

Coronavirus COVID-19 outbreak in the EU

Fundamental Rights Implications

Country: Greece

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1. Measures taken by government/public authorities

1.1 General measures

The Greek government adopted general measures in response to the Coronavirus COVID-19 outbreak in the form of Acts of Legislative Content (*πράξεις νομοθετικού περιεχομένου*). Joint Ministerial Decisions (*κοινές υπουργικές αποφάσεις, Κ.Υ.Α*) and circulars (*εγκύκλιοι*) are issued to implement or specify the provisions in the acts of legislative content. Acts of Legislative Content are provided for in the Constitution of Greece and their use is restricted to extraordinary circumstances.¹ The core measures adopted to this moment are incorporated in three Acts of Legislative Content and are being specified by multiple ministerial decisions and circulars. The General Secretariat of Civil Protection (GGPP) (Γενική Γραμματεία Πολιτικής Προστασίας, Γ.Γ.Π.Π) is the competent authority to declare state of emergency of civil protection.² To this day, 23 March 2020, state of emergency of civil protection (*κατάσταση ανάγκης πολιτικής προστασίας*) has not been declared by the General Secretariat of Civil Protection (GGPP) (Γενική Γραμματεία Πολιτικής Προστασίας, Γ.Γ.Π.Π) according to their official website.

The first Act of Legislative Content was adopted on 25 February 2020 (O.G A' 42/25-2-2020).³ Act O.G A' 42/25-2-2020 focuses on preventive measures such as medical checks, pharmaceutical treatment, confinement and vaccination, closure of public spaces and suspension of artistic and sports events. Following the issuance of this act, the Ministry of Education and Religious Affairs (*Υπουργείο Παιδείας και Θρησκευμάτων*) imposed the closure of all educational institutions in Greece until 24 March 2020 with its decision of 10 March 2020.⁴ Pursuant to Act O.G A' 42/25-2-2020, Joint Ministerial Decisions O.G B' 855/13-3-2020, O.G B' 857/14-3-2020, O.G B' 915/17-3-2020 and circular No 5/2020/18-3-2020⁵ of the Ministry of Development and Investments (*Υπουργείο Ανάπτυξης και Επενδύσεων*) were issued mandating the effective horizontal closure of all retail businesses, restaurants, cafe bars, cinemas, theatres, fitness centres, museums, catering and tourist businesses until the 31st March 2020. The same measure is imposed for tourist lodging businesses until 30th April 2020. Catering and retail businesses are allowed to maintain delivery and take-away services.

On 11 March 2020, through the second Act of Legislative Content (*πράξη νομοθετικού περιεχομένου*) O.G A' 55/11-3-2020, a new set of emergency measures was adopted focusing on the negative financial

¹ Greece, The Constitution of Greece, as revised by the parliamentary resolution of May 27th 2008 of the VIIIth Revisionary Parliament, Article 44 paragraph 1 (*Σύνταγμα της Ελλάδας, όπως αναθεωρήθηκε με το ψήφισμα της 27ης Μαΐου 2008 της Η' Αναθεωρητικής Βουλής των Ελλήνων*), available in English at <https://bit.ly/3bghaCu>

² The General Secretariat of Civil Protection (GGPP) (Γενική Γραμματεία Πολιτικής Προστασίας, Γ.Γ.Π.Π) is the competent authority to declare state of emergency of civil protection. Greece, Law 4662/2020, Art 25, O.G A' 27/7-2-2020, "on National Crisis Management Mechanism and risk management, restructuring of the General Secretariat for Civil Protection, upgrading of the voluntary policy system protection, reorganisation of the Fire Brigade and other provisions." (*Εθνικός Μηχανισμός Διαχείρισης Κρίσεων και Αντιμετώπισης Κινδύνων, αναδιάρθρωση της Γενικής Γραμματείας Πολιτικής Προστασίας, αναβάθμιση συστήματος εθελοντισμού πολιτικής προστασίας, αναδιοργάνωση του Πυροσβεστικού και άλλες διατάξεις*). Available in Greek at <https://bit.ly/2QHW2NM>

³ Greece, Act of legislative content "on emergency measures of prevention and limitation of the contagion of the coronavirus" (*Κατεπείγοντα μέτρα αποφυγής και περιορισμού της διάδοσης κορωνοϊού*), (O.G A' 42/25-2-2020), available in Greek at <https://www.taxheaven.gr/law/%CE%A0%CE%9D%CE%A025.02.2020/2020>

⁴ Greece, Ministries of Development and Investments, Citizen Protection, Education and Religious Affairs, Labor and Social Affairs, Health, Culture and Sports, Interior, Joint Ministerial Decision "on the imposition of temporary closure of [...] educational institutions [...] 11.3.2020 until 24.3.2020." (*Επιβολή του μέτρου της προσωρινής απαγόρευσης λειτουργίας [...] εκπαιδευτικών δομών[...]11.3.2020 έως και 24.3.2020.*), No D1a/GP.oik 16838, O.G B' 783/10-3-2020, available in Greek at <https://bit.ly/3dkgm1r>

⁵ Greece, the Ministry of Development and Investments (*Εγκύκλιος του Υπουργείου Ανάπτυξης και Επενδύσεων*), Circular No 5/2020/18-3-2020, available in Greek at <https://bit.ly/33J3s8L>

impact of the Coronavirus COVID-19 outbreak.⁶ Act O.G A' 55/11-3-2020 provides for measures suspending debt repayment obligations, extending the deadlines of repayment for taxpayers and enterprises, allowing flexible arrangements in work schedules, providing for special-purpose leave for workers, suspending upcoming parades and obliging radio and TV stations to transmit information messages.

As far as the implementation of the above measures is concerned, solid instructions to workers and employers were issued by the Ministry of of Labor and Social Affairs (Υπουργείο Εργασίας και Κοινωνικών Υποθέσεων) on 12 March 2020 by way of a circular specifying the measures of special purpose leave for working parents, remote work and insurance payments.⁷ The special purpose leave for working parents of children attending the compulsory education units⁸ or special schools⁹ is mandated to last as long as the closure of these schools. The possibility of tele-work is addressed in the same circular upon decision of the employer of each business.

The Act of Legislative Content O.G A' 64/14-3-2020 was published on 14 March 2020 and contained additional emergency measures in response to the need to limit the transmission of Coronavirus COVID-19.¹⁰ Act O.G A' 64/14-3-2020 includes measures extending the schedules of catering services and obliges supermarkets and pharmacies to inform public authorities on available stock of sanitation products and antiseptics. In addition, article 13 paragraph 1 of Act O.G A' 64/14-3-2020 provides for a supportive mechanism for workers. Concrete relief measures in favour of self-employed individuals, employees and unemployed were announced by the Ministry of Labor and Social Affairs (Υπουργείο Εργασίας και Κοινωνικών Υποθέσεων) in a press release on 18 March 2020.¹¹ These measures form the supportive mechanism stated above and include a special purpose compensation (αποζημίωση ειδικού σκοπού) of €800 to be paid in April to employees working in enterprises which suspended their operation, the postponement of payment of insurance and tax obligations for self-employed individuals and businesses and the extension of the unemployment benefit for a two-month period for those who would normally stop receiving it on 31 March 2020.

For the purposes of the effective implementation of the new support mechanism, the Ministry of Labor and Social Affairs (Υπουργείο Εργασίας και Κοινωνικών Υποθέσεων) issued a Joint Ministerial Decision¹² providing details on the procedure including the establishment of an online platform

⁶ Greece, Act of legislative content “on emergency measures to counteract the negative impact of the coronavirus COVID-19 emergence and the need to limit its contagion” (*Κατεπείγοντα μέτρα αντιμετώπισης των αρνητικών συνεπειών της εμφάνισης του κορωνοϊού COVID-19 και της ανάγκης περιορισμού της διάδοσής του*), (O.G A' 55/11-3-2020), available in Greek at <https://www.taxheaven.gr/law/%CE%A0%CE%9D%CE%A011.03.2020/2020>

⁷ Greece, ο Ministry of Labor and Social affairs (Υπουργείο Εργασίας και Κοινωνικών Υποθέσεων), Circular No 12339/404/12-3-2020, available in Greek at <https://www.ypakp.gr/uploads/docs/12312.pdf>

⁸ Kindergarten, Nursery, Primary and Junior High School

⁹ Education units for persons with disabilities regardless of age

¹⁰ Greece, Act of legislative content on “Emergency measures in response to the need to limit the dispersion of the coronavirus COVID-19” (*Κατεπείγοντα μέτρα αντιμετώπισης της ανάγκης περιορισμού της διασποράς του κορωνοϊού COVID-19*), (O.G A' 64/14-3-2020), available in Greek at <https://www.taxheaven.gr/law/%CE%A0%CE%9D%CE%A014.03.2020/2020>

¹¹ Greece, Ministry of Labor and Social affairs (Υπουργείο Εργασίας και Κοινωνικών Υποθέσεων), Declaration of Giannis Vrotsis on the second set of one-off support measures for workers, freelancers, self-employed, unemployed and businesses with a non-redundancy clause (*Δήλωση Υπ. Εργασίας Γιάννη Βρούτση για τη δεύτερη δέσμη έκτακτων μέτρων στήριξης για εργαζόμενους, ελεύθερους επαγγελματίες, αυτοαπασχολούμενους, ανέργους και επιχειρήσεις με ρήτρα διατήρησης θέσεων εργασίας*), Press release, 18 March 2020 , available at <https://www.ypakp.gr/uploads/docs/12319.pdf>

¹² Greece, Ministry of Labor and Social Affairs, Joint Ministerial Decision No 12997/231 O.G B' 993/23-3-2020 on “Mechanism of application of support measures of employees in response to the negative impact of coronavirus COVID-10” (*Μηχανισμός εφαρμογής των μέτρων στήριξης των εργαζομένων με εξαρτημένη εργασία για την αντιμετώπιση των επιπτώσεων του κορωνοϊού COVID-19*) available in Greek at <https://bit.ly/2WGd0zK>

collecting the applications.¹³ The above Joint Ministerial Decision also provides for a special reduction of rent for employees working in businesses which were obliged to suspend operations.¹⁴ It must be underlined that employees who continue to work through tele-work or employees who were already on another form of leave such as maternity or educational leave are exempted from the support mechanism since their financial and insurance status are not impacted by the suspension of operation of the businesses they are employed by. It is still unspecified whether domestic workers (οικιακοί μισθωτοί) can benefit from the special purpose benefit since the above Joint Ministerial Decision makes reference to individuals employed by businesses or employers who had to suspend their operations and thus does not address the issue of domestic workers.¹⁵ Trainee lawyers are also exempted from the special support mechanism and the Athens Bar Association addressed a complaint letter to the Ministries of Finances, Labor and Justice requesting the access of trainee lawyers to the relief measures.¹⁶

It is important to note that, according to the above mentioned press release, businesses in operation who proceed to redundancies will be exempted from any relief measures. Redundancies made by businesses who have suspended operations are considered illegal.

1.2 Freedom of movement

Temporary quarantine measures can be imposed on individuals or groups according to a detailed procedure.¹⁷ It is underlined that measures are to be taken with respect to the general principle of proportionality and the rule of law. Paragraph 5 of the same article provides a remedy against such measures for all affected parties.

The horizontal temporary restriction of movement for the residents of the entire Greek territory was imposed on 22 March 2020 until 6 April 2020 by way of Joint Ministerial Decision.¹⁸ All form of movement is prohibited without a special permit on limited grounds. This special permit is granted through a new online platform launched by the General Secretariat of Civil Protection (GGPP) (Γενική Γραμματεία Πολιτικής Προστασίας, Γ.Γ.Π.Π) or via SMS.¹⁹ Permission to move outside is only granted for purposes of buying food and medicine, attending doctor's appointments, going to work, training outdoors alone or with one other person, walking a pet, and attending a ceremony such as funeral or wedding. Individuals who are found outside must also carry some form of identification documents such as piece of identity or passport. Any violation of these measures may be subject to a penalty of €150 which shall be imposed by the police or other public security forces. The General Secretariat of

¹³ The online platform is available at supportemployees.yeka.gr

¹⁴ Greece, Art 2, para. 1, Joint Ministerial Decision No 12997/231 of the Ministry of Labor and Social Affairs, O.G B' 993/23-3-2020 on "Mechanism of application of support measures of employees in response to the negative impact of coronavirus COVID-10" (*Μηχανισμός εφαρμογής των μέτρων στήριξης των εργαζομένων με εξαρτημένη εργασία για την αντιμετώπιση των επιπτώσεων του κορωνοϊού COVID-19*) available in Greek at <https://bit.ly/2WGd0zK>

¹⁵ *Ibid.*

¹⁶ Greece, President of the Athens Bar Association, Letter to the Ministers of Finance, Labor and Justice to include the trainee lawyers in the beneficiaries of the €800, 23 March 2020, available in Greek at <https://bit.ly/3arG1n7>

¹⁷ Greece, Act of Legislative Content on "Urgent measures to address the consequences of the spread of the coronavirus COVID-19, to support society and entrepreneurship and to ensure the smooth functioning of the market and public administration." (O.G A' 68/20-3-2020) (*Κατεπείγοντα μέτρα για την αντιμετώπιση των συνεπειών του κινδύνου διασποράς του κορωνοϊού COVID-19, τη στήριξη της κοινωνίας και της επιχειρηματικότητας και τη διασφάλιση της ομαλής λειτουργίας της αγοράς και της δημόσιας διοίκησης*), available in Greek at [available in Greek at https://bit.ly/2Uhc5UV](https://bit.ly/2Uhc5UV)

¹⁸ Greece, Ministries of Citizen Protection, Health and Interior, Joint Ministerial Decision No. D1a/G.P oik. 20036, O.G B' 986/22-3-2020 on "Imposition of a measure to temporarily restrict the movement of citizens in response to the risk of spreading the COVID-19 coronavirus." (*Επιβολή του μέτρου του προσωρινού περιορισμού της κυκλοφορίας των πολιτών προς αντιμετώπιση του κινδύνου διασποράς του κορωνοϊού COVID-19*) available in Greek at <https://bit.ly/2Ud69we>

¹⁹ The online platform is available at <https://forma.gov.gr/>

Civil Protection (GGPP) (Γενική Γραμματεία Πολιτικής Προστασίας, Γ.Γ.Π.Π) also reported the imposition of penalties of €5,000 to four potentially infected individuals on the grounds of violating the quarantine measure imposed on them. Specific travel bans and in-house isolation had already been imposed on the residents of the villages Damaskinia and Dragasia in the Kozani area in northern Greece pursuant to the decision of the General Secretary of Civil Protection (Γενικός Γραμματέας Πολιτικής Προστασίας) on 16 March 2020 for two weeks.²⁰

Although not a mandatory isolation measure, the General Secretariat of Civil Protection (GGPP) (Γενική Γραμματεία Πολιτικής Προστασίας, Γ.Γ.Π.Π) has launched a campaign entitled “We stay at home” (“Μένουμε Σπίτι”) encouraging individuals to avoid social interaction.²¹ Some public services have stopped offering their services in person and offer online services. This was adopted by the Single Social Security Entity (EFKA) (Ενιαίος Φορέας Κοινωνικής Ασφάλισης, Ε.Φ.Κ.Α)²² and the Manpower Employment Organisation (OAED) (Οργανισμός Απασχόλησης Εργατικού Δυναμικού Ο.Α.Ε.Δ) since 15 March 2020.²³

A temporary ban on the entry to and exit from the Greek territory of individuals or groups coming from or going to affected areas abroad may be applied.²⁴ For the application of this measure areas affected by the coronavirus COVID-19 are identified on a case-by-case basis by the Minister of Health upon recommendation of the Hellenic National Public Health Organization (EODY) (Εθνικός Οργανισμός Δημόσιας Υγείας, Ε.Ο.Δ.Υ).

According to a joint press release of the Ministry of Civil Protection and Ministry of Health issued on the 17th March 2020, persons arriving in Greece from abroad are strongly advised to voluntarily self-isolate for 14 days.²⁵ It is noted that according to the above press release only persons of Greek and/or EU citizenship or persons legally working permanently in Greece are allowed to enter the Greek territory until further notice. The UNHCR issued a paper on 16 March 2020 drawing attention to the

²⁰ Greece, General Secretariat of Civil Protection (GGPP) (Γενική Γραμματεία Πολιτικής Προστασίας, Γ.Γ.Π.Π). “Declaration of temporary in house isolation (quarantine) of the inhabitants of the villages of Damaskinias and Dragassia of the Municipality of Voios due to the COVID-19 coronavirus” (Κήρυξη προσωρινής επιβολής περιορισμού κατ’ οίκον (καραντίνα) των κατοίκων των ορεινών χωριών Δαμασκηνιά και Δραγασιά του Δήμου Βόιου λόγω κορωνοϊού COVID-19), Press release, 16 March 2020, available in Greek at <https://www.civilprotection.gr/el/simantika-themata/kiryxi-prosorinis-epivolis-periorismoy-kat-oikon-karantina-ton-katoikon-ton>

²¹ Greece, General Secretariat of Civil Protection (GGPP) (Γενική Γραμματεία Πολιτικής Προστασίας, Γ.Γ.Π.Π). “New Information Campaign of the GGPP for Vulnerable Groups on COVID-19 - We Stay at Home” (Νέα ενημερωτική καμπάνια της ΓΓΠΠ για τον Κορωνοϊό για τις ευπαθείς ομάδες - Μένουμε Σπίτια μας), Press release, 9 March 2020, available in Greek at <https://www.civilprotection.gr/el/simantika-themata/nea-enimerotiki-kampania-tis-ggpp-gia-ton-koronoio-gia-tis-eypatheis-omades>

²² Single Social Security Entity (EFKA) (Ενιαίος Φορέας Κοινωνικής Ασφάλισης, Ε.Φ.Κ.Α) was established by the Greek government on 1 January 2017 as a centralised entity of social security. See more on the official website at <https://www.efka.gov.gr/en>

²³ Greece, General Secretariat of Civil Protection (GGPP) (Γενική Γραμματεία Πολιτικής Προστασίας, Γ.Γ.Π.Π). “Update to accredited health journalists by Deputy Minister of Civil Protection and Crisis Management Nikos Chardalia and the representative for the new coronavirus of Ministry of Health, Professor Sotiris Tsiordas” (Ενημέρωση διαπιστευμένων συντακτών υγείας από τον Υφυπουργό Πολιτικής Προστασίας και Διαχείρισης Κρίσεων Νίκο Χαρδαλιά και τον εκπρόσωπο του Υπουργείου Υγείας για το νέο κορωνοϊό, Καθηγητή Σωτήρη Τσιόδρα), Press release, 15 March 2020, available in Greek at <https://www.civilprotection.gr/el/enimerosi-diapisteymenon-syntakton-ygeias-apo-ton-yfyoyrgo-politikis-prostasias-kai-diaheirisis-0>

²⁴ According to Art. 9 para. 1 of the Act of Legislative Content O.G A’ 64/14-3-2020

²⁵ Greece, General Secretariat of Civil Protection (GGPP) (Γενική Γραμματεία Πολιτικής Προστασίας, Γ.Γ.Π.Π). “Update to accredited health journalists by Deputy Minister of Civil Protection and Crisis Management Nikos Chardalia and the representative for the new coronavirus of Ministry of Health, Professor Sotiris Tsiordas” (Ενημέρωση διαπιστευμένων συντακτών υγείας από τον Υφυπουργό Πολιτικής Προστασίας και Διαχείρισης Κρίσεων Νίκο Χαρδαλιά και τον εκπρόσωπο του Υπουργείου Υγείας για το νέο κορωνοϊό, Καθηγητή Σωτήρη Τσιόδρα), Press release, 15 March 2020, available in Greek at <https://www.civilprotection.gr/el/enimerosi-diapisteymenon-syntakton-ygeias-apo-ton-yfyoyrgo-politikis-prostasias-kai-diaheirisis-0>

need for the states to ensure the effective access of individuals to the asylum procedure despite all the health measures taken to tackle the Coronavirus COVID-19 outbreak.²⁶ Based on the above press release, the government is in the process of imposing restrictions on the movement of persons residing in Reception and Identification Centers (RICs) (*Κέντρα Υποδοχής και Ταυτοποίησης, Κ.Υ.Τ*) on the Greek islands as well. The Ministry of Migration and Asylum (*Υπουργείο Μετανάστευσης και Ασύλου*) specified the precautionary measures to be applied in RICs including compulsory temperature taking, information documents in all languages and the operation of special confinement spaces within the RICs for infected persons.²⁷ Medecins Sans Frontieres report on the need to evacuate refugee camps on the Greek islands as unhygienic conditions and overcrowding pose a real threat to public health.²⁸ However, the relevant Joint Ministerial Decision of 22 March regarding the measures within refugee camps and reception centres does not include any measures of evacuation or construction of new facilities in order to relieve the overcrowded centres.²⁹

1.3 Disruption of education and work

Private and public educational and academic institutions closed on 10 March 2020 until 24 March initially³⁰ and an extension until 10 April 2020 was decided by way of Joint Ministerial Decision on 21 March 2020³¹. On 16 March 2020 the Ministry of Education and Religious Affairs (*Υπουργείο Παιδείας και Θρησκευμάτων*) announced through its website the launch of a pilot project of remote schooling using a digital online application, Webex Meetings.³² The pilot project is launched on 17 March 2020 in 16 areas in Greece and will be gradually implemented in all senior high schools (*λύκεια*) in Greece. The announcement ensures that the project will be accessible to students also through landlines for those

²⁶ UN High Commissioner for Refugees (UNHCR), Key Legal Considerations on access to territory for persons in need of international protection in the context of the COVID-19 response, 16 March 2020, available at: <https://www.refworld.org/docid/5e7132834.html> [accessed 24 March 2020]

²⁷ Greece, Ministry of Migration and Asylum (*Υπουργείο Μετανάστευσης και Ασύλου*) “Coronavirus protection measures at Reception and Identification Centers, Accommodation facilities and the Asylum Service” (*Μέτρα προστασίας από τον κορωνοϊό στα Κέντρα Υποδοχής και Ταυτοποίησης, στις δομές φιλοξενίας και στην Υπηρεσία Ασύλου*), Press release, 18 March 2020, available in Greek at <https://bit.ly/33JHulO>

²⁸ Greece, Medecins sans Frontieres “Evacuation of squalid Greek camps more urgent than ever over COVID-19 fears”, 12-3-2020 available in Greek at <https://www.msf.org/urgent-evacuation-squalid-camps-greece-needed-over-covid-19-fears>

²⁹ Greece, Ministries of Citizen Protection, Health and Migration and Asylum, Joint Ministerial Decision No D1a/GP.oik.. 2003 O.G B’ 985/22-3-2020 on “Measures against the emergence and contagion of coronavirus COVID-19 at Reception and Identification Centers throughout Greece, for the period from 21.03.2020 to 21.04.2020.” (Λήψη μέτρων κατά της εμφάνισης και διασποράς κρουσμάτων του κορωνοϊού COVID-19 στα Κέντρα Υποδοχής και Ταυτοποίησης, στο σύνολο της Επικράτειας, για το χρονικό διάστημα από 21.03.2020 έως και 21.04.2020.) available in Greek at <https://bit.ly/2UdKQKM>

³⁰ Greece, Ministries of Development and Investments, Citizen Protection, Education and Religious Affairs, Labor and Social Affairs, Health, Culture and Sports, Interior, Joint Ministerial Decision “on the imposition of temporary closure of [...] educational institutions [...] 11.3.2020 until 24.3.2020.” (*Επιβολή του μέτρου της προσωρινής απαγόρευσης λειτουργίας [...] εκπαιδευτικών δομών [...] 11.3.2020 έως και 24.3.2020.*), No D1a/GP.oik 16838, O.G B’ 783/10-3-2020(O.G B’ 783/10-3-2020), available in Greek at <https://bit.ly/3dkgm1r>

³¹ Greece, Joint Ministerial Decision No D1a/GP.oik. 20021 of the Ministries of Development and Investments, Citizen’s Protection, Education and Religious Affairs, Labor and Social Affairs, Health, Culture and Sports, Interior, O.G B’ 956/21-3-2020, on “Imposition of the measure of the temporary closure of kindergartens, nurseries, school units, higher education institutions, centers of foreign languages, tutoring centres and all kinds of educational facilities both public and private [...] abroad for the period from 21.3.2020 to 10.4.2020.” (*Επιβολή του μέτρου της προσωρινής απαγόρευσης λειτουργίας των βρεφονηπιακών και παιδικών σταθμών, νηπιαγωγείων, σχολικών μονάδων, ανωτάτων εκπαιδευτικών ιδρυμάτων, κέντρων ξένων γλωσσών, φροντιστηρίων και πάσης φύσεως εκπαιδευτικών δομών, φορέων και ιδρυμάτων, δημοσίων και ιδιωτικών [...] για το χρονικό διάστημα από 21.3.2020 έως και 10.4.2020.*) available in Greek at <https://bit.ly/3bhhPnc>

³² Greece, Ministry of Education and Religious Affairs (*Υπουργείο Παιδείας και Θρησκευμάτων*), Guidelines on remote schooling, available in Greek at https://www.minedu.gov.gr/%CE%A5%CE%A0%CE%91%CE%99%CE%98_%CE%9F%CE%B4%CE%B7%CE%B3%CE%AF%CE%B5%CF%82.pdf

who have no internet connection or smart devices. The procedure for access by phone will be announced within a week following the launch of the pilot project.

With regard to employment, a special purpose leave is mandated specifically for parents of children or adult persons with disabilities attending school for as long as the schools are closed³³. Depending on the type of contract and nature of services offered, workers can claim this leave either interchangeably with their partner or individually. It can be claimed by public servants³⁴ healthcare providers with any type of contract³⁵ and private sector employees.³⁶ Other measures related to working conditions include the possibility to work remotely, the preventive decontamination of working spaces and the temporary closure of spaces exposed to infected patients.³⁷ Act of 14 March 2020 allows producers, distributors and retailers of food and medicine to operate outside of the established working hours and days without prejudice to the maximum allowed working hours per day and week.³⁸

To ensure effective information of the public and the reporting of violations of workers' rights, the General Confederation of Greek Workers (GSEE) (*Γενική Συνομοσπονδία Ελλήνων Εργατών, Γ.Σ.Ε.Ε*) launched a platform called "ANTI-COVID-19 Group of Information and Support for Workers" (*"ANTI-COVID-19 Ομάδα Πληροφόρησης και Υποστήριξης Εργαζομένων"*) which has reportedly received a large number of requests and complaints since its launch on 18 March 2020.³⁹

Most requests and complaints submitted to this platform are relevant the non compliance of employers in terms of granting the special purpose leave to their employees, of businesses converting full-time contracts to part-time or granting unpaid leave instead, of businesses remaining open despite the ban, of non-adoption of decontamination measures, of excession of the maximum amount of working hours in the supermarket industry. As regards call centers companies in particular continue to keep their large amount of employees crowded in one space without respect to health precaution measures.⁴⁰

2. Impact of the outbreak on certain national or ethnic communities

Incidents of xenophobic speech, acts of harassment or violent attacks have neither been portrayed in headline news nor have been reported by public authorities or the civil society through their official websites. The Racist Violence Recording Network (RVRN) (*Δίκτυο καταγραφής ρατσιστικής βίας*) which consists of 46 human rights organisations and receives and records complaints, has not reported concerns about racist incidents deriving from or related to the Coronavirus outbreak.⁴¹ The same stands for the Greek National Human Rights Commission (GNCHR) (*Εθνική Επιτροπή για τα δικαιώματα του ανθρώπου, ΕΕΔΑ*), the independent advisory body of the state on human rights issues⁴², the Greek

³³ Art. 4 para. 3a of Act of Legislative Content O.G A' 55/11-3-2020

³⁴ Art. 5 of Act of Legislative Content O.G A' 55/11-3-2020

³⁵ Art. 11 of Act of Legislative Content O.G A' 64/14-3-2020

³⁶ Art. 4 para. 3 of Act of Legislative Content O.G A' 64/14-3-2020

³⁷ Greece, Ministry of Labor and Social affairs (*Υπουργείο Εργασίας και Κοινωνικών Υποθέσεων*), Measures on coronavirus (*Μέτρα για τον κορονοϊό*), Press release , 9 March 2020 available in Greek at <https://www.ypakp.gr/uploads/docs/12303.pdf>

³⁸ Art. 16 of Act of Legislative Content O.G A' 64/14-3-2020

³⁹ The platform is accessible through this link: https://gsee.gr/?page_id=36762

⁴⁰ Greece, General Confederation of Greek Workers (GSEE) (*Γενική Συνομοσπονδία Ελλήνων Εργατών, Γ.Σ.Ε.Ε*), "TSUNAMI OF QUESTIONS AND COMPLAINTS IN THE ANTI-COVID-19 GSEE Group of Information and Support for Workers" (*ΤΣΟΥΝΑΜΙ ΕΡΩΤΗΜΑΤΩΝ ΚΑΙ ΚΑΤΑΓΓΕΛΙΩΝ ΣΤΗΝ ANTI COVID 19 ΟΜΑΔΑ ΤΗΣ ΓΣΕΕ*), Press release, 19 March 2020, available at <https://gsee.gr/?p=36794>

⁴¹ The Racist Violence Recording Network (RVRN) was established in 2011 by the Greek National Commission for Human Rights and the Greek Office of UNHCR, the UN Refugee Agency. Today, RVRN consists of 46 non-governmental organizations and civil society actors, as well as the Greek Ombudsman and the Migrants' Integration Council of the Municipality of Athens. More information is available here: <http://rvrn.org>

⁴² The Greek National Commission for Human Rights (GNCHR) is the independent advisory body to the

Ombudsman (*Συνήγορος του Πολίτη*)⁴³ and the Hellenic Police (*Ελληνική Αστυνομία, ΕΛ.ΑΣ*) through its 68 offices that receive complaints relevant to racist behaviour.⁴⁴ The Greek Department of Amnesty International (*Διεθνής Αμνηστία, ελληνικό τμήμα*) has not reported any relevant issues either.

3. Impact on privacy and spread of disinformation

3.1 Privacy

Article 5 of act O.G A' 64/14-3-2020 mandates the collection of personal data of potentially or actually infected persons by the Hellenic National Public Health Organization (EODY) (*Εθνικός Οργανισμός Δημόσιας Υγείας, Ε.Ο.Δ.Υ*) for the purpose of sharing it with the General Secretariat for Civil Protection (GGPP) (*Γενική Γραμματεία Πολιτικής Προστασίας, Γ.Γ.Π.Π*). The data shared with G.G.P.P will be anonymised and its transmission encrypted. The processing of the data is limited to purpose of coordination between EODY and GGPP for the effective response to the negative impact of Coronavirus-COVID 19. It was reported⁴⁵ that the Data Protection Officer of the First Regional Health Directorate of Attica (1st YPE) (*Πρώτη Υγειονομική Περιφέρεια Αττικής, 1η Υ.Π.Ε*) requested permission to install cameras in hospitals in order to monitor the patients of Coronavirus COVID-19. The Data Protection Officer of the Ministry of Health denied permission on the grounds that the use of cameras is not justified.

The Hellenic Data Authority (*Αρχή Προστασίας Δεδομένων Προσωπικού Χαρακτήρα, Α.Α.Π.Δ.Π.Χ*) issued a press release reporting on the decisions adopted at its board meeting.⁴⁶ It was maintained that all rights consolidated in Regulation (EU) 2016/679 on data protection must be respected while critical public health and safety risks are taken into consideration. The press office disseminated Coronavirus-COVID-19-specific guidelines regarding data protection issues.⁴⁷

To this moment, only details of the first deceased were mentioned in the media. In particular, the name, age and personal details such as his professional background, studies and family status were presented in newspapers along with his photos. It is worth to mention that he was a public figure in a local community as he was involved in the local government.⁴⁸ As far as the other incidents of contraction or deaths due to the Coronavirus COVID-19 are concerned, these have been reported by only revealing the age, the gender and the place of permanent residence of the patients or the deceased individuals. Other identifying personal data such as name, occupation, address, social security number or phone number have not been published at all.

state on matters pertaining to human rights protection and promotion and was established by Law 2667/1998 whereas it was set up in plenary on 10th January 2000. More information is available here: www.nchr.gr

⁴³ The Greek Ombudsman is an independent authority sanctioned by the Greek Constitution. It has been in operation since October 1, 1998 and its role is to mediate between public administration and civilians in order to help them in exercising their rights effectively. More information available here: www.synigoros.gr

⁴⁴ Greece, On the initiative of the Ministry of Public Order and Citizen Protection, competent services engaged in the fight against racial violence were established all over Greece. Pursuant to Presidential Decree 132/2012, as amended by Presidential Decree 178/2014, two (2) Departments and sixty-eight (68) Offices for dealing with racial violence were established all over Greece.

⁴⁵ Greece, Law-spot, "Personal Data and Coronavirus: Can Hospitals Use Webcams in Wards and Wider Areas?", 12 March 2020 available at <https://www.lawspot.gr/nomika-nea/prosopika-dedomena-kai-koronoios-mporoynta-nosokomeia-na-hrisimopoioun-kameres-se>

⁴⁶ Greece, Hellenic Data Authority (*Αρχή Προστασίας Δεδομένων Προσωπικού Χαρακτήρα, Α.Α.Π.Δ.Π.Χ*) "Press release for the processing of personal data under the management of COVID-19" (Δελτίο Τύπου για την επεξεργασία δεδομένων προσωπικού χαρακτήρα στο πλαίσιο της διαχείρισης του COVID-19), Press release, 18 March 2020, available at https://www.dpa.gr/portal/page?_pageid=33,15131&_dad=portal&_schema=PORTAL

⁴⁷ Greece, Hellenic Data Authority (*Αρχή Προστασίας Δεδομένων Προσωπικού Χαρακτήρα, Α.Α.Π.Δ.Π.Χ*) "specific guidelines regarding data protection issues in the framework of COVID-19", available in Greek at <https://www.dpa.gr/APDPXPortlets/htdocs/documentSDisplay.jsp?docid=163,39,44,101,194,223,3,99>

⁴⁸ Greece, Proto Thema, "Coronavirus-The first death recorded in Greece: Manolis Agiomurgiannakis, from Amaliada lost the battle with covid-19", 12 March 2020, available at <https://www.protothema.gr/greece/article/983642/koronoios-protos-nekros-stin-ellada-ehase-tin-mahi-o-manolis-agiomurgiannakis-apo-tin-amaliada/>

3.2 Information

All radio and TV stations are obliged to transmit one-minute-long information messages on the prevention of the spread of the Coronavirus COVID-19.⁴⁹ Individuals can also be informed about the virus and its impact through 1135, a new 24-hour telephone line designed to answer questions of the general public.

The Journalists' Union of Athens Daily Newspapers (*Ένωσις Συντακτών Ημερήσιων Εφημερίδων Αθηνών, Ε.Σ.Η.Ε.Α*) issued an announcement on 18 March 2020 reminding all press stakeholders of their obligations with regard to factual reporting, abstinence from spreading fake news and compliance to journalistic deontology.⁵⁰ However, incidents of fake news and misinformation have been reported. In specific, according to news articles, on 6 March 2020, the Minister of Health pressed charges against a newspaper for spreading fake news (*Διασπορά ψευδών ειδήσεων*), and offence according to article 191 of the Penal Code (*Ποινικός Κώδικας*). Further, the National Council for Radio and Television (NCRTV) (*Εθνικό Συμβούλιο Ραδιοτηλεόρασης, Ε.Σ.Ρ*) also received complaints against a TV station which advertised a commercial ointment as minimising the risk of Coronavirus COVID-19 contamination. NCRTV immediately initiated disciplinary procedures against the TV station.⁵¹

⁴⁹ Art. 21 of Act of Legislative Content O.G A' 55/11-3-2020 and Art 31 of Act of Legislative Content O.G A' 64/14-3-2020

⁵⁰ Greece, Journalists' Union of Athens Daily Newspapers (*Ένωσις Συντακτών Ημερήσιων Εφημερίδων Αθηνών, Ε.Σ.Η.Ε.Α*) "The Role of Journalists and the Responsibilities of Media Owners to Inform the Public" (*Ο ρόλος των δημοσιογράφων και οι ευθύνες των ιδιοκτητών των Μέσων Ενημέρωσης για την ενημέρωση του κοινού*), 18 March 2020, available in Greek at <https://www.esiea.gr/o-rolos-ton-dimosiografon-kai-oi-eythyn/>

⁵¹ Greece, National Council for Radio and Television (NCRTV) (*Εθνικό Συμβούλιο Ραδιοτηλεόρασης, Ε.Σ.Ρ*), "Announcement about a product that allegedly prevents Covid-19 coronavirus infection" (*Ανακοίνωση σχετικά με προϊόν που δήθεν αποτρέπει μόλυνση από τον κορωνοϊό Covid-19*), Press release 11 March 2020, available in Greek at <https://bit.ly/33GoJ2Z>