

CIVIL DISOBEDIENCE AND POLICE ACTIONS AGAINST PROTESTERS DURING THE PANDEMIC – THE CASE STUDY OF GREECE*

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Abstract. The global spread of the SARS-CoV-2 virus was announced by the World Health Organization in 2020, leading to a radical change in reality. Previous forms of social participation were significantly curtailed, and the quotidian routine was no longer able to function in its previous form. The mounting fear for health and life, rising mortality rates, and social chaos became the catalyst for countries to introduce compulsory isolation measures. This action generated strong and often extreme reactions from the population, particularly as the restrictions began to infringe upon fundamental rights, such as the right to freedom of association. This paper primarily aims to examine the actions of law enforcement agencies against protesters in Greece during the pandemic. Media reports and internal Greek regulations relating to the COVID-19 pandemic will serve as the reference point. This article aims to answer the question of whether the police response to protests during the pandemic was proportionate to the actions of demonstrators. A qualitative content analysis methodology was employed to provide a comprehensive interpretation of existing sources and draw key conclusions. This approach was adopted to analyse communications and announcements regarding the behaviour of protesters and law enforcement agencies during the study period.

Keywords: Greece, police, pandemic, protests, civil disobedience.

JEL Classification: H12, D74, K42, O52

1. Introduction

The radical measures that were introduced in Greece, among other countries, led to an increase in opposition to the restrictions. Consequently, contemporary response methodologies have increasingly encroached upon fundamental rights, notably those pertaining to freedom of religion, assembly, and movement (Karavokyris, 2020a). Police checks and the requirement to obtain authorisation to leave the house via text message (Ekathimerini, 2020) began to be regarded as an infringement on individual freedom and fundamental constitutional rights (Karavokyris, 2020b). Concurrently, there was a deterioration in the mental health of the population. The onset of depression and anxiety has been diagnosed with greater frequency than was previously the case (World Health Organisation, 2022).

The prohibition on the organisation of protests, as a measure to protect public health, is subject to

a requirement under international law for a case-by-case assessment of proportionality and legitimacy. Consequently, the authorities were compelled to explore alternative solutions that would facilitate the exercise of the right to peaceful assembly in conditions ensuring epidemiological safety (Marszałek-Kawa et al., 2023). In the case of Greece, however, such mechanisms were not implemented, and Prime Minister Kyriakos Mitsotakis introduced a series of legislative changes, often made overnight, which had a disruptive effect on communication with the public.

In fact, although the lockdown resulted in isolation, it did not put an end to the public's struggle to return to "normality". In order to express their opposition to the Greek government's abusive decisions, the public engaged in civil disobedience. These actions are not intended to circumvent general legal provisions or escalate the conflict into violent clashes between demonstrators and state authorities (Maron, 2022).

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Their objective is to pursue protests in a peaceful manner, with a view to achieving a better, more efficient and fairer perception of domestic policy by those in power (Rawls, 1994). However, it is crucial that all forms of civil disobedience are non-violent, as it is in these cases that the right to freedom of conscience, expression and peaceful assembly is applicable (Amnesty International, 2024).

2. Greek Law in the Context of Restrictions

Greece is a parliamentary republic, in which legislative power is exercised by the unicameral Parliament (Voulí ton Ellínón). The executive function is performed by the Prime Minister, who exerts direct control over the Council of Ministers. The judicial function is carried out by independent judges. The President is elected by Parliament for a five-year term.

The first reports of the spread of the COVID-19 virus in Greece date back to February 25, 2020 (Greek Herald, 2020). On that date, the law on emergency measures to prevent and limit the spread of the virus came into force (Stylianidis, 2021). The law focused on obligatory medical examinations, compulsory isolation and mandatory vaccinations, as well as references to the suspension of mass events (On emergency measures of prevention and limitation of the contagion of the coronavirus, 2020). The preventive measures adopted at that time enabled Greece to distinguish itself on the international stage as a country that dealt with the spread of the virus exemplarily (Vavoula, 2021). Given this, it was reasonable for the Greek government to focus its policy on minimising economic losses. In 2021, for example, the tourism sector accounted for around 19% of the country's total economy, generating profits of almost 6 trillion EUR (Insete, 2022). Consequently, it was not until March 18, 2020, that the Ministry of Development and Investment promulgated a decree mandating the closure of all catering establishments, cultural venues, and tourist attractions (Kondylis, 2020, p. 6).

Greece took swift action to implement restrictions in accordance with Article 44, which stipulates that "under extraordinary circumstances of an urgent and unforeseeable need, the President of the Republic may, upon the proposal of the Cabinet, issue acts of legislative content. Such acts are to be submitted to Parliament for ratification, as specified in the provisions of article 72 paragraph 1, within forty days of their issuance or within forty days from the convocation of a parliamentary session" (The Constitution of Greece, Article 44). The organisational framework of legislative acts enabled the government, and in particular specific ministers, to swiftly implement preventive measures. It is important to note, however, that these were not regulatory or administrative acts.

Consequently, any requests for their annulment before the Council of State were considered inadmissible (Kondylis, 2020, p. 5).

In the second and third phases of the COVID-19 pandemic, the Greek government implemented further radical restrictions with the aim of limiting demonstrations and strikes, as well as interference in socio-political activities (Chatzistavrou et al., 2025, p. 484). Nevertheless, freedom of association remains a fundamental principle of a democratic state governed by the rule of law. In accordance with the European Convention on Human Rights, the following principles are to be observed: "Everyone has the right to freedom of peaceful assembly and to freedom of association with others, including the right to form and to join trade unions for the protection of his interests" (European Convention on Human Rights). In view of the aforementioned points, law enforcement officers should facilitate the organisation of strikes, boycotts and related actions, provided that they do not compromise the democratic legal order and are consistent with epidemiological regulations.

As of 22 March 2020, a lockdown was implemented in Greece, the duration of which was contingent upon the phases of virus spread. Departure from one's place of residence was subject to the requirement of verifying the reason for departure (Tsourdi et al., 2021, p. 63). The form pertaining to the procedure for vacating the residence was completed in both paper and electronic formats. However, the authorised SMS system emerged as the most expeditious and convenient option for the general public. The concept allowed people to leave their place of residence for a specified period of time for the following purposes:

1. A previously scheduled visit to the doctor or pharmacy.
2. The necessity of grocery shopping.
3. Dealing with official matters, especially banking.
4. Providing support to people in need and caring for children in the context of their travel to educational institutions.
5. Attending a funeral or a legally mandated child visitation.
6. Engaging in physical activity with a maximum of two people, who must maintain a distance of 1.5 metres from each other (Ekathimerini, 2020).

However, this solution was perceived as overt surveillance of citizens. Although the intention was good, it significantly violated privacy. Societies that are isolated from the outside world and subjected to simultaneous surveillance mechanisms may experience increased pressure and anxiety (Gournellis et al., 2021, p. 2). Issues related to the processing of the personal data of individuals who used the above system were also considered. In fact, this information was not supposed to be archived by the government

and was supposed to be deleted after use. However, this rule was implemented through soft law, which is not legally binding (Tsourdi et al., 2021, pp. 67–68).

During the resurgence of pandemic-related deaths (Eurostat, 2024), the Greek government reintroduced restrictions on the right to assembly on July 9, 2020 in an attempt to minimise public gatherings (Hellenic Parliament, 2020). According to the updated provisions, "the organiser is required to inform the local police or coast guard of their intention to invite the general public, specific categories of persons or a specific number of participants to attend a public gathering in an open space, at a specific place and time" (Ministry of Citizen Protection, (n.d.)).

There were also doubts about Article 13 of the Act, which states that "the organiser of a public gathering in the open air shall be liable for compensation to persons who have suffered damage to life, health or property as a result of the actions of participants in the gathering". However, the organiser is exempt from this liability if they have registered the gathering in a timely manner and can prove that they have fulfilled their obligations (Hellenic Parliament, 2020, Article 13). Failure to comply with the law could prevent the demonstration from taking place and could also result in it being dispersed by the relevant law enforcement authorities. The legislator also provided for situations in which it is possible to completely ban an assembly, i.e., when:

- There is a real threat to public safety due to a high rate of serious crimes, especially those against life, health, property, and so forth.
- It caused serious disruption to social and economic life in the area.
- The assembly was incompatible with the objectives submitted to the relevant authorities (European Centre for Not-for-Profit Law, 2020).

However, it should be noted that awareness of a particular threat does not constitute sufficient grounds for prohibiting an assembly. The aforementioned legal construct proved to be more advantageous to the government than to the demonstrators (Marszalek-Kawa, 2023a). The regulations that were introduced were viewed negatively by the rest of society, particularly with regard to the sanctions imposed on the organiser and the procedure for banning gatherings, which violated the protection of the right of assembly (Stylianidou, 2020). Furthermore, concerns have been raised regarding the potential for abuse of power by officials.

3. Types of Protests Organised in Greece During the Pandemic

A holistic analysis of media reports indicates that the demonstrations in Greece were in response to government-imposed restrictions, as the government

recognised that frequent and numerous rallies could lead to the spread of the COVID-19 virus. The nature of the demonstrations depended on the restrictions imposed (Marszalek-Kawa, 2023b). Based on the analysed material, the following can be distinguished, among others:

- *Demonstrations in front of major government buildings*

Among others, trade unions and the Panhellenic Federation of Restaurant Owners and Related Professions organised a strike outside the Ministry of Finance's main building in Athens. They were expressing their opposition to the government's unfair decisions, particularly the restriction of access to restaurants, bars and shops for unvaccinated people (Anadolu Agency, 2021).

On August 26, 2021, more than 300 medical staff organised a rally outside the Ministry of Health headquarters in Athens to protest against the introduction of mandatory vaccinations for healthcare workers in both the private and public sectors (Becatoros, 2021a). According to the regulations, all individuals working in the healthcare sector, including nursing students, nursing home employees and doctors of various specialisms, were required to be vaccinated. Any delay would result in suspension from work without pay (Becatoros, 2021a).

Similar-scale protests by medical workers were organised on September 20 (Ekathimerini, 2021a), October 21 (Ekathimerini, 2021b) and November 3, 2021 (Ekathimerini, 2021c), in cities such as Thessaloniki, Heraklion, Volos, Patras, Drama, Corinth and Ioannina (Keep Talking Greece, 2021).

- *Economically motivated acts of civil disobedience combined with street protests*

Following the announcement of mandatory vaccinations for people over 60, who are considered to be at high risk, crowds gathered in the streets. Phrases such as "we are only doing this because they are holding a knife to our throats" could be heard among the crowd (ITV News, 2022). The document under consideration stipulates restrictions on individuals of senior age, and failure to comply with these restrictions is subject to criminal sanction (Lawspot, 2021). The funds obtained in this way were used to support the Greek healthcare system, which had suffered significantly with regard to staff and resources due to the number of infected people (BBC News, 2021). As part of their civil disobedience, senior citizens refused to pay the fines, and the very concept of compulsory vaccination was seen as undermining the democratic foundations of the state (Carassava, 2022).

Despite the restrictions imposed, sermons were held in churches from January 6, 2021 onwards, without adherence to the applicable restrictions. On Easter Sunday, 4 April 2021, in the town of Agrinio, adherents of the Christian faith convened to commemorate the Resurrection of Christ. The practice of receiving

Holy Communion without maintaining a safe distance from others, and the failure of the faithful to wear protective masks, have been observed (Politico, 2021).

– *Protests in cities, combined with street blockades*

The 17th of November 2020 marked another anniversary commemorating the 1973 uprising of Athenian students against the military junta (Right of Assembly, n.d.). In anticipation of the anniversary, the government promulgated stringent restrictions on social gatherings, permitting a maximum of three individuals. This was implemented with the assertion that the health service was under considerable strain (Becatoros, 2021b). Nevertheless, almost 2,000 demonstrators gathered outside the US Embassy and marched together to the centre of Athens. Notably, the protesters kept their distance and wore masks.

On February 10, 2021, a student demonstration was held to protest against the reforms introduced by the education bill, including the establishment of police forces on university campuses. The protest blocked Panepistimiou, Stadiou and Amalias streets (Wichmann, 2021).

– *Pickets*

On November 25, 2020, nine female activists gathered in Syntagma Square in central Athens to mark the International Day for the Elimination of Violence Against Women (Efsyn, 2020). Each woman was taken to Syntagma police station and fined €300 (Civicus Monitor, 2021a).

4. Police Response to Demonstrations

According to Prime Minister Kyriakos Mitsotakis's statement in Parliament on March 12, 2021, "police officers have an obligation to maintain self-control – even when they are insulted, even when they are physically attacked, and I think there are many cases of such assaults. They have a duty to follow the rules, even when the suspect refuses to do so. Nothing more, nothing less" (Prime Minister of Greece, 2021). Police officers are required to show respect for citizens during all types of interventions and preventive actions (Amrozy, 2022). During operations, their primary tasks are:

- "To be subject to the rules of constant readiness and continuous service in accordance with orders;
- Apply the law with social sensitivity and never exceed the permissible limits of discretion to which they are entitled. During interventions, they are required to disclose their function, identity and the unit in which they serve;
- Perform their duties impartially, objectively, transparently, with prudence, self-control, firmness, determination and dignity, protecting all citizens, without distinction, from illegal actions directed against them;

– Respect every person's right to life and personal safety. They shall not permit, cause or tolerate acts of torture, inhuman or degrading treatment or punishment, and shall report any human rights violations to the competent authorities" (Police Code of Ethics, Article 2).

In cases of protests relating to mandatory vaccinations for people in high-risk groups, police units were primarily responsible for verifying the validity of required vaccination certificates and imposing sanctions for their absence. Officers were also required to suppress demonstrations and strikes. If preventive measures proved ineffective, they were permitted to use direct coercion (Civicus Monitor, 2021a). The aforementioned case should be evaluated from not only a social perspective, but also from a moral and economic standpoint (Marszałek-Kawa et al., 2018). The minimum pension for Greek citizens is approximately 420 EUR (Ministry of Labor and Social Affairs, n.d.). Assuming that the financial penalty for non-compliance with the vaccination requirement was approximately 50 EUR, with an additional 1 00 EUR for each month of delay, it can be concluded that this amount is disproportionate to the income of senior citizens. This phenomenon can be interpreted as a manifestation of marginalisation experienced by individuals of post-working age. Anti-vaccination demonstrations in Athens, which attracted approximately 5,000 protesters, were suppressed by law enforcement using pepper spray (Gibbon, 2021).

In the case of the march commemorating the uprising at the University of Technology, the mobilisation of police officers was significant, with nearly 6,000 officers being deployed to disperse the protest. In light of the substantial turnout of demonstrators, tear gas and water cannons were employed to disperse the unarmed protest (Pietromarchi, 2020). It was also reported that officers used stun grenades in a manner that could lead to serious injuries, including hearing problems, as well as verbal abuse, for example: "Get down, you little whore, because this is your place and don't you ever get up again" (Amnesty International, 2021). It has been documented that a minimum of one hundred individuals were issued with financial penalties amounting to 300 EUR, while the organisers of the event were subject to fines ranging from 3,000 to 5,000 EUR (Mandrou, 2020).

The protests also served to highlight the conflict between police officers and journalists, who were subjected to particular acts of brutality. During the course of the protests, law enforcement officials engaged in a coordinated violation of the physical integrity of protestors (Civicus Monitor, 2021a). All individuals carrying photographic equipment were promptly apprehended by law enforcement officials and conspicuously pacified. In the most severe cases,

hospitalisation was necessary. One such case was that of Orestis Panagiotou, who was admitted to hospital with a suspected fracture following an incident involving a police water cannon (Civicus Monitor, 2021b).

Officers defined their attitude towards journalists according to the 2021 update to the Criminal Code, specifically Article 191, which refers to "false information". According to its wording "anyone who publicly or via the Internet disseminates in any way false news that may cause anxiety or fear among citizens or undermine public confidence in the national economy, the country's defence capabilities or public health, shall be punished with imprisonment of at least three months and a fine. If the act was committed repeatedly through the press or the Internet, the perpetrator shall be punished with imprisonment of at least six months and a fine. The same punishment shall also be imposed on the actual owner or publisher of the media through which the acts described in the previous paragraphs were committed" (Ministry of Justice, Greece, n.d.). The officers' coordinated actions were under strict government control. Marios Lолос, head of the reporters' union, emphasised that the police were responsible for almost all attacks on photojournalists covering the protests (Malichudis, 2021).

5. Conclusions

When interpreting phenomena related to civil disobedience, it is important to consider whether all

deliberate violations of the law can be classified as such. Following this line of reasoning, one might debate whether Edward Snowden's disclosure of American surveillance activities can be regarded as an act of civil disobedience (Pozen, 2019). Such reflections lay the groundwork for further discussions on the concept of civil disobedience, its determinants, its effectiveness, and how law enforcement agencies approach the measures implemented (Marszałek-Kawa et al., 2024).

Although the Greek government justified the legal regulations introduced to protect public health, in practice they led to measures that restricted the civil liberties of unvaccinated people. This situation has exacerbated the tension between the government and an increasingly frustrated society. Public opinion claimed that: "The Greek authorities used shocking tactics to try to scare women's rights activists, trade unionists, members of political parties, lawyers and others who were participating or called for participation in peaceful protests in November and December 2020 after the country entered its second lockdown. Many were arbitrarily arrested, criminalised and handed unjustified fines in a blatant abuse of power by authorities" (Amnesty International, 2021).

Police officers abused their powers by using excessive physical and psychological violence. They repeatedly violated human rights, thereby compromising their professional ethics. Their aggressive reactions were disproportionate to the actions of the public in the context of civil disobedience. These cases were not isolated and affected people of all ages, genders and backgrounds.

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