycle), 22 September 2022, page 13.

<sup>237</sup> [Greek Transgender Support Association \(SYD\)](#), Input to the GNCHR Report, February 2023. See also World Health Organization, [Gender incongruence and transgender health in the ICD](#).

<sup>238</sup> See World Health Organisation, [Gender incongruence and transgender health in the ICD](#). According to the 11th Revision of the International Statistical Classification of Diseases and Related Health problems (ICD-11), the revised ICD-11 codes include new changes reflecting a modern concept of sexual health and gender identity.

<sup>239</sup> See [Memorandum](#) of the National Commission for Human Rights (GNCHR) to the Committee set up by the Prime Minister for the drafting of the National Strategy for the Equality of LGBTQI+ persons, 30 June 2021

above, the GNCHR considers it necessary to reiterate the urgent **need for the full and effective enshrinement of the human rights of LGBTQI+ persons.**

In view of the above, the GNCHR proceeds to the following *Recommendations*:

***1. With regard to transgender persons, the GNCHR reiterates all its previous Recommendations with regard to the full access to health care services and gender transitioning surgeries, to the extent that these are freely optional, as well as the need for their insurance coverage, calling on the competent bodies to take urgent measures to ensure equal access of transgender/ gender diverse persons to health care while respecting their gender expression and gender identity, and in particular to:***

***i) comply with the decisions of the World Health Organisation, incorporating the new ICD-11, in line with modern developments in fully de-psychiatricising transgender identities***

***ii) to legislate in the full access of transgender/gender-diverse persons according to their gender expression and identity to health care services pursuant to the provisions of Law 4491/2017, as well as the legal gender recognition in examinations/prescriptions/hospitalisations that are "gendered" in nature***

***iii) amend the Code of Medical Ethics so as gender expression and identity along with gender characteristics are included in the provision against discrimination***

***iv) appoint, at Regional level, contact persons with an advisory/informative role in General Hospitals, acting as 'advocates' for LGBTQI+ persons seeking medical services***

***v) ensure full insurance coverage of all gender reassignment procedures.***

***ii) Foster care and adoption***

The GNCHR confirms the existence of another important legislative gap that has been a constant concern for **LGBTQ+ couples who have entered into a civil partnership in Greece, which is characterized by the complete lack of any recognition of parenthood over children acquired during its duration.** However, on the occasion of its opinion on Law 4538/2018 "[Measures for the promotion of the Institutions of Fostering and Adoption and other provisions](#)",<sup>240</sup> submitted in May 2018, the GNCHR did not fail to express its satisfaction with the provision of the opportunity to acquire the status of a foster parent for the parties in the partnership pact. This provision was introduced to partially address—but not cover—the absence of a relevant regulation in Law 4356/2015 regarding civil partnerships, thereby broadening the eligibility criteria for foster parents and extending the possibility of fostering to couples who have already entered into a Civil Partnership. At the

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<sup>240</sup> [Observations](#) by the GNCHR on the Bill of the Ministry of Labour, Social Security and Social Solidarity "Measures for the promotion of the Institutions of Fostering and Adoption and other provisions", May 2018, pages 9-10.



time, the Greek National Commission for Human Rights (GNCHR) had encouraged the legislator to take a further step by allowing both joint adoption and the possibility for a person who is in a civil partnership to adopt the child of their partner, provided there is no second legal parent, in order to uphold the principle of two legal parents. while the other remains legally alienated, even after many years of cohabitation. The Commission had pointed out that this specific regulation should be gender-neutral, since in practice many children are already being raised by families with same-sex parents — most commonly women — where only one of them (usually the biological mother) has a legal bond with the child, while no legal bond is established with the other one, even after many years of partnership. The GNCHR proposes that the competent state authorities explicitly provide for the possibility of legal recognition of the parental role of the non-biological parent, whether or not there is a civil partnership between the two adult parties at the period in question. In June 2021, the GNCHR reiterated its positions in its [Memorandum](#) on the Drafting of the National Strategy for LGBTQI+ Persons Equality.<sup>241</sup>

It is recalled that during the adoption of Law 4356/2015 on the civil partnership, the Ombudsman had proposed the recognition of the right to custody for the second, non-biological parent of children of same-sex couples under the civil partnership. This provision was also rejected by the legislator. The main problem that arose in practice was that children acquired during a civil partnership between women born of one party to a civil partnership are not registered in the joint family register and are not subject to co-decision as to the name. That situation can only be remedied by **recognising the possibility of joint adoption for couples who have entered into a civil partnership**. Unfortunately, the gap remained and despite the adoption of Law 4491/2017 on the *Legal Gender Recognition* and the adoption of Law 5089/2024 on *Equality in Civil Marriage and Amendment to Other Provisions of the Civil Code*.

As pointed out by the GNCHR in its Observations on the *Bill on Equality in Civil Marriage*, submitted in February 2023, although the recognition of rights to family ties that have been contracted or recognised abroad may contribute to the recovery of registry irregularities, at the same time, it creates a two-tier system regarding the scope of recognised rights, with clearly more unfavourable treatment of LGBTQ+ individuals living in Greece compared to those residing abroad, for whom more ways of establishing kinship are effectively recognised.

In addition, it is worth emphasizing that the GNCHR intervened in support of preserving the provisions of Law 5089/2024 on *Equality in Civil Marriage*, following an annulment application submitted by associations.<sup>242</sup> The Court rejected the annulment application,

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<sup>241</sup> [Memorandum](#) submitted by the GNCHR, to the Committee was set up by the Prime Minister responsible for the drafting of the National Equality Strategy of LGBTQI + persons, 30 June 2021, page 11.

<sup>242</sup> [Announcement](#) by the President of the Council of State regarding the outcome of the Conference on a case, which was discussed on 11 April 2025 in the Plenary and concerns the constitutionality of provisions of Law 5089/2024 “*Equality in civil marriage, amendment of the Civil Code [and] other provisions*” (A’ 27), See also



ruling by majority that the relevant provisions are not contrary to the constitutional provisions on the protection of marriage, family, motherhood and childhood (Article 21(1)) or on equality (Article 4(1)).



In the light of the above the GNCHR addresses the following recommendations to the Greek State:

- 1. The GNCHR calls on the State to establish the rights of custody for the second, non-biological parent of children of same-sex couples under a civil partnership or in a marriage, whereas children born during the civil partnership or marriage between women, from one of the partners, shall be registered in the joint family register. At the same time, the right of voluntary recognition of children by a notary should be extended to children born out of wedlock.***
- 2. The Greek National Commission for Human Rights (GNCHR) recommends, in the best interests of the child, that the non-biological parent be granted the possibility of legal recognition of their parental role, regardless of the existence or absence of any form of cohabiting relationship between the two adult parties at the period in question.***
- 3. The GNCHR recommends the elimination of all forms of discrimination in matters relating to foster care, adoption and/or assisted reproduction on the basis of gender, sexual orientation and gender identity of prospective parents.***

### iii) Roma women and girls

The GNCHR reiterates **its concerns regarding early marriages in Greece**,<sup>243</sup> which in practice are mostly observed **in Roma communities**.<sup>244</sup> Child marriage practices are usually associated with a number of risk factors such as school drop-out, exposure to unprotected physical contact, low access to prenatal check-ups, HIV infection and other sexually transmitted diseases, miscarriages as well as various other pregnancy complications, high child mortality rate, stress, mental illness, etc. The Panhellenic Confederation of Greek Roma ELLAN PASSE, in its Memorandum of 12.10.2020 to the GNCHR, had underlined its particular concern about Roma women who often drop out school to enter into an early marriage or due to pregnancy, and the need to give them the **opportunity to attend second chance schools** along with their children. The *UN CRC Committee*, in the *Concluding Observations on the Seventh Periodic Report of Greece* has expressed its concern about the consequences of early marriages, on the physical and mental health and well-being of girls, phenomena particularly encountered in Roma communities and in the Muslim minority in Thrace.<sup>245</sup>

According to Article 1350 of the Civil Code, marriages between spouses under the legal age are only allowed for important reasons after a court decision. On the basis of data from the Hellenic Statistical Authority,<sup>246</sup> in the period 2001-2019, 831 marriages between children under 15 years of age (girls: 784, boys: 47), and 35,139 marriages between 15 and 19 years of age (girls: 29,531, boys: 5,608) were recorded. The GNCHR considers it absolutely necessary to collect qualitative and quantitative data on the issue and to systematically monitor the situation. Furthermore, supportive measures, such as awareness-raising activities for the empowerment of girls in Roma communities, family planning services and information activities on contraception, reproductive health care and the risks of infant mortality, should be implemented immediately and on a regular basis to start eliminating such phenomena.

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<sup>243</sup> [GNCHR Observations](#) on the Elaboration of the Third Report of the Hellenic Republic on the implementation of the International Covenant on Civil and political Rights (CCPR), 14 March 2023, page 17, [GNCHR Observations](#) on the combined 23th and 24th periodic Report of Greece to the Committee on the Elimination of racial discrimination (CERD), July 2021, page 2, [GNCHR Submission](#) to the United Nations Human Rights Committee on the List of Issues Prior to Reporting for the Third periodic examination of Greece under the International Covenant on Civil and Political Rights (CCPR), September 2021, page 11.

<sup>244</sup> According to the Civil Code, the legal age for marriage is 18 years for both sexes, but courts can allow a minor to enter into marriage if it is deemed necessary for a significant reason" (Civil Code, page 1350). Under Sharia Law, a person can get married once he reaches adolescence (Cavusoglu, 2015).

<sup>245</sup> See [CRC/C/GRC/CO/4-6: Concluding observations](#) on the combined fourth to sixth Periodic Report of Greece, 28 June 2022, paragraph 28.

<sup>246</sup> Hellenic Statistical Authority, [Marriages](#).



In view of the situation experienced by Roma women, the GNCHR, addresses the following **Recommendations** to the Greek State:

- 1. The GNCHR urgently calls on the State to publish data and information collected in particular regarding Roma Women, victims of multiple discrimination and social exclusion with emphasis on: a) the high school drop-out rate b) early and forced marriages and c) the situation of Roma women and especially girls in the family and community, their disadvantaged position and the strict hierarchy.**
- 2. The GNCHR proposes the implementation and promotion of measures aimed at equal access to education and schooling, equal employment opportunities, family planning for Roma women and girls, informing about the value of screening tests such as mammography and "pap test", about contraception, access to free childcare services, informing - raising awareness about domestic violence and the rights of victims, and their access to justice.**

#### **iv) Women with disabilities**

The GNCHR highlights that, as regards women and girls with disabilities, so far, there are no applicable measures ensuring access to sexual and reproductive health services. Although the [2020-2023 National Action Plan on the Rights of persons with Disabilities](#) provided for action on access to sexual and reproductive health services for persons with disabilities, this has not yet been implemented.<sup>247</sup> Furthermore, it is worth noting that the [2020-2023 National Action Plan for the Rights of Persons with Disabilities](#) included an action aimed at conducting seminars on the sexual and reproductive rights of women and girls with disabilities, however, the target group of these seminars was the parents and guardians of

<sup>247</sup> National Confederation of Persons with Disabilities, - ESAmA, Input to the GNCHR report, February 2024.

girls with disabilities and not the girls or women with disabilities themselves, thereby compromising the achievement of the intended outcome.<sup>248</sup>

Another particularly serious issue faced by women with disabilities, in addition to access to sexual and reproductive health services, is the **failure to safeguard their right to participate in the institution of adoption, foster care, and professional foster care**. According to Article 23(2) of the Convention on the Rights of Persons with Disabilities, *"States Parties shall ensure the rights and responsibilities of persons with disabilities, with regard to guardianship, wardship, trusteeship, adoption of children or similar institutions, where these concepts exist in national legislation; in all cases the best interests of the child shall be paramount. States Parties shall render appropriate assistance to persons with disabilities in the performance of their child-rearing responsibilities"*, which means that in the development of the institutional framework for disability and foster care - according to a rights-based approach to disability - the best interests of the child to be adopted or fostered - with or without a disability - must be emphasised and prioritised, and in parallel, the right of persons with disabilities to adoption or foster care must be safeguarded, providing them with appropriate support measures. Unfortunately, despite the above provisions, according to Article 8(2) of Law 4538/2018 *"Measures for the promotion of the institutions of Foster Care and Adoption and other provisions"* both **foster parents and their cohabitants must have good emotional, mental and physical health**, thus violating the Convention on the Rights of persons with Disabilities. The wording of the law *"good physical, emotional and mental health"* does grant people with a disability and/or chronic disease the possibility to take on the role of a foster carer (professional or not), such as a wheelchair user, a blind, deaf, hard of hearing person, or a person with diabetes mellitus, etc.<sup>249</sup>

In the light of the foregoing, the GNCHR, addresses the following **Recommendations** to the Greek State:

- 1. The GNCHR calls on the State to ensure access of women with disabilities to sexual and reproductive health services.**
- 2. The GNCHR recommends the amendment of Law 4538/2018 "Measures for the promotion of the institutions of Foster Care and Adoption and other provisions", to grant women with disabilities and/or chronic diseases the possibility to participate in the institution of adoption and foster care, in accordance with the Convention on the Rights of Persons with Disabilities.**

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<sup>248</sup> Disability Issues Observatory of the National Confederation of People with Disabilities(2022). "Women with disabilities". Letter to the Ministry of Labour and Social Affairs within the framework of Work Package 9 of the Disability Issues Observatory of the National Confederation of People with Disabilities, entitled: *" Providing support to the individual focal points (Ministries and Regions) on the proper application of the requirements set out in the Convention and the Commission's Concluding Observations at Central and Regional level"*.

<sup>249</sup> See People with disabilities (2022). 'Draft of the Common Ministerial Decision on the professional foster care: the answer of ESAmEA. Letter to the Deputy Minister of Labour and Social Affairs.

## G. Violence against Women and domestic violence

According to the GNCHR “...violence against women, including domestic violence, is a brutal violation of fundamental human rights, and is not limited to a particular political or economic system, but is widespread in every society. There is no distinction in terms of wealth, race or culture. The power structures within society that perpetuate violence against women are deeply rooted and entrenched. Violence, in the form of an experience or a threat, prevents women around the world from exercising and fully enjoying their rights... Effectively addressing the highly acute social phenomenon of domestic violence, both in legal terms and in practice, has been a long-standing demand of institutions and experts involved in the protection of human rights, and in particular in the support of victims of domestic violence.”<sup>250</sup>

The following data of the Hellenic Police on violence against women, and especially domestic violence, illustrate the **alarming and constantly increasing dimensions of the problem** over a period of ten years:<sup>251</sup>

### Violence against women

Years	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2024</u>
Annual number of women victims of domestic violence	1630	1818	2302	2321	2696	3196	3815	4171	4264	7375	10131	
Annual number of reported domestic violence crimes	2455	2896	3512	3572	3839	3134	4722	5221	5669	8776	11534	
Annual number of male perpetrators of domestic violence	1620	1886	2351	2428	2891	2395	4202	4619	4436	7571	10166	
Annual number of victims of	–	–	–	–	–	–	–	–	3609	6166	7430	

<sup>250</sup> GNCHR Observations - Decision on the Bill “Response to domestic violence”, Annual Report 2005, page 231 ff.

<sup>251</sup> Hellenic Police, [2022 Annual Report of the Project of Domestic Violence Response](#) (November 2023), page 100 ff.



<i>physical violence (physical harm and illegal violence)</i>												
<i>Annual number of victims of psychological violence (threat)</i>	–	–	–	–	–	–	–	–	2906	6057	7754	
<i>Annual number of victims of sexual violence (sexual assault)</i>	–	–	–	–	–	–	–	–	69	147	542	
<i>Annual number of victims of economic violence (data not available)</i>	–	–	–	–	–	–	–	–	–	–	1626	
<i>Annual number of female victims reporting rape</i>	234	222	194	183	217	223	142	148	126	226	303	

Similar concerns arise from EIGE's published data for 2024.<sup>252</sup> In more detail:

***Percentage of women victims of violence, EIGE 2024***

Country	Percentage of women who experienced physical-sexual violence from any perpetrator	Percentage of women who experienced physical-sexual violence in the last year	Women-victims of femicide by a partner or intimate partner
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<sup>252</sup> EIGE, [Violence indicators in Greece, 2024](#)





Greece	37%	4%	0.41%
EU	31%	3%	—

The GNCHR has also expressed its concern about the data collected by the General Secretariat for Equality and Human Rights on the SOS 15900 helpline, according to which a total of 10,324 calls were recorded from 01.11.2021 to 30.09.2022, out of which 6,969 were related to “incidents of violence”, from 01.11.2022 to 30.09.2023, a total of 8,133 calls were recorded, out of which 5,462 concerned “incidents of violence” and 1,533 concerned “useful information”.<sup>253</sup> In addition, between January - March 2024, a total of 2,012 calls were recorded, of which 1,337 (66%) concerned “incidents of violence” and 406 (20%) “useful information”.<sup>254</sup> Of the total calls recorded by the SOS Line 15900 relating to incidents of violence, 1,020 (76%) involved women who have experienced violence and 317 (24%) concerned individuals who reported suspected or real incidents of violence. At the same time, the Commission shares the concerns of the *UN Working Group on discrimination against women* about the non-prosecution of perpetrators, despite the significant number of recorded incidents of domestic violence in the country,<sup>255</sup> a fact highlighted also by the CEDAW Committee in its Concluding Observations on Greece in 2024.<sup>256</sup>

Indeed, since 2015, the GNCHR had underlined the need for the Greek State to ratify the Istanbul Convention on Preventing and Combating Violence Against Women and Domestic Violence, which was signed as early as May 2011 and entered into force in 2014.<sup>257</sup>

In March 2018, in its Observations on the Bill for the ratification of the Council of Europe Convention on *Preventing and Combating Violence against Women and Domestic Violence*, the GNCHR welcomed the late ratification of the Convention by the Greek State with the adoption of **Law 4531/2018, which is the first legally binding text that provides a comprehensive framework for the prevention, protection and prosecution of violence**

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<sup>253</sup> See [4th Annual Report on violence against Women](#), General Secretariat for Equality and Human Rights, November 2023, page 156 and [3rd Annual Report on violence against Women](#), General Secretariat for Family Policy and Gender Equality, November 2022, page 149.

<sup>254</sup> [Quarterly Newsletter 13: Policies and Actions of the General Directorate for the Prevention and Combating of Violence against Women Analysis of Statistical Data of the General Directorate for the Prevention and Combating of Violence against Women Network and the SOS Line 15900](#) January-March 2024, page 20 ff.

<sup>255</sup> [Report](#) of the *UN Working Group on discrimination against women and girls in legal, policy and institutional framework*, following its official visit to Greece from 1 to 12 April 2019, A/HRC/44/51/Add.1, 29 June 2020, paragraphs 58, 59. Experts are concerned that there is uneven coordination of support services for victims of different forms of gender-based violence, as well as of programmes for perpetrators.

<sup>256</sup> CEDAW/C/GRC/CO/8-9: Concluding Observations on the combined fourth to sixth periodic report of Greece, 19 February 2024, paragraph 23 (b).

<sup>257</sup> GNCHR, [Report “Transgender persons and legal recognition of gender identity”](#), September 2015, [GNCHR Annual Report 2015](#), page 87ff.

**against women.**<sup>258</sup> In this context, the GNCHR would remind that **domestic violence is a criminal offence** punishable by the provisions of Law 3500/2006 (as amended by Laws 3868/2010, 4531/2018, 4547/2018, 4610/2019), **in conjunction with the relevant provisions of the Penal Code** (Law 4619/2019). Following the ratification of the Istanbul Convention, two additional very important legislative measures harmonized with the Convention were adopted, namely, Law 4491/2017 on the legal gender recognition and the revision of the legal notion of rape on grounds of non-consent in the Penal Code (Article 336). As the GNCHR stresses in its comments on the ratifying Law <sup>259</sup>4531/2018, it complements and improves Law 3500/2006, without, however, managing to approach the prevention of violence, the prosecution of perpetrators and the protection of victims in a coordinated and effective manner.<sup>260</sup> The GNCHR also points out in its relevant Observations that the decision of the legislator to selectively adapt the legislation to certain provisions of the Convention is obscure, a conclusion that unfortunately remains valid to this day.

In particular, Law 4531/2018 criminalises domestic violence in terms of promoting victims' rights, forced marriage, sexual harassment and stalking, strengthens criminal provisions providing for the punishment of female genital mutilation, and ensures the upgrading of support services and the network of structures for abused women, as well as the reinforcement of information, awareness-raising and training actions under the Convention. There is a clear obligation of EU Member States as Contracting States to the Convention, to guarantee the **training of professionals dealing with victims of violence, including Judges and Prosecutors**. The obligation to implement therapeutic programmes for perpetrators of domestic violence is also of particular importance. An important and **significant innovation is the provision for the establishment of the Council of Europe's Group of Experts on Action against Violence against Women and Domestic Violence (hereafter GREVIO)**, composed of experts in the field and mandated to monitor the implementation of the Convention by the Member States that have signed it, which published its first [Evaluation Report for Greece](#) in November 2023.<sup>261</sup>

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<sup>258</sup> The President of the GNCHR, Maria Gavouneli, participated in the session of the Special Standing Parliamentary Committee on Equality, Youth and Human Rights on "Update on the monitoring of the implementation of the Istanbul Convention", 22 October 2019. See also [GNCHR Observations](#) on the Bill on the "Ratification of the Council of Europe Convention on Preventing and Combating Violence Against Women and Domestic Violence and adaptation of Greek legislation, 1 March 2018.

<sup>259</sup> [GNCHR Observations](#) on the Bill on the "Ratification of the Council of Europe Convention on Preventing and Combating Violence Against Women and Domestic Violence and adaptation of Greek legislation, 1 March 2018.

<sup>260</sup> Law 3500/2006 has been strongly criticized as an inadequate and ineffective tool, leading to legal uncertainty and difficulties in implementation, especially as regards the non-inclusion of all forms of violence, and the definition of rape based on violence rather than the absence of consent.

<sup>261</sup> [Baseline Evaluation Report on Greece](#) by the Council of Europe Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO), 14 November 2023.



At legislative level, the GNCHR, closely monitoring the developments following the ratification of the Istanbul Convention, observes that they are in the right direction, albeit in a fragmented manner. Among the positive elements is Law 5172/2025 which, in Part A (*Additional provisions to the Law on Domestic Violence*), transposes EU Directive 2024/1385/EU on combating violence against women and domestic violence. Specifically:

- i)** Article 4 (Definitions, Article 2 of Directive 2024/1385) refines the term “partner,” defining it as a person in a stable personal relationship, irrespective of cohabitation;
- ii)** Article 5 (Female Genital Mutilation – Amendment of Article 315 of the Criminal Code, Article 3 of Directive 2024/1385) broadens the objective elements of the offence by amending Article 315 of the Criminal Code;
- iii)** Article 6 (Unlawful Violence – Forced Marriage – Addition of paragraph 3 to Article 330 of the Criminal Code, Article 4 of Directive 2024/1385) criminalizes forced marriage as a distinct offence by amending Article 330 of the Criminal Code;
- iv)** Articles 7 to 9 introduce new forms of sexual exploitation offences against women, children and vulnerable persons committed online, such as cyberstalking, cyber harassment, and so-called “doxing,”<sup>262</sup> by amending Articles 333, 337 and 184 of the Criminal Code, respectively.

In terms of shortcomings, the law constitutes an incomplete transposition, as more than half of the provisions of the Directive are omitted, and without justification. These include provisions on the prevention of violence against women, on the specific support of victims in general and of those with additional vulnerabilities, on sexual harassment in the workplace, on the training of professionals, and a number of other mandatory provisions necessary to ensure the full alignment of national law with Union law. Furthermore, as regards the provisions on victim support and access to justice—an area that ranks among the most fundamental aspects of the protection of fundamental rights—the GNCHR stressed, both in the context of its participation in the meeting of the *Standing Committee on Public Administration, Public Order and Justice of the Hellenic Parliament* on Monday, 20 January

<sup>262</sup> Doxing means inciting an indefinite number of persons, through the disclosure of the victim’s personal information by means of technological and communication tools, with the aim of causing physical or psychological harm to the targeted person..

2025, concerning the examination of the draft law,<sup>263</sup> and in its relevant Memorandum submitted to Parliament,<sup>264</sup> that the provisions are not accompanied by strengthened measures of implementation and cooperation between the bodies of the judicial and social systems, so as to ensure the full protection of victims and the effective prevention of violence. It is of concern that, in practice, significant gaps and shortcomings remain in support structures of therapeutic programmes (such programmes are mainly implemented in Athens, Piraeus and Thessaloniki), while communication and coordination among all the competent services involved also remain problematic. On the occasion of the discussion about the draft law, the GNCHR reiterated the need for the Compensation Authority to publish detailed data on the number of applications for compensation and on the number of victims ultimately compensated (Article 15 *Inclusion of the obligation to cover immediate financial needs among the conditions of criminal mediation, Amendment of Article 11(2) of Law 3500/2006 (Article 24 of Directive 2024/1385)*). Finally, despite the GNCHR's Recommendation, as well as the Recommendations of the CEDAW Committee and GREVIO to Greece, the Commission regrets to note that the Law did not proceed with the criminalisation of femicide.

Another recent legislative development, which was warmly welcomed by the GNCHR, is the **strengthening of care for victims of domestic violence** with the adoption of Law 5090/2024 *Interventions in the Penal Code and the Code of Criminal Procedure to accelerate and improve the quality of criminal proceedings - Modernisation of the legislative framework for the prevention and fight against domestic violence*. More specifically, in Article 131(2)(a) (Care for victims of domestic violence) of Law 5090/2024, introducing a new provision 23A in Law 3500/2006,<sup>265</sup> **sexual orientation, gender identity or gender characteristics, among others, are added to the personal characteristics of the victim during his/her individual assessment**, aiming as well at managing the risk of recurrence of violence and secondary victimisation. The provision in question appears to **take into account the additional vulnerability of LGBTQI+ persons**, recognizing that they are often targeted as victims of domestic violence, including in cases involving same-sex couples — a

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<sup>263</sup> The GNCHR in Parliament for the Law draft of the Ministry of Justice to address violence against women, January 20, 2025.

<sup>264</sup> GNCHR Memorandum on the Law on Domestic Violence "Addressing new forms of violence against women - Incorporation of Directive (EU) 2024/1385 - Additional regulations in the law on domestic violence - Reorganization of forensic services - Strengthening the operation of Eurojust - Measures for the protection of minors and the fight against crime in the Criminal Code and the Code of Criminal Procedure - Procedural provisions on the competence of ordinary administrative courts and other regulations", January 2025.

<sup>265</sup> Article 131 of the Bill "Interventions in the Penal Code and the Code of Criminal Procedure to accelerate and improve the quality of criminal proceedings - Modernisation of the legislative framework for the prevention and fight against domestic violence": Care for victims of domestic violence - Insertion of Article 23A to Law. 3500/ 2006.

development that constitutes yet another step toward acknowledging gender-based violence related to LGBTQI+ persons.<sup>266</sup>

A further improvement in the legislation constitutes the implementation of the provision of **Article 28 of the Istanbul Convention** (Reporting obligation of domestic violence crimes by professionals)<sup>267</sup> following the adoption of the provision of Article 130 (Obligations of professionals - Replacement of Article 23 of Law 3500/2006) of Law 5090/2024, according to which **certain professionals have the obligation to report serious acts of violence to the competent organisations or authorities**. In particular, Article 130 provides for a specific obligation for professionals who become aware of incidents of domestic violence against minors in the performance of their duties, to report a *crime of domestic violence* to the prosecuting authorities. By encouraging professionals to report incidents of domestic violence that come to their attention, taking into account the clause providing for the immunity from prosecution for malicious complaints, reports and disciplinary proceedings against them, it is expected that **the protection of victims will be enhanced**. This is an arrangement that complies with GREVIO *Recommendation 248* to our country,<sup>268</sup> according to which the Council of Europe Experts encourage national authorities to reconsider the obligation for professionals to report cases of violence against women and their children, referring to **prior consent of adult victims, as opposed to the obligation to report when the victim is a child or unable to protect himself/herself on grounds of a disability**. This arrangement is also in line with the [UN CRC No. 13 \(2011\)](#), *The right of the child to freedom from all forms of violence*,<sup>269</sup> where the Committee recommends the establishment of reporting mechanisms and accessible support mechanisms for children, their representatives and others, to ensure violence against children is reported, and on the condition that where there is a suspicion or risk of violence, professionals should work directly with children.

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<sup>266</sup> [Public consultation of a legislative initiative of the Ministry of Justice](#), under the title: “Interventions in the Penal Code and the Code of Criminal Procedure to accelerate and improve the quality of criminal proceedings - Modernisation of the legislative framework for the prevention and fight against domestic violence.”, 28.11-28.12.2023

<sup>267</sup> Article 28 - Reporting obligation by professionals: *Parties shall take the necessary measures to ensure that the confidentiality rules imposed by internal law on certain professionals do not constitute an obstacle to the possibility, under appropriate conditions, of their reporting to the competent organisations or authorities if they have reasonable grounds to believe that a serious act of violence covered by the scope of this Convention, has been committed and further serious acts of violence are to be expected.*

<sup>268</sup> See paragraph 173 [Baseline Evaluation Report on Greece](#) by the Council of Europe Group of Experts on Action against Violence against Women and Domestic GREVIO): ‘...To this end, GREVIO also encourages the Greek authorities to review the obligation for professionals to report cases of violence against women and their children, other than in situations in which there are reasonable grounds to believe that a serious act of violence covered by the scope of the Istanbul Convention has been committed and further serious acts are to be expected. This may require making the obligation to report contingent upon the prior consent of the victim, unless the victim is a child or is unable to protect her/himself due to disability.’ 14 November 2023, pages 45-49.

<sup>269</sup> [General Comment of the UN CRC No. 13 \(2011\)](#) *The right of the child to freedom from all forms of violence*, 18 April 2011, paragraphs 49- 50.



It should be noted, that Law 5090/2024 introduces new stand-alone offences in the Penal Code, which now constitute acts of domestic violence, when committed against a family member or when committed in front of minors, namely rape (Article 336 PC) and abuse of a person incapable of resisting a sexual act (Article 338 PC), which are added to the offences of intentional homicide (Article 299 PC), of causing lethal injury (Article 311 PC), which were however already provided for in Law 3500/2006. Moreover, under Articles 120, 121 and 122,<sup>270</sup> amending Articles 6, 7 and 9 of Law 3500/2006 respectively, the penalties for perpetrators of domestic bodily injury, domestic unlawful violence and threats and domestic indecent assault when committed in front of minors, are getting more severe. Serious concern is raised by Article 118 amending Article 4 of Law 3500/2006 (Physical and psychological violence against minors), which adds psychological violence, in addition to physical violence, against minors in the context of their upbringing. Psychological violence against minors, as violence entailing the consequences of the misuse of parental responsibility under Article 1532 of the Civil Code, i.e. restriction or termination of the parental responsibility of the abusive parent, despite the fact that it is, *inter alia*, in the same spirit as the provision of Article 312 of the Criminal Code (Bodily injury to weak persons),<sup>271</sup> where there is an explicit reference, separated by 'or', to physical pain or physical exhaustion dangerous for health or mental suffering that could result in serious mental harm, raises concern about the possible indirect criminalization of parental alienation, as it is clear that a legislative provision of this nature considerably complicates the objective imputation of liability in practice." The GNCHR considers that the wording is rather vague and lacking in clarity, leading to legal uncertainty.

Finally, as regards the monitoring and treatment of domestic violence, it should be noted, that the GNCHR welcomed from the outset the supervisory role of the General Secretariat for Gender Equality (now General Secretariat for Equality and Human Rights), which together with the Research Centre for Gender Equality (K.E.th.I.), the official units of the Ministries and the Ombudsman (Equal Treatment Area), constitute the national mechanism for gender equality.<sup>272</sup> Further, in order to highlight and combat this phenomenon, the data collection and research process conducted by the Equality Observatory, in line with Article 11 - Data Collection and Research of the Istanbul Convention, under which the collection and publication of statistical data on all forms of

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<sup>270</sup> **Article 120:** Distinct case of domestic bodily injury also committed in front of a minor - Amendment of Article 6 of Law 3500/2006, **Article 121:** Domestic unlawful violence and threats in front of a minor too - Amendment of Article 7 of Law 3500/2006, **Article 122:** Increase of the penalty limit for committing domestic offences of indecent assault in front of a minor - Amendment of Article 9 of Law 3500/2006.

<sup>271</sup> The term "mental health" was inserted to Article 312 of the Criminal Code by Article 8 of Law 4322/2015 "Reform of criminal provisions, abolition of C-type detention centres and other provisions", which was further specified in order to highlight the term's criminal dimension by Law "Ratification of the Criminal Code".

<sup>272</sup> See Article 4(1) of Law 4604/2019 - Central, regional and local mechanisms and bodies in charge of achieving substantive gender equality.



violence covered by the Convention <sup>273</sup> is coordinated and implemented on the basis of a Memorandum of Understanding signed in April 2021 between the General Secretariat for Equality and Human Rights and the Hellenic Statistical Authority (ELSTAT), in order to ensure the proper implementation of the Convention.<sup>274</sup> However, as stated in the GNCHR *Observations on the 2023 State's Report* there is still a lack of specific, reliable and comparable statistical data on all forms of violence against women and, most importantly, the officially available data are not classified by degree of vulnerability.<sup>275</sup>

Considering the crucial importance of the Istanbul Convention and the acknowledged urgent need to address the phenomenon of violence against women and domestic violence, particularly with regard to the protection of vulnerable groups of women, the GNCHR underlines that it has been closely monitoring the implementation of the Istanbul Convention ever since its ratification, and that it remains committed to continuously monitoring the legislative process, addressing the issue of discrimination against women through a cross-sectoral approach. Taking into account the [2023 GREVIO Baseline Evaluation Report](#) for Greece, as well as the *CEDAW Recommendations* in the text of its Concluding Observations on Greece in 2024, the National Commission calls on the Greek State to comply immediately with the following:

***1. The GNCHR calls on the competent authorities to plan and implement in a highly coordinated and consistent manner the following:***

***(i) clear and targeted Actions to prevent and combat violence against women and domestic violence and to protect victims of all forms of violence covered by the scope of the Istanbul Convention, regardless of criminal prosecution***

***(ii) administrative practices on providing individualised support to victims of all forms of violence covered by the scope of the Istanbul Convention***

***(iii) actions and measures at national, regional and local level involving all relevant stakeholders (institutions, services and organisations), as well as non-governmental organisations and civil society, such as recruitment or secondment of social workers and psychologists to police stations throughout the country, specialised in the management of cases of sexual violence against women***

***(iv) support measures for the country's health services aimed at dealing with incidents of violence against women. As regards rape in particular, an immediate operation of***

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<sup>273</sup> See Article 10 - Ministry-level actions aimed at integrating the principle of gender equality and the gender dimension in public policies of Law 4604/2019 on substantive gender equality. In practice, the Department of Documentation, Research and Digital Support (Observatory) of the General Secretariat for Equality and Human Rights (GGIAD) is tasked with the duties of the Observatory.

<sup>274</sup> [Memorandum of understanding](#) between the General Secretary of Family Policy and Gender Equality (GGOPIF) and the Hellenic Statistical Authority (ELSTAT)

<sup>275</sup> [Observations of the GNCHR on State's draft reply to the list of issues prior to the submission of the combined Eighth and Ninth Periodic Report under the Convention on the Elimination of Discrimination against Women \(CEDAW\)](#), 9 April 2023, page 5.

*forensic services in all prefectures of the country is required, in addition to the immediate recruitment and appropriate training of nursing and medical staff in all healthcare structures of the country for the management of rape cases. Moreover, "rape kit" type technologies should also be utilised in all public hospitals and health centres for the facilitation of the victims.*<sup>276</sup>

*(v) information actions for health professionals and frontline police officers to ensure the rights of victims when using these services and their non-discriminatory treatment and effective protection*

*(vi) practices for the systematic collection of reliable and comparable statistic data on all forms of discrimination prohibited by law, as required by the Istanbul Convention.*<sup>277</sup>

*2. The GNCHR encourages the relevant State authorities to comply with the recommendations of the European Strategy for Gender Equality,<sup>278</sup> and to proceed to the complete mapping of gender inequalities, including gender-based violence, by data analysis based on cross-sectoral perspectives and indicators, such as age, disability status, migrant status, rural or urban residence, etc.*

*3. Bearing in mind that the Istanbul Convention stipulates that all its provisions shall be guaranteed without discrimination on any ground such as sex, gender, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth, sexual orientation, gender identity, age, state of health, disability, marital status, migrant or refugee status, or any other status, the GNCHR calls on the competent authorities to adopt specific, additional and proportionate measures to protect the rights of vulnerable groups of women and girls, such as migrant, refugee and asylum-seeking women, women and girls with disabilities and/or chronic diseases, Roma women, as well as LGBT women, who are at risk of*

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<sup>276</sup> See relevant press reports:

- What you will face in case you are raped in Greece in 2021. *Where 32% of people would "justify" a rape*, Marilella Antonopoulou, 12.2.2021

<https://www.ladylike.gr/women-today/osa-tha-antimetopiseis-an-viasteis-stin-ellada-tou-2021-edo-pou-to-32-ton-anthropon-tha-dikaiologouse-enan-viasmo/>

- *The steps a woman can take after being raped*, Christina Galanopoulou, 9.3.2019

<https://www.lifo.gr/now/greece/poia-einai-ta-bimata-poy-mia-gynaika-mporei-na-akoloythisei-meta-ton-biasmo>

- *In 2021, in Greece, a woman raped on Friday will be examined by a coroner on Monday*, News 24/7, Maria Kauki, 24 January 2021.

See also [2020 ANNUAL REPORT](#), Hellenic Police Headquarters, Order Branch, Directorate of General Policing, Department of Domestic Violence, Domestic Violence Services.

<sup>277</sup> Article 11 of Law 4531/ 2018. The GNCHR welcomes the monitoring role of the General Secretariat for Family Policy and Gender Equality (GGDOPIF) as well as the data collection and research carried out by its Observatory.

<sup>278</sup> [Communication](#) from the Commission to the European Parliament, the Council, The European Economic and Social Committee and the Committee and the Committee of the Regions, A Gender Equality Strategy 2020-2025 (COM(2020) 152) final, 5 March 2020, pages 5-6.

*multiple discrimination and thus even more exposed to violence, taking into account the diversity of categories and the risks of multiple discrimination.*<sup>279</sup>

**4. The GNCHR calls on the State to align with Recommendations Nos. 56 and 287 of the GREVIO Group Experts and to immediately take the necessary legislative measures to implement the provisions on emergency barring Orders (Article 52) and restraining or protection Orders (Article 53) of the Istanbul Convention, ensuring:**

***i) the availability of emergency barring or restraining Orders to all women victims of domestic violence***

***ii) the availability of and accessibility to the restraining orders to victims of all forms of violence against women covered by the Convention***

***iii) the strengthening of monitoring and enforcement of restraining orders, through various technical means, such as electronic monitoring.***

***(iv) the successful implementation in practice of effective, proportionate and dissuasive criminal or other legal sanctions for non-compliance with restriction orders and***

***v) the collection of data on the number of restraining orders (following criminal and civil proceedings), the number of cases of non-compliance and legal sanctions imposed in response to non-compliance.***

**5. The GNCHR calls on the Greek State to establish and implement codes of ethics and conduct in all areas of public life where serious threats to women, girls and vulnerable people such as Roma, LGBTI persons, aliens and people with disabilities are identified.**

**6. The GNCHR calls on the Greek State to include in the Bills on Gender Equality, and with a view the implementation of actions aligned with the Istanbul Convention, an explicit provision for the cooperation with civil society organisations with proven experience in supporting victims of sexual harassment and violence and in implementing actions to prevent and address gender-based violence, under the provisions of the Istanbul Convention. The good practices of the organisations could serve as good examples and could be used in the context of exchange of experience and know-how.**

***i) Awareness-raising and education initiatives by the GNCHR on prevention and protection against domestic violence and violence against women***

**Of great importance, is also the fact that Law 4531/2018 provides for a State obligation to establish awareness-raising and education initiatives (Article 13 - Awareness raising and Article 14 – Education). The GNCHR welcomed these provisions and expressed its satisfaction with the fact that actions, such as the introduction of educational**

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<sup>279</sup> See also European Parliament [Resolution](#) of 15 February 2023 on the proposal for a Council decision on the conclusion, by the European Union, of the Council of Europe Convention on preventing and combating violence against women and domestic violence (COM(2016)0109 – 2016/0062R(NLE)).

material to school focusing on the elimination of gender stereotypes as well as targeted information campaigns, were provided for in the 2021-2025 Greek National Gender Equality Action Plan,<sup>280</sup> a proposal already included in the GNCHR contribution to the **preparation of the 2021-2025 ESDIF**.<sup>281</sup> A further step in this direction is the preparation of the National Action Plan of Greece for Women, Peace and Security (ESDGEA) by the Ministry of Foreign Affairs,<sup>282</sup> in cooperation with all relevant Ministries and departments and of course the GNCHR, contributing to the plan, which includes, among other things, actions for the training of professionals aimed at eliminating gender stereotypes.<sup>283</sup>

Despite the developments, the NCHR notes, while monitoring the implementation of the Convention, that in practice these actions **are not carried out systematically but mainly in a fragmented manner**.<sup>284</sup> The GNCHR points out the need to systematically invest resources in the prevention of all forms of violence, with particular emphasis on the education of children and young people about the principles of gender equality, human rights and anti-discrimination, gender stereotypes and attitudes that cultivate the acceptance and tolerance of violence against women. In this light, the GNCHR reiterates its particular concern, on the occasion of *its Observations on the 2022-2027 Action Plan for the Protection of Children from Sexual Abuse and Exploitation* in November 2022, about the fact that in practice effective measures, such as the introduction of comprehensive and specialised educational material in schools on gender stereotyping<sup>285</sup> and appropriate training of professionals in this field, do not yet seem to have been put in place.<sup>286</sup>

Similar findings and recommendations can be found throughout the GREVIO Evaluation Report on Greece, at every point of which it is repeated with concern that, initial and in-service training courses on violence against women must be ensured for all categories of professionals involved, in accordance with the Istanbul Convention, and of course for

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<sup>280</sup> 2021- 2025 Greek National Gender Equality Action Plan

<sup>281</sup> *Observations of the GNCHR on the 2021-2025 Greek National Gender Equality Action Plan of the Hellenic Ministry of Labour and Social Affairs*, 27 September 2021

<sup>282</sup> National Action Plan for Women, Peace and Security under the relevant UN Security Council Resolution 1325/2000.

<sup>283</sup> *GNCHR Contribution to the National Action Plan for Women, Peace and Security 2019 – 2024*, under the relevant UN Security Council Resolution 1325/2000, March 2020. See also herein page...

<sup>284</sup> See GNCHR Annual Report 2018. Recently, similar recommendations were made by the GNCHR on the occasion of the outbreak of domestic violence during the pandemic. See also: The President of the Greek National Commission for Human Rights, Maria Gavouneli, participated in the meeting of the Special Standing Committee on Equality, Youth and Human Rights, on Tuesday, 22 October 2019, on: "[Information](#) on monitoring the implementation of the Council of Europe Convention on Preventing and Combating Violence Against Women and Domestic Violence (Istanbul Convention), [GNCHR Intervention](#) at the session of the *Special Standing Committee on Equality, Youth and Human Rights* on: "*Domestic violence in the COVID-19 pandemic era: Women organisations share their experience*" May 2020.

<sup>285</sup> See also herein page 27ff

<sup>286</sup> See also European Commission, European Network of legal experts in Gender Equality and Non-discrimination, Panagiota Petroglou, [Country report gender equality: Greece 2020 - How are EU rules transmitted into national law?](#)

students and school teachers.<sup>287</sup> Serious concern, however, appears to be raised within GREVIO's Group of Experts by the gender-based biases that, as it observes, continue to prevail within the judiciary, along with the lack of mandatory in-service training on issues related to gender-based violence, in accordance with the requirements of the Istanbul Convention, as it considers the proper awareness and specialized training of the judiciary to be of critical importance.<sup>288</sup> in accordance with the requirements of the Istanbul Convention, as it considers **the proper awareness and specialised training of the judiciary to be of critical importance.**



As for the educational role of the GNCHR in the field of human rights, which according to its founding law is inextricably linked to its mission, <sup>289</sup> it is worth mentioning that **the National Commission has been organising a large number of education programmes and training activities for professionals, with particular emphasis on domestic violence issues.** You can read below the relevant actions of the GNCHR:

- Participation of the President of the GNCHR in the session of the Special Standing Committee on Equality, Youth and Human Rights of the Hellenic Parliament on the: "Information about the monitoring of the implementation of the Council of Europe Convention on Preventing and Combating Violence Against Women and Domestic Violence (Istanbul Convention)", 22 October 2019.
- Intervention by the GNCHR in the session of the Special Standing Committee on Equality, Youth and Human Rights of the Hellenic Parliament on: "Domestic violence in the COVID-19 pandemic era: Women organisations share their experience" 22 May 2020.

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<sup>287</sup> [Baseline Evaluation Report on Greece](#) by the Council of Europe Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO), 14 November 2023.

<sup>288</sup> [Baseline Evaluation Report on Greece](#) by the Council of Europe Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO), 14 November, 2023, paragraphs 81- 92, 192, 196.

<sup>289</sup> Article 12 (Competences) paragraph 1(f) of Law 4780/2021, "...the GNCHR shall in particular: ...f) undertake initiatives for the cultivation of respect for human rights within the framework of the educational system..."



- The President of the GNCHR, Maria Gavouneli, spoke to the radio “Athens 9.84” on the occasion of the International Day for the Elimination of Violence against Women on 25 November 2020.
- GNCHR Press Release entitled “Zero tolerance for Gender violence” on 19 January 2022.
- 3rd GNCHR Educational Action for women's empowerment and substantive equality entitled: "Combating gender-based violence through experiential activities and new technologies", on 1 January 2022.
- [Participation](#) of the GNCHR in a training programme for 17,000 police officers on human rights issues focused on protection from violence and domestic violence, February-April 2022.
- Participation of the President of the GNCHR, Maria Gavouneli, in the online conference co-organised by the GNCHR, the National Transparency Authority and the UNHCR entitled: “We are joining Forces to Tackle Gender-based Violence phenomena,” which took place on 26 October 2022.



In the light of the foregoing, the GNCHR, addresses the following Recommendations to the Greek State, in line with the Recommendations of the GREVIO:

- 1. The GNCHR calls on the relevant bodies to adopt measures for the systematic and comprehensive education of everyone involved in procedures addressing violence against women and domestic violence with a view to a thorough understanding of the different forms of violence against women.***
- 2. The GNCHR calls on the relevant bodies to encourage the reporting of domestic violence incidents against women and girls by raising awareness among women and men, through, inter alia, educational and media campaigns, with the active participation of women's organisations, on the criminal nature of violence against women, the dismantling of its social legitimacy and the stigma it entails, and the***



*protection of women from retaliation for reporting incidents of gender-based violence.*<sup>290</sup>

*3. The GNCHR calls on the State to take particular note of the GREVIO Experts Recommendation no. 92 to the national authorities, as well as the CEDAW Recommendations in its Concluding Observations on Greece in 2024,<sup>291</sup> through the implementation of additional measures to ensure that all professionals working with victims or perpetrators of all forms of violence covered by the Istanbul Convention, in particular the judiciary, but law enforcement bodies as well, are systematically and compulsorily trained on a continuous basis to identify and respond to all forms of violence covered by the Convention. To this end, the Greek authorities should in particular ensure that:*

*i) initial and in-house training on violence against women provided in all professional categories is in line with the Istanbul Convention*

*ii) the training provided covers issues such as gender stereotypes, the difference between conflict and violence, the recognition of victims, the rights and needs of the victims, the prevention of secondary victimisation, the impact of violence on children exposed to it and violence against women exposed to multiple discrimination*

*iii) adequate resources are provided for training programmes and initiatives, including those provided by NGOs, as well as that the impact of the programmes is properly evaluated.*

*4. The GNCHR calls on the State to ensure that professionals involved in addressing the legal and social phenomenon of child sexual abuse and exploitation are subject to constant monitoring, supervision and evaluation in the context of their responsibilities, accompanied by disciplinary sanctions in cases of improper or inadequate performance of their duties.*

***ii) Specialised Services and Accommodation Facilities for victims of violence***

The GNCHR reiterates here its longstanding position that a key element of policies and measures for the effective response to the legal and social phenomenon of sexual abuse and exploitation is the **establishment of appropriate support and accommodation infrastructures**. Taking into account our country's ranking in the Gender Equality Index,<sup>292</sup>

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<sup>290</sup>CEDAW/C/GRC/CO/8-9: Concluding Observations on the combined fourth to sixth periodic report of Greece, 19 February 2024, paragraph 23-24.

<sup>291</sup>CEDAW/C/GRC/CO/8-9: Concluding Observations on the combined fourth to sixth periodic report of Greece, 19 February 2024, paragraphs 23-24.

<sup>292</sup> See EIGE Greece, [Gender Equality Index 2021, 2024](#). See also GNCHR submission of Information relevant to the implementation of the Convention on the Elimination of all forms of Discrimination against Women in response to the list of issues (CEDAW), 2 January 2024, [Observations of the GNCHR](#) on state's draft reply to the list of issues prior to the submission of the combined Eighth and Ninth Periodic Report under the Convention on the Elimination of Discrimination against Women (CEDAW), 9 April 2023 page 6, and

as well as the observations of the *Committee on the Elimination of Discrimination against Women*,<sup>293</sup> the National Commission highlights the **need for the State to establish support accessible infrastructures within the community**. This is also repeated by the *CEDAW Committee* in the Concluding Observations of its Report on Greece in 2024.<sup>294</sup> The provision and **operation of a coherent accommodation infrastructure network** is also stressed by the GREVIO as **being inextricably linked to the effective protection of victims**, urging the Greek authorities to remove all obstacles to their smooth operation throughout the country and to address the lack of resources available for such services. The fact that measures providing for the **accommodation of women who have experienced sexual abuse and their children**, so that they can recover and rebuild their self-esteem and regain a self-determined and independent life, constitute a **key aspect of protection**,<sup>295</sup> is confirmed by international agreements such as the Beijing Declaration and the Platform for Action of 1995, which calls on states to “*Provide well-funded shelters and relief support for girls and women subjected to violence, as well as medical, psychological and other counselling services and free or low-cost legal aid, where it is needed, as well as appropriate assistance to enable them to find a means of subsistence[...]*”.<sup>296</sup> In addition, it is underlined that the establishment and **operation of adequate accommodation infrastructures is also connected with the effective protection of child victims**.<sup>297</sup>

According to the WAVE Network Annual Report published every two years, an important tool providing an overview of the situation of specialized support services for women in 46 European countries, there is a shortage of 622 beds in 2021, whereas in 2023 the number was slightly risen touching 636 beds.

### Shelters

Year	Total number of women-only shelters	Number of existing bed spaces	Number of bed spaces needed	Number of beds missing	Percentage of beds missing
2021	24	450	1072	622	58%

GNCHR Information relevant to the implementation of the Convention on the Elimination of all forms of Discrimination against Women – CEDAW, 21 October 2020.

<sup>293</sup> Convention on the Elimination of discrimination against women, [General Recommendation No 35](#) on gender-based violence against women, updating general recommendation No. 19 (1992) CEDAW/C/GC/35, 14 July 2017, paragraph 20.

<sup>294</sup> CEDAW/C/GRC/CO/8-9: Concluding Observations on the combined fourth to sixth periodic report of Greece, 19 February 2024, paragraphs 45-46.

<sup>295</sup> See [Recommendations of the GNCHR on the protection of childhood: “Health and Welfare](#), May 2014, pages 17, 26, [GNCHR Observations on the National Action Plan on the Rights of the Child](#), 19 November 2018, pages 11, 23-24, [GNCHR Observations on the 2021-2025 Greek National Gender Equality Action Plan of the Ministry of Labour and Social Affairs](#), 27 September 2021, pages 16, 31.

<sup>296</sup> [Beijing Declaration and Platform for Action](#), adopted at the 16th Plenary Session, on 15 September 1995.

<sup>297</sup> See [Observations of the GNCHR on the National Action Plan on the Rights of the Child](#), 19 November 2018, 11, 23-24, [GNCHR Recommendations on child protection “Health and Welfare”](#), May 2014, pages 17, 26.

2023	22	410	1046	636	60%
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WAVE-country Report 2021, 2023<sup>298</sup>

The **findings** of the audit conducted in 2021, by the Hellenic Court of Audit at the request of the Special Permanent Committee on Institutions and Transparency of the Parliament entitled "*Gender-based violence: How much do shelters contribute to the effective protection of victims of gender-based violence?*", <sup>299</sup> the aim of which was to determine whether women victims of gender-based violence in shelters are effectively protected, for the period from 01.07.2021 to 30.09.2021, **are not really encouraging**. More specifically, as ruled by the seven Commissioners' Departments of the Court of Audit that carried out audits throughout the country, among other things **i)** the number of requests for accommodation in the Shelters is disproportionate to the general increase in the phenomenon of gender-based violence over the last decade **(ii)** the infrastructure and equipment of the Shelters do not meet hygiene and safety requirements **(iii)** services provided to victims were found to be deficient in the staffing of the Shelters and in the adequate supervision and training of their staff and **(iv)** the services of the Shelters are not sufficiently evaluated so as to be redesigned according to the needs and improved.

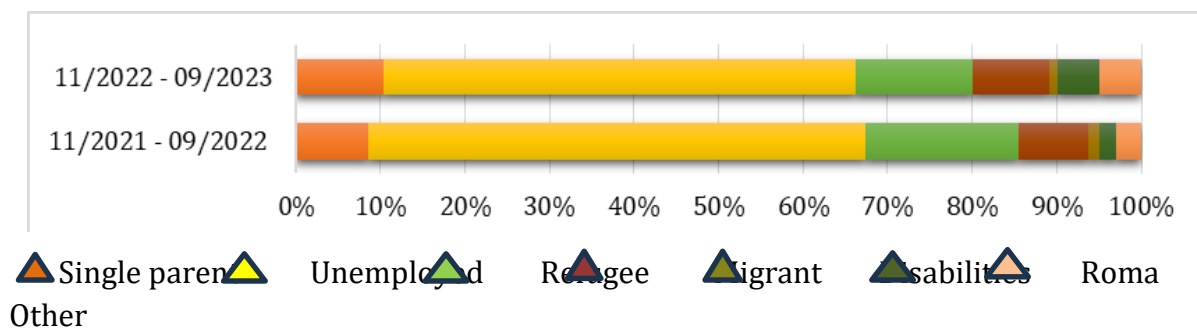
The GNCHR takes this opportunity to reiterate that to date, **no official statistical data are collected on gender-based violence against vulnerable groups**, namely against women with disabilities, migrant/refugee women, Roma women and LGBTI women, as already stated in the *GNCHR Observations on the 2023 State's Report* and in its *Parallel Report* to the same Committee in January 2024. In the **Hellenic Police Annual Report**, the available data by the **Department of Domestic Violence** are classified only by gender, age and nationality, while in the **2nd, 3rd, 4th and 5th Annual Report on Violence against Women of the General Secretariat for Equality and Human Rights (GGIAD)**, there are standardised references to the dimension of vulnerability, however, **without indicators per group of abused women, victims of gender-based violence**. **A detailed recording and presentation is carried out only for women who are victims of multiple discrimination, who usually make up about 10% of the women accommodated**. You can read below the data recorded by form of discrimination, according to the 3rd Annual Report on Violence against Women in the reporting period from November 2021 to September 2022, on incidents and grounds of multiple discrimination reported by women accommodated: Single parent (25→8.5%), Unemployed (172→58.9%), Refugee (53→18.1%), Migrant (24→8.2%), Women with Disabilities (4→1.3%), Roma (6→2%), Other (9→3%). According to the 4th Annual Report in the reporting period from November 2022 to September 2023, the following data by form of discrimination are

<sup>298</sup> WAVE-country Report 2021, Vienna, Austria, December 2021; WAVE-Country Report 2023, page 121ff.

<sup>299</sup> Hellenic Court of Audit, *Gender-based violence: How much do shelters contribute to the effective protection of victims of gender-based violence?* Audit report 4/2021 Annual audit program 2021.

recorded: Single parent (95→ 10.5%), Unemployed (197→56%), Refugee (48→14%), Migrant (31→9%), Women with Disabilities (3→1%), Roma (16→5%), Other (18→5%). As highlighted in the 4th Annual Report on Violence against Women of the General Secretariat for Equality and Human Rights (GGIAD),<sup>300</sup> **women with disabilities** in particular, often experience domestic or sexual violence and abuse, which seriously jeopardizes their physical and mental integrity.

### *Categories of victims of domestic or sexual violence and abuse*

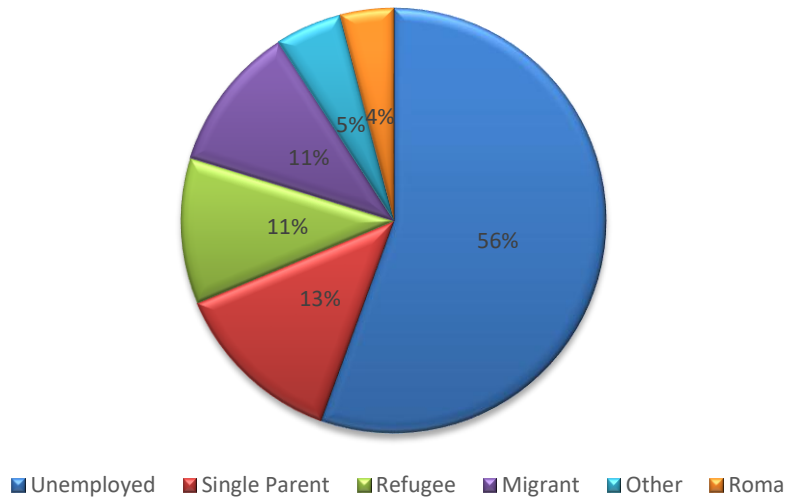


Similarly, for the reference period from 1 January 2024 to 30 September 2024, slightly over half of women reported discrimination due to unemployment (166 → 56%), a percentage slightly lower than in previous years.<sup>301</sup> Additionally, 13% (→41) reported experiencing discrimination due to single parenthood, while 11% (→33) identified their refugee or migrant status as a basis for discrimination (34 → 11%). The same percentage as in previous years was recorded among women who reported Roma origin as a reason for discrimination (14 → 4%).

<sup>300</sup> 4th Annual Report on violence against Women, General Secretariat for Equality and Human Rights, November 2023, page 55.

<sup>301</sup> 5th Annual Report on Violence against Women, General Secretariat for Equality and Human Rights, November 2024, page 171.

### Categories of victims of domestic or sexual violence and abuse



### Categories of hosted women-victims of violence and abuse, 2024

Form of discrimination	2021-2022	2022-2023	2024 (until 30/9)
Unemployed	58,9%	56%	55%
Single parent	8,5%	10,5%	13%
Refugee	18,1%	14%	11%
Immigrant	8,2%	9%	11%
Roma	2%	5%	4%
Disabled	1,3%	1%	—
Other	3%	5%	5%

Overall, the lack of analytical data on the number of accommodated women victims of gender-based or domestic violence broken down by vulnerability category, which exceeds the number of recorded cases by about 80% compared to multiple discrimination cases, is a major obstacle at all levels to preventing, addressing and effectively combating the crime of violence and domestic violence in practice. On the basis of the situation presented in the official reports, where very low percentages of women with



disabilities and Roma women among those accommodated in the structures of the General Secretary of Family Policy and Gender Equality (GGOPIF) are observed, it is noticed that data are indicative and do not reflect the total number of victims of violence.

In the light of the above, as illustrated in the *GNCHR Observations on the 2023 State's Report*, the GNCHR believes that **the establishment and operation of referral centres and shelters specialising in cases of rape or sexual violence is of the utmost necessity and urgency**. Emergency medical/forensic services provided to victims of sexual violence fall under the jurisdiction of the local **Forensic Services**, subject to the Ministry of Justice (Article 26(2) of Presidential Decree 96/2017), which **apparently are not equally and adequately distributed geographically throughout the country**. More specifically, besides the Athens Forensic Service, 13 other local Forensic Services operate (Article 26(2) of Presidential Decree 96/2017), which do not cover all areas of the Greek territory. Outside Athens there is only one (1) Forensic Service for each Region, whereas in the North Aegean Region there is none to date. During an **evaluation visit by the GREVIO delegation** at its premises on 21 February 2023, the GNCHR had the opportunity to inform the Expert Group of the admittedly **difficult proceedings for rape victims across the country**.<sup>302</sup> With deep concern, GREVIO, in its report, urges the Greek authorities to take concrete measures for accommodation available to **women finding themselves in emergency situations**.<sup>303</sup>

On 18 January 2024, a *Memorandum of Cooperation* was signed between the *General Secretariat for Equality and Human Rights* and the *Panhellenic Federation of Hoteliers* aiming to jointly develop initiatives and actions for the prevention and combating of violence against women and gender-based harassment in the workplace, within the framework of *International Labour Convention 190*, as ratified by Law 4808/2021. The *Panhellenic Federation of Hoteliers* represents 55 hotel Associations with 6,500 member hotels employing approximately 200,000 people, over 50% of whom are women. In the framework of the implementation of the *Memorandum of Cooperation*, the *General Secretariat for Equality and Human Rights* has access to accommodations provided free of charge by the Federation, which operates as a supplementary resource to the network of shelters, to meet urgent needs for immediate accommodation for women victims of domestic violence and their children. From May 2024 to September 2024, the *Panhellenic Federation* accommodations services were provided to 31 women in need of emergency shelter. The areas where urgent accommodation was required included Attica, Thessaloniki, Rhodes, and Crete.

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<sup>302</sup> The visit of the GREVIO Group to the GNCHR premises on 21 February 2023 was one of the steps of the monitoring process of the implementation of the Council of Europe Convention on preventing and combating violence against women and domestic violence (Istanbul Convention) by Greece.

<sup>303</sup> [Baseline Evaluation Report on Greece](#) by the *Council of Europe Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO)*, 14 November, 2023, paragraph 146.

Taking into consideration both the current reality experienced by women victims of violence as well as the factual and legal difficulties encountered in this field, the GNCHR addresses the following recommendations to the Greek State:

**1. The GNCHR urgently calls on the State to make public the data collected in the context of the recording of cases of women referred for accommodation to the infrastructures of the Network of the General Secretariat for Equality and Human Rights (GGIAD), and in particular to provide detailed statistics on the number of women who have experienced gender-based violence, domestic violence, or multiple discrimination, broken down by vulnerability category (e.g. Roma women, women with disabilities, migrant women, refugee women, LBTI women, etc.<sup>304</sup>). Given that the structures are those collecting this data, (i) processing the data in cooperation with the competent authorities and (ii) including it in the annual Reports of the GGIAD will contribute to an objective presentation of the situation, enhance transparency and reliability, and support the more effective management and response to the phenomenon. *The same applies to the data or support services of the private sector.***

**2. The GNCHR calls on the State to ensure that professionals working in support and prevention structures, structures providing psychological, social and legal support and accommodation, interpreters, education professionals, as well as all relevant state officials, including employees of law enforcement bodies, judicial and penitentiary authorities, are actively committed in the performance of their duties and assume responsibility for providing effective support to victims throughout the proceedings, and respect the specific characteristics of the victim, such as age, race, colour, religion, national or ethnic origin, sexual orientation, gender identity or characteristics or disability.**

### *iii) Cyberviolence against women and girls*

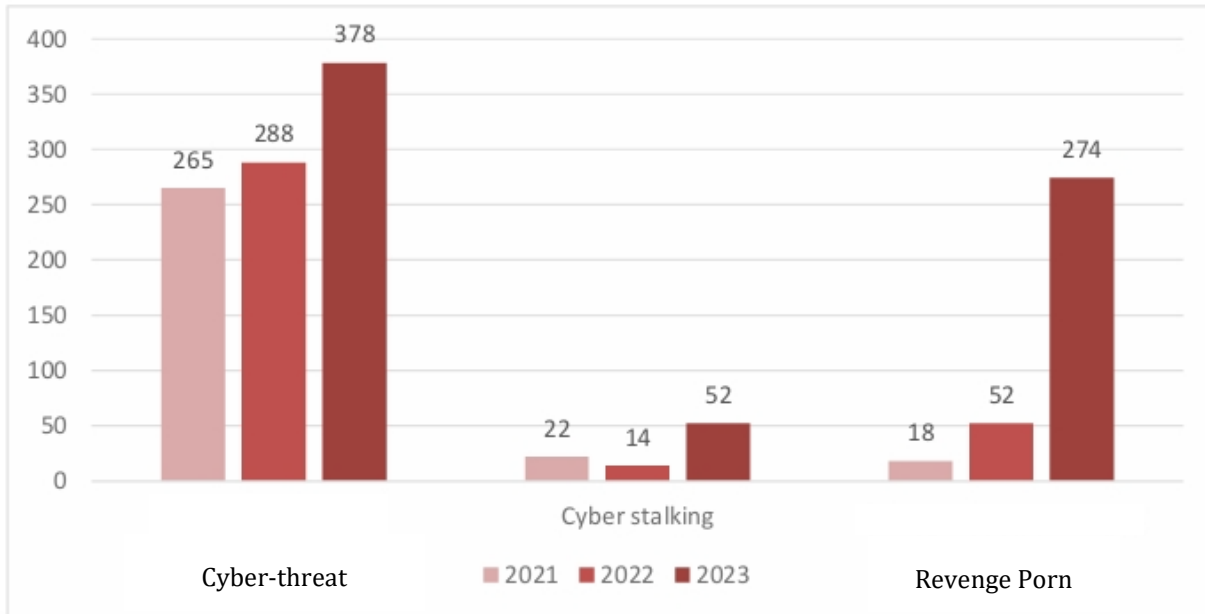
In 2023, a significant increase in police reports was observed compared to the previous two years regarding the offences of online threats, cyberstalking, and revenge pornography.<sup>305</sup> In more detail:

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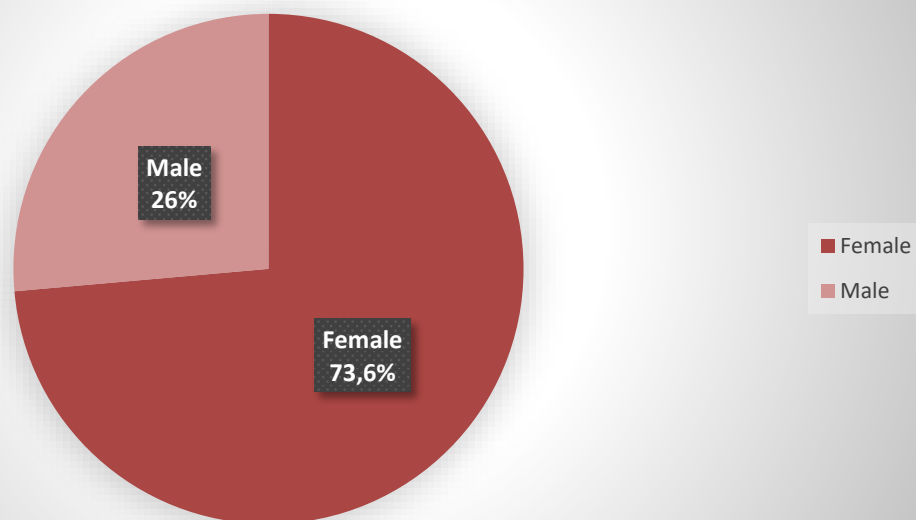
<sup>304</sup> The term LBTI Women is used by GREVIO in the [Evaluation Report on Greece](#), paragraphs 16, 18, 34, 137, 172, 14 November 2023,

<sup>305</sup> [5th Annual Report on Violence against Women](#), General Secretariat for Equality and Human Rights, November 2024, page 123.

**Number of victims of online bullying, cyber stalking and revenge pornography per year (Greek Police, 2021-2023)<sup>306</sup>**

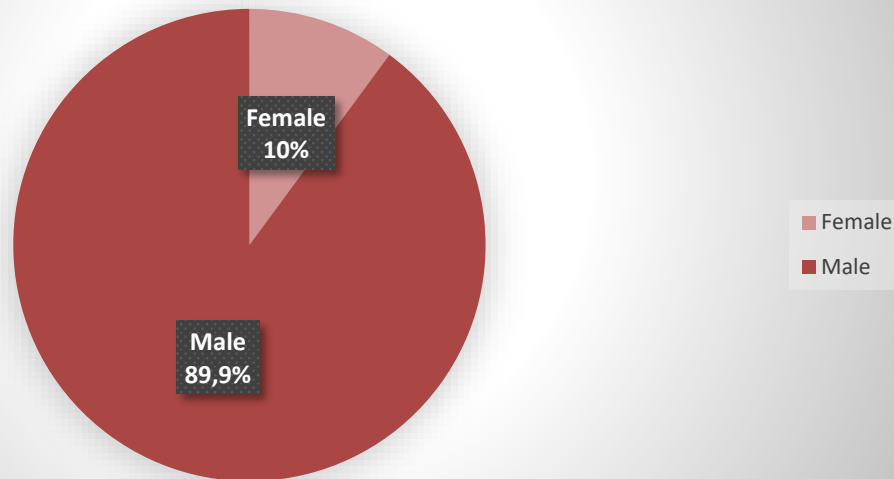


**Sex of the Revenge Porn Victims (ELAS, 2023)**



<sup>306</sup> [5th Annual Report on Violence against Women](#), General Secretariat for Equality and Human Rights, November 2024, page 123.

### Sex of the Revenge Porn Perpetrators (ELAS, 2023)



The gender of the victim is available in almost half of the recorded victims (129, 47.1% of the total).<sup>307</sup> Data on the perpetrator's gender is limited, as it is recorded in only 89 cases (32.7% of the total number of perpetrators). It becomes clear that the vast majority of victims are women (73.6%), while the perpetrators were almost entirely men (89.9%).

The recent initiatives at the level of the Council of Europe and the EU aiming at the institutional safeguarding of the protection of women and girls from cyberviolence constitute significant developments, warmly welcomed by the GNCHR. The GNCHR draws the attention of the State to *GREVIO's General Recommendation No. 1*,<sup>308</sup> on the digital dimension of violence against women (2021), which requires **States Parties to create the necessary legal and policy framework covering all forms of violence against women including activities carried out with the use of technology and communication equipment**, despite the fact that the Istanbul Convention does not make explicit reference to cyberviolence against women. While the *Recommendation* acknowledges that the Istanbul Convention provides for an important legal framework on the prevention and fight against the digital dimension of violence against women and domestic violence, it also notes that this framework is complemented by other relevant instruments, such as the Council of Europe Convention on Cybercrime (Budapest Convention).<sup>309</sup> GREVIO, in the light of the general finding that laws and policies at national level often disregard the digital dimension of cyber-violence against women, is in fact undertaking a substantive **meta-reading of the**

<sup>307</sup> 5th Annual Report on Violence against Women, General Secretariat for Equality and Human Rights, November 2024, page 125.

<sup>308</sup> GREVIO *GREVIO's General Recommendation, No. 1 on the digital dimension of violence against women (2021)*, Council of Europe, Strasbourg, 20 October 2021, pages 16 and 26.

<sup>309</sup> Law 4411/2016 ratifying the Budapest Convention on Cybercrime, 23.11.2001, 3 August 2016.

**Istanbul Convention**, in order to highlight the way cyberviolence is addressed, the measures for tackling it within the provisions of the Convention, and the protection of victims, including their access to justice. In this context, GREVIO in its, [Evaluation Report on Greece](#),<sup>310</sup> taking into account the significant increase in cyber violence against women including online hate speech, image-based abuse, online stalking and online sexual harassment, particularly during the Covid-19 pandemic, welcomed the criminalisation of the offence of non-consensual dissemination of images of a sexual nature (Article 38 *Revenge pornography - Insertion of Article 346 of the Criminal Code* of Law 4947/ 2022). The new provision defines image-based sexual abuse as a separate offence against sexual freedom in Greece and criminalises the dissemination of personal images or material without the consent of the person depicted.<sup>311</sup>

Likewise, this is the aim of the Proposal for a Directive of the European Parliament and of the Council on combating violence against women and domestic violence COM/2022/105 final, which, on the legal basis of Article 82 (2) and Article 83(2) 1 TFEU<sup>312</sup> provides for cyber violence against women and girls, i.e. gender-based violence on the internet, as a distinct form of violence and therefore the right of victims to claim compensation from the perpetrator.<sup>313</sup> In fact, in Article 83(1) TFEU, the term '*computer-related crime*' covers offences committed with the use of internet technologies or which are inextricably linked to such use. The EIGE report notes that, "*...so far, cyber violence against women and girls is not fully understood or treated as a criminal offence at the EU level and no separate gender-specific study has been carried out on its extent and impact, while national surveys in EU Member States are limited.*"

The GNCHR, following with increased attention the country's compliance with the new developments, refers, inter alia, to the Recommendations made in its Observations to the *2022-2027 National Action Plan for the Protection of children against sexual abuse and exploitation*, in November 2022,<sup>314</sup> calling on the competent authorities to strengthen **national rules and mechanisms ensuring accountability and transparency** with regard

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<sup>310</sup> [Baseline Evaluation Report on Greece](#) by the Council of Europe Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO), 14 November, 2023, pages 45-49.

<sup>311</sup> Article 38 (Revenge pornography - Insertion of Article 346 of the Criminal Code) of Law 4947/2022 *Transposition of the Directive (EU) 2019/713 of the European Parliament and of the Council of 17 April 2019 on combating fraud and counterfeiting of non-cash means of payment and replacing Council Framework Decision 2001/413/JHA and other urgent provisions*.

<sup>312</sup> [Proposal for a Directive](#) of the European Parliament and of the Council on combating violence against women and domestic violence, pages 5, 7, 13, 15-17, 21.

<sup>313</sup> In Article 83(1) TFEU, the term '*computer-related crime*' covers offences committed through the use of internet technologies which are inextricably linked to such use.

<sup>314</sup> [GNCHR Observations on the 2022-2027 National Action Plan for the Protection of Children from Sexual Abuse and Exploitation](#) November 2022, pages 17- 18, 34-35.



to the security of digital services and online platforms in cases of illegal content, goods or services trafficking, always in line with EU law.<sup>315</sup>

Having regard to the above, and in view of the **need to ensure a holistic response to all forms of violence against women and domestic violence**, the GNCHR addresses the following recommendations to the Greek State focusing on the establishment of an effective, comprehensive and coordinated set of policies to address and combat digital gender-based violence, which requires the cooperation of all stakeholders and stakeholders, as well as credible cooperation at international level:

***1. The GNCHR calls on the State to ensure the prevention, support and protection of victims and the fight against the digital dimension of violence against women, through the revision of relevant legislation and the adoption of new legislation, where appropriate, in accordance with the standards of the Istanbul Convention and other standards, including the Budapest Convention, and taking into account the complex and multidimensional nature of the problem.***<sup>316</sup>

***2. The GNCHR recommends that the competent bodies comply with the GREVIO Recommendation No1 on the digital dimension of violence against women (2021), calling on them in particular to:***<sup>317</sup>

***i) implement the necessary legislative and other measures to promote and protect the right for everyone, particularly women, to live free from violence in both the public and the private sphere, in accordance with Article 4 of the Istanbul Convention.***

***(ii) facilitate formal and informal dialogue, cooperation among and coordination of units/experts with existing cybercrime units/experts, as well as of services responsible for responding to victims of digital gender-based violence.***

***(iii) equip law enforcement authorities and other criminal justice bodies with the necessary human, financial and technical resources to effectively investigate and prosecute the digital dimension of violence against women in accordance with their due diligence obligations under Article 5 of the Istanbul Convention.***

***(iv) increase capacity building efforts for professionals engaged in criminal justice and law enforcement bodies and provide them with the necessary expertise and resources on how to use existing legal frameworks, in order to address the digital dimension of violence against women, as well as to develop their forensic capacities for collecting and***

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<sup>315</sup> [Communication](#) from the Commission to the EP, the Council, the EESC and the Committee of the Regions, EU Strategy for a more effective fight against child sexual abuse, COM (2020) 607 final, page 6 [Council of Europe Guidelines](#) to respect, protect and fulfil the rights of the child in the digital environment CM/Rec (2018) 7 of the Committee of Ministers (2018), pages 5-29.

<sup>316</sup> [GREVIO's General Recommendation No. 1 on the digital dimension of violence against women](#), Council of Europe, Strasbourg, 20 October 2021, paragraphs 35, 50-51.

<sup>317</sup> [GREVIO's General Recommendation No. 1 on the digital dimension of violence against women](#), Council of Europe, Strasbourg, 20 October 2021, paragraphs 35, 50-51.

*securing electronic evidence without causing secondary victimisation and re-traumatisation of the victim.*

*v) take steps to end impunity for activities of cyber violence against women, encouraging all stakeholders to take responsibility, notably through strict supervision and content removal, where necessary and encouraging media to cooperate with law enforcement bodies.*

**3. The GNCHR recommends that Member States implement the guidelines set out in the Recommendation CM/Rec(2018)2 of the Council of Europe Committee of Ministers on the roles and responsibilities of Internet Intermediaries<sup>318</sup> in the design and implementation of legislative frameworks on Internet Intermediaries in accordance with the obligations under the Istanbul Convention.**

#### *iv) Femicides*

The GNCHR, having monitored the rise in violence, notes with concern the extent of the phenomenon of femicide in our country. Specifically, there is a significant increase in the recorded femicides, both in absolute numbers and as a proportion of intentional homicides with female victims. The ESDIF, in the framework of an Action aiming at the *Preparation of studies and research for the development and improvement of gender equality actions, provides for the preparation of a study on the extent of the crime of femicide in Greece over the last ten years.*<sup>319</sup> According to the collection of the Hellenic Police data, as recorded in the 4th Annual Report of the General Secretariat for Equality and Human Rights (GGIAD) on violence against women,<sup>320</sup> in 2021 and 2022 the number of femicides was 23 and 24 respectively. In detail, the statistical picture is as follows:

Year	Femicides in the context of domestic violence	Female homicide victims	Femicides as a percentage of female homicide victims (%)
2010	11	33	33.3
2011	12	31	38.7

<sup>318</sup> Recommendation CM/Rec(2018)2 of the Council of Europe Committee of Ministers to member states on the roles and responsibilities of Internet Intermediaries, 7 March 2018.

<sup>319</sup> 2016 - 2020 National Action Plan for Gender Equality (ESDIF), page 124.

<sup>320</sup> 4<sup>th</sup> Annual Report on violence against Women (GGIAD, November 2023), pages 117, 126-127. The report highlights that the available administrative data for Greece do not meet the comparability criteria as defined by EIGE. Corresponding to the index 9 women victims of femicide by spouse/partner as a percentage of female homicide victims, it is the number of female victims of intentional homicide (299 PC) in conjunction with Law 3500/2006 on domestic violence that is recorded.

2012	6	40	15.0
2013	13	52	25.0
2014	12	27	44.4
2015	11	30	36.7
2016	13	26	50.0
2017	7	23	30.4
2018	13	29	44.8
2019	8	19	42.1
2020	8	18	44.4
2021	23	33	69.7
2022	24	45	53.3
2023	11	17	64.7
2024	15		

In its Statement on Femicide, on 5 April 2024, the GNCHR is noting that although **Greece is typically complying with** the international and EU regulatory framework, the adoption and implementation of strategies and actions and the operation of services and structures aimed at preventing and suppressing the phenomenon of gender-based violence,<sup>321</sup> including stalking, **in practice, protection turns out to be inadequate.**<sup>322</sup>

As clearly evidenced by the statistics of the Hellenic Police,<sup>323</sup> **not only is the current institutional framework inadequate, but there is a substantial systemic problem**

<sup>321</sup> (i) as of 2021, the 2021-2025 Greek National Gender Equality Action Plan is being implemented, based on 4 main thematic pillars, one of which relates to the *Prevention and combating of gender and domestic violence* covering 4 key objectives and 17 Actions, ii) in recent years, a total of 73 Specialised Departments for Combating Domestic Violence have been set up and are currently operating, with their corresponding homonymous Offices at the General and Regional Police Directorates of the country iii) from February to April 2022, the GNCHR solely participated in a training program for 17,000 police officers on human rights issues with emphasis on protection from violence and domestic violence.

<sup>322</sup> GNCHR Statement on Femicides, 5 April 2024.

<sup>323</sup> Hellenic Police, [2022 Annual Report of the Project of Domestic Violence Response](#) (November 2023), page 100 et seq

observed, part of which is primarily the absence of systematic, gender-sensitive risk assessment and security management in all cases of violence against women. The pathogenic nature of the so-called 'police culture' is also an important parameter for the functioning and effectiveness of security forces. There are quite a large number of cases where the victim or the potential victim, when addressing to frontline officers, is either discouraged or not referred to appropriate shelters or health services or is not provided with any assistance at all and is forced to leave with no action whatsoever. According to the GNCHR statement on femicide, following the **5th in a row femicide for the year 2024, which was committed outside a Police Station**, the assessment of the situation suggests that indifference, incompetence, negligence, operational deficiency, and perhaps even fear of responsibility and a sense of impunity are equally deadly.

In light of the above, the GNCHR underlines the importance of the full implementation of the Istanbul Convention and compliance with the recommendations of the GREVIO Committee, which urges the Greek authorities, *inter alia*, to **increase the number and capacity of shelters for women victims of violence** throughout the country, **address the lack of resources**, remove any barriers that impede victims' access exposed to or being at risk of intersectional discrimination to help and **take measures for accommodation available to women in emergency situations**.

At the same time, it encourages the State to provide appropriate, systematic and **compulsory continuing education to law enforcement officers** who work with or come into contact with victims or perpetrators of gender-based violence and improve the legal framework on civil liability and disciplinary measures against state officials for non-compliance with their obligations. The GNCHR takes this opportunity to reiterate the need for law enforcement through the **application of dissuasive sanctions against perpetrators combined with disciplinary measures against professionals** in cases where they violate their legal obligations and codes of conduct. Moreover, there is a **need to coordinate and interconnect the relevant services involved, the police and emergency services**, support services and infrastructures, to facilitate **victims' access to them** and ensure their effective protection through simplified and accessible procedures.

The **reactivation of the National Council against Racism and Intolerance** is also of key importance, as the gender mainstreaming is often combined with other vulnerabilities, resulting in multiple discrimination against women and females. What emerges as important is the need for intensive monitoring of the implementation of policies, **actions and measures, continuous internal and external evaluation of and control** over staff in terms of efficiency and proper performance of their tasks, with objective measurable indicators and criteria of effectiveness, as well as the continuous balancing of obstacles affecting the prevention and protection of victims. As regards the **external evaluation, the role of the National Commission as the independent advisory body to the State is crucial in terms of ensuring appropriate guarantees and institutional counterbalances** throughout the process. **Relevant EU proposals should also have been**

taken into account as early as 2015,<sup>324</sup> including comments and recommendations of the European Institute for Gender Equality (EIGE).<sup>325</sup>

Given that **providing for the safety of victims of all forms of gender-based violence and facilitating their access to the police and justice** is one of the most fundamental aspects of the protection of fundamental rights and should therefore be a key priority when addressing cases of gender-based violence, the GNCHR calls on the State, based on the principle of zero tolerance, to ensure that the following conditions are met:

***1. Systematic, gender-sensitive risk assessment and safety management in all cases of violence against women These assessments should be based on an effective, multi-service approach, including dedicated bodies and NGOs, in order to mitigate the risks to the safety of victims***

***2. The immediate, appropriate and prompt response of the prosecuting authorities to calls for help and the adoption of the necessary operational measures to protect any person whose life is at risk from another person's violence***

***3. The availability of emergency barring orders***

***4. The effective operation of police services and structures and all social security and support services provided to women under threat, including foreign women, Roma women, women with disabilities and LGBTQI+ persons***

***5. The seamless provision of an effective and better-organized referral mechanism for victims to the appropriate support structures.***

***The establishment and operation of appropriate supportive and accessible accommodation facilities in cases of rape or referral centres for victims of sexual violence within the community as well***

***6. The continuing and intensified training of all law enforcement officers who work with or come into contact with victims or perpetrators of gender-based violence on the basis of standardised protocols to be followed by all professionals on the treatment of women victims of rape/sexual violence***

***7. Both internal and external evaluation of measures and actions implemented, with the support of the National Commission, in order to provide the necessary guarantees and institutional counterbalances***

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<sup>324</sup> See [Motion for a Resolution](#) of the European Parliament, Factsheet: "[Let's put an end to violence against Women](#)", November 2020.

<sup>325</sup> EIGE "[Report: Terminology and indicators for data collection: Rape, femicide and intimate partner violence](#)", 2017. See also [EIGE's website](#) on femicide.

**8. The constant monitoring, supervision and accountability of the authorities and the imposition of disciplinary sanctions in cases of improper or inadequate performance of duties**

**9. A shift in the culture of suspicion towards and impunity of the police and the cultivation of a culture of trust**

**10. The systematic collection of analytical data statistics aimed at prompt and accurate monitoring of the phenomenon of gender-based violence, an obligation imposed by the Istanbul Convention**

**11. The continuation of the public dialogue on the inclusion in legislation of a definition of femicide as a gender-based crime (murder of women, girls and feminities on account of their gender), in line with the recommendations of the CEDAW Committee in its Concluding Observations to Greece in 2024.** <sup>326</sup>

Furthermore and in the light of the above:

**1. The GNCHR calls on the competent authorities to assess and implement regulations in light of international conventions binding on Greece, namely the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse, known as the Lanzarote Convention (2007), the Council of Europe Convention on preventing and combating violence against women and domestic violence (2011) and the UN Convention on the Rights of the Child (1989).**

**2. The GNCHR reiterates its Recommendation to create an Observatory which will i) officially recognise femicide as gender-based murder of women and girls, in accordance with the guarantees of European and international institutions and bodies, ii) collect comparable and analytical data on cases of femicide and (iii) prepare relevant studies and propose measures for prevention and early intervention to effectively protect victims and to combat the phenomenon. Apart from data on the profile of the victim and the perpetrator, the Observatory should further focus on collecting data on the number of complaints and the realisation of effective investigations as well as on cases of sound administration of justice through the imposition of appropriate penalties and sanctions without delays.**<sup>327</sup>

**3. The GNCHR reiterates its constant Recommendation for consultation with women's and feminist groups and organisations to ensure that interventions respond to the pressing needs of the victims.**

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<sup>326</sup> See UN CEDAW/C/GRC/CO/8-9: Concluding observations on the combined fourth to sixth Periodic Report of Greece, 19 February 2024, paragraph 24(a).

<sup>327</sup> [Observations by the GNCHR on the 2021-2025 Greek National Gender Equality Action Plan of the Hellenic Ministry of Labour and Social Affairs](#), 27 September 2021 See also the statement of the UN expert *Dubravka Šimonovic* entitled "Urgent action needed to end pandemic of crime and violence against women", on the International Day for the Elimination of violence against women, 25 November 2020.



## H. Access to justice

As the GNCHR has repeatedly pointed out, the Istanbul Convention is not effectively implemented in Greece and victims are deprived of the protection they are entitled to, since crucial criminal provisions are absent from the Criminal Code, while the Joint Ministerial Decisions provided for the claim for victims' compensation have not yet been issued.<sup>328</sup> In a press release, the League for Women's Rights has made public its positions on the failure to adequately adapt the national legislation to the Convention and the shortcomings of the ratification law, as early as 2021<sup>329</sup> Despite the fact that in its 2013 *Concluding Observations*, the CEDAW Committee expressed its concerns regarding the protection of women and girls victims of violence in Greece, calling on the Greek State to ensure strict enforcement of legislation, direct access of victims to legal protection and the prosecution and punishment of perpetrators,<sup>330</sup> in practice the situation remains broadly unchanged. In 2024, in its *Concluding Observations*, the CEDAW Committee reiterates the issue of women's access to justice, reiterating its [General Recommendation No.33 \(2015\)](#) on women's access to justice and underlining the need to enhance their rights awareness and the remedies to which they are entitled, with particular emphasis on informing women refugees, asylum seekers and migrant women.<sup>331</sup>

Recently, the #MeToo social movement and other similar groups have publicly highlighted in Greece the **extent of sexism, sexual abuse and harassment** faced mostly by women and girls, encouraging the reporting and disclosure of incidents on social networks. In fact, in the light of recent complaints in the field of sport concerning incidents of sexual abuse within the context of the exploitation of power relations, the GNCHR pointed out in a related Statement that **victims' access to justice, the effective investigation of violations involving acts against sexual integrity and freedom, and the proper administration of justice are among the key aspects of the protection of fundamental rights.**<sup>332</sup>

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<sup>328</sup> See in particular [Memorandum](#) of the National Commission for Human Rights (GNCHR) to the Committee set up by the Prime Minister for the Drafting of the National Strategy for the Equality of LGBTIQ+ persons, 30 June 2021, GNCHR, Report in view of the Universal Periodic Review (UPR) of the UN Human Rights Council, for Greece, March 2021, [GNCHR Observations on the Draft Bill of the Ministry of Labour and Social Affairs](#) "On Labour Protection - establishment of an independent Authority "Labour Inspectorate" - Ratification of the ILO Convention 190 on the Elimination of Violence and Harassment in the World of Work - Ratification of ILO Convention 187 on the Framework for the Promotion of Safety and Health at Work - Transposition of Directive (EU) 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance", 14 June 2021 page 19, Greek League for Women's Rights, Communication, International Women's Day: Today we do not celebrate, we stand vigilant and we demand, 8 March 2021

<sup>329</sup> [Press Release on 8 March, 2021](#), League for Women's Rights, on the occasion of International Women's Day.

<sup>330</sup> See [Concluding Observations](#) on the seventh periodic report of Greece adopted by the Committee at its fifty fourth session, [CEDAW/C/GRC/CO/7](#), 26 March 2013, paragraph 21(a).

<sup>331</sup> See *Concluding Observations on the combined fourth to sixth Periodic Report of Greece*, CEDAW/CGRC/CO/8-9, 19 February 2024, paragraphs 13 and 14.

<sup>332</sup> [GNCHR Statement](#) on the phenomena of sexual abuse within the context of exploitation of power relations in the light of recent complaints in the field of sport, January 2021.

In all its Annual Reports, the Racist Violence Recording Network (RVRN) (hereinafter the Network) has pointed out since 2020<sup>333</sup> that **the EU framework for victims of crime, including victims of domestic violence and violence against women, is not being implemented properly in our country**. The Network was created in mid-2011 by the NCHR and the Office of the United Nations High Commissioner for Refugees in Greece (UNHCR), with the participation of NGOs and civil society organisations, aiming to systematically record acts of racially motivated violence and to document the quantitative and qualitative trends of the phenomenon. The Network notes that although it welcomed the transposition of Directive 2012/29/EU<sup>334</sup> *establishing minimum standards on victims' rights* into national legislation by Law 4478/2017, Chapter D', recognising at the same time the importance of the earlier Directive 2004/80/EU<sup>335</sup> relating to *compensation to crime victims*, transposed into the national legal order by Law 3811/2009, in practice the adoption of ministerial decisions implementing the law is still pending, and in general, **administration of justice is delayed**. It should be noted that the two Directives aim to strengthen the position of crime victims by establishing basic rules relating to their protection, such as access to justice and entitlement to compensation from the state in cases where the perpetrator of the crime does not have the necessary resources to satisfy the victim or cannot be identified or cannot be prosecuted and punished. In detail, the areas on which the Network focuses in its Reports include the need to adequately inform and train police officers about their obligation to assist victims, intervene for their rescue and ensure their support and referral to the appropriate services, the one-dimensional treatment of the victim by medical personnel solely in terms of their health issues—namely, the absence of other forms of support (of a psychosocial nature) as well as the lack of connection between hospital staff and other medical service providers with the criminal justice process (e.g. informing victims of the possibility to file a complaint or submitting reports concerning the medical findings of the attack on the victim).<sup>336</sup> In addition, the Network highlights that these **rights apply to all victims without discrimination, regardless of their residence status**, while the European Commission is also examining good practices to facilitate migrant victims' access to justice, with the aim of dissociating the reporting of crimes from the return procedure, without compromising the effectiveness of the relevant processes.<sup>337</sup> The recent [2020-2023 National Action Plan against Racism and Intolerance](#) of the Ministry of Justice has also included to eliminate the existing difficulties in obtaining fair and

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<sup>333</sup> [RVRN 2020 Annual Report](#), pages 53-54, [RVRN 2021 Annual Report](#), pages 44-46, [RVRN 2022 Annual Report](#), pages 32-33.

<sup>334</sup> [Directive 2012/29/EU](#) of the European Parliament and of the Council of 25 October 2012 establishing minimum standards on the rights, support and protection of crime victims and replacing Council Framework Decision 2001/220/JHA Article 16 of the Directive stipulates that Member States shall promote measures to encourage offenders to provide adequate compensation to victims within a reasonable time.

<sup>335</sup> [Council Directive 2004/80/EC](#) relating to compensation to crime victims The Directive aims to address the difficulties that victims face in order to be granted a fair and adequate compensation because the offender lacks the necessary financial resources or cannot be identified or prosecuted.

<sup>336</sup> [RVRN 2020 Annual Report](#), pages 53-54.

<sup>337</sup> [EU Strategy on victims' Rights \(2020-2025\)](#), 24 June 2020, pages 17-18.

appropriate compensation for victims of intentional criminal acts, as well as, more broadly, to improve the related procedures.<sup>338</sup>

The phenomenon of underreporting of violence is also worth mentioning. According to the 2023 Annual Report of the RVRN, a large number of victims consistently state that they do not wish to file an official complaint regarding the racist violence they experienced — according to the this Report, the percentage of unreported incidents reached 63%.<sup>339</sup> Analysis of the testimonies indicates that a primary cause is the lack of trust in the authorities to investigate and/or protect victims, as well as the fear of experiencing violence again by the authority, highlighting the need to address secondary victimization.<sup>340</sup>

As regards the compensation to crime victims, the GNCHR refers to the statistics collected by the Equality Observatory of the GGIGAD for the period 2006-2022, according to which, a total of seven (7) applications have been submitted to the Compensation Authority of Greece, the competent body under Law 3811/2009 in such cases (Official Government Gazette 231 A'), from women victims of domestic violence and no compensation has been paid for any of these applications. It remains noteworthy that, at least during the years 2018–2020 and 2022 — a period during which the Istanbul Convention (Law 4531/2018) has been in force — the competent Authority did not receive any relevant application, and that the sole application submitted in 2021 did not result in the granting of the corresponding compensation.<sup>341</sup>

#### *Compensation to women victims of domestic violence*

	2006	2007	2008	2009	2010	2011	2012	2013	2014
<b>Applications</b>	-	-	-	-	1	2	-	1	1
<b>Grants</b>	-	-	-	-	0	0	-	0	0
	2015	2016	2017	2018	2019	2020	2021	2022	Total
<b>Applications</b>	-	1	-	-	-	-	1	-	7
<b>Grants</b>	-	0	-	-	-	-	0	-	0

The main problems relating to compensation are, in principle that not all victims are informed about their right to claim compensation and those who do apply are usually rejected. Moreover, as evidenced by the data, even when compensation is awarded to the

<sup>338</sup> RVRN 2021 Annual Report, pages 44-46; RVRN Annual Report 2023, page 28 ff.

<sup>339</sup> Statistics - RVRN.org

<sup>340</sup> RVRN Annual Report 2023, page 26.

<sup>341</sup> See 4th Annual Report on violence against Women, General Secretariat for Equality and Human Rights, November 2023, page 141 and 27<sup>th</sup> information Note, December 2020, the former General Secretariat for Gender Equality and Family Policy, GGIFOP, page 16.

victim, it is often not paid, because the offender lacks the necessary resources. Additionally, the procedures for claiming compensation can be very lengthy and complex. In the light of the above, the GNCHR expresses its deep disappointment at the failure of the competent state authorities to take all necessary measures to effectively implement the regulatory framework on fair and adequate state compensation to women victims of violent intentional crimes and to establish minimum standards for their rights, support and protection in accordance with Directive 2004/80/EU.<sup>342</sup>

Finally, concerning free legal assistance in criminal matters involving women, and in light of the *CEDAW Committee's* request for information on the measures taken "to train legal professionals, including the judiciary,<sup>343</sup> ethnic communities and religious leaders on the Convention and the Committee's general recommendations," the GNCHR draws the State's attention to the fact that the procedure remains inapplicable in both legislation and practice, despite the recent amendment of the legal assistance system by Law 4596/2019, who revised Law 3226/2004.<sup>344</sup> See



In the light of the above the GNCHR addresses the following recommendations to the Greek State:

**1. The GNCHR calls on the competent state bodies to consider the CEDAW [General Recommendation No.33 \(2015\)](#) on women's access to justice, as well as the Committee's Recommendations in its Concluding Observations to Greece (2024) on the need to enhance women's and girls' awareness of their rights and legal remedies available to them, with particular emphasis on informing women refugees, asylum seekers and migrants.**

**2. The GNCHR, taking into account the targeted Recommendations of the Network, and specifically focusing on the protection of women victims of violence, proposes, on the basis of the regulatory framework of Law 4478/2017, which, among other things,**

<sup>342</sup> See also [the 3rd Annual Report on violence against Women](#), General Secretariat for Family Policy and Gender Equality, November 2022.

UN CEDAW Committee, List of issues and questions prior to the submission of the eighth periodic report of Greece and [CEDAW/C/GRC/QPR/8](#), 17 November 2020, paragraph 4, and [GNCHR Observations](#) on State's draft reply to the list of issues prior to the submission of the combined Eighth and Ninth Periodic Report under the Convention on the Elimination of Discrimination against Women (CEDAW) 9 April 2023, pages 8-9.

***transposes the provisions of Directive 2012/29/EU establishing minimum standards on the rights, support and protection of victims of crime, the following:***

***(I) the establishment of an effective referral mechanism by the competent authorities for the coordination of the victim support system, the mapping of the services and actors involved at central, regional and local level and their integration into this mechanism, the definition of the competent authorities' operational framework within the mechanism, their engagement in assessing victims' needs and bringing them into contact with support services, the regularisation of the system's monitoring and the assessment of its efficiency,***

***ii) exploring in this direction the possibility of activating the Working Group created following an agreement between the competent authorities and the ODIHR, with the aim of developing an operational plan for the coordination of support services for victims of violence under Law 4478/2017,<sup>345</sup> and***

***iii) the adoption of specific measures ensuring comprehensive support for particularly vulnerable victims of gender-based violence on the basis of a victim-centred approach, promoting support for and protection of the victim on the basis of his/her needs, regardless of whether or not the incident of violence has been reported<sup>346</sup>***

With regard to the planning of actions toward the effective implementation of the Istanbul Convention in the framework of the 2021-2025 ESDIF, the GNCHR calls on the Greek State to take the following additional measures:

***3. The inclusion, among the main objectives of the National Action Plan for Gender Equality 2021-2025, of a specific goal aimed at eliminating the phenomenon of impunity for perpetrators. In particular, the Plan proposes the inclusion of Actions that facilitate the access of victims and witnesses to reporting and prosecution procedures in all places where these acts systematically take place and that encourage the punishment of perpetrators.***

***4. The coordination of all actors involved in the implementation of actions and measures aimed at simplifying and accelerating the procedures for the administration of justice in cases of violence against women and domestic violence, promoting remedies procedures and restorative justice measures under strict conditions (e.g. cases of underage offenders) and extending or abolishing the statute of limitations in specific crimes, including rape.***

In light of the above, the GNCHR urges the State to encourage the **media and information technology services to highlight the issue of intimate partner violence and its inadequate reporting**, as it should not be considered private, in accordance with the letter

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<sup>345</sup> [RVRN 2021 Annual Report](#), pages 45-46.

<sup>346</sup> [RVRN 2022 Annual Report](#), pages 32-33.

and guarantees of the Istanbul Convention.<sup>347</sup> With a full understanding of both the current reality experienced mainly by women and the real and legal difficulties in addressing it, the GNCHR proposes the allocation of appropriate financial and human resources <sup>348</sup> along with the implementation of:

**5. Clear and targeted Actions to prevent and combat violence against women and domestic violence and to protect victims of all forms of violence covered by the scope of the Istanbul Convention, in an immediate way, without delay and independently of any criminal prosecution. Additionally, administrative practices for the individualised support to victims of all forms of violence covered by the scope of the Istanbul Convention.**

**6. Actions and measures at national, regional and local level involving all relevant stakeholders (institutions, services and organisations), as well as non-governmental organisations and civil society, such as the recruitment or secondment of social workers and psychologists to police stations throughout the country, specialised in dealing with cases of sexual violence against women.**

#### *i) Penal Mediation*

Penal Mediation was introduced by Law 3500/2006 (Articles 11-13), as amended by Law 4531/2018, applicable to the offences of domestic violence, as a settlement of pecuniary claims arising from the crime of domestic violence, aiming at the restoration of family peace and the immediate satisfaction of the victims through the payment of reasonable and appropriate pecuniary compensation by the offenders. On the occasion of the adoption of Law 5090/2024 “Interventions in the Penal Code and the Code of Criminal Procedure to accelerate and improve the quality of criminal proceedings - Modernisation of the legislative framework for the prevention and fight against domestic violence”, the GNCHR reiterates that according to the changes introduced in the Civil Code by Law 4800/2021 “Reforms on parent-child relations, other issues of family law and other urgent provisions”, mediation is provided for in disputes concerning the exercise of parental responsibility, excluding, however, cases of domestic violence, as defined by law (Article 1514 of the Civil Code - Derogation from the joint exercise of parental responsibility, paragraph 2). In practice, until now, there remain significant gaps and shortcomings in the necessary support infrastructure for therapeutic programmes (the infrastructures where such programmes are carried out are mainly located in Athens, Piraeus and Thessaloniki), while communication and interconnection between all the competent services involved is also

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<sup>347</sup> See Istanbul Convention, Articles 3 *Definitions* and 17 *Participation of the private sector and the media*.

<sup>348</sup> See Law 4531/2018 Chapter II – *Integrated policies and data collection* Articles 7- 11 and Chapter IV – *Protection and support*, Articles 18-28.



problematic. As GREVIO points out in the [Baseline Evaluation Report on Greece](#),<sup>349</sup> **in our country no specific measures seem to be in place guaranteeing the safety of the victim during the mediation process**, and offenders often choose this mechanism in order to avoid prosecution. In particular, consideration should be given to GREVIO's Recommendation related to the provision of *Article 48 – Prohibition of mandatory alternative dispute resolution processes or sentencing* of the Istanbul Convention, which strongly encourages the Greek authorities to take all necessary measures to ensure that the use of mediation in cases of violence against women is based on full respect for the rights, needs and safety of victims. *In particular, mediation should only be used for women victims of violence who are in a position to decide freely whether to accept or refuse the procedure. The Greek authorities should ensure that police officers, prosecutors, mediators and all other relevant parties in the criminal justice sector are provided with specific guidelines and training focusing on the gender mainstreaming in domestic violence and its impact on the ability of victims to enter a mediation process in equal terms with the perpetrator.*<sup>350</sup>

The GNCHR shares the conclusions of GREVIO,<sup>351</sup> according to which programmes for perpetrators cannot replace prosecution or conviction, in line with the Recommendations of the Group, which calls on the authorities to ensure that the *interaction between perpetrator programmes and criminal proceedings is not allowed to operate abusively or to the detriment of victims' right to a fair legal process*. In cases of misdemeanours involving domestic violence, the Public Prosecutor responsible for initiating criminal proceedings was, until now, also responsible for exploring the possibility of mediation. **The expansion of the institution of penal mediation** under Law 5090/2024 (Article 123: Conditions for penal mediation – Amendment of Article 11 of Law 3500/2006), which includes, among other things, the **possibility for investigating officials, in addition to the Public Prosecutor, to use the penal mediation** process on condition that the perpetrator attends a special counselling-therapeutic programme for dealing with domestic violence in a public institution or a private institution supervised by the state, should **be safeguarded with strict guarantees** and specific criteria. As stipulated in the Regulatory Impact Analysis Report of Law 5090/2024, the institution of the penal mediation aims at the faster resolution of cases and the restoration of disrupted family relationships through the institution of restorative justice;<sup>352</sup> however, it is essential to have an effective mechanism

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<sup>349</sup> [Baseline Evaluation Report on Greece](#) by the Council of Europe Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO), 14 November, 2023, pages 45-49.

<sup>350</sup> [Baseline Evaluation Report on Greece](#) by the Council of Europe Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO), 14 November 2023, pages 57.

<sup>351</sup> [Baseline Evaluation Report on Greece](#) by the Council of Europe Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO), 14 November 2023, pages 29- 46, 56- 57.

<sup>352</sup> [Regulatory Impact Analysis Report on the Bill on the "Interventions in the Penal Code and the Code of Criminal Procedure to accelerate and improve the quality of criminal proceedings - Modernisation of the legislative framework for the prevention and fight against domestic violence"](#).

for supervising and monitoring compliance with the terms of criminal mediation, as well as the ability to impose sanctions in cases of non-compliance

In addition, the GNCHR reiterates its *Recommendation* of April 2021 on Mediation in cases of parental disagreement, included in its *Observations on the Ministry of Justice Draft Bill, "Reforms on parent-child relations, other issues of family law and other urgent provisions"*. In this context, the National Commission recommends resolving the issues prior to and outside of Court proceedings, but only on the condition of effective victim support by mediation experts along with the simultaneous mandatory referral to specialised services involving psychologists and social workers.<sup>353</sup> In any case, the GNCHR strongly emphasises that the institution of penal mediation in incidents of domestic violence must not serve as a potential means of extinguishing the State's criminal claim against the perpetrators of domestic violence, but should rather operate under clear and strict safeguards.

In the light of the above, the GNCHR calls on the State authorities to adopt the following measures:

- 1. The National Commission urges the authorities to guarantee that mediators and all other parties involved in criminal justice follow specific guidelines and receive training with a focus on the gender perspective of domestic violence and its impact on the victims' access to a mediation process in equal terms with the perpetrator.***
- 2. Competent state authorities should guarantee the operation of an effective mechanism for supervising and monitoring compliance or non-compliance with the conditions of penal mediation and the possibility for imposing sanctions.***

## **I. Trafficking in human beings for the purpose of sexual exploitation**

Regarding the institutional framework for combating trafficking for sexual exploitation, the GNCHR in both its *Observations on the State's draft reply to the list of issues prior to the submission of the combined Eighth and Ninth Periodic Report under the Convention on the Elimination of Discrimination against Women (CEDAW)* in April 2023 and in its own Parallel Report to the CEDAW Committee in January 2024, welcomes the recent amendments to the Criminal Code introduced by Law 4619/2019 and Law 4855/2021 on the various forms of trafficking in human beings and the prescribed penalties. Developments as for example the explicit reference to all forms of trafficking in human beings in Article 323A of the Criminal Code are also in line with previous recommendations of the *Council of Europe's Group of Experts on Action against Trafficking in Human Beings (GRETA)*,<sup>354</sup> as noted by the Group of Experts notes with satisfaction. GRETA considers that the Greek authorities should take

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<sup>353</sup> *GNCHR Observations* on the Bill of the Ministry of Justice, "Reforms on parent-child relations, other issues of family law and other urgent provisions", 15 April 2021, page 5.

<sup>354</sup> See *Report* on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by Greece, 2023, pages 6, 46.

further measures to fully align Article 323A of the Criminal Code with the definition of trafficking in human beings as set out in the Istanbul Convention on Action against Trafficking in Human Beings, by clearly stating in Article 323A of the Criminal Code, that the consent of a victim of trafficking to the intended exploitation is irrelevant when any of the means are used, which would contribute to the more effective implementation of the anti-trafficking provisions.<sup>355</sup>

Following the amendment of GRETA's Rules of Procedure for the evaluation of the implementation of the Istanbul Convention, which took place in November 2014, a new Rule 7 was added, granting GRETA the right to request urgent information from the Parties when it receives reliable information indicating a situation requiring immediate intervention, in order to prevent or limit the extent or number of serious violations of the Convention.<sup>356</sup> GRETA has the authority to appoint rapporteurs to assess the specific situation and, if necessary, to carry out a visit and prepare a report. Although the Group of Experts has so far rarely resorted to this procedure, it has been applied in Greece both in 2016 and in 2024.

The GNCHR shares the positions of GREVIO in its Report to Greece, where the positive steps taken by the Greek authorities to combat human trafficking are indeed acknowledged, but also a number of weaknesses in both theory and practice are pointed out. The phenomena of incidents under-reporting and impunity of perpetrators persist. This is also exacerbated by the frequent practice of the alleged perpetrators to engage in retaliatory lawsuits, including defamation in cases of sexual violence, against women who report gender-based violence.<sup>357</sup>

The GNCHR warmly welcomed the important step of ratification of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention) by Law 4531/2018,<sup>358</sup> which **criminalises forced marriages and amended Article 323A of the Criminal Code** (trafficking in human beings) so that trafficking in human beings for the purpose of forced marriage is included.

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<sup>355</sup> [Report](#) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by Greece, 2023, pages 6, 46.

<sup>356</sup> Group of Experts on Action against Trafficking in Human Beings (GRETA), [14th General Report](#), June 2025, page 39.

<sup>357</sup> [Baseline Evaluation Report to Greece](#) by the Council of Europe Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO), 14 November 2023, paragraph 267.

According to a Press Release of 20 February 2024 issued by the Advocates of a 19-year-old woman from Elioupoli who reported a police officer in 2021, on the grounds that he was prostituting her and has already been convicted of professional human trafficking on 6 February 6 2024, criminal charges were brought against the 19-year-old for working without the required professional license and for being found in possession of drugs intended solely for her personal use during the period she was held captive. She was eventually acquitted.

<sup>358</sup> See [Observations of the GNCHR](#) on the Bill for the ratification of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence and adaptation of it, Greek legislation, 1 March 2018.

And certainly, in all its Reports, the GNCHR **warmly welcomes the establishment of the National Reporting Mechanism (EMA)** for the identification of victims of trafficking in human beings, which, in cooperation with the National Centre for Social Solidarity (EKKA), have been coordinating, since 1 January 2019, the services for the protection of victims and systematically collecting statistical data,<sup>359</sup> as well as the adoption of the *2019-2023 National Action Plan for Preventing and Combating Trafficking in Human Beings*. These are among the big steps taken by the Greek Authorities, as highlighted by the GRETA Expert Group in its second Report to Greece,<sup>360</sup> and were also included in the Recommendations in its first Report to our country. With regard to the Action Plan, apart from its 5 strategic objectives,<sup>361</sup> no information is provided on the funding,<sup>362</sup> the implementation process and the assessment of its actions. It is also noted here that there are no aggregated data available from the National Reporting Mechanism and the Greek Police on LGBTI+ persons as a particularly vulnerable category of trafficking victims.

As pointed out in the GGGOPIF 1st Annual Report on violence against Women (2020),<sup>363</sup> nor gender or domestic violence is included in the data kept by the Asylum Service on vulnerability categories. That is why vulnerability related to torture, rape or other forms of psychological, physical or sexual violence or exploitation and vulnerability related to trafficking in human beings were chosen. The GNCHR considers that measures taken to monitor and combat these phenomena, including the National Referral Mechanism (EMP) and Recommendations of the Special Secretariat for the Protection of Unaccompanied Minors, are in the right direction.<sup>364</sup>

As regards the procedure for the recognition of victims of trafficking in human beings, the GNCHR, in its *Observations on the State's draft reply to the list of issues prior to the submission of the combined Eighth and Ninth Periodic Report under the Convention on the Elimination of Discrimination against Women (CEDAW)*, shares the recent recommendations of GRETA and calls on the competent **authorities to take measures to improve the process for the**

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<sup>359</sup> [National Reporting Mechanism for the Protection of Victims of Trafficking in Human beings \(EMA\)](#)

<sup>360</sup> See Council of Europe Group of Experts on Action against Trafficking (GRETA) Second [Report](#) to Greece, 2023, paragraphs 27-30.

<sup>361</sup> The 2019-2023 National Action Plan for Preventing and Combating Trafficking in Human Beings is developed in 5 strategic axes: 1) Prevention, Awareness and Reduction of Vulnerability, 2) Education and Training of Human Resources and development of an Institutional Framework, 3) Protection, Assistance, Social Reintegration of Victims, 4) Prosecution of Human Trafficking Crimes and Administration of Justice, and 5) Promotion of cooperation among relevant national and international agencies, Source Website of the Ministry of Foreign Affairs, [Office of the National Rapporteur for the Fight against Trafficking in Human Beings \(G.ETH.EIS\)](#)

<sup>362</sup> See Council of Europe Group of Experts on Action against Trafficking (GRETA) [Second Report](#) on Greece 2023, page 9.

<sup>363</sup> General Secretariat for Family Policy and Gender Equality [3rd Annual Report on violence against Women](#), November 2020, page 43.

<sup>364</sup> General Secretariat for Equality and Human Rights [4th Annual Report on violence against Women](#), November 2023

**identification of victims of trafficking**<sup>365</sup> and in particular to ensure that this process does not depend on the complaint (statement) of the alleged victim and their cooperation in the investigation or criminal proceedings, by amending the relevant legislation. To this end, the GNCHR recommends that state authorities build on the expertise of relevant organisations and institutions, such as specialised NGOs, psychologists, health personnel and labour inspectors, in the identification process. Furthermore, the GNCHR reiterates the need to guarantee that the procedure for granting the status of victim of trafficking in human beings is completed without undue delay. In identifying victims of human trafficking for labour exploitation, it is of great importance that: **(i)** a proactive approach is followed by promoting regular and coordinated inspections in the most at-risk areas and **(ii)** and that qualified interpreters are available in interviews of the alleged victims of trafficking in human beings as part of the identification process, with costs of interpretation being covered by the authorities.<sup>366</sup>

According to the 5th Annual Report on Violence against Women, the granting of asylum to third-country nationals on the grounds of vulnerability related to human trafficking, although experiencing a significant increase, remains limited, as only 14 women were recognized as refugees.<sup>367</sup> In more detail:

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Council of Europe Group of Experts on Action against Trafficking (GRETA)<sup>365</sup> [Second Report](#) to Greece, 2023, paragraphs 159-160.

<sup>366</sup> Observations of the GNCHR on the implementation of the Convention on the Elimination of All Forms of Discrimination against Women following the drafting of the list of issues (CEDAW), 2 January 2024 paragraph 21 and 22, page 7.

<sup>367</sup> [5th Annual Report on Violence against Women](#), General Secretariat for Equality and Human Rights, November 2024, page 133ff.

### Number of asylum applications due to vulnerability related to human trafficking by gender (2018-2023, Asylum Service)

	2018		2019		2020		2021		2022		2023	
	Men	Women	Men	Women	Men	Women	Men	Women	Men	Women	Men	Women
<b>Refugee Status</b>	0	0	0	2	0	1	0	1	1	0	5	14
<b>Subsidiary Protection</b>	0	1	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	0	1	0	2	0	1	0	1	1	0	5	14

It is worth mentioning here the two following actions carried out by the GNCHR in the context of its educational mission:

- [10th Seminar of the GNCHR Third Cycle of Seminars \(Human Rights in the \(post\)epidemic era: challenges and return to “normality”\) on: "Sex work: protection of rights, legal framework and case law"](#), addressed to the wider public, held on 14.06.2021.
- A Gender Equality and Women's Empowerment Educational Action organised by the GNCHR on Sexism and Harassment in the Workplace, entitled: *Complaint and Control procedures - 3rd educational action of the GNCHR*, at the Athens Bar Association (DSA), held on 24.05.2023. The discussion was moderated by Anna Apergi, President of the Greek Transgender Support Association (SYD), Chair of the GNCHR Sub-Commission for the Promotion of Human Rights.

In light of the above, and taking into account the [2023 GREVIO Baseline Evaluation Report](#) to Greece as well as the Recommendations of the *CEDAW Committee* in its Concluding



Observations on Greece in 2024,<sup>368</sup> the GNCHR addresses the following proposals to the Greek State:

***1. The GNCHR calls on the relevant stakeholders to comply with the Recommendations made by the CEDAW Committee in its Concluding Observations on Greece in 2024,<sup>369</sup> and to address the root causes of trafficking and sex work, including poverty, in order to reduce the vulnerability of women and girls at risk of sexual exploitation and trafficking and to ensure the rehabilitation and social inclusion of victims, including by providing them with shelter and support.<sup>370</sup>***

***2. The Committee recommends focus on capacity building of judges, prosecutors, police/border police and security officers, health professionals and first aid providers in order to ensure early identification of victims of trafficking and referral to appropriate rehabilitation services. At the same time, should be trained to show respect for the specific characteristics of victims, such as age, race, colour, religion, national or ethnic origin, sexual orientation, gender identity or characteristics and disability, in the course of their duties. Especially with regard refugee women in refugee camps, it is recommended to ensure that they are provided with adequate information on their rights, as well as that civil society organisations are present during the recognition process.***

***3. The Committee further recommends the investigation, prosecution, and, where appropriate and necessary, conviction of those responsible for human trafficking, and the assurance that human trafficking cases are addressed within a reasonable timeframe, reducing the burden of lengthy procedures, accelerating the victim identification process regardless of victims' cooperation, and allowing for an adequate reflection and recovery period.***

***4. The GNCHR calls on the State to take appropriate measures to combat the exploitation of women and girls in prostitution, to prosecute and punish perpetrators, to reduce the demand for prostitution and to provide programmes for women who wish to leave prostitution, including alternative income opportunities by ensuring that women forced into prostitution can be recognised and protected as victims of trafficking. Parallel measures should be taken to increase labour inspectors and to strengthen their training.***

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<sup>368</sup> CEDAW/C/GRC/CO/8-9: Concluding Observations on the combined fourth to sixth periodic report of Greece, 19 February 2024, paragraph 26.

<sup>369</sup> CEDAW/C/GRC/CO/8-9: Concluding Observations on the combined fourth to sixth periodic report of Greece, 19 February 2024, paragraph 26.

<sup>370</sup> See CEDAW/C/GRC/CO/7 Concluding observations on the seventh periodic report of Greece adopted by the Committee at its fifty fourth session [CEDAW/C/GRC/CO/7](#), 26 March 2013, paragraphs 22, 23, d).

### *i) Sex work*

Regarding the issue of sex work, **Law 2734/1999** on *Persons providing sexual services for remuneration and other provisions*, which regulates the legal framework for sex work, establishes an outdated model with requirements that constitute clear violations of privacy and promote discrimination and violence against sex workers, such as the requirement for outmoded health examinations or the employee's marital status.<sup>371</sup> For its part, the GNCHR, in its *Observations on the 2023 State's Report* has stressed the **absence of the term "prostitution" in Law 2734/1999 on Persons providing sexual services for remuneration and other provisions**". The National Commission proposes the use of the terms "sex work" and "sex workers" instead of the terms "prostitution", "prostitute" or "provider of sexual services", as the latter terms contribute to the stigmatization of these persons, in line with the findings of long-term research on these issues conducted by the dearly departed Marina Galanou—Special Expert and Activist, President of the Greek Transgender Support Association (SYD), and member of the Commission—who also drafted a comprehensive legislative proposal to the State for the reform of national legislation in this field.<sup>372</sup>

The GNCHR further emphasized in its *Observations* the lack of expertise within the Working Group (WG) established to address challenges related to prostitution issues,<sup>373</sup> as, according to the information provided in the *State Report to the CEDAW Committee*, it was noted that five (5) out of the nine (9) members of the WG were police officers and advisors from the Ministry of Citizen Protection. As further noted by GREVIO, **harmful stereotypical behaviours are found in the prosecution services and in the judiciary**, with a possible negative impact on the decisions taken within the judicial system, regarding female sex workers in particular.<sup>374</sup>

Of particular importance is also the fact that **there is no clear distinction between "sex work" and "trafficking in human beings"**. In fact, in the Istanbul Convention, sexual work is not defined as a form of violence against women. In any case, "sex work" should not be considered *a priori* as a form of human trafficking to be criminalised, as this would have the opposite effect, i.e. people involved in such activities would be reluctant to report incidents of human trafficking.<sup>375</sup> Based on the same approach, **Amnesty International**<sup>376</sup> and

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<sup>371</sup> Greek Transgender Support Association *SYD Positions on sexual work*, 26 April 2016.

<sup>372</sup> See Marina Galanou, *Sex work, definitions, legal framework & commentary, targeted research on transgender persons, positions & proposals*, Colourful Planet, 2022.

<sup>373</sup> [Observations of the Greek National Commission of Human Rights \(GNCHR\)](#) on State's draft reply to the list of issues prior to the submission of the combined Eighth and Ninth Periodic Report under the Convention on the Elimination of all forms of Discrimination against Women (CEDAW), 9 April 2023, paragraph 139, page 16.

<sup>374</sup> [Baseline Evaluation Report to Greece](#) by the Council of Europe Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO), 14 November 2023, paragraphs 53- 160, 293, 294.

<sup>375</sup> See Marina Galanou, *Sex work, definitions, legal framework & commentary, targeted research on transgender persons, positions & proposals*, Colourful Planet, 2022, page 80.

<sup>376</sup> See Amnesty International [Amnesty International policy on state obligations to respect, protect and fulfil the human rights of sex workers](#), 26 May 2016.

**Human Rights Watch<sup>377</sup> have stressed that conflating human trafficking with sex work can lead to excessive initiatives** that may make both sex workers and trafficking victims even more vulnerable to violence and harm. At this point, the GNCHR underlines the need to ensure protection of victims of trafficking regardless of gender, sexual orientation or identity, work experience, encouraging at the same time, their cooperation with the competent authorities.



In any case, as the Council of Europe's Commissioner for Human Rights, Dunja Mijatovic, has pointed out, **sex workers are exposed to violence, and receive inadequate protection from law enforcement authorities and the judicial system.**<sup>378</sup> **Their health protection is also poor,** despite their increased health care needs. As already mentioned in many of the Commissioner's texts and reports on the right to general health, sexual and reproductive health and women's rights, sex workers face significant barriers in accessing health care.

As regards other forms of sexual abuse, the GNCHR in its *Observations on the 2023 State's Report*, acknowledges the legislative developments with regard to the criminalisation of revenge pornography (Article 346 of the Criminal Code), but considers that in practice the use of the term "pornography" is restrictive compared to the broader term "image-based sexual abuse".<sup>379</sup> Moreover, the term "pornography" does not highlight the non-consensual nature of the practices involved and therefore the term "revenge pornography" does not cover all non-consensual sharing of images or videos, precisely because not all perpetrators are necessarily motivated by revenge. This provision focuses only on a certain motive of the offender, which may be most important but not the only one. Consequently, non-consensual taking, production or supply of personal images or videos (such as upskirting) is not adequately covered by the law.

In view of the above challenges, the GNCHR proposes in particular that the following measures be taken:

**1. The GNCHR calls on the State to proceed with the revision of Law 2734/1999 on Persons providing sexual services for remuneration and decriminalise their work on a**

<sup>377</sup> Human Rights Watch: [Why should sex work be decriminalised?](#), 7 August 2019.

<sup>378</sup> Council of Europe, Commissioner for Human Rights, Dunja Mijatovic, [Protecting the human rights of sex workers](#), 15.02.2024, (Translation/Editing/Commentary: Anna Apergi Konstantinidi).

<sup>379</sup> See, [GREVIO, 1<sup>st</sup> General Recommendation on the digital dimension of violence against women](#), October 2021. In English the equivalent terms are: image-based sexual abuse / revenge pornography.

*rational basis, as a type of provision of a paid service, thus safeguarding their equal protection from discrimination and violence.<sup>380</sup> In particular, the use of the terms 'sex work' and 'sex workers' instead of the terms 'prostitution', 'prostitute' or 'providers of sexual services' should be included in the new institutional protection framework.*

*2. The National Commission recommends that the competent services facilitate access to health, medical care, and insurance coverage for sex workers, including LGBTQI+ persons, with special focus on the protection of transgender persons.*

*3. The GNCHR calls on the State to plan and implement education and training initiatives aimed at de-stigmatising sex workers and removing harmful stereotypical attitudes encountered in prosecution services and the judiciary, regarding the treatment of sex workers.*

## **J. Women migrants, refugees and asylum seekers**

Greece, as one of the most important entry points to Europe for refugees and migrants, has received over one million people since the beginning of 2015. Since the early years of its operation, the GNCHR has been closely monitoring issues related to the entry and residence of third country nationals in the country, the protection of their rights, the reception and accommodation conditions, the asylum procedures, the naturalisation policies, the detention of applicants for international protection, the integration measures, as well as specific measures for the protection of vulnerable populations, including women and children. The National Commission pays particular attention to monitoring the implementation of the legal framework governing international protection and the multiple obstacles that beneficiaries face in practice. The percentage of women and girls entering the country among migrants/refugees is estimated at around 50%. Most girls are accompanied by a family member and few of them are unaccompanied or separated from their family. **Women and girls face particular gender-related challenges and are more likely to be victims of discrimination and violence.**

In its two Reports on the refugee and migration issue, in 2019 and 2020, the GNCHR presented its comprehensive positions on all the above-mentioned specific issues emphasizing on reception and accommodation procedures, detention, pushbacks, the situation at the borders, the protection of vulnerable persons, noting at the same time the gaps in legislation and practice.

Regarding the profile of the migrant and refugee population in our country, there is little data available, recorded by the Ministry of Immigration and Asylum and the UNHCR. According to data released by the Ministry of Migration and Asylum in December 2023,

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<sup>380</sup> See Marina Galanou, Sex work, definitions, legal framework & commentary, targeted research on transgender persons, positions & proposals, Colourful Planet, 2022, page 76.

16,806 women and girls applied for asylum in 2023 (accounting for 26% of all applications).<sup>381</sup> Similarly, in 2023, 7,998 women and girls were granted positive decisions (recognising refugee status or granting subsidiary protection) in 2023 (accounting for 30.98% of all positive decisions). Moreover, in particular with regard to unaccompanied minor girls, 267 of them were granted refugee or subsidiary protection at first instance in 2023.

Similarly, during the twelve-month period of 2024, a total of 73,687 asylum applications were lodged, of which 19,278 were from girls and women (26%).<sup>382</sup> Positive decisions granting refugee status or subsidiary protection were issued to 13,295 women (33%) and 213 minor girls (21% of all positive decisions for unaccompanied minors).

For its part, the UNCHR provides regular data on the profile of the populations residing in reception centres on the East Aegean islands and the Dodecanese. Indicatively, at the beginning of 2024, a total of 15,859 refugees and migrants were residing in the Closed Controlled Island Facilities, of whom women accounted for 18% and children 24% (including girls among them).<sup>383</sup>

As pointed out by the GNCHR in previous reports, despite the improvement of living conditions at the borders, the **new model of "Controlled Access Reception Centres" does not provide a suitable environment for vulnerable persons, such as women with children**,<sup>384</sup> as also highlighted by the [European Court of Human Rights](#) in a recent interim order.<sup>385</sup> Regarding the living conditions of women asylum seekers in accommodation centres in mainland Greece, single mothers, married or divorced women from Afghanistan testify that they experience severe loneliness and face practical and financial constraints and difficulties due to lack of access to public services, transport and legal assistance.

In 2020, the Greek National Commission for Human Rights (GNCHR) conducted a visit to Samos, during which it identified deeply concerning incidents of violence against women (including domestic violence, rape of [women](#)<sup>386</sup> and girls, extortion by smugglers, and acts of human trafficking) as well as a broader sense of insecurity that significantly restricted the freedom of movement of the female population. These incidents were never formally reported or documented, primarily due to the absence of an adequate support framework (e.g., shelters for victims outside the Reception and Identification Centres) and the lack of institutional mechanisms facilitating victims' access to justice (such as the provision of

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<sup>381</sup> 5,545 out of them were minors. See Information Note to the International Protection [Annex A](#), December 2023.

<sup>382</sup> [Information Note](#), December 2024.

<sup>383</sup> UNCHR Greece, [Aegean Islands: Weekly Statistical Review](#), 15-21 January 2024; UNCHR Greece, [Aegean Islands Weekly Statistical Review](#), 26 May - 01 June 2025

<sup>384</sup> Noteworthy is the relevant warning letter of the European Commission, [January infringements package: key decisions](#), January 26, 2023. See also [GNCHR Report on the refugee and migration issue](#), part B, 24 September 2020, pages 39, 46, 96.

<sup>385</sup> European Court of Human Rights [A.D. v. Greece](#) (no. 55363/19), 4.4.2023, case A.D. Greece (no. 55363/ 19)

<sup>386</sup> GNCHR [National Report on the situation of human rights of migrants at the borders](#), July 2021.



interpretation services in Police Departments and Hospitals). On **6 and 7 February 2024**, the GNCHR conducted a **new visit to Samos** to investigate the reception conditions for applicants for international protection at the border,<sup>387</sup> in light of increasing reports regarding shortcomings in the protection of the accommodated population particularly with respect to their access to healthcare services.<sup>388</sup> During the visit, an on-site inspection was carried out at the premises of the Closed Controlled Access Centre, and meetings were held with the heads of the reception and asylum offices, security forces, health service providers and organisations, as well as with representatives of international organisations, non-governmental organisations, and civil society actors operating in the field, both inside and outside the facility. It is with regret that the GNCHR found that the number of persons residing in the Centre, systematically since September 2023, **exceeds the capacity of the Centre, failing to safeguard any privacy and security**, as single men, single women and families with children are all living in a single room. The Commission also remains extremely concerned about the **low level of health services provided to those accommodated in the Centre, including elderly persons, children and women victims of violence**.

On 23 October 2024, a GNCHR delegation also visited the Controlled Access Facility for Temporary Accommodation of Asylum Seekers in Ritsona to examine the reception conditions for individuals seeking international protection.<sup>389</sup> The total population residing at the facility is 1,685 people, of whom 949 are men (56%), 462 women (28%), 149 boys (9%), and 125 girls (7%). In addition to understaffing, particularly regarding health services, and the difficult integration with the urban environment, a lack of a safe, female-friendly space was also observed—previously operated as a UNHCR programme. The GNCHR once again emphasized the need for the necessary safeguards regarding the reception in order to ensure appropriate protection for individuals based on their vulnerability, including, among others, victims of torture, victims of human trafficking, and victims of gender-based violence.

Under the EU law, women are usually considered as 'vulnerable' and therefore their specific needs must always be taken into account by the public authorities. Moreover, according to a constant *Recommendation* of the GNCHR, it is of crucial importance to **identify and distinguish persons seeking for international protection or belonging to vulnerable groups and to ensure decent reception conditions for all**. In 2016, Law 4375/2016 introduced the establishment of Reception and Identification Centres (RICs), responsible for assessing the vulnerability of persons in need of international protection under *Directive 2013/33/EU of the European Parliament and of the Council of 26 June 2013 laying down*

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<sup>387</sup> On-site visit of the GNCHR in Samos: Reception conditions at the Closed Controlled Access Centre (KED) of Samos do not comply with the basic standards, 9 April 2024.

<sup>388</sup> See for example, [Joint Letter of organisations](#) promoting the Creation of a Safe Space for single women within the new centre, 17.9.2021, Greece: In the midst of increased arrivals, [Doctors without Borders](#) are recording significant gaps in the asylum seekers' access to health services in Lesbos, 01.09.2023.

<sup>389</sup> [GNCHR on-site visit to the Controlled Access Facility for Temporary Accommodation of Asylum Seekers in Ritsona: A remote accommodation with lack of reception guarantees](#), October 2024



*standards for the reception of applicants for international protection (recast)* The measure has never been effectively implemented. Subsequently, Law 4636/2019, which replaced it, also included detailed provisions for vulnerable persons, although in substance, it was also not successfully implemented. Finally, the more recent Law 4939/2022 <sup>390</sup> on the protection of particularly vulnerable asylum seekers (*Articles 21-25 of Directive 2013/33/EU, Articles 62-67 of the Law*), explicitly stipulated that gender is a factor to be taken into account with regard to reception conditions and procedural guarantees in asylum procedures. In practice, the amendments to Law 4636/2019, introduced by Law 4939/2022, <sup>391</sup> although limiting guarantees for the protection of vulnerable categories of third-country nationals, in practice the State, taking into account the severe pressure at the borders due to the steady increase in flows, indicate that in the mainland relocation operations, usually prioritises vulnerable persons. As highlighted by the GNCHR in its two Reports with regard to the Covid-19 pandemic, in June 2020 and May 2021 (Reference Report), the relocation of vulnerable people in the mainland during the pandemic took place in a coordinated and transparent manner, prioritising unaccompanied minors and families with vulnerable members. It is reiterated that the GNCHR, in all its reports and inputs, called for the abolition of administrative detention for vulnerable persons, including families with young children, as it disproportionately affects their rights.

It is worth noting that since 2022, the EEA, together with the Office of the UN High Commissioner for Refugees in Greece (UNHCR), established a [Recording Mechanism of Informal Forced Returns](#), building on the experience gained by the Commission since its establishment in 2011 and the 12 years of operation of the [Racist Violence Recording Network](#).<sup>392</sup> In its first year of operation, the Mechanism has recorded 50 incidents of informal forced returns that allegedly occurred between April 2020 and October 2022. These incidents are substantiated by 58 personal testimonies collected through individual interviews with 43 alleged victims. Among them, 26% are women (11 out of 43).<sup>393</sup> Testimonies about alleged informal forced returns of women migrants who entered the Greek territory during the same period are also included in other recent reports (Doctors Without Borders (Médecins Sans Frontières),<sup>394</sup> Danish Refugee Council)<sup>395</sup>. According to

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<sup>390</sup> Law 4939/2022 *Ratification of the Code of Legislation concerning the reception, international protection of third-country nationals and stateless persons, and temporary protection in the event of a mass influx of displaced foreigners*.

<sup>391</sup> [Law 4939/2022](#) “*Ratification of the Code of Legislation concerning the reception, international protection of third-country nationals and stateless persons, and temporary protection in the event of a mass influx of displaced foreigners*.”

<sup>392</sup> The [Racist Violence Recording Network](#) is an initiative of the National Commission for Human Rights and the Office of the United Nations High Commissioner for Refugees (UNHCR) in Greece and is composed of bodies who provide legal, medical and social services to the victims of racist violence or other hate-motivated attacks, or who come into direct contact with them. The Network currently consists of 52 NGOs and 2 observers.

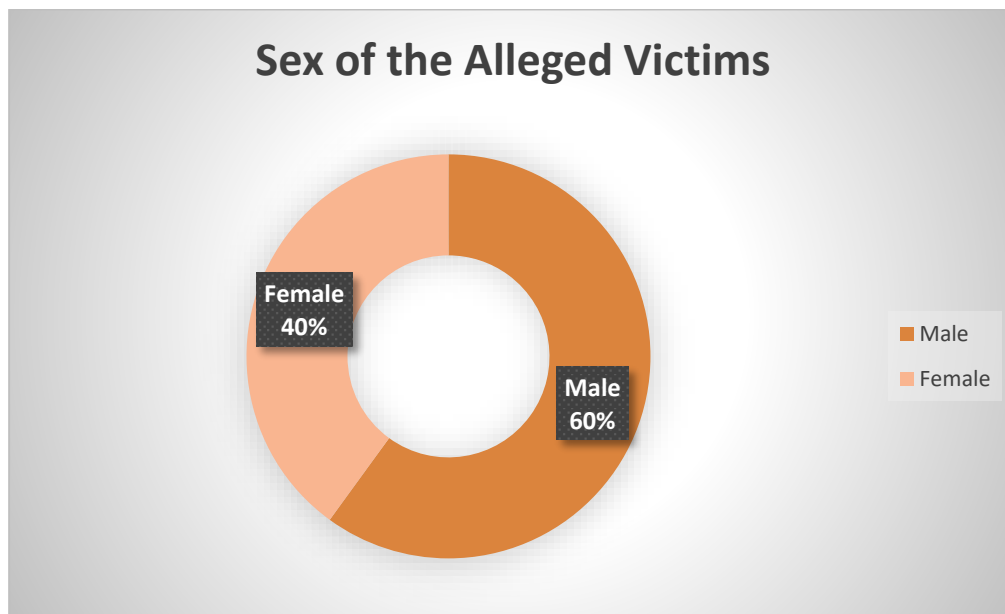
<sup>393</sup> [Recording Mechanism of Informal Forced Returns, 2022 Annual Report](#).

<sup>394</sup> Doctors without Borders ((Médecins sans frontières), [In plain sight: The human cost of migration policies and violent practices at the Greek maritime borders](#), November 2, 2023.

<sup>395</sup> DRC, Protecting Rights At Borders, [Overview 2021](#).

testimonies, the total number of the alleged victims involved in the incidents, amounts to at least 2,157 people, including 214 women and 205 children, as well as persons with disabilities, including those with medical problems, elderly people, etc.

Similarly, the third Annual Report of the Mechanism for Recording Incidents of Informal Forced Returns concerns 52 incidents of pushbacks, which, according to the claims of the alleged victims, occurred between January 2022 and December 2024. For these 52 incidents, the Recording Mechanism collected 61 testimonies through personal interviews with 44 individuals who claim to be victims of these incidents and 1 individual who was an eyewitness to an incident.<sup>396</sup> Of the 52 incidents recorded by the Mechanism, 35 involved physical removal via the sole land border between Greece and Turkey, the Evros River, while 17 incidents involved physical removal from the maritime borders. Of the total of 45 alleged victims, 27 are men and 18 are women.<sup>397</sup>



<sup>396</sup> The testimony was exceptionally recorded outside the methodological rule of collecting testimonies through personal interviews with the alleged victims, as it meets the conditions required by the Recording Mechanism for such testimony: (a) due to force majeure, the alleged victim is unable to participate in the relevant interview (in this case, the individual is imprisoned in a high-security (Type L) prison); (b) the person providing the testimony is reasonably in a position to justify knowledge of the incidents (in this case, the interviewee is the son of the alleged victim and, through subsequent communication with the victim, became informed of the incidents); and (c) the testimony is corroborated by direct testimony of another alleged victim of the same incident (in this case, the interviewee was also a victim of the same incident).

<sup>397</sup> 3rd Annual Report of the Mechanism for Recording Incidents of Informal Forced Returns, 1<sup>st</sup> Chapter, June 2025.



Finally, in its *Memorandum to the Committee on the Preparation of the National Strategy for LGBTQI+ persons* in June 2021, the GNCHR indicates that LGBTQI + asylum seekers, remain among the most invisible applicants in the European asylum systems. They face significant obstacles during the procedures for determining international protection status, while also being confronted with negative stereotypes and prejudices associated with LGBTQI+ identities.<sup>398</sup> In order to be granted asylum, LGBTQI+ asylum seekers bear the burden of proving their sexual orientation, expression, gender identity or gender characteristics when these are linked to a ground of persecution in their country of origin, before the national asylum authorities and the judicial authorities (if the case is brought before the courts). The GNCHR has in the past underlined the need to treat them in a particular way, reiterating that persons in need of special reception conditions should include LGBTQI+ persons, who should be identified by the reception services and properly accommodated in reception and accommodation facilities, in light of the heightened and well-documented risks faced by these individuals and their communities<sup>399</sup> and for whom specific measures should be taken.<sup>400</sup>

<sup>398</sup> SYD, [LGBTQI+ refugees in Greece](#): The EU-Turkey agreement and beyond.

<sup>399</sup> GNCHR [Observations](#) on the Bill of the Ministry of Citizen Protection "About International Protection: provisions on the recognition and status of third country nationals or stateless persons beneficiaries of international protection, on a uniform status for refugees or for persons entitled to subsidiary protection and on the content of the protection granted, unification of provisions on the reception of applicants for international protection, the procedure for granting and withdrawing international protection status, judicial restructuring of the protection of asylum seekers and other provisions", 24 October 2019, pages 18-19, GNCHR, [Information](#) on the implementation of the Convention against torture and other cruel, inhuman or degrading treatment or punishment (UNCAT). Submission to the UN Committee against Torture in response to the list of issues regarding the report of Greece, 14 June 2019, page 31. See also the European Parliament Recommendation in, European Parliament, Committee on Women's Rights and Gender Equality [Report on the situation of women refugees and asylum seekers in the EU](#), 2015/2325 (INI), 10 February 2016.

<sup>400</sup> GNCHR, [Information](#) on the implementation of the Convention against torture and other cruel, Inhuman or degrading treatment or punishment (UNCAT). Submission to the UN Committee against Torture in response to the list of issues regarding the report of Greece, 14 June 2019, page 31. See the European Parliament Recommendation in, European Parliament, Committee on Women's Rights and Gender Equality [Report on the situation of women refugees and asylum seekers in the EU](#), 2015/2325 (INI), 10 February 2016.

In view of the challenges faced by LGBTQI+ applicants for international protection or LGBTQI+ persons already granted the relevant status, the GNCHR proposes in particular the adoption of the following measures:

***1. The GNCHR calls on the competent state authorities to ensure that all migrants and asylum seekers entering or residing in Greece are thoroughly informed about their rights. Specific measures should be taken to protect vulnerable populations, including women and girls.***

***2. The GNCHR, aware of the needs of migrant and refugee women in Greece, recommends that the State: i) increase accommodation capacity in mainland Greece, by establishing facilities suitable for the long-term stay of applicants for international protection, with particular attention to families and women ii) strengthen the urban housing programme, especially for vulnerable groups and those residing in unsuitable facilities, in cooperation with UNHCR in Greece and with a view to gradually accommodating all asylum seekers iii) take measures to protect vulnerable categories of women, such as their immediate transfer to open reception facilities where they can receive appropriate care and support that meet their specific needs***

***3. The GNCHR urges the competent authorities and stakeholders to put emphasis on the detection/identification of victims of smuggling and trafficking in human beings among migrants and asylum seekers in reception centres and persons detained as irregular migrants and to provide continuing training to all employees who come in contact with these persons.***

***4. The GNCHR calls on the Greek State and the EU to integrate the dimension of disability into their migration and asylum policies in order to ensure the protection and safety of women and children with disabilities in accordance with the UN Convention on the Rights of Persons with Disabilities.***

***5. Taking into account the challenges faced by LGBTQI+ refugees and asylum seekers, the GNCHR recommends that the Greek authorities proceed with the adoption of measures concerning the: (i) reception of refugees with respect for their sexual orientation, gender expression, gender identity, gender characteristics (ii) provision of continuing training for staff coming into contact with LGBTQI+ applicants (iii) individualised examination of each application, including those considered to arrive from safe countries, allowing an expert from LGBTQI+ society to be present during asylum interviews iv) the inclusion, among the criteria for cases of trans individuals, of cohabitation with persons of the same gender identity and v) ensuring that trans refugees have access to trans immigration procedures.***

***6. The GNCHR calls on the state authorities to respond to the CEDAW Committee's request for "data on the number of migrant women employed as domestic workers and on the measures taken to ensure that they enjoy the same level of protection and***

*benefits as other workers", as well as on "the measures taken to ratify the International Labour Organisation (Convention No 189)" on the protection of domestic workers."*

*7. The GNCHR recommends the financial and logistical support and the expansion of social integration policies and programmes, so as to include all recognized beneficiaries of international protection, with the aim of equipping them with the appropriate skills and knowledge to genuinely enjoy equal opportunities with Greek citizens in terms of employment and independent living.*

### **K. Women, climate change and social justice**

Recognizing the undeniable connection between fundamental rights and environmental protection, the GNCHR reiterates the need to ensure the protection of the environment as a human right, especially in today's global context, where climate change seems to threaten basic social rights, a fact also highlighted by the UN High Commissioner for Human Rights.<sup>401</sup> In this light, the GNCHR seeks to systematically communicate and cooperate with bodies and organisations active in the field of environmental protection in our country, in order to be informed about their positions and initiatives and to benefit from them positively in the context of its mission and its advisory role to the State. It is worth noting that under the new Law 4780/2021, establishing the GNCHR, for the first time in its twenty (20) years of operation, **a person designated jointly by Greenpeace and WWF participates in the Plenary of the National Committee with voting rights.**

In the [Memorandum](#) of July 2022, submitted by the GNCHR on the discussion and adoption of the Draft Bill of the Ministry of Environment and Energy "*Provisions for the simplification of environmental licensing, establishment of a framework for the development of Offshore Wind Farms, addressing the energy crisis, environmental protection and other provisions*", **issues concerning the harmonisation of the national institutional framework for the environmental protection with the EU and international law were raised** such as Greece's compliance with the judgement of the Court of Justice of the European Union (C-849/19) for inadequate protection of the Natura 2000 protected areas <sup>402</sup> under the Council Directive 92/43/EEC of 21 May 1992 on the *conservation of natural habitats and of wild fauna and flora*, as well as **compliance with Directive 2011/92/EU** of the European Parliament and of the Council of 13 December 2011 on *the assessment of the effects of certain public and private projects on the environment (codification)* which provides, *inter alia*, that: "*Member States shall ensure that the competent authority or competent authorities, in carrying out the tasks under this Directive, are not in conflict of interest*" (Article 9a).

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<sup>401</sup> [Open letter](#) from the United Nations High Commissioner for Human Rights on priorities for human rights-based climate action at the 28<sup>th</sup> Conference of the Parties to the United Nations Framework Convention on Climate Change, November 2023.

<sup>402</sup> [Judgment](#) of the Court of Justice of the EU in case C-849/19 (17.12.2020)



Sensitive to the differentiated impacts of environmental issues on women and men, the GNCHR expresses its deep concern about the ways in which gender inequalities undermine women's ability to respond to these threats, given that **women are among the first vulnerable groups to be affected by any crisis, such as climate change**. In particular, women often suffer from a lack of resources, technology, lifelong education, which would help them adapt to climate change, and they are vulnerable to phenomena such as physical, mental and economic violence increasing as a result of the climate crisis. This situation is even more acute when it comes to vulnerable categories of women, such as women with disabilities, migrant/refugee women, Roma women, elderly women. According to the EIGE, women, young people and all vulnerable groups should be fully included in our climate policies.<sup>403</sup> It is argued that "*beyond being victims, women can also be active agents and vocal supporters of the global movement against environmental degradation*."

One of the environmental initiatives undertaken by the GNCHR in 2023 in support of social justice and environmental protection was the hosting of members of *Klimaseniorinnen* — a group of women over the age of 64 from Switzerland — in collaboration with the Hellenic office of Greenpeace (January 2023).<sup>404</sup>

**Special mention should be made of the decision by the *KlimaSeniorinnen*, through their organization 'Climate Seniors Association', to bring a case in 2020 before the European Court of Human Rights against the Swiss government, seeking action against the climate crisis in order to safeguard their rights, arguing that **elderly women are disproportionately affected by the impacts of climate change**.**<sup>405</sup> The ECtHR was called upon to play a "*quasi-legislative role*" and make a clear statement on the obligations of member states regarding climate change, which are regulated in other international instruments. Indeed, the outcome of the *KlimaSeniorinnen v. Switzerland* case is **a milestone in safeguarding the rights enshrined in the European Convention on Human Rights with regard to Climate change**.<sup>406</sup> The Court held that the right to respect for private and family life (Article 8 of the ECHR) and the right to a fair trial were violated (Article 6 of the ECHR). This is a groundbreaking judgment, which makes it clear that **member states have an obligation to effectively combat climate change** in order to protect human rights. The *KlimaSeniorinnen* initiative will hopefully serve as an example in this direction.

The decision **was welcomed by the GNCHR and of course by the European Network of National Human Rights Institutions (ENNHRI)**, a member of which is also the GNCHR, and which in September 2021 and December 2022, brought a third-party intervention through

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<sup>403</sup> EIGE Article, "Make 2024 the year you commit to a green and gender-equal Europe", 17 January 2024.

<sup>404</sup> See GNCHR Press Release "[Breaking the age stereotypes about activism: \*KlimaSeniorinnen\* in Greece](#)", January 30, 2023.

<sup>405</sup> In the *KlimaSeniorinnen v. Switzerland* case, applicants invoke a violation of Articles 2, 8, 6 and 13 of the ECHR, namely their rights to life, respect for private and family life, a fair trial and an effective remedy.

<sup>406</sup> *Verein KlimaSeniorinnen Schweiz and Others v. Switzerland*, Judgement of 9 April 2024, Application no. 53600/20.



written observations before the ECtHR (first to the Chamber and then to the Grand Chamber), arguing for the responsibility of states to effectively safeguard the human rights enshrined in the ECHR against the harmful effects of climate change.<sup>407</sup>

The *CEDAW Committee* in its 2024 *Concluding Observations* acknowledges that gender mainstreaming has been integrated in the design of environmental and climate policies in Greece, but it is concerned that **women, in particular women farmers, women with disabilities, women living in poverty and migrant women, are disproportionately affected by climate change**, as they often live in areas at risk and lack the necessary coping mechanisms to increase their resilience to climate change.<sup>408</sup>

This is in line with both the *report of the UN Special Rapporteur, David R. Boyd, on the issue of human rights obligations relating to the enjoyment of a safe, clean, healthy and sustainable environment*<sup>409</sup> as well as the *report of the UN Special Rapporteur, Ian Fry, on the promotion and protection of human rights in the context of climate change*.<sup>410</sup> In particular, special emphasis is placed on the vulnerability of women to the adverse effects of climate change and the need for equal participation of women in the decision-making process to address climate change.

Furthermore, the **2023 EIGE Annual Report on the Gender Equality Index introduces the European Green Deal as a key theme**, underlining the need to address gender inequalities both in the context of the Fair Transition as well as in the decision-making field.<sup>411</sup> Indicatively, in 2022, only 22% of the decision-makers in parliamentary committees focused on environmental and climate change issues were women.<sup>412</sup>

Similarly, Recommendation CM/Rec(2022)20 of the Committee of Ministers of the Council of Europe to member States on human rights and the protection of the environment highlights the **vital role of equality and women's empowerment in relation to the environment and sustainable development**.<sup>413</sup>

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<sup>407</sup> ENNHRI News *The Grand Chamber of the European Court of Human Rights issues groundbreaking judgment on climate change and human rights*, 12 April 2024.

<sup>408</sup> See UN CEDAW/C/GRC/CO/8-9: Concluding observations on the combined fourth to sixth Periodic Report of Greece, 19 February 2024, paragraph 45-46.

<sup>409</sup> Report of the UN Special Rapporteur on human rights obligations relating to the enjoyment of a safe, clean and sustainable environment, David R. Boyd, entitled "[A/HRC/52/33: Women, girls and the right to a clean, healthy and sustainable environment - Report of the Special Rapporteur on the issue of human rights obligations relating to the enjoyment of a safe, clean, healthy and sustainable environment](#)", 5 January 2023.

<sup>410</sup> Report by UN Special Rapporteur on the promotion and protection of human rights in the context of climate change, Ian Fry, [A/78/255: Report of the Special Rapporteur on the promotion and protection of human rights in the context of climate change](#), 28 July 2023, paragraphs 68-70.

<sup>411</sup> Gender Equality Index 2023 [Towards a Green transition in Transport and Energy](#), pages 52, 54

<sup>412</sup> Gender Equality Index- [Country Profile Factsheet 2023](#))

<sup>413</sup> [Recommendation CM/Rec\(2022\)20](#) of the Committee of Ministers to member States on human rights and the protection of the environment, 27 September 2022.

In the context of its mission, the National Commission seeks to raise awareness of civil society on gender equality issues through the dissemination in the media, its website and social media (twitter and facebook). You can read below the relevant actions of the GNCHR:

- Participation of the GNCHR in a conference of the National Hellenic Research Foundation and WWF Greece: "*The road to achieving climate neutrality*", which was attended by its members with voting rights, jointly designated by Greenpeace and WWF, on 22 November 2023
- Event on the climate crisis jointly organised by Greenpeace and the GNCHR at the Goethe Institut Athen entitled, *The Climate Movement, Vulnerable Groups and Human Rights, with guests KlimaSeniorinnen*, on 27 January 2023.
- **9th Seminar** of the GNCHR on **The Right to Environment** with speakers the President of the GNCHR, Professor Maria Gavouneli and Emmanouela Doussi, Professor of the School of Economics and Political Sciences of the National and Kapodistrian University of Athens, on 7 June 2021.
- Participation of the President of the GNCHR, Professor Maria Gavouneli, in the web event of the British Embassy and WWF on climate legislation in Greece, on 20 July 2021.

Taking into account the gender dimension of the challenges faced by women in the context of climate change, and in particular General Recommendation No. 37 (2018) of the CEDAW Committee on the gender-related dimensions of disaster risk reduction in the context of climate change, the GNCHR recommends the adoption of the following measures, in line with the Recommendations addressed by the CEDAW Committee to Greece in its Concluding Observations of 2024:<sup>414</sup>

***1. The GNCHR calls on the relevant state authorities to review their climate change and response to natural disasters strategies, taking into account the negative impacts of climate change on women's livelihoods and ensuring that women are represented on an equal level with men, in the development, establishment and implementation of legislation, policies and programmes on climate change, disaster response and disaster risk reduction, in particular through:***

***(a) Collecting aggregate data on the impact of climate change and natural disasters on women and girls***

***(b) Ensuring the integration of a gender dimension into legislation, policies, funding and programmes to address the specific needs of women and girls and strengthen their resilience to climate change***

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<sup>414</sup>CEDAW/C/GRC/CO/8-9: Concluding Observations on the combined fourth to sixth periodic report of Greece, 19 February 2024, paragraph 45-46.

***(c) Enhancing literacy and raising awareness about climate change among communities of women and girls, including women living in rural areas and women with disabilities, in order to empower them to claim their rights and actively participate in decision-making processes in this regard.***

