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**Promotion and protection of all human rights, civil,
political, economic, social and cultural rights,
including the right to development.**

Visit to Albania

Report of the Independent Expert on protection against violence and discrimination based on sexual orientation and gender identity, Graeme Reid*, **

Summary

In the present report, the Independent Expert on protection against violence and discrimination based on sexual orientation and gender identity, Graeme Reid, presents findings from his official visit to Albania, conducted from 1 to 12 July 2024. Drawing on information collected before, during and after the visit, the Independent Expert evaluates the level of adherence in Albania to national and international human rights standards aimed at addressing violence and discrimination against individuals based on their sexual orientation and gender identity. The Independent Expert offers an in-depth examination of the human rights situation of lesbian, gay, bisexual, transgender and other gender-diverse persons in Albania, highlighting both positive developments and ongoing challenges. The report also includes recommendations to strengthen protections against violence and discrimination in these areas.

* The summary of the report is being circulated in all official languages. The report itself, which is annexed to the summary, is being circulated in the language of submission only.

** The present report was submitted to the conference services for processing after the deadline for technical reasons beyond the control of the submitting office.



Annex

Report of the Independent Expert on protection against violence and discrimination based on sexual orientation and gender identity, Graeme Reid, on his visit to Albania

I. Introduction

A. Visit

1. The Human Rights Council established the mandate of the Independent Expert on protection against violence and discrimination based on sexual orientation and gender identity in its resolution 32/2, and subsequently extended it in its resolutions 41/18 and 50/10. The mandate reflects the Council's recognition of the widespread and systemic nature of discrimination and violence against lesbian, gay, bisexual, transgender and other gender-diverse (LGBT) people around the world, and the insufficient action taken to address these harms. The purpose of country visits under this mandate is to assess both achievements and challenges, identify good practices and provide guidance to States on how to prevent and respond to violence and discrimination.

2. From 1 to 12 July 2024, the Independent Expert conducted an official visit to Albania to evaluate how national and international human rights standards were being applied to protect people from violence and discrimination based on sexual orientation and gender identity. The Independent Expert's visit included time in the capital, Tirana, where he engaged with national-level authorities and equality bodies, as well as time in Shkodër, Kukës, Vlorë, Sarandë and Korçë, where he met with municipal officials. The Independent Expert is grateful to the Government of Albania for the invitation to undertake this visit and for the high level of cooperation. A visit of this nature requires significant coordination, and the Independent Expert would like to specifically thank the Ministry for Europe and Foreign Affairs for coordinating engagement across national and local authorities. Throughout the visit, officials demonstrated a commitment to constructive dialogue and generously shared their time and expertise on issues related to sexual orientation and gender identity.

3. A highlight of the visit of the Independent Expert was the opportunity to meet with many LGBT people, as well as dedicated civil society representatives. Their insights, experiences and analyses painted a clear picture of a vibrant, courageous and innovative movement in Albania. One interlocuter remarked: "We appreciate the chance to share our experiences that could help prevent similar instances of discrimination in the future".

4. The Independent Expert was especially encouraged by the strong partnerships between women's rights advocates and LGBT groups, united by their shared commitment to advancing equality and combating gender-based violence. The Independent Expert also benefited greatly from the contributions of a range of experts who helped to contextualize the realities facing LGBT people in Albania.

5. The Independent Expert would also like to extend his thanks to the resident coordinator and the United Nations country team for their advice, logistical support and valuable engagement across their respective areas of expertise relevant to the mandate.

6. The Independent Expert welcomed the opportunity to visit a country that has shown a strong commitment to aligning its national laws and policies with international human rights standards, while also playing an active and positive role internationally in support of LGBT rights. These efforts are unfolding in the context of the country's transition over recent decades from a communist dictatorship to a democratic society and market economy – a complex and often challenging process that has dramatically reshaped the country's political and economic landscape.

7. Efforts are under way in Albania to advance its European Union membership ambitions; the country has been an official candidate since 2014 and the Council of the

European Union agreed to open accession negotiations in 2020. The European Union accession process has been a significant driver of legal and policy reforms, in particular in relation to human rights.

8. In their meetings with the Independent Expert, national and municipal authorities consistently expressed their commitment to non-discrimination and equality, which is encouraging. This commitment, combined with the country's robust legal framework, provides a promising foundation for further progress on human rights. However, it was also clear that the lived experiences of LGBT people and the perceptions of State officials did not always align. Civil society groups often described realities that diverged from official accounts, revealing gaps among law, policy and practice. This raises an important question regarding implementation of the country's legal and policy framework on non-discrimination: are such commitments rhetorical, passed from one to another without being fully internalized, or is there genuine and sustained political will to deliver on them? To borrow the words of the Albanian writer Ismail Kadare: "It was only a phrase that went from mouth to mouth and was never quite swallowed". Ensuring effective implementation of national laws, policies, strategies and action plans in Albania – especially at the local level – will be crucial to fulfil the promises contained in those instruments and made by the authorities who adopted them.

B. National, regional and global context

9. The progress made in Albania in protecting individuals from violence and discrimination based on sexual orientation and gender identity must be understood within the broader trajectory of its political transformation. The country's reckoning with its past is palpable in Tirana, where several museums document the legacy of authoritarianism, repression and State control. This confrontation with history informs the country's present-day commitment to human rights, as its leaders strive to break from a past marked by political persecution and isolation. The country's aspirations for accession to the European Union, its active engagement in international organizations and human rights forums and the development of a robust legal and policy framework signal a political will to align with democratic and inclusive values.

10. Following the death of the former President, Enver Hoxha in 1985 and the collapse of communism in Eastern Europe, systemic change began to take root. By 1990, Albania had legalized opposition parties, reinstated religious freedoms and begun to dismantle the instruments of repression. The country's first democratic transition in 1992, marked by the victory of the Democratic Party under Sali Berisha, ended decades of international isolation and ushered in foreign investment, economic assistance and political reforms. However, the transition was not without turmoil. Economic instability, political unrest and the 1997 financial collapse – triggered by fraudulent pyramid schemes – plunged the country into crisis, requiring United Nations intervention.

11. Notwithstanding these challenges, the long-term trajectory of Albania has been one of democratization and integration into the global community. Since joining the North Atlantic Treaty Organization in 2009, the country has worked steadily towards European Union membership, with successive Governments implementing reforms to strengthen rule of law, human rights protections and social inclusion. Under the Prime Minister, Edi Rama, and the Socialist Party since 2013, significant strides have been made in addressing the lingering effects of the country's authoritarian past.

12. It is against this backdrop that Albania has emerged as a regional leader in advancing legal protections against discrimination and violence based on sexual orientation and gender identity. The country's commitment to human rights is a reflection of not only its international obligations, but also a conscious national effort to break with past legacies of repression and exclusion. An important aim of the Independent Expert's visit was to assess how such protections have been developed and how they are being implemented in practice, in particular as efforts are being made to reconcile the country's authoritarian history with its aspirations for an open, democratic and inclusive society.

13. The legal framework in Albania is notably strong. The law on protection from discrimination of 2010 provides explicit protections for individuals on the grounds of sexual orientation, gender identity and sex characteristics. Same-sex relations were decriminalized and enhanced penalties for bias-motivated crimes, including those based on sexual orientation and gender identity, were introduced as a result of amendments to the Criminal Code. Other key legislation, such as the Labour Code and the law on social housing, are aimed at protecting marginalized groups and public health laws apply universally without discrimination. These legal foundations place Albania ahead of many countries in the region in terms of formal equality.

14. However, some gaps remain. There is no legal recognition of same-sex partnerships or marriage, nor any procedure for legal gender recognition for transgender individuals. The Ministry of Health and Social Protection has taken proactive steps to address these protection gaps, including drafting proposals to amend the Family Code to extend recognition to same-sex couples.

15. Guiding much of this work is the third national action plan for LGBTI+ persons (2021–2027), which aligns closely with the national strategy for gender equality. Together, these plans are designed to advance social and economic rights, promote political participation and reduce gender-based and domestic violence, while creating measurable goals for progress.

16. Notwithstanding these strong policy commitments, there are obstacles to practical implementation. Limited resources, high staff turnover and a lack of public awareness of LGBT issues have slowed progress on the ground. On the other hand, there is clear political will: national and municipal officials alike expressed a commitment to improving protections and fostering equality. As one municipal official noted, shifting mindsets and social attitudes takes time, and legal reforms are an important driver of this change. One civil society group expressed both approval of the promise of the national action plan for LGBTI+ persons (2021–2027) and frustration with its implementation: “If the plan were properly implemented, 95 per cent of our concerns would be gone from 2027”.

17. The country’s aspirations for European Union membership play a significant role in sustaining progress. Alignment with the European Union remains a major incentive and benchmark for advancing human rights protections, including for LGBT people. Internationally, the active participation of Albania in forums such as the LGBTI Core Group, the Organization for Security and Cooperation in Europe, the Organization of Islamic Cooperation and the Council of Europe further demonstrates its commitment to promoting equality and combating discrimination.

18. However, discrepancies remain between the legal framework and the lived experiences of LGBT people. There are reports from civil society organizations of ongoing discrimination in areas such as employment, healthcare and policing, and of the fact that many such incidents go unreported or are inadequately documented. This situation is compounded by the lack of disaggregated data on incidents related to sexual orientation and gender identity, making it difficult to have an accurate assessment of the situation.

19. Many in Albania take pride in the country’s tradition of tolerance, in particular in matters of religious diversity. However, some interlocutors expressed growing concern about the recent rise of intolerant rhetoric, often rooted in misinformation and amplified by some political and media figures. Narratives that falsely portray LGBT people as a threat to family values or children have gained disproportionate attention in public discourse. One notable example is the persistent myth that LGBT activists seek to replace the terms “mother” and “father” on birth certificates with “parent 1” and “parent 2”, overshadowing real legal challenges faced by same-sex couples seeking recognition as co-parents.

20. While some of this rhetoric crosses the line into hate speech – which is explicitly prohibited under criminal law in Albania – other harmful narratives fall short of criminal thresholds but still contribute to an environment of stigma and discrimination. In such cases, it is vital for public officials and prominent figures to take an active role in promoting accurate information and denouncing harmful stereotypes. The establishment of the Alliance Against Hate Speech in 2019, bringing together national institutions such as the People’s Advocate, the Commissioner for Protection from Discrimination and the Albanian Media

Council reflects a positive step towards countering harmful narratives and promoting respectful public discourse.

21. Overall, the country's legislative achievements and ongoing policy efforts constitute a strong foundation for advancing the rights of LGBT people. With continued investment in implementation, public education and political leadership, Albania is well positioned to build on its progress and create a more inclusive society in which everyone can live in dignity and security.

II. Institutional, policy and legal framework

22. Key institutions for protecting and promoting the rights of LGBT individuals have been established in Albania. Central among them is the Commissioner for Protection from Discrimination, which was established by the law on protection from discrimination of 2010 and functions as the country's equality body in line with European standards. Pursuant to that law, which was amended in 2020, discrimination on multiple grounds, including sexual orientation, gender identity and sex characteristics, is prohibited. The Commissioner actively promotes human rights under this framework and has handled various cases involving discrimination against LGBT individuals and has issued decisions against both public and private entities. In 2024, the Commissioner reviewed 12 hate speech cases, including 2 based on sexual orientation and gender identity. The Commissioner also handled five discrimination complaints related to sexual orientation and gender identity, most of which related to goods and services and one of which involved employment. As a result of handling those complaints, four decisions were issued: one finding of no discrimination, one of inadmissibility and two terminations of investigative procedures. Issues reported in complaints to the Commissioner included employment refusal, denial of services and public hate speech. However, the overall number of complaints remained low, suggesting underreporting. In parallel, the People's Advocate, established by the Constitution in 1998 and operational since 1999, monitors compliance by public institutions with human rights obligations, including the protection of the rights of LGBT persons.

23. Within the central Government, matters relating to the rights of LGBT persons are coordinated by the Sector for Social Inclusion under the Ministry of Health and Social Protection. However, the responsibility to safeguard these rights extends across all Government ministries, each expected to address LGBT inclusion within their relevant mandates. At the local level, municipal governments are tasked with ensuring equal treatment for LGBT individuals, including by working alongside local institutions to uphold national laws and standards.

24. The ambition to join the European Union remains a defining national priority, with overwhelming public support (exceeding 90 per cent). European Union integration is viewed as vital to the country's political and economic trajectory, and the visa liberalization agreement of 2010 marked a significant step in this process. The conditions for accession, set out by the European Union in March 2020, continue to guide the reform agenda in Albania, which is focused on effecting judicial and electoral reforms, improving public administration and addressing organized crime and corruption. The protection of human rights, including those of minorities, is central to these accession criteria. Migration also features prominently, given that the European Union remains concerned about the number of Albanians seeking asylum in member States. In 2022, 10,650 Albanians applied for asylum in European Union countries, accounting for 1.8 per cent of all asylum-seekers in the European Union.¹

25. The European Parliament, in its resolution of 12 July 2023 on the 2022 Commission Report on Albania, acknowledged the country's steadfast commitment to European Union integration and its alignment with European Union foreign and security policies. However, the need for stronger parliamentary oversight, enhanced transparency and more advanced digital governance was also stressed. In addition, there were calls in the 2022 Commission Report for political consensus on electoral reforms ahead of the 2025 parliamentary elections.

¹ [Albanian asylum-seekers in the European Union and European Free Trade Association throughout the years, based on the destination, age group and types of court verdicts – Open Data Albania.](#)

Through this process, the European Union continues to play a critical role in shaping the human rights landscape of Albania, reinforcing the importance of institutional protections, legal reforms and inclusive policies, including for LGBT individuals.

26. While tangible legal progress has been made in Albania in promoting the rights of LGBT people, notable gaps persist. In article 8 of the Constitution, the broad principles of equality and non-discrimination are affirmed, but there is no explicit mention of sexual orientation, gender identity or sex characteristics. Under the Family Code, same-sex marriage is not directly prohibited but marriage is defined strictly as a union between a man and a woman. Since the decriminalization of same-sex relations in Albania in 1995, the severe penalties that previously targeted same-sex couples have been abolished. However, there is still no legal recognition of same-sex partnerships, nor the rights of LGBT individuals to civil unions, joint adoption or access to assisted reproductive technologies. Surrogacy laws similarly exclude same-sex couples.

27. Several key legislative measures have been adopted to bring Albania in line with European Union standards. Under the law on protection from discrimination of 2010, discrimination based on sexual orientation, gender identity and sex characteristics is explicitly prohibited across multiple domains, including employment, education, healthcare and access to goods and services. Workplace protections were reinforced pursuant to amendments to the Labour Code in 2015, and, following an amendment to the law on civil status in 2020, changes in legal name and legal gender by court decision, when supported by medical documentation, are permitted. However, a comprehensive law on legal gender recognition has yet to be introduced in Albania, leaving transgender individuals without an accessible administrative process.

28. Oversight of LGBT rights in Albania is carried out primarily by the Commissioner for Protection from Discrimination and the People's Advocate. The Commissioner investigates complaints of discrimination and has issued decisions supporting LGBT individuals in cases involving public authorities and service providers. The People's Advocate monitors public institutions' treatment of LGBT persons and may propose legislative reforms. The recommendations of the People's Advocate, although not legally binding, have grown in influence owing to increased institutional awareness and parliamentary monitoring of their implementation.

29. The national action plan for LGBTI+ persons (2021–2027) contains a comprehensive strategy to advance equality by improving access to public and specialized services nationwide, strengthening legal protections and access to justice and fostering a more inclusive, non-discriminatory society. The plan is aligned with the country's broader commitments to gender equality, sustainable development and international human rights standards. It serves as an important road map for combating violence and discrimination.

30. These legal advancements notwithstanding, public attitudes remain a major obstacle. Surveys have consistently revealed high levels of prejudice and social exclusion. A survey of young people conducted in 2011 found that more than half of respondents would not want a homosexual neighbour.² The results of a European Social Survey conducted in 2012 and 2013 showed Albania as having the highest levels of homophobia among the countries surveyed.³ Furthermore, a survey conducted by the National Democratic Institute revealed that 65 per cent of lesbian, gay, bisexual, transgender and intersex (LGBTI) individuals surveyed in Albania had experienced discrimination and that 58 per cent of the general population would not support a political party that advocated for LGBTI rights.⁴ Such societal stigma likely contributes to the underreporting of discrimination and violence, notwithstanding the existence of legal protections.

31. Overall, progress has been made in Albania. Legislative alignment with European Union standards has advanced and institutional mechanisms such as the Commissioner for Protection from Discrimination and the People's Advocate have grown stronger. National strategies to address discrimination and promote inclusion are in place and the Council of

² See <https://library.fes.de/pdf-files/bueros/albanien/10056.pdf>.

³ See <https://microdata.worldbank.org/index.php/catalog/2931>.

⁴ See www.lgbti-era.org/countries/albania/.

Europe recognized improvements in the situation for LGBT individuals, including in relation to safety, protection from violence and access to services, in particular in Tirana, during the period from 2016 to 2020.⁵ However, ongoing significant challenges, including the lack of legal gender recognition, the absence of family rights for same-sex couples and the persistence of deep-rooted societal stigma, underscore the need for continued legal reforms, public education and the full application of existing protections to secure lasting equality for LGBT people in Albania.

A. Right to housing

32. The right to housing for LGBT individuals in Albania is supported by a legal framework that includes the law on social housing of 2018 and the law on protection from discrimination of 2010. Sexual orientation and gender identity are formally designated as eligibility criteria for housing support under the social housing law in recognition of the specific vulnerabilities of LGBT persons, including family rejection, school-based bullying and workplace discrimination. This legal framework has had a meaningful impact, in particular for transgender individuals, by providing a basis for prioritization in gaining access to housing services. In addition, discrimination on the grounds of sexual orientation and gender identity is explicitly prohibited under the law on protection from discrimination, reinforcing the right to equal treatment in housing and other social services.

33. Notwithstanding these legal protections, access to housing remains a persistent challenge owing to gaps in implementation, inadequate enforcement and the absence of necessary by-laws. In practice, institutions work according to outdated legal provisions, limiting the effectiveness of current laws and leaving LGBT persons with the protections to which they are entitled. Structural barriers and social stigma further undermine access. A central concern is the fear of disclosure during the application process: to access LGBT-specific housing benefits, individuals must self-identify. This requirement raises serious concerns about confidentiality. Many avoid applying for support owing to the risk that sensitive personal information may be exposed during interactions with municipal authorities. The application process itself can be lengthy and burdensome, with extensive documentation requirements that are often difficult to meet. Some procedural requirements, such as obtaining approval from property owners, open the door to further discrimination.

34. The shortcomings in the implementation of legal protections for LGBT individuals in Albania have serious and far-reaching consequences, in particular for transgender persons. Discrimination, lack of legal gender recognition and financial precarity leave transgender women especially vulnerable to homelessness, exploitation and exclusion from social services. Even where support mechanisms exist, transgender individuals have reported feeling excluded or unsupported, citing restrictive rules around gender expressions, curfews and behaviour in shelters that can compromise their safety and dignity. More broadly, administrative and structural hurdles frequently push LGBT individuals to rely on informal networks for temporary shelter, which, in the most precarious cases, may result in unsafe or exploitative living conditions, including engagement in sex work as a means of survival.

35. In recognition of the persistent challenges experienced by LGBT individuals in gaining access to housing, the Government has developed emergency housing mechanisms, in particular for survivors of domestic violence. Pursuant to Council of Ministers Decision No. 327 of 2 June 2021, victims and their children may be placed in emergency shelters if assessed to be at high risk of continued exposure to domestic violence. Risk assessments and case management are conducted by the State Police and municipal coordinators on the basis of joint instructions from relevant ministries. Protection measures, including placement in shelters, can be ordered by the police or the court, with victims escorted by police and supported by dedicated local teams. While emergency shelters are an essential resource, they

⁵ See www.gov.uk/government/publications/albania-country-policy-and-information-notes/country-policy-and-information-note-sexual-orientation-and-gender-identity-albania-december-2019-accessible#assessment-1.

do not adequately address the long-term housing needs of LGBT persons or replace the need for specialized, inclusive housing solutions for marginalized groups.

36. The Streha Center, which operates the only dedicated shelter accommodating LGBT individuals from Albania and the wider region, remains the sole facility of its kind, providing safe housing and support services to those at risk. Established in 2015, it provides critical emergency accommodation for LGBT youth between 18 and 29 years of age who have experienced violence, family rejection or homelessness, and has supported 173 young people since its establishment. However, the facility faces significant challenges: it is consistently at full occupancy owing to its limited capacity and it is not equipped to meet the needs of older individuals or those requiring long-term housing solutions. In addition to these operational constraints, the Center's financial situation remains fragile. According to individuals who run the shelter, only 30 per cent of its budget is covered by the Ministry of Health and Social Protection, leaving it heavily dependent on external fundraising. There have also been credible concerns that its public advocacy work may place its limited Government funding at risk.

37. Notwithstanding important legal protections on paper, the lived reality for many LGBT persons in Albania is marked by housing instability, discrimination and systemic barriers. Comprehensive reforms to guarantee privacy, equitable access and long-term support are needed to protect LGBT people from discrimination and uphold their fundamental right to housing.

B. Right to education

38. The Independent Expert was unable to meet with the Ministry of Education during his country visit, but heard reports from civil society representatives and municipal officials highlighting the education sector as an area in urgent need of attention to address discrimination and bullying against LGBT students. Civil society research indicates troubling rates of discrimination against LGBT persons in schools by peers and, in some cases, school staff. This situation is exacerbated by the lack of accurate and inclusive information on sexual orientation and gender identity within the school curriculum, leaving LGBT students feeling isolated and unsupported. Bullying and discrimination have led some LGBT students to drop out of school, limiting their future employment opportunities and increasing their vulnerability to long-term marginalization.

39. One expert emphasized the growing need for engagement with schools to address harmful stereotypes and misconceptions about sexual orientation and gender identity, in particular in view of the rise in hostile rhetoric fuelled by misinformation. However, civil society organizations report limited progress in this area, with education authorities often reluctant to engage on these topics. According to one respondent, the Ministry of Education has resisted curriculum reforms owing to concerns about potential resistance from parents. Efforts to train teachers on LGBT issues have been undertaken within the framework of the national action plans for LGBTI+ persons, but these have been insufficient to address the widespread lack of competence and preparedness among educational staff.

40. These challenges notwithstanding, there are positive examples of effective intervention. In Shkodër, for instance, a child who was bullied at school owing to his perceived sexual orientation and subsequently abandoned by his family was successfully reintegrated into both his home and school environment. This was achieved through the collaborative efforts of the school psychologist and staff at the local family help centre, who worked to raise awareness about sexual orientation within both the school and the family. This case demonstrates the potential – even where resources are limited – for meaningful protection and reintegration when support systems operate effectively. and offers a valuable example of how discrimination can be addressed through coordinated community action.

41. Education represents both a vital opportunity and an ongoing challenge for LGBT individuals in Albania. While there have been meaningful steps towards creating more inclusive learning environments, persistent gaps remain that prevent many LGBT students from fully realizing their right to safe, supportive and high-quality education. Addressing

these challenges provides a crucial pathway to reducing discrimination, promoting equality and strengthening social cohesion.

42. The legal framework in Albania provides an important foundation for inclusive education. Under the law on reproductive health, the right of all individuals to receive comprehensive health education, including on sexual and reproductive health, without restrictions based on religion or ideology, is guaranteed. Pursuant to the law on the prevention and control of HIV/AIDS, HIV prevention education is integrated into school curricula. These laws reflect the country's commitment to fostering health and well-being through education. However, their potential remains fulfilled only in part, given that key topics relevant to LGBT people remain absent from official curricula and textbooks. In one study, more than 80 per cent of LGBT individuals surveyed reported a lack of information on LGBT sexual and reproductive health,⁶ underscoring the need for more comprehensive and inclusive educational content.

43. Encouragingly, there have been local initiatives and collaborations aimed at raising awareness of LGBT issues in schools. In partnerships with civil society organizations and international bodies, such as the United Nations Children's Fund and the United Nations Population Fund, training sessions and pilot programmes on gender equality, anti-discrimination and bullying prevention have been introduced. Some municipalities have supported awareness-raising activities in schools and, in collaboration with parent boards, have worked to promote acceptance of LGBT students and reduce family rejection. These localized efforts demonstrate the positive impact of targeted interventions and highlight a growing recognition of the importance of LGBT inclusion in education.

44. However, these promising developments have not translated into systemic, nationwide change. Surveys show that students who are LGBTI, Roma or living with disabilities experience the highest levels of exclusion from public schools, with nearly 20 per cent of LGBTI adolescents reporting experiences of bullying or discrimination based on their sexual orientation or gender identity⁷. Fear of stigma and retaliation prevents more than 80 per cent of LGBTI students from reporting discrimination, and school dropout due to bullying remains a serious concern. While some students have received meaningful support from teachers, psychologists and social workers, such support is ad hoc rather than part of a coordinated national strategy.

45. Resistance to the inclusion of LGBT persons at the institutional level has slowed broader progress. In recent years, the Ministry of Education has been hesitant to advance teacher training on LGBT inclusion and to implement reforms that would embed LGBT topics into curricula, citing concerns about public opposition. The absence of standard teacher training on LGBT issues and the use of outdated curricula have contributed to a lack of consistency in how schools address discrimination and support LGBT students. While education is identified as a priority area in the national action plan for LGBTI+ persons (2021–2027), implementation has been limited and cooperation between national and local authorities remains fragmented.

46. These challenges notwithstanding, there is a strong foundation on which to build a more inclusive education system. Albania has demonstrated an ability to advance progressive reforms in other areas of education, and legal principles that support equality and non-discrimination have been established. With renewed commitment, these same approaches can be applied to ensure that all students, regardless of their sexual orientation or gender identity, are respected, protected and given the tools that they need to thrive.

47. The groundwork for inclusive education has already been laid. By building on these efforts and addressing remaining shortcomings with determination, the country can create an education system in which diversity is celebrated, every student is valued and LGBT young people can learn and grow free from fear and discrimination.

⁶ See www.aleancalgbt.org/publication/albania-under-upr-aleanca-lgbti-and-ilga-worlds-joint-submission/.

⁷ See www.crca.al/en/crca-submits-to-un-human-rights-commission-the-report-on-the-situation-of-children-and-youth-in-albania-for-the-4th-upr-cycle/.

C. The right to health

48. The Ministry of Health and Social Protection holds a central role in the development and implementation of the national action plan for LGBTI+ people, working in coordination with other ministries to support implementation at both the national and local levels. In drafting the plan, the Ministry collaborated closely with international partners and remains responsible for delivering training across key sectors, including education, healthcare, law enforcement and social services. However, this work is challenged by limited resources.

49. A Ministry official acknowledged the ongoing difficulty in raising public awareness on non-discrimination, noting that the Ministry had sought to maximize its resources by delivering integrated training programmes that addressed the needs of all marginalized groups, including LGBT people. This practical approach helps to address multiple forms of discrimination simultaneously.

50. A key development is the Ministry's near-finalization of Albania's first national health protocol for transgender individuals, created in collaboration with civil society, medical experts and multiple ministries. This protocol, which will facilitate access to hormone therapy, is urgently needed owing to the country's lack of formal gender-affirming care and professional expertise. It will be distributed to family doctors nationwide, ensuring better healthcare access for transgender people.

51. Access to gender-affirming care remains limited. Albania does not offer gender-affirming surgeries and, while the upcoming hormone therapy protocol would help to address a critical gap, broader structural, financial and training capacities remain underdeveloped. Consequently, many transgender individuals are forced to seek care abroad, facing significant financial and logistical challenges.

52. The absence of a legal gender recognition process forces transgender people to navigate daily discrimination when their identity documents do not reflect their gender. As one activist described, legal gender recognition would offer transgender people much-needed security and dignity: "Legal gender recognition is a port that we can anchor in".

53. Albania has taken meaningful steps to strengthen its health system and improve protections for marginalized groups, including LGBT people. Through alignment with European Union standards and national reforms, Albania has built a legal framework that affirms the right to health for all. Key legislation, such as the law on reproductive health, guarantees access to sexual and reproductive health education without restrictions based on religion or ideology, while the law on the prevention and control of HIV/AIDS mandates the integration of HIV prevention education into school curricula. Albania is also among the few countries in Europe that explicitly prohibit discrimination based on gender identity, establishing an essential legal foundation for advancing equality in healthcare.

54. Building on this framework, the Ministry has developed specific programmes to support vulnerable groups, including country-wide mental health services, HIV treatment programmes and regular training for health professionals to strengthen inclusive care practices. Public education campaigns have further sought to promote non-discrimination across healthcare, education and social services.

55. This progress notwithstanding, considerable challenges continue to hinder LGBT individuals' full and equal access to healthcare. Discrimination within public medical institutions remains a persistent problem. Surveys indicate⁸ that 16 per cent of LGBTI individuals who sought medical care reported experiencing discrimination from healthcare staff, while 30 per cent avoided care entirely owing to fears of mistreatment. These concerns are particularly acute in sexual and reproductive health, in which more than 64 per cent of LGBTI respondents reported avoiding care in the past three years, citing concerns about confidentiality breaches, lack of understanding from medical staff and financial barriers. For those living with chronic conditions or permanent pathologies – affecting 20 per cent of respondents – these obstacles pose serious risks to long-term health.

⁸ See <https://aleancalgbt.org/publication/albania-under-upr-aleanca-lgbti-and-ilga-worlds-joint-submission>.

56. Intersex individuals also remain inadequately protected. While a 2020 protocol was adopted to safeguard the bodily integrity of intersex infants, it does not meet international human rights standards and fails to prohibit non-consensual, non-essential surgeries.

57. Healthcare services for people living with HIV face additional, serious challenges. Frequent shortages and delays in procuring essential antiretroviral medications – in particular pre-exposure prophylaxis and post-exposure prophylaxis– have resulted in repeated interruptions to preventive care. Viral load and resistance testing are often unavailable in public hospitals, leaving patients reliant on prohibitively expensive private clinics. Reports of people developing AIDS owing to a lack of timely care, alongside rising sexually transmitted infection rates, underscore the urgent need to strengthen public health infrastructure in this area. With support from the Global Fund to Fight AIDS, Tuberculosis and Malaria ending in December 2024, there is growing concern about how the country will fill this critical gap in prevention and treatment services, in particular given its low overall HIV prevalence but increasing risks among key populations and a rise in late-stage diagnoses.

58. Mental health is another area in which LGBT individuals face barriers to adequate care. While mental health services are available, access remains uneven, in particular for those dealing with the long-term effects of discrimination, social exclusion and trauma. LGBT activists and community leaders have raised concerns over increasing burnout within the community, in particular among those working to combat organized disinformation campaigns and anti-LGBT narratives.

59. Albania has also taken steps to address harmful practices, with the Albanian Order of Psychologists announcing a prohibition on conversion therapy in 2020. However, this restriction applies only within the psychology profession, leaving gaps in protection against such practices in other healthcare settings.

60. Albania has laid a strong foundation through its legal commitments and recent health policy reforms. By addressing these remaining gaps and ensuring the full inclusion of LGBT people in its healthcare system, Albania can build a model of equitable, inclusive and rights-based healthcare that protects and promotes the well-being of all its citizens.

D. Safety and security

61. Albania continues to face high levels of gender-based violence, although improved reporting mechanisms may contribute to higher recorded rates compared with the region. The Ministry of Health and Social Protection offers comprehensive services for survivors, including emergency shelter and psychosocial support. The partially State-funded shelter, Streha, plays a vital role in providing specialized care for LGBT individuals who have experienced violence and discrimination.

62. The State's efforts to protect LGBT people are linked closely to its broader strategies to combat gender-based and domestic violence, through coordination between the national action plan for LGBTI+ people and the national strategy for gender equality. Each municipality has a designated gender focal point tasked with advancing these objectives. Common to all victims of gender-based violence are shared experiences of stigma and discrimination rooted in rigid gender norms. As one official in Kukës noted, just as domestic violence was once considered a taboo subject, discussions of gender identity and sexual orientation have also historically been avoided in local communities.

63. Notwithstanding a strong policy framework, frontline organizations report that State funding and resources remain insufficient to meet the needs of victims and to fully implement these protections in practice.

64. A clear gap exists between the perceptions of law enforcement authorities and civil society organizations regarding the prevalence of hate crimes and hate speech against LGBT individuals in Albania. While official reports suggest few, if any, recorded incidents – with the State Police and General Prosecutor's Office reporting no hate crimes in 2023 – civil society accounts present a different picture. While violent incidents are not systemic or widespread, they occur with sufficient regularity to have a chilling effect on the public expression of identity. Transgender women and visibly active LGBT individuals appear to

be particularly at risk, with reports of violence following public displays of affection or participation in advocacy activities.

65. The General Directorate of Police has adopted a range of measures to promote inclusive, fair and effective protection, in particular for vulnerable groups. These include improving access to reporting mechanisms, enhancing police training, standardizing case documentation and strengthening cooperation with civil society. A round-the-clock free hotline and an official email address are available to report all forms of violence. Article 7 of State Police Law No. 82/2024 enshrines the principles of human rights, equality and non-discrimination, guaranteeing the right of arrested or detained individuals to submit complaints regarding their treatment. This is supported by standard procedures established through Order No. 1720 of 20 November 2023.

66. These frameworks notwithstanding, implementation remains uneven. A prevailing “don’t ask, don’t tell” attitude discourages the visibility and documentation of bias-related incidents, and victims frequently report a reluctance by police to acknowledge discriminatory motives – even in severe cases such as online death threats. This institutional hesitancy contributes to underreporting, erodes public trust and weakens accountability for bias-motivated crimes.

67. Regardless of the cause – whether underreporting, lack of proper documentation or both – the low number of official cases risks creating complacency and fostering a sense of impunity for those who commit hate crimes. This undermines efforts to protect LGBT individuals and reinforces the need for stronger, more responsive systems to identify, record and address hate-motivated violence.

68. The State Police are subject to both internal and external oversight. The Directorate of Professional Standards handles complaints and disciplinary action, while the Police Supervisory Agency functions under the Ministry of Interior. The People’s Advocate conducts unannounced visits and civil society organizations have full access to monitor police facilities under cooperation agreements. To combat discrimination and promote diversity, the State Police have aligned policies and training with international standards, including the Council of Europe’s manual on investigating hate crimes against LGBTI persons. In 2024, more than 400 students at the Security Academy received such training, and topics such as non-discrimination, community policing and diversity are integrated into annual training and promotion exams, supported by continued collaboration with the Council of Europe.

69. Albania has made meaningful strides in developing legal frameworks and services aimed at addressing violence, in particular gender-based violence, and in fostering safer environments for marginalized groups, including LGBT individuals. These advances notwithstanding, LGBT people in Albania continue to face significant risks to their safety and security, compounded by persistent discrimination, gaps in legal protections and challenges in enforcement.

70. Transgender individuals remain particularly vulnerable owing to the absence of legal gender recognition, which exposes them to heightened risks of violence, discrimination and arbitrary treatment. Without the ability to align their legal documents with their gender identity, transgender people are susceptible to mistreatment by authorities, increased vulnerability within detention facilities and difficulties in everyday interactions with public institutions. Cases of physical violence and harassment against transgender people, both online and in public spaces, remain alarmingly frequent. A trans woman expressed her frustration with the lack of legal protection: “We don’t want words; we want action”.

71. Survey data⁹ illustrate the widespread nature of these concerns. Nearly half (43 per cent) of LGBT individuals reported experiencing violence or discrimination within the past two years, with almost three quarters of those incidents linked directly to their sexual orientation or gender identity. However, 83 per cent of victims did not report those experiences to authorities, reflecting a deep mistrust in institutions and fears of secondary victimization. Indeed, examples have been documented in which police failed to respond

⁹ Ibid.

appropriately to LGBT victims, minimized the seriousness of incidents or refused to recognize the discriminatory motives behind acts of violence.

72. Hate speech, disinformation and public hostility have fuelled a climate in which violence against LGBT people is normalized or overlooked. Civil society organizations have reported an increase in targeted attacks against activists, as well as a rise in public stigma and harassment following high-profile LGBT visibility events. This environment has, at times, discouraged political support for the equal rights of LGBT people and has further isolated victims from seeking help.

73. While there is a strong legal framework to combat gender-based violence more broadly, implementation remains uneven. Coordinated referral mechanisms have been established in municipalities across the country to provide emergency responses for victims of domestic violence, and specialized services exist for women and children. However, the inclusion of LGBT individuals within these protections varies, and cases have been reported in which shelters, law enforcement and social services have failed to adequately support LGBT victims, in particular gay men and transgender individuals. While some shelters, such as Streha, offer vital support for LGBT young people and partnerships between organizations working on gender-based violence and LGBT rights are growing, coverage remains limited and resources scarce.

74. Digital violence is an emerging threat in Albania, with increasing reports of online harassment, cyberbullying and digital abuse targeting women and LGBT individuals. In some cases, such abuse has led to tragic outcomes, including suicide. To respond, the State Police launched a cybercrime reporting platform with dedicated email and phone lines and created a Facebook page for the Directorate for the Investigation of Cybercrime. A round-the-clock monitoring and analysis sector was also established to track online violations, including on the dark web, in particular those based on sexual orientation and gender identity, in cooperation with companies such as Meta and TikTok. While some initiatives – such as reporting applications and awareness campaigns – are in place, Albania still lacks the comprehensive legal frameworks and technological capacity needed to effectively combat digital violence.

75. The underreporting of violence against LGBT individuals remains a significant barrier to understanding the full extent of the problem. Many victims do not disclose their sexual orientation or gender identity when seeking protection, fearing stigma or lack of support. Consequently, official statistics fail to capture the prevalence of bias-motivated crimes, and violence against LGBT individuals is often invisible within broader data on domestic and gender-based violence. Institutional weaknesses in data collection, limited trust in police and judicial systems and the societal pressure to remain silent all contribute to this ongoing invisibility.

76. Nevertheless, positive practices do exist. For 12 consecutive years, police have ensured the safety of Tirana's annual Pride parade, which has proceeded without major incidents of violence. The State Police also collaborate with civil society organizations to monitor the situation of the LGBT communities and support anti-discrimination efforts. In 2024, they provided support during the Queer Film Marathon Tirana at the request of the Open Mind Spectrum Albania organization. These efforts have been acknowledged positively by LGBT community representatives, enhancing trust in the police.

77. Albania's commitment to combating violence and discrimination has created a strong foundation. With continued focus and collaboration among government institutions, civil society and international partners, there is an opportunity to ensure that safety, dignity and justice are extended to every member of society, including LGBT people.

E. Protection from discrimination in the workplace

78. Albania has made meaningful progress in developing a legal framework to protect LGBT individuals from discrimination in the workplace. The 2015 amendments to the Labour Code explicitly prohibit employment discrimination on the grounds of sexual orientation and gender identity, and Albania's efforts to align its legislation with European

Union standards have contributed to further strengthening anti-discrimination protections in the employment sector. In addition, initiatives such as the translation and promotion of the United Nations Guidelines on Business and Human Rights have encouraged some businesses to adopt inclusive practices. In 2023, those standards were shared with approximately 80 businesses, and more than 60 participated in discussions on addressing discrimination in the workplace. International organizations, such as the International Labour Organization, have also supported businesses in creating safer environments for LGBT employees, in particular through the implementation of the Violence and Harassment Convention, 2019 (No. 190), which Albania ratified in 2021.

79. At the local level, there are also positive examples of progress. In Korçë, municipal authorities reported offering employment services without discrimination and noted that training had been conducted to raise awareness among public service employees about LGBT issues, in particular regarding respectful language and behaviour. Employment offices, social services and police departments have benefited from similar training, helping to lay the groundwork for more inclusive service delivery.

80. Those advancements notwithstanding, significant barriers to employment persist for LGBT individuals. Civil society research has highlighted widespread discrimination that often goes unreported. While official government channels, including the Ministry of Economy, Culture and Innovation, indicate no formal complaints of employment discrimination based on sexual orientation or gender identity, this stands in sharp contrast to the experiences shared by many LGBT people. A recent civil society survey found that a significant portion of the surveyed LGBT population faced barriers to formal employment, with 40.8 per cent having never been engaged in a formal work contract. Many turn to informal employment as an alternative, with 15.6 per cent reporting participation in such work. Even among those who are employed, workplace discrimination remains a pressing issue, given that 34 per cent reported experiencing harassment and prejudice on the basis of sexual orientation or gender identity.¹⁰

81. Transgender individuals and gender-non-conforming persons face particularly acute challenges. Many struggle to secure stable employment owing to gaps in education, pervasive discrimination and social stigma. These barriers can result in economic marginalization, driving some into precarious forms of work, including sex work, as a means of survival.

82. A lack of comprehensive data on employment discrimination continues to hinder effective responses. Employment offices report no cases, and the Commissioner for Protection from Discrimination has received few formal complaints from LGBT individuals – an absence widely understood to reflect underreporting and limited trust in institutional mechanisms rather than a lack of discrimination. Notably, in one case (No. 234, dated 17 December 2021), the Commissioner found that the complainant, J.M., had been discriminated against by Fiber Group L.L.C. on the grounds of sexual orientation. In decision No. 144 (dated 21 July 2022), the Commissioner ordered the company to revise its internal complaint procedures, display the anti-discrimination law in the workplace and conduct employee training to ensure compliance with legal obligations.

83. The main obstacles appear to arise at the point of entering the labour market, with LGBT individuals facing challenges during recruitment and application processes. In some instances, limited educational opportunities further exacerbate this exclusion, making it difficult for many to compete on an equal footing within the job market.

F. Data

84. Reliable, comprehensive and disaggregated data is essential to understanding and addressing the needs of LGBT people in Albania. However, significant data gaps remain a persistent challenge, limiting the ability of State institutions and civil society to accurately

¹⁰ See <https://aleancalgbt.org/news/ongoing-challenges-highlighted-by-aleanca-lgbts-submission-for-the-annual-country-reports-on-human-rights/>.

assess the scale of discrimination, violence and inequality experienced by LGBT individuals and to monitor the implementation of national strategies.

85. A clear disparity exists between official data and the experiences reported by civil society organizations. While civil society consistently documents discrimination and violence against LGBT individuals, official statistics report few, if any, such cases. This gap is due mainly to underreporting, limited trust in authorities and inadequate mechanisms for recording incidents based on sexual orientation or gender identity. Although Albania has used a standardized computer system since 2015 to generate crime statistics in line with international standards – including data on motives such as sexual orientation – police records often lack disaggregation by motive or gender identity. This invisibility hinders effective policy responses and weakens the implementation of existing protections.

86. Currently, Albania's national statistics, census data and sectoral records do not specifically account for the LGBT population. Ministries, such as the Ministry of Economy, Culture and Innovation, have indicated that they do not collect dedicated data on LGBT persons, citing concerns that categorizing members of LGBT communities as vulnerable could reinforce stigma. Similarly, there are no available statistics on the number of LGBT individuals serving in the armed forces or public sector, apparently because many choose not to disclose their identities for fear of discrimination.

87. While Albania has established regular reporting mechanisms to monitor the implementation of its national action plans on gender equality and the rights of LGBTI people, these reports rely on fragmented data. The Ministry of Health and Social Protection compiles monitoring reports using information provided by various ministries, gender equality specialists and the State Police, but these are limited by the quality and scope of available data. Encouragingly, reporting on the implementation of national action plans is undergoing a transition from a biennial to an annual process, which may help to strengthen oversight and identify trends more effectively over time.

88. However, the lack of accurate, disaggregated data remains a major obstacle. There is no official count of transgender individuals in Albania, and while there is a general understanding of the needs of trans persons, the absence of concrete figures limits the ability to plan services and interventions effectively. Similarly, while data on protective orders and cases of domestic violence exist, they are rarely analysed through the lens of LGBT experience and therefore do not capture the specific risks faced by this population.

89. Positive steps have been taken to include LGBT issues in broader human rights reporting frameworks. For example, the Ministry of Justice incorporates information on access to justice for LGBTI individuals in its contributions to national reports submitted under international treaties such as the Convention on the Elimination of All Forms of Discrimination against Women and the Istanbul Convention. However, these efforts remain limited by the fundamental absence of systematic data collection at the national level.

90. Closing Albania's data gaps is essential not only for effective policymaking, but also for ensuring that the rights and needs of LGBT people are recognized and addressed in full. Strengthening data systems, improving coordination across ministries and fostering collaboration with civil society and international organizations will be vital to providing an accurate picture of the challenges faced and to guiding evidence-based solutions.

III. Conclusion

91. **The Independent Expert was drawn to visit Albania because of the encouraging progress made in advancing laws and policies that protect against violence and discrimination based on sexual orientation and gender identity, and he wanted to better understand how these are being implemented at both the national and local levels. The Independent Expert is deeply grateful for the thoughtful submissions received before, during and after his visit, which significantly informed his work. Throughout his time in Albania, he was impressed by the high level of engagement from both civil society and State officials, who generously shared their time and insights. He had the privilege of meeting dedicated municipal officials working with limited resources to implement**

the national action plan, as well as courageous activists who have been instrumental in challenging violence and discrimination based on sexual orientation and gender identity. He was also encouraged by the strong alliances between feminist and LGBT groups and their shared commitment to addressing gender-based violence in all its forms.

92. LGBT people continue to face discrimination across key sectors such as education, healthcare and employment, along with persistent barriers in reporting bias-motivated crimes and seeking justice. Much of this discrimination stems from deeply rooted social attitudes, which, as noted by Ministry of Health and Social Protection officials, will take time and sustained effort to change. However, Albania's strong legal and policy framework – together with anticipated reforms such as legal gender recognition and protections for same-sex partnerships – provides a strong foundation to drive forward the lasting and meaningful change that is so clearly needed.

IV. Recommendations

1. Institutional, policy and legal framework

93. The Independent Expert recommends that the Office of the Prime Minister:

- (a) Encourage strong and consistent public condemnation of hate speech and violence by political leaders and public authorities;
- (b) Foster greater collaboration among government, civil society and international partners to build a safe and inclusive environment for all.

94. The Independent Expert recommends that the Ministry of Justice:

- (a) Establish an administrative legal gender recognition process that is simple, affordable and based on self-identification;
- (b) Legally recognize same-sex partnerships and extend equal parenting rights to same-sex couples;
- (c) In the drafting of the new Criminal Code, strengthen protections against hate crimes based on sexual orientation and gender identity;
- (d) Adopt comprehensive anti-violence legislation that explicitly addresses online and digital forms of violence, including cyberbullying and hate speech.

2. Health and social protection and services

95. The Independent Expert recommends that the Ministry of Health and Social Protection (responsible for implementing the national action plan):

- (a) Prioritize the full and well-resourced implementation of the national action plan for LGBTI+ people (2021–2027), with robust monitoring and accountability mechanisms;
- (b) Conduct regular evaluations of the Government's progress in implementing the national action plan, with input from LGBT communities;
- (c) Foster ongoing collaboration among government bodies, civil society and international partners to support implementation efforts;
- (d) Increase State funding for anti-discrimination measures and social services, reducing the reliance on external donors;
- (e) Expand and strengthen specialized support services for LGBT victims of violence, including safe shelters, legal aid and psychological support;
- (f) Secure stable and adequate funding for shelters such as Streha and other housing initiatives, ensuring protection from political interference.

3. Right to housing

96. The Independent Expert recommends that the Ministry of Economy, Culture and Innovation (responsible for the National Housing Authority):

- (a) Adopt the bylaws necessary to ensure the consistent and effective application of legal protections from discrimination in the housing sector;
- (b) Enhance privacy protections and refine the social housing scoring system to better support LGBT applicants;
- (c) Strengthen anonymity and confidentiality in housing application processes to prevent the involuntary disclosure of LGBT identities;
- (d) Adjust the social housing scoring system to account for the specific vulnerabilities and risks faced by LGBT individuals, in particular transgender persons;
- (e) Ensure equal access to housing programmes through collaboration with municipalities;
- (f) Advance the development of specialized housing for marginalized groups, including LGBT persons, with clear timelines and dedicated resources;
- (h) Increase outreach to LGBT organizations to identify community members in need of housing support and connect them with services;
- (i) Enhance collaboration among municipalities, non-governmental organizations and LGBT communities through training programmes, workshops and knowledge-sharing initiatives to improve service delivery and inclusive housing access.

4. Protection from discrimination in the workplace

97. The Independent Expert recommends that the Ministry of Economy, Culture and Innovation:

- (a) Strengthen inclusive employment practices to ensure equal opportunities for LGBT individuals;
- (b) Expand public education campaigns to combat workplace stigma and raise awareness of the equal rights of LGBT people in employment;
- (c) Foster ongoing collaboration among government institutions, civil society organizations and the private sector to promote inclusive and welcoming work environments;
- (d) Ensure that legal protections against employment discrimination are matched by practical measures to support access, retention and advancement for LGBT employees;
- (e) Strengthen enforcement of anti-discrimination laws in the workplace;
- (f) Promote inclusive employment policies, including affirmative action, and reasonable accommodations to improve LGBT access to formal employment.

5. Right to education

98. The Independent Expert recommends that the Ministry of Education, Sport and Youth:

- (a) Revise school curricula to include accurate, age-appropriate information on sexual orientation, gender identity and LGBT people's human rights, including as recognized under Albania's law and policy framework;
- (b) Expand comprehensive sexuality education to incorporate LGBT topics;

- (c) **Implement mandatory training for teachers and school staff on supporting LGBT students and fostering inclusive school environments;**
- (d) **Ensure that educators are equipped to support LGBT students and foster inclusive school environments;**
- (e) **Implement comprehensive anti-bullying programmes;**
- (f) **Strengthen monitoring and reporting mechanisms to identify, address and prevent discrimination in schools;**
- (g) **Guarantee safe and inclusive learning environments for all students, regardless of sexual orientation or gender identity;**
- (h) **Launch public awareness campaigns to promote understanding of anti-discrimination laws and the role of the Commissioner for Protection from Discrimination;**
- (i) **Invest in long-term public education initiatives to counter violence and discrimination, starting with the education system but extending beyond it;**
- (j) **Promote cooperation among national institutions, municipalities and civil society to ensure coordinated and sustainable progress in creating safe and inclusive schools;**
- (k) **Integrate accurate and age-appropriate information on LGBT identities and rights into school curricula.**

6. Right to health

99. **The Independent Expert recommends that the Ministry of Health and Social Protection:**

- (a) **Finalize and implement a national medical protocol for hormone therapy for transgender individuals;**
- (b) **Develop and adopt legal gender recognition procedures to align identity documents with individuals' gender identities, including to promote mental health and facilitate access to healthcare without undue obstacles;**
- (c) **Expand public health insurance coverage to include gender-affirming care, such as hormone therapy and surgical options;**
- (d) **Improve access to affordable HIV treatment and testing, including viral load and resistance testing;**
- (e) **Ensure stable, long-term funding for HIV prevention and treatment programmes;**
- (f) **Integrate mandatory training on LGBT health needs into all professional development programmes for healthcare providers;**
- (g) **Strengthen anti-discrimination measures to guarantee safe, respectful and dignified care for LGBT individuals;**
- (h) **Finalize and implement healthcare protocols to ensure non-discriminatory, culturally competent care;**
- (i) **Launch public awareness campaigns to combat stigma and misinformation around LGBT health.**

7. Safety and security

100. The Independent Expert recommends that the General Prosecutor's Office:

- (a) Invest in regular and mandatory training for law enforcement, judiciary officials and service providers to ensure that bias-motivated violence is properly identified, recorded and prosecuted;
- (b) Increase the capacity of law enforcement and judicial institutions to effectively address violence based on sexual orientation and gender identity;
- (c) Regulate and address online violence, including cyberbullying and digital harassment.

101. The Independent Expert recommends that the State Police:

- (a) Strengthen systems for reporting, documenting and investigating bias-motivated crimes to ensure that they are accessible, effective and responsive to all who need protection;
- (b) Improve data-collection systems to accurately track incidents of violence and discrimination based on sexual orientation and gender identity.

8. Data gaps

102. The Independent Expert recommends that all ministries:

- (a) Invest in stronger, coordinated data-collection systems to accurately capture information on LGBT individuals and their needs;
- (b) Conduct baseline studies to assess the specific needs of LGBT communities, with a focus on informing the implementation and evaluation of national action plans;
- (c) Allocate dedicated resources to ensure the systematic collection of high-quality, disaggregated data on vulnerable groups, including LGBT people;
- (d) Provide targeted training for frontline professionals – including family doctors, social workers and police – on issues related to sexual orientation and gender identity to improve the accuracy and consistency of data collection;
- (e) Strengthen data collection related to gender-based violence to ensure that cases based on sexual orientation or gender identity are properly identified, recorded and addressed;
- (f) Foster collaboration among government institutions, civil society and international partners to support sustainable and transparent data systems.