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RULE OF LAW REPORT

2025



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GREECE

FOREWORD

This country report is part of the Liberties Rule of Law Report 2025, which is the sixth annual report on the state of rule of law in the European Union (EU) published by the Civil Liberties Union for Europe (Liberties). Liberties is a non-governmental organisation (NGO) promoting the civil liberties of everyone in the EU, and it is built on a network of national civil liberties NGOs from across the EU. Currently, we have member organisations in Belgium, Bulgaria, the Czech Republic, Croatia, Estonia, France, Germany, Hungary, Ireland, Italy, Latvia, Lithuania, Malta, the Netherlands, Poland, Romania, Slovakia, Slovenia, Spain and Sweden, as well as a contributing partner organisation in Greece.

Liberties, together with its members and partner organisations, carries out advocacy, campaigning and public education activities to explain what the rule of law is, what the EU and national governments are doing to protect or harm it, and gathers public support to press leaders at EU and national level to fully respect, promote and protect our basic rights and values.

The 2025 report was drafted by Liberties and its member and partner organisations, and it covers the situation during 2024. It is a ‘shadow report’ to the European Commission’s annual rule of law audit. As such, its purpose is to provide the European Commission with reliable information and analysis from the ground to feed its own rule of law reports, and to provide an independent analysis of the state of the rule of law in the EU in its own right.

Liberties’ report represents the most in-depth reporting exercise carried out to date by an NGO network to map developments in a wide range of areas connected to the rule of law in the EU. The 2025 report includes 21 country reports that follow a common structure, mirroring and expanding on the priority areas and indicators identified by the European Commission for its annual rule of law monitoring cycle. Over forty member and local partner organisations contributed to the compilation of these country reports.

[Download the full Liberties Rule of Law Report 2025 here.](#)

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GREECE

ABOUT THE AUTHORS

Inter Alia



Inter Alia is a civic non-profit organisation based in Athens and working transnationally since 2013. Inter Alia brings together concerned citizens, civil society actors, activists, social scientists, artists and community organisers in activities in the fields of political education, research, activism, advocacy and arts. The organisation aims to promote transformative civic action across borders, community empowerment and personal emancipation and development.

KEY CONCERNS

Justice System

The justice system in Greece in general faces longstanding challenges with its overall effectiveness, efficiency and quality. The level of perceived judicial independence in Greece continues to decline among the general public. A legislative provision was adopted, partially implementing the recommendation to address the need for involvement of the judiciary in appointments to the highest positions in the judiciary.

A legislative provision was adopted, partially implementing the recommendation to address the need for involvement of the judiciary in appointments to the highest positions in the judiciary.

Anti-Corruption Framework

Law 5090/2024 constitutes an attempt of the Greek legislature to comply with international standards and particularly with the Organisation for Economic Co-operation and Development (OECD) Convention on Combating Bribery, and Greece has generally been commended for promoting legislation against corruption. However, the lack of enforcement and the lack of actual convictions in criminal cases corroborate what is still widely perceived as a pretextual policy, and Greece ranks first in the EU in corruption perception.

Law 5090/2024 constitutes an attempt of the Greek legislature to comply with international standards and particularly with the

Organisation for Economic Co-operation and Development (OECD) Convention on Combating Bribery, and Greece has generally been commended for promoting legislation against corruption. However, no further progress was made on stepping up efforts to establish a robust track record of prosecutions and final judgments in corruption cases, including high-level corruption.

Media Environment and Media Freedom

Greece faces significant challenges in media and telecommunications regulation, ownership transparency, press freedom, and journalist safety. Political influence, resource constraints, and concentrated ownership hinder media pluralism and independence. Despite modest gains, transparency, anti-SLAPP progress, and reforms under EU frameworks remain limited.

Checks and Balances

Independent authorities in Greece face challenges to their autonomy, notably political pressures and reduced powers, as seen in conflicts with the Hellenic Authority for Communication Security and Privacy after the wiretapping scandal. Legislative processes lack transparency, and access to public information is hindered by complexity, despite fair electoral practices.

Civic Space







The shrinking of civic space has become a worrying trend in the country in recent years, including restrictive CSO regulations, SLAPPs targeting activists, police violence

against peaceful assembly, and legal harassment of human rights defenders. Persistent surveillance and data privacy violations compound these challenges, despite some positive judicial rulings. On a positive note, Greece legalised same-sex marriage, marking a significant advancement for LGBTQ rights and inclusion.

Disregard of Human Rights Obligations and Other Systemic Issues Affecting the Rule of Law Environment

In a landmark decision, the European Court of Human Rights (ECtHR) condemned Greece for the first time for a pushback incident at the Evros River border. The case concerned the forcible return of asylum seekers to Turkey without due process, violating their fundamental rights. This decision sets a significant precedent, shedding light on the persistent issue of pushbacks at European borders.

State of play (versus 2024)

-  Justice system
-  Anti-corruption framework
-  Media Environment and Media Freedom
-  Checks and balances
-  Civic Space
-  Human Rights

Legend

Regression **No progress** **Progress**



JUSTICE SYSTEM

Key recommendations

- *The Ministry of Justice should conclude the operation of the Office for the Collection and Processing of Judicial Statistics, and provide statistics accordingly.*
- *The Ministry of Justice should adopt practical measures (staffing, digitalisation etc.) in order to speed up the length of proceedings before courts, especially civil courts.*

Judicial independence

The level of perceived judicial independence in Greece continues to decline among the general public. Overall, 40% of the general population perceive the level of independence of courts and judges to be ‘fairly or very good’ in 2024, while 56% of the general population perceive it as being ‘fairly or very bad’. The perceived judicial independence among the general public has significantly decreased in comparison with 2023 (46%), as well as in comparison with 2020 (53%).¹

The 2023 Rule of Law Report had recommended that Greece “take steps to address the need for involvement of the judiciary in the appointment of President and Vice President of the Council of State, the Supreme Court and the Court of Audit taking into account European standards on judicial appointments”. In July 2024, Parliament voted on a legislative proposal to involve the administrative plenaries of the three highest courts in the procedure leading to the appointment of their Presidents and Vice Presidents. According to the adopted provision, the Minister of Justice requests the opinion of the plenary of the relevant highest court, which in turn, votes by secret ballot for up to five candidates for the position of the President. It has to be noted that the opinion is not binding and that the Council of Ministers can select any candidates it wishes, after consulting the Conference of Presidents of Parliament and upon a proposal from the Minister for Justice. This legislative amendment has also

1 European Commission, EU Justice Scoreboard 2024 shows that perception of judicial independence has improved, Press Release, 11 June 2024, https://ec.europa.eu/commission/presscorner/detail/en/ip_24_3164.

been criticised for lack of prior consultation with the Plenaries of these Courts.²

The Supreme Court formally reacted to a resolution of the European Parliament (EP) on the rule of law and media freedom in Greece. The Court, sitting in Administrative Plenary (Διοικητική Ολομέλεια) format, recalled that judicial officials are bound by the rule of law and perform their functions in line with the Constitution. The decision, adopted by a majority, criticised the EP resolution, among others, for making sweeping statements without putting forward evidence and for engaging in impermissible interference in the work of the Member State's prosecution service and courts.³ The decision has been described as “unprecedented” by the President of the Plenary of Greek Bar Associations.⁴ A minority of 13 judges opposed the issuance of the decision

on the grounds that the Administrative Plenary of the Court has no competence to conduct an assessment of the European Parliament resolution, since the resolution does not constitute a legal issue falling within its competence.

Quality of justice

Digitalisation (e.g. use of digital technology, particularly electronic communication tools, within the justice system and with court users, including resilience of justice systems in COVID-19 pandemic)

Efforts to increase the level of digitalisation continue at a slow pace. The Office for the Collection and Processing of Judicial Statistics is not yet functional and lacks the necessary tools to produce better qualitative and quantitative statistics. The only statistical data currently

2 Union of Judges and Prosecutors, “Yes, but...” in the selection of the leadership of the Judiciary and with the participation of judges - Positions, comments and proposals, Nomiki Vivliothiki, 6 July 2024, <https://daily.nb.org/nomika-nea/enosi-dikaston-kai-eisangeleon-nai-men-alla-stin-epilogi-igesias-tis-dikaiosynis-kai-me-ti-symmetochi-dikaston-theseis-scholia-kai-protaseis-epi-tis-rythmisis-tou-ypourgeiou-dikai/>; Antonis Karampatzos, *Provision for the appointment of highest court judges*, TA NEA, 18 July 2024, <https://www.antoniskarampatzos.com/arthrografia-ston-typo/%CF%81%CF%8D%CE%B8%CE%BC%CE%B9%CF%83%CE%B7-%CE%B3%CE%B9%CE%B1-%CF%84%CE%B7%CE%BD-%CE%B5%CF%80%CE%B9%CE%BB%CE%BF%CE%B3%CE%AE-%CF%84%CF%89%CE%BD-%CE%B1%CE%BD%CF%89%CF%84%CE%AC%CF%84%CF%89%CE%BD-%CE%B4/>.

3 Supreme Court, Administrative Plenary Decision 2/2024, 15 February 2024.

4 Bar Association of Athens, *Δικαστική ανεξαρτησία – Τα όρια της κριτικής στη Δικαιοσύνη*, 23 February 2024, <https://www.dsa.gr/%CE%BD%CE%AD%CE%B1/%CE%B1%CE%BD%CE%B1%CE%BA%CE%BF%CE%B9%CE%BD%CF%8E%CF%83%CE%B5%CE%B9%CF%82/%CE%B4%CE%B9%CE%BA%CE%B1%CF%83%CF%84%CE%B9%CE%BA%CE%AE-%CE%B1%CE%BD%CE%B5%CE%BE%CE%B1%CF%81%CF%84%CE%B7%CF%83%CE%AF%CE%B1-%E2%80%93-%CF%84%CE%B1-%CF%8C%CF%81%CE%B9%CE%B1-%CF%84%CE%B7%CF%82-%CE%BA%CF%81%CE%B9%CF%84%CE%B9%CE%BA%CE%AE%CF%82-%CF%83%CF%84%CE%B7-%CE%B4%CE%B9%CE%BA%CE%B1%CE%B9%CE%BF%CF%83%CF%8D%CE%BD%CE%B7>.

accessible on the website of the Ministry of Justice are “statistics by jurisdiction” for civil, criminal and administrative proceedings; yet the data available appear to be patchy, inconsistent and incomplete.⁵

Geographical distribution and number of courts/jurisdictions (“judicial map”) and their specialisation

In May 2024, Parliament adopted the law reforming the judicial map in civil and criminal justice,⁶ in the face of the Plenary of Bar Associations’ objections⁷ to the reform’s scope and efficiency. According to CSOs, the “rushed” and “haphazard” manner in which the “reform” took place seems to be corroborated by the actions of the legislature, which proceeded to issue a series of amendments to its provisions within a short period of time after the adoption of the law.⁸

Other

In February 2024, the bill titled Acceleration and Qualitative Upgrading of Criminal Trials

- Modernisation of the Legislative Framework for the Prevention and Combat of Domestic Violence was adopted in the Parliament by members of the governing party, New Democracy, while all opposition parties voted against it. Civil society organisations, such as the Hellenic League for Human Rights, had strongly criticised the reform of the penal code highlighting that it would lead to the systematic tightening of sentences and the framework for serving and suspending sentences, resulting in increased imprisonment, the reduction of the rights of defendants and the arbitrary reduction in the quality of justice, which will cause a significant blow to the principle of a fair trial.⁹

Fairness and efficiency of the justice system

Greece has a very slow justice system, as delays in the judicial system continue to be a systemic problem; there are huge delays in the adjudication of cases, with new cases constantly piling up. According to the latest *CEPEJ Study on judicial systems - Greece country profile*,¹⁰ it takes 746 days to conclude a civil or commercial

5 Ministry of Justice, Statistical data, https://ministryofjustice.gr/?page_id=1603.

6 Law 5108/2024.

7 Civil Liberties Union for Europe, Rule of Law Report 2024 Country Chapter on Greece.

8 Joint CSO Report, Struggle for Accountability: the state of Rule of Law in Greece, January 2025, <https://vouli-watch.gr/resources/file/2025/2/4/724827b4-407c-419b-bed3-8913ded146d2.pdf>.

9 Hellenic League for Human Rights, *Written Memorandum on the draft law on the Criminal Code and the Code of Criminal Procedure*, 16 February 2024, <https://www.hlhr.gr/%cf%85%cf%80%cf%8c%ce%bc%ce%bd%ce%b7%ce%bc%ce%b1-%cf%80%ce%bf%ce%b9%ce%bd%ce%b9%ce%ba%cf%8c%cf%82-%ce%ba%cf%8e%ce%b4%ce%b9%ce%ba%ce%b1%cf%82/>.

10 CEPEJ Study on the judicial systems in the EU Member States - Country fiche Greece, <https://rm.coe.int/greece-eu-scoreboard-country-fiches-2022-data/1680b065f6>.

case issue in the first instance and 422 days in the second instance; 464 days to conclude an administrative issue in the first instance and 661 in the second instance; 223 days to conclude a criminal case issue in the first instance and 294 in the second instance. All disposition times are way higher than the EU average. The disparity between Greek judicial processing times and European median values is particularly stark in civil proceedings where cases take over three times longer to resolve compared to the European median, potentially undermining citizens' fundamental right to timely judicial protection.

CSOs also note that long waiting times are observed throughout all stages of judicial proceedings at the administrative courts, ie. delayed schedule of hearings, repeated postponement of hearings, and delayed delivery of decisions.

In general, and notwithstanding efforts made, the country has a very lengthy justice system with delays significant enough to jeopardise the rule of law. On a relevant note, for another

year, Greece faced several ECtHR judgments concerning the length of judicial proceedings.¹¹

In what has been considered an important decision showcasing the poor quality of judicial rulings,¹² in the Chamber's judgment dated 15.10.2024 in the case of *Nsingi v. Greece* (application No. 27985/19) the European Court of Human Rights held, unanimously, that there had been a violation of Article 5 §§ 1 and 5 (right to liberty and security/right to compensation) of the European Convention on Human Rights. The case concerned the rejection of the applicant's claim for compensation for having been imprisoned pursuant to a sentence that had been handed down in respect of a different person, for whom he had been mistaken at the time of his arrest.¹³

The Union of Greek Bar Associations expressed serious concerns about the Supreme Court Prosecutor's instructions/circular addressed to prosecution and interrogation services investigating the Tempe case, the deadliest train crash in Greece's history. A statement issued on 1 March 2024 highlighted that the issuance of such instructions is impermissible and

11 European Court of Human Rights, Statistical data, <https://www.echr.coe.int/statistical-reports>.

12 Vassilis Chirdaris & Panagiotis Tsimpoukis, *Greece, in addition to the delays, is also condemned for the lack of complete justification in its decisions*, Dikastiko, 25 November 2024, https://www.dikastiko.gr/articles/vasilis-cheirdaris-panagiotis-tsimpoykis-strasvoyrgo-i-ellada-pleon-ton-kathysteriseon-katadikazetai-kai-gia-elleipseis-panteloys-aitiologias-stis-apofaseis-tis/?fbclid=IwY2xjawHq48NleHRuA2FlbQIxMAABHds_6VS6d6bbm4b6r9Hs-Fj6JC7p0B3ZlurCtDhpWDyYLPm3XnGmXe4FgBg_aem_HhgKsyD5kr5E6x4XritHEw.

13 European Court of Human Rights, *Judgement concerning Greece*, 15 October 2024, <https://www.echr.coe.int/w/judgment-concerning-greece-5>.

problematic.¹⁴ Opposition parties participating in the parliamentary inquiry committee set up concerning the Tempe train crash have denounced the ineffectiveness of investigations, including failure to summon key witnesses to testify.¹⁵

In November 2024, reports noted that the audiovisual material that had been submitted to the Forensic Science Division (Διεύθυνση

Εγκληματολογικών Ερευνών, ΔΕΕ) of the Hellenic Police did not include footage of the loading and departure of the commercial train at the Thessaloniki train station. The Supreme Court Prosecutor ordered an urgent investigation into the reasons for this omission.¹⁶

Similar concerns had been raised in the parliamentary inquiry into the surveillance scandal.¹⁷

ANTI-CORRUPTION FRAMEWORK

Key recommendations

- *The Ministry of Justice should ensure actual enforcement of legislation and step up efforts to establish a robust track record of prosecutions and final judgments in corruption cases.*
- *The Hellenic Parliament should reform the appointment process for the National Transparency Authority (NTA) to ensure political neutrality, such as requiring cross-party approval for key positions and adherence to stricter constitutional safeguards for independence.*
- *The National Transparency Authority should expand the functionality and public accessibility of platforms for asset declarations, lobbying records, and gift registries.*

14 Joint Civil Society report, *Greece in Institutional Decline: 60-day update - Addendum to the Joint Civil Society Submission to the European Commission on the 2024 Rule of Law Report*, 11 March 2024, https://www.hlhr.gr/wp-content/uploads/2024/04/RoL2024_JointSubmission_CSO_Greece_Update-2.pdf.

15 Kathimerini, *Opposition walks out of parliamentary probe on Tempe train tragedy*, 20 February 2024, <https://www.ekathimerini.com/news/1232156/opposition-walks-out-of-parliamentary-committee-probing-tempe-train-tragedy/>.

16 Kathimerini, *Urgent investigation ordered into missing CCTV footage from Thessaloniki station*, November 2024, https://www.ekathimerini.com/news/1253812/urgent-investigation-ordered-into-missing-cctv-footage-from-thessaloniki-station/?utm_source=chatgpt.com.

17 Joint CSO Report, *Struggle for Accountability: the state of Rule of Law in Greece*, January 2025, <https://vouli-watch.gr/resources/file/2025/2/4/724827b4-407c-419b-bed3-8913ded146d2.pdf>.

Levels of corruption

According to the Special Eurobarometer,¹⁸ Greece ranks first in the EU in corruption perception, with 98% of the respondents considering corruption to be widespread in the country (EU average: 68%). The same report underlines that, “in Greece, perceptions of widespread corruption have been consistently high and above 95% since 2013”.¹⁹ Respondents believe that the giving and taking of bribes and the abuse of power for personal gain are widespread among: a. the healthcare system (89%), political parties (71%), politicians at national, regional or local level (68%), officials awarding public tenders (67%), officials issuing building permits (63%), inspectors (health and safety, construction, labour, food quality, sanitary control and licensing – 59%), tax authorities (57%), police, and customs (56%).

WJP *Rule of Law Index* measures the absence of corruption in government. The 2024 data places Greece on the 52th place in global rank, with a score of 0.57 (ie. a slight increase of +1

since the previous year). However, since forms of corruption are examined with respect to government officers in the executive branch, the judiciary, the military, police, and the legislature, it has to be noted that Greece scores fairly high in the judicial branch and military, but very low in the executive and legislative branch.²⁰

This widespread perception is generally corroborated by investigative reporting.

Indicatively, on September 2024, the authorities discovered the illegal use of 3,516 AMKA (i.e. social security) numbers, which resulted in 90,186 fake prescriptions being issued, with financial damage to the Greek insurance system being estimated at €3.5 million. A total of 17 people were arrested, including doctors, pharmacists, and a medical representative. Among the falsely prescribed medications were narcotics and other psychotropic substances, some of which are in shortage both in Greece and internationally.²¹

18 European Union, *Citizens' attitudes towards corruption in the EU in 2024* - Special Eurobarometer 548, February-March 2024, https://europa.eu/eurobarometer/surveys/detail/3217?fbclid=IwY2xjawHQzvpleHRuA2FlbQIx-MAABHYdu1cnQ5IgtTJCLvGO-Pm-8B-FrzkyYlhDP-R147L_fLvocmuCvYO7Dk7g_aem_knBhk4U-JyNoMWqsF5Nk3KA.

19 European Union, *Citizens' attitudes towards corruption in the EU in 2024* - Special Eurobarometer 548, February-March 2024, https://europa.eu/eurobarometer/surveys/detail/3217?fbclid=IwY2xjawHQzvpleHRuA2FlbQIx-MAABHYdu1cnQ5IgtTJCLvGO-Pm-8B-FrzkyYlhDP-R147L_fLvocmuCvYO7Dk7g_aem_knBhk4U-JyNoMWqsF5Nk3KA.

20 World Justice Project, Country Profile - Greece, <https://worldjusticeproject.org/rule-of-law-index/country/2024/Greece/Absence%20of%20Corruption/>.

21 Capital.gr, *Major fraud against EOPYY: Handcuffs to doctors and pharmacists for false prescriptions*, 16 September 2024, <https://www.capital.gr/epikairota/3867692/megali-apat-se-baros-tou-copuu-xeiropedes-se-giatrous-kai-farmakopoiious-gia-pseutikes-suntagografiseis/>.

Serious questions arise regarding the implementation of the Ministry of Environment and Energy's programme for electrical appliance recycling. The project, worth almost €300 million, was awarded to the company Appliance Recycling SA. According to the reporting, Appliance Recycling SA claimed more money than it was entitled to under the contract, even for costs of hundreds of thousands of euros incurred before it was awarded the project, and costs of hundreds of thousands of euros that were not foreseen. Also, Appliance Recycling SA directed, through direct awards or closed tenders, several million euros to third companies and individuals related to members of its Board of Directors.²²

The article from Reporters United exposes a coordinated effort by Greece's Ministry of Transport to absolve a consortium – comprising construction giants AKTOR, AVAX, and TERNA – and their insurers from a €13 million liability for damages caused by Storm Daniel in September 2023. Despite an active contract covering the affected Domokos Station, insured against natural disasters, the consortium ceased repairs in May 2024 and sought formal project completion acknowledgment. Internal documents reveal that OSE's CEO requested the removal of the damaged section

from the consortium's contractual obligations, paving the way for a new contract, potentially awarded directly to the same consortium, devoid of prior insurance responsibilities.²³

According to a report from Inside Story, a once-strong company on the Greek Stock Exchange, Lavrentis Lavrentiadis' Neochemicals, had accumulated debts of more than half a billion euros to banks, tax authorities, social security funds and companies before it was placed in special liquidation in 2012. The company was freed from debt burdens and seizures imposed by the Independent Public Revenue Authority, and in 2024 the new shareholder, linked to the old one, again acquired assets that have an objective value many times greater than the paltry price he paid, in this case just €4.14 million, and is setting up new business ventures.²⁴

Doubts have been raised about the "Digitalization of the Economic Diplomacy Network" project, which aims to "digitize the national economic diplomacy network" and "strengthen the digital capacity of Enterprise Greece", as stated in the tender announcement. The project is valued at €9.721 million, including VAT, and will be funded by the Public Investment Program. The contracting authority was identified as Information Society SA, with Enterprise

22 Danai Maragoudaki, Eliza Triantafyllou, *Ministry of Environment: the "big trick" with appliance recycling*, Solomon, 12 November 2024, <https://wearesolomon.com/el/mag/thematikh/logodosia-diafaneia/ypoyrgeio-perivallontos-to-megalo-kolpo/>.

23 Evridiki Bersi, *Tithorea-Domokos Consortium: the great escape of insurance companies and contractors*, Reporters United, 21 November 2024, <https://www.reportersunited.gr/14685/tempi-etaireies-apodراسi/>.

24 Eliza Triantafyllou, *Second life for Lavrentiadis' Neochemicals: banks and the State lose out*, Inside Story, 23 December 2024, <https://insidestory.gr/article/deyteri-zoi-gia-ti-neohimiki-toy-layrentiadi-hamanoi-trapezes-kai-dimosio>.

Greece as the project owner. However, according to a complaint submitted to Data Journalists, the new project involves implementing several components already in place at Enterprise Greece. In fact, Data Journalists' investigation, supported by official Enterprise Greece decisions published on the Diavgeia platform, shows that some of the components outlined in the tender have, in fact, already been completed. This raises questions about the total cost of the project and whether additional public funds are being spent unnecessarily.²⁵

Framework to prevent corruption

Integrity framework including incompatibility rules (e.g.: revolving doors)

The National Transparency Authority (NTA) oversees the implementation of the National Anti-Corruption Action Plan (NACAP) for 2022-2025. The legal basis of the National Transparency Authority in the Executive State Act foresees that candidates for the positions of Director and Management Board Members of NTA are proposed by the Council of Ministers and are approved by a simple majority vote of the Institutions and Transparency Committee of the Parliament. This means that a party holding a majority of seats in Parliament may approve a candidate solely through its own votes in the Committee. Accordingly, the selection procedure not only falls short of

the institutional requirements set by the Constitution for independent authorities but also raises risks of political dependency of the NTA on the government.

On incompatibility rules, Law No. 4622/2019 provides that for those persons appointed as members of the government and deputy ministers the exercise of any professional or business activity is automatically suspended. At the same time, it provides that members of the government must obtain for one year after their departure a licence from the Ethics Committee of the National Transparency Authority for any professional activity related to the activity of the body to which they were appointed, where a conflict of interest may arise.

However, the relevant legislative framework is not considered sufficient. According to GovWatch, GRECO's recommendation shows that the Council of Europe's leading anti-corruption body has considered that a more comprehensive legislative framework is needed for political consultants who already have a dependent employment relationship (either public or private) with the State, which highlights the need to adopt transparency, ethics and conflict of interest measures for private individuals. GovWatch has recently analysed the case of Professor Antonis Manitakis: "The Ministry of Education requested the scientific opinion of Mr. Antonis Manitakis on the constitutionality

25 Vangelis Triantis, *Enterprise Greece: Distributing millions for projects... Already completed in the past. Shadows and questions surround the "Digitalization of the Economic Diplomacy Network" project, with a budget of 9.721 million euros*, Data Journalists, 24 November 2024, <https://www.datajournalists.co.uk/2024/11/24/enterprise-greece-distributing-millions-for-projects-already-completed-in-the-past/>.

of the private universities bill. However, the constitutional expert is also an executive of the University of Nicosia who aspires to establish a medical school precisely thanks to the provisions of the same bill. The facts raise a conflict of interest issue in the absence of an effective legislative framework to combat conflicts of interest and revolving doors.”²⁶

General transparency of public decision-making (including public access to information such as lobbying, asset disclosure rules and transparency of political party financing)

The obligation to submit asset declarations (Πρόθεν Έσχες) aims to enhance transparency and democracy and is a key tool in preventing corruption. Submission of these declarations by those obliged (governments, MPs, MEPs and other public officials) and their scrutiny by the appropriate bodies allows for determining the assets held by those in positions of power and their origins. In 2024, the new platform for the submission of asset declarations, which was developed in the framework of Law 5026/2023, started operating. The platform automates the process by using data from financial institutions, allows for separate filing of returns by spouses and enhances

transparency by facilitating pre-populated data for those obliged to submit.

Lobbying legislation obliges high-level officials with executive and legislative functions to declare their contacts with lobbyists and also mandates the setting up of a lobby register, which has been operational since December 2022. However, the actual registrations are negligible (currently 34 registrations vs 20 registrations cited by the EC report), while the report with statistical data concerning the operation of the Registry for the calendar year 2023 has not yet been published by the NTA.²⁷

CSOs have raised a number of issues with regard to the scarce data that exist in the Transparency Register, such as a) the existence of several interest representatives that have not submitted an annual declaration, b) general/incomplete reporting of the intended result, c) incomplete records, d) inconsistencies between declarations by interest representatives and declarations by institutional actors, and e) sections without content on the Registry website.²⁸

26 Thodoris Chondrogiannos, *Conflict of interest: The case of the constitutional expert Antonis Manitakis*, GovWatch, 18 May 2024, <https://govwatch.gr/en/finds/zitima-sygrokroysis-symferontos-i-periptosi-toy-syntagmatologoy-antoni-manitaki/>.

27 National Transparency Authority, Statistical data, <https://lobbying.aead.gr/?p=91>.

28 VouliWatch, *National Transparency Authority's "Response" on the Implementation of the Lobbying Law*, 18 December 2024, <https://vouliwatch.gr/actions/article/lobbying-apantisi-ead>.

Measures in place to ensure whistleblower protection and encourage reporting of corruption

In June 2024, Greece presented its Phase 4 written follow-up report to the OECD Working Group on Bribery (Working Group). The report outlined Greece's efforts to implement the 49 recommendations and to address the follow-up issues identified during its Phase 4 evaluation in March 2022. In light of the information provided, the Working Group concluded that Greece has fully implemented 23 recommendations, partially implemented 15 recommendations, and not implemented 11 recommendations.

More specifically, regarding detection, Law 5095/2024 amended the Whistleblower Protection Law to include bribery offences under its material scope, extending its protections to whistleblowers reporting all forms of foreign bribery. On enforcement, Law 5090/2024 addressed longstanding issues regarding the foreign bribery offence. The aforementioned laws also amended the Code of Criminal Procedure to ensure that the new Economic Crimes Prosecutor possesses the authority to both investigate and prosecute foreign bribery cases. This helps protect prosecutors' ability to specialise and avoids delays and redundant efforts in handling foreign bribery cases.

Greece has also taken several measures to raise awareness among prosecutors and investigative judges to ensure that foreign bribery investigations and prosecutions are not influenced by considerations forbidden under Article 5 of the Convention.

While acknowledging these positive developments, the Working Group expressed its regret that Greece has not fully addressed concerns expressed in previous evaluation phases. These include clarifying what amounts to adequate supervision and control to prevent foreign bribery.²⁹

An October 2024 decision by the Financial Prosecutor's Office to revoke the protection status of two key whistleblowers in a case involving government officials, politicians and the pharmaceutical industry represents a significant setback for whistleblower protection in Greece. This decision was made following requests by political figures implicated in the case. The decision raises profound concerns about the future of whistleblowing in Greece.³⁰

On a relevant note, VouliWatch has submitted to the National Transparency Authority a Request for Information requesting how many public and private sector entities have complied by November 2024 with the obligations to establish internal reporting channels and what

29 OECD, *Implementing the OECD Anti-Bribery Convention Phase 4 Report Two-Year Written Follow-Up Report: Greece*, OECD Publishing, Paris, 2024, <https://doi.org/10.1787/a3c117d5-en>.

30 Kathimerini, 'Novartis: Στο εδώλιο οι πρώην προστατευόμενοι μάρτυρες – Δίωξη για δύο πλημμελήματα', 20 January 2025, <https://www.kathimerini.gr/politics/563425975/novartis-sto-edolio-oi-proin-prostateyomenoi-martyres-dioxi-gia-dyo-plimmelimata/>.

the percentage of entities is that have not yet complied.³¹ No reply has been received yet.

Any other relevant measures to prevent corruption in public and private sector

The National Transparency Authority decided to accept an appeal filed by Vouliwatch and grant the requested lists of gifts to the members of the Government and the Deputy Ministers under Law 4829/2021, by publishing and posting them on the website of the Presidency of the Government, in a place extremely difficult to locate.³² The published list is patchy and far from complete.³³ The relatively small number of entries in the list may raise doubts as to the sound implementation of the relevant law. In particular, as analysed by VouliWatch, the recipients of a total of 25 gifts are only four individuals: the Prime Minister, two Ministers of Foreign Affairs, and the Minister of Tourism, with the majority of the gifts being given to the Prime Minister. The number of declared and published gifts to members of the Government and Deputy Ministers – just 25 – seems disproportionately small considering

that the government is currently comprised of the Prime Minister along with 60 ministers, alternate ministers and deputy ministers. Furthermore, this registry covers a two year period (2022 and 2023). Notably, during the same timeframe, the President of the Republic alone declared a total of 85 gifts, more than three times the number declared by the 61 members of the government combined.³⁴

Investigation and prosecution of corruption

The OECD two-year follow-up report expressed, once more, concerns about Greece's poor track record of the enforcement of the Anti-Bribery Convention and the lack of convictions with sanctions for foreign bribery, underlining that “despite significantly increasing fines against natural persons for the main foreign bribery offence, longstanding concerns over their effectiveness, proportionality, and dissuasiveness remain. Such concerns are aggravated by the absence of foreign bribery convictions against natural and legal persons, which makes it impossible for the Working

31 VouliWatch, *2 years of the Whistleblowers Law: where is its implementation?*, 22 November 2024, <https://vouliwatch.gr/actions/article/whistleblowers-ead>.

32 VouliWatch, *Gifts for politicians*, 11 April 2024, <https://vouliwatch.gr/actions/article/dora-kyvernisis-prosfygi-ead>.

33 Presidency of the Government of Greece, *Online Gift Catalogue*, <https://govpresidency.gov.gr/%CE%B4%CF%81%CE%B1%CF%83%CF%84%CE%B7%CF%81%CE%B9%CF%8C%CF%84%CE%B7%CF%84%CE%B5%CF%82-2/%CE%B7%CE%BB%CE%B5%CE%BA%CF%84%CF%81%CE%BF%CE%BD%CE%B9%-CE%BA%CF%8C%CF%82-%CE%BA%CE%B1%CF%84%CE%AC%CE%BB%CE%BF%CE%B3%CE%BF%CF%82-%CE%B4%CF%8E%CF%81%CF%89%CE%BD/>.

34 Joint CSO Report, *Struggle for Accountability: the state of Rule of Law in Greece*, January 2025, <https://vouliwatch.gr/resources/file/2025/2/4/724827b4-407c-419b-bed3-8913ded146d2.pdf>.

Group to assess whether sanctions are effective, proportionate, and dissuasive in practice.”³⁵

The OECD Working Group remains seriously concerned about this lack of enforcement, while recognising that the benefits of the new changes to the legal framework will take time to be evident. The OECD Working Group also underlines that “ongoing investigations and prosecutions have stalled since the adoption of the Phase 4 report. Furthermore, Phase 4 concerns regarding resources available for prosecutors and investigative judges remain.

Since Phase 4, the status of foreign bribery enforcement as reported by Greece is the following:

- Of the five cases that were ongoing at the time of the adoption of the Phase 4 report, three have been terminated without charges [Cypriot PEP case, Greek intermediary case, and Water and sewage consortium case].

- One case has been terminated without charges due to the expiry of the limitations period. This case was affected by the downgrade of the foreign bribery offence from felony to misdemeanour in 2019 [Greek intermediary case].
- Two cases have shown little or no progress [Highway construction case and Greek shipping companies case]. The Highway construction case has been in the prosecution stage for over five years with barely any progress. The Greek shipping companies case has been stalled for over two years pending the translation of documents received through MLA requests.
- On a positive note, Greece has launched three new foreign bribery investigations since the adoption of the Phase 4 report. One has been terminated and the other two are at the preliminary examination stage.”³⁶

35 OECD, *Implementing the OECD Anti-Bribery Convention Phase 4 Report Two-Year Written Follow-Up Report: Greece*, OECD Publishing, Paris, 2004, <https://doi.org/10.1787/a3c117d5-en>.

36 Ibid.

MEDIA ENVIRONMENT AND MEDIA FREEDOM

Key recommendations

- *The implementation of the European Media Freedom Act offers a framework for potential improvements, but tangible progress will require substantial reforms from competent ministries and a commitment to upholding media independence.*
- *The Greek parliament should amend national legislation to incorporate assessments of media pluralism when evaluating mergers and acquisitions in the media sector. It should also establish stricter disclosure requirements for beneficial ownership of media outlets and enforce timely updates to ownership registries.*
- *The Greek parliament should expedite the transposition of the EU Anti-SLAPP Directive into national law, providing clear procedural safeguards and remedies for journalists. The Ministry of Justice should strengthen protections for journalistic sources and enforce stricter penalties for attacks on journalists.*
- *The Ministry of Digital Governance and the General Secretariat for Information and Communication should strengthen independent oversight bodies to monitor the distribution of state funds to media outlets, ensuring compliance with transparency standards.*

Media and telecommunications authorities and bodies

The National Council for Radio and Television (NCRTV) and the Hellenic Authority for Communication Security and Privacy (ADAE) are pivotal in regulating Greece's media landscape. However, their independence has been questioned due to political influences in member appointments. Also, both NCRTV and ADAE reportedly face resource constraints,

hindering their ability to effectively oversee and enforce media regulations.³⁷

Despite the National Council for Radio and Television (NCRTV) status as an independent authority, its members are selected by a parliamentary committee where the ruling party holds a majority. This makes the selection of NCRTV members susceptible to political influence. Furthermore, the Council's limited financial resources and understaffing present significant challenges for its members and

37 Freedom House, Country Overview – Greece, <https://freedomhouse.org/country/greece/freedom-world/2024>.

management in carrying out their duties and achieving their objectives.³⁸

The procedure followed for the appointment of the new members of the NCRTV in September 2023 had raised concerns among civil society, journalists, and legal experts and was perceived as an attempt to interfere with its independence; consequently, in July 2024, the hearing of the related petitions of annulment submitted by the Athens Bar Association took place in the Plenary Session of the Council of State.

In November, the Council of State ruled that the Athens Bar Association lacked the legal interest to stand as a party of litigation in the annulment of the decisions regarding the appointment of the President, the Vice President and six members of the National Broadcasting Council. The Athens Bar Association protested the decision and underlined that the Court has avoided ruling on the substance of the cases.³⁹

The EMFA, effective from May 2024, aims to enhance media freedom and pluralism across the EU. In Greece, it has prompted discussions on reforming national media laws to align with EU standards. However, tangible changes in the regulatory framework and improvements in media freedom are yet to materialise.⁴⁰

Pluralism and concentration

The number of media outlets in Greece is large and the landscape is diverse. However, the ownership of major media groups is concentrated among a handful of influential business owners with interests also in other sectors of the economy. Thus, the landscape for private media ownership is characterised by a small number of wealthy and politically connected families with extensive cross-ownership interests in key sectors, often reliant on public contracts from the government. The dominant force of media ownership in Greece is now composed of shipowners and major investors in the industry.⁴¹

38 Danai Maragoudaki, Media Capture Monitoring Report: Greece measuring compliance with the European Media Freedom Act, International Press Institute, November 2024, <https://ipi.media/wp-content/uploads/2024/11/Greece-Media-Capture-Monitoring-Report-1.pdf>.

39 Athens Bar Association Press Release, *Decisions of the Plenary Session of the CoE: Historically important legal regression. Announcement of the Coordinating Committee of the Plenary of the Presidents of the Greek Bar Associations*, *Lawpost*, 12 November 2024, <https://www.lawspot.gr/nomika-nea/apofaseis-olomeleias-ste-istorikis-simantikotitas-dikaiokratiki-opisthodromisi>.

40 Danai Maragoudaki, Media Capture Monitoring Report: Greece measuring compliance with the European Media Freedom Act, International Press Institute, November 2024, <https://ipi.media/wp-content/uploads/2024/11/Greece-Media-Capture-Monitoring-Report-1.pdf>.

41 Ibid.

The Greece-based media organisation Solomon's landmark investigation *Who Owns the Media*⁴² reveals the intricate ownership structures behind Greek media, linking 762 companies to 12 major owners, many involved in sectors like shipping, finance, and energy. With ties to tax havens, these owners wield media as a tool of influence. Solomon's journalist and data editor Corina Petridi underlines that "94 out of these entities are media companies operating mostly in Greece, controlling TV channels, radio stations, newspapers and online media among other things. Apart from that, our research showed that their business activity expands in several business sectors. More specifically, we grouped their companies into 14 business sectors – the most frequent ones being maritime (164), finance (153) and energy (114). An interesting pattern we stumbled upon was the shipping-sports team-media triptych; 6 out of the 10 groups we examined fall into this pattern."⁴³

The findings of the research corroborate previous reports examining media capture and the entanglement of the fourth estate in Greece and its impact on media freedom and independent journalism.⁴⁴

The allocation of state advertising in Greece has faced criticism for its lack of transparency

and potential bias. Historically, state advertising has been distributed in ways that appear to favor media outlets with government-aligned editorial stances, raising concerns about indirect influence over media content. The European Parliament, in its 2024 resolution, emphasised the need for Greece to ensure fair and transparent allocation of state resources to media outlets to prevent undue influence.

Transparency of media ownership

Many elements of Articles 6 and 22 of EMFA are covered by Greek law, but they are not always followed. In accordance with the provisions set forth in the Greek Constitution, all Greek TV channels and radio stations are required to disclose their ownership status to the National Council for Radio and Television (NCRTV).

There are instances wherein, despite the passage of time and the disclosure of control by companies and owners over a given media entity, the registry of ownership has not published the updated information. According to a new report by IPI & MJRC, one such example is that of Alpha TV, where a company based in Luxembourg exercises 50% control over the TV channel, and the owners are a lawyer and an administration services company.

42 Solomon, *Who Owns the Media* project, <https://whoownsthemedia.gr/>.

43 International Press Institute, *Who owns Greece's media? Inside Solomon's investigation*, 15 October 2024, <https://ipi.media/greece-media-ownership-solomon-investigation/>.

44 International Press Institute, *Greece: New report examines media capture in EU member state*, 29 January 2024, <https://ipi.media/greece-new-report-examines-media-capture-in-eu-member-state/>.

Consequently, there is no information available regarding the beneficial owner.⁴⁵

According to the same report, the NCRTV has released reports on its activities and decisions, as well as on major developments in the audiovisual sector, at a slower pace than might be expected. Additionally, the Council has a Department of Transparency that handles all ownership changes in TV channels, but the public data it releases is not readily usable due to the significant delays in publication. Consequently, alterations in media ownership will become apparent to the public either through journalists specialising in media and financial news or with a significant delay (potentially years) from the NCRTV. One of the reasons for this is the lack of personnel at the authority.

Certain provisions of the EMFA are not reflected in Greek legislation. For instance, national law does not mandate that media market concentration assessments account for their potential impact on media pluralism. This includes considerations such as the influence on public opinion formation, the diversity of media services, and the editorial independence of media outlets. In the Greek media industry, evaluations of mergers and acquisitions are based solely on competition-related criteria.

In a further expansion of his media empire, Evangelos Marinakis, a shipping magnate who already owns a number of major outlets in Greece (To Vima, Ta Nea, in.gr, Mega TV broadcaster and One TV broadcaster), bought the rights to use the domain of the historic left-wing newspaper *Eleftherotypia* and its Sunday edition *Kyriakatiki Eleftherotypia* for €8.1m. The newspaper closed in 2014 after going bankrupt. The Hellenic Competition Commission declared that this acquisition did not create a dominant market position or concentration of control that could harm competition. Subsequently, in March 2024, Marinakis's media group, Alter Ego Media, also acquired the commercial rights to the newspaper *Eleftherotypia* and the website enet.gr.⁴⁶

In addition, pod.gr, a successful website for podcast production, was bought by the media group belonging to the Vardinogiannis family.⁴⁷

Public service media

In accordance with the legislation of the Hellenic Republic, the share capital of ERT is vested exclusively in the Greek State. It is endowed with administrative and financial autonomy.⁴⁹ The broadcaster's principal source of revenue is a contributory tax of €3 per

45 IMED, *Media Capture in Greece: A new report by IPI & MJRC*, 19 November 2024, <https://www.imedd.org/media-capture-in-greece-a-new-report-by-ipi-mjrc/>.

46 Danai Maragoudaki, *Media Capture Monitoring Report: Greece measuring compliance with the European Media Freedom Act*, International Press Institute, November 2024, <https://ipi.media/wp-content/uploads/2024/11/Greece-Media-Capture-Monitoring-Report-1.pdf>.

47 Reuters Institute, *Country Profile – Greece*, <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2024/greece>.

month levied on the electricity bills of Greek citizens. ERT also generates commercial revenue through advertising.

The independence and effectiveness of Greece's public service media (PSM) in providing reliable and pluralistic information have been subjects of significant concern over the past years. In 2024, the International Press Institute (IPI) and the Media and Journalism Research Center (MJRC) released the *Media Capture Monitoring Report: Greece* highlighting significant concerns regarding the independence of Greece's public service media. The report underscores that Greece's PSM, particularly the Hellenic Broadcasting Corporation (ERT), is susceptible to political and economic pressures. The frequent replacement of executives with each governmental change undermines the stability and independence of public broadcasting. Additionally, the lack of transparency in state advertising allocation further exacerbates these challenges, leading to a media landscape where genuine pluralism and diverse perspectives are notably lacking.⁴⁸

Online media

Social media continue to be used by most Greeks online to get news (61%), however, the platforms they use are changing. Facebook is now only used for news by 44% of Greeks who are online, down from 68% in 2016. Meanwhile, Instagram and TikTok are now increasingly used for news, 20% and 14% respectively, particularly among younger audiences. However, Greek publishers are still struggling to attract large audiences on these platforms which are dominated by social media personalities or smaller digital-born brands.⁴⁹

In February 2024, Greece enacted Law No. 5099/2024 to align with the EU Digital Services Act (DSA), introducing obligations for online platforms to manage content responsibly.⁵⁰ While these measures aim to curb illegal content and misinformation, concerns have been raised about the potential for overreach and censorship, with critics arguing that vague criteria for content moderation could lead to arbitrary takedowns, stifling legitimate speech.⁵¹

48 Danai Maragoudaki, *Media Capture Monitoring Report: Greece measuring compliance with the European Media Freedom Act*, International Press Institute, November 2024, <https://ipi.media/wp-content/uploads/2024/11/Greece-Media-Capture-Monitoring-Report-1.pdf>.

49 Reuters Institute, *Country Profile – Greece*, <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2024/greece>.

50 Lambadarios Law Firm, *Digital Services Act in Greece*, 26 April 2024, <https://www.lambadarioslaw.gr/2024/04/digital-services-act-in-greece/>.

51 The Institute of International and European Affairs, *The Digital Services Act: Censorship Risks for Europe*, 18 December 2024, <https://www.iiea.com/publications/the-digital-services-act-censorship-risks-for-europe>.

In December 2024, Greece announced a national strategy to protect minors from internet addiction and social media misuse.⁵² While the national strategy announced in December 2024 to protect minors from internet addiction and social media misuse was widely welcomed, critics argue that it falls short in addressing systemic issues. The strategy, which includes a dedicated website for parental control guidance, primarily focuses on individual user behavior and parental responsibility. Critics, however, highlight that such measures fail to tackle root causes, such as exploitative algorithms and the lack of platform accountability.⁵³ A broader, systemic approach is needed to address the underlying practices of digital platforms, such as algorithmic designs that prioritise engagement at the expense of user well-being.

Public trust in media

Greece's press freedom index improved, rising 19 places in 2024, but remains last among EU countries. The country has risen to 88th place from 107th last year out of 180 countries, in Reporters Without Borders' (RSF) *2024 World Press Freedom Index*.⁵⁴ This progress is reflected

in Greece's press freedom index score, which increased from 55.2 in 2023 to 57.15 in 2024.⁵⁵ Despite these advancements, Greece continues to rank last among European Union countries in terms of press freedom. "The rise is largely explained by the deterioration of press freedom in other countries, given the meagre improvement in the score," said Pavol Szalai, the head of RSF's EU and Balkans desk, adding that previous years were marked with grave press freedom violations, such as the murder of a journalist in 2021 or the outbreak of a surveillance scandal in 2022.⁵⁶

This persistent position underscores ongoing challenges within the Greek media environment, including issues related to media independence, transparency, and the safety of journalists.

Public trust in the media in Greece remains notably low across various platforms, including print, radio, television, and both public service and commercial media. The *2024 Digital News Report* by the Reuters Institute indicates that only 23% of Greeks express trust in news overall, positioning Greece at the bottom among

52 Ministry of Digital Governance, *Presentation of the National Strategy for the Protection of Minors from Internet Addiction*, 30 December 2024, <https://mindigital.gr/archives/7076>.

53 Nomiki Vivliothiki, *Presentation of the National Strategy for the Protection of Minors from Internet Addiction*, 30 December 2024, <https://daily.nb.org/nomika-nea/i-ethniki-stratigiki-gia-tin-prostasia-ton-anilikon-apo-ton-ethismo-sto-diadiktyo/>.

54 Reporters Without Borders, *Index*, <https://rsf.org/en/index>.

55 Statista, *Press freedom index in Greece from 2013 to 2024*, <https://www.statista.com/statistics/1026423/greece-press-freedom-index/>.

56 Kathimerini, *Greece's press freedom index improves, still ranks last in EU*, 3 May 2024, <https://www.ekathimerini.com/news/1237976/greeces-press-freedom-index-improves-still-ranks-last-in-eu>.

47 surveyed markets. This pervasive distrust spans all demographic groups but is particularly pronounced among younger individuals and those with left-wing political affiliations. Interestingly, local and regional news outlets tend to garner more trust compared to national media brands, underscoring the perceived credibility challenges faced by both traditional and digital-born national outlets.⁵⁷

A survey conducted by Kapa Research in 2024 further highlights this sentiment, revealing that only 12% of respondents have confidence in the media's contribution to the country's progress and prosperity.

Safety and protection of journalists and other media actors

Frequency of verbal and physical attacks

In 2024, journalists in Greece faced several incidents of verbal and physical attacks, underscoring ongoing concerns about press freedom and the safety of media professionals in the country.

Indicatively:

June 19, 2024: Journalist Frixos Drakontidis was assaulted while reporting live from a fire in Varis-Koropiou, a suburb of Athens. An unidentified man approached him during the broadcast and asked him to leave the spot, leading to a physical confrontation. Drakontidis was punched multiple times and pushed to the ground. He filed a criminal complaint, identifying his attackers as employees of the company affected by the fire.⁵⁸

October 31, 2024: Journalist Giorgos Androutsos, working for *Rizospastis*, was violently detained by police while covering a demonstration by seasonal firefighters in Athens. Despite identifying himself as a journalist, Androutsos was thrown down, beaten, and handcuffed by police officers. He was taken to Evangelismos Hospital for treatment and later released from custody, though he still faces charges.⁵⁹

These incidents underscore the urgent need for Greek authorities to implement effective measures to protect journalists and uphold press

57 Reuters Institute, Country Profile – Greece, <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2024/greece>.

58 Committee to Protect Journalists, *Greek journalist beaten on air while reporting from Athens fire*, 10 July 2024, <https://cpj.org/2024/07/greek-journalist-beaten-on-air-while-reporting-from-athens-fire/>.

59 South East Europe Media Organization, *Police Violence Against Journalist Sparks Outcry in Athens, Greece*, 8 November 2024, <https://seemo.org/ressources/08-11-2024-police-violence-against-journalist-sparks-outcry-in-athens-greece/>.

freedom. Several other incidents are mentioned in CSO reporting.⁶⁰

Smear campaigns

The Liberties Rule of Law Report 2024 and its country chapter on Greece gained particular attention as it coincided with the resolution of the European Parliament on the rule of law and media freedom in Greece (February 2024). This led to the personal targeting of its author within government-related media (Manifesto, Political etc). Legal action has been taken against the smearing process and retractions have been published.

Law enforcement capacity to ensure journalists' safety and to investigate attacks on journalists and media activists

In April 2021, veteran Greek crime journalist Giorgos Karaivaz was fatally shot near his home in Athens, a murder that drew significant attention to press freedom concerns in Greece. In July 2024, two brothers, aged 49 and 41, stood trial for his assassination but were acquitted due to insufficient evidence. The court's decision has been met with criticism from international press freedom organisations, who view it as a setback in the fight against impunity for crimes against journalists. Reporters Without Borders (RSF) expressed

deep concern over the verdict, emphasizing the need for thorough investigations to bring both the perpetrators and those who ordered the crime to justice.⁶¹

This acquittal has intensified calls for Greek authorities to strengthen protections for journalists and ensure that attacks against media professionals are met with accountability. The unresolved nature of Karaivaz's murder continues to cast a shadow over press freedom in Greece, highlighting the challenges journalists face in carrying out their work safely.

Lawsuits and prosecutions against journalists (including SLAPPs) and safeguards against abuse

In Greece, journalists have increasingly faced lawsuits and prosecutions, including Strategic Lawsuits Against Public Participation (SLAPPs), aimed at silencing investigative reporting and critical journalism.

Reporters United and EfSyn: In August 2022, Grigoris Dimitriadis, the nephew of Prime Minister Kyriakos Mitsotakis and former Secretary General of the Prime Minister's Office, filed defamation lawsuits against the investigative platform Reporters United, the newspaper *Efimerida ton Syntakton (EfSyn)*, and journalist Thanasis Koukakis. These legal

60 Joint CSO Report, *Struggle for Accountability: the state of Rule of Law in Greece*, January 2025, page 46-48, <https://vouliwatch.gr/resources/file/2025/2/4/724827b4-407c-419b-bed3-8913ded146d2.pdf>.

61 Reporters Without Borders, *Acquittal in the trial over the killing of Greek journalist Giorgos Karaivaz: RSF is saddened by a "week of impunity"*, 31 July 2024, <https://rsf.org/en/acquittal-trial-over-killing-greek-journalist-giorgos-karaivaz-rsf-saddened-week-impunity>.

actions were in response to their reporting on Greece's Predator spyware scandal, which implicated Dimitriadis in the surveillance of journalists and political opponents.⁶²

Press freedom organisations condemned these lawsuits as SLAPPs, designed to intimidate and silence journalists by burdening them with legal defense costs and potential damages. In October 2024, an Athens court dismissed Dimitriadis's lawsuit against Reporters United and *EfSyn*, ruling that the journalists' reporting was in the public interest and protected under freedom of expression. This decision was hailed as a victory for press freedom, reinforcing the right of journalists to investigate and report on matters of significant public concern without fear of legal retaliation.⁶³

Alterthess: In 2024, the independent media outlet Alterthess faced a SLAPP lawsuit after publishing a report on the conviction of two men for human trafficking. The lawsuit demanded damages, aiming to intimidate the outlet and its journalist, Stavroula Poulimeni. Press freedom organisations supported

Alterthess's appeal, emphasizing the need to protect journalists from legal harassment.⁶⁴

Amending existing national laws or drafting and adopting new laws, which regulate the use of spyware, including safeguards and remedies

An Inside Story article delves into the ongoing controversy surrounding the Predator spyware scandal in Greece, referred to as 'Predatorgate'. It highlights allegations of cover-ups and significant gaps in the investigation, focusing particularly on the absence of a key witness who was never called to testify despite their crucial knowledge of the case.⁶⁵ This report underscores ongoing issues with spyware misuse in Greece and the broader challenges of addressing state-led surveillance within a framework of transparency, accountability, and respect for fundamental rights.

Access to information and public documents

In a recent policy report, Vouliwatch examines the state of access to information and public

62 European Centre for Press and Media Freedom, *Press freedom organisations support Reporters United and EfSyn*, 22 November 2024, <https://www.ecpmf.eu/press-freedom-organizations-support-reporters-united-and-efsyn/>.

63 Eleni Stamatoukou, *Greek Court Dismisses Lawsuit Against Journalists Reporting Surveillance Scandal*, Balkan Insight, 11 October 2024, <https://balkaninsight.com/2024/10/11/greek-court-rejects-slapp-against-journalists-reporting-on-surveillance-scandal/>.

64 European Centre for Press and Media Freedom, *Press freedom on trial in Greece: support Alterthess' appeal*, 19 September 2024, <https://www.ecpmf.eu/press-freedom-on-trial-in-greece-support-alterthess-appeal/>.

65 Eliza Triantafyllou, Tasos Teloglou, *Predatorgate cover-up: the crucial witness who was never called to testify*, Inside Story, 31 October 2024, <https://insidestory.gr/article/syggkalypsi-predatorgate-o-krisimos-martyras-poy-den-klithike-pote-na-katathesei>.

documents in Greece, with a focus on the implementation of law on the freedom of information (FOI) and the challenges that journalists and citizens face in exercising their right to access public data. It highlights that despite the existence of law of freedom of information, the report highlights significant obstacles in obtaining public documents and information and that requests for information are often met with bureaucratic delays, refusals, or vague justifications for not disclosing information, making it difficult for the public and media to hold the government accountable.⁶⁶

According to the same organisation, the amendment of the Code of Administrative Procedure on access to public documents was not sufficient to amount to an incorporation of the Tromsø Convention into Greek law; thus, a holistic revision of the existing legal framework is needed in order to ensure both the effective exercise of the right of access and the application of fundamental democratic principles such as transparency and accountability.⁶⁷

Other

SLAPPs have become more prevalent in Greece in recent years, with individual journalists and media outlets as the main SLAPP targets. Anti-SLAPP advocates in Greece are calling for the country to urgently pass anti-SLAPP legislation.⁶⁸

Although European countries are moving forward with the implementation of the EU Anti-SLAPP Directive, Greece has yet to transpose the Directive into national law. The country has also not fully aligned with the Council of Europe's recommendations on countering Strategic Lawsuits Against Public Participation (SLAPPs). This delay leaves important gaps in the protection of press freedom and journalist safety. In the absence of national anti-SLAPP legislation, various associations and organisations have actively supported defendants facing SLAPPs. For instance, the International Press Institute (IPI) coordinated a joint statement urging Greek authorities to swiftly transpose the EU Anti-SLAPP Directive, highlighting the importance of protecting journalists and public participation.⁶⁹

66 VouliWatch, *Policy Paper – Recommendations for the reform of the legal framework of the right of access to public information*, November 2024, <https://vouliwatch.gr/resources/file/2024/10/8/aac847e9-1e89-4a1b-95a6-1e89ea87940d.pdf>.

67 Joint CSO Report, *Struggle for Accountability: the state of Rule of Law in Greece*, January 2025, page 46-48: <https://vouliwatch.gr/resources/file/2025/2/4/724827b4-407c-419b-bed3-8913ded146d2.pdf>.

68 The Case, *SLAPPs*, <https://www.the-case.eu/slapps/>.

69 International Press Institute, *Press freedom organizations support Reporters United & EfSyn*, 22 November 2024, <https://ipi.media/greece-press-freedom-organizations-support-reporters-united-efsyn/>.

While Greece has not yet implemented specific anti-SLAPP rules, there have been instances where courts have dismissed cases that could be considered SLAPPs. For example, in April

2024, the Three-Member Misdemeanours Court of Athens acquitted Panayote Dimitras, a migrants' rights defender, after five years of judicial harassment.⁷⁰

CHECKS AND BALANCES

Key recommendations

- *The Hellenic Parliament and the General Secretariat for Legal and Parliamentary Affairs should step up the efforts to ensure effective and timely consultation of stakeholders on draft legislation, including by observing the statutory timeframe for public consultation and reducing unrelated, last-minute amendments.*
- *The Greek government should refrain from any interference with the operation of Independent Authorities.*
- *The Ministry of Digital Governance should modernise the Diavgeia platform to improve usability and data accuracy, making administrative decisions accessible to all citizens.*

Process for preparing and enacting laws

Despite efforts to improve the quality of the legislative process in practice, challenges remain.

While draft bills are consistently subject to public consultation and follow-up reports address the comments submitted, concerns regarding

the lack of effective and timely consultation of stakeholders persist. Civil society organisations and other stakeholders have frequently criticised the practice of adopting omnibus legislation and last-minute amendments.

On 23 February 2024, Law 5090/2024 was passed, amending once again the Criminal Code and the Code of Criminal Procedure.

⁷⁰ International Federation for Human Rights, *Greece: Acquittal of migrants' rights defender Panayote Dimitras*, 6 May 2024, <https://www.fidh.org/en/issues/human-rights-defenders/greece-acquittal-of-migrants-rights-defender-panayote-dimitras>.

According to a CSO's report,⁷¹ the content of the draft under discussion had already been subject to extensive criticism during the public consultation process and during the entire legislative passage of the law. The failure to establish a legislative/drafting committee (νομοπαρασκευαστική επιτροπή), the incompatibility of the provisions of the law with the Constitution, the ECHR, supra-legislative rules, fundamental principles of criminal law and modern scientific/research data, as well as the fact that these changes serve purposes other than those announced in the bill, were some of the grounds of this criticism.

According to the Centre for Liberal Studies (KeFiM), in 2024 we witnessed a continuation of the tendency of problematic legislation that includes provisions that are unrelated to each other and unrelated to the law they are attached to, a practice that is clearly contrary to the provisions of the Constitution. According to data from KeFiM, 11 amendments with a total of 65 articles were passed in December 2024 and only one of them was relevant to the law to which it was annexed.⁷²

Similarly, a joint CSO report highlights that, contrary to the rules set on public consultation,

in 2024: 20 bills (41.67%) were subject to a consultation period shorter than the legally prescribed 14 days; in the vast majority of the cases examined (44 out of 48 cases), the bill introduced for voting had more articles than the corresponding bill submitted to public consultation; in 46 out of 48 cases (95.83%), ministerial amendments were tabled after the bill had been submitted to Parliament.⁷³

Independent authorities

Independent authorities are administrative bodies that are part of the state but enjoy intra-administrative independence and have financial and administrative autonomy. In Greece, independent authorities may be enshrined in the Constitution (the Hellenic Data Protection Authority, the National Council for Radio and Television, the Hellenic Authority for Communication Security and Privacy, the Supreme Council for Civil Personnel Selection and the Ombudsman) or provided for by ordinary law (e.g. the Competition Commission, the Greek National Commission for Human Rights, etc.).

Last year, the Hellenic Authority for Communication Security and Privacy (ADAE) was

71 Joint Civil Society report, *Greece in Institutional Decline: 60-day update - Addendum to the Joint Civil Society Submission to the European Commission on the 2024 Rule of Law Report*, 11 March 2024, https://www.hlhr.gr/wp-content/uploads/2024/04/RoL2024_JointSubmission_CSOGreece_Update-2.pdf.

72 Centre for Liberal Studies, *The last legislation of the year - What the Parliament passed in December 2024 and what it passes every December*, 23 December 2024, <https://kefim.org/i-teleftaia-nomothetisi-tou-etous-ti-psifise-i-vouli-ton-dekemvrio-tou-2024-kai-ti-psifizei-kathe-dekemvrio/>.

73 Vouliwatch, *Struggle for Accountability: the state of Rule of Law in Greece*, January 2025, page 46-48, <https://vouliwatch.gr/resources/file/2025/2/4/724827b4-407c-419b-bed3-8913ded146d2.pdf>.

heavily targeted by government members, in the context of the investigation of the wire-tapping scandal. High-ranking state officials (Prime Minister, Speaker of the Parliament, government representatives) turned against the President and the members of the constitutionally enshrined ADAE, raising potential issues around obstructing the exercise of the independent authority's powers. This year, in the context of the transposition of NIS 2 Directive (Directive (EU) 2022/2555) to enhance cybersecurity across the EU, the government has included provisions that undermine the powers of the constitutionally established independent authority, i.e. ADAE, in order to transfer them to the National Cyber Security Authority, which is a public body under the Ministry, supervised by the Minister of Digital Governance. This development is generally seen as part of the conflict of the government with ADAE since the wiretapping scandal,⁷⁴ causing independent authorities to feel that they operate under pressure, affecting their independent status.

On 20 February 2024, media reported that the Public Prosecutor of Athens archived the case against two members of ADAE who had been summoned in October 2023 as suspects for the offence of leaking sensitive state secrets to journalist Thanasis Koukakis.⁷⁵

The National Transparency Authority (NTA) has faced significant criticism regarding its transparency and effectiveness. A notable instance involves the NTA's investigation into allegations of illegal pushbacks of asylum seekers by Greek authorities. In March 2022, the NTA concluded a three-month investigation, asserting that there was no evidence to substantiate claims of such pushbacks, despite extensive reporting by CSOs and international bodies; NTA's assessment comes in stark contradiction with recent ECtHR jurisprudence (see below, Systemic Human Rights Violations).

Accessibility and judicial review of administrative decisions

Diavgeia is the official transparency portal of the government. All government institutions are obliged to upload their acts and decisions on the Internet with special attention to issues of national security and sensitive personal data. Each document is digitally signed and assigned a unique Internet Uploading Number (IUN) certifying that the decision has been uploaded at the 'Transparency Portal'. Following the latest legislative initiative (Law 4210/2013) of the Ministry of Administrative Reform and e-Governance, administrative acts and decisions are not valid unless published online.

74 Ethnos, *ADAE: Stripped of critical responsibilities - Replaced by the National Cyber Security Authority*, 16 November 2024, <https://www.ethnos.gr/greece/article/341894/adaeapogymnonetaiapokrisimesarmodiothtesantikathistataiapothnethnikharxhkybernoasfaleias>.

75 Yannis Souliotis, *Prosecutor shelves probe into ADAE members over alleged leaks to the press*, *Kathimerini*, 20 February 2024, <https://www.ekathimerini.com/news/1232152/prosecutor-shelves-probe-into-adae-members-over-alleged-leaks/>.

Although constituting a very important tool for the accessibility of administrative decisions, there is mounting criticism that Diavgeia has not been updated to incorporate new tools and parameters, and is not always easily understandable or useful for the average citizen without specialised knowledge, so it needs reform in order to serve its purpose. For example, an investigation by Data Journalists (see above, ‘Corruption’) raises questions about the accuracy and redundancy of information published on the Diavgeia platform, citing instances where funds were allocated for projects that had already been completed.⁷⁶

Vouliwatch, a non-profit organisation focused on access to public information, describes the existing legislative framework in Greece as “fragmented” and “labyrinthine” in a recent policy document titled *Recommendations for Reforming the Legal Framework of the Right of Access to Public Information*.⁷⁷ The organisation notes that this complexity poses a significant barrier to exercising these rights effectively and that, despite the existence of a legislative framework, its practical implementation faces significant challenges, such as delays, poor

compliance by public authorities, and limited public awareness.

Electoral framework

Voting is compulsory for citizens who are at least 17 years of age in an election year, although penalties for abstention are not enforced. The 2024 EU elections were the first in the country in which people could vote by postal ballot. Of the 202,515 who registered to receive a postal ballot, about 177,800 returned them.⁷⁸

The elections were generally held in a competitive and pluralistic environment, and fundamental freedoms were respected. While public discourse was generally open, instances of heated rhetoric and polarised discussions were noted, reflecting broader societal divisions.

In April 2024, Greece faced a public outcry over the widespread use of unsolicited political messages, commonly referred to as ‘political spam’, in the lead-up to the European Parliament elections. Citizens reported receiving an overwhelming number of text messages and phone calls promoting various political parties and candidates, leading to frustrations over

76 Vangelis Triantis, *Enterprise Greece: Distributing millions for projects... Already completed in the past. Shadows and questions surround the “Digitalization of the Economic Diplomacy Network” project, with a budget of 9.721 million euros*, Data Journalists, 24 November 2024, <https://www.datajournalists.co.uk/2024/11/24/enterprise-greece-distributing-millions-for-projects-already-completed-in-the-past/?lang=en>.

77 VouliWatch, *Policy Paper – Recommendations for the reform of the legal framework of the right of access to public information*, November 2024, <https://vouliwatch.gr/resources/file/2024/10/8/aac847e9-1e89-4a1b-95a6-1e89ea87940d.pdf>.

78 Kathimerini, *The election in Greece, in a nutshell*, 8 June 2024, <https://www.ekathimerini.com/in-depth/1240927/the-election-in-greece-in-a-nutshell/>.

privacy violations and intrusive campaign tactics. The controversy sparked debates about the adequacy of existing regulations on political advertising and the need for stricter enforcement mechanisms.⁷⁹

Just a few weeks later, Greece's Interior Ministry was fined €50,000 by the Hellenic Data Protection Authority (HDPA) for a significant data breach involving the personal information of expatriate voters. The breach occurred when a list of these voters, who had registered for the upcoming European Parliament elections, was leaked to a ruling New Democracy party member.⁸⁰

Finally, according to the Organization for Security and Co-operation in Europe (OSCE) Office for Democratic Institutions and Human Rights (ODIHR) mission report, ODIHR Special Election Assessment Mission (SEAM) interlocutors in Greece noted the high deposit amount requested as a hindrance for candidate participation. The same report underlines that the media provided contestants with free time, as per their legal requirements, however, in some cases, it was offered between 1:00 and 3:00 at night.

CIVIC SPACE

Key recommendations

- *The Ministry of Migration and Asylum should assess and amend existing laws that may disproportionately hinder CSO operations, ensuring they align with EU standards and fundamental rights.*
- *The Ministry of Migration Policy should ensure independent investigation for police violence and misconduct.*
- *The judiciary should ensure full accountability for the mass surveillance scandal, commonly known as 'Predatorgate'.*

79 France 24, *Political spam sparks uproar in Greece ahead of EU vote*, 5 April 2024, <https://www.france24.com/en/live-news/20240405-political-spam-sparks-uproar-in-greece-ahead-of-eu-vote>.

80 Nektaria Stamouli, *Greece rocked by voter privacy scandal ahead of EU election*, Politico, 28 May 2024, <https://www.politico.eu/article/fine-imposed-greek-interior-ministry-voters-data-breach-eu-elections/>.

Freedom of association

The shrinking of civic space has become a worrying trend in the country in recent years.

While no new laws were passed on freedom of association in 2024, the Joint Ministerial Decision No. 3063/2020, which in 2020 introduced strict requirements for the operation of CSOs working on migration in Greece, is still in place. The law makes it difficult for these organisations to register, consequently hindering their operations.

Various domestic and international bodies, including the European Commission, have raised concerns about the compatibility of the legislation with the country's legal obligations; nevertheless, Greece insists on implementing it.

Public information regarding how many CSOs were accepted or rejected to be registered is not available and the selection criteria remain unclear.⁸¹

The Ministry of Migration and Asylum refrained from providing data in its 8 February 2024 response to the RSA request of 6 November 2023 for statistics on the operation of its NGO Registry, including the number of pending and rejected applications for registration of

organisations and natural persons, as well as the number of suspensions from the registries of said Ministry. The absence of such statistics was flagged at a 12 February 2024 meeting of civil society organisations and the Ministry's General Secretariat for Reception, attended by the DG HOME Task Force Migration Management. In a March 2024 meeting with civil society organisations, DG HOME confirmed that it has no access to these figures either.⁸²

Following pressure, the Ministry of Migration and Asylum unofficially communicated that the registration requirements would be reviewed and amended, but no such actions have been taken to date.⁸³

Other

There have been significant instances in Greece where human rights defenders and humanitarian workers have faced criminal charges for their activities, particularly in the context of migration and asylum support. Human rights defenders have reported instances of prolonged legal battles, including baseless accusations, which are seen as attempts to intimidate or silence them.

For example, in August 2024, the Greek Supreme Court dropped misdemeanour

81 European Civic Forum, *Civic Space Report 2024*, May 2024, https://civic-forum.eu/wp-content/uploads/2024/05/Civic-Space-Report-2024_ECF.pdf.

82 HLHR, *Greece in Institutional Decline: 60-day update - Addendum to the Joint Civil Society Submission to the European Commission on the 2024 Rule of Law Report*, 11 March 2024, https://www.hlhr.gr/wp-content/uploads/2024/04/RoL2024_JointSubmission_CSOGreece_Update-2.pdf.

83 Ibid.

charges against Sarah Mardini and Seán Binder, who were involved in search and rescue operations for migrants.⁸⁴ Felony charges remain in place, while no hearing has been scheduled yet.

Another example is that, in April 2024, the Three-Member Misdemeanours Court of Athens acquitted Panayote Dimitras, a migrants' rights defender, after five years of judicial harassment. He was prosecuted under criminal charges of 'false accusation' and 'aggravated defamation' (Articles 229 and 363 of the Criminal Code of Greece, respectively) for having denounced racist comments from a public official.⁸⁵

Freedom of peaceful assembly

Incidents of police violence and arbitrariness are not isolated cases but rather a frequent and increasingly common phenomenon in Greece. The Hellenic League for Human Rights (HLHR) has published a comprehensive report titled *Police, Violence, and Rights: An Overview of Police Arbitrary Actions in Greece*, shedding light on the persistent issues of police violence and misconduct in the country. The report documents numerous instances where

law enforcement officers have employed disproportionate violence, often during public demonstrations and routine patrols. Such actions have led to serious injuries and, in some cases, fatalities among civilians.

There is a concerning pattern of aggressive police tactics aimed at dispersing peaceful protests. The use of tear gas, arbitrary detentions, and physical assaults on demonstrators undermine the constitutional right to peaceful assembly. The report also highlights discriminatory practices targeting minority groups, including Roma communities and migrants. These groups are disproportionately subjected to police checks, violence, and unjust treatment.

According to the report, the systemic failure to hold officers accountable for misconduct perpetuates a culture of impunity. Investigations into allegations of police brutality are often inadequate, and disciplinary actions are rare. Finally, the findings point to insufficient training in human rights and crowd management for police personnel. Additionally, there is a lack of effective oversight mechanisms to monitor and regulate police conduct.⁸⁶

84 Lesvos News, *Great victory of solidarity in Mytilene! The 16 volunteers of the NGO ERCI were acquitted*, 30 January 2024, <https://www.lesvosnews.net/articles/news-categories/astynomiko-reportaz/megali-niki-tis-alli-leggyis-sti-mytilini-athooi-oi-16>.

85 International Federation for Human Rights, *Greece: Acquittal of migrants' rights defender Panayote Dimitras*, 6 May 2024, <https://www.fidh.org/en/issues/human-rights-defenders/greece-acquittal-of-migrants-rights-defender-panayote-dimitras>.

86 Hellenic League for Human Rights, *Police, violence and rights: An overview of police arbitrariness in Greece*, September 2024, https://www.hlhr.gr/wp-content/uploads/2024/09/PB_EL_e-book_F.pdf.

Online civic space

Digital surveillance

In April 2024, the Hellenic Council of State (Συμβούλιο της Επικρατείας) issued a landmark decision⁸⁷ regarding the surveillance of Nikos Androulakis, leader of the political party PASOK, by the National Intelligence Service (EYΠ). The court declared unconstitutional a 2021 law that prohibited informing individuals about the lifting of their communication privacy by the EYΠ, even after the surveillance had ended. The Council of State emphasised that such a complete ban constitutes an excessive restriction on the inviolability of communications, unjustifiable within a rule of law framework, and therefore contravenes Article 19, paragraph 1 of the Greek Constitution. Consequently, the court mandated the Hellenic Authority for Communication Security and Privacy (ΑΔΑΕ) to promptly inform Mr. Androulakis about the prosecutorial order and the collected material related to the interception of his communications.

Data protection and privacy issues

The Greek Ministry of Migration and Asylum was fined⁸⁸ €175,000 in April 2024 by the Hellenic Data Protection Authority (HDPA) for unlawful use of surveillance systems at

asylum centers. The fine relates to the Centaur system, installed in reception centers and migrant camps, which lacked compliance with data protection regulations.

The HDPA found that the Ministry had processed personal data, including biometric information, without adequate safeguards or transparency. The system, intended to enhance security, was criticised for violating individuals' privacy rights and operating without appropriate legal justification or data protection impact assessments.

This decision underscores concerns over the balance between security measures and fundamental rights, particularly regarding vulnerable populations such as asylum seekers. The ruling has been seen as a significant step in holding public authorities accountable for adhering to data protection laws and safeguarding privacy rights in Greece.⁸⁹

Public participation

In February 2024, Greece legalised same-sex marriage, marking a significant advancement for LGBTQIA+ rights and inclusion. The legislation was introduced to the Hellenic Parliament on 1 February 2024, and passed on 15 February with a vote of 176 in favor, 76 against, two abstentions, and 46 absentees. The bill

87 Decision 465/2024 of the Plenary of the Council of State.

88 Decision 13/2024 of the Hellenic Data Protection Authority, <https://www.dpa.gr/el/enimerwtiko/prakseisArxis/aytepaggelti-ereyna-gia-tin-anaptyxi-kai-egkatastasi-ton-programmaton>.

89 Eleni Stamatoukou, *Greek Ministry Fined Over Surveillance Systems at Asylum Centres*, Balkan Insight, 3 April 2024, <https://balkaninsight.com/2024/04/03/greek-ministry-fined-over-surveillance-systems-at-asylum-centres/>.

received support from multiple political parties, including the opposition SYRIZA, PASOK, Course of Freedom, and New Left, reflecting a broad consensus across the political spectrum.

The new law grants same-sex couples the right to marry and adopt children, providing them with legal recognition and rights equivalent to those of opposite-sex couples.⁹⁰

DISREGARD OF HUMAN RIGHTS OBLIGATIONS AND OTHER SYSTEMIC ISSUES AFFECTING THE RULE OF LAW ENVIRONMENT —

Key recommendations

- *The Ministry of Migration and Asylum and the other competent ministries should create an independent authority to investigate pushbacks of refugees and migrants.*

Systemic human rights violations

Impunity and/or lack of accountability for human rights violations

In a landmark decision, the European Court of Human Rights (ECtHR)⁹¹ condemned Greece for the first time for a pushback incident at the Evros River border. The case concerned the forcible return of asylum seekers to Turkey without due process, violating their fundamental rights. The court ruled that Greece had breached the European Convention on Human Rights, specifically Articles 3 (prohibition of

inhuman or degrading treatment), 13 (right to an effective remedy), and Protocol 4, Article 4 (prohibition of collective expulsions). The ruling highlighted the lack of procedural safeguards, including the absence of an individual assessment of the asylum seekers' cases. It also emphasised the risk of ill-treatment faced by the individuals upon their return to Turkey. This decision sets a significant precedent, shedding light on the persistent issue of pushbacks at European borders and calling for Greece to ensure compliance with international and European human rights standards in managing migration and border policies.⁹²

90 BBC, *Greece legalizes same-sex marriage*, 16 February 2024, <https://www.bbc.com/news/world-europe-68310126>.

91 ECtHR, Judgment of 7 January 2025, *A.R.E. v. Greece*, no. 15783/21 (2025).

92 Greek Council for Refugees, *Greece condemned for the first time for pushback in Evros by the European Court of Human Rights*, 7 January 2025, <https://gcr.gr/el/news/press-releases/item/katadiki-tis-elladas-gia-proti-fora-gia-push-back-ston-evro-apo-to-eyropaiko-dikastirio-dikaionaton-toy-anthropoy/>.

The Ombudsman's inquiry into the Pylos shipwreck,⁹³ Europe's deadliest migrant shipwreck in recent history, reveals a series of serious and reprehensible omissions in the search and rescue duties on the part of senior officers of the Hellenic Coast Guard. The report finds that the actions and omissions of the implicated officers during the handling of the incident on 13 and 14 June 2023 constitute the offences of deadly exposure to danger, as well as exposure to endangering the life, health and physical integrity of those on board the Adriana fishing vessel, punishable under Article 306 of the Criminal Code.⁹⁴

Rights (HLHR), HIAS Greece, Homo Digitalis, Refugee Support Aegean (RSA), Reporters United, Solomon, and Vouliwatch – has joint forces to raise awareness on the rule of law in Greece.

FOSTERING A RULE OF LAW CULTURE

Contribution of civil society and other non-governmental actors

Govwatch is an independent, not-for-profit initiative by Vouliwatch. It collects, records and reports violations or suspected violations of the rule of law in Greece, by theme. Govwatch aims to provide a source of information for citizens and institutions, to enable civil society to highlight wrongdoing, and to increase accountability in the political system.⁹⁵

A CSO coalition – Greek Council for Refugees (GCR), Hellenic League for Human

93 Greek Ombudsman, *The Ombudsman's Report on the Pylos Shipwreck*, January 2025, <https://www.synigoros.gr/en/category/default/post/press-release-or-the-ombudsman's-report-on-the-pylos-shipwreck>.

94 Ibid.

95 Govwatch, About, <https://govwatch.gr/about/>.

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The Civil Liberties Union for Europe

The Civil Liberties Union for Europe (Liberties) is a non-governmental organisation promoting the civil liberties of everyone in the European Union. We are headquartered in Berlin and have a presence in Brussels. Liberties is built on a network of 21 national civil liberties NGOs from across the EU.

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