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From Transposition to Transformation:
Implementing Pay Transparency in Greece through Law 5316/2026 and the FAIR PAY Project

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Abstract

Pay transparency in Greece rests on two main pillars: Law 5316/2026, published in July 2026 to transpose Directive (EU) 2023/970, and the FAIR PAY project, which provides capacity building, practical tools and a forum for consultation on pending guidance. The Greek model reorients equal pay policy away from individual dispute resolution and toward preventive pay governance aiming at remedying the deeply rooted structural and cultural barriers by transforming the culture on pay transparency. Although the model is promising, it is institutionally demanding, requiring high administrative resources; also, it remains incomplete since the current legal and reporting obligations do not apply to micro and SMEs, which represent 75% of the Greek labour market. Its success will depend on clear guidance, coordination among the three monitoring authorities and ERGANI's, the existing digital labour reporting system, capacity to support effective monitoring and corrective action. Greece benefits from rapid legal responsiveness, an existing digital labour-reporting system and early support for stakeholders; however, further technical, operational and administrative work is needed to maximise the impact of this strong but still incomplete framework.

1. Delineating the context

1.1 Background

The unjustified gender pay gap in Greece remains at 13.4% according to the latest administrative and survey data from the Hellenic Statistical Authority[1]. Although this rate is close to the European Union average, Greece's broader labour-market inequality is reinforced by its low women's employment rate of 55% compared with 72% for men[2]. The gender pay gap varies significantly across economic sectors, ranging from wide disparities in tech to negative gaps in waste management. The largest gap is recorded in the Information and Communication sector, where women earn 25.3% less than men. The lowest gap is found in Water Supply, Sewerage, and

[1] https://www.statistics.gr/documents/20181/69f0a44c-461d-dd03-8bb1-c4240e49b915
[2] https://www.greeceinnumbers.com/en-gb/home?fbclid=IwY2xjawUOgb9wZG9mBWV4dG4DYWVtAjEwAGJyaWQRMTQ2cWdqWGcxTGdKUGpvaWNzcnRjBmFwcF9pZBAyMjIwMzkxNzg4MjAwODkyAAEeJQgr0SWvC5PYOqvsPudXw4P4RT68VkWtDnl6__1awDRui7zkP2PXjVJ130M_aem_-kgfO80pJTxyTIiJDTMpkQ

Waste Management, where men earn less than women by -5.5%. The Wholesale and Retail maintain a stable 20,1% gap, the financial and insurance activities show a consistent 19% gap, the Manufacturing & Real Estate hover around 12,4% to 18,7%, whereas the professional, scientific and technical sector narrows down to 11,8%. An interesting additional note is that the gap widens drastically with age, expanding to 21.5% for women aged 65 and older, which significantly drives a downstream gender pension gap.[3]

The persistent gender pay gap in the Greek labour market is driven by a combination of structural economic conditions, cultural expectations, and occupational segregation. Although direct discrimination remains a factor, main systemic barriers, such as the "motherhood penalty" and unpaid care work, the occupational -horizontal and vertical- segregation, the high rates of involuntary part-time work, the lack of pay transparency and the low overall women's employment rate, are the primary drivers. Greece seeks to address as much as possible the causes of the gender pay gap through Law 5316/2026 on pay transparency.

1.2 The legal context

1.2.1 The scope of the L. 5316/2026

Greece is one of the few Member States to have closely aligned with and swiftly transposed Directive (EU) 2023/970 on pay transparency into national law. Being a major milestone in the Greek labour market, Law 5316/2026 was published in the Government Gazette on 6 July 2026. While the pay transparency obligations are deferred until 1 November 2026, its remaining provisions have been applied since 6 July 2026. Targeting to provide a strong framework for the application of equal pay between men and women for equal work or work of equal value, it establishes gender-neutral pay structures, pre-employment salary transparency, rights of access to pay information, and restrictions on pay secrecy. It further broadens the anti-discrimination framework by recognising intersectional discrimination based mainly on gender. In this respect, the law seeks to standardise career progression and require employers to address biased remuneration practices.

1.2.2 Reporting

The law applies across the employment relationship, from recruitment to ongoing employment. Employers subject to reporting duties must disclose detailed gender pay gap data and conduct a joint pay assessment with employee representatives where an unjustified gap of at least 5% is identified[4]. Reporting obligations apply gradually by employer size, beginning in 2027 for larger employers and in 2031 for employers with 100–149 employees. Non-compliance carries legal and commercial consequences, including administrative fines, employee compensation claims, a

[3] https://www.statistics.gr/documents/20181/69f0a44c-461d-dd03-8bb1-c4240e49b915

[4] Variable remuneration may be a significant factor causing a company to exceed the permissible 5% gender pay gap threshold. Employers should report base salary and variable remuneration separately to allow the source of any pay disparity to be identified with precision.

burden of proof shifted to the employer, and possible exclusion from public contracts, tenders, or subsidized programmes. Monitoring authorities are the Greek Ombudsman, the Independent Labour Inspectorate and the Ministry of Labour and Social Security.

1.2.2.1 ERGANI: the central digital system for employment data reporting.

ERGANI is Greece's central digital system for employment data reporting, such as hires, contracts, working time, overtime, and terminations. It supports digital employment monitoring and will also serve as the channel for gender pay gap reporting. The reporting regime should provide detailed evidence on pay inequality, including median gaps, variable pay, pay quartiles, and gaps by employee category.

1.2.3 Implementation

Implementation remains limited and transitional. Although Law 5316/2026 is in force and ERGANI can support pay-gap reporting, core obligations are not yet fully operational. Full implementation depends on pending measures, including technical specifications for the reporting platform in ERGANI, a methodology for assessing work of equal value, rules for joint pay assessments, sanctions, and mechanisms to address small-enterprise coverage. Without these, implementation may remain formal rather than substantive, particularly in relation to data quality and effective audits. Large companies have collected pay data since July 2026, but submission templates and the legal framework for Joint Pay Assessment committees are still pending.

1.2.4 Effectiveness & Efficiency

Law 5316/2026 creates an enforceable framework for labour-market change through employer burden-of-proof rules, pre-employment transparency and stronger oversight by the Labour Inspectorate and the Greek Ombudsman. Its impact, however, may be limited by compliance costs and increased monitoring demands. The law therefore prioritises long-term pay equity over short-term administrative efficiency, with success depending on streamlined audits and robust enforcement.

2. Policy debates

Following consultation and the adoption of Law 5316/2026, attention has shifted from transposition to whether pay transparency can advance equality without imposing disproportionate administrative burdens. Equality bodies and employee representatives emphasise the need for accurate, comparable and verifiable pay data to reveal hidden structural inequalities, while employer organisations stress regulatory complexity, compliance costs and uncertainty over implementation. These competing priorities frame the prevailing current policy debates.

Criteria for evaluating and classifying jobs remain central to the policy debate because they determine which work is recognised as work of equal value and which skills are reflected in remuneration. Their design has a normative dimension: sub-criteria, weighting factors and comparison methods may either correct existing biases or reproduce them under the appearance of objectivity. This is particularly relevant to

skills associated with women-dominated sectors, such as care, communication and services, where valuation remains contested between economic and equality-based approaches to pay. The debate also concerns the scope and design of the new obligations. Key issues include whether reporting duties should extend to SMEs and micro-enterprises despite administrative burdens; whether Greece should adopt a single national model or sector-specific guidance; whether data should be aggregated or disaggregated by employee category and remuneration type; and whether compliance should rely on sanctions or supportive guidance, particularly for smaller employers.

3. Good practice

3.1 The FAIR PAY project - Overview and objectives

The FAIR PAY project (2025–2026), co-financed by Greece and the European Union through the Citizens, Equality, Rights and Values (CERV) programme, promotes pay transparency and supports efforts to close the gender pay gap in line with EU Directive 2023/970. It also serves as the main framework for the practical implementation of the national Law 5316/2026 on pay transparency. Coordinated by the General Secretariat for Equality and Human Rights (GSEHR), Ministry of Social Cohesion and Family, in partnership with the Centre for Research on Equality Issues (KETHI), WHEN (Equity, Empowerment, Change), and the Hellenic Entrepreneurs' Association (SEGE), the project aims to help align the Greek labour market with the requirements of the EU Pay Transparency Directive and the national legislation. Its main objectives and focus areas include pay transparency, gender-neutral evaluation, capacity building, stakeholder consultation, fair workplaces.

To achieve these objectives, FAIR PAY includes a series of actions such as the exchange of good practices, checklists and analytical tools (like pay gap calculator) for employers, consultation with relevant stakeholders, production of educational material for employers and employees, capacity-building seminars, and communication, awareness-raising, and networking activities among key actors.

3.2 How FAIR PAY supports the implementation of L. 5316/2026: Practical examples

FAIR PAY is the main practical vehicle for implementing Law 5316/2026, translating its legal framework, obligations and penalties into tools, guidance and training before employer duties take effect on 1 November 2026. For example,

- Law 5316/2026 requires written, objective and gender-neutral pay structures based on skills, effort, responsibility and working conditions. *FAIR PAY supports this through handbooks and checklists for objective job evaluation and salary-scale review.*

- Medium and large employers must submit gender pay gap data, with the first cycle beginning on 7 June 2027 for employers with 150+ employees. *The Pay Gap Calculator helps businesses assess and benchmark pay data before submission.*
- Where an unjustified gender pay gap of at least 5% is not corrected within six months, employers must conduct a Joint Pay Assessment with employee representatives. *FAIR PAY seminars and consultations support legally compliant dialogue and remedial action.*
- Employees may request written data on their pay and average gender-disaggregated pay for comparable roles. FAIR PAY awareness actions and templates help workers exercise this right and employers meet the two-month response deadline.

3.3 Impact and sustainability

FAIR PAY's value lies in early labour-market preparation, checklists, training, digital pay-gap tools and support for gender-neutral job evaluation. Its impact may be limited by micro-businesses' capacity, salary secrecy and alignment with national monitoring systems, making long-term success dependent on institutional support, employer engagement and cultural change.

FAIR PAY's link to the Equality Label, an official certification for enterprises applying equal-treatment and pay-transparency policies, gives the project a sustainability dimension. The label frames equal pay as both compliance and responsible business conduct, while supporting ESG reporting, stakeholder trust and the integration of inclusive pay systems into long-term governance.

4. Transferability aspects

Transferability should be understood as selective adaptation, not direct replication. The Greek and Slovenian experience illustrate that pay-transparency reforms cannot be replicated mechanically; their effectiveness depends on national institutional capacity, labour-market structure and equality culture. Both countries can strengthen pay transparency by combining legal obligations with practical tools, reliable data, social dialogue and an equality-oriented implementation culture.

Greece offers transferable experience in rapid legal transposition and the use of an existing digital reporting infrastructure, notably ERGANI, to support implementation. These elements may be relevant for Member States seeking to accelerate compliance, provided that digital capacity is accompanied by clear technical guidance, reliable enforcement and support for smaller employers. Greece could strengthen the transferability of its model by drawing on Slovenia's experience with collective bargaining, women's full-time employment and care infrastructure.

Slovenia, by contrast, highlights the importance of social dialogue, consultation and a stronger equality-oriented labour-market culture, which can improve legitimacy and practical acceptance of reform. The host country could also draw on Greece's centralised digital monitoring, legislative decisiveness and practical employer

guidance. In both cases, transferability depends less on copying specific legal rules than on adapting institutional tools to domestic labour-market realities.

A transferable European approach would therefore combine digital monitoring, interoperable reporting tools, enforceable legal obligations, structured social dialogue and supportive measures for employers and employees. Such a model would preserve national flexibility while promoting the shared objective of effective pay transparency and substantive pay equality.

5. Conclusions and recommendations

Pay transparency can contribute to substantive equality only when reporting obligations are supported by a whole-of-the-labour-market approach, clear guidance, reliable digital tools, social-partner involvement and effective enforcement. In Greece, immediate attention should be given to finalising and embedding the pay-transparency technical platform in ERGANI, developing gender-neutral job-evaluation guidance and ensuring clear, timely corrective measures for reported pay gaps. SMEs and micro-enterprises, which represent a substantial share of the labour market, require a flexible, costless and realistic compliance approach that limits administrative burden while helping to embed a broader culture of equal pay and pay transparency.

Effective implementation of pay transparency and Directive (EU) 2023/970 should be approached as a governance process that connects data, dialogue, monitoring and institutional accountability. It requires coordinated action at both national and European level. Nationally, Member States should ensure clear legal frameworks, reliable reporting systems, high-quality data, practical guidance, targeted SME support, social-partner engagement, effective remedies for unjustified pay gaps and sufficient institutional capacity for monitoring and enforcement. At European level, implementation can be supported through common guidance, exchange of good practices, interoperable tools, capacity-building initiatives and continued financial support for projects that translate legal obligations into practical workplace change.