



Revealing the Unseen

Migrant Workers

A joint research study
by SolidarityNow and
Generation 2.0 for Rights,
Equality & Diversity



Generation 2.0
For Rights Equality & Diversity



This is our common ground

This survey is implemented in the framework of the project “Revealing the Unseen Vulnerable Migrant Workers,” with the support of PICUM and funded by the Robert Bosch Stiftung.

Authors:

Generation 2.0 RED | **SolidarityNow**
www.g2red.org | www.solidaritynow.org

Survey report and proofread:

From Generation 2.0 RED: **Katerina Kapnisi and Vera Karanika**

From SolidarityNow: **Georgia Spyropoulou and Nafsika Wagger**

Survey design:

Generation 2.0 RED, SolidarityNow

Data Analysis:

Nafsika Wagger

Enumerators:

Abdul Matin Akbar Zada, Aristeia Gani, Asif Faiaz, Chasan Kasem, Dimitris Khan, Jerry Bah, Margaryta Aradzhyoni, Maritina Dimitreli, Myroslava Klius, Nese Isler, Zakelin Chatzikyriakou, Niki-Vanesa Evbuomwan, Stefania Kosta

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1.

About Revealing the Unseen

The “Revealing the Unseen Vulnerable Migrant Workers” project seeks to shed light on the precarious working conditions experienced by vulnerable migrant workers in Greece. It aims to document the extent of these challenges and raise awareness about labour migration and the rights of migrant workers.

The project includes the following activities:

- **Survey:** Conducting a survey, to gather evidence addressing the information gap on undeclared work and precarious work permits among Third Country Nationals (TCNs) in Greece.
- **Labour Rights Seminars:** Organise seminars for 240 TCNs providing an overview of the legislative framework governing the labour market. These sessions aim to equip participants with the knowledge and tools required to safeguard their labour rights, secure safe working conditions, and access available support mechanisms.
- **Awareness-Raising Activities:** Carrying out advocacy initiatives, a targeted social media campaign and the development of accurate and up-to-date informational materials to promote awareness and foster positive change.

The project is implemented jointly by Generation 2.0 for Rights, Equality and Diversity and SolidarityNow with the support from the PICUM-Platform for International Cooperation on Undocumented Migrants’ grant programme on labour rights and labour migration, funded by the Robert Bosch Stiftung.

Generation 2.0 RED is a non-profit organization of people from different backgrounds working together to promote equal participation in a multicultural society through community empowerment. By combining action and research, the organisation actively promotes human rights, equality and diversity, while combating racism, xenophobia and all forms of discrimination.

With over 15 years of experience, Generation 2.0 RED excels in social action, sociological and legal research, programme management and cultural events. The organisation participates and cooperates with the largest human rights networks in Greece and across Europe, advocating for the rights of vulnerable social groups, regardless of their origin, nationality, religion, gender or sexual orientation.

Generation 2.0 RED stems from the merger of Second Generation, which had been operating as an informal group since 2006, and the Institute for Rights, Equality & Diversity (i-RED), in December 2013. So far Generation 2.0 RED has campaigned for the right to Greek citizenship for the second generation which was accomplished in 2015, expanded its free daily legal and employability services, participated in festivals and organized a series of events and activities promoting human rights.

SolidarityNow (SN) is a Greek non-profit, humanitarian organization established in 2013, to respond to the needs of the most vulnerable and marginalized groups of our society. The organisation’s vision is “a world of solidarity, hope and tolerance, where people live in dignity and security” and its mission is: “to improve people’s lives and empower them to create a just and inclusive society”. SN has defined four programmatic priorities to guide its work for the period 2023-2025:

- a) Supporting inclusive education for all
- b) Catalyzing livelihoods opportunities
- c) Improving social protection and cohesion
- d) Enabling access to justice and the protection of human rights

SolidarityNow’s methodology is centred on empowering individuals to take control of their lives and become catalysts of change within their communities. SN’s programmes are inclusive, fostering collaboration among people from diverse backgrounds to tackle shared challenges. This approach promotes peer-to-peer support while addressing issues of racism and xenophobia.

At the heart of our interventions lie the Solidarity Centres in Athens (Athens Solidarity Centre - ASC) and Thessaloniki (Blue Refugee Centre - BRC), which operate with an open-door policy, ensuring that anyone in need can request support. Additionally, SolidarityNow has expertise in delivering services within refugee and asylum seeker camp settings, having implemented interventions in over 30 sites across Greece.

To date, SN has supported more than 350,000 beneficiaries, through a multitude of programs including the operation of service-provision centres, protection activities, integration initiatives, employability services, and inclusive education. Our commitment to adaptability ensures that we continue to evolve our efforts to meet the needs of the most vulnerable populations.

2.

Abstract

The “Revealing the Unseen” survey explores the prevalence and impact of undeclared and under-declared work among migrants and refugees in Greece. Conducted with a sample of 228 respondents from Athens and Thessaloniki, the study highlights significant challenges, including labour rights violations, vulnerabilities linked to precarious insecure legal statuses, and systemic barriers to formal employment.

Adopting a mixed-methods approach, the survey combined desk research, a tailored questionnaire, and data analysis. The participants, originating from 36 countries, were divided into two groups: those in declared or under-declared employment and those in undeclared jobs. To ensure inclusivity and accuracy, 11 multilingual enumerators conducted interviews in-person or via phone, capturing nuanced perspectives and lived experiences.

The survey findings reveal employment trends and challenges faced by migrants and refugees in Greece. Although **70% of respondents were formally employed**, many faced significant labour rights violations. Issues such as discrepancies in salary documentation, extended working shifts and unpaid overtime were widely documented, even among those with formal contracts. On the other hand, **30% of respondents were engaged in undeclared work**, predominantly in sectors like construction and domestic work. These individuals experienced **severe exploitation, including underpayment and exclusion from social benefits**. Labour rights violations were alarmingly prevalent, with almost 63% of participants reporting at least one instance of labour mistreatment. Common issues included non-payment of allowances, denial of sick leave, and inadequate or absent compensation for workplace injuries. Undocumented migrants and asylum seekers emerged as the most vulnerable. Undocumented migrants cannot work under a formal contract, while asylum seekers have the right to work two months after filing their asylum claim. Asylum seekers amount to 40% of the undeclared workers.

Several barriers to employment further compounded these challenges. Language barriers were identified as the most significant obstacle, affecting 45% of respondents. Other critical issues included unstable documentation processes, such as with issuing AMKA (social security numbers) (22%), and limited access to professional networks or job resources (41%). Single mothers and asylum seekers were particularly disadvantaged, often compelled to accept precarious or informal work arrangements due to their circumstances.

The impact on livelihoods was profound, with **labour rights violations affecting 40% of respondents**. Consequences included unpaid leave, difficulties in renewing residence permits, and restricted access to unemployment benefits. Many were deterred from addressing these violations, with 35% citing fears of job loss, limited awareness of reporting mechanisms, and language barriers as key deterrents.

These findings emphasize the urgent need for systemic reforms to combat exploitation, reduce employment barriers, and safeguard the rights of migrants and refugees in the Greek labour market. Key recommendations include strengthening labour inspections and enforcement mechanisms, streamlining and extending pathways to legal employment, designing tailored Greek language training programmes, and providing affordable housing solutions to reduce precarious living conditions. This study highlights the vulnerabilities experienced by migrants and refugees and underscores the necessity of targeted interventions to foster labour market inclusion and protect their rights.

3.

The Persistent challenge of unemployment in Greece

After enduring a prolonged financial crisis and the impact of the COVID-19 pandemic, Greece has seen a significant decline in unemployment rates, dropping to 12% in 2022 and 10% in 2023. Despite this progress, Greece continues to have one of the highest unemployment rates among European Union (EU) and Organisation for Economic Co-operation and Development (OECD) countries. Certain population groups remain disproportionately affected, struggling to integrate into the labour market. The Greek labour market also faces several persistent structural challenges. These include high levels of informal employment, disincentives to work stemming from an inefficient tax and benefit system, low overall skill levels, skill mismatches, reliance on seasonal work, an aging population.¹

In addition to persistently high overall unemployment, certain demographic groups face even greater challenges in accessing the labour market. Young people are particularly affected, with Greece recording the highest youth unemployment rate in the OECD in 2022 - 24.3% of individuals aged 15 to 29 were unable to find work. Older workers also encounter significant barriers to employment. Women face a marked employment gap, with their participation trailing that of men by 20 percentage points. Similarly, people with disabilities are disproportionately excluded from the workforce, with their employment rate during the period 2016-2019 falling 30 percentage points below that of individuals without disabilities.² Long-term unemployment remains a critical concern, with 63.1% of Greece's unemployed population in 2022 having been without work for 12 months or more—again, one of the highest rates among OECD countries.³

Compounding these challenges, Greece faces a shrinking and aging population, underscoring the urgent need to increase labour market participation among those who are able to work. Projections indicate that Greece's population will decrease by 13% between 2020 and 2050, marking one of the steepest declines among OECD countries.⁴ Simultaneously, the population is aging rapidly. In 1990, there were approximately five working-age individuals for every person over the age of 65 in Greece. Today, that ratio has dropped to about 2.8 and is expected to decline even further, reaching just 1.5 working-age individuals per person over 65.⁵

1. OECD (2024), Impact Evaluation of Training and Wage Subsidies for the Unemployed in Greece, Connecting People with Jobs, OECD Publishing, Paris, <https://doi.org/10.1787/4b908517-en>

2. Ibid.

3. OECD, Employment rate, available at: https://www.oecd-ilibrary.org/employment/employment-rate/indicator/english_1de68a9b-en

4. United Nations (2019), United Nations World Population Prospects.

5. OECD (2020), OECD Economic Surveys: Greece 2020, OECD Publishing, Paris, <https://doi.org/10.1787/b04b25de-en>

3.1

Policy recommendations

Informal employment constitutes a substantial component of the Greek economy, posing challenges such as reduced tax revenues and limited access to social insurance benefits for workers.⁶ Accurately estimating the size of the informal economy is inherently difficult, as these activities are not reported to authorities. However, evidence suggests that much of the informal labour market involves under-declared rather than entirely undeclared work.

According to a 2019 Eurobarometer survey, 59% of Greeks admitted to engaging in, or knowing persons who engage in, undeclared activities, significantly above the EU average (33%).⁷ The survey also found that 4% of respondents have carried out undeclared paid activities in the last 12 months either on their own account or for their employer (3% EU average). Moreover, according to the survey, 6% of respondents have been paid some of their income (for extra work, overtime hours, any extra income above the legal minimum wage, or bonuses) in cash by their employer, without declaring it to tax or social security authorities over the last 12 months

While Greek authorities have made efforts to address undeclared work in recent years, updated data on the scope of the informal economy is currently unavailable.⁸

According to a study⁹ by the General Confederation of Greek Workers, for the period 2015-2017, the profile of the 7,255 workers who declare themselves fully uninsured presents the following characteristics:

- 58% are men and 42% are women.
- 70% have Greek citizenship, 7% have EU citizenship, while 23% are third country nationals.

6. The OECD uses the term "informal employment" to describe the employment that has not yet been declared to any public authority (OECD 2004). More explicitly, the European Commission defines undeclared work as "any paid activities that are lawful as regards to their nature but not declared to public authorities, considering differences in the regulatory system of Member states (EC 1998). In Greece, irregular work is an umbrella term including "undeclared" and "under-declared" work #. "Under-declared" work refers to the illegal practice of employers regarding under-declared wages and in particular the practice of paying legally declared employees two wages: (a) official wages declared for tax, social security and labour law purposes and (b) additional undeclared pay received "under the table" or in an "envelope". Another variation of undeclared work in Greece is when companies employ a person, for example, on a 4-hour contract, but they work for 7-8 hours. "Undeclared" work refers to work that has not been declared in any way to the state, for tax, social security and/or labour law reasons. This includes unregistered employees without a contract working for a company or a household. This is often the case for workers that are also members of the family, private lessons teachers as well as manual labourers. Illegal activities are excluded from this typology under this research.

7. Special Eurobarometer No. 498 (Wave EB92.1, 2019), <https://europa.eu/eurobarometer/surveys/detail/2250>

8. IMF, Recent Trends of Informality in Greece: Evidence from Subnational Data, available at: <https://www.elibrary.imf.org/view/journals/018/2024/009/article-A001-en.xml>

9. NE/GSEE, Violations at the workplace, The Case of the Food Service and Tourism Sector, available at: https://www.poeet.gr/rapt/banners/banner_02%20.pdf

- 20.2% of undeclared workers are employed in the primary sector, 13.7% in the secondary sector and 66.1% in the service sector.
- 35.6% have a secondary school certificate, while 21.6% have an elementary school certificate.
- The profile of undeclared workers, as revealed by the research, seems to be mainly young workers between 25-40 years old, with 76% having an educational level equal to, or lower than, the completion of secondary education.

Undeclared work amounted to 15.9% of employed workers at the beginning of 2018, with 406,412 people employed without any insurance under EFKA. The lowest rates of undeclared work are identified around the third quarter of each year, while the highest rates are identified in the first quarter of each year. The data therefore confirm the seasonality of undeclared work, which could be explained by the fact that in periods of lower economic activity (such as the winter months) the incentives for employers and workers to work undeclared are more pronounced.

According to data from the Greek Labour Inspectorate¹⁰, between July and August 2023, 1,313 businesses were inspected, of which 583 (44.4%) were found to be in breach of labour law regulations. Of 10,359 workers inspected, 1,729 were affected by the following violations: undeclared (103 individuals), working over the legal hours (1,338 individuals), other violations (288 individuals). According to the data, catering and hotel sectors saw the highest percentages of undeclared work and unpaid overtime. According to the data, catering and hotel sectors are two of the main professional sectors with high percentages of undeclared work and unpaid overtime.

Migrants, both documented and undocumented, remain one of the population groups most affected by undeclared work in Greece¹¹. Currently approximately 700,000 migrants reside in the country with valid permits under the Greek Migration Code.¹² In addition, a recent study estimates that the number of undocumented migrants in Greece ranges between 100,000 and 200,000 as of 2017. This figure reflects a decline from earlier estimates in 2008, which placed the number between 172,000 and 209,000.¹³

3.2

Undocumented migration and undeclared work: A nexus of vulnerability and informality

Undocumented migration has long been a significant issue in Greece, stemming from its geographic position as a primary entry point into the European Union. The phenomenon gained prominence in the 1990s with migration movements from Albania and persisted over the decades, with fluctuating but consistent numbers of individuals entering the country without proper documentation. Estimating the scale of undocumented migrants in Greece is complex due to several methodological challenges and data limitations, including the hidden nature of such movements, frequent changes in migrants' legal status, and difficulties in tracking border entry and exit flows.

For undocumented migrants, life is marked by extreme precarity. Their ability to maintain control over their employment, finances, housing, personal security, and access to public services is significantly constrained. These vulnerabilities have profound impacts on their overall health and wellbeing. Many individuals experience severe mental health challenges stemming from traumatic events in their home countries, perilous migration journeys, and the ongoing instability of their living conditions in Greece. Women, in particular, face additional risks, with limited access to contraception, family planning, and prenatal care. Accessing healthcare services is further hindered by legal restrictions, a lack of knowledge about available resources, and fear of deportation, compounding the health inequalities faced by this population.¹⁴

Undeclared and under-declared work affects both documented and undocumented migrants. However, undocumented migrants face heightened vulnerabilities, as they lack access to adequate legal protection, job mobility, and the ability to engage in collective bargaining. Their precarious status, compounded by fear of deportation severely limits their capacity to report workplace abuse or seek justice, making them particularly susceptible to labour market exploitation.¹⁵

10. https://www.efsyn.gr/oikonomia/elliniki-oikonomia/407628_parabiazei-ergatiko-dikaio-444-ton-epiheiriseon

11. See for example: Fouskas T (2012), Immigrant 'Communities' and Labour Representation. Athens: Papazisis (in Greek), Gialis, S., Herod, A. and Myridis, M. (2014), 'Flexicurity, Informality, and Immigration: The Insufficiency of the Southern EU Framework, as Illustrated through the Case of Preveza, Greece', Journal of Modern Greek Studies, 32(1), 25-53.

12. Ministry of Migration and Asylum, Infosheet August 2024, Available at: <https://tinyurl.com/2rj4p7ey>.

13. The Irregular Migrant Population of Europe MirreM Working Paper No. 11/2024, Available at: <https://irregularmigration.eu/wp-content/uploads/2024/10/MIRREM-Kierans-and-Vargas-Silva-2024-Irregular-Migrant-Population-in-Europe-v1.pdf>

14. PICUM, Migration status: A key structural social determinant of health inequalities for undocumented migrants, 2023, available at: https://picum.org/wp-content/uploads/2023/12/Migration-status_A-key-structural-social-determinant-of-health-inequalities-for-undocumented-migrants_EN.pdf

15. PICUM, Designing labour migration policies to promote decent work. Available at: <https://picum.org/wp-content/uploads/2021/03/Designing-labour-migration-policies-to-promote-decent-work-EN.pdf>

3.3

Regularisations in Greece: A fragmented effort

To address the issue of undocumented migration, Greece has implemented several regularisation programmes over the years. The first major programme occurred in 1998, conducted in two phases, during which approximately 370,000 applications were submitted in the first phase, and 212,000 in the second. This was followed by a second programme in 2001, attracting 362,000 applicants. A third effort took place in 2005-2006, during which approximately 200,000 individuals applied.¹⁶

While these programmes had a notable impact by granting legal status to thousands of migrants, their overall effectiveness was limited. Many beneficiaries fell back into undocumented status due to the temporary nature of the permits issued and the often complex and restrictive renewal processes. Moreover, those who did not qualify for these programmes, or who arrived after the specified cutoff dates, were left without legal protection, perpetuating their undocumented status.¹⁷ Since the last regularisation programme concluded in 2007, Greece refrained from initiating new efforts until 2023, leaving a significant gap in addressing the ongoing challenges faced by undocumented migrants.

In 2023, the Greek government introduced a temporary regularisation programme under Law 5078/2023. Article 193 of Law 5078/2023¹⁸ establishes a pathway for third-country nationals without legal documentation who have resided in Greece before November 30th, 2023, can demonstrate at least three years of continuous residence before submitting their application. This provision enables eligible individuals to apply for a residence permit, granting them the right to work or provide services. Applicants must meet specific criteria, including proof of continuous residence, a valid passport (even if expired), and a job offer. They must pay a fee of €300 and a small administrative cost of €16. Eligibility is contingent on maintaining a clean record concerning public safety and order. The programme also extends provisions for family reunification. If the applicant secures a permit under Article 193, their spouse and minor children may also qualify, provided the family includes at least one minor child and all family members were already residing in Greece before November 30th, 2023.

The application window for this temporary regularisation programme remains open until

December 31st, 2024, and successful applicants will receive a three-year residence permit. The process is designed to offer a structured path for migrants already in Greece, allowing them to work legally and integrate more effectively into the labour market. As of August 2024, 28,919 applications have been submitted, with 17,603 applicants granted temporary certificates pending the finalisation of their residence permits.¹⁹ This initiative was introduced by the Greek government as a strategic response to persistent labour shortages in critical sectors such as agriculture, construction, and tourism. These industries, which are vital for Greece's economy, have faced ongoing challenges in meeting the demand for low- and medium-skilled workers.²⁰

Greece employs a dual strategy to manage labour migration: bilateral agreements with specific countries and the process known as "metaklisi", which invites specific third-country nationals for employment. These approaches aim to address labour shortages in sectors where domestic workers are insufficient.²¹ In recent years, the Greek government has established bilateral agreements with Bangladesh and Egypt to attract foreign workers, with plans to negotiate additional agreements.²² Under the current framework, Bangladeshi nationals residing in Greece before February 9th 2022, and employed at that time, can apply for a five-year seasonal work permit. The permit requires them to return to Bangladesh for three months annually. In 2023, 3,405 applicants were approved, while 5,900 remained pending as of February 2024 and 1,009 were rejected.

Introduced in 2011, the residence permit on exceptional grounds provides an additional pathway to regularisation in Greece.²³ This permit grants third-country nationals the right to access the labour market if they meet specific criteria. Eligibility requires either continuous residence in Greece for at least seven years before applying substantiated by certified documentation or being a parent of a minor Greek citizen with evidence verifying the parental relationship. This permit is granted once and is valid for three years. Upon expiration, the holder may apply to transition to a different residence permit category. Although an important pathway to regularisation for undocumented migrants, it has notable limitations. It does not facilitate family reunification, and the time spent in Greece as an applicant for international protection is excluded from the required seven-year residence period. Currently, Greece invites workers through three distinct labour categories: highly

19. Ministry of Migration and Asylum, Statistics for August 2024, available at: <https://shorturl.at/4J4FV>

20. APnews, Greece is planning a major regularisation programme for migrants to cope with labour crunch, Available at: <https://apnews.com/article/greece-migration-labor-economy-ace2e3faac525e58e2eb7151b08b8ff9>

21. Greece has signed several bilateral labour agreements with neighbouring countries to address labour shortages, particularly in agriculture and fisheries. Notably, agreements were established in the 1990s with Albania (1997), Bulgaria, and Egypt. These agreements primarily focused on seasonal workers who were granted temporary residence and work permits to fulfill the demands of Greek employers. The agreement with Albania, which remains active, allowed the seasonal movement of agricultural workers, a key aspect of Greece's labour strategy. Similarly, the agreement with Egypt initially catered to the fisheries sector, later expanding to allow for the mutual transfer of social security rights.

22. Regularisation of undocumented migrants or temporary bilateral agreements with third countries? Which do Greeks prefer? available at: <https://www.eliamep.gr/wp-content/uploads/2024/03/Working-Paper-126-EL-.pdf>

23. Newest version as in force since 01/01/2024, the date of entry into force of the new immigration code (Article 134 paragraph 5 Law 5038/2023)

16. Baldwin-Edwards, M. (2014). "Regularisations and Employment in Greece." Migration Policy Centre, European University Institute.

17. Ibid.

18. Law 5078/2023 (OG. A 211/20.12.23), Reform of occupational insurance, rationalisation of insurance legislation, pension arrangements, system of appointment and recruitment of teachers of the Public Employment Service and other provisions.

skilled (via the EU Blue Card), dependent labour (skilled and unskilled), and seasonal work (up to six months).

According to the Hellenic Ministry of Labour, the total quota for residence visas for third-country nationals for 2023-2024 was set at 167,925. In April 2023, a new Ministerial Decision added 32,517 positions, although this fell short of the 380,000 requested by regional employers. For example, the tourism sector noted an increase in foreign worker quotas, from 2,811 to 9,261, but this was still far below the 80,316 positions requested by employers. The Ministry aims to prioritise domestic labour by filling positions through the unemployment registry, targeting foreign worker quotas only in sectors with no local interest.²⁴

3.4

Data on migrant labour: A tale of decline

Based on the most recent census (2021), Greece's migrant population has dropped by 16.1% compared to 2011, now estimated at 765,000 individuals.²⁵ Between 2011 and 2023, the number of foreign citizens employed in the Greek labour market dramatically declined. Data indicate a 55% reduction in employed migrants, decreasing from 375,000 to 170,000 over this period. The sharpest decline occurred between 2011 and 2013, with a drop of 120,000 foreign workers, coinciding with the peak unemployment rate for foreigners, which reached 40% in 2013.

While there were slight recoveries in employment in 2014 and 2019, the employment of foreign nationals has continued to decline across nearly all sectors. The secondary sector (e.g., manufacturing and construction) was hit the hardest, with a nearly 60% decrease in foreign employees, dropping from 125,000 in 2011 to just 51,000 in 2023. Similarly, the tertiary sector (services) saw a 55% reduction, from 214,000 workers to 97,000. In the primary sector (agriculture and related industries), the decline was smaller but still significant, with employment down by 40%, now estimated at 21,500 workers.²⁶

In the EU, migration continues to be a highly politicised issue, with Member States striving to strike a balance between enforcing strict measures to deter undocumented migration and creating opportunities for documented/declared labour migration. In recent years, the

European Union has made efforts to address the demand for labour migration. As outlined in the new Pact on Migration and Asylum, the EU Framework for Talent Partnerships is designed as a policy instrument to help Member States capitalise on international mobility and align their labour market needs with the skills of foreign workers. The European Commission has identified seven priority-partner countries for this framework: Bangladesh, Egypt, Morocco, Nigeria, Senegal, Tunisia, and Pakistan.

In December 2023, the European Commission introduced the "Skills and Talent Mobility Package" to address labour shortages. This initiative focuses on integrating various groups, including older individuals, people with disabilities, migrants, women, and young people not in education or employment, through upskilling and improving working conditions. A key component is the creation of an "EU Talent Pool" platform aimed at connecting EU employers with jobseekers from non-EU countries.

The key EU regulations regarding labour migration from non-EU countries are outlined below:²⁷

- The updated Blue Card Directive, effective from November 2023, aims to ease the process for hiring highly skilled workers from third countries within the EU.²⁸
- The Single Permit Directive, adopted in 2011 and recently recast in April 2024, establishes a simplified application procedure and one single permit for both the right to work and stay in the EU.²⁹
- The 2003 Long-Term Residents Directive enables Member States to grant long-term resident status and associated rights to non-EU nationals who have lived with documentation and continuously within an EU country for five years, provided they meet additional criteria. As with the Single Permit Directive, the European Commission proposed a revision in 2022, but the process remains incomplete.³⁰

27. European Commission, Legal Migration and Integration, https://home-affairs.ec.europa.eu/policies/migration-and-asylum/legal-migration-and-integration_en

28. Directive (EU) 2021/1883 of the European Parliament and of the Council of 20 October 2021 on the conditions of entry and residence of third-country nationals for the purpose of highly qualified employment, and repealing Council Directive 2009/50/EC, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32021L1883>

29. Directive (EU) 2024/1233 of the European Parliament and of the Council of 24 April 2024 on a single application procedure for a single permit for third-country nationals to reside and work in the territory of a Member State and on a common set of rights for third-country workers legally residing in a Member State (recast), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ%3AL_202401233

30. Council Directive 2003/109/EC of 25 November 2003 concerning the status of third-country nationals who are long-term residents, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02003L0109-20110520>

24. Ministry of Labour and Social Security, Available at: <https://ypergasias.gov.gr/ergasiakes-scheseis/atomikes-ergasiakes-sxeseis/ergasia-politon-triton-choron-stin-ellada/>

25. ELSTAT, 2021, See: https://www.statistics.gr/documents/20181/17529706/GreeceInFigures_2021Q4_EN.pdf/b8823f93-b98e-0535-8f3b-df0aa863dfd6

26. Dianeosis, Tramountanis, A., [https://www.dianeosis.org/wp-content/uploads/2024/09/Im\)migration_policies_upd230924.pdf](https://www.dianeosis.org/wp-content/uploads/2024/09/Im)migration_policies_upd230924.pdf)

4.

Revealing unseen employment patterns of migrant and refugee population: Survey Findings

4.1

Methodology

Building on the evidence collected through multiple data resources combined with our experience working with migrants and refugees, as well as previous research on the factors that influence the integration of migrants and refugees into the national labour market, SolidarityNow and Generation 2.0 RED designed a survey as part of the “Revealing the Unseen Vulnerable Migrant Workers” project. This survey is one of the components of the project, which aims to collect evidence on the issue of “undeclared” or “under-declared” employment («αδήλωτη» ή «υποδηλωμένη» εργασία) within 2023-2024 among migrants and refugees in Greece to support relevant advocacy actions aiming for the improvement of living conditions of individuals affected by these practices.

Information was collected using both qualitative and quantitative methods from January to April 2024. Initially, desk research and a literature review were conducted regarding un/under-declared work in various labour market sectors. This was followed by a partners’ meeting to ensure all professionals had a common understanding of the issue. These activities led to the development of a questionnaire that examined four categories of questions, including both closed and open-ended questions:

1. **Demographics**, including information about gender, age, nationality, legal and marital status, as well as the educational and professional background of respondents.
2. **Working conditions**, including questions about occupation, formal and/or informal working conditions, salary-wage payment, working days and hours, and ways of payment.
3. **Labour rights violations**, including positive phrases about the formal conditions of employment such as “I have a contract since the beginning” for those working in declared job positions and for the group with undeclared work, “Working without a contract was my choice.”

4. Impact of violations and coping strategies, including questions about ways people cope with the violation of their work rights and their reasoning beyond that, as well as the consequences that these have on their everyday lives.

The participants were separated into two groups of respondents. The first group is the group of people with declared and under-declared work (with formal contracts), acting as a control group. The second group of participants includes respondents holding undeclared job positions (without formal contracts).

Eleven (11) enumerators were assigned to conduct the survey (in person or by phone) to ensure that all participants felt comfortable sharing their personal experiences in their native language, hence Arabic, Farsi/Dari, Urdu/Pashto, French, Ukrainian, as well as in Greek and English. Therefore, the enumerators were selected according to their spoken language along with their experience in research initiatives.

The questionnaire was deployed using an online platform, Kobo Tool, which a) allows for multiple submissions either online or offline, b) permits synchronizations of data collected in one excel sheet, and c) facilitates data analysis.

The data analysis was conducted using SPSS statistical analysis programme to describe the characteristics of the respondents and identify possible correlations between variables.

This study offers a snapshot of the current reality, and its findings cannot be generalised to the broader population.

Study Limitations

Regarding the geographic focus of the study, the majority of respondents (nearly 90%) were based in Athens and Thessaloniki, where SolidarityNow and Generation 2.0 RED operate. The study thus provides limited insights into employment conditions in rural areas or on Greek islands. Key sectors such as agriculture and tourism, which employ a significant number of migrants and refugees, particularly in seasonal work, are underrepresented in the sample. The exclusion of these regions and sectors may overlook unique patterns of undeclared or under-declared work prevalent outside urban centres.

With 228 respondents, the study offers a detailed snapshot of specific migrant and refugee groups but does not represent the broader population of migrants and refugees in Greece. Smaller or less-visible subgroups, including certain undocumented migrants such as women in private domestic work, or migrants in remote regions, might not be adequately captured. The study sample mainly includes individuals with legal documentation, such as residence permits, and beneficiaries of international protection. Undocumented migrants, who are often the most vulnerable to exploitation, are underrepresented in the analysis. This could lead to a skewed understanding of the interplay between legal status and employment conditions. Data collection was carried out during 2024, which restricts

the study's ability to account for variations over time, especially seasonal fluctuations in employment. This is particularly relevant in sectors such as tourism and agriculture, where employment patterns vary significantly among seasons.

Broader systemic challenges, such as the inefficiency of Greece's labour inspection system, inadequate penalties for non-compliant employers, and weak enforcement of existing labour laws, were beyond the scope of this study. Additionally, challenges faced by employers stemming from structural factors shaping the labour market, were not addressed. These systemic issues, however, are pivotal to understanding the prevalence and persistence of undeclared work.

While the study offers valuable insights into the realities of undeclared and under-declared work among migrants and refugees in Greece, these limitations highlight the need for further research. Expanding the geographic and sectoral scope, incorporating longitudinal data collection, and delving deeper into systemic and intersectional challenges would significantly enhance the depth, comprehensiveness and impact of future studies.

4.2

Profile, employment status, working conditions, and barriers faced by the migrant and refugee populations.

The 228 survey respondents reveal several factors influencing their integration into the national labour market, whether engaged in declared or undeclared employment. Findings indicate that asylum seekers, people with limited professional experience in Greece as well as limited educational attainment are particularly vulnerable to being confined to undeclared job positions, making them more susceptible to exploitation compared to those in formal employment. Additionally, individuals employed in sectors characterised by significant labour shortages or precarious working conditions face heightened risk of exploitation. Even among those with formal contracts, the under-declaration of employment remains a prevalent issue, resulting in violations of labour rights.

Special attention is given to individuals in particularly vulnerable circumstances, such as those without documentation, individuals experiencing homelessness, or heads of single-parent households. These groups face compounded challenges in accessing secure and fair employment opportunities.

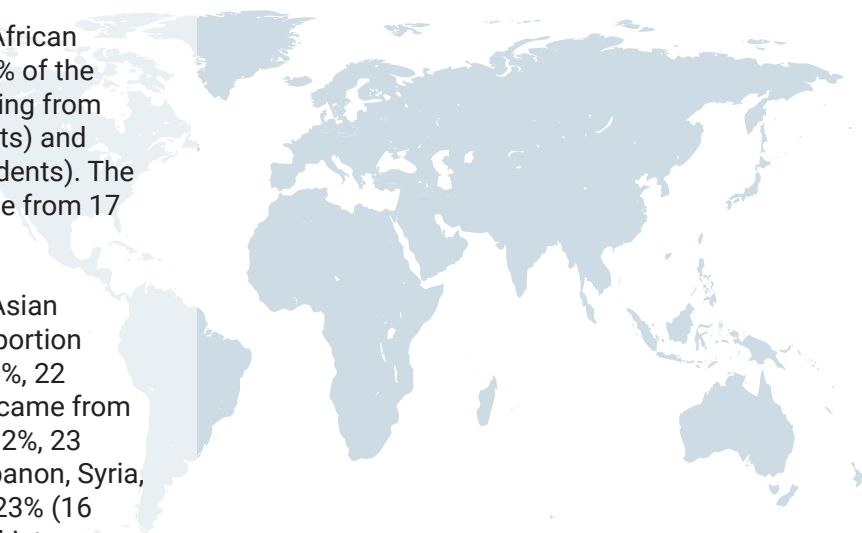
The analysis examines the group of "declared" workers (control group) separately from the "undeclared" employees; and where appropriate, possible correlations between variables are identified to strengthen the credibility of the results.

4.2.1

Profile of migrants and refugees

The 228 survey respondents represented a diverse range of backgrounds, originating from 36 countries across Africa, Asia, and Europe (excluding EU member states).

- Africa:** Respondents from African countries accounted for 38% of the total, with the majority coming from Nigeria (34%, 30 respondents) and Cameroon (12%, 10 respondents). The remaining participants came from 17 other African nations.
- Asia:** 31% originated from Asian countries. A significant proportion came from Afghanistan (31%, 22 respondents), while others came from Middle Eastern countries (32%, 23 respondents), including Lebanon, Syria, Iran, and Iraq. Additionally, 23% (16 respondents) were from Pakistan.
- Europe and Other Regions:** Participants from Europe and other non-EU countries constituted 31% of the total. The largest subgroup was from Albania (50%, 35 respondents), followed by Ukraine (43%, 30 respondents), Georgia and the Dominican Republic. This segment included a majority of female respondents.



- 38%**
Africa
- 31%**
Asia
- 31%**
Europe and Other Regions

Among respondents, 58% were male and 42% were female, with the majority falling between the ages of 19 and 39 (56%), followed by 23% aged 40-49. Notably, most female respondents were above 40 years old, whereas males were predominately younger, under the age of 39. (See Table 1) The age distribution in the sample reflects the high proportion of Albanian and Ukrainian women in the sample. According to the 2021 Census, the broader migrant population in Greece shows a similar trend, with 3.5% of migrant women originating from Ukraine, 3.1% from African countries, 2.5% from the Middle East, and 2% from other countries such as Pakistan, Afghanistan. Albania women represent the largest subgroup, accounting for 47.1% of all non-Greek women permanently residing in Greece.³¹

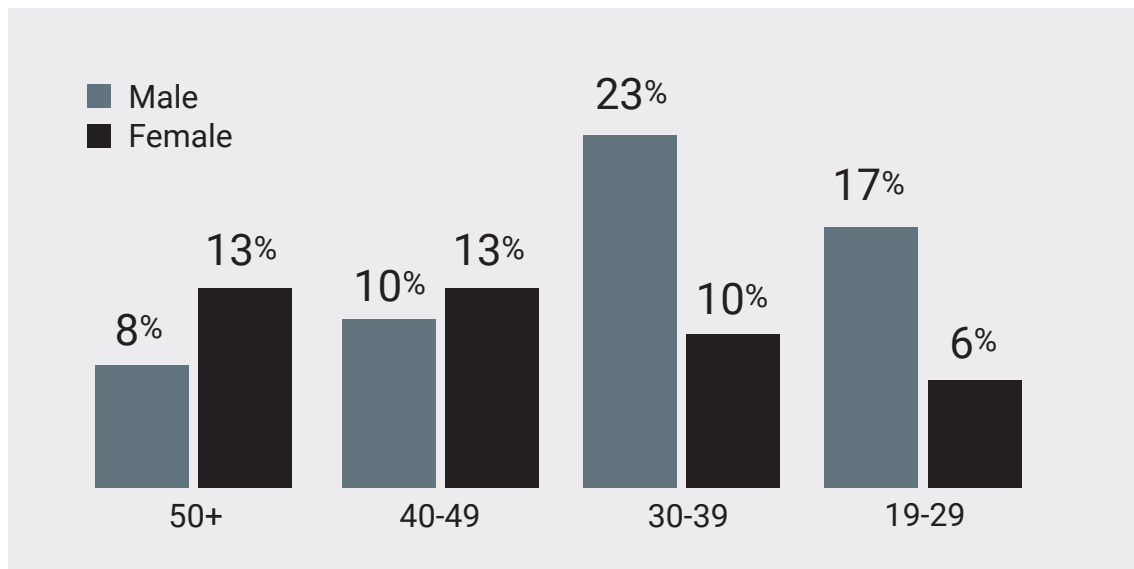


Table 1: Gender distribution of respondents per age cluster

Regarding legal status, the vast majority of participants (93%) were eligible to work in Greece. This group consisted of 38% residence permit holders, 33% were beneficiaries of international protection, and 22% asylum seekers. Only a small fraction (5%) of the respondents lacked legal documentation, while 2% were unaware of their legal status. However, contextual information highlights a concerning reality: most respondents face significant risk of losing their legal status. This vulnerability stems from the temporary nature of their residence permits or their status as individuals seeking international protection.

31. Hellenic Statistical Authority (EL.STAT 2021), Table A02: Census 2021. Available at: <https://www.statistics.gr/2021-census-res-pop-results>

Reflecting further on their profile, 47% of respondents have been residing in Greece for more than seven years, whereas 39% have been residing in Greece for up to four years, and 14% have been living in Greece between five and six years. From the respondents, 20% have completed primary education, 41% secondary education (junior and senior high school), and 39% tertiary education. Indicatively, 30% of respondents have completed the corresponding Greek obligatory education (primary and junior high school). Educational attainment was evenly distributed between male and female respondents, except at the primary education level, where the number of male respondents was double that of females.

Regarding living conditions, 66% live in a rented house, 8% were homeowners, 8% were hosted by friends or relatives. It is notable that 11% were hosted by others and were paying a fee for this, 4% were accommodated by the Ministry of Migration and Asylum, under the Helios project, or in an Open Accommodation Site (OAS), 2% were accommodated by their current employer and 1% declared to be homeless. Most lived without a partner (69%), either being single, widowed, divorced, or married with their spouse residing in another country. More than half of the respondents (56%) have more than one child under 18 years old in Greece. Significantly, 25% of those without a partner were single parents, with most of them (54%) being single mothers.

A significant subset of respondents requires special attention due to their objectively vulnerable conditions, which heighten their risk of exploitation in the labour market. In addition to the challenges posed by unstable housing conditions, notable findings include that 21% of respondents were over the age of 50, 22% had been in Greece for less than two years, and 5% lacked legal documentation.

Regarding livelihoods, although the majority sustain themselves through employment, they still require supplementary support from other sources. Specifically, despite 96% of the respondents covering their livelihoods through salaries, daily wages, or self-employment, 53% required supplementary support in terms of items or cash. This support came from friends and relatives, the Ministry of Migration and Asylum through the national cash programme (for asylum seekers), NGOs, social benefits, or by selling personal belongings or using savings.

Indicatively, at the time of the survey (January–April 2024), 70% of respondents were employed legally, holding formal work contracts, whilst 30% worked in job positions undeclared to formal authorities currently (73%) or in the past 12 months (27%). These are detailed in the following sections. (See Table 2)

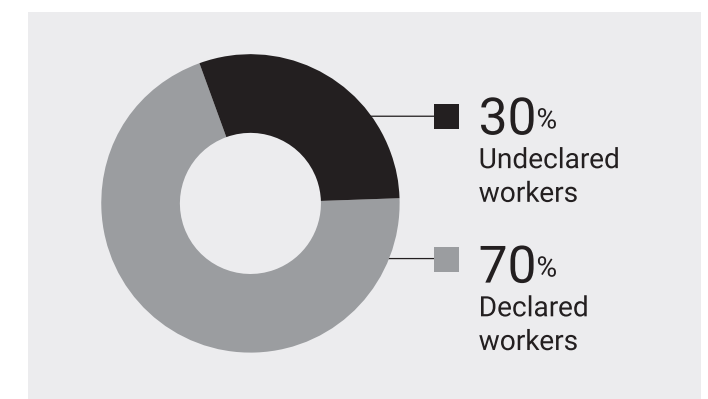
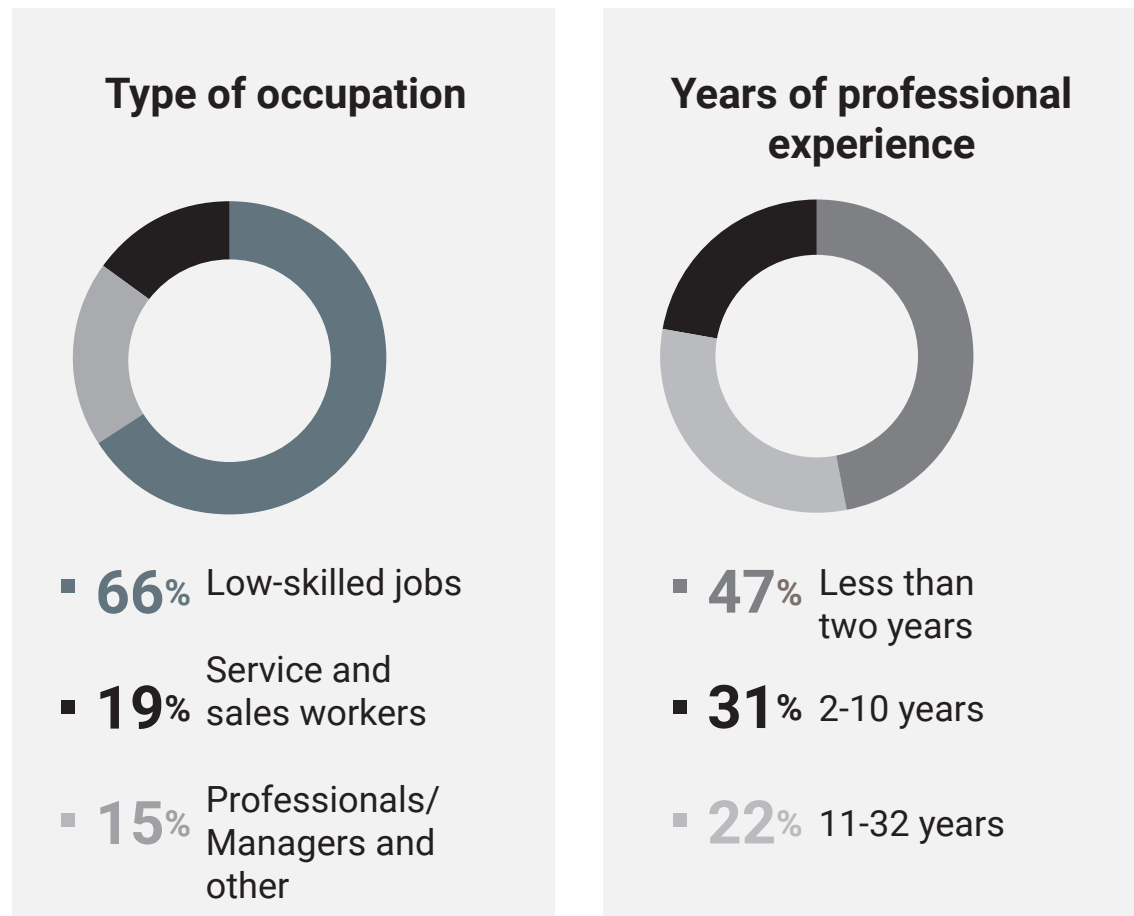


Table 2: Share of respondents working in declared and undeclared job positions

The respondents also addressed the barriers which they have encountered throughout the years while looking for work. The level of knowledge of the Greek language was identified as the most critical barrier (45%), followed by a lack of networks (41%). Other significant barriers were documentation issues (22%), including issues not only related to the volatility of their legal status but also issues related to documents that enable their access into the labour market, such as A.M.A., AMKA (tax and social security numbers). Additional barriers were related to family or child responsibilities (14%). Furthermore, a small number of individuals (15%) faced medical issues that prevented them from actively seeking employment, and a notable 6% experienced discriminatory behaviours. Conversely, only 14% reported having faced no difficulties in their job search.

Regarding the respondents' work experience, the majority (66%) have been employed in low-skilled positions across various sectors of the labour market, acquiring extensive professional experience in Greece.

Notably, 53% had between 2 and 32 years of professional experience in Greece, either employed currently or during the previous year. However, a significant share (47%) had less than two years of professional experience in Greece.



Regarding job sectors, remarkably, 26% of respondents have been employed in the tourism sector, 12% in construction, 10% in housing care and 11% in administrative and support services the most common job positions were in cleaning, dishwashing, housekeeping, construction etc. Additionally, 9% have worked in manufacturing, while 32% are spread across nine other sectors, including agriculture, forestry and fishing; transportation and storage; human health and social work; arts, entertainment and recreation; professional, scientific and technical activities; financial and insurance services; water supply, waste management; wholesale and retail trade, and other service-related activities.³²

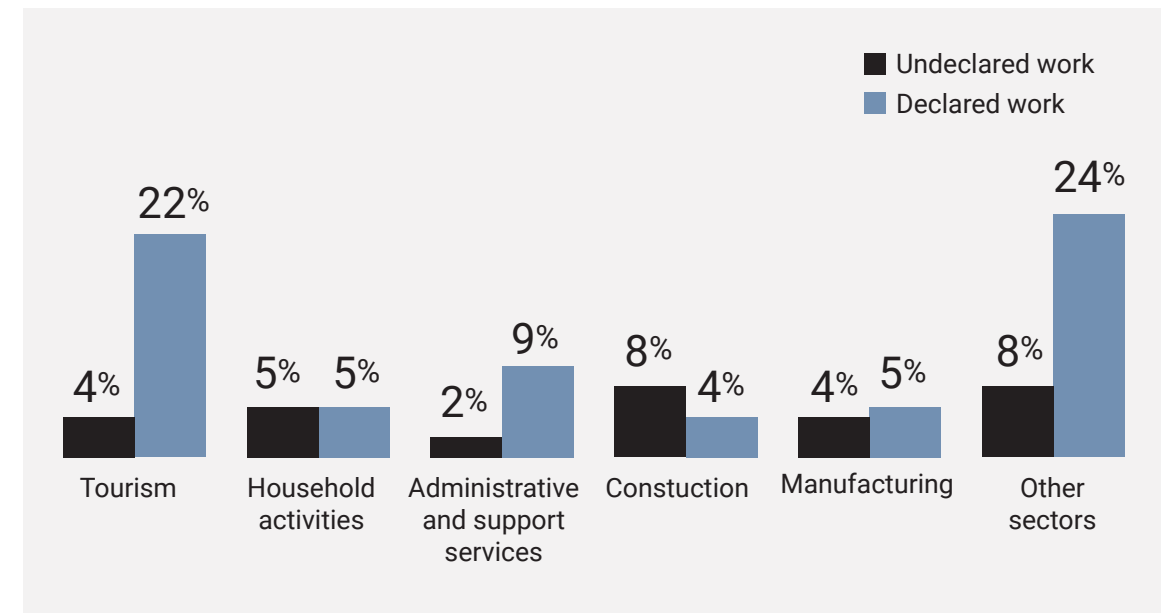


Table 3: Share of respondents employed in declared or undeclared jobs by labour market sector

Significant correlation was identified between the labour sector and undeclared work (See Table 3). The respondents employed in the construction and household activities sectors are more likely to be engaged in undeclared work ($\chi^2(5) = 28.531, p < 0.001$).

The participants responded on their experiences regarding working conditions, such as working hours and days as well as amount of payment. A significant subset reported working overtime both in declared and undeclared job positions. 80% of respondents worked 5 to 7 days per week. More than half (53%) were occupied according to the legal working hours (eight hours daily not exceeding forty hours per week, including overtime work). However, 23% (57 respondents) reported working more than nine hours per day (overtime), exceeding the legal working hours, with only a few (8 respondents) of them

32. The classification of occupations was realized according to the "International Standards Industrial Classification of All Economic activities" (ISIC, 2008), Rev. 4

working less than five days per week. Between them, two female respondents held in-house positions, working seven days per week for 12 and 24 hours per day, respectively.

Reflecting on the respondents' payment in relation to the working hours, 53% of respondents reported receiving a monthly salary of over €780 net, primarily employed in the tourism and household care sectors, whereas 47% earned less than €780. According to the Tourism & Hospitality Collective Agreement, "salaries set are higher than the national minimum salary (€815 - €1,017 gross)." However, 26% of respondents who worked more than 8 hours per day received less than €780 per month.

Thirty-one percent (31%) of the respondents were paid in daily wages, primarily working in the construction and tourism industry, with 65% of them earning more than €35 net per day, while 35% received less than €35 per day. Those respondents working in undeclared positions were receiving their payments mostly through daily/hourly wages or paid by piece, primarily employed in the agriculture, construction, or household care sectors.

Furthermore, employers provided additional support to 78 respondents, primarily employed in the tourism and household care sectors. Specifically, 26% of the respondents received meals, while 12% of respondents were provided with accommodation and transportation.

5.

Evaluating fairness and compliance in declared and undeclared work: Employment terms and practices

Drawing on the data collected through the survey and desk review, it becomes apparent that many migrants, asylum seekers, and refugees are employed in sectors facing significant labour shortages in low-skilled positions. These roles sometimes come with questionable working conditions, which hinders the successful integration of individuals into the workforce.

According to Triantafyllidou and Bartolini, the phenomenon of "irregular labour migration" can be associated with what Portes (1978) called the "structural determinants in both sending and receiving countries". Those determinants include the "demand for cheap, irregular labour in receiving countries coupled with the needs arising from increasing demographic and economic pressures of booming young populations in countries of origin. While there is a structural demand for migrant workers - of mostly low skill, low prestige, and low pay jobs- related legal migration policies do not cater for such demand. Restrictive policies somehow "generate" (De Genova 2004) illegal residence status and irregular work to the extent that they make it difficult for both migrants and their employers to regularise their situation, having to face two hurdles: migration legislation and labour law". Therefore, "there is a clear link between the restrictive labour migration and asylum-seeking policies in Europe and the presence of migrants with an insecure, temporary or indeed irregular status (Triantafyllou et al. 2019)".³³

This argument is particularly true for domestic work and agriculture in order to compress costs and increase profits (Jordan and Duvell 2002; Lewis et al. 2015; Kilkey and Urzi 2017; Palumbo and Sciarba 2018).

33. See for example: Triantafyllidou A., Spencer S., 2020, Migrants with Irregular Status in Europe, Publisher Springer Cham, Available at: <https://doi.org/10.1007/978-3-030-34324-8>

5.1

Declared work and labour rights violations

In the following section, we assess the level of legality of employment relations and explore potential violations of labour rights and how workers' personal characteristics influence them.

This section in the questionnaire uses positive statements for participants to examine possible violations of labour rights. The choice to use positive statements is intentional, ensuring that the results remain unbiased while simultaneously enhancing the credibility of the study. Each participant must respond "Yes", if s/he agrees, "No", if s/he disagrees with the statement, or "I don't know", in case s/he doesn't know about the situation in question. Individuals who were formally employed responded to different questions to individuals without formal employment.

The results show that 160 respondents out of 228 (70%) have signed formal employment contracts, and they are primarily employed in the tourism (31%) and administrative and support service activities (13%) sectors.

Significantly, 46% are female. It is important to note that asylum seekers are underrepresented in declared job positions (control group), covering only 14%, whereas most of the respondents are individuals under international protection (39%) or holders of residence permits (45%). Remarkably, individuals with minimum education up to primary school are also underrepresented in the control group (11%), with the majority having attained secondary (46%) and tertiary (43%) education. Additionally, more than half (52%) have been living in Greece for more than 7 years, followed by those being in Greece for 2-4 years (21%), less than 2 years (12%), and 5-6 years (12%). Moreover, 41% have less than two years of professional experience.

The results indicate that informal agreements may exist between some employees and employers, extending beyond the terms stated in their signed contracts. While 87% of respondents reported receiving their salary as agreed with their employer, only 62% indicated that their contracts accurately reflected the total payment they received. In line with this, 26% stated that their full payment amount was not clearly specified in their

employment contract, with the same percentage (26%) receiving payment through a combination of cash and bank transfers. 13% of respondents were paid exclusively in cash. Further highlighting these discrepancies, 26% of respondents reported working more than 8 hours per day while earning less than €780 per month. These findings suggest widespread violations of labour rights, particularly related to underdeclared employment. Notably, 81% of respondents had signed employment contracts from the beginning of their employment.

"It is very difficult to work in Greece because of the language barrier and legal documentation volatility. Also, the Greek employers don't like migrants! They always give you the most difficult things to do. You work a 12-hour shift, and the contract writes 8 hours falsely. The government should investigate it because most of the migrants are being exploited without being well paid. That's why people are going to other countries."

Male, 45 y/o employee from Nigeria

Additionally, responsibilities and working hours were reflected correctly in the employment contract for more than 55% of the participants. However, 17% were unaware of the responsibilities, while 12% did not know if the earnings are correctly reflected in their contract; indicatively, 35% were not aware if they were paid as much as Greek employees.

Among the 60 respondents who were dismissed from their jobs, 57% did not receive the legal compensation package³⁴ whereas for those who resigned (96 individuals), 46% did not receive the payments they were entitled to (salary, allowances, Christmas/Easter bonuses, overtime, etc.).

Furthermore, out of all respondents, 86 individuals were found to have had a work accident when they were asked to state whether they "received compensation/sickness allowance/sick leave/coverage of hospital care expenses following a work accident", both in declared and undeclared job positions. Thirty-three percent (28 individuals) of those employed in declared job positions did not receive the required compensation/sickness allowance/sick leave/coverage of hospital care expenses, and 7% (4 individuals) were not sure if they had received them.

Labour rights violations are evident in the findings of this survey in both declared and under-declared job positions. Additional incidents that were reported concern the payment

34. Note: Not all employees are entitled to compensation - this is related to type of contract and duration of employment, data that are not investigated by the present survey <https://www.gov.gr/en/sdg/work-and-retirement/terms-and-conditions-of-employment/frequently-asked-questions/how-is-severance-pay-calculated/>

process. Specifically, 12% did not receive their salary as agreed, and 34% experienced delayed payments (after 10 days). Only 26% received their total earnings. Furthermore, 28% did not receive any public holiday allowances, 36% were not paid annual leave allowances, and 23% did not have their insurance contributions paid. Lastly, 17% did not sign an employment contract at the very beginning of the work relationship, while 35% had their working hours inaccurately reflected in their contracts.

Significant correlations between the variables related to labour rights violations and the personal characteristics of individuals (e.g. gender, nationality, age) were not identified, meaning that the demographic profile of the migrant did not influence whether or not their labour rights were upheld. Nevertheless, discriminatory behaviour that could possibly be associated with these characteristics is not examined through this research. This observation leaves room for the possibility that respondents might still have faced discrimination, even though it was not directly investigated.

5.2

Undeclared work and labour rights violations

Undeclared work has significant implications both for individuals and for society as a whole. Individuals in undeclared job positions face challenges in their living conditions and integration, experiencing both legal and social barriers that leave them dependent on lower-paying, insecure work. Limited education can further restrict their upward mobility, access to stable employment, and opportunities to establish professional networks.

At a societal level, undeclared work poses significant challenges; it threatens the sustainability of the welfare system, negatively impacting insurance costs that employers are required to contribute for their personnel. These broader issues underscore the need for policies that address both the personal and systemic impacts of undeclared labour.

In our survey, we are exploring the experiences of respondents who are working or have worked in undeclared jobs to identify certain violations of labour rights and examine the differences between their situation and that of those individuals working legally.

Results showed that 68 individuals, i.e. 30% of the participants, worked in undeclared job positions in eleven (11) labour market sectors, primarily in construction (25%), domestic care (18%), tourism (13%), and manufacturing (12%).

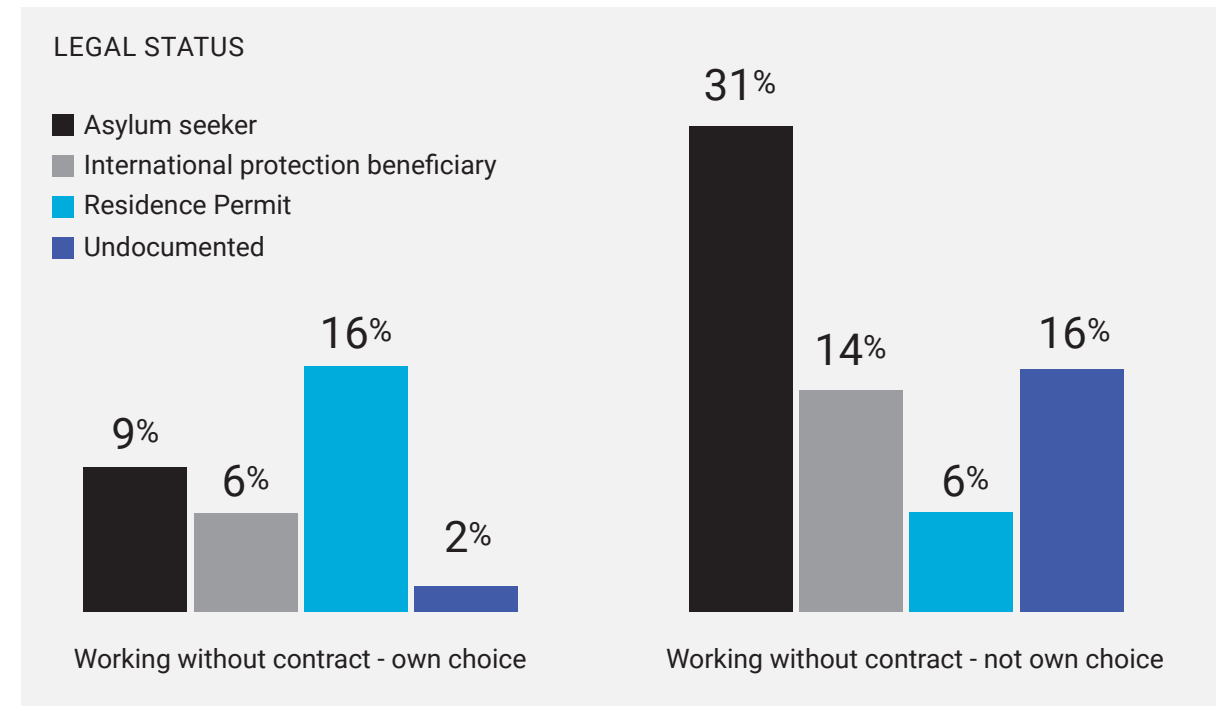


Table 4: Legal status distribution per type of contract choice.

Exploring the personal characteristics of those respondents, female participants make up 34% of those working without contracts. Most undeclared workers are asylum seekers (40%), followed by residence permit holders (22%). Nearly half (43%) of those workers have limited education, attaining up to the primary level of education. A significant 38% of these individuals have lived in Greece for only 2 years or less. Most (60%) of these workers have minimal professional experience within Greece.

Of respondents working in undeclared job positions, 63% do so involuntarily.

“There were discriminatory behaviours because of the hijab I was wearing. Because of those behaviours, I was forced to transit to another labour market sector, working without a contract.”

Female, 44 y/o employee from Egypt

75% did not receive their payment as agreed with the employer, however, there was no delay in the payment for 77% of them. Indicatively, 59% reported receiving less money than their Greek colleagues.

Furthermore, in cases where individuals resigned from their duties, 58% were not paid the total amount of money they were entitled to (salary, allowances, Christmas/Easter bonuses, overtime, etc.). As already mentioned, 86 individuals reported they have had a work accident, either in declared or undeclared job positions. Twenty-two percent (19 individuals) of those employed in undeclared job positions did not receive the required compensation/sickness allowance/sick leave/coverage of hospital care expenses.

After analysing the correlation between the respondents' legal status and their willingness to sign a formal contract, it was observed that mostly asylum seekers (31%) were employed without a contract against their will (Exact $p=0.005$), with a medium effect size (Cramer's $V=0.458$, $p=0.003$).

According to scholars, undeclared workers are at risk of social exclusion, while undeclared work has structural effects on the national economy. Specifically, individuals working undeclared do not have the right to access social insurance and further social security provisions. Such workers are further subjected to exploitation and are faced with low enforcement of labour rights, more insecurity, less continuity of employment, and the inability of accruing wages. This is especially true for low-skilled workers and less qualified occupations.

At a structural level, irregular employment and the informal economy threaten the sustainability of welfare systems; they instigate a race to the bottom around standards and safeguards, as businesses abiding by legal procedures struggle to be able to compete with those who do not, resulting in increased deregulation and liberalisation of the labour market. An additional factor is the segmentation of the labour market into highly paid, highly skilled, and stable work positions that rely on low-skilled, low-paid, and highly volatile positions. This hinders the integration of migrants and refugees, who primarily cover the latter job category. Another structural factor pertains to a country's social norms. Previous research suggests that in some European countries it is easier to "hide" employees compared to others, especially in economies where agriculture, construction, manufacturing, service provision, small and family firms, and self-employment prevail.³⁵

For both declared and undeclared workers, labour rights are systematically violated. Workers in declared positions are affected by the prevalence of underdeclared employment, which undermines their ability to fully exercise their rights, including access to the social welfare system. On the other hand, undeclared workers are entirely excluded from access to the social welfare system.

35. Supra note 34

5.3

Impact of violations and coping strategies

Participants who experienced violations of their labour rights both in declared and undeclared work provided their approaches to responding to the situation.

Significantly, only 37% of the respondents did not experience any violation, whereas the remaining **63% experienced at least one violation of their labour rights**, regardless of their status as an undeclared or declared worker.

Notably, 35% of the respondents that faced a violation reported taking no further action to address the violation, citing multiple reasons.³⁶ Notably, 55% feared losing their job after reporting it, 33% were unaware of the legal channels for reporting such issues, 26% cited their inability to speak Greek, and 15% mentioned their volatile legal situation, as most of them were asylum seekers and beneficiaries of international protection, in other words, they did not hold permanent residence permits. Additional reasons for not declaring a labour rights violation included working in a family/friend's business (6%), financial reasons (5%), or believing that no violation had occurred (4%).

Only 26% of the respondents confronted violations of their labour rights. Specifically, fifteen percent (15%) communicated them to their employer, family (8%) or colleagues (8%), or even resigned (6%). Only 3% reported the situation to the relevant authorities.

Furthermore, 11% reported other pathways for confrontation, such as getting into a fight with the employer, reporting the violation to the police, or requesting further advice from an accountant. Out of the individuals that reported the situation, most were facing a situation of unpaid overtime.

Forty percent (40%) of the participants (92 individuals) stated that violations of their labour rights have severely impacted their lives. Notably, 50% were unpaid during illness and 36% during annual leave, 38% struggled to cover medical expenses, 16% could not renew residence permits (due to lack of pension contribution stamps), and 22% were unable to apply for unemployment benefits (following dismissal/end of contract).

36. See for example on Greece: Platform subgroup on safe reporting and complaint mechanisms for workers to denounce abuse and seek support, Output paper, March 2024, Available at: https://www.ela.europa.eu/sites/default/files/2024-04/Subgroup_output_paper-Safe_reporting_and_complaint_mechanisms.pdf See also: FRA, Fundamental rights of migrants in an irregular situation in the European Union, 2011, available at: <https://fra.europa.eu/en/publication/2012/fundamental-rights-migrants-irregular-situation-european-union>

5.4

Survey testimonials

When participants were asked to share their thoughts concerning the topic of the survey, they had the opportunity to share some comments. Indicatively, respondents added the following:

"I understand that it's because I am a migrant that I am being abused".

"My Greek colleagues (women) misbehave towards me".

"There is diversity as a front; many times, I have been recruited so they can demonstrate there is diversity (in the workplace)".

"Racist behaviour by Greek colleagues".

"Since I do not have legal documents, many times the employers did not pay me and I could not go to the police".

"Language is important; they treat you differently when you speak Greek".

6.

Conclusion

The findings of the survey reveal significant insights into the profile, working conditions, and coping strategies when faced with rights violations for migrants and refugees in Greece. The 228 respondents came from diverse backgrounds across Africa, Asia, and Europe (outside the EU), with the largest groups being from Albania, Ukraine, Nigeria, Afghanistan, and Pakistan. The majority of participants were male aged 19-39, and most had valid legal status to work in Greece.

Profile & vulnerabilities:

- **Demographics:** 59% of respondents were male, primarily younger than 39, while most female participants were over 40. A significant part (47%) has been in Greece for over seven years and 30% has completed mandatory education in Greece.
- **Living Conditions:** 74% lived independently; but 12% were in either unstable housing conditions (11%) or homeless (1%). Most lived without a partner (69%). 25% of those without a partner were single parents, and more than half of them were single mothers. A substantial number faced challenges in sustaining their livelihood, often requiring supplementary support from social services, NGOs, or friends.
- **Legal and Documentation Issues:** Many were at risk of losing their legal status due to either holding a non-permanent residence permit or seeking international protection.

Employment and working Conditions:

- **Sectoral Breakdown:** 66% of respondents were employed in low-skilled positions, primarily in tourism, construction, and domestic work, with significant exploitation risks for those in undeclared work.
- **Professional Experience:** 53% had more than two years of professional experience in Greece
- **Undeclared Work:** About 30% of the respondents were engaged in undeclared work, particularly in construction and household care services. There is a significant positive correlation between positions paid in daily wages and undeclared work.

- Labour Rights Violations: A significant percentage worked more than the legal hours (overtime/overwork) for low wages, with 26% working more than 8 hours per day while earning less than €780.
 - **Documented Work:** Many participants, even those with formal contracts (160 out of 228), experienced violations, such as delayed payments (more than 10 days), lack of proper compensation, and non-payment of insurance or holiday allowances. Moreover, 26% received an amount of their wage/salary in cash, while 34 respondents did not receive legal compensation after dismissal, and 28 did not receive compensation/sickness allowance/sick leave/coverage of hospital care expenses after a work accident.
 - **Undocumented Work:** Participants with informal agreements (68 out of 228) reported facing multiple forms of exploitation; 75% of the respondents did not receive their payment as agreed, and 58% did not receive the amount of money they were entitled to after resignation. 19 out of the 28 individuals who faced a work accident during their shift did not receive any compensation. Asylum seekers (31%) represented the largest group employed without a contract against their will.

Coping strategies and impact of violations:

- Response to Violations: When facing labour rights violations, 35% of respondents took no action, often due to fear of losing their job, lack of knowledge of reporting channels, language barriers, or insecure legal status. Only 3% reported violations to authorities.
- Impact of Violations: Violations severely impacted the lives of 40% of those faced with a violation; those violations included unpaid leave, difficulty covering medical expenses, and even difficulties renewing residence permits or applying for unemployment benefits.

6.1

Policy recommendations

Based on the survey findings, several policy recommendations can be made to address the vulnerabilities, exploitative working conditions, and integration challenges faced by migrants and refugees in Greece. These policies could aim to improve their access to rights, increase protection against exploitation, and foster better integration into the labour market and society.

1. Strengthen systemic enforcement of labour rights

- **Improve inspections and enforcement:** Improve the capacity of the Labour Inspectorate in terms of staffing, awareness-raising activities and penalty enforcement, especially considering it is the only national mechanism with the power to monitor the labour market. This will contribute to more effective workplace inspections, especially in sectors prone to exploitation like construction, domestic work, and agriculture, in order

to ensure that labour rights (e.g., minimum wage, wage compliance, working hours, safe working conditions) are respected for both documented and undocumented workers.

- **Enhance access to legal channels:** In collaboration with CSOs, Bar Associations and the Labour Inspectorate, provide accessible, multilingual legal aid and reporting channels for migrants, asylum seekers, and refugees who experience labour rights violations. Simplify the process for filing complaints, ensuring anonymity and protection against retaliation from employers.
- **Sensitise trade unions, employer organisations, and other institutional stakeholders** through awareness raising sessions related to the working conditions of Third Country Nationals, the violation of their rights, and the need to support their economic and social integration.

2. Formalise undeclared work and provide relevant incentives

- Encourage employers to **formalise employment:** Implement tax benefits, subsidies, or other incentives for employers who formally hire migrants, asylum seekers and refugees, while reducing the bureaucratic obstacles for documented employment, particularly for asylum seekers and those with temporary status.
- Targeted **legalisation programmes:** Extend the application timeframe for the current legalisation programme under Article 193 Law 5078/2023 to ensure more people can benefit from this opportunity. Design additional programmes to regularise undeclared workers, ensuring their access to legal protection, social security, and benefits. This could involve work permits and/or incentives for employers to formalise the employment of their workers. This will also strengthen the country's welfare system, by integrating more workers into the formal economy.

3. Provide legal status and job security

- **Accelerate processing** of work permits and asylum applications: Streamline the bureaucratic processes related to residence and work permits, especially for those at risk of losing legal status.
- Ensure **enhanced access to permanent status** for long-term residents: Reform the pre-conditions for access to ten-year residence permits (i.e. reduce application fees, simplify methods to prove genuine links to the country) for migrants and refugees who have been in Greece for a significant period, thus reducing their vulnerability to exploitation due to insecure legal status.

4. Empower migrants and refugees through information and training

- Provide migrants and refugees with the necessary information, education, and empowerment on labour rights to enable them to act as advocates through their representative bodies. This approach aims to facilitate their active participation in advocating for the enforcement of their labour rights and the improvement of working conditions.

- Design **tailored language training** programmes: Increase access to free Greek language courses for migrants, asylum seekers, and refugees, focusing on improving language skills based on their own and the labour market's needs, to address the barrier to employment and rights.
- Provide **targeted job-search assistance** through employment support services: Facilitate job matching through a centralised organisational structure.
- Offer **vocational training and certification**: Introduce targeted vocational training, apprenticeship programmes, and skills certification for sectors where there are labour shortages (e.g. tourism, construction, healthcare). Training should be tied to formal employment opportunities and support the transition from low-skilled to higher-skilled positions.

5. Ensure better living conditions

- Address precarious living situations: Develop and promote policies on **affordable housing solutions** for migrants, asylum seekers, and refugees, through a collaboration between the Greek government, local municipalities, and private sector developers to increase the supply of affordable housing units. Support these policies by increasing accessibility to temporary rental assistance programmes helping to offset high rental costs for migrants and refugees.

7.

Previous research, data & bibliography

A number of studies have documented the substantial role of migrant labour in Greece in sectors such as agriculture, construction, tourism, and domestic work. In these industries, undeclared work is widespread, with many employers opting to informally employ migrants to reduce labour costs. Reports by institutions like the [International Labour Organisation \(ILO\)](#), the [European Labour Authority](#) and the [General Confederation of Greek Workers](#) have noted that migrants make up a significant portion of the workforce in these sectors.

Greece's **shadow economy** is estimated to be one of the largest in the European Union, with undeclared work accounting for approximately [20-30% of GDP](#) (2023). Migrants play a significant role in this informal sector, particularly those who are undocumented and lack access to formal labour markets.

Research by [Kapsalis \(2015\)](#) indicates that high levels of unemployment and economic instability, particularly following the 2008 financial crisis, have exacerbated undeclared work. Migrants are often hired informally because they are perceived as a cheaper and

more flexible labour force compared to local workers ([Maroukis, Iglicka and Gmaj \(2011\)](#)). Furthermore, bureaucratic obstacles in acquiring residence permits or work visas further push migrants into informal sectors. ([Triandafyllidou et al. 2020](#))

A study by [Maroukis \(2016\)](#) explores how undocumented migration in Greece intersects with the informal labour market. This nexus has particularly affected refugees and migrants who arrived in Greece during the high migration movements of 2015 ([Triandafyllidou et al. 2020](#)). Unable to find legal pathways to work, undocumented migrants often engage in informal employment ([Maroukis, Iglicka and Gmaj \(2011\)](#)).

A study by [PICUM \(2022\)](#) analyses key EU legal texts on undocumented workers' rights, focusing on labour rights and employment law. Among others, the study highlights legal texts that apply to undocumented workers such as the "Employers' Sanctions Directive" ([Directive 2009/52/EC](#)), which provides minimum standards on sanctions and measures against employers, and the [EU Charter on Fundamental Rights](#). It also focuses on texts that should apply to undocumented workers (as they refer to 'worker' without any definition, or are applicable to anyone in an employment relationship according to national law) such as the "Working Time Directive" [Directive 2003/88/EC](#) on minimum working hours standards in the EU. Another study by [LIBE \(2022\)](#) analyses the nature and causes of the gaps between the fundamental rights protections enshrined in EU legal standards and the rights accessible to undocumented migrants working in EU Member States in practice, and discusses strategies for how these 'protection gaps' can be reduced.

The regulatory framework of the Greek labour market is often ineffective in addressing undeclared work ([ILO 2016](#)). Labour inspections are scarce and under-resourced, with limited enforcement and monitoring capacity. Moreover, their educational role regarding information dissemination on the impact and consequences of undeclared work and how it can be prevented or dealt with is generally disregarded, according to public opinion. On the contrary, labour inspectors are perceived solely as instruments for imposing fines and penalties ([ILO, 2016](#)).

Migrants working in undeclared jobs face various forms of exploitation, including long working hours, wage theft, unsafe conditions, and physical or psychological abuse. Migrants with undocumented status rarely raise claims against their employers due to fear of deportation and lack of information on legal remedies and labour rights ([FRA, 2011](#)). That is despite the fact that work accidents are much more common among migrant workers ([Anastasiou, et al., 2015](#)), as are cases of violence ([Racist Violence Recording Network 2022](#)). These conditions are well-documented, particularly in agriculture (e.g. the [Manolada strawberry farms case](#) in 2013, where migrant workers were shot for protesting unpaid wages).

A study by [Fouskas \(2021\)](#) highlights the nexus between exploitation and racism in the Greek labour market, noting that migrants, especially those of African and Asian descent, are often marginalised and face significant discrimination, in addition to labour exploitation.

Migrants in undeclared work are excluded from social welfare, meaning that they are prevented from accessing healthcare, pension contributions, unemployment benefits, or legal remedy in cases of abuse. This exclusion makes them more vulnerable to health issues and economic instability.

According to a study by [PICUM \(2020\)](#), migrants with an undocumented status, especially women in domestic work, face not only labour exploitation, but also isolation and social exclusion, as their work is typically hidden within private households (See also: [Angeli, 2017](#)). The nexus between migrant status, undeclared work and gender in Greece and its impact has been raised in research by Diotima Centre ([2014](#), [2006](#), [2003](#))

The National Strategy for Integration, published in July 2019, outlined specific measures aimed at facilitating labour market access for refugees, such as the registration and recognition of their skills and qualifications, with a focus on employment in the agricultural sector and the promotion of entrepreneurship. However, this strategy emphasised early-stage reception and integration, without offering sufficient measures for long-term integration (Koubou et al., 2020). Similarly, the draft National Strategy for Integration, submitted for consultation in [January 2022](#), referred to important goals and actions, while aligning with the principles and recommendations of the European Commission's Integration Action Plan and guidance from international organisations like the OECD. However, the strategy fell short of fully adopting these recommendations (GCR, 2022). As noted in a relevant report (Generation 2.0 RED, 2022), the proposed actions across different chapters are fragmented, lacking in-depth analysis of the tools and practices required for effective implementation. Moreover, there is ambiguity regarding the entities responsible for carrying out these actions.

According to a recent study ([IOM, 2022](#)) there is a significant shortage of labour across all sectors of economic activity in Greece, specifically in Epirus, Thessaly, and Crete. Greek businesses are generally aware of potential employees that can be found among the refugee population and show a positive attitude, with some having prior experience in hiring refugees. However, the actual employment rate of refugees remains low, due to several barriers. The main challenges include language barriers, skills gaps, and legal/bureaucratic issues. These factors complicate the hiring process for refugees. The temporary nature of most available jobs provides limited opportunities for long-term, stable employment, making relocation to areas outside major urban centres less attractive. In addition, the lack of affordable housing and high rental prices are major obstacles, requiring comprehensive policy solutions.

A series of studies (Kapsalis et al., 2023; GCR, 2022; Tramountanis et al., 2022; UNHCR, 2024) have highlighted additional factors that are crucial for securing employment, with knowledge of the Greek language consistently identified as the most significant. The lack of social networks, difficulties in finding legal employment, the absence of legal documents, and the inability to certify skills and qualifications are also noted as factors that hinder access to the labour market.



Revealing the Unseen

Migrant Workers

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