

Comments of the Government of the Republic of Armenia on the “Memorandum on Violence against Women in Armenia” by the Council of Europe Commissioner for Human Rights

The Government of the Republic of Armenia expresses its sincere gratitude to the Council of Europe Commissioner for Human Rights, Mr Michael O’Flaherty, for the “Memorandum on violence against women in Armenia”, prepared following his visit to Armenia from 3 to 5 February 2026.

Armenia attaches great importance to its cooperation with the Office of the Commissioner for Human Rights and highly values the Commissioner’s continued attention to the country’s democratic reform agenda, including in the areas of human rights protection, equality, access to justice and the prevention of violence against women and domestic violence.

The visit of the Commissioner to Armenia provided an important opportunity for open and substantive dialogue with the competent Armenian authorities, national institutions and other relevant stakeholders. The Government of the Republic of Armenia appreciates the Commissioner’s engagement and the constructive manner in which the issues covered by the Memorandum were discussed.

The Government welcomes the Commissioner’s acknowledgement of the progress made by Armenia in countering violence against women. At the same time, the Government considers that the Memorandum would benefit from a more inclusive reflection of the positive developments and wide-ranging reforms undertaken in recent years, which are important for presenting a comprehensive picture of the situation in this field.

Armenia takes careful note of the observations and recommendations aimed at addressing the remaining challenges in this field and at further aligning Armenia’s policies, legislation and institutional practice with relevant Council of Europe standards.

The Government of the Republic of Armenia remains firmly committed to strengthening the national framework for the prevention of and response to violence against women, ensuring effective protection and support for victims, promoting accountability, and further developing coordinated action among all relevant public institutions.

The recommendations contained in the Memorandum will be given due and proper attention by the competent Armenian authorities as Armenia stands ready to continue its constructive dialogue and cooperation with the Commissioner for Human Rights and the Council of Europe

with a view to further advancing the protection of women's rights and strengthening the effectiveness of national policies and practices in this area.

In this spirit, the competent authorities of the Republic of Armenia provide below their comments on the issues falling within their respective mandates, including information on ongoing reforms, recent developments and planned measures in the areas addressed in the Memorandum.

In relation to paragraph 14 of the Memorandum (Shelters and Support Centers):

State funding for shelters has been made available from the very beginning of the process, reflecting the Government's commitment to ensuring the availability of essential support services for victims of domestic violence. (See also comments under paragraphs 30-31).

In relation to paragraphs 19-23 of the Memorandum (Police and Court Protection Response):

The Ministry of Internal Affairs is undertaking targeted measures within the framework of the Police Reform Strategy and the 2024–2026 Action Plan, the 2024–2028 Strategy and Action Plan for the Implementation of Gender Policy in the Republic of Armenia, the Comprehensive Programme on the Protection of the Rights of the Child for 2024–2029, the 2025-2027 National Action Plan of the Republic of Armenia for the Implementation of the Provisions of United Nations Security Council Resolution 1325 on Women, Peace and Security, as well as a number of other strategic policy documents.

A key role in the prevention and combating of trafficking in persons, domestic violence and gender-based violence is carried out by the Police of the Ministry of Internal Affairs, whose respective units undertake the necessary measures to ensure the proper documentation of reported cases, the collection of the requisite evidentiary basis and the safety and protection of victims of violence. Activities in this field are carried out through victim-centred and gender-sensitive approaches. In all work involving children, the presence of a psychologist or pedagogue is ensured, and due consideration is given to the minor's biological, psychological, social, age-related and gender-specific characteristics. In all actions concerning children, primary importance is attached to safeguarding the best interests of the child.

Within the framework of the "16 Days of Activism Against Gender-Based Violence" campaign launched in 2025, the Ministry of Internal Affairs implemented various measures aimed at ensuring the effective application of protection and rehabilitation mechanisms for victims of

violence, as well as at raising public awareness and fostering a culture of zero tolerance towards gender-based discrimination.

The Ministry of Internal Affairs is consistently undertaking measures aimed at strengthening the professional knowledge and skills of employees of the relevant police subdivisions in the fields of prevention and combating of domestic and gender-based violence, trafficking in persons and discrimination, including through the provision of continuous training. A procedure for the training of competent police officers in the field of prevention of domestic and gender-based violence and protection of victims of such violence has been developed. Within the framework of measures aimed at strengthening and enhancing the professional capacities of relevant police officers of the Ministry of Internal Affairs, the Police of the Ministry of Internal Affairs cooperate with the United Nations Population Fund, the Council of Europe Office in Yerevan, as well as with relevant state bodies and non-governmental organizations. In this context, training courses have been organised for competent police officers. The delivery of such training programmes is of a continuous nature.

In order to further enhance police officers' skills in the proper response to cases of violence against women and domestic violence, the Police of the Ministry of Internal Affairs, in cooperation with the Council of Europe Office in Yerevan, has developed the manual entitled "Police Response to Domestic Violence". Within the framework of the implementation of the provisions of the Convention on preventing and combating violence against women and domestic violence, the Council of Europe Office in Yerevan has organised training courses for police officers, including both operational staff and members of the managerial level.

In relation to Paragraph 23 and Recommendation 3:

The Criminal Code of the Republic of Armenia already establishes criminal liability for non-compliance with an emergency intervention order or a protection order (Article 508).

In relation to Paragraph 23 and Recommendation 4:

The new Criminal Procedure Code (adopted in 2021) has introduced mechanisms to reduce possible risks of re-victimization of persons belonging to certain vulnerable groups. Namely, according to the Code, an investigative action with the participation of a minor, an incapacitated person or a person who has mental health issues are performed with the involvement of a

psychologist, qualified in accordance with the procedure established by the Government. The qualification of psychologists is conducted periodically and is led by the Ministry of Justice.

Besides, two "BARNAHUS"-model centres have been founded in Armenia to further ensure the protection of the rights of children involved. Legislative amendments are underway to also ensure that child victims are, as a rule, interviewed once during the proceedings.

In relation to Paragraph 23 and Recommendation 5:

Training programs for judges, prosecutors and investigators regularly include the topics of VAW and domestic violence. During 2025 alone, the following professionals participated in the Academy of Justice training course entitled "Preventing and Combating Violence Against Women and Domestic Violence in Armenia":

- 73 judges and judicial candidates;
- 52 prosecutors;
- 76 investigators.

In relation to Paragraph 23 and Recommendation 7:

The Law of the Republic of Armenia "On Advocacy" states that public defense (state-funded free legal assistance) is provided, inter alia, to persons subjected to domestic violence in accordance with the legislation on domestic violence.

In relation to paragraph 24 of the Memorandum (Police Warnings):

In cases of domestic and family violence, competent police officers conduct a risk assessment of the situation and, based on the results of that assessment, determines and applies the appropriate protective measure.

Pursuant to Article 6(1) of the Law of the Republic of Armenia "On the Prevention of Domestic and Family Violence and the Protection of Persons Subjected to Domestic and Family Violence," a warning is issued in cases where the incident of domestic and family violence has occurred for the first time, there are no reasonable grounds to assume an immediate risk of repetition or continuation of the violence, and there are no grounds requiring urgent intervention. Consequently, a warning is applied in situations where the life or health of the person subjected to violence is not under immediate threat and no grounds exist for urgent intervention.

At present, authorized officers of the Police of the Ministry of Internal Affairs, when handling cases of domestic and family violence, act in accordance with the applicable legislation and within the scope of the powers vested in them.

In relation to paragraph 25 of the Memorandum (Perpetrator Accountability):

The Criminal Code of the Republic of Armenia criminalizes a wide range of offences of varying gravity, covering different forms of conduct - from social isolation to stalking.

Furthermore, the Criminal Procedure Code establishes four general grounds for initiating criminal proceedings. In particular, pursuant to Article 173(1) of the Criminal Procedure Code of the Republic of Armenia:

“1. Within the scope of his or her competence, the investigator shall be obliged to initiate criminal proceedings if a proper report on an apparent crime has been received from:

- a natural person;
- a legal person;
- a state or local self-government body or an official thereof, in connection with the performance of their functions;
- a body conducting operative-intelligence activities, an investigator, prosecutor or judge, in connection with the exercise of their powers.”

In addition, during pre-trial proceedings, if the supervising prosecutor discovers indications of an apparent crime, he or she shall immediately instruct the investigator to initiate criminal proceedings and commence a preliminary investigation. Where it is necessary to correct the factual description of the alleged offence or its legal qualification, amendments shall be made to the record on the initiation of criminal proceedings.

Moreover, pursuant to Article 11 of Code, in cases involving offences with elements of domestic violence, criminal prosecution is conducted upon the initiative of the prosecutor, irrespective of whether a criminal complaint has been filed or withdrawn.

Activities aimed at improving the legislative framework:

In recent years, positive practices have been developed and legislative improvements introduced on the basis of practical experience, which merit due acknowledgment.

Article 71 of the Criminal Code of the Republic of Armenia, which entered into force on 1 July 2022, establishes as an aggravating circumstance for criminal liability or punishment the commission of a crime motivated by hatred, intolerance, or hostility based on racial, national, ethnic or social origin, religion, sex, political or other views, or other personal or social characteristics.

In the Republic of Armenia, continuous steps are being taken to improve the protection process for individuals subjected to discrimination, trafficking, domestic and gender-based violence, to develop necessary legal mechanisms and procedures, to map systemic gaps and to enhance early response mechanisms.

- On 20 February 2025, Government Decision No. 181-N was adopted, approving the Procedure for the Detection of Domestic Violence Cases, Referral of Victims of Domestic Violence and Risk Assessment of Repetition of Domestic Violence Incidents.
- In order to improve the effectiveness of combating domestic and gender-based violence, Order No. 93-L of the Minister of Internal Affairs of 22 December 2025 approved the forms of decisions on the application of warning and emergency intervention measures against perpetrators of domestic violence.
- By order of the Minister of Internal Affairs, the Procedure for Monitoring the Prevention of Domestic Violence Committed by Minors within the Framework of Preventive Registration Carried out by the Police of the Ministry of Internal Affairs of the Republic of Armenia was established.
- In order to establish safety protocols for working with victims of domestic and gender-based violence, including procedures for their relocation to shelters, as well as to define standard operating procedures for police officers in relation to the most common reports and cases of domestic violence, a legislative amendment has been initiated by the Ministry of Internal Affairs.
- In the context of ensuring the safety of victims of domestic and gender-based violence, a draft law “On Amendments and Additions to the Criminal Code of the Republic of Armenia” has been developed, proposing the introduction of liability for perpetrators of domestic violence who evade or refuse to comply with electronic monitoring measures.

In parallel, amendments have been introduced to the Law “On Prevention of Domestic and Gender-Based Violence and Protection of Victims of Domestic and Gender-Based Violence” (13 November 2025, Law No. HO-384-N), according to which a perpetrator of violence is obliged to wear an electronic monitoring device used to ensure compliance with emergency intervention or protective orders. Failure to wear or refusal to use the electronic monitoring device entails liability prescribed by law.

In relation to Paragraph 26 and Recommendation 6:

A number of regulations have already been introduced into the Criminal Code of the Republic of Armenia, making it in line with the Istanbul Convention, and in all relevant provisions the commission of the act by a close relative, partner or former partner has been established as an aggravating circumstance.

In this regard, acts of domestic violence are already addressed through the existing provisions of the Criminal Code in a comprehensive manner. The Armenian authorities therefore consider that the current legal framework provides an adequate basis for addressing such acts without the need to establish a separate offence of domestic violence.

In relation to Paragraph 28 and Recommendation 12:

The basis for this concept has already been enshrined in the Criminal Code of the Republic of Armenia. Namely, the Code envisages that each year the State may implement social programmes aimed at compensating the victims for the damage caused by the crime, at the expense of the means generated in the State Budget through the application of fine. The principles, priorities of, procedure for and amount of compensation of the damage caused to victims by the crime are prescribed by the Government.

In relation to paragraphs 30-31 of the Memorandum (Shelters and Support Centers) and Recommendation 9:

Since 2020, the Ministry of Labor and Social Affairs of the Republic of Armenia has launched support center and shelter services for victims of domestic and family violence, funded through the state budget of the Republic of Armenia. The financial resources allocated for the provision

of these services have increased year by year, making it possible to expand the types of support available to victims of domestic and family violence. Currently, the state allocates approximately 114 million AMD to support centers and shelters for victims of domestic and family violence. Since 2023, the support centers have also begun implementing an economic empowerment program for women subjected to domestic violence, aimed at promoting the financial independence of women subjected to violence, supporting independent living, and encouraging their economic activation.

In 2025, the amount of state funding allocated for shelter services for victims of domestic and family violence was also increased. As a result, since 2026, three shelters for victims of domestic and family violence have been operating in the Republic of Armenia. The new shelter is intended for women who have children under their care.

The Government allocates 15 million AMD for one-time financial assistance to victims of domestic violence. In 2024, the legal framework for the provision of financial assistance was revised, resulting in a significant increase in the amount allocated per beneficiary. The assistance is provided based on assessed need, taking into account the interests of persons under the victim's care, such as children, older persons, or persons with disabilities. The purpose of the one-time financial assistance is to address the urgent needs of a person who has been subjected to violence.

In addition, the Government decision defining the procedure, conditions, and beneficiary groups for providing accommodation in the social housing fund within the framework of state social assistance programs is currently being amended. As a result of this change, individuals who have been subjected to domestic violence are defined as a target group and are eligible to benefit from the social housing program on the basis of the needs assessment conclusion issued by a social worker at a support center or shelter, and upon meeting the established criteria.

The Law of the Republic of Armenia "On the Prevention of Family and Domestic Violence and the Protection of Persons Subjected to Family and Domestic Violence," and the sub-legislative legal acts deriving from the Law (Decision No. 158-N of the Government of the Republic of Armenia dated 13 February 2025 and Decision No. 364-N of the Government of the Republic of Armenia dated 29 March 2019), clearly define the operational procedures of support centers and shelters for persons subjected to family and domestic violence, along with the key requirements and standards applicable to service-providing personnel. It should be emphasized that both support centers and shelters are required to be adapted and accessible to the needs

of persons with disabilities. The provision of information and communication with the person subjected to violence must be carried out in a language understandable to them and, in the case of persons with disabilities, in an accessible manner appropriate to their needs.

As a result of compliance with the above-mentioned requirements, as well as a number of other standards established for the provision of social services, all support centers and shelters providing such services are certified by the Authorized Body, the Ministry of Labor and Social Affairs of the Republic of Armenia.

In relation to paragraph 34 of the Memorandum (Helplines and Legal Aid):

In order to ensure a more rapid response to cases of domestic and gender-based violence, the "SAFE YOU" online safety mobile application has been introduced at the Police Operational Management Centre within the framework of cooperation between the United Nations Population Fund and the Police. The application, once downloaded onto a mobile phone, enables victims of violence to quickly alert the police through the "Call" button and receive appropriate assistance. Established with the involvement of civil society partners, this platform is unique in the region and constitutes an extremely important mechanism for the prevention of violence, as it allows victims to transmit emergency signals to the police operatively, thereby ensuring a faster response. The application also includes a concealment feature on mobile devices, preventing perpetrators from identifying the purpose of the application even if they gain access to the phone. The application is also used in other countries, including Moldova.

With a view to raising public awareness, the Public Communication and Awareness Department of the Ministry of Internal Affairs has broadcast thematic programmes addressing the phenomenon of domestic and gender-based violence. For the purpose of public awareness-raising, the official website of the Police publishes legal acts defining the functions of the competent police units operating in the field of prevention of domestic and gender-based violence. At the same time, information corners have been established within police subdivisions, containing information on non-governmental organisations and support centres operating in the Republic of Armenia in the field of prevention of domestic and gender-based violence, hotline telephone numbers, literature relating to domestic and gender-based violence, as well as informational leaflets and posters of the "SAFE YOU" application.

In relation to paragraph 34 of the Memorandum (Helplines and Legal Aid) and Recommendation 10:

The support centers for persons subjected to family and domestic violence also provide a “Hotline” service, the purpose of which is to offer primary consultation and referral to victims of violence. Currently, the hotline of the support center in Yerevan operates 24/7. Therefore, the Ministry of Labor and Social Affairs, in cooperation with the World Bank, has initiated work on establishing a nationwide, free and round-the-clock hotline for cases of family and domestic violence across the entire territory of the Republic of Armenia. The new hotline system will handle initial calls related to domestic violence cases and is intended to improve the efficiency and accessibility of services provided to victims of domestic violence. The implementation of the hotline system will take place in two phases: establishing the legal framework (development and adoption of necessary legislative regulations, development and approval of a communication strategy, staff training, and setting security standards) and the introduction of a digital system. The system will be implemented in close cooperation and with the active involvement of non-governmental organizations providing specialized services to victims of family and domestic violence, independent experts and other stakeholders.

In relation to paragraphs 36-37 of the Memorandum (Coordination and Data Gathering) and Recommendation 11:

Emphasizing close and effective cooperation between state and public bodies in the framework of the prevention of and response to family and domestic violence, the Council for the Prevention of Family and Domestic Violence has been established and has been operating in the Republic of Armenia since 2018. As a result of legislative amendments that entered into force on 1 July 2024, the composition of the Council was also changed, expanding the range of non-governmental organizations to include those working in the fields of children’s rights, elderly issues, and the rights of persons with disabilities. The Council holds annual meetings in accordance with the established procedure to discuss existing issues in the sector, present new legislative initiatives, and provide updates on ongoing programs and measures.

Within the framework of ensuring gender equality and combating violence against women, the Council and the working group attached to it are also of particular importance. The Council is chaired by the Deputy Prime Minister of the Republic of Armenia. It oversees the impact of state policies on gender equality, women’s empowerment, the expansion of opportunities, the reduction of discrimination, and the prevention of gender-based violence across various spheres of public life. The Council is composed of representatives from relevant ministries and agencies, as well as civil society organizations working in this field. The Council may establish temporary thematic groups to address specific or urgent issues concerning equal rights and opportunities

for women and men, with the participation of independent experts, representatives of the business community, and international and non-governmental organizations.

In addition, the Gender Thematic Group, co-chaired by the Ministry of Labor and Social Affairs, UN Women, and the Council of Europe, is actively engaged in its activities. Within the framework of the Gender Thematic Group, a Gender-Based Violence Prevention Sub-Working Group has also been established. The activities of all these working groups are aimed at strengthening intersectoral cooperation, developing and implementing common approaches in policies related to the prevention of violence against women and domestic violence, and promoting gender equality.

The Ministry of Labor and Social Affairs coordinates and ensures the annual planned meetings of all the above-mentioned working groups. The meetings are publicly reported on the official websites of the Ministry of Labor and Social Affairs.

In order to ensure cooperation and continuous communication with relevant state bodies and non-governmental organizations in the field of prevention of domestic and gender-based violence, as well as to enable prompt response to existing challenges and the development of effective solutions, an Interagency Working Group on Promoting Rapid Response to Domestic and Gender-Based Violence Cases was also established by Order No. 247-A of the Minister of Internal Affairs of 17 January 2025.

The Centralized Accounting System for Cases of Family and Domestic Violence, launched on January 1, 2025, enables the collection of comprehensive, detailed, and disaggregated statistical data on cases of family and domestic violence from the Ministry of Internal Affairs Police, the Investigative Committee, the Judicial Department, support centers, and shelters. In 2025, 2,905 cases of family and domestic violence were entered into the system. 282 user accounts were registered in the system, of which 205 were active user accounts, meaning they continuously entered data and reported the work carried out in each case. The Ministry of Labor and Social Affairs, in cooperation with all bodies included in the System, is developing reporting formats for cases of family and domestic violence according to the activities and mandates of each institution. Currently, a digital tool for the automatic generation and submission of reports is being introduced into the System, which will ensure data interoperability, reliability and transparency.

The System provides not only quantitative but also qualitative data on cases of family and domestic violence, including information such as the education or employment status of the persons involved in domestic violence cases, their mental health condition, whether they have a disability or not, whether they have dependencies on psychotropic/psychoactive substances, and a number of other data points. The availability of such disaggregated data makes it possible not only to improve policies for combating family and domestic violence, but also to implement targeted and needs-based interventions in related sectors.

The Ministry of Labor and Social Affairs ensures the regular submission of comprehensive reports on cases of domestic violence. In 2025, the summary report was published on the official website of the Ministry - <https://www.mlsa.am/Programs-And-Services/159>.

In relation to paragraphs 38-42 of the Memorandum (Ratification of the Istanbul Convention) and Recommendation 1:

The Gender Policy Implementation Strategy of the Republic of Armenia for 2025–2028 has set out clear measures regarding the Istanbul Convention. These measures are aimed at conducting relevant research and studies on the Convention, as well as overcoming stereotypes existing in society. The work carried out in this framework is presented in detail in the 2025 annual report of the Strategy- <https://www.mlsa.am/Programs-And-Services/161> .The report was submitted for discussion to all interested stakeholders, including state bodies, civil society organizations, and independent experts (the draft report was discussed within the Gender Thematic Group and subsequently at the Women’s Council).

It is also important to note that, as of January 1, 2026, Armenia has launched for the first time a program for working with perpetrators of domestic and household violence, in line with Article 16 of the Istanbul Convention. Within the framework of this program, the Ministry is closely cooperating with the Council of Europe Office in Yerevan. In cooperation with the Council of Europe, the training curriculum and manual for professionals implementing the program are currently being developed. The first phase of professional training will be conducted from June 8 to 12 by a Council of Europe expert.

In relation to paragraph 41 of the Memorandum (Ratification of the Istanbul Convention) and Recommendation 2:

The Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence was incorporated into the professional capacity-building programs organized in 2025 within the framework of combating domestic and family violence through the cooperation between the Ministry of Labor and Social Affairs of the Republic of Armenia and the Council of Europe Office in Yerevan.

These programs included:

- Three workshops on the “Program for Perpetrators of Domestic and Family Violence,” implemented for the first time in Armenia, attended by 87 professionals from state institutions and civil society organizations. During these workshops, an international expert provided a detailed presentation on the international legal framework governing domestic and family violence prevention and response, prevention mechanisms, and specific approaches and special measures for working with victims and perpetrators of domestic and family violence, in line with Article 16 of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence.
- A training on technology-facilitated violence against women, attended by 31 professionals from state institutions, media organizations, law enforcement bodies, and civil society organizations.
- A study visit to the Federal Republic of Germany, during which 13 participants from state institutions and civil society organizations familiarized themselves with intervention programs for perpetrators of domestic and family violence, support programs for victims, violence prevention and rapid response mechanisms, interagency cooperation practices, and the standards established by the Council of Europe for implementing such programs.

Throughout all of the above-mentioned activities, the provisions of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence were addressed, with efforts focused on identifying and addressing misconceptions and misinformation surrounding the Convention, as well as providing a more detailed presentation of its key objectives and purposes.

The Ministry of Justice periodically carries out awareness raising activities in the overall framework of fighting discrimination and promoting tolerance. It should also be mentioned that in the period of signing the Convention, relevant activities were also conducted including in the

form of a “myths vs reality” publication.