



GREECE

MAINSTREAM STRATEGY ON ACCESSIBILITY

National Action Plan on Accessibility in place

NO – accessibility initiatives contained in a broad action plan

Additional information:

The <u>National Action Plan (NAP) for the Rights of Persons with Disabilities (2020)</u> includes 6 pillars and 30 goals, of which Pillar 3 concerns accessibility and includes the following goals:

- Goal 20: Accessibility of the Natural and Built Environment
- Goal 21: Accessibility of Transport and Mobility of the Individual
- Goal 22: Accessibility of Goods and Services
- Goal 23: Digital Accessibility
- Goal 24: Communication, Information, Access to Information

The NAP is a 'road map' that provides a clear, coherent, and systematic framework for action mainly for the period 2020-2023. It also sets specific deadlines for the implementation of the actions, many of which have not been met. Today the NAP is in the updating phase. The implementation of the NAP is monitored by the Coordinating Mechanism of article 33 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD).

Additionally, the Ministry of Environment and Energy, responding to the identified need for an integrated and holistic strategy for the accessibility in the urban and extra-urban environment developed a "National Plan for Accessibility with emphasis on climate change-climate crisis" (ESPeKA) (2023). The ESPeKA interconnects two major issues related to the natural and the built environment, which are: the seamless and autonomous access of all citizens without discrimination and the accompanying and/or complementary actions, measures and projects that will make the required interventions environmentally friendly (in the context of sustainability). In part D of the Plan, the proposals are specified and the required tools and incentives for their implementation are presented, reflected in an ACTION PLAN: The Plan concerns all citizens and aims at changes and interventions (a) of legislative content in a short-term





	horizon 7 years and (b) implementation with measures, projects and actions in a (b.1.) short-term horizon of 7 years and (b.2.) long-term horizon of 20 years with the utilization of all available National and European financial tools and with recipients of the public and the private sector. The ESPeKA: • provides instructions and directions on all matters, • specialises in individual categories of uses and spaces, • provides responsibilities and procedures for control and approval of studies and projects and • relates studies, projects and actions to financial instruments and programmes.
Authority monitoring	YES – accessibility initiatives led by a cross-group of authorities
accessibility	Additional information:
initiatives in place	Additional information:
	For Greece, the Minister of State has been designated as the Coordinating Mechanism, responsible for the coherence of the government work (according to article 69 of Law 4488/2017). Regarding the implementation and revision of the National Action Plan (NAP) for the Rights of Persons with Disabilities (2020), the National Accessibility Authority, an advisory body of the State for the purpose of access of persons with disabilities in all areas of human activity, collaborates with the Coordinating Mechanism (law 4780/2021, articles 1 and 2).
Adoption of target	YES – several target dates
dates to achieve	
accessibility	
initiatives Infringement and	YES
sanction regime on	
equal opportunities,	Additional information:
non-discrimination	
and accessibility for	





people with disabilities in place

Although only from 1st of April 2023, it became mandatory for all new building permits to draw up an accessibility study under the responsibility of the engineer, all new buildings except residential buildings, which have been erected with a building permit since 9/4/2012, (which is the date of application of Law 4067/2012 onwards), had to be accessible, while residential buildings had to have accessible common areas in order to be visitable by anyone. In parallel in existing buildings receiving public of the private or public area, which have been erected with a building permit before 9/4 /2012 works must also have been done and accessibility rules must be observed according to a special Ministerial Decision. According to article 26 of Law 4067/2012, buildings that do not adapt to the requirements set by the law will be considered in breach of the law. The suspension of sanctions initially ended on 31.12.2020, was extended for two years until 31/12/2022 and then a new three-month extension was instituted until 31 March 2023. With a recent ministerial decision it was extended until 31.03.2024.

Public Body that manages complaint about accessibiliy in place

YES

Additional information:

There is not a unified body in Greece that accepts complaints about accessibility issues in all sectors.

The <u>Greek Ombudsman Independent Authority</u> often receives relevant complaints from citizens on issues of accessibility.

In the framework of the Horizontal Enabling Condition on the implementation of the United Nations Convention on the Rights of Persons with Disabilities, a complaints mechanism is currently being established, which is foreseen in the «Regulation (EU) 2021/1060 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy». Citizens can refer to this mechanism, when they find that projects co-financed by the European Union Funds in the context of the implementation of





	the Partnership Agreement with Greece (National Strategic Reference Framework – NSRF) 2021-2027 do not apply what is dictated by the United Nations Convention on the Rights of Persons with Disabilities. According to article 50 of Law 4914/2022, the General Secretariat of Public Investments and ESPA of the Ministry of Development and Investments, through the Special Service for Institutional Support and Information Systems (ETHYPS), is responsible for the Management and Control System(s) (SDE) of the Operational Programmes of the Partnership Agreement with Greece (NSRF) 2021-2027 to ensure the examination of complaints that fall within the scope of the Programmes. Additionally, the law provides that the registration of complaints, the exchange of information and the transmission of relevant documents are carried out electronically through the Integrated Information System of the Partnership Agreement with Greece (NSRF) 2021-2027.		
	Finally, in the framework of the imple disabilities, complaints are also accepted. For passengers' rights when traveling by air		assengers with
	For passengers' rights when traveling by bus and coach	The establishment of a single Transport Regulatory Authority, which will also include the Railway Regulatory Authority, is pending	
	For passengers' rights when traveling by train	Railway Regulatory Authority (PAΣ)	
	For the rights of passengers when traveling by ship	Ministry of Maritime Affairs and Insular Policy - State-Citizen/Business Relations Department	
Umbrella organisation representing more than 50% of associations for	YES Additional information:		





persons with disabilities in place

The National Confederation of Disabled People (NCDP) is the umbrella organization of the Greek disability movement that was founded and established in 1989. Through the Confederation all categories of persons with disabilities and chronic diseases are represented, as well as the parents/guardians of those persons with disabilities who cannot represent themselves. The Confederation has a wide network of secondary member-organisations (Federations) across the country which together with their primary member organisations (associations) amount to over 550. Only persons with disabilities, persons with chronic diseases and family members have the right to vote and be elected in all organs of the Confederation. The Confederation is a member of the European Disability Forum (EDF), and it has been very active in EDF's work and through EDF in the work of the International Disability Alliance (IDA). The NCDP is also a member of the Greek National Commission for Human Rights, of the Greek Economic and Social Council of Greece and the European Economic and Social Committee. Also, the representation of the Greek disability movement through NCDP and its members in all relevant agencies, bodies, and committees is guaranteed by law. For example, NCDP is a member of all monitoring committees of the European structural funds in Greece with a voting right.

International accessibility standards incorporated into the national legislative framework

YES

Additional information:

Accessibility specifications have been included in the legal framework for the built environment, transport, development (development law, NSRF legislative framework). These are the national specifications (since the 1990s) that have been based on international specifications, such as those of the Americans with Disabilities Act-ADA, the EN 81-70 standard on lift controls, etc., which are however, generally compatible with EN-17210. It should be noted that EN 17210 was published in 2021 (in English) and therefore it has not been widely considered until now, given this short time period.

In addition, ELOT (Hellenic Organization for Standardization) has developed the national standard ELOT 1439:2013 "Organization friendly to citizens with disabilities -Requirements and recommendations", which resulted from the cooperation of ELOT with the National Confederation of Disabled People (NCPD).





Certification Body for accessible environments, products, or services in place	NO
Mandatory requirement regarding accessibility courses at post-secondary level in place	NO

BUILT ENVIRONMENT	
Legislation requiring public buildings to be accessible in	YES – not based on the European Standard – EN 17210:2010 Accessibility and usability of the built environment
place	Additional information:
	There is the law 4067/2012 "New Building Regulation" as amended by laws 4759/2020-articles 117 to 120 and 4782/2021-article 210. At the same time, there are the Planning Guidelines "Designing for all" of the Ministry of Environment and Energy and a series of Ministerial Decisions that regulate individual issues (e.g. Ministerial Decree no. YPEN/DMEAAP/99709/796/2021 (B'5045) "Technical Specifications for Accessibility Study", Ministerial Decree no. YPEN/DESEDP/65826/699 /2020 (B' 2998) "Technical instructions for the adaptation of existing buildings and infrastructures for their accessibility to persons with disabilities and persons who encounter barriers, in accordance with the applicable legislation", etc.). In addition, a programme, including a short training course for engineers, has been developed, to ensure the accessibility of public buildings (collaboration of the Ministry of Environment and Energy, the Technical Chamber of Greece and NCPD-E.S.A.me.A). It should be noted that EN 17210 was published





	in 2021 (in English) and therefore it has not been widely considered until now, given this short time period. Links: • Technical Chamber of Greece
	Ministry of Environment and Energy
Action plan on accessibility related to built environment	NO – accessibility initiatives related to built environment are contained in a broad action plan Additional information:
in place	The National Action Plan (NAP) for the Rights of Persons with Disabilities (2020) includes 6 pillars and 30 goals, of which Pillar 3 concerns accessibility and includes the following goal: • Goal 20: Accessibility of the Natural and Built Environment
	In addition, the "Urban Accessibility Plans" program is in progress (see related law 4819/2021-article 126 par.10, YA with housing no. YPEN/DMEAAP/110088/887/2021 (B' 5553) "Specifications, terms and technical instructions for the preparation of an "Urban Accessibility Plan (S.A.P.)"
Authority monitoring the action plan on	NO – accessibility initiatives related to built environment are contained in a broad action
accessibility related to built environment in place	For Greece, the Minister of State has been designated as the Coordinating Mechanism, responsible for the coherence of the government work (according to article 69 of Law 4488/2017). Regarding the implementation and revision of the National Action Plan (NAP) for the Rights of Persons with Disabilities
iii piace	(2020), the National Accessibility Authority, an advisory body of the State for the purpose of access of persons with disabilities in all areas of human activity, collaborates with the Coordinating Mechanism (law 4780/2021, articles 1 and 2).





Adoption of target dates to achieve accessibility initiatives related to built environment	YES
Official data on public buildings complying with EN17210:2010 available	Additional information: No official data available, but data concerning the accessibility of those buildings will result from the completion of the programme to ensure the accessibility of public buildings (collaboration of the Ministry of Environment and Energy, the Technical Chamber of Greece and NCPD-ESAMeA) referred to in question 8 above. Most of the 30,000 buildings where services of public interest are provided, have been assessed and the evaluation of their accessibility, according to the Greek legislation and guidelines, has begun with the aim of studying and implementing the necessary interventions. Link: Technical Chamber of Greece

	TRANSPORT	
Action plan on accessibility related	NO – accessibility initiatives related to public transport are contained in a broad action plan	
to public transport in place	There is a National Action Plan (NAP) for the Rights of Persons with Disabilities (2020), which includes 6 pillars and 30 goals, of which Pillar III concerns accessibility and includes the following goal: • Goal 21: Accessibility of Transport and Mobility of the Individual	





Authority monitoring the action plan on accessibility related to public transport in place	NO – accessibility initiatives related to public transport are contained in a broad action plan For Greece, the Minister of State has been designated as the Coordinating Mechanism, responsible for the coherence of the government work (according to article 69 of Law 4488/2017). Regarding the implementation and revision of the National Action Plan (NAP) for the Rights of Persons with Disabilities (2020), the National Accessibility Authority, an advisory body of the State for the purpose of access of persons with disabilities in all areas of human activity, collaborates with the Coordinating Mechanism (law 4780/2021, articles 1 and 2).
Adoption of target dates to achieve accessibility initiatives related to public transport	YES
Legislation in place regulating built environment accessibility conditions in airport infrastructures	YES – not based on the European Standard – EN 17210:2010 Accessibility and usability of the built environment Additional information: All building infrastructure is subject to Law 4067/2012 "New Building Regulation" as amended by Laws 4759/2020-articles 117 to 120 and 4782/2021-article 210. At the same time, there are the Ministry's "Designing for All" Planning Guidelines of the Environment and a series of Ministerial Decisions that regulate individual issues (e.g. Ministerial Decree no. YPEN/DMEAAP/99709/796/2021 (B'5045) "Technical Specifications for Accessibility Study", Ministerial Decree no. YPEN/DESEDP/65826 /699/2020 (B' 2998) "Technical instructions for the adaptation of existing buildings and infrastructures for their accessibility to persons with disabilities and persons who encounter barriers in accordance with the applicable legislation", etc.). These are national specifications (since the 1990s) that have been based on international specifications, such as those of the Americans with Disabilities Act-ADA, EN 81-70 standard, etc., which are however, generally compatible with EN-17210.





Legislation in place
regulating built
environment
accessibility
conditions in railway
infrastructures

YES – not based on the regulations established by PRM TSI NIP (TSI 1300/2014) and the European series of standards EN 16584, EN 16585, EN 16586 and EN 16587

Additional information:

All building infrastructure is subject to Law 4067/2012 "New Building Regulation" as amended by Laws 4759/2020-articles 117 to 120 and 4782/2021-article 210. At the same time, there are the Ministry's "Designing for All" Planning Guidelines of the Environment and a series of Ministerial Decisions that regulate individual issues (e.g. Ministerial Decree no. YPEN/DMEAAP/99709/796/2021 (B'5045) "Technical Specifications for Accessibility Study", Ministerial Decree no. YPEN/DESEDP/65826 /699/2020 (B' 2998) "Technical instructions for the adaptation of existing buildings and infrastructures for their accessibility to persons with disabilities and persons who encounter barriers in accordance with the applicable legislation", etc.). These are national specifications (since the 1990s) that have been based on international specifications, such as those of the Americans with Disabilities Act-ADA, EN 81-70 standard, etc.

Legislation in place regulating accessibility conditions of sea and inland waterway ports

YES – not based on the European Standard – EN 17210:2010 Accessibility and usability of the built environment

Additional information:

All building infrastructure is subject to Law 4067/2012 "New Building Regulation" as amended by Laws 4759/2020-articles 117 to 120 and 4782/2021-article 210. At the same time, there are the Ministry's "Designing for All" Planning Guidelines of the Environment and a series of Ministerial Decisions that regulate individual issues (e.g. Ministerial Decree no. YPEN/DMEAAP/99709/796/2021 (B'5045) "Technical Specifications for Accessibility Study", Ministerial Decree no. YPEN/DESEDP/65826 /699/2020 (B' 2998) "Technical instructions for the adaptation of existing buildings and infrastructures for their accessibility to persons with disabilities and persons who encounter barriers in accordance with the applicable legislation", etc.). These are national specifications (since the 90s) that have been based on





	international specifications, such as those of the Americans with Disabilities Act-ADA, EN 81-70 standard, etc., which are however, generally compatible with EN-17210
Legislation in place regulating accessibility	YES – not based on the European Standard – EN 17210:2010 Accessibility and usability of the built environment
conditions of bus and coach transport	Additional information:
infrastructure	All building infrastructure is subject to Law 4067/2012 "New Building Regulation" as amended by Laws 4759/2020-articles 117 to 120 and 4782/2021-article 210. At the same time, there are the Ministry's "Designing for All" Planning Guidelines of the Environment and a series of Ministerial Decisions that regulate individual issues (e.g. Ministerial Decree no. YPEN/DMEAAP/99709/796/2021 (B'5045) "Technical Specifications for Accessibility Study", Ministerial Decree no. YPEN/DESEDP/65826 /699/2020 (B' 2998) "Technical instructions for the adaptation of existing buildings and infrastructures for their accessibility to persons with disabilities and persons who encounter barriers in accordance with the applicable legislation", etc.). These are national specifications (since the 90s) that have been based on international specifications, such as those of the Americans with Disabilities Act-ADA, EN 81-70 standard, etc., which are however, generally compatible with EN-17210. Intercity buses are not accessible, unlike city buses.
National Enforcement Bodies in place to monitor	YES Additional information:
and enforce compliance with Passenger Rights Regulations	 Air: <u>Civil Aviation Authority</u> Bus and Coach: The establishment of a single Transport Regulatory Authority, which will also include the Railway Regulatory Authority, is pending Railways: <u>Railway Regulatory Authority (PAΣ)</u> Maritime: <u>Ministry of Maritime Affairs and Insular Policy - State-Citizen/Business Relations Department</u>





There are also Committees related to ensuring infrastructure accessibility in various Ministries such as:

- Central Accessibility Committee at the Ministry of Environment and Energy
- Regional Accessibility Committees (i.e. at the level of Regions)
- Committee on issues of persons with disabilities in the Ministry of Infrastructure and Transport
- Advisory body for the examination of the practical issues related to the accessibility of people with disabilities in the entire spectrum of coastal transport and the proposal of measures to improve this to the Ministry of Shipping

Additional link:

• National Enforcement Bodies for Passenger Rights

ICT	
Entity responsible for	YES
accessibility compliance of public websites and	Additional information:
applications in place	 Monitoring and reporting: Ministry of Digital Governance, General Secretariat of Digital Governance and Simplification of Procedures, Directorate of Digital Strategy, Department of eAccessibility and Social Affairs Enforcement: Ministry of Digital Governance, General Secretariat of Digital Governance and Simplification of Procedures, Directorate of Digital Strategy
	Link:
	Member States' bodies in charge of monitoring the Web Accessibility Directive





Results of accessibility compliance test son public websites and applications published

YES

Additional information:

The Digital Strategy Directorate of the Ministry of Digital Governance has already prepared the 1st Monitoring Report of the Digital Accessibility of Websites & Applications for mobile devices of Public Bodies & Organizations in Greece. This report covers the period 1 JAN 2020 – 22 DEC 2021. Before its completion, the report was sent out for public consultation on the open government website from 6/4/2022 to 20/4/2022. The National Confederation of Disabled People participated in the consultation by sending their comments. The National Accessibility Authority also sent comments. The report has been posted on the website of the Ministry of Digital Governance. It is worth noting that the Ministry of Digital Governance had approached the National Confederation of Disabled People as well as the Ombudsman requesting websites and mobile applications that they considered important in order to form the monitored sample.

Additional link:

Web Accessibility Directive - Monitoring reports

Action plan on accessibility related to ICT in place

NO – accessibility initiatives related to ICT are contained in a broad action plan

Additional information:

There is the <u>Digital Transformation Strategy 2020-2025</u> prepared by the Ministry of Digital Governance in 2021. The Strategy is a record of the necessary interventions in the technological infrastructure of the state, in the education and training of the population for the acquisition of digital skills as well as in the way Greece uses digital technology in all sectors of the economy and public administration. The vision, philosophy and goals of the national strategy for the digital transformation of the country are described in the Strategy. One of its guiding principles is "removal of barriers and universal accessibility". In the framework of this guiding principle it is pointed out that "redesigned digital services should be accessible to all and not only to selected population groups that are digitally literate". In addition, the Strategy includes





	some horizontal interventions, one of which is the strengthening of digital accessibility. The projects included in it are divided into medium-term and short-term. The total of these amounts to 475. The website where the Strategy is presented has not been updated since December 2022. Therefore, there is a lack of information concerning the implementation of the projects. What we know is that of the 475 projects, 146 are in the implementation phase. It is worth mentioning that the creation of this particular website is part of the monitoring of Strategy implementation.
Authority monitoring the action plan on accessibility related to ICT in place	NO – accessibility initiatives related to ICT are contained in a broad action plan The following authorities are involved in monitoring the implementation of the <u>Digital Transformation Strategy 2020-2025</u> : a) the Ministry of Digital Governance, b) the Coordinating Committee for Digital Transformation (Article 7, Law 4727/2020), which is distinguished in plenary (in which all the General and Special Secretaries of the Government participate and which is presided over by the Minister of Digital Governance) and Departments (which are defined by policy sector by decision of the Minister of Digital Governance and are made up, as the case may be, of the Specialists and General Secretariat of the Government, those in charge of digital actions, etc.) and c) the Observatory of Digital Transformation.
Adoption of target dates to achieve accessibility initiatives related to ICT	YES

Public Policies / Data Availability			
The inclusion of	YES		
people with			





disabilities, particularly Universal Accessibility and Design for All, is promoted in the transposed laws of Directives 2014/24 and 2014/25

Additional information:

Article 54 "Technical specifications" and Annex VII of Law 4412/2016 - by which our national legislation was adapted to Directives 2014/24 and 2014/25 - as amended by Article 17 of Law 4782/2021 and in force, includes a reference to the obligation to draw up the technical specifications in a way that takes into account accessibility criteria for people with disabilities.

More specifically, the following is stated: "[...] The technical specifications may also determine whether the transfer of intellectual property rights is required. For all contracts intended for use by natural persons, whether it is the general public or the staff of the contracting authority, the technical specifications are drawn up in such a way as to take into account accessibility criteria for people with disabilities or Design for All. If mandatory accessibility requirements have been adopted by virtue of a legislative act of the Union, the technical specifications, as regards accessibility criteria for persons with disabilities or Design for All, shall be determined by reference to those requirements [...]'.

Online Accessibility
Information Schemes
(AIS) in place at
national or regional
level to inform the
public about the
accessibility of
public-use buildings,
ICT products or
services

NO

Additional information:

There is no systematic information at the national level except in very few cases. More specifically, at national level there is information on the <u>accessibility of beaches</u> and on the <u>accessibility of port facilities</u>. However, usually the information on accessibility issues is fragmentary and not up-to-date. For example, some Municipalities post on their website information related to issues and accessibility for persons with disabilities, such as the Municipality of Chania, whose <u>website</u> presents the parking spaces for vehicles for people with disabilities within the Municipality. Also, various cultural organizations post information on their website regarding the accessibility of the site to people with disabilities, such as the <u>archaeological museum of Thessaloniki</u>.