



AN EQUINET
PERSPECTIVE

EU Equality Strategies: Replacement and Renewal

by Niall Crowley

2024



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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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1. Introduction

1.1 Background

A range of EU equality strategies adopted within the [Union of Equality - European Commission](#) framework are coming to the end of or mid-term review of their lifecycle in 2025. These include:

- [LGBTIQ Equality Strategy](#) 2020-2025
- [Gender Equality Strategy](#) 2020-2025
- [EU Anti-Racism Action Plan](#) 2020-2025
- [EU Roma strategic framework for equality, inclusion, and participation](#) 2020-2030
- [Strategy for the Rights of Persons with Disabilities](#) 2021-2030
- [EU Strategy and Combating Antisemitism and Fostering Jewish Life](#) 2021-2030

The strategies that are coming to the end of their lifecycle would need to be replaced. Those that are at their mid-term point would need to be reviewed and potentially renewed.

Equality Bodies emphasise the value of these EU equality strategies in strengthening commitment to equality and guiding progress on the achievement of equality at the Member State level. This contribution is seen as ever more important in the current context of the growth of extremism and the threats posed to EU values of equality and non-discrimination.

1.2 Equinet Perspective

This perspective has been developed to inform the replacement and review of these EU equality strategies, based on the experience of Equality Bodies in engaging at national level on the implementation of these strategies and based on insights from the wider work of Equality Bodies in fulfilling their mandates.

The preparation of this perspective involved:

- debates at an Equinet Policy Formation Working Group meeting, which draws its membership from all member Equality Bodies;
- a membership survey that was completed by sixteen Equality Bodies in thirteen jurisdictions, with a further Equality Body providing a separate submission¹; and
- review of the draft perspective by the Policy Formation Working Group members and then discussion on and finalisation of the perspective by the Equinet board.

¹ Austrian Disability Ombudsperson, Austria; Institute for the Equality of Women and Men, Belgium; UNIA, Belgium; Office of the Ombudswoman of the Republic of Croatia; Ombudsman for Persons with Disabilities, Croatia; Ombudsperson for Gender Equality, Croatia; Office of the Public Defender of Rights in the Czech Republic; Federal Anti-Discrimination Agency in Germany; Irish Human Rights and Equality Commission in Ireland; Office of the Equal Opportunities Ombudsperson in Lithuania; National Commission for the Promotion of Equality, Malta; Equality Commission Northern Ireland, National Council for Combating Discrimination, Romania; Commissioner for Protection of Equality, Serbia; Slovak National Centre for Human Rights, Slovak Republic; and Swedish Equality Ombudsman, Sweden, with the Commission for Citizenship and Gender Equality from Portugal making a specific submission.



2. Equality Body involvement in current Equality Strategies

2.1 Equality Body engagement with EU and national Equality Strategies

Equality Body engagement with EU equality strategies is based on the implementation at the national level of the EU equality strategies. In this, the link between national equality strategies and the EU equality strategies is not clearly established in all instances. The involvement of Equality Bodies in national equality strategies, where it happens, is noted as part of the policy advice function and of the promotion of equality function of an Equality Body. Such engagement by national authorities with Equality Bodies on national equality strategies, rests on a recognition of the specialist expertise and experience that Equality Bodies bring to the process.

Equality Bodies report a range of approaches to engaging with these equality strategies at Member State level, both formal and informal. Informal engagement arises as part of contacts made with the authorities within the wider policy advice and policy monitoring function of the Equality Body. Equality Body interventions of a formal nature are noted in particular:

- (1) in the development of these national equality strategies;
- (2) to some extent in their implementation, and;
- (3) to a lesser extent, in their monitoring and evaluation.

Many Equality Bodies identify that, while there are issues faced, this involvement has largely been positive and has enabled impact to be made by Equality Bodies. This experience of Equality Bodies can vary across particular strategies, with some reflecting positive involvement, but others being less constructive.

The Equality Body intervention can take place through:

- involvement in direct consultation and exchange meetings with national authorities;
- engagement in public consultation;
- provision of feedback on drafts of the national equality strategy;
- membership of dedicated working groups or committees that support these national equality strategies;
- participation in actions to support monitoring and evaluation, and;
- participation in monitoring committees established for these national equality strategies.

Practices of interest...

In the United Kingdom (Northern Ireland), the [Equality Commission Northern Ireland](#) participated in a co-design process established for three equality strategies. The terms of reference for the co-design group set its role as including to support and advise the lead Department on the development and content of draft Strategies, supporting action plans and monitoring and reporting mechanisms; and to help the Department understand the experience of, and issues faced by, people for whom the strategies will deliver. Final decisions on the strategies rest with the lead Department.

The co-design process gave the equality body and other stakeholders an opportunity to provide input to the strategy and highlight / share evidence regarding key inequalities and proposed actions. However, the approach was considered by stakeholders to largely be one-sided, to date

with a lack of access to resultant draft proposals and, thus, no opportunity to shape/refine any proposals. The work is running significantly behind schedule and is yet to be completed.

In Belgium, CSO's, and in particular the National High Council for People with Disabilities (NHCPD), alongside Unia were consulted for the drafting of the National Action Plan for People with Disabilities (2021-2024), which consists of 145 actions including 46 priority flagship-actions. Unia and the NHCPD were given the mandate to produce a thorough evaluation of the progress of the action plan on the two instances of formal evaluation, a midterm evaluation and a final evaluation. Both evaluations started with a conference bringing together administration and government representatives, CSO', the NHCPD and Unia for a discussion on the monitoring by the administration and the official reactions of the NHCPD and Unia. Unia produced an in-depth evaluation of the plan during the mid-term review. The midterm evaluation was discussed both in parliament and on the level of the government. The final evaluation also identified steps to be taken by the next action plan.

Equality Bodies have also been involved in playing roles and implementing specific actions set down in or supportive of these national equality strategies and their action plans, that are related to their functions, and in actions to build capacity of relevant institutions to implement actions they are assigned, in particular through provision of training and guidance. Many Equality Bodies see monitoring and evaluation as a task for the national authorities, though some view involvement in these as a means of driving policy implementation.

Practices of interest...

In Germany, the Federal Anti-Discrimination Agency (FADA) initiated a participatory dialogue process, as part of the implementation of the EU Roma Strategy, with civil society organisations to explore the possibilities and conditions for collecting data on the living situation and experiences of discrimination of Sinti and Roma (e.g. in community-based surveys). The equality body also funded two research projects in order to investigate 'antigypsyism' with a focus on discrimination against Sinti and Roma. Beyond the implementation of the EU Roma Strategy and to more comprehensively address 'antigypsyism', the equality body launched two further research projects to analyse the risks of discrimination and protection against discrimination in the police and justice sector.

In Malta, the National Commission for the Promotion of Equality (NCPE) participated in the implementation of measures related to the national Anti-Racism Strategy 2021 – 2023, including: revision of each draft Intra-Ministerial Anti-Racism Action Plan and provision of recommendations on how planned anti-racist measures can be strengthened across the different areas of Government action; participation in the Inter-Ministerial Committee on Anti-Racism that discussed the drafting and implementation of the Intra-Ministerial Anti-Racism Action Plans, among other measures related to the national anti-racism strategy; development of an Anti-Racism Policymaking Tool that aims to aid public officers in developing and executing policies capable of preventing unlawful discrimination and harassment, as well as to bring about structural changes that address racial inequalities in their different social and economic manifestations; and provision of training sessions on the effective use of the Anti-Racism

Policymaking Tool to public officers tasked with the design, implementation and monitoring of policies.

In Sweden, the Equality Ombudsman received several government assignments linked to national strategies or the action plans developed to realise the equality strategies. Such assignments are developed in dialogue with the equality body. These have included: the development of a situational report on the conditions of intersex persons from a discrimination perspective under the Action Plan for Equal Rights and Opportunities for LGBTIQI persons; and action to increase knowledge about the occurrence of discrimination related to religion or other beliefs and how it interacts with discrimination based on ethnic origin under the Action Plan Against Islamophobia.

Equality Bodies emphasise the need to protect and give expression to their independence in engaging with these national equality strategies both from the administration, as well as other external influences. Some Equality Bodies report a tendency for national authorities to view the Equality Bodies as part of the administration with roles to be allocated to them in implementing national equality strategies. Similarly, Equality Bodies note that there can be a tendency for civil society organisations, whose contribution is not being adequately engaged by the national authorities, to seek for the Equality Body to champion their perspective. This can be a difficult terrain for Equality Bodies to navigate from an independence perspective. The concern to maintain independence has meant that some Equality Bodies have not got involved in these national equality strategies.

Involvement in the national equality strategies is enabled where Equality Bodies have the resources for a policy department. However, lack of resources is noted by many Equality Bodies as a barrier to effective engagement with these equality strategies.

A small number of Equality Bodies were precluded from engaging for lack of resources and other Equality Bodies identified that their participation was limited by lack of resources. The inadequate resourcing of Equality Bodies needs to be addressed if they are to make their full contribution to these equality strategies. Prior to engaging within the process, Equality Bodies have to take stock of their available resources, as a prior step to deciding on the nature and scale of their engagement.

Equality Bodies point to a positive value in the capacity of EU equality strategies to influence national commitment to and action on equality. They note positive developments for the different grounds addressed, as a result of the effective implementation of national equality strategies. This provides the rationale for their engagement with these strategies at national level.

However, there is concern noted by many Equality Bodies at the overall low level of influence they are enabled to have on the process for and content of national equality strategies. In particular, some Equality Bodies note that many of their proposals are not taken up in the development of these national equality strategies. These equality bodies further note a lack of feedback on the reasoning why proposals have not been taken on board. In some instances, Equality Bodies were not invited to be involved by member states in the first place. Involvement from a pre-consultation phase and in processes of real co-design are noted as important.

Overall, the importance of full and effective implementation of the EU Directives on Standards for Equality Bodies is emphasised by Equality Bodies, if their involvement in and contribution to national equality strategies is to be effective. In particular in this regard, those articles addressing Equality

Body independence, Equality Body resources, consultation with Equality Bodies, and Equality Body powers to make recommendations in relation to the collection of equality data are key.²

Equality Bodies suggest that new and reviewed EU equality strategies would make reference to the full and effective transposition and implementation of these Directives, to ensure effective participation by Equality Bodies that respects their independence in the various phases of developing, implementing and reviewing national equality strategies. Further, the EU equality strategies could specifically identify Equality Bodies as key stakeholders to be fully involved in all phases of national equality strategies in a manner that is meaningful and that respects their independence.

There is limited Equality Body engagement noted at EU level in relation to these equality strategies. Equality Bodies point to a potential in such involvement through Equinet, and through their involvement in European Commission structures such as the Advisory Committee on Equal Opportunities for Women and Men, and the High-Level Group on Non-Discrimination, Equality and Diversity. A specific initiative by the European Commission to meet with Equality Bodies as part of the preparation or review of EU equality strategies was suggested to broaden and enhance Equality Body involvement.

2.2 Equality Body analysis of the development, implementation and review of national equality strategies

Equality Bodies point to a number of issues with the process of developing national equality strategies. It is noted that, in some instances, no national equality strategy is developed or there is a long delay in the development of a national equality strategy after its predecessor has expired. In such cases, Equality Bodies have made recommendations for the development of such national equality strategies as part of their policy advice function.

Participative approaches are emphasised by Equality Bodies as a recommendation for Member States in the development of national equality strategies. Participation by the affected target group for these strategies is central, but a number of Equality Bodies point to examples where this is lacking. In other instances, limited forms of consultation are noted, restricted to a general call for inputs and without any feedback to the targeted groups and their representative organisations in relation to inputs made.

Co-design is noted as key for an effective national equality strategy, involving targeted groups and their representative civil society organisations, and involving the Equality Body. Co-design needs to be an ongoing process through the various drafting stages to the point of finalising the national equality strategy. Power imbalances, in particular for civil society organisations, in such engagement with the national authorities need to be addressed.

² See: [Directive \(EU\) 2024/1500 on standards for Equality Bodies in the field of equal treatment and equal opportunities between women and men in matters of employment and occupation, and amending Directives 2006/54/EC and 2010/41/EU](#), and; [Directive \(EU\) 2024/1499 on standards for Equality Bodies in the field of equal treatment between persons irrespective of their racial or ethnic origin, equal treatment in the field of employment and occupation between persons irrespective of their religion or belief, disability, age or sexual orientation, equal treatment between women and men in matters of social security and in the access to and supply of goods and services, and amending Directives 2000/43/EC and 2004/113/EC](#).

There are issues noted by Equality Bodies in relation to the **content of national equality strategies**. Equality Bodies reported a lack of ambition, in a number of instances, in the goals established for national equality strategies and in the level of resources allocated for their implementation.

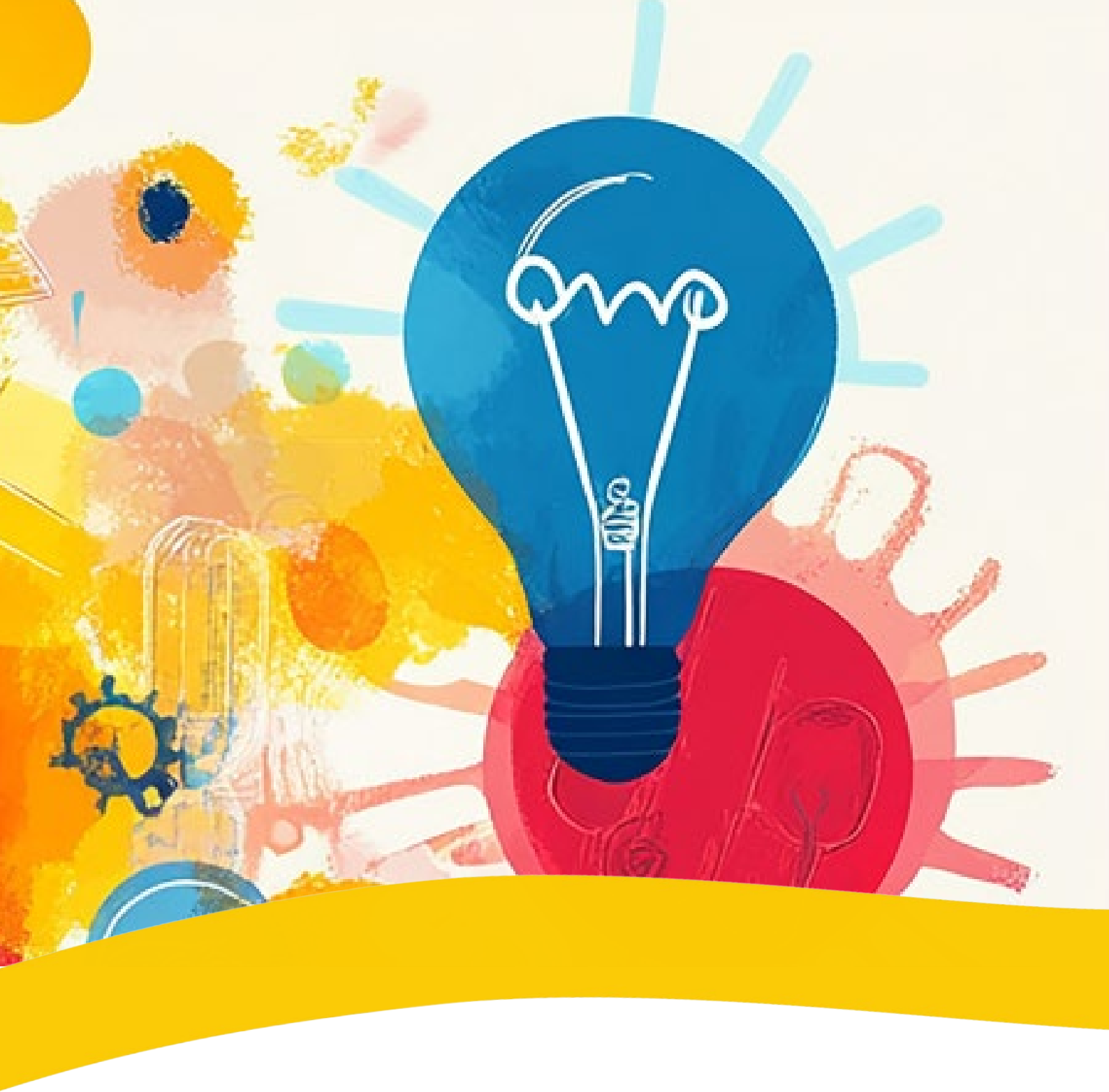
Actions can be limited to what public institutions are already doing or already have to do under national legislation. There can be an over-emphasis on processes, and a lack of focus on action and making an impact. There can be a lack of focus on issues of discrimination and rights. Ambition can be higher in the lead department or ministry, with other departments or ministries presented fewer actions and with less potential.

In particular Equality Bodies noted issues in relation to **the implementation of national equality strategies**. This can take the form of lack of investment, with inadequate resources being made available for the national equality strategy. Political and administrative commitment to its implementation may be lacking. Another issue entails interruptions due to political change at national level. There can, further, be an inadequate institutional infrastructure to drive implementation, including a lack of coordination across public institutions involved and a lack of effective monitoring and evaluation.

There is a challenge evident in moving from national level plans to regional and local level initiative to drive implementation. A number of Equality Bodies point to issues of policy implementation failure. National equality strategies can serve to cover inaction when it comes to equality initiatives in such contexts where public commitments are made at national level but there is a failure to implement change on the ground.

There needs to be a focus on policy implementation barriers and an understanding of what is needed to be done to address these, and a requirement to address these. Equality Bodies can be a valuable independent advocate for full and effective implementation of national equality strategies. A small number of Equality Bodies point to significant progress made pursuant to roles played in monitoring implementation and making recommendations in relation to implementation barriers and lack of implementation.

Equality Bodies note instances of inadequate **monitoring and evaluation systems** for national equality strategies, failure to set targets that can be evaluated, inadequacy of indicator sets and failure to establish these contemporaneously with the strategy, and inadequacy of equality data collection to track such targets and measure such indicators. More generally, a need to strengthen reporting arrangements is noted, and to establish an independent monitoring and evaluation process. In relation to these issues, some Equality Bodies have been involved in developing and proposing indicators for use in national equality strategies. Other Equality Bodies have engaged in research and data gathering initiatives to inform monitoring and evaluation. Some Equality Bodies have engaged with independent evaluation exercises that have been undertaken.



3. Looking Forward

3.1 Umbrella Equality Strategy

There is **potential** noted by most Equality Bodies in having an overarching umbrella equality strategy at EU level, and similarly at national level. Such a strategy would enable a more consistent approach, ensuring all grounds are covered comprehensively and coherently, and in addressing intersectionality across the grounds. It would establish that equality for all, on all grounds, is a political priority for the EU and the Member States rooted in EU values of respect for human dignity, equality, and respect for human rights.

Such an approach would underpin a more collaborative approach with greater coordination of effort across institutions and coherence of intervention across the different grounds. It would focus and maximise the deployment of necessary resources. It would reduce competition for resources between the grounds, and empower representative associations in reducing fragmentation and division. It would provide space to comprehensively address the role of Equality Bodies and ensure their potential is enhanced by these strategies and their contribution to these strategies is maximized.

However, there are **risks** noted by Equality Bodies in such an umbrella equality strategy in particular if not approached with the requisite ambition, but used as a replacement for ground specific equality strategies. The different objectives, legislative and policy frameworks, and specific needs that pertain for each ground, could be ignored, with detrimental consequences. The effectiveness of initiatives required to address specific and complex issues for individual grounds could be undermined, with generic responses advanced. A single umbrella equality strategy could become an administrative nightmare with such a large portfolio of issues to be addressed, and implementation could be compromised as a result.

As such, it is suggested by Equality Bodies that an umbrella equality strategy could be developed and would be accompanied by, or form a common chapter for, ground specific equality strategies. This approach would secure the potential of an overarching perspective while ensuring any consequential risks in a single umbrella equality strategy are removed.

An umbrella equality strategy, it is suggested by Equality Bodies, would address overarching priorities and cross-cutting issues. It would:

- Establish **shared ambition and goals** for achieving equality of outcomes and eliminating discrimination across all grounds. Values could be deployed as a frame for establishing this shared ambition at EU and national levels. The values inspiring this goal would be identified and defined and their implications established for what equality strategies would achieve. These values could provide the ambition and frame for ground-specific equality strategies.
- Identify actions to be taken for **an effective equality and non-discrimination infrastructure** addressing all grounds. This would include actions to:
 - **strengthen and evolve equality-related legislation** at EU and Member State levels, including effective transposition and implementation processes at Member State level of recent and future equality-related EU Directives;
 - **establish and sustain structures for driving progress** on equality at national level, including effective coordination structures for the relevant public institutions, and

effective participative structures to involve all stakeholders in progressing equality and non-discrimination;

- build capacity within public institutions to understand, know about, and address issues of equality, diversity, and non-discrimination, including through effective equality mainstreaming measures;
 - develop and progress equality strategies, based on the work of the Equality Data Subgroup of the High-Level Group on Non-Discrimination, Equality, and Diversity;
 - secure the independence and effectiveness of Equality Bodies, including by effective transposition and implementation of the Directives on Standards for Equality Bodies;
 - empower rights-holders including through action to build confidence and trust in equal treatment provisions and secure access to the institutions responsible for their implementation, and to build an awareness of rights and how to exercise them, reducing the current high levels of under-reporting;
 - support and enable effective access to justice under equality legislation, with a particular focus on addressing under-reporting of discrimination, sexual harassment, and harassment;
 - define, support and secure implementation of policy processes such as: effective equality mainstreaming processes focused on the achievement of full equality in practice, and underpinned by statutory equality duties; and effective gathering and analysis of equality data; and
 - strengthen investment in equality and non-discrimination at EU and Member State levels, including a strengthened focus on the use of EU Funds to secure implementation of EU equality strategies at Member State Level.
- Establish and address overarching priorities across the grounds that would be, and benefit from being, a focus for multi-ground interventions. This could include actions on:
 - new challenges for advancing equality in addressing digital inequality, algorithmic discrimination, the Artificial Intelligence shaped labour market;
 - new challenges for advancing equality in responding to climate change and advancing a green and just transition;
 - economic discrimination, disadvantage, and inequality;
 - systems for reasonable accommodation and sustaining a culture of adaptability and responsiveness, such that organisations in the public and private sectors make adjustments and adaptations for specific needs to secure access and participation both for persons with disabilities, as required under law, and for people from all the discrimination grounds³;

³ For further detail on approaches to such comprehensive reasonable accommodation see: 'Equality Bodies and Reasonable Accommodation Beyond the Ground of Disability, Equinet, 2022.

- effective responses to hate crime and hate speech;
- supporting and resourcing autonomous and effective representative associations across all grounds; and
- intersectionality, building understanding of what this is and how it is to be addressed across the grounds, and implementing a programme of intersectional initiatives.

It would be important for the European Commission to make provisions to ensure the effective development, implementation, monitoring and evaluation of the umbrella equality strategy and the ground specific equality strategies. This could include:

- a requirement on Member States to have plans in place to give effect to the EU equality strategies across all grounds, based on targets that can be tracked and evaluated, and involving a process of co-design that would include civil society organisations and Equality Bodies;
- seeking a mix of mainstreaming measures, in adapting general provisions to secure outcomes, and targeted measures, in directly addressing disadvantages on the grounds, setting out an approach to implementation that reaches into the regional and local levels, with adequate safeguards to prevent, and address as needed, policy implementation failures;
- seeking effective implementation structures and processes, including identification and resourcing of a lead department to drive each strategy; responsibility for equality and for leadership on equality and implementation of each strategy across all departments involved, and ongoing stakeholder involvement;
- seeking adequate and appropriate investment to ensure implementation and impact of each;
- ensuring adequate equality data collection; independent, effective and participative monitoring mechanisms and evaluation systems; and systematic learning and improvement secured from these mechanisms and systems; and
- making provision to recognise that the European Parliament could call the Member States to report on developments in regard to their implementation of EU equality strategies.

3.2 Issues for Ground-Specific Equality Strategies

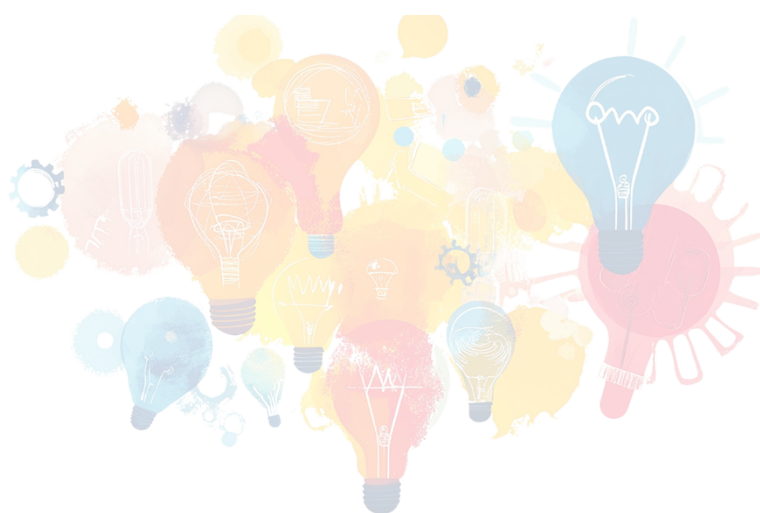
Where there is no umbrella equality strategy, the above actions need to be included in the replacement and renewal of the full range of EU equality strategies in a horizontal manner.

There are further actions noted from the work and experience of Equality Bodies as being required in the ground-specific equality strategies.

3.2.1 Strategy for the Rights of Persons with Disabilities

In reviewing and renewing the flagship initiatives for the Strategy for the Rights of Persons with Disabilities, there is a need to include for action, among others, to:

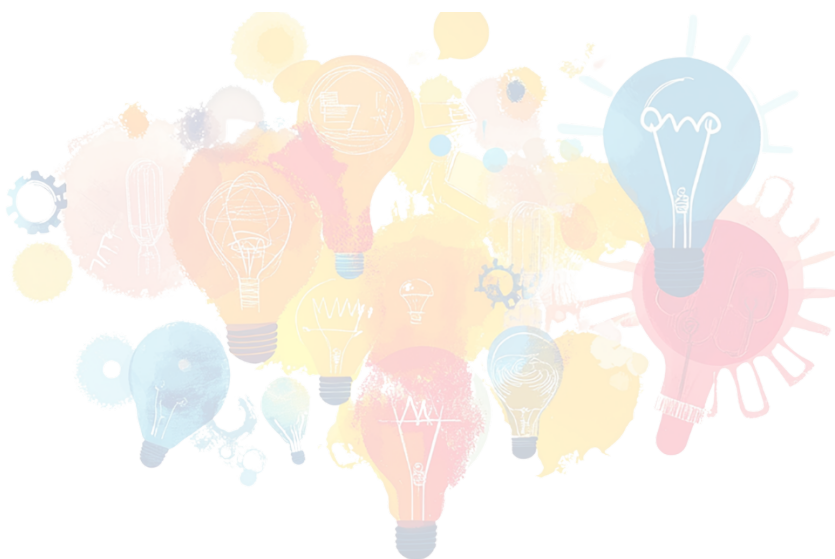
- 💡 secure accessible and affordable accommodation for people with disabilities;
- 💡 address the imperative of de-institutionalisation which continues to be a significant challenge;
- 💡 invest in and support community-based support services for people with disabilities;
- 💡 address high levels of unemployment, supporting access to decent work and progression within the workplace, taking positive action as required to achieve outcomes;
- 💡 address educational disadvantage, supporting access to and attainment within mainstream education provision, taking positive action as required to achieve outcomes;
- 💡 address digital inequalities and ensure digital accessibility;
- 💡 promote and advance participation and influence in public and political life;
- 💡 ensure institutional protection mechanisms are known and used by persons with disabilities and Disabled People's Organisations (DPOs),
- 💡 make visible, prevent and address violence against people with disabilities; and
- 💡 invest in and support the emergence and growth of DPOs, as defined under the UNCRPD.



3.2.2 LGBTIQ Equality Strategy










In replacing the LGBTIQ Equality Strategy, there is a need to ensure action, among others, to:

- 💡 strengthen the legal protections for LGBTIQ people, in particular in relation to discrimination, harassment, hate speech, cyber abuse, and hate crime;
- 💡 effectively address the high levels of under-reporting of such issues;
- 💡 secure appropriate and equal treatment of LGBTIQ people within provision of healthcare, social services, housing and labour market;
- 💡 improve the standing and situation of, and the range and level of services for, trans people and intersex people, including ensuring access to trans-affirmative healthcare that does not pathologize trans identities;
- 💡 ensure legal gender recognition for trans people;
- 💡 promote the safety and wellbeing of LGBTIQ youth by addressing school bullying and violence, ensuring effective reporting channels, and providing the school community (teachers and staff) with the knowledge, tools, and support needed to identify, intervene, and combat discrimination of LGBTIQ youth; and
- 💡 secure adequate financial and institutional support for LGBTIQ representative organisations.



3.2.4 Gender Equality Strategy

In replacing the Gender Equality Strategy, there is a need to ensure action, among others, to:

-  address women's financial independence, labour market equality, and economic empowerment, including a focus on eliminating pay gaps, pension gaps, low and precarious income, and horizontal and vertical segregation on the labour market, and taking positive action as required to achieve outcomes;
-  further promote gender mainstreaming at EU and national level with a particular focus on gender equality challenges in health, digitalisation and evolution of artificial intelligence (AI) and the context of the green transition.
-  drive an ambitious transposition of the Pay Transparency Directive⁴ and support its effective implementation.
-  address the undervaluing of care work, gender segregation and low pay in the field of paid care work, and the unequal sharing of care work between women and men;
-  review the standard of transposition of the work-life balance Directive across the Member States and support its effective implementation⁵.
-  further tackle gender stereotypes affecting both women and men in different spheres of life, including career choices, sharing care responsibilities and decision-making.
-  prevent, ensure legal action to respond, and provide supports for victims of gender-based violence, alongside effective transposition and implementation of the Directive on Combating Violence Against Women and Domestic Violence, ratification of the Istanbul Convention across the Member States, and including a specific focus on eliminating sexual harassment at work and in education, and digital sexual violence;
-  progress gender balance in leadership positions, in politics and in the economy, taking positive action as required to achieve outcomes; and
-  review the standard of transposition of the women on company board Directive across the Member States and support its effective implementation⁶.

⁴ Directive (EU) 2023/970 of the European Parliament and of the Council of 10 May 2023 to strengthen the application of the principle of equal pay for equal work or work of equal value between men and women through pay transparency and enforcement mechanisms.

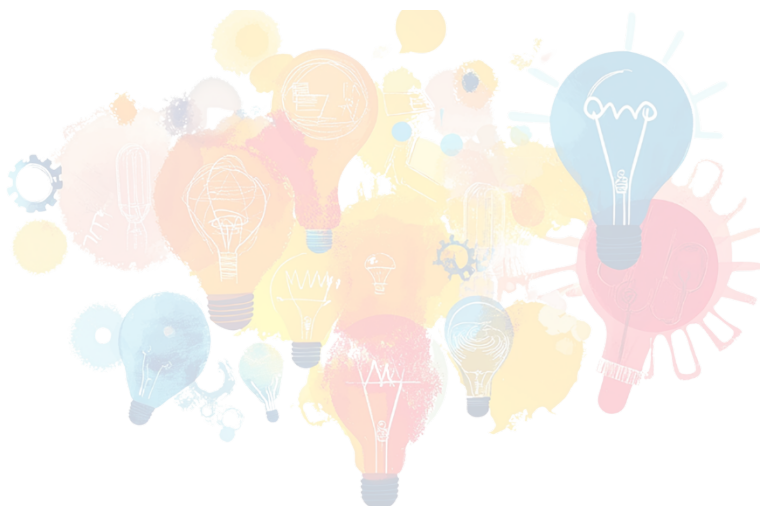
⁵ Directive (EU) 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance for parents and carers and repealing Council Directive 2010/18/EU.

⁶ Directive (EU) 2022/2381 of the European Parliament and of the Council of 23 November 2022 on improving the gender balance among directors of listed companies and related measure.

3.2.7 EU Anti-Racism Action Plan









In replacing the EU Anti-Racism Action Plan, there is a need to secure action, among others, to:

- 💡 secure a wider understanding of all forms of structural racism, commitment to address it, and effective interventions to dismantle all its forms;
- 💡 address labour market disadvantage, including underemployment and precarious employment, and eliminate discrimination and harassment, taking positive action as required to achieve outcomes;
- 💡 address education provision to ensure educational establishments are free from discrimination (including segregation) and harassment, and make appropriate provision for a diversity of cultures, histories and traditions;
- 💡 address policing standards and police capacity to eliminate all forms of profiling, discrimination and harassment experienced by Black and minority ethnic people and ensure Member States to extend the equality body's mandate to actions by law enforcement;
- 💡 develop and implement effective models for intercultural integration;
- 💡 foster and secure a more positive public narrative on migration, including through education programmes, values-led communication initiatives, and public campaigns;
- 💡 address hate speech and hate crime, ensuring high levels of reporting; and
- 💡 track and counter growing Islamophobia and anti-Muslim hate.






3.2.6 EU Roma strategic framework

In reviewing and renewing the EU Roma strategic framework for equality, inclusion, and participation, there is a need to include for action, among others, to:

-  secure a wider understanding of all forms of structural racism, commitment to address it, and effective interventions to dismantle all its forms as experienced by Roma;
-  prevent and eliminate all forms of 'antigypsyism';
-  promote knowledge and understanding of the Roma Holocaust;
-  secure access to affordable, adequate and appropriate accommodation for Roma and Travellers, without any form of segregation;
-  address and eliminate segregation in education, and support access to and attainment in education, with a particular focus on education and empowerment for Roma girls, and taking positive action as required to achieve outcomes;
-  secure the development and implementation of an effective response to the health inequalities experienced by Roma;
-  secure access to decent work and progress within the workplace, taking positive action as required to achieve outcomes; and
-  promote a more positive social environment for Roma and Travellers, free from discrimination, harassment, stereotyping and stigmatisation.







3.2.3 EU Strategy and Combating Antisemitism and Fostering Jewish Life

In reviewing and renewing the EU Strategy and Combating Antisemitism and Fostering Jewish Life, there is a need to include for action, among others, to:

-  deepen historical knowledge of the holocaust, in a context of insistent and increasing holocaust denial;
-  address hate speech and hate crime and enable reporting of this with an adequate response to incidents reported;
-  develop education programmes and public campaigns to address antisemitism.

3.2.5 Additional Equality Strategy: Age

In looking to additional equality strategies, Equality Bodies emphasise a clear and urgent gap to be filled in the absence of any equality strategy on the age ground. Such a strategy needs to:

-  look beyond a focus on social care to focus action on underpinning the autonomy, dignity, participation and active contribution of older people;
-  pursue a particular focus on dismantling cultures of ageism and stereotypes of and discrimination against older people; and
-  strengthen the legal framework on protection from discrimination on the age ground to cover all fields beyond employment;
-  ensure access to employment, gradual forms of retirement, and access to lifelong learning are needed, taking positive action as required to achieve outcomes;
-  recognize the digital divide and unequal access to ICT among older people, particularly in accessing goods and services online, including public services. Provide alternative access routes for older people within digitalisation programmes for service provision and develop individually tailored, learner-centred training programmes on ICT for older people; and
-  commit to the EU taking on a leading role in development of a UN Convention on Ageing, with the completion by the Open-Ended Working Group on Ageing of its work and its proposal for such a UN Convention.

Based on the EU Charter of Fundamental Rights, a socio-economic ground equality strategy could be developed, or this could be included as a focus within an intersectional approach across all equality strategies.

There could usefully be an equality strategy on national minorities and indigenous people or make special reference in existing strategies, including through the intersectional lens.



4. Conclusions

EU equality strategies strengthen commitment to equality and guide progress on the achievement of equality at the Member State level. As such it is vital that the current range of EU equality strategies are replaced on completion, renewed as part of their mid-term review, and expanded, in particular to encompass the age ground. Implementation of these EU equality strategies should be mandatory at Member State level by way of developing and implementing matching national equality strategies.

Equality Body involvement in the equality strategies, in a manner that is meaningful and respects their independence, should be secured at Member State level, given their policy advice and promotion of equality functions, and given the particular expertise, perspective and experience they have to contribute. Likewise, Equality Body involvement at EU level could be broadened and enhanced, both through Equinet and by way of a dedicated meeting of the relevant Commission officials with Equality Bodies.

The ambitious and effective transposition and implementation of the EU Directives on Standards for Equality Bodies should be a key action in the EU equality strategies and reflected in national equality strategies, to enable this contribution and to realise the full potential of equality bodies in advancing the achievement of full equality in practice and the elimination of discrimination across all grounds.

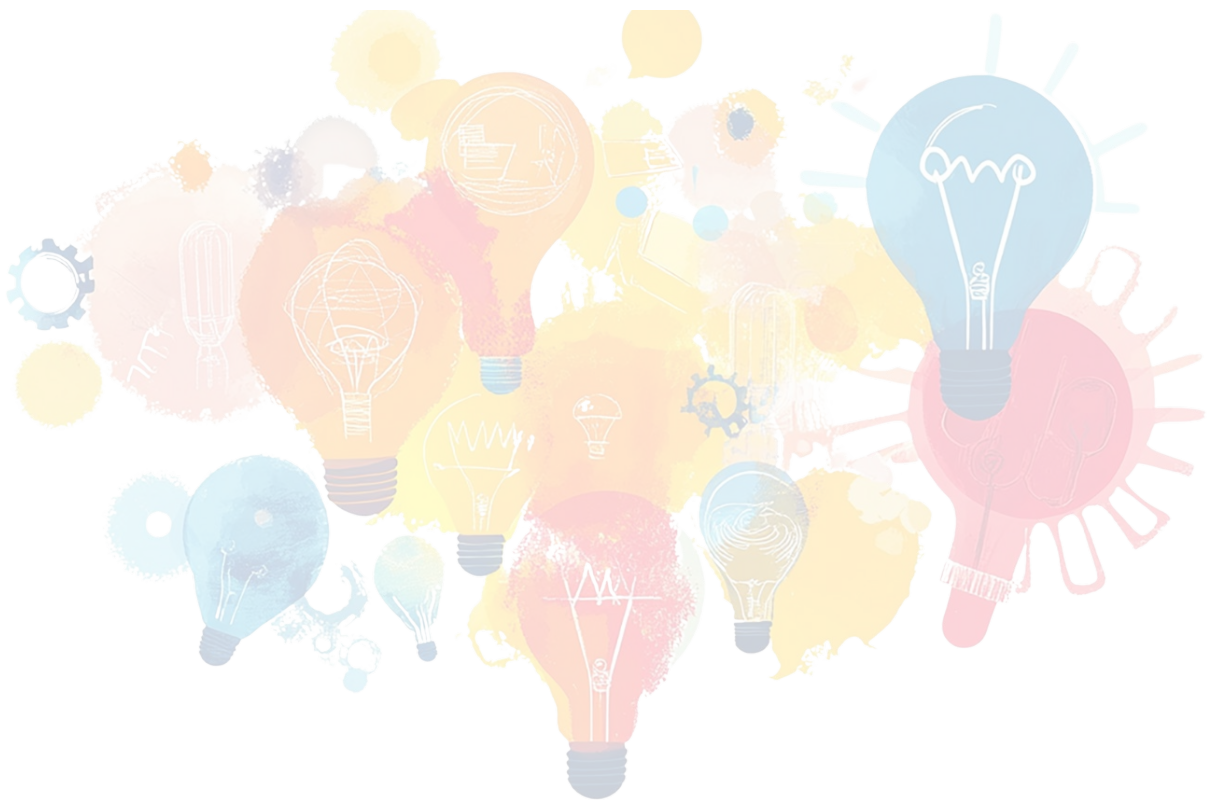
An umbrella EU equality strategy should be developed, to be accompanied by, or to form a common chapter within, a range of ground-specific equality strategies. This umbrella equality strategy should address the ambition and goals for all these equality strategies in achieving equality outcomes and eliminating discrimination across all grounds. It should drive the evolution and operation of an effective equality and non-discrimination infrastructure at Member State level. It should address overarching priorities across the grounds in particular in relation to new and emerging challenges, reasonable accommodation for diversity, and approaches to and initiatives on intersectionality.

An umbrella equality strategy should be developed with measures to ensure its effective implementation, monitoring and evaluation and in close cooperation with the ground specific equality strategies that accompany it. In this it should impose a requirement on Member States to develop and implement equality strategies for all grounds; secure a dual approach of mainstreaming and targeting; ensure independent and participative monitoring and evaluation of these equality strategies; and drive adequate equality data collection for this purpose.

There should be a focus on the challenge of policy implementation in these EU equality strategies, both an umbrella equality strategy and ground-specific strategies, ensuring an effective policy implementation chain from European to national to regional to local level. The allocation of necessary human and financial resources must be required at each level. There should be an emphasis in the EU equality strategies on collaboration, coordination and co-design of strategy, initiative development, and delivery mechanisms at national, regional and local levels, involving civil society organisations and engaging with equality bodies. The challenge of policy implementation and the risks of policy implementation failure should be a focus for attention, action, and learning at each of these levels.

The ground specific strategies to be developed and those to be renewed should be characterised by ambition, with particular attention to building on the gains made in the previous iterations of these ground-specific strategies. Consideration should be given to an effective response to the range of issues arising in the work of equality bodies and set out in section three above.

The range of ground specific strategies should be expanded to include a strategy on the age ground, and a socio-economic status ground, and to ensure a focus on national minorities and indigenous people by way of a new strategy or by way of their inclusion as a focus for action in existing strategies.



Equinet Member Equality Bodies

ALBANIA

Commissioner for the Protection from Discrimination
www.kmd.al

AUSTRIA

Austrian Disability Ombudsperson
www.behindertenanwalt.gv.at

AUSTRIA

Ombud for Equal Treatment
www.gleichbehandlungsanwaltschaft.gv.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

Ombudswoman of the Republic of Croatia
www.ombudsman.hr

CROATIA

Gender Equality Ombudsperson
www.prs.hr

CROATIA

Ombudsman for Persons with Disabilities
www.posi.hr

CYPRUS

Office of the Commissioner for Administration and the Protection of Human Rights
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 (Ombudsman) of Georgia
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
www.unar.it

KOSOVO*

Ombudsperson Institution
<https://oik-rks.org/>

LATVIA

Ombudsman's Office of the Republic of Latvia
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
ncpe.gov.mt

MOLDOVA

Equality Council
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 of the Republic of Poland
bip.brpo.gov.pl

PORTUGAL

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

PORTUGAL

Commission for Equality in Labour and Employment
cite.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.snsnp.sk

SLOVENIA

Advocate of the Principle of Equality
www.zagovornik.si

SPAIN

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

SPAIN

Institute of Women
www.inmujeres.gob.es

SWEDEN

Equality Ombudsman
www.do.se

UKRAINE

Ukrainian Parliament Commissioner for Human Rights
www.ombudsman.gov.ua

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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