

AN EQUINET GOOD PRACTICE GUIDE

ADVANCING EQUALITY BY MAKING POLICY RECOMMENDATIONS

Advancing Equality by Making Recommendations to Policy Makers is published by Equinet, the European Network of Equality Bodies.

Equinet brings together 42 organisations from 32 European countries which are empowered to counteract discrimination as national equality bodies across the range of grounds including age, disability, gender, race or ethnic origin, religion or belief, and sexual orientation. Equinet works to enable national equality bodies to achieve and exercise their full potential by sustaining and developing a network and a platform at European level.

Equinet members: Commissioner for the Protection from Discrimination, **Albania** | Ombud for Equal Treatment, **Austria** | Interfederal Centre for Equal Opportunities, **Belgium** | Institute for Equality between Women and Men, **Belgium** | Commission for Protection against Discrimination, **Bulgaria** | Office of the Ombudsman, **Croatia** | Ombudsperson for Gender Equality, **Croatia** | Office of the Commissioner for Administration (Ombudsman), **Cyprus** | Public Defender of Rights – Ombudsman, **Czech Republic** | Board of Equal Treatment, **Denmark** | Danish Institute for Human Rights, **Denmark** | Gender Equality and Equal Treatment Commissioner, **Estonia** | Ombudsman for Equality, **Finland** | Non-Discrimination Ombudsman, **Finland** | Commission for Protection against Discrimination, **Former Yugoslav Republic of Macedonia (FYROM)** | Defender of Rights, **France** | Federal Anti-Discrimination Agency, **Germany** | Greek Ombudsman, **Greece** | Equal Treatment Authority, **Hungary** | Office of the Commissioner for Fundamental Rights, **Hungary** | Irish Human Rights and Equality Commission, **Ireland** | National Office Against Racial Discrimination, **Italy** | National Equality Councillor, **Italy** | Office of the Ombudsman, **Latvia** | Office of the Equal Opportunities Ombudsperson, **Lithuania** | Centre for Equal Treatment, **Luxembourg** | National Commission for the Promotion of Equality, **Malta** | National Commission for Persons with Disability, **Malta** | Netherlands Institute for Human Rights, **Netherlands** | Equality and Anti-Discrimination Ombud, **Norway** | Human Rights Defender, **Poland** | Commissioner for Citizenship and Gender Equality, **Portugal** | Commission for Equality in Labour and Employment, **Portugal** | High Commission for Migration, **Portugal** | National Council for Combating Discrimination, **Romania** | Commissioner for Protection of Equality, **Serbia** | National Centre for Human Rights, **Slovakia** | Advocate of the Principle of Equality, **Slovenia** | Council for the Elimination of Ethnic or Racial Discrimination, **Spain** | Equality Ombudsman, **Sweden** | Equality and Human Rights Commission, **UK – Great Britain** | Equality Commission for Northern Ireland, **UK – Northern Ireland**

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0. Executive Summary

Equality Bodies have a statutory mandate to combat discrimination and promote equality. The EU Equal Treatment Directives¹ establish three areas of competence for national equality bodies: providing independent assistance to victims of discrimination, conducting independent surveys on discrimination, and publishing independent reports and making recommendations on any issue related to discrimination.

This Equinet Good Practice Guide focuses on the work of equality bodies in making recommendations to policy makers/legislators on general issues of discrimination and equal treatment. Making recommendations can be seen as an essential element contributing to the promotion of equal treatment, as foreseen in the EU equal treatment legislation. It is directly linked to the independence of equality bodies and requires a proactive stance in order to eliminate discriminatory practices by making suggestions on how these practices can be changed.

While research in this area is lacking, making recommendations to policy makers/legislators seems to be a tool widely used in the work of equality bodies. This good practice guide aims at providing a first analysis of the work and involvement of equality bodies in making recommendations and understanding which factors may empower or limit their potential in the field.

This guide draws on the experience of equality bodies in making recommendations suggesting measures to change discriminatory policies and practices. Moreover, it aims at providing equality bodies with good practices for their potential engagement as well as useful insights to help them defining, promoting and monitoring recommendations in a strategic way. In this context, the guide hopes to provide useful information to:

- Identify the problem;
- Define the potential contribution of the equality body;
- Work out the proposed solutions/recommendations;
- Promote the recommendation and get it implemented;
- Follow-up recommendations.

The information presented in this guide builds on the experience of one of the Belgian Equinet members, the Interfederal Centre for Equal Opportunities, and it is complemented by information and good practices collected through a survey of equality bodies. Equinet invited its members to complete this survey in order to gather information on their fact- and experience-based recommendations. Twenty five equality bodies from twenty one countries completed the questionnaire². Their responses helped us to identify a typology of tools used by equality bodies to make recommendations to policy makers/legislators, and to understand what made these recommendations effective, as well as the key difficulties and barriers in this work.

Starting from the analysis of the challenges, shortcomings and gaps in the implementation of equal treatment legislation, equality bodies can play an active role in alerting policy makers/legislators and the public opinion to the existence of discriminatory structures and

¹ Directive 2000/43/EC which prohibits discrimination on the ground of racial and ethnic origin; 2004/113/EC implementing the principle of equal treatment between men and women in the access to and supply of goods and services; 2006/54/EC on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation (recast).

² Austria, Belgium (2), Croatia (2), Cyprus, Czech Republic, France, Germany, Greece, Hungary (2), Ireland, Italy, Latvia, Luxembourg, Macedonia, Malta (2), Poland, Portugal, Slovakia, Slovenia, Sweden, UK Northern Ireland.

practices to make sure that adequate responses are developed to improve the situation and prevent future discrimination.

Examples shared by national equality bodies show that this tool can contribute to structural societal change and make equality a key value in the national legal framework; however, this guide can only be seen as indicative and point to the need for further inquiry and research. In light of the great potential of this tool, it is all the more important to dedicate more attention to it and to address the difficulties reported by equality bodies.

1. Introduction

Promoting equality is part of the core mandate of equality bodies, but they have different means to achieve this vast undertaking. Standards provided by the EU equal treatment legislation leave quite a lot of room for action to equality bodies; and the interpretations made at national level are very different from each other.

Making recommendations to policy makers/legislators is part of the promotion work of equality bodies. The issues at stake are twofold:

- The power of making recommendations to policy makers/legislators is directly linked to the **independence of equality bodies** from any political parties, governments and other stakeholders.
- Engaging in making recommendations to policy makers/legislators needs a **proactive stance from equality bodies**, as opposed to the reactive work of assisting victims of discrimination and monitoring cases.

1.1 Contributing to social, political and legal change by directly influencing the anti-discrimination legislative framework

Making recommendations to policy makers/legislators is a tool for equality bodies **to bring about legislative and policy changes**. It is a way to fill the protection gaps and to make sure that equality and anti-discrimination are protected and included as key principles in the national legal framework.

As a broader rationale, making recommendations to policy makers/legislators can be part of the general strategy of the equality bodies to promote equality and therefore, **to bring societal change** through the evolution of the legislative framework. Additionally, it is a crucial way of **building a culture of rights** by preventing discrimination.

1.2 Taking stock of the achievements made and providing equality bodies with good practices

In this good practice guide, we decided to **focus on recommendations made to policy makers/legislators on issues related to discrimination and equal treatment** and on the involvement of equality bodies in effectively influencing and enhancing the quality of policy-making and legislation with their fact- and experience-based recommendations. To ensure consistency of the analysis, recommendations in individual cases, judicial decisions and recommendations made to trade unions, companies and other private actors have been excluded from the field of research.

Research in this area is lacking. Therefore, the aim of this good practice guide is first to **take stock of the work which has been done by equality bodies** so far, and second to **provide equality bodies with good practices** to engage in such work or deepen their commitment.

1.3 Methodology

This good practice guide builds on the experience of one of the **Belgian Equinet members, the Interfederal Centre for Equal Opportunities**³. It is complemented by good practices shared by Equinet member equality bodies in a survey launched in spring 2014.

³ Formerly the Belgian Centre for Equal Opportunities and Opposition to Racism

Out of the 25 respondents to the survey, 23 declared having already made recommendations to policy makers/legislators. It shows that **this tool of promotion of equality is widely used** among the equality bodies that replied to the survey. Out of those 23 equality bodies, 22 declared that this task was part of their mandate. Furthermore, the respondents underlined that the ability to take action thanks to the mandate given to the equality body is one of the main reasons for making recommendations. This trend shows that **a specific mandate given by law to the equality body is necessary** for them to act in this area.

1.4 Key findings from the survey

1.4.1 Type of policy makers/legislators to which the recommendations were addressed

Equality bodies reported having made recommendations to:

- **National/Federal Governments or Ministries and National/Federal Parliaments.**
- **Regional/Local Governments and Regional/Local Parliaments.**
- **Public institutions and authorities.**

National/Federal Governments or Ministries and National/Federal Parliaments turned out to be the most targeted by equality bodies: 22 equality bodies out of 23 declared having issued recommendations to their respective national/federal Governments and Ministries, and 17 to their national/federal Parliaments. Those are followed by Regional/Local Governments and, to a lesser extent, Regional/Local Parliaments. Finally, 3 equality bodies respondent to the survey reported having made recommendations to public institutions and authorities such as, for instance, schools.

1.4.2 What made these recommendations effective?

According to the information shared by the equality bodies which replied to the survey, the recommendations they made were effective when:

- Preceded by **extensive background research** and **studies** into relevant issues regarding equality and discrimination. Studies are necessary to identify possible negative impacts or shortcomings in existing polices and legislation. Possible actions to remedy cases of discrimination are also of interest.
- Based on **detailed arguments**. Ideally, a good recommendation should be built up through different stages, starting with a general idea and ending with more specific technical formulations and indications about its implementation. It is important to deliver precise recommendations: the clearer the content of a recommendation, the easier it is for policy makers/legislators to follow indications and to take them into account.
- Based on **detailed facts** and **concrete experiences**. Facts and experiences can be gathered from citizens' complaints received by equality bodies, from victims' statements and from research and studies on problematic issues of discrimination.
- **Evidence** on the **potential benefits** and **value** of implementing them was provided.
- Followed by **monitoring mechanisms** established in order to monitor their correct implementation.
- Based on a **fruitful cooperation** between equality bodies and policy makers/legislators responsible for the implementation of the recommendations. **On-going engagement** and discussions with policy makers/legislators ensures a correct understanding of their respective work and priorities, and thus facilitate a tailored response and support. This may include the involvement of civil society, experts in the field and other stakeholders.
- Having generated a **public debate** and **interest** towards the issue in question.

1.4.3 Key difficulties and barriers in this work

A range of barriers and difficulties in the work of equality bodies in making recommendations can be identified. These may include:

- **Lack of engagement** and **political will** among policy makers/legislators in implementing the recommendations they receive. Some of them argue that the existing framework on equality and non-discrimination is satisfactory and does not require any further changes. Resistance may be encountered when recommendations entail additional costs. The economic crisis is in this respect often used as an excuse. It is a challenge to convince policy makers/legislators that measures against discrimination would be cost-effective.
- **Lack of interest** and **knowledge** about equality and non-discrimination among policy-makers, as well as understanding of the importance of equality and how it applies to a specific area or activity. Difficulties may be encountered when policy makers deem that equality bodies' recommendations are not pertinent to the area they are working on or equality considerations are not pertinent to the specific area of a particular policy.
- **No public interest** or strong public opinion. **Lack of education about the importance of anti-discrimination legislation and equality policies** among state administration and public opinion.
- **Lack of resources.** The implementation of a recommendation can require a long-term process to achieve necessary support and change. Human and financial resources are needed in order to continuously support the recommendation over multiple stages.
- **Lack of feedback** concerning the influence and the effectiveness of the recommendations.
- **Difficulty to access legislative and policy fora** and **to develop working relationships** with legislators and policy makers at national and regional levels which are necessary to ensure an on-going engagement.
- **Difficulty to monitor** the implementation of a recommendation.
- **Lack of consultation.** Equality bodies may not have been consulted or made aware at an early stage of the process of the preparation of a policy or law. As a consequence, their input comes at a moment when there is less opportunity to influence the policy-making process.
- **Lack of legal power.** While the equality body may have the mandate to make recommendations, the body to which recommendations are made may have no legal power and it may not be obliged to implement them.
- Making legislators and policy makers aware of the **importance of involving equality bodies**, which have direct access to victims of discrimination, in decision-making processes.

1.5 Structure of the guide

Experience from the Belgian Interfederal Centre for Equal Opportunities and respondents to the survey allowed us to build a typology of the different tools used by equality bodies to make recommendations to policy makers/legislators. This typology is preceded by the description of the "life cycle of a recommendation", which aims at providing insights into the ways to define, promote and monitor the implementation of recommendations.

2. Life Cycle of a Recommendation

2.1 Life of a recommendation: defining, promoting and monitoring implementation of recommendations as a time related process

Writing about good “practices” in making recommendations to legislators and policy makers requires a pragmatic and heuristic approach. The collection and description of good practices does not strive to offer a solution that fit all contexts but it hopes to provide useful insights to help define and adapt strategies pertinent to the concrete contexts in which these have to be deployed. Following the “life story” of recommendations provides a simple and efficient way of organizing the information about ways to define, promote and monitor recommendations.

2.2 Identifying the problem and defining the potential contribution of the equality body

At the source of a recommendation, there is always some kind of a diagnosis about a more or less *structural problem* that needs to be addressed in order to fight discrimination and/or enforce equality of rights and opportunities. It can either be a law that should be adopted or amended, an interpretation of a law that should be modified, a “policy” or a public or private “management decision” in any field that should be taken to address a discriminatory situation.

Equality bodies can arrive at the diagnosis in a number of different ways. Organizations treating individual complaints will identify in their case work, often by the repetition of similarities, interesting information about potentially problematic structural situations. However, the requests of advice by public authorities, court cases, the public debate in the media, scientific research and/or campaigns initiated by NGOs can also serve as the basis for such a diagnosis.

Accuracy is the key for this diagnosis: it needs to be as precise as possible and underpinned with qualitative and quantitative evidence. If that information is not available, then a first stage in the process should be implemented to find ways, partners and eventually a budget to gather the data and to analyze it. Working with all relevant stakeholders is a must as it contributes to the pertinence of the diagnosis by introducing practical, hands-on experience into it. Moreover, it also helps to start building up legitimacy and wider support for the future recommendation.

The Belgian Interfederal Centre for Equal Opportunities has initiated the *diversity barometers* in the field of employment and housing in order to identify and assess the extent of the different forms of discrimination which occur in both sectors. The *barometers* have been designed through a partnership involving public authorities and universities and have been conceived to be a permanent and structural tool to monitor the level of discrimination against and tolerance towards the groups protected by the Belgian antidiscrimination and equal treatment legislation. The *barometers* provide public authorities, NGOs and fieldworkers with quantitative and qualitative data on discrimination. Being a tool for scientific monitoring and assessment, *barometers* can be used to raise awareness among the general public, trade unions, employer federations and decision makers. A team within the Belgian Centre is developing an additional *barometer* in the field of education.

A first strategic analysis should be made at this stage: does the problem fall within the remit of the equality body, and, if yes, to what extent is the equality body able and willing to address it? Depending on the importance and scale of the problem, the priorities of the body, and the needed and the available means, the *level and type of involvement* of the equality body can be very diverse, ranging e.g. from writing a simple letter to a member of government, up to undertaking research and setting up a symposium about its conclusions.

2.3 Working out the proposed solutions / recommendations

Based on the diagnosis, the equality body can start to work out proposals for potential solutions to address the problems identified. These proposals can be considered as the key elements of the forthcoming recommendations. To be *pertinent, realistic and efficient*, they often need to be defined through multidisciplinary approaches and with the involvement of all stakeholders. It is only when the legal, sociological, psychological, managerial, financial, political and other implications of a potential solution have been examined - where possible in cooperation with the people and organisations at different levels of society that might be involved in the future implementation of these recommendations - that one can be sure that no important aspect or obstacle has been neglected⁴. Importantly, one does not have to wait until the proposed solutions are completely finalised to bring them into the public debate. On the contrary, one can start with a rather general and abstract hypothesis or question, e.g. “the law on leasing agreements should be adapted to reduce the possibility of discrimination of tenants of foreign origin”, and then put it forward to stakeholders’ networks for it to be discussed. The abstract idea should then evolve gradually towards more concrete and specific proposals.

In fact, the process of formulating good and strong recommendations is rather similar to the ideal legislative and policy-making processes in that it also needs to involve a careful assessment of potential impacts and it needs to be conducted in collaboration with all relevant and interested stakeholders. Given the different interests and needs of the various stakeholders, sometimes it is impossible to find one ideal and perfect solution to a problem. Choices will have to be made to find the best and most constructive from potentially imperfect and only partial solutions. In Belgium, for example, the current social and political debate concerning the authorization for public servants to wear ‘confessional signs’ such as Muslim veils, Sikh turbans or Jewish kippah fails to get a consensual solution. Therefore the Belgian Centre’s recommendations remain more methodological, focusing on the decision making process rather than on the content of the decision itself (e.g. *Is the decision making process transparent? Does it lead to accurate, adequate, necessary and proportionate solutions? Does the solution solve the initial problem? Which option would be less intrusive on individual freedom?*)

Once the ideal content of the recommendation is defined, on many occasions the equality body has to balance its work between the “progressive” content of its recommendation and what public opinion and decision makers are ready to accept at a certain moment. In certain cases the equality body might need to decide to include more “modest” goals in its recommendations and to keep the more ambitious goals on the table as a longer term perspective. It is important to take account of the political and societal environment to make and keep recommendations realistic.

Sometimes it can also happen that, despite the identified problem, it is just not yet the right time to seek change on a specific issue and public debate should be allowed to ripen. In those cases, the equality body could well define its role as a catalyst, continuing to raise awareness and enhance the content and quality of the public debate and ensuring that the aspects of equality and non-discrimination are brought into the discussions.

2.4 Promoting the recommendation and getting it implemented

Having defined its content, the fate of the recommendation will depend largely on the political and societal environment and the effectiveness of the efforts to promote the recommendation. It is certainly easier to ensure its adoption when the proposal is popular within public opinion and

⁴ As said before, this is only a heuristic description. There are many cases where the solutions to a problem of equal rights or opportunities are quite obvious and consensual among the stakeholders. In these cases, there is no need for very long debates, and one can go into finalizing proposals much faster.

subject of a wide societal consensus. As outlined above, the equality body can play an important role in raising awareness about the issues, thereby facilitating constructive discussions, convincing decision-makers of the importance of the recommendation and increasing the chances of reaching a consensus.

In promoting their recommendations, equality bodies can make good use of the example of many NGOs or even public bodies that, in the period leading up to the elections, prepare *memoranda* with recommendations. An example for this is the memorandum prepared by the Belgian Centre for Equal Opportunities and Opposition to Racism for the 2014 elections⁵. Another example is a Belgian LGBTI NGO that, before the elections in 2014, gave the opportunity to candidates to register on their website as supporters of the memorandum of the organisation⁶. As a result, the NGO now has the legitimacy to monitor the actions of the elected candidates with regard to their recommendations for the next five years.

After years of sensitizing and promoting new ideas, after many stakeholders have been involved in the public debate, when consensus has been built up and when politicians are convinced themselves that changing a law or a policy can be both socially (for the general interest) and politically (for themselves) profitable⁷, then the structural change could occur without noticing or remembering the very active role the equality body once played in bringing it to attention. Hence, promoting recommendations might demand a lot of involvement and energy on the one hand, and a lot of patience and humility on the other hand: there will be a lot of people at the end of the process to claim credits for the positive change achieved.

2.5 Following-up recommendations

If the efforts of the equality body and other stakeholders are successful, a recommendation will have been officially transmitted to the competent decision makers, attention will have been drawn to and kept on the issue, and some decisions will have been formally taken to enforce a structural change. The equality body could then celebrate the event, underline its importance and recall its role in the process for example with a press release.

However, the adoption of new practices, regulations, policies or laws is not the final step. It is crucial to check the implementation of these changes and their effects over a longer period by making a new assessment of the situation if and when necessary. In the ideal case, equality bodies can be directly and formally mandated to monitor, evaluate and report about the implementing decisions.

⁵ <http://www.diversite.be/elections-2014-memorandum>

⁶ <http://www.cavaria.be/nieuws/ondertekenaars-prioritaire-eisen-cavaria>

⁷ This is not a moral judgment: a politician in representative democracy cannot afford to neglect his chances to be reelected at the next elections, otherwise his “political life” being shortened and his place taken by another person. When a politician becomes “too progressive” with respect to public opinion, he seriously risks to stop being a politician with a mandate at all, and eventually spends the rest of his career in opposition.

3. Typology of Tools used by Equality Bodies to make Recommendations and Good Practice

Based on the experience of the Interfederal Centre for Equal Opportunities and the equality bodies which replied to the survey, we built a typology of tools used by equality bodies to make recommendations to policy makers/legislators. Each of the tools is illustrated by one or several concrete examples.

Typology of tools:

- a) Publications and research
- b) Comments on legislative acts
- c) Recommendations based on case work
- d) Articles in the media
- e) Formal written communication to the government
- f) Engaging in a consultation process with policy makers/legislators
- g) Bilateral meetings with policy makers
- h) Participation in committees of inquiry
- i) Annual report
- j) Memorandum for elections

a) Publications and research

Equality bodies can publish fact-based research to reflect the experiences of victims of discrimination. Several examples show that they can have significant impact on the legislative framework if they are accompanied by concrete recommendations to policy makers/legislators.

Human Rights Defender of Poland Publication on action strategy in an ageing society

Recommendation(s) made: In the context of the 2012 European Year for Active Ageing and Solidarity between Generations, the Human Rights Defender launched a publication relating to action strategies in an ageing society⁸. It was composed of articles by experts and concluded with policy recommendations.

Reaction from policy makers/legislators: Following the publication, the Polish Ministry of Labour and Social Policy has developed guidelines relating to policy for an ageing society. They were adopted by the Polish government at the end of 2013. A Department for Policies for an Ageing Society was also appointed.

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⁸ "Strategie działania w starzejącym się społeczeństwie - Tezy i rekomendacje", Human Rights Defender, 2012

Belgian Institute for the Equality of Women and Men Research on fatherhood at the workplace

Recommendation(s) made: In 2011, the Institute for Equality of Women and Men published research on fatherhood at the workplace and the regulation of paternity leave⁹. The project aimed at understanding the issues relating to paternity leave for employees and the way employers deal with paternity leave. It was concluded by several recommendations addressed to different stakeholders such as the Belgian Federal Legislator. Among them, the Institute underlined that the protection against dismissal during paternity leave in Belgium was lacking due to incorrect transposition of the Directive 2006/54 on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation.

Reactions from policy makers/legislators: The law of 11 June 2011 concerning the protection of paternity leave has been initiated by the Belgian Parliament. It protects employees by forbidding employers to terminate the contract during a period of 3 months starting on the date of the written notice to the employer. In case of non-compliance, the employer shall pay the employee a lump sum payment equivalent to three months salary.

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b) Comments on legislative acts

Comments on legislative acts are a direct tool to influence the decision making process. Examples show that equality bodies' recommendations to adopt or amend existing legislation can have a significant impact. In order for this tool to be effective, the equality body needs to receive all relevant legislative bills with sufficient time for making its assessment and, if necessary, recommendations.

Belgian Institute for Equality between Women and Men Comments on the Belgian Civil Code regulation on the transmission of family name to the child

Recommendation(s) made: On 13 June 2012, the Institute for Equality between Women and Men submitted comments on Article 335 of the Belgian Civil Code concerning the transmission of family name to the child. These comments were addressed to the Ministers of Justice and Equal Opportunities, the chairwoman of the Commission of Justice and the Advisory Committee on Equal Opportunities as well as to the delegates for the rights of the child. The Institute claimed that the Belgian law, which provided that every child would assume only his/her father's surname, was discriminatory on the ground of sex and violated the CEDAW Convention. It suggested to provide women with a more equitable legal position, through the adoption of a double surname system.

Reaction from policy makers/legislators: On 1 June 2014, a new law on the transmission of family name to the child was adopted¹⁰. It establishes a double surname system based on the

⁹ "Congé de paternité en Belgique: l'expérience des travailleurs", Institut pour l'Égalité des Femmes et des Hommes, 2011

¹⁰ [8 MAI 2014. — Loi modifiant le Code civil en vue d'instaurer l'égalité de l'homme et de la femme dans le mode de transmission du nom à l'enfant et à l'adopté](#)

consent of both parents. Parents can now decide to give the child either the surname of the father or the mother or both surnames in the order they choose.

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Belgian Institute for the Equality of Women and Men Recommendation to extend the scope of the Belgian law on combating discrimination between women and men

Recommendation(s) made: The Belgian Institute issued recommendations in order to extend the scope of the law on combating discrimination between women and men of 10 May 2007¹¹ by including gender identity and gender expression as grounds of discrimination. The Belgian Institute highlighted that the mentioned law only protected transgender people who officially had undergone, were undergoing or intended to undergo gender reassignment, and therefore leaving unprotected certain categories of transgender people. In this context, the Institute formulated recommendations addressed to the Ministers of Internal Affairs, Equal Opportunities and Justice.

Reaction from policy makers/legislators: On 22 May 2014, the Belgian Parliament adopted a new law¹² amending the law of 10 May 2007 and including gender identity and gender expression as grounds of discrimination. It entered into force on 3 August 2014 and provides transgender people with a more adequate protection against different forms of discrimination they face.

For further information: Charaz El Madiouni, charaz.elmadiouni@igvm.belgie.be

Croatian Ombudsperson for Gender Equality Recommendation on Croatian tax legislation

Recommendation(s) made: The Ombudsperson for Gender Equality made recommendations to the Croatian Parliament in relation to two laws regulating citizens' tax obligations and benefits¹³. The mentioned laws do not recognize the existence of the institution of a common-law partnership and therefore do not provide common-law partners with the same rights and tax benefits of married couples. The Ombudsperson issued its first recommendation in 2010 and its second in 2013 arguing that the provisions regulating tax benefits constituted a discrimination between married and common-law partners. The Ombudsperson suggested some changes in order to make them consistent with the Constitution and the Gender Equality Act.

Reaction from policy makers/legislators: While the first recommendation was rejected and the second one is still waiting for the Parliament's reaction, all other laws in Croatia have been adjusted and properly amended respecting equality between married couples and common-law partners: Inheritance Act (OG 48/03), Art. 8 (2); Homeland War Veterans Act (OG 174/04), Art. 6 (2); Pension Insurance Act (OG 130/10); Law on Maternity and Parental Benefits (OG 85/08, 110/08) Art. 5; Law on Medically Assisted Fertilization (OG 86/12) Art. 10 (1); Law on Protection from Domestic Violence (OG 137/09, 14/10, 60/10) Art. 3 (1) Para 1; Rulebook on

¹¹ [Loi tendant à lutter contre la discrimination entre les femmes et les hommes, 10 Mai 2007](#)

¹² [Loi 22 May 2014 modifiant la loi du 10 mai 2007 tendant à lutter contre la discrimination entre les femmes et les hommes en vue de l'étendre à l'identité de genre et l'expression de genre](#)

¹³ Law on Income Tax (Official Gazette: 177/04, 73/08, 80/10, 114/11, 22/12, 144/12, 125/13, 148/13) Art. 36 (7) and Law on Taxes on Real Estate Trade (Official Gazette: 69/97, 153/02, 22/11) Art. 13 (1) (1).

the rights, conditions and manner of exercising the right of compulsory health insurance (OG 67/09).

For further information: Nebojsa Paunovic, nebojsa.paunovic@prs.hr

c) Recommendations based on case work

Equality bodies can issue recommendations and base their arguments on the results of legal proceedings in cases of discrimination. The recommendations might be based on a single case or a series of cases indicating a systemic problem and barrier to equality.

Croatian Office of the Ombudsman

Recommendation on Minister of the Interior's Regulations on driving licenses

Recommendation(s) made: Following the result of a legal proceeding, the Office of the Ombudsman decided to make a recommendation to the Minister of the Interior regarding Regulations on driving licenses. Under these Regulations, the police had to issue a driving license containing a photo portraying the applicant without a head covering. Exceptions were allowed for older persons that wore a scarf or hat as an integral part of a traditional costume. The Office of the Ombudsman conducted a proceeding after having received a complaint from three young women of Muslim religion to whom the police had not issued driving licenses because of the headscarves they wore in their photos. At the end of the proceeding, the Office of the Ombudsman found that such regulations led to multiple discrimination on the grounds of religion and age.

Reaction from policy makers/legislators: The Minister of the Interior issued a new Regulation on driving licenses (NN 43/13) in line with the Ombudsman's recommendations. The new Regulation now includes provisions which allow the police to issue driving licenses containing photos of persons wearing head covering for religious or medical reasons.

For further Information: Silvija Trgovec Greif, Silvijatrgovec@obudsman.hr

d) Articles in the media

Publishing articles in the media allows equality bodies to give visibility to their recommendations by raising the awareness of the general public to certain anomalies within the legislation and policies and calling for action to remedy these.

Swedish Equality Ombudsman

Article about lack of regulation regarding reasonable accommodation

Recommendation(s) made: The Equality Ombudsman published articles in the Swedish media to underline the lack of protection in the Discrimination Act regarding reasonable accommodation. The Swedish Discrimination Act obliges employers to ensure reasonable accommodation to job seekers and employees with disabilities, and to a certain extent, higher education institutions have the same obligations. The Equality Ombudsman highlighted there were no such obligations to provide adjustments for reasonable accommodation within other areas.

Reaction from policy makers/legislators: Following the recommendation issued by the Swedish Equality Ombudsman, changes in the Discrimination Act has been introduced since 1 January 2015.

For further information: Kerstin Jansson, kerstin.jansson@do.se

e) Formal written communication to the government

Equality bodies can use formal written communication as a tool to forward recommendations to the government.

Swedish Equality Ombudsman Communication to appoint a committee of inquiry

Recommendation(s) made: In June 2012 the Equality Ombudsman sent a formal written communication to the government. It recommended appointing a committee of inquiry to investigate what should be done to increase the possibilities for individuals to assert their rights and for civil society organisations to carry out lawsuits in the field of discrimination.

Reaction from policy makers/legislators: An inquiry chair has been appointed by the government regarding both issues and other areas included in the Discrimination Act.

For further information: Kerstin Jansson, kerstin.jansson@do.se

f) Engaging in consultation process with policy makers/legislators

Equality bodies can influence the decision making process by engaging with policy makers/legislators in consultation processes, or by participating in consultation processes organised by public authorities.

Belgian Interfederal Centre for Equal Opportunities Consultation on the circular relating to the investigation and prosecution policy regarding discrimination and hate crimes

Recommendation(s) made: A consultation process between the Belgian Centre for Equal Opportunities and the Minister of Interior, the Minister of Justice, and the College of Public Prosecutors was launched after the adoption of the new Belgian antidiscrimination laws in 2007¹⁴. The consultation process led to the adoption of a joint circular¹⁵ that aimed at standardizing the investigation and prosecution policies on the basis of breaches of the Belgian legislation relating to discrimination and hate crimes (including gender-based discrimination). The objectives included a more efficient identification and registration of acts of discrimination and hate crimes, in an effort to combat underreporting; raising awareness among the magistrates in the public prosecutor's office, the labour auditor's office, the police and the social inspection services concerned regarding the problem and current legislation; a more efficient guidance in the investigation and prosecution of the offences concerned for magistrates and police officers in the field; the improvement in collaboration and reciprocal exchange between judicial staff and police officers and the Belgian Centre for Equal Opportunities¹⁶. The circular set a framework and a number of criteria for a homogenous development of the policy in the field. Contact magistrates and contact police officers should be appointed and collaborate with

¹⁴ Loi du 10 Mai 2007 tendant à lutter contre la discrimination entre les femmes et les hommes; loi du 10 Mai 2007 modifiant la loi du 31 Juillet 1981 tendant à réprimer certains actes inspirés par le racisme et la xénophobie ; loi du 10 Mai 2007 tendant à lutter contre certaines formes de discriminations.

¹⁵ [Joint Circular no. col 13/2013 of the Minister of Justice, the Minister of the Interior, and the College of Public Prosecutors to the Court of Appeal, 17 June 2013.](#)

¹⁶ *Ivi*, p. 3.

the Belgian Centre so as to ensure an exchange of useful information on the correct implementation of the circular.

Reaction from policy makers/legislators: Special contact magistrates and police officers have been appointed in order to improve the registration of discrimination offences and hate crimes, the follow-up of victims' complaints and the exchange of information on the implementation of the Belgian antidiscrimination legislation. However, the police services have not yet appointed a sufficient number of contact police officers. This may be explained by the lack of motivation in many police stations, where officers have become overwhelmed by the amount of administrative duties. As a next step, The Belgian Centre for Equal Opportunities will meet with the new Minister of Interior and the new Minister of Justice to discuss possible ways forward for improving the context.

For further information: Bruno Martens, Bruno.Martens@cntr.be

g) Bilateral meetings with policy makers

Several respondents underlined the effectiveness of organising bilateral meetings with policy makers to directly influence the decision-making process.

Maltese National Commission for the Promotion of Equality Encouraging ministries to mainstream gender in their work

Recommendation(s) made: As part of a set of initiatives¹⁷ on the promotion of the implementation of gender mainstreaming, the National Commission for the Promotion of Equality (NCPE) carried out a set of bilateral meetings in 2012, with representatives of all ministries to recommend them to mainstream gender in the policy areas covered by their respective departments and entities.

Reaction from policy makers/legislators: Following collaboration with the Office of the Prime Minister, the circular "[*Gender Mainstreaming in Practice*](#)¹⁸" was published to further encourage every ministry to implement gender mainstreaming in policy-making, law-making and project/programme creation processes. This circular calls for the reassertion of gender equality policies and gender mainstreaming in the performance reviews within the public administration and requires each department/entity to prepare a brief report on the measures taken and the progress achieved. This report should be forwarded to the NCPE on an annual basis.

For further information: Renee Laiviera, equality@gov.mt

h) Participation in committees of inquiry

Equality bodies can also bring their expertise in committees of inquiry organised by policy makers.

Swedish Equality Ombudsman The possibility to have a representative in committees of inquiry

Having a representative in different committees of inquiry gives the Equality Ombudsman the opportunity to participate in and influence the discussions and work of the committees. In this context, the Equality Ombudsman has the opportunity to put forward its opinions and influence

¹⁷ These initiatives were part of the EU co-funded project Gender Mainstreaming – In Practice VS /2010/0819

¹⁸ OPM Circular No.15/2012, gender Mainstreaming in Practice

the committee's work at an earlier stage in the process of formulating legal proposals and other measures. The Equality Ombudsman can bring its experiences and knowledge about discrimination issues to the table and hereby influence the committees' proposals.

For further information: Kerstin Jansson, kerstin.jansson@do.se

i) Annual Report

Equality bodies can include policy recommendations addressed to state bodies in their Annual Reports which are submitted to the Parliament.

Croatian Office of the Ombudsman Annual Report

Recommendation(s) made: The Office of the Ombudsman always issues in its Annual Report, which is discussed in the Croatian Parliament, a large number of wider/systemic policy recommendations addressed to state bodies, primarily to the state administration. These recommendations refer to key challenges and problems in the area of discrimination and equal treatment and suggest changes and improvements, including amending existing legislation or introducing different procedures with regard to specific legal acts or strategic documents.

Reaction from policy makers/legislators: The monitoring system that assesses the implementation of the recommendations contained in the Annual Report is conducted at government level. The Governmental Office for Human Rights and the Rights of National Minorities is obliged to monitor the implementation of the Ombudsman's recommendations, as well as to prepare a report on the implementation.

For further Information: Silvija Trgovec Greif, Silvijatrgovec@obudsman.hr

j) Memorandum for elections

In promoting their recommendations, equality bodies can make good use of the example of many NGOs or even public bodies that, in the period leading up to the elections, prepare *memoranda* with recommendations.

Belgian Interfederal Centre for Equal Opportunities Memorandum for 2014 elections

Recommendation(s) made: The Belgian Centre for Equal Opportunities prepared a [memorandum](#) and presented its priorities on the occasion of the federal, regional and European elections of 25 May 2014. The Centre collected the most important recommendations previously promoted for every relevant sector of society (employment, housing, education, healthcare) and/or discrimination grounds (nationality, ethnic origins, age, disability, gender, sexual orientation). The *memorandum* was sent to the leaders of political parties running for the elections as well as to their research centres. The aim was to make sure that at least some of those recommendations could be taken into account in the electoral programmes of political parties. The *memorandum* was also shared with relevant stakeholders' networks that usually prepare *memoranda*, and promoted by using press releases and through the Belgian Centre's website in order to allow voters, stakeholders and candidates to get inspiration and promote the recommendations within the political parties and during electoral debates. After the elections, a summary of the *memorandum* was sent to the elected politicians involved in negotiations to form governments.

Reaction from policy makers/legislators: The strategy of using a memorandum had a positive follow up as several recommendations were taken into account in the government agreements which were concluded at the end of the negotiations. During the next stage, the Centre will seek personal meetings with the new ministers to discuss the recommendations that fall under their specific portfolio.

For further information: Bruno Martens, Bruno.Martens@cntr.be

ANNEX: Template for Good Practice Guidance for equality bodies on advancing equality and supporting good practice by making recommendations to policy-makers

Dear Equinet Members,

We are starting the process of collecting contributions on effective approaches applied by equality bodies in advancing equality by making recommendations to policy makers and legislators on issues related to discrimination. This template is the first step towards Equinet's new good practice guide on making recommendations to policy-makers, whose publication is foreseen for the second half of 2014.

Thanks to this survey, we aim at collecting examples of good practices, but also, understanding the reasons why some equality bodies are less engaged in such work. Your contribution is therefore indispensable and highly valuable. To ensure a high-level quality of the final report, we also kindly ask you to provide as much detail as possible, including also the description of some examples. With this good practice guide, we aim at focusing specifically on recommendations addressed to policy-makers and legislators. Therefore, this consultation does not cover recommendations made to other types of actors such as individuals, private sectors organisation and services providers.

As a next step, the Equinet secretariat will analyse the contributions received and will ask one Equinet member organisation with effective action in this field to lead the work on the drafting of this case study, taking into account and referencing other good practice examples as appropriate and available. We will of course welcome any members proactively volunteering to lead on the drafting at the time of returning their template.

- **NAME OF YOUR ORGANISATION**
- **COUNTRY**
- **CONTACT PERSON - First name, Family Name, Position in the organisation, Email**
- **Does your mandate as equality body allow you to make recommendations to policy-makers?**

If no, please explain which specific provisions prevent you from making recommendations to policy-makers.

- **Has your organisation made recommendations to policy makers and legislators on issues relating to discrimination?**

YES

NO

CLICK ON "YES" -> OPENS THE FOLLOWING QUESTIONS

- **To which type of policy-makers/legislators were these recommendations addressed?**
(multiple answers are possible)
 - 0 National Government or Ministry
 - 0 National Parliament
 - 0 Regional/Local Government
 - 0 Regional/Local Parliament
 - 0 Others
- **Why did you decide to use the tool of making recommendations?**
- **Please indicate maximum 2-3 important examples of recommendations which your organisation has made to policy-makers/legislators on issues relating to discrimination. Please give details on the field (policy or legal), the recipient and the content of the recommendations.**
- **Have these recommendations been followed by a reaction of the targeted policy-makers? If yes, did these reactions match your expectations?**
- **What made these recommendations effective?**
- **What are the key-difficulties and barriers in this work?**
- **Any other comments you would like to add?**

CLICK ON "NO" -> OPENS THE FOLLOWING QUESTIONS

- **Why has your equality body never engaged in recommendations to policy-makers and legislators?**
- **Because of a lack of (human and financial) resources.**
 - 0 YES
 - 0 NO
- **Because it is not part of your strategic priorities, goals or role**
 - 0 YES
 - 0 NO
- **Because you think it is not efficient**
 - 0 YES
 - 0 NO
- **For another reason/other reasons (please specify)**
- **What would have to change for you to make recommendations to policy-makers?**
- **Any other comments you would like to add?**

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EQUINET MEMBER EQUALITY BODIES

ALBANIA

Commissioner for the Protection from Discrimination
www.kmd.al

AUSTRIA

Ombud for Equal Treatment
www.gleichbehandlungsanwaltschaft.at

BELGIUM

Interfederal Centre for Equal Opportunities
www.diversite.be and www.diversiteit.be

BELGIUM

Institute for the Equality of Women and Men
<http://igvm-iefh.belgium.be>

BULGARIA

Commission for Protection against Discrimination
www.kzd-nondiscrimination.com

CROATIA

Office of the Ombudsman
www.ombudsman.hr

CROATIA

Ombudsperson for Gender Equality
www.prs.hr

CYPRUS

Office of the Commissioner for Administration (Ombudsman)
www.ombudsman.gov.cy

CZECH REPUBLIC

Public Defender of Rights
www.ochrance.cz

DENMARK

Board of Equal Treatment
www.ast.dk

DENMARK

Danish Institute for Human Rights
www.humanrights.dk

ESTONIA

Gender Equality and Equal Treatment Commissioner
www.svv.ee

FINLAND

Ombudsman for Equality
www.fasa-arvo.fi

FINLAND

Non-Discrimination Ombudsman
www.ofm.fi

FRANCE

Defender of Rights
www.defenseurdesdroits.fr

GERMANY

Federal Anti-Discrimination Agency
www.antidiskriminierungsstelle.de

GREECE

Greek Ombudsman
www.synigoros.gr

HUNGARY

Equal Treatment Authority
www.egyenlobanasmod.hu

HUNGARY

Office of the Commissioner for Fundamental Rights
www.ajbh.hu

IRELAND

Irish Human Rights and Equality Commission
www.equality.ie

ITALY

National Office against Racial Discrimination - UNAR
www.unar.it

ITALY

National Equality Councilor
www.lavoro.gov.it/ConsiglieraNazionale/

LATVIA

Office of the Ombudsman
www.tiesibsargs.lv

LITHUANIA

Office of the Equal Opportunities Ombudsperson
www.lygybe.lt

LUXEMBURG

Centre for Equal Treatment
www.cet.lu

(FYRO) MACEDONIA

Commission for the Protection against Discrimination
www.kzd.mk/mk/

MALTA

National Commission for the Promotion of Equality
www.equality.gov.mt

MALTA

National Commission for Persons with Disability
www.knpd.org

NETHERLANDS

Netherlands Institute for Human Rights
www.mensenrechten.nl

NORWAY

Equality and Anti-Discrimination Ombud
www.ldo.no

POLAND

Human Rights Defender
www.rpo.gov.pl

PORTUGAL

Commission for Citizenship and Gender Equality
www.cig.gov.pt

PORTUGAL

Commission for Equality in Labour and Employment
www.cite.gov.pt

PORTUGAL

High Commission for Migration
www.acidi.gov.pt

ROMANIA

National Council for Combating Discrimination
www.cncd.org.ro

SERBIA

Commissioner for Protection of Equality
www.ravnopravnost.gov.rs

SLOVAKIA

National Centre for Human Rights
www.snsip.sk

SLOVENIA

Advocate of the Principle of Equality
www.zagovornik.net

SPAIN

Council for the Elimination of Ethnic or Racial Discrimination
www.igualdadyndiscriminacion.msssi.es/

SWEDEN

Equality Ombudsman
www.do.se

UNITED KINGDOM - GREAT BRITAIN

Equality and Human Rights Commission
www.equalityhumanrights.com

UNITED KINGDOM - NORTHERN IRELAND

Equality Commission for Northern Ireland
www.equalityni.org



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