



Greek National Commission for Human Rights (GNCHR)

**Comments by the GNCHR
to the European Committee of Social Rights
on the 7th National Report
on the implementation of the European Social
Charter
Articles 2, 3, 4, 5, 6, and 20**

June 2026



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 with Law 2667/1998 in accordance with the UN Paris Principles and is governed by Law 4780/2021. Its members are persons appointed by twenty institutions (independent Authorities, third level trade unions, NGOs, universities and research institutions)



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**Comments by the GNCHR to the European Committee of Social Rights on the 7th
National Report on the implementation of the European Social Charter**

(Articles 2, 3, 4, 5, 6, and 20)

SUMMARY

The Greek National Commission for Human Rights (GNCHR) within its mandate to monitor the compliance of the Greek legislation to the provisions of international and European treaties and Directives, as well as soft law instruments, takes the opportunity to submit its comments on the [7th National Report on the implementation of the revised European Social Charter \(ESC\)](#) submitted by the Government of Greece on Articles 2, 3, 4, 5, 6, and 20, registered by the Secretariat on 17 March 2026 [RAP/ RCha /GRC/7(2026)] based on the [Proposed questions from the European Committee of Social Rights \(5 June 2025\)](#).

In this regard, the GNCHR refers back to its previously expressed concerns and comments on the 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)¹ and on the impact of financial and other restrictive measures on labour rights and working conditions in Greece² and the cost-of-living crisis report to the ECSR³

¹ GNCHR, 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), December 2022.

² See GNCHR Observations on Greece's combined 23rd and 24th periodic report to the Committee on the Elimination of Racial Discrimination (CERD), 2021; GNCHR Submission to the UN 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, 2021; GNCHR Stakeholder Report to the Universal Periodic Review (UPR) of Greece, 2021; GNCHR, Observations submitted by the Greek national Commission for Human Rights (GNCHR) in view of the examination of the 27th Greek Report on the application of the European Social Charter (Articles 3, 11, 12, 13 and 14) and on the 11th Greek Report on the application of the Additional Protocol to the European Social Charter (Article 4) (Reference Period 01/01/2012-31/12/2015), January 2017; GNCHR factsheet on the "Impact of Economic Reform Policies and Austerity Measures on Human Rights" 2018; GNCHR Observations on the 24th Greek Report on the application of the European Social Charter and on the 9th Greek Report on the application of the Additional Protocol to the European Social Charter, 2014; GNCHR, Observations on Draft Law of the Ministry of Labor and Social Affairs *On the Protection of Employment, Establishment of the Independent Authority Labor 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 careers*", 14 June 2021 (hereinafter GNCHR Observations on the Bill On the Protection for Employment), [Summary of GNCHR Observations](#) on Draft Law of Ministry of Labour and Social Affairs *On the Protection of Employment, Establishment of the Independent Authority Labor 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*

on the one hand, while it formulates further relevant observations on the situation of the ESC specific rights, as indicated in the aforementioned questions of the Committee, the relevant criteria (or their lack) based on these questions, the progress made by the competent authorities and the way forward.

INTRODUCTION

Role and remit of the GNCHR

The GNCHR as the A Status National Human Rights Institution and the independent advisory body to the Greek State on matters pertaining to the protection of human rights, has, by virtue of Law [4780/2021](#), which has replaced its founding Law 2667/1998, acquired legal personality, functional independence, administrative and financial autonomy. It should be noted that since 2001, the GNCHR is being accredited A status (full compliance) with UN Paris Principle, indicative of its independence and effective fulfillment of its role.

The GNCHR Plenary is comprised of 20 members nominated by institutions whose activities cover the field of human rights: independent authorities, third level trade unions, NGOs, bar associations, universities, research institutions and the Parliament.⁴

The GNCHR is entrusted with the dual mandate of protecting and promoting human rights in Greece as set forth in its founding law and its Regulation. In this respect, its main mission is:

- The constant monitoring of developments regarding human rights protection, the continuous reporting and the promotion of the relevant research.
- The maintenance of permanent contact and co-operation with international organisations, such as the United Nations, the Council of Europe, the OSCE, with NHRIs of other States, as well as national or international non-governmental organisations.
- The formulation of policy advice on human rights issues.

Amongst its most essential competences is **the provision of advice** to the competent bodies of the State for the effective implementation of human rights protection, in the context of its preventive and protective action, by harmonizing legislative, administrative or other measures with the country's international obligations. Its advisory role, however, is not limited to submitting opinions, recommendations,

Parliament and of the Council of 20 June 2019 on work-life balance for parents and careers, 2021 (hereinafter Summary of GNCHR Observations on the Bill On the Protection for Employment).

³ GNCHR, [GNCHR Additional Information - Observations to the European Committee of Social Rights of the Council of Europe on the ad hoc National Report on the cost-of-living crisis in the context of the European Social Charter](#), June 2024.

⁴ For the full list of GNCHR's Members, please visit the site of the GNCHR www.nchr.gr

proposals or reports and participating in Parliamentary sessions. Its role also extends to assisting the reports submitted by national competent authorities for their compliance with international, regional and / or European human rights standards (*monitoring and reporting*) as well as encouraging the ratification of international human rights treaties. In fact, in its institutional role and mission as a “guardian” of human rights at international, regional and national levels, the GNCHR plays a central role in bridging the gap not only between the State and Civil Society, but also between the Country’s international commitments for the implementation of human rights and their effective enjoyment in practice.

Submission of the present Report

The GNCHR has also submitted observations on previous Greek Reports examined by the European Committee of Social Rights (hereinafter ECSR) on the application of the ESC.

The Ministry of Labour and Social Security (Directorate of International Relations) forwarded a copy of the National Report to the GNCHR for its information on 18.3.2026, after the report had been submitted to the ECSR and [registered by the latter on 17.3.2026](#). The Ministry of Labour and Social Security, through its designated liaison officer to the GNCHR, could have informed the Plenary about this new initiative of the Council of Europe, given the extensive reports of the GNCHR in the field of the human rights protection in the context of the economic crisis, which has been noted in case of the Greek General Confederation of Labour (GSEE) v. Greece, Complaint No. 111/2014, decision on the merits of 23 March 2017⁵. The GNCHR expresses once again its wish that the due collaboration between the state competent authorities on the application of the revESC and the GNCHR, as the national human rights institution (NHRI) will be restored so as to inform in a timely manner the Commission on the reporting processes, thus enabling its contribution, as the National Human Rights Institution to a comprehensive National Report.

GENERAL OBSERVATIONS

1. GNCHR would like to observe that in order to properly reflect and subsequently evaluate the prevailing situation in Greece, the 7th national Report would be appropriate to include a precise reference to the legislative measures adopted for the compliance and restoration of the due implementation of the rev. ESC’s provisions, which have been found by the ECSR to have been violated.

Apart from a few exceptions of legal provisions, acknowledged as violating the ESC, that were repealed (explicitly or non-explicitly), Greece has not complied until today with

⁵ ECSR, [Greek General Confederation of Labour \(GSEE\) v. Greece, Complaint No. 111/2014, decision on the merits of 23 March 2017](#), par. 61.

certain obligations arising from the provisions of the rev. ESC. National Reports should reflect with clarity the current legislative framework at the time of their submission, all the more so since updated information on the country's regulatory framework in force and its implementation in practice has been officially and repeatedly requested by the ESCR.

GNCHR brings to the attention of the ECSR that the Labor Code - KED, which was published and entered into force on July 11, 2025, replaced the Individual Labor Law Code (PD 80/2025, GG A'222/4-12-2022). The Labor Code is an administrative codification in the form of a Presidential Decree⁶, i.e. a structured listing of provisions of the legislation, without changing their content, as well as of regulatory acts (i.e. ministerial decisions). It is worth noting that the Code of Health and Safety Laws (referred to as "KNYAE", Law 3850/2010), to which the 7th National Report refers, has also been included in the KED. KNYAE has a different legal force, because it was prepared and voted through the parliamentary procedure required by the Greek Constitution (article 76 par. 6), while it contains the codification of substantial provisions of the integrated EU Law (EU Directives). Furthermore, KED includes provisions of laws that incorporate European law in critical regulatory areas (gender equality, discrimination, collective redundancies, information and consultation, etc.), as well as provisions that contain the measures of implementation of the European Social Charter and international labor Conventions, such as the ILO Convention 190 (on violence and harassment at work). The bad practice followed in the legislative process since the entry into force of the Individual Labor Law Code in 2022 and then the Labor Code in 2025 is that the regulations promoted in labor legislation do not amend the legislative acts to which they relate, but the provisions of the Code, causes serious legal uncertainty which has further negative impact to the implementation and monitoring of international conventions.

2. The GNCHR, taking into account the debt crisis restrictive measures, along with the migration policy restrictive measures, followed by the pandemic measures and their cumulative negative impact on workers' rights⁷ and living standards draws the attention

⁶ See also Ministry's of Labor and Social Security Statement dated 1.12.2022 entitled "The codification of individual labor law has been completed", stating, among other things, that: "The codification does not bring about any amendment, addition or repeal of provisions, but brings together the existing provisions as they apply, with logical and thematic continuity in order to facilitate the search for the existing institutional framework. In the event that there is a difference between the text of the Code and the original provision that has been codified, the one that will be applied will be the original provision."

⁷ The GNCHR notes with disappointment that, despite its repeated recommendations on the need to effectively monitor and assess the impact of both the austerity measures and the restrictive measures taken to address the COVID-19 pandemic on the enjoyment of human rights and especially on labour rights, the cumulative impact of these measures has never been assessed. [Summary of GNCHR Observations](#) on Draft Law of Ministry of Labour and Social Affairs "On the Protection of Employment Establishment of the Independent Authority Labor 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

also to the negative impact of the ongoing war in Ukraine, member State of the Council of Europe, on the socio-economic environment and the increased risk of deterioration of the labour rights and working and living conditions. The Greek economy having been challenged by multiple crisis (debt and pandemic crisis) is facing now a new destabilizing shock centered on energy, raw materials and basic food prices, while the real estate market and the prices of purchasing, but also renting, main residence depict a considerable increase⁸. This disturbance directly affects the supply side and indirectly, through the pay-as-you-go effects of inflation, the demand side, increases the risk of a new slowdown in the economy. The GNCHR would like to stress that the extent and depth of the impact of the pandemic crisis on social rights and the functioning of the economy in general is depicted in a series of recommendations addressed by the GNCHR to the Greek government and the EU and international Organisations and Institutions.⁹

European Parliament and of the Council of 20 June 2019 on work-life balance for parents and careers", 2021, GNCHR Report on the Draft Law of the Ministry of Labour and Social Affairs, 2021. See also: URGENT GNCHR Statement on Labour and Social Security Rights in Greece, 2017, *Austerity measures v. Human Rights and EU foundational values* (Sophia Koukoulis-Spiliotopoulos), 2013, GNCHR recommendation: "Urgent need to reverse the course of collapse of individual and social rights", 2011, *Decision on the need for continued respect for fundamental rights during the exercise of the strategy to exit the economy and society from the external debt crisis*, 2010.

⁸ See indicatively Bank of Greece, *Real Estate Market* and Bank of Greece, *New Index of Apartment Prices by Age*, 2024.

⁹ Extraordinary times call for extraordinary responses: Summary of Recommendations to the State regarding the impact of the pandemic and the measures taken to address it on human rights, 2021, *Austerity measures v. Human Rights and EU foundational values* (Sophia Koukoulis-Spiliotopoulos), 2020, GNCHR factsheet on the "Impact of Economic Reform Policies and Austerity Measures on Human Rights" 2018, Statement of the Greek National Commission for Human Rights (GNCHR) on the impact of the continuing austerity measures on human rights, 2015, Statement of the Greek National Commission for Human Rights (GNCHR) on the impact of the continuing austerity measures on human rights, 2014, Open letter of the President of the European Network of National Human Rights Institutions, Mr. Alan Miller, to the President of the European Commission, Mr. José Manuel Barroso and the President of the European Central Bank Mr. Mario Draghi, 2014, The NCHR Recommendation and decisions of international bodies on the conformity of austerity measures to international human rights standards, 2013, NCHR Recommendation: On the imperative need to reverse the sharp decline in civil liberties and social rights, 2011, *The need for constant respect of human rights during the implementation of the fiscal and social exit strategy from the debt crisis*, 2010. Summary of GNCHR Observations on Draft Law of Ministry of Labour and Social Affairs "On the Protection of Employment Establishment of the Independent Authority Labor 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 careers", 2021, GNCHR Report on the Draft Law of the Ministry of Labour and Social Affairs, 2021. GNCHR, "Observations on the 24th Greek Report on the application of the European Social Charter and on the 9th Greek Report on the application of the Additional Protocol to the European Social Charter", October 2014. GNCHR, Factsheet on the Impact of Economic Reform Policies and Austerity Measures on Human Rights, 2019, GNCHR, "Statement of the Greek National Commission for Human Rights (GNCHR) on the impact of the continuing austerity measures on human rights", July 2015, GNCHR, "Observations on the 24th Greek Report on the application of the European Social Charter and on the 9th Greek Report on the application of the Additional Protocol to the European Social Charter", October 2014, GNCHR, "Observations on the Draft of the Second Periodic Report of the Hellenic Republic for the International Covenant on Civil and Political Rights (ICCPR)", December 2013.

The severe impact of the economic crisis has been underlined in the respective reports of the GNCHR.

Moreover, the GNCHR, in view of comprehensively monitoring the promotion and protection of **individual and collective labour rights**, welcomes the National Social Agreement on the promotion of Collective Labor Agreements (CLAs), which was concluded through a tripartite social dialogue process in November 2025 and ratified by Law 5278/2026 (GG A' 22/16-2-2026), which is expected to contribute to the achievement of the goal, as set out in Directive (EE) 2022/2041 (art. 4 para 2), of 80% coverage of workers by CLAs. Still the GNCHR highlights the existing challenges, such as equal access and protection of just conditions of work, fair remuneration and protection of wage, protection of dignity, health and safety at work etc. in the context of adapting the Greek legislation to the human rights standards set by the revised ESC. At the same time, it stresses the need to undertake, without further delay, additional steps for strengthening the regulatory framework in force and to fill gaps where these are found to remain or occur, under the light and in compliance with ECSR decisions.

At the same time, it is important to take into consideration that there are similar State obligations according to [article 21 par. 1 of the Constitution of Greece](#), “*the State shall take care to ensure that all citizens enjoy a decent standard of living by means of a system of minimum guaranteed income, as specified by law*”, which is found under Part Two “Individual and Social Rights”. Besides, taking into consideration the Observations on the 5th National Report on the implementation of the Revised ESC, which sums up the finding that the reduction of the minimum wage was a constant issue throughout the years of the economic and pandemic crisis¹⁰. Besides, the minimum wage issue has been extensively discussed in the ECSR decision of the complaint No 114/2014 Greek General Confederation of Labour (GSEE) v. Greece¹¹.

It has been stressed that the rights – civil, political, economic and social – were openly violated and violated at all levels during the economic crisis in Greece¹². Austerity measures were put before human rights standards in several cases. All the same, today the cost-of-living crisis needs to be put before human rights standards in order to monitor the violations and the compliance of the State. Thus, the GNCHR considerations are still valid and in effect.

Cooperation between the State and the Greek National Commission for Human Rights (GNCHR) is of critical importance, as the Commission’s assessments regarding progress in the cross-sectoral protection of human rights and the challenges associated with its

¹⁰ See for more focused references to different recipients and contexts in the GNCHR, [Thematic Factsheet on the “Impact of Economic Reform Policies and Austerity Measures on Human Rights”](#), 5 January 2018.

¹¹ ECSR, Greek General Confederation of Labour (GSEE) v. Greece, Complaint No. 111/2014, decision on the merits of 23 March 2017, preliminary considerations and para. 86.

¹² FIDH – Hellenic League for Human Rights, [Downgrading rights: the cost of austerity in Greece](#), 2014, p. 90.

ineffective implementation in practice are formulated following analysis by its specialised scientific staff and deliberation by its Plenary. These assessments are informed by the Commission's pluralistic composition and draw upon the knowledge, expertise, and evidence contributed by its Members.

The composition of the GNCHR comprises individuals with demonstrated expertise and extensive experience in the field of the protection and promotion of human rights, who are appointed by: the Greek League for Women's Rights, the Hellenic League for Human Rights, Greek General Confederation of Labour (GSEE), the Supreme Administration of Civil Servants' Unions of Greece, the Greek National Confederation of Persons with Disabilities, the Panhellenic Confederation of Greek Rom (ELLAN PASSE), the Amnesty International-Greek Section, the Marangopoulos Foundation for Human Rights, the Greek Council for Refugees, the Greek Transgender Support Association (SYD), Athens Pride, the Lesbian & Gay Community of Greece (OLKE), Colour Youth - Athens LGBTQ Youth Community and Rainbow Families Greece, the Greenpeace Greece and WWF Greece, the Hellenic Data Protection Authority, the Greek Ombudsman, the Hellenic Authority for Communication Security and Privacy, the National Council for Radio and Television, the National Commission for Bioethics and Technoethics, School of Law- National and Kapodistrian University of Athens, School of Social Science at the University of Crete, the Plenary of Presidents of Greek Bar Associations, Centre for European Constitutional Law (CECL) - Themistokles and Dimitris Tsatsos Foundation.

At the same time, the GNCHR actively participates in the **European and international human rights monitoring framework relating to the promotion of gender equality, through its membership in the European Network of National Human Rights Institutions (ENNHRI) and the Global Alliance of National Human Rights Institutions (GANHRI)**. Furthermore, the Commission makes full use of its institutional mandate to contribute to and intervene in the periodic review processes conducted by the competent international and regional monitoring bodies concerning Greece's compliance with its international human rights obligations. In this context, the GNCHR contributes to the monitoring of the State's implementation of the recommendations and decisions issued by these bodies, with which Greece is expected to comply in fulfilment of its international commitments. 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. The GNCHR can intervene before courts based on article 19 of its legislation (Law 4780/2021), according to which *“the President shall be responsible for: (...) b) representing the National Commission before the courts and any national or foreign authority, as well as before international organisations and nongovernmental*



organisations". The GNCHR has exercised this competence in occasions such as before the European Court of Human Rights¹³ and before the Greek Council of State¹⁴.

¹³ GNCHR, [Written intervention by the GNCHR in the ECHR as regards the case of G.R.J. v. Greece and A.R.E. v. Greece](#), 6 June 2024.

¹⁴ GNCHR, [Intervention before the Council of State in favor of the constitutionality of the law on equality in civil marriage](#), 11 April 2025.

SPECIFIC OBSERVATIONS

1. Article 2 - Right to just working conditions

Article 2 para.1 - Reasonable daily and weekly working hours

A core pillar of the mission of GNCHR is monitoring the country's compliance with its international obligations for the implementation of human rights protection standards, as these are further specified through the decisions and recommendations of international monitoring bodies, as well as the case law of the Court of Justice of the European Union (CJEU) and the European Court of Human Rights (ECtHR).

The right to reasonable daily and weekly working hours and the state of play of national legislation and practice on working time.

The European Committee of Social Rights, in its decision of 23 March 2017, unanimously concluded that Article 2(1) of the European Social Charter (reasonable duration of daily and weekly working hours with progressive reduction of the latter) is violated, due to the excessive permitted weekly working hours and the lack of adequate guarantees for collective bargaining (the framework within which they will operate). Under its 3rd evaluation (March 2024)¹⁵, ECSR found that Greece has not taken measures to comply with this decision.

The 7th national report with regard to Article 2(1) of the revised ECSC does not meet critical reporting obligations, such as a) the clear presentation of the provisions of the national legislative framework on working time that fall within the reference period of the national Report, b) the clear presentation of the provisions of the national legislative framework, up to the time of submission of the national Report, especially in the case where they substantially change the content of the provisions to be examined, so as not to render the examination by the ECSR devoid of content, c) the presentation of the national legislative measures related to the due implementation and the compliance to the rev. ESC's provisions under examination.

With regard to the manner of presenting the provisions of the national legislative framework GNCHR would like to observe, that the reference primarily to the basic legislation related to the application of the ESC's provisions, followed by the reference to

¹⁵ European Committee of Social Rights (March 2024): [Follow-up to decisions on the merits of Collective Complaints](#), Findings 2023 (adopted in January 2024).

the relevant provisions of the Labor Code, would better serve the need for legal clarity on the reporting process in order to contribute to the correct depiction of the prevailing situation in Greece.

As it concerns the due implementation of art. 2 of the rev ESC, the GNCHR, within the framework of its institutional role as the Greek NHRI, consistently monitors the developments in the national legislative framework for working time under the light of the fundamental principles on the protection of working time, which focus on safeguarding workers' health, safety, and work-life balance. Given the reference period of the current reporting cycle, the National Commission's would like to recall and refer again its observations on the Bill of Law 4808/2021, which were included in the Commission's observations on the 5th National Report.

The provisions of the legislative framework in force since 2021 concerning the organisation and duration of working time and employees' annual leave, as well as their impact on workers' health and safety, have already been subject to regular review, as well as to the examination of complaints against Greece and findings of violations by the competent international supervisory bodies of the Council of Europe¹⁶ (European Committee of Social Rights, ECSR) and the International Labour Organization (Committee of Experts on the Application of Conventions and Recommendations, CEACR).¹⁷

As it has been steadily underlined by the GNCHR since 2021 and repeated in 2025¹⁸, based on the relevant decisions and general principles governing the interpretation and application of European and international labour standards, multiple violations have been identified in Greece, notably:

- **Excessive working hours:** The regulatory framework allows very high weekly working limits (even exceeding 60 hours), breaching the European Social Charter and ILO Convention No. 1, and lacking sufficient safeguards for collective bargaining.
- **Weakening of collective bargaining:** Successive restrictions have undermined workers' ability to effectively participate in determining and improving their working conditions, including working time and leave.
- **Insufficient guarantees in labour regulation:** The deregulated framework for collective agreements has shifted the regulation of working conditions to the enterprise or individual level—where employers hold dominant power—and fails to ensure reasonable limits on working time, resulting in non-compliance.
- **Non-compliance with core standards on working time:** Rules on working hours must (i) ensure reasonable daily/weekly limits, (ii) be set within a framework providing adequate safeguards, and (iii) include reasonable reference periods for averaging working time—conditions not adequately met.

¹⁶ European Committee of Social Rights (March 2024): [Follow-up to decisions on the merits of Collective Complaints](#), Findings 2023 (adopted in January 2024), European Committee of Social Rights (March 2023, [Conclusions](#) 2022 Greece.

¹⁷ ILO CEACR, ILO C 1, [Direct Request Greece](#), Hours of Work (Industry) Convention, 1919 (No. 1), 2015

¹⁸ GNCHR, [Observations of the draft bill of Law 5239/2025](#), 10 October 2025, pp 12-17.

- **Strict limits and overtime control:** Maximum working hours under international conventions are strict limits that cannot be waived; overtime should not be left to employer or employee discretion, and exceptions must be agreed collectively. Arrangements allowing up to or over 60 hours per week are considered unreasonable.
- **Violations concerning annual leave and health and safety:** Greece fails to ensure proper enjoyment of paid annual leave (including non-substitution with sickness), protection of workers in hazardous occupations, and the entitlement to at least two weeks of uninterrupted rest.
- **Deficiencies in remuneration and new forms of work:** There is non-compliance regarding pay for work on public holidays, rest day entitlements, and gaps in regulating additional work—especially for teleworkers and platform workers—as well as in working-time arrangements based on individual agreements.
- **Excessive working hours in practice:** Greek workers consistently record among the highest annual working hours in Europe, significantly above EU averages.
- **Impact on health and work-life balance:** Long working hours adversely affect health and work-life balance; EU law requires systems to measure actual working time to safeguard maximum limits and minimum rest periods.
- **Lack of impact assessment on vulnerable groups:** There has been no thorough assessment of how these measures affect vulnerable groups (e.g. women, young workers, migrants, persons with disabilities), while available data indicate detrimental changes in working conditions—sometimes without workers’ consent. Greece has also been condemned for instances of forced labour linked to inhuman working hours (e.g. *Chowdury and Others v. Greece*).

The evolution of the national legislative framework on working time in the period 2021-2024

Law 4808/2021 (GG A’ 101/19-6-2021)

The GNCHR, since 2021 and with its Observations on the Draft Law of the Ministry of Labor and Social Affairs “On Labor Protection - Establishment of an Independent Authority “Labor Inspection” - Ratification of Convention 190 of the International Labor Organization on the Elimination of Violence and Harassment in the World of Work - Ratification of Convention 187 of the International Labor Organization on the Framework for the Promotion of 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” (after Law 4808/2021)¹⁹, has already underlined the impact of the introduced provisions on working time on the due protection of labor rights. It has been reminded that the 1975 National General Collective Agreement on the Working Hours of Employees established 40 hours as weekly working time, corresponding to a five-day workweek or 6 hours and 40 minutes in a six-day workweek, with increased pay for

¹⁹ GNCHR, [Observations on the draft bill of Law 4808/2021](#) (Government Gazette A’ 101), 10 June 2021, pp 54-58.

each additional hour of work, while Directive 93/104/EC, amended by 2000/34/EC and subsequently by Directive 2003/88/EC, constitutes the basis for the formation of working time. In particular, Article 3 of the Directive provides for a minimum duration of daily rest, while Article 16 introduces the concept of a “reference period” in such a way that the duration of the weekly rest (24 hours) as well as the maximum weekly working time (48 hours) are calculated not on a fixed weekly basis but within a period of 14 days for the first case and 4 months for the second case. Furthermore, the Revised European Social Charter, ratified in Greece by Law 4359/2016, links the obligation to adopt a reasonable duration of daily and weekly employment with the increase in productivity, i.e. the increase in the profit rate of enterprises.

Law 5053/2023 (GG A 158/26.09.2023)

In September 2023, further amendments were introduced in the national legislative framework on working time, with the adoption of Law 5053/2023 (GG A 158/26.09.2023) “For the strengthening of employment - Incorporation of Directive (EU) 2019/1152 of the European Parliament and of the Council of 20 June 2019 - Simplification of digital procedures and strengthening of the Employment Card - Upgrading the operational operation of the Ministry of Labor and Social Security and the Labor Inspectorate”. The new measures provided, among other measures, for i) the introduction of probation period of 6 months in employment contracts of indefinite duration or of the $\frac{1}{4}$, with a maximum of 6 months, of the total duration in fixed term contracts, while maintaining employer’s right to terminate indefinite-term contracts within the first 12 months without notice or severance pay (art. 4 and 19, included as art. 2 and 336 respectively to the Labour Code), ii) the obscure availability of workers through contracts of “on demand” work, though which they pre-agree to avail themselves for the provision (in principle) of a minimum number of working hours that are not less than $\frac{1}{4}$ of total agreed hours, after a prior written notice by the employers, which (in principle also) could not be given less than 24 hours (with exceptions, art. 6, included as art. 73 to the Labour Code), iii) the extension of the five days working week, with the introduction of employer’s ability to ask the provision of work at the sixth (6th) day for 8 hours, (in principle) exceptionally (for enterprises with continuous operation) and in case of unpredicted work load (for the enterprises with non-continuous 5 days operation, that can extend it) (art. 25 and 26, included as art. 192 and 192 respectively to the Labour Code), iv) introduction of further exceptions on enterprises that can legally work on Sundays and public holidays (art. 27, included as art. 210 to the Labour Code), v) introduction of the right to agree on an individual basis of working time organization, issue regulated until now, only through collective agreements (art. 28, included as art. 202 to the Labour Code), vi) the extension of the capacity and deliverables of the central digital platform of ERGANI (now II) described in general terms by law, but mainly defined in their content through ministerial decisions, as provided to be issued for the extension of the application of the digital card and the 6th days’ working week (art. 9, 22, 25, 26, 32, as included in art. 199, 581, 192, 191, 532 respectively to the Labour Code), vii) the, indirectly introduced, obligation of the independent authority of Labour Inspection, after its detachment, to fulfil its mandate and provide its work on the inspection of labour law application in conformity with the guidelines given by the Ministry of Labour, not through normative acts (i.e. legislation or ministerial decisions), but through “circulars”, i.e. soft law administrative instructions.

GNCHR has submitted its opinion on the Bill of Law 5053/2023²⁰ and its observations, among others, on the following critical aspects of working time protection:

- the new provisions for work on the 6th day of the week: the relevant provisions of Law 5053/2023 (art. 25 and 26) provide for the "exceptional" employment of workers on the 6th day of the week for up to 8 hours with a 40% increase in the daily wage in businesses that implement five-day work, whether they have continuous operation (article 25) or they are not by their nature of continuous operation, in case of "unpredicted particularly increased workload" (article 26). Both of these provisions, which were initially introduced in the Individual Labor Law Code (articles 182C and 182B of Presidential Decree 80/2022) don't define these vague legal concepts ("exceptional", "unpredicted particularly increased overload", as they contain a similar provision for the issuance of Ministerial Decisions for the procedure of registering this additional day in PS ERGANI II and any other relevant issue for their implementation. At the same time, in the Individual Labor Law Code, article 186 contained the provision of article 8 of Law 3846/2010, which also regulates the issue of work on the 6th day and provides that it is illegal, and in addition to the foreseen sanctions, should be compensated with an increase of the daily salary by 30%. It should be mentioned, that the low percentage of declared work on Saturdays, derived from data of the central information system PS ERGANH II, is not due to the reduced use of this measure, nor to changes in legislation, but to administrative restrictions on the access of all businesses to declare it digitally;
- despite the positive side of the provisions on the digital card, its implementation was promoted in conjunction with the new measures on working time, characterized by extensive flexibility, both implemented not by ad hoc Ministerial Decisions but through the ones that regulate the use of the Information System ERGANI on the several aspects of working time declaration. Along with the time of the measures' implementation (July 1st, 2024) at the pick of the heatwaves, where normally measures on the reduction of working time should be implemented vigorously, these successive and cumulative measures have created an environment of confusion for workers, also for the Labour Inspection, and extensive abusive behaviours at the expense of workers' rights, their health and safety and their need to reconcile working and family/private life, especially those related to the extra 8 hour work on the 6th day (with no right for rest day), the work on Sundays, the extended overtime and the pressure to agree individually to an organization of working time;
- there has been a strong reaction, especially by trade unions, to the adoption and the implementation of these measures on working time²¹. Meanwhile, these measures have raised international interest on the situation of working time in

²⁰ GNCHR, [Observations on the draft bill of Law 5053/2023](#), September 2023, pp 35-46.

²¹ Ministry of Labour [Press Release on the implementation of digital card and the provisions related to work at the 6th day of the week](#). See also, [GSEE Press Releases](#).

Greece²². It should be also mentioned that the European Commission, in its answer to a parliamentary question, has reserved the right to take position on the legitimacy of these provisions stating that *“since this Greek law also contains new provisions regulating working time and other working conditions, the Commission has to make a full assessment of compliance of the provisions of law nr. 5053/2023 with all applicable EU acquis”*²³.

Further critical amendment in 2025 of the national legislative framework on working time

In examining the national legislative framework for the implementation of 2 par.1 with regard to the State’s obligation to take restorative measures for its due implementation, it is crucial that the additional legislative changes adopted and put into practice in 2025 with Law 5239/2025 (GG A 178/17.10.2025) should be also assessed. It is noted that the 7th national Report provides data on inspections by the Labor Inspectorate in 2025 (e.g. for the period 6/2025 to 9/2025) without, however, making the required reference to the legislative framework governing these inspections.

The new measures, in force since October 2025 under Law 5239/2025 are the following: with regard to working time and annual leave of workers, the possibility of providing work for 13 hours per day for the same employer (article 7 of Law 5239/2025/article 194 KED); the possibility of organizing working time on a weekly basis (article 8 of Law 5239/2025/article 202 KED amending article 41 of Law 1892/1990); the possibility of additional employment (overtime) in rotation work (article 6 of Law 5239/2025/ 113 of KED, amending article 38 of Law 1892/1990); the facilitation of the use of overtime employment through the important reduction in social security contributions for the 5 hours overtime work at the employers’ discretion, the additional overtime work and the work at night, Sundays and holidays (article 73 of Law 5239/2025, amending article 41 of Law 5184/2025); the reduction only to 5 consecutive days from 10 (for a 5-day week) or 6 days from 12 (for a 6 day-week) of the obligatory minimum period of annual leave’s split, thus allowing the fragmentation of the annual leave with no limit (art. 10 of Law 5239/2025/art. 225 of KED, amending art. 8 of Law 549/1977) in combination with the abolition of the employer’s obligation to declare worker’s annual leave prior to its take-up (art. 9 of Law 5239/2025/art. 224 of KED, amending art. 4 of Law 539/1945); the possibility of the employer to consider the unjustified absence of 3 days from work, as voluntary resignation of the worker, without obligation to pay compensation (art.14 of Law 5239/2025/art. 303 of KED, amending art. 38 of Law 4488/2017); granting employers the opportunity to employ workers with fixed-term contracts of 2 days (art. 21 of Law 5239/2025/art. 578 A of KED); introduction of a flexible arrival of up to 120 minutes with an impact on what is considered as preparation time (art. 22 of Law 5239/2025/ art. 580 of KED, amending art. 74 of Law 4808/2021).

²² See indicatively the following: DW, [Greece introduces the six-day work week](#), 21/06/2024. [New York Times](#). Euronews, [Controversial six-day workweek begins for some Greek businesses](#).

²³ [Question for written answer](#) E-002956/2023 to the Commission, 5.10.2023.

All the above-mentioned provisions, which comprise the legislative framework of reference in force for the implementation of article 2 paragraph 1 of the rev,ESC, have significant influence on its upcoming evaluation, while indicate the seriousness of the lack of sufficiently comprehensive data of the 7th National Report.

The new provision on the 13-hour work in the same employer (art. 7 of Law 5239/2025/art. 194 KED, amending art. 4 of Law 2874/2000)

GNCHR observes that under the previous legislative framework, which is presented as in force in the 7th National Report, the possibility of parallel employment for several employers was foreseen, while the employer had the possibility of employing the worker overtime for up to 3 hours per day. Under the legislative provisions in force, which should be included in the national Report so as to present coherently the state of play of ESC's art. 2 implementation in Greece workers can work overtime for up to 4 hours per day, while at the same time the maximum daily employment time for the same employer is increased (8 hours + 1 hour of overtime at the discretion of the employer + 4 hours of additional overtime). This has the effect of circumventing the 11-hour daily rest, especially if we take into account a) the time spent commuting to and from work, b) the break time, which, under the legislation in force, is not considered as working time and c) the preparation time (in accordance with art. 22 of Law 5239/2025). Thus, in practice, it is obvious that the 11-hour rest period is being violated, despite the fact that under Directive 2003/88/EC, it is recognized as a minimum standard of protection. The argument invoked that these provisions do not change the situation, since 13-hour work for two employers has been already in force in Greece, is unfounded. This is because the possibility of working up to 13 hours per day for two different employers, introduced by Article 9 of Law 5053/2023, cannot justify a further deterioration of an already highly problematic situation. It should be emphasised that employment with two different employers is, at least in principle, a matter of workers' individual choice. By contrast, permitting a 13-hour working day for a single employer would, in practice, significantly reduce workers' ability to refuse such working arrangements and could effectively transform what is currently a voluntary choice into an employer-driven requirement. The 9th hour of daily work (overtime at the discretion of the employer) is already mandatory by law (while the institution of this type of overtime is an originality of the Greek legislator, in order to increase, at the employer's discretion, workers' daily working time by one hour). The remaining four hours after the 9th (10th, 11th, 12th and 13th) become mandatory for the worker, since, as provided in article 659 par. 1 of the Greek Civil Code "*if there is a need for work beyond what is agreed or customary, the worker must perform it, provided they he/she is able and his/her refusal goes against good faith*". Thus, according to this provision, there is in principle an obligation for the worker to provide additional work, while he/she can refuse it only when his/her refusal is not contrary to good faith. Workers are required to invoke and substantiate the reasons for refusing to perform additional work in order to avoid adverse consequences, including being considered unjustifiably absent or even the termination of their employment relationship. However, even if the worker's consent to overtime work between the 10th and the 13th hour is considered necessary, this "consent" is usually not a product of free will, given the inherent inequality of the employer-worker relationship, which is also reinforced by the prevailing precariousness in the Greek labor market. The provision in

article 16 of Law 5239/2025 (350 KED, amending art. 66 of Law 4808/2021) that is, that the dismissal of a worker who refuses to provide overtime work is invalid, a rule that is not new to the Greek legal order, can be circumvented by the employer, who has the option of filing a complaint, denying that the dismissal was dictated by the worker's refusal to provide overtime work. Moreover, after the abolition of the provision on the valid reason for dismissal, the employer is not obliged to justify the termination on his initiative of the employment contract.

The impact of the over-employment of overwork among Greek workers on their health and safety is severe and is reflected in the increasing number of occupational accidents, particularly fatal accidents. The new provision on the 13 hours of daily work further expands the scope of exceeding working hours, to the detriment of the health and safety of workers, leading to their work burnout and dissolving any concept of their personal and family life.

It should be noted that, although rapid technological developments have long created the conditions and reignited the debate on reducing working hours without reducing wages, Law 5239/2025 further erodes even these minimum protective standards. In particular, it normalises, inter alia, 13-hour working days for the same employer at a time when statistical data have, for years, consistently confirmed the prevalence of overwork among workers in Greece in comparison with other EU Member States. At the same time, low wages combined with the high cost of living - which further erodes the purchasing power of wages - increase workers' need to undertake additional work, within a broader context of the individualisation of labour relations, a situation which these provisions further intensify.

It should be noted that under the provision of article 73 of Law 5239/2025 on the abolition of social security contributions to overtime payment, as well as the payment for work at night, on Sundays and on holidays, there is another incentive for employment of existing employees in the company, instead of hiring new employees, since overtime, work on Sundays, holidays, at night, etc. become cheaper, while at the same time workers' rights are furtherly endangered, since the National Social Security Fund's (EFKA) revenues from social security contributions is reduced. Social security contributions are acknowledged as "wage in the broad sense", as they constitute an additional element of work compensation, which (compensation) is not limited to the regular earnings.

Organisation of working time (also) on a weekly basis (art. 8 of Law N. 5239/2025/art. KED, amending art. 41 of Law 1892/1990)

Working time organisation is a system for the allocation of working hours based on the balancing of periods of increased working time with corresponding periods of reduced working time within a specified reference period. Under previous legislative interventions (article 59 of Law 4808/2021, article 28 of Law 5053/2023), which are not mentioned in the 7th National Report although they are crucial for the reporting period, the definition and implementation of the working time organization system essentially belongs to the managerial power of the employer, who has another tool for introducing further work flexibility and avoiding payment of overtime work. The legal

requirement for the absence of a trade union or of an agreement between a trade union and the employer as a precondition for the employer to conclude an individual agreement with the worker on working time organisation is not particularly meaningful in practice, given that in Greece approximately 99.9% of enterprises are micro, small, and medium-sized (SMEs), where due to the small number of workers, no trade unions exist. Moreover, in practice, employers are unlikely to conclude collective agreements on such arrangements when the same working time organisation can be implemented through individual agreements with employees. This is the main reason why there aren't any collective agreements on working time organization, which also explains why the 7th national Report doesn't contain any official data on that issue.

According to the legislation in force until 2025, two systems of working time organization are provided: one on a six-monthly and one on an annual basis. Law 5239/2025 provides for the possibility of agreeing on the organization of working time also on a weekly basis, while during the period of reduced employment, in addition to the reduced hours or days off, it is provided that an increase in annual leave with pay may be granted. Thus, in the framework of the promoted working time organization on a weekly basis, a 10-hour daily work in a 4 days' week and a granting of leave on the 5th day may be "agreed". This system can last up to 12 months. The argument invoked, that this measure will supposedly serve working parents, is unfortunate, since it ignores the reality of the non-existence or inadequacy of public structures for the care of children, especially during the days of increased parental employment. Consequently, this measure does not serve the balance of professional and family life, as announced. Furthermore, the four-day 10-hour working week, which is also provided for by Law 5239/2025 (article 7), essentially means that additional work (overtime) will be provided without additional pay, in exchange for a day off or an extra day off. The organization of working time in periods of less than six months, e.g. on a weekly or even monthly basis, essentially means that the work is fully adapted to the needs of the company, instead of the latter hiring additional staff to cover them. With the already existing flexible working time arrangements, there are greater risks to the health and safety of workers caused by their over-employment, given that, according to the current legal framework, even during the period of reduced employment, overtime work of the worker is allowed with the increases provided for their payment (overtime at the discretion of employer 20%, additional overtime 40% when is legal and 120% when is illegal, i.e. not declared).

Overtime work in rotation work (art. 6 of Law N. 5239/2025/113 KED, amending art. 38 of Law 1892/1990)

Rotation work is considered to be employment for fewer days per week or fewer weeks per month or fewer months per year or a combination thereof, based on full daily working hours. In the Greek legal framework, the measure of rotation work indicates either limited enterprise's needs to be met or (in the case of unilateral imposition) a limitation of the economic activity of the enterprise, which is of such extent and intensity as to justify dismissals. Therefore, the existence of a need to provide additional work through overtime employment of the worker with rotation work contract, nullifies the reason for applying rotation work and requires its conversion into full-time or the

recruitment of new personnel. Thus, the new provision on the overtime work of workers under rotation work contracts undermines full-time employment and prevents new recruitment of personnel.

New type of fixed term employment contracts with (max) 2 days duration per week (art 21 of Law 5239/2025/ art. 578 A KED)

Article 21 of Law 5239/2025 provides employers with the opportunity to hire workers in order to meet urgent needs with a fixed-term employment contract, lasting up to two (2) days per week, through a special electronic application under the title "Rapid Recruitment". The worker receives a notification of the proposal to conclude the contract through the electronic application "MyErgani", and must accept it, through the same electronic application, before the start of employment. According to this provision, a contract may be concluded for the provision of 2 days of work, which may be provided, consecutively or not, within a period of one week.

The wording of the provision "contract for up to two (2) days per week" creates confusion with rotation work: Rotation work is considered the employment for fewer days per week or fewer weeks per month or fewer months per year or a combination thereof in full working hours per day. The 2-day contract can be included in the concept of rotation work only if it is agreed: a) full daily working hours and b) when the work is agreed to be provided 2 days each week within a certain time period determined in broader time periods (e.g. month, semester, year, etc.).

Therefore, the new provision introduces a form of extreme flexibility of the employment contract, which, since the law does not distinguish, can be full-time or part-time or even involve a contract on demand. This means that the employer can make use of more non-standard (precarious) forms of employment.

An example of such a contract, as presented to GNCHR Plenary by its Member appointed by the Greek General Confederation of Labour, could concern the provision of work for 2 days a week (e.g. Saturday and Sunday or Friday and Sunday etc.):

- ***either*** with a full time 13-hour/day employment, including 1 hour overtime at the discretion of the employer and 3 hours additional overtime work
- ***or*** part-time work, e.g. 4 or 6 hours/day, with the possibility of providing additional work (with a 12% increase). This additional work can be provided, if the worker "agrees", even at a non-consecutive period of the same day.
- ***or*** by a contract on demand, in which, for example, the working hours of the two working days in the week are agreed upon as well as the employee's notice period, which cannot be less than 24 hours. The employer may, according to the law, invoke circumstances that objectively justify a shorter notice period. In this case, there is no longer an obligation to agree on a minimum number of paid working hours, since article 21 of the same Law 5239/2025 abolishes a) the obligation of the parties to agree on a minimum number of paid working hours, which cannot be less than one quarter (1/4) of the agreed total number of hours, b) the application to these contracts of all protective provisions, in particular those regarding working time (daily and weekly rest, breaks, night work, etc.). Thus, "on-demand" contracts are transformed, with the new provision, into pure "zero-hour" contracts, without

any protection for the employee. Therefore, the employer can maintain a "reserve" of "free-of-cost" employees, without being obliged to provide any remuneration, in the event that he/she ultimately does not notify the worker to provide work.

ILO Committee of Experts on the Application of Conventions and Recommendations Observations and Direct Requests addressed to Greece

In the framework of the regular monitoring procedure on the implementation of ratified ILO Conventions No1 (Law 2269/1920, GG A'145/1.7.1920), No 14 (Law 2990/1929, GG A'163/11.5.1929) and No 106 (Law 1174/1981, GG A'182/13.7.1981), ILO CEACR has addressed to the Greek Government, through its Report²⁴, important Observations and Direct Request, while commenting, in a negative way, on the vagueness and precariousness of the national legislative framework. Indicatively, CEACR, while examining, among others, the provisions of articles 174, 189, 194 of KED (included in the 7th national Report), as well as the above-mentioned provision of Law 5239/2025, it states:

CEACR Observations

"Articles 2(c), 4 and 5 of Convention No1. Variable distribution of normal hours of work over periods longer than a week. Circumstances and limits. (...) The Committee observes that none of the above provisions sets any precise circumstances for resorting to averaging of working hours. In this respect, the Committee recalls that: (i) the averaging of hours of work in general is authorized in the Convention only over a reference period of one week, and provided that a daily limit of nine hours is required (Article 2(b)); and (ii) in all the other cases in which the averaging of working hours is allowed over reference periods longer than a week, the circumstances are clearly specified, as follows:

(i) in case of shift work, it shall be permissible to employ persons in excess of 8 hours in any day

and 48 hours in any one week, if the average number of hours over a period of three weeks or less does not exceed 8 per day and 48 per week (Article 2(c));

(ii) in those processes which are required by reason of the nature of the process to be carried on continuously by a succession of shifts, the daily and weekly limit of hours of work may be exceeded subject to the condition that the working hours shall not exceed 56 in the week on the average (Article 4); and

²⁴ [Report of the Committee of Experts](#) on the Application of Conventions and Recommendations 2025, 18 February 2026.

CEACR [Observations](#) 2025 on the application by Greece of ratified C1.

CEACR [Direct Request](#) 2025 on the application by Greece of ratified C1 , C14, C106.

(iii) in exceptional cases where it is recognized that the limits of 8 hours a day and 48 hours a week cannot be applied, agreements between workers' and employers' organizations may fix a longer daily limit of works, provided that the average number of hours worked per week, over the number of weeks covered by any such agreement, shall not exceed 48 (Article 5).

The Committee requests the Government to take the necessary measures to bring the above provisions into conformity with the requirements of the Convention".

"Articles 3 and 6 of Convention No.1. Exceptions to normal hours of work. Circumstances and limits on the number of additional hours (...) In this respect, the Committee observes that: (i) as a result, an employee may work up to 13 hours per day (eight normal working hours, one hour of "overwork" and four hours of overtime); and (ii) with regards to "exceptional overtime" (overtime that is not approved through the formalities and procedures provided for in the law), no maximum limits and circumstances are set. The Committee also notes that in its observations, the GSEE indicates that Law No. 4808/2021 increased overtime limits from 120 to 150 hours per year, with the possibility of further increases through Ministerial Decisions (section 58 of the Code of Labour Law).

In this regard, the Committee recalls the fundamental importance of prescribing clear statutory limits for additional hours of work and of keeping the number of additional hours allowed within reasonable limits that take into account both the health and well-being of workers, and the employers' productivity needs (2018 General Survey on working-time instruments, paras 151 and 179). It also recalls that temporary exceptions to normal hours of work are authorized in the Convention in very limited and well-circumscribed cases. ***The Committee requests the Government to take the necessary steps to define the exceptional circumstances under which normal hours of work may be increased in industrial establishments and to set clear statutory limits for overtime in accordance with the Convention".***

CEACR Direct Request

Article 8(1)(c) of Convention No. 1. Record of additional hours. The Committee notes that in its observations, the GSEE indicates that the implementation of the recently introduced ERGANI II Information System on digital organization of working time has caused confusion and led to abusive practices. ***The Committee requests the Government to provide information regarding the application in practice of the digital organization of working time and, in particular, whether abuses have occurred or can be detected.***

Article 2(1), (2) and (3) of Convention No. 14 and Article 6(1), (2) and (3) of Convention No. 106. Right to weekly rest. Uniformity of weekly rest. Respect of traditions and customs. The Committee recalls that the principle of uniformity enshrined in Article 2(2) of Convention No. 14 and Article 6(2) of Convention No. 106 refers to the collective character of weekly rest with a view to ensuring, wherever possible, that it is taken at the same time by all workers on the day established by tradition or custom. The social purpose of this principle is to enable workers to take part in community life and in the special forms of recreation available on certain days (2018 General Survey on working-time instruments, para. 202). ***The Committee requests the Government to indicate the manner in which***

it is ensured that weekly rest is, whenever possible, granted simultaneously to the whole of the staff of each undertaking and so as to coincide with the days already established by the traditions or customs of the country or district, as required in Article 2(2) and (3) of Convention No. 14 and Article 6(2) and (3) of Convention No. 106.

Main recommendations of the Greek National Commission for Human Rights as it concerns the due protection of the right to reasonable daily and weekly working hours

The GNCHR, in its overall assessment of the introduced provisions on working time since 2021 (Laws 4808/2021, 5053/2023 and 5239/2025²⁵), with special emphasis to the provisions which are related to core labour rights and protection, such as daily and weekly working hours, annual leave, health and safety of workers (e.g. the regulations for the addition of a 4th hour of permitted overtime employment, expanding the legal employment of employees to 13 hours - a total of 13 hours/24 hours - with one employer, the possibility of additional/overtime employment in both part-time and rotational work, even when this is imposed unilaterally by the employer, the expansion of the possibility of individual organization of working time from one week to 12 months, the formation of a new type of 2-day employment contract, the abolition of the minimum limit of 2 weeks of continuous annual leave days), notes, among others, that:

- the amendments on critical labour provisions are scattered in the legislation, which despite its administrative codification, is constantly amended through other regulatory acts, such as Ministerial Decisions and administrative Circulars, which not only makes it difficult to understand their exact content, but most importantly have a key impact on the legal certainty required for their implementation by both employers and employees, competent inspection Authorities and the Courts;
- there is a further expansion on the ways of regulating the duration and organization of workers' working time at an individual level, which, in parallel with the increase in the limits of overtime work, is expected to have an additional serious impact on their health and safety, while reducing the range of the content but also the possibility of being part of regulations agreed through collective labour agreements,
- the legislative framework in force until 2023 on the organization and duration of working time and annual leave of employees, to which additional flexibilities are introduced, have already been the subject of regular monitoring, as well as examination of complaints against Greece and the finding of violations by the competent

²⁵ GNCHR, [Observations on the bill of Law 5053/2023](#), 20 September 2023. GNCHR, [Observations on the bill of Law 5239/2025](#), 10 October 2025.

Law 5053/2023 (GG A 158/26.09.2023) "For the strengthening of employment - Incorporation of Directive (EU) 2019/1152 of the European Parliament and of the Council of 20 June 2019 - Simplification of digital procedures and strengthening of the Employment Card - Upgrading the operational operation of the Ministry of Labor and Social Security and the Labor Inspectorate".

Law 5239/2025 (GG A 178/20.10.2025) "Fair work for all: simplifying legislation – supporting employees – ensuring protection in practice – pension arrangements and other provisions"

international monitoring bodies of the Council of Europe and the International Labor Organization, with the decisions and recommendations of which the required compliance has not been achieved to date,

- the flexible framework for regulating working hours and annual leave is expected to intensify the already existing phenomena of labor and economic exploitation and forced labor with vulnerable social groups as victims, such as foreign workers and women, and the underreporting that already characterizes these practices. The severe underreporting of labour violation, which is exacerbated by additional restrictive measures, such as those for the recognition and legal residence of asylum seekers, refugees and migrants,
- digitalization and new forms of work shape a new operating environment for labor relations, in which the required regulatory and procedural synthesis and coherence between digital governance and protective labour rules, principles and practices must be pursued and achieved, with the constant challenge of addressing the persistent digital gap,
- digitalization of labour law practical implementation can have a positive aspect when it is accompanied by the explicit incorporation of the right to information, the right to object/withdraw, the right to express reservations and the existence of guarantees of transparency and accountability of the employer's practices, without creating an accountability gap. Digitalisation is not just a technical procedural process, given that it has a substantial impact on the legal position of the worker and his rights,
- a (gradual) abolition is observed, through the procedural provisions for the digital organization of work, of a basic pillar of individual labor law, which is the written individual employment contract, which is not a procedural stage, but an essential parameter of the legal relationship created in the context of the provision of dependent employment,

More specifically, GNCHR²⁶ expressed its concern regarding the observed (gradual) abolition, through the procedural provisions on the digital organisation of work of a fundamental pillar of individual labour law, namely the written individual employment contract. This concern is even more pronounced in cases where enhanced guarantees and transparency are required for the employee, and where the written form constitutes a prerequisite for the lawful provision of work, such as in part-time and rotational employment (Article 38 Law 1892/1990, Article 113 Labour Code), employment contracts with the public sector (Article 130 Law 4270/2014), renewals of fixed-term contracts (Article 5 para. 2 PD 81/2003, Article 98 Labour Code), and temporary agency work contracts (Article 124 Law 4052/2012, Article 125 Labour Code). The same applies to the request upon invitation for seasonal work procedure (metaklisi), under which a written employment contract constitutes an indispensable prerequisite for the issuance of a visa and provides an essential safeguard for the protection of third-country national workers upon their arrival in Greece for the purpose of employment.

²⁶ GNCHR, [Observations on the bill of Law 5239/2025](#), 10 October 2025.

As rightly observed, the written individual employment contract (whether mandatory or chosen by the contracting parties) must not be confused with the notification of working conditions, nor with the proposed instrument intended to fully replace it, namely the “Digital Declaration of Commencement of Employment”, which the employee accepts prior to the commencement of work through new digital means. It is not certain that such means are used without difficulty, nor that, in the case of foreign workers, the terms to which they digitally provide their consent are immediately and/or fully understood, particularly where no written individual employment contract is provided²⁷.

Consent to the acknowledgement of working conditions cannot substitute the individual employment contract, since the former constitutes an act of transparency within the relevant procedure, whereas the employment contract constitutes the substantive legal foundation of the employment relationship²⁸. In the event of a dispute, the mere acknowledgment that the employee was informed of the terms is not sufficient, as it does not demonstrate agreement with them as a binding arrangement, but only serves as proof of information, not acceptance. Consent to the knowledge of the terms constitutes a complementary element and an obligation of the employer, but cannot replace the contract as an autonomous legal act.

Digitalisation has a positive dimension when accompanied by the explicit incorporation of the right to information, the right to objection/withdrawal, the possibility of expressing reservations, and guarantees of transparency and accountability of the employer, without creating gaps in accountability. The digital option is not merely a technical procedural detail, as it has a substantive impact on the legal position of the employee and their rights. Furthermore, digital consent must be linked to strong identifiable elements of the employee and must be explicit, free, and informed, as the employee must have clear, complete, and comprehensible information in simple and accessible language regarding the content of the contract, as well as access to the digital document at any time.

²⁷ It should be recalled that, within the meaning of “essential” working conditions—regarding which there is an obligation to provide prior information to employees—additional terms of employment have also been incorporated through specific legislative provisions. For example, pursuant to Law 4961/2022 (Article 9) on “Emerging information and communication technologies, strengthening digital governance and other provisions”, an obligation is introduced for employers, whether in the public or the private sector, to inform employees about the use of artificial intelligence systems. This obligation, by express provision, also extends to digital platforms within the meaning of Article 68 of Law 4808/2021, in relation to natural persons engaged with them under contracts of dependent employment, independent services, or project-based contracts.

Furthermore, an issue arises as to the application of the proposed provisions within the framework of specific legislative rules, such as those governing the obligation of prior notification of terms and the requirement of a written employment contract in cases of admission of third-country nationals for employment and the entry of third-country nationals for the purpose of seasonal work (Articles 61 and 63 of the Migration Code, Law 5038/2023).

²⁸ See Article 6 of Law 5023/2023 concerning the obligation to provide information and the replacement of Article 70 of the Individual Labour Law Code, as well as Article 71 of the Code on the provision of information.

Moreover, the option provided in digital systems for the employee's signature—between simple “acknowledgement”, “agreement and acceptance”, or “acknowledgement with reservation”—produces different legal consequences. Indicatively, with “acknowledgement”, the employee is not expressly bound by terms that may be abusive, while even in the case of “agreement”, unlawful or abusive terms do not become valid. Labour law is protective in nature and must prevail. With “acknowledgement with reservation”, information is evidenced but acceptance is not necessarily implied, thereby strengthening the employee's position while preserving the right to challenge the terms. In all cases, alternatives should be available for the above declaration either in written form or via electronic means (e.g. email).

The law on the protection of personal data, as well as the framework of Directive 2019/1152 on transparent and predictable working conditions, must be applied to the benefit of the employee, with all the safeguards of rights embedded in the above-described process. Furthermore, the fact that the employee retains the right to challenge the terms before the Labour Inspectorate or the courts must be included in the relevant information. Consequently, it would be appropriate for the relevant information system to be suitably adapted, with alternative options in its core parameters, so as to ensure that employees have uninterrupted access to its applications and understand their essential content, given their direct connection to the terms under which they are called to provide their work.

- the level of protection and effectiveness of the promoted provisions for the health and safety of workers, is directly linked to the promoted provisions on the number and the organization of the working hours and the annual leave of workers, because they increase the risk to their health and safety and affect the accumulation of mental and physical fatigue in every form of work and professional specialty, much more so in heavy and arduous professions.
- unfortunately, in Greece, the increasing number of work accidents and especially fatal accidents is well known, while the number of occupational diseases is not unknown. This alarming situation has been also observed by European and international bodies, along with the fact of their under-reporting.

2. Article 3 - The right to safe and healthy working conditions

The GNCHR has consistently attached particular importance to the protection of individual and collective labour rights in Greece, especially in the context of successive crises, including the economic and public health crises, and the extensive restrictive measures adopted in response. This commitment is reflected in its Reports, Statements and other interventions, through which it has repeatedly stressed the State's obligation to assess, prior to the adoption of new legislative measures, the cumulative impact on labour rights of previously adopted restrictive measures, as well as the further promotion of flexible and precarious forms of employment. Such assessments should be conducted in light of the fundamental principles of the protection of decent work and

the safeguarding of workers' health and safety. Equally, the State must, as a priority and in practice, awaken to the dramatic increase in fatal occupational accidents due to dangerous or precarious working conditions and the threat to human life from extreme weather events and natural disasters.²⁹

The GNCHR would like again to recall that the 7th national Report on article 3 of the rev. ESC should provide the required clear information on the content of the national legislation and its practical implementation, so that, among other things, compliance with paragraphs 1, 2 and 3 of article 3 can be properly assessed by the ECSR in the current reporting cycle. In this context, the GNCHR echoes its Members' argument on the serious regulatory problems arising from the integration into the (administrative) Labour Code (KED) of the Greek Code of Laws on Health and Safety of Workers (KNYAE, Law 3850/2010), which constitutes a real and substantial codification of the crucial legislation on health and safety at work and has been adopted in accordance with the Greek Constitution through a parliamentary procedure. The inclusion of changes to the legislation in the relevant articles of the KED and not directly in the KNYAE, which also contains provisions for the incorporation of European legislation, as well as provisions for the implementation of the revESC and ratified ILO fundamental conventions on OSH, places the regulatory framework at high risk of legal uncertainty to the detriment of the interests of both employees and employers.

With a view to contribute to the needed assessment of the general context in Greece, the GNCHR has pointed out in its ad hoc Report in June 2024 on the cost-of-living crisis³⁰, before the ECSR, that this crisis is also a matter of human rights law. With the above report, it is pointed out that the current cost of living crisis indicates a crisis of dignity, autonomy, equality and solidarity. The crisis significantly affects the decent standard of living of the population, the percentage of the population living below the poverty line, economic and social exclusion. The formulation of "indicators" for monitoring the implementation of human rights requires their real and appropriate evaluation, economic and social, so that it is not pretentious. Human rights indicators include labor rights (individual and collective) and the directly related social security rights, both independently and in conjunction with other critical indicators, such as gender, age or vulnerability, which extends to many vulnerable groups; for example, people with disabilities, Roma, and migrant and refugee workers.

Health and safety at work are also key priorities based on the focus of the GNCHR so far. In this context, the GNCHR wishes to draw attention to the Committee of Experts' Direct Request, contained in its 2025 Report,³¹ concerning Greece's implementation of ratified ILO Convention No. 187. In particular, the Committee highlighted the serious

²⁹ GNCHR, [Observations on the bill of Law 5053/2023](#), 20 September 2023, pp 5-6.

³⁰ GNCHR, [GNCHR Additional Information - Observations to the European Committee of Social Rights of the Council of Europe on the ad hoc National Report on the cost-of-living crisis in the context of the European Social Charter](#), June 2024. See also GNCHR, [Observations on the bill of Law 5163/2024](#) (Government Gazette A' 199/06.12.2024), 4 Δεκεμβρίου 2024.

³¹ [Report](#) of the Committee of Experts on the Application of Conventions and Recommendations 2025, 18 February, 2026. See also GNCHR, [Observations on the bill of Law 5239/2025](#), 10 October 2025, (Government Gazette 178 A'/17.10.2025), pp 41-48 and reference on ILO CEACR, [Direct Request 2024](#) (published 113rd ILC session, 2025) on the application of C187. CEACR [Direct Request on the implementation of ratified ILO C187](#) and C 115.

deficiencies in the collection and availability of statistical data and the need for the State to address them without delay through the effective use of digital tools. It also emphasised the need for genuine and meaningful tripartite social dialogue in the design, implementation and evaluation of occupational safety and health policies, the establishment of effective coordination under a single central authority, and the activation of institutional cooperation with the Hellenic Institute for Occupational Health and Safety (ELINYAE), the occupational safety and health institution of the national social partners in Greece.³²

Domestic workers (art. 3 paras. 1 and 3)

The GNCHR concurs that the greek legislative system is characterized by unequal and inadequate protection to key working and social security aspects of domestic workers, given also the impact of further discriminative aspects such as the type of domestic work (live- in and live -out domestic workers), the legal status of workers (migrants or asylum seekers or refugees), multiple discrimination (based on gender or/and the other forbidden grounds), higher risk of undeclared work and abusive practices of intermediaries/employment agencies. In general, domestic work is considered as atypical and excluded, by legislation and practice, from labour law and important social security provisions. Furthermore, the extent of informal domestic work and the impossibility of monitoring it are wide. It should be also taken into consideration that an important part of domestic workers are third country nationals, whose vulnerability is also exacerbated by the restrictive migration policy as it concerns the conditions of their legal residence in the country.³³

Greece has neither ratified ILO C189 on domestic workers, nor there is a specific legislative framework on domestic work. Thus, domestic workers are more prone to suffer social exclusion and work informally beyond the scope of national labour legislation and enforcement mechanisms³⁴.

³² ELINYAE

³³ GNCHR, [Observations on the Draft Law of the Ministry of Migration and Asylum entitled: "Implementation of the Pact on Migration and Asylum and Other Provisions of the Ministry of Migration and Asylum"](#), 5 June 2026.

³⁴ There are no provisions, at least general, on important terms of work, such as food and accommodation (that many times are considered as part of work remuneration), the duration of breaks and weekly rest period, worker's protection in case of repatriation (i.e. when the residence permit expires, mostly without their fault) and the protection of domestic workers against abusive employers' practices on the probation period, especially after the recently adopted legislation on the 6months probation period and the automatic termination of the contract, if not renewed (art.4 L. 5053/2023 on the transposition of Dir 2019/1152). Furthermore, their access to Labour Inspection is limited, mostly due to the non-typical employment through the labour stamp ("ergosimo", or "voucher coupon" see below), but also to language obstacles (an indicative example is that the access to Labour Inspection as it concerns the submission of violence and harassment complaints is allowed only if the complaint is written in Greek (Ministerial Decision 101269/2021/GG B 5978 on the implementation of L.4808/2021 that ratified ILO C190). The non-retroactive character of domestic workers' social security rights is also important in the event that a complaint is filed, especially when they are not nationals and they have not a stable connection to the social security system. Thus, special working conditions of live-in workers and those employed part-time by numerous employers are not covered by the national legislation in Greece that would ensure due

Domestic workers are covered by the minimum wage protection (if their work is legally declared), but are excluded from the framework on working time and health and safety. In any case the distinction between live-in and live-out workers has practical impact on basic working terms. Live-in domestic workers (not the majority of domestic workers) are employed through employment contracts of dependent work usually of indefinite duration with right to minimum wage and full social security coverage (25 days/month) but excluded from the framework of working time protection and health and safety provisions. These employment contracts must be declared to the central Information System ERGANI, providing them with a minimum level of transparency as it concerns the employer, the place where the work is provided and the (declared) amount of their payment. Declared domestic workers can also follow their social security profile through their access to the Information System of EFKA (national social security entity) by using their identification codes to the tax system. Live-out domestic workers are exposed to greater flexibility and inequality, due to the fact that the basic employer's obligation of payment and social security is fulfilled through the labour stamp ("ergosimo"³⁵, or "voucher coupon"), with no other obligation such a written employment contract or declaration of their employment to the ERGANH system. Domestic workers employed through labour stamp are excluded from unemployment benefit coverage.

Workers in gig or platform economy, telework and self employed persons (art. 3 paras. 1 and 3)

GNCHR would like to raise an issue of general interest, after the assessment of the prima facie protective framework introduced in Greece in 2021 (Law 4808/2021, articles 68-72), which, instead of extending the scope of the existing institutional framework of individual and collective labour law to digital workers, has recognized anew the exercise of some individual (right to information on contractual terms, right to health and safety in abstracto) and collective rights (right to form associations, right to strike, right to conclude collective agreements). The progress invoked by the Government on the recognition of the ability to exercise labour rights is false, given that i) both the national

access to social security benefits, which are linked for example to work accidents, and regular remuneration, also ensuring the legality of employment.

[Further information](#) on undeclared work, with reference to domestic work and the state of play in Greece, could be found on ILO CAS 30.5.2022 Discussion on the General Survey "Securing decent work for nursing personnel and domestic workers", Greece's Worker Member intervention.

2) [ILO Technical Assistance Diagnostic Report on Undeclared Work](#) (2016), based on which a tripartite Road Map on undeclared work was adopted (unfortunately not fully implemented). ILO, [Roadmap for fighting undeclared work](#).

3) OBCT, [Between two families: stories of migrant domestic workers in Greece](#), 18/03/2019.

4) EP Committee on [Women's Rights and Gender Equality Report](#) on women domestic workers and carers in the EU 5.4.2016 - (2015/2094(INI)), whose Rapporteur was the elected MEP from Greece Kostadinka Kuneva, acknowledged trade union member from the cleaning sector, followed by European Parliament [Resolution](#) of 28 April 2016 on women domestic workers and carers in the EU (2015/2094(INI)).

³⁵ The labour stamp scheme (ergosimo) is a simplified method for employers to pay labor remuneration and insurance contributions regarding specific professions and sectors of the Greek economy. In the form of a special coupon-check, the ergosimo is usually issued by banks (also through e-banking) where it is also cashed in view of having the relevant amounts withheld and immediately paid to employees and the concerned (not full) social security contributions respectively.

system of rules on freedom of association and trade union rights and the system of rules on collective bargaining and collective agreements are based on the notion of dependent employment and ii) the newly introduced legislation on digital platforms, is based on the introduction by law (art 69 Law 4808/2021) of the negative presumption of non-existence of dependent employment relationship, given that the worker has the right, under his contract, to use subcontractors or substitutes, to provide its independent services to third parties, to determine himself the time for providing his services etc. Hence, the mere signing of a contract with the aforementioned content will generate a presumption to the detriment of the contract of dependent employment, according to which the worker, who is in fact providing dependent employment for a platform, is called upon to overturn it, by proving the true nature of his employment as dependent. Accordingly, the need to protect this category of workers requires primarily the establishment of presumption in favor of their dependent employment relationship. It should be also mentioned that the Greek national framework already contains since 2010 (Law 3846/2010, art 1) a positive legal presumption in favour of dependent employment relationship in cases where work is provided personally, solely or primarily for the same employer for nine consecutive months, from which it was decided to deviate as it concerns digital platform work³⁶. In any case, it should be noted that the misclassification of platform workers as by presumption providers of independent services or self-employed exposes them to financial and social risks, along with health and safety risks followed in most of the cases by lack of access to labour and social protection, while putting them automatically out of the control mandate of the Labour Inspectorate³⁷.

Challenges of digitalisation and labour law

Further, in connection with the issues of digitalization referred to above and the platform workers, there is a need to add the following. It is a fact that digitalisation and new forms of work are shaping a new operational environment for labour relations,³⁸ in which the necessary regulatory and procedural coherence must be achieved between digital governance and the rules and principles governing labour law and human rights law. A common challenge for policymakers is the persistent extent of the digital divide,

³⁶ Hellenic Parliament, [Observations of the Scientific Service](#) on Draft Law of Ministry of Labour and Social Affairs "On the Protection of Employment Establishment of the Independent Authority Labor 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" pp 35-38.

ETUC, [Platform Reps](#), Greece Country Report 2022.

GNCHR [Observations on Draft Law of Ministry of Labour and Social Affairs](#) "On the Protection of Employment Establishment of the Independent Authority Labor 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", August 2021.

³⁷ ILO, [Diagnostic report on bogus self-employment in Greece](#) and recommendations for reforms, 2019.

³⁸ ILO, [Digitalization and Employment – A Review](#), August 2022, p. 15.

as this inequality in access to and use of information and communication technologies constitutes a constant obstacle to the effectiveness of e-governance initiatives and limits the impact of digital transformation strategies on employment policies.³⁹

It is also evident that the digitalisation of data related to the provision of work, particularly when linked to their digital registration in information systems mutually accessible to employers and employees, may contribute—under certain conditions and in light of the fundamental principles of labour law protection—to the fulfilment of the obligation of transparency that must govern the terms under which work is provided. The digital work card and the recording of working time through direct connection to the ERGANI II information system constitute, indeed, a positive measure, which must be universally implemented with strict compliance and without deviations between different time-tracking systems. However, fragmentation of the relevant legislative framework regarding the operating conditions and data registration obligations within ERGANI II is observed, further exacerbated by the inadmissible regulation of obligations and rights through non-binding acts, such as circulars and announcements, mainly aimed at addressing issues arising from the operational functioning of the relevant applications.

Digitalisation within the framework of electronic formalisation processes (e-formality⁴⁰), without appropriate safeguards, combined with the digital divide, may lead to the emergence of multi-speed employees, through direct and indirect discrimination in their equal access to digital information that concerns and binds them, thus raising significant challenges for labour relations, working conditions and terms, and social protection in general. In this respect, recital 4 of Directive (EU) 2024/2831 on improving working conditions in platform work,⁴¹ which our country must duly transpose into the national regulatory framework, explicitly notes that digitalisation is transforming the world of work by improving productivity and enhancing flexibility, while also entailing certain risks for employment and working conditions.

The relevant provisions on the digital organisation of work and the development of specialised real-time information applications for employers and employees are, in principle, positive. However, where these are not accompanied by the necessary legislative guarantees and practical tools for the protection of employees, they entail risks in relation to the provision of informed consent, particularly for categories displaying increased vulnerability to unlawful and abusive practices, such as individuals lacking minimum digital skills, persons with disabilities due to inaccessible digital applications, and migrant workers, due to the need for assistance in understanding the

³⁹ ILO, [Digital transformation in employment policies](#), December 2024, p. 24.

⁴⁰ Ibid, p. 35-36.

⁴¹ Council of Europe, [Realising social rights in the age of digitalization: opportunities and risks – 13th meeting of the CoE-FRA-ENNHRI-Equinet collaborative platform on social and economic rights](#), 26 September 2023. Council of Europe, European Committee for Social Cohesion, [Report on the impact of digitalization and IT developments on Social Rights and Social Cohesion](#), CCS(2022)4, study completed on 8 February, indicatively p. 41.

language in which key information on working conditions is provided in digital applications.

Within this context, the NCHR considers that the addition of paragraph 3 to the new Article 577A of the Labour Code, promoted by Article 19 of the Draft Law regarding the facilitation of persons with disabilities in the use of the ERGANI platform of the ERGANI II system, is a positive development. However, it appears from the content of the proposed provision that it concerns employers with disabilities. The question arises whether a corresponding provision will also be introduced for employees with disabilities with regard to the use of myErgani. In any case, it is necessary to promote coherent regulatory measures in order to ensure compliance with accessibility requirements (Chapter H, Part A, Law 4727/2020) for persons with disabilities across all information systems and applications containing data that concern them and relate to the provision of work.

The GNCHR further observes that the use of digital tools, including those based on Artificial Intelligence,⁴² must facilitate improved information exchange with employees, employers, other competent public authorities, and the public, while automating reporting processes,⁴³ and at the same time addressing significant challenges such as transparency, access and accountability. Therefore, the exclusive access to digital data within ERGANI II solely by the Ministry of Labour and Social Security and the Labour Inspectorate, combined with the abolition of key documents previously available during workplace inspections, such as personnel registers and individual employment contracts, creates obstacles to the exercise of both individual and collective labour rights, including participation of employees in Labour Inspectorate inspections (Article 16 para. 7 Law 1264/1982, as in force). Finally, in order to mitigate negative impacts and leverage the opportunities of digitalisation, tripartite social dialogue, as promoted by the ILO, as well as the importance of social dialogue in the era of digital transition, may constitute key elements for ensuring the necessary guarantees for the protection of social rights.⁴⁴

⁴² ILO, [AI provides innovative ways to improve compliance with labour laws](#), 3 February 2025 and ILO, [Strengthening labour inspection systems for increased compliance with labour law through development cooperation](#), p. 6.

⁴³ ILO, [Transformative Technology for Decent Work \(TT4DW\)](#).

⁴⁴ ILO, [Digital transformation in employment policies](#), December 2024, p. 27. ILO, [ILO launches Global Policy Tracker on Digital Labour Platforms](#), 14 August 2025 with a reference to the need of support of the social dialogue. ILO-AICESIS, [The role of social dialogue and its institutions in combating inequalities in the world of work, Background report for the ILO-AICESIS Joint International Conference](#), 23-24 November 2023, p. 23 for the digital gap and the role of social dialogue. European Social Partners in the banking sector, [Joint Declaration on employment aspect of artificial intelligence](#), 14 May 2024, p. 2-4. Regarding the role of social dialogue in the digital transformation see ILO, [Social Dialogue Report 2024, Peak-level social dialogue for economic development and social progress](#), 2024, p. 118. European Economic and Social Committee, [Opinion: Social dialogue for innovation in digital economy](#), SOC/577, 2018.

Lack of data on the implementation in practice and control of OSH legislation.

National legislative framework shows satisfactory regulatory sufficiency, which has been reinforced through the ratification of ILO C187 (Law 4808/2021) and C155 (Law 5239/2025). However, the 7th national Report does not contain data on the practical implementation of the provisions under examination, in all the questions that Greece is required to answer regarding article 3 of the rev. ESC. This deficit generally characterizes the Greek reality in the field of occupational health and safety, along with the fragmentation of competency and responsibility for labor inspection policy and the central data base in the field of health and safety, between the Ministry of Labor and Social Security, the Ministry of Development and the independent Labor Inspectorate, as well as individual administrative authorities, such as the Mining Inspection Directorate.

Thus, even if the regulatory framework for health and safety in Greece is typically satisfactory, nevertheless the national system of occupational health (OSH) could be characterized as dysfunctional and ineffective, as it focuses more on formal compliance than on efficiency, a fact which is evidenced by a high and unfortunately increasing rate of occupational accidents and an unknown number of occupational diseases, as there is no record of them. Unfortunately, this situation is worsened by other factors as well, such as the non-prioritization of health and safety in the integration policies of foreign workers in our country (migrants, asylum seekers and refugees), despite the serious condemnation of Greece for inhuman conditions of forced labor and exploitation (see notably the ECtHR's Chowdury decision and the reports of international control bodies within the framework of the ILO and the UN). Characteristic provisions regarding this essential lack are the provisions on the request upon invitation ("metaklisi") for seasonal work (articles 13 and 18 of Law 4251/2014, as applicable, article 16 of Law 4783/2021 as applicable, article 5 of Law 4959/2022, article 6 Law 4959/2022, article 6 Law 5009/2023), the recent bilateral immigration agreements (i.e. between Greece and Bangladesh), the provisions of law 5078/2023 (article 190, 192, 193), which do not refer to and are not linked to the strict observance of health and safety obligations for the protection of workers (pls see our introductory remarks). Greece lacks an integrated OSH national policy, functional infrastructure, and accountability within its National OSH Strategy and annual program. This reflects a deficiency in prioritizing and cultivating a national preventative OSH culture.

OSH data – occupational diseases and accidents (art. 3 paras.1, 2, 3)

GNCHR underlines the obligation of the State to provide a coherent and reliable system for announcing and recording occupational accidents and morbidity. During the process of stakeholder's hearings, which GNCHR hosts according to its law with a view to enhance its information and shape its opinion on human rights' protection in law and practice, trade union and civil society organisations that have participated in labour and migration policy Bills hearings, have stressed the dramatic increase in labour accidents, including fatalities, the total lack of occupational diseases' recording, the lack of up-to-date information on labour accidents and their serious under-reporting, whose aspects

should be assessed as a matter of urgency (ie the pressure to employees not to declare their labour accident especially when their economic, social or legal status is vulnerable, the non-recording of the accidents as work-related by the other involved authorities (eg police declaration of labour accidents that happen in road as road accidents) or the nursing institutions, when declaring the reason of their treatment). The situation is exacerbated at the expense of workers, who are undeclared or falsely (under) declared as to their employment or are employed mainly through forms of insurance, such as the “ergosimo” (labour stamp, “labour voucher”) , or who do not have the linguistic ability to communicate with the authorities, alongside the everyday living insecurity, like foreign workers.

GNCHR would like to note that there is a substantial lack of data on the state of health and safety at work in the reference period since 2020 with indicators related to the quality of work and the impact of restrictive measures at the expense of labor rights. Critical and common, globally recognized indicators of quality of work such as decent wages and working time, working conditions and job stability, informal forms of employment, workplace safety and the quality of the working environment are not taken into account, as well as the quality of labor legislation.

The health and safety of workers is a horizontal issue and must in principle be dealt with in a unified manner on the basis of relevant scientific, technological, social and environmental developments and needs, with further specialization depending on the sector of activity and the profession of the workers. Procurement contracts, especially subcontracting, remain problematic areas for accidents, exposing workers to employer negligence and confusion about whom they are employed by. Given that Greece has not ratified ILO C94, the extent of this extremely problematic, but mainly dangerous for workers’ health and safety, situation has already been exposed and analyzed in 2009 by an ad hoc report of the Greek National Commission for Human Rights⁴⁵.

GNCHR would like to note that there is an urgent need for collaboration between the competent State authorities, the inspection authorities and the national social partners and other competent stakeholders to establish a suitable uniform and mandatory form for recording occupational accidents.

Regarding the protection against environmental and climate change risks (Art. 3 paras 1 and 3)

The 7th National Report does not mention that there is no explicit legislative provision on workers’ health and safety in the event of extreme weather events, which consistently affect society as a whole. Indicatively, there is a need to mention the expected dangerous rise in temperature during the summer. The Ministry of Labour is steadily issuing a non –binary circular. As GNCHR Plenary has been informed by its Member appointed by GSEE, the Confederation on its own initiative, gives the last 5 years wide publicity to its own information for the protection of workers, based on labour law principles, the already in force OSH legal framework and the scientific information from the competent

⁴⁵GNCHR 2009 Report on “Workers’ rights and working conditions in the context of contract works”. See [2009 Annual Report](#) p. 37.

authorities (i.e. the Hellenic National Meteorological Service, the Laboratory of Environmental Physiology of the University of Thessaly etc.)⁴⁶.

3. Article 4 – The right to a fair remuneration

The GNCHR, within the framework of its institutional role as the Greek NHRI and the execution of its mission as the central independent advisory body of the State on human rights' protection in law and practice, deals consistently and systematically with the gender equality dimension in all human rights. Labor rights, individual and collective, constitute a crucial field for the protection and promotion of gender equality in terms and conditions of work and equal remuneration, which, in addition to its constitutional recognition in Greece as a fundamental right and principle, is normatively protected at a high level in the national legal order by the provisions which integrate EU law (TFEU, Charter of Fundamental Rights, Directive 2006/54/EC, etc.) and implement ratified conventions (i.e. the rev. European Social Charter, ILO C100, C111 etc).

The 7th National Report does not include any adequate reference to the progress made by Greece in complying with the violations found in paragraphs 1, 2, 3 and 4 of Article 4 of the rev. ESC, which are all of important legal and practical importance. The GNCHR would like to remind the observations made in the 5th National Report and recommend being taken into consideration during the current examination by the ECSR, in combination with the observations made via its Report on the cost-of-living crisis. With respect to paragraph 2 of article 4, the observations over article 2 paragraph 1 are to be applied.

Article 4 para 3: the right of men and women workers to equal pay for work of equal value

Despite the guarantee of the equal pay principle by the Greek Constitution (art. 22 para. 1b) and the relevant regulatory sufficiency of the national legislative framework, Greece has not yet taken measures to remedy the violation of paragraph 3 of Article 4 of the rev. ESC, in terms of compliance with the obligation to ensure access to effective legal remedies and the obligation to recognize and respect in practice the principle of wage transparency.

The National Commission is of the opinion that the National Reports must clearly reflect the current framework at the time of their submission, especially when the information on legislation and its practical application has been officially and repeatedly requested by the ECSR to be updated. They cannot also include references to possible or upcoming legislative initiatives, which have not been completed at the time of their submission. As observed in the 7th National Report extensive reference is made to the incomplete

⁴⁶ Indicative GSEE's [Press Releases on workers' protection from extreme heat](#). See also, [Urgent Letter from the Greek General Confederation of Labour](#) (GSEE) to the Minister of Labour on the Critical Issue of Heat Stress Affecting Workers. [Addressing Workers' Occupational Heat Stress Caused by High Temperatures](#).

legislative process of incorporating Directive (EU) 2023/970 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.

The GNCHR reiterates its observations over the 5th National Report. More particularly, it still identifies certain gaps in the existing legislation and in its implementation in practice,⁴⁷ that limit women's labour rights, such as the persisting high female unemployment rate,⁴⁸ dismissals of pregnant women in the private sector in flagrant breach of the law, the absence of a minimum single maternity benefit to all working mothers and the continuous reduction of the already insufficient day-care structures for children and dependent persons. Moreover, the multiple State interventions to collective autonomy, especially as to the scope and mandatory character of both general and sectoral Collective Agreements setting uniform labour standards, resulted in the widening of the gender pay-gap⁴⁹. Additionally, there is still a failure to collect reliable statistics on gender discrimination in the workplace in Greece⁵⁰.

Confusion of State responsibility on gender equality

Regarding the issue of the limits of state competency for gender equality, the GNCHR takes this opportunity to recall not only the obligation, but also the need to maintain the gender equality portfolio and initiatives high among national priorities, taking into account the low ranking of Greece in the EU based on the Gender Equality Index of the European Institute for Gender Equality (EIGE)⁵¹. It is crucial to clearly define the central competence regarding the responsibility for gender equality policy, by ensuring the required institutional and operational coordination, which is inextricably linked to the monitoring of the implementation of the legislation through institutional social dialogue processes.

The 7th National Report makes extensive reference to the legislative process, which is ongoing, concerning the incorporation of EU Directive 2023/970 into national law. The process at hand falls under the responsibility of the Ministry of Labour and Social Security and has yet to be completed by the time of GNCHR's submission. Simultaneously, extensive reference is made to the actions promoting the practical implementation of EU Directive 2023/970 under the European FAIRPAY program, the implementation of which falls under the responsibility of the Ministry of Social Cohesion and Family, to which competence for gender equality has been transferred in 2023. Prior

⁴⁷ GNCHR, [Observations](#) on the 5th National Report on the implementation of the Revised European Social Charter (Reference Period 01/01/2017 - 31/12/2020), December 2022. Greek National Commission for Human Rights, Submission to the UN Human Rights Council's Universal Periodic Review of Greece, September 2015.

⁴⁸ Observatory of the General Secretariat for Gender Equality 19th e-bulletin - Female Unemployment, 1-04-2019

⁴⁹ Greek National Commission for Human Rights, Submission to the UN Human Rights Council's Universal Periodic Review of Greece, September 2015.

⁵⁰ [Observations by the GNCHR on the 5th National Report on the implementation of the Revised European Social Charter \(Reference Period 01/01/2017 - 31/12/2020\)](#), December 2022.

⁵¹ See [GNCHR Report on the situation of women in Greece](#), March 2024.

to this institutional change, responsibility for gender equality fell under the Ministry of Labour. The Ministry of Social Cohesion and Family is also responsible for awarding the companies with the “Equality Label” for their favorable practices over gender equality. For public sector workers, the Ministry responsible for their working conditions is the Ministry of Interior. The supervision of the implementation of gender equality as regards the terms of payment belongs to three independent authorities, namely the Labour Inspectorate, for private sector workers, and the National Transparency Authority, for public sector workers, and the Ombudsman, with parallel responsibility for both sectors. Within this perplexed setout of competencies and responsibilities, it should be noted that the competent tripartite administrative bodies of institutional social dialogue of the Ministry of Labour, such as the Equality Department of the Supreme Labour Council and the Social Control Council of the Labour Inspectorate and its local branches, have ceased to function. At the same time, the national social partners’ organisations as well as NGO’s on women rights have been excluded from their institutional participation in the National Council for Gender Equality, which operates under the Ministry of Social Cohesion and Family. The GNCHR welcomes the restoration of the functioning of the Division on Gender Equality of the Supreme Labour Council, which is included in the Bill on the incorporation of Directive (EU) 2023/970 (art. 2 and 14), pending for adoption by the Greek Parliament by the time of GNCHR submission.

Due to its institutional role, the GNCHR has asked the adoption of a legal provision that would allow for its participation with an “observer” status to both competent State Bodies, the National Council for Gender Equality, which functions under the Ministry of Social Cohesion and Family and the Division on Gender Equality of the Supreme Labour Council, which functions under the Ministry of Labour and Social Security, in order to provide its experience and institutional support to the State for the adequate intersectoral promotion of gender equality. The GNCHR expresses the hope that through the stable operation of these bodies, the necessary coordination will be achieved with co-competent Ministries and Authorities. To that direction the institutional participation of GNHCR is important and should be institutionalized through explicit legal provisions.

Observations and Direct Requests addressed to the Greek Government by the ILO CEACR

Taking into consideration that the equal pay for work of equal value, the forbidden discrimination at work, as well as the labour inspection and labour administration (as regards gender equality) are regulated by ILO Conventions ratified by Greece, the Greek National Commission has in many occasions mentioned the non-due implementation, which has been examined by the Committee of Experts on the Application of Conventions and Recommendations (CEACR). Illustratively, the GNCHR would like to underline:

- CEACR Direct Request ⁵² on the application of ILO C 150 (Law 1546/1985, GG A’94/22.5.1985) as regards the responsibility of the portfolio of gender equality at

⁵² [Report of the Committee of Experts on the Application of Conventions and Recommendations 2025](#), 18 February 2026.

[CEACR Direct Request 2025 on the application by Greece of ratified C150.](#)

work, which, among others, concludes that ***“The Committee requests the Government to provide its comments in this respect. It requests the Government to provide an organizational chart of the new Ministry of Social Cohesion and Family, as well as information on its responsibilities indicating whether some of them are relevant to labour administration. It requests the Government to provide information on how the two Ministries cooperate to ensure coordination of labour administration. The Committee requests the Government to provide information on the involvement of the social partners in this restructuring”.***

- CEACR Direct Request ⁵³ on the application of ILO C 100 (Law 46/1975, GG A'105/3.6.1975), through which the Committee in 2024 addresses rigorously to the Government on the serious issue of the lack of adequate statistical data and targeted informative and training actions for the representatives of the competent administrative and control authorities and Courts. In relation to the minimum wage, it is mentioned that ***«In light of the persistent gender pay gap and gender segregation of the labour market, the Committee asks the Government to provide information on the measures taken to ensure that minimum wage rates for white-collar and blue-collar workers are fixed based on objective criteria and do not contribute to the undervaluation of positions in which women are predominantly employed. It also asks the Government to provide information on: (i) the manner in which it is ensured that in defining minimum wages through collective agreements, rates are fixed on objective criteria, free from gender bias, and that female-dominated occupations are not undervalued in comparison with those predominantly undertaken by men; and (ii) the percentage of women and men who are employed as white-collar workers and blue-collar workers and who are paid the minimum wages».*** In relation to the collective labour agreements ***«Recalling the important role that can be played by collective agreements in the application of the principle of the Convention, the Committee asks the Government to provide information on: (i) any measures taken to strengthen collective bargaining coverage, in particular with a view to implementing the EU Directive 2022–2041 of 19 October 2022 on adequate minimum wages, which requires member states with collective bargaining coverage of less than 80 per cent to submit an action plan to promote collective bargaining; (ii) the manner in which the application of the Convention is promoted through collective agreements, including information on how provisions contained in collective agreements promote equal remuneration for men and women for work of equal value; and (iii) any activities implemented, in collaboration with the social partners, to promote the application of the principle of the Convention, and the results achieved».***

The GNCHR concurs that wage transparency measures are more effective when they are linked to collective bargaining, collective labour agreements and social

⁵³ [Report of the Committee of Experts](#) on the Application of Conventions and Recommendations 2025, 10 February 2025.

[CEACR Direct Request 2025](#) on the application by Greece of ratified C100.

dialogue, because transparency must lead to knowledge, evaluation and corrective measures, not just data. Social dialogue must not be a sterile declaration, but must be supported in practice as an essential factor for success in the implementation of Directive (EU) 2023/970, as well as the Directives with which it is inextricably linked, such as 2006/54/EC and (EU) 2022/2041, especially with regard to the objective of increasing to 80% the coverage of workers by collective labour agreements. **A crucial tool for the coordinated implementation of the Directives is the incorporation into the text of the collective labour agreements of the salary scales along with workers' professional qualification in their scope of coverage.** It must also be explicitly shielded through the stable (re)operation of the competent collective social dialogue bodies and the unhindered conclusion and extension of the binding force of the CLAs. Furthermore, **the NGCLA, to which the authority to determine** the minimum wage with universal force must be restored, can continue to perform its central role without hindrance in terms of the introduction of wage structures, with the recognized scientific assistance of **the Institutes of the national social partners in Greece.**

The National Commission for Human Rights, on the Draft Law for the incorporation of Directive 2006/54/EC⁵⁴, has pointed out that the legitimization of trade unions, legal entities and associations of persons to exercise the rights of victims of discrimination before Courts and administrative Authorities, as well as the burden of proof, are crucial issues for the effective legal protection of victims of discrimination at work. It is not unusual for those victims, due to their fear of reprisals, ignorance of their rights, lack of evidence or financial means, to avoid resorting to the competent Courts or other Authorities. The entire functioning and effectiveness of the legislation depends heavily on the proper formulation of the relevant procedural provisions and their inclusion in the legislation, so as to become more accessible, as well as to create the necessary legal certainty. However, the 7th national Report, in terms of ensuring access to effective legal remedies, does not mention the problems that remain in the Greek legal system: The requirement of “consent” of the affected person, provided for in the legislation, is essentially different from the term “approval, approbation”, which is also given ex post (relevant to the concepts of consent and approval are the articles 236-238 of the Civil Code). The prerequisite of “consent” does not correspond to the spirit and purpose of the provision of Article 15 of Directive 2005/54/EC, which is to achieve legal protection for individuals who could or would not resort to justice or an administrative Authority. Furthermore, it creates the risk that the relevant deadlines may lapse, thereby rendering the legal protection ineffective.

The critical role of Labour Inspection

The GNCHR observes that there is overlap and confusion regarding the allocation of competencies for addressing complaints and infringements relating to gender equality,

⁵⁴ Greek National Commission for Human Rights, [Comments on the Bill](#) “Implementation of the Principle of Equal Opportunities and Equal Treatment of Men and Women in Matters of Employment and Occupation- Harmonization of Legislation with Directive 2006/54/EC of the European Parliament and of the Council, 4 January 2008.

discrimination, violence, and harassment among three competent authorities: i) Labour Inspection, ii) Ombudsman, iii) National Transparency Authority.

Furthermore it should be observed that Labour Inspectorate: i) doesn't examine ex officio the dimension of discriminative practices when examining workers' complaints on violations of their labour rights, unless the workers explicitly invoke the provisions on anti-discrimination legislation and ii) separates according to the Labour Inspections internal competence, the examination of workers' complaints either to the Labour Relations' Inspectorate or to the Health and Safety Inspectorate, despite the fact that, for example, discrimination against pregnant workers or violence at work need to be jointly addressed. Furthermore, the situation is exacerbated by the fact that the aforementioned Labour Inspectorate offices do not cover the entire territory of Greece, a country with a large number of inhabited islands. In addition, the offices of the Ombudsman and the National Transparency Authority are centrally located in Athens, which may create practical barriers to access for individuals residing in remote and island regions.⁵⁵ Due to this barrier the NCHR requests from the Ministry of Labour to include a specific provision in the relevant legislation granting complainant workers the right to participate remotely in the examination of their complaints where no competent Labour Inspectorate office or Ombudsman office is located in the area of their workplace or, in the case of telework, their place of residence.

4. Article 5 - The right to organize

The 7th National Report, although critical as it concerns the pending assessment of Greece's progress in complying with the provision of Article 5 (introduced into the national regulatory framework after the ratification of the rev. ESC), does not clearly mention critical amendments of the national legal framework from 2020 onwards. The most characteristic example is the provisions that came into force in June 2021 under Law 4808/2021 to the detriment of critical aspects of workers' freedom of association, imposing restrictions on the establishment of trade unions with extensive state control, on the manner of operation and election of their representative bodies, on the exercise of basic collective rights by trade unions and their representatives. As a consequence, it is deemed more suitable to refer to all of the observations included in the 5th National Report on article 5 of the revised ESC (Annex I) and request that they are evaluated in their entirety by the ECSR when examining the country's obligations of due compliance.

The digital General Registry of Workers' Trade Unions (GEMHSOE)

GEMHSOE still functions under the basic provisions of Law 4808/2021 (art. 83-101), which amended important provisions of omnibus Law 1264/1982. The latter constitutes the fundamental national legislative act for trade unions' function (art. 1,2,3,5,8,13,14,15), despite the CEACR Direct Requests in 2021 and 2025⁵⁶, as well as the

⁵⁵ GNCHR, [Observations](#) on the bill of Law 5163/2024 (Government Gazette 199/06.12.2024) 04 December 2024.

⁵⁶ CEACR, [Direct Requests on the application by Greece](#) of ratified C87.

Council of State's (4th Chamber) Decision No 2175/2022, which found a series of violations in the content of the executive Ministerial Decision on GEMHSOE No 62599/26.8.2021. Also it recognized that the promotion of relevant legitimate and public interest objectives must not be pursued by legislative provisions resulting in infringing the core of the right of freedom of association or putting forward restrictions on such freedom, in breach of the principle of proportionality or unlawfully infringing other rights protected by the Greek Constitution, the European Convention, the ILO Convention 87 or by the European Union Law, such as the right to the protection of personal data.

The GNCHR has expressed its strong reservations⁵⁷ as to the obligation of registering trade unions to the General Workers' Trade Union Registry, because such requirement, as an obligatory prerequisite for the access to and the exercise of trade union rights, constitutes an interference, which is not sufficiently justified, especially taking into consideration the suspension of trade unions' and workers' representatives rights in case of non-registration.⁵⁸ In the light of the principles that i) the State owes, on the one hand, to secure via its legislation and on the other hand to abstain from acts infringing the right of workers and employers to freely organize their action and decisions and ii) any restrictions raised by the legislation in exercising human rights cannot possibly lead to an offense of the core of the limited right and to ultimately depriving the beneficiary from its exercise, the GNCHR states its strong concern about the provisions put forward for the General Workers' Trade Union Registry. Furthermore, the National Commission also notes that the provisions of Article 83 of Law 4808/2021 constitutes a state intervention in the process of establishing a trade union and of instituting the prerequisites for exercising the trade union action, jeopardizing the trade union's existence itself, because its registration in the General Workers' Trade Union Registry becomes a condition for its legal personality acquisition, substituting the operational independence guarantees of a Court. Moreover, the internal autonomy of trade unions and their action are at stake through said state intervention. By introducing state control in internal autonomy and action of trade unions, the core of trade union freedom is affected, because the exercise of the trade union action depends on its compliance with the preconditions of Article 83, whose nonadherence is controlled by the State. Therefore, said restrictions constitute state intervention in the establishment and functioning of a trade union, as a result, an issue of agreement results with the Article 23, par. 1, Greek Constitution and the country's obligations, as deriving from the

⁵⁷ There was a similar reservation as to the registry of NGOs based on the legislation of the Ministry of Migration and Asylum. There are pending cases before the Council of State and there is a need to underline the delay of the publication of the judgments. See e.g. ECRE, [Concerning the lawfulness of Greek legislation regulating the registration of non-governmental organisations \(NGOs\) on the Registry of NGOs working with refugees and migrants in Greece](#), December 2021 and RSA, [Rejection of registration in the NGO Register of the Ministry of Migration and Asylum despite the existence of all the prescribed conditions](#), 2021 (in Greek).

⁵⁸ GNCHR, [Observations on the 5th National Report on the implementation of the Revised European Social Charter \(Reference Period 01/01/2017 - 31/12/2020\)](#), December 2022.

international conventions that protect these rights (Article 28, par. 1, Greek Constitution).⁵⁹

Notwithstanding the amendments adopted by Law 5278/2026 (on the National Social Agreement for the promotion of collective agreements)⁶⁰, GEMHSOE still imposes compulsory trade union registration as a precondition for the exercise by trade unions of their right to recourse to Mediation for the conclusion of collective agreements and the right to apply for the extension of the signed collective agreement to which they are parties. On the contrary, the Digital General Registry for Employers' Organisations (GEMHOE), functions on a substantially voluntary basis. Moreover, employers' organisations continue to acquire their legal personality through the same judicial procedure. It should be highlighted that the majority of national employers' organisations that have a three-level structure have also expressed their objections to the legal framework on the functioning of their digital registry (GEMHOE) and have requested for a process of social dialogue.

Digital transition challenges in labour rights protection

With regard to the digital transition challenges in job protection and in the protection of the right to a reasonable daily and weekly working time for workers on digital platforms, the GNCHR has welcomed Article 67 of Law 4808/2021 introducing regulations regarding teleworking and the right to disconnect, as well as Articles 68-69 of the same Law concerning digital platforms. The same applies to the provisions of Articles 70-71 of Law 4808/2021, which provides, in principle, for trade union rights of service providers – natural persons and their health and safety, and Article 72 that provides for the obligation to inform service providers of their rights.⁶¹ However, it is of significant importance to underscore the flaws of articles 69-71 of Law 4808/2021 (art.132-134 Labour Code), which regulate the contractual relationship between digital platforms and service providers. More specifically, as it concerns those employees, the legislation introduces a negative presumption to the detriment of the existence of a dependent work (in which terms and conditions of employment can be examined by the Labour Inspectorate), since the service provider is entitled, under its contract, to use subcontractors or substitutes, to provide its independent services to any third party, to determine the time that the services are to be provided, etc. It is foreseen that only the

⁵⁹ GNCHR, Observations on Draft Law of the Ministry of Labor and Social Affairs On the Protection of Employment, Establishment of the Independent Authority Labor 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 careers", 14 June 2021, Summary of GNCHR Observations on Draft Law of Ministry of Labour and Social Affairs On the Protection of Employment, Establishment of the Independent Authority Labor 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 careers, 2021.

⁶⁰ GNCHR- Statement on Law 5278/2026 (ΦΕΚ 22 Α') of the Ministry of Labour and Social Security.

⁶¹ 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), December 2022.

signing of a standard contract with the above content will create a presumption at the expense of the dependent employment contract, even if the real conditions of employment, as is usually the case, will be completely different. The method depicted above dilutes the legal position of digital platform workers and creates difficulties regarding their position to submit evidence, since they will have to break the abovementioned presumption, in particular, where, according to the correct legal classification of their contract, the latter should be considered as a dependent employment contract. Taking into consideration the need of unhindered access to collective and individual labour rights, the access to labour law protection is hindered by the introduction of the negative presumption of non-existence of dependent employment relationship, which is the current legal basis of the enjoyment of individual and collective labour rights in Greece. It should be also noted, that after the wide publicity in national and international level of these provisions, the Government has not comply to its legal obligation to issue the foreseen Presidential Decree (art. 67 par. 12 Law 4808/2021) on the regulation of several conditions of telework, with further relevance also to platform work, despite the fact that important issues such as those concerning the determination of place and time of the teleworking scheme, the safeguarding of confidentiality and privacy, the means and range of Labor Inspectorate control are not foreseen to be included and regulated⁶². ILO CEACR through its 2021 Observation⁶³ on the implementation of C98 has asked to be informed on the practical application of platform workers' collective rights. In any case, Greece will be called upon to adapt its legislation appropriately when incorporating the Directive (EU) 2024/2831 on improving working conditions in platform work⁶⁴, which must be completed by 2 December 2026 (article 29). Further, the GNCHR welcomes the adoption in June 2026 of the International Labor Convention No. 193 on platforms⁶⁵ and declares its readiness to assist the State with a view to its ratification and the adoption of the appropriate implementation measures.

Digital transition to trade union internal procedures functioning

Digital transition of trade unions function has been accelerated during the pandemic crisis through legal provisions that extended the mandate of their governing bodies during the lockdown and allowed their collective procedures, such as the general assemblies, to be held remotely. The Greek National Commission for Human Rights has underlined the importance of facilitating this process by providing free or at least low-cost internet access to all trade unions throughout the country, accompanied with free

⁶² Greek National Commission's for Human Rights (GNCHR) [Observations on Draft Law of Ministry of Labour and Social Affairs "On the Protection of Employment – Establishment of the Independent Authority 'Labor 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"](#) full text in Greek. [Summary in english](#)

⁶³ [CEACR Observation 2021](#) on the application of ratified C98.

⁶⁴ [Directive \(EU\) 2024/2831 of the European Parliament and of the Council of 23 October 2024 on improving working conditions in platform work.](#)

⁶⁵ [Decent Work in the Platform Economy Convention, 2026 \(No. 193\).](#)

access to an adequate public platform for the electoral processes that safeguard the democratic rules and procedures of Law 1264/1982 along with measures to enable trade unions' access to the adequate infrastructure. The latter should be also accompanied by the development of a national training policy on digital collective and electoral processes. Despite the general importance of this process, which undoubtedly has a wider social impact on the general promotion of digital knowledge and processes, the national authorities, through Law 4808/2021 (art. 84- amending art. 3 of Law 1264/1982, art. 86-amending art. 8 of Law 1264/1982, art. 87-amending art. 13 of Law 1264/1982), have introduced legal provisions on the obligatory character of trade unions' collective procedures (general assemblies and elections), the provision by the State of a public electoral platform (with no further reference), as well as the ability of trade unions to choose a different (private) platform if it fulfills the guarantees of secrecy and fairness. As regards the provision of the public electoral platform ZEUS, the GNCHR recommends the creation of an experts' working group between the Ministry, the public company/provider of the platform (EDYTE) and the GSEE, in order to adapt ZEUS to the proportional representation and time protocols of trade unions' electoral processes, along with a guide, that could be easily understood by trade union members, both by nationals and non-nationals. . On the contrary, an explicit joint Ministerial Decision (Minister of State and Minister of Culture and Sports) has been issued on the electoral processes of sports' associations (MD72664/2021 GG' B 719/24-2-2021 on the "Procedure for General Assemblies by digital means and conducting electronic votes for decision-making and the election of the members of the statutory bodies of sports federations and associations).

The lack of State's due diligence on the digital transition of trade unions can be witnessed in other relevant areas as well. . Indicatively, under art. 84 of Law 4808/2021, which amended with direct effect art. 3 of central Law 1264/1982 ("trade unions' official books and records"), the official paper books of trade union (members' register, general assembly and governing body minutes' book, cash book, property book) are abolished and replaced by digital books (records). Three years after the introduction of this provision, during which the judicial services ceased validating trade unions' paper books, the Ministry of Labour and Social Security has not issued the foreseen in paragraph 4 Ministerial Decision, through which the form that the digital books will have, the date of commencement of implementation and every necessary detail for the implementation of this article should be determined. It should be mentioned that Greek Parliament's Scientific Service⁶⁶, has criticized the lack of due legal diligence on the above-mentioned provisions of Law 4808/2021.

Data on the practical application of art. 5 rev. ESC

In respect of Greek state's obligation to collect and provide comprehensive information on complaints of anti-union discrimination -an inquiry that is also submitted repeatedly by the CEACR- the GNCHR underlines the lack of a coordinated data system connecting the public authorities i.e. the Ministry of Labour and Social Security, the Labour Inspectorate and the Judiciary. Moreover, this data should be processed and assessed

⁶⁶ Greek Parliament's [Scientific Service Observations on the Bill of Law 4808/2021](#), p.40

along with other information, i.e. type of trade unionist's gender and post, grounds of anti-union discrimination, trade unionist's job profile etc. The lack of official data and assessment covers also the CEACR request submitted to the Government, via its 2021 Observations on C98, in order to reply to those arguments and provide information and statistics relating to complaints of anti-union discrimination and any remedial action taken, given also the fact that important part of these data falls now under the competency of the Labour Inspection, that has been detached from the Ministry of Labour.

It should be also added that a source of transparency and information was provided through the judicial archives, along with the workers' side direct knowledge to the structure of the special quasi-judicial "Committee on the Protection of Trade Union Officials" (art. 15 of Law 1264/1982). The so called "Article 15 Committee" had a first instance jurisdiction and structure, which consisted of i) the President of the First instance Judges of the district where the union member provides his/her job, ii) one employers' representative, appointed either from the merchants' or the industries' organizations and c) one workers' representative, appointed by GSEE. Its second instance (appeal) structure consists of i) the most senior President of the First instance Judges, ii) one employers' representative and iii) one workers' representative, appointed as referred before. For public sector, the structure of this Committee was replaced, as it concerns employers' side, by a representative appointed by the Minister of Interior and as it concerns workers' side, by ADEDY, the third level organization of public servants. The mandate of this Committee was to decide whether one of the strictly provided reasons (art. 14 para 10 of Law 1264/1982) for termination of union members' employment actually exists. Data on this process has ceased to exist, because under art.101 of Law 4808/2021, article 15, as well as the special reasons for protected trade union members' dismissal, have been abolished. It should be mentioned that Greek Parliament's Scientific Service, has criticized the abolition of these provisions of Law 1264/1982.

The above-mentioned critical elements ought to have been included in the 7th National Report on the implementation of Article 5 of the Revised European Social Charter, in order to ensure that the Report accurately and comprehensively reflects the actual state of affairs.

5. Article 6 - The right to bargain collectively

The GNCHR notes that the 7th National Report, while critical in terms of the pending assessment of Greece's progress in complying with the provision of article 6 introduced into the national regulatory framework with the ratification of the rev. ESC, does not clearly mention critical amendments to the national legal framework after 2020, such as those introduced by Laws 4808/2021 and 5053/2023, nor any data on their practical implementation. The impact of the further restrictions that came into force are added to the already serious cumulative impact of the multiple legislative interventions on the right to collective bargaining imposed by the terms of the country's international loan mechanism, during the period of the economic crisis.

The amendments to the legislative framework are not visible thus understandable in the text of the 7th National Report, as the reference is made to the regulations of the Labour Code (KED) and not to the basic laws that contain the crucial legislative provisions.

Art. 6 para.1: Joint consultations and Procedure of minimum wage setting

The 7th National Report cites as a first example of joint consultation the process that precedes the state regulation, by Ministerial Decision, of the minimum wage. In this regard, the GNCHR recalls the importance on both social and economic terms of the system of minimum wage and terms of work setting through the universally binding National General Collective Agreement as introduced in 1950⁶⁷ and implemented in Greece since 2019, after its critical amelioration in 1990 and the unanimous adoption by the Greek Parliament of Law 1876/1990. In 2013, during the economic crisis, the minimum wage setting competency has been given by law to the State, process that started to be implemented in 2019⁶⁸. The State led minimum wage process has been furtherly amended in 2024 by Law 5163/2024 (GG A' 199, art 6), with the adoption of certain criteria based on a coefficient/algorithm with fixed parameters⁶⁹, which will apply from 1.1.2028 for the annual adjustment of the statutory minimum wage and daily wage in both the private and the public sector, while for the years 2025, 2026 and 2027, art. 15 of this Law preserves the mechanism of the State's determination of the statutory minimum wage and daily wage through Ministerial Decision of the Minister of Labour, after consultation with the national social partners and the approval of the Council of Ministers. GNCHR would like to express the hope that the State will take advantage of the effectiveness of social partners' contribution to the consultation process on the minimum wage, as a key element of good governance and meaningful social dialogue.

⁶⁷ Law 3239/1955/GG A' 125.

⁶⁸ According to article 103 of Law 4172/2013, the Minister of Labour is given legislative authorization to issue a Ministerial Decision determining the minimum wage, after consultation with the national social partners (GSEE, SEV, GSEVEE, ESEE, SETE, SBE) and the approval of the Government's Council of Ministers. The procedure of this system, which provides for the preparation of reports by specific research bodies and the analysis of available data from various sources (such as ELSTAT, ERGANI, Eurostat, OECD), was coordinated by the President of OMED and facilitated by its services.

⁶⁹ The new system of automatic determination of minimum wage will result, after consultation, from the sum of a) the annual rate of change of the consumer price index between 1 July of the previous year and 30 June of the current year for the lowest twenty percent (20%) of the income distribution of households and b) half of the annual rate of change of the purchasing power of the general wage index during the same period. The purchasing power of the general wage index constitutes a new criterion for Greek legislation. If the above coefficient leads to a reduction in the statutory minimum wage, no adjustment is made, in accordance, in fact, with the requirements of article 5 par. 3 of Directive 2022/2041 which sets as a condition that the application of the automatic indexation mechanism "does not lead to a reduction in the legal minimum wage".

Art. 6 para 2: Collective bargaining

Without questioning the value of reporting and the prospect of implementing the National Social Agreement signed after collective bargaining in November 2025 and incorporated into legislation in February 2026 to strengthen collective bargaining, both the 5th and the 7th national reports avoid presenting the evolution of the implementation of the collective bargaining framework and the impact that the successive and cumulative restrictive measures have had on this fundamental right.

Current characteristics of the collective bargaining system in Greece

One of the main characteristics of the collective bargaining system in Greece in the reference period of the current reporting cycle, is the individualization of labour regulations through State's determination of minimum wage along with the decentralization of collective bargaining to the enterprise level⁷⁰, through the deterioration of the collective agreements coverage. Since 2010, the successive legislative measures⁷¹ which have remained in force in the period 2020-2025 have led to

- i) the steady erosion with specific combined measures of the sectoral and professional level of collective bargaining, such as the suspension of indefinite duration of the favourability principle in favour of the enterprise level agreements and the process of extending the binding force of collective agreements, the limitation of the extension period that collective agreements are binding after their expiration from 6 to 3 months along with the limitation of the extended provisions only to the basic wage and 4 allowances, the unilateral regulation of working conditions, the tightening of the mediation process and the obstacles to the access to arbitration, the extensive obligatory criteria that should be referred in the mediation proposal and the arbitration decision⁷².
- ii) the State's control to the collective rights' system as a whole, which, additionally to the above mentioned measures and their impact, has been deepened through the introduction by law (Laws 4635/2019 and 4808/2021) of the two public registries, GEMHOE for the employers' organisations and GEMHSOE for trade unions, with the added restriction for the latest, to subject their legal existence and the exercise by them of all their fundamental collective rights from their

⁷⁰ [Important data](#) on the number and types of CLAs that have been signed to date and the extremely small number of Arbitration Awards can be found, in addition to its annual reports, in the Study published in 2025 by OMED, entitled "Collective Negotiations in Greece in the Years 2013-2023" Malagardi A., Stampoulis M., 2025, Sakkoulas Publications. The study focuses on the development of collective bargaining in Greece during the eleven-year period 2013-2023, within and outside of OMED. In particular, it aims to evaluate the practical implications of the changes that took place during the period 2013-2023 through the description, analysis and assessment of developments in collective bargaining and to detect the trends and prospects of the Greek collective bargaining system both in the new national landscape and in the European one, under the light of the EU Directive (2022/2041) on adequate minimum wages.

⁷¹ An indicative presentation of the adopted legislation includes L.3845/2010, L. 3863/2010, L. 3871/2010, L. 3899/2010, L. 4024/2011, L.4046/2012 and Ministerial Council Act 6/2012, L. N. 4093/2012, L. 4303/2014, L. 4472/2017, L.4475/2017, L. 4549/2018, L. 4635/2019, L. 4808/2021, L. 5303/2023.

⁷² GSEE Observations of the years 2019-2023

- registration to it. On the contrary, employers have no implication in law and in practice, in case they are not registered in their respective registry.
- iii) The State's controlled system has been standardized in the basic provisions of individual labour law and the minimum wage process has been excluded from the collective labour legislation. As mentioned before, the legislative system on the State-led formulation of minimum wage has been standardized with permanent provisions included in the Code of Individual Labour Law (PD 80/2022), as amended with the uniform Labour Code published in July 2025 (PD 62/2025, GG A' 121).

Deterioration in collective bargaining coverage

According to the Greek Organisation for Mediation and Arbitration (OMED) annual action reports⁷³, which contain important information on the evolution of CLAs and Arbitral Awards, and its specific studies under the title "Collective bargaining in Greece: Trends, Milestones and Prospects" for the years 2012-2013⁷⁴ and 2013-2023⁷⁵, the following data and conclusions are included:

- During the period 1990-2010, in addition to the NGCA, approximately 100 sectoral, 90 professional and 150 enterprise level CLAs were concluded annually. The number of sectoral CLAs was stable and this type of CLAs was at the center of the structure of the collective bargaining system, formulating its core. The number of professional CLAs was also stable and the number of enterprise level CLAs was characterized by a slight upward trend between 1990-1999 and 2000-2008. Before the crisis, worker coverage CLAs was nearly 100%, due to the conclusion and the universal binding force of NGCA⁷⁶.
- After the recourse to the international loan mechanism in 2010 and the imposition of its conditionalities, the erosion of NGCA's ability to set minimum terms of payment and of its universally binding nature has negatively impacted wages and working conditions across Greece and impeding the conclusion of CLAs of the other types. Especially during the years 2013-2017, changes in the structure of collective bargaining are evident as a result of the above-mentioned restrictive legislative interventions. The comparative figures of the number of collective agreements by type for the years 2013-2017 confirm the change in the structure of collective bargaining in Greece, with the main feature being the rapid decentralization of collective bargaining to the enterprise level and the parallel decline in the degree of CLAs coverage of the labor market to percentages of 42.3% for the year 2013, 15% for the year 2014, 16.7% for the year 2015, 17.8% for the year 2016, 18.7% for the year 2017 and 25.8% for the year 2018, percentages which have been the lowest in the EU countries.

⁷³ OMED Annual Reports (in greek)

⁷⁴ C. Ioannou, K. Papadimitriou (2013) "Collective bargaining in Greece in the years 2011-2012. Trends, Milestones and Prospects" OMED

⁷⁵ A. Malagardi, M. Staboulis (2025) "Collective bargaining in Greece in the years 2013-2023. Trends, Milestones and Prospects" OMED, Sakkoulas

⁷⁶ OECD, [Collective bargaining coverage](#)

- Available data confirm that there is an absence and almost complete disappearance of national Sectoral CLAs in large sectors of the Greek economy, mainly from 2010 and 2011 onwards, such as, for example, the sector of commercial enterprises which covers 16.5% of total employment for 2023. Also, the sectors of agricultural cooperative organizations, geotechnical, fur workers, leather goods, law firms, publishing houses, tobacco workers, ceramics, textiles, KTEL, Quarries, Distillery, service provision, plastics, radio, iron and steel, television stations, printers, packaged foods, pharmaceutical companies, papermaking, chemical industry, newspapers, etc.
- Regarding the national professional CLAs, there has been a disappearance and absence to this type of CLA, mainly since 2011 and onwards, in professions such as agronomists, free theater actors, foremen, teachers at vocational training institutes, textile workers, tour guides, permanent construction workers, oil and liquid fuel tanker drivers, industrial chemical engineers, mine and lignite mine operators, industrial enterprise operators, physiotherapists in private laboratories, etc.
- Compared to other European countries, according to data from the European Central Bank⁷⁷, the coverage by collective bargaining, as updated in 2023, reaches 15-20%.

The coverage of workers by collective agreements has plummeted. Greece has one of the worst rates of collective bargaining coverage⁷⁸ (around 20%), which is almost 60 percentage points away from the target of 80% set by the Directive 2022/2401 for all Member States. Compared to other European countries in terms of collective bargaining coverage, Greece stands in the penultimate position as reported for the year 2023⁷⁹.

The quantitative evolution of CLAs since 1992, along with the percentage of arbitration decisions, can be overviewed from the following Table, issued by the Organisation for Mediation and Arbitration (OMED)⁸⁰. OMED, as known, is the independent body governed equally by the national social partners (GSEE-workers' side, SEV, GSEVEE, ESEE, SETE, SVE-employers' side), that has the competency to provide mediation and arbitration services, as well as conciliation services, after the transfer in 2021 (art. 98 of Law 4808/2021, amending art.13 of Law 1876/1990) of this competency from the Ministry of Labour and the Labour Inspection to OMED.

- In 2024⁸¹, only 18 sectoral and professional CLAs (both national and local) were signed and deposited with the Ministry of Labor and Social Security, consisting of 9 national and 9 local CLAs. Additionally, 238 enterprise-level CLAs were signed

⁷⁷ European Central Bank (2024), Gornicka Lucyna, Koester Gerrit, [A forward – looking tracker of negotiated wages in the euro area](#), Occasional Paper Series, No 338.

⁷⁸ European Central Bank, Gornicka Lucyna, Koester Gerrit, [A forward – looking tracker of negotiated wages in the euro area](#), Occasional Paper Series, No 338.

⁷⁹ OECD (2023), [Collective bargaining coverage](#), A detailed methodological note.

⁸⁰ OMED 2025, [Report delivered](#) for the minimum wage setting process in 2025.

⁸¹ INE GSEE, 2025, [Annual Report](#) on the Greek Economy and Employment, p. 104.

in the same year. A new NGCA has been also concluded for the years 2024-2025, with an explicit standstill clause to maintain in force all its previous agreed terms (except minimum wage) and a special agreement on the terms of bipartite governance of the account's resources, consisting of the workers' and employers' contributions mainly for vocational training. Moreover, in 2024, four professional CLAs are in force, covering all maritime workers who are regulated under a special regime and are deposited and certified by the Minister of Maritime.

- The 47 sectoral and professional CLAs currently in force are estimated, according to trade unions' data and the number of salaried workers in the private sector declared to the ERGANI System, to theoretically cover about 711.500 workers, approximately 28% of all salaried workers (2.519.726)⁸². However, the actual coverage is likely much lower, as only 7 of these CLAs have been extended and declared universally binding, covering sectors such as hotels, tourist shops, private insurance, and maritime professions, covering approximately 502.630 workers employees (20% of all salaried employees). The remaining CLAs are only binding on the members of the contracting parties (employers and workers). This limitation is exacerbated by common practices among enterprises, such as claiming non-membership in employers' organizations to avoid CLA application or misclassifying workers to bypass the relevant CLA. The Ministry of Labour is obligated to provide the ILO with detailed information on how many CLA extension applications were made, the sectors and professions they covered, and the reasons these were not processed by the Supreme Labour Council's Plenary. One example that verifies the lack of procedural transparency is the non extension of the national professional CLA of hotel electricians, despite the fact that the Ministry of Labour has used the relevant data for the extension of the national sectoral CLA of the touristic sector, fact that has been publicly criticized by the GSEE and the competent Federation of Electricians⁸³.
- Regarding the coverage of employees by enterprise CLAs, based on the monthly reports of the "ERGANI" System for the year 2024, the 238 submitted CLAs potentially cover 168.161 employees, showing an increase compared to 2023, in which 209 new enterprise CLAs were signed, potentially covering 137.171 employees. The vast majority of the 2024 company-wide collective bargaining agreements, namely 156 company-wide agreements (66%), which potentially cover 110.747 salaried employees, keep salaries unchanged and the remaining 82 company-wide agreements (34%) provide for salary increases and concern 57.414 employees.
- Beyond the number of CLAs per year and by type of agreement, what is noteworthy and important is the fact that from 2021 onwards, CLAs in the field of sectoral and similar professions become practically non-existent, as a result of the application of Law 4635/2019 and its restrictive provisions on unilateral recourse only in sectors or professions where the resolution of the collective

⁸² Information System ERGANI, Annual Special Issue 2024

⁸³ GSEE [Press Release](#) on the non-declaration of the national professional CLA of hotel electricians (includes the competent Federation of Electrician Press Release) 28 January 2025.

dispute is required by an existing reason of general social or public interest related to the functioning of the Greek economy. In other words, collective bargaining, when occurred, in sectoral or similar professions from 2021 onwards has been completed with the conclusion of CLA.

- As referred in CEACR 2021 Observations on C98, regarding the current national legislation on the restricted recourse to arbitration, the Hellenic Federation of Enterprises (SEV) “acknowledges that this change in the application of the Convention was intended to align the current legal framework concerning compulsory arbitration with the decisions of the ILO”. All the above available and presented data confirm that the access to arbitration, after its abolishment, was re-instated, but with severe restrictions, that eliminate its use. There is a need to note the Council of State’s Plenary landmark Decision 2307/2012. The Supreme Court ruled that the legislative provisions, which allow requests for arbitration only if both parties consent, is incompatible with article 22, par. 2 of the Greek Constitution, the letter and spirit of which require the legislature to establish an arbitration system as subsidiary mechanism for resolving collective labour disputes in case of failure of collective bargaining. The activation of this process does not require the consent of both parties of the collective dispute, but, by virtue of the same constitutional provision, the consent of at least one party is sufficient. Thus, the arbitration system, as it was regulated by the initial provisions of Law 1876/1990, has the status of “a last resort and a subsidiary means of dispute resolution”, which has been further proved in practice, during the last years, as confirmed by the above-mentioned data. SEV wants the total abolishment of this crucial procedure, that creates disincentives for the parties to react in bad faith during the negotiations and the mediation, the result of which they must accept in order to have recourse to the arbitration.

The National Social Agreement for the strengthening of collective agreements

Following the conclusion and signing, in November 2025, of the National Social Agreement for the Strengthening of Collective Labour Agreements, as a measure of implementation of the Directive (EU) 2022/2041, the Ministerial Decision including the relevant Action Plan was issued in December 2025, followed by the enactment of Law 5278/2026, which incorporated the Agreement into national legislation.

The National Social Agreement and the relevant Action Plan establish a structured framework for the strengthening of collective bargaining and social dialogue. According to the main provisions of the Agreement:

- Under the new framework, a sectoral or professional CLA may be declared as generally binding for the entire sector or profession, provided that it already binds employers who employ more than 40% of the workers in the sector or profession (instead of the 50% required until now), following a request submitted by any of the parties bound by the CLA to the Minister of Labor.

- A sectoral CLA may be extended without assessment if the 40% threshold is met, if it is co-signed by the GSEE and the most representative or national employers' organization in the relevant sector.
- The full after-effect of the terms of the CLA after its expiration is restored, while the extension of the binding force of a CLA after its expiry remains at the 3-month period (the extension period of the NGCLA remains at the 6-month period). Workers hired during the three-month de lege extension of the expired CLA are also covered by it.
- The law simplifies the information required for registration in the General Register of Workers' Trade Unions (G.E.M.I.S.O.E.) and the General Register of Employers' Organizations (G.E.M.I.O.E.). If a trade union is not registered in G.E.M.I.S.O.E., its right to resort to the Organisation for Mediation and Arbitration (OMED) for the provision of Mediation and Arbitration services cannot be exercised, as well as its right to submit an application for extension of the binding force of the CLA.
- Regarding the recourse to OMED for the provision of Mediation and Arbitration services, the Law establishes the functioning of the Committee on the Admissibility within OMED with the competence to examine the admissibility of unilateral Mediation and Arbitration applications and to issue a decision within 15 working days after submission. The decision can be appealed in Court within 10 days after it is served. In addition, the Law abolishes the Second-Instance Arbitration Committee of the OMED, while arbitration decisions can be directly appealed in court within 10 days of notification.

Art. 6 para. 4 – Collective action - Further restrictions on the right to strike

Law 4808/2021 (art.91 and 93, art. 420 Labour Code) introduced new restrictions to the right to strike, i.e. the obligation of trade unions to deliver the written (already provided by law 1264/1982) notice of the declared strike by bailiff, with additional expenses, that includes a detailed description and justification of the strike (day and time of strike, when the strike starts and ends, the form of the strike, its reasons in detail) and the civil liability of trade union and its members in personal, in case of not protecting the right to work of those workers that don't participate to the strike. The introduction of vague concepts, such as psychological violence, poses great risks to the exercise of the right to strike, being in danger of becoming inactive.

In addition to these restrictions, art. 31 of Law 5053/2023 added a 4th paragraph to art.93 of Law 4808/2021, through which a specific criminal offence is introduced also on the added criminal liability of the trade union representatives and/or members. This provision had created strong reactions, even from members of the Judiciary⁸⁴. It is evident that all these prohibitions, combined with other anti-union provisions (like the creation of trade unions and the exercise of their rights only after the registration to the

⁸⁴ Sevastidis Ch (2023), "The criminalization of labor struggles in the harshest form" <https://antimolia.gr/christoforos-sevastidis-i-poinikopoiisi-ton-ergatikon-agonon-stin-pio-skliri-morfi/>

State controlled public registry GEMHSOE), do not only hinder the legitimate exercise of the right to strike, but lead to its collapse in breach also of article 23, par. 2 of the Greek Constitution that explicitly protects the right to strike. The Greek National Commission for Human Rights⁸⁵, as well as the Greek Parliament's Scientific Service⁸⁶ have strongly criticized both the above-mentioned provisions.

⁸⁵GNCHR [Observations on the Bill of Law 4808/2021](#) [summary in English]. See also, GNCHR, [Observations on the Bill of Law 5053/2023](#), 2023.

⁸⁶ Greek Parliament's Scientific Service [Observations on the Bill of Law 4808/2021](#). See also, Law [5053/2023](#).

6. Article 20 - The right to equal opportunities and equal treatment in matters of employment and occupation without discrimination on the grounds of sex

The 7th National Report does not report on the progress in Greece's compliance to restore the violation of Article 20 of the rev. ESC⁸⁷. Apart from the observations added in art. 4, the GNCHR considers it important to refer to characteristic examples, among others, of previous and new measures bearing upon labour standards and workers' rights and their impact on gender equality and illegal discrimination at work that are legislated without any recourse to social dialogue with the social partners. Illustratively:

6.1 Institutional social dialogue and social participation in achieving gender equality in employment and labour rights

National Action Plans on Gender Equality (current 2021-2025), especially as it concerns their actions for the promotion of gender equality at work, are adopted and monitored without proper social dialogue. Given the importance of these National Action Plans, the GNCHR reiterates the need for the restoration of institutional social dialogue on gender equality. Moreover, a significant part of Greece's employment anti-discrimination policy relies almost entirely on European funding programmes. The GNCHR therefore underscores the need for a coherent and sustainable governance framework on gender equality and non-discrimination, ensuring the continuous provision, monitoring and adequate state funding of public policies and services in these areas. To this end, the meaningful involvement of the national social partners should be restored.

The need for greater policy coherence is further illustrated by the fact that measures concerning gender equality and protection against discrimination, racism, intolerance, violence and harassment in the workplace are currently dispersed across various interministerial action plans, often without sufficient coordination, interaction or strategic coherence. These include, inter alia:

i) the Action Plan on Gender Equality 2021-2025⁸⁸, ii) the Action Plan against Racism and Intolerance⁸⁹, iii) the Action Plan for Persons with disabilities⁹⁰, iv) Action Plan on Migration and Asylum⁹¹ v) the National Strategy and Action Plan for Roma Social Inclusion 2021 – 2030, vi) the LGBTQI+ Equality Strategy (2020-2025)⁹², vii) the National Action Plan on Women, Peace, Security⁹³ etc.

⁸⁷ Complaint No. 131/2016, University Women of Europe (UWE) v. Greece, ECSR Follow up Report, March 2024

⁸⁸ [National Action Plan for Gender Equality 2021-2025](#).

⁸⁹ [NATIONAL ACTION PLAN AGAINST RACISM AND INTOLERANCE 2020-2023](#).

⁹⁰ National Action Plan for people with disabilities

⁹¹ [Annual Action Plans 2021](#). See also, [Greek Policy for Social Integration](#).

⁹² [National Strategy for LGBTQI+ Rights](#).

⁹³ In implementation of UN Security Council Resolution 1325/2000

Other important measures aimed at promoting gender equality in the workplace, such as the gender equality labelling of enterprises⁹⁴ and the establishment of “childcare units within large companies”,⁹⁵ were adopted despite significant concerns raised by civil society regarding the eligibility criteria for participating enterprises. These concerns included, inter alia, the absence of mandatory minimum health and safety standards to ensure the protection of children. It should be mentioned that there is no legal provision, thus legal transparency, on how and under what conditions equality labels are attributed to enterprises. These measures also form part of the implementation of Law 4604/2019 (Government Gazette A' 50) on substantive gender equality, Concerning this important legislative initiative (Law 4604/2019), before the adoption of which the GNCHR has highlighted the importance of a timely and adequate social dialogue with the social partners and civil society organisations⁹⁶.

The need for promoting gender equality and non-discrimination at work through a coherent and accessible legal framework

Due to the lack of institutional dialogue process (also) on the implementation measures of C190, the GNCHR has underscored to Ministry of Labour and Social Affairs the State's obligation to ensure the coherence of the legal framework on gender equality, discrimination, violence and harassment at work. The Commission noted on the already in force (before the draft Bill of Law 4808/2021) legislative framework⁹⁷ and the obligation not to introduce legal provisions that create rights, obligations and process before the competent Authorities that are contradictory, incoherent and create confuse for workers who are victims of inequalities, violence and harassment at work. Legal uncertainty has been also created with respect to the vital right for access to competent Authorities of victims of inequalities, violence and harassment at work due to the transform of the Labour Inspection to independent authority (art 102 of Law

⁹⁴ Art 21 Law 4604/2019 (GG A' 50), as amended by art. 21 Law 4808/2021 (GG A' 101).

⁹⁵ By virtue of L. 1483/ 1984 (art 12 para 1), the national framework provided for the enterprises with more than 300 workers to provide for sufficient and suitable space for the accommodation of a “crèche”, after the opinion on suitability of the Ministry of Health and the conclusion of enterprise collective agreement on the relevant provisions. Given, as mentioned in our Observations, that no institutional tripartite dialogue has been made (also) on this issue, this provision has not been used in favour of workers in an adequate manner (See National Report p. 48).

⁹⁶ GNCHR, [Status of Women in Greece](#) (2025 updated).

⁹⁷ C190 implementation measures that are included in Law 4808/2021 were adopted without due diligence to the already existing framework in force through Law 4531/2018 (GG A' 62, on the ratification of the Council of Europe Convention on preventing and combating violence against women and domestic violence in general (the Istanbul Convention), Law 4604/2019 (GG A' 50 on Substantive Gender Equality, Preventing and Combating Gender-Based Violence), Law 4443/2016 (GG A' 232)among others, on the transposition into Greek legislation the Directive 2000/43/EC implementing the principle of equal treatment between persons irrespective of racial or ethnic origin, the Directive 2000/78/EC establishing a general framework for equal treatment in employment and occupation), Law 3896/2010 (GG A' 207 concerning the application of the principle of equal opportunity and treatment of men and women in terms of employment - transposition of Directive 2006/54/EC). See also GNCHR, [Observations on the draft bill of Law 4808/2021](#), 2021.

4808/2021) and the revealing, due to the incoherent framework, of procedural difficulties, such as the competency now of three (3) independent authorities (Labour Inspection, Ombudsman, National Transparency Authority) on control procedure and the procedural requirements. Public sector workers have also to face this incoherency, as well as the legislative gaps or deficiencies related to the competent Bodies regarding protection against discriminatory or abusive practices.

Also, as mentioned above, Labour Inspectorate i) doesn't examine ex officio the dimension of discriminative practices when examining workers' complaints for example on dismissal or pay reduction or change in working arrangements, unless the workers explicitly invoke in written and explicitly the provisions on anti-discrimination legislation, even though the discriminatory bases is evident, ii) separates according to the Labour Inspections internal competency, the examination of workers' complaints either to the Labour Relations' Inspectorate or to the Health and Safety Inspectorate, despite the fact that for example discrimination against pregnant workers or violence at work need to be jointly addressed and iii) examines complaints on violence and harassment cases only when they are submitted in Greek (art. 3 of Ministerial Decision 101269/2022/ GG B' 5978 on Law's 4808/2021 - ILO C190 implementation measures process before the Labour Inspection). If complaints are not written in Greek and don't refer explicitly to the legislation in breach, then they are declared as inadmissible, thus imposing further restrictions against non-nationals or illiterate worker-victims, despite their known vulnerability. This obligation is not imposed by law as it concerns the process before the Ombudsman, according to Laws 3896/2010 and 4443/2016. It should be also mentioned that the situation is more aggravated by the fact that not all Greece (an importantly islandic country) is covered by services of Labour Inspectorates, while Ombudsman's offices are based in the capital – Athens, as well as the ones of the National Transparency Authority. To that direction, GNCHR welcomes the provision included in the Bill on the incorporation of Directive (EU) 2023/970, pending in the Greek Parliament during the Commission's submission, that, if in the area where the worker lives or works, there is no office for the provision of the competent services of the Labour Inspectorate, then the process can take place remotely for all the participants (art. 34). Furthermore, the GNCHR expresses the hope that this provision will be followed by the adequate administrative measures, so as to be effective in practice.

Lack of coherent statistical data

The GNCHR expresses the sincere hope and is willing to contribute to the creation of a mechanism of collecting coherently data with reliable and comprehensive statistics from all the (co)competent State authorities, the Labour Inspection and the National Transparency Authority, as competent inspection Authorities for the public and the private sector, the Ombudsman as the Equality Body .

This mechanism will hopefully respond to the challenges emerged due to the consecutive transfer of gender equality administrative and political competencies and state Bodies (like the General Secretariat for Gender Equality) from the Ministry of Interior to the Ministry of Labour and Social Affairs and since 2023 to the Ministry of Social Cohesion and Family. It should be also mentioned that the portfolio on gender equality has lost its autonomy, has been downgraded under the portfolio of “family” and has been merged with the portfolio of human rights under the competency of the General Secretariat for Equality. This political and administrative deficit and its impact on the data collection system results in the failure to collect reliable statistics on discrimination in the workplace on the basis of gender and other grounds of discrimination⁹⁸.

The lack of statistical data on the enjoyment also of the ICERD rights has been a concern of CERD and its relevant recommendations in 2024, according to which “this lack limits the Committee’s ability to properly assess the situation of such groups, including their socioeconomic status and any progress achieved by implementing targeted policies and programmes”⁹⁹. There was a similar discussion during the meeting of the GNCHR with the delegation of the European Commission against Racism and Intolerance (ECRI) of the Council of Europe, which was held in the context of the 4th evaluation of Greece¹⁰⁰. During the meeting, which took place on 21 April 2026, key challenges in the field of combating racism and discrimination in Greece were discussed. Particular emphasis was placed on hate crimes, hate speech and the protection of vulnerable populations.

Gender equality in practice “lags behind”, as noted also by the UN WG on discrimination against women and girls in its visit in Greece in April 2019. The lack of available and reliable data and strong monitoring capacity is also a key challenge for Greece that impedes progress¹⁰¹. According to EIGE data women’s empowerment in Greece both in the public and private sector remains disappointing¹⁰².

⁹⁸ For instance, with respect to the take up of parental leaves the annual Report for Greece on leavenetwork.org, shows that almost every year there is a steady reference on “There is no information on the uptake of the various types of leave. Statistics provided by the Labour Inspectors’ Authority on private sector employees record people on leave by sex; however, there is no information about how many employees are eligible, but do not make use of their entitlement. Furthermore, these statistics are collected under the equal treatment legislation and do not provide any data on the uptake of leaves that apply exclusively to mothers” [Country Report](#) of 2021. See also, [Annual Reviews](#).

⁹⁹ CERD, [Concluding observations](#) on the combined twenty-third and twenty-fourth periodic reports of Greece, December 24, 2024 CERD/C/GRC/CO/23-24.

GNCHR [Written Contribution](#) for the List of Themes prior to Greece’s review of its combined 23rd and 24rd periodic report by the Committee on the Elimination of Racial Discrimination (CERD) in its 114th Session, September 16, 2024.

¹⁰⁰ GNCHR, [Meeting of the GNCHR with an ECRI delegation](#), 21 April 2026.

¹⁰¹ UN Human Rights Council, Visit to Greece: Report of the Working Group on discrimination against women and girls, A/HRC/44/51/Add.1, April 2019. The WG experts are concerned that there is uneven coordination of support services for victims of the various forms of gender-based violence, as well as programmes for perpetrators

¹⁰² See [Gender Equality Index](#)- Country Report: Greece.

It is here worth mentioning, that ILO CEACR in its Direct Request on the application of C100, refers explicitly to the UN Working Group on Discrimination Against Women in Law and in Practice noting that in April 2019 *“(it) highlighted the need for women’s equal access to the labour market and improved pay and conditions at work, and expressed specific concern at the persistence of the gender pay gap and the absence of women in leadership roles (OHCHR, Press statement of 12 April 2019). In light of the persistent gender pay gap and occupational gender segregation of the labour market, the Committee asks the Government to provide information on: (i) the application of Law No. 4706/2020 and its impact on the presence of women on Boards of Directors; and (ii) any other measures taken, including in collaboration with employers’ and workers’ organizations, to raise awareness, make assessments, and promote and enforce the application of the Convention. It asks the Government to provide information on the proactive measures implemented, including in the framework of the National Action Plan for Gender Equality for 2016–20 and for 2021–2025, to address the gender pay gap by identifying and addressing its underlying causes, such as vertical and horizontal occupational gender segregation and stereotypes regarding women’s professional aspirations, preferences and capabilities, and their role in the family, and by promoting women’s access to a wider range of jobs with career prospects and higher pay. Recalling that regularly collecting, analysing and disseminating information is important for addressing appropriately unequal pay, determining if measures taken are having a positive impact on the actual situation and the underlying causes of the gender pay gap, the Committee requests the Government to take all necessary measures to provide updated statistical information on the gender pay gaps, both in the public and private sectors*, while (the CEACR) invites one more time the Greek Government, to collaborated with employers’ and workers’ organizations, the Ombudsperson and the enforcement authorities¹⁰³. This has not happened until now. Furthermore, in addition to its Direct Request to the Government, CEACR in its Observations of 2024 on ratified C100, *“notes that, in its 2024 concluding observations, the United Nations (UN) Committee on the Elimination of Discrimination against Women (CEDAW) also expressed concern about: (1) the persistent gender pay gap; (2) the concentration of women in lower-paid jobs and in the informal economy, where they are exposed to exploitation and have no access to social security systems; and (3) the large number of women engaged in unpaid care work (CEDAW/C/GRC/CO/8-9, 20 February 2024, paragraph 33). In light of the significant gender pay gap, the Committee wishes to stress that it is important to deal with the persistent underlying causes of pay inequality that still need to be addressed in the country. A comprehensive approach to the reduction and elimination of pay disparity between men and women involving societal, political, cultural and labour market*

¹⁰³ CEACR [Direct Requests](#) of 2024 and 2020 on the application of C100.

interventions is required. In that regard, the Committee observes that the 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 women and men through pay transparency and enforcement mechanisms (EU Pay Transparency Directive) entered into force on 6 June 2023, and that EU Member States must implement it within three years”.

GNCHR observes¹⁰⁴ that the lack of available and reliable data and of strong monitoring capacity is key challenge that impedes progress¹⁰⁵, while notes the need to enhance the capacity of the Hellenic Statistical Authority in order to play an important role, in synergy with all the involved stakeholders, towards the development of national statistics under a human rights-based approach. The GNCHR has repeatedly expressed its serious concerns at the general lack of available and updated data and statistics on various areas of human rights protection, disaggregated by sex, age, race, ethnicity, geographical location and socioeconomic background, which are necessary for the systematic monitoring and evaluation of progress towards the realisation of human rights, as well as for informed and targeted policymaking¹⁰⁶.

Despite the officially acknowledged dimension in Greece of underreporting in the incidents of harassment and violence at work, there is an increase of incidents of sexual harassment, abuse and exploitation in power relations, including the workplace, politics, sport, arts and educational settings¹⁰⁷. The GNCHR has also welcomed the courage of the gold medallist in sailing Sofia Bekatorou to publicly denounce the incident of sexual abuse she suffered at a young age, in the context of exploitation in a power relation and hierarchy in the workplace and has emphasized to its public Statement that access to justice for victims of sexual violence, the role of trade union by their side or on behalf of them before the Authorities, the effective investigation of violations of sexual life and freedom and the fair administration of justice are among the most fundamental aspects of the protection of fundamental rights.¹⁰⁸ The National Commission has underscored the importance of the restoration of institutional tripartite social dialogue with explicit mandate on zero tolerance and targeted actions on i) the timely intervention to protect victims of sexual violence, also in cases it has multiple basis (i.e. domestic violence, racist motive), the effective judicial protection of

¹⁰⁴ 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.

¹⁰⁵ UN Human Rights Council, Visit to Greece: Report of the Working Group on discrimination against women and girls, A/HRC/44/51/Add.1, April 2019. The WG experts are concerned that there is uneven coordination of support services for victims of the various forms of gender-based violence, as well as programmes for perpetrators

¹⁰⁶ GNCHR, Stakeholder Report to the Universal Periodic Review (UPR) of Greece UN Human Rights Council, 39th session, 25 March 2021, p. 9.

¹⁰⁷ League for Women Rights, Press Release, 15.1.2021.

¹⁰⁸ [Δήλωση της ΕΕΔΑ](#) για τα φαινόμενα σεξουαλικής κακοποίησης στο πλαίσιο εκμετάλλευσης σχέσης εξουσίας με αφορμή τις πρόσφατες καταγγελίες στο χώρο του αθλητισμού, 2021.

their rights and the victims' access to fair justice through effective, transparent and confidential and without delay procedures, ii) the strengthening of all services dealing with cases of sexual harassment and abuse, such as health structures, police, psychological, social and legal support services, telephone hotlines and accommodation to women under threat, iii) the systematic and regular collection of detailed, reliable and comparable data, iv) the adoption and strengthening of awareness-raising and information activities aimed at preventing and raising awareness of the rights of victims, while encourage them to break their silence.

As it concerns the Ombudsman's Special Reports on Equal Treatment of the year 2024¹⁰⁹, the GNCHR: i) notes that the data presented on labour cases are not reflected to Labour Inspection's data, and ii) concurs with Ombudsman's legislative and administrative proposals.

Gender equality and third country nationals

Despite the explicit regulatory framework on the prohibition of work-related discrimination against third country national workers (Law 4443/2016), migrants' and refugees' integration in Greece, is seriously hindered also due to the legal and administrative obstacles faced by them in accessing their rights (work, education, health, housing)¹¹⁰. This situation has an important negative impact against women third country nationals, which is hidden in terms of data, but known to the National Commission via information given by GSEE and its trade union organisations through their action in the field. For example, asylum applicants' and refugee access to the labour market has been further hindered by obstacles (mainly delays) in acquiring a Foreigner's Temporary Insurance and Health Coverage Number (PAAYPA)¹¹¹, which is a requirement for employment. The framework under which PAAYPA is granted remains vague, while the transition from PAAYPA to AMKA (the steady social security number) has proved particularly time-consuming (in many cases it reaches a year for the procedure to be completed) and hindered even more legal access of this population to the labour market and to healthcare. As the Greek National Commission for Human Rights has noted in September 2020, "in practice, it is ascertained that asylum seekers cannot benefit from the right to work, as the documents of ERGANI have not yet been adapted so that PAAYPA holders can be included, while due the coronavirus and the difficulty in renewing international protection applicants' cards, employers are reluctant to employ staff with an expired card"¹¹². Also, due to administrative constraints,

¹⁰⁹ Ombudsman, [Special Annual Report](#) on Equal Treatment 2024.

¹¹⁰ [Joint NGO Briefing on the situation in Greece](#), 27 October 2021. See also, GCR, [Open letter of 17 organizations to the Minister of Migration](#), 2020.

¹¹¹ AIDA [Country Report on Greece](#) (2020) pp 182. See also GCR, [Joint Submission](#) by 25 Organizations on Incidents of Human Rights Violations Affecting Asylum Seekers.

¹¹² GNCHR, [Annual Report](#) on the Refugee and Migration Issue: Part B, September 2020, p.124.

important delays in renewal of migrants'/refugees' residence permits, lead them to be employed with expired residence permits on an undeclared status, without any fault attributable to them. This phenomenon, which has an important gender aspect, but invisible in data, is further aggravated by the increased seasonal labour needs during the summer and the increased risk of labour exploitation and forced labour in case of employed beneficiaries of international protection with expired residence permits. There is a need to take into consideration the worsening situation created by the respective legal framework (Law 5307/2026) on the implementation of the Pact on Migration and Asylum¹¹³ and highlight the links between this legislation and the repercussions on the population referred to above.

Gender dimension in Human Rights' Impact Assessment (HRIA)

The GNCHR has to highlight the cumulative adverse effects of previous human rights violations that have remained unaddressed by the Government, compounded by new violations arising from subsequent legislative and policy measures, as well as the absence of an official and reliable human rights' impact assessment mechanism. Moreover, the National Commission underscores the cumulative effect of the imposed anti-labour measures of the period 2010-2025, which, while undermining collective labour rights, have resulted in the establishment of the supremacy of employers' managerial prerogative with a severe impact (among others) on gender equality in employment and occupation. It is more than obvious that the Greek labour market retains its permanent characteristics of great and increasing flexibility and is unprotected and deprived of binding principles and rules that have hitherto ensured the right to decent work and the substantial application of gender equality and non-discrimination at work.

As it concerns the relevant provisions with respect to working parents, the Greek National Commission for Human Rights reiterates its comments on the draft Bill of Law 4808/2021 *"Also, the GNCHR expresses its concern over the implementation of flexible arrangements as to employment terms for working parents, especially given that this is combined with a general flexibility as regards working time, which is promoted in other provisions of the same Draft Law. The GNCHR recommends to the competent Authorities to ensure the guarantees of transparency and objectivity, as well as the prohibition of discrimination against workers on grounds of exercising the aforementioned rights"*.¹¹⁴

¹¹³ See GNCHR [Observations on the draft law of the Ministry of Migration and Asylum](#), 5 June 2026 and GNCHR, [The GNCHR in the Parliamentary Committee on the draft law of the Ministry of Immigration and Asylum](#), 12 June 2026.

¹¹⁴ GNCHR [Observations on Draft Law of Ministry of Labour and Social Affairs](#) "On the Protection of Employment – Establishment of the Independent Authority 'Labor 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”.