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EUROPEAN SOCIAL CHARTER

Observations of the Greek Government on the
comments from the
Greek National Commission for Human Rights
on the
21st National Report on the implementation of
the European Social Charter

submitted by

THE GOVERNMENT OF GREECE

(Articles 7, 8 and 17
for the period 01/01/2003 – 31/12/2009;
Articles 16 and 19
for the period 01/01/2005 – 31/12/2009)

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Comments on the 21st Greek Report on the implementation of the European Social Charter

On page 2, of the comments of the National Commission for Human Rights, the 2nd par. "Under Article 44 par. 1 of Law 3386/05 as amended by Law 3875/2010… …they cooperate with the prosecutorial authorities", should be amended as following: [1] "Through law 3386/05 (articles 46 to 52) on the entry, residence and social integration of third country nationals in the Hellenic Territory (Official Gazette A/212/23.8.05) the Directive 2004/81/EU on trafficking has been transposed in national law".

Also, the law 3875/2010, which ratified the United Nations Convention against Transnational Organized Crime and its three Protocols (the Palermo Convention) amended the provisions of law 3386/05 in order to expand the protection of the trafficking victims (art 46-52 of law 3386/05). In addition the protection of law has been broadened also to victims of migrant smuggling (art 46-52 of law 3386/05).

Furthermore, following a recent amendment of law 3386/2005 by law 3907/26.11.2011 *"Establishment of an Asylum Service and of a First Reception Service and transposition into Greek legislation of the provisions of the Directive 2008/115/EC on common standards and procedures in Member States for returning illegally staying third-country nationals"*, the **victims of trafficking who do not cooperate with the authorities** are also entitled to a **residence permit on humanitarian grounds**, if they are recognized, by act of the competent prosecutor's office, as victims of trafficking in human beings (art. 44 par. 1 of law 3386/05).

Special care is provided for minors-victims of trafficking in human beings or smuggling of migrants who are unaccompanied minors. Thus the competent authorities should take the necessary measures in order to establish their identity and nationality and the fact that they are unaccompanied. They also make every effort to locate their families as quickly as possible and take the necessary steps immediately to ensure their legal representation including representation in criminal proceedings.

Third country nationals, recognised as **victims of trafficking** or **victims of smuggling**, are granted a **residence permit upon decision of the Minister of Interior, Decentralization and E-Government** (art 46-52 of law 3386/05) without any obligation to pay the fee. This permit is of one year duration and renewable until the issuing of a court decision.

Both above mentioned residence permits are issued without any obligation to pay the fee. They assign the right to health care and access to the labour market, only for the period of their duration, according to the law. Both permits may be renewed by decision of the General Secretariat of the relevant Decentralized Administration.

[1] For more details, please refer to the codification of migrant's legislation in our website: www.ypes.gr (English version).

Furthermore, on page 3§1, regarding the decrease in the protection level of maternity, paternity and of the family, due to the new institutional framework concerning the special enterprise agreements, we would like to stress that in our country the provisions 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 – Compliance of the legislation in force with Directive 2006/54/EC of the European Parliament and the Council dated July 5th 2006 and other relevant provisions" are applied; these constitute the legal protection for women as well as for men with a view to preventing and tackling any direct or indirect discrimination against a working person on grounds of sex or marital status. By means of the provisions of the above said Law, Directive2006/54/EC, which complies with the rest of our country's international commitments to these issues, has been transposed into our national legislation.

Also, the institutional framework of our country concerning maternity protection and the granting of maternity leave, is strong and based on law provisions (article 11 of Law 2874/2000, which ratified article 7 of the National General Labour Collective Agreement (EGSSE) for the years 2000-2001, on article 15 of Law 1483/1984, etc) and Presidential Decrees (P.D.176/1997, P.D.41/2003) and therefore, is not affected by the new institutional framework of the special enterprise agreements.

On page 3§2 and on page 5§3 we would like to note that the institutional framework for the granting of parental leave complies with the provisions of Directive96/34/EC to which a relevant framework agreement of the European social partners is annexed. The said framework agreement provides for the minimum requirements for this issue, imposes the obligation concerning the autonomous and non-transferable parental leave right, but it does not provided for the payment of remuneration.

Our national legislation is in compliance with the provisions of the above directive, by means of articles 5 and 6 of Law1483/1984 as amended by article 25 of Law 2639/1998 and in force. More specifically, the following are in force:

Working parents are entitled to unpaid leave of 3 ½ months' duration and up to the date on which their child reaches the age of three and a half, on condition that they are employed with the same employer for one year. As far as single parent families are concerned this leave can be of up to six months' duration. Workers who have adopted a child are also entitled to this parental leave. In case the family has more than one children, the parents are entitled to this leave for each one of their children, on condition that one year of actual employment with the same employer has passed since the end of the parental leave granted for the previous child.

The working parent, to whom parental leave for the bringing up of his/her child is granted, during the period in which he/she is absent from work, is entitled to insurance coverage by his/her social insurance body and is obliged to pay the whole amount of his/her insurance contribution, i.e. the contribution paid by both the employer and the worker, which corresponds to

this period of time. The period of absence from work is taken into account both for the establishment of the insurance right and for the increase in the amount of the pension.

Following the end of the parental leave for the bringing up of his/her child, the worker is entitled to return to his/her work, to the same or similar post, which in no case can be lower than the one he/she had been placed before the granting of the parental leave for the bringing up of his/her child. Finally, the termination of the labour contract which is due to the exercise by the worker of his/her right to the parental leave for the bringing up of his/her child is null and void.

On page 4§2 regarding the scope of application of article 142 of Law 3896/2010, we would like to stress that by means of the provisions of the said article the special provision for maternity protection has been established, in the form of leave, which is granted to working women at the end of the maternity leave or/and the leave which is equal to the reduced working hours, according to article 9 of the EGSSE for the years 2004 – 2005. It is of six months duration, while the working mother is subsidized and covered by the OAED as far as the social insurance is concerned based on the minimum wage each timed determined by the EGSSE.

Pursuant to the above provision "a mother insured with the IKA-ETAM and bound by a working relationship for a definite or an indefinite period of time in enterprises or undertakings, following the end of the after confinement leave or/and the leave which is equal to the reduced working hours, provided for by article 9 of the EGSSE for the years 2004-2005" is entitled to the special provision for maternity protection.

Also, decisions No33891/606/7-5-2008 and No26637/1050/3-9-2009 of the Minister of Employment and Social Protection have regulated the procedure, the manner and the rest of conditions as well as any other detail necessary for the application of article 142 of Law 3655/2008.

Concerning the scope of application of the above regulation, the opinion No365/7-7-2008 was issued by the Legal Adviser's Office of the Minister of Employment and Social Protection that was approved by the Minister at the time. This opinion clarifies who are the beneficiaries of this special provision for maternity protection while at the moment the Greek Parliament is passing a relevant clarifying provision.

On page 5§2, we would like to stress that the Independent Authority of the Greek Ombudsman, which fully complies with the independence criterion imposed by Directive54/2006, since 2006 initially, by virtue of the provisions of article 13 of Law 3488/2006 and onwards pursuant to article 25 of Law 3896/2010, has been defined and operates as the sole national competent authority to promote and supervise the application of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation, in both the public and the private sector, while by virtue of the recent law its tasks and mission are enhanced and safeguarded.

More specifically, and only as far as the private sector is concerned, pursuant to para10 of the same article, a special cooperation scheme has been determined between the Greek Ombudsman and the Labour Inspectorate, so that, in case of complaints and labour disputes, the inspection procedure and the imposition of sanctions entrusted to the local labour inspection services which are responsible by field of knowledge, might be facilitated.

In accordance with the above mentioned provision, the Labour Inspectorate continues to be entrusted with the inspection and the imposition of sanctions in case of violation of legislation, having been obliged with the provision of information to the Greek Ombudsman about any complaint lodged to it, concerning the application of the above Act, and the communication of the outcome of the inspection it has carried out.

In all cases, the Greek Ombudsman is entitled to carry out its own inspection, to play its role of mediator with a view to eliminate discriminatory treatment on grounds of sex and to come to its own conclusion which, given the Ombudsman's mission and duties, is of great importance for the Labour Inspection Services, for the imposition of fines and the drawing of the final conclusion.

Finally, we would like to note that, the Greek Ombudsman participated actively in the law-making process of Law 3896/2010, as well as of the repealed Law 3488/2006. The relevant cooperation fully satisfies the Independent Authority as well, which encourages such cooperation.

Moreover, regarding page 8 of the observations of the National Commission for Human Rights, we consider that the observations concerning paras2 and 3 are wrong and they do not correspond to the existing legislative framework provided for by Law 3500/2006, since, in accordance with article 8§1 thereof, the crime of rape committed between persons referred to in article 1 of the same Law, is criminally prosecuted.

According to article 1 of Law 3500/2006 the commitment of a criminal offence against a family member is considered to be domestic violence. Blood relatives or relatives by marriage of up to the fourth degree and persons for whom a member of their family has been appointed as their guardian or legal representative or foster parent as well as every minor on condition that all of them live with each other, belong to the same family. The provisions of the above Law also apply to the permanent partner of a man or a woman and to the children that they have had together or whose parent is one of them, as well as to the former spouses, provided that these persons live together.

Furthermore, it's worthwhile mentioning that, in the years 2007-2009, the Hellenic Police Services were informed about and looked into 41 cases of rape in total, within the framework of application of Law 3500/2006 on "Tackling domestic violence and other provisions".

Finally, concerning the Labour Inspectorate Body (SEPE) operation we would like to inform you that the SEPE constitutes the major control mechanism of the Ministry of Labour and Social Security for supervising the application of the labour law. According to article 6 of Law 2639/1998 the SEPE has, inter alia, the following duties:

1. to supervise the application of the labour law provisions,

2. to investigate, observe and prosecute the persons who violate the labour law,

3. to investigate, observe and prosecute, together with and separately from the police, persons employing illegal workers,

4. to investigate, together with and separately from the insurance bodies, workers' social insurance coverage.

The Law by means of which the SEPE was established provides for that one of the SEPE duties is "to investigate, together with and separately from the insurance bodies, workers' social insurance coverage". When, during investigation, uninsured workers, Greeks or migrants, who legally reside in our country and have a work permit, are observed, the SEPE inspectors inform the competent IKA services so that the latter might take the necessary actions.

Until recently the said actions are also taken for illegal immigrants who reside in the country either illegally or legally but have not been granted a work permit (for example in case of tourist visas). In these cases the SEPE services used to inform the Region, so that the latter might impose legal sanctions (fine or closure of the undertaking). Today, following the recent amendment of article 86 of Law 3386/2005 by article 14 of Law 3846/2010 when the SEPE Inspectors observe illegal employment of migrants then they themselves impose the fine and at the same time inform the Region for any further action.

Since the beginning of 2010, the provision of article 151 of Law 3655/2008 has entered into force and, now, regular inspections are carried out by joint working groups comprising SEPE officials and officials from the Special Service for Insurance Inspection (EYPEA) of the IKA.

The number of workers employed in enterprises where inspections have been carried out amounts to 77.666 and the resultant number of uninsured workers amounts to 19.435. Of these 19.435, 6.687 are foreigners and 12.748 Greeks.

As far as children's rights are concerned, those respecting the employment of minors fall under the competency of the SEPE. The SEPE Services are responsible for the issuing of minors' booklets – following a doctor's opinion – so that minors aged over 15 might be allowed to be employed in enterprises.

The inspections of workplaces in order to discover cases of illegal employment of minors constitute one of the main activities of the Labour Inspectors, as minors constitute one of the vulnerable and special groups of workers that suffer severely by the non-application of the labour law provisions. The SEPE Services are responsible for the issuing of minors' booklets – following a doctor's opinion – so that minors aged over 15 might be allowed to be employed in enterprises. Furthermore, during inspections, the inspectors examine the legality of the minors' employment and, in the case that violations are observed, the legal sanctions are imposed.

In 2010, in accordance with Law 1837/89 "On the protection of minors in employment and other provisions", 1.463 minors' booklets were granted, following a doctor's examination. 781 of those were for boys and 682 for girls.

The table below shows the number of minors' booklets that were officially approved by the regional Social Inspectorate services and the sanctions imposed for illegal employment of minors from 2005 to 2010.

Year	Officially approved minors' booklets	Lawsuits filed for illegal employment of minors	Fines imposed for illegal employment of minors
2010	1.462	3	4
2009	1.752	0	17
2008	2.775	15	31
2007	3.129	9	18
2006	2.692	2	17

The SEPE constitutes one of main bodies for the promotion of the principle of equal treatment in employment and occupation by means of contributing to the greatest possible increase in the participation in employment of women and of various other disadvantaged groups. The SEPE, in a special chapter of the annual Activity Report is issues, refers to the application and promotion of equal treatment in the field of employment and occupation.

By virtue of Circular No30482/26-4-2007 of the Special Secretary of the Labour Inspectorate (SEPE), the Directorates of Social Inspectorates of the country are obliged to communicate to the SEPE Headquarters the cases of violation of Law 3488/2006, as amended and in force by Law 3896/8-12-2010, i.e. cases of violations of the provisions of the principle of equal treatment of men and women in employment, vocational training and advancement as well as working terms and conditions. These data are communicated within the first fortnight of every semester and refer to cases from the previous semester of each year.

The following table shows the data available for the year 2010:

VIOLATIONS OF ACTS No3488/2006 & No1483/1984 AS IN FORCE				
Type of Violation	**Complaints**		**Labour Disputes**	
	Men	**Women**	**Men**	**Women**
1. Dismissal of a pregnant woman	0	15	0	15
2. Harmful change in the working conditions of a working mother on maternity leave	0	7	0	15
3. Coercion to resignation	0	1	0	1
4. Sexual harassment	0	6	0	6
5. Dismissal of women in confinement and breastfeeding	0	2	0	2

women				
6. Non-provision of work following the six-month maternity leave	0	1	0	2
7. Maternity Protection	0	3	0	1
8. Non-provision of work – Inappropriate behaviour	0	1	0	1
9. Refusal to grant confinement leave	0	1	0	1
10. Complaint for discrimination on the grounds of sex	0	2	0	2
11. Non-provision of work to a breastfeeding woman	0	1	0	1
12. Non-payment for work rendered and termination of employment contract	0	1	0	1
13. Non-granting of documents for the granting of maternity leave	0	1	0	1
Inappropriate–Abusive behaviour Coercion to resignation				

Comments regarding Law 3304/2005 "Implementation of the principle of equal treatment irrespective of racial or ethnic origin, religious or other beliefs, disability, age or sexual orientation" and recommendations for its amendment

In the introduction of the comments by the National Committee of Human Rights, the phrase "Nevertheless, Greece didi not incorporate correctly the two EU legislative instruments" is more accurate as follows "Greece in incorporating, did not comply fully with the two EU instruments".

In part B. Comments on the Economic and Social Committee (ESC), we note that the Law 3304/2005 gives a different role between the ESC and the bodies competent for its implementation. It must be cleared out that the ESC is the institutional social dialogue body that has been designated by law 3304/2005 as the body responsible for reviewing the implementation of the law 3304/2005 and consulting the Government on the promotion of the principle of equal treatment.

Besides that, we would like to point out the fact that the NCHR does not make any specific reference to Reports or Opinions by the ESC, in order to explain where it gets the information for the comments it presents in its Report.

Furthermore, it is common knowledge that the population of Greece, given the fact that it has become a country of acceptance, consists of groups with distinctive cultural, linguistic and religious characteristics. That said, we find it difficult to understand the use of the phrase "the ESC ascertains that the population of the country is "composed" of groups with distinctive cultural, linguistic and religious features".

In part II. C. The scope of application of equal treatment, positive action and occupational requirements, we think that the paragraph b, is pointless, given that the practice of taking positive steps has been recognized by the national law at supreme level (art 116 of the Constitution), as a means of achieving substantial equality and tackling inequalities.

Also, in part II. C) we believe that the sentence c, is without subject. According to the law system, every law must be in compliance with the Constitution, while according to standard law principal, laws must not conflict each other. Even in cases where there is this phenomenon, the legislator is obliged to interpret all provisions in order not to violate the very core of the law.

Concerning part D of the Report – Different treatment due to age, we note that art.11 of law 3304/2005 incorporates directly art.6 of Directive 2000/78 and it fully covers the cases of discrimination based on age both in the private and the public sector.

Finally, we would like to note that in the framework of the EU Initiative Progress, a number of actions have been taken in order to inform the competent bodies on the implementation of Law 3304/2005. Namely, a seminar on the implementation of the principle of equal treatment to the National School of Judges, the elaboration of an Ethics Code for the Public

Administration Bodies, Public and Private Enterprises, aiming at informing employees both in the public and the private sector about the legal framework on equal treatment, as well as actions to raise awareness concerning the Law to bodies that deal with groups that face discrimination.

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In accordance with article 53§3 of Civil Servants' Code (Law 3528/2007), if both parents are employees, they make a joint statement and submit it to the service they engage in, in order to determine which one of them will make use of the reduced hours of work or of the leave to bring up their children, unless, in the said statement, the parents set the periods of time, in which each of them will make use of the reduced hours of work or of the leave to bring up their children, but always in an alternate way and within the time limits.

Also, if the employee's wife neither works nor engages in any occupation, her husband is not entitled to make use of the provisions of article 53§3 of Civil Servants' Code. However, in case the employee's wife, due to a grave illness or damage she suffers, is found unfit to bring up her child, according to a certificate issued by the Secondary Health Committee, then her husband is entitled to make use of the said provisions.

According to the competent Ministry of Interior, for the application of the said provisions, dependent paid work, freelance work including agricultural occupations, as well as self-employment (individual enterprise) are regarded as work in the private sector.

Based on the above, the National Committee of Human Rights notes that, in Greece, male civil servants do not enjoy equal rights as female civil servants. It also states that the leave for the bringing up of a child should be granted separately to each parent if both are civil servants and that the husband should be entitled to this leave even if his wife does not work.

Following a research conducted by the Ministry of Interior, it has been observed that in Greece the granted fully paid leave for the bringing up of a child is of a long duration and much longer than almost all the respective leaves that are provided for in the rest of the EU member states.

According to the provisions of article 53, para2 section b, the paid nine-month leave is granted instead of reducing working hours by two hours per day, on condition that the children are up to two years old, and by one hour per day, on condition that the children are from two to four years old. Initially, these provisions had been established in order to facilitate breastfeeding women. Later, the Civil Servants' Code (Law 2683/99) provided for that a nine-month leave might be granted to the mother instead of reduced working hours, as an incentive due to the very low birth rate in Greece, so that she could be near her child mainly because of breastfeeding.

Following the above, with a view to achieving the aim for which it was provided for, the said leave or reduced working hours are granted to one of the two parents depending on the needs of each family. The granting of the said leave to both parents at the same time will create a huge problem in the operation of public services and especially in sectors that deal with sensitive issues such as hospitals, schools, etc. Furthermore, the economic

circumstances of our country are not in favour of this double burden that will result from the introduction of such a regulation.

Additionally, we would like to inform you that both parents who are civil servants can take unpaid leave for up to two (2) years for the bringing up of a child aged up to 6 years irrespective of the nine-month leave (article 51, para2 of the Civil Servants' Code).

Following the above, it must be noted that the help offered to both parents that are civil servants to choose jointly who will make use of the nine-month leave and for how long, is favourable for the Greek family, considering the living conditions nowadays.

Also, we would like to inform you that the reference made in para2 on page 5 of the NCHR's report concerning the 21st Greek Report, is mistaken; the exact opposite of what is stated applies, i.e. the employee who makes use of the reduced working hours may apply for the nine-month leave without any reduction in their salary and at any time, on condition that this leave will be used up before their child completes its fourth (4th) year of age.

Additional comments on the EEDA observations on the 21st report ESC

The **observation made by the National Commission for Human Rights (EEDA)** on the 21st report concerning article 16 of the European Social Charter **refers to the Report and Recommendations of the National Commission for Human Rights on issues concerning the situation and rights of Roma in Greece, which was published on 18/02/2009.** At this point it must be stressed that, in the 21st National Report on the Application of the European Social Charter with reference period from 01/01/2005 to 31/12/2009, updated data concerning the said reference period are included, which were made available in September 2010, while the reference relates to a previous report and does not take into account the updated data, which are in conformity with the EEDA recommendations; it is regarded, therefore, unnecessary to refer to them separately.

The drawing up of a **Draft Single Strategy for Roma**[1], which is in progress and is based on consultation and cooperation among all interministerial and interinstitutional bodies (recommendation No.8), Roma representatives included (recommendation No.5), on acknowledgement of deficiencies (recommendation No.3) and on a long-term planning with specific action areas, proves Greece's will to approach the issue in a holistic way by means of both taking measures and implementing policies (recommendation No.1), following the recommendations proposed by the EEDA in the aforementioned report.

The **creation,** in the Ministry of Interior, Decentralisation and E – government (YPESAID), **of a database and a data processing system** of loans and of the main infrastructure work[2] lying within its competence, permits the monitoring of the progress of works on the one hand and the better evaluation of the situation on the other, so that the necessary institutional (legislative and procedural) actions can be taken and amendments can be made. Moreover, concerning the drawing up of a **Draft Single Strategy for Roma,** the YPESAID intends to cooperate with the Greek Ombudsman on the data maintained in its files, so that a unified and integral database can be created, which could be useful for the actions to be taken within the framework of the new national Strategy for Roma.

The **mapping**[3] as well as the analytical and **quantitative data**[4] shown on graphs that are included in the 21st National Report combined with the money offered and the respective beneficiaries[5], which depict the situation of the infrastructure work and of loans, i.e. of the housing intervention actions taken within the framework of the Integrated Action Plan, and prove the intention to promote the social integration of Roma and eliminate discrimination against them[6], underline the implementation of a housing policy in favour of a vulnerable social group of the Greek population on the one hand and pursue the effort to comply with the recommendations made by the EEDA, on the other.

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[1] Detailed information about the draft National Strategy for Roma that is being drawn up is included in the 21st National.

[2] Since 2005, a database of loans is maintained in the YPESAID, which is continuously updated, taking into account the revised evaluation process of Roma applications; moreover, a database is maintained on the main infrastructure work undertaken by the local government, which have been financed by the YPESAID, aiming at improving Greek Roma living conditions in areas with grave problems.

[3] 21st National Report, p. 39

[4] 21st National Report, pp. 41-43

[5] Regarding the money spent on infrastructure work, please refer to page 39 of the 21st National Report, while, concerning the loans, please note that the number of the approved applications mentioned in the 21st National Report (p. 40) amounts to 7.854 and is larger than that referred to in the previous 16th National Report, i.e. 5.111 approved applications.

[6] Elimination of discrimination refers to Roma as a whole and to a part of their population, i.e. to women and children within the greater group, points of recommendation No.6 and part of recommendation No.7 respectively, of the above mentioned EEDA Report.

The **continuous revision of the national institutional framework**[7], so that it meets as effectively as possible the ever changing needs and living standards of the Greek ROMA as well as the requirements of this group, proves the interest and the continuous engagement of the Greek public administration in the implementation of the housing policy. This revision supports and is reinforced by the fact that the European Commission's announcement regarding the "EU Framework for national Roma Integration Strategies up to 2020" is supported by Greece, as well as by the fact that Greece participates in the procedures for the revision of the legislation governing the operation of the EU bodies. More specifically, in 2009, the YPESAID participated in the revision of the Regulation 1080/2006 concerning the European Regional Development Fund (ERDF), so that the housing expenditure for marginalized groups, including the Roma, is funded from now on by the said fund irrespective of the time of accession of a member state to the EU.

Within the framework of the Integrated Action Plan, the financing of a study on finding suitable relocation sites within the region of Attica, for the ROMA of Eleonas-Votanikos, is part of the total effort to secure alternative housing. This study together with the draft National Strategy, which addresses issues of legislative and procedural guarantees as far as forced evictions are concerned, document the efforts made to remedy existing weaknesses.

Taking into account the above and mainly the points referring to the policy in general that has been pursued during the period under examination, which have been included in the 21st National Report, it is stressed that the YPESAID, as a coordinator of the Integrated Action Plan, makes continuous efforts to promote the better implementation of the housing policy adopted as well as its re-planning, based on the existing needs and problems of the target group, so that the vulnerable families, among which are the Roma, be able to enjoy adequate temporary and permanent housing. The safeguarding, from this perspective, of the social protection of Roma families combined with the settlement of issues relating to the status of civil registration, which gives the Roma legal status, create the necessary conditions for them to enjoy individual, social and political rights and comply with article 16 of the European Social Charter.

[7] More specifically, regarding the institutional framework for housing loans, it has to be noted that the amendment of Decision No33165/2006 by Decision No15654/31.03.2011 is the most recent revision. Apart from the legislation on loans, it is worth noting that Act No3852/2010 – "Kallikratis" Program, which redistributes the competencies at administrative and local government levels, entrusts the local authorities, in accordance with the principle of subsidiarity, with the resolution of the problems of the Roma, in light of the regional planning and the unified national strategy.