



**Greek National Commission for Human Rights (GNCHR)**

**GNCHR contribution  
to the 2026 Thematic Report on Gender Equality, the Digital  
Space and the Age of Artificial Intelligence  
of the UN Working Group on discrimination against women  
and girls**

**October 2025**



*The Greek National Commission for Human Rights (GNCHR) is the independent advisory body to the Greek State on matters pertaining to human rights protection and the National Human Rights Institution (NHRI). It was established with Law 2667/1998 in accordance with the UN Paris Principles and is governed by Law 4780/2021. Its members are persons appointed by twenty institutions (independent Authorities, third level trade unions, NGOs, universities and research institutions)*

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**of the UN Working Group on discrimination against women and girls**

## **I. Introduction**

The Greek National Commission for Human Rights (GNCHR) responds to the [call for inputs](#) issues by the UN Working Group on discrimination against women and girls on the Thematic Report on Gender Equality, the Digital Space and the Age of Artificial Intelligence.

## **II. The GNCHR and its work on gender equality, artificial intelligence and new technologies**

The Greek National Commission for Human Rights (GNCHR) was established by Law 2667/1998 as the independent advisory body to the Greek State in accordance with Paris Principles (General Assembly Resolution A/RES/48/134, 20.12.1993) and is the NHRI in Greece. The founding legislation of the GNCHR was amended by [Law 4780/2021](#), the provisions of which now govern the operation of the Greek National Commission. Under these provisions, the GNCHR has acquired legal personality, functional, administrative and financial independence. Since 2001, the GNCHR, was accredited as an A' status NHRI by the competent GANHRI Sub – Committee on Accreditation, in recognition of its substantial independence and effective fulfillment of its role. The last re-accreditation took place in November 2024. The GNCHR's work on [gender equality](#) and [artificial intelligence](#) can be found in its [website](#).

## **III. The GNCHR input on gender equality, the digital space and artificial intelligence**

The GNCHR recalls the crucial importance of gender equality and AI and closely monitors developments at the level of international, European and national legislation, as well as the practical implementation. The input has been provided based on the main categorization of questions of the call for inputs and given the word limit.

## 1. General: Women's & Girls' Rights in an Era of New and Emerging Technology

Digital technologies and AI create both opportunities (access to information, new ways to mobilize) and serious harms (surveillance, gendered online abuse, biased algorithmic decision-making). In Greece these dynamics are visible in legal and enforcement actions, evolving legislation on gender-based online harms, data centers projects, and emerging debates about algorithmic bias. A rise of 4.6 points in the Gender Equality Index<sup>1</sup> was recorded by Greece from 2020 until today according to data published by the European Institute for Gender Equality (EIGE). Although Greece still occupies the last positions and specifically the 24th position, in recent years it has seen one of the largest rises among the member states.

The GNCHR through its work on gender equality and AI has indicated the challenges and the immediate steps that should be taken. The National Commission has engaged with the UN system in several occasions in order to promote gender equality and the safeguards in the context of the digital era and AI. The GNCHR has participated in the UNESCO Expert Roundtable for AI Supervisory Authorities in September 2025<sup>2</sup>, while the importance of the UNESCO Recommendation on the Ethics of AI was promoted by the GNCHR as part of a seminar on AI<sup>3</sup>.

The GNCHR has indicated several risks regarding gender equality, the digital space and AI in its [Report on the Status of Women in Greece](#) (2025), by: 1) calling upon the State to: i) assess the impact of AI systems on gender-based discrimination, and ii) ensure, through clear safeguards and targeted measures, that in their implementation, AI systems will neither perpetuate nor reinforce existing gender inequalities in the new labour market, as shaped by automation and digital transformation, 2) promoting gender equality in the digital world through capacity building, based on the findings of UNESCO's reports. Further, it must be effectively ensured in practice that digital transformation and automation will serve as an opportunity rather than as an additional barrier for women with disabilities.

Regarding the existing legal and policy frameworks, the following can be noted:

According to the [announcement of the Greek Ministry of Digital Governance](#) (2024), the Ministry, within the framework of the EU AI Act, published the list of national authorities that enforce or supervise compliance with EU obligations to protect fundamental rights. The GNCHR was included in this list along with the other three independent authorities. The relevant legislation based on the Regulation is anticipated.

Through our work and activities on AI, the GNCHR has identified best practices and challenges related to national and international regulation of AI. The GNCHR is under a process of gathering the different aspects of opportunities, challenges and feedback on AI based on its mandate and present its findings till the beginning of 2026 on several

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<sup>1</sup> GNCHR, [Rise of Greece in the EIGE Gender Equality Index](#), 26 October 2023.

<sup>2</sup> GNCHR, [GNCHR at the UNESCO Expert Roundtable for AI Supervisory Authorities](#), 3 October 2025.

<sup>3</sup> GNCHR, [The GNCHR Educational Seminar Series "The Next Day of Human Rights" has successfully started](#), 30 September 2025 (in Greek).

issues referred in the call for inputs. This will also include the thematic approach of gender.

At regional level, the GNCHR follows and participates in the [Artificial Intelligence Working Group](#) of the [European Network of National Human Rights Institutions \(ENNHRI\)](#) with input on updates, questionnaires, comments and drafting of common ENNHRI statements. Based on this cooperation and network, there are transnational effects of AI on women's and girls' rights, given the similar challenges in all countries, but also the impact of certain technologies that cross borders.

The 2024 policy report on “A Blueprint for Greece's AI Transformation”<sup>4</sup> drafted by the High-Level Advisory Committee on AI, as an [Advisory Body to the Prime Minister](#). Besides, the [Law 4961/2022](#) (Official Journal A' 146/2022) on Emerging information and communication technologies, strengthening digital governance and other provisions include, among others, provisions for the regulation of the development of AI and the ethical use of data.

## ***2. Women's Leadership in Political, Economic, Social and Cultural Rights***

The issues under question no. 4 can have an impact on women's leadership and public participation<sup>5</sup>. As it was noted by EIGE, withdrawal from having an online presence, also called the ‘silencing effect’, results in women and girls not openly participating to debates online, while it can impact participation in government, the media and other public-facing careers, with women choosing not to stand for re-election or stay in their current role<sup>6</sup>. On the other hand, [investments in data centers in Greece](#) and AI-sector expansion create job opportunities but require active policies to include women.

The GNCHR has reported the risks of AI and digital transformation on women's rights through its [Report on the Status of Women](#) and as noted above, a GNCHR report on AI reflecting, among others, on AI's impact on women's participation will be published in the following months. The work of KETHI, as mentioned below, is important on conducting targeted research. Though there is a need to fill the gaps of statistics reporting on how AI affects marginalized women (e.g. migrants and refugees, Roma, women with disabilities). There are media references of examples of deepfakes, image manipulation and targeted harassment. [The Director of Police's Department for Electronic Crime, Mr. Vassilis Papakostas, noted in the press that the deepfake incidents have mostly to do with pornography, revenge porn or sexual blackmail and coercion, that from April 2023 to January 2024 police arrested minors at three schools because of images they had created using photos of their female classmates and that there has also been photo manipulation involving politicians.](#)

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<sup>4</sup> High-Level Advisory Committee on AI, “A Blueprint for Greece's AI Transformation”, November 2024.

<sup>5</sup> European Parliament, [Cyberviolence against women in the EU](#), November 2024 and [EU Gender Equality Strategy 2020-2025](#).

<sup>6</sup> EIGE, [Combating Cyber Violence Women against Women and Girls](#), 2022, p. 52.

### ***3. Governance of AI and Content Moderation of AI Generated Content***

The Law 4961/2022, as noted above, is the main existing legal framework on the obligations on the use of AI by public bodies, transparency, obligations of contractors of AI systems, algorithmic impact assessment. Gender considerations can be taken into consideration under this framework. Greece's national AI strategy, as noted above, set priorities for AI adoption and ethics, including a certain approach to gender. The EU instruments and the EU AI Act are part of this framework. Thus, there are general obligations on standards for the procurement and use of AI systems in the public sector, but a more specific approach of gender-responsive standards for the procurement could be crucial in order to identify certain gaps and good practices. The redress mechanisms for AI harms affecting women and girls can include the work of the Greek Ombudsperson, the Hellenic Data Protection Authority, which handles complaints about unlawful processing. The challenges appear also under the EU Digital Services Act (DSA) and [Law No. 5099/2024](#).

### ***4. Technology facilitated Gender Based Violence***

The [Ministry of Social Cohesion and Family](#) has indicated several related aspects on its [report on gender equality policies](#), including the cyberspace, based on the thematic areas of the Beijing Platform for Action. Similar aspects have been noted by the [Research Centre for Gender Equality in its 2024 report on Cyber Violence Against Young Women](#) indicating the good practices for facing cyberspace violence and the findings of a survey, according to which 59.3% of women have experienced online violence, 40.5% of women have experienced one form of online violence, while 59.5% have experienced more than one, which illustrates the multiplicity of the phenomenon and the interconnection of the forms of online violence.

The GNCHR reiterated the [CEDAW's General Recommendation No. 35](#), according to which gender-based violence occurs in all spaces and spheres of human interaction, including the redefinition of public and private through technology-mediated environments. The GNCHR draws the attention of the State to [GREVIO's General Recommendation No. 1 on the digital dimension of violence against women](#), which requires States Parties to create the necessary legal and policy framework covering all forms of violence against women including activities carried out with the use of technology and communication equipment, despite the fact that the Istanbul Convention does not make explicit reference to cyberviolence against women. [GREVIO in its, Evaluation Report on Greece](#), taking into account the significant increase in cyber violence against women including online hate speech, image-based abuse, online stalking and online sexual harassment, particularly welcomed the criminalization of the offence of non-consensual dissemination of images of a sexual nature (Article 38 of Law 4947/2022 Revenge pornography - Article 346 of the Criminal Code). The new provision defines image-based sexual abuse as a separate offence against sexual freedom in Greece

and criminalizes the dissemination of personal images or material without the consent of the person depicted. The EIGE 2022 report<sup>7</sup> refers to Greece as well.

### 5. Labor and the Rights of Women and Girls

As a general approach on the labour context, according to the Hellenic Statistical Authority, 24.0% of women work (or have worked) in jobs with requirements lower than their educational level, whereas the corresponding percentage for men is 20.3%<sup>8</sup>. According to EUROSTAT, the share of employed persons with an ICT education by sex in 2024 in Greece was the following: men: 72,5%, women: 27,5%<sup>9</sup>, while the individuals' level of digital skills was 75,05% for men and 84,04% for women<sup>10</sup>.

Despite the fact that the European Declaration on Digital Rights and Principles for the Digital Decade promoted a digital transformation that leaves nobody behind in order to achieve gender balance, the percentages for women and girls and their participation in labor market is of outmost importance. There is a need to close the gender gap by making way for female talent and digital jobs attractive and accessible for young people. The [Greek National Coalition for Digital Skills and Jobs](#) can be a good practice, as a cooperation platform between various entities, which seek to promote digital skills.

The GNCHR, in its [Report on the Status of Women](#), has noted that the fact is that digital tools have increased efficiency and flexibility for employers and workers, but have also led to a “constantly on-call” mentality, with employees accessible at any time, including hours out of work. To the question of whether teleworking leads to gender equality and work-life balance, evidence shows that gender inequalities have not decreased, i.e. the need to achieve a more equitable distribution between work and unpaid care between women and men still remains.

The Greek Law No. 4808/2021 on the protective framework for platform workers<sup>11</sup> is related to digital jobs for women and young people and social rights under the specific call for inputs, based on a step forward towards gender equality, especially from the work-life balance perspective, as online platforms seem to provide women with a link to the labour market that can potentially prevent a withdrawal from the labour force during different life stages<sup>12</sup>. The State should create corresponding social protection in which platform workers can be included and benefit from and address the legal uncertainty in the employment status of platform workers.

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<sup>7</sup> EIGE, [Combating Cyber Violence Women against Women and Girls](#), 2022, pp. 25-28.

<sup>8</sup> Hellenic Statistical Authority, [Survey on Young People in the Labour Market 2024](#), 23 October 2025.

<sup>9</sup> EUROSTAT, [ICT education – a statistical overview](#), April 2025.

<sup>10</sup> EUROSTAT, [Young people with at least basic digital skills by gender](#), 2023.

<sup>11</sup> Eurofound, [Greek Law no. 4808/2021: protective framework for platform workers](#) (Legislation), Record number 2445, 2021. ELA, [Regulating digital platforms](#), May 2024.

<sup>12</sup> EIGE, [Gender differences in motivation to engage in platform work](#), 2023.

There are several references and recommendations related to AI and the labor sector in Greece in the [Report on the Future of Labor and Skills in Greece 2024-2030](#) with the support of the [Special Secretariat of Foresight of the Presidency of the Government](#).

### **6. Privacy, Autonomy, and Non-Discrimination**

In terms of privacy, by [Decision No 35/2022](#), the HDPa examined a complaint against Clearview AI Inc, lodged by the civil nonprofit organization “[Homo Digitalis](#)” on behalf of a complainant, who claimed that she was not satisfied in relation to the right of access she exercised before the aforementioned company, sent Clearview AI Inc. an order to delete the personal data of those subjects located in Greece, which the defendant collects and processes using those methods and fined the company. There is a need to continue robust enforcement and require privacy impact assessment that explicitly consider risks for gender.

Further, the HDPa decided by [Decision No 13/2024](#) on a fine to Greek Ministry of Migration and Asylum on violations on data protection impact assessment and data controller’s obligations for the border management systems Kentauros and Hyperion<sup>13</sup>, which include issues on data of vulnerable individuals, including women and girls.

The HDPa has also announced an investigation into the legality of the DeepSeek AI application in Greece<sup>14</sup>.

### **7. Availability of Disaggregated Data**

The GNCHR, through the [Racist Violence Recording Network](#) and the [Recording Mechanism of Informal Forced Returns](#), monitors, records and reports racist acts of violence and informal forced return incidents of third country nationals. Both mechanisms treat relevant data based on gender.

Sources of disaggregated data can be the following:

- [Eurostat on Digital Economy and Society](#) and
- the [EU Digital Skills and Jobs Platform](#) publishing data on Greece’s indicators disaggregated by gender and age.
- Statistics from the [Hellenic Statistical Authority](#)
- [EIGE](#) databases on gender equality
- [GREVIO](#) reports and data, based on country monitoring and evaluation
- [KETHI](#) – Greek Research Centre for Gender Equality
- The [Hellenic Data Protection Authority](#) for issues related to data, but also to AI

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<sup>13</sup> EDRI, [Greek Ministry of Migration and Asylum face a record-breaking €175,000 fine for the border management systems KENTAUROS & HYPERION](#), 17 April 2024.

<sup>14</sup> HDPa, [HDPa investigation of AI application and spyware](#), 2025.

The main gaps can focus on the fact that the systematic, standardized data on technology facilitated gender based violence is incomplete and inconsistent. Further, there is a limited disaggregation by socioeconomic status, migrant status and disability. Any national surveys should be more systematic and focus on the relevant issues but also consider the intersectional approach in order to add the findings in the policy design and enforcement. There is sparse data on AI bias on women in labor market, which can cause persistence in discriminatory practices. The lack of data can lead to poorly targeted policies or legal reforms, given that the AI impact changes the legal and societal framework for women and girls. A main aspect is the invisible intersectional harms and the connection among different vulnerabilities and profiles.

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