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| LOGO_1.jpg | Greek National Commission for Human Rights |

## CRPD Draft General Comment on art. 27

**Submission to the CRPD Committee**

The Greek National Commission for Human Rights (hereinafter GNCHR) as the State's independent advisory body for the protection of human rights and the National Human Rights Institution has been established by Law 2667/1998. In 2021, by virtue of Law 4780/2021, the GNCHR was explicitly recognized as the National Human Rights Institution in Greece and acquired legal personality, functional independence, administrative and financial autonomy. Since 2001, the GNCHR is being accredited A status (full compliance) with UN Paris Principle, indicative of its independence and effective fulfillment of its role. In March 2017, the GNCHR was re-accredited with an “A status” by the competent GANHRI Sub-Committee on Accreditation (SCA), which operates under the auspices and in collaboration with the Office of the High Commissioner for Human Rights (OHCHR).

The GNCHR has a very broad mandate covering the whole range of human rights, as they are enshrined in the Constitution, in international and European treaties and Directives, as well as in soft law instruments. The GNCHR ensures pluralism through its large and diverse composition of 42 members nominated by institutions whose activities cover the field of human rights: NGOs, trade unions, independent authorities, universities, bar associations, political parties, Parliament and the Administration. Among its members there are representatives of Roma, Refugees, women, LGBTQI+ people, the Greek Council for Refugees, persons with disabilities etc.[[1]](#footnote-1) It has to be noted, that among GNCHR’s members, a representative of the National Confederation of Disabled People (NCDP) is appointed, who participates with a voting right in the GNCHR Plenary. The NCDP is an umbrella organization representing the disability movement of Greece. It is a non-profit legal entity founded and established in 1989 by organizations of people with disabilities and their families.

The GNCHR as the advisory body to the State on matters pertaining to the promotion and protection of human rights has dealt systematically with the protection against discrimination on the grounds of disability. In the framework of its mandate, the GNCHR has issued up to date a series of relevant Statements and Recommendations to the State and submitted written contributions with regard to the compliance of national legislation with the international obligations of Greece in relation to the rights of persons with disabilities.[[2]](#footnote-2) With regard to the emergency measures taken to address the current pandemic, the GNCHR has urged for stronger State’s commitment to fully realizing the rights of persons with disabilities and equal treatment in practice.[[3]](#footnote-3) To this end collaboration among the NHRIs could build a unified response to the challenges of the pandemic and safeguard a very advanced and effective human rights protection system.

First of all, the GNCHR expresses its strong agreement with the contents of the General Comment on article 27 on the right of persons with disabilities to work and employment. With regard to targeted measures that implement the right of persons with disabilities to work on an equal basis with others, the GNCHR would like to focus on the following issues:

* It is of particular importance for the State Parties to achieve better results regarding the transition of persons with disabilities from sheltered workshops to the open labour market. The guarantee of a coherent legal scheme for supported employment could facilitate the transition.
* Protective employment and social entrepreneurship for the support of persons with disabilities that integrate them in a social, economic, and occupational context should be a priority for the State Parties. The introduction of new forms of social cooperative enterprise, which guarantee the right to work for persons with disabilities, is in this respect crucial.
* The establishment of national systems of collective bargaining and collective agreements through legislative acts, as key institutional instruments that guarantee the general interest and the interest of workers (mainly through the establishment of general minimum standards of wages and working conditions for all workers) is also critical. The setting of universally binding minimum standards of work could have, in this regard, a significant impact especially on persons with disabilities.
* State parties should be obliged to intensify their measures in order to improve reasonable accommodations for employees and workers with disabilities in private and public sector, as well as, in alternative schemes of employment. Quotas in the private sector are necessary for increasing the employment of people with disabilities.
* Furthermore, State parties should ensure the effective representation of the disability movement in labor force employment agencies.
* Attention should be paid to the operation of accessible websites, as well as, of digital services for the support of the employment of persons with disabilities.
* Special emphasis should be finally put on the proper institutional and practical implementation of the framework for preventing and combating violence and harassment in work in line with the ILO Convention No. 190 on Violence and harassment in the world of work.[[4]](#footnote-4) In this regard and with the aim of the reconciliation of family and professional life, flexible and well-functioning systems of support employment and relevant programs engaging women with disabilities should be developed and implemented.

1. For the full list of GNCHR’s Members, please visit the site of the GNCHR [www.nchr.gr](http://www.nchr.gr) [↑](#footnote-ref-1)
2. Please visit GNCHR website: [EMPLOYMENT](https://www.nchr.gr/en/decisions-positions/81-employment.html) [↑](#footnote-ref-2)
3. GNCHR [Extraordinary times call for extraordinary responses: Summary of Recommendations to the State regarding the impact of the pandemic and the measures taken to address it on human rights](https://www.nchr.gr/images/English_Site/COVID19/English_Summary_of_Recommendations.pdf)

   GNCHR [Report on the need for protection of human rights with regard to the measures taken in response to the Coronavirus (COVID - 19) pandemic and recommendations to the State](https://www.nchr.gr/en/news/1136-report-on-the-need-for-protection-of-human-rights-with-regard-to-the-measures-taken-in-response-to-the-coronavirus-covid-19-pandemic-and-recommendations-to-the-state.html) [↑](#footnote-ref-3)
4. [Summary of GNCHR Observations](https://www.nchr.gr/images/English_Site/ERGASIA/Summary_of_GNCHRs_Observations_on_Draft_Labor_Law_final.pdf) on Draft Law of Ministry of Labour and Social Affairs "On the Protection of Employment Establishment of the Independent Authority Labor Inspectorate Ratification of the ILO Convention No. 190 on violence and harassment in the world of work  Ratification of the ILO Convention No. 187 on the Promotional Framework for Occupational Safety and Health at Work Incorporation of Directive (EU) 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance for parents and carers", 10.6.2021. [↑](#footnote-ref-4)