Responses from the **Hellenic Council of State**

This questionnaire has been prepared in anticipation of the seminar to be held in Turin on 23 and 24 November 2026. In accordance with point 2 of the guiding principles adopted by the Hellenic Presidency of ACA-Europe, it aims to explore the current challenges facing administrative judges, particularly those related to technology, and more specifically the introduction of digitalisation and artificial intelligence into the organisation and functioning of the administration and administrative justice.

In order to gain an in-depth understanding of the various dimensions of these technological challenges, the survey is split into three parts:

Part A – The digitalisation of administrative proceedings, with a focus on the experience of various supreme administrative jurisdictions and the impact of this transformation on the organisation and conduct of judicial activity.

Part B – Automated administrative decision-making and judicial review by administrative courts, particularly issues of technical discretion, automation and the delimitation of judicial powers.

Part C – The role of the administrative judge and the use of artificial intelligence in the performance of judicial functions and in the decision-making process, particularly in light of Regulation (EU) 2024/1689, known as the 'AI Act', as well as other European Union standards and regulations, such as Regulation (EU) 2016/679, known as the 'GDPR', Regulation (EU) 2022/2065, known as the 'DSA', and Regulation (EU) 2022/1925, known as the 'DMA'.

Part A

The digitalisation of administrative proceedings and the use of artificial intelligence tools by the administrative justice system

A.I – Infrastructure and technological organisation

A.I.1 – Digital equipment and resources

1. What is the level of digital equipment available to judges and administrative staff?

☐ Non-existent
☐ Limited
☐ Intermediate
☐ High
X Complete
Please explain if necessary:

For the last decade, the level of digital equipment available to judges and administrative staff has been satisfactory. Over the last three years, a major project has been underway, with the active participation of the Council of State, aiming at the digital transformation of the Hellenic Integrated System of Administrative Justice Case Management (OSDDY-DD). Thanks to this project, each judge is currently provided with the hardware and software necessary to ensure secure and uninterrupted connectivity, regardless of their location worldwide. The equipment provided includes:
– a desktop computer connected to a secure institutional network and monitored by the Security Operations Center (SOC)
– a laptop computer, a tablet (provided exclusively to judges holding the rank of councilor), and a work smartphone
– a printer
– a remote digital signature
– an institutional email account
– a client application enabling access to the Virtual Private Network (VPN) without Multi-Factor Authentication (MFA). The potential use of MFA is currently under examination.
Additionally, there are about ten teleconferencing systems (including hardware and software) available to the President and the Vice-Presidents of the Court, and, of course, to their respective chambers.

The administrative staff is equipped with:
– a desktop computer connected to a secure institutional network and monitored by the Security Operations Center (SOC)
– a laptop computer (provided exclusively to Heads of the Secretariat of the chambers of the Court)
– a remote digital signature
– an institutional email account
– a client application enabling access to the Virtual Private Network (VPN) without Multi-Factor Authentication (MFA) (provided exclusively to Heads of the Secretariat of the chambers of the Court and to Court IT staff). The potential use of MFA is currently under examination.

2. Is the technological infrastructure (networks, servers, equipment, connectivity) suited to the day-to-day operational needs of the administrative jurisdictions?

☐ Strongly disagree
☐ Somewhat disagree
☐ Neither agree nor disagree
☐ Somewhat agree
X Strongly agree

Please explain if necessary:

The existing technological infrastructure sufficiently covers the daily operational requirements of the administrative jurisdiction. Even more so, a dedicated Disaster Recovery Room, a facility designed to restore IT infrastructure in the event of a primary data center failure, has been established to maintain uninterrupted judicial services during technical failures or emergencies. All systems function under defined Service Level Agreements (SLAs) that ensure system availability, prompt incident resolution, secure data backup, and rapid recovery.

A.I.2 – Cloud solutions, remote access and interoperability

3. To what extent does your jurisdiction use cloud-based solutions for its information systems?

☐ Not at all
☐ To a limited extent
X Moderately
☐ Extensively
☐ Completely
Please explain, where applicable, and, in the absence of cloud solutions, specify the alternative infrastructure solutions implemented:

Cloud-based solutions will be introduced into OSDDY-DD as part of the ongoing digital transformation, with availability to all users anticipated in October 2026. Until then, data are stored on local storage media and simultaneously transferred to the aforementioned Disaster Recovery Room, ensuring redundancy and continuous availability. The cloud will provide additional storage space to every user and facilitate digital collaboration among all users. The cloud will be administered exclusively by judicial personnel.

3a. Do the adopted technical solutions enable judges and staff to perform their duties remotely using the institutional equipment made available to them? If so, please specify any limitations.

A personal security code provides judges and designated administrative staff with access to OSDDY-DD. Through a secure VPN connection, authorised users can perform their duties remotely, including the electronic submission of documents (audience reports, draft decisions, etc.) that are essential to the conduct and conclusion of the proceedings. As mentioned before, the use of MFA is under examination.

3b. Are the applications being used interoperable with other national or cross-border judicial IT systems? If so, please specify the extent of this interoperability.

OSDDY-DD is interoperable with several IT systems, including the Integrated Information System of the State Legal Service, the Plenary Session of the Presidents of the Bar Associations of Greece (portal.olomeleia.gr), the Independent Authority of Public Revenue, the Ministry of Justice, and the European e-justice portal. In that regard, since 2025, all files related to presidential decrees of a regulatory nature have been transmitted electronically to the Council of State through a platform administered by the Presidency of the Hellenic Republic ("Papyros"). Judges of the Council of State have access to this platform and to relevant files to enable the Court to exercise its competence to provide an opinion on the legality of the aforementioned decrees.

Interoperability with additional national judicial and administrative IT systems, such as the Integrated System of Civil and Criminal Justice Case Management (OSDDY-PP) and the Integrated Information System of the Electronic National Social Security Entity, is underway.

A.II – Digitalisation and dematerialisation of judicial administrative proceedings

A.II.1 – Dematerialised administrative proceedings

4. Is a dematerialised judicial administrative proceedings system in place within your jurisdiction?

☐ No
☐ Yes, at an initial stage
☐ Yes, at an intermediate stage
X Yes, at an advanced stage
☐ Yes, on a fully integrated basis
Please explain if necessary:

The dematerialisation of judicial administrative proceedings is achieved through OSDDY-DD. Since 2015, this system has served as the central digital infrastructure for administrative justice, aiming to accelerate its administration and effective management, reduce operating costs, and improve the quality of services provided to citizens. It has evolved dynamically to meet the needs arising from the legislation, incorporating key functions including: (a) electronic filing of legal remedies and court documents; (b) real-time monitoring of exhibits; (c) case progress tracking by involved parties using a unique security code issued by the Court; (d) certificate issuance via the eThemisID application, which allows EU citizens to use their European electronic identity to request certificates from the Council of State, monitor request status, and obtain certificates electronically; (e) search for anonymised decisions; (f) use of advanced electronic seals; (g) system access and electronic submission of documents by judges and designated judicial staff; (h) electronic document handling;, and (i) interoperability with related information systems. A project to upgrade the existing

Integrated Information System is already underway, as mentioned before, with completion anticipated in the first trimester of 2027.

Within the broader framework of the digitalisation of judicial administrative proceedings, the following regulations are of particular significance:
(a) Pursuant to Article 20, paragraph 1, last subparagraph, of Presidential Decree 18/1989, as amended by Article 4 of Law 5119/2024, cases subject to council proceedings are assigned to judges of the Council of State (associate councilors and assistant judges) using an algorithm intended to ensure equal distribution.
(b) Pursuant to Article 36 of Law 4745/2020, exceptionally, hearings in all courts may be conducted remotely using secure technology, provided that, due to insurmountable obstacles, it is not possible for one or more judges to participate in person.
(c) Articles 133A to 133E of the Code of Administrative Procedure (Law 2717/1999), introduced by Articles 6 to 10 of Law 5028/2023, establish the framework for telematic conferences in ordinary administrative courts. These provisions authorise proceedings to be conducted using technology that transmits images and sound in real time, thereby enabling the participation and examination of individuals who are not physically present in the courtroom. In that regard, on March 11, 2026, the Administrative Plenary of the Council of State approved a draft provision allowing parties to participate remotely in Council of State hearings. The draft provision stipulates that, in exceptional circumstances, especially in cases of force majeure, attorneys may appear before the Council of State using remote technologies such as teleconferencing, provided they submit a request to the President of the competent chamber by the day before the hearing.

4a. When this system exists at least at an initial stage, do judges and staff process and sign documents exclusively in digital format in their everyday working practice?

☐ Never
☐ Rarely
☐ Occasionally
X Frequently
☐ Always

Please explain if necessary:

Currently, documents are processed and signed in both digital and paper formats.

4b. Percentage of paper files prior to the implementation of dematerialised administrative proceedings that have been digitised:

X 0–20%

☐ 20–40%

☐ 40–65%

☐ 60–80%

☐ 80–100%

A.II.2 – Digital services for members of the public, lawyers and public authorities

5. Are digital services available for filing documents, consulting files, notifications, payments or other related services? If so, please specify which ones.

See elements a) to e) in point A.II.1.4 above.

6. Do these digital services guarantee an adequate level of accessibility for people with disabilities?

X 0–20%

☐ 20–40%

☐ 40–65%

☐ 60–80%

☐ 80–100%

7. Are lawyers involved in the design, development and implementation of digital platforms and tools intended for their use?
If so, please specify the terms of this involvement.

Given their role as "collaborating in the interests of justice", lawyers contribute to the design, development, and implementation of digital platforms and tools for administrative justice. In this capacity, they submit proposals for the adoption of targeted measures. For instance, during the OSDDY-DD digital upgrade, the Council of State, in order to satisfy the Bar Association's request for its members (i.e. lawyers) to be able to have access to an overview of all their cases pending before the Council of State and the ordinary administrative courts (as opposed to the current system which offers access on a case by case approach) has developed a system of personalised screens and inboxes for every lawyer who handles such cases. These screens and inboxes will also facilitate everyday communication with the administrative courts. Furthermore, lawyers participate in committees regarding the digital transformation of justice system, such as the Permanent Scientific Committee of the Ministry of Justice, which evaluates the impact of Artificial Intelligence on the judicial system and submits

proposals to modernise the legislative framework to address technological advancements and safeguard the rights of all parties.

8. Are there any support and training measures in place for users outside the court system (lawyers, members of the public, government agencies) regarding the use of the digital tools available to them?

X YES
☐ NO

If so, please specify which ones

Support and training measures for users outside the court system, such as lawyers, members of the public, and government agencies, include manuals and practical guides available on institutional websites. Additionally, bar associations conduct seminars led by the Council of State to ensure users receive comprehensive and accurate information on the use of digital tools. Furthermore, the Training Institute of the National Center for Public Administration and Local Government develops and implements training programs for executives of the Public Administration and Local Government regarding information technology and digital services.

A.III – Security of information systems and data protection

A.III.1 – Compliance with the regulatory framework

9. Do your jurisdiction's information systems comply with European and national standards on security, data protection and digital preservation?

☐ Strongly disagree
☐ Agree only slightly
☐ Indifferent
☐ Somewhat agree
X Strongly agree

Please explain if necessary:

The security policy was updated in 2024 to comply with international information security management standards (ISO 27001). Incident management procedures, supported by a continuously operating (24/7) SOC, enhance national cybersecurity by ensuring effective incident detection and response. Furthermore, redundancy mechanisms and disaster recovery techniques, in conjunction with the Disaster Recovery Room, adhere to current standards to ensure digital continuity.

A.III.2 – Incident management and business continuity

10. Are IT security incidents dealt with promptly and effectively?
☐ Never
☐ Rarely
☐ Occasionally
☐ Frequently
X Always

11. Are business continuity and disaster recovery plans regularly updated and tested?

☐ Never
☐ Rarely
☐ Occasionally
X Frequently
☐ Always

A.III.3 – Publicity and dissemination of court decisions

12. Are court decisions available online in their entirety?

☐ Never
☐ Rarely (only for the most significant decisions)
☐ Occasionally
X Frequently (provided they have been anonymised)
☐ Always

Please add any additional information and explain if necessary:

The widest possible publicity for decisions of the Council of State and ordinary administrative courts is achieved by posting them on the courts' external portal (website), which is accessible to the general public (www.adjustice.gr). Access is provided to all decisions of the Council of State issued between 1929 and 1990, which are, in principle, non-anonymised, while decisions from 1990 onward are available only in anonymised form. Nearly all decisions since 2016 are anonymised. The above decisions of the Council of State are also accessible through the European e-Justice portal using the European Case Law Identifier (ECLI) search engine. Furthermore, most decisions are available on the digital portal of the Plenary Session of the Presidents of the Bar Associations of Greece (portal.olomeleia.gr).

The Council of State website also provides summaries of key decisions, bibliographic bulletins, case law information bulletins, and indexes of older case law.

13. Where a system for publishing decisions online is in place, is there an internal policy to ensure the protection of personal data and respect for the right to be forgotten?

☐ No
☐ No formalised policy; anonymisation is carried out by the registry services on a case-by-case basis
☐ No formalised policy; anonymisation is decided on a case-by-case basis on the instructions of judges
☐ Yes, personal data are systematically anonymised
X Yes, personal data are anonymised in accordance with an internal policy providing for targeted exceptions
☐ Other (please specify)

A.IV – Training and digital skills

14. Does your jurisdiction offer structured and regularly updated digital technology training courses for judges and staff?

If so, please specify which ones.

As part of its training activities, the National School of Judiciary organises seminars for all administrative judges and judicial staff on digitalisation of administrative justice, artificial intelligence, and cybersecurity. In addition, training seminars are organised to educate judges on implementing new digital services in administrative proceedings, such as teleconferencing and services to provide information on the progress of court registers and exhibits. Finally, in order for the digital transformation project of OSDDY-DD to be completed, all users, i.e., judges and staff, will undergo training in the new technologies used.

A.V – Involvement of judges in digital transformation

15. To what extent are judges involved in decision-making and design processes relating to technological innovation and digital transformation in the judiciary? If applicable, please provide details.

Judges are highly involved in decision-making and planning processes concerning technological innovation and digitalisation. The Information Systems Committee of the Council of State, composed exclusively of judges from the Court, is responsible for (a) monitoring the operation of OSDDY-DD, ensuring its efficient and secure functioning, upgrading and expanding its databases, and issuing necessary instructions; (b) safeguarding the confidentiality of electronic communications and personal data entered into the aforementioned system, in accordance with security protocols; (c) facilitating the training and ongoing education of judges and staff; and (d) approving the release of case law materials in digital format to public or private sector entities when

appropriate. Within this framework, the Information Systems Committee works closely with the General Data Protection Regulation (GDPR) Committee and the Committee on Communication and International Relations, both composed of judges from the Court and operating within the Council of State.

The General Committee of the ordinary administrative courts, responsible for overseeing these courts, has also established a Central Organising Committee under the Commissioner's supervision. This committee monitors and ensures the effective operation of the Integrated Information System across all ordinary administrative courts, working closely with the aforementioned Committee of the Council of State.

Judges also participate in other committees, such as the Permanent Scientific Committee of the Ministry of Justice and the Committee for Monitoring the Implementation of the Roadmap, as outlined in Article 17 of Law 5028/2023. The Roadmap defines areas of state intervention and details the phased establishment, organisation, and operation of telematic offices in regular administrative courts, as well as the introduction of telematic technologies in these courts.

Additionally, the Council of State issues opinions prior to the adoption of legislative measures concerning the digitalisation of administrative justice (see, for example, Administrative Plenary of the Council of State, decisions nos. 52/2023 and 4/2024, regarding the aforementioned Article 20, paragraph 1, last subparagraph, of Presidential Decree 18/1989, as replaced by Article 4 of Law 5119/2024).

A.VI – Use of AI systems in administrative justice

A.VI.1 – Tools and level of deployment

16. Are artificial intelligence systems currently used to assist in judicial or administrative activities?

The ongoing project to upgrade the OSDDY-DD, scheduled for completion in the first trimester of 2027, incorporates auxiliary artificial intelligence systems for searching and analysing case law as well as for anonymising decisions. Currently, only the anonymisation of Council of State decisions is being conducted in an initial trial phase using machine learning.

16a. If so, which ones are used? (Please tick all that apply)

☐ Chatbots

☐ Semantic search tools
X Automated anonymisation of decisions
☐ Text analysis and assistance with legal research
☐ Tools to assist with organisation and court management
☐ Other (please specify)

16b. Overall level of internal deployment of AI systems:

☐ Occasional or isolated use
X Trial phase (as far as the aforementioned anonymisation of decisions is concerned)
☐ Development phase
☐ Widespread use
☐ Full integration

Please explain if necessary:

A.VII – Governance, regulation and ethical framework for AI

A.VII.1 – Internal guidelines and regulatory compliance

17. Has your jurisdiction adopted any internal guidelines, charters or policies governing the use of AI systems, in particular in application of Regulation (EU) 2024/1689 (the AI Act), the GDPR and other relevant European instruments?

X YES

☐ NO

If so, please specify which ones.

As the OSDDY-DD upgrade project remains ongoing, the artificial intelligence framework has not yet been finalised. During the initial trial phase, decisions are anonymised in accordance with the criteria and guidelines established by the Permanent Scientific Committee of the Ministry of Justice for court decision anonymisation, as well as the manual for anonymising OSDDY-DD decisions within the project context.

18. Are AI systems subject to prior risk assessments?

☐ YES

X NO

If so, please specify the terms of these assessments

The artificial intelligence framework for the OSDDY-DD upgrade project is still under development. A key issue is whether Law 4961/2022 (see Part B below), which establishes the framework for artificial intelligence, applies to the courts, given the current absence of relevant case law.

19. Are there specific requirements in terms of transparency for the use of AI systems? If so, please provide details.

The artificial intelligence framework for the OSDDY-DD upgrade project is still under development. A key issue is whether Law 4961/2022 (see Part B below), which establishes the framework for artificial intelligence, applies to the courts, given the current absence of relevant case law.

20. Is the use of AI systems accompanied by human oversight mechanisms?

X YES

☐ NO

If so, please provide details

During the initial trial period for anonymising decisions using machine learning, the process is supervised by judicial clerks.

21. Are specific methodologies implemented during the design, development and deployment of AI systems to ensure their traceability, reliability, integrity and accuracy? If so, please provide details.

As the artificial intelligence framework for the OSDDY-DD upgrade project is still in progress, specific methodologies to ensure traceability, reliability, integrity, and accuracy have not yet been implemented.

A.VIII – Innovation, prospects and future needs

A.VIII.1 – Current innovation projects

22. Are there any innovation projects currently under way in the following areas? (please tick all that apply)

X Process automation
X System interoperability
X Modernisation of existing systems
X Advanced digital services for external users
X AI systems
☐ Other (please specify)

The digital upgrade of OSDDY-DD encompasses enhancements to the system's software technology, as well as implementation of additional functions for specific aspects of existing applications, with emphasis on the design and development of a suitable and easily manageable portal, the complete digitalisation/dematerialisation of the judicial process, further interoperability with other information systems, case law management, the ability to create digital case files with supporting documentation (legislation, case law, theory), and the publication of statistical reports (business intelligence). Additionally, the system will support a functional mailbox (e-service) for legal professionals, provided there is a relevant legislative provision. As previously noted, the upgraded OSDDY-DD will also incorporate artificial intelligence tools to optimise and update the existing case law index, as well as to anonymise decisions.

Article 346 of Law 4700/2020, as replaced by Article 176 of Law 4820/2021, stipulates the following: The Court of Audit shall develop artificial intelligence software to scan electronically submitted court documents. This software must enable mechanical reading to categorise documents by subject matter, identify relevant case law and legislation, and locate Court decisions addressing similar issues. In a later development phase, the software should allow mechanical reading of electronic case files to identify critical data for formulating the minor premise of legal reasoning. In that regard, the ongoing contract to upgrade the Court of Audit's Integrated Information System includes developing AI systems to create digital files for categorising pending cases and a virtual AI assistant, in the form of a chatbot, to process case data and propose draft decisions.

A.VIII.2 – Barriers to digital transformation

23. What do you consider to be the main barriers to the digital transformation of administrative justice? (please tick all that apply)

☐ Complexity of the regulatory framework
X Insufficient financial resources
X Lack of specialised human resources
☐ Organisational complexity
☐ Resistance to change and digital skills gap
☐ Cybersecurity risks and challenges
☐ Other (please specify)

A.VIII.3 – Investment priorities

24. What do you think should be the priority areas for investment over the next few years? (please tick all that apply)

☐ Modernisation of infrastructure
X Cybersecurity
X Training and skills development
☐ Deployment of AI systems
X Interoperability at European level
X Complete digitalisation of administrative procedures
☐ Other (please specify)

25. Please describe one or more good practices in digitalisation that have been implemented or are planned within your jurisdiction.

Good practices that have been implemented and are scheduled for further enhancement through digitalisation within our jurisdiction include the management of records through a predefined workflow that is systematically monitored to identify procedural errors, as well as the conduction of data analysis of procedural regulations to support recommendations for future improvements to legislative provisions. Furthermore, during the OSDDY-DD upgrade project, extensive consultations were held among the Information Systems Committee of the Council of State, the IT contractor, and all relevant stakeholders, including lawyers, administrative judges, and the General Committee of ordinary administrative courts. In that regard, a comprehensive and detailed technical report was prepared outlining the judicial procedures to ensure the system's effective operation.

Part B
Automated administrative decisions and judicial review

B.I – Automated administrative decisions: substantive legality and procedure

1. Are there provisions in your legal system that authorise public administrations to use digital or algorithmic technologies in the exercise of their powers?

X YES
☐ NO

If so:

1.a. According to these provisions, what are the authorised tools and the objectives pursued by their use?

Article 4, paragraph 1 of Law 4961/2022 stipulates that public sector bodies may use artificial intelligence systems to make or support decisions, or to issue acts affecting the rights of natural or legal persons, only when such use is expressly provided for by a specific legal provision that includes appropriate safeguards for the protection of those rights. The provisions of this law regarding the digital upgrade of public administration are intended to establish a framework that enables public (and private) sector entities to safely use artificial intelligence while ensuring transparency, accountability, and enhanced cybersecurity resilience.

1.b. What types of acts can be adopted using these technologies?
In particular, is the use of algorithms permitted for the adoption of administrative decisions involving discretionary powers?

No legislative data is currently available on this issue.

2. Are there provisions in your legal system governing the design, deployment and use of artificial intelligence systems employed by public administrations?

X YES
☐ NO
If so,

2.a. what type of implementation measures are these? (for example, legislative or soft law):

The implementation measures provided for in the law are mainly the following:
-Algorithmic impact assessment: Pursuant to Article 5 of Law 4961/2022, every public sector body using an artificial intelligence system shall conduct an algorithmic impact assessment before this system becomes operational. The assessment takes into account the following: (a) the intended purpose, including the public interest served by the use of the system; (b) the system's capabilities, technical characteristics, and operating parameters; (c) the types and categories of decisions or acts issued with the system's involvement or support; (d) the categories of data collected, processed,

entered into, or generated by the system; (e) the risks to the rights, freedoms, and legitimate interests of natural or legal persons affected by the decisions; and (f) the expected societal benefit relative to potential risks and impacts, particularly for racial, ethnic, social, or age groups, as well as populations such as persons with disabilities or chronic diseases. The obligation to conduct an algorithmic impact assessment, as provided herein, does not replace the obligation to conduct a data protection impact assessment pursuant to Article 35 of the GDPR.
-Transparency obligations: See point B.I.2.b. below.
-Obligations of artificial intelligence system contractors: Pursuant to Article 8 of Law 4961/2022, contractors of artificial intelligence systems are required to provide information to the relevant public sector body under conditions that allow for a comprehensive examination of the system's operation and the parameters considered in decision-making or decision support. Additionally, contractors must take appropriate measures during the design, development, and operation of the system to ensure its compatibility with the legal framework, particularly concerning the protection of human rights.
-Register of artificial intelligence systems: Pursuant to Article 8 of Law 4961/2022, every public sector body must maintain a register of artificial intelligence systems. The register shall include information specified in points (a) and (b) above, which pertain to algorithmic impact assessment. Additionally, it must include the system's commencement date, essential details such as name, version, and manufacturer, measures adopted to ensure safe operation, confirmation of the completion of an algorithmic impact assessment, and, where relevant, an impact assessment in accordance with Article 35 of the GDPR.

2.b. Is there an obligation for public administrations to inform the public or individuals about the use of AI systems?

Pursuant to Article 6 of Law 4961/2022, without prejudice to Articles 12 to 14 of the GDPR, every public sector body using an artificial intelligence system shall (a) publicly provide information regarding the system, and (b) ensure that any natural or legal person affected by a decision is informed of the parameters on which the decision was based in a manner that is understandable and easily accessible, including formats that facilitate access for persons with disabilities, such as easy-to-read and Braille.

2.c. Are any authorities or bodies responsible for developing general rules or standards for the use of artificial intelligence within public administrations?

Yes. The Coordinating Committee for Artificial Intelligence, established by decision of the Minister of Digital Governance, is responsible for (a) making decisions regarding the implementation and ongoing improvement of the National Strategy for the

Development of Artificial Intelligence; (b) formulating national priorities and guidelines to ensure effective implementation of the Strategy; and (c) designing and promoting policy proposals and actions, as well as submitting recommendations to public sector bodies for corrective measures if deviations are identified in the implementation of the National Strategy or if impacts on the fundamental rights of natural persons are observed (Articles 11 and 12 of Law 4961/2022). In this context, a Supervisory Committee for the National Strategy for the Development of Artificial Intelligence is established within the Ministry of Digital Governance to serve as the executive body of the Coordinating Committee for Artificial Intelligence (Article 13 of Law 4961/2022). Additionally, an Artificial Intelligence Observatory is established within the Ministry of Digital Governance, with the primary mission of collecting data on the implementation of the National Strategy, drafting reports on artificial intelligence activities in the country, and supporting competent bodies in setting priorities and identifying opportunities and areas of added value (Article 14 of Law 4961/2022).

Furthermore, a private legal entity, the "Hellenic Artificial Intelligence Factory Limited company", has been established to operate in favour of the public interest and is supervised by the Minister of Digital Governance. Its purpose is to create, support, and exploit innovative artificial intelligence technologies, as well as to strengthen research, entrepreneurship, and digital development in the country (see Articles 1-8 of Law 5263/2025).

3. What conditions must be met to ensure the legality of administrative procedures involving the use of artificial intelligence systems?

In particular:

3.a. Is the decision-making administration required to indicate the type of algorithmic system used and its principal characteristics?

3.b. At what stage of the procedure must the administration provide information about the use of an algorithmic system and its characteristics?

3.c. Does the interested party have the opportunity to comment on or challenge the use or operation of the AI system before the final decision is made?

As already mentioned, each public sector body is required to (a) maintain a register of artificial intelligence systems, including their operating parameters and technical characteristics (Article 8 of Law 4961/2022), and (b) provide public information regarding these parameters and characteristics to ensure that affected individuals are informed (Article 6 of Law 4961/2022). However, there is no specific provision or case law clarifying whether individuals have the right to comment on or challenge the use or operation of an AI system before an automated administrative act is issued. In that

regard, it should be noted that pursuant to established case law interpreting Article 6 of the Code of Administrative Procedure (Law 2690/1999) on the right to be heard before the issuance of any unfavourable administrative act, no prior hearing is required if such an act is based on objective criteria.

4. Are specific areas of administrative law in your country subject to express authorisation for the use of administrative decisions based on artificial intelligence systems?

As stated above, artificial intelligence systems may be used only when explicitly authorised by a specific legal provision. For example, Article 6 of Law 5256/2025 permits their use to record Highway Code violations, and Article 11 of Law 5142/2024 allows their use to support verification of land registry transactions.

5. Are there specific areas of administrative law in which the use of artificial intelligence systems for issuing administrative decisions is expressly prohibited?

Article 4, paragraph 2 of Law 4961/2022 excludes the Ministries of National Defence and Citizen Protection, their supervised bodies, and the National Intelligence Service, whose objective is to prevent, avert, deter, and neutralise espionage and terrorist threats, from the scope of the provisions governing the use of artificial intelligence systems.

Despite these exemptions, artificial intelligence technologies are utilised within the national defence sector. Article 58 of Law 5110/2024 stipulates that the Artificial Intelligence Department, under the Information Technology Directorate of the Hellenic National Defence General Staff, is responsible for the development and integration of artificial intelligence technologies into military systems and for fostering innovation to enhance national security.

B.II – Judicial review of automated administrative decisions

6. Does national case-law recognise the legality of automated administrative decisions?

X YES
☐ NO
Please explain if necessary:

If so:

6.a. What principles and conditions have been identified by national case-law as necessary for these decisions to be legally valid?

The Hellenic Council of State has ruled that, in the event of a dispute over an individual administrative act issued in whole or in part on the basis of an electronic automated procedure, the issue that arises is not the technological perfection of the relevant software or hardware employed, but rather the overall legality of the administrative act, i.e., the correct interpretation and application of the legal requirements of the rule of law governing its issuance. The administration's obligation to state the reasons on which its decision was based is, moreover, a constituent element of the rule of law, consistent with the principles of transparency and legality of administrative action, as well as with effective judicial protection. In this regard, Article 17, paragraph 1 of the Code of Administrative Procedure establishes the rule that an individual administrative act must contain a statement of reasons, including a finding that the legal conditions for its issuance have been met. Specifically, when the legality of an individual administrative act based on automated data processing is challenged, the decision issued on the relevant objection must indicate both the critical stages of the mathematical calculations performed by the authority and the actual data (variables) considered. This requirement ensures that the individual concerned is able to ascertain whether the conditions for the examination of the administrative act, as established by the relevant legal rules, have been met in their case, and that the court is able to exercise effective judicial review (see Council of State, decision no. **1206/2024)**.

Furthermore, the Court determined that using an algorithm-based electronic voting process to elect internal members of the Governing Council of Higher Education Institutions, does not violate Articles 16 (academic freedom), 5, paragraph 1 (personal freedom), or 25, paragraph 1 (principle of proportionality) of the Constitution. Although the system is complex, it is mathematically verifiable and includes safeguards and technical guarantees that uphold both the integrity of the voting process and the verifiability of election results (see Council of State, Plenary Session, decision no. **653/2024** and Council of State, decisions nos. **1593-4/2025**).

6.b. Have any limitations been identified with regard to the possibility of delegating the administration's decision-making power to algorithmic systems?

See point B.II.6.a regarding the administration's obligation to provide justification for an automated administrative act.

6.c. In particular, which of the following principles must be respected, according to national case-law, when adopting an automated administrative decision? (Please tick all that apply)

X Principle of transparency
☐ Principle of non-exclusivity of human intervention ('human in the loop')
☐ Principle of non-discrimination
X Principle of knowledge and comprehensibility of algorithmic functioning
☐ Principle of attributing the decision to an authority vested with power
X Other (please specify)

According to the aforementioned decision of the Council of State, the principles of legality and effective judicial protection are also applicable. It should be noted that the principles of non-exclusivity of human intervention ('human in the loop'), non-discrimination, and attributing of the decision to an authority vested with power have not been raised before the Court to date; hence, there is no case law in this respect.

7. Has national case-law ruled on the nature and legal classification of the algorithm or AI system used for administrative decision-making?

Currently, there is no specific case law regarding the nature or legal classification of algorithms or AI systems used in administrative decision-making.

8. What are the limits of the judicial review that administrative judges can exercise over automated administrative decisions?

See point B.II.6.a above.

9. According to national case-law, is the right of access to the algorithmic process that led to the automated administrative decision recognised?

X YES
☐ NO

If so:

9.a. What information relating to the AI system (data, logic, key parameters) must be made available to the party concerned?

As indicated in point B.II.6.a, the administrative decision must detail the principal steps of the authority's mathematical calculations as well as the data or variables considered.

Part C

Administrative judges and the use of artificial intelligence in the performance of judicial functions and in the decision-making process, in light of Regulation (EU) 2024/1689 (the 'AI Act') and other European Union standards and regulations, such as the GDPR, the DSA, the DMA, etc.

1. Does your country recognise, at constitutional level, principles that expressly refer to the use of artificial intelligence in the performance of judicial functions?

☐ YES

X NO

If so, please specify which ones

2. Has your country adopted or is it in the process of adopting national measures to implement Regulation (EU) 2024/1689 (the AI Act) concerning the use of artificial intelligence to support judicial decision-making, which is classified as a 'high-risk' activity (Annex III, point 8(a))?

☐ YES

X NO

To date, no specific legislation has been adopted regarding the Regulation (EU) 2024/1689 (the AI Act) in the field of administration of justice. Nevertheless, in the context of the ongoing OSDDY-DD update project, the IT contractor has prepared technical documentation to comply with the requirements set out in Article 11 of the Regulation.

If so:

2.a. What is the nature of these measures (legislative, regulatory, guidelines, soft-law instruments)?

2.b. For what purposes is the use of AI permitted? (Please tick all that apply)

☐ Research and interpretation of the law

☐ Research and assessment of the facts

☐ Application of the law to a specific factual situation

☐ Administrative activities that are purely ancillary (recital 61 of Regulation (EU) 2024/1689)

Please explain if necessary:

The artificial intelligence systems referenced above (see especially points A.VI.1.16 and A.VIII.1.22) are still in the design stage.

2.c. What measures are taken to ensure human oversight (Article 14 of Regulation (EU) 2024/1689)? In particular, under what conditions is the user able to ignore, cancel or override the result produced by the artificial intelligence system (Article 14(4)(d) of the AI Act), or to suspend or interrupt its use (Article 14(4)(d) of the AI Act)?

2.d. What regulatory measures have been adopted to ensure the transparency, accuracy and robustness of the artificial intelligence system used (Articles 13 and 15 of Regulation (EU) 2024/1689 – the AI Act)?

3. Are there any official forms of testing or use of artificial intelligence systems for decision-making or generating judicial decisions currently in place in your country?

☐ YES

X NO

Please explain if necessary:

As previously indicated (see point A.VI.1.16), the anonymisation of Council of State decisions is currently being conducted in an initial trial phase using machine learning. Regarding the Council of State and the ordinary administrative courts, no additional official testing or implementation of artificial intelligence is currently in place to assist or replace judges in administrative justice.

If so:

3.a What do they consist of?

3.b. What data sets are used?

3.c. Is the software used publicly owned or provided by private operators?

3.d. Have any biases been identified in its operation? If so, what kind?

4. Are measures planned in your country to ensure a sufficient level of artificial intelligence literacy specifically for judges (Article 4 of Regulation (EU) 2024/1689)?

☐ YES

X NO

If so:

4.a. What do these measures consist of?

4.b. Is specific training planned to prevent or limit the phenomenon known as 'automation bias' (Article 14(4)(b) of the AI Act)?

☐ YES

X NO

Please explain if necessary:

5. Is the use of generative or agentic artificial intelligence systems permitted in your country to assist in the drafting of procedural documents or court decisions?

To help you understand the question better: **generative artificial intelligence (AI)** is a category of AI models which, thanks to machine learning and training on vast amounts of data, are capable of creating original content (text, images, videos, music, etc.). **Agentic AI** is described as a system capable of autonomously planning, making decisions and executing complex tasks with minimal human intervention to achieve a defined objective [source: OECD].

The artificial intelligence systems referenced above (see especially points A.VI.1.16 and A.VIII.1.22) are still in the design stage; therefore, no relevant legislation or case law currently exists.

6. Has the national case law of your country addressed issues concerning the interpretation and application of EU Regulation 2024/1689?

☐ YES

X NO

Please explain if necessary:

6.a. If yes, which principles have been established?

7. Have national courts of your country submitted preliminary rulings to the Court of Justice of the European Union regarding EU Regulation 2024/1689?

☐ YES

X NO

Please explain if necessary:

7.a. If yes, which questions were referred? What answers has the Court of Justice of the European Union provided?