The right to political participation of persons with disabilities ahead of the 2024 European Parliament elections

Country: Greece

January 2024

Contractor: Centre for European Constitutional Law (in cooperation with Hellenic League for Human Rights and Antigone-Information and Documentation Centre on racism, ecology, peace and non-violence)

Author(s): Dr. Maria Mousmouti

|  |
| --- |
| DisclaimerThis document was commissioned under contract by the European Union Agency for Fundamental Rights (FRA) as background material for the project ‘Participating in the EU Framework required by Article 33 (2) of the UN Convention on the Rights of Persons with Disabilities’. The information and views contained in the document do not necessarily reflect the views or the official position of the FRA. The document is made publicly available for transparency and information purposes only and does not constitute legal advice or legal opinion. |

Contents

[1. Data on persons with disabilities exercising their right to political participation 3](#_Toc157590071)

[2. Political participation of persons with disabilities in practice 25](#_Toc157590072)

[2.1. Positive and negative key development as regards political participation of persons with disabilities 25](#_Toc157590073)

[2.2. Political participation: Promising practices 27](#_Toc157590074)

1. Data on persons with disabilities exercising their right to political participation

Table 1

| Indicator | Answer(Choose one of the answers provided below) | Source and brief description/assessment  |
| --- | --- | --- |
| Do national disability strategies include political participation? | National disability strategies specifically address political participation  | The National Action Plan on the rights of persons with disabilities that launched in 2020 includes a target dedicated to political participation of persons with disabilities. Target 26 deals with participation in political and public life, specifically: * Facilitating the exercise of electoral rights and access to voting through circulars on how the state can facilitate the exercise of the electoral right

This was partially implemented through article 36 of Law 5043/2023 concerning the operation of special reception and support areas for people with disabilities in every polling station that does not have voting rooms on the ground floor. In addition, the same article provides for the possibility of an escort in the polling station to support the voter with disability to exercise his/her electoral right.* Modernisation of the electoral process to ensure the participation of persons with disabilities through review of best practice, introduction of rules for the integrity and secrecy of vote and equal access to pre-electoral information

In all the websites of the Ministry of the Interior, including those through which electoral information is published, accessibility services for the disabled have been integrated, compatible with international W3C standards and in particular the Web Content Accessibility Guidelines (WCAG) 2.1 & 2.2 standard, with accessibility services for the blind people, people with mobility problems, people with dyslexia, cognitive and learning difficulties.* Review of the legislative framework on judicial guardianship through a working group and the review of good practices in other countries (timeline: 2021-2025).
 |
| Can persons deprived of legal capacity vote?  | Exclusion | Persons with disabilities under full guardianship are automatically deprived of their right to vote. This derives from the national constitution (art. 51 par. 3) and is reflected in the electoral law[[1]](#footnote-2). Persons under partial guardianship are not automatically deprived of their right to vote. This is determined in the judicial decision placing them under guardianship.  |
| Is there a requirement under law to register to vote? | No, automatic registration  | Inclusion in the general electoral lists/rolls is automatic when individuals reach voting age. However, voters that wish to vote at their place of current residence (PD. 26/2012), voters that wish to vote abroad (law 4648/2019) and voters that wish to vote via postal voting, (Law 5083/2024) are required to register in the special electoral lists/rolls through the online platforms provided by the Ministry of the Interior.   |
| Are alternative ways of voting available to persons with disabilities? | No alternative ways of voting avalilable by the end of 2023.As of 2024, Law 5083/2024 (OG A 12/26.01.2024) implemented alternative ways of voting aiming at further facilitating the participation of persons with disabilities in the electoral process (par .c, article 1) | No alternative ways of voting were available to persons with disabilities by the end of 2023.Postal voting was introduced by law 5083/2024 (OG A 12/26.01.2024)[[2]](#footnote-3) “Election of MEPs, facilitation of voters through postal voting, clearing of electoral rolls and other provisions of the Ministry of the Interior” as an alternative way of voting. According to the provisions of Article 6 of Law 5083/2024, all voters, whether they reside inside or outside of the country, can exercise their electoral right by postal voting in European Elections and National Referenda.This alternative way of voting benefits, among others, also persons with disabilities.  |
| Is there legislation regulating how people living in long-term institutions may vote? | No legislative provisions until 2023 New legislative provisions as of 2024 benefiting also people living in long-term institutions  | Until the end of 2023, existing provisions regulate voting for prisoners in specific polling stations (Articles 27, 82 par. 5, 7, 8 and 69 par. 2 of Presidential Decree 26/2012).As of 2024, Article 6 law 5083/2024 (OG A 12/26.01.2024) enables all voters, including people living in long-term institutions, to exercise their electoral right by postal voting in European Elections and National Referenda. |
| Is there a legal duty to provide assistance in voting to persons with disabilities? | Yes, for all persons with disabilities  | Α voter can request the assistance of the court representative, who is responsible for the electoral process at the polling station where a person is registered to vote. If that happens, court representatives are obliged to provide the necessary assistance[[3]](#footnote-4). This concerns persons with disabilities (with the right to vote) and individuals with mobility challenges. According to article 36 of Law 5043/2023 (OG A91/13.04.2023) an escort can accompany a voter with disability in the polling station to support them when exercising their electoral right, with the permission of the representative of the court. Assistance is provided in the presence of the court representative. |
| Are all persons with disabilities legally able to access complaints mechanisms if they have not been able to exercise the right to political participation? | No, only persons with legal capacity  | Persons with disabilities under restrictive guardianship cannot vote. Persons under partial guardianship, if allowed to vote, can access complaint mechanisms. The National Transparency Authority has set up a general complaint mechanism (not specific to elections)[[4]](#footnote-5).  |
| Is information on complaints mechanisms regarding political participation accessible to persons with disabilities? | No data | The complaint forms meet accessibility criteria, in accordance with the following website accessibility tools: * <https://wave.webaim.org/>
* <https://accessmonitor.acessibilidade.gov.pt/>
* <https://achecks.org/checker/index.php>
* <https://ace.useit.se/ax/aceit.php>

[Level Triple-A conformance, W3C WAI Web Content Accessibility Guidelines 2.0](https://www.w3.org/WAI/WCAG2AAA-Conformance)WCAG 2.0 (Level AAA) |
| Have national courts considered cases related to the right to political participation of persons with disabilities? | No, no cases identified  | No court cases related to the right to political participation of persons with disabilities have been identified.  |
| Have non-judicial complaints mechanisms considered cases related to the right to political participation of persons with disabilities? | No, no cases identified  | No cases to non-judicial complaints mechanisms have been identified.  |
| Are persons with disabilities members of the current national parliament? | No data identified  | No information is available on persons with disabilities who are members of the current national parliament.  |
| Is data available on the number of members of municipal/regional governments who have a disability? | No data available  |  Currently, no data is officially available on the number of members of municipal/regional governments who have a disability |
| Is training for election authorities and officials on non-discrimination on the grounds of disability, accessibility and accommodation required by law? | Training not required by law, but some relevant training or guidance available | Training for election authorities is not required by law. However, some training is offered by Bar Associations across the country. A practical guide for judicial representatives is also made available. The guide of the Athens Bar Association made available for the latest national elections[[5]](#footnote-6) provides instructions on ways to facilitate voters who cannot exercise their voting rights on their own due to physical weakness, old age, sickness, disability, analphabetism etc. |
| Are there mechanisms in place to ensure consultation and involvement of DPOs in the development of laws and policies which affect them? | No mechanisms established by law, but systematic procedures in place  | Consultation is a formal part of the lawmaking process. Pre-legislative consultation is open to all and is conducted through the platform opengov.gr. Also, according to the article 4.3 of the Law 4074/2012, through which the UN Convention on the Rights of Persons with Disabilities was ratified by the Greek state, persons with disabilities should be involved “[i]n the development and implementation of legislation and policies […], and in other decision-making processes concerning issues relating to [them].t. In practice, the National Confederation of Disabled People (NCDP) and other disability organisations actively participate in consultations providing insights from a disability perspective. They have pointed out that barriers are still in place, especially relating to web accessibility. Namely, the National Confederation of Disabled People (NCDP), after running an accessibility audit check at the platform [opengov.gr](http://opengov.gr), through the tool Lighthouse, found out that the overall web accessibility score was 47%.The National Accessibility Authority also has the mandate to participate in the legislative process. It can adopt and address opinions on draft laws to the initiating institutions.Both the National Confederation of Disabled Persons and the National Accessibility Authority officially participate in the Technical Committee on the planning of the National Strategy for the rights of persons with disability for the period 2024-2030.  |
| Do national authorities provide guidelines on how to make polling stations accessible? | No specific guidelines on how to make polling stations accessibleGeneral electoral guidance (and legislation adopted in 2024) address some issues of accessibility of polling stations.  | The Ministry of the Interior assigns each time the polling stations that will be used for the election. These are mainly schools or municipal buildings. The Directorate of Elections of the Ministry of the Interior requested the National Accessibility Authority for assistance in the process of adjusting the legislative framework on the equal participation of persons with disabilities in political life and electoral process. Via a letter (5/10/2022) they asked for the development of accessibility guidelines for polling stations and broader issues of accessibility of the electoral process. The National Accessibility Authority formed a working group that concluded that existing legislation is sufficient to ensure the accessibility of polling stations, as it mandates accessibility in all public buildings and buildings open to the public.. The National Accessibility Authority proposed legislative action to the Ministry of the Interior by means of a set of criteria for polling stations including a) criteria for prioritization when choosing installations for polling stations, b) broadening the types of buildings that can be selected to make use of additional available accessible spaces like sports infrastructures, c) opportunity for the persons with disabilities to select who will accompany them when assistance is required for voting, d) improvement of the accessibility of the webpage on the electoral process.Article 36 of the Law 5043/2023 (OG A91/13.04.2023) provides for a place of reception and support of voters with disabilities and reduced mobility during general elections.  |
| Does the website which provides instructions for voting and information on candidates meet accessibility standards? | Partially, some accessibility measures are in place  | Information for voters is available at the webpage <https://mpp.ypes.gov.gr/#/>. The webpage includes an accessibility declaration. The National Confederation of Disabled People notes that while the webpage includes an [accessibility declaration](https://www.ypes.gr/wp-content/uploads/2021/10/%CE%94%CE%AE%CE%BB%CF%89%CF%83%CE%B7-%CE%A0%CF%81%CE%BF%CF%83%CE%B2%CE%B1%CF%83%CE%B9%CE%BC%CF%8C%CF%84%CE%B7%CF%84%CE%B1%CF%82.pdf), this does not ensure full accessibility to persons with disabilities. The accessibility declaration was uploaded in August 25, 2021, but it has not been updated on, at least, an annual base, as foreseen by article 42 of the law 4727/2020. Moreover, the National Confederation of Disabled People points out that according to the Lighthouse tool,[[6]](#footnote-7) the overall accessibility score that the webpage <https://mpp.ypes.gov.gr/#/> receives is 78%, meaning that it fails to fully meet the web accessibility standards.An upgrading of the webpage was completed before the general elections taking place on May 21, 2023.The President of the Accessibility Authority presented a report with the results of an accessibility evaluation of public websites, conducted by the Human-Computer Interaction Laboratory of the Institute of Computer Science – FORTH. The report is used as a basis/guideline for improving the accessibility of public websites in Greece.  |
| Are some television programmes providing instructions for voting and information on candidates subtitled? | As of 2024, some key programs are subtitled  | Article 32 of Law 5083/2024 provides for the following:1. Messages of parties and coalitions of cooperating parties, as well as political events, press conferences and other related events broadcast on the basis of the article 45 of presidential decree 26/2012(Α΄ 57), are accompanied by sign language interpretation on one sixth (1/6) of the screen subtitling. Especially the messages of the first paragraph must be accompanied by sign language interpretation on one sixth (1/6) of the screen and subtitling. In case of violation of the pre-mentioned, the messages and events are not transmitted.
* Interviews of leaders of political parties, transmitted by public television, as well as by private television stations of pan-Hellenic/nationwide reach, are simultaneously broadcast in sign language on one sixth (1/6) of the screen. In case of failure to comply with the above obligation, the National Council for Radio and Television may impose a fine of up to twenty thousand (20,000) euros on the television station.
 |
| Do some television programmes providing instructions for voting and information on candidates have national sign language interpretation? | Yes, some key programmes have sign language interpretation | Yes, public broadcasters and some private channels have sign language interpretation. By means of Law 5083/2024 national sign language interpretation has become a prerequisite for television programmes.  |
| Are some television programmes providing instructions for voting and information on candidates audio described? | No information until 2023 Yes, for some key programmes as of 2024 | For 2023, no information available.Since 2024, article 32 of Law 5083/2024 introduces specific requirements in relation to audio descriptions.  |
| Were some political party manifestos provided in accessible formats during the most recent elections? | No information  | There is no information on whether political party manifestos were provided in accessible formats during the most recent elections. However, an assessment of the webpages of the six biggest parties in 2021 showed that webpages of political parties do not comply with accessibility standards and that no notable change can be noted in relation to 2020. No data is available on 2022 and 2023[[7]](#footnote-8).  |
| Are there legal accessibility standards for public and private providers of internet and web-based public information? | Yes, covering public only  | Law 4727/2020 on ‘Digital Governance (transposition of Directive (EU) 2016/2102 and Directive (EU) 2019/1024) Electronic Communications (transposition of Directive (EU) 2018/1972) and other provisions concerns the accessibility of websites and mobile applications of public sector organisations.According to article 42 of Law 4727/2020 public sector organisations are obliged to upload accessible information in relation to the level of accessibility and to update it regularly and at least on an annual basis. A Guide on Digital Accessibility (Οδηγός Ψηφιακής Προσβασιμότητας)[[8]](#footnote-9) is intended to be a complete and concise manual explaining the basic concepts of digital accessibility analyzing its principles and providing recommendations to achieve the optimal degree of accessibility for public websites and mobile applications. The Guide was developed by the Ministry of Digital Governance with the collaboration of the National Accessibility Authority and in consultation with the National Confederation of Disabled People.  |
| Are there legal accessibility standards for public and private providers of media? | Yes, covering public only  | Article 67 of Law 4488/2017 media and communication service providers, including internet providers, as expected to use technologies, such as talking websites, captioning, audio description and sign interpretation to ensure access of persons with disabilities to their content.Article 3 of Ministerial Decision 3586/2018 (OG Β’ 5491/06.12.2018) introduces minimum standards for the provision of media service providers (public, private and pay tv), concerning the total broadcasted time they are obliged to provide in sign language interpretation. Article 4 of the Decision concerns public announcements, such as speeches of the President of the Republic and the Prime Minister, as well as emergency announcements, including cases of natural disasters defining that they have to be transmitted to the public via audiovisual services in Greek sign language with simultaneous recording of subtitles. Standards of accessibility for media providers are included in Law 4779/20.02.2021 (OG A’ 27) that transposes Directive 2010/13 on the provision of audiovisual media services as amended by Directive 2018/1808. They concern public providers. Article 10(4) of Law 4779/2021 entrusted the National Council for Radio and Television with the responsibility to a) inform persons with disabilities on the television programmes accessible to them and the programmes of on-demand services and b) provide them with the possibility to submit a relevant complaint.In this context, the NCRTV held a series of meetings with media service providers to whom it has proposed, and the providers have accepted, although there is no legal obligation, to use the accessibility marking proposed by the NCRTV, which they have already started to use both in the lists of programmes they post on their websites and in the online guide, in the information relating to each programme. They have also accepted to provide relevant information before the start of the programme[[9]](#footnote-10).The proposed signage is as follows:- ΝΓ = Sign Language- ΑΠ = Audio description- ΑΥ = Audio Subtitles- ΜΤ = Dubbing - CC = Closed CaptionsA form is also provided whereby stakeholders can submit complaints to the NCRTV about accessibility issues. However, there are no available data on the complaints that have been submitted so far and the reason of the complaints.None of the programmes are specific to elections. According to article 32 of Law 5083/2024, the messages of political parties, political events, press conferences, other related events and interviews of political party leaders are broadcasted with sign language interpretation or subtitling.  |
| Are there mandatory accessibility standards for national and local authority buildings in the election context? | No/No information  | No specific accessibility standards are in place for national and local authority buildings in the election context beyond those provided for in general legislation.  |
| Are there legal accessibility standards for polling stations in place? | Yes, for all polling stations  | No specific accessibility standards are in place for polling stations besides those provided for in general legislation. Article 36 of Law No. 5043/2023 (Government Gazette 91 A') provided for the creation of a reception and support area for voters with disabilities and reduced mobility for polling stations that are not located on a ground floor and do not meet accessibility criteria for persons with disabilities. This provision was implemented in the country's national elections in May and June as well as in the elections for the authorities of local and regional authorities in October 2023.Article 36 provides that in every polling station in the Greek territory, which is not located on the ground floor and does not meet accessibility criteria there is a reception and support area for voters with disabilities and reduced mobility. The reception and support area for voters with disabilities and reduced mobility is located on the ground floor of the polling station, is accessible to persons with mobility problems, has a special ramp if necessary, meets the applicable fire safety standards, has a posted distinct and clearly legible title for easy identification by voters and their accompanying persons, and is equipped with a voting divider (screen).Municipalities are responsible for the creation of the aforementioned area and to select the area with the most suitable technical characteristics.An official of the municipality will be present at the venue and responsible for its proper functioning. Upon the arrival of the voter at the reception and support area, the competent official shall immediately inform means the court representative and provide him/her with the voter's identification data. The court representative, after verifying the voter's registration on the electoral roll, shall go to the place of reception and assistance for voters with disabilities and reduced mobility, carrying with him/her a complete set of ballot papers, a blank ballot paper and an envelope with a stamp and initials for the insertion of the ballot paper.The court representative shall verify the voter's identification information with the corresponding information on the voter list and assure himself/herself as to the voter's identity. In addition to the voter, the following shall have exclusive access, if necessary, to the area within the ballot box for the selection of the ballot paper: e) the court representative and f) any accompanying person of the voter, under the responsibility and in the presence of the court representative. The court representative shall assist in expressing the voter's wishes with the discretion and confidentiality required to maintain the secrecy of the vote.Assistance dogs (guide dogs) of persons with disabilities and reduced mobility shall be allowed in the polling place and in the area for receiving and assisting voters with disabilities and reduced mobility.After the voter exits the voting polling place, the court representative is responsible to take the envelope containing the ballot to the respective polling place where the voter is registered to vote and drop it in the ballot box. The court representative shall carry out the procedure of informing the electoral roll and the competent electoral commission. At all stages of the above-mentioned procedure, subject to the second subparagraph of paragraph e', the court representative shall be accompanied by members of the electoral commission and by electoral representatives. |
| Is data available on the proportion of polling stations that are accessible to persons with disabilities? | No data identified | No data is available on the overall proportion of polling stations which are accessible to persons with disabilities.The majority of polling stations are school buildings. Before each election, by decision of the Ministry of interior the schools or other public buildings that will serve as polling stations are identified[[10]](#footnote-11). The list does not include any indication of whether or which are accessible. In any event, voters are assigned to specific polling stations. There is no possibility to change polling station on the basis of the lack of accessibility. Article 31 of law 5083/2024 creates a registry of polling stations that is run by the Ministry of the Interior. The purpose of the registry is to record all possible premises accessible for people with disabilities that can be used as polling stations. The responsibility for the submission of such data belongs to the Municipalities. |
| Is data available on the proportion of public buildings that are accessible for persons with disabilities? | No data identified  | There is no official data on the proportion of public buildings that are accessible for persons with disabilities. In the context of the implementation of the Action Plan on the Rights of Persons with Disabilities a platform[[11]](#footnote-12) was put in place to record the accessibility of buildings of public interest. This was initiated in September 2021 and was still ongoing in February 2024. The results of the recording have not been publicly announced yet. By means of the recently passed law 5083/2024, according to article 31 in particular, a register of polling stations is created by the Ministry of the Interior. The purpose of the register is to record all the possible premises accessible for people with disabilities that can be used as polling stations. The responsibility for the submission of such data belongs to the Municipalities. |

1. Political participation of persons with disabilities in practice
	1. Positive and negative key development as regards political participation of persons with disabilities

The political participation of persons with disabilities is in the political agenda and is identified as a separate target in the national action plan on the rights of persons with disabilities. Positive developments are noted as well as incremental improvements in addressing accessibility barriers or accommodations to facilitate participation in the electoral process. However, major legal barriers in the political participation of persons with disabilities remain as yet unaddressed. Key issues include the link between legal capacity and the right to vote and stand as a candidate, the availability of information and materials on the electoral process and, finally, access to the process itself and the availability of options for persons with disabilities.

Law 5043/2023 (OG 91 A/13.04.2023) regulated issues of accessibility to polling stations for persons with disabilities, while recently, law 5083/2024 (OG 12 A/26.01.2024) tackled with some of these issues, such as the provision for postal voting, as well as for accessibility standards for public and private media providers during the pre-election period.

Type your text here.

* 1. Political participation: Promising practices

Promising practice 1

Political participation of persons with disabilities has been included in the National Action Plan on the Rights of persons with Disabilities. Target 26 deals with participation in political and public life and specifically:

* Facilitating the exercise of electoral rights and access to voting through circulars on how the state can facilitate the exercise of the electoral right

The facility was partially implemented by the provision of the article 36 of Law 5043/2023 concerning the operation of special reception and support areas for people with disabilities in every polling station that does not have voting rooms on the ground floor. In addition, the same article of the above-mentioned law provides for the possibility of an escort in the polling station to support the voter with disability to exercise his/her electoral right. Following the adoption of these provisions, the Ministry of the Interior issued the ref. no. 38570/03.05.2023 circular on the facilitation of the exercise of the voting right for persons with disability, regarding the general elections taking place on May 21, 2023.

* Modernisation of the electoral process to ensure the participation of persons with disabilities through review of best practices, introduction of rules for the integrity and secrecy of vote and equal access to pre-electoral information (

It is worth mentioning that in all the websites of the Ministry of the Interior, including those through which electoral information is published, accessibility services for the disabled have been integrated, compatible with international W3C standards and in particular the Web Content Accessibility Guidelines (WCAG) 2.1 & 2.2 standard, with accessibility services for the blind people, for people with mobility problems as well as for people with dyslexia, cognitive and learning difficulties.

* Review of the legislative framework on judicial guardianship through a working group and the review of good practices in other countries (timeline: 2021-2025).
* Addressing the lack of accessibility of polling stations by means of legal obligations for a reception and support area for voters with disabilities and reduced mobility in non-accessible polling stations.

Initiatives adopted in 2024 include:

* Implementing postal voting for the European Elections and National Referendums
* ~~the obligatory~~ Rendering transmission of political messages in sign language obligatory.

Creation of a register of accessible premises used as polling stations

* Facilitation of Court-Representatives with Disabilities

**Promising practice 2: Reception and support areas in non-accessible polling stations**

Article 36 of Law No. 5043/2023 (OG 91 A') provided for the creation of a reception and support area for voters with disabilities and reduced mobility for polling stations that are not located on a ground floor and do not meet accessibility criteria for persons with disabilities.

The reception and support area for voters with disabilities and reduced mobility is located on the ground floor of the polling station, is accessible to persons with mobility problems, has a special ramp if necessary, meets the applicable fire safety standards, has a posted distinct and clearly legible title for easy identification by voters and their accompanying persons, and is equipped with a voting divider (screen).

Municipalities are responsible both for the creation of the aforementioned area and the selection of the area with the most suitable technical characteristics.

An official of the municipality will be present at the venue and responsible for its proper functioning.

Upon the arrival of the voter at the reception and support area, the competent official shall immediately inform means the court representative and provide him/her with the voter's identification data. The court representative, after verifying the voter's registration on the electoral roll, shall go to the place of reception and assistance for voters with disabilities and reduced mobility, carrying with him/her a complete set of ballot papers, a blank ballot paper and an envelope with a stamp and initials for the insertion of the ballot paper.

The court representative shall verify the voter's identification information with the corresponding information on the voter list and assure himself/herself as to the voter's identity. In addition to the voter, the following shall have exclusive access, if necessary, to the area within the ballot box for the selection of the ballot paper: the court representative and any accompanying person of the voter, under the responsibility and in the presence of the court representative. The court representative shall assist in expressing the voter's wishes with the discretion and confidentiality required to maintain the secrecy of the vote.

Assistance dogs (guide dogs) of persons with disabilities and reduced mobility shall be allowed in the polling place and in the area for receiving and assisting voters with disabilities and reduced mobility.

After the voter exits the voting polling place, the court representative is responsible to take the envelope containing the ballot to the respective polling place where the voter is registered to vote and drop it in the ballot box. The court representative shall carry out the procedure of informing the electoral roll and the competent electoral commission. At all stages of the above-mentioned procedure, , the court representative shall be accompanied by members of the electoral commission and by electoral representatives.

**Promising practice - 3: Accessible media and complaints mechanisms**

In Ministerial Decision No 3586/2018 (OG B 5491/06.12.2018), by means of the article 3, the minimum standards for the provision of media service providers (public, private and pay tv) are defined, concerning the total broadcasted time they are obliged to provide in sign language interpretation.

Furthermore, in the prementioned Ministerial Decision No 3586/2018 there is a provision in article 4 concerning public announcements, such as speeches of the President of the Republic and the Prime Minister, as well as emergency announcements, including cases of natural disasters defining that they have to be transmitted to the public via audiovisual services in Greek sign language with simultaneous recording of subtitles.

Article 10(4) of Law 4779/2021 entrusted the National Council for Radio and Television (the independent authority supervising radio and television) with the responsibility to a) inform persons with disabilities on the television programmes accessible to them and the programmes of on-demand services and b) provide them with the possibility to submit a relevant complaint.

In this context, the NCRTV held a series of meetings with media service providers to whom it has proposed, and the providers have accepted, although there is no legal obligation, to use the accessibility marking proposed by the NCRTV, which they have already started to use both in the lists of programmes they post on their websites and in the online guide, in the information relating to each programme. They have also accepted to provide relevant information before the start of the programme[[12]](#footnote-13).

The proposed signage is as follows:

- ΝΓ = Sign Language

- ΑΠ = Audio description

- ΑΥ = Audio Subtitles

- ΜΤ = Dubbing

- CC = Closed Captions

A form is also provided whereby stakeholders can submit complaints to the NCRTV about accessibility issues. However, there are no available data on the complaints that have been submitted so far and the purpose of the complaints.

Last but not least, concerning the political participation of the persons with disabilities, it is worth mentioning the newly passed law 5083/2024 (OG 12 A/26.01.2024), in particular article 32 provides for the following:

1. Messages of parties and coalitions of cooperating parties, as well as political events, press conferences and other related events broadcast on the basis of the article 45 of presidential decree 26/2012(Α΄ 57), are accompanied by sign language interpretation on one sixth (1/6) of the screen subtitling. Especially the messages of the first paragraph must be accompanied by sign language interpretation on one sixth (1/6) of the screen and subtitling. In case of violation of the pre-mentioned, the messages and events are not transmitted.
2. Interviews of leaders of political parties, transmitted by public television, as well as by private television stations of pan-Hellenic/nationwide reach, are simultaneously broadcast in sign language on one sixth (1/6) of the screen. In case of failure to comply with the above obligation, the National Council for Radio and Television may impose a fine of up to twenty thousand (20,000) euros on the television station.

**Promising practices beyond the scope of the information request**

**Promising practice 1: Registry of accessible premises that can be used as polling stations**

Article 31 Law 5083/2024 ( OG A 12) creates a registry of accessible premises for people with disabilities that can be used as polling stations. Recording of all possible places and the responsibility for the submission of such data belongs to the municipalities. The register will be controlled by the Ministry of the Interior. Access to the register will be given to authorized officials of the municipalities and regions of the country.

**Promising practice 2: Postal voting**

Law 5083/2024(OG 12 A') provides all voters, including people with disabilities, the alternative method of postal voting. The voters whether they live inside or outside the

Country can exercise their electoral right by postal voting. if they register to do so. The alternative of postal voting only applies to the elections of the European Parliament and National Referendums.

**Promising practice 3: Accessibility standards for public and private providers of media during the pre-election period**

Article 32 Law 5083/2024 sets standards for the broadcasting of political parties' preelection messages.

More specifically, the messages of the political parties as well as political events, press conferences and other related events are broadcast with sign language interpretation or subtitling. In case of violation, the messages and events will not be transmitted.

Also, interviews of political party leaders from public television stations and nationwide private television stations are simultaneously broadcast in sign language. In case of failure to comply with the above obligation, the NCRTV may impose a fine of up to twenty thousand (20,000) euros on the television station.

**Promising practice 4: Facilitation of Court-Representatives with Disabilities**

Law 5083/2024 provides for the assignment of two persons for secretary support to court representatives or president of electoral committee, in case they are persons with disabilities.

**Promising Practices 5: Facilitating People with Disabilities to participate actively in decision making processes**

The possibility to hold meetings of collective management bodies of municipal and regional authorities in person or via videoconference or simultaneously in person and via teleconference facilitates the participation of representatives with disabilities and mobility challenges[[13]](#footnote-14).

1. Article 51 par. 3 of the Hellenic Constitution reads: ‘The Members of Parliament shall be elected through direct, universal and secret ballot by the citizens who have the right to vote, as specified by law. The law cannot abridge the right to vote except in cases where a minimum age has not been attained or in cases of legal incapacity or as a result of irrevocable criminal conviction for certain felonies ’. [↑](#footnote-ref-2)
2. https://www.et.gr/api/DownloadFeksApi/?fek\_pdf=20240100012 [↑](#footnote-ref-3)
3. Greece, Ministry of Interior, Circular on instructions for the elections of 25th June 2023, accessible at: <https://www.ypes.gr/wp-content/uploads/2023/06/eggr52294-14062023.pdf> [↑](#footnote-ref-4)
4. <https://www.aead.gr/complaints>) [↑](#footnote-ref-5)
5. [Πρακτικός Οδηγός Δικαστικού Αντιπροσώπου Βουλευτικές Εκλογές 21ης Μαΐου 2023](https://www.dsa.gr/sites/default/files/news/attached/1_praktikos_odigos_dikastikoy_antiprosopoy_-_ekloges_21is_maioy_2023.pdf). [↑](#footnote-ref-6)
6. Lighthouse is an open-source, automated tool for improving the quality of web pages. You can run it against any web page, public or requiring authentication. It has audits for performance, accessibility, progressive web apps, SEO, and more. For more info check: <https://chromewebstore.google.com/detail/lighthouse/blipmdconlkpinefehnmjammfjpmpbjk> [↑](#footnote-ref-7)
7. [National Disabilities Report 2021](https://www.paratiritirioanapirias.gr/el/results/publications/72/e8nikh-ek8esh-gia-th-anaphria-etoys-2021%20p.%20147-149). [↑](#footnote-ref-8)
8. [Οδηγός Ψηφιακής Προσβασιμότητας](https://www.secdigital.gov.gr/wp-content/uploads/2023/05/Accessibility_Guide.pdf). [↑](#footnote-ref-9)
9. The list of accessible programmes is available here: <https://www.esr.gr/%CE%B1%CE%BC%CE%B5%CE%B1/>. [↑](#footnote-ref-10)
10. For more information, see the webpage, <https://www.ypes.gr/eklogika-tmimata/>. [↑](#footnote-ref-11)
11. [Ηλεκτρονική πλατφόρμα καταγραφής κτηρίων](https://web.tee.gr/prosvasimotita/katagrafi/).The platform is run by the Technical Chamber of Greece. [↑](#footnote-ref-12)
12. The list of accessible programmes is available here: [https://www.esr.gr/%CE%B1%C E%BC%CE%B5%CE%B1/](https://www.esr.gr/%CE%B1%25C%20E%EF%BF%BD%CE%B5%CE%B1/). [↑](#footnote-ref-13)
13. Articles 67, par. 1 and 75, par. 7 of Law 3852/2010 (OG 87A/07.06.2010), as amended and in force by law 5056/2023 (OG A’ 163/06.10.2023) and law 5083/2024 (OG a’ 12/26.01.2024), articles 167, par. 1 and 177, par. 11 and 164, par. 4 of Law 3852/2010, as amended and in force by provisions of law 5056/2023. [↑](#footnote-ref-14)