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# Greece

Elena Strati



# Introduction

This collection of country reports is part of the research on Digital Skills, Accommodation and Technological Assistance for Employment, conducted by the European Disability Forum (EDF) with the support of [Google.org](https://www.google.org).

The aim of the study is to explore the situation of persons with disabilities in the open labour market, focusing in particular on the potential of digital skills training and the use of accessible and assistive technologies to foster inclusion in the workplace.

National experts from each EU Member State (with the exception of Luxembourg) and the UK analysed their respective national contexts. They outline policies and programmes to support reasonable accommodation as a Human Resources (HR) procedure, map trends in the use of accessible and assistive technologies in the workplace, and explain the main limitations experienced by employees with disabilities in acquiring accessible or assistive technology that meets their needs. They also analysed the barriers faced by persons with disabilities related to digital skills and highlight some good practices at national level.

The national reports cover the following countries: the UK, Austria, Belgium, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Malta, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden. Luxembourg is the only EU Member State that is not part of the study due to not finding a suitable national expert on the topic.

# Glossary

**Assistive devices:** external devices that are designed, made, or adapted to assist a person to perform a particular task. Many people with disabilities depend on assistive devices to enable them to carry out daily activities and participate actively and productively in community or professional life.

**Assistive technology:** any item, piece of equipment, service or product system including software that is used to increase, maintain, substitute or improve functional capabilities of persons with disabilities or for, alleviation and compensation of impairments, activity limitations or participation restrictions.

**Disability allowance:** payments that persons with disabilities can receive from the State to cover basic living costs and services.

**Discrimination:** any distinction, exclusion or restriction on the basis of one or several grounds (sex, race, disability, sexual orientation, gender identity, etc.) that damages or nullifies the recognition, enjoyment or exercise of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field, on an equal basis with others.

**European Union (EU):** a unique economic and political union between 27 European countries, as it stands at the time of publication of this report.

**EU Statistics on Income and Living Conditions (EU-SILC):** a regular cross-sectional and longitudinal sample survey by Eurostat that provides data on income, poverty, social exclusion and living conditions in the European Union.

**General Comment:** a General Comment is a treaty body's interpretation of human rights treaty provisions, thematic issues or its methods of work. General Comments often seek to clarify the reporting duties of State Parties with respect to certain treaty provisions and suggest approaches to implementing those provisions.

**Member State(s) (of the EU):** the EU currently consists of 27 countries, also called "Member States". Each Member State is party to the founding treaties of the European Union and is therefore subject to the privileges and obligations of membership. Unlike members of most international organisations, the Member States of the EU are subject to binding laws in exchange for their representation within the common legislative and judicial institutions.

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**Number of observations (n):** indicates the number of employers each national expert managed to interview.

**Open labour market:** this refers to work in a mainstream or “regular” employment setting, as opposed to a setting that has been created specifically to employ a specific group of employees, such as persons with disabilities.

**Organisations of Persons with Disabilities (OPD):** represent the interests of their members with disabilities and have the mandate to advocate for the realisation of their human rights and lobby for the consideration of their interests.

**Percentage points:** this term expresses the arithmetic difference of two percentages, whereas percent (%) refers to the rate of change. For example, if Country A has an employment rate of 30% and Country B has an employment rate of 60%, Country B’s employment rate is 30 percentage points higher than Country A’s but is also higher by 100%.

**Persons with disabilities:** individuals who have long-term physical, mental, intellectual or sensory impairments which, in interaction with various barriers, may hinder their full and effective participation in society on an equal basis with others.

**Reasonable accommodation:** the necessary and appropriate modification and adjustments, where needed in a particular case, to ensure to persons with disabilities the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms. To be “reasonable”, the accommodation cannot impose a disproportionate or undue burden. Denial of reasonable accommodation is a form of discrimination.

**The Digital Economy and Society Index (DESI):** an index that the European Commission reports between 2014-2022, monitoring Europe’s overall digital performance and tracks the progress of EU countries in their digital competitiveness.

**United Nations Convention on the Rights of Persons with Disabilities (CRPD):** an international human rights treaty that reaffirms that all persons with disabilities must enjoy all human rights and fundamental freedoms. The CRPD clarifies that all persons with disabilities have the right to participate in the civil, political, economic, social and cultural life of the community in the same way as anyone else.

## National Overview

According to the latest EU-SILC data<sup>1</sup>, the employment of persons with disabilities in Greece is among the lowest in Europe (32.6%), noting a 27.7 percentage point gap in comparison with the employment rate of persons without disabilities in the country<sup>2</sup>. The situation has not improved despite the gradual improvement of the labour market overall following the economic recession and the COVID-19 pandemic<sup>3</sup>. National data shows that persons with disabilities are likely to be long-term unemployed, with an average of 5.5 years in unemployment<sup>4</sup>. Significant geographical disparities must also be noted: some of the lowest employment rates of persons with disabilities are recorded in the administrative regions of Central Greece (10%) and Western Greece (18.7%), whilst the highest employment rate is recorded in the urban centre of Attica (30.9%)<sup>5</sup>.

Both secondary data review and consultations with Disabled People's Organisations for the purposes of this report point to the following key obstacles in accessing employment and inclusive practices in the workplace: lack of engagement of the private sector with incentive-driven, disability-focused employment policies such as quota schemes and wage subsidies; limited investment and impact of active labour policies for persons with disabilities, including digital skills training and individualised job-seeking assistance; and weak legal frameworks and compliance in equal treatment and reasonable accommodation in employment.

It is finally important to consider that inclusive employment measures do not operate in a vacuum, and their scope and effectiveness, in the Greek context, are particularly linked with:

- accessibility of physical and digital environments overall, which remains problematic even in the region of Attica (hosting the capital city of Athens) where employment opportunities are generally more available<sup>6</sup>;
- unvaryingly increased risk of poverty for persons with disabilities (reaching 50.7% for those with severe disabilities aged 18-64), understanding that the risk of poverty and unemployment mutually reinforce each other in a vicious circle<sup>7</sup>;

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- limited disability mainstreaming in policies for growth: disability is typically addressed from a welfare policy perspective, effectively assessed as incapacity to work, while disability cash benefits are typically ceased once one is employed, with few exceptions.

All these affect the extent to which persons with disabilities can access digital skills training and certification necessary for employment, the availability and affordability of technologically sophisticated assistive technology, as well as the readiness of employers to provide relevant opportunities to candidates with disabilities as a matter of non-discrimination in the workplace.

## Digital Skills

Greece ranks 25th out of 27 EU Member States in the 2022 edition of the Digital Economy and Society Index (DESI), noting nevertheless progress in the digitalisation of public administration services since the COVID-19 pandemic<sup>8</sup>. 52% of the population have basic digital skills (EU average 54%), noting that young people (16-24) are better equipped (88% compared to the EU average of 71%). However, it is more likely for people in Greece to gain digital skills as part of their education, as “only 12% of enterprises provided ICT training to their employees in 2020, compared to the EU average of 20%”<sup>9</sup>. Evidence suggests that persons with disabilities are being left behind in trends of progress in digitalisation and digital transformation.

Just over half of people with moderate or severe disabilities in Greece have access to the internet, in contrast with the large majority of the non-disabled population (88.1%). Affordability is mentioned as a main reason in a minority of cases, indicating rather that a lack of skills and/or accessible solutions may be more important factors shaping internet access for persons with disabilities<sup>10</sup>.

Geographical disparities are noticeable (please see also the section from Interviews with OPDs), with less populated and economically developed regions lagging behind. The severity of disability further compounds the ability to acquire digital skills. Indicatively, in Thessaly, only 3 in 10 persons with disabilities are connected to the internet<sup>11</sup>.

Digital skills training opportunities throughout the life cycle have been typically funded through European Structural Funds and addressed to the general population. Although accessibility conditionality applies, there is no data to evidence the extent to which persons with disabilities have benefited. OPDs interviewed did not report any specific positive impact for this group. Similarly, while the National Academy of Digital Competences, currently hosting up to 300 courses, features an accessibility menu, it is not clear whether the courses hosted by third parties are accessible or monitored for their accessibility<sup>12</sup>.

More targeted actions are planned for the programmatic period 2021-2027. More specifically, the national digital strategy mentions the creation of 15 digital centres across the country to enhance the digital skills of the general population, including specialised training programmes for specific social groups such as persons with disabilities<sup>13</sup>.

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State-funded specialised vocational training programmes on ICT and related skills for people with disabilities, typically provided by the Public Employment Organisation or non-profit organisations/associations of parents of persons with disabilities, are available only in the two largest urban centres<sup>14</sup>. However, as pointed out in one interview with an OPD, those courses do not offer certification of digital skills.

Finally, nine out of 13 Regional Operational Programmes foresee investment in employment and vocational training of persons with disabilities. However, it is not clear yet whether these include or are linked with digital skills training, since such actions are anticipated to be funded by the Resilience and Recovery Fund<sup>15</sup>.

Information on good practices for digital skills training for persons with disabilities is lacking. Interviews with OPDs confirmed that the implementation of new programmes in this area has not yet started.

It is important to note that the Panhellenic Association for the Blind (PAB) has been consistently providing support to people with visual impairments to acquire basic digital skills, offering at the same time the necessary knowledge on using accessible software and assistive technology (e.g. speech-to-text and screen readers), based on their own funds for teaching staff and equipment. In the interviews, it was noted that outside the urban areas of Thessaloniki and Athens 'there is not much' for people with visual impairments or other types of impairment. It is also worth noting that the last EU co-funded programme targeting digital skills training for persons with disabilities was in 2008, whereby 90% of beneficiaries who participated in the programme run with the involvement of the PAB were certified by ECDL. This is indicative of the lack of investment but also of the importance of the involvement of OPDs in implementation for positive outcomes.

Only a few companies reported having specific policies in place for hiring and training persons with disabilities, and even fewer reported actively promoting the inclusion of persons with disabilities. These tended to be social economy initiatives, which are by default oriented towards the inclusion of (so-called) socially vulnerable groups. Indicatively, the percentage of employees with disabilities was reported as more than 30% in one case and 10-29% in another. Those who responded negatively to these questions also reported the least possible percentage of employees with disabilities, i.e. less than 1%, except

in one case of a large (200-999 employees) research institute, which reported having 2-4% employees with disabilities (despite not having specific HR policies in place).

It is interesting to note, however, that half of the respondents have considered hiring interns with disabilities, which is further seen as an enabling factor for recruitment. Lack of knowledge about or availability of funding schemes, as well as limited accessibility of wider physical environments, are the main obstacles to realising this potential, according to the companies participating in the study. Strong digital, communication, and analytical skills, English language proficiency, administration, and IT skills were reported as most relevant in addition to professional qualifications in some cases. Almost half of the participant companies provide on-the-job training on digital skills, which tends to be tailored to individual needs and requirements of the job.

As discussed above, OPDs interviewed pointed to the inadequacy of digital skills training schemes for persons with disabilities in the country so far, in terms of access to certification, geographical coverage, and lack of expertise on accessibility and assistive technology solutions in mainstream training providers. Given the intensification of digitalisation of state services, lack of digital skills results in exclusion from a wide range of public administration services, including those necessary to access employment, and equally being able to access online public services for businesses once employed.

Access to digital skills training forms part of the National Disability Action Plan<sup>16</sup>, and it is anticipated that nationwide programmes planned under the Operational Programme for Digital Transformation, Regional Operational Programmes, and the Resilience and Recovery Fund will be inclusive of disability, by virtue of the accessibility / disability non-discrimination conditionality of EU Structural Funds and mechanisms to ensure compliance. It was noted, however, that digital skills training programmes funded by the Recovery Fund are not covered by the same regulatory context, while the quality and inclusiveness of implementation by private, for-profit providers need to be assured by external mechanisms. Finally, it is important to assess how new digital skills training programmes will be linked to employment, as well as the extent to which the focus of the training will extend further than basic skills, to gaining skills necessary for the labour market today. Involving persons with disabilities in the design of digital skills training, collectively through their representative organisations or as user experts in accessibility, is an opportunity that must not be missed.

# Assistive Technologies

There is no dedicated research on the use of assistive technology in the workplace in Greece. It is worth quoting an excerpt from a relevant country report by the European Disability Expertise<sup>17</sup>:

“There are few national studies on new technologies and disability and where they do exist, they are quite outdated. More specifically, the last available studies were conducted in the ESF period 2007-2014 where Information Society formed a distinct strand of actions<sup>18</sup>. The conclusions of those studies pointed to challenges, rather than opportunities, related overall to very low demand and supply of accessible new technologies for people with disabilities (please see also section 5.2). Apart from efforts to put e-accessibility on the political agenda, i.e. National Digital Strategy, National Disability Action Plan, there are no standalone thematic reports and/or information campaigns by civil society, disabled people’s organisations or independent equality bodies on the topic of new technologies and/or digitalisation from a disability perspective. This arguably reflects the “low digital maturity of Greece and small contribution of the digital economy” overall (please see also section 5.2 below)”<sup>19</sup>.

There is no specific legal framework on accessible and assistive technologies in employment; rather, these may fall within the scope of reasonable accommodation (please see the relevant section below).

Only two companies positively responded that they are aware of employees with disabilities using assistive technology in the workplace, specifically accessibility features in personal computers. None of the participating companies have policies implementing support for, or are aware of public programmes supporting, the acquisition and use of assistive devices and technologies by employees with disabilities.

The interviews with OPDs showed that it is difficult to discuss assistive technology in employment separately from reasonable accommodation. Similarly, digital skills training presupposes the use of assistive technology.

At the same time, given that existing provisions in the country are limited to the realm of basic technical aids for daily life (negatively impacted by the economic crisis), a person with a disability is likely to use assistive technology regardless of employment status. OPDs confirmed that there is a lack of qualitative and quantitative data on this topic; nevertheless, experience shows that persons

with disabilities use individual resources to gain more specialised assistive technology. In one example offered, even in the public sector where persons with visual impairments tend to be recruited, especially in telephone centres, the equipment and software, such as speech-to-text, are outdated and the delays in procuring assistive technology are such that individuals resort to using their own assistive technology solutions.

# Reasonable Accommodation

National research and administrative data on the coverage of reasonable accommodation as an HR procedure are lacking. However, it is worth noting that the Greek Ombudsman has highlighted a lack of awareness and willingness to implement reasonable accommodation among private sector employers:

“In most of the cases investigated in 2019, the measures or reasonable adjustments which had to be considered by businesses to ensure appropriate working conditions for all staff were simple and almost self-evident. Nevertheless, several businesses were reluctant to adopt even such easy measures (...)”<sup>20</sup>.

According to national statistical data (2018), 85% of persons with disabilities in employment reported that their workplace had not provided or funded reasonable adjustments<sup>21</sup>. Further analysis of this data showed that only one in ten employees with disabilities in the region of Attika (where the highest disability employment rate is noted) fully enjoys reasonable accommodation in their workplace<sup>22</sup>.

Policy analysis of inclusive labour market policies is available from the European Disability Expertise (2022), where the following legal frameworks related to reasonable accommodation were identified<sup>23</sup>:

Law 4488/2017 (Article 61), the framework for implementing the United Nations Convention on the Rights of Persons with Disabilities (UN CRPD), states the obligation of employers to provide reasonable accommodation so long as employers are not disproportionately encumbered<sup>24</sup>.

Every employer must ensure the equal exercise of rights for persons with disabilities in the workplace, taking proactive measures as well as avoiding any action that may violate such rights. More specifically, they must remove existing barriers of any kind; comply with the principles of universal design in their field of activity to ensure accessibility of infrastructure, services and/or goods offered; provide, where needed on a case-by-case basis, reasonable accommodation without disproportionate or unjustified burden; abstain from practices, criteria, habits and behaviours that imply discrimination against persons with disabilities; and promote positive measures for the equal participation and exercise of rights of persons with disabilities in their area of work.

Law 4443/2016, integrating the EU Directives 2000/43 and 2000/78 (among others), forbids any direct and indirect discrimination in the field of employment on the grounds of disability, including the 'denial of reasonable accommodation' (Article 3), foreseeing the obligation to ensure reasonable accommodation so long as employers are not disproportionately encumbered (Article 5)<sup>25</sup>. The law applies to the public and private sectors and covers access to employment, i.e. recruitment and selection processes, access to vocational training, working conditions, and membership of trade unions or any other professional body<sup>26</sup>.

Quoting furthermore with regard to the single available scheme of support provision to employers in relation to reasonable accommodation<sup>27</sup>:

Businesses, trade associations, and municipal agencies of public or private law, exercising financial activities, which employ persons with disabilities through the Public Employment Service wage subsidy programme (please see section 2.2), are further entitled to financial support to make reasonable accommodation of the workplace for enabling access to employees with disabilities, including assistive technology, workspace adjustment, specialised software and so on. The programme covers 90% of related expenditure (up to €2,500)<sup>28</sup>. Following the latest call in September 2020, 12 out of 50 vacancies for reasonable accommodation have been covered<sup>29</sup>.

Only two respondents provide reasonable accommodation to their employees with disabilities, in line with their social entrepreneurship setup, and these are decided according to individual needs. One construction company (10-49 employees, with less than 1% employees with disabilities) mentioned that their HR policies foresee the accessibility of recruitment processes. Those who responded negatively tended to report that the main limitation is cost. One respondent specifically mentioned that restoring the physical accessibility of premises requires a significant amount of investment. Another respondent elaborated that cost may be linked to specialised technology, which may be high, especially for small companies, as well as to the time and further resources needed for a staff member to use the assistive technology effectively. The same respondent added that employers may also need to meet additional legal or regulatory requirements in providing reasonable accommodation. Although examples were not given, this may suggest the need for employers to consider wider accessibility-related legal and bureaucratic procedures and standards, which may be perceived as costly and time-consuming.

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The responses of the majority of companies regarding the main limitation for reasonable accommodation reflect to some extent the negative impact of inaccessible environments more widely, such as workplaces hosted in older buildings or inaccessible routes to the workplace, which indeed imply a high level of investment that is not channelled to employers. Equally, however, companies seem to lack awareness of the widely differentiated needs as well as the existing capacity of users of assistive technology, which are within an employer's obligation to support and can be accommodated at low cost.

Interestingly, one respondent mentioned that the biggest obstacle is that staff are predominantly non-disabled. One possible interpretation of this remark is that private companies remain unaware of possible provisions for reasonable accommodation if there is low demand, and this lack of awareness reinforces their hesitation to recruit a person with a disability as they continue to believe it will incur high costs.

The interviews with OPDs provide further insight into this vicious circle, and importantly, necessary action to break it. The OPDs interviewed acknowledged that while the form and shape of reasonable accommodation vary according to individual needs, for office-based positions these tend to be centred on the use of personal computers and the internet, including intranets and databases. Technological developments, such as screen readers and Microsoft-based accessible applications, mean that these kinds of solutions are both available and affordable. What is lacking is mainly the engagement of employers in providing these as part of reasonable accommodation, especially in the private sector, as well as vocational training and apprenticeship schemes for persons to gain the necessary skills and experience to enter employment.

Quota schemes in the public sector have effected some positive change in enabling access to employment, albeit not for persons with severe disabilities. Mandatory placement in the private sector has not worked, while there is limited engagement with wage subsidy programmes by the private sector, considering further that these are periodic and the single available scheme is linked with funding for reasonable accommodation. Awareness-raising programmes for employers on a regional level have identified that resistance to change in private businesses tends to be linked to a stereotypical view of persons with disabilities as clients rather than as potential employees. It is also worth noting that the Greek economy is comprised mostly of small (often family-based) to medium companies, arguably with the least capacity to form explicit policies

on diversity and inclusion. It can be similarly argued that in terms of state employment policies, persons with disabilities still tend to be largely perceived as beneficiaries of welfare provisions rather than potential labour force.

In the words of an interviewee, “we are in a very early stage. The UN CRPD has been ratified, there is a National Disability Action Plan, but we are in an early stage, they seem to be only on paper”. What is required is “a change of mindset and culture, including our own”, that is, active participation and initiative of persons with disabilities in shaping new realities and catching up with technology available to ensure accessibility across areas of life on an equal basis. The involvement of OPDs in policymaking, awareness-raising but also technological design, reaching and mobilising individuals with disabilities in doing so, is critical. Current efforts by the National Confederation of Persons with Disabilities (state social partner) are focused on training employability counsellors and HR focal points in companies on a rights-based approach to disability and making a business case for employing persons with disabilities to advance accessibility, especially in the tourist sector. They also lobby for making apprenticeship schemes available as part of vocational training schemes for persons with disabilities.

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