



Digitalisation and digital transformation in Greece

Implications for persons with disabilities

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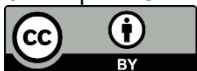
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1 Executive summary

The Ministry of Digital Governance (2020) reset the agenda for digitalisation and digital transformation of public and private services, maintaining centralized strategic and operational management of government information and communication systems and ICT projects across sectors. The so-called Bible for Digital Transformation 2020-2025 outlines numerous projects to be implemented in the short-term and long-term, focusing on infrastructure, e-government as well as sectoral development, making use of various funding sources such as European Structural Funds, European research funds, Public Investment Funds, the Recovery Fund as well as loans and private capital. Some important legislative actions include the recent transposition of the EU Directive 2016/2102 on Digital Governance and 2019/1024 on Electronic Communications in Greek legislation, as well as the establishment of the National Accessibility Authority for monitoring compliance of implemented projects with relevant regulatory frameworks.

Electronic accessibility and digital inclusion form a distinct guiding principle in the national strategy for digitalisation and digital transformation, directly linked with selection and evaluation criteria for funding new projects, as well as informing a strand of horizontal interventions, with emphasis on web accessibility compliance of public services, digital skills training and disability related digital platforms. The Digital Strategy outlines possible funding sources, including European Structural Funds, however at the time of writing this report there was not any information about allocated budget across funding streams. Sector specific strategies are embedded and aligned with the objectives of the Bible for Digital Transformation of the Ministry of Digital Governance. Strategic priorities under the Ministry of Labour and Social Affairs directly address disability related services, such as disability assessment and benefits allocation, connected social protection related information systems and registries of persons with disabilities. Disability inclusion is not however adequately addressed in other sector specific government strategies, such as education, where commitments to accessibility and universal design do not instantly materialise in recent legislation introducing science and technology skills workshops in primary and secondary schools.

The National Disability Action Plan (2020) reflects actions included in generic national digital strategies related to electronic accessibility, in particularly those related to accessible digital services and digital transformation of social protection information systems, with emphasis on strengthening disability related data collection systems to inform policymaking. The creation of accessible learning content addressing digital skills is also prominently linked with education and lifelong learning objectives. There are no sector specific strategies addressing disability, while there is overall lack of analysis on opportunities and challenges informing the selected actions in disability related strategic planning. It should also be noted that there is no specific funding earmarked for actions outlined in the National Disability Action Plan.

Up to date evidence on the experiences of persons with disabilities with respect to digitalisation and digital transformation is not available. To an extent this is indicative of low digital maturity in Greece is overall, and is potentially linked to low levels of internet use and digital skills for persons with disabilities. The Concluding Observations of the UN Committee on the Rights of Persons with Disabilities to the initial report of Greece (2019) importantly emphasizes the potential of information and communication

technology in ensuring accessible and inclusive educational environments, which are currently lacking.

Good practices

The establishment of the National Accessibility Authority with the active involvement of representative bodies of persons with disabilities stands out as good practice in ensuring independent monitoring and compliance with relevant regulatory frameworks. This may include for instance ensuring that accessibility standards are fulfilled in relevant funded projects, but also in the provision of mainstream ICT related goods and services. The legislative act that establishes the National Accessibility Authority does not make any reference to specific EU legislation, even though its primary role is to 'monitor international, EU and national frameworks for accessibility'. Its role is rather detailed in relation to national legislation, including ratification of the UN CRPD.

Recommendations

It is important to address the general lack of evidence concerning digitalisation and digital transformation from a disability perspective. It would be important to conduct for instance situation analysis and sector specific baseline assessments to gain understanding of the experiences of persons with disabilities (and other stakeholders) using digital technology and services currently, to identify opportunities and challenges, and to inform targeted project design and implementation. Programmes aiming to address digital inequalities, such as digital skills training, must ensure both accessible content and delivery when addressing the general population as well as disability focused projects that address specific support needs and barriers. Building evidence and learning on this topic could further contribute to increased engagement of public and private actors not only in terms of complying with accessibility standards, but also actively using new digital technologies to transform disability support service provision across sectors in ways that not only increase efficiency, but also empower persons with disabilities. This potential is not adequately addressed in current national disability related and/or digital strategies.

2 Are government strategies and plans on digitalisation and digital transformation disability-inclusive?

2.1 Disability inclusion in generic strategies on digitalisation and digital transformation

The National Digital Strategy 2016-2021 first addressed the need for a new model of governance and management of ICT projects at high-level. The responsibilities for the design, coordination, and monitoring of actions aimed towards digital transformation in the country were centralized under the newly established Ministry of Digital Policy, later renamed as Ministry of Digital Governance.¹ The Ministry is exclusively tasked with setting strategic priorities and ensuring alignment of sector specific action plans, as well as managing central government information and telecommunication systems.²

Using digital technology to ‘combat social exclusion’ and ‘diffusing the benefits of digital economy’ formed a specific priority under the National Strategy 2016-2021 (Priority 6), acknowledging potential digital inequalities owing to geographical and/or social barriers, including lack of digital skills, and promoting ‘accessibility for all, without discrimination’.³ Disability was explicitly mentioned in relation to monitoring and evaluation of web accessibility ‘in compliance with UN CRPD Article 9’, which further foresaw the involvement of representative disability organizations in the process.⁴

Rather than a set of priorities, the Bible for Digital Transformation 2020-2025 provides guidance on cross-cutting strategic interventions, such as interoperability, digital skills and digital innovation, horizontal actions, such as digital public sector transformation, open government and data protection, as well as sector specific action plans (please see section 2.2). ‘Combating exclusion and universal accessibility’, with explicit reference to the ‘needs of persons with disabilities’, forms a guiding principle as well as horizontal action, although there lacks any planning as to how this will be enforced.⁵ Specific projects at short and long term under the latter strand include:⁶

- Strengthening and ensuring compliance of public digital services with web accessibility standards.
- Awareness raising activities across the public sector, including accessibility self-assessment tools and lifelong learning courses, digital skills training and training on design of accessible webpages and digital applications (please see Section 4).
- Development of web platform for registering persons with disabilities, including pupils in special education, persons with dementia and their caregivers, users of psychiatric services connected to public hospitals, interactive map of public and private mental health services, as well as of community- based services.

¹ Hellenic Republic, Ministry of Digital Policy, Telecommunications and Information, General Secretariat of Digital Policy (December 2016) National Digital Strategy 2016-2021 https://www.eydamth.gr/images/site_2017/ArticleID_283/GR_Digital_Strategy_2016_2021.pdf.

² Hellenic Republic, Ministry of Digital Governance (December 2020) Bible for Digital Transformation 2020-2025 <http://www.opengov.gr/digitalandbrief/wp-content/uploads/downloads/2020/12/digitalstrategy.pdf>.

³ Hellenic Republic, Ministry of Digital Policy (2016) p. 35.

⁴ Hellenic Republic, Ministry of Digital Policy (2016) p. 22.

⁵ Hellenic Republic, Ministry of Digital Governance (2020) p. 23.

⁶ Hellenic Republic, Ministry of Digital Governance (2020) p. 154-155.

Overall, the projects outlined in the Bible for Digital Transformation 2020-2025 will be funded through Operational Development Programmes (European Structural Funds), the National Development Plan (Public Investment Programme), national and European research projects, as well as through loans for enhancing digital transformation of businesses, the Recovery Fund, and private capital through private-public sector partnerships.⁷

It is worth mentioning that Law 4727/2020⁸ recently transposed the EU Directive 2016/2102 on Digital Governance and 2019/1024 on Electronic Communications in Greek legislation, which importantly adopts:

- common definition of assistive technology ICT (Article 2 paragraph 57);
- explicit obligation to ensure 'equal access' to digital public services and 'take into consideration specific access needs of certain groups or individuals, especially persons with disabilities' (Article 3 paragraph 4 General principles)
- e-accessibility standards (Article 39), and exceptions based on disproportionate burden (Article 40)
- consultative approach concerning the exercise of rights of end users of network providers and electronic communications, including equal access of persons with disabilities (Article 132 paragraph 1).

It is further stipulated that the Minister of Digital Governance in collaboration with other ministries may take measures (after recommendation by the National Committee of Telecommunication and Postal services) as necessary to ensure that assistive equipment and services to access digital services are available and economically accessible (Article 198).

Finally, the establishment of the National Authority for Accessibility⁹ is anticipated to be instrumental to monitoring the implementation of digital governance and other projects aligned with the national digital strategy, with respect to compliance with e-accessibility standards. It is worth mentioning that government officials, including the General Secretary of Digital Governance, as well as technical experts, and representatives appointed by disabled people's organizations, participate in the National Authority for Accessibility. Additionally, the National Co-federation of Disabled People has been actively involved in government plans for establishing a certification process of accessibility standards based on the National Standard (ELOT 1429) for both public and private sectors.¹⁰

⁷ Hellenic Republic, Ministry of Digital Governance (2020) p. 31.

⁸ Law 4727/2020 Digital Governance, Electronic Communications, and other Regulations Law 4727/2020 <http://www.opengov.gr/digitalandbrief/wp-content/uploads/downloads/2020/12/fek-184-2020.pdf>.

⁹ Draft legislation voted on 23 February 2021 <https://www.hellenicparliament.gr/UserFiles/18a4e643-1429-4e6b-a317-d7c6a29adabf/11578912.pdf>.

¹⁰ 'Greek Accessibility Sign, powerful tool for creating accessible environments' *National Co-federation of Disabled People Press Release* 11 March 2021 <https://www.esamea.gr/pressoffice/press-releases/5180-elliniko-sima-prosbasimotitas-isxyro-ergaleio-gia-ti-dimioyrgia-prosbasimon-periballonton>.

2.2 Disability inclusion in focused or sector-specific strategies on digitalisation and digital transformation

The following sector-specific strategies are embedded in the Bible for Digital Transformation 2020-2025. A general observation is that there are no stand-alone sector-specific strategies on digitalisation and digital transformation. The following two sectors were selected based on their direct relevance of proposed actions for persons with disabilities and/or available commentaries from a disability perspective.

Employment and Social Affairs¹¹

Strategic priorities and actions planned in this sector directly affect persons with disabilities, touching upon digitalization of disability assessment and certification procedures, access to welfare benefits and social protection services. Most actions are concerned with increasing efficiency, by reducing the need for repeated physical presence (e.g. application, re-assessment, notification, and appeal), which has also been viewed as excessive from the user perspective, resulting in long delays and disruption of disability provisions.¹²

The national strategy makes specific reference to the scale up of the pilot of electronic application and allocation of disability welfare benefits, managed by the Organisation of Welfare Benefits and Social Solidarity (OPEKA),¹³ as well as digital transformation of the Disability Assessment and Certification Centres (KEPA), which additionally foresees interoperability among public agencies requiring access to case files, links to electronic prescription and disability benefits information systems, which are currently fragmented.¹⁴ A digital platform for social protection is similarly envisaged to provide seamless information and thus enhanced access to different social protection benefits as well as public and private support services, such as municipal social services, residential care, homeless shelters, etc.

Apart from enhanced efficiency and transparency, and data protection, connected information systems will offer the possibility for data analytics to support policy making taking into consideration disability support needs, social and geographical traits.¹⁵

Finally, the digital strategy for social protection also mentions the need for building the digital skills of welfare service providers. It acknowledges that particularly during the first wave of the COVID-19 pandemic, which disrupted face to face service provision, there was limited capacity overall to transfer services online in terms of infrastructure as much as of digital skills, e.g. provide remote counselling, and recreation of children with disabilities. The strategy however is limited to digital skills training, rather than digital transformation of support services.

¹¹ Hellenic Republic, Ministry of Digital Governance (2020) p. 199-219.

¹² See for instance The Greek Ombudsman (2013) Special Report on KEPA (Centralized Certification Centre for Disability) <http://www.synigoros.gr/resources/docs/130404-special-report.pdf>; Please see also the ANED Disability assessment – country report (2018) for more detailed discussion of disability assessment procedures and related challenges.

¹³ Law 4512/2018 (FEK A 105) Disability welfare benefits provision Pilot Article (17). The pilot was initially implemented in the region of Attika http://opeka.gr/wp-content/uploads/2018/02/pilotiko-pronomiakon-paroxon-atoma-me-anapiria-215_n4512-2018.pdf.

¹⁴ Hellenic Republic, Ministry of Digital Governance (2020) p. 202; 212.

¹⁵ Hellenic Republic, Ministry of Digital Governance (2020) p. 213.

Education¹⁶

Although not directly addressing disability, this sector specific strategy aims to upgrade the digital skills of 165 000 primary and secondary education staff, the digital school services for 1,5 million pupils but also promote a digital learning culture more broadly, while ‘equal access’ to digital educational and related administrative services forms a specific objective.¹⁷ Most of the projects outlined concern improvement of the infrastructure of the existing educational platform (MySchool), including use of open data (data centric, rather than document-centric, registries of individuals participating in the educational process) and enriched digital content and tools for remote learning, as well as digital skills training of teaching staff.

A first legislative step in the strategic direction of ‘upgrading schooling’ through digitalisation, concerns the inclusion of technology and science ‘skills workshops’ in primary and secondary education,¹⁸ which nevertheless makes no explicit provisions for pupils with disabilities, who already face barriers in accessing educational material, including digital tools and content.¹⁹ As the National Co-federation of Disabled People (NCDP) suggests, this piece of legislation is far from promoting inclusive education’.²⁰ It points out that:

‘The “Skills Workshops” is an exceptionally important action for all pupils and particularly for pupils with disability and/or special educational needs, because they train them from an early age on basic skills which are very useful for their socialisation and communication [...] while they can contribute to raising awareness about accessibility and the needs of pupils with disabilities. However, there is no reference about teaching modes for pupils with disabilities and/or special educational needs, nor the integration of those workshops in special education units. In view of Article 24 of the UN Convention on the Rights of Persons with Disabilities, it is necessary to establish workshops which will benefit pupils with disabilities, in terms of developing mobility skills, orientation and daily living, which are also beneficial for pupils without disabilities’.²¹

¹⁶ Hellenic Republic, Ministry of Digital Governance (2020) p. 166-186.

¹⁷ Hellenic Republic, Ministry of Digital Governance (2020) p. 166.

¹⁸ Law 4692/2020 Schools upgrading and other regulations, https://www.minedu.gov.gr/publications/docs2020/nomos_yp_arithm_46922020.pdf.

¹⁹ National Co-federation for Disabled People (2020) Study for the Transition from Special Education to Education without exclusions, Athens available at: <https://paratiritirioanapirias.gr/el/news/publications/69/meleth-gia-th-metabash-apo-thn-eidikh-agwgh-kai-ekpaideysh-sthn-ekpaideysh-xwris-apokleismoys>.

²⁰ ‘The system the Ministry of Education promotes is far from any concept of inclusive education’ NCDP Press Release 1 June 2020 <https://www.esamea.gr/press-office/press-releases/4824-makria-apo-kathe-ennoia-symperiliptikis-ekpaideysis-to-systima-poy-proothei-to-yp-paideias>.

²¹ ‘Letter to Parliament Committee on Educational Affairs Observations and Recommendations on draft legislation “Schools Upgrading and other regulations”’ NCDP Protocol Number 736/01.06.2020 1 June 2020 <https://www.esamea.gr/our-actions/ypdbmth/4823-i-e-s-a-mea-katatheti-sti-boyli-tis-protaseis-paratiriseis-tis-sto-sxedio-nomoy-me-thema-anabathmisi-toy-sxoleiyo-kai-alles-diataxeis>.

3 Do disability strategies address the potential of and challenges pertaining to digitalisation and digital transformation?

3.1 How digitalisation and digital transformation are addressed in the national disability strategy

Overall, the [National Disability Action Plan](#) is aligned with the actions proposed in the Bible for Digital Transformation in the short-term (2020-2023) primarily those concerning the accessibility of digital public services, including public websites and mobile applications, and procedures related to the provision of disability benefits (please see Section 2.2). The benefits of digital transformation in those sectors are viewed mainly in terms of simplification of administrative procedures and reduction of bureaucratic obstacles.

Data collection and use of data for policymaking in the field of disability (Objective 7) is also envisaged to be served well by digital transformation, by ‘mapping disability in the current information systems’ (paragraph 7.4), although this is not elaborated any further in the National Disability Action Plan.²² The creation of ‘accessible digital content’²³ for education is also very briefly mentioned, as well as for wide scale ICT training of persons with disabilities, which is foreseen to be embedded in the National Digital Academy and digital centres²⁴ (please see also section 4). Finally, the involvement of the Ministry of Digital Transformation is also referenced in actions related to enhanced access to justice and civil protection.²⁵

An overall remark is that although the National Disability Action Plan outlines specific objectives, and indicative actions, timelines and authorities involved, across thematic areas such as education, employment, independent living, health, accessibility, social participation, and so on, it lacks analysis informing the proposed actions. There is a lack of evidence about opportunities and challenges related to digitalisation and digital transformation from a disability perspective (please see also section 5 for similar observations). There is no clear prioritization of selected actions and it lacks specific targets and expected outcomes. At the same time, the actions outlined tend to be broad in scope, while there are no explicit links to sector specific strategies and possible funding mechanisms. Although it seems that the National Disability Action Plan primarily intends to list a series of actions, it fails overall to provide details related to selection criteria of relevant projects, implementation, monitoring and evaluation.

3.2 How digitalisation and digital transformation are addressed in specific disability-related strategies

Apart from the National Disability Action plan, no other disability-related strategies or up to date sector focused strategies relevant to the rights of persons with disabilities were identified.

The National Strategy for Development 2030 was reviewed for relevant insights, and the following two references to disability and/or digital transformation are indicative of

²² Hellenic Republic Minister of Interior (acting as National Coordination Mechanism for the implementation of UN CRPD (Law 4488/2017, art. 69) (2020) National Disability Action Plan p.14.

²³ Hellenic Republic Minister of Interior (2020) p.25.

²⁴ Hellenic Republic Minister of Interior (2020) p.29.

²⁵ Hellenic Republic Minister of Interior (2020) pp.36, 37.

the limited sector specific strategic planning as such, as well as limited links to disability rights.

A first related remark is that the last action plan in the field of education concerned the period 2017-2020, which included reforms in special education school grading as well as educational support structures.²⁶ The development plan for 2030 is limited to suggesting that ‘those structures need further support’.²⁷

A second reference is made in relation to ‘a digital mechanism supporting actions for de-institutionalization, which will connect to the foster/adoption system’.²⁸ This is reflected in plans for the digital transformation of social protection services (please see section 2.2), but not clearly articulated as such in actions for de-institutionalization embedded in the National Disability Action plan.

²⁶ DOTCOM - The Academic Network of European Disability experts (ANED) Greece E1- Special schools, <https://www.disability-europe.net/dotcom/text/greece/e1-special-schools>.

²⁷ The National Strategy for Development 2030 (May 2019) p. 102, https://www.espa.gr/el/Documents/2127/Strategy_for_Development_2030_May2019.pdf.

²⁸ The National Strategy for Development 2030 (May 2019) p. 111.

4 Promoting disability inclusion through funding, education and training

4.1 How funding promotes disability-inclusive digitalisation and digital transformation

Any ICT project, regardless of funding source is reviewed and pre-approved by the Ministry of Digital Governance to ensure alignment with the Bible for Digital Transformation, including that is e-accessibility which is an explicit strategic goal. In addition, 'universal design for ensuring accessibility of electronic services, webpages and applications from any device, for persons with disabilities' is a key criterion for evaluating and selecting new project proposals for funding.²⁹

Furthermore, the government has committed to updating national procurement legislation to ensure compliance with the EU Directive 2019/882³⁰ - Accessibility requirements for products and services and the national accessibility standard (ELOT 1439:2013).³¹ As described above (please see section 2.1) the National Accessibility Authority, with the active involvement of representatives of disabled people's organizations, will be a key independent body responsible for monitoring compliance.

4.2 How disability inclusion is promoted through the education and training of digital professionals

With regard to engineers' training in disability issues it is worth noting that the revised disability rights framework (Law 4488/2017) specifies that universities are responsible for including in their study programmes and seminars, training modules which relate to the rights of persons with disability according to the UN CRPD. The content and technical specifications of such programmes shall be defined by the respective Ministries in cooperation with the national Coordination Mechanism and Focal Point for the implementation of the UN CRPD (Law 4488/2017 Article 66, paragraph 2).³² There was no evidence identified suggesting such actions have taken place to date.

It is interesting that the Bible for Digital Transformation makes explicit reference to plans for promoting inclusion of accessibility in higher education training related to design and programming of webpages and digital applications, however this is not elaborated any further.³³

It was not possible to identify any examples of courses integrating accessibility issues in the education and training of digital professionals.³⁴ It is worth noting nevertheless that the Hellenic Association of Assistive Technologies,³⁵ which includes a working

²⁹ Bible for Digital Transformation 2020-2025 p. 29.

³⁰ EU Public Procurement Directives have applied since 2016 (L.4412/2016). The latest modification of national procurement legislation (March 2021) (Article 54, Law 4782/2021) reinstates that technical standards must consider accessibility criteria for persons with disabilities or universal design and that where EU Directives apply, technical standards are defined accordingly.

³¹ Hellenic Republic Minister of Interior (2020) p. 48.

³² ANED DOTCOM database Greece H.5 <https://www.disability-europe.net/dotcom>.

³³ Hellenic Republic, Ministry of Digital Governance (2020) pp. 154-155.

³⁴ It should be noted that this kind of information is very fragmented; there isn't for instance existing research of good practices, and one would need to research the course curriculum of each university. It is understood that to make the case that accessibility is well integrated in the academic training of digital professionals there should be a distinct module or similar knowledge base.

³⁵ <http://www.eeyt.gr/index.php/el/e-prosvasimotita>.

group on e-accessibility, aims to contribute to the training of its members and produce relevant learning material, as well as participating in research projects and disseminating related knowledge through events.

4.3 How digital inclusion and accessibility is addressed in the education and training of accessibility and inclusion professionals

The theme of special education and new technologies stands out for being well integrated in undergraduate and postgraduate academic courses in the country. The field is served in different ways such as a module in mainstream pedagogic studies,³⁶ research departments,³⁷ and ongoing professional development courses offered by higher education institutes.³⁸ There are in addition a number of accredited courses in special education and new technologies provided by private Lifelong Learning Centres.³⁹

4.4 How digital inclusion is addressed via the training of people with disabilities

The most recent calls for tender and projects related to digital skills training, typically funded through European Structural Funds, address the general population. There is no evidence of the extent to which persons with disabilities are able to access those.

A notable example is the Call for proposals (April 2021) addressed to Youth and Lifelong Learning Foundations to develop training programs on telework skills, with a total budget of EUR 15 600 000, with over half of funds allocated to less developed regions in the country.⁴⁰ In addition, there is currently a program for gaining work experience in digital marketing (over 5 000 placements) targeting young people aged 18-29, who have already completed relevant training.⁴¹

Furthermore, the National Digital Academy (nationaldigitalacademy.gov.gr) run by the Ministry of Digital Governance to date provides free access to 279 basic and advanced modules in 31 thematic sectors offered by 37 certified organizations.⁴² The national digital strategy also foresees the creation of 15 digital centres across the country to enhance the digital skills of the general population, including specialized training programs for specific social groups such as persons with disabilities.⁴³

Current specialised vocational training programmes on ICT and related skills for people with disabilities, are typically provided by the Public Employment Organisation (OAED),

³⁶ See for instance curriculum of undergraduate studies in Philosophy and Pedagogy at the Aristotle University of Thessaloniki <https://qa.auth.gr/el/x/class/1/600119241>.

³⁷ See for instance University of Thessalia Workshop of ICT applications in Education and Special Education <https://www.sed.uth.gr/index.php/gr/research-activities/labs/103-sedict-lab>.

³⁸ See for instance University of Macedonia Centre for Training and Lifelong Learning Education and Special Education courses <https://kedivim.uom.gr/education/>.

³⁹ See for instance <https://www.easy-education.gr> and <https://ianap.gr/>.

⁴⁰ 'Training program for gaining telework skills for the general population' <https://www.espa.gr/el/pages/ProclamationsFS.aspx?item=5208>.

⁴¹ 'Program for gaining work experience in digital marketing for 5,000 unemployed youth up to 29' <https://www.espa.gr/el/pages/ProclamationsFS.aspx?item=5171>.

⁴² Ministry of Digital Governance Press Release 2 April 2021 Enrichment of the National Digital Academy with new lessons <https://mindigital.gr/archives/2241>.

⁴³ Hellenic Republic, Ministry of Digital Governance (2020) p. 86.

available only in the two largest urban centres,⁴⁴ or non-profit organisations/ associations of parents of persons with disabilities, supervised by the Ministry of Labour.⁴⁵

⁴⁴ National Manpower Organization Vocational Training Programs for persons with disabilities <https://www.oaed.gr/idikes-koinonikes-omades?tab=epaghghematiki-katartisi-amea&tab2=skholes-epaghghematikis-katartisis-amea&tab3=>.

⁴⁵ Please see for instance <https://www.kea-amea.gr/index.php/gr/ergasthria/tmima-pliροφοrikis>.

5 The opportunities and challenges presented by digitalisation and digital transformation to the rights of persons with disabilities

5.1 The most significant opportunities presented by digitalisation and digital transformation for persons with disabilities

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.⁴⁶ 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 in the political agenda, i.e. National Digital Strategy, National Disability Action Plan, there are no standalone thematic reports and/or information campaigns by the civil society, disabled people's organizations or independent equality bodies on the topic of new technologies and/or digitalisation from a disability perspective. This is arguably reflecting the 'low digital maturity of Greece and small contribution of digital economy' overall (please see also section 5.2 below).⁴⁷

5.2 The most significant challenges faced by persons with disabilities in relation to digitalisation and digital transformation

Despite progress in terms of connectivity in more recent years,⁴⁸ Greece ranks 27th out of 28 Member States in the Digital Economy and Society Index 2020.⁴⁹ Internet usage is below 50 % with 22 % of population having never used the internet.⁵⁰ On EU level, access barriers such as insufficient skills (44 %), equipment costs (26 %) and high cost barriers (24 %) prevent people from using the internet at home.⁵¹ These barriers seem to be particularly relevant for Greece from a disability perspective, given the limited scope of health and social policy provisions for assistive technology and/or accessible digital solutions.⁵² Just over 20 % of the population in Greece have internet user skills and given the limited investment in accessible digital skills training so far (please see

⁴⁶ Athens Network of Collaborating Experts (2014) *New technologies and Disability: Equal opportunities or new forms of exclusion?* Athens, National Co-federation of Disabled People p. 118-119 provides an overview of studies conducted from 2004 to 2008. The study itself provides a rather conceptual framework for assessing the wider theme of new technology and disability, holding the position that "new technologies create both opportunities and risks for social inclusion of persons with disabilities. However, their role in either direction should not be overestimated, given that the roots of social exclusion are linked to deeper causes of social organization and functioning" (p.15). Empirical findings included in the report are considered outdated, especially where it concerns policy review, or evidence of digital divide (2007 data).

⁴⁷ Hellenic Federation of Enterprises (SEV) 2017 Digital Greece Roadmap to Development <https://www.sev.org.gr/vivliothiki-tekmiriosi/erevnes-meletes-2/meleti-me-thema-psifiaki-stratigiki-gia-tin-ellada/>.

⁴⁸ Hellenic Republic, Ministry of Digital Governance (2020) p. 15-16 offers focused analysis of data from the Digital Economic and Social Index (DESI) 2020; it is noted that in 2019 Greece marked progress of 15 percentage points in Next Generation Access high speed broadband communications, placing it 5 percentage points below EU average.

⁴⁹ European Commission (2020) Digital Economy and Society Index (2019 data) <https://digital-strategy.ec.europa.eu/en/policies/desi>.

⁵⁰ European Commission (2020) p. 52.

⁵¹ European Commission (2020) p. 59.

⁵² Accessible Limitless Living (2020) *SUITCEYES Scoping Report on Law and Policy on Deaf blindness, Disability and New Technologies Working Paper-Greece* <https://suitceyes.eu/policy-reports/>.

section 4.4) this is likely to disproportionately affect persons with disabilities. Just over half of people with moderate or severe disabilities in Greece have access to the internet, in contrast with the large majority of non-disabled population (88.1 %), with affordability mentioned as a main reason in a minority of cases only, indicating that lack of skills and/or accessible solutions may be more important factors shaping access to the internet for persons with disabilities.⁵³

As pointed out in Section 5.1, there is limited engagement from non-governmental organisations with the topic of digitalisation and digital transformation and harnessing their potential, as much as addressing challenges, for advancing the rights of persons. There is however notable reference to the limited use of new technologies for enhancing accessible and inclusive education in the UN CRPD Concluding Observations and Recommendations for Greece.⁵⁴

⁵³ Disability Observatory of the National Co-federation of Disabled People (2021) National Disability Report 2020 p. 45 available at: <https://paratiritirioanapirias.gr/el/news/publications/63/e8nikh-ek8esh-gia-thn-anaphria-etoys-2020>.

⁵⁴ UN Committee on the Rights of Persons with Disabilities (2019) 'Concluding Observations on the initial report of Greece' CRPD/C/GRC/CO/1, <http://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=6QkG1d%2fPPRiCAqhKb7yhskOcZ9cO6iPa1r3wEJzoMtZPRIsn2F8be6qzYChDHrmBTMH%2bqHKEyy9lkiKsnfl7vYm%2b%2fX3mXiOTCPBgssnHiOpTdzNgr31DcGr9iV91p4N2>.

6 Conclusions and recommendations

6.1 Conclusions

Greece is characterized by low digital performance, including low levels of digital skills/ use of internet, digital economy, and digitalisation of public services. This is acknowledged in current national digital strategies, which seek to maintain alignment of sector specific digital transformation strategies and governance over ICT projects implemented across the board, to accelerate efforts and ensure effectiveness. Electronic accessibility is adequately mainstreamed in guiding principles, evaluation criteria and cross cutting interventions, however it does not materialise in concrete actions in sector-specific strategies such as education, while allocation of resources is not explicit at this stage.

At the same time, the National Disability Action Plan (2020) is the first coordinated attempt to mainstream disability across policy sectors at national level. Priorities addressing digitalisation are well aligned with disability related actions in the national digital strategy, including timelines and authorities involved. However, there lacks evidence and analysis supporting decision-making in terms of prioritization and/or resource allocation, as well as design and monitoring of programmatic interventions. It is similarly not clear whether actions such as creating accessible digital learning content for education and/or digital skills training will be part of mainstream projects targeting the general population, or specialised projects through separate funding streams.

Finally, the low levels of digital maturity mean that most actions directly addressing disability are concerned with establishing efficient information systems and expanding digital public services at short term, such as disability assessment procedures and allocation of disability benefits, rather than harnessing potential for enhancing accessibility and inclusiveness of services in the long-term, for instance in education or social protection sectors.

6.2 Recommendations

1. Recommendation targeting the Ministry of Digital Governance and the National Co-federation of Disabled People as actors involved in managing funding streams and programs at the intersection of disability and digitalisation:

Allocate resources for situation analysis and sector specific baseline assessments to gain understanding of the experiences of persons with disabilities (and other stakeholders) using digital technology and services currently, identify opportunities and challenges, in order to inform targeted project design, implementation, monitoring and evaluation.

2. Recommendation targeting Ministries involved in designing operational development programs for addressing digital inequalities, including gaining digital skills, the National Accessibility Authority as independent monitoring body:

Ensure a comprehensive approach to disability inclusion in related programming: ensure programs targeting the general population comply with electronic and physical accessibility standards, as well as design and deploy programs that meet

additional support needs of persons with disabilities to access and use digital technology, including information sharing/ provisions for specialised ICT equipment and assistive technology.

3. Recommendation targeting the Minister of Interior, as National Coordination Mechanism as per the UN CRPD informed national disability legal framework, the National Co-federation of Disabled People as representative disabled persons' organisation and state partner in disability policymaking:

Use evidence and learning from the implementation of projects addressing digitalisation and disability to update, refine and elaborate the National Disability Action Plan in ways that further harness the transformative potential of digital technologies, not only in ensuring access to mainstream goods and services, but in instigating innovative quality service provision across sectors.

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