

HELLENIC REPUBLIC

GREEK NATIONAL COMMISSION FOR HUMAN RIGHTS

Neofytou Vamva, GR 106 74 Athens, Greece, Tel: +30 210 7233221-2; Fax: +30 210 7233217;



Contribution by

the Greek National Commission for Human Rights (GNCHR)

**to the Committee on the Rights of Persons with Disabilities
(CRPD) of the United Nations**

**in the framework of the CRPD 21st session and 11th pre-session
(11 March – 11 April, Geneva)**

in relation to

**the implementation of the Convention on the Rights of Persons with Disabilities in the
State party**

1st March 2019

The Greek National Commission for Human Rights (GNCHR) is the independent advisory body to the Greek State on matters pertaining to human rights protection. It was established by Law 2667/1998 in accordance with the UN Paris Principles. Thirty-two institutions whose activities cover the field of human rights are currently represented in the GNCHR (independent authorities, departments of university-level educational institutions, workers' and disabled persons' confederations, NGOs, political parties and ministries).

The Greek National Commission for Human Rights (hereinafter GNCHR) warmly welcomes the upcoming 21st session and 11th pre-session of the Committee on the Rights of Persons with Disabilities (CRPD) and its request for submitting a Written Contribution of *A status* NHRIs on different aspects concerning the implementation of the Convention on the Rights of Persons with Disabilities in the State party in view of the forthcoming 11th Pre-session of the Working Group of the Committee on the Rights of Persons with Disabilities (11 March – 11 April, Geneva) and would be more than willing to submit its written observations.

The GNCHR, which was established by Law 2667/1998 in accordance with the Principles relating to the Status of National Institutions (The Paris Principles) and is accredited with *A-status* by the Sub-Committee on Accreditation (SCA) of the Global Alliance of National Human Rights Institutions (GANHRI), is the independent advisory body to the State on matters pertaining to human rights protection. The GNCHR mandate covers the whole spectrum of human rights in terms of *ratione materiae* and, since its establishment, the GNCHR has dealt with a broad range of human rights issues, including those concerning the most vulnerable groups, such as children, physically and mentally disabled persons, asylum seekers, refugees or migrants. Therefore, taking into account that safeguarding the rights of persons with disabilities has always been among the GNCHR priorities, the GNCHR has previously been extensively concerned with the need for institutional and effective protection to the particularly vulnerable social group of persons with disabilities, formulating, thus, proposals and recommendations.

To that end, the GNCHR, taking into account the findings in the Alternative Report Greece 2019 on “Human Rights and Persons with Disabilities” of the National Confederation of Disabled People (NCPD)¹, endorses the conclusions and recommendations of the Report and is willing to be committed to the complete guarantee of the rights of the disabled persons. In particular, the GNCHR recognizes the role and the necessity of the mission of the NCPD, as an independent mechanism

¹ NCPD is an umbrella organization representing the disability movement of Greece. It is a non-profit legal entity founded and established in 1989 by organizations of people with disabilities and their families. Its mission is to protect the interests of persons with disabilities, promote their rights and monitor the law and policy-making of the Greek State on issues concerning themselves and their families. The NCPD actively participates and is involved in the decision-making process at all levels of the organization of the Greek State. A representative of the NCPD participates with voting right in the GNCHR.

of civil society, to protect the rights of the disabled persons and considers that the Report deals fairly satisfactory with all aspects relating to the protection of the rights of the persons with disabilities.

Furthermore, you will find, for your convenience, some of the GNCHR reports and material dealing with **on the Rights of Persons with Disabilities** on the GNCHR website:

- GNCHR Observations on the National Action Plan on Children's Rights 2018-2020 (29.11.2018) [in Greek]
http://www.nchr.gr/images/pdf/apofaseis/paidia/paratiriseis_EEDA_ESSDP.pdf
- Ensuring the timely start of the school year 2017-2018 regarding children with disabilities and/or special educational needs [Statement](#) (5.7.2017) [in Greek]
- GNCHR [Statement](#): Ensuring the timely start of the school year for children with disabilities and/or special educational needs (22.7.2016) [in Greek]
- Child protection is not a luxury! - The GNCHR [adopts](#) the Principles on Child Protection in Greece (June 2016) [in Greek]
- HRC 31, [Written Submission](#) by the Greek National Commission for Human Rights Article 11 of the Convention on the Rights of Persons with Disabilities on situations of risk and humanitarian emergencies, A/HRC/31/NI/9 (24.2.2016)
- [Protection of the rights of older persons](#) (20.11.2014)
- [International Convention on the Rights of Persons with Disabilities: Problems regarding its implementation](#) (9.10.2014)
- ICC: First Meeting between the CRPD Committee and NHRIs Greek National Commission for Human Rights [Oral statement](#) (23.9.2014)
- [Recommendations](#) on the Bill on Special Education (10.7.2014)
- [Recommendations](#) of the National Commission for Human Rights (NCHR) for Childhood Protection: «Health and Welfare» (2014)
- GNCHR [Comments regarding Law 3304/2005](#) on “Implementation of the principle of equal treatment irrespective of racial or ethnic origin, religious or other

beliefs, disability, age or sexual orientation”, 18.2.2010 (Questions 1 and 3 of the Questionnaire)

- [Proposals](#) regarding the implementation of Law 3699/2008 Special Education of Persons with Disabilities or Special Educational Needs (9.4.2009)

Subsequently, with respect to the above mentioned contribution, the GNCHR would like to focus on specific areas regarding the implementation of CRPD in Greece by highlight the shortcomings and gaps in the existing legislation, in the following points of concern:

Art. 7: Children with Disabilities

The GNCHR stresses in its Recommendations for Childhood Protection: «Health and Welfare», the importance of the implementation of Article 7 of the CRPD, which provides that States should ensure full enjoyment by children with disabilities of all human rights and fundamental freedoms on an equal basis with other children².

In this regard, and in view of the economic crisis and the austerity-driven measures and policies that the Greek government has enacted and implemented since 2010, including their consequences to the children with disabilities³, the GNCHR raises serious concerns for the impact of economic factors on the outbreak of discrimination on multiple levels and the sharp decline in social rights, such as the right to health and social security of children with disabilities and special needs.

Moreover, the GNCHR has pointed out the need to elaborate a National Strategy with specific axes relating to the protection of childhood and a child focused fiscal policy, meanwhile ensuring the participation of the Greek Ombudsman due to his role as the independent mechanism for the implementation of the CRPD and all relevant stakeholders⁴.

Suggested Question:

² GNCHR [Childhood protection: Health and Welfare](#)

³ GNCHR [Written Submission](#) by the Greek National Commission for Human Rights Article 11 of the Convention on the Rights of Persons with Disabilities on situations of risk and humanitarian emergencies, A/HRC/31/NI/9 (24.2.2016)

⁴ GNCHR Observations on the National Action Plan on Children's Rights 2018-2020 (29.11.2018) [in Greek], available at: http://www.nchr.gr/images/pdf/apofaseis/paidia/paratiriseis_EEDA_ESSDP.pdf, p. 84-85

Does the Greek State have the intention of structuring a clearly-defined national strategy towards childhood protection and child rights mainstreaming across all policy levels involved and if yes, which measures is going to take for the implementation of a National Plan for Childhood?

Art. 11: Situations of risk and humanitarian emergencies⁵

The GNCHR is particularly concerned with the implementation of Article 11 of the CRPD in Greece, especially under the impact of all austerity measures that have finally led to a humanitarian emergency threatening the protection of the rights of persons with disabilities living within the Greek territory. In this regard, the GNCHR observes with deep concern the continuous refugee and migration crisis and its impact on the most vulnerable group, namely refugees and migrants with disabilities⁶.

The GNCHR notes that the already insufficient structures in the Greek territory cannot provide persons with disabilities the care to which they are entitled to and it is often civil society organizations which assist to this end. The deficiencies regarding the access to social protection and social assistance are of crucial importance also for refugees and asylum-seekers with disabilities.

Moreover, the implementation of the existing legislative framework on Asylum and First Reception matters including the protection of migrants, refugees and asylum seekers with disabilities remains in practice a big challenge⁷. Indeed, crucial structures such as the First Reception Service and the new Asylum System are of great need of human, economic and material resources.

In this context, the implementation of Article 11 CRPD requires the commitment of all parties involved, the Greek State along with the UN, the EU, the EU member states

⁵ See footnote 3 and GNCHR Annual Report 2016, available at:

http://www.nchr.gr/images/English_Site/Ektheseis/GNCHR%20Annual%20Report%202016.pdf

⁶ GNCHR, “Protection of the rights of older persons”, 20.11.2014, available at: http://www.nchr.gr/images/English_Site/GNCHR_older_persons.pdf;

GNCHR, “International Convention on the Rights of Persons with Disabilities: Problems regarding its implementation”, 9.10.2014, available under:

http://www.nchr.gr/images/English_Site/Problems_%20Ratification_Implementation_ICRPD.pdf;

“ICC: First Meeting between the CRPD Committee and NHRIs: Greek National Commission for Human Rights Oral statement”, 23.9.2014, available at:

http://www.nchr.gr/images/English_Site/oral%20statement%20CRPD.pdf;

GNCHR, “Recommendations on the Bill on Special Education”, 10.7.2014, available at: http://www.nchr.gr/images/English_Site/PAIDIA/GNCHR_special_education.pdf.

⁷ See the website of the NGCHR: <http://www.nchr.gr/index.php/en/2013-04-03-10-23-48/2013-04-03-10-43-00>

and the European institutions. There is an urgent need for the best possible management of the ever increasing migration flows, with respect for human life and dignity, both in the EU as well as the countries of origin.

Suggested Questions:

- What implementation measures is the Greek government willing to take in order to render public or private facilities and services accessible to persons with disabilities, as required by the Convention?
- Under the current circumstances and given the fact that the identification of migrants, refugees and asylum seekers with disabilities is *per se* considered to be a major problem, what are the necessary measures that the Greek government is prepared to take in order to identify migrants, refugees and asylum seekers with disabilities, as an indispensable prerequisite for their subsequent protection as required by the CRPD?

Article 24: Education

The GNCHR, as a part of the international institutional framework for the protection of human rights, gives special attention to the following aspects as being of high priority in the field of children's rights: **a)** the economic and social consequences of the debt crisis and the fiscal measures (on human and social rights), **b)** the disproportionate impact of the refugee crisis (unaccompanied minors, living conditions in reception centers) and **c)** the impact of policy measures on the fundamental rights of children, especially regarding vulnerable groups, such as disabled children and children with chronic diseases⁸. In this context, the GNCHR is following with particular attention two high priorities: the protection of childhood and the promotion of the rights of persons with disabilities and/or special educational needs⁹. In view of its priorities, the GNCHR has repeatedly expressed its deep

⁸ GNCHR Annual [Report](#) 2016, p. 21, GNCHR Observations on the National Action Plan on Children's Rights 2018-2020 (29.11.2018) [in Greek],

http://www.nchr.gr/images/pdf/apofaseis/paidia/paratiriseis_EEDA_ESSDP.pdf, p. 3-4

⁹ GNCHR Observations on the National Action Plan on Children's Rights 2018-2020 (29.11.2018) [in Greek], http://www.nchr.gr/images/pdf/apofaseis/paidia/paratiriseis_EEDA_ESSDP.pdf, p.35, Child protection is not a luxury! - The GNCHR [adopts](#) the Principles on Child Protection in Greece (June 2016) [in Greek], the GNCHR [Recommendations](#) on the Bill on Special Education (10.7.2014),

concern regarding the lack of implementation of the CRPD relating to the special education for children with disabilities as well as the importance of the timely start of the school year for children with disabilities and/or special educational needs.¹⁰ Specifically, the GNCHR focuses on the chronic problems observed in the education of children with disabilities, such as the recruitment of substitute teachers rather than permanent educational specialized personnel, the significant delay of the school year and the lack of parallel support personnel, as well as the effective access of persons with special educational needs to inclusive education¹¹.

In fact, there is an absence of a clear legal framework, as specific issues are not directly regulated by the legislator, yet practically the existing legislation provides for the issuing of various legal acts (presidential decrees, ministerial decisions) regarding the implementation of the law¹² which, combined with legal uncertainty, affects the rights of children with disabilities.

It should also be also noted, that the GNCHR constantly voices its concern for the impact of austerity measures on the outbreak of discrimination on multiple levels and the sharp decline in the social rights sector. In this context, the GNCHR draws attention to the imperative need for a continuous assessment, in consultation with the relevant stakeholders, of the impact of the austerity measures on human rights protection.¹³

In relation to the above, the GNCHR avails itself of the opportunity to remind its position with regard to the necessity of interoperability between all competent State authorities for the effective monitoring of the rights of persons with disabilities across

[Proposals](#) regarding the implementation of Law 3699/2008 Special Education of Persons with Disabilities or Special Educational Needs (9.4.2009)

¹⁰ See Footnote 4, p. 35 and GNCHR Annual [Report](#) 2016, p. 45.

¹¹ GNCHR Observations on the National Action Plan on Children's Rights 2018-2020 (29.11.2018) [in Greek], http://www.nchr.gr/images/pdf/apofaseis/paidia/paratiriseis_EEDA_ESSDP.pdf, pp. 35, 43, 46.

¹² Law 3699/2008 “*Special Education of Persons with Disabilities or Special Educational Needs*” (OGG 199/A 2.10.2008), Law 4452/2017 “*Regulation of Language Certificate-National Library of Greece and other provisions*” (OGG 17/A, 15.2.17), Law 4547/2018 “*Reorganisation of the structures of primary and secondary education and other provisions*” (OGG 102/A, 12.6.2018).

¹³ GNCHR Observations on the National Action Plan on Children's Rights 2018-2020 (29.11.2018) [in Greek], http://www.nchr.gr/images/pdf/apofaseis/paidia/paratiriseis_EEDA_ESSDP.pdf, pp. 43,46,76, GNCHR, Statement on the impact of the continuing austerity measures on human rights, 15.7.2015, available at

http://www.nchr.gr/images/English_Site/CRISIS/GNCHR_Statement_%20impact_of_austerity_measures_on_HR_2015_.pdf and GNCHR [Written Submission](#) by the Greek National Commission for Human Rights Article 11 of the Convention on the Rights of Persons with Disabilities on situations of risk and humanitarian emergencies, A/HRC/31/NI/9 (24.2.2016)

the board¹⁴. Thus, in the framework of activating the independent mechanism for the implementation of the CRPD,¹⁵ and enabling the Greek Ombudsman in cooperation with the National Confederation of Disabled People (NCDP) to protect and monitor the present Convention, as required by Art. 33 (2) of the CRPD, the GNCHR highlights the importance of the effective implementation of the requirements referred to in Art. 24 of the present Convention.

Suggested questions:

- Does the Greek State intend to promulgate legislative provisions enabling administrative authorities to take measures, so as to achieve full conformity with Article 24 of the present Convention?
- In particular, how does the Greek State plans to concretely address the issue of effective access to free inclusive and special education for all persons with disabilities and special educational needs of all ages and at all stages and educational levels?
- How does the Greek State deploy the contribution of the independent monitoring mechanism regarding the special education for children with disabilities according to Art. 24 of the CRPD?

Article 33: National Implementation and Monitoring

The GNCHR notes the fact that organizations representing children with disabilities have not been involved in the "National Mechanism for Monitoring and Evaluation of the National Action Plan on the Rights of the Child", does not met/fulfill : **a)** the requirement of Art. 4 (3) of the CRPD, according to which *“In the development and implementation of legislation and policies to implement the present Convention, and in other decision-making processes concerning issues relating to persons with disabilities, States Parties shall closely consult with and actively involve persons with disabilities, including children with disabilities, through their representative*

¹⁴ See Annual Report 2016 <http://www.nchr.gr/images/ekthesi2016.pdf>, p. 233 (the Abstract in English)

¹⁵ Art. 72 of Law 4488/2017 *“Public sector pensions and other social security matters, strengthening the protection of workers, rights of persons with disabilities and other provisions”* (OGG 137/A, 13.9.2017).

organizations” and **b**) the requirement of Art. 7 (1) of the CRPD, according to which “States Parties shall take all necessary measures to ensure the full enjoyment by children with disabilities of all human rights and fundamental freedoms on an equal basis with other children”. The involvement of a representative body of children in the procedure is going to serve more effectively the purpose of protecting this particular vulnerable group.

Therefore, the GNCHR recommends the amendment of national legislation (Law 4491/2017 “*Legal gender recognition- National Mechanism for Monitoring and Evaluation of the Action Plan on the Rights of the Child and other provisions*” (OGG 152/A 13.10.2017)) in order to include in the National Mechanism also the Panhellenic Federation of Parents and Guardians of Disabled People (POSGAMEA)¹⁶, for the proper implementation of the CRPD.

Moreover, the GNCHR emphasizes the added value of achieving synergies among the *National Action Plan on the Rights of the Child* and the *National Action Plan on the Rights of Person with Disabilities*, which will be drawn up in the framework of the coordination mechanism within government, following Art. 33 (1) of the CRPD. The General Secretary of Transparency and Human Rights under the Ministry of Justice, Transparency and Human Rights is assigned as a focal point, by Law 4488/2017¹⁷.

Suggested questions:

- How does the Greek State intend to implement Articles 4 (3) and 7 (1) of the CRPD regarding the obligation of the State to closely consult with and actively involve persons with disabilities, including children with disabilities, through their representative organizations, in order to ensure the adequate legislative compliance with the Convention?
- Does the Greek State plan to achieve synergies among the *National Action Plan on the Rights of the Child* and the *National Action Plan on the Rights of Person with Disabilities* in order to ensure an added value with regard to child protection?

¹⁶ See GNCHR Observations on the National Action Plan on Children's Rights 2018-2020 (29.11.2018) [in Greek], http://www.nchr.gr/images/pdf/apofaseis/paidia/paratiriseis_EEDA_ESSDP.pdf, p. 31.

¹⁷ Art. 70 of Law 4488/2017 “*Public sector pensions and other social security matters, strengthening the protection of workers, rights of persons with disabilities and other provisions*” (OGG 137/A, 13.9.2017).

- Does the Greek national law provide for a legislation to specify the term “reasonable accommodation”¹⁸, given the state’s obligation to ensure the integration of persons with disabilities in the field of employment, among others?

¹⁸ See Greek anti-discrimination Law 4433/2016 “*Implementation of the principle of equal treatment regardless of racial or ethnic origin, religious or other beliefs, disability, age or sexual orientation*” (OGG 232/A, 9/12/2016) and Art. 5 of 200/78/EU available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32000L0078>

ANNEX

Human Rights and Persons with Disabilities

Alternative report Greece 2019

by the

National Confederation of Disabled People (NCDP)

For the attention of the UN-Committee on the Rights of
Persons with Disabilities

Contents

Abbreviations.....	13
Background Information about NCDP	14
Executive Summary	15
Articles 1-4: Purpose, Definitions, General Principles, General Obligations	15
Suggested question(s)	16
Article 5 - Equality and Non-Discrimination.....	16
Suggested question(s)	18
Article 6 – Women with Disabilities.....	18
Suggested question(s)	20
Article 7 – Children with Disabilities.....	20
Suggested question(s)	22
Article 9 – Accessibility.....	22
Suggested question(s)	24
Article 11 – Situations of Humanitarian Risk and Emergency	24
Suggested question(s)	26
Article 12 – Equal Recognition Before the Law	27
Suggested question(s)	27
Article 19 – Living Independently and Being Included in the Community.....	28
Suggested question(s)	28
Article 24 – Inclusive Education	28
Suggested question(s)	32
Article 27 – Work and Employment.....	33
Suggested question(s)	36
Article 29 – Participation in Political and Public Life	36
Suggested question(s)	37
Article 31 – Statistics and Data Collection.....	37
Suggested question(s)	39
References.....	40

Abbreviations

CRPD	Convention on the Rights of Persons with Disabilities
EDF	European Disability Forum
GSTHR	General Secretariat for Transparency and Human Rights
GNCHR	Greek National Commission for Human Rights
SEPE	Labor Inspectorate
EKKE	National Centre of Social Research
NCDP	National Confederation of Disabled People
POSGA meA	Pan-Hellenic Federation of Parents and Guardians of Disabled People

The Greek National Commission for Human Rights (GNCHR) is the independent advisory body to the Greek State on matters pertaining to human rights protection. It was established by Law 2667/1998 in accordance with the UN Paris Principles. Thirty-two institutions whose activities cover the field of human rights are currently represented in the GNCHR (independent authorities, departments of university-level educational institutions, workers' and disabled persons' confederations, NGOs, political parties and ministries).

Background Information about NCDP

This alternative report has been drafted by the National Confederation of Disabled People of Greece (NCDP) Observatory on Disability Issues.¹⁹ NCPD is an umbrella organization founded and established in 1989. Its founding members were federations and associations representing various disabilities, chronic diseases and family members. It is a democratically run and structured organization. Only persons with disabilities, persons with chronic diseases and family members have the right to vote and be elected in all organs of the Confederation; as delegates to the National Congress, as members of its Board and as members of the Confederation's Executive Secretariat.

The NCDP's vision and mission is to protect the interests of persons with disabilities, promote their rights and monitor the law and policy-making of the Greek State on issues concerning themselves and their families. In order to achieve this, the NCDP from the very first day of its existence has systematically set out to be recognized as the representative umbrella organization of the Greek disability movement by the State. This has been mainly achieved, and the Confederation actively participates and is involved in the decision-making process at all levels of the organization of the Greek State. The motto "Nothing about persons with disabilities without persons with disabilities" is a guiding principle in the NCDP's work to make disability rights fully visible and respected. The Confederation is a founding member of the European Disability Forum (EDF), and the NCDP's President is also the President of EDF. The NCDP has been very active in EDF's work and through EDF in the work of the International Disability Alliance (IDA). The NCDP took actively part in the negotiations for the UN Convention of the Rights of

¹⁹The 'Observatory on Disability issues' is an initiative launched by the National Confederation of Disabled People (NCDP) of Greece which is financed by the European Social Fund under the auspices of the operational program "Human Resources Development, Education and Lifelong Learning 2014-2020".

The Greek National Commission for Human Rights (GNCHR) is the independent advisory body to the Greek State on matters pertaining to human rights protection. It was established by Law 2667/1998 in accordance with the UN Paris Principles. Thirty-two institutions whose activities cover the field of human rights are currently represented in the GNCHR (independent authorities, departments of university-level educational institutions, workers' and disabled persons' confederations, NGOs, political parties and ministries).

Persons with Disabilities (CRPD) and thereafter for its implementation both in Greece and at the EU level through EDF.

The NCDP is a member of the Greek National Commission for Human Rights, of the Greek Economic and Social Council and of the European Economic and Social Committee.

Executive Summary

This present report focuses on the issues that are of main concern for persons with disabilities and their families in Greece. The report includes the views of the disability movement in Greece which is represented by the NCDP and draws conclusions from what is written in the legal framework, what is implemented and from data collected in studies. The report involved a process of consultation with the representative organizations of persons with disabilities. A more exhaustive report will be provided before the next session.

Articles 1-4: Purpose, Definitions, General Principles, General Obligations

The Greek State ratified the UN CRPD in 2012 (Law 4074) while the specific details on the implementation of the CRPD were introduced in 2017 (Law 4488) (Government Gazette 2012c; 2017b). After the enactment of the Law 4488/2017, the mandate of the coordination mechanism within the government has been assigned to the Minister of State under the Prime Minister. The focal point was first assigned to the Directorate of International Relations of the Ministry of Labor, Social Security and Social Solidarity that also prepared the Greek report and later in 2017 this mandate was assigned to the General Secretary of Transparency and Human Rights under the Ministry of Justice, Transparency and Human Rights (Government Gazette 2017).

Although there is a Constitutional provision (art. 21, par.6) pointing to the human rights approach and the social model of disability, there is no universally applied definition on disability, and thus the medical approach to disability prevails in many areas, e.g., disability assessment. The reality is that

the Greek legal framework is in a transitional phase. On the one hand, the human rights approach to disability as prescribed by the CRPD gains more and more ground, on the other, one could say that there is still dominance of the medical approach to disability.²⁰

Regarding article 4.3, it should be noted that the NCDP was only consulted at the beginning and not throughout the process of the drafting the State report.

Suggested question(s)

- How is the Greek State planning to incorporate the Convention in the legal policy and framework concerning the definition of disability?
- How does the Greek State plan to fully activate and operationalize the coordination mechanism, the central focal point, and the other focal points in the State, the regions and the municipalities?

Article 5 - Equality and Non-Discrimination

The Greek State, through its Constitution, recognizes the principle of equal rights to all citizens by stating that all citizens are equal before the law [article 4, paragraph 1; see also articles 21, 251, 116] (Government Gazette 2008a). Until the middle of the 2000s, however, there was no specific legislation concerning the prohibition of discrimination. Following the EU directives 2000/43/EC (European Council 2000a) and 2000/78/EC (European Council 2000b), in 2005 the Greek government enacted the Law 3304 adopting a legal framework against discrimination in the employment and occupation (Government Gazette 2005). Despite this effort, the Law 3304 did not cover all forms of discrimination. For instance, in regards to disability issues, while it referred to the prohibition of any direct or

²⁰After carefully studying the Greek report, and focusing on the language that has been used, it is observed that the influence of the medical model is dominant, which, certainly, is not compliant with the spirit of the Convention. Concepts such as “mental or psychological disease or disorder” (para. 10), “mental retardation” and “intelligent quotient” (para. 70), “visually impaired persons” (para.78), “diagnosed mental illness” (para. 311), to name but a few, are concepts that belong to a medical model vocabulary and for sure these expressions are not in accordance with the Convention.

indirect discrimination, nothing was stated about the associated, intersectional and/or multiple discrimination.

Therefore, in 2016 the Law 4443 was enacted revising the pre-existing law 3304/2005 and thus providing as an updated legal framework on the prohibition of discrimination based again on the EU directives 2000/43/EC and 2000/78/EC (Government Gazette 2016b). Also, as it was mentioned on article 24 of the same Law, a Presidential Decree would be enacted in order to promote the application of the above principle to more socio-political areas/fields beyond the employment and occupation, i.e., social security and healthcare. Further, echoing the Law 4488 -which was enacted in September 2017 and concerns, inter alia, topics related to persons with disabilities- the Presidential Decree, as mentioned on the Law 4443, should be enacted in twelve months after its publication (Government Gazette 2017b). At the time of the preparation and submission of this report, however, this Presidential Decree was still not enacted/established. Consequently, there is a gap in the current legislation on the application of the principle of equal treatment and to other crucial sociopolitical areas that concern persons with disabilities and chronic diseases in the country.

As for the definition, concept, and implementation of reasonable accommodation in the Greek legal framework, it is very broad and subject to diverse interpretation, e.g., it can be translated differently depending on each individual case. Specifically, the first time the concept of 'reasonable accommodation' was introduced in the Greek legal context was in 2005 after the enactment of the Law 3304 and concerned only issues that had to do with the field of employment and occupation (Government Gazette 2005). More recently, in 2016, the enactment of the Law 4443 revised the concept of reasonable accommodation, but its point of reference has remained again in the field of employment and occupation (Government Gazette 2016b). In other words, there seems to be a lack of implementing reasonable accommodation on a horizontal basis and to other policy fields beyond those of employment and vocational training.

Suggested question(s)

- Since the deadline has passed, what is the timeframe of the Greek Government to enact the Presidential Decree that will ensure the principle of equal treatment is applied beyond the field of employment and education?
- Considering article 2, paragraph 2:h of the Law 4443/2016, according to which “the denial of reasonable accommodation to persons with disabilities or with chronic diseases is a form of discrimination” as well as article 5 of the above-mentioned law which states that “this burden shall not be disproportionate when it is sufficiently remedied by measures existing within the framework of the disability policy for persons with disabilities or chronic diseases”, how is the Greek government going to act to ensure that the provision of the disproportionate burden is not abused by employers?
- After reviewing the Greek report as well as examining the current situation in the country, the actions that the Greek government has already taken have been limited only to the enactment of the relevant legal framework as well as to one action, in collaboration with the NCDP, regarding the drawing up of a toolkit for the right implementation of the principle of equal treatment for workers and employees with disabilities which was addressed to the inspectors of the Labor Inspectorate (SEPE). What kind of actions is the Greek government going to adopt in order to further raise awareness of the public and private sector as well as the citizens of the country about the principle of equal treatment?
- How does the Greek State intend to deal with reasonable accommodation in all areas that concern persons with disabilities (funding, personal assistance, technical support and so on)?

Article 6 – Women with Disabilities

Women with disabilities are in a more vulnerable situation comparing to men with disabilities. Although there are studies that have been conducted either to international or local context(s) addressing the rights of persons with disabilities in various socio-political levels of their lives, the double dimension to be both a woman and a person with disabilities is a dimension that is usually ignored or its significance, perhaps, is downgraded. In a recent study conducted by the National Centre of Social Research (EKKE) regarding the multiple discrimination in Greece, this reality has been vividly illustrated by a male participant with disabilities of this study. According to him, “they

[women with disabilities] have many more difficulties than men to face, and they [women with disabilities] are not accepted by society. I know many women who had been abandoned by their husbands when they were in a state of disability or who have never been able to find a job” (Balourdos and Sarris 2018, p. 173).

Moving from the above narrative to official data, in the recent Greek Ombudsman’s (2018) report on the principle of equal treatment in Greece during the year of 2017, there is a reference to a number of cases from Greek citizens who reported to Greek Ombudsman discrimination issues they faced in their daily lives. While this study shows that the dimensions of gender and disability or chronic diseases are the two dimensions which together gathered the highest percentages of the reported cases (ibid.), what is missing is a reference to what happens in the case of women with disabilities. There are no official data regarding women with disabilities and what it means to be a woman with disabilities in the Greek society. In other words, the current legal framework, there is a lack of laws which will protect and promote the rights of women and girls with disabilities.

Further to this, although the National Action Plan on Gender Equality 2016-2020 (General Secretariat for Gender Equality 2017) recognizes that women in Greece are in a more vulnerable situation comparing to men in regard to multiple discrimination and for that reason introduces a number of measures for the social inclusion and equal treatment of the former, the reference to women with disabilities is limited, or its reference is in a more abstract way instead of an essential one. For instance, there is not any foreseen action for women and girls with disabilities. Also by keeping in mind the multiple identities of women, the reference to mothers of persons with disabilities does not exist at all, even though this particular category of women faces many challenges at multiple levels of their everyday lives. Some of the actions that the Greek State has proposed concern specific policy fields lacking, thus, a horizontal inclusion and mainstreaming of the dimension of disability at the designing of social policies. Any reference to forced sterilization and forced abortion, though it is a critical topic among women and girls with disabilities and especially those with intellectual or psychosocial disabilities (see, for example, the report that was released by the EDF and the Fundación Cermi Mujeres in 2017), is missing, downgrading thus the

importance of this dimension to the designing policies against gender-based violence.

Suggested question(s)

- In which ways does the Greek State plan to mainstream and include in all gender-related policies the rights of women and girls with disabilities and mothers of children with disabilities?
- Does the Greek State intend to take any concrete steps in order to protect and promote the rights of women and girls with disabilities, e.g., against multiple discrimination, in the Greek legal and policy framework (how, when, and so on)?
- Considering the lack of statistical data regarding women with disabilities, what kind of actions will the Greek State undertake to provide statistical data and for women with disabilities, e.g., in State's official records, so as to be in line with the Convention?

Article 7 – Children with Disabilities

At the current legal framework, no specific law gives voice to children with disabilities, as it is mentioned in the Convention. Also, the State has not announced any action and/or strategy on how it plans to 'empower' the engagement of children with disabilities to issues that concern their own lives, e.g., their involvement in decision-making processes, participation in policy development, and so on. Furthermore, self-represented disability organizations of children with disabilities do not exist; instead, it is the families of children with disabilities, through their associations/organizations, that have the role in defending the rights of children with disabilities. In other words, **there is a lack of a specific legal framework through which children (not only children with disabilities) in Greece will have the right to share their opinion to matters that concern them.**

The Pan-Hellenic Federation of Parents and Guardians of Disabled People (POSGAMEA) has a strong presence in claiming the rights of children as equal members of the society. In the Greek report, the State claims that "the parental movement functions complementarily with the public sector". This statement, however, does not fit well with the spirit of the Convention regarding the means that a state party is obliged to provide to children with disabilities.

Also, another factor that should be underlined here is the economic crisis and the austerity-driven measures and policies that the Greek government has

enacted and implemented since 2010 and their consequences to the families of children with disabilities as well. According to the Greek National Commission for Human Rights (GNCHR) and its statement about the **impact of the economic crisis** to the citizens (Greek National Commission for Human Rights 2015), **a number of human rights have been violated** since 2010. Following the GNCHR statement, austerity measures have affected guaranteed human rights, such as the right to health and social security. In case of children with disabilities, an issue that emerged late in 2014 and attracted much attention by the media –both nationally and internationally (see, for example, BBC 2014; Cossé 2014; Hadjimatheou 2014; The Hellenic League for Human Rights 2014; Greek Minister announces plans... 2016; European Association of Service providers for Persons with Disabilities 2014; Tsiropoulou 2017)- and it is closely connected with the consequences of the economic crisis, concerns the critical problems at the operation of the units of care and treatment. The case of Lechaina Care Center,²¹ and the inhuman and terrible living conditions of the children with disabilities, who lived in this structure, brings in mind memories from past centuries regarding the treatment and care of children with disabilities. While, as described at the reports of the National Preventive Mechanism Against Torture and Ill-Treatment (The Greek Ombudsman 2015; 2016; 2017a) the living conditions currently are better than in 2015, this case raises questions for the operation of this/these structure(s) and, certainly, for the rights of children with disabilities as right-holders.

A positive step regarding the rights of children with disabilities is the enactment of the recent Law 4538/2018 that deals with the measures for the promotion of the legal and policy schemes of foster care and adoption (Government Gazette 2018a). According to this Law, the adoption and foster care of children with disabilities is put forward which is a step that complies with the content of the Convention. Also, the above law introduces the setting up of the new scheme of professional fosterage of children with disabilities, which could be considered as a ‘paradigm shift’ for the deinstitutionalization of children with disabilities, if this scheme, of course, succeeds to be applied in the Greek society.

²¹ While the Lechaina Care Center has become the ‘point of reference’ of the inhuman living conditions that children, and persons with disabilities as well, face in this type of units of care and treatment, this does not mean that the Lechaina Care Center was the only unit which operated under this way. On the contrary, there have been also and other units in the territory of Greece that have been operating in a similar ‘Medieval’ way.

Suggested question(s)

- Due to the lack of a relevant legal framework, which would promote the rights of children with disabilities, what strategy or what kind of actions will the Greek state develop and/or adopt in order to reinforce the rights of children with disabilities?
- Considering the improper conditions, as have been depicted both by the reports of National Preventive Mechanism Against Torture and Ill-Treatment and the media, what measures does the Greek State plan to undertake to promote the deinstitutionalization of children with disabilities and to create community-based services for them?
- Keeping in mind the recent Law 4538/2018, which introduces three very essential legal and policy schemes for the foster care, adoption, and professional fosterage of children with disabilities, can the representatives of the State present their actions for raising awareness and promoting these schemes to the public as well as for motivating citizens to take this kind of action?

Article 9 – Accessibility

In Greece, **though a legal framework of buildings and transport accessibility already exists, little interventions are needed to complete and/or update it.** To give some examples: i) Guidelines concerning the design of accessible services/policies and guidelines for the evacuation in emergency situations, as well as the update of national accessibility guidelines “Designing for All”, are still needed; ii) accessibility standards -when they exist- have to be referenced in any law. At the moment, only the standard EN 81-70 - Part 70 is referenced/adopted in the Law 4067/2012, article 26 (Government Gazette 2012b). Also, while there is the national standard EL0T 1439:2013 “Organization friendly to citizens with disabilities - Requirements and recommendations” (Hellenic Organization for Standardization 2013), which concerns the holistic approach of the organizations’ accessibility (such as accessibility of infrastructure, services provided, products, policies, training of staff) to persons with disabilities, it is still in a voluntary application. There is no law referring to this. **The main problem, however, concerns the absence of a national plan on the implementation of accessibility in all domains, e.g., infrastructure**

and services (both conventional and electronic), goods, policies, and so on.

Although the Law 4067/2012 -which has to do with the “New Building Code”- imposes the implementation of accessibility in existing buildings of a wide range of uses till 2020 (Government Gazette 2012b), the absence of a national accessibility plan actually devalues that provision of the law, as no budget allocation nor intermediate benchmarks had been provided to allow for monitoring the progress.

Most of the **buildings housing public services and services** of public use are still inaccessible. The same law also imposes the accessibility of all new buildings. Despite the fact that the Law 4030/2011 (Government Gazette 2011b), -which regulates the issue of building permits- imposes the preparation of an accessibility study in order to get the building permit, the enactment of the presidential decree (as foreseen in the abovementioned law) concerning the content of that accessibility study is still also pending (ibid.). What is more, though the 4030/2011 has already been reviewed by the Law 4495 in 2017 (Government Gazette 2017a), the presidential decree is still pending. In other words, this legislative gap is another crucial barrier to the built environment’s accessibility implementation.

Concerning **transport** accessibility, there is a significant differentiation of the level of existing accessibility among Athens and the rest Regions of the country. The new transportation systems (metro and tram) of Athens and, shortly, of Thessaloniki are accessible at a satisfactory level but the regional cities, apart from not having such systems as Athens and Thessaloniki, they still have many problems. Specifically, there are no accessible long-distance buses, trains still have serious problems/issues concerning accessibility and accessible taxis are very few in the whole country.

The recent Law 4488/2017 (Government Gazette 2017b) states that **Media and communication services** providers, including the Internet providers, are required to use new technologies, such as spoken web pages, subtitling, audio description, sign language interpretation for ensuring the access of disabled persons to them. The relevant Decision of the Minister of Digital Policy, Telecommunications, and Information, mentioned in article 67 of the above law -which defines the means, the process as well and any other matter for the application of the above provisions- was issued just recently in December 2018 through the Joint Ministerial Decision 3586/2018 (Government Gazette 2018c). Since the enactment of the abovementioned Decision is recent and its implementation has not been realized yet, the accessibility of the media is still pending. Consequently, media, as well as communication and information means (including public sites and sites of public use), are still inaccessible in their majority.

The staff of public authorities, providers of services of public use, engineers, designers, and so on, lack knowledge regarding the needs of persons with disabilities. The reason is that the State does not provide any training on disability and accessibility issues and there is not any educational structure responsible for providing training on these matters.

Suggested question(s)

- What are the State plans to set up a national accessibility plan, particularly in view of the obligation to ensure accessibility by 2020 (budget allocation, intermediate benchmarks to allow for the monitoring of progress, and so on)?
- What about the drafting and adoption of pending legislation (accessibility study, use of new technologies by media and communication services' providers, including the Internet providers, and so forth)? Can the State give a concrete timeframe for adoption?
- How does the State plan to make the implementation of the standard ELOT 1439:2013 "Organization friendly to citizens with disabilities - Requirements and recommendations" obligatory and use it to evaluate and certify accessibility of infrastructure and services?

Article 11 – Situations of Humanitarian Risk and Emergency

Under article 11 of the State report, there is a description of the Greek legislation of Civil Defense and Civil Protection concerning the procedures of response and preparedness in situation of risk. What this report, however,

lacks to present is that there are no specific regulations for persons with disabilities. While the report refers to extra regulations and guidelines on the planning and implementation based on the Emergency Planning Policy Plans of the Ministries and the General Civil Protection Plan, there is an information gap regarding the protection and safety of persons with disabilities. Despite the fact that the report refers to the **Geneva Convention** (International Committee of the Red Cross 1949), which is an internationally binding treaty on the protection of vulnerable persons during wartime and armed conflicts and was ratified by the Greek Law 3481/1956 (Government Gazette 1956), it does not specify which necessary implementation measures the Greek State should take for protecting persons with disabilities not only during a war but in a general situation of risk. In other words, there is an overall lack of practical implementation plans. Even though in the General Civil Protection Plan “Xenokratis” a complete scheme for crisis prevention, mitigation, intervention, response, and recovery has been introduced since 2003, there are no specific provisions for persons with disabilities in its revised operational plans. The National Centre for Social Solidarity, which has been established by article 6 of the Law 3106/2003, does not draw up an official crisis management plan to fulfill its institutional role and to ensure the rights of persons with disabilities.

Also, while article 26 of the New Building Code (Government Gazette 2012b) -states that it is obligatory for one or two (depending on floor population) **fire-protected accessible waiting areas** per floor as well as areas of refuge for persons with disabilities in case of emergency, this measure is not yet implemented though it is in force since 2012.

Regarding the **safety of persons with disabilities on ships**, in addition to the measures already mentioned in the report, a new circular by the Ministry of Mercantile Marine (Ministry of Mercantile Marine 2018) obliges all ships to have on board a special evacuation chair as well as to train their crews on disability issues. Positive measures in that domain are the

outcome of the good collaboration, as it has been established, between the Ministry of the Mercantile Marine and the national disability movement.

A prominent example that illustrates the consequences of the gaps in the existing laws, regulations, plans, and protocols and their inability for implementation, by the State's Bodies is the humanitarian emergency (see, for example, Humanitarian Coalition 2019) that Greece experienced in 2015 and continues to experience because of the mass influx of refugees. Following the Greek report, Greece should have been able to respond to this type of crisis successfully, there were, however, many **refugees and asylum seekers (or people on the move) with disabilities** who were accommodated in tents and other non-accessible structures without access to their basic needs. As emerged, despite the detailed description of the existed legislation and the relevant regulations at the report, in case of emergency, such as the refugee crisis, the Greek state has not guaranteed the protection of these specific target groups.

Suggested question(s)

- Which actions will the Greek State adopt for introducing legislation and operational plans on disability mainstreaming in humanitarian actions, policies and programs?
- When does the Greek State intend to present its strategy for providing information about the protection and rescue system available in accessible formats and technologies for persons with disabilities?
- Please elaborate on the evacuation plans and procedures tailored to the needs of persons with disabilities. For instance, are the emergency exits accessible and marked with light, sound and visual signals?
- Please elaborate on any complete and coordinated plans that meet the minimum standards according to the international guidelines and best practices, so as the persons with disabilities are protected in all stages of a crisis (e.g., evacuation, temporary secure accessible accommodation, hygiene measures, accessible latrines, water supply, and so on). See for example, The National Institute for Occupational Safety and Health (2019).
- What is the specific provision for the care of the unaccompanied minors with disabilities during a crisis?

- Please provide concrete information on how the Greek State plans to establish and provide support and services to refugees with disabilities meeting the requirements enshrined in the international treaties, the CRPD, the European acquis and the Greek legal order?

Article 12 – Equal Recognition Before the Law

According to article 4 paragraph 1 from the Greek Constitution, “all Greeks are equal before the law” (Government Gazette 2008a), a definition which complies with article 12 from the CRPD. Nevertheless, the legislation that defines the relationship between the State and persons with disabilities - regarding the rights of the latter in the legal framework- is not in accordance with the CRPD. More specifically, we refer to the institution of the **‘judicial support,’ which is a form of guardianship** (Government Gazette 1984). In line with article 1666 of the Civil Code, “an adult shall be assisted in judicial support, when, due to his/her *mental, intellectual or physical disability* cannot take care of his/her affairs[...] a minor who is under parental care or guardianship, may be subjected to ‘judicial support’, if the conditions are met, during the last year of his/her childhood” (ibid.). In order to highlight how the procedure of obtaining judicial support in the Greek legal system is not in accordance with article 12 of the Convention, we describe below the procedure a parent should follow to request judicial support for his/her child with a disability -who his/her disability belongs to the disability categories that mentioned in the Civil Code- before his/her adulthood.

Suggested question(s)

- Considering that the existed legal framework for equal recognition before the law has not been reformed since the 1990s and its content is not compatible with the article 12 of the Convention, what steps does the Greek government plan to adopt in order to reform the current substituted decision-making with the supported decision-making for being compatible with article 12 of the Convention?
- How does the Greek State plan to revise all the legal codes (civil, penal and so on) so that they are compliant to the CRPD provisions?
- What measures and programs does the Greek State plan to put in place concerning the training on the CRPD of those who are comprising the judiciary system in Greece (lawyers, judges and so on)?

Article 19 – Living Independently and Being Included in the Community

Suggested question(s)

- Considering the expressed will of the Greek State to elaborate and implement a National Deinstitutionalization Plan, what is the state of play? Is there any timeframe established to achieve this?
- How does the Greek State plan to reform the existing legal framework providing thus the right to persons with disabilities to choose or decide the type of the independent living that s/he wants to have so as to be harmonized with the CRPD provisions?
- Please provide information on plans to introduce in law and practice ‘personal assistance’ schemes for persons with disabilities?
- Taking into account the fact that most of the social services, day care centers, support centers, children with disabilities municipal support centers, and so on, are funded by EU funding, how does the Greek State plan to provide secured national funding ensuring thus the stability and viability of the services?
- Which measures does the Greek State enact and implement in order to ensure that all persons with disabilities have the right to live in the supported living housing units?

Article 24 – Inclusive Education

In the field of education, the Law 3699/2008, which sets the institutional framework concerning the **Special Education** of individuals with disabilities or special educational needs (Government Gazette 2008b), **remains up to now a separate legislation concerning the education of students with disabilities**. However, despite the increasing trend towards the inclusion of pupils and students with disabilities in mainstream schools, **many pupils and students with disabilities still receive education in special school units**. Following the law mentioned above, pupils and students with disabilities have the opportunity to attend mainstream classes with or without parallel support from a teacher providing special education, special classes that operate within the general education system, or special schools depending on the type of disability and special educational needs. Today, there are 11.371 children with disabilities attending

special schools, with the vast majority of them being children with intellectual disabilities (37,1% in 2016), autism (28,9% in 2016) and multiple disabilities (14,1% in 2016). It should be noted that the number of pupils in special pre-schools and primary schools has sharply increased during the years 2007-2016 (114,4% & 27,5% respectively) (Center for the Development of Educational Policy/General Confederation of Greek Workers and National Confederation of Disabled People 2018b).

The education of pupils with disabilities in mainstream schools takes place at a large extent within **special classes**²², **which do not meet the criterion of definition of “inclusive setting”** that was agreed among the ministerial representatives of European Agency member countries.²³ Based on research findings, special classes are insufficient due to many problems. The lack of adequate number of staff and the large number of students are examples that fall into this category. From 2011 to 2016 (Center for the Development of Educational Policy/General Confederation of Greek Workers and National Confederation of Disabled People 2018b), a sharp increase in average size of special classes took place. In 2016, the average number of students in secondary education special classes was 14.6, whereas the maximum number of students as defined by the law is 12. Additionally, combining the special classes in one may not have the desirable outcome since the classes are usually consisted of students with disabilities whose disabilities are of highly different categories or students that have an official diagnosis while others do not (for example, minor refugees).

Concerning the students with disabilities attending mainstream classes, the Greek Ombudsman in its Annual Report for 2017 (The Greek Ombudsman

²²Special classes are classes situated in general schools where pupils with disabilities receive teaching in separate environment than that of the ordinary classes where all students attend

²³ An inclusive setting refers to education where the pupils with disabilities and pupils with SEN follow education in mainstream classes alongside their mainstream peers for the largest part – 80% or more-of the school week’ (European Agency), in Greece, students in special classes participate in mainstream classes in a percentage of 50%

2017b) points out that the biggest problem is the **lack of available financial resources to adequately meet the needs of all students**. As a result, some students are given priority over others or in many cases the provision of parallel support is only given on a partial basis.

In regard to the general support within mainstream schools (psychologists, social workers, occupational therapists, and so on), although progress has been made during the last years, **general support is still very limited due to lack of staff**, (for instance, in secondary education in 2014 there were in total just 263 specialists for 1794 school units). Many children with care and medical needs are facing violation of their right to inclusive education due to the lack of school nurses and special support staff. Pupils and students with diabetes who face plenty of difficulties, either due to the lack of nurses or due to the insufficiently trained staff, is a representative example here.

Until recently the evaluation of the educational needs of student with disabilities, as well as the provision of the relevant support, were based exclusively in the medical model of disability. The recently adopted Law 4547/2018 “Reorganizing supportive structures in primary and secondary education and other provisions” (Government Gazette 2018b), attempts to reform the diagnostic and supportive system services with an orientation towards a more inclusive educational system, taking into account the social dimensions and barriers in education.

As far as the physical accessibility of school buildings is concerned, the Ministry of Education has recently made an investigation (2017) which reveals, according to the Minister of Education (as cited in Lampridi 2018), that **a large proportion of school buildings do not even meet the minimum standards of physical accessibility**, which actually means lack of ramps and elevators.

The educational material, services and equipment, the electronic environment, and the information provided to students remain at a great extent inaccessible. Students with visual impairments face several problems concerning the accessibility of educational material. Many school books either have not been translated in Braille yet or they have been wrongly translated -without making use of the available contemporary technologies.

Another basic weakness of the Greek educational system is the **very limited access to early intervention and pre-school services for children with disabilities**, services that in fact are provided by a few non-governmental agencies. The development of public early intervention structures as foreseen by the Law 3699/2008 has not been released yet (Government Gazette 2008b).

The statistical data about pupils and students with disabilities are few and the overall number of pupils and children with disabilities is still unknown. In addition to that, the numbers of children with disabilities out of school, as well as the early school leaving rates for people with disabilities, are still missing.

Due to the inferior/low quality primary and secondary education they have been provided, persons with disabilities in Greece have very limited access to tertiary education. In line with the data of the European Health and Social Integration Ad hoc- Survey (EHSIS), in 2012 only 5.4% of the population of persons with disabilities in Greece had a university degree (ISCED 5-6) (Center for the Development of Educational Policy/General Confederation of Greek Workers and National Confederation of Disabled People 2018a).

According to the Greek National Commission of Human Rights, in Greece the special education system is still regarded as inferior to the general

education system (Greek National Commission for Human Rights 2017). The unequal treatment of education of students with disabilities is apparent when funding issues are concerned. As the Greek state initial report shows, the majority of teachers of special education as well as the supportive services for children with disabilities, are almost exclusively funded by the National Strategic Reference Framework (NSRF). As a result, special education in Greece is mainly provided by temporary staff as in special schools the 80% of the teaching staff is changing every year.

A positive initiative has been recently undertaken by the Ministry of Education in order to hire 4500 permanent teachers in special education. Moreover, a new legislation that is being adopted by the Greek parliament, introduces a new evaluation system for the recruitment of teachers in primary and secondary education, which gives priority to the teachers with disabilities.

Suggested question(s)

- Has the Greek State elaborated and implemented a holistic plan for the inclusion of pupils and students with disabilities in the primary and secondary education, in technical education and vocational training as well as in tertiary and postgraduate education?
- How has the Greek State addressed or intends to address the inequalities and discrimination that persons with disabilities face in all levels of the educational system?
- Does the Greek State plan to revise the school books and the teaching material in all levels of educational system to be compliant with the CRPD provisions so that pupils and students with or without disabilities are educated according to the rights-based approach to disability?
- How does the Greek State plan to concretely address the barriers that students with disabilities face in tertiary and postgraduate education, e.g., accessibility, sign language interpretation to deaf students, support to students with visual impairments, and so on?
- Given the increasing tendency in the students' population of special pre-school and primary education, does the Greek State have or intends to have any strategy or action plan to ensure the transition of learners with disabilities from special to inclusive education?
- Please elaborate, on any action plan i) to ensure early identification of children with disabilities, and ii) to establish affordable public services

for early intervention and education for all children who have special educational needs?

- Please provide information on any mechanism in place to monitor the appropriateness and effectiveness of accommodations provided in education.
- Please inform on safe, timely and accessible mechanism for redress when students with disabilities and their families have not been adequately provided or have experienced discrimination.

Article 27 – Work and Employment

Based on the findings of a recent study conducted by the Observatory on Disability Issues of the NCDP (NCDP Observatory on Disability Issues 2018)²⁴, the **access of persons with disabilities to the existing labor market is limited**.

The study shows that:

i) the employment rate of “persons with severe disabilities”²⁵ aged 25 to 69 stands at 24,2%, which is 33,4 percentage points lower than the rate of persons without disabilities (57,6%) and 46 percentage points lower than the national goal of the “Europe 2020” strategy;

ii) The unemployment rate of “persons with severe disabilities” stands at almost 39%. The highest unemployment rate of persons with severe disabilities between 25-29-year-old group is 58,2%, while the corresponding rate of persons without disabilities aged 25-29 is 40,9%;

iii) The 60,4% of “persons with severe disabilities” and the 39,2% of persons with moderate activity limitations belong to the non-working population, while the corresponding rate in the population of persons without disabilities is 23,7% (NCDP Observatory on Disability Issues 2018). Also, the analysis of non-working population shows that in all age groups of persons with severe disabilities: the percentage stands at over 40%;

iv) Within the population of “persons with severe disabilities”, the 83% of persons between 20-24 years old, the 72% of persons between 25-29 years old, and the 55,5% of persons between 30-34 years old, they do not have any working experience; and,

²⁴For this study the Observatory on Disability issues of NCDP used the employment variables included in the sample survey Income and Living Conditions (EU-SILC) in 2016 (with reference year 2015) as conducted by the Hellenic Statistical Authority in collaboration with the Eurostat.

²⁵Here we want **underline** that the concept “persons with severe disabilities” is not a concept that expresses the author’s views. However, since this concept has been used by the Greek official authorities for referring to the issues that we are talking about, we continue to use it but we put it in brackets in order to show our differentiation.

v) The 84% of workers with disabilities state that employers have failed to provide them reasonable accommodations (ibid.).

Although the State has made efforts to increase the employment rate of persons with disabilities through the adoption of legislative measures, the enactment of the Law 2643/1998 (Government Gazette 1998) that revised the preexisting Law 1648/1986 has had a limited impact on the employment rate of persons with disabilities in the public sector and almost no impact on the private sector.

The enactment of the Law 4440/2016 has already created a new legal environment for the recruitment of persons with disabilities and their family members in the public sector increasing vastly the number of those working in the public sector in the two years of implementation of the Law (Government Gazette 2016a).²⁶Specifically, this Law foresees that the 10% and the 5% of the positions to be filled by regular personnel and personnel with non-fixed private law contracts in the public sector -including legal persons governed by public law and organizations of local authorities- should be covered by persons with disabilities with a certified disability percentage at least 50% and by relatives of persons with disabilities with a certified disability percentage at least 67% respectively (ibid.). This Law, however, concerns vacant positions only to public sector and not to private one. In other words, what is missing is more measures to be taken for improving the placement of persons with disabilities in the open labor market.²⁷

Concerning the **principle of equal treatment in employment and occupation**, the replacement of the Law 3304/2005 by the Law 4443/2016 (Government Gazette 2016b), which re-incorporates the Directive

²⁶The enactment of this Law is the result of the Greek disability movement campaign to remedy the unequal treatment that persons with disabilities are facing in the recruitment in the public sector compared to other social groups, such as families with more than three children.

²⁷To give some examples and/or recommendations, e.g., i) provision of tax and insurance incentives to the private sector employers, ii) implementation of the model of supported employment, iii) adoption of the personal assistant, to name but a few.

2000/78/EC (EU Council 200a) in the Greek legislation, was a significant development, which is in line with the CRPD provisions. However, what is currently missing is the appropriate measures for supporting the implementation of reasonable accommodations.²⁸

According to the data that were presented at the Greek Ombudsman's (2018) "Equal treatment - Special report 2017", what is crucial to be highlighted here is that the number of received complaints pertaining to discrimination on grounds of disability or chronic diseases are very low, comparing with the above-mentioned data (please, see point (v) on the previous page) where **84% of workers with disabilities state that employers have failed to provide them reasonable accommodations**. Besides, most of the complaints are against the public sector, which means that the fear of dismissal in the private sector is a critical barrier for persons with disabilities to make use of the provisions of the Law 4443/2016 (Government Gazette 2016b).

Another barrier that persons with disabilities and chronic diseases have to face as job-seekers concerns their transaction with the Manpower Employment Organization (OAED), which is the central management structure of active employment policies. Since there are no representatives of the disability movement in the board of OAED, the dimension of disability is not mainstreamed into OAED's policy design. By that is meant that the OAED's website is not accessible to persons with disabilities, the programs for the creation of new jobs by subsidizing the labour costs and the social security

²⁸The Law 4443/2016 abolishes the prior legislative allocation of responsibilities to three different authorities, as it was provided by the Law 3304/2005, e.g., the Greek Ombudsman, the Labor Inspectorate (SEPE) and Equal Treatment Committee of the Ministry of Justice. At present, the Greek Ombudsman is the only competent national authority for promoting and monitoring the implementation of the principle of equal treatment in employment and occupation. The fundamental developments, as introduced by the Law 4443/2016, regarding disability and chronic diseases are the following: i) the addition of the chronic diseases as a non-permissible criterion of discrimination; ii) the inclusion of the multiple discrimination based on disability and/or chronic diseases; iii) the denial of reasonable accommodations as a ground for discrimination; and, iv) the notion of discrimination by association.

contributions for the benefited persons for a specific period of time addressed to private-sector employers do not provide more incentives for the recruitment of persons with disabilities.

Suggested question(s)

- Considering the fact that persons with disabilities do not enjoy an overarching strategy for the promotion of their employment and vocational training, please provide information on how the Greek State plans to address this gap in public policy and how the Greek state intends to establish a targeted initiative dealing with the inclusion of persons with disabilities in new forms of economy like social economy, circular economy, and so on.
- How does the Greek government plan to reform the existing quota system (Law 2643/1998) for the recruitment of persons with disabilities both at public and private sector, in order to make it efficient and harmonized with the requirements of Article 27 of the Convention?
- How does the Greek State plan to address the supported employment for persons with disabilities?

Article 29 – Participation in Political and Public Life

While the right to vote for citizens with disabilities is legally regulated (Government Gazette 2012a; Ministry of Interior and Administrative Reconstruction 2015), in practice things are quite different. Election campaign programs and the whole electoral printed material as well are not available in accessible formats such as sign language, Braille/large characters or easy to read forms, and so on. Further, in the course of TV political debates and interviews by the representatives of the political parties, there has been no use of sign language interpretation and subtitling.

At the voting centers, the infrastructure is usually inaccessible to persons with physical disabilities and, particularly, to wheelchair users. Also, the voting material in alternative formats and sign language interpreters are not available in voting centers. Thus, despite the fact that the legal framework foresees the right to vote to citizens with disabilities and there is a specific

Presidential Decree that refers to the procedure supporting the exercising of the right to vote of persons with disabilities, the secrecy of voting for them is not provided. Quite often wheelchair users are exercising their right to vote, for example, on the street, in a car, in a toilet, and so on. Blind persons are never sure for the final destination of their ballot. Deaf persons have to guess which is the right ballot box, especially, in cases of simultaneous multiple voting procedures.

It is true that elected officers with disabilities of municipalities are supported by the increment of the fees paid to the elected officers (Government Gazette 2010) and a blind Vice Mayor can hire a special assistant (Law 3979/2011, Government Gazette 2011a). These measures, however, are restricted to those specific/certain categories of elected officers - which means that they are provided only to certain concrete cases- and, therefore, do not cover all categories of elected political personnel.

Suggested question(s)

- Which measures will the Greek State take to provide more accessible voting procedures (e.g. stations, campaign and voting material, voting procedure, and so on)? Could the State provide concrete timetables having in mind also the forthcoming European elections and other elections that will take place in the country?
- What are the plans of the Greek State to provide voting material in alternative formats based on the needs of persons with disabilities?

Article 31 – Statistics and Data Collection

According to article 68 of the recent Law 4488/2017 (Government Gazette 2017b, pp. 2336-2340), the Greek Statistical Authority as well as the agencies and bodies of the Greek Statistical System should develop, produce and disseminate official statistics on persons with disabilities and the barriers that the latter face when exercising their rights. For planning purposes of

these statistics and the dissemination of the produced data, they should consult with the Observatory on Disability Issues of the NCDP.²⁹

The Hellenic Statistical Authority collects data for persons with disabilities in Greece mainly within the frame of the European Statistical Program. Within this framework the data collection about persons with disabilities had been largely restricted until recently to health surveys, due to the dominance of the medical model of disability.

Apart from the field of health research, data on persons with disabilities have mostly been collected without regularity, e.g., by carrying out ad hoc surveys such as the “Labor Force Survey -2011” (Eurostat 2012), the “European Health and Social Integration Survey-2012” (Eurostat 2015). As a result, they cannot be used for monitoring and most of them are out of date, do not allow for disaggregation by category of disability, gender, age and place of residence, ethnicity, they use definitions and terms that are incompatible to the Convention and they apply methodological approaches that are not adapted to the target population.

The only consistent source of social data for persons with disabilities is the annual Survey on Income and Living Conditions of Households (SILC), which collects data on poverty and social exclusion in Europe. Since 2006, however, when the proxy indicator -Gali Index)- for disability was included in SILC Survey, the SILC data in Greece have not been analyzed and disseminated by the Hellenic Statistical Authority, taking into account the disability dimension. This activity is now undertaken on a regular basis by the Observatory on Disability Issues of the National Confederation of Disabled People (NCDP), with a view to making these data useful in the monitoring of the implementation and protection of persons with disabilities’ rights, as well as to make them widely known and accessible.

A strategic plan has not yet been drafted for developing a comprehensive data-collection system allowing, thus, for an assessment of the extent to which

²⁹ The “Observatory on Disability Issues” has established regular communication and cooperation with the agencies of the statistical system. Moreover, the Observatory on Disability Issues had submitted to the Hellenic Statistical Authority a proposal, which has been approved, for the improvement and enrichment of the Greek questionnaire of SILC survey, with an orientation towards the integration of questions concerning social barriers. Additionally, because of this initiative the “Washington Group (WG) Short Set”, which is a set of questions for identifying the most vulnerable and at risk for social exclusion persons with disabilities, has been also included into the Greek questionnaire since 2018, as supplementary to GALI index, following the guidelines of the United Nations Statistical Office and the Eurostat. The Observatory on Disabilities Issues of NCDP has as the primary goal of its research activity to develop an independent monitoring framework of the CRPD, with a great emphasis on the development of disability-rights statistical indicators.

all persons with disabilities are exercising all of their rights under the Convention.

A major problem in relation to the effective integration of the disability dimension in population and social surveys is not the unwillingness of the competent agencies. Instead, it is the lack of capacity of the Hellenic system in the field of disability research, including issues of adaptability and accessibility of the research process, as well as issues of research design on the basis of the social model and the rights-based approach. A distinctive example is that Greece in its “Voluntary National Review on the Implementation of the 2030 Agenda for Sustainable Development-July 2018” does not present any disaggregated data on the basis of disability (General Secretariat of the Government 2018).

Suggested question(s)

- Please provide information on an overall strategy for establishing a unified data-collection system allowing, thus, for an assessment of the extent to which all persons with disabilities are exercising all of their rights under the Convention.
- What kind of actions will the Greek government adopt to enhance the capacity of the Hellenic Statistical System for designing, collecting, and analyzing data for persons with disabilities on the basis of a rights-based approach to disability?

References

Balourdos, Dionysis, and Nikos Sarris (eds.). (2018). *Tackling Multiple Discrimination in Greece*. Athens: ION Publishers.

BBC (2014, November 14). Disabled children locked up in cages in Lechaina, Greece. [Video post]. Retrieved February 7, 2019, from <https://www.youtube.com/watch?v=d5KPcvoO7mg>.

Center for the Development of Educational Policy/General Confederation of Greek Workers and National Confederation of Disabled People. (2018a). Annual Report for education 2017-2018, Vol. I. Athens: KANEP-GSEE. Retrieved February 8, from https://www.kanep-gsee.gr/wp-content/uploads/2018/05/ETEKTH_2017-28.pdf

Center for the Development of Educational Policy/General Confederation of Greek Workers and National Confederation of Disabled People. (2018b). Annual Report for education 2017-2018, Vol. II. Athens: KANEP-GSEE. Retrieved February 8, from https://www.kanep-gsee.gr/wp-content/uploads/2018/11/ETEK_2017-2018_B.pdf

Cossé, Eva (2014, November 14). Dispatches: Greece - No Excuse for Caging Children. [Weblog post]. Retrieved February 7, 2019, from <https://www.hrw.org/news/2014/11/18/dispatches-greece-no-excuse-caging-children>.

European Association of Service Providers for Persons with Disabilities. (2014, November 19). Another human rights scandal: time for the EU to act! [Press release]. Retrieved February 7, 2019, from http://www.easpd.eu/sites/default/files/sites/default/files/News/pr_di.pdf

European Disability Forum (EDF) and Fundación Cermi Mujeres (2017). *Ending forced sterilisation of women and girls with disabilities*. Retrieved February 7, 2019, from www.edf-feph.org

Eurostat. (2012). European Union Labour Force Survey - Annual results 2011. Retrieved February 8, 2019, from <https://ec.europa.eu/eurostat/documents/3433488/5585208/KS-SF-12-040-EN.PDF/06941c0b-7a22-4f06-b48e-318aa83073c1>

Eurostat. (2015). European Health and Social Integration Survey. Retrieved February 8, 2019, from <https://circabc.europa.eu/sd/a/d1c2a0d7-c187-4888-8fd5-2a6524e8518e/Draft%20EU%20Quality%20Report%20for%20Circa.docx.pdf>

EU Directive. (2000a). Directive 2000/43/EC of 29 June 2000 implementing the principle of equal treatment between persons irrespective of racial or ethnic origin. Official Journal L 180. Brussels, July 19, pp. 0022-0026.

EU Directive. (2000b). Directive 2000/78/EC of 27 November 2000 establishing a general framework for equal treatment in employment and occupation. Official Journal L 303. Brussels, December 2, pp. 0016-0022.

General Secretariat for Gender Equality. (2017). *Εθνικό σχέδιο δράσης για την ισότητα των φύλων 2016-2020* [National Action Plan on Gender Equality 2016-2020] Athens: Ministry of Interior. Retrieved February 7, 2019, from: www.isotita.gr [in Greek], and www.isotita.gr [in English].

General Secretariat of the Government. (2018). Hellenic Republic: Voluntary National Review on the Implementation of the 2030 Agenda for Sustainable Development. Retrieved February 8, 2019, from https://sustainabledevelopment.un.org/content/documents/19378Greece_VNR_Greece_2018_pdf_FINAL_140618.pdf.

Government Gazette (FEK). (1956). Law 3481, nr. 3. *Περί κυρώσεως των Συμβάσεων της Γενεύης της 12ης Αυγούστου 1949* [On the ratification of the Geneva Convention of 12 August 1949]. Athens, January 5.

Government Gazette. (1984). Presidential Decree, nr. 164. *Αστικός Κώδικας* [Civil Code]. Athens, October 24.

Government Gazette (FEK). (1998). Law 2643, nr. 220. Μέριμα για την απασχόληση προσώπων ειδικών κατηγοριών και άλλες διατάξεις [Ensure the employment of specific categories and other provisions]. Athens, September 28.

Government Gazette (FEK). (2005). Law 3304, nr. 16. *Εφαρμογή της αρχής της ίσης μεταχείρισης ανεξαρτήτως φυλετικής ή εθνοτικής καταγωγής, θρησκευτικών ή άλλων πεποιθήσεων, αναπηρίας, ηλικίας ή γενετήσιου προσανατολισμού* [Application of the principle of equal treatment regardless of racial or ethnic origin, religion or belief, disability, age or sexual orientation]. Athens, January 27.

Government Gazette (FEK). (2008a). *Σύνταγμα της Ελλάδος* [The Constitution of Greece]. Nr. 120, Athens, June 27.

Government Gazette (FEK). (2008b). Law 3699, nr. 199. *Ειδική Αγωγή και Εκπαίδευση ατόμων με αναπηρία ή με ειδικές εκπαιδευτικές ανάγκες* [Special Education of individuals with disabilities or special education needs]. Athens, October 2.

Government Gazette (FEK). (2010). Law 3852, nr. 87. *Νέα Αρχιτεκτονική της ΑυτοΔιοίκησης και της Αποκεντρωμένης Διοίκησης - Πρόγραμμα Καλλικράτης* [New Architecture of Local Government and Decentralized Administration - Kallikratis plan]. Athens, June 7.

Government Gazette (FEK). (2011a). Law 3979, nr. 138. *Γιατηνηλεκτρονικήδιακυβέρνησηκαιλοιπέςδιατάξεις* [Fore-Governmentandotherprovisions]. Athens, June 16.

Government Gazette (FEK). (2011b). Law 4030, nr. 249. *Νέος τρόπος έκδοσης αδειών δόμησης, ελέγχου κατασκευών και λοιπές διατάξεις* [New way of issuing building permits, building inspections, and other provisions]. Athens, November 25.

Government Gazette (FEK). (2012a). Presidential Decree 26, nr. 57. *Κωδικοποίηση σ'ενιαίο κείμενο των διατάξεων της νομοθεσίας για την εκλογή βουλευτών* [Codification in a single text of the provisions of the legislation on the election of Members]. Athens, March 12.

Government Gazette (FEK). (2012b). Law 4067, nr. 79. *Νέος Οικοδομικός Κανονισμός* [New Building Code]. Athens, April 9.

Government Gazette (FEK). (2012c). Law 4074, nr. 88. *Κύρωση της Σύμβασης για τα δικαιώματα των ατόμων με αναπηρίες και του Προαιρετικού Πρωτοκόλλου στη Σύμβαση για τα δικαιώματα των ατόμων με αναπηρίες* [Ratification of the Convention on the Rights of Persons with Disabilities and the Optional Protocol to the Convention on the Rights of Persons with Disabilities]. Athens, April 11.

Government Gazette (FEK). (2016a). Law 4440, nr. 224. *Ενιαίο Σύστημα Κινητικότητας στη Δημόσια Διοίκηση και την Τοπική Αυτοδιοίκηση, υποχρεώσεις των προσώπων που διορίζονται στις θέσεις των άρθρων 6 και 8 του Ν. 4369/2016, ασυμβίβαστα και πρόληψη των περιπτώσεων σύγκρουσης συμφερόντων και λοιπές διατάξεις* [Single system of mobility in public administration and local government, obligations of the persons appointed under articles 6 and 8 of Law 4369/2016, incompatibilities and prevention of conflicts of interest and other provisions]. Athens, December 2.

Government Gazette (FEK) (2016b). Law 4443, nr. 232. I) *Ενσωμάτωση της Οδηγίας 2000/43/EK περί εφαρμογής της αρχής της ίσης μεταχείρισης προσώπων ασχέτως φυλετικής ή εθνοτικής τους καταγωγής, της Οδηγίας 2000/78/EK για τη διαμόρφωση γενικού πλαισίου για την ίση μεταχείριση στην απασχόληση και την εργασία και της Οδηγίας 2014/54/ ΕΕ περί μέτρων που διευκολύνουν την άσκηση των δικαιωμάτων των εργαζομένων στο πλαίσιο της ελεύθερης κυκλοφορίας των εργαζομένων, II) λήψη αναγκαίων μέτρων συμμόρφωσης με τα άρθρα 22, 23, 30, 31*

παρ. 1, 32 και 34 του Κανονισμού 596/2014 για την κατάχρηση της αγοράς και την κατάργηση της Οδηγίας 2003/6/EK του Ευρωπαϊκού Κοινοβουλίου και του Συμβουλίου και των Οδηγιών της Επιτροπής 2003/124/EK, 2003/125/EK και 2004/72/EK και ενσωμάτωση της Οδηγίας 2014/57/ΕΕ περί ποινικών κυρώσεων για την κατάχρηση αγοράς και της εκτελεστικής Οδηγίας 2015/2392, ΙΙΙ) ενσωμάτωση της Οδηγίας 2014/62 σχετικά με την προστασία του ευρώ και άλλων νομισμάτων από την παραχάραξη και την κιβδηλεία μέσω του ποινικού δικαίου και για την αντικατάσταση της απόφασης - πλαίσιο 2000/383/ΔΕΥ του Συμβουλίου και ΙV) Σύσταση Εθνικού Μηχανισμού Διερεύνησης Περιστατικών Αυθαιρεσίας στα σώματα ασφαλείας και τους υπαλλήλους των καταστημάτων κράτησης και άλλες διατάξεις [I) Incorporation of the Directive 2000/43 / EC implementing the principle of equal treatment between persons irrespective of racial or ethnic origin, the Directive 2000/78 / EC establishing a general framework for equal treatment in employment and occupation and the Directive 2014/ 54 / EU on measures to facilitate the exercise of workers' rights within the framework of the free movement of workers, ΙΙ) taking the necessary measures to comply with Articles 22, 23, 30, 31 (paragraphs 1, 32 and 34) of the Regulation 596/2014 on market abuse and repealing Directive 2003/6 / EC of the European Parliament and of the Council and the Commission Directives 2003/124/EC, 2003/125 EC and 2004/72/EC and the transposition of the Directive 2014/57/EU on the penalties for market abuse and the Implementing Directive 2015/2392, ΙΙΙ) incorporating the Directive 2014/62 on the protection of the euro and other currencies from counterfeiting through criminal law and replacing Council Framework Decision 2000/383/JHA, and ΙV) establishment of a National Emergency Response Investigation Facility for security forces and custodial staff and other provisions]. Athens, December 9.

Government Gazette (FEK) (2017a). Law 4495, nr. 167. Έλεγχος και προστασία του Δομημένου Περιβάλλοντος και άλλες διατάξεις [Control and protection of the built environment and other provisions]. Athens, November 03.

Government Gazette (FEK) (2017b). Law 4488, nr. 137. Συνταξιοδοτικές ρυθμίσεις Δημοσίου και λοιπές ασφαλιστικές διατάξεις, ενίσχυση της προστασίας των εργαζομένων, δικαιώματα ατόμων με αναπηρίες και άλλες διατάξεις [Public sector pension arrangements and other social provisions, strengthen the protection of

workers, rights of persons with disabilities and other provisions]. Athens, September 13.

Government Gazette (FEK). (2018a). Law 4538, nr. 85. Μέτρα για την προώθηση των θεσμών της αναδοχής και υιοθεσίας και άλλες διατάξεις [Measures to promote the institutions of fostering and adoption, and other provisions]. Athens, May 16.

Government Gazette (FEK). (2018b). Law 4547, nr. 102. Αναδιοργάνωση των δομών υποστήριξης της πρωτοβάθμιας και δευτεροβάθμιας εκπαίδευσης και άλλες διατάξεις [Reorganizing supportive structures in primary and secondary education and other provisions]. Athens, June 12.

Government Gazette (FEK). (2018c). Joint Ministerial Decision 3586, nr. 5491. Καθορισμός των μέσων, της διαδικασίας καθώς και κάθε άλλου θέματος τεχνικού ή λεπτομερειακού χαρακτήρα για την διασφάλιση της πρόσβασης των Ατόμων με Αναπηρία στις υπηρεσίες των παροχών υπηρεσιών μέσων μαζικής ενημέρωσης και επικοινωνίας [Define the means, process and any other technical or detailed matter for ensuring the access of persons with disabilities to media and communication services]. Athens, December 6.

Greek Minister announces plans to reform state-run institution for disabled children. (2016, January 28). [Weblog post]. Retrieved February 7, 2019, from https://www.eurochild.org/news/news-details/article/greek-minister-announces-plans-to-reform-state-run-institution-for-disabled-children/?tx_news_pi1%5Bcontroller%5D=News&tx_news_pi1%5Baction%5D=detail&cHash=eb2eb068a621b3e48a8c86cf44925f24

Greek National Commission for Human Rights (GNCHR). (2015). *GNCHR statement on the impact of the continuing austerity measures on human rights*. Retrieved February 7, 2019, from www.nchr.gr [in English].

Greek National Commission for Human Rights (GNCHR). (2017). *GNCHR statement on ensuring the timely start of the school year 2017-18 for children with*

disabilities and/or special educational needs. Retrieved February 8, 2019 from: <http://www.nchr.gr/>[in Greek].

Hadjimatheou, Chloe. (2014, November 14). The disabled children locked up in cages. [Weblog post]. Retrieved February 7, 2019, from <https://www.bbc.com/news/magazine-30038753>.

Hellenic Organization for Standardization. (2013). Organization friendly to citizens with disabilities - Requirements and recommendations (Standard No. 1439. Retrieved February 8, 2019, from http://www.elot.gr/1166_ELL_HTML.aspx.

Humanitarian Coalition. (2019). What Is a Humanitarian Crisis? Retrieved February 8, 2019, from <https://www.humanitariancoalition.ca>.

International Committee of the Red Cross (ICRC). (1949). *Geneva Convention Relative to the Protection of Civilian Persons in Time of War* (Fourth Geneva Convention), 12 August 1949, 75 UNTS 287. Retrieved February 8, 2019, from <https://www.refworld.org/docid/3ae6b36d2.html>.

Lampridi, Foteini. (2018). Σχολεία «ανοιχτά» σε ΑμεΑ: Το νομοσχέδιο και ποιοι αντιδρούν [Schools "open" to persons with disabilities: The bill and who are reacting]. [Weblog post]. Retrieved February 8, 2019, from <https://tvxs.gr/news/ellada/sxoleia-anoixta-se-amea-nomosxedio-kai-poioi-antidroyn>.

Ministry of Interior and Administrative Reconstruction. (2015). *Circular 22044/29.06.2015. Διευκολύνσεις για τους πολίτες με αναπηρία στο δημοψήφισμα της 5ης Ιουλίου* [Facilities for people with disabilities in the referendum of July 5]. Athens, June 29.

Ministry of Mercantile Marine. (2018). *Circular 2070.0/73832/2018. Μετακινήσεις των ΑμεΑ με τα επιβατηγά πλοία* [Movement of persons with disabilities with passenger ships]. Athens, October 10.

NCDP Observatory on Disability Issues. (2018). *2ο Δελτίο Παρατηρητηρίου Θεμάτων Αναπηρίας της ΕΣΑμεΑ: Δείκτες απασχόλησης και πληθυσμός με Αναπηρία-Μέρος Α* [2nd Bulletin of the NCDP Observatory on Disability Issues: Employment Indicators and population with disabilities, part A]. Athens: NCDP Observatory on Disability Issues. Retrieved February 8, 2019, from <https://www.paratiritirioanapirias.gr/el/results/publications/16/20-deltio-parathrhthrioy-8ematwn-anaphrias-ths-esmea-deiktes-apasxolhshs-kai-plh8ysmos-me-anaphria-meros>[in Greek].

The Greek Ombudsman. (2015). *Εθνικός Μηχανισμός για την πρόληψη των βασανιστηρίων και της κακομεταχείρισης – Ειδική έκθεση 2015* [National Preventive Mechanism Against Torture and Ill-Treatment - Annual Special Report 2015]. Athens: The Greek Ombudsman. Retrieved February 7, 2019, from www.synigoros.gr[in English].

The Greek Ombudsman. (2016). *Εθνικός Μηχανισμός για την πρόληψη των βασανιστηρίων και της κακομεταχείρισης – Ειδική έκθεση 2016* [National Preventive Mechanism Against Torture and Ill-Treatment - Annual Special Report 2016]. Athens: The Greek Ombudsman. Retrieved February 7, 2019, from www.synigoros.gr[in English].

The Greek Ombudsman. (2017a). *Εθνικός Μηχανισμός για την πρόληψη των βασανιστηρίων και της κακομεταχείρισης – Ειδική έκθεση 2017* [National Preventive Mechanism Against Torture and Ill-Treatment - Annual Special Report 2017]. Athens: The Greek Ombudsman. Retrieved February 7, 2019, from www.synigoros.gr[in English].

The Greek Ombudsman. (2017b). *Ετήσια Έκθεση του Συνηγόρου του Πολίτη για το έτος 2017* [The Greek Ombudsman - Annual Report 2017]. Athens: The Greek Ombudsman. Retrieved February 7, 2019, from https://www.synigoros.gr/resources/annual_report_2017_site.pdf.

The Greek Ombudsman. (2018). *Ειδική Έκθεση 2017 για την Ίση Μεταχείριση*[Equal treatment - Special report 2017]. Athens: The Greek Ombudsman. Retrieved February 7, 2019, from www.synigoros.gr [in English].

The Hellenic League for Human Rights (2014, November 27). Children in cages: there is no end to the shame. [Weblog post]. Retrieved February 7, 2019, from <https://www.hlhr.gr/en/children-in-cages-shame/>.

The National Institute for Occupational Safety and Health. (2019). Crisis Development Stages. Retrieved February 8, 2019, from https://www.niosh.gov/wpvhc/Course.aspx/Slide/Unit7_5.

Tsiropoulou, Jenny. (2017, September 12). They could laugh and talk; they could have a life! [Weblog post]. Retrieved February 7, 2019, from <https://www.thepressproject.gr/article/116646/They-could-laugh-and-talk-they-could-have-a-life>.