



Convention on the Rights of Persons with Disabilities

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Consideration of reports submitted by parties to
the Convention under article 35

List of issues in relation to the initial report of Greece

Addendum

Replies of Greece to the list of issues*, **

[Date received: 5 July 2019]

* The present document is being issued without formal editing.

** The annexes on file with the Secretariat are available for consultation. It may also be accessed from the web page of the Committee.

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A. Purpose and general obligations (arts. 1–4)

Reply to paragraph 1 of the list of issues

1. Articles 59–74 of Law 4488/2017 lay the foundations for the implementation of the Convention on the Rights of Persons with Disabilities (hereinafter: the Convention) in Greece. More specifically, Article 60 introduces into national legislation a clear and comprehensive definition of the concept of disability, harmonized with the Preamble and Article 1 of the Convention. As “persons with disabilities” are defined those who have long-term physical, mental, intellectual or sensory impairments which, in interaction with various barriers, in particular institutional, environmental or attitudinal, may hinder their full and effective participation in society on an equal basis with others. Furthermore, the Law establishes general obligations of all natural and legal persons of private or public law with regard to persons with disabilities, provides for the mainstreaming of disability in all areas of public policy, regulates issues related to the universal design of public policies, administrative services, etc., reasonable accommodation, accessibility to physical, build and digital environment, access to official documents, information, awareness raising, education and training on the rights of persons with disabilities, prohibition of discrimination in the mass media and in audiovisual activities, consideration of the rights of persons with disabilities in the law-drafting process, impact assessment and collection of official statistical data. Disabilities are thus considered as an aspect of human diversity and a field where equal treatment, with full respect for the dignity of those concerned shall prevail. See also *infra*, under Question 2.

B. Specific rights (arts. 5–30)

Equality and non-discrimination (art. 5)

Reply to paragraph 2 (a) of the list of issues

2. Law 4443/2016, implementing EU Directives 2000/43 and 2000/78, which replaced Law 3304/2005, establishes a single and comprehensive regulatory framework for the implementation of the principle of non-discrimination. Among the prohibited grounds of discrimination are included disability and chronic condition. The Law applies to all persons, both in the public and the private sector, with regard to: (a) conditions of access to employment and occupation in general, (b) access to all types and levels of vocational guidance, training and retraining, including the acquisition of practical work experience, (c) employment and working conditions, including dismissals, remuneration, health and safety at work, reinstatement and re-employment of those who had become unemployed, (d) membership of and participation to trade unions of workers or employers or any professional organization, including the advantages and obligations arising from the participation therein, in particular the right to vote and to stand as a candidate.

3. The notion of disability, as a prohibited ground of discrimination, is supplemented by that of “chronic condition” for the purpose of aligning the current legislation with the rights model for the protection of persons with disabilities. According to this law, “seropositivity” is included in the protective range of disability or chronic disease.

4. The purpose of the national legislator is to establish a social model of disability to eliminate discrimination on the ground of disability. The legislator focuses on the interaction of individual and environment, treating disability as the result of the latter’s inability to meet up to the special conditions that the existence of a long term physical, mental, intellectual or sensory condition creates on specific individuals. In view of the above, the social, legal, financial or environmental factors that hinder the full exercise of the rights of persons with disabilities must be detected and eliminated. We also note that, disability as a notion has often a dynamic character and is manifested in a variety of forms, which calls for the use of a wide definition by the legislator.

5. Article 14 of Law 4443/2016 designates the Greek Ombudsman, an independent authority, as the body responsible for monitoring and promoting the implementation of the

principle of equal treatment in the fields covered by the law, both in the public and the private sectors, with regard to the abovementioned prohibited grounds of discrimination. As a result, the Committee for Equal Treatment of the Ministry of Justice, Transparency and Human Rights was abolished and the cooperation between the Ombudsman and the Labor Inspectorate redefined. This is an effort to restart the cooperation between the jointly competent agencies and services based on the promotion of the principle of equal treatment in the country and to “reconnect” with civil society.

6. According to Article 20 (5) of the same Law, “complaints or information received by a public authority regarding the application of the principle of equal treatment, within the scope of application of this law, shall be transmitted to the Ombudsman. Public services that are competent for inspection, control or imposition of sanctions on private persons, such as the local branches of the Labor Inspectorate on employers, (...) if they receive complaints regarding the application of this law, shall proceed with investigating said complaints in accordance with the law and shall immediately notify the Ombudsman both upon receiving a complaint and upon completion of any investigation or sanctions imposed”.

7. By virtue of a circular-order issued by the Ministry of Labor, Social Security and Social Solidarity, all the services of the Labor Inspectorate were notified on their cooperation with the Ombudsman regarding monitoring of the application of the principle of equal treatment.

8. The anti-racism law 4285/2014 punishes acts such as public incitement to acts or activities, which may result to discrimination, hatred or violence against individuals or groups of individuals defined by reference, inter alia, to disability, in a manner which endangers public order or threatens life, liberty or physical integrity of the abovementioned persons and the establishment of or participation in an organization or union of persons of any kind systematically pursuing the commission of the abovementioned acts.

9. In accordance with Article 70 of Law 4488/2017, the General Secretariat for Human Rights of the Ministry of Justice, Transparency and Human Rights has been tasked with drawing up a National Action Plan for Persons with Disabilities. The following main priorities have already been identified: equal opportunities, supporting the autonomy of persons with disabilities, comprehensive interventions to improve accessibility, elimination of discrimination, increasing funds for the improvement of the quality of life, organization of centers and services, improvement of professional skills.

10. The legislation on civil registries contains specific provisions for the declaration of vital events on the part of people with disabilities, blind and deaf mute, as well as the conclusion of marriages.

11. The educational program of the Police Academy has included teaching modules and lectures on the protection of the rights of persons with disabilities. With regard to postgraduate education, the Continuing Education School of the Hellenic Police, in addition to relevant courses, has organized lectures, attendance of which is compulsory, on the treatment of persons with disabilities.

12. Access to justice for low income persons with disabilities may also be guaranteed through the provision of legal aid under the provisions of Law 3226/2004. A lawyer, a bailiff and/or a public notary may be appointed by court decision, free of charge.

13. Article 2 of Law 4443/2016 provides that denial of reasonable accommodation for persons with disabilities or chronic disease is considered as discrimination. “Reasonable accommodation” is defined as necessary and appropriate modifications, regulations and measures required in a particular case to ensure that persons with disabilities or chronic disease are treated on the basis of the principle of equal treatment, which do not impose a disproportionate or unjustified burden on the employer. According to Article 5 of the Law, employers shall take all the appropriate measures, as the case may be, in order to enable persons with disabilities to have access to, participate in and advance in employment, and to undergo training, provided that such measures do not impose a disproportionate burden on the employer.

14. Discrimination on the grounds of disability or chronic condition by the employer, at any stage of access to work and employment, when entering into or when denying to enter into an employment relation or in the course, operation, development or termination thereof, shall be a violation of labor legislation for which administrative sanctions are imposed by the Labor Inspectorate. Protection is granted also after the end of an employment relation, as well as against counter-measures, i.e. protection from dismissal or unfavorable treatment of a person in general, which is manifested as a counter-measure to a complaint or request for legal protection.

15. There are several types of accommodations that the Greek educational system provides to students with disability and/or special educational needs in schools.

16. According to Law 3699/2008, accessibility to the curriculum for pupils with disabilities and/ or special educational needs is guaranteed through:

- The establishment of inclusive classes in mainstream schools at primary, secondary and vocational education level;
- The provision of parallel support services in mainstream classrooms;
- The establishment of free services for assessment and counselling;
- The provision and implementation of individual education plans;
- The possibility to benefit from special arrangements when taking exams;
- The possibility to enter university without taking exams in case of severe illnesses;
- Special arrangements regarding attendance (pupils with disabilities and/or special educational needs are allowed to be absent from school for more than 30% of the curriculum in case they receive therapy or rehabilitation treatment);
- Provision of school nurses and Special Support Personnel on a one-to-one basis in mainstream schools;
- Tuition at home;
- Provision of sign language interpreters and hearing aids or other means, like Braille materials, for pupils with sensory disabilities of hearing and vision to access the curriculum.

17. In addition, the Ministry of Education provides pupils with special equipment and covers a substantial part of the expenditure of the supportive technology of students with disabilities, by providing wheelchairs, hearing aids, PCs and printers with appropriate software as well as programmes on Braille.

Reply to paragraph 2 (b) of the list of issues

18. In the school year 2018/19, a first attempt to record refugee children with disabilities and/or special educational needs who stay in hosting facilities with a view to place them in appropriate school settings was made, in cooperation with the Department for the Coordination and Monitoring of the Refugee Education of the Ministry of Education.

19. Under Greek legislation, in particular Article 14 (8) of Law 4375/2016, asylum seekers with disabilities belong to a broader category of asylum applicants, namely “vulnerable persons or vulnerable groups”. The principle of non-discrimination is protected through all asylum procedures stages, from reception to final decision, by eliminating the obstacles for access to asylum procedure and by ensuring that their application is processed by priority, nevertheless based on equal standards. Article 34 of Law 4375/2016, transposing Directive 2013/32/EU, defines that an asylum applicant with disabilities may lodge an asylum application without physical presence, by a legal representative. According to Article 27 of the same Law, particular emphasis shall be placed on developing and refining the institutional framework for standards concerning the accreditation procedures, rehabilitation and proper management of vulnerable persons included in the above groups, such as persons with disabilities or serious illness. In addition, vulnerable persons as asylum seekers enjoy special procedural guarantees and are exempted from border procedures of Article 60 (4) of Law 4375/2016.

20. In accordance with Law 4443/2016 and migration laws, the Hellenic Police is obliged to show special care during the process of reception of persons with disabilities (issuance of a 6-month suspension of the deportation/return decision with possibility of renewal, information on their rights) and to take steps for the development of a cooperation network with other competent Ministries and Agencies for the provision of accommodation in appropriate facilities.

Women with disabilities (art. 6)

Reply to paragraph 3 of the list of issues

21. Greece is currently implementing the National Action Plan on Gender Equality 2016–2020. One of its strategic priorities is social inclusion and equal treatment of women facing multiple discrimination on the basis of gender and vulnerability, such as women with disabilities.

22. The prevention and combating of violence against women in Greece has traditionally been a top priority for the General Secretariat for Gender Equality (GSGE), which is implementing since 2010 the «National Program on Preventing and Combating Violence against Women». Monitoring of the Programme’s outcomes in terms of statistical data is done through a database in which cases of women victims of gender-based violence are registered.

23. During the period from 1/1/2012 to 22/5/2019, the number of women with disabilities supported by the network of structures was 172, out of a total of almost 25.000 women, among which 96 were cases of gender-based violence, while 76 were cases of multiple discrimination. 38 were women with secondary education level (22%), 18 (10%) with university education level, 73 (42%) unemployed. 53 (31%) were between 36–45 years of age.

24. In the period 2018–2019, an awareness-raising campaign was organized that included actions regarding the needs of people with disabilities. More specifically, 3 TV spots fully accessible to people with sensory disabilities were created. A three-day Film Festival was organized in April 2019, in which one of the films presented was in SDH subtitles and AD sound. Finally, all workshops implemented under the campaign were fully accessible to people with disabilities. Part of the printed material was produced in a large-scale font and part in Braille style.

25. The GSGE was among the stakeholders who participated to the public consultation of the EU on the “Green Paper” entitled “Preparing for a Fully Converged Audiovisual World: Growth, Creation and Values – Public Consultation”, seeking to make new technologies of the audiovisual world accessible and friendly to female users with disabilities.

26. The material created in the context of the Project “Gender mainstreaming in the municipalities” has been made available to the municipalities.

27. Finally, it should be noted that the abovementioned Law 4443/2016, as well as the more recent Law 4604/2019 on promoting substantive gender equality explicitly prohibit multiple discrimination.

Children with disabilities (art. 7)

Reply to paragraph 4 of the list of issues

28. Centers for Creative Activities for Children with Special Needs, created by Municipal Enterprises and Private Non-profit Organizations aim at providing creative activities to children, promoting the latter’s participation in programs of pre-vocational education and training and providing supporting services to the children and their families and relatives.

29. The Ministry of Labor, Social Security and Social Solidarity issued in 2017 a Ministerial Decision on “De-institutionalization Program for Persons with Disabilities”, according to which persons with disabilities accommodated at the relevant branches of the

Attica Social Care Center will be transferred to a safe and supportive facility or family-type facility or they will return to their families with parallel support by the de-institutionalization program.

30. Moreover, according to article 2 of the same decision, de-institutionalization and prevention include the development of accommodation facilities for persons with disabilities, the development of a pilot program for professional fostering, the development of a short-term infrastructure facility for persons with disabilities, the creation of a mobile unit for the provision of support services to families with persons with disabilities, the development of centers for creative activities and the creation of day care centers for persons with disabilities.

31. In addition, the Standard Rules of Procedure of Municipal day care facilities and crèches provide that children who suffer from physical or mental diseases or disabilities may be registered and attend the municipal day care facilities, early childhood centers and crèches, provided that a duly qualified medical specialist certifies that attendance can be beneficial to these children and that they may be integrated into the everyday life of the facility. In this case the competent management body may designate a specialized person among the staff or an accompanying person, and, if not any, hire a specialized person.

Accessibility (art. 9)

Reply to paragraph 5 (a) of the list of issues

32. Out of a total of 13,605 schools, 5,653 have ramps, 3,097 have accessible toilets and 1,988 have lifts, a situation which is definitely unsatisfactory.

33. As part of the collaboration between the Ministry of Education and the Ministry of Interior, the municipalities, throughout the country, are being funded to make the school buildings more accessible (ramps, accessible toilets). The financing concerns the construction or prefabrication and installation of ramps and sanitary spaces for persons with disabilities at school units with a budget amounting to €35 million.

34. Each year, the Directorate of Policy for Persons with Disabilities of the Ministry of Labor, in cooperation with the Citizen Services Centers and the competent Regional Authorities, implements a program for the award of free-of-charge or reduced fare tickets for persons with disabilities, in cooperation with the providers of public transport services. The above transportation pass is also issued to the persons accompanying totally blind persons and persons with an intelligence quotient less than 30. Persons with a disability percentage higher than 67%, irrespective of income, are entitled to a Card that offers a 50% discount for long-distance transportation.

35. The General Technical Specifications and the Technical Specifications for Units annexed to Law 4600/2019 on “Modernization and Reform of the Institutional Framework of Private Clinics, Establishment of a National Public Health Organization...” contain provisions on accessibility for persons with disabilities. Other Ministerial Decisions aim at facilitating accessibility to the country’s healthcare units. All private and public health institutions follow the provisions of Law 4067/2012 on accessibility, while circulars clarify the relevant articles of the New Building Regulations.

36. The premises of the GSGE (Central Office, Library on Gender and Equality and Counseling Centers in 14 cities) dispose the entire necessary infrastructure for easy accessibility for people with physical disabilities.

37. In addition, the Library provides facilitated access to information to people with sight and hearing impairments, through the use of specialized equipment.

38. Furthermore, the Division of Simplification of Procedures of the Ministry of Administrative Reconstruction has the responsibility of shaping public policy regarding the access of persons with disabilities in public services and aims to provide and improve online public services.

39. It is noted that the problem of limitations in the accessibility of buildings housing public services is smoothed by the operation of the Citizen Service Centers (KEPs), which

operate in all Municipalities of the country and are accessible to people with disabilities. KEPs constitute a permanent channel of communication between the citizens and the entirety of the Public Administration, providing information and services to citizens and enterprises. There are 1.065 KEPs in total operating in the country, carrying out more than 1.000 procedures, while the electronic issuance of certificates is already in effect. A series of 13 services provided by KEP are available online. Expanding the scope of services provided online, in order to further reduce bureaucracy, remains a significant priority. In addition, within the framework of the National Strategic Reference Framework, the project “Digital KEP” has recently been launched, which is expected to be completed in 2021.

40. Furthermore, the operation of the Points of Single Contact – PSC (ERMIS-EUGO) contributes to the elimination of the accessibility barriers for people with disabilities in services linked to the starting of professional activities.

41. Summarizing, all the above actions shall greatly contribute in the decrease of the deficit of accessibility for people with disabilities, since they ensure the fast, cost-free, more efficient and fully accessible provision of services, thus essentially improving the daily life of all citizens.

42. The Hellenic Ministry of Culture and Sports makes every effort to develop the needed infrastructure and to implement actions designed to create a friendly environment and to ensure the right of people with disabilities to participate in the cultural life of the country.

43. All the engineering plans on construction of new Museums and Cultural Buildings or the upgrading of existing infrastructures are being implemented, according to the new technical requirements. All the spaces of the new buildings are accessible to everyone. Specifically, the existing cultural buildings and visitable monuments are being adapted to the current accessibility provisions. They are being equipped with new elevators inside or outside the buildings, with ramps in the surrounding area or inside and with sanitary facilities as well as parking spaces for people with disabilities.

44. Overall, the Hellenic Ministry of Culture and Sports has under its authority 220 Archaeological Museums and collections/exhibitions, 138 (63%) of which are accessible or partially accessible (108 accessible and 30 partially accessible) and 82 (37%) are not accessible for people with disabilities. Most of them cannot have the ability to be accessible as they are listed Monuments.

45. As far as the Archaeological sites and the Monuments are concerned, the Hellenic Ministry of Culture and Sports has under its authority 434 visitable Archaeological sites and Monuments, 151 of which are accessible or partially accessible and 61 of which have sanitary facilities for people with disabilities. In case of partially accessible spaces, Museums or other cultural buildings, information points are available with electronic – digital support for people with disabilities.

46. Additionally, the Hellenic Ministry of Culture and Sports implements, on a regular basis, 22 educational programs and organizes 47 guided tours for people with disabilities (sonic, visual or tactile). Within the framework of the project “PROSPELASIS”, training seminars were carried out, with a range of relevant themes, while a fruitful cooperation between the Ministry and the organizations of persons with disabilities is promoted (Braille guides and brochures etc.). Finally, it is important to mention the favorable arrangement for people with disabilities (67% or higher) who, together with a person accompanying them, are entitled to free admission to Archaeological Sites, Monuments and Museums of Greece and that the accessibility of persons with disabilities has been included in the design of the e-ticket installation.

47. As far as the Ministry of Tourism is concerned, the relevant laws and regulations provide that at least 5% of hotel rooms must be fit to accommodate persons with disabilities and persons with reduced mobility. In addition, specific criteria have been set out, compulsory for all types of hotel establishments, with regard to the services provided, within the accommodation, to persons with disabilities. A 2018 Ministerial Decision defined relevant standards for Furnished Rooms – Apartments to Let. Furthermore, according to Article 50 of Law 4582/2019 a new unit has been added to the Academic

Curriculum of the Advanced (Higher) School of Tourism Education (ASTE) of the Ministry of Tourism, relating to providing tourism services to persons with disabilities. Last but not least, the Ministry of Tourism frequently informs competent bodies (e.g. the Hellenic Chamber of Hotels) on the rights of persons with disabilities and visual impairments, who are accompanied by assistance dogs, in food and beverage companies which operate within accommodation establishments.

48. Since 2012, urban planning enforcement controls in Greece have become stricter, so it is believed that all private roadworthiness testing centers and service stations built after 2012 comply with accessibility rules for people with disabilities.

Reply to paragraph 5 (b) of the list of issues

49. Article 61 of Law 4488/17 states that every natural and legal person shall ensure the equal and non-discriminatory exercise of rights of persons with disabilities, mainly by a) removing existing barriers, b) developing inclusive policies, c) providing reasonable adjustments to existing policies, d) avoiding discriminatory practices, e) promoting equality in participation and exercise of rights of persons with disabilities.

Reply to paragraph 5 (c) of the list of issues

50. With regard to port infrastructures, the Ministry of Maritime Affairs and Insular Policy (MMAIP) has, since 2005, provided specific instructions to all Port Authorities for the construction of port facilities so as to further facilitate accessibility for persons with disabilities and, at regular intervals, monitors progress made.

51. In addition, the Law provides that accessibility to persons with disabilities must be ensured in newly built port infrastructures and in existing ones when repaired/ maintained. Furthermore, according to Law 4504/2017, the presence and mobility of dog guides and their instructors within Greek ports is further facilitated.

52. Recently, Law 4607/2019 provides for the possibility to grant to municipalities parts of coastal areas for the construction of installations that facilitate accessibility for persons with disabilities. Moreover, each local authority is obliged to ensure accessibility to one at least bathing facility within its jurisdiction.

53. As far as the accessibility to ships is concerned, maritime carriers are obliged to establish appropriate conditions to ensure the access of persons with disabilities and/or reduced mobility on board passenger ships.

54. Furthermore, an Advisory Body has been established to handle all issues, including relevant complaints, relating to the accessibility of persons with disabilities to all the network of short sea shipping.

55. Long distance passenger carriers have the obligation to provide assistance free of charge to persons with disabilities and persons with reduced mobility. They have also established disability-related training procedures.

Reply to paragraph 5 (d) of the list of issues

56. The Ministry of Digital Policy, Telecommunications and Media has recently undertaken the following initiatives:

57. Law 4488/2017 provides for equal accessibility to the electronic communications environment, including media and online services, and non-discrimination in the media ecosystem and the audiovisual activities.

58. A December 2008 Joint Ministerial Decision provides for a range of accessibility means (subtitling, use of Greek sign language, audio description of visual content), the procedure and the technical standards for the transmission of television programming that ensure accessibility to services provided by media and communication service providers and for the submission of annual implementation reports to the National Council for Radio and Television and the Ministry.

59. Furthermore, Joint Ministerial Decision 1686/2018 sets out specific provisions on content and transmission terms of social messages, including the needs and necessary measures to promote the protection, welfare and facilitation of persons with disabilities and eradicate discrimination, and foresees a daily broadcast of at least forty (40) seconds, in prime or average time zone. Any refusal to broadcast such social media messages is subject to sanctions.

60. Other legislative actions focusing on the accessibility of information and communication services include:

(a) Law 4339/2015, setting the framework for the licensing and operation of television content providers, lays down specific provisions that television broadcasters should apply to ensure the accessibility of broadcast content by persons with disabilities and especially hearing problems;

(b) Article 12 (8) of Law 4591/2019 implementing Directive (EU) 2016/2102 on the accessibility of websites and mobile applications of public sector bodies.

61. The competent Department of the Ministry of Administrative Reconstruction has created an e-Record of Public Websites and Applications, in which the websites and applications for mobile devices of public bodies falling within the scope of the law are registered. If the former comply with accessibility prerequisites, they are officially approved to the e-Record.

62. The issue of improving the communication of people with disabilities with the Greek Public Administration was put under public consultation procedure in April 2019.

63. The Procedures Department of the Ministry of Administrative Reconstruction is currently in the process of drafting a Ministerial Decision which will identify and specify the types of accessible means, forms and ways of communication of persons with disabilities with the public administration, taking into account the provisions of the abovementioned Law 4591/2019.

Situations of risk and humanitarian emergencies (art. 11)

Reply to paragraph 6 of the list of issues

64. In addition to what is mentioned *supra* (Question 2), asylum applicants with disabilities are examined by priority and benefit from special procedural guarantees, especially women and children with disabilities, as well as unaccompanied minors with disabilities. Moreover, according to Article 39 of Law 4375/2016, the Greek Asylum Service is continuously implementing training seminars for its personnel to enhance their expertise to identify rapidly asylum seekers in need of special protection and respond to their needs.

65. Enormous effort is being relentlessly devoted by the Hellenic Coast Guard (HCG) during emergency situations at sea, assigning priority to the protection of vulnerable individuals or groups, including women and children with disabilities.

66. For these purposes, the HCG prioritizes the training of its personnel deployed at the external sea borders in order to be able to identify persons who might be part of vulnerable groups or in need of international protection and refer them to the competent authorities.

67. Moreover, the HCG cooperates with the UNHCR in the context of a Memorandum of Understanding concluded in 2015, as well as with other healthcare providers and NGOs aiming to facilitate the access of vulnerable individuals and groups to necessary medical and legal services.

68. The GSGE has created a partnership between public stakeholders and NGOs to contribute to the needs of refugee women and their children, which led to the signing of a Protocol of Cooperation for the coordination of all competent entities for the identification, referral, accommodation and provision of counselling services to refugee women, victims or potential victims of violence and their children, with regard to their special needs (disability issues included). The provision of services to refugee women, victims or potential victims of violence and their children, is made through the National Network of

Structures for the Prevention and Combating of Violence Against Women (40 Counselling Centers, 21 Shelters, 24-hour SOS 15900 helpline). In addition, the GSGE has a long-term cooperation (Memorandum of Cooperation) and undertakes joint actions with the UNHCR.

69. In the context of the re-organization of the structure of the Ministry of Interior, the GSGE created a new Department of Social Protection and Combating Multiple Discrimination.

70. Moreover, the educational activities of the European Border and Coast Guard Agency (Frontex), as well as relevant activities at the national level, include subjects on the obligation of the personnel to ensure a friendly environment at the borders of the country for any person crossing the borders, including persons with disabilities, for whom special care should be applied, referring them, as the case may be, to other appropriate services and facilities.

Equal recognition before the law (art. 12)

Reply to paragraph 7 of the list of issues

71. The new draft law on involuntary psychiatric placement, in accordance with the Council of Europe Committee for the Prevention of Torture recommendations, provides for the following:

- Guarantees of independence, impartiality and objective medical expertise;
- Holding of hearings in psychiatric institutions (in order to ensure that patients benefit in practice from the right to be heard in person by the court during placement or appeal procedures);
- Providing patients in an appropriate way with full, clear and accurate information on their rights and on legal assistance;
- Free of charge legal assistance for patients who need it;
- Time limitations applied to provisional placement measures;
- A clearer legal basis for involuntary placement/treatment in private health care institutions;
- Safeguards against unnecessary involuntary placements.

Access to justice (art. 13)

Reply to paragraph 8 (a) of the list of issues

72. According to the information received, there are no cases of European Protection Order or European Arrest Warrant concerning persons who are blind or deaf.

Reply to paragraph 8 (b) of the list of issues

73. The National School of the Judiciary is organizing every year a 6-hour seminar on "The Protection of persons with disabilities".

Liberty and security of the person (art. 14)

Reply to paragraph 9 and 10 of the list of issues

74. Out of a total of 10,700 detainees, 316 are persons with disabilities (around 3%), 296 men and 20 women. In 10 out of 34 detention facilities, there are spaces accessible to persons with disabilities.

75. Data on involuntary psychiatric placement are as follows (Mental Health Atlas (2018):

<i>Type of Unit</i>	<i>Total number of placements</i>	<i>Involuntary placements</i>
III. Psychiatric Hospitals	8 791	4 199
III. Psychiatric Departments of General hospitals	12 697	4 135
III. Community Units (boarding houses etc.)	560	32
Total	22 048	8 366

Freedom from torture or cruel, inhuman or degrading treatment or punishment (art. 15)

Reply to paragraph 11 (b) of the list of issues

76. The Chief of the Hellenic Police issued on 29.06.2016 a Circular Order on *Protection-Care for Persons with Disabilities*”, which describes the responsibilities of police officers regarding the protection of the rights of persons with disabilities as well as the positive measures taken by the Hellenic Police to facilitate such persons in their dealings with the Police Services.

Reply to paragraph 11 (c) of the list of issues

77. The new draft law on involuntary psychiatric placement includes an article regarding transfers of patients to mental health units for assessment. The article stipulates that patients will be transferred by specially trained staff, in special vehicles, under conditions that absolutely ensure respect for the patient, while at the same time fulfilling the necessary safety requirements. The assistance of a policeman during the transfer can only be requested as an exception.

Freedom from exploitation, violence and abuse (art. 16)

Reply to paragraph 12 of the list of issues

78. The Greek legislation defines clearly the crime of trafficking in human beings and imposes severe penalties to perpetrators. The Greek Penal Code stipulates as aggravating circumstances the victimization of children and persons with physical or mental disabilities. Child sexual abuse and child pornography are prohibited by Law 4267/2014 (article 8), which transposed Directive 2011/93/EU into the National Legislative framework and led to certain amendments to the Penal Code.

79. Law 4478/2017, which transposed Directive 2012/29/EU, included many provisions for a more integrated protection scheme for crime victims with special needs, including victims with disabilities. Most importantly, Greece has put in place a formal National Referral Mechanism (NRM) for victims and presumed victims of human trafficking, launched on 1st January 2019. The NRM is supervised by the Office of the National Rapporteur (ONR) and run by the National Center for Social Solidarity (EKKA).

80. Laws 4538/2018 and 4540/2018 stipulate that unaccompanied minors may benefit from the national foster care system. Additionally, Law 4554/2018 foresees the establishment of a State Network of professional Guardians, providing case-specific support to this population and, thus, increasing their protection from any form of exploitation. Law 4540/2018 (transposing Directive 2013/33/EU) also laid down standards for the reception of applicants for international protection and defined that vulnerable groups, including victims of human trafficking, are eligible to receive special reception support. Moreover, it is set out that the competent authorities are obliged to report to the NRM any presumed victim of human trafficking.

81. In Greece, victims of human trafficking have free access to all medical and psychosocial services and also receive specialized services provided to victims of violence

(e.g. secure shelters, specialized psychosocial support, compensation, free legal aid, etc.). The Disease Control and Prevention Center (KEELPNO), Ministry of Health, applies a Vulnerability Assessment to all migrants and asylum seekers registered in First Reception and Identification Centers; among the vulnerability indicators, THB indicators are also included.

82. Minors in need for protection are accommodated either in typical child protection shelters, or in shelters provided by the National Centre for Social Solidarity and occasionally by specialized NGOs (such as A21, Praksis, Arsis, Smile of the Child). In those shelters, children receive specialized medical and psychosocial assistance, as well as legal aid.

83. A new National Action Plan 2019–2023 foresees the implementation of safe shelters specifically for women, boys and girls victims of human trafficking. The National Action Plan has taken into account the specific needs of children and women, including those with disabilities, who fall victims, or are especially vulnerable to human trafficking.

84. Presidential Decree 37/2019 provides for the establishment of a “Domestic Violence Division” at the Hellenic Police Headquarters which will have a coordinating role and will be responsible for the supervision and guidance of the regional Services, aiming at preventing and fighting domestic violence crimes. The establishment of “Domestic Violence Bureaus” is also in progress. At the same time, the Hellenic Police has proceeded to the establishment of 2 Departments and 12 Task Forces to combat trafficking in human beings, whose officers have received special training in dealing with victims and investigating cases of human trafficking.

Liberty of movement and nationality (art. 18)

Reply to paragraph 14 (a) of the list of issues

85. There is a referral system for persons with disabilities, as for all identified vulnerable applicants in all stages of asylum and immigration. See *supra*, Question 2.

Reply to paragraph 14 (b) of the list of issues

86. For the purposes of the Greek Asylum Service, persons with disabilities, according to the wider definition of disability, are included in three categories: (a) persons with disabilities or serious illness, (b) victims of trafficking, rape or other form of psychological, body or sexual violence or exploitation, (c) victims of trafficking.

87. In the reference period 07/06/2013–31/05/2019, 5.095 applicants fell under category A, of which 3,757 were men, while 1,338 were women. Moreover, for the same reference period, of the 1,334 applicants of category B, 952 were men and 382 were women. Finally, in the reference period 2016–2018, 8 applicants fall under category C, 1 man and 7 women. For all categories, 4.710 are men and 1727 are women.

88. Furthermore, 391 male and 291 female are under 18 years old. The biggest group belongs to applicants from 18–64 years old for all categories, 4,268 male and 1,372 female, while 51 male and 64 female are above 65 years old.

Reply to paragraph 14 (c) of the list of issues

89. The Greek Asylum Service collaborates with UNHCR, EASO, FRA and other European and international organizations, in order to improve training of personnel and case workers to identify and manage effectively asylum seekers with disability in all asylum stages, especially women, children and unaccompanied minors.

90. As far as nationality is concerned, Law 4604/2019 amended the Code of Greek Citizenship to facilitate participation in naturalization procedures and the acquisition of Greek citizenship by persons with disabilities, including children.

Living independently and being included in the community (art. 19)**Reply to paragraphs 15 and 16 of the list of issues**

91. According to a 2019 Ministerial Decision, and within the scope of de-institutionalization, Public Legal Entities and certified non-profit organizations for the provision of social care services may establish Supported Living Homes.

92. Regarding deinstitutionalization, the main challenge is shutting down/transforming the three remaining Psychiatric Hospitals. There are more than 500 community-based Mental Health Units (community Mental Health Centers, Day Centers, residential services), appr. 270 of them run by legal persons of public law and 250 run by legal persons of private law. There are plans for the development of about 220 new units (about 50 of which are sheltered apartments).

93. The Ministry of Health, aiming at the completion of deinstitutionalization and the promotion of the social integration of the chronic patients living in Psychiatric hospitals, has already issued all the relevant Ministerial decisions, launched the relevant call of tenders and in some cases even completed the procurement process for the following mental health services:

(a) Development of Psychosocial Rehabilitation Residential Units (Boarding Houses, Hostels, Sheltered Apartments);

(b) Development of specialized child psychiatric services (11 Mobile Mental Health Units and 10 Mental Health Centers);

(c) Development of Assertive Community Treatment Services and Home Care Services from the existing Day Care Centers, Mobile Mental Health Units and Mental Health Centers for people with mental disorders aiming to prevent, intervene promptly and prevent relapse of mental disease and to ensure the integration and continuity of psychiatric care.

94. In addition, the legislative framework regarding the organization and operation of Mental Health Centers and Community Based Mental Health Centers for Children and Adolescents has been updated.

Personal mobility (art. 20)**Reply to paragraph 17 of the list of issues**

95. According to a 2015 Ministerial Decision, terminal operators shall timely inform passengers with disabilities or reduced mobility in case of cancellation or late arrival or departure of a ship and for the provision of temporary mobility equipment in case of damage/loss thereof. Furthermore, Circulars issued in 2018 aim at raising awareness and ensuring appropriate training of the crew of passenger ships. Finally, the competent Ministry has provided to port authorities instructions for the training of their staff with respect to the applicable procedures for the provision of assistance to persons with disabilities or reduced mobility within Hellenic ports, in cooperation with the National Confederation of Persons with Disabilities (NCDP), the Hellenic Ports Association (ELIME) and other stakeholders.

96. Persons with disabilities are entitled to free use of public transport system. In Athens, 41.859 personalized cards (free pass) for persons with disabilities have been issued. There are more than 270 precast concrete platforms at bus and trolley stops. 1200 buses and trolleys are provided with kneeling system. Metro and tram lines are fully accessible. There is also a door-to-door service from Monday to Friday, between 7.30am and 2pm with three specially designed vans which take up to 7 people and three wheel chairs. This service is provided upon request to paraplegic and quadriplegic persons. In Thessaloniki, over 12000 free passes have been issued. Approximately 700 people use the designated van service (7,000–8,000 mov. per year).

97. In some suburban and intercity railway stations, an obstacle-free route is being ensured, together with safe crossing of blind people, toilets for people with disabilities and visual information.

98. Hellenic Railways (OSE) has obtained 27 boarding aids for wheelchairs to ensure accessibility from the platform level to the level of the train, of a total cost of 208.000 euro.

99. Greece has drawn up a National Implementation Plan for the Technical Specification for Interoperability relating to accessibility of the Union's rail system for persons with disabilities and persons with reduced mobility (Regulation 1300/2014) for a period of ten years, with an estimated cost of 5,000,000 €. In order to ensure accessibility of railway stations, OSE has included relevant actions in its Business Plan and has proposed the latter's integration in the Public Investment Program.

Freedom of expression and opinion, and access to information (art. 21)

Reply to paragraph 18 of the list of issues

100. According to Law 3699/2008, the Greek Sign Language is recognized as the first language of deaf and hard of hearing students and, in this respect, a bilingual approach to education is followed. Braille is recognized as the official written code of the blind students.

101. The certified knowledge of Braille and Greek Sign Language are a prerequisite for both teacher and Special Educational Personnel placement in Special Schools for the blind and deaf. Special provisions also apply to students in autism spectrum with or without speech.

102. The teaching of Greek Sign Language is included in the curriculum of deaf and hard of hearing students. Also, the teaching of Braille is included in the curriculum of blind students. For students in autism spectrum, modified forms of communication and forms of symbols-images are incorporated and applied in order to support their education.

103. The Institute of Educational Policy (IEP) is leading a European program (period of 2015–2020) named "Universal Design" to deliver school books in Accessible Digital Educational Material and easy to read form. Digital Educational Material for deaf and hard of hearing students has been delivered and continues to be developed for teaching GSL for Kindergarten and up to 4th grade of Primary School.

104. IEP also takes part to the project "Teaching European Sign Languages as a First Language".

105. During the 2018/19 school year, IEP has organized the Thematic Week for Secondary Schools on Democratic school community and human rights for all pupils. Questions on discrimination attitudes, prejudices and violent speech against pupils with disabilities have also been included.

Education (art. 24)

Reply to paragraph 19 of the list of issues

106. Special care is provided for the transportation of pupils to schools for pupils with special educational needs (SEN).

107. In accordance with article 155 of Law 4483/2017, the Regions may undertake the transportation of people with disabilities to and from their places of residence and the facilities of Certified Agencies within the National System of Social Care.

108. During the last three years (2016–2019), the Ministry of Education introduced the following legislation reforms and provisions:

109. Law 4547/2018 introduces a definition of inclusive education as an educational approach which takes into account the diversity of learners' needs and aims at overcoming barriers to learning, and ensuring equal access to learning, for all pupils, including those with disability and promotes it as the main target of the educational system.

110. More specifically, the Law reorganizes the supportive structures of primary and secondary education. In this context, the Law:

111. Introduces the Centers for Educational & Counselling Support (KESYs), whose role extends to counselling and career guidance, as well as supporting the psycho-social development and progress of all pupils with no exception, on the basis of special educational needs, disability or belonging to vulnerable social groups, giving priority to the identification of the institutional, and not just the individual, barriers to learning. There are currently 71 KESYs while more posts for educational and special education personnel have been created (1,118 in total), showing an increase of 67%;

112. Further promotes the transition of the special school to a Support Centre and the reorganization of the institutions of School Network of Educational Support (SDEY) and Interdisciplinary Educational Evaluation and Support Committee (EDEAY), which were renamed and reestablished with a more inclusive orientation and an interdisciplinary approach.

113. Introduces Regional Centers of Educational Planning (PEKESs) which advance education planning actions and promote the decentralization of the education system.

114. As regards the provisions of inclusive education in mainstream schools, several measures have been taken, including:

- The update of inclusion classes with Article 82 of Law 4368/2016, by redefining their objective as “the full inclusion of pupils with disabilities and/or special educational needs into the school setting”, which marks a transition from a previous pull-out model, criticized for reproducing discrimination inside the mainstream class.
- The determination of the number per class of pupils with disabilities and/or special educational needs who attend mainstream schools of general and vocational education.
- The establishment of co-educational programs which are implemented between special and mainstream schools, to develop the cognitive, learning, emotional and social skills of pupils with disability and/ or special educational needs as well as to sensitize the pupils of the mainstream schools on issues related to the respect of human rights, diversity and human dignity.
- The introduction of an institutional framework for the support of schools in primary and secondary education with the specialties of social workers and psychologists.

115. As regards the provisions for pupils attending Special Education School Units, the following legislative initiatives have been taken, to ensure the right of students to quality education:

- The establishment of a new type of school, the Unified Special Vocational Lower and Upper Secondary School (E.N.E.G.Y.L.) with new timetables and vocational sectors and professional rights.
- The introduction and implementation of apprenticeship for students with disability and/or special educational needs, who are graduates of ENEGYLSs.
- The establishment of the Special Nursery Schools and Special Primary Schools timetable with the compulsory 6-hour timetable operation and the option of All-day School operation in respect to mainstream nursery and primary schools.

116. Since 2017, the Directorate of Special Education has launched a systematic collection of statistics concerning pupils with disabilities and/or special educational needs who attend mainstream schools as part of the transnational action of statistics collection on inclusive education, organized by the European Agency for Special Needs & Inclusive Education, in which Greece is an active member.

117. During the last years, 40 new special schools in primary and secondary education and 7 more special schools have been established or are currently being established. Furthermore, 570 inclusion classes (within mainstream Primary and Secondary education school Units) were established, while more classes are planned to be created. In 2018/19,

the number of personnel appointments at special school units, inclusion classes and the rest of the support structures reached 15,838, more than double than the number of appointments in 2014/15. In addition, in order to cover the large number of teacher vacancies in special education, the recruitment of permanent staff was programmed and entered in the regular budget of 2019. At the moment, a respective recruitment competition is under way for the appointment of 4,500 persons.

118. The Strategic Structure – Education Sector is implementing discrete actions (2018–2019) under the operational programme “Human Resources Development, Education and Life Long Learning” which are funded by the European Common Fund and the Greek Government (2014–2020). In particular, the actions currently being implemented are the following:

- “Specialised educational support for the inclusion of pupils with disabilities and/or special educational needs for the school years 2018/19, 2019/20, 2020/21”.
- “Individualized Support Programs for pupils with disabilities and/or special educational needs for the school year 2018/19”.
- “Specialized Support Programs for the inclusion of pupils with disabilities and/or special educational needs for the school year 2018/19”.
- “Empowerment of the Educational Support Structures for the school year 2018/2019”.
- “Training the Coordinators of Pedagogical Task of P.E.K.E.S.” (see *supra*).

119. Furthermore, in an effort to promote inclusive education, the Directorate of Special Education implements the following actions:

- Planning and Developing a Website for Special and Inclusive Education;
- Organizing events to disseminate good practices in the field of inclusive education;
- Active participation in projects organized by the European Agency for Special Needs & Inclusive Education;
- Participation in the European project “Enhancing inclusion capacity of educational organizations/institutions providing VET with information and communication technologies (ICT) – EICON”;
- Participation in requesting technical support from the Structural Reform Support Service (SRSS) of the European Commission under Regulation (EU) 2017/825 on the establishment of the Structural Reform Support Program;
- Continuous cooperation with independent authorities, NGOs and other relevant stakeholders.

120. The enrolment rates of students with disability and/or special educational needs in mainstream schools is increasing, as it is indicated in the table annexed to this document.

121. Currently, the Directorate of Special Education has no data concerning people with disabilities and/or special educational needs who do not attend or have dropped out from school, or pupils with disabilities from diverse ethnic background attending mainstream schools. Collecting such data is expected to be conducted in the immediate future.

122. Furthermore, a Joint Decision of the Ministers of Finance, Interior, Education & Religious Affairs and Transports determines the conditions and the details concerning the free transportation of pupils attending public schools of primary and secondary education, which is provided under the responsibility of the Regional authorities. See also *supra*.

Health (art. 25)

Reply to paragraph 20 (a) of the list of issues

123. Law 4486/2017 on the “Reform of Primary Health Care, emergency health care regulations and other provisions by the Ministry of Health” is one of the basic pillars which redefined the framework for the provision of Primary Health Care Services to the entire

population, with special care for vulnerable social groups. The family doctor has been assigned a critical role to this effect. The Law established the procedures for the organization and development of programs, actions, interventions and collaborations, including in the fields of prevention and health promotion, also with regard to vulnerable social groups, at national and regional level. A significant number of local health groups have been set up throughout the country to support the projects provided by public primary care provision services and decentralized units.

Reply to paragraph 20 (b) of the list of issues

124. The payment of allowances to people with disabilities by municipalities (Article 94 of Law 3825/2010, “Kallikratis Programme”) is no longer in force. This task has been assigned since 1.1.2019 to the Organization of Welfare Benefits and Social Solidarity (within the Ministry of Labor). Municipalities can make any decision related to any other similar action or initiative of local character aimed at achieving the provision of support and protection to persons with disabilities.

Reply to paragraph 20 (c) of the list of issues

125. In the context of the development of Family Planning Facilities and Services at national level, information, counselling, health care, sexual and reproductive health-related services are provided to women, men and couples, including those with disabilities. Also, information campaigns/days are organized in the context of associations and disability organizations. Since 2018, “awareness raising and sensitization” activities for the student population are being developed at schools in the field of “sexual and reproductive health”, addressed, inter alia, to students with disabilities.

Reply to paragraph 20 (d) of the list of issues

126. The Ministry of Health is developing, in cooperation with scientific bodies, public health services and social actors of the local community the “National Pilot Program for the Prevention and Promotion of Health of the Elderly People – IPIONE”. This program is conducted with a different health-related theme every year. In 2019, the program entitled: “Prevention and Management of Sensory Disorders-Vision and Hearing” is being implemented. In this context, and on a case-by-case basis, interventions of secondary prevention and incident management are performed with personalized actions, depending on the state of health, the chronic state of the disorder or the disability, in order to achieve the functional improvement of those concerned.

Habilitation and rehabilitation (art. 26)

Reply to paragraphs 21 and 22 of the list of issues

127. The total number of persons with disabilities receiving services from the New Social Welfare Centers is 2.262 individuals of both sexes, all ages and with several types of disability. Their revenue derives from a State grant, the health expenditure from the National Organization for the Provision of Health Services, the State lottery ticket and donations. It should be noted that children are hosted and cared for in separate facilities.

128. The National Institute for the Deaf People and the Centre for Education and Rehabilitation for the Blind implement early intervention programs and programs for rehabilitation and social inclusion for persons with hearing and vision disabilities.

Work and employment (art. 27)

Reply to paragraph 23 of the list of issues

129. Article 3 of Law 2643/1998, as amended by Law 4611/2019, provides that 5% of the total job vacancies to be announced by any public enterprise, public law entity, local government organization and legal entity of private law that hire personnel through the Supreme Council for Civil Personnel Selection shall be reserved for persons protected by Law 2643/1998 (including persons with disabilities and relatives of persons with

disabilities). So far, about 7,500 jobs in total have been announced for all categories of protected persons. About 2,600 persons with disabilities and about 850 relatives of persons with disabilities have been placed in jobs in accordance with the Law.

130. Law 2643/98 also affords special protection with regard to the dismissal of persons with disabilities.

131. In addition, and in order to provide employment to special groups of unemployed persons and persons with disabilities in the private sector, the Ministry of Labor, in cooperation with the Hellenic Manpower Organization, implements programs that aim at the creation of new work positions through the funding of enterprises and employers in order to employ, inter alia, unemployed persons with disabilities, as well as through subsidies for the ergonomic arrangement of the workplace for persons with disabilities. So far, the Hellenic Manpower Organization has received 790 applications, for the implementation of this program, out of which 523 have been approved and 386 positions have been covered.

132. Furthermore, ensuring access to persons with disabilities is a requirement for admitting licensed Life-long Learning Centers into the register of “training providers”, in the context of relevant programs under the National Strategic Reference Framework.

133. All the above mentioned vacancy notices must necessarily include in the obligations of the training providers that care should be taken in case of participation of persons with disabilities with regard to the accessibility of the educational material. There is also an express reference to the relevant expenses as part of the cost covered by the training order.

134. All the public notices for community service programs and the 2/2016 notice for “Training and certification of unemployed persons of 29–64 years in state-of-the-art fields” provide as criteria for the allocation of credit points the existence of a disability percentage higher than 50% and the existence of protected children of persons with disabilities, both minor and adult, with a disability percentage higher than 67%.

135. Finally, in the context of the upcoming planning of active policies for employment, as described in the Strategic Plan, there is an ongoing cooperation with ESAMEA (National Federation of Persons with Disabilities) for the planning of actions for integration in employment of young persons with disabilities, covering an estimated number of 3,000 beneficiaries.

136. As far as Social and Solidarity Economy is concerned, provision is made for the equal participation in the social and economic life of persons that belong to vulnerable population groups, including persons with disabilities of any form (physical, mental, sensory, and intellectual). Law 4430/2016 sets out in detail the terms and conditions for the purpose of achieving this goal.

137. The Civil Service Code contains provisions on special leave for employees with a disability percentage of fifty per cent (50%) and over, as well as for those who have a spouse or a child suffering from a disease requiring regular blood transfusions or requiring periodic hospitalization or those who have children suffering from severe mental deprivation or Down syndrome, as well as to employees with children suffering from Diffuse Developmental Disorder (DDD) if they are minors or are adults but do not work.

138. Other measures include, for certain categories, the reduction of working hours.

139. Finally, a 2019 Circular clarified that the above mentioned special leave with pay of up to 22 working days per year, as well as the reduction of the working hours by one hour per day constitute independent rights of the parent-employee for each family member who satisfies the requirements of the relevant provisions.

140. Other recent legislative measures include:

- The coverage of 10% of the positions of regular staff and staff with a contract by persons with disabilities of at least 50% and 5% of the posts by relatives of persons with disabilities of 67% or more; deaf and hard of hearing persons are exempt from the requirement to prove foreign language knowledge.

- Definition of braille certified language knowledge and certified knowledge of the hellenic sign Language as a necessary qualification to cover specific Citizen Service Centers (KEP) positions.

141. Measures have also been taken in the fields of (a) postings or transfers in the context of the Unified Mobility System in the Public Administration, (b) registration in the Register of Executives of the Public Administration, (c) ergonomic workplace arrangements and (d) local government organizations.

142. There are 30 Social Cooperatives, 8 of which have been developed during the period 2016–2018. A joint ministerial decision is under way regarding the funding of Social Cooperatives through the Ministry’s budget.

Adequate standard of living and social protection (art. 28)

Reply to paragraph 24 of the list of issues

143. The amount of hospital charges in Supported Living Homes covered by Social Security ranges from 40 to 70 Euro depending on the severity of disability. The Ministry of Labor is currently preparing a Ministerial Decision on the coverage of uninsured persons with disabilities residing in Supported Living Homes.

144. The Directorate of Policies for Persons with Disabilities has conducted and is supervising the implementation of 9 Financial Support Programs. The amounts paid within the scope of these Programs have not been decreased despite the difficult fiscal circumstances. Moreover, persons with disabilities and economically weak persons have been released from the obligation to pay fees for examination at the Disability Certification Centers (KEPA). The above benefits are also allocated to refugees and third country nationals legally staying in the country.

145. Moreover, with a view to alleviating the impact of the economic crisis, a 2018 Circular provided that persons with disabilities, who cannot receive a pension due to unpaid contributions to their insurance fund, will be included in the Financial Support Programs for Persons with Disabilities.

146. In addition, in the context of the simplification of administrative procedures and promotion of electronic governance, a pilot program was initiated in February on the implementation of a process for the payment of benefits to persons with disabilities.

147. Since 1.1.2019, the Organization of Welfare Benefits and Social Solidarity (OPEKA) was assigned the task, as a single administrative agency, to allocate welfare and social solidarity benefits to persons with disabilities in the entire country, in order to provide better services to all beneficiaries.

148. In addition, the Ministry implements every year a Camping Program for Persons with Disabilities in cooperation with the Panhellenic Federation of Parents and Guardians of Persons with Disabilities (POSGKAmE). The program includes approximately 3,000 beneficiaries and their accompanying persons.

149. As far as the programs “Social Solidarity Income” and “Housing Allowance”, are concerned, the declared income of each household does not include the non-contributory disability allowances allocated by the state, which are not taken into account for the assessment of the income thresholds for the granting of the abovementioned allowances.

150. Favorable provisions are applied to persons with disabilities with regard to the concession of the right to use kiosks. Furthermore, the municipal council may decide the reduction in, or the exemption from, municipal taxes or fees of, *inter alia*, persons with disabilities.

151. The legislation on first- and second tier of local government contains provisions on providing care and support to vulnerable social groups, including persons with disabilities. Furthermore, the remuneration of elected persons with disabilities is increased by 20%, while it is possible to recruit a special secretary – assistant to enable a blind Deputy Mayor to exercise his or her tasks.

Participation in political and public life (art. 29)**Reply to paragraph 25 of the list of issues**

152. The Greek state is taking all necessary steps to enable the participation of voters with disabilities in the electoral process. Recently, in view of the local government elections and the elections of the members of the European Parliament on May 26, 2019, the Directorate of Elections of the Ministry of Interior issued a Circular so that citizens with disabilities be facilitated in the exercise of their right to vote.

C. Specific obligations (arts. 31–33)**Statistics and data collection (art. 31)****Reply to paragraph 26 of the list of issues**

153. In cooperation with the Hellenic Statistical Authority, it has been determined that:

(a) The first formal statistical data on disability will be collected through the nationwide Health Survey that is carried out every five years and is based on Eurostat's questionnaires, adjusted to meet the country's demands and needs. For 2019, an ad hoc questionnaire on disability is added to the survey. The Co-ordination Mechanism for Disability is part of the Health Survey working group;

(b) The collection of data on disability alongside the 2021 census is under consideration. There are ongoing discussions with the Hellenic Data Protection Authority on ways to ensure respect for data protection legislation.

International cooperation (art. 32)**Reply to paragraph 27 of the list of issues**

154. The strengthening of the rights of persons with disabilities has been included among the key thematic actions which are directly related to the successful implementation of the SDGs. Among the main policies and measures for the implementation of the 2030 Agenda for Sustainable Development the following have been included:

(a) Fostering the implementation of inclusive education and training at all levels, also with regard to persons with disabilities (SDG 4, Target 4.5);

(b) Building effective institutions and strengthening transparency – The Greek Ombudsman as a mechanism for the promotion of the implementation of the CRPD (sdgs 16, Target 16.3);

(c) Achieving Gender Equality, also in respect of women facing multiple discrimination, including women with disabilities (SDG 5, Target 5.1).

National implementation and monitoring (art. 33)**Reply to paragraph 28 of the list of issues**

155. According to articles 59–72 of Law 4488/2017, co-ordination for and monitoring of the implementation of the Convention has been assigned to (a) the Co-ordination Mechanism within Government, (b) the General Secretariat for Transparency and Human Rights and (c) the Greek Ombudsman and is organized as follows:

Co-ordination Mechanism for the rights of Persons with Disabilities (Article 69)

156. It is established and operates within the Ministerial office of the Greek Minister of State, thus fulfilling the requirement of Article 33.1 of the Convention for the designation of a co-ordination mechanism within government.

157. The Co-ordination Mechanism is responsible for: (a) monitoring issues that regard the rights of persons with disabilities, (b) coordinating the competent Ministries' actions

that are related to drawing up and implementing policies for persons with disabilities, (c) working closely with the Central Focal Point of Article 70 (i.e. General Secretariat for Human Rights) for the implementation of the Convention, (d) monitoring the competent Ministries' actions for safeguarding the implementation of the Convention in the private sector and (e) any other responsibilities on the basis of the Convention and its Optional Protocol.

158. Three staff members of University level (2 Postgrad) are employed at the Co-ordination Mechanism. No extra budgetary resources have been required for its establishment and operation.

General Secretariat for Human Rights of the Ministry of Justice, Transparency and Human Rights (Article 70)

159. It serves as the Central Focal Point of Article 33.1 of the Convention. Its responsibilities include: (a) receiving and processing/ handling reports on issues that fall within the scope of the Convention at central, local or regional level, (b) working closely with the "individual focal points" on disability related issues, (c) interconnecting with the Framework of Article 72 (i.e. the Greek Ombudsman); (d) conducting consultations with disability bodies and organizations' representatives and stakeholders, (e) providing appropriate information and guidance on the rights of persons with disabilities, (f) preparing and submitting to the Greek Parliament (i) the National Action Plan for persons with disabilities as well as (ii) Reports on disability issues that are required by Article 35 of the Convention.

Individual Focal Points (Article 71)

160. These are set at Ministerial, Regional and Municipal level. They interoperate with the Central Focal Point and are competent for monitoring and safeguarding the implementation of public policies within their purview, that fall under the Convention's scope. They also have the responsibility to propose new policies and to promote public consultation.

The Greek Ombudsman (Article 72)

161. It is an Independent Authority, designated as the Framework for Promotion of the Convention (Article 33 (2) CRPD). Its responsibilities include: (a) expressing an opinion on the compatibility of legislation and public policies with the Convention; (b) handling complaints alleging violations of the rights of persons with disabilities, (c) carrying out awareness-raising actions on disability issues, (d) carrying out studies on the implementation of the Convention in specific sectors, (e) submitting an annual report that includes an overall assessment of current policies and their implementation, comments on omissions and deficiencies and new legislative proposals.

162. The Co-ordination Mechanism has been operational since August 2018. Its main actions and accomplishments up to May 2019 have been the following:

- Individual Focal Points have been designated in all Ministries, Regions and Municipalities;
- The Co-ordination Mechanism has actively contributed to:
 - The issuance of Joint Ministerial Decision 3586/2018 of the Minister and Deputy Minister of Digital Policy, Telecommunications and Media on the improvement of access of persons with disabilities to the media (news, important announcements and entertainment/educational programmes), as provided for in Article 67 of Law 4488/2017;
 - The sending of a letter by which the Secretary General of the Ministry of Administrative Reconstruction, asks the National Centre for Public Administration and Local Government (EKDDA) to increase in its programmes the number of educational and training seminars on issues of disability (under the provisions of Article 66 of Law 4488/2017);

- The preparation, with the use of a primary consultation process (electronic consultation before preparing a draft law), of a Ministerial Decision that will determine the ways (including the use of the Greek Braille Format and the Greek sign language) in which the Code of Administrative Procedures can be adjusted to the needs of persons with disabilities (Article 65 of Law 4488/2019). The Ministerial Decision is currently at the drafting stage.
 - All meetings arranged at a Ministerial level have been targeted towards preparing secondary legislation under Law 4488/2017. Issues such as the establishment of post-school structures for lifelong professional training and provision of work to persons with disabilities (Article 28 of the Convention) or the establishment of a University Department of Disability Studies are being examined;
 - The Co-Ordination Mechanism has taken actions to increase public awareness on disability issues. To this purpose it has organized two major successful events on Disability and Mental Health, with the aim to raise awareness on the social model of disability, to bring together persons with various disabilities and their representatives and gather opinions and proposals on new practices and policies.
-