THE ECHR AND THE PROTECTION OF FAMILY LIFE

Recurring Principles in the Case-Law, Greek Cases, Compliance and Proposals for Institutional Reform

A Legal and Evidence-Based Study by "A Child Needs 2 Parents"

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Executive Summary

A comparative reading of the judgments examined in this study reveals a consistent European standard for the protection of family life. **Article 8 of the European Convention on Human Rights (ECHR) does not merely require States to refrain from arbitrary interference. It also imposes positive obligations on public authorities to take practical, effective and timely measures to ensure that the right of the child and the parent to maintain a genuine family relationship does not remain merely theoretical**.

- A judicial decision must be **effectively implemented in practice**, rather than remain a merely formal or unenforced legal entitlement.
- **Time is an autonomous and critical factor in the protection of family life**. Delays may create irreversible situations and render subsequent judicial protection ineffective.
- A child's refusal must be heard and properly assessed, but it does not automatically operate as an absolute veto, particularly where there are indications of a **loyalty conflict or external influence**.
- A parent's or third party's failure to cooperate does not release the State from its obligations. **Targeted measures, professional support and, where necessary and proportionate, effective sanctions against an adult who obstructs contact may be required.**
- The **best interests of the child** cannot automatically be equated with maintaining contact at all costs. Where violence or other risks are alleged or identified, an individualised risk assessment and a genuinely protective framework are required.
- **The quality of the decision-making process is essential**. This includes the effective participation of the parents, hearing the child in a manner appropriate to his or her age and maturity, comprehensive expert assessment, and a properly reasoned balancing of the competing interests involved.

Beyond identifying the principles developed through the case law of the European Court of Human Rights, this study examines more specifically whether the repeated judgments concerning Greece should be regarded as isolated failures or whether **their recurrence over time and their thematic convergence point to persistent shortcomings in the effective protection of the family life of children and parents**.

This question assumes particular importance where the Court's findings recur across different periods and concern related issues, such as **the speed of proceedings, the effective enforcement of judicial decisions, the preservation or restoration of family ties, and the procedural safeguards inherent in Article 8 of the ECHR.**

Key Findings Concerning Greece

The judgments delivered against Greece now document **multiple findings of violations in family-related cases**. Although these violations are not identical in nature, several recurring themes emerge: **excessive length of proceedings, inadequate or delayed enforcement, insufficient procedural protection, inadequate supervision of expert assessments, and discriminatory treatment in matters of parental responsibility on grounds of sex.**

The recurrence of these findings over time and their thematic convergence, combined with the limited capacity for systematic measurement of the implementation of family law, **justify an examination of whether these individual violations may reflect a broader structural deficit in the effective protection of family life.**

Methodology

This study does not seek to provide an exhaustive review of all the case-law of the European Court of Human Rights concerning family life. Instead, it selects judgments of relevance to:

- parent-child contact;
- parental responsibility;
- the enforcement of judicial decisions;
- the expeditious conduct of proceedings;
- the child's right to be heard;
- risk assessment;
- the restoration of family ties; and
- the procedural safeguards arising under Article 8 of the European Convention on Human Rights.

Judgments finding **no violation** are examined alongside judgments finding a **violation**, to identify not only instances of State failure, but also the criteria under which the European Court of Human Rights considers the conduct of the national authorities to be compatible with the Convention.

1. Systematic Guiding Principles Derived from the Case-Law

1.1 Positive Obligation to Ensure Effective Protection

Competent authorities are required to take **all measures that may reasonably be expected of them to preserve, restore or reunite the relationship between parent and child**. The obligation is, in principle, an obligation as to means rather than results; however, the measures adopted must be appropriate, specific and effective.

1.2 Measures and the Speed of Their Implementation

The adequacy of State measures is also assessed by reference to **the speed with which they are implemented**. In family cases, delay may consolidate an existing factual situation, estrange the child from a parent and ultimately render the final judicial decision devoid of practical effect.

1.3 The Child's Views: Meaningful Participation, Not an Automatic Veto

Recommendation CM/Rec(2025)4 is neither a judgment of the European Court of Human Rights nor an autonomous source of binding case-law. It nevertheless **constitutes a contemporary normative and interpretative framework of the Council of Europe**, complementing the interpretation of principles developed through the Court's case-law.

It is a Recommendation of the Committee of Ministers of the Council of Europe concerning the protection of the rights and best interests of the child in parental separation proceedings. It provides for a genuine and effective opportunity for the child to express his or her views, **without a rigid age threshold**, with appropriate professional support and with due weight being given to those views according to the child's maturity.

The Recommendation further clarifies that the child's views are an important factor but **do not automatically determine the outcome**. The judicial decision should explain how the child's views were obtained and what weight was attached to them.

The same Recommendation requires proceedings to be initiated and monitored with **exceptional diligence**, decisions to provide transparent reasoning as to how the child's best interests have been assessed and balanced, and such decisions to be implemented or enforced in a timely and child-friendly manner.

Accordingly, the child's participation is intrinsically linked to **the quality of judicial reasoning, the speed of the proceedings and effective enforcement**.

The views of the child must be given weight according to the child's age and maturity. However, the authorities should also **examine the context in which those views were formed**, particularly where there are indications of a loyalty conflict, fear, manipulation or previous violence, with the assistance of an appropriate interdisciplinary team.

1.4 Effective Enforcement and Lack of Cooperation

A lack of cooperation between parents or third parties is not sufficient to justify State inaction. The competent authorities should combine **social and psychological support, targeted social and therapeutic interventions, monitoring compliance and sanctions against the obstructing adult**.

1.5 Best Interests of the Child and Protection from Risk

Preserving the parent-child bond is, as a rule, in the child's best interests. However, this consideration does not prevail where contact threatens the child's **health, safety or development**. Allegations of violence require an **independent and comprehensive risk assessment**, rather than a stereotypical or formulaic approach.

1.6 Quantity and Quality of Contact

The formal existence of some degree of contact is not sufficient. The **duration and frequency of contact, overnight stays and holiday periods** must be assessed on an individual basis as elements capable of enabling the development of a genuine and meaningful parent-child relationship.

1.7 Fair and Participatory Proceedings

Parents must be able to participate meaningfully in the proceedings and have **effective access to the relevant social and psychiatric reports concerning them**. Expert assessments must be completed, and judicial decisions must be based on **up-to-date, high-quality and individualised evidence**. A refusal to disclose such information requires specific and substantive reasoning based on compelling grounds.

1.8 European Normative and Interpretative Framework

The guiding principles derived from the case-law should be read in conjunction with the following European instruments and sources:

- **Recommendation CM/Rec(2025)4:** provides a common framework concerning the best interests of the child in parental separation proceedings, the involvement of an interdisciplinary team, the child's right to information and to be heard, timely proceedings, clear reasoning and effective enforcement.
- **Resolution 2079 (2015) of the Parliamentary Assembly of the Council of Europe**: addresses equality and shared parental responsibility, the possibility of shared residence according to the needs and best interests of the child, the child's right to be heard, and the full implementation of decisions concerning residence and contact.
- **Handbook on European law relating to the rights of the child, 2022 edition**, **by the European Union Agency for Fundamental Rights (FRA) and the Council of Europe**: systematises the child's right to express his or her views freely and the requirement that those views be given due weight according to the child's age and maturity. The document attached to the original study corresponds to the first 2015/2016 edition and is used as an earlier official edition.
- **Council Regulation (EC) No 2201/2003 (Brussels IIa):** governed jurisdiction and the recognition and enforcement of judgments in matrimonial matters and matters of parental responsibility, including custody and rights of access. For proceedings instituted from **1 August 2022**, it has been replaced by Council Regulation (EU) 2019/1111 (Brussels IIb).

2. Greek Cases Concerning Family Matters

The consolidated body of material examined in this study includes the following cases that are directly or complementarily connected with family life, parental responsibility, parent-child contact, the child's right to be heard or the length of the relevant proceedings:

- **Kosmopoulou v. Greece (2004):** violation of Article 8 due to the absence of adequate substantive measures and procedural safeguards concerning parent-child contact.
- **Tsourlakis v. Greece (2009):** violation of Article 8 because of the essentially unreasoned refusal to grant the father access to a crucial social investigation report. A genuine and accessible procedure for obtaining relevant information is required.
- **Syngelidis v. Greece (2010):** violation of Article 6 § 1, in a case arising in a family context, because the applicant was prevented from pursuing judicial proceedings as a result of parliamentary immunity.
- **Fourkiotis v. Greece (2016):** violation of Article 8 due to the absence of prompt and practical measures aimed at restoring the parent-child relationship. A parent's failure to cooperate does not release the State from its obligations, and supportive and therapeutic interventions should be pursued as a priority.
- **M.K. v. Greece (2018):** a case concerning an international family dispute and the protection of the child, which is relevant to the procedural balancing of the interests involved and the need for a prompt determination.
- **Anagnostakis and Others v. Greece (2021):** a violation in proceedings concerning family matters, with particular emphasis on their length and the need for effective protection.
- **Katsikeros v. Greece (2022):** no violation. The European Court of Human Rights held that the restrictions placed on contact were based on relevant and sufficient reasons and remained within the State's margin of appreciation.
- **Paparrigopoulos v. Greece (2022):** a violation concerning parental responsibility and the difference in the father's legal position in relation to a child born outside marriage.
- **I.S. v. Greece (2023):** violation of Article 8 due to inadequate measures for implementing contact arrangements and restoring the parent-child relationship.
- **Anagnostakis v. Greece (2023):** a more recent judgment forming part of the continuing concerns regarding the length of proceedings and effective judicial protection.
- **Giannakopoulos v. Greece (2024):** a related Greek case included in the consolidated material and used in the thematic assessment of family proceedings.
- **Tzioumaka v. Greece (2024):** a judgment concerning family matters that reinforces the need for comprehensive procedural safeguards and the effective hearing of the child.
- **M.P. and Others v. Greece (2025):** the return of two children to the United States in the context of international child abduction proceedings. The Court held, among other considerations, that the Greek courts were required to examine whether the children should be heard, even in the absence of an express request by the parties, and that the authorities had not used all the means available to them.
- **Doulgerakis v. Greece (2026):** a more recent Greek judgment included in the material and forming part of the overall assessment of recurring risks.

The above list does not equate the subject matter or outcome of all the cases. It preserves the distinction between findings of a violation and findings of no violation.

The Recurrence of Greek Cases

The particular significance of the Greek case-law examined in this study does not arise solely from the number of relevant cases. It lies primarily in the **recurrence, across different periods, of related problems concerning the effective protection of family life**. The judgments do not reveal only one form of malfunction. Instead, they highlight issues relating, among other matters, to:

- the speed of proceedings;
- the effective enforcement of judicial decisions;

- the preservation and restoration of family ties;
- procedural safeguards; and
- the effective protection of the parent-child relationship.

The recurrence of the Greek cases over time and their thematic convergence therefore provide a serious indication that the issue should not be assessed exclusively as the cumulative result of isolated judicial failings. **They justify a systematic examination of whether recurring deficiencies exist within the mechanism for protecting family life and, consequently, whether broader institutional measures of prevention and compliance are required to address this recurring pattern**.

3. Supplementary Case-Law

3.1 Expeditious Proceedings, Enforcement and the Prevention of Fait Accompli across the Case-Law

Shaw, Veres, Zavridou, Anagnostakis and Others (2021), Tzioumaka and Doulgerakis confirm that the passage of time is not neutral. Delay may alter the realities of family life, consolidate the child's estrangement from a parent and ultimately deprive judicial protection of any practical effect. Doulgerakis further establishes a specific obligation to ensure the effective judicial supervision of expert assessments

3.2 The Child's Views and Their Limits

M.K., Anagnostakis (2024), Zavridou, Sahin and X and Others v. Slovenia demonstrate that the child's views must be given serious consideration in accordance with the child's age and maturity. Those views, however, must not be applied mechanically. A distinction must be drawn between the settled wishes of a mature child and a refusal that may have been shaped by conflict, external influence or alienating behavior Where the child is not heard directly, the child's interests must be represented in an appropriate and impartial manner.

3.3 International Child Abduction: Expeditious but Not Mechanical Decision-Making

X v. Latvia, Shaw, Veres and M.K. highlight the dual requirement of expeditious proceedings and an individualised examination. The urgent return of a minor child does not release the court from its obligation to conduct a substantive examination of a substantiated allegation of grave risk. At the same time, delays attributed to the State must not allow the passage of time to create a new fait accomplishments.

3.4 Equal Treatment and the Prohibition of Stereotyping

Sahin, Paparrigopoulos and X v. Poland confirm that family status, sex, sexual orientation or stereotypes concerning family models cannot replace an individualised assessment of the best interests of the child concerned.

3.5 Proportionality of Measures in Cases of Alienation

X and Others v. Slovenia acknowledges that alienating behaviour may cause serious harm. Nevertheless, it rejects an automatic recourse to the forcible removal of the child or to the complete termination of contact. Authorities must first consider:

- less restrictive measures;

- preparatory support;
- a specific implementation plan; and
- regular review of the measures adopted.

4. Broader Evidence on the Functioning of the Greek System

4.1 ECHR Annual Review for 2020

The data record **18 judgments finding violations against Greece in 2020**, placing the country **10th among the 47 Council of Europe member States** and **5th among European Union Member States**. The main categories concerned **Article 6 of the Convention and the failure to enforce judgments, Article 13, and the protection of property**. Although these data do not exclusively concern family disputes, they support the argument that delays and the ineffective enforcement of judgments constitute a broader administrative and judicial weakness.

4.2 Observations of the Greek National Commission for Human Rights on the 2008 UN Report

The observations of the Greek National Commission for Human Rights on Greece's third periodic report concerning the implementation of the United Nations Convention on the Rights of the Child recorded that, as early as 2008:

- the **National Action Plan for the Rights of the Child** remained at the drafting stage;
- a national child health register had not been established;
- the provisions requiring the child's views to be obtained before decisions on parental responsibility were taken had not been implemented;
- there was a need to establish family courts and to make operational the social service provided for by **Law No. 2447/1996**; and
- all forms of violence against children needed to be addressed, while appropriate training was required for every professional group meeting children.

These observations predate several of the judgments finding violations against Greece. They demonstrate that critical requirements of child-centred justice, specialist services, the child's right to be heard and professional training had already been institutionally identified by 2008, without appropriate measures being taken in a timely manner.

4.3 The 2024 Picture and the Recurrence of Violations

The 2025 review records **25 judgments concerning Greece in which the European Court of Human Rights found at least one violation in 2024**. It emphasises that the central issue is the recurrence of the same categories of violations, particularly delays and insufficient effectiveness.

4.4 Comparative Picture of Greece: 2020 and 2024

The annual review for 2020 refers to **25 judgments concerning Greece**, of which **18 are described as judgments** finding violations and five as judgments finding no violation. It places Greece **10th among 47**

Council of Europe member States, in terms of judgments finding violations against the country, and **5th among European Union Member States**. The study also refers to:

- 43 judgments finding violations in 2015;
- 16 in 2023; and
- 25 in 2024.

More significant than the absolute number is the recurrence of the same categories of violations. The principal findings concern Article 6, the failure to enforce judgments, Article 13 and the protection of property.

Year	Reported figure	Council of Europe ranking	EU ranking	Relevance to the study
2020	18 judgments finding violations	10th of 47	5η	Broader weakness regarding access to a fair trial, an effective remedy and the enforcement of judgments
2024	25 judgments finding at least one violation	9th of 46	Approximately 5th	Indication of a renewed upward trend and the recurrence of the same categories of violations

4.5 Contribution of the Study by Despoina Papalexandrou

The study entitled Remedial Measures for Violations of the ECHR provides an appropriate framework for moving from a finding of a violation to compliance. It summarises the State's obligations following an adverse judgment. The State must pursue:

- **General measures**: legislative amendments, changes in judicial or administrative practice, interpretation consistent with the Convention, and dissemination of the judgment to the competent authorities.
- **Measures going beyond monetary compensation**: monetary compensation is subsidiary and is not sufficient where the source of the violation continues to exist.
- **Preventive integration of ECHR case-law**: national judges must incorporate the evolving case-law of the European Court of Human Rights in a timely manner.
- **Expeditious determination of family disputes**: because family disputes involve particularly significant interests, they must be determined as rapidly as possible.

Application to Family Cases: Where the passage of time has severed a family bond, compensation alone cannot restore the family life that has been lost. Measures must therefore address the recurring causes of violations:

- delay;
- inadequate enforcement;
- failure to complete assessments; and
- lack of coordination among the authorities and services involved.

4.6 Assessment of ECHR Case-Law Concerning Greece in 2025

The Justice Watch report for 2025 records:

- **19 judgments finding violations against Greece**;
- **2,500 pending applications at the end of 2025**; and
- a consistent profile of recurring violations.

In relation to **Article 8**, the report refers to a range of **8 to 10% within the pattern observed during the 2020–2025 period**. It also identifies delays, the failure to enforce judicial decisions and the recurrence of structural problems as persistent characteristics. These data are used in the study as part of the **general institutional context**. They do not establish that all findings of violations against Greece in 2025 concerned family life.

5. From Case-Law to Institutional Reality: Converging Evidence of a Deficit in the Effective Protection of Children's Family Life in Greece

5.1 From Formal Recognition to Practical and Effective Protection

The protection of family life under Article 8 of the European Convention on Human Rights is not exhausted by legislative action on the part of the State. As demonstrated by the case-law examined in this study, the operative provisions of the judgments also give rise to positive obligations incumbent upon the State authorities. Depending on the circumstances of each case, those obligations require the adoption of practical and effective measures to preserve or restore the family relationship.

In cases involving children, this obligation assumes particular importance. The passage of time may substantially alter the factual situation and make the restoration of a disrupted parent-child relationship extremely difficult or even impossible.

Against this background, **the critical question for Greece is not confined to whether the national legal order formally recognizes the child's right to family life. The decisive issue is whether the family justice system possesses the practical, scientific, organizational and supervisory mechanisms required to make that protection real, effective and capable of being evaluated in practice**.

5.2 Greek Cases before the European Court of Human Rights as Initial Evidence of Recurring Deficiencies

This study has already identified a series of judgments delivered by the European Court of Human Rights against Greece in cases concerning family life. Where different Greek cases, over an extended period, reveal problems falling within common functional categories, **there is a reasonable need to examine whether they represent exclusively isolated failures or indications of broader deficiencies in the mechanism for protecting family life**.

5.3 Judicial Practice following Law No. 4800/2021

An important contribution to the assessment of the implementation of the reform is the postgraduate research study by Thomas-Christos Efstathiou, entitled "*Case-Law Following Law No. 4800/2021 concerning the Joint Custody of Minor Children*." The study is based on a primary analysis of **431 judgments of the Single-Member Court of First Instance of Athens**, delivered in 2019, 2020, 2022 and 2023.

The research finds that, although sole custody was the prevailing arrangement until 2020 and was generally awarded to the mother, the entry into force of Law No. 4800/2021 was followed by initial indications of an

increase in joint custody arrangements, particularly through the functional allocation of parental responsibilities. **This development has not, however, resulted in a complete shift in judicial practice**.

The study also identifies **contradictions and ambiguities** in the gradual implementation of the new framework and concludes that the institutional change introduced by Law No. 4800/2021 has not yet been incorporated, to a significant extent, into judicial practice. This finding does not establish a violation of Article 8 of the Convention. Nor does it support the conclusion that an award of sole custody in a particular case necessarily contravenes the Convention. **It does, however, confirm the need for an empirical assessment of whether the normative changes introduced by the legislature are producing a corresponding practical effect in judicial application**. It therefore indicates a potential implementation gap between legislative reform and actual judicial practice, the precise extent of which requires systematic national monitoring.

5.4 Evidence from the Experiences of Persons Involved in the Family Justice System

A different but complementary level of evidence is provided by the postgraduate study conducted by Victoria Frizi within the Postgraduate Programme in Forensic Psychiatry of the School of Medicine of the National and Kapodistrian University of Athens. The research is qualitative and is based on semi-structured interviews and written testimonies provided by separated parents described as alienated and non-alienated.

According to the results presented, participants described as alienated parents reported disappointment with the legal system and characterised it as biased and ineffective in practice. The common findings also included:

- limited knowledge of the phenomenon; and
- a lack of specialist expertise in psychological and legal support.

The study concludes that, for the category examined, **the implementation of Law No. 4800/2021 remains incomplete**. It recommends further research, specialist training and the strengthening of the relevant support services.

Because of its qualitative nature and specialised subject matter, the study cannot be regarded as a representative measurement of the Greek family justice system as a whole. It nevertheless constitutes **additional evidence that assumes significance when considered not in isolation, but together with the research into judicial decisions and the case-law of the European Court of Human Rights**.

5.5 The Absence of Systematic Measurement of the Implementation of Rights

The collection and publication of data are matters of institutional importance. In its intervention of 14 July 2026 addressed to the Association of Judges and Prosecutors, A Child Needs 2 Parents highlighted the absence of aggregated data that would make it possible to determine, among other matters:

- how many parental responsibility cases are adjudicated;
- how many result in the award of sole day-to-day care;
- how many result in the practical exercise of joint parental responsibility;
- how frequently parenting time approaches or exceeds the statutory presumption of one third;
- how frequently the child is heard; and
- how frequently social, psychological or other interdisciplinary reports are used.

The request made by civil society acquired evidentiary significance following the official response issued by the Ministry of Justice on 14 October 2026.

In document No. 238 of 14 October 2026, issued following a request by the legal entity A Child Needs 2 Parents, the Ministry stated that JustStat processes statistical data relating to judicial activity, including family-law data. The Ministry also stated, however, that **the aggregated and separate collection and publication of data concerning parental responsibility, day-to-day care and contact decisions, broken down by year and court, are not currently possible**. The Ministry explained that the relevant information is contained within the text of the judgments and is not recorded as separate, structured fields in the Integrated Civil and Criminal Justice Case Management System. Consequently, the information cannot be extracted automatically.

This is a particularly important institutional finding. It **demonstrates a substantial limitation on the Greek State's ability to evaluate, through aggregated and structured data, specific outcomes produced by the operation of the family justice system.**

5.6 The Scale of the Issue and the "Knowledge Gap"

The significance of this limitation becomes even greater in the light of the same official response. The Ministry of Justice states that **73,582 family-law judgments were delivered during the period from 2021 to 2026**. It further states that a more specific analysis of those judgments would require:

- the systematic and detailed examination of a large number of judgments;
- special administrative authorisation; and
- substantial human and administrative resources.

An institutional contradiction therefore emerges: **the State generates a large volume of judicial decisions in the field of family law but does not currently have a structured mechanism allowing the automated extraction of specific outcomes concerning parental responsibility, day-to-day care and contact**. From this deficiency, it may be inferred that **the effectiveness of the reform cannot currently be comprehensively assessed based on corresponding aggregated, disaggregated and official data**.

This is critical from a public-policy perspective. The effective protection of a right requires not only legal rules and mechanisms for the administration of justice, **but also the capacity to identify deficiencies, evaluate outcomes and adopt corrective measures where necessary**.

5.7 The Child's Right to Be Heard

The problem is particularly apparent in relation to the participation of the child. Article 12 of the United Nations Convention on the Rights of the Child, read in conjunction with Article 3 § 1 of the same Convention, makes the child's participation a critical component of the decision-making process in matters affecting the child. The use of social, psychological or other interdisciplinary reports is also significant in this context.

This position is summarised in Recommendation CM/Rec(2025)4 of the Committee of Ministers of the Council of Europe, as already examined in Section 1.3 of this study. In this respect, it is not sufficient for the child's participation to be formally guaranteed at the normative level. **It must also be possible to assess whether, how frequently and in what manner that guarantee is implemented in day-to-day judicial practice**.

5.8 From Civil-Society Intervention to Parliamentary Scrutiny

The assessment of the implementation of family law has now moved beyond the intervention of a single civil-society organisation. Through Parliamentary Report No. 3250 of 31 August 2026, requests submitted by A Child Needs 2 Parents were referred to the Hellenic Parliament. These requests included:

- the publication of aggregated statistical data on the implementation of Law No. 4800/2021;
- a dedicated nationwide study of the judicial implementation of parental responsibility;
- the establishment of a monitoring mechanism;
- the initiation of an institutional dialogue; and
- the collection and publication, by JustStat or another competent body, of data concerning judicial decisions on parental responsibility, day-to-day care and contact.

The response that followed is therefore particularly significant. The Ministry of Justice did not confine itself to describing the current limitations affecting data collection.

The Ministry also stated that, as part of the evaluation of the changes to family law, it intends to establish a competent committee tasked with examining how the changes have been addressed and investigating problems arising from the implementation of Law No. 4800/2021, with a view to making the necessary adjustments to safeguard children's rights and their best interests. This statement constitutes **official recognition of the need for an institutional evaluation of the implementation of the reform**.

A critical question nevertheless arises concerning the feasibility of the announced evaluation itself. The Ministry of Justice acknowledges that it is currently impossible to undertake aggregated and disaggregated statistical monitoring of decisions concerning parental responsibility, day-to-day care and contact because this critical information is not recorded as structured fields in the courts' information systems. It is therefore reasonable to ask **on what empirical basis, according to which indicators and using what comparable data the implementation of Law No. 4800/2021 will be evaluated before any further legislative or institutional adjustments are considered**.

This question assumes particular importance because the Ministry itself states both that **73,582 family-law judgments were delivered between 2021 and 2026** and that extracting the specific information necessary for an evaluation would require the systematic and detailed examination of a large number of judicial decisions. **Consequently, before any substantive revision of the current framework, the necessary evidentiary foundation must logically and methodologically be established. This requires the collection and analysis of a representative body of case-law, the development of specific implementation indicators and an assessment of the reform's actual outcomes**. Otherwise, there is a risk of creating an"evaluation gap", in which an effort is made to correct or further amend a legislative framework without first establishing, through adequate empirical evidence, which problems arise from the normative framework itself and which arise from the manner in which it is implemented.

In this sense, the primary question for the announced committee is not only what should be changed. Before that question can be answered, it is necessary to establish:

- what actually occurred in the implementation of Law No. 4800/2021;
- how those outcomes can be demonstrated; and
- on the basis of which data they can be objectively evaluated.

The need for evaluation is therefore no longer raised exclusively by civil society. It has entered the sphere of parliamentary scrutiny and has been followed by an official governmental commitment to examine the matter.

5.9 The Broader Dimension: From Judicial to Administrative Implementation of Shared Parental Responsibility

Evidence of divergence between the normative framework and actual practice has not arisen only in relation to the courts. In its intervention of 3 July 2026, entitled"Institutional Divergence of Administrative Practice," A Child Needs 2 Parents identified implementation gaps in the existing legal framework for shared parental participation in areas including:

- the Independent Authority for Public Revenue;
- administrative acts concerning minors;
- education and healthcare services; and
- public-sector information systems.

Considered together with the remaining evidence, these findings indicate that the assessment of the effective protection of family life should not be confined to judicial proceedings. The broader institutional environment within which parental responsibility is exercised in practice following parental separation must also be examined.

5.10 Overall Assessment: From Individual Violations to the Identification of a Deficit in the Protection of Family Life

The overall picture emerging from the above supports a more substantial institutional finding. There is now converging evidence derived from different and methodologically independent categories of sources:

- The case-law of the European Court of Human Rights establishes requirements for effective, timely and procedurally adequate State protection of family life.
- Greek cases before the European Court of Human Rights have already revealed recurring categories of problems in matters concerning family life.
- An empirical study of 431 judicial decisions finds that the reform introduced by Law No. 4800/2021 has not yet produced a complete shift in previous judicial practice.
- Qualitative research records negative experiences of parents within the judicial system and highlights the need to strengthen specialist expertise and support services.
- The Greek State itself acknowledges that aggregated and disaggregated statistical monitoring of the outcomes of judicial decisions concerning parental responsibility, day-to-day care and contact is not currently possible.
- The Ministry of Justice states that it intends to establish a committee to evaluate the implementation of Law No. 4800/2021 and investigate the problems arising from its application.

In view of these findings, **the issue facing Greece can no longer be framed exclusively as a question of the adequacy of the legislation**. It must also be addressed as a question concerning:

- the effectiveness of implementation;
- the speed of proceedings;
- the enforcement of judgments;
- the quality of procedural protection;
- children's participation;
- interdisciplinary support; and
- ultimately, the State's capacity to monitor and evaluate the actual outcomes of the family justice system.

In the view of this study, the convergence of the above evidence justifies an investigation into whether there is a structural **deficit in effective protection between the formal recognition of the right to family life and the Greek system's practical ability to guarantee that right in a timely, effective, child-centred and accountable manner.**

The critical question is therefore no longer merely whether the Hellenic Republic recognises the child's right to family life in its legislation. The question is **whether the Hellenic Republic possesses a coherent system capable of guaranteeing the effective exercise of that right in practice while simultaneously measuring, evaluating and demonstrating the effectiveness of the protection provided**.

6. Conclusion

The judgments finding violations against Greece should not be examined as a series of unrelated incidents. The recurrence, over time, of related problems concerning the speed of proceedings, the enforcement of judgments and the effective protection of the parent-child relationship, combined with earlier institutional warnings, constitutes **serious and converging evidence of recurring dysfunctions that warrant a specific investigation into whether a structural deficit in effective protection exists**. Compliance, therefore, cannot be confined to the payment of compensation or the publication of individual judgments. It requires measures capable of addressing and preventing the causes underlying the recurrence of violations.

A critical component of such an approach is the State's own capacity to know, measure and evaluate what happens in practice. The inability to extract aggregated and disaggregated data concerning decisions on parental responsibility, day-to-day care and contact limits the possibility of objectively assessing the actual outcomes of the implementation of **Law No. 4800/2021**. For this reason, before any substantive revision of the existing framework is undertaken, an adequate evidentiary basis must be established, so that it is possible to distinguish between problems arising from the normative framework and those resulting from the way it is implemented.

The evaluation must be based on a representative body of case-law and measurable indicators, particularly in relation to:

- the speed of proceedings;
- effective enforcement;
- the child's right to be heard;
- interdisciplinary assessments;
- the investigation of risk or external influence; and
- the preservation or restoration of the parent-child relationship, where this is consistent with the best interests of the child.

The ultimate question, therefore, is not merely whether the Hellenic Republic safeguards the child's right to family life in its legislation. The question is whether it has a coherent, child-centred and accountable system that protects this right effectively in practice and is simultaneously capable of measuring and evaluating the outcomes of that protection.

The recurring nature of the problems identified requires a transition from the fragmented handling of individual cases to the systematic treatment of the underlying causes that may lead to new violations.

7. Compliance Measures Requested for Greece

In the light of **Article 46 of the European Convention on Human Rights,** and taking additionally into account the European normative framework for the rights of the child, particularly **Article 24 of the Charter of Fundamental Rights of the European Union** and, where applicable, **Regulation (EU) 2019/1111 ("Brussels IIb")** concerning the enforcement of judgments in family-law matters, the following measures are proposed:

1. National Action Plan for Family Justice: Cooperation between the Ministry of Justice, social services, the Ministry of Health, the police and local authorities, based on:

- clearly defined outcome indicators;
- a specific implementation timetable;
- a publicly available accountability report; and
- a clear allocation of responsibilities among the authorities and bodies involved.

2. Specialised Family Court Divisions and Social Services: As an institutional response to a need already identified in the 2008 observations, **specialized family divisions/courts should be established**, operating under consistent protocols, with specially trained judges and immediate support from child psychologists and social workers.

3. Uniform Protocol for Hearing the Child: A uniform protocol should be established for hearing the child, considering the child's **age and maturity**, without transferring the burden of the ultimate decision to the child. The context in which the child's views have been formed should also be examined, with the assistance of an **interdisciplinary team**.

4. Mandatory Training and Professional Education: Mandatory training should be provided for judges; prosecutors; lawyers; social workers; child psychologists; adult psychiatrists; police officers; and enforcement services.

5. Judicial Supervision Mechanism for Expert Assessments: A specific mechanism should be established for the judicial supervision of expert assessments, including deadlines for their completion; recording instances of inactivity or delay; and timely replacement of the appointed expert where the assessment is not completed. The parties must also have **timely and meaningful access to critical social and psychiatric reports concerning them**, unless specifically reasoned and compelling grounds justify restricting such access.

6. Practical Enforcement Plan for Every Contact Order: Every judicial decision governing parent-child contact should be accompanied by a practical implementation plan providing for a designated coordinator responsible for implementation; recording of unsuccessful contact attempts; a reasoned escalation of measures where necessary; and regular judicial review.

7. Exceptional-Diligence Protocol: Binding timeframes should be established for interim protection; expert assessments; hearing the child; judicial review; and enforcement. Where actual parent-child contact has been interrupted, an automatic urgent review should be triggered.

8. Proportionate Sanctions and Support: Priority should be given to supportive and **therapeutic measures**. However, where an adult systematically fails to comply with a binding judicial decision, effective and proportionate sanctions should also be applied.

9. Public Data System: An annual system for the publication of anonymised indicators should be established, including data concerning the duration of proceedings; the time required for interim measures to be issued; the rate of enforcement; the number of incomplete expert assessments; reviews of existing measures; and the outcomes of proceedings.

10. Evaluation of the Implementation of the Civil Code Reform under Law No. 4800/2021: An independent assessment of the actual implementation of Law No. 4800/2021 should be carried out, based on judicial data; the experiences of children and parents; an evaluation of the relevant services; and specific proposals for legislative or institutional amendments.

11. Individual and General Measures Following Each Judgment against Greece: For every judgment finding a violation against Greece, the State should clearly indicate what individual measures were taken in respect of the applicant; and what general measure was adopted to prevent the same type of violation from recurring. This approach would allow compliance to be assessed not merely in terms of compensation, but in terms of the practical prevention of future violations.

12. Preventive Integration of ECHR Case-Law: A dedicated case-law guide, professional training and reasoned reference to the principles developed by the European Court of Human Rights should be introduced so that those principles are applied before a new violation occurs. This should include mandatory continuous professional training and a case-law guide specifically addressing Article 8 ECHR; the State's positive obligations; the requirement of expedition in family proceedings; the child's right to be heard; violence and risk assessment; and the effective enforcement of judicial decisions.

8. Sources and Bibliography

This study is based on primary and secondary sources, including the case-law of the European Court of Human Rights, texts adopted by the Council of Europe and the European Union, international conventions, Greek institutional sources, and empirical or academic studies. The judgments of the European Court of Human Rights were primarily identified and verified through the official **HUDOC case-law database**.

8.1 Case-Law of the European Court of Human Rights

The judgments are listed in chronological order. The number provided is the application number before the European Court of Human Rights.

- Sahin v. Germany [GC], no. 30943/96, 8 July 2003.
- Kosmopoulou v. Greece, no. 60457/00, 5 February 2004.
- Tsourlakis v. Greece, no. 50796/07, 15 October 2009.
- Syngelidis v. Greece, no. 24895/07, 11 February 2010.
- Shaw v. Hungary, no. 6457/09, 26 October 2011.
- Y.C. v. the United Kingdom, no. 4547/10, 13 March 2012.
- X v. Latvia [GC], no. 27853/09, 26 November 2013.
- Kuppinger v. Germany, no. 62198/11, 15 January 2015.
- Ribić v. Croatia, no. 27148/12, 2 April 2015.
- Fourkiotis v. Greece, no. 74758/11, 16 June 2016.
- Giorgioni v. Italy, no. 43299/12, 15 September 2016.
- M.K. v. Greece, no. 51312/16, 1 February 2018.
- A.V. v. Slovenia, no. 878/13, 9 April 2019.
- Strand Lobben and Others v. Norway [GC], no. 37283/13, 10 September 2019.
- Jurišić v. Croatia, no. 29419/17, 16 January 2020.
- Nechay v. Russia, no. 40639/17, 25 May 2021.
- X v. Poland, no. 20741/10, 16 September 2021.
- Anagnostakis and Others v. Greece, no. 46075/16, 23 September 2021.
- Paparrigopoulos v. Greece, no. 61657/16, 30 June 2022.
- Katsikeros v. Greece, no. 2303/19, 21 July 2022.
- Popadić v. Serbia, no. 7833/12, 20 September 2022.
- Veres v. Spain, no. 57906/18, 8 November 2022.
- I.M. and Others v. Italy, no. 25426/20, 10 November 2022.
- M.H. v. Poland, no. 73247/14, 1 December 2022.
- Baškys v. Lithuania, no. 47410/20, 22 February 2023.
- E.K. v. Latvia, no. 14321/14, 13 April 2023.
- I.S. v. Greece, no. 19165/20, 23 May 2023.
- Anagnostakis v. Greece, no. 26504/20, 10 October 2023.
- Bîzdîga v. the Republic of Moldova, no. 15646/18, 17 October 2023.
- Luca v. the Republic of Moldova, no. 55351/17, 17 October 2023.
- A.S. and M.S. v. Italy, no. 48618/22, 19 October 2023.
- Tzioumaka v. Greece, no. 31022/20, 9 April 2024.
- Zavridou v. Cyprus, no. 14680/20, 8 October 2024.
- Giannakopoulos v. Greece, no. 20503/20, 3 December 2024.

- X and Others v. Slovenia, no. 27746/22, 19 December 2024.
- M.P. and Others v. Greece, no. 2068/24, 9 September 2025.
- Mamais v. Greece, no. 41542/19, 10 March 2026.
- Novák v. the Czech Republic, no. 6656/24, 9 April 2026.
- Doulgerakis v. Greece, no. 5769/19, 9 June 2026.
- Avetyan v. Armenia, no. 11997/25, 1 October 2026.
- L.Z. and D.Z. v. Italy, no. 27379/24, 8 October 2026

The official HUDOC database provides access to judgments, admissibility decisions, communicated cases and the Court's legal summaries.

8.2 Council of Europe Sources

- Committee of Ministers of the Council of Europe, Recommendation CM/Rec(2025)4 on the Protection of the Rights and Best Interests of the Child in Parental Separation Proceedings, 28 May 2025.
- Parliamentary Assembly of the Council of Europe, Resolution 2079 (2015), Equality and Shared Parental Responsibility: The Role of Fathers.
- Council of Europe and European Union Agency for Fundamental Rights, Handbook on European Law Relating to the Rights of the Child, 2022 edition.
- European Court of Human Rights, Annual Report 2020.
- European Court of Human Rights, Annual Report 2024.
- European Court of Human Rights, Analysis of Statistics 2024.

The European Court of Human Rights maintains a separate official section containing its annual and thematic statistics.

8.3 International and European Normative Framework

- European Convention on Human Rights, particularly Articles 6, 8, 13, 14 and 46.
- United Nations Convention on the Rights of the Child, particularly Articles 3, 9, 12 and 18.
- Charter of Fundamental Rights of the European Union, particularly Articles 7, 21, 24 and 47.
- Council Regulation (EC) No. 2201/2003 of 27 November 2003, concerning jurisdiction and the recognition and enforcement of judgments in matrimonial matters and matters of parental responsibility, known as Brussels IIa.
- Council Regulation (EU) 2019/1111 of 25 June 2019, concerning jurisdiction, the recognition and enforcement of decisions in matrimonial matters and matters of parental responsibility, and international child abduction, known as Brussels IIb.
- Hague Convention of 25 October 1980 on the Civil Aspects of International Child Abduction.

8.4 Greek Institutional and Legislative Sources

- Law No. 4800/2021, Reforms concerning relations between parents and children, other family-law matters and other urgent provisions.
- Law No. 2447/1996, concerning adoption, guardianship and foster care of minors, judicial assistance, the judicial guardianship of foreign affairs and related substantive, procedural and transitional provisions.

- Greek National Commission for Human Rights, Observations on the Third Periodic Report of the Hellenic Republic concerning the implementation of the United Nations Convention on the Rights of the Child, 2008.
- European Commission, Rule of Law Report: Country Chapter on Greece, 2026.
- European Commission, Rule of Law Report: Country Chapter on Greece, 2022.
- Hellenic Parliament, Parliamentary Report No. 3250/31.08.2026 concerning the evaluation and statistical monitoring of the implementation of Law No. 4800/2021.
- Ministry of Justice, document No. 238/14.10.2026, issued in response to a request from A Child Needs 2 Parents concerning the collection of data on family-law judgments and the evaluation of Law No. 4800/2021.
- A Child Needs 2 Parents, intervention addressed to the Association of Judges and Prosecutors concerning the evaluation of the implementation of Law No. 4800/2021, 14 July 2026.
- A Child Needs 2 Parents, Institutional Divergence of Administrative Practice from the Existing Framework of Shared Parental Responsibility, 3 July 2026.

8.5 Academic and Empirical Sources

- Despoina Papalexandrou, Remedial Measures for Violations of the ECHR, academic paper, 2023.
- Thomas-Christos Efstathiou, Case-Law Following Law No. 4800/2021 concerning the Joint Custody of Minor Children, postgraduate research dissertation. According to the information presented in the study, the dissertation analyses 431 judgments delivered by the Single-Member Court of First Instance of Athens in 2019, 2020, 2022 and 2023.
- Victoria Frizi, postgraduate dissertation completed within the Postgraduate Programme in Forensic Psychiatry of the School of Medicine of the National and Kapodistrian University of Athens, examining the experiences of alienated and non-alienated separated parents.
- Justice Watch, The Case-Law of the European Court of Human Rights concerning Greece in 2025, 2026.
- Journalistic analysis concerning recurring violations of the ECHR by Greece and the statistical picture for the period 2015–2024.

8.6 Note on the Use of Sources

The judgments of the European Court of Human Rights constitute the principal case-law basis of this study.

The recommendations, resolutions and handbooks of the Council of Europe are used as supplementary normative or interpretative sources. They are not treated as being equivalent, in terms of their legal force, to the binding judgments of the European Court of Human Rights.

Academic, empirical and journalistic sources are used to describe the broader institutional and factual context. They are not relied upon as independent proof of a violation of the European Convention on Human Rights.

9. Consolidated Chronological Table of Judgments

Date	Case	Country	Outcome	Key reason
08.07.2003	Sahin v. Germany 30943/96	Germany	Violation of Articles 14 and 8	Less favourable treatment of the father of a child born outside marriage.
05.02.2004	Kosmopoulou v. Greece 60457/00	**Greece**	Violation of Article 8	Inadequate measures and insufficient procedural protection of parent-child contact.
15.10.2009	Tsourlakis v. Greece 50796/07	**Greece**	Violation of Article 8	Unreasoned refusal of access to a crucial social investigation report and absence of a genuine and accessible information procedure.
11.02.2010	Syngelidis v. Greece 24895/07	**Greece**	Violation of Article 6 § 1	Exclusion from judicial proceedings because of parliamentary immunity.
26.10.2011	Shaw v. Hungary 6457/09	Hungary	Violation of Article 8	Delay and ineffective enforcement of the child's return and parent-child contact.
13.03.2012	Y.C. v. United Kingdom 4547/10	United Kingdom	No violation of Article 8	Adequate balancing of risk and the child's best interests before the making of a placement order.
26.11.2013	X v. Latvia 27853/09	Latvia	Violation of Article 8	Failure to conduct a substantive examination of a substantiated allegation of grave risk.
15.01.2015	Kuppinger v. Germany 62198/11	Germany	Violation	Inadequate and delayed enforcement of an interim contact order, insufficient sanctions and absence of an effective remedy capable of expediting the proceedings.
02.04.2015	Ribić v. Croatia 27148/12	Croatia	Violation	Proceedings and enforcement lasting several years, resulting in the loss of the parent-child relationship by the time the child reached adulthood.
16.06.2016	Fourkiotis v. Greece 74758/11	**Greece**	Violation of Article 8	Failure to take prompt and practical measures to restore contact. A parent's lack of cooperation did not release the State from its obligations.
15.09.2016	Giorgioni v. Italy 43299/12	Italy	Violation	Stereotypical and ineffective measures and tolerance of the obstruction of contact.
01.02.2018	M.K. v. Greece 51312/16	**Greece**	No violation of Article 8	Decisive weight attached to the wishes of a mature child and to the relationship between siblings.

09.04.2019	A.V. v. Slovenia 878/13	Slovenia	Violation	Inadequate professional support and failure to make use of family therapy before contact was terminated.
10.09.2019	Strand Lobben and Others v. Norway 37283/13	Norway	Violation of Article 8	Adoption without an adequate, up-to-date and rigorous assessment of the possibility of family reunification.
16.01.2020	Jurišić v. Croatia 29419/17	Croatia	Violation	Delayed response and consolidation of the child's estrangement despite existing contact orders.
25.05.2021	Nechay v. Russia 40639/17	Russia	Violation	Excessive restriction of contact to 12 hours per year in the presence of the mother.
16.09.2021	X v. Poland 20741/10	Poland	Violation of Articles 14 and 8	Discriminatory and stereotypical assessment of child custody.
23.09.2021	Anagnostakis and Others v. Greece 46075/16	**Greece**	Violation of Article 8	Excessive length of the proceedings concerning parent-child contact.
30.06.2022	Paparrigopoulos v. Greece 61657/16	**Greece**	Violation of Articles 14 and 8, and Article 8	Discrimination against an unmarried father and excessive length of proceedings.
21.07.2022	Katsikeros v. Greece 2303/19	**Greece**	No violation of Article 8	A gradual and properly reasoned contact arrangement that enabled the development of the parent-child relationship.
20.09.2022	Popadić v. Serbia 7833/12	Serbia	Violation	Delay lasting several years in expanding meaningful contact, including overnight stays and holiday periods.
08.11.2022	Veres v. Spain 57906/18	Spain	Violation of Article 8	Delay in the recognition and enforcement of a foreign judgment.
10.11.2022	I.M. and Others v. Italy 25426/20	Italy	Violation	Contact took place without the ordered protective setting and without an adequate assessment of the risk of violence.
01.12.2022	M.H. v. Poland 73247/14	Poland	Violation	Unjustified delay deprived the mother and the young child of additional family time.
22.02.2023	Baškys v. Lithuania 47410/20	Lithuania	No violation of Article 8	Despite limited contact, the authorities used specialist assistance, a neutral setting and sanctions.
13.04.2023	E.K. v. Latvia 14321/14	Latvia	Violation	Formalistic enforcement without examining the reasons for the child's refusal or adopting effective specialised measures.

23.05.2023	I.S. v. Greece 19165/20	**Greece**	Violation	Failure to complete or monitor assessments, official inactivity, delay and ineffective protection of parent-child contact.
10.10.2023	Anagnostakis v. Greece 26504/20	**Greece**	No violation of Article 8	The authorities were considered to have taken the measures that could reasonably be expected of them.
17.10.2023	Bîzdîga v. the Republic of Moldova 15646/18	Republic of Moldova	Violation	Proceedings restricting contact were neither fair nor expeditious, and the risk assessment was inadequate.
17.10.2023	Luca v. the Republic of Moldova 55351/17	Republic of Moldova	Violation	Failure to investigate the children's sudden refusal and delayed support for restoring the relationship in a context involving violence.
19.10.2023	A.S. and M.S. v. Italy 48618/22	Italy	Violation	Delays, inadequate protection of psychological integrity and tolerance of the breakdown of the family relationship.
09.04.2024	Tzioumaka v. Greece 31022/20	**Greece**	Violation of Article 8	Failure to enforce judicial decisions and consolidation of the child's estrangement.
08.10.2024	Zavridou v. Cyprus 14680/20	Cyprus	Violation of Article 8	Delayed intervention that was made dependent on the parties' cooperation.
03.12.2024	Giannakopoulos v. Greece 20503/20	**Greece**	Violation of Article 8	Properly reasoned determination of habitual residence and jurisdiction.
19.12.2024	X and Others v. Slovenia 27746/22	Slovenia	Violations of Articles 8 and 6	Disproportionate forcible removal, complete termination of contact and inadequate representation of the children.
09.09.2025	M.P. and Others v. Greece 2068/24	**Greece**	Violation of Article 8	Inadequate procedural examination of whether the children should be heard and failure to use all available means to exclude a grave risk before their return in international child-abduction proceedings.
10.03.2026	Mamais v. Greece 41542/19	**Greece**	Violation, outside the subject matter of this study	Administrative sanction following a final acquittal, engaging the ne bis in idem principle and the presumption of innocence.
09.04.2026	Novák v. the Czech Republic 6656/24	Czech Republic	Violation	Failure to restore the status quo promptly following an unlawful relocation, allowing a new factual situation to become established.
09.06.2026	Doulgerakis v. Greece 5769/19	**Greece**	Violation of Article 8	Delay in custody proceedings and inadequate judicial supervision of expert assessments.

01.10.2026	Avetyan v. Armenia 11997/25	Armenia	Violation	Formal but ineffective search and enforcement measures, absence of sanctions and delayed provision of information.
08.10.2026	L.Z. and D.Z. v. Italy 27379/24	Italy	Violation	Failure to enforce the child's return, inadequate coordination and creation of a fait accompli through the passage of time.

Note: The table records the judgments on which the study is based.

10. Overview of the Greek Cases

Case	Date	Outcome	Key reason
Kosmopoulou v. Greece, no. 60457/00	05.02.2004	Violation of Article 8	Inadequate substantive measures, suspension of contact without a hearing and delayed access to a crucial report.
Tsourlakis v. Greece, no. 50796/07	15.10.2009	Violation of Article 8	Unreasoned refusal of access to a crucial social investigation report and absence of a genuine and accessible information procedure.
Syngelidis v. Greece, no. 24895/07	11.02.2010	Violation of Article 6 § 1	Refusal to lift parliamentary immunity prevented access to specific judicial proceedings concerning non-compliance with a contact order.
Fourkiotis v. Greece, no. 74758/11	16.06.2016	Violation of Article 8	Failure to take prompt and practical measures to restore contact. A parent's lack of cooperation did not release the State from its obligations.
M.K. v. Greece, no. 51312/16	01.02.2018	No violation of Article 8	Decisive weight attached to the clearly expressed wishes of a mature child and to the relationship between siblings.
Anagnostakis and Others v. Greece, no. 46075/16	23.09.2021	Violation of Article 8	Excessive length of the contact proceedings and failure to act with exceptional diligence.
Paparrigopoulos v. Greece, no. 61657/16	30.06.2022	Violation of Articles 14 and 8, and Article 8	Discrimination against an unmarried father and proceedings lasting nine years and four months.
Katsikeros v. Greece, no. 2303/19	21.07.2022	No violation of Article 8	A gradual and properly reasoned contact arrangement.

I.S. v. Greece, no. 19165/20	23.05.2023	Violation of Article 8	Failure to complete or monitor assessments, official inactivity and ineffective protection of parent-child contact.
Anagnostakis v. Greece, no. 26504/20	10.10.2023	No violation of Article 8	The authorities were considered to have taken reasonable measures. Weight was also attached to the applicant's lack of participation.
Tzioumaka v. Greece, no. 31022/20	09.04.2024	Violation of Article 8	Failure to enforce custody decisions, delay and consolidation of de facto estrangement.
Giannakopoulos v. Greece, no. 20503/20	03.12.2024	No violation of Article 8	Properly reasoned determination of habitual residence and international jurisdiction.
M.P. and Others v. Greece, no. 2068/24	09.09.2025	Violation of Article 8	Inadequate procedural examination of whether the children should be heard and failure to use all available means to exclude a grave risk before their return in international child-abduction proceedings.
Doulgerakis v. Greece, no. 5769/19	09.06.2026	Violation of Article 8	Excessive length of the custody proceedings and inadequate supervision of expert assessments.