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Patrina Paparrigopoulou

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Max Planck Institute for Social Law and Social Policy
Amalienstrasse 33, D-80799 Munich, Germany
Tel.: +49 (0)89 38602-0
Fax: +49 (0)89 38602-490
E-mail: info@mpisoc.mpg.de
http://www.mpisoc.mpg.de

CONTENT OVERVIEW

LIST OF ABBREVIATIONS

DYPA -- Public Employment Service

EFKA ---Single Social Security Institution

e-EFKA -- Digital National Social Security Institution

ΕΟΠΥΥ-- National Organization for the Provision of Health Services

ESSPROS -------------------------------------European System of Integrated Social Protection Statistics

ETEA -- Single Fund for Supplementary Social Insurance

ETEAEP---------------------------------- Single Fund for Supplementary Social Insurance and Welfare

ETEAPEP--------------------------------- Occupational Supplementary Pension Fund of Personnel of Petrochemical Companies

IKA-ETAM ------------------Institution of Social Insurance – Single Fund for Employees Insurance

OAED -- The Organization for the Employment of Manpower

OPEKA--Social Solidarity Welfare Benefits Organization

TEA --Occupational Pension Funds

TEA-EAPAE-----------------------------------Occupational Insurance Fund for Insurers and Personnel of Insurance Companies

TEAYET---------------------------------Occupational Pension Fund for Employees of Food Commerce

TEAYFE------------------------------------ Occupational Insurance Fund of Pharmaceutical Employees

TEKA--Hellenic Auxiliary Pensions Defined Contributions Fund

TOMY -- Local Health Unit

Legal Journals

DEN --- Bulletin of Labour Law

DtKA--Social Security Law

ThPDD-- Theory and Practice of Public Law

1. INTRODUCTION

In the period 2009-2019, Greece had to cope with serious economic and fiscal difficulties. The country had to agree to a series of reform commitments contained in the 'memoranda'. These crisis responses led to a new order of social protection. Within the framework of the memoranda, the state adopted structural measures which ensured adequate benefits and sustainability, equality and intergenerational solidarity. This report concerns the measures adopted from 2019 to 2022. However, a short presentation of the measures adopted from 2010 to 2019 is necessary to place the current measures in the proper context. In the following paragraphs two periods are distinguished:

1.1. Overview on the Preceding Reform Period

1.1.1. Social Insurance Measures 2010-2015

The measures of the period 2010-2015 relate mainly to social security. They included, on the one hand, significant reductions in benefits and increases in the retirement age as well as the length of insurance. On the other hand, they included a new design, a reform of the pension system (Laws 3863/2010 and 3865/2010), mainly by distinguishing between the 'basic pension' (financed by the state budget) and the 'proportional pension' (financed by contributions). While the majority of these measures were implemented in full, the reform of the pension system was partially implemented and its core provisions (such as the distinction between basic and proportional pension) were postponed to be implemented in 2015.

Within the context of unification, according to Law 3918/2011 the branch of sickness insurance was transferred from the main insurance organizations to the newly founded National Health Service Organization (EOPYY). In addition, within the same context, Law 4238/2014 stipulated that the sickness benefits in kind were to be provided by the National Health System and not by the insurance organization (EOPYY).

Finally, Law 4252/2012 consolidated the supplementary social insurance organizations into a single organization called 'Single Fund for Supplementary Social Insurance (ETEA)', and Law 4225/2014 provided that the contributions of 'new insured persons' (i.e. those who entered the labor market after 1/01/1993) and 'old insured persons' (those who entered the labor market before 1/01/1993) are the same.

1.1.2. Social Insurance Measures 2015-2019

In the period 2015-2019, the reform of the pension system was realized thanks to Law 4387/2016. The key changes are: 1. the distinction of the national pension from the contributory pension (which was already provided for by Law 3863/2010 with the similar terms ‘basic pension’ and ‘proportional’ respectively, but which had not been implemented); 2. the consolidation of the main social security funds into the 'Single Social Security Institution

(EFKA)', which was renamed the 'Digital National Social Security Institution (e-EFKA)' in 2019; 3. the calculation of pensions based on earnings on which pension contributions were paid throughout the entire working life[1]; and 4. uniform rules on pension contributions of employees and non-employees, based on their income.

In addition, all the existing lump sum benefit funds formed part of the ETEA. The ETEA was hence renamed to 'Single Fund for Supplementary Social Insurance and Welfare (ETEAEP)'.

1.1.3. Case Law of the Supreme Courts

The reform of the social insurance system consisted therefore in the creation of single institutions per insured risk (e-EFKA for the coverage of the risks of old age, disability and death, EOPYY for the coverage of sickness, ETEAEP for the supplementary coverage and OAED for the coverage of unemployment) and uniformity in contributions and benefits.

The main provisions of the reform concerning reductions of benefits, uniformity of contributions and institutional consolidations have been challenged before the Council of State (which is competent for social insurance litigations apart from pensions for public servants) and the Court of Auditors (which is competent for litigations on pensions for public servants). The decisions of the above courts reversed important aspects of the regulatory framework, especially of Law 4387/2016, and clarified the content of Article 22 § 5 of the Constitution, which establishes the right to social insurance.

1. The Decision of the Plenary Session of the Council of State 1889/2019 examined the extent of the state's 'guarantee responsibility' holding that the main and supplementary compulsory insurance organizations must exhaust every possibility to cover any deficits, even by reducing pensions, and only if the benefits become 'insufficient', the state must provide financial aid to EFKA. The Council of State also ruled that contributory pensions were sufficient if they corresponded to at least 50% of 'pensionable earnings'.

2. The Decision of the Plenary Session of the Council of State 1880/2019 clarified that non-employees (term used by the legislator and the case law that indicates self-employed persons, freelancers and farmers) were a distinct category separate from employees, because they gained their income under different circumstances and fell under different tax provisions. For this reason, the imposition by Law 4387/2016 of uniform rules on pension contributions of employees and non-employees constituted unequal treatment.

3. Decision 20/2020 of the Plenary Session of the Court of Auditors held that the social insurance of public (civil and military) servants did not fall within the scope of Article 22 § 5 of

[1] According to Law 3863/2010 and 3865/2010, the general rules for retirement are 40 years of insurance and reaching the age of 62, or at least 15 years of insurance and reaching the age of 67 for a full pension, and at least 15 years of insurance and reaching the age of 62 for a reduced pension. Numerous exceptions and transitional arrangements exist.

the Constitution, because it constituted an extension of their service to the state. Civil servants maintain a special insurance scheme that deviates from the comparable scheme of employees. Therefore, the consolidation is undermined, because the state is not relieved from its constitutional obligation to insure them, and e-EFKA is additionally and to the same extent liable.

4. The Council of State in decisions of its Plenary Session ruled that the pension cuts based on Laws 4051/2012 and 4093/2012 were not compatible with the Constitution (Articles 4§ 1 and 5, 22 §5, 25 §§ 1 and 4), and also not with Article 1 of the First Additional Protocol to the European Convention on Human Rights (e.g. 2192/2014, 2288/2015).

1.2. The Aftermath of the Social Insurance Reform Period

In the immediately following period (2019 onwards) the legislator took additional measures for institutional unification and compliance with the jurisprudence of the Supreme Courts by enacting Law 4670/2020[2]. This law renames EFKA as e-EFKA, provides for a different basis for levying contributions for non-employees and integrates the ETEAEP into the e-EFKA (in two separate branches, one for supplementary insurance and the other for lump sum benefits). The law also increases the replacement rates, so that for 40 years of insurance they correspond to at least 50% of pensionable earnings. Shortly afterwards, the legislator enacted Law 4826/21 'Insurance Reform for the Young Generation'[3], which created the 'Hellenic Auxiliary Pensions Defined Contributions Fund' (TEKA) in which persons who enter the labor market from 2022 onwards are compulsorily insured. This law gradually leads to the abolition of the supplementary insurance branch of the e-EFKA (formerly ETEA).

In the period 2019-2022, the state had to contend with implementation difficulties due not only to the complexity of legislation but also to new case law which largely repealed this legislation. Important challenges were as follows: 1. Consolidation had not yet been achieved because despite the creation of single institutions distinct statutory provisions still remain in force. 2. The lack of digitalisation of files before 2002 had led to pensions being calculated not on the basis of pensionable earnings over the entire working life, but on the basis of pensionable earnings from 2002 until the submission of the pension application. 3. Even greater problems were created by the huge number of pensions that had to be recalculated. In particular, pensions granted before the entry into force of Law 4387/2016 had to be recalculated in order to offset the differences with the new calculation system introduced by Law 4387/2016. In addition, pensions calculated with the initial replacement rates of Law 4387/2016 had to be recalculated according to the jurisprudence of the Supreme Courts. Recalculations were also necessary in order to include the parallel insurance time that a large number of insured persons had accumulated and that had not been counted in their pensions,

[2] 'Insurance reform and digital transformation of the National Social Security Organization (e-EFKA) and other provisions', Government Gazette A 43, 28.2.2020.
[3] Government Gazette A 160, 12.9.2021.

while Law 4387/2016 provided for it. The e-EFKA could not cope with the wave of new calculations and recalculations. Adaptation was necessary in terms of substantive and procedural rules on its operation. In 2021, while adaptation was still in process, the Minister of Labor and Social Security acknowledged in a press interview that over 300,000 main pensions were pending, creating huge social problems[4]. Therefore, in the period 2019-22, the state took measures to simplify substantive rules and procedures and to introduce digital reform and automation. Thus, the greatest challenge of this period was the administrative and digital reform of the e-EFKA and the simplification of legislation to ensure faster and correct implementation of the legal frameworks.

1.3. Social Spending and Economic Conditions

Social protection in Greece traditionally focuses on social insurance. Over time, pensions have become the main mechanism for the reduction of poverty. Social welfare benefits had been of limited importance – until the economic crisis hit Greece (2010-2019). According to OECD statistics on social spending for 2019[5], Greece spends 15.6% of GDP on pensions, out of a total social spending of 24.7% of GDP. Social spending as a percentage of GDP is above the European average of 19.9% of GDP. The remaining 9.1% of GDP (24.7% - 15.6%) is used to finance all other social spending, i.e. public health and social welfare, and is clearly low. In other words, support for vulnerable groups of the population is small, preventing their economic and social integration and perpetuating the risk of poverty in the country. The percentage distribution of ESSPROS social expenditures confirms that most of it has been spent on old-age pensions over time.[6]

	2010	2015	2019	2020
Old age	47	57	53.7	53.1
Sickness	26.6	19.1	21.2	21.2
Disability	6.4	4.3	4.3	3.9
Survivor's	9.4	10.8	9.4	9.7
Family	4.0	4.1	6.2	5.4
Unemployment	6.2	3.6	6.2	5.4
Housing	0.2	–	–	–
Social Exclusion	0.2	0.5	1.7	1.6

[4] Enikonomia.gr, 24.1.2021 'General mobilization for 300,000 pending pensions".

[5] See https://www.oecd.org/social/expenditure.htm

[6] See Hellenic Statistics Authority (ELSTAT), Living Conditions in Greece, 5.5.2023, p. 79.

During the years 2010-2019 the country experienced an intense economic and financial crisis. The need for protection increased, but the funds available from the state budget remained the same or were even lower, as GDP had shrunk. The period 2009-2016 revealed the inadequacies of the welfare system in the harshest way. The economically weaker and vulnerable groups were hit hard, although the poverty rate remained relatively stable (from 20% in 2008 to 23% in 2013), because average income fell significantly. Poverty did not impact pensioners as hard, because for the most part their income remained at a relatively decent level. Poverty mainly affected the unemployed and self-employed people who had low incomes, were younger and had more family responsibilities. Moreover, the decline in average income had resulted in the impoverishment of middle-income earners who had not been poor previously.[7] The increase in the rate of inability to repay loans is a characteristic phenomenon of the period. This impoverishment of the population, without the elaboration of alternative scenarios and a comprehensive study of the measures and their effects, has been examined and condemned by the Council of State, the Council of Europe, and the European Council.[8] From 2016 onwards, efforts have been made to introduce and deepen the welfare measures. The guaranteed minimum income was piloted in some regions of the country in 2016. In 2019, it was generalized and applied throughout the country. This measure, as will be described below, makes a decisive contribution to tackling poverty and to the professional and social integration of beneficiaries. In the years 2019-22 the state sought not only to maintain and further deepen welfare measures but also to reorganize the primary health care services.

In early 2020, the economic situation had improved, and Greece seemed to be able to overcome the deep recession provoked by the international financial crisis of 2008. Real GDP had shown modest growth rates since 2014, with an annual increase of about 2% in 2018 and 2019[9].

[7] Tsakloglou P. 'Guaranteed minimum income or targeted welfare measures?', in the Proceedings of the Conference organized in Athens by the Union for the Protection of Social Rights on the theme: social security as a precondition for economic growth and cohesion. Insurance reform and crisis, (eds. Anagnostou-Dedouli A. and Paparrigopoulou P.), published by the Association of Social Security Institutions of Greece, ed. Papazisis, 2016, p. 107 s.; Georgiadis Th., 'Findings on the impact of the crisis on the income situation of pensioners and the working age population in Greece', published in the Proceedings of the same conference, p. 139, which shows that during the crisis the age profile of poverty in Greece has been reversed. Poverty was not 'grey in color' as it had been before the crisis, but mainly affected the unemployed, migrants and those in low-intensity employment (p. 112).
[8] See, indicatively, Council of State, Plenary Session, Decisions 2287-2291/2015. Also, the Decision of 7/12/2012 of the European Committee of Social Rights (Complaint No. 76/2023) found that the measures introduced by the legislator (that applied the Memoranda) impoverished the population, as they did not examine the overall burdens and were not based on an assessment of their economic and social impact.
[9] See Betcherman et al., Reacting Quickly and Protecting Jobs: The Short-Term Impacts of the COVID-19 Lockdown on the Greek Labor Market, in: Monastiriotis/Katsinas (eds), The Economic Impact of COVID-19 in Greece, Hellenic Observatory Papers on Greece and South-East Europe, LSE, September 2020, p. 21.

In 2019, the unemployment rate stood at 17.5%, and has declined continuously since then: to 17.1% in 2020, to 13.3% in 2021, and down to 12.1% in 2022.[10] The annual rate of unemployment remains above the EU average, although it has slowly declined. The unemployment rate by gender shows that women are much more affected by unemployment. In 2019, women's unemployment rate was at 21.6% and men's unemployment rate at 14.2%, in 2020 the percentage was 21.3% for women and 13.9% for men, in 2021 it was 17.8% for women and 9.7% for men, and in 2022 it was 15.5% for women and 9.4% for men. The outbreak of the COVID-19 pandemic put at risk again the economic and social situation of the country. This prompted the state to adopt a series of mostly temporary measures to support jobs and income as did the majority of EU Member States.[11]

The most important specific measures for the period 2019 -2022 are analyzed below.

2. SOCIAL INSURANCE 2019-2022

2.1. Main Characteristics

Since January 2017, pensions have been based on a unified multi-tier (public) statutory pension scheme (Law 4387/2016). Up to the end of 2021, it consisted of four parts: 1) a national non-contributory pension, 2) a compulsory contributory (primary) pension operated as a PAYG system, 3) a contributory supplementary (secondary) pension, operated as a scheme with Notional Defined Contributions (NDC), and 4) lump sum retirement benefits for certain categories of salaried employees, provided under a contributory NDC scheme.

The main measures of the period 2019-2022 follow two directions: On the one hand, they aim to adapt to the decisions of the supreme courts that either annulled important provisions of Law 4387/2016 or considered certain pension reductions unconstitutional. On the other hand, they aim to digitize the system and simplify legislation and procedures. In addition, in the period 2019-2022, a compulsory funded supplementary (secondary) pension was introduced for those entering the labor market after 2022, alongside a contributory supplementary (secondary) pension, which takes the form of a Notional Defined Contributions (NDC) scheme and which insures those who entered the labor market before 2022.

2.2. Old-Age Pension Insurance

Article 1A of Law 4387/2016 of 12 May 2016, which was added by Law 4670/2020 stipulates that: 'The State shall guarantee and ensure the adequacy of main and supplementary

[10] ELSTAT, Labour Force Survey, September 2023, p. 2, table 2.
[11] Recovery Plan for Europe, published on the EU website, https://ec.europa.eu/info/strategy/recovery-plan-europe_en, for an assessment, cf. Poulou, A., Social and Labour Market Policy during the COVID-19 Pandemic in Greece, in: Becker/Seemann (eds.), Protecting Livelihoods. A Global Comparison of Social Law Responses to the COVID-19 Crisis, 2022, pp. 229 ff.

insurance benefits and the sustainability of the e-EFKA'. With this wording, the legislator combines adequacy with sustainability and complies with Decision 1889/2019 of the Council of State. In addition, Law 4670/2020 improved the replacement rate of the contributory pension, modified the basis for calculating the contributions of self-employed persons, freelancers and farmers, improved the service for insured persons through the use of digital means, and integrated supplementary insurance and lump sum benefits into e-EFKA. Shortly afterwards, Law 4826/2021 changed the funding mechanism of the compulsory supplementary pension insurance and created a new insurance organization for those insured for the first time after 01/01/2022, called the 'Hellenic Auxiliary Pensions Defined Contributions Fund (TEKA)'.

One regulation of particular interest concerns the possibility for pensioners who have less than 15 years of insurance and have reached the age of 67 to buy up to 150 days to complete the required 15 years of insurance and retire. Article 53 of Law 4921/2022[12] provides that insured persons who reach the age of 67 and have completed 4,350 to 4,499 days of actual insurance, may be credited with up to 150 days of insurance for their retirement. Until now, the legislation provided that if the required period of insurance and/or the retirement age have not been reached, the insured person does not receive any benefit and the contributions paid are not refunded. Law 4921/2022 makes it easier for some insured persons to retire. This provision is accompanied by others that make it easier for non-employed persons to pay their debts so that they can retire, the latter of which is not allowed if they have debts (Law 4611/2019)[13].

2.3. Survivors' Pension

Greek pension insurance provides benefits for surviving spouses, divorced spouses and surviving civil partners. Law 3719/2008[14] has established the civil partnership for hetero-sexual couples and Article 16 of Law 4356/2015[15] has extended it to same-sex couples. According to Article 16 of Law 4387/2016, the partner in the civil partnership agreement is fully assimilated to the spouse in terms of any social security or welfare rights. During the crisis, the pension rate for surviving spouses had decreased and the duration requirements for the marriage or cohabitation agreement for the granting of the pension had been increased. In 2019, Article 19 of Law 4611/2019[16] increased once again the benefit amount for surviving spouses or partners from 50% to 70% of the pension their late partner or spouse had been entitled to receive, while the number of years of marriage or civil partnership required to be entitled to a survivor’s pension were reduced from five to three years.

[12] Government Gazette A 75, 18.4.2022.
[13] Government Gazette A 73, 17.10.2019.
[14] Government Gazette A 246, 26.11.2008.
[15] Government Gazette A 181, 24.12.2015.
[16] Government Gazette A 73, 17.5.2019.

2.4. Re-Organization of the Pension Insurance

2.4.1. The Integration of ETEAEP into the e-EFKA

Law 4670/2020 integrated the Compulsory Supplementary Insurance and Lump Sum Benefits Organization (ETEAEP) into e-EFKA. Thus, all pension benefits (main pension, supplementary pensions and lump sum benefits) are awarded by this organization. Therefore, old age, disability and death risks are now covered by a single organization. Despite the single organizational structure, the insurance legislation is not uniform. e-EFKA is an 'umbrella' under which all the former main and supplementary insurance organizations and lump sum benefit organizations have been placed. However, what has been unified is the way in which the supplementary pension and lump sum benefits are calculated.

2.4.2. Administrative Challenges

Without technical measures, the reforms of the previous period could not be implemented, and they were in danger of remaining on paper. Due to thousands of unenforced court decisions and the discontent and lack of confidence of the insured and pensioners in the institution of social security, a social problem with pending pensions had already arisen. Digitization measures are not simply a field to be tackled by computers or programs. It involves fundamental changes in the way the administration operates and adaptation of the legislation. Furthermore, many digitization measures have been referred to the Council of State for a ruling on their constitutionality. Behind the test of constitutionality lies the fundamental question of the extent of the state's obligation to provide social security under the Greek Constitution, and whether social security must be provided exclusively by state-run institutions (i.e. by public bodies according to the 'organic' theory) or whether non-state service providers can also be involved so that the state only has to guarantee the protective functions ('functional theory').

Until the introduction of Law 4921/2022 (Articles 48-54), retirement was subject to the submission of an application, the meeting of the pension requirements, and then the issuance of a pension decision. In the period 2010-2019, a large number of workers applied for early retirement aiming to take advantage of the various transitional provisions of social insurance legislation. Hence, a large number of workers of the social insurance organizations left. The new staff lacked experience and knowledge, and the legislation with its numerous transitional provisions made the control process of the pension requirements extremely slow. In addition, many data in the insured persons' files had not been digitized. Applications piled up, making it difficult for a large number of citizens that had expected to receive their pensions within a reasonable timeframe to actually receive it. The situation became critical because e-EFKA had to calculate pensions according to Law 4387/2016, recalculate pensions awarded before Law 4387/2016 entered into force, and comply with the case law of the supreme courts concerning some of the pension cuts of the period 2010-2015 that were found to be contrary to the Constitution and had been annulled.

In order to ensure that pensions were granted quickly, the legislator drastically changed the way in which the pension applications were processed and pensions were granted by way of introducing Law 4921/2022. From April 2022 onwards, pensions have been issued within three months of submission of the online application. If a pension decision is not issued in time, the 'fast-track procedure' is followed and the decision is issued on the basis of the data in the computerized systems of the e-EFKA without the need to check them. If the applicant has submitted via his/her electronic application data for additional insurance time compared to the time indicated in the computerized systems of the e-EFKA, this time is accepted and included in the insurance time without verification before the decision is issued. In this case, he/she will have to submit the documents to e-EFKA within 15 days after the application. The verification is carried out ex post within three years from the issuance of the decision and in no case after five years by e-EFKA on the basis of the data kept in its records (meaning not only the computerized records) and the documents submitted by the insured person. Problems, of course, still remain. Fast track pensions have a temporary nature since they can be checked ex post and, due to the complexity of the legislation and the rules of long-standing law, errors are likely to occur. Therefore, Law 4921/2022 improves the situation, but if the data in each insured person's file are not fully digitized, security and predictability are undermined and administrative problems continue to exist.

Another means of ensuring that the pension is awarded quickly is the participation of certified lawyers and accountants in the proceedings. The cooperation between the public and private sectors in social security in Greece has always been legally difficult. The Council of State has consistently held that social security is a public service to be guaranteed by state-run bodies only. Therefore, social security is provided only by the state or public legal entities. Recently, the legislator has provided in Article 255 of Law 4798/2021[17] that certified lawyers and accountants may prepare the pension file and upload the certificates and draft decisions electronically, so that they can be checked within a month by e-EFKA employees before they proceed with the issuing of pension decisions. This provision, which also introduces technological changes, is intended to speed up the granting of benefits and is prima facie of a temporary nature. But if it works, it may remain as a form of modern administration based on the cooperation between certified professionals and e-EFKA officials. This regulation was questioned as to its constitutionality by the trade unions of e-EFKA employees. By Decision 750/2023, the Council of State recognized the constitutionality of the measure.

Since after 2022, the legislator has chosen to trust individuals, to trust insured persons and pensioners, and to follow the principles of transparency, objectivity and accountability. For the Greek public administration this is a world-changing circumstance. The new framework is not limited to issuing unilateral administrative acts and in particular pension decisions, but it standardizes procedures, uses technology, cooperates with certified partners and upgrades supervisory mechanisms.

[17] Government Gazette A 68, 24.4.2021.

2.5. The New 'Hellenic Auxiliary Pensions Defined Contributions Fund' (TEKA)

A significant reform of 'supplementary' pensions which are part of the statutory pension scheme was adopted in 2021. Law 4826/2021 provided for a gradual transition from a (compulsory) pay-as-you-go Notional Defined Contributions (NDC) scheme to a fully funded DC scheme. The central feature of the new system is the introduction of a compulsory scheme with individual accounts for supplementary pensions of new entrants to the labor market in 2022. Young people up to the age of 35 (born after 01/01/1987) can opt for voluntary affiliation.

The new capitalization fund TEKA attempts to anticipate demographic developments and long periods of recession by focusing on the accumulation of reserves and their investment in the real economy. The investment function is of prime importance for the TEKA. The supplementary pension is the sum of contributions and their returns after deduction of operating costs. TEKA is not a pension fund and therefore EU Directive 2346/2016 is not applicable. Hence, the insured person has no property rights in his/her personal account. The amounts in individual accounts and the returns on investments are assets of the insurance organization and are used to finance pensions. The insurance organization invests on the basis of a specific institutional framework. The insured person acquires a property right when he or she becomes entitled to a pension in accordance with the legislation of the insurance institution. TEKA is organized and operates according to rules similar to those of occupational pension schemes. Replacing occupational insurance with supplementary insurance was not an option for the legislator, as the Constitution stipulates, according to the prevailing case law of the Council of State, that statutory social insurance must be provided by the state or the public sector.

With regard to the high transitional costs of this reform and, in particular, with regard to the financing of the pensions of those insured under the pay-as-you-go scheme of supplementary social insurance (e-EFKA, former ETEA) the legislator introduced a special guarantee. According to Article 59 of Law 4826/2021, the state ensures that the reduction in the resources of the supplementary pension branch of the e-EFKA is covered. It also ensures the adequacy of the benefits over time. This article, however, does not provide anything more specific and leaves the issue of covering the deficit to be settled by a Joint Ministerial Decision of the Ministers of Finance and Labor and Social Insurance.

There was strong opposition to the introduction of the new scheme for supplementary pensions. The opposition considered it inconsistent with the constitutionally guaranteed institution of public social insurance and questioned its effectiveness and the adequacy of the benefits in the event of future negative market fluctuations. However, the new scheme's pension financing method is in line with the Constitution, because supplementary social insurance remains solely public. In any case, the state guarantees both the supplementary insurance pay-as-you-go scheme and the funded scheme. For the funded system, however, the state guarantees only the contributions paid and a minimum return. In addition, the state follows a strict system of supervision. The viability of the new funded supplementary scheme and the adequacy of pensions are to be seen, as the maintenance of the level of pensions depends on two crucial factors, namely economic growth rates and demographic indicators.

The above developments and changes require further rules, mechanisms and supervisory tools. The supervision of organizations and funds that operate on a funded basis (in particular the occupational pension funds (TEA) and TEKA, differs from the supervision of organizations that operate on a pay-as-you-go and intergenerational solidarity basis (e-EFKA). The investment function is of primary importance to the funded scheme. Since 2002, the legislator has delegated the actuarial supervision and the supervision of investments to the National Actuarial Authority and the Securities and Exchange Commission respectively.

2.6. Occupational Pension Funds (TEA)

Apart from the statutory pension scheme, the Greek pension system also includes a few supplementary (voluntary) pension schemes, which can, in some cases, be occupational pension funds. They operate as funded schemes. In 2021, there were 21 occupational pension funds that provide benefits in monthly annuities or as a lump sum. Although the number of occupational pension funds has increased in recent years, their importance remains small both in terms of the number of insured persons and the amount of reserves they manage.

Moreover, the Greek pension system includes four mandatory supplementary occupational pension schemes: The Occupational Insurance Fund for Insurers and Personnel of Insurance Companies (TEA-EAPAE), the Occupational Insurance Fund of Pharmaceutical Employees (TEAYFE), the Occupational Supplementary Pension Fund of Personnel of Petrochemical Companies (ETEAPEP) and the Occupational Pension Fund for Employees of Food Commerce (TEAYET). These four funds are, according to the case law of the Council of State, 'dual legal entities' as they operate as a substitute for the public supplementary insurance scheme. Therefore, these institutions are considered as exercising public authority and issuers of administrative acts with regard to insurance affiliation, the contributions and the pensions they grant. The case law of the Council of State has accepted this 'hybrid' nature, because it explicitly safeguards state control and public service principles.

In 2020, EU Directive 2346/2016 concerning occupational pensions was implemented by Law 4680/2020[18] in a rather formal way, i.e. by simply translating the Directive. Based on this law, ministerial decisions have been issued regarding solvency margins, accounting data, actuarial studies, etc.[19]

[18] Government Gazette A 72, 23.3.2020.

[19] Important ministerial decisions based on the authorizations of Law 4680/2020:
- F.51220/103597/2021 (Government Gazette B 72), 'Formation of technical provisions of the IESP-TEA and details concerning the application of Article 12 of Law 4680/2020'.
- F.51220/26386/2021 (Government Gazette B 2007), 'Method of calculation of the required solvency margin for IESP-TEA'.
- F.51220/55418/2021 (Government Gazette B 3728), 'Content of the actuarial report from the IESP-TEAs to the National Actuarial Authority'.

The Ministry of Labour and Social Security has long announced the reform of the legislation on occupational pension funds. The main reforms considered are the consolidation of supervision, the introduction of multi-employer funds, the review of tax incentives, the clarification of the relationship with the third pillar (private insurance) and of the operating rules, especially for small funds.

2.7. Financing Issues

2.7.1. Contribution Rules for Non-Employees

With Law 4670/2020, the legislator has differentiated between the contributions of non-employees and those of employees and civil servants, in compliance with Decision 1880/2019 of the Council of State (Plenary Session).

According to Law 4387/2016, non-employees were obliged to pay 20% of their monthly income, as determined on the basis of the net taxable income from their activity in the previous tax year. The contribution rate to the e-EFKA was reduced to 13.33% in 2019.[20] During the period from 01/01/2017 to 31/12/2019, contributions of non-employees for sickness insurance were 6.95% of their earnings (6.45% for benefits in kind, and 0.50% for cash benefits), and they were 7% for supplementary pensions and 4% for lump sum benefits.

As of January 2020, social insurance contributions for the main pension and for sickness insurance of non-employed persons are no longer linked to their declared income, but are based on one out of six social insurance categories at their choice. Each category corresponds to predefined amounts for the contributory (primary) pension. For supplementary pension and for lump sum benefits three categories are available. If non-employees do not choose, or until they choose, they are compulsorily assigned to the first insurance category. The application for category selection can be made online at any time, but is valid from January of the following year. For non-employees who have less than five years of insurance, a special insurance category with lower contributions is provided. This special insurance category can be used only once and does not apply to pensioners who take up work after retirement. More favorable categories apply to farmers, yet their contributions are gradually assimilated to those of other non-employees.

- F.51220/263752021 (Government Gazette B 2007), 'Determination of individual limits and limitation of investments of IESP- TEA and details of the application of Article 18 of Law 4680/2020.
- F.51220/51546/2021 (Government Gazette B 227), 'Content and format of annual accounts and minimum content of annual reports of the IESP-TEA'.
- F.51220/76359/2021 (Government Gazette B 5063), 'Exercise of cross-border activity and cross-border transfer of IESP and details of the implementation of Article 10 of Law 4680/2020'.

[20] Law 4578/2018 'Reduction of Insurance Contributions and other Provisions", Government Gazette A 200, 3.12.2018, applicable from 01/01/2019 to 31/12/2019.

The insurance categories for the main pension and sickness branches for non–employees (apart from farmers) are as follows:

Insurance Category	Main Pension (€)	Sickness (€)	Total Amount (€)
1st	155	55	210
2nd	186	66	252
3rd	236	66	302
4th	297	66	363
5th	369	66	435
6th	500	66	566

With the above insurance contributions, additional contributions of 10€ are collected (by e-EFKA) for the Unemployment Scheme, and of 2€ from Health Care Workers for the Health Care Workers' Home.

As of January 2020, non-employees (apart from farmers) can choose from the three following contribution categories:

Insurance Category	Supplementary Pension €	Lump Sum Benefits €
1st	42	26
2nd	51	31
3rd	61	37

In this way, however, it is clear that on the same income, the pensions (main and supplementary) and lump sum benefits of non-employees who opt for the lower insurance categories will be lower than those of employees and civil servants.

2.7.2. New Time Limitations for Unpaid Contributions

Non-compliance with the obligation to pay social contributions raises several problems: For how many years can the pension insurance organization claim the payment of contributions for past employment periods? To what extent can compulsory contributions be paid retroactively after the relevant period of employment in order to avoid gaps in protection? This depends on the limitation periods that apply to subsequent payments. Until recently, the Greek limitation period for this was 20 years.

By Decision 1833/2021, the Plenary Session of the Council of State held that the provision on the limitation period of 20 years (Article 95 of Law 4387/2016) was contrary to the Constitution, because the lengthy period was not reasonable and not in line with the one established in Article 25 § 1(d) of the Constitution. It was also held that this limitation period violated the principle of legal certainty to the extent that the provision that had established it applied retroactively, i.e. also to claims that had arisen before its entry into force. That period and the retroactive effect could not be justified by organizational and operational shortcomings nor by a possible inactivity on the part of the insurance organizations. The Court replaced the unconstitutional provision with a maximum 10-year limitation period. This 10-year limitation period had been in effect for the former insurance organization 'IKA-ETAM'[21] before the reform through Law 4387/2016. It should be noted that the Court's judgment aligns the limitation period for unpaid contributions with the limitation period for unpaid taxes, which shows that these are public charges whose regulation follows the same constitutional principles.

Due to the above decision of the Council of State, Article 95 of Law 4387/2016 was amended by Article 6 of Law 4997/2022[22] and a 10-year limitation period is currently provided. From 01/01/2026 onward the limitation period will be 5 years. Law 4997/2022 also stipulates that debts of non-employees that have fallen under the statute of limitations at the request of the insured persons may be paid (together with the surcharges and fines) in order to accrue the insurance period for the establishment of the pension right as well as for the increase of the pension amount. In practice, a large number of non-employees have been able to claim a pension.

[21] Institution of Social Insurance – Single Fund for Employees Insurance which insured employed persons and was the largest insurance organization in the country before the creation of EFKA.
[22] Government Gazette A 219, 25.11.2022.

3. FAMILY BENEFITS AND SERVICES

3.1. Childbirth Allowance

Established by Articles 1-14 of Law 4659/2020[23], it corresponds to the amount of EUR 2,000 for each child born in Greece. The beneficiary is the mother who has not lost custody of the child. In case of death or culpable abandonment of the child, the beneficiary is the father who has custody of the child and in any other case, the beneficiary is the person who has custody of the child. The applicant must reside in Greece, have an equivalent annual income of up to EUR 40,000 and apply within three months of the birth. For mothers who are third-country nationals, legal and permanent residence in the country for the 12 years prior to the birth is required.

3.2. Neighborhood Nannies

It is a pilot program introduced and implemented in selected areas of the country under Article 40 of Law 4837/2021[24]. In the period 2023-2027, the program is planned to be extended throughout the country. The aim of the program is to allow women to remain in the labor market after the birth of their child. In practice, the program covers the gaps in public day care centers (nurseries) that cannot meet the needs of parents and persons who have custody of children. Until the introduction of the program it was estimated that about 1/3 of the applications for enrolment in public nurseries were declined, since the centers could not accept any more children due to lack of open positions. Upon universal implementation of the program, every parent or person having custody of an infant or young child will be entitled to receive the services. The program relies on certified 'caregivers' offering care services to infants (of up to 12 months) and toddlers (of 12 months to 30 months of age) either in the children's home or in their own home. The choice of caregiver is made by the beneficiary parent or the person having custody of the child through an information system maintained by the General Secretariat for Demographic and Family Policy and Gender Equality. The guardian must have the qualifications specified in Article 42 of the Law.

4. UNEMPLOYMENT SCHEMES AND EMPLOYMENT PROMOTION

The institutional framework provided mainly for subsidies for the unemployed, either in the form of social insurance for those who qualify for social insurance unemployment benefits, or on the basis of welfare for the long-term unemployed. In the 2019-2022 period, the legislator introduced employment counseling. Article 60 of Law 4837/2021 introduces employment counseling services aiming at preparing and supporting the unemployed for integration or reintegration into the labor market and matching the jobseekers’ profiles with the job

[23] Government Gazette A 21, 3.2.2020.
[24] Government Gazette A 178, 1.10.2021.

employers' profiles. Job counselors are divided into jobseekers' counselors and employers' counselors.

Jobseekers' advisers investigate the jobseekers' profiles, interview them, draw up individual action plans and monitor their implementation. They also carry out group counseling activities and cooperate with employers' advisers. Employers' advisers are the contact persons of the Employment Promotion Centers of the Employment Promotion Agency with the enterprises that approach them. The group counseling services are mainly career guidance counseling, counseling on job search techniques and counseling on entrepreneurship.

5. WELFARE BENEFITS AND SOCIAL ASSISTANCE

Before Greece was hit by the pandemic, the country had lived through a long economic crisis, during which the percentage of people at risk of poverty or material deprivation remained at high levels. During the period 2010-2019, several initiatives were taken to support social integration and reintegration of the most vulnerable groups, such as families in extreme poverty and homeless people. In addition, action plans for specific groups were set up, especially for children, for Roma people and for the disabled. A special focus was on income support and housing support. The most important measure of this period was the guaranteed minimum income. Greece was one of the last EU countries to introduce a general (quasi-universal) minimum income support scheme. Article 235 of Law 4389/2016 established a 'social solidarity income' as a pilot project in several regions. Shortly afterwards, Law 4549/2018 extended the new scheme to the whole territory in accordance with the recommendations of international organizations, in particular the EU, ILO and OECD. The percentage of the population at risk of poverty after social transfers was 20.1% in 2010, increased to 21.4% in 2015, but then declined to 17.9% (2019) and 17.7% (2020), with a significant increase up to 19.6% in 2021 and a slight decline to 18.8% in 2022.[25] In the period 2019-2022, the most important measures were the following:

5.1. Housing Assistance Allowance for Uninsured Elderly Persons

The housing allowance covers uninsured elderly persons over 67 years of age who live in rented accommodation (Articles 24 to 30 of Law 4576/2020)[26]. Their annual income should not exceed EUR 4,320, or EUR 8,640 for a married couple. The pension for uninsured elderly persons and/or non-contributory disability allowances do not prevent the granting of the assistance. The applicant has to have been legally and permanently resident in Greece for the

[25] See, ELSTAT, Poverty Risk Household Income and Living Conditions Survey, year 2022 – reference period of income 2021, p. 3.

[26] 'Measures to support workers and vulnerable social groups, social security regulations and provisions for the support of the unemployed", Government Gazette A 235, 26.11.2020.

last 12 years prior to the application. The maximum monthly amount of the assistance is EUR 362.

5.2. Personal Assistant for Persons with Disabilities

Article 36 of Law 4837/2021 introduced the service of a 'personal assistant for disabled persons' for the years 2022 and 2023 in selected geographical areas of the country and for a limited period of time. The program, once evaluated, is expected to be extended throughout the country. The beneficiaries, i.e. persons with disabilities aged 18-65 years, are selected by multidisciplinary committees based on income and social criteria, mainly related to the type of disability, age group, gender, employment or non-employment status, household composition and living area. 'Personal assistants' are compensated for the services they provide by OPEKA and have to be registered in a register kept by the General Secretariat for Solidarity and Combating Poverty.

5.3. Allowance for Residents in Mountainous and Disadvantaged Areas

Article 27 of Law 3016/2022 provides for an allowance for Greek citizens or European citizens or citizens of the EEA or Switzerland who have resided for at least two years (based on their tax return) in mountainous or disadvantaged and less developed areas and have an annual family income below the amount specified in the law. Family income does not include the guaranteed minimum income, child benefit, education or vocational training allowance for unemployed persons and welfare benefits for the disabled. For 2022, the annual family income was set at EUR 4,700. A mountainous area is defined as an area that meets the criteria in Article 3 §3 of Directive 75/268/EEC, as amended. A less developed area is defined in Regulation (EU) 1305/2013 and the Annexes of the Rural Development Program of Greece. For the year 2022, the amount of the allowance for residents in mountainous and disadvantaged areas is EUR 600 if the family income does not exceed EUR 3,000; and EUR 300 if the family income ranges from EUR 3,001 to EUR 4,700.

5.4. Addressing In-Work Poverty

The problem of in-work poverty has been addressed by an important minimum wage increase as of May 2022. However, this increase does not seem to cover the increase in consumer goods prices observed after the start of the Russia-Ukraine war (24 February 2022).

5.5. Re-Organization of Social Welfare Institutions

With the purpose of creating a more unified and effective institutional framework for welfare, Law 4520/2018[27] established the 'Social Solidarity Welfare Benefits Organization (OPEKA)'. The mission of OPEKA is: a) to grant welfare benefits, allowances, financial aid, social services, financed out of the state budget, for the financial support and social integration of families

[27] Government Gazette A 30, 22.2.2018.

and vulnerable groups of the population;[28] b) to implement, execute and manage the programs, actions and activities relating to welfare policies of the Ministry of Social Welfare; c) to provide benefits and services of a social, educational, cultural and recreational nature from the 'Rural Home Account' of Law 3050/2002. In 2022, OPEKA granted, according to its website, the envisaged ten welfare benefits to about 163.000 beneficiaries, and the guaranteed minimum income to 273,000 vulnerable households.

In 2022, the 'Organization for the Employment of Manpower (OAED)' was renamed 'Public Employment Service (DYPA)' by Article 3(1) of Law 4921/2022[29]. DYPA covers the risk

[28] The OPEKA grants and administers the following allowances:
a) the child benefit of Article 214 of Law 4512/2018,
b) the Social Solidarity Benefit to uninsured elderly persons of Article 93 of Law 4387/2016,
c) the benefit to uninsured seniors, the granting of insurance capacity and funeral expenses in case of death of the above persons, in accordance with Law 1296/1982, Law 4093/2012, par. 7 of Article 93 of Law 4387/2016 and Article 49 paragraph 7 of Law 4520/2018,
d) the benefits and services of the Agricultural Home Affairs Account, in accordance with Law 3050/2002,
e) the following welfare benefits in cash to persons with disabilities:
(aa) mobility allowance to paraplegics, quadriplegics and amputees [(Law 57/1973, Law 162/1973, Article 22 of Law 2646/1998, Article 4 of Law 2345/1995,
(bb) food allowance to kidney, lung and bone marrow transplant patients, as well as to foreign and homogeneous kidney, heart and liver transplant patients, [Law No 421/1937, Article 22 of Law 2646/1998],
(cc) financial assistance to severely disabled persons (Law 57/1973, Law 162/1973, Article 22 of Law 2646/1998),
(dd) financial assistance to persons with severe mental retardation (Law 57/1973, Law 162/1973, Article 22 of Law 2646/1998),
(ee) financial assistance to paraplegics, quadriplegics and amputees who are uninsured and insured by the State (Law 162/1973, Article 3 of Law 1284/1982, Article 22 of Law 2646/1998, Decision 115750/3006/10.9.1981 of the Ministers of Finance and Social Services (B 572)),
(ff) aid for persons with congenital haemolyticanaemia (thalassemia - sickle-cell - microdrenocytic, etc.) or congenital haemophilia (haemophilia, etc.), Acquired Immunodeficiency Syndrome (AIDS) (Law 57/1973, Law 162/1973, Article 22 of Law 2646/1998),
(gg) financial aid for the deaf and hard of hearing (Law 57/1973, Law 162/1973, Article 22 of Law 2646/1998),
(hh) financial assistance to visually impaired persons (Articles 1 and 2 of Law 1904/195, Law 57/1973, Law 162/1973, Law 958/1979, Article 22 of Law 2646/1998, Article 8 of Law 4331/2015,
(ii) financial support for persons with cerebral palsy (Law 57/1973, Law 162/1973, Article 22 of Law 2646/1998),
(jj) income support for sick and recovered persons with cerebral palsy and members of their families (Law 57/1973, Law 162/1973, Article 7 of Law 1137/1981, Article 22 of Law 2646/1998),
(f) welfare benefits, financial and income support and social services for the financial support - assistance to special and vulnerable groups, in particular:
(aa) the Housing Assistance Allowance to uninsured elderly persons [Law 162/1973, Article 22 of Law 2646/1998, Decree of the Ministers of Finance and Health, Welfare and Social Insurance C3/2435/1987 (B 435)],
(bb) income support for families in mountainous disadvantaged areas (Article 27 of Law 3016/2002, Article 22 of Law 2646/1998),
(cc) the Multi-Children's Travel Card (Article 10 of Law 2963/2001, Article 17(10) of Law 3534/2007),
g) the guaranteed minimum income [Article 235 of Law 4389/2016, as amended by Article 22 of Law 4445/2016] initially called Social Solidarity Allowance.
h) welfare policy programs and actions of the Ministry of Social Welfare assigned to it under Article 116 of Law 4488/2017,
i) the granting of insurance capacity to monks and nuns who are registered in the monastic registers of Holy Monasteries or Metropolises of Greece, who reside in the Holy Monasteries or their annexes and are not retired by a domestic, except OPEKA, or foreign body. This right is also granted to Greeks of Greek origin, clergy and monks of the Patriarchates of the Eastern Orthodox Church, as well as monks of the Holy Monastery of Sinai,
j) Any other benefit provided for by law.
[29] Government Gazette A 75, 18.4.2022.

of unemployment and maternity risks. Its social services are part of the policy of supporting employment, addressing social risks with the welfare technique, for example benefits for the long-term unemployed, etc.

6. HEALTH CARE SYSTEM

The statistics show that in the period 2019-2022 the number of doctors per 100,000 inhabitants has increased, the number of beds has decreased, the number of hospitals has slightly decreased, the number of public hospitals is relatively stable, the number of private hospitals has slightly decreased, the number of health centers and primary health care units from 2020 shows a significant increase and the number of pharmacies has also increased.[30]

	2010	2015	2019	2020	2021
Physicians	5.7	5.9	6.2	64	
Beds	445	426	418	422.6	
Hospitals	2.7 (2012)	2.6	2.5	2.5	2.5
Health Care Units of Legal Entities of Public Law	1.2 (2012)	1.1	1.1	1.1	1.1
Health Care Units of Legal Entities of Private Law	1.5 (2012)	1.5	1.4	1.4	1.3
Health Centres (Primary Health Care)	1.9 (2012)	1.9	1.9	2.9	2.9
Pharmacies	95 (2012)	96.3	96.3	97.5	97.4

(Numbers per 100,000 inhabitants)

Greece has significantly improved the efficiency of its healthcare system in recent years, focusing on the reorganization of primary healthcare so that the whole population has access to local, public, non-discriminatory health services. However, the healthcare system is still hospital-centric, and curative care is provided rather in hospital than in ambulatory care.

The current and ongoing reform process is aimed at strengthening primary healthcare, based on a strategy covering infrastructure, equipment and organizational restructuring. The purpose of the new system is to give family doctors a central role in shaping the care pathway through referrals (gate-keeping), and to provide quality primary care services at the

[30] See Hellenic Statistic Authority (ELSTAT), Living Conditions in Greece, 5.5.2023, p. 79.

community level. At the end of 2021, 127 Local Health Units (TOMYs) operating with multidisciplinary teams (Article 106 of Law 4461/2017) were in place.

Each TOMY has a reference population of 10,000 on average, depending on population or geographical characteristics. The existence of family doctors, nurses, health assistants and social workers is essential for their functioning. The family doctor attends about 2,000 people. He/she is responsible for vaccination, preventive check-ups, periodic 'check-ups', health education, monitoring of chronic diseases and, of course, referral to other levels of the system.

In May 2022, Law 4931/2022 concerning the 'Doctor for all, equal and quality access to the services of the National Health Service and Primary Health Care and other emergency provisions'[31] was adopted. The changes introduced are not in name only (from 'family doctors' to 'personal doctors'), but should ensure equal access to healthcare for all citizens through a personal/family doctor, effective gatekeeping via a referral system that will relieve hospitals from unnecessary patient visits, and provide incentives for doctors to enroll citizens in the new Primary Health Care system. Based on the new regulations, the personal doctor can be a) a doctor of a Health Centre, Local Health Unit (TOMY) or any other public health care structure; b) a family doctor who already provides his/her services in the context of the operation of Local Health Teams as provided by Law 4461/2017; c) a doctor contracted with EOPYY; d) a private doctor.

The personal doctor is the person to whom citizens can go to get prescriptions for medicines, instructions, and, at the preventive level, a referral for tests or hospitalization when needed. All services are free of charge for citizens.

Already, the relevant network has been set up and citizens can freely choose among the doctors participating as personal doctors. The choice is without geographical limitation; registration is done through a platform and citizens can also register themselves. Registration for minors will start at a later stage. Until then, the needs of infants, children and adolescents will be covered free of charge by the available pediatricians of public primary health care facilities as well as those contracted with EOPYY and at the parents' expense by private pediatricians.

If there are no available doctors in a region, the choice will necessarily involve doctors from another region. In this case, the doctors are contacted and consulted by means of modern technology.

A digital platform has been completed and is in operation for the selection of one's personal physician, for electronic appointments, for prescriptions and for the medical record. The population has access to the above data and services using codes that ensure the protection of their personal health data. Digitalization has already made the primary health care system accessible to every citizen. At the same time, it allows the competent supervisory authorities to monitor the quality of care and health expenditure.

[31] Government Gazette A 94, 13.5.2022.

7. INTERNATIONAL SOCIAL SECURITY AGREEMENTS

In the past years, Greece concluded three bilateral social security agreements:

The Social Security Agreement with Serbia (Law 4645/2020)[32], adopted on 13 July 2017, entered into force on 3 July 2018. It has been accompanied by an administrative agreement to implement provisions which deal with old-age pensions, disability and survivors' benefits, procedures, data protection and administrative cooperation.

The Social Security Agreement with Egypt (Law 4698/2020)[33] was signed on 10 October 2018 and entered into force on 1 September 2021. This agreement replaces the 1985 Social Security Agreement between the two countries.

The Social Security Agreement with Moldova (Law 4966/2022)[34] was signed on 8 September 2021 and entered into force on 5 September 2022. Pursuant to the Agreement, each contracting state will pay the part of pension calculated proportionally to the contributory period recorded in this state.

8. CONCLUDING REMARKS

The period of the 'Memoranda', despite the criticality of the situation, can be considered to have been an opportunity to reorganize the social insurance system, to clarify the general principles of supra-legislative force and the limits imposed on the legislator and the regulatory administration when adopting measures, particularly restrictive ones. The challenge in the 2019-2022 period was to implement the reforms and deepen them further, in view of the fact that many regulations were annulled by the courts and needed significant adjustments.

The Greek system, which in the past had a very limited impact on reducing the percentage of the population experiencing poverty, has improved. However, its impact in reducing poverty remains limited, although the guaranteed minimum income has been introduced. On the other hand, the country allocates a sufficient percentage of GDP to social protection compared to the average of EU Member States. Clearly, the issue is not only the amount of resources allocated. It is the way in which they are distributed between the social protection sectors (social security, health and welfare benefits) and the (in)effectiveness of administrative organization and action. Efficiency in the welfare sector mainly requires changes in the institutional framework, changes in administrative organization and changes in perceptions. Priority in the allocation of resources should be given to health and social

[32] Government Gazette A 92, 7.5.2020.
[33] Government Gazette A 122, 22.6.2020.
[34] Government Gazette A 166, 5.9.2022.

welfare, while social insurance, which is financed mainly through contributions, and especially pensions, should receive a smaller share.

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Prof. Patrina Paparrigopoulou
Law School
National and Kapodistrian University of Athens
Greece