

Fundamental Rights Platform consultations

CONSULTATION ON FRA'S ANNUAL REPORT Fundamental Rights: challenges and achievements in 2011

CONSULTATION PERIOD: 21 June – 14 September 2012

PARTICIPANTS: Organisations participating in the Fundamental Rights Platform (FRP)

NUMBER OF RESPONSES: 64 organisations¹

TYPE: Online consultation

FOLLOW-UP: Meaningful elaboration of comments by FRP organisations that responded to the consultation was an opportunity for the FRP Project Team, in close coordination with relevant FRA Project Managers, to provide feedback to each organisation. The summary of all contributions will be presented to the FRA Management Board and will feed into preparations of the next Annual Report.

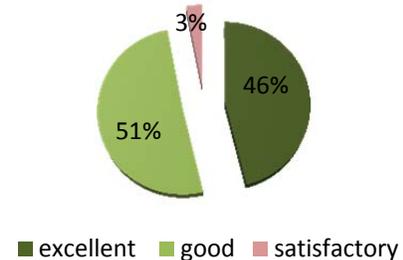
SUMMARY OF MAIN RESULTS:

I. The overall quality of the report

FRP participants continue to appreciate the Annual Report, both for its content, as well as format and structure. 93% of all respondents assessed the overall quality of the Annual Report 2011 good (51%) or excellent (42%).

“Excellent that this information is all in one place and so accessible” (European Council on Refugees and Exiles, ECRE).

Overall quality of the Report



II. Thematic areas

This year respondents were asked to provide feedback only in relation to those chapters of the Report that are relevant for their work, following suggestions from FRP participants on how to improve the consultation questionnaire.

Most respondents (78%) considered Chapter 5: Equality and non-discrimination to be relevant for their work, which quite accurately reflects the composition of the Fundamental Rights Platform. A high

¹ Compared to consultation on the Annual Report in 2010, the number of respondents increased from 25 to 64 organisations

number of responses refer to Chapter 6 'Racism and ethnic discrimination' (42.65%) and chapter 1 'Asylum, immigration and integration' (37%). Information society and data protection (12.5% (Chapter 3) were relevant for the work of only few respondents.

For specific comments and issues raised in respect to each chapter, please see Annex II.

III. Quality and relevance of selected chapters

FRP participants were asked to assess the quality of selected chapter(s) in terms of accuracy, readability and layout. Over 80% of all respondents assessed accuracy and readability of all chapters as excellent or good. Layout similarly scored highly (more than 90% of respondents referred as good or excellent) with the exception of chapter 7 'Participation of EU citizens in the Union's democratic functioning' which layout was considered satisfactory for 35% of respondents.

IV. How are you going to use the results of the report in your work?

The 2011 Annual Report is considered a very useful reference for analysis and research (48%) as well as for the identification of key issues (32%) in the field of Fundamental rights. Most organisations stressed the usefulness of the Annual Report's results for their advocacy and lobbying activities (78%). To a lesser extent FRP participants will be using the report for information and legal activities.

V. ANNUAL REPORT 2012: Please identify important issues that should be reflected in the next Annual Report:

A number of issues were suggested for the 2012 Annual Report. These include:

- Address the 'Growing impact of the current global economic crisis on the fundamental rights.' (Marangopoulos Foundation for Human Rights);
- 'We believe that greater reference should be made to persistent and extreme poverty and social exclusion.' (International Federation of Social Workers);
- Give 'more weight' to the topic of juvenile justice (International Juvenile Observatory);
- Pay 'attention at the new obligations created by the Victims' Rights Directive to be adopted later in 2012, as regards victims of bias-motivated crimes' (ILGA Europe);
- 'La possibilité d'accéder directement aux différents chapitres est une bonne pratique qui permet un accès rapide à l'information. Il serait en outre utile d'inclure un index des sections de chaque chapitre au début de ceux-ci pour faciliter la lecture aux personnes qui lisent les chapitres isolément' (Forum réfugiés - Cosi);
- 'In our view there are various elements of weakness, concerning an excessive length of the document, a too wide 'encyclopaedic' approach, the lack of cross-sections' (Centro di eccellenza Altiero Spinelli - CeAS);

An extensive list of all suggestions is included in Annex II of the report.

FRP participants continuously stress the importance of social and economic rights. However, FRA work, and by extension the Annual Report, is restricted to the areas of agency's Multi-Annual Framework, which currently does not include social and economic rights.

VI. Which areas should the Annual Report cover more in depth?

55% of respondents suggest that the Annual Report should more extensively cover the analysis of national developments as well as the identification of promising practices. 49% consider the analysis of EU developments could be more in depth.

VII. How could the Annual Report be put to better use?

What could be done by your organisation?

FRP participants expressed a lot of support for the agency's work. They offered to help the Annual Report by providing data and expertise on national developments, by supporting awareness raising and dissemination efforts through online means of communication, their own events, and circulating it to their partners and stakeholders. Some respondents also offered to help with translating the report into other EU languages.

What could be done by the Fundamental Rights Platform?

- 'With the guidance and involvement of the FRA, Platform member organisations could develop local/national level projects and activities' (Centro di eccellenza Altiero Spinelli);
- 'FRP could establish country groups and thus provide assistance to FRA in data collection from the national levels.' (Federation of Western Thrace Turks in Europe);
- 'The FRP could discuss to a greater extent the needs on the content of the report. A session of the FRP annual meeting should be devoted to that.' (Helsinki Foundation for Human Rights);
- 'Fundamental Rights Platform could create different sections of working involving for each area all the competent NGO's involved' (LAW, Legal Aid Worldwide);
- 'Share the feedback – beyond the summary – of other FRP organisations' (Yad Vashem)

The comments above, and others received, demonstrate the interest of civil society organisations to be more actively involved in FRA thematic projects.

What could be done by FRA?

Respondents stressed the importance of FRA investing in disseminating the report, including by, for example, having a 'short video version' of the report (Mental Health Europe) or co-organising national events for presenting the main findings (Centre for the Study of Democracy). It was also suggested that FRA should continue consulting the FRP on the Annual Report: 'although there are quite a few evaluations sent round by FRA, in this case it has been very useful' (European Council on Refugees and Exiles).

ANNEX I: LIST OF RESPONDENTS

1. Alliance Defense Fund (ADF)
2. ANTIGONE
3. Association des femmes de l'europe Méridionale (AFEM)
4. Avvocatura per i Diritti LGBTI-Rete Lenford
5. Bretagne Réunie
6. Bulgarian Lawyers for Human Rights Foundation
7. Businesswomen Organisation of Lithuanian Ethnic Groups
8. Center for the Study of Democracy
9. Centro di eccellenza Altiero Spinelli (CeAS)
10. Comité Espanol de Representantes de Personas con Discapacidad (CERMI)
11. Comitato per la promozione e protezione dei diritti umani
12. Community Security Trust
13. Conference of INGOS of the Council of Europe
14. Coordination des associations et des particuliers CAP Liberté de conscience (COORDIAP)
15. Centre for Science, Society and Citizenship (CSSC)
16. Department of Political Science, Dispo - University of Genoa
17. Hellenic Foundation for European Foreign Policy (ELIAMEP)
18. European Network of (ex) Users and Survivors of Psychiatry (ENUSP)
19. Estonian Patient Advocacy Association
20. EUROMIL
21. European Academy EURAC - Institute for Minority Rights
22. European Centre of the International Council of Women (ECICW)
23. European Council on Refugees and Exiles (ECRE)
24. European Jewish Congress
25. European Muslim Union
26. European Network on Independent Living
27. European Privacy Association
28. European Women Lawyers' Association (EWLA)
29. European Federation of Centres of Research and Information on Sectarianism (FECRIS)
30. Federation of Western Thrace Turks in Europe (ABTTF)
31. Forum Réfugiés - Cosi
32. Fundació Bayt al-Thaqafa
33. Fundacion Secretariado Gitano
34. Helsinki Foundation for Human Rights

35. Human Rights Without Frontiers
36. IDHAE- European Bar Human Rights Institute
37. ILGA-Europe
38. Irish Mental Patients' Educational and Representative Organisation (IMPERO)
39. Institut culturel de Bretagne
40. Institut de Drets Humans de Catalunya
41. International Federation of Social Workers (IFSW)
42. International Juvenile Justice Observatory
43. Irish Council for Civil liberties
44. Istituto di Studi Giuridici Internazionali - Institute for International Legal Studies (ISGI)
45. Latvian Human Rights Committee
46. LAW, Legal Aid Worldwide
47. LGBT Denmark
48. Light For The World
49. Lesben und Schwulenverband in Deutschland (LSVD)
50. Maisha e.V. African Women in Germany
51. Marangopoulos Foundation for Human Rights
52. Memorial de la Shoah
53. Mental Health Association of Malta (MHAM)
54. Mental Health Europe
55. Migrant Rights Centre Ireland
56. National Secular Society
57. National Lesbian and Gay Federation (NLGF) Ireland
58. Platform for International Cooperation on Undocumented Migrants (PICUM)
59. Rechtskomitee LAMBDA (RKL)
60. Serbian Democratic Forum
61. Sikh Council UK
62. UNITED for Intercultural Action
63. VIS – Volontariato Internazionale per lo Sviluppo
64. Yad Vashem

ANNEX II: COMMENTS TO OPEN QUESTIONS

Below you will find a compilation of all comments that FRP participants provided when answering to open questions. Please note that language is not edited.

Please assess quality and relevance of the selected chapter(s):

FOCUS - Bringing rights to life: The fundamental rights landscape of the European Union

- The Community Security Trust works to protect the rights of the Jewish Community in the UK, but we increasingly interact with other faith communities, and government in pursuit of these aims. We also provide assistance to some other minority faith communities in the UK. **(Community Security Trust)**
- There is no mentioning of the need for the protection of immigrant children from maltreatment – abuse which is justified in their communities by religious rules and traditions, ignoring the International Convention of the Rights of the Child and the laws of the European countries. Reports of marriages between children and genital mutilation of girls are increasing in many European countries and there is no mention of this problem in this chapter as it should. Children’s rights in relation to employment are not mentioned either. The work of a human rights lawyer is becoming more and more complicated due to the different layers of human rights standards and protection mechanisms. The Focus chapter have a great didactic, educational value and the HFHR will use it among younger employees and volunteers to provide them with a comprehensive landscape of human rights. **(European Centre of the International Council Of Women)**
- In the Focus chapter, when going over the international and European standards guaranteeing the rights of European citizens, one may mention, notably in regards to Chapter 4 and 8, the following standards as they protect the rights of children in conflict with the law: - The UN Standard Minimum Rules for the Administration of Juvenile Justice – 1985 - The UN Rules for the Protection of Juveniles Deprived of their Liberty - 1990 - The UN Guidelines for the Prevention of Juvenile Delinquency – 1990 -The UN Standard Minimum Rules for Non-Custodial measures – 1990 - The UN General Comment No. 10 on the CRC Children’s rights in juvenile justice – 2007 - The UN General Comment No.13 on the CRC The right of the child to freedom from

all forms of violence – 2011 – Recommendation concerning new ways of dealing with juvenile delinquency and the role of juvenile justice – 2003 – European Rules for Juvenile Offenders Subject to Sanctions or Measures – 2008 – Towards an EU Strategy on the rights of the child – 2006 – EU Agenda for the Rights of the Child – 2011 (not just in the vertical chronology) (**International Juvenile Justice Observatory**)

Chapter 1: Asylum, immigration and integration

- A broader discussion with stakeholders should be reflected. It would lead to a deeper understanding of the issues at stake and how to tackle them. (**United or Intercultural Action**)
- Whilst it is clear that EU member states have to seriously consider the influx of migrants the statistics related to genuine distressed cases have to be better tracked. (**Sick Council UK**)
- When you work in the field, always with lot of pressure, less facilities than you need, etc...you really don't find lot of moments for reflection and for knowing about others experiences, thinking, opinions...it's really useful because it provides you about information we will never be able to access to. (**Fundació Bayt al-Thaqafa**)
- For the future, it could also be good to assess the role of EASO in relation to the promotion of fundamental rights sensitive guidelines, including in relation to cases relating to gender, sexual orientation and gender identity, as well as any other relevant reason for persecution. (**Istituto Studi Giuridici Internazionali**)
- Nous notons avec plaisir que de nombreuses références sont effectuées tout au long du rapport à divers travaux et communications provenant des organisations de la société civile européenne. Chapitre 1 : - Les informations fournies dans ces sections sont de qualité et constituent des outils comparatifs précieux. La section relative à l'asile semble toutefois très courte par rapport à la trentaine de pages du chapitre. - Les encarts sur les « pratiques encourageantes » sont particulièrement intéressants quant aux initiatives menées dans différents Etats membres. - Pour que les lecteurs qui choisissent de ne lire que le chapitre sur l'asile et la migration ne manquent pas des informations importantes, il aurait été intéressant de faire une référence transversale à la section sur les mineurs non-accompagnés du chapitre sur les droits de l'enfant (4.4). - Dans la section sur l'intégration, une section spécifique sur les réfugiés réinstallés aurait pu être intéressante. - La section sur les solutions alternatives à la rétention est particulièrement instructive. - Il y a une erreur dans le texte 1.3.1 sur la santé – il est fait référence à la directive sur les qualifications professionnelles alors qu'il s'agit de la directive « qualification ». - Il aurait été intéressant de développer la section « Perspectives » pour l'étoffer par exemple

avec un calendrier des étapes à venir au niveau européen (négociations, refontes d'instruments législatifs). (**Forum Refugies COSI**)

Chapter 2: Border control and visa policy

- Il aurait été intéressant de traiter de la question de l'accès à la procédure d'asile à la frontière dans ce chapitre, afin de considérer d'éventuelles infractions aux droits fondamentaux. (**Forum Refugies COSI**)
- This chapter is useful for us as we are also in contact with a research institution based in Kyiv which analyses the implementation of the EU rules in this matter for Ukrainian citizens. (**Human Rights Without Frontiers**)
- A remark about Fortress Europe (2.1.1) mentioned as an Italian NGO. UNITED has been monitoring this since 1993 under the same name: see the text below taken from the UNITED website. It is published annually in cooperation with the French newspaper Le Monde Diplomatique. You may download the list from: www.unitedagainstracism.org/pdfs/listofdeaths.pdf

Death by Policy The Fatal Realities of "Fortress Europe" - 16.264 Deaths - Since 1993 UNITED has been monitoring the deadly results of the building of 'Fortress Europe' by making a list of the refugees and migrants, who have died in their attempt of entering the 'Fortress' or as a result of Europe's immigration policies. More than 16.136 deaths have been documented up to now. If the death of over 16.136 people does not wake up Europe's conscience, what will? campaign poster (pdf 274 KB) List of 16.264 documented refugee deaths through 'Fortress Europe' (pdf 553kB) Working with the list of deaths WELCOME to Fortress Europe CONTENTS From hope to tragedy Blood on European hands Fortress Europe: A Deadly Exodus Border management & externalisation Detention Deportation Process ineffectiveness Unaccompanied minors Environment The UNITED List of Deaths 20 June: International Refugee Day Adopt a case: give the campaign a human face Death by Policy: These deaths are not isolated incidents Send a Letter of Protest From hope to tragedy Since 1993, UNITED has been monitoring the deaths of asylum seekers, refugees and undocumented migrants seeking a better life in Europe. The cases included in the 'List of Deaths' range from fateful attempts to enter the impenetrable fortress that Europe has built around itself to those on clandestine journeys and during state-operated detention or deportation. Whilst they reveal diverse causes and circumstances, they are all the result of an increasingly complex, unworkable and unjust system. Blood on European hands These deaths are not isolated incidents but are the direct consequence of tightening

EU immigration policy. In the face of civil war, conflict, global political and social unrest, and the deepening effect of climate change, Europe responds by adopting exclusionary practice and policies, turning a blind eye to the root causes of migration. The List draws unwelcome attention to the role of our societies in protecting those who flee from war, persecution and poverty and highlights the serious flaws in our asylum and immigration systems that routinely threaten individual human dignity. These rights are laid out in the 1951 Geneva Convention; they are not simply a set of values and principles we should try to uphold, but constitute international law. Each time they are broken, they are therefore a direct violation of the protocols to which each participating country is bound. Download UNITED's regularly updated list of death cases from www.unitedagainstracism.org/pdfs/listofdeaths.pdf Fortress Europe: A Deadly Exodus (**United or Intercultural Action**)

Chapter 3: Information society and data protection

- The concerns on different aspects of data protection raised by the European authorities (such as the negative opinion of the Data Protection Supervisor in PNR) could be presented (e.g. in the same manner as the FRA concerns. (**Helsinki Foundation on Human Rights**).
- One way to think about information society and data protection this year is as a contest between the impact of a sour economy and the power of shifting democracy across EU. It's easy to understand that Europe with a rising standard of living and fundamental rights for all Europeans has been badly dented by accumulated debt and crisis of euro zone. Europeans are less worried this year about fundamental rights and increase of data security than about unemployment. The new privacy requirements set the bar high for companies. These requirements also reflect a growing sensitivity and awareness on a part of European citizens regarding personal data flows in the public and private sectors. Privacy laws and regulations will allow DPAs and EU agencies to respond to citizens' concerns about their activities and also to be current with, or perhaps even slightly ahead of, the evolution of privacy practices and laws in the private and public sector. Then, there are some conflicts between the philosophical approaches to the two positions: companies' first goal is to ensure that the business can move forward and to revive the economy, and the regulators are primarily concerned with safeguarding the individual's privacy rights. That's where you can have some points of contention. It is certainly an important challenge, to achieve the security and data protection that European Union needs to grow and flourish as an economy, as a community, while also protecting the rights and the privacy of the individual. It is often questioned whether we can achieve both security and privacy. To this, of course, the answer would be a resounding YES. The framers of European Constitution clearly thought so: their enumerated list of

purposes for government included: establish Justice, promote the general Welfare, and defense the fundamental rights. Anything less is a failure of our social contract, and at the end a failure to advance a safe and open society. **(European Privacy Association)**

Chapter 4: The rights of the child and protection of children

- There is no mentioning of the need for the protection of immigrant children from maltreatment –abuse which is justified in their communities by religious rules and traditions, ignoring the International Convention of the Rights of the Child and the laws of the European countries. Reports of marriages between children and genital mutilation of girls are increasing in many European countries and there is no mention of this problem in this chapter as it should. Children’s rights in relation to employment are not mentioned either. **(European Centre of the International Council of Women)**
- Very pleased you have included data about RC Clerical Abuse. Worried about observation and complaints being handled by the organisation itself. It has a huge reputational and financial interest in hushing things up and neutralising complaints, which have often lead to the prolongation of abuse. Need to make more emphasis on independence. **(National Secular Society)**
- Children’s and young person’s protection related to employment is missing. Genital mutilation, child marriages and other inhuman and degrading forms of treatment of female infants and girls must also be dealt with under particular headings in Chapter 4, for the reasons stated in Chapter 5 (see below). **(Marangopoulos Foundation for Human Rights)**
- Ce chapitre traite très bien de questions très importantes, telles celles de la violence, des abus sexuels, de la traite etc. Cependant, d’autres questions très actuelles et importantes, telles celles de la protection des enfants au travail, qui fait l’objet d’une directive, des mutilations sexuelles d’enfants et de bébés et d’autres traitements criminels d’enfants, ainsi que des mariages d’enfants n’y apparaissent pas. Ces traitements inhumains ou dégradants, appliqués traditionnellement dans des pays tiers, sont de plus en plus «importés» en Europe et font l’objet de graves préoccupations des institutions de l’UE. Certaines de ces pratiques sont mentionnées en passant dans le chapitre 9 (droits des victimes), sans référence à des enfants. Elles devraient être traités plus spécifiquement dans des sous-chapitres spéciaux du chapitre 4, afin qu’il soit clair que le relativisme culturel par lequel elles sont souvent justifiées constitue un encouragement à des actes criminels **(Association des femmes de l’Europe méridionale - AFEM)**

Chapter 5: Equality and non-discrimination

- The presentation of EU law regarding gender equality is very incomplete. ECICW has repeatedly pointed out to FRA that gender equality is, according to the Treaties and well established and quite rich CJEU case law, an EU fundamental value, a fundamental principle and right and a horizontal objective of the EU, which both the EU and its Member States have the obligation to respect and promote in all areas. We would be happier if part. 5.3 were entitled 'Gender Equality', not Discrimination on the grounds of sex', as this title does not reflect the gender equality principle, which is not negative, but strongly proactive. The report focuses on the rights of pregnant women as workers. There is no mention of their rights to health and perinatal care. The Report does not link maternity protection to gender equality, as it should, and does not refer to the EU rules and CJEU case law on women's rights related to reproduction, pregnancy and maternity. Moreover, the principle of harmonization of family and work responsibilities, which is reflected in the parental leave directives and recognised by well established CJEU case law as a natural corollary of gender equality and a means for its substantive achievement, is missing. **(European centre of the international council of women)**
- Multiple discrimination in EU law is also very incomplete. According to the non discrimination directives, it concerns women, something that the Report omits. Moreover, it is not a mere 'conceptual and factual reality', as the Report says, but a legal concept, since the non-discrimination directives require that, in accordance with Treaty provisions, the impact of measures implementing the non-discrimination directives on men and women and multiple discrimination against women must be taken into account in the evaluation of these measures. **(Marangopoulos Foundation for Human Rights)**
- Le nombre de cas de discrimination vis-à-vis des minorités religieuses est en augmentation dans les pays de l'est et aussi dans des pays comme la France ou la Belgique. Cela n'est pas indiqué dans le rapport. **(Coordination des associations et des particuliers CAP Liberté de conscience – Coordiap)**
- More information regarding inter-sex people **(Rete Lenford)**
- I note the comments about intolerance to Muslims in the UK. Could you address the evidence of the growing radicalisation of young Muslims (not suggesting cause or effect relative to intolerance) e.g. erection of posters in east London saying "gay-free zone" and implications for future of Human Rights. A further culture clash over growing evangelical Christianity v. secularity in Eweida Chaplin McFarlane and Ladele (not brought to ECtHR until 2012) <http://www.secularism.org.uk/news/2012/09/nss-intervene-in-landmark-cases-at-european-court-of-human-rights> and <http://www.secularism.org.uk/uploads/nss-intervention-to-european-court-of-human-rights.pdf> and Hall and Preddy v. Bull (rejection of gay couple from private hotel) **(National Secular Society)**

- Accuracy: not excellent, because the description of the situation of Roma in Spain is not very realistic. Readability: very good, but it would be desirable the publication in Spanish in order to facilitate a better dissemination in our country. Layout: lack of pictures, too much text. Pictures can illustrate issues, and ease lecture. Tables and figures: please put data and statistics always disaggregated by sex. Outlook: take into account that situation of Roma in Spain are often different compared with other EU countries; include these differences in future reports. **(Fundacion Secretariado Gitano)**
- Although it was appreciated, a more general attention may be paid to indirect and masked kinds of discrimination against third countries nationals. Unfortunately, we know that Roma are still discriminated but racism is widespread in everyday life also against other groups, too often supported by political choices. Thus, more space can be dedicated in this respect. **(Department of Political Science, Dispo - University of Genoa)**
- The discrimination against the persons belonging to national minorities still require much more consideration and reference in the Annual Report and this area must be included either as a separate thematic area with a detailed overview and further research on the issue or this must be included as a part of the thematic area of discrimination based on sex, race or ethnic origin, religion or belief, disability, age, or sexual orientation and against persons belonging to minorities and any combination on these grounds (multiple discrimination) taking into account diversity. With regard to developments and trends in hate crimes, Greece needs urgent attention. The rise of the far-right under conditions of economic crisis is a serious concern in Greece, where economic hardship and the increasing number of undocumented migrants in the country deepened xenophobia and intolerance against migrants and asylum seekers in central Athens and other regions in Greece. In the time of deep economic crisis, nationalist and far-right wing parties such as Golden Dawn has presented a strong discourse against migrants and asylum seekers in Greece and it has gained strength and popularity among Greeks. The migrants and asylum seekers face a hostile environment over the past decade; however xenophobia and intolerance against migrants and asylum seekers turned into xenophobic incidents and hate-motivated attacks in the last years. Extreme nationalist discourse drifts towards violence against vulnerable groups, in particular against migrants and asylum seekers in Greece. The xenophobic and hate-motivated violence appears to be not limited to migrants and asylum seekers in and around Athens. The political discourse against migrants and asylum seekers has led to violence against persons with different nationality and/or ethnic origin, religion or language in other parts of the country. Since the election of Golden Dawn to the Greek Parliament in the June elections, the Turkish Minority faces an increasing hostile environment. On 6 August 2012, a group of nearly 150 members of extreme nationalist Golden Dawn(Chrysi Avgi) party marched toward Komotini Turkish Youth Union(Gümülcine Türk Gençler Birliği)(GTGB) and chanted slogans against Turkey and Turkish Minority of Western Thrace, and the group threw bottles to the garden of the association. On 12 August 2012, a group of members of the Xanthi provincial organization of Golden Dawn (Chrysi Avgi), who carried Greek flags in their hands, drove by the Turkish villages in

Xanthi by motorbikes and cars and nurtured a climate of fear among the minority living in the Turkish villages of Yenice, Beyköy and Okçular. Lastly, on 23 August 2012, headquarter of Party of Friendship, Equality, Peace (Κόμμα Ισότητας, Ειρήνης και Φιλίας) , which is established by Turkish Minority of Western Thrace, was attacked in the late hours of evening and illuminated sign of the party was broken with rocks. The persistent hate speech in the mainstream media with an explicit manifestation of hatred against Turkey makes the Turkish Minority of Western Thrace, of which all of whom are Greek citizens, a vulnerable target for far-right and/or extremist groups. With regard to discrimination in education in Greece, ABTTF would like to highlight the discrimination with respect to the right to education in mother tongue at the preschool level on the children of the Turkish Minority in Western Thrace, northern region of Greece where the minority children who completed the 5th year of their age has to attend in majority kindergartens under the Ministry of Education, although the minority is granted the right to establish, maintain and manage its own educational institutions which give education on the mother tongue of the minority, namely Turkish with the 1923 Treaty of Lausanne signed between Greece and Turkey. The law does not bring any regulation about ethnic and cultural difference of the children in Greece, all pupils who have completed the 5th year of their age is obliged to attend state kindergartens where the language of education is only in Greek. The right not to be discriminated is violated because Greece without an objective and reasonable justification fails to treat differently minority children who speak a different language other than Greek. Regarding ethnic discrimination in employment, in Greece deep economic crisis with high unemployment rates in the region resulted loss of their jobs and deteriorated the basic conditions of their life. Since Macedonia-Thrace decentralized administration recorded highest rate of unemployment in Greece, most of persons belonging to Turkish Minority of Western Thrace lost their jobs. Most of the young minority men went abroad, mostly to other European countries for seasonal jobs in order to maintain the supply of their families. The division of families bears as an additional burden for minority women and this kind of division may result in declining relationship between fathers and their children. Although Greece introduced a 0.5 % quota in 2008 (under Law 3647/2008) for persons belonging to the Turkish Minority of Western Thrace in order to redress the imbalances in the representation and participation of the Minority in economic life, this special measure has, thus far, not been implemented in Greece. The European Commission against Racism and Intolerance (ECRI)'s 4th Monitoring Cycle Report on Greece in 2009 highlighted that a comprehensive long-term programme has not yet been established by the authorities to improve the integration of the Turkish Minority of Western Thrace into the labour market, and it noted that reports indicate that the Turkish Minority of Western Thrace continue to be under-represented in the public sector and state-owned corporations. **(Federation of Western Thrace Turks in Europe - ABTTF)**

Chapter 7: Participation of EU citizens in the Union's democratic functioning

- For our organisation participation of migrants and background migrants citizens in European, national, regional and local life and institutions is a key question to equality of rights. **(Fundació Bayt al-Thaqafa)**

- La communication des Etats membres auprès des citoyens doit apparaître, car elle détermine leur connaissance de leurs droits. Ex l'intiative citoyenne est inconnue en France. Un point peut être intéressant sur la place laissée dans les médias nationaux à l'information sur l'actualité de l'Union. **(Institut Culturel de Bretagne)**
- Je regrette que la FRA ne se soit pas impliquée (pas de description des activités de la FRA dans ce domaine) ou n'ai pu s'impliquer dans ce domaine pourtant crucial du fait qu'il permet aux citoyens de contribuer à la vie démocratique de l'UE et de les stimuler à la vie politique de l'UE. **(Bretagne Reunie)**

Chapter 8: Access to efficient and independent justice

- As worrying as the economic situation is and as important as reducing the length of court proceedings, broadening legal standing before courts and developing e-justice are, one should not forget the importance of juvenile justice. In accordance with the 2011 Agenda on the Rights of the Child, the IJJO wished the FRA had given more weight to this topic in its 2011 Report. As a matter of fact, juvenile justice was pointed out as one of the key areas to be addressed in the aforementioned Agenda; yet, according to this report, the FRA did not pay close attention to juvenile justice or the rights of children in conflict with the law. The IJJO understands the FRA can only act within given prerogatives. To this extent, a review of the FRA areas of competences within the "Descriptions of FRA activities" may be more than relevant for upcoming reports. **(International Juvenile Justice Observatory - IJJO)**
- This chapter is very inadequate regarding EU law. In its contributions to the FRA the MFHR is constantly stressing the importance of Effective Judicial Protection for the implementation of human rights. Access to Justice is only one aspect of Judicial Protection, which is a fundamental EU principle and a fundamental right elaborated by well established CJEU case law and enshrined in the Charter. The specific aspects of this very crucial principle under EU law and CJEU case law should have been presented and underlined in the Report, in particular certain procedural rules included in the gender equality and non discrimination directives, such as the rules on the standing of organisation to pursue victims' claims before national courts and other competent national authorities and the shifting of the burden of proof. In view of the reluctance of women and vulnerable groups to have recourse to the courts or even to other competent authorities and their ignorance of their rights, these rules are very crucial. Other aspects of the Principle of Effective Judicial Protection, such as the requirement of real and effective sanctions, also included in the gender equality and non discrimination directives and developed by CJEU case law, should also be explained and stressed. **(Marangopoulos Foundation on Human Rights)**
- Extremely complete. The explanation of the EU legislative process is very useful, as it is complicated and not always transparent. The concerns raised by civil society as

to different legislative proposals could also be mentioned and analysed (particularly to the draft directive on access to a lawyer). **(Helsinki Foundation for Human Rights)**

- A third pillar of the privacy framework at the European and national level reflects a growing reliance on technology to move data--both in government spaces and on the Internet. For example, the e-Justice Portal of 2010 contained a landmark requirement for privacy impact assessed by CCJE. The e-Justice Portal set forth a comprehensive framework in the ordinary course of business of justice--serving European citizens. Moreover, e-Government service would offer a cost effective route for every citizen and business and participatory government. e-Government service ca reduce costs, save time for public administrations, citizens and businesses. Today, despite a high level of availability of e-Government services in Europe, differences still exists amongst Member States and the take-up of e-Government services by citizens is still low. **(European Privacy Association - EPA)**

Chapter 9: Rights of crime victims

- The Convention on combatting domestic violence of the Council of Europe could be more present in the chapter, particularly assessing the additional value of the Convention to the actual state of protection and the member states standards. **(Helsinki Foundation for Human Rights)**
- It is important, from the point of view of ILGA-Europe as a human rights and anti-discrimination organisation, that the question of bias-motivated crime is addressed by this chapter. As is area is only partially covered by EU law obligations, it has been a good choice to mention other instruments and other human rights mechanisms, as well as good practices. Maybe it would have been good - and it will certainly be in 2012 - to also pay attention at the new obligations created by the Victims' Rights Directive to be adopted later in 2012, as regards victims of bias-motivated crimes when considered as victims having particular needs. **(ILGA Europe)**
- Even though this Chapter is dedicated to the Rights of crime victims, within the "Analysis", this report does promote the benefits of alternatives to detention for children (Ireland example). For the 2012 FRA report, what about a Chapter focusing on victims as much as on offenders and witnesses of a crime? **(International Juvenile Justice Observatory - IJJ0)**

Chapter 10: EU Member States and International organisations

- Excellent that this information is all in one place and so accessible. **(European Council on Refugees and Exiles - ECRE)**
- The tables covering the ECHR judgments in different EU member states are also available at the ECHR web page and in their statistics. There is no need to include them in the report of the FRA. It would be more important to have some merits on the reform of the ECHR, on the accession of the EU to the Convention and an analysis of the debates. Highlighting the role of FRA in the processes. **(Helsinki Foundation for Human Rights)**

How are you going to use the results of the report in your work?

- A program of activities related to human rights in high schools, that will be implemented from next year, will include a section on FRA and its Annual report. **(Department of Political Science, Dispo - University of Genoa)**
- Advocacy: it is useful but there is a barrier of the language (politicians and stakeholders do not speak English or French). Training: according to the type of beneficiary of training, we can use some of the data, but in other cases not. **(Fundacion Secretariado Gitano)**
- The HFHR will rely on the report and data collected in the report in its legal activities, e.g. pleadings (third party interventions) before national courts. **(Helsinki Foundation for Human Rights)**
- For my lectures and in conferences. **(Human Rights Without Frontiers)**
- ILGA-Europe mainly engages in two types of activities: advocacy actions and capacity building activities organised for smaller networks and national and local NGOs. This report, on top of providing a globally accurate picture of the situation of fundamental rights in the EU, will also be helpful for such organisations to become better able to identify the existing standards and obligations of national and European authorities according to all levels of legislative instruments. We consider that it is a good thing for the FRA to engage in the development of such an annual tool. **(ILGA Europe)**

Based on your assessment of the Annual Report 2011, how could the FRA improve next year's report?

- Being from an organization that works on religious liberties issues, I was disappointed to see that no mention of intolerance and non-discriminations against religious groups (including Christians) were addressed despite more reported cases than at any time in Europe's history. Furthermore, although I thought the chapter on non-discrimination was most helpful, it should nonetheless not have been defined as a substantive right (as it is not under European or international law). **(Alliance Defense Fund)**
- By asking in advance specific set of questions to the NFPs. **(ANTIGONE)**
- More case law analysis and legislation from all the jurisdictions in EU **(Avvocatura per i Diritti LGBTI-Rete Lenford)**
- Sans remettre en cause la traduction du rapport il serait intéressant que le lecteur puisse identifier la provenance de la traduction. **(Bretagne Réunion)**
- In our view there are various elements of weakness, concerning an excessive length of the document, a too wide 'encyclopaedic' approach, the lack of cross-sections trying to demonstrate the essential 'indivisibility' (together with the 'universality') of fundamental rights, specially in real life, the use of an uncommunicative language with sometimes unhappy expression (such as the "intricate web", right at the beginning of the document, transmitting to a common reader a sense on confusion and uneasy, instead of the perception of a "rich and articulated set" of...), and more generally the scope and structure of the Report, in view of the fundamental issue about the 'public' to which the report is addressed, and for what objective (simply informative, more communicative, or even proactive in certain regards). Improvements would be desirable with regard to: a) readability (reduced format, use of the language, cross-sections, summaries); diffusion and promotion ('presentation days'; authorized translations) with the support of the organisations participating in the Fundamental Rights Platform. **(Centro di eccellenza Altiero Spinelli - CeAS)**
- It is important also to have hard copies not only telematics. **(Comitato per la promozione e protezione dei diritti umani)**
- I do not believe FRA reports should duplicate those of other agencies, e.g. ECRI and OSCE, but be complementary to them. So for example, CoE and ECRI also cover international developments as well. **(Community Security Trust)**
- Afin de mieux prendre en compte le domaine d'activité de l'association, les discriminations envers les minorités de religion. En 1 que l'association apporte plus d'éléments sous forme de rapport et de cas précis de discrimination à la FRA. Communiquer plus avec la FRA sur ces problèmes. Que la FRA prenne en compte les

rapports fait sur ce sujets par les associations présentent à la plateforme.
(Coordination des associations et des particuliers CAP Liberté de conscience)

- Focus more on new and emerging technologies. **(Centre for Science, Society and Citizenship)**
- More accuracy on conceptual and theoretical aspects (e.g. intersectionality) - more on national minorities, who are totally lacking in this report - introducing diversity as a separate and positive component of the report - introduce a section on "new" rights/developments in international courts on a new set of rights going beyond the text of treaties and laws e.g. same-sex-marriage... **(European Academy EURAC - Institute for Minority Rights)**
- "We find the report will prove very valuable to all organizations as a reference document. We are left with the feeling that many points made during the FRA Platform meeting as well as some of our written contributions (previous questionnaires) are systematically ignored. In all honesty, we suspect that our responses are registered only as numbers i.e. 70% of the participants responded... All subjects in the annual report are of the outmost interest. However in some chapters we can note a lack of equilibrium; problems referring to pregnancy are covered in one page (131) problems of LGBT are covered in pages 132-136. **(European Centre of the International Council Of Women (Eicw))**
- By getting the support of the relevant NGOs who have expertise in their field of study and activities. In particular, when presenting the report. **(European Jewish Congress)**
- Les questions relatives à l'identité religieuse pourraient être développées. **(European muslim union)**
- I am pleased to have been a small part of the discussions towards the guidance on redress mechanisms on data protection. I believe that the Annual Report would allow EC and European agencies to respond to citizens' concerns about their rights and the use of their rights and also to be current with, or perhaps even slightly ahead of, the evolution of European practices across Member States. Annual Report primary job could be to map and monitor important developments in the area of fundamental rights to promote a rising standard of living and fundamental rights across Europe. The Annual Report should highlight those countries who are vigilant, active and well informed. It is FRA office's job to ensure that such analysis is performed, at all times, with accuracy and in deeper. **(European Privacy Association)**
- By taking into account the possible violation of human rights, especially those of children, by totalitarian groups. **(European Federation of Centres of Research and Information on Sectarianism – FECRIS)**

- FRA could improve next year's report in a way that the report reflects more about the developments at national levels. **(Federation of Western Thrace Turks in Europe - ABTTF)**
- Compte tenu de la longueur du document, il convient de renouveler la publication d'un document résumé avec les highlights du rapport global. - La possibilité d'accéder directement aux différents chapitres est une bonne pratique qui permet un accès rapide à l'information. Il serait en outre utile d'inclure un index des sections de chaque chapitre au début de ceux-ci pour faciliter la lecture aux personnes qui lisent les chapitres isolément (par exemple, une table de matière spécifique dans chapitre sur l'asile et la migration, pour trouver directement les informations sur l'accès à la santé dans la section sur l'intégration). - Considérant sa montée en puissance en 2012, il convient d'analyser dans le rapport de l'année prochaine le rôle du BEA et ses prérogatives au regard des droits fondamentaux. **(Forum réfugiés - Cosi)**
- More than improve the year's report, we think that it would be necessary to improve this visibility at community level. **(Fundació Bayt al-Thaqafa)**
- Statistical data breakdown by sex, very important. Including more references to the lack of data in many countries (including Spain) and the lack of real application of rules and laws concerning anti-discrimination. The testimony of victims should be included, the presence of real and concrete cases is important (include a chapter about victims of discrimination). Publication in several languages. The report includes references to islamophobia, homophobia, racism, etc., which is very important. However, the term "romaphobia" or "antigypsyism" is not included, and we consider that it should be tackled as a specific kind of racism, using the term in the report and trying to find its features and causes. **(Fundacion secretariado gitano)**
- Besides highlighting the activity of the FRA (e.g. opinion on a draft directive) it could be interesting to know to what extent the activity influenced on the EU institutions and measures (e.g. was the opinion of FRA taken into account while drafting a directive or concluding an international agreement). Many of the EU countries are under the UPR second cycle. Recommendations to different countries could be included in the report. The final chapter should be reconsidered. The chapter is vital, however the scope of information should be redesigned to present a compilation of processes and cross-cutting issues between the institutions (e.g. different approach of the two courts - the CJ EU and the ECHR). There is no need to report on the data which are available on web sites and reports of other institutions. It could be interesting to have a review of key human rights activities of different institutions (e.g. main resolution of the European Parliament in the human rights field). **(Helsinki Foundation for Human Rights)**
- Better coverage of the discrimination based on religion or belief. **(Human Rights Without Frontiers)**
- ILGA-Europe considers that the current concept should be preserved and developed. Certain points could allow for further improvement: - the collection of more or more detailed good practices (however, this could also be done indirectly by referring to

other relevant researches/publications by the Agency in the areas where such publications exist); - an emphasis on the articulation between this annual report and the thematic reports produced during the whole year by the Agency. Maybe could it be helpful to develop a highly visible system of cross-references. In several cases, previous consultation with civil society could allow to identify some areas of concerns that could be addressed in the report. This should be organised in a careful way, but could be beneficial for the Agency to identify additional resources in certain areas of human rights. - Finally, ILGA-Europe insists on the fact that the FRA being an EU Agency, it should continue to focus on the assessment of information and developments at EU level against the fundamental rights benchmark. This does not mean that less should be done on the international and national developments that are always interrelated. **(ILGA-Europe)**

- Well diagnosis is key. Are mental patients being discriminated and denied their human rights? What is the basic mechanism by which this abuse is instituted and allowed? **(IMPERO - Irish Mental Patients' Educational and Representative Organisation)**
- Les droits des minorités nationales ont été exclus du rapport, ainsi que la protection des langues minoritaires, Il semble important de les mentionner dans le prochain rapport. **(Institut culturel de Bretagne)**
- The austerity measures that are currently a feature of public services have had a disproportionately harsh impact on those citizens who are already most marginalised and disadvantaged. We believe that greater reference should be made to persistent and extreme poverty and social exclusion and would suggest that it is imperative that FRA is in the forefront of confronting policy makers with evidence of the immediate and long term consequences of their actions in terms of human suffering and the fact that short term savings on health and welfare will result in greater future expenditure. Such evidence should include the incidence of particular health conditions associated with poverty and disadvantage, health inequality and unacceptable variations in life expectancy. In our response to previous Annual Reports we have requested FRA to focus specifically on the conflicting rights of different parties and the challenges Social Workers face assisting people to identify and manage such conflicts. Whilst we appreciate that fundamental rights are indivisible we believe that more attention should be paid to the interaction between the rights of different groups and the need for greater clarity about circumstances where it may be considered legitimate to override these. Such conflicts are not just those that arise between individuals and within family groups but include instances where it is argued that the “public interest” outweighs the rights of the individual concerned. Examples in the UK include the lifting of reporting restrictions on the identity of juvenile offenders convicted of serious offences and the populist notion that prisoners should forfeit a range of rights such as that of casting a vote in parliamentary elections. We are pleased to note the progress that has been made in securing this right for people who lack capacity but believe that FRA should actively promote a wider debate about those circumstances where it may be considered appropriate to deny or restrict a person’s fundamental rights. Breaches of the fundamental rights of young people continue to be all too common and FRA must promote greater recognition of the right of all children to belong and contribute, to

be listened to and to live without fear. This should include the right to know your origins in the context of assisted reproduction and adoption and to enjoy protection in law from physical punishment and other forms of demeaning treatment in all settings. We are pleased to note the research that is being conducted into juvenile justice systems and hope it will consider the misconceived drive in England to give the press access to judicial processes concerned with decisions about children following family breakup on the grounds that better practices would result even although such access would very likely compromise the right to privacy. We welcomed the work that was being done by FRA on Children's Rights Indicators in particular the emphasis on participation and wonder what progress has been made on this important undertaking. As social workers we remain concerned that society has only just begun to acknowledge the abuse that occurs behind the scenes in all cultures. More attention needs to be paid by FRA to the protection of vulnerable adults who are at risk of not having their rights recognised or subject to abuse and less likely to be able to challenge this without assistance. Indeed we consider that FRA could more generally focus on the rights and entitlements that affect younger adults with dependency requirements and older people including end of life issues such as advanced directives, a dignified death and the responsibility of all member states to ensure an adequate range of support to enable people to live in their own homes or other non-institutional settings and on no account to be separated from their spouses by reason of the failure of the responsible authority to provide appropriate facilities. We acknowledge the importance of the data about variances in asylum and immigration policy contained in the report but would suggest that FRA give consideration to the stance that should be taken by professionals who are committed to upholding people's rights when faced with arrangements that clearly compromise these. Examples of this are situations where children are inappropriately held in immigration detention or subject to repatriation policies that will expose them to further abuse. FRA must recognize that professionals such as social workers cannot simply to turn their backs on children and families in such situations. We continue to consider that FRA should emphasise the importance of ownership of personal information resting with the data subject and the principle that information shared for one purpose should not be used for another. We would also like FRA to acknowledge the onerous responsibility that social workers shoulder on behalf of the rest of society to identify the abuse of human rights and the fact that when they "blow the whistle" on such situations they often pay a high personal price, particularly where they express concerns about their own employer. We believe FRA should consider how such individuals can be empowered to speak out without detriment to themselves. We remain concerned that many social service and health professionals work in systems which are inherently abusive. Examples we have given previously and which continue to be relevant are that of a social worker placing an elderly couple in separate institutions when their individual needs cannot be met in the facilities available and where alternative care may be arranged for a child when the social worker is unable to mobilise the required level of support for them to remain with their parent(s). Such situations very often reflect resource constraints and we continue to consider that this issue merits FRA's attention. We also think that FRA could usefully focus on situations where the activities and agendas of different professions and groups are in conflict such as where there may be an over-riding concern on the part of social workers to secure the confidence, protection and well-being of individuals who may have been trafficked whereas the primary agenda of other groups may be to control immigration and repatriate them

to abusive situations. We would hope that some progress would be made to ensure equal access to information for all groups now that the UN convention of rights of persons with disabilities is firmly enshrined in law. However we believe that FRA requires to focus on communication more generally in terms of language and more specifically in relation to the rights and needs of particular groups such as those with audio and visual impairment. The rights of people with special requirements arising from sensory impairment require to be considered including the provision of interpreting services and augmentative communication devices. We continue to believe that there is scope for FRA to be more actively involved in responding to inappropriate kneejerk responses by National Governments such as the proposal to evict the parents of “rioters” from their homes in England, inappropriate resort to custodial sentences for first offenders and lack of acknowledgement of the long-term implications of excessive reliance of imprisonment particularly in the so called developed nations rather than radical measures that promote a more equal and cohesive society. **(International Federation of Social Workers - IFSW)**

- Within the "Description of the FRA activities", review the competences: how far can you go given the legal framework of the European Union? - In accordance with the 2011 Agenda on the Rights of the Child, please give more consideration to children in conflict with the law and juvenile justice as a whole. For instance, why not expand the focus of Chapter 4, 8 and / or 9? **(International Juvenile Justice Observatory)**
- A) Informations on FRA activities should be described more in detail (yellow boxes are too concise). The opinions, papers, drafts delivered by the FRA have to be considered as an important tool for the advancement of a human rights; B) The Report, as a ‘printed book’, should be accompanied by a ‘reference website’, containing all the texts – in English and/or French – referred to in the report. C) The Report should include a description of ‘emerging’ areas of interests on fundamental rights, fostering a role for the FRA in the same areas. **(Istituto di Studi Giuridici Internazionali - Institute for International Legal Studies - CNR-ISGI)**
- We feel that a development that is inclusive of persons with disabilities is an important topic in the global role of the EU regarding human rights. In that context, we would like to see in the future FRA annual reports assessments of the progress and implementation of the issues mentioned in section 8 of the 2010 European Disability Strategy, which states that the Commission will work to promote the rights of persons with disabilities and non discrimination, and to highlight disability as a human rights issue within the EU external action, a statement which ties in with the CRPD’s article 32 on international cooperation. By extension, how are member states doing in this domain as well. **(Light For The World)**
- The MFHR is striving to inform the Greek authorities, lawyers, workers and the public at large on the nature content and correct implementation of the fundamental principles and fundamental rights of Substantive Gender Equality, Child Protection and Effective Judicial Protection. We expect the FRA to help us in this respect, which is unfortunately not the case, at least as concerns the Annual Report. The MFHR would like to stress also that the growing impact of the current global economic crisis on the fundamental rights (in particular on the socioeconomic rights) in Europe

is not duly mentioned in the Annual Report and should therefore be covered extensively in the future. **(Marangopulous Foundation on Human Rights)**

- The annual report is perfectly fine from our point of view, but there are other aspects of the FRA work that we have concerns about and would be happy to discuss further. **(Mental Health Europe)**
- Would like the work and report to include reference to caste discrimination <http://www.homeoffice.gov.uk/publications/equalities/research/caste-discrimination/caste-discrimination?view=Binary> (Executive Summary not reliable) (more info about UK on request) Identification of promising practices is good, but we should also specifically identify worrying trends. **(National Secular Society)**
- Next report should highlight the most important topics and provide case studies regarding these topics. **(Serbian Democratic Forum)**
- SCUK would like to ensure that suggestions made via the platform are openly logged so that even if they fail to be included in the programme of work for the year, the topics are not lost. For example the current survey being conducted on the experience of the Jewish community by the FRA could usefully incorporate equivalent data as a bare minimum for similar ethnic groups like the sikhs. Overall SCUK is grateful for the opportunity for civil society representation such as our organisation on such meaningful fundamental rights issues - references in the FRA report on specific challenges for minorities would be very helpful in raising EU awareness on such matters. **(Sick Council UK)**
- The contents of the report are very complete and detailed. To make the reading more enjoyable could be incorporated more images, graphs and tables. **(VIS – Volontariato Internazionale per lo Sviluppo)**
- FRA might want to consider how it could develop a short video clip for YouTube, outlining some of the key findings so that it will be very easy to learn about the report (it could maybe raise awareness about the different foci) and its contents in a short overview - not in writing but as a short video presentation. This might be done in a few different languages as well. **(Yad Vashem)**

How could the Annual Report be put to better use?

What could be done by your organisation:

- ADF would be more than pleased to gather data or provide legal analysis of religious liberty issues and the phenomenon of intolerance and discrimination against

Christians. **(Alliance Defense Fund)**

- More dissemination during various national activities. **(ANTIGONE)**
- Collection of data on LGBTI people in Italy **(LGBT rete Lenford)**
- S'appuyer sur ce document lors d'entretiens avec les députés nationaux. **(Bretagne Réunion)**
- Disseminate information about the report among partner organizations. Provide data, analysis and information about the recent development in connection with the respective fundamental rights area. **(Bulgarian Lawyers for Human Rights Foundation)**
- CSD could disseminate copies of the report during its public events on relevant topics. **(Center for the Study of Democracy)**
- Our Centre will contribute to the diffusion of FRA Annual Report through its communication tools, with regard to Italian public, such as, in particular, academic and media circles; university and secondary school students; local, regional and national authorities. To this effect is our intention to organise a 'presentation day' to bring the Report to the attention of university and secondary school students. **(Centro di eccellenza Altiero Spinelli - CeAS)**
- Be a national antenna as FRA at national level is not known or its activities are not known or are misunderstood. National focal points are missing. **(Comitato per la promozione e protezione dei diritti umani)**
- My professional focus is on international work; that of my colleagues mostly on domestic work. So I am the only member of our staff with an ongoing and close interest in FRA reports. But I also advise European Jewish agencies so they are especially relevant to my work. **(Community Security Trust)**
- Faire connaître via le réseau de l'association le rapport de la FRA. Avoir aussi connaissance de l'utilisation et de la portée du rapport de la FRA par les institutions européennes. **(Coordination des associations et des particuliers CAP Liberté de conscience)**
- We will promote FRA's activities, including the Annual report, in high schools in cooperation with our national network. **(Department of Political Science, Dispo - University of Genoa)**
- Intensify our dialogue with FRA so that the work of FRA better reflects our needs. **(European Network of (ex) Users and Survivors of Psychiatry - ENUSP)**

- Contribution to the developments on national level for Italy; contribution to the section on national minorities /to be introduced/ - contribution to theoretical debate on intersectionality; affirmative action; anti-discrimination and equality law (**European Academy EURAC - Institute for Minority Rights**)
- It has very good use in our organizations. We circulate it to all members We will reference it more. (**European Council on Refugees and Exiles – ECRE**)
- By associated in the presentation of the report to the Press. (**European Jewish Congress**)
- Distribute the report during our activities. (**European Network on Independent Living**)
- EPA works closely with European institutions, particularly the European Parliament, academia, civil society, industries and think-tank/NGOs. EPA engages with policy-makers, industry, advocates, and the media, to bring forward new ideas and to propose policy frameworks to deal with pressing privacy issues as they arise. Therefore EPA can use Annual Report as reference for papers and/or mention it during discussion at international and European level. As EPA is a privacy forum dedicated, it can open a discussion and debate on Annual Report's topics. EPA can contribute by elaborating and publishing papers, engaging its network of experts and followers in workshops, roundtables and conference on FRA Annual Report's topics. EPA could also organize specific activities such as workshops or conferences. (**European Privacy Association**)
- FECRIS will inform its about 50 member organisations about the FRA Annual Report (**FECRIS**)
- Our organization could provide more information from Greece at the national level as a local point, FRA could reflect more from national levels while preparing Annual Report. (**Federation of Western Thrace Turks in Europe - ABTTF**)
- Envoyer des commentaires avant la publication officielle – notamment avec une indication de rapports utiles pour les références aux pratiques en France (**Forum réfugiés – Cosi**)
- Translate into Spanish (if we would have the budget). Including references to it during our presentations, training, publication, networks, website. (**Fundacion secretariado gitano**)
- The HFHR informed about the adoption of the report on its web page. We would refer

to the report in the articles, analysis and blog posts we are working on. **(Helsinki Foundation for Human Rights)**

- Provide the information that is needed about religious intolerance and discrimination, additionally to what can be found on our website. **(Human Rights Without Frontiers)**
- ILGA-Europe would be able to participate in targeted consultation in precise time frame ahead of the drafting of the report. **(ILGA-Europe)**
- We can discuss it. Personally we probably feel good will towards FRA and its reports based solely on the name. We are prepared to listen and entertain requests for action. **(IMPERO -Irish Mental Patients' Educational and Representative Organisation)**
- Faire connaître l'existence de ce rapport aux organisations locales intéressées. **(Institut culturel de Bretagne)**
- We could use more extensively the report in our work. **(Institut de Drets Humans de Catalunya)**
- It needs to be promoted and more widely disseminated **(International Federation of Social Workers - IFSW)**
- We would gladly promote it to our collaborators and at events we organise in Brussels or elsewhere such as the 5th Biennial Conference of the IJJO (November 6 and 7, 2012 in London, UK) or the Third Meeting of the European Council for Juvenile Justice (November 7 and 8, 2012 in London) **(International Juvenile Justice Observatory)**
- A more active connection to FRA and FRP should be **developed Istituto di Studi Giuridici Internazionali - Institute for International Legal Studies (CNR-ISGI)**
- Providing more information on national developments. **(Latvian Human Rights Committee)**
- LAW, with other NGOs involved in FRA, could give informations on legal system and practice in Italy concerning its areas of competence **(LAW, Legal Aid Worldwide)**
- Bring a more in-depth input as a stakeholder in the FRP **(Light For The World)**
- We circulate them as widely as possible, often by taking relevant extracts. **(National Secular Society)**

- The Annual Report could be integrated better into communication activities & in the preparation of the strategic plan. **(NLGF Ireland)**
- Serbian Democratic Forum can provide FRA with analysis and reports on human rights violations in Croatia especially in the area of minority rights and fight against discrimination. **(Serbian Democratic Forum)**
- Timely involvement in surveys, data gathering etc so that relevant data on topics that are being looked at by fra which impact the community are specifically addressed **(Sick Council UK)**
- See the comments before. The report is an important instrument in the field of human/fundamental rights. We would be interested to discuss both the outcomes and outlook with relevant stakeholders. **(UNITED for Intercultural Action)**
- Implement the visibility of the annual report through the direct communication channels, internal and external the NGO **(VIS – Volontariato Internazionale per lo Sviluppo)**
- Yad Vashem could make copies available at international conferences that it organizes. **(Yad Vashem)**

What could be done by the Fundamental Rights Platform:

- It would be nice to have a larger voice on the freedom of thought, conscience and religion at the Platform level. **(Alliance Defense Fund)**
- More discussion on the internal structure of the Report. **(ANTIGONE)**
- Rechercher les liens qui existent entre le rapport et les missions des organisations participant à la plateforme de l'Agence des Droits Fondamentaux et de les communiquer à ces organisations. Ces informations aideraient les organisations participant à la plateforme à mieux cibler leurs actions de proximité. **(Bretagne Réunion)**
- With the guidance and involvement of the FRA, Platform member organisations could develop, at local/national level, projects, activities, events, aiming at raising awareness on some specific issues related to human rights, using the Annual Report results as a main reference and a starting point for further debates. **(Centro di eccellenza Altiero Spinelli -CeAS)**
- Decide whether to have national focal points, as the national dimension is also important even if the FRA mandate is quite particular in this sense **(Comité Espanol de**

Representantes de Personas con Discapacidad - CERMI)

- Keep inviting and involving people with psychosocial disabilities and their organisations in the FRP work **(European Network of (ex) Users and Survivors of Psychiatry - ENUSP)**
- As I stated before, to work closer with NGOs who have gained expertise in their field of activities, which complements the work of the FRA. **(European Jewish Congress)**
- Distribute the results of the report by raising awareness of the issues from the different grounds of discrimination. **(European Network on Independent Living)**
- EPA works in improving and protecting citizens' right at every level by elaborating communication strategy at European and national level engaging its network of experts and followers in workshops, roundtables and conference. **(European Privacy Association)**
- It is ok to permit FECRIS to further present its ideas at "the floor is yours". **(European Federation of Centres of Research and Information on Sectarianism - FECRIS)**
- FRP could establish country groups and thus provide assistance to FRA in data collection from the national levels. **(Federation of Western Thracian Turks in Europe - ABTTF)**
- Contrast information **(Fundació Bayt al-Thaqafa)**
- Use it more often for advocacy, each NGO should disseminate it more often in their work. **(Fundacion secretariado gitano)**
- The FRP could discuss to a greater extent the needs on the content of the report. A session of the FRP annual meeting should be devoted to that. **(Helsinki Foundation for Human Rights)**
- Share their expertise and information **(Human Rights Without Frontiers)**
- Maybe prioritising. This whole area of psychiatry is crossing over into children in a big way now in intent, at least. Children are discriminated in the education as it is. If psychiatry gets its hooks into them? **(IMPERO - Irish Mental Patients' Educational and Representative Organisation)**
- The synergy between the FRP and all participant organizations should be improved for exchanging informations, good practices, etc. **(Istituto di Studi Giuridici Internazionali - Institute for International Legal Studies - CNR-ISGI)**

- Fundamental Rights Platform could create different section of working involving for each area all the competent NGO's involved (**LAW, Legal Aid Worldwide**)
- Allow ngo's to partner and contribute more to relevant topics in the report (**SIKH COUNCIL UK**)
- A mixture with both policy makers and politicians would make the platform perhaps even more interesting. (**UNITED for Intercultural Action**)
- Maybe think of a document in a language closer to non-experts to circulate it more widely and make it more accessible from civil society (**VIS – Volontariato Internazionale per lo Sviluppo**)
- It would be interesting, if possible, to receive some of the feedback of other organizations on this report - anonymously of course. (**Yad Vashem**)

What could be done by FRA:

- FRA has provided religious liberties organizations a wonderful platform with the Floor is Yours presentations. However I would like to see similar credence paid to freedom from discrimination based on religion and religious liberty in the thematic work of FRA. (**Alliance Defense Fund**)
- Réunir tous les parlementaires européens pour leur présenter le rapport ou à défaut une synthèse de celui-ci. (**Bretagne Réunion**)
- Translate the Report in more EU languages. (**Bulgarian Lawyers for Human Rights Foundation**)
- National events for presenting the main findings of the report before the relevant stakeholders, including the civil society and the media. (**Center for the Study of Democracy**)
- FRA could/should support/solicit promotional activities at local/national level, in collaboration with Platform member organisations, by developing projects, activities,

events, such as educational/training programmes, FR 'info-points'. **(Centro di eccellenza Altiero Spinelli - CeAS)**

- Be more grounded at national level, have while implementing researches and studies at national level first quality informants and not informants that have connections! This does not guarantee good information! **(Comitato per la promozione e protezione dei diritti umani)**
- Keep inviting and involving people with psychosocial disabilities and their organisations in the FRA work **(ENUSP)**
- This survey has made us look at the report more closely and use it more widely. although there are quite a few evaluations sent round by FRA, in this case it has been very useful. **(European Council on Refugees and Exiles)**
- To widen their reach of information to the European citizens at large. **(European Jewish Congress)**
- Poser des questions sur les differents thèmes aux participants à la plate-forme. **European muslim union**
- Contribute to an article for our web. **(European Network on Independent Living)**
- FRA could create the widest network of fundamental rights experts in Europe and it has links across Europe with public and private sector. **(European Privacy Association)**
- Seriously take into account the jeopardising of human rights by totalitarian movements. **(European Federation of Centres of Research and Information on Sectarianism - FECRIS)**
- Offering us a king of small information bits to be use in internet networks: small and easy messages (but good messages!!) **(Fundació Bayt al-Thaqafa)**
- FRA remains at a technical or theoretical level. There is a gap to reach (potential) victims, they do not know the report, which will be very useful. Victims could take advantage of the conclusions and data. **(Fundacion Secretariado Gitano)**
- Larger distribution among academics and national authorities, references to the report in other documents edited by FRA. FRA could consider organizing conferences (in 5-6 member states each year) in order to promote its activity and spread the work. The conferences could be organized by the support of local NGOs. **(Helsinki Foundation for Human Rights)**

- Create working groups for NGOs specialized about discrimination, border control and visas, etc. **(Human Rights Without Frontiers)**
- Well maybe get going on an understanding of the general ethics of discrimination and fundamental rights to explain in general terms how abuse of individuals and classes of persons arises. What motivates abuse? **(IMPERO - Irish Mental Patients' Educational and Representative Organisation)**
- Le rapport est un immense et excellent travail. Il doit être adressé à tous les organes nationaux concernés **(Institut culturel de Bretagne)**
- The FRA could take on board the comments that the FRP members make to the report. **(Institut de Drets Humans de Catalunya)**
- The practice of involving various partners (including civil societies organizations) dealing with the tasks of the FRA should be improved. **(Istituto di Studi Giuridici Internazionali - Institute for International Legal Studies - CNR-ISGI)**
- More time and efforts spent on analysing national situations. **(Latvian Human Rights Committee)**
- FRA could create more occasion of dialogue and meeting between NGO's involved **(LAW, Legal Aid Worldwide)**
- The annual report could have a short video version **(Mental Health Europe)**
- FRA should put more pressure on National authorities to acknowledge and use the Annual Report. **(Serbian Democratic Forum)**
- Take note of the matters raised by the platform and ensure dialogue even action has to be necessarily slow **(SIKH COUNCIL UK)**
- FRA is either the (natural) initiator of the above or may support NGO's who would like to set initiative like the above. **(UNITED for Intercultural Action)**
- Maybe think of a document in a language closer to non-experts to circulate it more widely and make it more accessible from civil society **(VIS - Volontariato Internazionale per lo Sviluppo)**

- As above, I noted that a short video overview of the report might be helpful. **(Yad Vashem)**

Please share with us any other feedback you may have:

- Members of the ECICW (European) as well as members of ICW (International) are very concerned with a backlash on the rights of women. Specifically reproductive rights. There is also concern on safeguarding cultural identities both by indigenous and immigrant populations in Europe while respecting international human rights rules as well as local traditions and legislation. At the Platform meeting it was obvious that the rights of the common man /woman are not at the center of interest. They were shadowed by the projection of the rights of various minorities. For example, at a seminar on school bullying, coordinators not only focused on the protection of LGBT youths which form only a small percentage of victims. The large proportion of other cases of bullying (disabled, ill, weak, short, ugly, myopic, intelligent, immigrants, poor achievers, newcomers, etc) were excluded from the discussion. **(European Centre of the International Council of Women)**
- Bretagne Réunie estime que la FRA n'est pas suffisamment visible dans le paysage français. Pourquoi ne pas réaliser une campagne de communication sur le territoire français (spots télévisuels, émissions télévisées sur les missions de la FRA...etc.) Réunir tous les parlementaires européens pour leur présenter le rapport ou à défaut une synthèse de celui-ci.
Bravo pour le focus ! Il clarifie à merveille le rôle des différentes institutions. Le rapport traite des 9 domaines que l'on peut qualifier de prioritaires du fait qu'ils touchent l'intégrité physique de nos concitoyens européens. Il met aussi en évidence l'urgence à changer les mentalités pour que notre continent reste progressiste. Ce rapport 2011 nous démontre que nos institutions se dotent, au fur et à mesure des années qui passent, des processus nécessaires à la réalisation d'une Europe véritablement « Humaine ». Je souhaite que la FRA intensifie ses efforts pour favoriser les interconnexions entre toutes les institutions depuis nos collectivités locales jusqu'aux Nations Unies afin d'accélérer les réformes que l'on trouve toujours trop longues à venir. J'encourage la FRA à mobiliser le parlement européen pour que celui-ci crée les outils juridiques contraignants nécessaires au respect du droit communautaire dans tous les Etats membres. Dans ce rapport, je regrette que la thématique « minorités nationales », dans sa dimension culturelle, ne soit pas abordée. En effet, dans certains pays de l'UE des politiques de substitution culturelles sont mises en œuvre. Certes ces politiques d'assimilation forcée peuvent paraître mineures au regard des thèmes abordés dans le rapport mais, il me semble que tous les citoyens européens ont le devoir d'exiger de leurs institutions européennes des améliorations notables dans tous les domaines qui contribuent à leur épanouissement... J'accepte volontiers l'urgence et donc la priorité mais je ne comprends pas, si c'est le cas, la hiérarchisation des « problèmes » à traiter dans

l'UE. L'urgence ne peut pas excuser l'immobilisme. Le traité de Lisbonne présente tout un « arsenal » pour préserver la diversité culturelle européenne et pourtant la France ne reconnaît toujours pas « sa » diversité. Madame la Vice-présidente de la Commission Européenne, Viviane REDING, nous a avoué son manque d'outils juridiques contraignants à l'encontre des nations bafouant le droit communautaire. Dans son rapport 2010, sauf erreur de ma part, la FRA souligne ce manque de moyen...Voici, à mon sens, pour la FRA, un axe de progression à ne pas abandonner. Par conséquent, j'encourage la FRA à mobiliser les parlementaires européens pour que ceux-ci créent les outils juridiques contraignants nécessaires au respect du droit communautaire dans tous les Etats membres. Félicitations et merci pour votre travail pertinent et permanent. Dans son travail quotidien, Bretagne Réunie ne manque pas une occasion de promouvoir la FRA. Paul LORET pour **(Bretagne Réunie)**

- Thanks for your work. It is very useful. However, it is necessary that your activities reach also the big part of European population, namely those persons that are not already interested in Human Rights or European topics and that may be more involved in every day violations of fundamental rights. **(Department of Political Science, Dispo - University of Genoa)**
- Congratulations for this excellent report. It is very relevant to tackle the situation of Roma in Europe, as the situation is very difficult now. We consider that FRA should keep including Roma issues in their reports, and we offer you our help and support. We offer you our reports on discrimination. For future work, you could take into account national reports of all countries involved, and also shadow reports and NGOs reports. **(Fundacion Secretariado Gitano)**