



# General Assembly

Distr.: General  
23 August 2016

Original: English

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**Human Rights Council**  
**Working Group on the Universal Periodic Review**  
**Twenty-sixth session**  
31 October–11 November 2016

**Summary prepared by the Office of the United Nations High Commissioner for Human Rights in accordance with paragraph 15 (c) of the annex to Human Rights Council resolution 5/1 and paragraph 5 of the annex to Council resolution 16/21**

**Republic of Moldova\***

The present report is a summary of 38 stakeholders' submissions<sup>1</sup> to the universal periodic review. It follows the general guidelines adopted by the Human Rights Council in its decision 17/119. It does not contain any opinions, views or suggestions on the part of the Office of the United Nations High Commissioner for Human Rights (OHCHR), nor any judgement or determination in relation to specific claims. The information included herein has been systematically referenced in endnotes and, to the extent possible, the original texts have not been altered. As provided for in Human Rights Council resolution 16/21, where appropriate, a separate section is provided for contributions by the national human rights institution of the State under review that is accredited in full compliance with the Paris Principles. The full texts of all submissions received are available on the OHCHR website. The report has been prepared taking into consideration the periodicity of the review and developments during that period.

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\* The present document was not edited before being sent to United Nations translation services.



## **I. Information provided by stakeholders**

### **A. Background and framework**

#### **1. Scope of international obligations<sup>2</sup>**

1. Even though the Republic of Moldova had agreed during its first UPR to ratify or accede to the OP-ICESCR and OP-CRPD,<sup>3</sup> JS16 stated that it did not ratify any of these instruments.<sup>4</sup> JS14<sup>5</sup> and JS16<sup>6</sup> and the Office of the People's Advocate of the Republic of Moldova (the Ombudsperson's Office)<sup>7</sup> recommended that the Republic of Moldova ratify the OP-ICESCR. The Nondiscrimination Coalition (CND);<sup>8</sup> Ombudsperson's Office;<sup>9</sup> JS14<sup>10</sup> and JS16<sup>11</sup> recommended that the Republic of Moldova ratify the OP-CRPD.

2. The Council on the Prevention and Elimination of Discrimination and Ensuring Equality (CPEDEE),<sup>12</sup> Ombudsman's Office,<sup>13</sup> Council of Europe-Committee of Ministers (CoE-CM)<sup>14</sup>, JS1<sup>15</sup> and JS11<sup>16</sup> recommended that the Republic of Moldova ratify the Istanbul Convention.<sup>17</sup>

3. The Human Rights Information Centre (HRIC/CIDO),<sup>18</sup> ECRI,<sup>19</sup> JS14<sup>20</sup> and JS15<sup>21</sup> recommended that the Republic of Moldova ratify the European Charter of Regional or Minority Languages.

4. JS5 recommended that the Republic of Moldova ratify the Protocol No.12 to the Convention for the Protection of Human Rights and Fundamental Freedoms and adapt the Law on Discrimination accordingly.<sup>22</sup>

#### **2. Constitutional and legislative framework**

5. In line with the recommendations received by the Republic of Moldova in its first UPR,<sup>23</sup> the Legal Resources Centre from Moldova (LRCM) reported the adoption of the Law on Ensuring Equality (Law on Equality) in 2012.<sup>24</sup>

6. JS5 noted numerous shortcomings in the Law on Equality, such as the exclusion of four protected criteria, namely social origin, material situation, sexual orientation and health status.<sup>25</sup> The Law also provides several exceptions to discrimination<sup>26</sup> that represent a legal ground for limiting rights and access to equality for various groups of people.<sup>27</sup> GENDERDOC-M<sup>28</sup> and LRCM<sup>29</sup> made similar comments.

7. JS5 recommended that the Republic of Moldova amend the Law on Equality in order to widen the list of possible discrimination criteria<sup>30</sup> and exclude from Article 1(2) the discriminatory limitations.<sup>31</sup> GENDERDOC-M<sup>32</sup> and LRCM<sup>33</sup> made similar recommendations.

8. CPEDEE reported that a draft law criminalizing offenses and crimes motivated by prejudice, contempt or hatred had been drafted, but that it needed to be improved.<sup>34</sup> It recommended that the Republic of Moldova adopt the legal framework to ensure protection against all illegal actions based on hatred and prejudice.<sup>35</sup> GENDERDOC-M<sup>36</sup>, JS5<sup>37</sup> made similar recommendations. JS5 recommended amending the Criminal Code to include a provision for prosecuting bias-motivated attacks.<sup>38</sup>

9. The Office for Democratic Institutions and Human Rights of the Organisation for Security and Cooperation in Europe (OSCE/ODIHR) noted that the Ministry of Justice had set up an inter-institutional working group to revise and improve Criminal Code provisions addressing hate crimes.<sup>39</sup>

10. JS5 recommended that the Republic of Moldova adopt a proactive approach to prevention of hate speech among public officials; bring to accountability public officials and institutionalize the hate speech as a separate criminal offence.<sup>40</sup> GENDERDOC-M made a similar recommendation.<sup>41</sup>

11. JS1 noted that since 2013, the State has been working on amendments to harmonize the national legislation with the provisions of the Istanbul Convention.<sup>42</sup> OSCE/ODIHR highlighted that the main challenge remained the implementation of the legislation and the investigation and prosecution of domestic violence cases.<sup>43</sup>

12. JS1 recommended that the Republic of Moldova initiate amendments to the Law on Prevention and Fight against Domestic Violence and the Criminal Code to increase penalties and draft an action plan on domestic violence.<sup>44</sup>

13. While welcoming the measures taken to advance the rights of persons with disabilities such as the adoption of Law No. 60 on the Social Inclusion of Persons with Disabilities in 2012,<sup>45</sup> CND noted the lack of implementation mechanisms.<sup>46</sup> It also reported that Law No. 87, which strengthens the rights of disabled people, had returned to Parliament for revision.<sup>47</sup> JS18<sup>48</sup> and JS3<sup>49</sup> made similar comments.

14. JS16 recommended that the Republic of Moldova amend the Constitution to introduce an explicit prohibition of discrimination on grounds of disability;<sup>50</sup> expedite the process of adoption of Law No. 87 and abolish the Civil Code provisions on discriminatory deprivation of legal capacity on grounds of disability.<sup>51</sup> CND,<sup>52</sup> CPEDEE,<sup>53</sup> and JS18<sup>54</sup> made similar recommendations.<sup>55</sup>

### 3. Institutional and human rights infrastructure and policy measures

15. The Ombudsperson's Office stated that Law No. 52 on People's Advocate did not provide adequately for reform of the institution and strengthening its capacities. It added that legal complications undermined the independence of the Ombudsperson and the financial resources of his Office.<sup>56</sup>

16. The Ombudsperson's Office recommended that the Republic of Moldova provide it with suitable facilities and properly fund its activities.<sup>57</sup>

17. While noting that the new legal framework for the operation of the People's Advocate was, overall, in line with the Paris Principles, The Venice Commission<sup>58</sup> recommended that the Republic of Moldova guarantee a stronger independence to the People's Advocate and a clearer definition of the position of the Ombudsperson for the rights of the Child.<sup>59</sup>

18. JS5 indicated that an autonomous state body, the Council for Preventing and Eliminating Discrimination and Ensuring Equality (CPEDEE), responsible for the implementation of the Law on Equality, had been established in 2013.<sup>60</sup>

19. CPEDEE noted that its mandate included examination of discrimination complaints, assessment of legislation from the equality perspective and promotion of equal opportunities.<sup>61</sup> It added that it was competent only to find offences with discriminatory elements, the application of sanctions being the prerogative of the courts.<sup>62</sup> GENDERDOC-M,<sup>63</sup> LRCM<sup>64</sup> and JS5<sup>65</sup> made similar comments.

20. CPEDEE recommended that the Republic of Moldova amend the legislation to empower it with investigation and sanctioning powers<sup>66</sup> and ensure its funding.<sup>67</sup> GENDERDOC-M,<sup>68</sup> LRCM,<sup>69</sup> JS5<sup>70</sup> and JS11<sup>71</sup> made similar recommendations.

21. JS5 stated that the CPEDEE fulfilled its functions selectively in application of recommendations and submission of cases to court and that it had not submitted any draft law to amend the national legal framework.<sup>72</sup> JS5 also noted that the time limit of three

months granted to the CPEDEE to examine complaints was not enough.<sup>73</sup> It recommended that the Republic of Moldova extend the special period of prescription for discrimination offences from 3 to 12 months.<sup>74</sup>

22. JS6 stated that the National Preventive Mechanism had not functioned effectively since 2013 and that the adoption of the new Law on the Ombudsman had not solved this.<sup>75</sup> It recommended that the Republic of Moldova approve the Regulations of the Council for the Prevention of Torture.<sup>76</sup>

23. The Commissioner for Human Rights of the Council of Europe (the Commissioner) reported that civil society representatives pointed out deficiencies in the implementation of the National Human Rights Action Plan (NHRAP), including insufficient funding, poor implementation and lack of consultation.<sup>77</sup> The Commissioner noted that following the Republic of Moldova's UPR, a revised edition of the NHRAP had been made.<sup>78</sup>

24. The Commissioner recommended that the implementation of action plans be reviewed regularly.<sup>79</sup>

25. JS5 recommended that the Republic of Moldova adopt and implement its next NHRAP in 2016, taking into account specific measures supporting and protecting the work of Human Rights Defenders (HRDs) and ensure the consultation of NGOs in the process.<sup>80</sup>

26. Noting that the adoption of the National Strategy on Child Protection for 2014-2020 had been a positive development, Lumos was concerned that the action plan had not yet been approved<sup>81</sup> and recommended that the Republic of Moldova approve and implement it.<sup>82</sup>

27. JS11 noted that the institutional framework for gender equality remained ineffective<sup>83</sup> and recommended that the Republic of Moldova allocate funds for equality focal points in key ministries.<sup>84</sup>

28. Stating that the Roma Inclusion Action Plan 2011-2015 had been poorly implemented, due to a lack of appropriate budget allocation,<sup>85</sup> JS9 recommended that the Republic of Moldova fund it adequately.<sup>86</sup> CPEDEE<sup>87</sup> and HRIC/CIDO<sup>88</sup> made a similar recommendation.

## **B. Cooperation with human rights mechanisms**

29. CND recommended that the Republic of Moldova implement the relevant recommendations from the previous UPR cycle on, among others, employment, stigmatization, segregation and education.<sup>89</sup>

### **1. Cooperation with treaty bodies**

N/A

### **2. Cooperation with special procedures**

30. JS12 recommended that the Republic of Moldova invite the Working Group on Arbitrary Detention and the Special Rapporteur on torture and other cruel, inhuman or degrading treatment or punishment for an assessment in Transnistria.<sup>90</sup>

31. JS17 recommended that the Republic of Moldova invite the Special Rapporteurs on the promotion and protection of the right to freedom of opinion and expression, and on human rights defenders to make an assessment in the Transnistrian region of Moldova.<sup>91</sup>

### 3. Cooperation with the Office of the United Nations High Commissioner for Human Rights

N/A

## C. Implementation of international human rights obligations, taking into account applicable international humanitarian law

### 1. Equality and non-discrimination

32. The Community of Originals from Afro-Asian Countries in the Republic of Moldova (COTAARM) reported that people of African Descent were one of the less tolerated groups in the country.<sup>92</sup> It stated that police officers, prosecutors and judges were reluctant to register and qualify cases against Afro-Asian as hate crimes.<sup>93</sup>

33. COTAARM recommended that the Republic of Moldova create efficient mechanisms to investigate and punish hate crimes, racial harassment and racial discrimination.<sup>94</sup>

34. GENDERDOC-M stated that bias-motivated discourse; hate speech and incitement to discrimination against LGBT people by public figures persisted.<sup>95</sup> It added that the prosecutor's office was reluctant to investigate bias-motivated crimes and speeches based on sexual orientation and gender identity.<sup>96</sup>

35. GENDERDOC-M recommended that the Republic of Moldova ensure effective investigation of bias-motivated crimes and hate speech against LGBT people and activists<sup>97</sup> and carry out training for police officers and prosecutors on investigation of these crimes.<sup>98</sup> JS5 recommended extending the list of grounds for hate speech.<sup>99</sup>

36. Stating that the education system is contributing to the perpetuation of gender discrimination,<sup>100</sup> JS4 recommended that the Republic of Moldova integrate equality and non-discrimination, as a compulsory part of the school curricula.<sup>101</sup>

37. Noting that direct discrimination on ethno-linguistic grounds persisted, HRIC/CIDO recommended that the Republic of Moldova put in place training programmes for officials on non-discrimination.<sup>102</sup>

38. JS10 noted that several religious hate crime cases were reported<sup>103</sup> and that religious and political leaders employed Islamophobic discourses and those instigating discrimination.<sup>104</sup> It recommended that the Republic of Moldova create mechanisms for the investigation and punishing of hate crimes and speech based on religious grounds.<sup>105</sup>

39. HRIC/CIDO stated that as the identity and documentation system operated on the basis of Romanian language, the ethno-linguistic minorities using culturally-appropriate personal names could not have them expressed in appropriate form.<sup>106</sup> JS14 made similar comments.<sup>107</sup> HRIC/CIDO recommended that the Republic of Moldova ensure freedom in choice of names and transcription, including in non-Romanian scripts.<sup>108</sup> JS14 made a similar recommendation.<sup>109</sup>

### 2. Right to life, liberty and security of the person

40. In 2013, the Commissioner reported that impunity for ill-treatment by law enforcement officials remained a serious problem.<sup>110</sup> The authorities are urged to raise awareness among judges and prosecutors of their duty to investigate all allegations of ill-treatment by law enforcement officials.<sup>111</sup> JS19 made a similar recommendation.<sup>112</sup>

41. JS19 stated that most cases of ill-treatment were attributed to the police during arrest and the preliminary investigation period.<sup>113</sup> In addition to forcing confessions, physical

abuse was reportedly used also as a method of intimidation.<sup>114</sup> It added that the culture of impunity was one of key factors contributing to the prevalence of torture and ill-treatment.<sup>115</sup>

42. JS19 recommended that the Republic of Moldova amend the legislation to establish clear conditions for the use of force<sup>116</sup> and establish a system to monitor the treatment of persons arrested, detained or imprisoned.<sup>117</sup> JS6 made similar recommendations.<sup>118</sup>

43. JS16 noted that persons living in residential institutions were exposed to threats of mistreatment, neglect, restraint, forced medication and seclusion, as well as many forms of abuse and violence, including of gender-based nature.<sup>119</sup> JS6,<sup>120</sup> JS15<sup>121</sup> and JS18<sup>122</sup> made similar comments. JS18 stated that the Government had taken insufficient measures to prevent or detect abuses, investigate them and punish perpetrators.<sup>123</sup>

44. JS6 recommended that the Republic of Moldova apply measures to prevent cases of ill-treatment in psychiatric facilities.<sup>124</sup> JS16 recommended investigating all allegations of ill-treatment against persons with disabilities and bringing perpetrators to justice.<sup>125</sup> JS15<sup>126</sup> and JS18<sup>127</sup> made similar recommendations.

45. Stating that there were still cases of pressure and attacks against LGBT organisations and HRDs,<sup>128</sup> JS5 recommended to pay particular attention to these cases<sup>129</sup> and investigate them as well as ensure that HRDs are able to exercise their rights without obstruction, in Transnistrian region too.<sup>130</sup>

46. The Ombudsperson's Office stated that detention conditions had not improved significantly. Overpopulation, hygiene conditions, poor quality and insufficient quantity of food and lack of proper healthcare are the main problems.<sup>131</sup> J19 made similar comments.<sup>132</sup>

47. JS19 recommended that the Republic of Moldova improve the conditions of detention in police stations and prisons<sup>133</sup> and the Ombudsperson's Office recommended speeding up the construction and renovation of detention facilities.<sup>134</sup>

48. Recalling that during the first UPR, the majority of recommendations related to violence against women,<sup>135</sup> JS1 welcomed the steps taken to combat gender-based violence.<sup>136</sup> However, the Ombudsperson's Office noted an increased number of domestic violence cases and the inefficient intervention by the authorities responsible for the protection of victims.<sup>137</sup> CPEDEE,<sup>138</sup> JS1<sup>139</sup> and JS11<sup>140</sup> made similar comments.<sup>141</sup>

49. CPEDEE recommended to strengthen efforts to prevent, investigate and punish all forms of violence against women.<sup>142</sup> The Ombudsperson's Office recommended improving current regulations and financing the assistance of victims of domestic violence.<sup>143</sup> JS1 made similar recommendations.<sup>144</sup>

50. JS1 indicated that safe housing and services for victims of domestic violence were lacking and continued to be provided by NGOs<sup>145</sup> and recommended that the Republic of Moldova expand rehabilitation centres.<sup>146</sup>

51. The Ombudsperson's Office reported the development of policies for preventing and combating child labour and recommended the implementation of the existing mechanisms for monitoring employment and sanctioning employers who violate the law.<sup>147</sup>

52. The Ombudsperson's Office noted that sanctions had been tightened for child trafficking; that beneficiaries of services of human trafficking victims had been criminalised, so had the trafficking of organs.<sup>148</sup>

53. While welcoming the establishment of the National Committee for Combating Trafficking in Human Beings, GRETA<sup>149</sup> urged the Moldovan authorities to implement further measures to identify victims and potential victims of trafficking; to assist such victims and to improve the investigation of trafficking cases.<sup>150</sup>

### 3. Administration of justice, including impunity, and the rule of law

54. Recalling that in 2011, the Republic of Moldova had received recommendations on the fight against corruption and the reform of judiciary,<sup>151</sup> LRCM noted that the 2011-2016 Justice Reform Strategy (JSRS) established core activities to reorganise the judicial map and reform the prosecution service<sup>152</sup> as well as the selection and promotion of judges.<sup>153</sup> LRCM recommended that the Republic of Moldova continue the implementation of the JSRS and the activities provided by the strategy.<sup>154</sup>

55. Noting the lack of the quality of legal aid services funded by the State,<sup>155</sup> JS15 recommended that the Republic of Moldova improve these services<sup>156</sup> and amend the legislation to provide the possibility to file civil complaints in other language than the state language.<sup>157</sup>

56. JS8 stated that the practice of depriving persons with disabilities of legal capacity and placing them under full guardianship was still widely used.<sup>158</sup> CPEDEE,<sup>159</sup> JS18<sup>160</sup> and JS16<sup>161</sup> made similar comments.

57. Stating that people denied of their legal capacity were at risk of abuse due to the lack of an effective complaint mechanism,<sup>162</sup> JS15 recommended that the Republic of Moldova amend procedural legislation in order to grant access to justice to these persons.<sup>163</sup>

58. The Ombudsperson's Office stated that progress had been made in strengthening juvenile justice; however, there was no legal and institutional framework for sanctioning and re-educating minors who committed a crime but may not be held criminally accountable.<sup>164</sup> The Ombudsperson's Office recommended that the Republic of Moldova establish an institutional and legal framework for children who committed crimes but had not reached the age of criminal liability and strengthen the role of authorities in re-socializing minors.<sup>165</sup>

59. The Ombudsperson's noted the lack of progress in strengthening anti-corruption measures<sup>166</sup> and JS6 stated that the approval of the set of anticorruption laws in 2013 had not produced the expected results.<sup>167</sup>

60. LRCM stated that the mandates of the several anticorruption institutions were too broad; their competencies were overlapping their independence was questionable.<sup>168</sup> LRCM recommended that the Republic of Moldova prioritize the fight against high-level corruption; review the legislation on corruption related offences and ensure that dissuasive sanctions are provided.<sup>169</sup>

### 4. Freedom of religion or belief, expression, association and peaceful assembly, and right to participate in public and political life

61. JS3 noted that the Moldovan Orthodox Church's interference in public affairs violated the principle of secularism and discriminated against other religious cults.<sup>170</sup> JS15 made similar comments.<sup>171</sup>

62. CPEDEE recommended that the Republic of Moldova adjust the legislation to ensure the observance of freedom of conscience, thought and religion for everyone.<sup>172</sup> JS4 recommended enhancing the secular character of state education,<sup>173</sup> and incorporating human rights<sup>174</sup> and diversity education in the schools curricula.<sup>175</sup> JS1,<sup>176</sup> JS3,<sup>177</sup> JS15<sup>178</sup> and CPEDEE<sup>179</sup> made similar recommendations.

63. Stating that numerous cases of religious minorities attempting to register themselves as a recognized organization had been unduly delayed,<sup>180</sup> JS3 recommended that the Republic of Moldova ensure a fair registration process for cults.<sup>181</sup>

64. Concluding that the case against Oleg Savenkov and Mihail Calestru, two members of the Unification Church in Moldova arrested in 2015 is legally baseless,<sup>182</sup> JS13 recommended that the Republic of Moldova release them.<sup>183</sup>
65. Freedom House (FH) stated that access to information; media's independence and pluralism remained critical and that compliance with laws regulating media remained weak.<sup>184</sup> JS8 made similar comments.<sup>185</sup> JS8 recommended compliance with the principle of maximum access to information including in the autonomous region Gagauzia.<sup>186</sup>
66. FH reported that in 2013, the Criminal Code had been amended and established fines for intimidation by criticism; obstruction of journalists' and media outlets' work.<sup>187</sup>
67. FH noted that the outdated Law on the Press remained in place<sup>188</sup> and that the reform of the Broadcasting Code had stalled.<sup>189</sup> It recommended that the Republic of Moldova repeal the Law on Press and adopt a comprehensive national legislation to limit media ownership concentration, ensure media pluralism, and protect independent media.<sup>190</sup> JS8 made similar recommendations.<sup>191</sup>
68. HRIC/CIDO recommended that the Republic of Moldova ensure timeshare of broadcasting in minority languages.<sup>192</sup> JS14 made a similar recommendation.<sup>193</sup>
69. JS18 recommended that the Republic of Moldova ensure exercise of the right to freedom of expression in Gagauzia.<sup>194</sup>
70. Noting that some participants in peaceful demonstrations expressing critical opinions had been discouraged by coercive measures from judicial institutions,<sup>195</sup> JS9 recommended that the Republic of Moldova refrain from intimidation of peaceful events.<sup>196</sup>
71. HRIC/CIDO mentioned reports about denial in registration of NGOs which chose a legal name in a language other than Romanian or Russian<sup>197</sup> and recommended to amend the legislation, including in Gagauzian, to enable registration of association names in minority languages of Moldova.<sup>198</sup>
72. JS4 recommended that the Republic of Moldova ensure the effective decentralization of the services of registration<sup>199</sup> and register public association using foreign languages words in their names.<sup>200</sup>
73. Noting that the right to be elected had been limited for independent candidates,<sup>201</sup> Promo-Lex recommended that Parliament amend the Electoral Code in order to ensure equal chances for independent candidates and political parties during the registration process.<sup>202</sup>
74. Promo-Lex indicated that women continued to be underrepresented in the decision making bodies, including Parliament.<sup>203</sup> CPEDEE,<sup>204</sup> OSCE/ODIHR,<sup>205</sup> JS3<sup>206</sup> and JS11<sup>207</sup> made similar comments. JS11 recommended the vote of a minimum gender representation quota.<sup>208</sup>
75. The Ombudsperson's Office reported that Roma women, women with disabilities, and other vulnerable groups were frequently excluded from public life.<sup>209</sup>
76. JS2 recommended that the Republic of Moldova develop educational and awareness-raising programs on the right of youth to vote and encourage civic education in schools.<sup>210</sup>

## 5. Right to work and to just and favourable conditions of work

77. JS2 noted that the unemployment rate was higher among young people than adults<sup>211</sup> and recommended that the Republic of Moldova facilitate work opportunities for young people.<sup>212</sup>



78. Stating that there were worrying trends regarding gender equality in the labour market,<sup>213</sup> JS11 recommended that the Republic of Moldova implement measures to eliminate discrimination against women in employment.<sup>214</sup>

79. HH stated that people with intellectual and psychosocial disabilities remained stigmatized by society, resulting in a high rate of unemployment and isolation.<sup>215</sup> ProAbility recommended that the Republic of Moldova implement tools to encourage the employment of people with disabilities.<sup>216</sup> JS16 made a similar recommendation.<sup>217</sup>

## 6. Right to social security and to an adequate standard of living

80. HH stated that vulnerable groups, including disabled people, often faced social exclusion, poverty and lack of access to public services.<sup>218</sup>

81. Stating that the existing pension system was unfair and unsustainable,<sup>219</sup> the Ombudsperson's Office recommended that the Republic of Moldova adjust social benefits and national minimum wage to the minimum subsistence level.<sup>220</sup>

82. The Ombudsperson's Office noted that the residential childcare system reform was encumbered by insufficient alternative services to the residential institutions; insufficient funding for social services and inadequate allowances for orphans.<sup>221</sup>

## 7. Right to health

83. JS4 indicated that despite the fact that primary and emergency medical care should be free of charge, the patients had to pay for medical care, due to low wages for personnel and corruption.<sup>222</sup> It added that the medical institutions were not well equipped for giving quality health care.<sup>223</sup> The Ombudsperson's Office made similar comments.<sup>224</sup> JS4 recommended that the Republic of Moldova ensure the continuous monitoring of the quality of medical services provided<sup>225</sup> and create an independent malpractice investigation body.<sup>226</sup>

84. Positive Initiative noted that there were about 300,000 people living with Hepatitis and that every year, 3,000 of them died due to the lack of accessible treatment.<sup>227</sup> It urged the Republic of Moldova to implement measures to lower prices for Hepatitis C medicines and increase the number of beneficiaries of the National Programme for the treatment of Hepatitis C.<sup>228</sup>

85. Lumos indicated that even though infant mortality rates had reduced, these rates remained high compared to the European average.<sup>229</sup> It added that while the number of children in institutions was decreasing, the proportion of institutionalised children under 3 remained steady.<sup>230</sup> It recommended that the Republic of Moldova ensure access to quality medical and social services<sup>231</sup> and develop family support services for young at-risk children.<sup>232</sup>

86. Reporting the lack of universal access to insulin, syringes,<sup>233</sup> and adequate diabetes emergency services;<sup>234</sup> the Association of Young People with Diabetes of Moldova recommended that the Republic of Moldova draft and approve the 2016-2020 National Diabetes Program.<sup>235</sup>

87. Indicating that the frequency of teenage pregnancy still remained relatively high, especially in rural areas,<sup>236</sup> JS4 recommended that the Republic of Moldova introduce as a mandatory subject the sexual education course.<sup>237</sup>

88. ADF International recommended that the Republic of Moldova introduce additional safeguards on abortion services and review the sexuality education to ensure that it is age-appropriate and does not violate parents' wishes.<sup>238</sup>

## 8. Right to education

89. JS14 noted that the Republic of Moldova had not organised education in the native language for the national minorities.<sup>239</sup> HRIC/CIDO made similar comments<sup>240</sup> and recommended that the Republic of Moldova launch programmes of studies entirely or predominantly in Ukrainian, Gagauz, Bulgarian and Romani languages.<sup>241</sup> JS14 made similar recommendations.<sup>242</sup>

90. HRIC/CIDO reported that in the majority of Moldova's school manuals ethnic minorities were generally mentioned occasionally and often in a marginalizing context.<sup>243</sup> It recommended that the Ministry of Education perform a human rights and anti-discrimination analysis of its educational policies and reform them according to the analysis' recommendations.<sup>244</sup>

91. JS9 reported that in 2013, only half of Roma children had attended primary and secondary education<sup>245</sup> and explained that lack of financial capability to support children's education, discriminatory school environment and early marriages were among the reasons of school non-attendance and dropouts.<sup>246</sup> JS10 made similar comments.<sup>247</sup> JS3 recommended that the Republic of Moldova implement measures to promote Roma's access to higher education<sup>248</sup> and JS10 recommend combatting the absenteeism and school drop outs among Roma children, especially among girls.<sup>249</sup>

92. Stating that people with disabilities were discriminated in their right to education,<sup>250</sup> JS16 recommended that the Republic of Moldova eliminate all barriers preventing access of children with disabilities to the education system.<sup>251</sup> Lumos recommended that the Republic of Moldova ensure access to inclusive education for children and young people.<sup>252</sup>

## 9. Persons with disabilities

93. Recalling that during its first UPR, the Republic of Moldova had received several recommendations regarding persons with disabilities,<sup>253</sup> HH reported that there were approximately 183,700 persons with disabilities<sup>254</sup> registered<sup>255</sup> and that up to 20 percent of adults with disabilities were placed in residential institutions.<sup>256</sup>

94. Indicating that between 2010 and 2015, the State had taken measures to de-institutionalize people with disabilities, HH stated that without alternatives to the old institutions, former patients may end up homeless.<sup>257</sup> CND noted that no plan regarding the closing of "neuropsychological institutions" and their replacement with alternative community services had been developed.<sup>258</sup> JS10 made similar comments.<sup>259</sup>

95. Lumos recommended that the Republic of Moldova continue the overall de-institutionalisation process of persons with disabilities,<sup>260</sup> and take measures to ensure monitoring of disability institutions to end and prevent abuse.<sup>261</sup> CND recommended establishing a moratorium on institutionalization of people with disabilities in "neuropsychological institutions".<sup>262</sup> JS16 recommended ensuring the access to community based support for persons with disabilities.<sup>263</sup> JS18 made similar recommendations.<sup>264</sup>

96. JS10 recommended that the Republic of Moldova integrate mechanisms for social integration needs of people with psychosocial disabilities.<sup>265</sup> HH made similar recommendations.<sup>266</sup>

97. Stating that the legislation did not insure the compensatory technical means for people with visual and auditory disabilities,<sup>267</sup> Low Vision recommended that the Republic of Moldova provide specialized rehabilitation equipment for this category of people.<sup>268</sup>

98. CND noted a severe lack of accessibility of the physical environment and transportation for persons with disabilities.<sup>269</sup> CPEDEE,<sup>270</sup> Stoics,<sup>271</sup> JS3<sup>272</sup> and JS16<sup>273</sup> made similar comments. It recommended that the Republic of Moldova adopt an action

plan on renovation of old buildings and public spaces to ensure the accessibility for the persons with disabilities.<sup>274</sup> CND<sup>275</sup>, CPEDEE,<sup>276</sup> JS3<sup>277</sup> and JS16<sup>278</sup> recommended sanctioning the lack of compliance with the accessibility requirements.

## 10. Minorities

99. HRIC/CIDO reported that from 25 to 35 percent of Moldovan citizens belong to ethnic minorities and about 15 percent were people whose first language was Ukrainian, Gagauz, Bulgarian, and Romani.<sup>279</sup>

100. JS3 stated that Roma faced social discrimination;<sup>280</sup> CPEDEE was concerned at the persistence of stereotypes of the majority of the population towards Roma<sup>281</sup> and JS9 reported the increasing phenomenon of anti-gypsyism.<sup>282</sup> JS10 recommend that the Republic of Moldova conduct information campaigns aimed at eliminating stereotypes concerning Roma people<sup>283</sup> and JS9 recommend combatting anti-gypsyism in the media.<sup>284</sup>

101. JS10 recalled the recommendations<sup>285</sup> regarding Roma made during the first UPR of the Republic of Moldova<sup>286</sup> and indicated that Roma people remained in position of inequality in the labour market and had difficulties to cover their needs.<sup>287</sup> JS3 made similar comments.<sup>288</sup> JS9 noted that Roma were largely absent from local and national political life.<sup>289</sup>

102. JS10 stated that 45 percent of Roma women did not attend school.<sup>290</sup> JS9 noted that even though for the first time in 2015, two Roma women had been elected as local councillors, the rate of Roma women participation in public life still remained very low.<sup>291</sup> JS3<sup>292</sup> made similar comments.

103. JS10 recommended that the Republic of Moldova solve the socio-economic problems of Roma people such as housing conditions, unemployment, access to healthcare, and access to education.<sup>293</sup> JS3<sup>294</sup> and JS9<sup>295</sup> made similar recommendations. JS9 also recommended ensuring equal participation of Roma women in education, employment and public life.<sup>296</sup>

## 11. Migrants, refugees and asylum seekers

104. COTAARM reported about the violation of the right of free movement for refugees,<sup>297</sup> who could not go abroad for study or professional purposes; cannot work; participate in grant competitions and run their own business.<sup>298</sup> It recommended that the Republic of Moldova provide every refugee with travel documents.<sup>299</sup>

## 12. Situation in, or in relation to, specific regions or territories

105. JS12 stated that during the last 25 years, very little was known about and done to defend human rights in the territories controlled by *de facto* administrations.<sup>300</sup>

106. JS17 emphasizes that three of the UPR recommendations accepted by the Republic of Moldova<sup>301</sup> referred to the Transnistrian region.<sup>302</sup> JS12 noted that the Moldovan authorities did not pass any regulation specific to the situation in Transnistria to protect the victims of human rights violations.<sup>303</sup>

107. The Ombudsperson's Office reported that in 2012, it had opened a representative office in the Varnita village to monitor the observance of human rights in the Transnistrian region and support the NGOs.<sup>304</sup>

108. The Ombudsperson's Office stated that although some objectives for promoting and securing human rights in the Transnistrian region had been included in the 2011-2014 NHRAP, many of them had not been achieved.<sup>305</sup>

109. JS12 recommended that the Republic of Moldova assess the NHRAP's implementation in Transnistria and present this information to the public.<sup>306</sup> The Ombudsperson's Office recommended including the promotion and protection of human rights in the negotiations agenda.<sup>307</sup> JS7 made a similar recommendation.<sup>308</sup>

110. JS12 denounced in Transnistria, the violations of the rights to freedom of movement, to an adequate standard of living, to health and education as well as to freedom of expression and association.<sup>309</sup> It also noted numerous cases of arbitrary detention, abductions<sup>310</sup> and acts of torture<sup>311</sup> by the local police and in military units.<sup>312</sup> It added that critical detention conditions had been reported.<sup>313</sup>

111. JS8 recommended that the Republic of Moldova take concrete steps to ensure exercise of freedom to expression in Transnistria and provide protection to those who are subjected to persecution for expressing their opinions.<sup>314</sup>

112. JS17 stated that the local anti-extremist decree had a negative impact on the activity of NGOs from Transnistria and discouraged the activities of civil society in the region.<sup>315</sup>

113. JS12 noted that in 2011-2015, the *de facto* administration of Transnistria had continued to limit the access of different categories of people into the region, including HRDs, representatives of NGOs and journalists.<sup>316</sup>

114. JS5 noted that the pressure put on HRDs by the *de facto* administration in Tiraspol had increased and that numerous representatives of NGOs were intimidated and subjected to libel accusations for their work.<sup>317</sup> JS17 made similar comments.<sup>318</sup>

115. JS17 reported that civil society organisations regretted that the UPR recommendation regarding the support of NGOs in the Transnistrian region had not been implemented by the Moldovan Government.<sup>319</sup> The Ombudsperson's Office recommended that the Republic of Moldova actively support civil society efforts in promoting human rights in the Transnistrian region.<sup>320</sup> JS17 made a similar recommendation.<sup>321</sup>

116. JS17 recommended that the Republic of Moldova call upon international actors and the participants of the Transnistrian conflict settlement to focus on the challenges faced by human rights organizations harassed by the Transnistrian authorities<sup>322</sup> and ensure that investigations on cases of reprisals against HRDs, activists, and journalists are carried out and responsible are brought to justice.<sup>323</sup>

## Notes

- <sup>1</sup> The stakeholders listed below have contributed information for this summary; the full texts of all original submissions are available at: [www.ohchr.org](http://www.ohchr.org).

*Civil society*

## Individual submissions:

ADF International HRIC/CIDO	Alliance Defending Freedom, Geneva (Switzerland); Human Rights Information Centre, Chisinau (Republic of Moldova);
CMSR	Centre for Medical and Social Rehabilitation for People with Low Vision, Chisinau (Republic of Moldova);
COTAARM	Community of Originals from Afro-Asian Countries in the Republic of Moldova, Chisinau (Republic of Moldova);
DIA	Association of Young People with Diabetes of Moldova, Chisinau (Republic of Moldova);
FH	Freedom House, Washington (USA);
GENDERDOC-M	Genderdoc-M Information Center, Chisinau (Republic of Moldova);
HH	Hope and Health, Chisinau (Republic of Moldova);
IP	Initiativa Pozitiva, Chisinau (Republic of Moldova);
LRCM	Legal Resources Centre from Moldova, Chisinau (Republic of Moldova);
Lumos	Lumos, Protecting Children, Providing Solutions, London (UK);
CND	Nondiscrimination Coalition, Chisinau (Republic of Moldova);
ProAbility	ProAbility, Chisinau (Republic of Moldova);
Promo-Lex	Promo-Lex Association, Chisinau (Republic of Moldova);
Stoics	Youth Association Stoics, Balti (Republic of Moldova).

## Joint submissions:

JS1	Joint submission 1 submitted by: Women's Law Center, International Center for Women's Rights Protection and Promotion "La Strada"; Promo-Lex; Advocates for Human Rights and National Coalition "Life without violence"; Minneapolis (USA);
JS2	Joint submission 2 submitted by: National Youth Council of Moldova (CNTM); Chisinau (Republic of Moldova);
JS3	Joint submission 3 submitted by: Human Rights Information Center and Clinique internationale de Défense des Droits de l'Homme (UQAM); Chisinau (Republic of Moldova);
JS4	Joint submission 4 submitted by: Human Rights Information Center and HomoDiversus; Chisinau (Republic of Moldova);
JS5	Joint submission 5 submitted by: Coalition of NGOs for UPR Moldova: Civil Rights Defenders; Nondiscrimination Coalition/CND; Genderdoc-M Information Centre (GDM); Independent Journalism Centre (IJC); Lawyers for Human Rights; Human Rights Information Center (CIDO); HomoDiversus and Information and Legal Center "Apriori"; Chisinau (Republic of Moldova);
JS6	Joint submission 6 submitted by: Coalition of NGOs for UPR Moldova: Civil Rights Defenders, Genderdoc-M Information Centre (GDM); Moldovan Institute for Human Rights (IDOM); Lawyers for Human Rights and Centre for Analysis and Prevention of Corruption (CAPC); Chisinau (Republic of Moldova);
JS7	Joint submission 7 submitted by: Coalition Coparticipare
JS8	Joint submission 8 submitted by: Coalition of NGOs for UPR Moldova: Civil Rights Defenders; Lawyers for Human Rights,

- Independent Journalism Center (ICJC); Information and Legal Center “Apriori” and Association of Independent Press (API), Chisinau (Republic of Moldova);
- JS9 Joint submission 9 submitted by: Resource Center for Human Rights (CREDO) and Roma National Center (CNR); Chisinau (Republic of Moldova);
- JS10 Joint submission 10 submitted by: Association for the Support of Persons with Intellectual Disabilities (DOR); Association for the Promotion and Protection of the Rights of Persons with Psychosocial Disabilities; Union of Young Roma People of Republic of Moldova “Tarna Rom”; Roma Women Network; Union of Pentecostal Churches; Islamic League and “Falun Dafa” Associations of Republic of Moldova; Chisinau (Republic of Moldova);
- JS11 Joint submission 11 submitted by: Gender Equality Platform; National Coalition, “Life without Violence” and Centre for Entrepreneurial Education and Business Support, Chisinau (Republic of Moldova);
- JS12 Joint submission 12 submitted by: Promo-Lex and International Federation for Human Rights (FIDH); Chisinau (Republic of Moldova);
- JS13 Joint submission 13 submitted by: Human Rights Without Frontiers (HRWF) and Forum for Religious Freedom-Europe (FOREF); Brussels (Belgium);
- JS14 Joint submission 14 submitted by: Association of Mothers with Many Children and Women Entrepreneurs of Gagauzia “Vesta”; Alliance of Women in Southern Moldov and European Center of Civic Initiatives “Stalker”; Comrat (Republic of Moldova);
- JS15 Joint submission 15 submitted by: Human Rights Resource Group; Chisinau (Republic of Moldova);
- JS16 Joint submission 16 submitted by: Speranța Centre; Woman and Child- Protection and Support; Alliance of Organizations for Persons with Disabilities from Republic of Moldova; Dezdna; Motivatie; Prima; Promotorii Noului; Association for Support of Persons with Mental Disabilities Dor; Association of Support of Children and Young People with Disabilities Dorința; Association of Support of Children with Special Needs; Association of Support for Children with Physical Disabilities from Peresecina; Association of the Deaf of the Republic of Moldova; Association of the Non-governmental Organization for Children with Disabilities „Steaua Calauza; Association of the People with Disabilities of the Republic of Moldova; Centre of Early Intervention Voinicel; Centre of Legal Assistance for People with Disabilities; Keystone Human Services International Moldova Association; Moldova Association for Deaf Children (MADC); Moldova Association of the Blind; Moldovan Institute for Human Rights; Hope and Health; Federation of Torball and Goallball of the Republic of Moldova; Eco-Razeni; Non-Governmental Organization for Young People with Disabilities Vivere; Public Association Center for Rehabilitation and Social Integration of Children with Intellectual Disabilities “Cultum” and SOS Autism; Chisinau (Republic of Moldova);
- JS17 Joint submission 17 submitted by: Promo-Lex and Media Center; Chisinau and Tiraspol (Republic of Moldova);
- JS18 Joint submission 18 submitted by: Promo-LEX Association; Mental Disability Advocacy Centre, (MDAC); Centre of Legal

JS19 Assistance for People with Disabilities (CAJPD) and Moldovan Institute for Human Rights; Chisinau (Republic of Moldova); Joint submission 19 submitted by: Rehabilitation Centre for Torture Victims (RCTV) “Memoria” and Promo-LEX Association; Chisinau (Republic of Moldova).

National human rights institutions:

CPEDEE Council on the Prevention and Elimination of Discrimination and Ensuring Equality; Chisinau (Republic of Moldova);  
Ombudsperson’s Office People’s Advocate Office of Moldova; Chisinau (Republic of Moldova).

Regional intergovernmental organizations:

CoE Council of Europe; Strasbourg (France);  
OSCE/ODHIR Organisation for Security and Cooperation in Europe, Office for Democratic Institutions and Human Rights, Warsaw (Poland).

<sup>2</sup> The following abbreviations are used in UPR documents:

ICESCR International Covenant on Economic, Social and Cultural Rights  
OP-ICESCR Optional Protocol to ICESCR  
ICRMW International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families  
CRPD Convention on the Rights of Persons with Disabilities  
OP-CRPD Optional Protocol to CRPD.

<sup>3</sup> See A/HRC/19/18, paras 76.2 and 76.3.

<sup>4</sup> JS16, p. 8.

<sup>5</sup> JS14, para. 28.

<sup>6</sup> JS16, p. 8.

<sup>7</sup> Ombudsperson’s Office, p. 5.

<sup>8</sup> CND, p. 6, para. 2.

<sup>9</sup> Ombudsperson’s Office, p. 5.

<sup>10</sup> JS14, para. 28.

<sup>11</sup> JS16, p. 8.

<sup>12</sup> CPEDEE, para. 2.8.

<sup>13</sup> Ombudsperson’s Office, p. 4.

<sup>14</sup> CoE, p. 8.

<sup>15</sup> JS1, para. IV.

<sup>16</sup> JS11, para. 2.7.

<sup>17</sup> Convention of the Council of Europe on preventing and combating violence against women and domestic violence.

<sup>18</sup> HRIC/CIDO, para. 7.

<sup>19</sup> European Commission against Racism and Intolerance. CoE, p. 4.

<sup>20</sup> JS14, para. 28.

<sup>21</sup> JS15, p. 6.

<sup>22</sup> JS5, p. 6.

<sup>23</sup> See A/HRC/19/18, paras 75.5-75.12; 73.6 and 73.28.

<sup>24</sup> LRCM, para. 14. See also CoE, p. 3 and JS5, p. 5.

<sup>25</sup> JS5, p. 5.

<sup>26</sup> LRCM, para. 20.

<sup>27</sup> JS5, p. 6.

<sup>28</sup> GENDERDOC-M, p. 4.

<sup>29</sup> LRCM, para. 20.

<sup>30</sup> JS5, p. 7.

<sup>31</sup> JS5, p. 6.

<sup>32</sup> GENDERDOC-M, p. 4.

<sup>33</sup> LRCM, para. 20.

<sup>34</sup> CPEDEE, para. 6.3.

<sup>35</sup> CPEDEE, para. 6.4.

<sup>36</sup> GENDERDOC-M, p. 3.

- <sup>37</sup> JS5, pp. 9 and 10.  
<sup>38</sup> JS15, p. 14.  
<sup>39</sup> OSCE/ODIHR, p. 11. See also JS9, p. 14.  
<sup>40</sup> JS5, p. 12.  
<sup>41</sup> GENDERDOC-M, p. 2.  
<sup>42</sup> JS1, para. 14.  
<sup>43</sup> OSCE/ODIHR, p. 4.  
<sup>44</sup> JS1, para. IV.  
<sup>45</sup> See also JS18, para. 9.  
<sup>46</sup> CND, pp. 1 and 2. See also JS18, para. 6 and Ombudperson's Office, p. 4.  
<sup>47</sup> CND, pp. 5 and 6.  
<sup>48</sup> JS18, para.15.  
<sup>49</sup> JS3, para. 3.  
<sup>50</sup> JS16, p. 2.  
<sup>51</sup> JS16, p. 9.  
<sup>52</sup> CND, p. 6, paras 4 and 5.  
<sup>53</sup> CPEDEE, para. 3.10.  
<sup>54</sup> JS18, para. 17.  
<sup>55</sup> See also Ombudperson's Office, p. 5.  
<sup>56</sup> Ombudperson's Office, p. 1.  
<sup>57</sup> Ombudperson's Office, p. 1.  
<sup>58</sup> European Commission for Democracy through Law.  
<sup>59</sup> CoE, p. 10.  
<sup>60</sup> JS5, p. 5. See also ECRI/CoE, p. 3 and CPEDEE, para. 1.1.  
<sup>61</sup> CPEDEE, para. 1.2.  
<sup>62</sup> CPEDEE, para. 1.4.  
<sup>63</sup> GENDERDOC-M, p. 4.  
<sup>64</sup> LRCM, paras 14-18.  
<sup>65</sup> JS5, p. 6.  
<sup>66</sup> CPEDEE, para. 1.6.  
<sup>67</sup> CPEDEE, para. 1.7.  
<sup>68</sup> GENDERDOC-M, p. 5, para. 3.  
<sup>69</sup> LRCM, para. 20.  
<sup>70</sup> JS5, p. 7.  
<sup>71</sup> JS11, para. 5.8.  
<sup>72</sup> JS5, pp. 6-7.  
<sup>73</sup> JS5, p. 7.  
<sup>74</sup> JS5, p. 8.  
<sup>75</sup> JS6, p. 7.  
<sup>76</sup> JS6, p. 8.  
<sup>77</sup> CoE, p. 2.  
<sup>78</sup> CoE, p. 3.  
<sup>79</sup> CoE, p. 2.  
<sup>80</sup> JS5, p. 5.  
<sup>81</sup> Lumos, para. 1) b) i).  
<sup>82</sup> Lumos, para. 3) a) iii).  
<sup>83</sup> JS11, para. 5.1.  
<sup>84</sup> JS11, para. 5.4.  
<sup>85</sup> JS9, p. 12. See also HRIC/CIDO, para. 25; CoE, p. 3 and OSCE/ODIHR, p. 11.  
<sup>86</sup> JS9, p. 14.  
<sup>87</sup> CPEDEE, para. 5.4.  
<sup>88</sup> HRIC/CIDO, para. 27.  
<sup>89</sup> CND, p. 6.  
<sup>90</sup> JS12, para. III, 5.  
<sup>91</sup> JS17, para. IV, 2.  
<sup>92</sup> COTAARM, para. 8.



- <sup>93</sup> COTAARM, para. 11.  
<sup>94</sup> COTAARM, para. 12.  
<sup>95</sup> GENDERDOC-M, p. 2.  
<sup>96</sup> GENDERDOC-M, p. 3. See also JS5, p. 11.  
<sup>97</sup> GENDERDOC-M, p. 4. See also GENDERDOC-M, p. 2; JS5, p. 12 and JS6, p. 6.  
<sup>98</sup> GENDERDOC-M, p. 3.  
<sup>99</sup> JS5, p. 12.  
<sup>100</sup> JS4, para. 32.  
<sup>101</sup> JS4, para. 34.  
<sup>102</sup> HRIC/CIDO, para. 24.  
<sup>103</sup> JS10, para. 41.  
<sup>104</sup> JS10, para. 43.  
<sup>105</sup> JS10, paras 45. See also paras 44 and 46.  
<sup>106</sup> HRIC/CIDO, para. 12.  
<sup>107</sup> JS14, paras 12-13.  
<sup>108</sup> HRIC/CIDO, para. 15.  
<sup>109</sup> JS14, para. 16.  
<sup>110</sup> See also JS19, para. 12.  
<sup>111</sup> CoE, p. 2. See also p. 1.  
<sup>112</sup> JS19, para. III.  
<sup>113</sup> JS19, para. 18. See also JS6, p. 7.  
<sup>114</sup> JS19, para. 17.  
<sup>115</sup> JS19, para. 20. See also paras 21-29.  
<sup>116</sup> JS19, para. III, 1.  
<sup>117</sup> JS19, para. III, 7.  
<sup>118</sup> JS6, p. 8.  
<sup>119</sup> JS16, p. 7.  
<sup>120</sup> JS6, pp. 8 and 9.  
<sup>121</sup> JS15, p. 4.  
<sup>122</sup> JS18, paras 25, 26 and 29.  
<sup>123</sup> JS18, para. 27. See also JS16, p. 6.  
<sup>124</sup> JS6, p. 10.  
<sup>125</sup> JS16, p. 8.  
<sup>126</sup> JS15, p. 4.  
<sup>127</sup> JS18, para. 28.  
<sup>128</sup> JS5, p. 3. See also JS6, p. 6.  
<sup>129</sup> See also GENDERDOC-M, p. 3.  
<sup>130</sup> JS5, p. 5.  
<sup>131</sup> Ombudsperson's Office, p. 3.  
<sup>132</sup> JS19, para. 12. See also paras 30-38.  
<sup>133</sup> JS19, para. III, 6.  
<sup>134</sup> Ombudsperson's Office, p. 4.  
<sup>135</sup> JS1, para. 4. See A/HRC/19/18, paras 73.8; 73.11; 73.30; 73.31; 73.32; 73.33; 73.34; 74.1; 75.28.  
<sup>136</sup> JS1, paras 5 and 8-13.  
<sup>137</sup> Ombudsperson's Office, p. 4.  
<sup>138</sup> CPEDEE, paras 2.4 and 2.5.  
<sup>139</sup> JS1, paras 1, 2, 15-19.  
<sup>140</sup> JS11, para. 2.4.  
<sup>141</sup> See also JS1, paras 6; 20-26; 28-31.  
<sup>142</sup> CPEDEE, para. 2.9.  
<sup>143</sup> Ombudsperson's Office, p. 4.  
<sup>144</sup> JS1, para. IV.  
<sup>145</sup> JS1, para. 27.  
<sup>146</sup> JS1, para. IV.  
<sup>147</sup> Ombudsperson's Office, pp. 1 and 2.  
<sup>148</sup> Ombudsperson's Office, p. 4.

- 149 Council of Europe's Group of Experts on Action against Trafficking in Human Beings.  
150 CoE, p. 5.  
151 See A/HRC/19/18, paras 75.36 and 75.37.  
152 See also CoE, p. 11.  
153 LRCM, paras 10 to 13. See also JS6, p. 3.  
154 LRCM, para. 20. See also JS6, p. 5 and JS9, p. 11.  
155 JS15, p. 15.  
156 JS15, p. 16.  
157 JS15, p. 7.  
158 JS18, para. 10. See also paras. 11 to 14.  
159 CPEDEE, paras 3.1-3.5.  
160 JS18, para. 10.  
161 JS16, pp. 8 and 9.  
162 JS15, p. 1. See also JS18, paras 29-35.  
163 JS15, p. 2. See also JS18, para. 35.  
164 Ombudsperson's Office, p. 2.  
165 Ombudsperson's Office, p. 2.  
166 Ombudsperson's Office, p. 3. See also CoE, p. 11.  
167 JS6, p. 5.  
168 LRCM, para. 6. See also LRCM paras 7 and 8 and CoE, p. 12.  
169 LRCM, para. 20. See also Ombudsperson's Office, p. 3.  
170 JS3, para. 14. See also CPEDEE, paras 4.1, 4.2 and 4.3.  
171 JS15, p. 10.  
172 CPEDEE, para. 4.5. See also JS13, para. 52.  
173 See also JS4, para. 57.  
174 JS4, para. 28.  
175 JS4, para. 29.  
176 JS3, para. 18.  
177 JS3, para. 18.  
178 JS15, pp. 9 and 10.  
179 CPEDEE, para. 4.6.  
180 JS3, para. 17. CPEDEE, para. 4.3.  
181 JS3, para. 18.  
182 JS13, para. 37.  
183 JS13, para. 52.  
184 FH, para. 2.1.  
185 JS8, pp. 3 and 4.  
186 JS8, p. 4.  
187 FH, para. 3.3.  
188 FH, para. 5.1.  
189 FH, para. 5.3.  
190 FH, para. 6.5.  
191 JS8, p. 7. See also pp. 3-4.  
192 HRIC/CIDO, para. 29.  
193 JS14, para. 23.  
194 JS8, p. 5.  
195 JS9, para. 1.1.  
196 JS9, para. 1.1. 1).  
197 HRIC/CIDO, para. 16.  
198 HRIC/CIDO, para. 17. See also JS14, paras 14 and 16.  
199 JS4, para. 11.  
200 JS4, para. 16.  
201 Promo-Lex, para. 5.  
202 Promo-Lex, para. III.2)  
203 Promo-Lex, para. 12.  
204 CPEDEE, para. 2.1.

- 205 OSCE/ODIHR, pp. 12 and 13.  
206 JS3, para. 20.  
207 JS11, para. 1.3.  
208 JS11, para. 1.5.  
209 Ombudsperson's Office, p. 4. See also JS3, paras 21-22 and JS10, para. 32.  
210 JS2, p. 1.  
211 JS2, p. 2.  
212 JS2, p. 4.  
213 JS11, para. 3.1.  
214 JS11, para. 3.11. See also Ombudsperson's Office, p. 4.  
215 HH, para. 29.  
216 ProAbility, para. 18.  
217 JS16, p. 6.  
218 HH, para. 19. See also HH, para. 42 and JS16, p. 6.  
219 Ombudsperson's Office, p. 5. See also Stoics, para. 11.  
220 Ombudsperson's Office, p. 5.  
221 Ombudsperson's Office, p. 1.  
222 JS4, para. 38.  
223 JS4, para. 40.  
224 Ombudsperson's Office, p. 2.  
225 JS4, para. 46.  
226 JS4, para. 47. See also Ombudsperson's Office, p. 3.  
227 Positive Initiative, para.5.  
228 Positive Initiative, para.8.  
229 Lumos, para. 2) e) ii).  
230 Lumos, para. 2) e) iii).  
231 Lumos, para. 3) f) iv).  
232 Lumos, para. 3), f) v).  
233 DIA, para. 4.  
234 DIA, para. 12 and paras 13-15.  
235 DIA, para. 21.  
236 JS4, para. 53. See also para. 55.  
237 JS4, para. 56.  
238 ADF International, para. 27.  
239 JS14, para. 3.  
240 HRIC/CIDO, para. 6.  
241 HRIC/CIDO, para. 7.  
242 JS14, para. 9.  
243 HRIC/CIDO, para. 8.  
244 HRIC/CIDO, para. 9.  
245 See also JS10, para. 24. See also JS3, para. 22.  
246 JS9, p. 13.  
247 JS10, paras 23 and 24.  
248 JS3, para. 25. See also JS9, p. 14.  
249 JS10, para. 37.  
250 JS16, p. 10. See also JS3, para. 10.  
251 JS16, p. 11.  
252 Lumos, para. 3) c) i). See also Ombudsperson's Office, p. 1 and JS3, para.10.  
253 See A/HRC/19/18, paras 75.13; 75.11 and 75.21. See also JS10, para. 4 and JS18, paras 2, 3 and 17.  
254 See also JS3, para. 3 and CND, p. 1.  
255 HH, para. 15. See also paras 16, 17 and 18.  
256 HH, para. 21. See also JS3, para. 4 and JS18, para. 18.  
257 HH, para. 27. See also paras 35 and 36.  
258 CND, pp. 4 and 5.  
259 JS10, para. 12.  
260 Lumos, para. 3) b) ii). See also para. 3) b) iv).

- 261 Lumos, para. 3) b) iii).
- 262 CND, p. 6 para. 6. See also JS6, p. 10.
- 263 JS16, p. 10. See also JS3, para. 10.
- 264 JS18, para. 24.
- 265 JS10, para. 13.
- 266 HH, para. 22. See also ProAbility, paras 16-21.
- 267 Low Vision, para. 12.
- 268 Low Vision, para. 13.
- 269 CND, p. 3.
- 270 CPEDEE, para. 3.6.
- 271 Stoics, para. 17.
- 272 JS3, para. 9.
- 273 JS16, p. 3.
- 274 CND, p. 6, para. 9. See also CPEDEE, para. 3.12 and JS16, p. 3.
- 275 CND, p. 6, para 10.
- 276 CPEDEE, para. 3.11.
- 277 JS3, para. 11.
- 278 JS16, p. 3.
- 279 HRIC/CIDO, para. 5.
- 280 JS3, para. 19.
- 281 CPEDEE, para. 5.2.
- 282 JS9, p.13.
- 283 JS10, para 20.
- 284 JS9, p. 14.
- 285 See A/HRC/19/18, paras 73.4; 73.5; 73.10; 73.24; 73.25; 73.61 and 75.32.
- 286 JS10, para. 16.
- 287 JS10, para. 17.
- 288 JS3, para. 23.
- 289 JS9, p. 12.
- 290 JS10, para.33.
- 291 JS9, p. 13.
- 292 JS3, para. 21.
- 293 JS10, para. 25.
- 294 JS3, para. 25.
- 295 JS9, p. 14.
- 296 JS9, p. 14.
- 297 COTAARM, para. 14.
- 298 COTAARM, para. 15.
- 299 COTAARM, para. 17.
- 300 JS12, para. 1.
- 301 See A/HRC/19/18, paras 73.63; 75.41 and 75.42.
- 302 JS17, para. 13. See also JS12, para. 11.
- 303 JS12, para. 14.
- 304 Ombudsperson's Office, p. 5.
- 305 Ombudsperson's Office, p. 5.
- 306 JS12, para. III, 1.
- 307 Ombudsperson's Office, p. 5. See also JS12, para. III, 4.
- 308 JS7, para. 9.
- 309 JS2, para. 5.
- 310 JS12, paras 32-33 and 35-37.
- 311 JS12, paras 16 and 17.
- 312 JS12, paras 30 and 31.
- 313 JS12, paras 18-25.
- 314 JS8, p. 5.
- 315 JS17, para. 10. See also para. 18.
- 316 JS12, para. 40.

- <sup>317</sup> JS5, p. 4.  
<sup>318</sup> JS17, para. 22.  
<sup>319</sup> JS17, para. 29.  
<sup>320</sup> Ombudperson's Office, p. 5.  
<sup>321</sup> JS17, para. IV, 1.  
<sup>322</sup> JS17, para. IV, 3.  
<sup>323</sup> JS17, para. IV, 4.
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