



ΠΑΓΚΥΠΡΙΑ ΣΥΝΤΕΧΝΙΑ ΙΣΟΤΗΤΑ  
ΑΞΙΟΠΡΕΠΕΙΑ-ΙΣΟΤΗΤΑ-ΕΡΓΑΣΙΑΚΑ ΔΙΚΑΙΩΜΑΤΑ

# COLLECTIVE COMPLAINT

*under the Additional Protocol to the European Social Charter providing for a system of collective complaints (ETS No. 158)*

## PAN-CYPRIAN TRADE UNION ISOTITA

*Complainant*

V.

## CYPRUS

*Respondent State*

Alleging unsatisfactory application of Articles 5, 6 and 28 of the Revised European Social Charter, read alone and in the light of Article E

**WITH A REQUEST FOR THE INDICATION OF IMMEDIATE MEASURES — RULE 36**

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**PAN-CYPRIAN TRADE UNION ISOTITA**

Nicosia, 11 June 2026

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**To:** The Secretary General of the Council of Europe

**Via:** The Executive Secretary of the European Committee of Social Rights  
Department of Social Rights, Directorate General Human Rights and Rule of Law  
Council of Europe, 1 quai Jacoutot, F-67075 Strasbourg Cedex, France  
*By electronic mail (social.charter@coe.int)*

**Subject: Collective Complaint under the 1995 Additional Protocol to the European Social Charter (ETS No. 158) — Pan-Cyprian Trade Union ISOTITA v. Cyprus — Articles 5, 6 and 28 of the Revised European Social Charter, read alone and in the light of Article E — Request for the indication of immediate measures (Rule 36)**

Dear Secretary General,

Pursuant to Article 1(c) of the Additional Protocol of 1995, the Pan-Cyprian Trade Union ISOTITA, a representative national trade union registered in the Republic of Cyprus, hereby lodges the enclosed collective complaint against the Republic of Cyprus, alleging unsatisfactory application of Articles 5, 6 and 28 of the Revised European Social Charter, read alone and in the light of Article E.

In view of the serious and irreparable injury threatened — in particular the continuing assignment of an elected workers' representative to duties contrary to binding medical opinions, and the imminent escalation of disciplinary proceedings against another elected representative — the Union respectfully requests the indication of **immediate measures** pursuant to Rule 36 of the Committee's Rules, as set out in Section VI of the complaint.

The complaint is lodged in English; a Greek translation is enclosed. The evidence accompanies it as a single indexed, continuously paginated bundle of Annexes 1–14 (383 pages, with navigation bookmarks). We kindly request acknowledgment of receipt and registration of the complaint.

Respectfully submitted,

**Prodromos Christofi**

President of the Board — duly authorised to represent the Union

## COLLECTIVE COMPLAINT

*Pan-Cyprian Trade Union ISOTITA (Complainant) v. Cyprus (Respondent State)*

Lodged under the Additional Protocol to the European Social Charter Providing for a System of Collective Complaints (ETS No. 158)

### I. THE COMPLAINANT ORGANISATION

1. The Pan-Cyprian Trade Union ISOTITA — registered as the “Pan-Cyprian Trade Union of Employees, Self-Employed Persons, Fixed-Term, Indefinite-Duration and Contract Staff (ISOTITA)” under the Trade Unions Laws 1965–1996 (principal Law 71/1965; registration no. 1006, certificate of the Registrar of Trade Unions of 18 December 2017) (“the Union”) — has its seat at 57A Aglantzias Avenue, 2108 Nicosia. It organises employees across the public and broader public sector, as well as in the private sector, through seventeen occupational Branch Councils — elected sectoral representative bodies — including the Prison Officers’ Branch Council and the Police Body Branch Council (the full list is published on the Union’s website, isotita.net). Its representative role is exercised through standing engagement with ministries and departments, collective representations, and public advocacy. The registration certificate and the Union’s approved Statutes appear in Annex 14.
2. The present complaint is signed by Mr Prodromos Christofi, President of the Board, who is empowered to represent the Union under its registered Statutes (Annex 14), in accordance with Rule 23 of the Committee’s Rules.

### II. THE RESPONDENT STATE — JURISDICTION AND ADMISSIBILITY

3. Cyprus ratified the Revised European Social Charter on 27 September 2000 (Law 27(III)/2000) and accepted, *inter alia*, Articles 5, 6 and 28 in full (section 4 of Law 27(III)/2000); in October 2011 it accepted nine further provisions. Cyprus accepted the Additional Protocol providing for a system of collective complaints on 6 August 1996; the Protocol has been in force for Cyprus since 1 July 1998.
4. Standing (*ratione personae*). The Union is a “representative national trade union” within the meaning of Article 1(c) of the Protocol. Representativeness under the Protocol is an autonomous concept: the Union is lawfully registered, maintains seventeen elected Branch Councils across its sectors, including the entirety of its Prison Officers’ Branch, and plays an active role in representations and collective matters within its sectors. No declaration under Article 2 of the Protocol is required for national trade unions.
5. *Ratione materiae* and *temporis*. The complaint concerns Articles 5, 6 and 28 of the Revised Charter — provisions accepted by Cyprus — read alone and in the light of Article E, in respect of facts occurring from December 2025 onwards, long after the entry into force of the Protocol for Cyprus.
6. Form. The complaint is in writing, identifies the provisions concerned and the respects in which the Respondent State has failed to ensure their satisfactory application (Article 4 of the Protocol), and is signed by the person entitled to represent the Union (Rule 23). It is lodged in English with a Greek translation (Rule 24).
7. Exhaustion of domestic remedies is not a condition of admissibility under the collective complaints procedure. The national and international proceedings pending (paragraph 17 below) are disclosed for completeness and transparency; none bars the examination of the present complaint, which targets the conformity of practice with the Charter.

### III. SUBJECT OF THE COMPLAINT

8. The Union alleges a coordinated and escalating use of public authority directed against the elected leadership of its Prison Officers’ Branch — its Vice-President and Press Officer, Mr Georgios Maltezos, and its President, Mr Konstantinos Konstantinou — following public-interest disclosures and the denunciation of favouritism (“*rousfeti*”), combined with structural discrimination in favour of a single rival organisation (PASDYD) in State funding and access to consultation machinery. The Union submits that this state of affairs discloses violations of

Articles 5, 6§§1–2 and 28 of the Revised Charter, read alone and in conjunction with Article E.

## IV. THE FACTS

### A. Public-interest disclosures, subsequently vindicated

9. In December 2025 Mr Maltezos, acting in his elected capacity as Press Officer of the Branch Council, publicly raised overcrowding, the uncontrolled circulation of narcotics and chronic understaffing at the Central Prisons. The substance of those conditions-of-detention disclosures is independently confirmed by the judgment of the Nicosia Permanent Assize Court of 29 July 2025 in case no. 19600/2022 (systematic drug dealing within the wings) and by the report of the Council of Europe’s own Committee for the Prevention of Torture, CPT/Inf (2025) 39, published on 10 December 2025 (dramatic overcrowding; urgent call to recruit and train more front-line prison staff) (Annex 9). Separately, he denounced practices of favouritism (“rousfeti”); that distinct allegation does not form part of the matters confirmed by the above judgment or report — it is the subject of the Union’s complaints to the Independent Authority Against Corruption and to the Attorney-General (Annexes 1 and 12) and remains pending and unadjudicated.

### B. The sequence of prejudicial measures against Mr Maltezos

10. By Order 3/26 of 3 February 2026 (effective 8 February 2026) he was abruptly removed from the shift system in which he had served for eight years and assigned to fixed office hours (07:30–15:00) at the Technical Services Office — under the direct supervision of the head of the rival organisation’s prison branch, an objective conflict of interest.
11. By successive letters of 2 March, 8 April, 14 April and 27 April 2026 (ref. Τ.Φ. 18.05.004) the administration treated trade-union time as a discretionary concession, “granting” limited hours by way of exception and under warning of consequences (Annex 3).
12. He was recorded as “unjustifiably absent” for 9 April 2026, although he had given prior notice that he would be performing trade-union duties at the material time, and although, by letter of 22 April 2026 (Annex 4), he had asked to be returned to the shift system precisely so that his representative functions would not draw upon working time.
13. On 4 May 2026 he was summoned in writing to account for a trade-union announcement issued for Labour Day; disciplinary proceedings were then set in motion on the basis of the allegedly unjustified absence; and on 8 May 2026 an investigating officer was appointed under section 81(2)(b) of the Public Service Law — the gravest disciplinary route — twenty-four hours after the Union’s formal internal complaint of 7 May 2026 (Annexes 5–6).

### C. The Branch President, Mr Konstantinou

14. On 6 May 2026, by oral order, the elected President of the Branch Council was assigned duties in enclosed spaces in breach of binding medical opinions excluding such duties for documented health reasons. The assignment endangers his health and remains in effect; the Union’s written demand for its immediate revocation (Annex 6) has not been satisfied.

### D. Structural discrimination between trade unions

15. According to the State’s own budgetary records (expenditure article 0401200092), State grants totalling €8,410,000 were paid for the years 2017–2025 exclusively to a single organisation, PASYDY, while the Union received nothing (Annex 2). The Union is likewise excluded from the Joint Staff Committee (Μικτή Επιτροπή Προσωπικού), the standing consultation machinery for the public service, and its representative was placed under the direct supervision of the head of that rival organisation’s branch (paragraph 10 above).

### E. Pattern and pending proceedings

16. The Union submits that the foregoing are not isolated incidents but elements of an orchestrated effort to silence its elected representatives and to weaken — ultimately to close — the organisation, to the benefit of the exclusively State-funded rival, through practices of favouritism and patronage.

17. Proceedings already initiated and pending: internal complaint to the Prisons Directorate (7 May 2026); complaint to the Commissioner for Administration and the Protection of Human Rights (18 May 2026; section 13(2) of Law 42(I)/2025); complaints to the Minister of Labour and the Registrar of Trade Unions (19 May 2026; section 13(1)); complaint to the Independent Authority Against Corruption (20 May 2026); submission to the European Commission (ref. 93021, 21 May 2026); criminal complaint to the Attorney-General (27 May 2026); and a complaint to the ILO Committee on Freedom of Association (8 June 2026) (Annexes 1, 5–8, 10, 12–13).

## V. ALLEGED VIOLATIONS OF THE REVISED CHARTER

### A. Article 5 — the right to organise

18. Article 5 obliges the State both to refrain from interference and to ensure, in law and in practice, effective protection of workers and their organisations against acts of anti-union discrimination and reprisal. Prison officers are civil employees to whom Article 5 applies in full; they fall outside the narrow categories (police, armed forces) for which special limitations are permitted, and any restriction must in any event satisfy Article G. The sequence set out in paragraphs 10–13 — a punitive transfer, the treatment of representative time as a revocable concession, and a disciplinary escalation objectively linked in time and substance to protected activity — discloses a failure of that protection in practice.
19. Article 5 further requires the State to remain neutral as between trade unions. Exclusive, sustained and non-transparent public funding of one organisation (€8,410,000 against zero), combined with exclusion of the complainant from consultation machinery and the subordination of its representative to an officer of the rival organisation, confers a decisive advantage on one union and pressures workers in their choice of organisation. Such favouritism is incompatible with Article 5, interpreted in harmony with Article 11 of the European Convention on Human Rights (*Wilson and the NUJ v. the United Kingdom*, 2 July 2002; *Demir and Baykara v. Turkey* [GC], 12 November 2008; *Straume v. Latvia*, 2 June 2022, on reprisals against a trade-union representative for statements made on behalf of her union) and consistently with the Committee’s approach to the right to organise (see, e.g., *EUROMIL v. Ireland*, Complaint No. 112/2014). Cypriot public law itself recognises the principle of trade-union pluralism (*ΠΑΣΥΝΟ v. Republic* (1994) 4 A.A.Δ. 174).

### B. Article 6 — the right to bargain collectively

20. Article 6§1 requires the promotion of joint consultation between workers and employers, and Article 6§2 the promotion of machinery for voluntary negotiations. The structural exclusion of a representative union of prison staff from the Joint Staff Committee and from any equivalent consultation machinery — while a single favoured organisation enjoys both funding and institutional access — fails to secure the effective exercise of these rights for the workers the Union represents.

### C. Article 28 — workers’ representatives

21. Article 28 guarantees workers’ representatives (a) effective protection against acts prejudicial to them based on their status or activities as representatives, and (b) appropriate facilities to carry out their functions promptly and efficiently. The punitive transfer, the disciplinary prosecution founded on an absence of which prior notice had been given, the appointment of an investigating officer under the gravest disciplinary provision within twenty-four hours of the Union’s complaint, and the health-endangering assignment of the Branch President are acts prejudicial within the meaning of Article 28(a). The treatment of trade-union time as a discretionary, warning-laden concession negates the facilities required by Article 28(b), as does the refusal of the representative’s own proposal (Annex 4) designed to avoid any use of working time.

### D. Article E — non-discrimination

22. In the alternative and cumulatively, the difference in treatment between the Union (and its members and representatives) and the favoured organisation — in funding, in access to consultation, in facilities and in exposure to reprisals — rests on no objective and reasonable

justification and amounts to discrimination on the ground of trade-union affiliation (“other status”), in conjunction with Articles 5, 6 and 28.

- 23.** Aggravating context. The reprisals respond to public-interest disclosures whose substance — as regards the conditions of detention — has been confirmed by the Council of Europe’s own CPT. Penalising the representative who voiced them produces a chilling effect on the exercise of representative functions that the Charter is designed to secure (cf. *Straume v. Latvia*, cited above).

## VI. REQUEST FOR IMMEDIATE MEASURES (RULE 36)

- 24.** To avoid a risk of serious and irreparable injury, the Union requests the Committee to indicate to the Respondent State, pending its decision: (a) the suspension of the assignment of Mr Konstantinou to duties in enclosed spaces and full compliance with the binding medical opinions concerning him; and (b) the suspension of the disciplinary procedure initiated against Mr Maltezos under section 81(2)(b), and abstention from any further prejudicial measure against the Union’s elected representatives in connection with their representative functions.

## VII. FINDINGS AND MEASURES REQUESTED

- 25.** The Union respectfully requests the Committee to: (a) declare the complaint admissible; (b) find that the situation in Cyprus constitutes a violation of Articles 5, 6§§1–2 and 28 of the Revised Charter, read alone and in the light of Article E; and (c) invite the Committee of Ministers to recommend that Cyprus — (i) cease the prejudicial measures and restore Mr Maltezos’s previous working arrangements; (ii) ensure full compliance with the medical opinions concerning Mr Konstantinou; (iii) guarantee in practice the protection and facilities of workers’ representatives required by Article 28; (iv) establish objective, transparent and non-discriminatory criteria for any public funding of trade unions and for access to joint consultation machinery; and (v) report on the measures taken.

## VIII. LANGUAGE AND ENCLOSURES

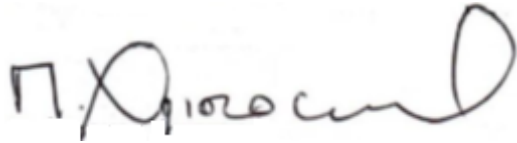
- 26.** The complaint is lodged in English; a Greek translation is enclosed. The evidentiary bundle of Annexes 1–14 (383 pages, indexed and continuously paginated) accompanies the complaint.

## IX. INDEX OF ANNEXES

- Annex 1 — Letter-complaint to the Independent Authority Against Corruption (20 May 2026): full legal and factual development.
- Annex 2 — Statements of the State grant to PASYDY, 2017–2025 (expenditure article 0401200092).
- Annex 3 — Letters of the Acting Director of the Prisons Department of 2 March, 8 April, 14 April and 27 April 2026 (ref. T.Φ. 18.05.004).
- Annex 4 — Request of Mr Maltezos for reinstatement to the shift system (letter of 22 April 2026).
- Annex 5 — Appointment of an investigating officer under section 81(2)(b) (8 May 2026) and disciplinary summons (4 May 2026).
- Annex 6 — Internal complaint of the Prison Officers’ Branch Council to the Prisons Directorate (7 May 2026).
- Annex 7 — Reply of the Department of Labour Relations / Registrar of Trade Unions (29 May 2026).
- Annex 8 — European Commission complaint form (ref. 93021, 21 May 2026), with the detailed description annexed thereto.
- Annex 9 — Public-record documentation of detention conditions at the Central Prisons: report CPT/Inf (2025) 39 (10 December 2025) and judgment of the Nicosia Permanent Assize Court (case no. 19600/2022, 29 July 2025); the full text of the judgment is included.
- Annex 10 — Complaint to the Commissioner for Administration and the Protection of Human Rights (18 May 2026; section 13(2) of Law 42(I)/2025).
- Annex 11 — Letter of the Prisons Department Directorate to the Attorney-General (9 March 2026), referring the legal question of trade-union absence; no opinion was ever received.
- Annex 12 — Criminal complaint to the Attorney-General (27 May 2026), covering inter alia the favouritism/patronage pattern.

- Annex 13 — Complaint to the ILO Committee on Freedom of Association (lodged by electronic mail on 8 June 2026); the transmission record is included.
- Annex 14 — Certificate of registration of the Union (Registrar of Trade Unions, registration no. 1006, 18 December 2017) and the Union's approved Statutes (as revised on 2 April 2024), evidencing inter alia the President's authority to represent it.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'P. Christofi', written in a cursive style.

**Prodromos Christofi**

President of the Board, Pan-Cyprian Trade Union ISOTITA  
Nicosia, 11 June 2026