

COMPENDIUM OF GOOD PRACTICES ON EQUALITY MAINSTREAMING

**THE USE OF EQUALITY DUTIES AND EQUALITY
IMPACT ASSESSMENTS**



2021

**EQUINET CLUSTER ON EQUALITY
MAINSTREAMING**



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**This designation is without prejudice to positions on status and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.*

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Executive Summary

Objective of Compendium

The objective of this Compendium is to collect the experience and expertise of national equality bodies (NEBs) on **equality duties** and **equality impact assessments** and use it to:

- ▶ inform the work of NEBs and relevant duty bearers, including public authorities and private actors;
- ▶ inform and generate discussions with, and action by, relevant stakeholders at the EU and national level; and
- ▶ increase awareness and use of these tools for equality mainstreaming.

Introduction: Background and Content of Compendium

In 2021, Equinet, the *European Network of National Equality Bodies*, established the **Cluster on Equality Mainstreaming**, a multi-annual, members-led project. For its first year, the Cluster focused on the use of **equality duties** and **equality impact assessments** for mainstreaming equality as these tools hold significant potential.

This *Compendium of Good Practices on Equality Mainstreaming* is the Cluster's main output in 2021. Through a survey conducted among its members in June 2021, Equinet collected good practices on their work on **equality duties** and **equality impact assessments**. All respondents were asked to specify if there was a legal mandate for their NEB to work or be involved in introducing, monitoring or enforcing equality duties and conducting equality impact assessments. Additionally, the survey asked what grounds and fields of life the practice covered. Notably, not all NEBs have this legal mandate, so in the absence of an explicit legal provision to work or be involved in equality duties and equality impact assessments, many NEBs interpret their mandate broadly to still be able to cover these areas on certain grounds and fields of life.

This Compendium groups the good practices into three sections:

1. **Equality Impact Assessments**
2. **Equality Duties**
3. **Additional supporting measures aimed at mainstreaming equality**

The first section focuses on **equality impact assessments**, which are defined as a systematic way of finding out whether a function, such as a policy or practice, is equality-compliant or if it has a disparate impact on particular communities, or groups within communities. Equality impact assessments can be used to determine disadvantage for any groups protected by equality legislation.

The second section collects good practices on **equality duties**, which are defined as positive legal obligations to promote equality and prevent discrimination, going beyond the general obligation to refrain from discrimination. Equinet's earlier study '[Making Europe More Equal: A Legal Duty?](#)', concluded that there are three main categories of statutory duties in place in Europe:

- ▶ **Preventive duties** are statutory duties on organisations (public and private) to take measures to prevent discrimination, harassment or sexual harassment in employment or in the provision of goods and services.
- ▶ **Institutional duties** are statutory duties on organisations (public and private) to promote equality for employees or for people accessing their services.
- ▶ **Mainstreaming duties** require public authorities to have due regard to the need to promote equality in carrying out their functions, including legislating, budgeting, regulating, and policy making.

The third section gathers other good practices related to **supporting the concept of equality mainstreaming** which do not fit within the definition provided for either equality duties or equality impact assessments. This category was included because both equality duties and equality impact assessments are very concrete concepts, and in the absence of such instruments or the legal mandate for NEBs to deal with them, many NEBs still often find alternative ways to mainstream equality and lay the groundwork for the use of these tools.

Key findings and observations drawn from good practices

Equality duties and equality impact assessments have proven to be useful and necessary tools in the current climate, in which both national legislators and the EU have expressed a high ambition to reach substantive equality. These tools help us to see and go beyond formal equal treatment.

Key learnings based on the submitted good practices:

- ▶ **If properly implemented, equality duties and equality impact assessments can be transformative tools.** There is currently an uneven development of duties, and a need to stimulate greater knowledge, expertise and use of them.
- ▶ **Most NEBs lack an explicit legal mandate** to work with and use equality duties and equality impact assessments, but still attempt to do so, demonstrating the potential of these tools.
- ▶ **Both equality impact assessments and equality duties are emerging tools and issues,** though equality duties seem to be more widely used.
- ▶ **Preparing an equality impact assessment requires adequate resources,** particularly staff expertise, which is likely to be a factor in why there are not more NEBs performing them.
- ▶ **Since most NEBs lack legal competence for working on equality duties,** they instead address them through using their policy advice powers, as well as by bringing in public authorities to support them.
- ▶ **Most of the good practices received on equality duties were preventive duties,** which could be seen as the most piecemeal and least ambitious of the three types of duties. While some institutional duties were received, there were no mainstreaming duty examples. It is important to **increase the use of mainstreaming duties,** and this is a field where public authorities could show leadership.
- ▶ **NEBs can play a crucial role** in the design, implementation and monitoring of equality duties and equality impact assessments. They can be champions, provide support, set standards and enforce equality mainstreaming measures.
- ▶ **Mainstreaming literacy needs to be increased among duty bearers.** NEBs can help with this, but again they need sufficient resources to provide training and development.

- ▶ **Equality mainstreaming cannot be an *ad hoc* exercise.** A planned, systematic and ambitious approach is needed. To avoid being tokenistic, stimuli and encouragement seem best as reaching cultural change is more useful and effective than sanctions, which typically lead to tokenistic responses. Nonetheless, where encouragement fails, **legislation and sanctions are still required.**
- ▶ **Equality mainstreaming tools and processes must be participatory,** involving affected persons and communities. Moreover, just like with any other tools and processes, monitoring and evaluating how they work is crucial.
- ▶ **Legal obligations introducing equality impact assessments and equality duties, and giving a mandate to NEBs to work on these** would greatly increase the effectiveness and impact of these tools. However, there are issues with **inadequate implementation capacity,** even where mandatory equality impact assessments and equality duties exist.
- ▶ **To create the right conditions, there needs to be more investment** in collecting relevant data, increasing capacity and expertise, and providing ample opportunities for networking, peer exchange and peer support for both NEBs and duty bearers.
- ▶ **NEBs also need the right conditions in terms of capacity, expertise, and powers and they must be strengthened to live up to their full potential.** Therefore, the European Commission's work on proposing legislation to strengthen equality bodies is very welcome and necessary.
- ▶ Nonetheless, even the best equipped NEB cannot do this alone. **Open cooperation with all relevant duty bearers and regulators** plays a crucial part in ensuring effective equality mainstreaming, as does enlisting the help of supervisory authorities and structures.

Conclusions and Recommendations

Recommendations to national and EU policymakers:

- ▶ Equality bodies must be given **adequate resources and powers** to be able to play their role in promoting and supporting the use of equality duties and equality impact assessments by public authorities and private actors.
- ▶ Equality bodies need a **clear mandate to work on equality mainstreaming,** including the explicit competence for working on equality duties.
- ▶ Overall, there needs to be more **legally binding equality duties and equality impact assessments,** as well as appropriate and enforceable sanctions where duty bearers fail to meet their responsibilities.
- ▶ Policymakers have a particular responsibility and opportunity in **promoting and pioneering the use of equality duties,** including mainstreaming duties as the most holistic type.

Recommendations to equality bodies:

- ▶ Equality bodies should **consider their important role in supporting** and overseeing the use of equality duties and equality impact assessments as tools for ensuring effective equality mainstreaming, and they should **include this as a focus in their own institutional strategies and priorities.**
- ▶ Since open cooperation with relevant duty bearers, supervisory structures, and regulators is crucial for effective equality mainstreaming, equality bodies should initiate and **carry out action** to promote the effective use of equality duties in a **co-ordinated approach with all relevant partners.**

Introduction

Without taking equality into account, no policy can be right. From transport to education, health to digital policies, equality concerns have to be placed at the heart of decision-making. It also diminishes the potential for institutional systems to discriminate.

Equality duties and equality impact assessments have proven to be useful and necessary tools in the current climate, in which both national legislators and the EU have expressed a high ambition to reach substantive equality. These tools help us to see and go beyond formal equal treatment.

Equinet, the European Network of Equality Bodies, brings together 47 equality bodies from across Europe. Equality bodies are public institutions set up across Europe to promote equality and tackle discrimination on grounds of gender, race, age, sexual orientation, religion and belief, disability, or other protected grounds. They play a fundamental role in the European non-discrimination architecture. As a first point of contact for victims of discrimination, equality bodies have an extensive understanding of how discrimination affects people in Europe.

In its Work Plan 2021², Equinet set out to establish a new Cluster of members focusing on Equality Mainstreaming, which would prepare a compendium of good practices in the field of equality duties and equality impact assessments. The aim of this Compendium is to inform the work of equality bodies and responsible public authorities and private actors.

In November 2021, Equinet organised a high-level [conference on equality mainstreaming](#) for European equality bodies where these good practices were presented and served as the basis for discussions with national and regional policy makers.

This Compendium was drafted by the Equinet Secretariat, on the basis of responses provided by the members of the Equinet Cluster on Mainstreaming members, with the expert advice of Art-Peeter Rooseve (Gender Equality and Equal Treatment Commissioner, Estonia) and Bruno Martens (Unia, Belgium), and further written contributions from Aleksandra Szczerba (Commissioner for Human Rights, Poland) and Ketevan Shubashvili (Public Defender, Georgia).

² See [Equinet's website](#) for the full work plan

Compendium of good practices

Through a survey³ conducted among its members in June 2021, Equinet collected good practices on their work on **equality duties** and **equality impact assessments**. We were particularly interested in hearing about examples where the equality body played a specific role, for example, monitoring, advising duty bearers, or as a duty bearer itself. The collected good practices are presented in the following three sections – Equality Impact Assessments, Equality Duties, and Additional Supporting Measures Aimed at Mainstreaming Equality. They also include definitions of what we mean by equality duties and equality impact assessments.

All respondents were asked to specify if there was a legal mandate for their equality body to work or be involved in equality duties and equality impact assessments, and what grounds and fields of life it covered. It is notable that not all equality bodies have this legal mandate, so in the absence of an explicit legal provision to work or be involved in equality duties and equality impact assessments, many equality bodies have interpreted their mandate broadly to still be able to cover these areas on certain grounds and fields of life. This variation in legal mandate, combined with differences in national level legislation and ways of working amongst different equality bodies is reflected in the good practices below.

29 practices were received from 17 different equality bodies, representing 17 European countries. For the purposes of the Compendium, a selection was made. The Compendium gathers first a compilation of equality impact assessments (containing 6 good practices) followed by a section on equality duties (containing 12 good practices) and finally a section dedicated to additional supporting measures aimed at mainstreaming equality, which includes 7 other good practices that support the concept of equality duties but did not fit our definition for 'equality duties'. Examples of this kind of practice include recommendations, guidelines, and training sessions aimed at raising awareness among duty bearers or rights holders.

³ Please see Annex 1 for the template.

1. Equality Impact Assessments

Introduction

This section focuses on **equality impact assessments**. Equinet defines an equality impact assessment as a systematic way of finding out whether a function, such as a policy or practice, is equality-compliant or if it has a disparate impact on particular communities, or groups within communities. Equality impact assessments can be used to determine disadvantage for any groups protected by Equality legislation.

This can be done either *ex-ante* (before the adoption or implementation of the function) or *ex-post* (when evaluating the concrete consequences of the function after it has been implemented for some time). Stricter interpretations⁴ of equality impact assessments only refer to those made *ex-ante*. Nonetheless, for the purpose of this Compendium, both have been included.

We included 6 good practice examples of equality impact assessments from equality bodies. Notably, we received many more examples of **equality duties** than of equality impact assessments. Although the reason for this disparity is not proven, based on our findings and our discussions during the Cluster on Equality Mainstreaming meetings, equality impact assessments appear to be an emerging issue, which may help explain the low number of relevant good practices we received. It is an interesting tool for equality bodies, where they can use multiple powers starting with research, good practice guidance, and policy advice. While none of the equality impact assessments featured in the Compendium are legally binding *per se*, they are usually followed up in practice and if a problem identified through an equality impact assessment is not addressed at all, the equality body may have the possibility to follow-up with legal action or turning to public authorities, the public, or Parliament.

The fields most often addressed in these good practices are **education** and **healthcare**, whilst the grounds most often covered are **race and ethnic origin, age, and disability**. All of these good practices targeted public authorities. In the majority of practices, government bodies acted upon the findings of equality body reports, screenings, and publications, which resulted in beneficial changes to equality despite none of the assessments being binding *per se*. Equality bodies focused on providing support and guidance to bring about effective change within policy. It is most notable that the majority of equality bodies reported policy changes or positive policy outcomes because of their equality impact assessments and actions.

However, we also found that preparing an equality impact assessment requires **adequate resources**, in particular **staff expertise**, which is likely to be a factor in why there are not more equality bodies performing them.

⁴ https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/impact-assessments_en

Good Practices: Equality Impact Assessments

Topic: Monitoring Report with a Special Focus on Children in Education

Equality Impact assessment

Equality Body: Commissioner for Protection from Discrimination, Albania

Ground(s) Race, Disability

Field(s) Education

Binding? No

Follow-up? No

The Commissioner for the Protection from Discrimination of Albania published a [Monitoring Report with a special focus on Children in Education](#) as part of the organisation's mandate to carry out duties to ensure compliance with the principles of equality and non-discrimination under article 21 and article 32 of the Law 10221/2010 "On protection from Discrimination". The duty to conduct a monitoring report (*ex-post* assessment) was imposed in the Resolution of the Assembly of Albania.

The report focused on analysing the compliance with the legislation of the inclusion of children with disabilities as well as Roma and Egyptian children in education. The report covered the school years 2018-2019 and 2019-2020. A questionnaire was sent to educational institutions and their responses were analysed in relation to the legislation in force, as well as the legal obligations of the educational institutions to the groups identified above. Within the document, the accessibility of institutions for disabled children was explored, as well as the need for continuous rehabilitation of schools, equipment, training for teachers, and adequate support of school activities. The document is available to the public, and its findings demonstrate that further improvements are needed to ensure that the rights and freedoms of students are adequately respected. Additionally, the report sets out recommendations for the responsible institutions.

The report did not result in a legally binding assessment, and since the recommendations made within the document are not binding, sanctions cannot be imposed. The organisation did not carry out any *ex-post* evaluations of impact following the report, therefore it cannot be determined if the recommendations proposed in the monitoring report were implemented by educational institutions within Albania.

Topic: Analysing Ex Officio Educational Stipends for Roma Students

Equality Impact assessment

Equality Body: Ombudswoman of the Republic of Croatia

Ground(s) *National origin, race or ethnic affiliation or colour*

Field(s) *Education*

Binding? *No*

Follow-up? *Yes*

The Office of the Ombudswoman of Croatia does not have an explicit duty within its mandate to monitor the annual Government Legislative Plans, but the organisation interprets its national equality body duties widely, thus, enabling it to do so. The equality body acted on its own initiative to conceptualise two reports that review the new rulebooks on acquiring a state stipend for students as proposed by the Ministry of Education. The [first report](#) was written in 2019 with a [second report](#) following in 2020.

This review included close inspection of the difference between rulebooks for Roma students and students with disabilities to check if Roma students were being treated less favourably than other student groups. The equality body noted that the Roma community within Croatia was a particularly vulnerable group. The equality body found that the rulebook for Roma students did not entail provisions in the same level of detail as other rulebooks, the stipend amount being lower than others and the dates for the announcement of the stipend public call were unspecified. On this basis, the report found that the differences between the rulebooks would be discriminatory as it would discourage Roma students from enrolling in universities and requesting stipends. Further analysis demonstrated that Roma women were at particular risk of being adversely affected due to lower levels of female attendance in comparison to male attendance within the education system.

Whilst the report recommends that the references to stipends within these rulebooks need to be amended, these recommendations are not binding for the public authorities. Therefore, the organisation has warned the Ministry of Education of the dangers of such practices, through the mechanism of public consultations services and in a separate letter. As a result of their actions, the Ministry has amended the proposed rulebooks in line with their proposals. More recently, data from the 2020 annual report has pointed to a considerable increase of Roma university students' participation in higher education. 2020 recorded the highest number of Roma students enrolled in universities (46), and that this may be linked to the increased stipends.

Topic: Mainstreaming Equality in the Implementation of the Welfare Development Plan

Equality Impact assessment

Equality Body: Gender Equality and Equal Treatment Commissioner's Office, Estonia

Ground(s)	<i>Horizontal</i>
Field(s)	<i>Employment and social protection</i>
Binding?	<i>No</i>
Follow-up?	<i>Yes</i>

The Gender Equality and Equal Treatment Commissioner's Office of Estonia does not have an explicit mandate to carry out equality impact assessments. It is, however, empowered to cooperate with other persons and entities to promote gender equality and equality according to Estonia's Equal Treatment Act⁵.

In June 2016, the Government of the Republic of Estonia approved the [Welfare Development Plan](#) in the field of employment and social protection. The plan brings together the strategic objectives of the labour, social protection, gender equality, and equal treatment policies for 2016–2023, providing a comprehensive overview of the main challenges, objectives, and directions of action in these policy areas. The Gender Equality and Equal Treatment Commissioner's Office has been a member of both the ad-hoc consultative committee and working groups on different areas of the Welfare Plan, to ensure its effective implementation. The Gender Equality and Equal Treatment Commissioner's Office has been frequently called on to provide input as part of this committee and they have worked to ensure that the whole policy package plan is in compliance with the different equality and non-discrimination provisions. The Gender Equality and Equal Treatment Commissioner's Office has also participated in the working groups meetings and, based on their conclusions, sent formal letters to the relevant ministries to point out where the principle of equality was not present or not adequately present in the Welfare Development Plan. Most of their recommendations have now been addressed in the plan.

Some of the challenges faced included effective collaboration between so many partners (which amounted to 30 governmental and non-governmental organisations, including Ministries, civil society organisations, human rights organisations, trade unions, etc.)⁶; the need for several major policy changes and reform agendas; and the intricacies of the funding schemes to support the welfare plan. Nonetheless, functionally, the working group meetings and the use of active communication were key for the success of the initiative.

⁵ Estonia's Equal Treatment Act § 16 (8) - <https://www.riigiteataja.ee/en/eli/503052017002/consolide>

⁶ Ministry of Social Affairs; Estonian Association of Local Governments; Ministry of Education and Research ; Estonian Association of Cities; Ministry of Justice; Ministry of the Environment; Estonian Employees' Unions' Confederation; Ministry of Rural Affairs ; Estonian Employers' Confederation; Ministry of Finance; Estonian Chamber of Commerce and Industry; State Chancellery; Estonian Small and Medium Entrepreneurs Association; Ministry of the Interior ; Chamber of Service Economy; Ministry of Defence; Estonian Association of Pensioners' Associations; Ministry of Economic Affairs and Communications; EAPN Estonia; Office of the Commissioner for Gender Equality and Equal Treatment Estonian Association of Non-Profit Associations and Foundations; Estonian Council of Churches; Round Table of Estonian Women's Associations; Estonian Chamber of Disabled People; Institute for Human Rights (Estonian); Human Rights Foundation; Estonian LGBT Association; Estonian Social Work Association; Child Welfare Association; and Social Enterprise Network.

Topic: Analysing Compliance of Municipal Programmes and Discrimination Legislation Regarding Healthcare

Equality Impact assessment

Equality Body: Public Defender (Ombudsman), Georgia

Ground(s)	All grounds
Field(s)	Access to social protection and healthcare
Binding?	No
Follow-up?	Yes

The Public Defender of Georgia has a legal mandate to act under Article 6.2 of the Law of Georgia on the elimination of all forms of discrimination, which enables the organisation to publish annual and thematic special reports that discuss the state of equality, vulnerable groups, and their disadvantages. Whilst the special reports of the Public Defender of Georgia are not binding, the aim is to provide documentation that provides support and guidance for local governments.

The Public Defender of Georgia produced several such special reports, including the annual [Special Report on Combating and Preventing Discrimination and the Situation of Equality \(2019\)](#), the [Special Report on Combating and Preventing Discrimination and the Situation of Equality \(2020\)](#), and the more specific [Special Report on Compliance of Municipal Social and Health Care Programmes with Principle of Equality](#). The Public Defender conducted an *ex-post* equality impact assessment of several municipal programs that resulted in their third special report named above, analysing the compliance of municipal programmes with anti-discrimination legislation. Close attention was given to assessing whether the program would have a different impact on communities (or groups within communities) and determining disadvantage for any groups protected by equality legislation. In addition to the report, the Public Defender of Georgia actively integrated the topic of municipal programs when conducting several informative meetings on the issue with the municipalities. A successful outcome of this report and engagement was reported in the case of the Georgian municipality of Mtskheta, which conducted an *ex-ante* equality impact assessment based on the report. After the Public Defender disseminated and discussed this report with all of the municipalities, the Local Assembly of Mtskheta Municipality proactively approached them to consult about the social and healthcare program the municipality was drafting. They noted that the Public Defender's report inspired them to ensure their draft program complied with equality legislation. As none of the examples of discriminatory provisions indicated in the third report was found in municipal programs introduced by the Mtskheta Municipality, this practice demonstrates successful cooperation between equality body and the local self-government authority. As a result, the social and health care program introduced complies well with anti-discrimination legislation.

Topic: Protecting Access to Healthcare Services Based on Health Status

Equality Impact assessment

Equality Body: Ombudsperson Institution of Kosovo, Kosovo⁷

Ground(s)	<i>Health status</i>
Field(s)	<i>Access to healthcare</i>
Binding?	<i>No</i>
Follow-up?	<i>Yes</i>

The Ombudsperson Institution of Kosovo, as part of its mandate, and through extensive stakeholder consultations, including with the HIV Prevention Program Advocacy Group, published an [ex-officio report with recommendations](#) to the responsible authorities regarding access to healthcare services for persons affected by the Human Immunodeficiency Virus (HIV) and Tuberculosis (TB), during the COVID-19 pandemic period in Kosovo.

The report set out recommendations aimed at assessing and ensuring the provision of healthcare services with a human rights-based and non-discriminatory approach for persons with HIV/AIDS and TB in Kosovo during the COVID-19 pandemic period. This report focused on universal health coverage as an objective of the 2030 Agenda for Sustainable Development. In addition, it aimed at drawing authorities' attention to the importance of adequate treatment of persons with HIV/AIDS and TB, given the detrimental consequences of the ongoing lack of access to it. The Report found violations regarding the fulfilment of constitutional and legal obligations towards persons with HIV and TB, noting issues such as insufficient specialist staff and a lack of facilities, as many services had ceased functioning during the pandemic.

While the Ombudsperson's recommendations are not binding for the public authorities *per se*, according to the Law on the Ombudsperson, a public authority has a 30-day legal deadline to respond to a recommendation after it is addressed to the relevant institution responsible for implementing it. A follow up during the implementation period is also required. Most of the recommendations proposed in the Ombudsperson's report are now being implemented.

⁷ This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

Topic: Promoting Equality of Opportunity Through Systematic Screening of Public Authorities' Policies

Equality Impact assessment

Equality Body: Equality Commission for Northern Ireland

Ground(s)	<i>Religion and belief, political opinion; race and ethnicity, age, marital status or sexual orientation, disability; and persons with dependent and persons without.</i>
Field(s)	<i>Provision of goods, facilities, and services.</i>
Binding?	No
Follow-up?	Yes

Under Schedule 9 of the Northern Ireland Act 1998, provisions are set out to give effect to statutory duties under Section 75 of the Act⁸. For the Equality Commission for Northern Ireland, this enables them to offer advice to public authorities and others in connection with statutory duties as well as to review the effectiveness of them. Section 75 of the Northern Ireland Act required public authorities to highly promote equality of opportunity between nine equality categories. Therefore, under this provision, the Equality Commission for Northern Ireland supported the Department for Communities, a public authority, to conduct a screening process for a policy named the [Inner Walled City Public Realm Project: October 2017\(IWCPR\)](#).

The IWCPR project relates to the development of a public realm scheme within Derry/Londonderry. Initial screening in April 2016 did not identify any adverse policy impacts or mitigation measures but following a public consultation in June 2016–August 2016, the department was requested to review its initial screening. The second screening considered whether there were any impacts or opportunities to promote equality across the range of equality grounds. The screening was held under the guidance and rules of Section 75 Equality Assessments (Screening and Equality Assessments)⁹ with specific focus given to promoting equality for disabled people.

The Equality Commission enabled this process by providing ongoing key advice to the public authority conducting the screening. The Commission's advice was to focus consultation on key groups such as disability groups, the Department for Infrastructure Transport officials, and the Design Team, to help identify measures that promote equality of opportunity. The results of the screening identified that the policy will positively impact on all equality groups, including those with multiple identities – a prime example being older persons with disabilities. The screening also noted that enhanced accessibility and better footways, carriageways, and controlled parking will also benefit users with prams, buggies, and wheelchairs. The second screening of the policy resulted in additional feedback that noted concerns relating to the proposals for flush surfaces between the footway and carriageway, the absence of raised kerbs, and proposals for parking.

Under Section 9 of the Northern Ireland Act, investigations can be initiated by the Commission or based on a complaint by a directly affected person. This investigation relates to a failure by public authorities to comply with their approved equality scheme. As a result of the second screening, the

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[https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/Public%20Authorities/Public Sector Equality and Disability Duties-Short Guide.pdf](https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/Public%20Authorities/Public%20Sector%20Equality%20and%20Disability%20Duties-Short%20Guide.pdf)

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<https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/Public%20Authorities/S75Advice-ScreeningEQIA.pdf>

IWCPR was amended to reflect the evidence and consultation. Key changes included the use of kerbs to avoid any adverse impact on those who are blind or partially sighted, including guide dog users. In addition, measures were taken to ensure an adequate number of crossing points, use of tactile paving, use of colour contrasting in paving, minimal obstructions caused by street furniture, the provision of adequate parking spaces, and enforcement of parking restrictions, including pavement parking.

2. Equality Duties

Introduction

This section includes 11 good practices on **equality duties**, which we define as **positive legal obligations** to promote equality and prevent discrimination, going beyond the general obligation to refrain from discrimination. Equinet's earlier study '[Making Europe More Equal: A Legal Duty?](#)', commissioned in 2016, concluded that there are three main categories of statutory duties in place in Europe:

- ▶ **Preventive duties** are statutory duties on organisations (public and private) to take measures to prevent discrimination, harassment, or sexual harassment in employment or in the provision of goods and services.
- ▶ **Institutional duties** are statutory duties on organisations (public and private) to promote equality for employees or for people accessing their services.
- ▶ **Mainstreaming duties** require public authorities to have due regard to the need to promote equality in carrying out their functions, including legislating, budgeting, regulating, and policy making.

For equality duties, we found that equality bodies' interventions were taken most often in the field of **employment** and access to **goods and services**. **Gender** was the protected ground addressed by equality bodies most often, either separately or among other grounds. Most of the good practices we received were preventive duties, which could be seen as the most piecemeal and least ambitious of the three types of duties. It is notable that while we received some institutional duties, we did not see any mainstreaming duty examples. It is important to increase **mainstreaming duties**, and this is a field where public authorities could show leadership. The nature of mainstreaming duties is also such that they would often need to be connected with **equality impact assessments** since to 'have due regard to equality', duty bearers would need to see the potential impact of their decisions.

We found that most **equality bodies lack legal competence for working on equality duties**. Instead, they address them through using their policy advice powers, as well as by bringing in public authorities to support. For example, many equality bodies made recommendations to public authorities or found alternative ways to bring their cases to institutions or courts, which in practice, have actual legally binding powers. The recommendations contained in these good practices are addressed both to public bodies and private entities. They take the form, for example, of manuals explaining to the respective duty bearers the concept of sexual harassment and the protective mechanism against it. While this approach often seems to work, the impact of these equality duties would greatly benefit from gaining a legally binding character. Moreover, in these good practices submitted, we often see equality duties that are not statutory, but rather developed by the equality body itself. It seems that this could be the result of a lack of sufficient statutory equality duties, leading to equality bodies trying to step in to fill the gaps.

Another important trend we observed is that much like robust data collection, strong **cooperation** and **communication** with relevant government authorities, institutions, civil society organizations (CSOs) and private actors is key to ensure the success of equality duties. In fact, we see that a first obstacle for the success of an equality duty involves the difficulty of effectively illustrating and proving the extent and gravity of the issue that must be tackled. In this sense, having the support of

relevant government authorities, institutions, CSOs or other organisations is crucial. Thanks to cooperation with private actors, equality bodies are able to strengthen the outreach of their actions and to maximize their effects. At the same time, cooperation with public authorities may be used to substitute for the lack of equality bodies' competence to undertake legally binding actions, as noted above.

Apart from the lack of legal competence, the most serious obstacle to realising equality duties reported by equality bodies was **inadequate resources**. However, it is encouraging to note that there was follow-up to most actions by the relevant duty bearers.

Overall, we found that ongoing work by equality bodies with partners demonstrates that equality duties work, and they don't result in undue burden. Therefore, EU and Member State legislators should consider using this tool more often and making them legally binding.

Good practices: Equality Duties

Topic: Promoting Equality and Non-Discrimination in the Workplace

Equality Duty – Preventive Duty

Equality Body: Commission for Protection against Discrimination, Bulgaria

Ground(s)	<i>All grounds</i>
Field(s)	<i>Employment</i>
Binding?	<i>No</i>
Follow-up?	<i>Yes</i>

The Bulgarian Commission for Protection against Discrimination (CPD), as part of its broad legal mandate to make recommendations to public authorities to end any discriminatory actions, organises training seminars under a project called "Anti-Discrimination in the Labour Market". The project is aimed at employees of the CPD, the Ministry of Labour and Social Policy (MLSP), and representatives of other organizations and institutions. Participants of this training acquire the necessary competencies to improve the application of the principle of equality in the field of labour and employment in both the public and private sectors. The CPD certifies all participants with a voluntary certification of compliance with national standards.

As part of this work, the CPD prepared a "National Strategy for Combating Discrimination in the Labour Market" which was printed and promoted to all stakeholders, including employers, workers, and trade unions. The CPD also developed and promoted internal rules for non-discrimination for employers. For the training, the CPD created and promoted the procedure for voluntary certification and established and trained a certification committee. The pilot training session led to the certification of 20 employers.

The CPD cited the need to raise public awareness to help reduce the incidence of discrimination and promote equality and diversity, including in the workplace. However, it highlighted the lack of necessary financial and human resources as a challenge not only when carrying out this work, but in general. Conversely, the CPD underlined the importance of cooperating closely with other relevant national and international bodies to ensure that it can positively impact the development and implementation of policies in the field of equality and non-discrimination, both nationally and internationally.

Topic: Preventing Sexual Harassment in Public Services

Equality Duty – Preventive Duty

Equality Body: Commissioner for Administration and the Protection of Human Rights (Ombudsman), Cyprus

Ground(s) *Gender*

Field(s) *Employment*

Binding? Yes

Follow-up? Yes

The Commissioner for Administration and the Protection of Human Rights (Ombudsman) of Cyprus has a legal mandate to work on equality duties and it produced a [Code of Conduct on Preventing and Combating Harassment and Sexual Harassment in Public Service](#) which has become legally binding.

The Cypriot Ombudsman drafted the code of conduct which was approved by the Council of Ministers in July 2018 as a binding decision. Therefore, public services must comply with its content and cooperate for its implementation. It was published in January 2019 and since then, the Ombudsman, in cooperation with the Cyprus Academy of Public Administration, has developed and opened two types of training on the code of conduct. The first is a general training to inform employees in the public sector about the code of conduct and the second is a specialized training for members of the Equality Committees. Until now, more than 40 training sessions have been held, with more than 800 employees participating. Moreover, many public authorities have designated their Equality Committee (for the monitoring and implementation of the code of conduct) and many employees have contacted the Ombudsman's Office for clarification or information regarding the implementation of the code.

Overall, the Ombudsman has witnessed an active interest on behalf of public services to engage with the training programmes and to be well-informed about the code. This includes proper implementation in respect of public services' obligations to take measures for the prevention and handling of harassment and sexual harassment in the workplace. However, a few initial challenges were identified, including some reluctance from heads of public services to engage in the training sessions due to the belief that these incidents do not occur in their workplace, which the Ombudsman overcame with persistence.

Topic: Preventing Sexual Harassment in the Workplace

Equality Duty – Preventive Duty

Equality Body: Public Defender of Rights, Czech Republic

Ground(s)	<i>Gender</i>
Field(s)	<i>Employment</i>
Binding?	<i>No</i>
Follow-up?	<i>Yes</i>

The Czech Public Defender of Rights (PDR) is not specifically legally mandated to work on equality duties beyond issuing recommendations concerning discrimination. However, the PDR worked together with the Office of the Government of the Czech Republic, to issue a [manual](#) for civil service offices on prevention of, and dealing with sexual harassment at work, supporting them to deliver on their preventive duties.

The manual aims to be practical and contains a sample questionnaire for anonymous inquiry as well as an example of a sensitive interview with a victim of sexual harassment. The PDR was involved from the very beginning of the preparation of the manual and drafted a significant part of it, whilst the dissemination and distribution is the responsibility of the Office of the Government. In cooperation with the Office of the Government, the PDR has organised several meetings and trainings for the responsible superior officials of administrative bodies to implement the manual in practice. More trainings are planned to follow.

While making and implementing the manual was not compulsory, now that the manual been introduced, the PDR can deal with a complaints when an administrative body, as an employer, fails to secure the preventive duties addressing sexual harassment or fails in dealing with an individual case of alleged sexual harassment. This kind of manual on sexual harassment had not been available in the Czech Republic before, so it was very useful to create and disseminate it.

The PDR reported that the most challenging aspect of this practice was obtaining the approval of the political representatives of the civil service offices. It took two years after the manual was written to convince them that sexual harassment was an issue that needed to be addressed. The PDR overcame this challenge through long-term and repeated discussion and explanation with the relevant stakeholders.

Topic: Making Recommendations to Avoid Discriminatory Practices in Enrolment of Children in Preschools and Schools

Equality Duty – Preventive Duty

Equality Body: Public Defender of Rights, Czech Republic

Ground(s)	<i>Ethnicity, disability, nationality, age. Intersectional.</i>
Field(s)	<i>Education</i>
Binding?	<i>Not when issued, but yes when incorporated into the inspectorate guidelines (de facto)</i>
Follow-up?	<i>Yes</i>

The Public Defender of Rights (PDR), after receiving a number of complaints from parents, issued two recommendations ([Recommendations of the Public Defender of Rights on equal access to preschool education](#) and [Recommendation of the Public Defender of Rights concerning equal access to compulsory school education](#)) targeting both schools and municipalities regarding equal access to preschool and access to compulsory school education. It targeted the criteria used by headteachers to select students when the applications for enrolment are higher than the number of available open school places since the PDR had noted that some of these criteria were directly or indirectly discriminatory.

While the PDR's recommendations are not binding, the Czech School Inspectorate incorporated them into its inspection activities. Additionally, the Ministry of Education, Youth and Sports amended the decree on elementary education, adding more details and specifications on enrolment procedure, and adjusted its guidelines. If the Inspectorate finds that these guidelines are not respected, it will impose a sanction on the school.

Topic: Supervising Equality Planning of Public Authorities and Education Providers

Equality Duty – Institutional Duty

Equality Body: Non-Discrimination Ombudsman, Finland

Ground(s)	<i>Age, origin, nationality, language, religion, belief, opinion, political activity, trade union activity, family relationships, state of health, disability, sexual orientation or other personal characteristics (open ended list).</i>
Field(s)	<i>Public services</i>
Binding?	Yes
Follow-up?	Yes

According to the Finnish Non-Discrimination Act (1325/2014), state and municipal authorities, education providers, and employers have a duty to promote equality. This includes that the obligated agents must have plans with necessary measures for the promotion of equality. The Non-Discrimination Ombudsman supervises the observance of the Non-Discrimination Act, including in this regard. It has required that State ministries, as part of their duty to actively promote equality, counsel and supervise all the bureaus and authorities within their branch of administration to ensure that these agents fulfil their obligation to promote equality, including having operational equality plans. The Non-Discrimination Ombudsman has advocated for, and co-operated with ministries so that they would include these requirements into their annual results-based management and steering policies within their administrative branch.

The Non-Discrimination Ombudsman has had an essential role in every phase of this practice. It is a member of the EU REC-project *Yhdenvertaisuuden tekijät* (Drivers of Equality) run by the Finnish Ministry of Justice which is ongoing for the next 2 years (2021-2022). The Ombudsman's task is to develop an online tool for ministries' self-monitoring within the branch. The online tool aims also to make the Ombudsman's supervision more effective by giving access to the provided data and statistics. The Non-Discrimination Ombudsman has drawn up indicators and checklists to make the task easier for ministries and other authorities. These checklists and indicators can also make the Ombudsman's duty to supervise more effective and some of the indicators can be automated. Moreover, the Ombudsman meets regularly with the Heads of Offices from the ministries with the expectation that ministries monitor and give guidance to their offices as part of their duty to promote equality.

If responsible authorities or educational institutions neglect their equality planning obligations, the Non-Discrimination Ombudsman is legally empowered¹⁰ to bring the matter to the National Non-Discrimination and Equality Tribunal for measures¹¹, including the possibility to impose a conditional fine or an order.

The Ombudsman has found that the obligation to prepare an equality plan for the promotion of non-discrimination in a systematic manner is a strong tool, both for the prevention of discrimination and for the processing of discrimination situations. Since almost every authority in Finland (excluding municipal authorities) are situated in the hierarchy of an administrative branch, the Ombudsman's approach of cooperation with the ministries is an effective way to reach a wide audience. On the

¹⁰ Finnish Non-Discrimination Act, Section 21 (Bringing the matter for handling by the National Non-Discrimination and Equality Tribunal), subsection 3

¹¹ Measures provided for in Finnish Non-Discrimination Act, Section 20(3)

other hand, the number of organisations and actors who are obliged to draft equality plans is immense, so it is not realistic to supervise all the individual plans case by case.

Another challenge identified by the Ombudsman is that they have found that the obligation to make an equality plan is approached by many organisations in a very technical manner, with the focus being on completing the plan rather than on the result and benefit of it. Plans are often not completed afresh for each organisation, sometimes even copied, completely or partially, from other plans, which risks it being unsuitable and potentially replicating mistakes. The Ombudsman has also found that equality plans are often too vague and effective results cannot be achieved by trying to interpret what is hidden between the lines.

Topic: Protecting Rights of Older People to Travel Insurance

Equality Duty – Preventive Duty

Equality Body: Public Defender (Ombudsman), Georgia

Ground(s)	Age
Field(s)	Access to services
Binding?	No
Follow-up?	Yes

The Equality Department of the Georgian Public Defender received a complaint that Ardi Insurance Company had set an age limit of 70 years after which people were denied travel insurance. On examination of the case, it became evident that the insurance company had not fulfilled its obligation to implement the required legal measures set out in Article 4 of the Law of Georgia on the Elimination of All Forms of Discrimination. Therefore, the Public Defender issued a recommendation that travel insurance companies could not set a blanket age limit beyond which a person is denied travel insurance, as this would be discriminatory. The rule could make it impossible for older persons to have access to travel insurance, and may be seen as interference with the right to freedom of movement.

Although the Public Defender's recommendation was not a binding decision, the insurance company complied with it and abolished the age limit for travel insurance. It also updated a special insurance questionnaire for 65+ individuals to objectively identify increased risks according to the content of the risk and not the age. Moreover, the recommendation was received by the Insurance State Supervision Service of Georgia (LEPL), which introduced its own guidance on preventing discrimination of customers on the ground of age in the field of travel insurance. That guidance is applicable to all insurance companies operating in Georgia and is accompanied by explanatory note which cites the recommendation issued by the Public Defender of Georgia as a basis for it. Thus, the recommendation stimulated the introduction of new policies and procedures in the field travel insurance services.

The key challenges identified by the Public Defender concerned difficulties in overcoming the stereotypical assumptions often made about older people. These include the notion that higher age represents a higher risk, which is especially evident in the fields of insurance and banking. As a result of these assumptions, duty bearers often fail to comply with their statutory duties due to concerns over the potential loss related to providing their services to older people. The Public Defender sought to overcome this challenge by citing authoritative materials of international and regional institutions, including Equinet's Discussion Paper on Fighting Discrimination on the Ground of Age¹², which helped ensure the effectiveness of the recommendation, since they provided comprehensive conclusions regarding the specific issues related to the case.

A summary of the practice can be found in the Special Report on Combating and Preventing Discrimination and the Situation of Equality (2019), p. 20-21, 34, available [here](#). A brief of the case can be found [here](#).

¹² <https://equineteurope.org/publications/fighting-discrimination-on-the-ground-of-age/>

Topic: Preventing Sexual Harassment in Healthcare

Equality Duty – Preventive Duty

Equality Body: Public Defender (Ombudsman), Georgia

Ground(s)	Gender
Field(s)	Healthcare
Binding?	No
Follow-up?	Yes

The Georgian Public Defender investigated a case concerning the sexual harassment of a quarantined woman by a doctor who had signed a contract with the Social Services Agency. This was an *own initiative* investigation of the Public Defender, started upon receiving a report from the National Preventive Mechanism (the Public Defender of Georgia also carries out the functions of a National Preventive Mechanism) after monitoring places of restriction of freedom related to quarantine measures against coronavirus in March-May 2020.

Based on the case materials, the questioning of the parties and third parties (including doctors), and on the responses received from the relevant agencies, the Public Defender concluded that all three forms of sexual harassment were evident in the case (verbal, nonverbal, and physical conduct), which created a humiliating and abusive environment for the applicant. It found that the duty bearers did not respond to the fact of sexual harassment with due sensitivity, responsibility, and expedience because of the lack of proactive measures (including policy documents, training the contracted doctors, etc.). Furthermore, the Public Defender issued a recommendation, which is not a binding decision. As a result of the recommendation, an effective measure was taken by the Social Service Agency, which stated that they have started to work on a sexual harassment prevention policy document and to plan measures for the provision of the relevant information to the employees and service providers. The draft policy document was reviewed by the Public Defender.

The practice of the Equality Department of the Public Defender of Georgia illustrates that respondents tend to justify their actions from a medical standpoint, thinking that they can use the decision-maker's lack of expertise to their advantage. However, the Public Defender of Georgia always seeks the opinions of field experts and relies on them in the process of examining the case. This way, the decision delivered is well-founded both legally and medically.

A summary of the practice can be found in Special Report on Combating and Preventing Discrimination and the Situation of Equality (2020), p. 8-9, 45, available [here](#). A brief of the case can be found [here](#).

Topic: Preventing Secondary Victimization of Sexual Violence Survivors

Equality Duty – Preventive Duty

Equality Body: Public Defender (Ombudsman), Georgia

Ground(s)	<i>Gender</i>
Field(s)	<i>Forensics service, criminal proceedings</i>
Binding?	<i>No</i>
Follow-up?	<i>Yes</i>

The Public Defender of Georgia examined the case of a female victim of sexual violence, who had been twice examined by male experts due to the absence of female experts. This practice has been shown to carry a risk of secondary victimization. The responsible party, the Levan Samkharauli Forensics Bureau (LEPL) (a public entity) underlined that legislation provided for the possibility to transfer a woman to another branch of the Bureau on request or to invite an expert of the same sex. However, since only one out of 19 medical experts is female, the Public Defender found that the rule is not observed in practice.

The Public Defender issued a recommendation, urging the duty bearer to employ more female experts and provide appropriate training to existing staff. The Public Defender's Equality Department also offered support to the Bureau in the process of the proper implementation of the equality duty and in the training of its staff. As a result of Public Defender's recommendation, the respondent plans to employ female experts for the examination of female victims of sexual violence, and the staff responsible for conducting examinations will be trained in the psychological aspects of communication with victims, with support from the Public Defender. With the support of Council of Europe, the Office of Public Defender undertook trainings for respective representatives of the Forensics Bureau on legal and psychological aspects of communication with victims of sexual violence.

The Public Defender stated that a key challenge was the need to illustrate the systemic negative effect of the practice and the lack of female experts, as the respondent pointed out the fact that the applicant had not expressed opposition to being examined by male experts. The Public Defender used pre-existing research on the [Administration of Justice on Sexual Violence Crimes Against Women in Georgia](#) that it had conducted, which helped to provide a solid evidence basis for the recommendation.

A summary of the practice can be found in Special Report on Combating and Preventing Discrimination and the Situation of Equality (2020), p. 12-13, 46, available [here](#). A brief of the case can be found at [here](#).

Topic: Training and Support for Sexual Harassment Prevention and Reporting

Equality Duty – Preventive Duty

Equality Body: Public Defender (Ombudsman), Georgia

Ground(s)	Gender
Field(s)	<i>Every field within which sexual harassment may take place.</i>
Binding?	No
Follow-up?	Yes

The Public Defender of Georgia has published a practical guide on sexual harassment in order to support representatives of different fields to better understand the specific character of sexual harassment and respond to the facts more effectively and in accordance with national and international standards. The official website of the Public Defender of Georgia also offers any interested person an online course, called "[For the prevention of sexual harassment](#)". Some private and public entities have made it compulsory for their employees to take this course. The Public Defender also carries out trainings for public and private entities on drafting internal organisational mechanisms for the prevention of sexual harassment. At the same time, with the involvement of the Human Rights Secretariat of the Government of Georgia, internal sexual harassment prevention mechanisms are being introduced in public institutions. This will help to properly inform employees of specific organizations and prevent sexual harassment in the workplace, as well as to enable the organisation's management to review the cases of alleged harassment themselves.

The key challenge in the beginning was to illustrate the gravity of the issue of sexual harassment and the importance of drafting internal mechanisms to respond to relevant cases. Because the facts of sexual harassment are often concealed, it can be difficult to demonstrate the actual situation. Recent legislative changes introducing the direct prohibition of sexual harassment by law have helped to overcome these challenges, since the number of applications sent to the Public Defender has increased and the public debate on the issue has developed.

The Public Defender has launched a special section on [their web site](#) providing briefs of decisions on finding of sexual harassment. A summary of the practice can be found in the [Special Report on Combating and Preventing Discrimination and the Situation of Equality](#) (2020), p. 10-12. A [Practical Guide on Sexual Harassment](#) is also available.

Topic: Developing an Equality Code for Employers

Equality Duty – Institutional Duty

Equality Body: Commissioner for Protection of Equality, Serbia

Ground(s)	<i>All grounds of discrimination: race, skin colour, ancestors, citizenship, national affiliation or ethnic origin, language, religious or political beliefs, gender, gender identity, sexual orientation, financial position, birth, genetic characteristics, health, disability, marital and family status, previous convictions, age, appearance, membership in political, trade union & other organisations & other real or presumed personal characteristics</i>
Field(s)	<i>Employment</i>
Binding?	<i>No</i>
Follow-up?	<i>No</i>

Although the Serbian Commissioner for Protection of Equality does not have a legal mandate to work on equality duties, when performing its preventive role it is authorized and obliged to promote equality by recommending measures to public authorities and other subjects. An interesting example of this was the development of guidelines for the creation of an [Equality Code](#) for employers. This publication was drafted in the framework of the IPA 2013 Twinning project “Support to the Advancement of Human Rights and Zero Tolerance to Discrimination”. The Equality Code was created to provide guidelines for creating an anti-discrimination policy for employers in Serbia.

The next step for the Commissioner was the promotion of the Equality Code for employers, through events and visits to employers. The Commissioner appealed to businesses by explaining that accepting and respecting the equality principle is not only a legal obligation, but also contributes to the company’s success, since the most productive worker is the one who is motivated. The Commissioner stressed that this linking of success with respecting equality, was supported by the fact that a growing number of employers was ready to implement the Code in their business practices.

The adoption and promotion of the Equality Code has raised awareness on the prohibition of discrimination among employers, as well as the benefits of diversity in the work environment. To date, many employers in Serbia have adopted the new Code.

Topic: Monitoring and Supervising Active Measures

Equality Duty – Institutional Duty

Equality Body: Equality Ombudsman, Sweden

Ground(s)	<i>Gender, gender identity or expression, ethnicity, religion or other belief, disability, sexual orientation, age</i>
Field(s)	<i>Employment, education</i>
Binding?	<i>Indirectly.</i>
Follow-up?	<i>Yes</i>

In Sweden, two categories of duty bearers, employers and education providers, have statutory equality duties/institutional duties under the terms of the Swedish [Discrimination Act](#) (2008). This takes place in the form of an obligation to undertake so-called “active measures” (prevention and promotion measures aimed at preventing discrimination and serving in other ways to promote equal rights and opportunities regardless of sex, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation or age within a given establishment).¹³ According to the Discrimination Act, employers and education providers in Sweden are obligated to continuously apply a four-step approach (investigate, analyse, take measures and monitor/evaluate) in their work on active measures, and this work must be conducted continuously.¹⁴ Moreover, depending on the number of employees, duty bearers are required to annually document their work on active measures.

The Swedish Equality Ombudsman’s mandate includes:

- the power and the obligation to monitor the compliance of duty bearers with their obligations under the Discrimination Act;
- providing information on their obligations under the Act¹⁵;
- supervisory responsibilities to conduct independent reviews to verify that the activities reviewed fulfil the legal requirements.

The assessment in a decision by the Equality Ombudsman regarding the fulfilment or non-fulfilment of the obligation of duty bearers to work with active measures has no direct effect. However, duty bearers who fail to fulfil their obligations to work on active measures or to keep documentation may be ordered to fulfil them through an application by the Ombudsman to the Board against Discrimination. Such a binding order, which is to be combined with a conditional financial penalty is issued by the Board against Discrimination upon application by the Equality Ombudsman. An order can also be directed towards the State as an employer or as an entity responsible for educational activities.

The Ombudsman has identified several shortcomings with the Act and the active measures it requires:

- **the lack of sufficiently effective sanctions for duty bearers** who fail to comply with the requirements of the work on active measures. The provisions on active measures are framed

¹³ Chapter 3, Section 1 of the Swedish Discrimination Act.

¹⁴ Chapter 3, Section 2 of the Swedish Discrimination Act.

¹⁵ For example, by informing employers and education providers about the meaning of active measures (via website or [e-guide](#) for instance).

in such a general way that it makes it difficult to demand a duty bearer to carry out a concrete measure.¹⁶

- duty bearer's general **lack of knowledge** of their obligation to work on active measures in all its aspects, according to the Discrimination Act. This is proven by the [2020 report](#) by the Ombudsman, which analysed municipalities' guidelines and routines regarding harassment, sexual harassment, and retaliation. The report concluded that the municipalities needed to increase their knowledge of the Discrimination Act.

These challenges are dealt with through continuous work by the Equality Ombudsman, which uses the experiences from its supervision activities about shortcomings in the work on active measures by duty bearers in order to provide them with the necessary information about active measures. In addition, as part of its promotional work, the Ombudsman has dialogues with duty bearers to help them overcome shortcomings in their work on active measures.

¹⁶ See the [2019 Report](#) by the Swedish National Audit Office: The Discrimination Act's equal pay survey requirement – a blunt instrument for reducing the gender pay gap (RiR 2019:16). Also, a [2020 Inquiry](#) by the Swedish Government, Inquiries: More effective supervision of the Discrimination Act – Active measures and the school-law regulated area (SOU 2020:79), (Swedish language with an English summary)

3. Additional supporting measures aimed at mainstreaming equality

Introduction

This section includes other good practices that are related to supporting the concept of equality duties and equality mainstreaming but which do not fit within the definition provided for statutory equality duties. Examples of this kind of 'softer' approach by equality bodies include recommendations, guidelines, and training sessions about equality duties, aimed at raising awareness among duty bearers or rights holders.

The reason we decided to include this category is that equality bodies often find alternative ways to mainstream equality in the absence of equality duties and equality impact assessments or the legal mandate to deal with them. Some of these may contribute to and lay the groundwork for future equality impact assessments, such as assessments of the levels of equality and diversity in workplaces. Others might affect future equality duties, such as documenting the need for statutory equality duties, providing guidance to operationalize existing legal provisions, or training and sensitising duty bearers.

It appears that additional measures mainly are designed as awareness raising or educational activities and are aimed at a wide range of groups. Some compelling examples that could be mentioned include the Estonian Gender Equality and Equal Treatment Commissioner's Office's initiative of a cross-media project aimed at encouraging the youth to make professional choices free from gender stereotypes and the experience of the Office of the Equal Opportunities Ombudsperson of Lithuania of creating assessment tools for both private and public organisations to measure diversity and gender equality within workplaces.

It is notable that despite complexities in further pursuing the efficiency of those measures, since they are basically of general rather than individual character, the majority of equality bodies saw follow-up of their respective activities. Further, while elaborating additional measures, equality bodies try to adjust to the will and needs of duty bearers and tailor their activities respectively. For instance, the Austrian Ombudsperson for Equal Treatment designed a brochure that not only provided information but focused on measures to prevent sexual harassment at the workplace.

**Good practices
Additional supporting
measures aimed at
mainstreaming
equality**

Topic: Fighting Sexual Harassment in the Workplace through Issuing Information to Employers

Additional supporting measures aimed at mainstreaming equality

Equality Body: Ombud for Equal Treatment, Austria

Ground(s)	<i>Gender</i>
Field(s)	<i>Employment</i>
Binding?	<i>No</i>
Follow-up?	<i>No</i>

Under the Austrian Equal Treatment Act, employers are bound to take remedial action that is appropriate in cases of harassment in the workplace. All forms of harassment at the workplace are covered by the Act in the same way (on grounds of gender, ethnic origin, age, sexual orientation, religion, and belief). Through cooperation with employers who had reached out to the Ombud for Equal Treatment to request help in training employees and managers about the legal situation and duties concerning sexual harassment, the Ombud produced a [brochure](#) that not only provided information but focused on measures to prevent sexual harassment at the workplace.

The brochure explained the different elements of sexual harassment and the meaning of appropriate remedial action through the presentation of concrete examples and organisational processes that are necessary for ensuring a safe working environment. The brochure acts as a quick reference book for the prevention of sexual harassment. It also makes sexual harassment a topic within the workplace or organisation that is not taboo. Through regular discussion and establishing structures that encourage complaints, it is believed that the brochure will help to improve working standards, transparency, and effectiveness. The equality body interacted with employers who recognised the need to take preventive action and focus specifically on sexual harassment.

A recognisable challenge was ensuring that the brochure was understandable. It was important to focus on the main aspects concerning the prevention of sexual harassment, but also to communicate the information in a manner that would encourage employers to implement these measures. This is especially important given that the prevention of harassment is not legally binding for employers in Austria and there are no sanctions in place. Sanctions are only administered for not taking appropriate remedial action by employers in cases of sexual harassment.

Topic: Ensuring Non-Discrimination in Job and Housing Advertisements

Additional supporting measures aimed at mainstreaming equality

Equality Body: Ombud for Equal Treatment, Austria

Ground(s)	<i>Gender, age, ethnic origin, sexual orientation, religion and belief</i> ¹⁷
Field(s)	<i>Employment, access to housing</i>
Binding?	Yes
Follow-up?	Yes

The Austrian Ombud for Equal Treatment, though not legally mandated to be involved in equality duties, has repeatedly addressed employers who place job advertisements and private job placement agencies, as well as advertisers of housing space, to bring their attention to the legal duty to advertise in a non-discriminating manner. This regards the field of employment concerning the grounds of gender, age, ethnic origin, sexual orientation, religion and belief, whilst the housing area concerns only the grounds of gender and ethnic origin, since only these grounds are protected beside the labour market area in the Austrian Equal Treatment Act.

Employers, job placement agencies and advertisers of housing space are fined by the competent district authority with an amount of up to 360 euros upon demand of, beside others, the Ombud for Equal Treatment, when advertising in a discriminatory way. The Ombud for Equal Treatment cooperates with the regional district authorities in this area, and it is legally enabled to demand either a reprimand or a penalty by the regional district authority. The decision of the district authority is binding. However, employers and advertisers of housing space are only reprimanded in the case of first-time advertising discrimination. This is part of the Austrian Equal Treatment Act (§§ 10, 24, 37). Moreover, from the Ombud's perspective, the penalty is too low.

Conversely, the Ombud highlights that this legal duty is a good possibility to draw the attention of advertisers to the fact that advertisements must not be discriminating. The Ombuds used this opportunity to support measures aimed at equality mainstreaming. In a good example of successful cooperation, the Ombud supported the Association of Real Estate trustees to produce a brochure to inform its members about the regulation, leading to the widespread dissemination of information amongst one of the target groups, namely those responsible for housing advertisements. The Ombud also produced a [webinar](#) for the Association of Real Estate trustees to inform them about non-discriminating housing and an [information folder](#) concerning housing space, where the duty of advertising housing space in a non-discriminating manner is also covered. The Ombud for Equal Treatment noted that it had faced some challenges regarding resources while working on this topic. It overcame this issue by making this a special project for some time, allowing it to put more resources into this work for the project's duration.

¹⁷ Concerning housing advertisements, only the grounds of gender and ethnic origin are covered.

Topic: Fighting Gendered Career Choices Through Cross Media Project Aimed at Supporting Youth

Additional supporting measures aimed at mainstreaming equality

Equality Body: Gender Equality and Equal Treatment Commissioner's Office, Estonia

Ground(s) *Intersectional: age, gender, other grounds*

Field(s) *Employment*

Binding? *No*

Follow-up? *Yes*

The Estonian Gender Equality and Equal Treatment Commissioner's Office initiated [a cross-media project](#) aimed at young people that ran from 2017 to 2019. This project was funded by the European Commission and was run in collaboration with Estonian Public Broadcasting, Tallinn University, SA Innove, Estonian Ministry of Education and Research, Office of the Equal Opportunities Ombudsperson of Lithuania, and the Centre for Gender Equality in Iceland. Its purpose was to ensure that young people do not make their career choices restricted by gender stereotypes, but based on their will and abilities. To do so, the project aimed at helping young people to notice and deal with any kind of discrimination that could hinder their outlooks, perceptions, and possibilities. One of the outputs of this project was a 10-episode TV show called "Why Not?!". The TV show became very popular and received several awards. An impact assessment was carried out to analyse the impact of the initiative.

The main challenge concerned making sure that cooperation between the different duty bearers worked and that it would be relatable to young people. Nonetheless, those were also keys to the success of the initiative, given the modern cross media approach and well-structured cooperation both on national and regional level (EU), and the clear and conscious effort to reach its main target group (young people) in as relatable a way as possible (as shown with the success of the TV show, among other things).

Topic: Measuring Gender Equality and Equal Opportunities

Additional supporting measures aimed at mainstreaming equality

Equality Body: Office of the Equal Opportunities Ombudsperson, Lithuania

Ground(s)	<i>Gender, age, disability, nationality, religion, and sexual orientation, as well as their intersections.</i>
Field(s)	<i>Employment</i>
Binding?	No
Follow-up?	Yes

The Office of the Equal Opportunities Ombudsperson has been involved in the conceptualisation and implementation phases of the development of the *equality rulers*. These are assessment tools for measuring [the gender](#) and [diversity](#) equal opportunities status of an organisation and to identify existing achievements and challenges concerning diversity management and mainstreaming equal opportunities. The goal is to encourage the change in institutional (organizational) practices (i. e. “behavioural change”) based on the identified shortcomings and to raise awareness of the benefits of diversity management. The tool also makes it possible to compare the situation in different organisations. In addition, it can be used as a monitoring tool to track changes over time.

While the use of this tool is not compulsory, it is recommended for both private and public organisations that have more than 50 staff members. The tool consists of two questionnaires – one for employers and one for employees. It provides the possibility of measuring diversity and gender equality management, not only in the institutional (organisational) setting, but also among its employees, thus generating comparable results about the actual situation. Equal opportunities policy recommendations, based on the results within the specific institution or organisation, are provided by the Office of the Equal Opportunities Ombudsperson on the basis of those questionnaires. Whilst follow-up steps are not legally binding, there is a mutual agreement that if the organisation is assessing its work environment with any of the rulers, it is committed to implement further measures.

Topic: Disability Equality Training

Additional supporting measures aimed at mainstreaming equality

Equality Body: Commission for the Rights of Persons with Disability (CRPD), Malta

Ground(s) *Disability, intersectional*

Field(s) *All fields of life*

Binding? *No*

Follow-up? *Yes*

The Commission for the Rights of Persons with Disability (CRPD) provides, since its inception in 1987, [Disability Equality Training \(DET\)](#) to various public and private organisations, including employers, NGOs, governmental entities, hospitals, private companies as well as educational institutions following their mandate to do so by the UN CRPD. These trainings are delivered by trainers with disabilities and customised to each organisation.

The CRPD has a specialised unit that delivers, monitors, and evaluates the training. The trainings are customized to the needs of each organisation that requests them, and the length of it is decided accordingly. By the end of the trainings, participants would have improved their understanding of how socially constructed barriers can disable and erode the quality of life of persons with disabilities. Trainings include an introduction to key issues related to disability, provides participants with opportunities to meet individuals with disabilities, and enables participants to confront some of the root causes of the fear and prejudice that individuals and society have for persons with disabilities. Ultimately, the training help participants to develop a personal understanding and a positive image of persons with disabilities as equal and valuable members of society.

To date, the CRPD has delivered thousands of hours of custom-made training to various groups in all fields of life, including, for instance, healthcare workers, police recruits, students, schools, transport and service industry etc.

Topic: Preventing Harassment and Sexual Harassment in Higher Education

Additional supporting measures aimed at mainstreaming equality

Equality Body: The Commissioner for Human Rights, Poland

Ground(s) Gender, sexual orientation, gender identity

Field(s) Education

Binding? No

Follow-up? Yes

The Polish Commissioner for Human Rights acts under the powers conferred to the equality body under the Act on the Commissioner for Human Rights, article 17b. This article enables the Commissioner to engage in the analysis and support of equal treatment through the conduct of independent research that relates to discrimination. As a result of this research, the equality body is encouraged to develop and issue an independent report with recommendations regarding problems of discrimination. Under this mandate, the [Commissioner produced a report on harassment and sexual harassment at universities in 2018](#).

The purpose of the report was to identify the scale of harassment and sexual harassment in academia and highlight the consequences and circumstances of reporting it. The Commissioner collected data that confirmed the large scale of harassment within universities and made recommendations for duty bearers (rectors, ministries who supervise higher education schools) to help combat and prevent discrimination and to support survivors. Notably, it was the first study on harassment and sexual harassment in tertiary education that has been conducted by the Commissioner. However, it was complex as it recognised that there was a lack of appropriate anti-discriminatory legal measures to combat harassment and sexual harassment in the sphere of education based on characteristics other than racial or ethnic origin and nationality under Polish law. Therefore, it became important for the equality body to identify other anti-discriminatory legal measures as well as non-legal steps that can be undertaken to prevent and combat harassment and sexual harassment at universities.

Whilst the recommendations provided in the report are not binding, the equality body closely monitors how the recommendations are implemented. To further bolster support and raise awareness of this activity, the Commissioner attends conferences and events on the issue organized by different organizations and cooperates with different media to enhance its interest on the subject. There has been a good response to the report with numerous actions being undertaken by the rectors, such as the introduction of anti-discriminatory regulations, and the appointment of The Rector's Plenipotentiary for Equal Treatment.

Topic: Training of Magistrates to Combat Discrimination on all Grounds

Additional supporting measures aimed at mainstreaming equality

Equality Body: National Council for Combating Discrimination (NCCD), Romania

Ground(s)	<i>All grounds: race, nationality, ethnicity, language, religion, social category, beliefs, sex, sexual orientation, age, disability, non-contagious chronic disease, HIV infection, membership of a disadvantaged group and any other ground having as its object or effect the restriction</i>
Field(s)	<i>All fields</i>
Binding?	No
Follow-up?	Yes

The National Council for Combating Discrimination (NCCD), under article 16-19 of Ordinance 137/2000 on the Prevention and Sanctioning all Forms of Discrimination, is the initiator and implementer of a magistrates training program designed to combat discrimination across multiple fields and on all grounds. In partnership with the National Institute for Magistracy, the NCCD aims to find the points of interest for magistrates and to support them in elucidating cases of discrimination. The program has been running for 16 years with magistrates also belonging to various National Courts, Prosecutor's Offices, the High Court of Cassation and Justice and the National Institute of Magistracy. The [NCCD Activity Reports](#) highlight the training sessions for magistrates and the statistics for court cases whose solutions have been pronounced with the NCCD as a special expert.

Along with this training, the NCCD has ensured that magistrates are up to date on the latest anti-discrimination legislation through necessary meetings which have enabled the decisions adopted by the courts to be more accurate. Using its extensive network, the NCCD has been able to collect multiple cases that have been edited and published in NCCD reports, and their usefulness has been consistently monitored to ensure relevance. The NCCD training has resulted in the amendment of the Ordinance on the Prevention and Sanctioning all Forms of Discrimination to reflect the improvements and protection the NCCD has brought to anti-discrimination measures through its training. The Ordinance now stipulates that the trial of each case of discrimination takes place with the mandatory citation of the NCCD. In 2020, the NCCD was summoned to Court as a consultative forum, a "specialised expert of discrimination cases". During this year it formulated and administered specialised points of view for about 1533 lawsuits (from the Courts within Romania).

The programme is followed by hundreds of magistrates and the NCCD has monitored the usefulness of its program over time. Success of the programme has been attributed to the common interest of the actors for efficient and correct resolution, in accordance with national and European practice and legislation. In addition, this interest has ensured that the programme will continue to run, despite being briefly prevented by Covid-19 in 2020.

Annex 1 – Equinet template for collecting good practices

TEMPLATE: Good practices in equality mainstreaming by Equality Bodies with a focus on Equality Duties and Equality Impact assessments

Equinet: Equality Mainstreaming Cluster

In its Work Plan 2021, Equinet committed to prepare a compendium of good practices in the field of equality duties and equality impact assessments¹⁸, informing the work of equality bodies and responsible public authorities. This questionnaire is designed to collect information and good practices to feed into the compendium.

If you have any questions about this questionnaire or would like more information, please contact Sophie Hale, Membership and Network Development Officer (sophie.hale@equineteurope.org)

Please copy and paste this template for each practice you would like to share (use one template per good practice).

RESPONDENT'S DATA

Equality Body:

Country:

*We may need to follow-up with members who give us these good practice examples to check the details are correct. Therefore, we would appreciate it if you could give us the name and contact details of a relevant person in your equality body **who knows about this example**. Furthermore, **we plan on naming this contact person in the compendium to facilitate getting in touch**, should a reader of the compendium wish to find out more about the good practice.*

Contact Name:

Contact Email:

¹⁸ **Equality duty** - Statutory equality duties may be defined as positive legal obligations to promote equality and prevent discrimination, going beyond the general obligation to refrain from discrimination. Equinet's study [Making Europe More Equal: A Legal Duty?](#), commissioned in 2016, concluded that there are three main categories of statutory duties in place in Europe; preventive, institutional and mainstreaming duties. Preventive duties are statutory duties on organisations (public and private) to take measures to prevent discrimination, harassment or sexual harassment in employment or in the provision of good and services. Institutional duties are statutory duties on organisations (public and private) to promote equality for employees or for people accessing their services. Mainstreaming duties require public authorities to have due regard to the need to promote equality in in carrying out their functions, including legislating, budgeting, regulating, and policy making.

Equality impact assessment - An equality impact assessment is a systematic way of finding out whether a function, such as a policy or practice, has a different impact on particular communities, or groups within communities. Equality impact assessments can be used to determine disadvantage for any groups protected by equality legislation.

MANDATE

Is there a legal mandate for your Equality Body to work/ be involved in **equality duties and equality impact assessments**, and what grounds and fields of life does it cover?

In the absence of an explicit legal provision to work or be involved in **equality duties and equality impact assessments**, has the mandate of your Equality Body been interpreted widely to cover these areas? If so, what grounds and fields of life do you cover?

GOOD PRACTICE EXAMPLE

We are primarily interested in good practices where your equality body plays a specific role (e.g. monitoring, advising duty bearers, or as a duty bearer itself).

Please choose which area the practice will cover:

1. **Equality duty** - Statutory equality duties may be defined as positive legal obligations to promote equality and prevent discrimination, going beyond the general obligation to refrain from discrimination. Equinet's study '[Making Europe More Equal: A Legal Duty?](#)', commissioned in 2016, concluded that there are three main categories of statutory duties in place in Europe; preventive, institutional and mainstreaming duties. Preventive duties are statutory duties on organisations (public and private) to take measures to prevent discrimination, harassment or sexual harassment in employment or in the provision of good and services. Institutional duties are statutory duties on organisations (public and private) to promote equality for employees or for people accessing their services. Mainstreaming duties require public authorities to have due regard to the need to promote equality in carrying out their functions, including legislating, budgeting, regulating, and policy making.

OR

2. **Equality impact assessment** - An equality impact assessment is a systematic way of finding out whether a function, such as a policy or practice, has a different impact on particular communities, or groups within communities. Equality impact assessments can be used to determine disadvantage for any groups protected by equality legislation.

This good practice will cover:

- Duty bearers, in the case of equality duties

OR

- Body conducting the equality impact assessment (please add whether it is a private or public entity or entities)¹⁹

Please add a brief description of the practice

¹⁹ We note that in some cases conducting an equality impact assessment may in itself be an equality duty.

Ground(s) covered (gender, race, disability, horizontal, etc.)

Eventual points of attention with respect to intersectionality

Field(s) covered (employment, access to goods and service, education, etc.)

Role of the EB

- In which phase was your equality body involved (conceptualisation, implementation, or monitoring)?
- What did the role involve?
- Did it lead to a binding decision/assessment from your equality body?
- Did you cooperate with any organisation/ institution with a view to the proper implementation of the equality duty/equality impact assessment?

Are there any sanctions foreseen if the equality duty is not discharged or if the findings of the equality impact assessment are not followed?

Do you consider this a good practice? Why was it successful, or not?

Was there any ex-post evaluation of impact?

Could you identify the key challenges in this practice?

What helped to overcome those challenges?

Please add links to any reference(s), if available, to the practice you shared above (publication, website, any other publication, etc.)

Thank you very much for completing this questionnaire. Please return it by email to Sophie Hale, Membership and Network Development Officer (sophie.hale@equineteurope.org).

Equinet Member Equality Bodies

ALBANIA

Commissioner for the Protection from Discrimination
www.kmd.al

AUSTRIA

Austrian Disability Ombudsman
www.behindertenanwalt.gov.at

AUSTRIA

Ombud for Equal Treatment
www.gleichbehandlungsanwaltschaft.gov.at

BELGIUM

Institute for the Equality of Women and Men
www.igvm-iefh.belgium.be

BELGIUM

Unia (Interfederal Centre for Equal Opportunities)
www.unia.be

BOSNIA AND HERZEGOVINA

Institution of Human Rights Ombudsman of Bosnia and Herzegovina
www.ombudsmen.gov.ba

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

CROATIA

Ombudswoman for Persons with Disabilities
www.posi.hr

CYPRUS

Commissioner for Administration and Human Rights (Ombudsman)
www.ombudsman.gov.cy

CZECH REPUBLIC

Public Defender of Rights
www.ochrance.cz

DENMARK

Danish Institute for Human Rights
www.humanrights.dk

ESTONIA

Gender Equality and Equal Treatment Commissioner
www.volinik.ee

FINLAND

Non-Discrimination Ombudsman
www.syrjinta.fi

FINLAND

Ombudsman for Equality
www.tasa-arvo.fi

FRANCE

Defender of Rights
www.defenseurdesdroits.fr

GEORGIA

Public Defender of Georgia (Ombudsman)
www.ombudsman.ge

GERMANY

Federal Anti-Discrimination Agency
www.antidiskriminierungsstelle.de

GREECE

Greek Ombudsman
www.synigoros.gr

HUNGARY

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

IRELAND

Irish Human Rights and Equality Commission
www.ihrec.ie

ITALY

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

KOSOVO*

Ombudsperson Institution
www.oik-rks.org

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

MALTA

Commission for the Rights of Persons with Disability
www.crpdp.org.mt

MALTA

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

MOLDOVA

Council on Preventing and Eliminating Discrimination and Ensuring Equality
www.egalitate.md

MONTENEGRO

Protector of Human Rights and Freedoms (Ombudsman)
www.ombudsman.co.me

NETHERLANDS

Netherlands Institute for Human Rights
www.mensenrechten.nl

NORTH MACEDONIA

Commission for Prevention and Protection against Discrimination
www.kszd.mk

NORWAY

Equality and Anti-Discrimination Ombud
www.ldo.no

POLAND

Commissioner for Human Rights
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.acm.gov.pt

ROMANIA

National Council for Combating Discrimination
www.cncd.ro

SERBIA

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

SLOVAKIA

Slovak National Centre for Human Rights
www.snslp.sk

SLOVENIA

Advocate of the Principle of Equality
www.zagovornik.si

SPAIN

Council for the Elimination of Ethnic or Racial Discrimination
www.igualdadynodiscriminacion.igualdad.gob.es

SPAIN

Institute of Women
www.inmujer.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

** This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.*



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