

Memorandum on the human rights of Roma in Greece

Introduction

1. The Council of Europe Commissioner for Human Rights (hereinafter the Commissioner) carried out a visit to Greece, from 3 to 7 February 2025. The visit was part of a series of country visits taking place in the context of the Commissioner's priority work on the human rights of Roma and Travellers¹ across the Council of Europe area. It also provided the Commissioner with an opportunity to discuss issues related to migration management and border control.² The visit was preceded by engagements with the Roma communities living on the outskirts of Thessaloniki, during a mission conducted on 28-29 June 2024.³
2. According to his mandate, the Commissioner fosters the effective observance of human rights; assists member states in the implementation of Council of Europe human rights instruments, in particular the European Convention on Human Rights (ECHR); identifies possible shortcomings in the law and practice concerning human rights; and provides advice and information regarding the protection of human rights across the region.⁴
3. This memorandum presents the Commissioner's key findings and recommendations from his above-mentioned visit and mission in relation to human rights issues faced by Roma in Greece, drawing on his engagement with the authorities, members of the Roma communities, as well as civil society and other actors.
4. The migration-related human rights issues in Greece have been addressed in a separate memorandum which was published on 6 May 2025.⁵
5. The findings and recommendations contained in the present memorandum are not exhaustive and should be considered in conjunction with recommendations by other Council of Europe and international human rights bodies, as well as the guidance provided by national human rights structures.⁶
6. During the February 2025 visit, the Commissioner discussed issues pertaining to the human rights of Roma with the then Minister of Social Cohesion and Family Affairs Sofía Zaharáki, the Deputy Minister of Foreign Affairs Alexandra Papadopoulou, the Greek delegation to the Parliamentary Assembly of the Council of Europe, the General Prosecutor of the Supreme Court Georgia Adeilini and her Deputy Stelios Kostarellos, the Greek Ombudsman Andreas Pottakis, the National Commission for Human Rights, and the Deputy Mayor of Balandra. He also met with a number of experts, legal professionals and civil society organisations, and engaged with the Roma community

¹ The term "Roma and Travellers" is used at the Council of Europe to encompass the wide diversity of the groups covered by the work of the Council of Europe in this field: on the one hand a) Roma, Sinti/Manush, Calé, Kaale, Romanichals, Boyash/Rudari; b) Balkan Egyptians (Egyptians and Ashkali); c) Eastern groups (Dom, Lom and Abdal); and, on the other hand, groups such as Travellers, Yenish, and the populations designated under the administrative term "Gens du voyage", as well as persons who identify themselves as Gypsies. The present is an explanatory footnote, not a definition of Roma and/or Travellers.

² See Council of Europe Commissioner for Human Rights, [End-of-visit statement](#), Greece: the Commissioner calls for accountability for human rights violations committed at the borders and intensified efforts to honour the human rights of Roma, 11 February 2025.

³ See Council of Europe Commissioner for Human Rights, [End-of-mission statement](#): Commissioner O'Flaherty raises alarm on LGBTI rights, pledges to partner with Roma, 2 July 2024.

⁴ [Resolution \(99\)50](#) on the Council of Europe Commissioner for Human Rights, adopted by the Committee of Ministers on 7 May 1999.

⁵ Council of Europe Commissioner for Human Rights, Memorandum on migration and border control management following his visit to Greece, [CommHR\(2025\)16](#), 6 May 2025.

⁶ See, among others, ECRI [report](#) on Greece (sixth monitoring cycle), June 2022; GREVIO, [Baseline Evaluation Report on Greece](#), November 2023; FRA, [Roma in 10 European countries. Main results – Roma Survey 2021](#), 25 October 2022; [ECSR, Conclusions on Greece 2019](#).

living in Halandri. On 10 February 2025, the Commissioner also met online with the Minister of Citizen Protection Michális Chryssohoïdis.

7. While in Thessaloniki in June 2024, the Commissioner engaged with Roma communities and met with Roma civil society organisations in the Agia Sofia and Dendropotamos neighbourhoods. In addition, his team visited Roma families in the Tsairia informal settlement.
8. The Commissioner thanks the Greek authorities in Strasbourg and in Athens for their assistance in organising this visit. He is also grateful to the various interlocutors with whom he met, for the information, insights and testimonies they shared.
9. Section I of this memorandum provides an overview of general developments in Greece as they relate to the human rights of Roma. Section II focuses on the right to adequate housing and related essential services. Section III examines the treatment of Roma by law enforcement authorities.
10. The Commissioner looks forward to continuing his dialogue with the Greek authorities on the issues addressed in this memorandum.

I. General situation

11. The Commissioner acknowledges the efforts of Greece to address the human rights situation of the Roma communities. In particular, the National Strategy and Action Plan for the Social Inclusion of Roma 2021-2030 (hereinafter the Strategy) recognises the key challenges faced by Roma. It provides a comprehensive framework to address these challenges and aims to tackle discrimination, poverty, social exclusion, inadequate living conditions and lack of access to essential services which the Roma communities often face.
12. The Commissioner notes the important work of the General Secretariat for Social Solidarity and Fight against Poverty, which acts as the national body responsible for the coordination and monitoring of Roma social inclusion policies, as well as the National Contact Point for Roma Inclusion in coordinating, monitoring, and facilitating the implementation of the Strategy. The Commissioner observes that the Strategy also gives an important role to the regional and local authorities in its implementation, recognising that the challenges faced by Roma communities may be specific to particular regions and local contexts.
13. The Commissioner also notes the crucial role of civil society organisations in empowering the Roma communities and defending their human rights. Roma-led organisations, civil society organisations and legal professionals supporting Roma play a crucial role in mobilising and cooperating with other stakeholders, including National Human Rights Structures, with a view to improving the human rights situation of Roma communities in the country across all areas of their lives.
14. Interlocutors nevertheless stressed that many obstacles and structural problems continue to hinder Roma inclusion within Greek society, and the full and effective enjoyment of their human rights.

II. Access to adequate housing and related essential services

15. According to the latest *Update on Roma settlements and population mapping* carried out in 2021 by the General Secretariat of Social Solidarity and Fight Against Poverty, with the participation of the Municipalities, the total population of Roma in Greece amounted to 117,495 people, living in 462 areas. These areas are classified into three types, described as follows:
 - Type I: 77 “degraded settlements”, in which 12,216 people lived in huts and shelters and lacking basic infrastructure. These settlements consist of self-made shacks and shelters in isolated and/or environmentally hazardous areas.
 - Type II: 122 “mixed areas”, in which 46,838 people lived in blended houses with short-term facilities (huts and shacks, tents, prefabricated containers), often used on a permanent basis, and partial infrastructure, usually in the vicinity of a built-up area.

- Type III: 67 “neighbourhoods”, in which 34,741 people lived in impoverished/ disadvantaged urban areas (mainly houses, building- apartment flats or detached houses and some containers).

In addition, the authorities indicated that 23,700 Roma people were registered as living in 196 “scattered households”.

16. Several interlocutors stressed, however, that the official figures may not fully reflect the situation, due in part to the reported reluctance of some municipalities to acknowledge the presence of Roma within their jurisdiction. The Commissioner also heard that widespread antigypsyism, fuelled by traditional and social media, as well harmful political discourse, dissuades many Roma from self-identifying as such. The Commissioner notes that some civil society organisations and international bodies refer to an estimated population of 265,000 Roma living in Greece.⁷ During his visit, Roma rights advocates stressed the need to collect updated and accurate data to allow for an adequate assessment of the needs of the Roma communities, and to ensure the design of adequate housing policies and the allocation of sufficient funding.
17. The Commissioner had the opportunity to visit three Type I settlements and to engage with the Roma communities living there. In the Tsairia settlement, located near the international airport of Thessaloniki, under the jurisdiction of the Municipalities of Thermaikos and Thermi, 30 to 40 families have lived there for over three decades in precarious conditions. The families live in shacks, without direct access to the water and electricity grids, household waste collection services, public transportation or access roads. As a result, the residents of Tsairia resort to makeshift electricity and water connections in order to meet basic needs, which exposes them to safety and legal risks.⁸
18. The Agia Sofia settlement, an isolated informal settlement located in the area of Thessaloniki, hosts around 3,500 Roma in an arrangement of shacks, makeshift houses and some more robust constructions, with limited infrastructure supporting the local community. During his visit to the kindergarten, the Commissioner observed that it was undersized and underequipped to host the more than hundred children present at the time: the building was composed of two rooms, with a limited number of seats, only one toilet and no insulation to protect the children and staff from extreme temperatures. The staff, and the Roma women and girls he met there, told the Commissioner that the conditions prevailing in many makeshift houses within the settlement were worse, due to overcrowding and the lack of a sewage system in the settlement.
19. The third ‘Type I’ settlement visited by the Commissioner is located in Halandri, a municipality in the Northeast of Athens, where Roma families settled on private land in 1971. At the time of the Commissioner’s visit, around 250 people, including 110 children, lived in shacks without formal connection to the electricity, water or sanitation grids. The Commissioner notes that the proximity of public transportation networks and the support provided by the local authorities may contribute to giving the local Roma community easier access to certain essential services, such as education and healthcare.⁹ Nevertheless, and despite the efforts of the inhabitants to improve their dwellings/render their dwellings habitable, the Commissioner observed that housing conditions were very poor. Most shacks were overcrowded, made of salvaged material, non-waterproofed, and heated with coal stoves which expose their inhabitants to air pollution and safety risks. Residents also informed the Commissioner that there were rodent infestations.
20. The Commissioner also visited a Type III site in the outskirts of Thessaloniki. The Dendropotamos neighbourhood appeared similar to many other disadvantaged urban areas and was composed of houses and apartments. While the material conditions were better than in ‘Type I’ settlements, most

⁷ E.g. Minority Rights Group, [Roma in Greece](#); ECRI [report](#) on Greece (sixth monitoring cycle), op.cit.

⁸ In this regard, the Commissioner notes that, in a [decision](#) on Complaint No. 206/2022 submitted by *DCI, FEANTSA, MEDEL, CCOO and ATD Fourth World v. Spain*, published 26 February 2025, the European Committee of Social Rights concluded that “stable, consistent and secure access to adequate energy” is a prerequisite for, and a key element of, enjoyment of the rights to housing, health, education, and protection against poverty and social exclusion under the European Social Charter. The Committee further stressed that, to be “adequate” for the purposes of the Charter, energy must be affordable, clean and sustainable.

⁹ See below, paras. 27 f.

of its 3,500 inhabitants were Roma, and the neighbourhood was isolated from the rest of the city by a highway, a railway and a wasteland, making Dendropotamos a de facto segregated area.

21. Against this background, the Commissioner welcomes the fact that the right to housing is an important feature of the Strategy, in particular under its second pillar entitled "Enhancing equal access of Roma to basic services and goods (education, employment, health, social care and housing)". He also takes note of the Legislative Framework for the Temporary Relocation of Special Social Groups,¹⁰ according to which, municipalities with Type I Roma settlements under their jurisdiction are responsible for providing the residents with basic goods and services, and for ensuring decent living conditions. This framework further provides that Roma living in conditions of extreme deprivation should be relocated, and that measures should be taken to ensure that they enjoy improved living conditions, with the aim of gradually achieving full social inclusion. According to the General Secretariat for Social Solidarity and Fight against Poverty, proposals for housing interventions are prepared and submitted by the municipalities in line with criteria set out in the legislative framework. They are evaluated by a specialised Technical Support Team and approved by the inter-ministerial Committee for Temporary Relocation of Special Social Groups, leading to the issuance of a Joint Ministerial Decision for each relocation or for the improvement of living conditions.
22. The Commissioner was also informed of a new targeted call under this Legislative Framework, addressed by the Greek government to municipalities, regarding "Temporary Relocation Development, Replacement and/or Expansion of Networks of Infrastructure for the Improvement of Living Conditions of Special Social Groups (Roma)" with a total budget amounting to 15 million euros. The initiative aims to improve the living conditions of Roma through different kinds of actions: the creation of "Organised Places of Temporary Relocation", and the "Development, replacement and/or extension of networks infrastructure for the Improvement of Living Conditions" (e.g. sewage network, rainwater, transportation network, etc).
23. The Greek authorities also drew the Commissioner's attention to the fact that Roma, like all Greek citizens, have access to the general housing programme and to social benefits. However, according to several interlocutors, turning to the regular housing market is, in practice, very difficult for Roma due to discrimination. As underlined by European Commission against Racism and Intolerance (ECRI), "landlords are reportedly reluctant to rent flats to Roma and because of negative attitudes towards Roma prevailing in large parts of Greece, local authorities allegedly have a favourable attitude towards evictions."¹¹
24. The Commissioner notes that the municipality of Halandri has initiated a programme of gradual evacuation of the settlement. According to representatives of the municipality, with whom the Commissioner met, this programme includes a combination of actions for 40 families, with three different objectives: i. addressing the problem of housing and eliminating the miserable living conditions; ii. developing support services for social inclusion; iii. Empowering and mobilising the local Roma community in order to foster their active participation in the programme.¹² Tools mobilised in this context include a rent subsidy, supported by the municipality of Halandri and the region of Attica, which was initially allocated to 13 families who moved out of the settlement, as well as so-called voluntary removals with financial support, which has led to the relocation of more than one hundred people.
25. Despite these welcome efforts, the Commissioner observes that many obstacles continue to hinder the Roma communities' full enjoyment of their right to adequate housing. According to the Greek authorities, only 85 out of 142 municipalities hosting Roma have submitted the Local Action Plans for Roma social inclusion, which they have the responsibility to design and implement, taking into account local needs and in cooperation with local stakeholders, including Roma organisations and civil society.¹³ Furthermore, several interlocutors stressed that the submission of a Local Action Plan

¹⁰ Law 4483/2017-OG 107/A/31.07.2017.

¹¹ ECRI [report](#) on Greece (sixth monitoring cycle), op.cit.

¹² Municipality of Halandri, Report and proposals for the Social Inclusion of the Roma of the Municipality of Halandri, 18 May 2021.

¹³ The Commissioner notes numerous reports about Roma negative stereotyping and hate speech by local officials. For example, a [video](#), widely circulated online, captured the mayor of Perama verbally assaulting and threatened a Roma woman and her children before spraying them with water in May 2024. A complaint lodged with the Greek Ombudsman by three NGOs concerning this incident is pending.

does not always lead to concrete and prompt change in the field due to various factors, including a lack of political will.

26. The Commissioner also notes that, in the municipalities which are supportive of Roma, the measures taken by the local authorities are reportedly not always sufficient nor fully adapted to solve the housing problems. In Halandri, for example, the local authorities brought to the Commissioner's attention the fact that the 'rent subsidy' mechanism has not led to the full inclusion of the relocated families within society, including due to the limited duration of the programme and the absence of accompanying measures. They also pointed to the reluctance of non-Roma landlords to rent houses and apartments to Roma families, as well as insufficient funding in order to make a voluntary removal attractive to Roma families.¹⁴ It is reported in this context that, beyond the immediate improvement of the living conditions of the beneficiaries of such programmes, special attention should be paid to the risks of secondary segregation and of "disguised eviction."¹⁵
27. The persistent, significant number of settlements also illustrates the limitations of the Strategy. People remaining in these settlements continue to live in poor material conditions, particularly in Type I and II settlements, which not only affect their right to adequate housing, but also access to a range of other essential services, such as employment, education and healthcare. In Tsairia, for example, the lack of access to public transportation obliges parents to drive their children to and from school themselves during regular working hours. The Commissioner also received testimonies that the combination of muddy conditions and lack of proper water supply to settlements like Tsairia, or the Sofos settlement located in Aspropyrgos, creates obstacles to accessing education. A woman explained that, when the children get muddy due to the rain and the absence of proper roads in the settlement, the lack of water supply makes it hard to wash them and their clothes adequately in order to go to school. Further, in case of an emergency, ambulances cannot reach the Tsairia settlement and residents have to drive residents requiring emergency care on muddy paths full of holes to a supermarket carpark located 1.5 km away, in order to transfer the person in question to an ambulance and access care.
28. The Commissioner notes that, in addition to the precarious material conditions, Roma people living in settlements, in particular Types I and II settlements, are confronted with legal precarity. They are at risk of heavy fines for unlawful occupation, which, according to Roma rights advocates, hinder relocation, as significant debts preclude loan eligibility and may even lead to criminal charges if the debt surpasses 100,000 euros.¹⁶ They are also at risk of forced evictions. The Commissioner notes, for example, that the residents of Tsairia were issued an eviction order in 2019. Roma residents have reportedly consistently expressed their willingness to relocate for better living conditions, closer to the city and the rest of the population, but have not been offered any sustainable alternatives. The Commissioner notes that the eviction order, issued by the municipality of Thermaikos, was challenged before national courts and that, in February 2022, the European Court of Human Rights (the Court) issued an interim measure suspending the eviction due to insufficient assurances regarding alternative housing for the applicants and their minor children. This interim measure was prolonged on 17 March 2022 until further notice. Nevertheless, at the time of the Commissioner's visit, no sustainable alternative had been proposed to the Roma community of Tsairia, who live in constant fear of being forcibly evicted.
29. The Commissioner notes that, in its 2019 Conclusions on Greece, the European Committee of Social Rights (ECSR) found that the situation prevailing in Greece was not in conformity with Article 16 of the European Social Rights Charter (the Charter - right of the family to social, economic and legal protection), having regard *inter alia* to the fact that many forced evictions of Roma had taken place without specifying in advance a suitable place to install a safe and legal settlement.¹⁷ The ESCR

¹⁴ *Ibid.*

¹⁵ There might be a risk of secondary segregation if the new locations are not in proximity to the urban fabric of the respective municipalities, and a risk of "disguised eviction," if the Roma families concerned face pressures, including potential fines for unauthorised occupation. See G. Tsiakalos, "Greece: Unclear desegregation effect of Chalandri's dismantlement of a Roma settlement," in Marek Hojsik (ed.), *Examples of successful housing desegregation as a precondition of Roma integration*, 2023.

¹⁶ See G. Tsiakalos, "Greece: Unclear desegregation effect of Chalandri's dismantlement of a Roma settlement," *op.cit.*

¹⁷ In this connection, the Committee referred to its decisions in [European Roma Rights Centre v. Greece](#), Complaint No. 15/2003, decision on the merits of 8 December 2004, and [International Centre for the Legal Protection of Human Rights \(INTERIGHTS\) v.](#)

further considered that the situation was not in conformity with the Charter on the ground that Greece had neither demonstrated that there was adequate legal protection for persons threatened by eviction, nor proved that there were sufficient procedures in place to ensure that evictions of Roma are carried out in conditions respecting the dignity of the persons concerned. Forced evictions of Roma settlements in Greece have been also criticised by the United Nations Human Rights Committee in two decisions.¹⁸ More recently, ECRI have recommended “that the Greek authorities ensure that Roma are not evicted illegally without proper notice or opportunity for rehousing in decent accommodation and, in this context, enjoy effective access to adequate legal aid.”¹⁹

30. Recommendations:

The Commissioner recommends that the Greek authorities:

- Collect statistical data enabling the adequate planning and implementation of measures addressing the human rights challenges faced by Roma communities in areas such as housing.
- Speed up the implementation of the National Strategy and Action Plan for the Social Inclusion of Roma 2021-2030, in order to address the situation of marginalised Roma communities living in inadequate conditions and prevent further deterioration of their already-critical human rights situation.
- Pay special attention to the needs of the most vulnerable, including women, children, persons with disabilities, and older people.
- Enhance the coordination of the national, regional and local authorities' efforts to implement the existing policies, in order to ensure Roma access to adequate, sustainable and desegregated housing.
- Better monitor the fulfilment by all municipalities of responsibilities in the area of housing, to ensure that their Local Action Plans are effectively implemented in close consultation with the communities and civil society organisations.
- Ensure that all Roma settlements are connected to the water and electricity grids, including pending relocation or other measures to ensure access to adequate housing.
- Refrain from forcibly evicting Roma settlements without provision of sustainable and adequate alternative housing solutions.
- Ensure that Roma have effective access to the general housing programmes, including by taking targeted measures addressing the specific situation and needs of Roma communities and combating antigypsyism in the housing market.

III. Treatment of Roma by law enforcement authorities

31. The Commissioner welcomes that the third pillar of the National Strategy and Action Plan is dedicated to preventing and combating discrimination and stereotypes against Roma, and that this pillar pursues various objectives, including ensuring the possibility for Roma to complain about discriminatory treatment, and raising awareness about diversity and Roma culture. He further notes that several actions are foreseen to achieve these objectives, including police training “in matters of social mediation and preventive security in selected areas with high concentrations of Roma (Regions of Attica, Central Macedonia, Thessaly and Crete)”, and the promotion of trust-building between prosecutors and communities affected by racist violence.
32. More generally, the Commissioner welcomes the appointment of special prosecutors to investigate racial discrimination and hate crimes, as well as the setting up of specialised units within the police to address these cases. He takes note of a presidential decision issued in January 2024, amending the law enforcement disciplinary framework to provide for the dismissal of law enforcement officials who are convicted of criminal and disciplinary offences. He also notes that, according to the

[Greece](#), Complaint No. 49/2008, decision on the merits of 11 December 2009, where it found a violation of Article 16 in respect of the situation of Roma precisely on this particular ground.

¹⁸ UN Human Rights Committee, [Georgopoulos and others v. Greece](#), communication No. 1799/2008, 29 July 2010; [‘I Elpidia’ — The Cultural Association of Greek Gypsies from Halandri and Suburbs, and Stylianos Kalamiotis v. Greece](#), communication No. 2242/2013, 3 November 2016.

¹⁹ ECRI, [report on Greece](#) (sixth monitoring cycle), June 2022.

information provided by the Greek authorities to the UN Committee on the Elimination of Racial Discrimination (CERD), between 2017 and 2024 the police referred approximately 1,300 complaints of police violence to the Greek Ombudsman, who holds a special mandate as the National Mechanism for the Investigation of Arbitrary Incidents in the security forces and by the employees of detention facilities.²⁰ The Commissioner welcomes the repeal of Law No. 29/1943 on the use of firearms, which the Court considered uncertain,²¹ and the introduction of a comprehensive legislative framework for the use of firearms by the police.

33. Despite these positive developments, the Commissioner was informed that relations between the Roma communities and law enforcement remain strained. Interlocutors complained about the alleged passivity of law enforcement authorities as regards racist and discriminatory acts affecting Roma. The residents of the Tsairia settlement reported, for example, that caravans installed by 16 families on a piece of land which they legally bought in Heraklion Lagkada in 2020 were set on fire, but that the police did not adequately investigate this incident. As a result, no one was held accountable, despite several complaints lodged with the police, and the victims did not obtain reparation.
34. Interlocutors stressed that many Roma are afraid of and mistrust the police.²² The Commissioner understands that the Roma's lack of trust in the police is linked to discriminatory treatment and various forms of violence by the police that many of them have reportedly experienced. Several interlocutors stated that many Roma are victims of police harassment, consisting of repeated imposition of fines for petty offences, for example selling garlic or chicory at farmers' markets without a licence or driving with a broken light. Roma are also pursued for some offences which directly result from their housing conditions, in particular the illegal tapping of water and electricity in settlements which are not connected to the relevant grids. During the COVID-19 pandemic, people living in settlements with no connection to the water grid were reportedly fined for breaching movement restrictions while fetching water. In the Commissioner's view, this situation further illustrates the pivotal nature of the right to housing: Roma deprived of adequate housing, especially those living in Type I and II settlements, may be compelled to resort to informal solutions to meet their basic needs, which exposes them to sanctions, and which may then possibly prevent them from accessing relocation.²³ The Commissioner observes that this vicious circle also feeds crime statistics and contributes to the negative representation of Roma in society.
35. Furthermore, the Commissioner is concerned about consistent and repeated reports of police raids carried out in Roma settlements, during which law enforcement officers have resorted to verbal and physical violence. In Tsairia, members of the Roma community complained about recurring police operations in the settlement, which they perceive as intimidation aimed at getting them to leave the place. During his visit to Halandri, the Commissioner was told that the police would raid the settlement on a regular basis, entering and searching the shacks. According to testimonies, several residents were accused of theft and personal belongings were confiscated as the relevant invoices could not be presented. Racist insults were also reportedly directed to the inhabitants of the settlements by the police during such operations.
36. The Commissioner is concerned about the allegations of police violence during successive raids carried out in Halandri on the 31 May, 3 and 4 June 2024. The Commissioner received information during his visit that, after a police vehicle was damaged by a group of drunk residents and young children from the settlement, a large number of police officers reportedly entered the settlement at around 12:30am on 31 May, shouting racist insults, beating residents and damaging their property, including the doors and windows of several shacks as well as 25 cars. Two residents of the

²⁰ UN Committee on the Elimination of Racial Discrimination, [Concluding observations](#) on the combined twenty-third and twenty-fourth periodic reports of Greece, CERD/C/GRC/CO/23-24, 24 December 2024.

²¹ See the judgments belonging to the [Sidiropoulos and Papakostas group](#).

²² The Committee on the Elimination of Racial Discrimination of the United Nations recently expressed concern about the "low level of reporting of complaints related to racial discrimination and hate crimes reportedly because of a lack of trust by victims in the law enforcement agencies, widespread fear of reprisals by law enforcement officials, gaps in the State party's anti-racial discrimination structure, lack of awareness about complaint channels and the rights of victims, and the perception that hate crimes are normalized and widespread." UN Committee on the Elimination of Racial Discrimination, [Concluding observations on the combined twenty-third and twenty-fourth periodic reports of Greece](#), *op. cit.*

²³ As mentioned above, para. 28, significant debts preclude loan eligibility and, when surpassing 100,000 euros, may lead to criminal charges.

settlements were reportedly arrested and detained for several hours at the local police station, with staff refusing their request to be seen by a medical professional during this time. In the early morning of 3 June, the police conducted another operation in the settlement, during which a woman was reportedly stripped-searched by two police officers, in front of a prosecutor. Eleven men were arrested, one of them allegedly stripped-searched and sexually abused by a police officer. In the afternoon of the same day, 30 to 40 police officers on foot, accompanied by about 10 motorcycles, reportedly came to the settlement, entering dwellings without permission and chasing residents, including children, uttering slurs in reference to their ethnicity, and threatening to burn the settlement. Another police operation took place in the settlement in the afternoon of 4 June 2024.

37. These allegations of serious misconduct were brought to the attention of the Greek Ombudsman, with the hope that these incidents would be investigated under the Ombudsman's special mandate as National Mechanism for the Investigation of Arbitrary Incidents. The Commissioner understands that proceedings are underway before the Ombudsman and looks forward to being informed about the outcome of these proceedings. Considering the gravity of these allegations, he would also appreciate being informed as to whether any criminal investigations are launched, to shed light on this course of events and hold those responsible accountable.
38. Finally, the Commissioner is very concerned about the deaths of three young Roma, shot by the police in recent years. On the night of 22 October 2021, Nikos Sampanis, an 18-year-old Roma from Aspropyrgos, was shot dead by the police during a car chase. More than 45 bullets were allegedly fired by seven police officers towards a reportedly stolen car, with three unarmed Roma teenagers inside. The Commissioner notes that the then Minister of Citizen Protection visited the seven police officers while they were being held at the police headquarters, and that Minister of Development and Investment publicly congratulated the officers on social media. On 5 December 2022, a 16-year-old Roma resident of the Agia Sofia settlement, Kostas Fragoulis, was shot by a police officer after having reportedly left a gas station without paying the 20 euros he owed for fuel. He died from his injuries on 13 December 2022. While in Thessaloniki, the Commissioner met with the relatives of Kostas Fragoulis, who shared their grief and called for justice. On 11 November 2023, Christos Michalopoulos, a 17-year-old Roma was shot dead by the police after a car chase in Thebes. Criminal inquiries are ongoing and the relatives of the deceased have complained about delays in conducting the investigations.
39. The Court has found violations in several cases of both the substantive and the procedural limbs of Article 3 (prohibition of torture and inhuman or degrading treatment) of the European Convention on Human Rights (ECHR), as well as a violation of Article 14 (prohibition of discrimination) of the Convention taken in conjunction with Article 3, resulting from the failure of the Greek authorities to investigate possible racial motives behind the applicants' ill-treatment, combined with a generally biased attitude throughout the investigations.²⁴
40. The recent judgment of *Panayotopoulos and Others v. Greece*²⁵, delivered on 21 January 2025 concerns three Roma who were allegedly subjected to racist abuse and violence, including being beaten, by police while in custody, in an attempt to extract information and confessions. The Court concluded that there had been a violation of Article 3 of the Convention under its procedural limb, in view of the multiple shortcomings at all stages of the investigation into the abuse, the lack of forensic examination, the discrepancies between the statements of the arresting officers (which cast doubt on the thoroughness of the investigation), and the excessive length of the criminal and the administrative investigations. The Court further found a violation of that provision under its substantive limb in respect of the first and third applicants. Finally, the Court concluded that the authorities had failed in their duty under Article 14 of the Convention (prohibition of discrimination), taken together with Article 3, to take all possible steps to investigate whether or not discrimination may have played a role in the events in question.
41. The information received by the Commissioner during his visit, which echoes multiple reports issued by civil society organisations and international human rights mechanisms over many years, as well

²⁴ See ECtHR, *Bekos and Koutropoulos v. Greece*, no. 15250/02, 13 December 2005; *Petropoulou-Tsakiris v. Greece*, no. 44803/04, 6 December 2007; *Stefanou v. Greece*, no. 2954/07, 22 April 2010.

²⁵ ECtHR, *Panayotopoulos and Others v. Greece*, no 44758/20, 21 January 2025.

as the case-law of the Court, indicates that, despite steps taken to address this phenomenon, the problem of police violence against Roma goes beyond a series of isolated incidents and reflects deeply embedded racism.

42. The execution process of the judgment delivered by the Court in the case of *Panayotopoulos and Others v. Greece*, and the ongoing supervision of the *Sidiropoulos and Papakostas* group of judgments concerning ill-treatment by law enforcement agents and the lack of effective investigations, will provide an opportunity for the Greek authorities to address these concerns.

43. **Recommendations:**

The Commissioner recommends that Greek authorities:

- Ensure prompt and effective investigation into all allegations of violence, racism and discrimination against Roma, including by members of the law enforcement authorities, with due consideration given to any possible racist motive.
- Strengthen the training of law enforcement officers and the judiciary on human rights-compliant policing.
- Collect and publish data regarding disciplinary and criminal investigations into allegations of racial profiling, racially-motivated police violence and excessive use of force by members of law enforcement.
- Adopt a zero-tolerance policy regarding hate speech and stigmatising narratives targeting Roma, including by elected officials.
- Further support the Ombudsman's special mandate as Mechanism for the Investigation of Arbitrary Incidents, including by providing the necessary financial and human resources to perform his tasks and take measures to ensure the cooperation of law enforcement, including as regards the implementation of the Ombudsman's recommendations.
- Implement the relevant judgments of the European Court of Human Rights, in line with the relevant decisions delivered by the Committee of Ministers in the context of the supervision of the execution of the Court's judgments.