Employment Law Briefing: Special Edition

Law 5239/2025 on Fair Work for All: Simplifying Legislation – Supporting Workers – Protection in Practice

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A. Introduction

1. This Briefing provides an overview of the new Law 5239/2025 entitled Fair Work for All: Simplifying Legislation – Supporting Workers – Protection in Practice (the **Law**) which among others amends the Labor Code[1] by introducing significant reforms regarding working hours, overtime and flexible/rotational/part-time work arrangements.

2. The Law aims to modernize the regulatory framework, reduce administrative burdens and align national law with recently ratified ILO conventions.

B. Working Time & Overtime

1. The Law establishes a maximum daily working time of 13 hours by increasing the daily overtime cap from 3 to 4 hours, while the annual cap remains at 150 hours and defines the overtime pay

[1] Presidential Decree 62/2025.

at base wage plus 40% per hour of overtime worked.

2. Employees are now explicitly protected from dismissal or adverse treatment in case of refusal to work overtime beyond the legal limit.
3. The Law provides for the possibility of overtime in rotational work.
4. The framework for working-time adjustment is clarified: if no union, works council or association of persons exists, a bilateral written agreement between employer and employee is sufficient. Dismissal for refusal to accept such arrangements is prohibited.

C. Part-time / Rotational Work

1. Arrangements for part-time and rotational work must be in writing and submitted electronically.
2. Non-compliance with the statutory deadline for notification of the above arrangements results in a presumption of full-time employment, exposing employers to significant payroll obligations.
3. Rotational work (e.g. fewer days per week or months per year) is further regulated to ensure transparency and employee consent, with mandatory consultation from employee representatives where applicable.

D. Digital Work Card & Time Tracking

1. The Law specifies the time points for marking the digital card in companies and the preparation time for employees to begin or to leave work.
2. The Labor Inspectorate may impose administrative penalties for employment during the preparation period.
3. Flexible arrival windows (up to 120 minutes) and sector-specific prep time limits (30 or 10 minutes) are also introduced, requiring updates to time-tracking systems and policies.
4. Reductions in employee remuneration due to the implementation of the digital card system is now explicitly considered a prohibited unilateral detrimental change.

E. New System ERGANI II

1. The Law establishes the new system ERGANI II with the aim of abolishing the obligation to keep hard-copy employment documents in the workplace, as the relevant data will now be available in digital form.
2. The Law revises the procedure for announcing the commencement of work and changes in working terms in the ERGANI II system by abolishing the posting of basic working terms and written individual employee employment contracts.
3. The Law abolishes administrative penalties for employers who do not display personnel lists and work schedules.
4. ERGANI II enables employees to access all data relating to their employment relationship that is

kept on file in it.

5. ERGANI II enables employees to announce their voluntary resignation.
6. The new ERGANI mobile application enables employers to send a 'Digital Hiring Proposal' to prospective employees; once accepted by way of e-signature or through myErgani, this covers hiring, working time and termination notifications in a single step.
7. With the new mobile application, employers can fast-track the hiring process via mobile phone for up to two working days to meet urgent business needs.

F. Annual Leave & Family-Friendly Measures

1. Real-time electronic registration of annual leave will replace the January bulk filing and leave may be split into as many periods as the parties agree to.
2. Employees will be able to request that their leave be split into several periods throughout the year.
3. Employers must ensure their Human Resources Information System is integrated with ERGANI II for leave events.
4. Maternity protection from dismissal is extended to foster/adoptive mothers.
5. The maternal/parental-leave allowance becomes non-seizable, non-assignable and tax-free.
6. Maternity and childbirth benefits are paid also when the employee has changed employer or insurance provider, through the recognition of the single period of insurance.
7. A 4-day working week is introduced with full pay throughout the year and 10 working hours per day specifically for parents.

G. Violence & Harassment

1. Unification of mandatory anti-violence and harassment policies and complaint procedures for all employers with more than 20 employees.
2. A responsible reporting and confidentiality officer is required.

H. Health & Safety Modernization

1. The Law replaces the decade-old risk classification table with a dynamic list determined by Joint Ministerial Decision.
2. The role of the safety technician is strengthened, while minimum working time is established.
3. Enterprises with up to 20 employees may self-appoint a qualified safety technician only in low-risk sectors.
4. All written recommendations by safety technicians and occupational doctors must be logged electronically into the soon to be introduced HIRIDANOS information system.
5. The duty of employers to provide first aid training is reinforced.

I. Labor Inspectorate

1. The Bill strengthens the powers of the Inspectorate, as access to digital data is expected to enable the Inspectorate to intensify its controls, particularly with regard to overtime, the recording of leave and working time arrangements.
2. Inspectors are now provided with legal representation by the Legal Service of the Labor Inspectorate in the event of legal actions initiated against them for acts or omissions related to the performance of their duties.
3. The new regime for Inspectors' travel allowances (including a nautical mileage grid for island inspections) should encourage wider geographical coverage.
4. New tools and functions facilitating the audit of health and safety requirements are introduced for the Labor Inspectorate, including new industry risk classifications and e-logbook requirements.

J. Minimum Wage Process

1. The Law introduces a bi-annual review based on an assessment of economic and social data.
2. A specific framework for 2026-27 is provided for so that adjustments are aligned with EU obligations.
3. This is aimed at resulting in more predictable and potentially faster adjustments to the minimum wage.



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