

MB DECISION

Decision n°:	2021/01
Subject:	Opinion of the Management Board on a new Multiannual Framework (2023–2027) for the Agency

THE MANAGEMENT BOARD OF THE EUROPEAN UNION AGENCY FOR FUNDAMENTAL RIGHTS

HAVING REGARD to the Council Regulation (EC) No 168/2007 of 15 February 2007 establishing a European Union Agency for Fundamental Rights (hereinafter referred to as the 'Agency'), and in particular Article 5 paragraph 1 thereof;

TAKING INTO ACCOUNT the results of a stakeholder consultation on the Multiannual Framework (MAF 2023-2027), carried out in January 2021 among a large number of civil society organisations and national human rights bodies throughout the EU Member States;

BUILDING ON the decision at the 35th MB meeting (December 2020) to adopt the Management Board opinion on the new MAF 2023-2027 by written procedure in February 2021,

WHEREAS: a written procedure was launched on 17 February 2021 to adopt the Opinion of the Management Board on a new Multiannual Framework (2023–2027) for the Agency in accordance with article 10 of the Agency's Rules of Procedure. The written procedure was concluded successfully on 24 February 2021.


HAS DECIDED AS FOLLOWS:

Article 1

To adopt the Opinion of the Management Board on a new Multiannual Framework (2023–2027) for the Agency as attached to this decision.

Done at Vienna, on 24 February 2021

For the European Union Agency for Fundamental Rights



Elise Barbé

Chairperson of the Management Board

Annex: Opinion of the Management Board on a new Multiannual Framework (2023–2027)

Vienna, 24 February 2021

Opinion of the Management Board of the EU Agency for Fundamental Rights on a new Multiannual Framework (2023–2027) for the agency

The work of the European Union Agency for Fundamental Rights (FRA) is based on Council Regulation 168/2007 of 15 February 2007 (hereafter the 'founding regulation')¹ and a multiannual framework (MAF).² Whereas the former defines its overall mandate, including its objective and tasks, the latter lists the thematic areas in which FRA should carry out these tasks, without prejudice to responses of the agency to requests from the European Parliament, the Council of the European Union or the European Commission outside these thematic areas, provided its financial and human resources so permit. The MAF is revised every five years. The current MAF is the third and covers 2018–2022.

Although some of the previous and current MAF areas have been phrased as 'rights' ('rights of the child', 'respect for private life'), the MAF is not a list of fundamental rights but a list of thematic areas to which all fundamental rights apply.³

It should be recalled that the MAF defines "the limits of the work of the Agency", which it can carry out on its own initiative.⁴ The MAF neither intends nor obliges the agency to dedicate equal attention and resources to all of the thematic areas in the MAF.

Areas in the MAF form those thematic fields on which the agency can work without the need for any request. That allows the agency to plan its activities, use its limited resources in the most rational way, and still be able to provide evidence-based advice, data and analysis as the need arises.⁵

According to Article 5 (1) of the founding regulation, the Commission must consult FRA's Management Board (MB) when proposing a new MAF. Although the MB would favour the revision of the current founding regulation in a way that does away with the need to adopt a MAF,⁶ this opinion provides recommendations by the MB in case the need to adopt a MAF remains.

¹ Council Regulation (EC) 168/2007 in Official Journal L 53 as of 22 February 2007.

² First MAF: Council decision of 28 February 2008 implementing Regulation (EC) No. 168/2007 as regards the adoption of a Multiannual Framework for the European Union Agency for Fundamental Rights for 2007–2012, [2008/203/EC](#); second MAF: Council decision of 11 March 2013 establishing a Multiannual Framework for 2013–2017 for the European Union Agency for Fundamental Rights, [No. 252/2013/EU](#); third MAF: Council decision of 7 December 2017 establishing a Multiannual Framework for the European Union Agency for Fundamental Rights for 2018–2022, [No. \(EU\) 2017/2269](#).

³ As the European Commission rightly stressed, the thematic areas listed in the MAF allow "the Agency to look into all fundamental rights problems that might arise within a given thematic area". See European Commission, Proposal for a Council decision implementing Regulation (EC) No. 168/2007 as regards the adoption of a Multiannual Framework for the European Union Agency for Fundamental Rights for 2007–2012, p. 7.

⁴ Recital 11 of the founding regulation, emphasis added. See also Art. 5 (3).

⁵ For examples of ad hoc reporting in reaction to a crisis see the [quarterly updates in the area of asylum and migration](#) or the [COVID bulletins](#).

⁶ See [COM\(2020\) 225 final](#), Proposal for a Council regulation amending Regulation (EC) No. 168/2007 establishing a European Union Agency for Fundamental Rights. The proposal envisages that the definition of the areas of the agency's activities will be based on the agency's multiannual programming document alone. The proposal thus aims to end the current approach of setting in parallel a broad thematic MAF every five

These recommendations are based on the agency's past institutional experience. They take account of external input by stakeholders as well as evidence from carrying out FRA projects and their results and impacts. The annex summarises the results of the consultation among stakeholders (286 responses, 150 of which were complete). Asked if the existing eight MAF areas should be kept, on average over 92 % said yes for all areas. The only MAF area that fewer than 90 % of the respondents argued for continuing was 'judicial cooperation except in criminal matters'. That is arguably because not many of the respondents are active in this area and because the current wording includes a limiting exception, which the stakeholders may perceive as unhelpful. Given the successful work of FRA in the existing MAF areas, the highly positive results of the second external evaluation⁷ and the strong support expressed by stakeholders, the MB strongly advocates a fourth MAF covering all current MAF areas.

When it comes to new thematic areas, more than two thirds of the respondents argued for extending the list of thematic areas in which the agency can become active on its own motion. The top-ranked areas were 'social inclusion, including social security, employment' (65 respondents) and 'media freedom and pluralism, disinformation' (61 respondents).

Considering all of the above, the MB argues for continuity with past MAFs and with earlier opinions⁸ of the MB on the MAF. Rather than proposing a major overhaul, the MB advocates a few key amendments to the current MAF to take account of the changed policy context for fundamental rights.

years, as it is redundant because the Agency has been adopting a multiannual programming document every year since 2017, to conform with Commission Delegated Regulation (EU) No. 1271/2013 (succeeded by Commission Delegated Regulation (EU) 2019/715). Based on the Union policy agenda and on stakeholders' needs, the multiannual programming document clearly sets out the areas and specific projects on which the agency is to work for a three-year period. This proposed approach is fully in line with the MB's 2017 decision on [Recommendations regarding changes in the Agency, its working practices and the scope of its mission](#) (adopted in response to the results of the second independent external evaluation of FRA). Recommendation no. 4 states: "The Multiannual Framework (MAF), as established in the Founding Regulation, should be removed. Constituting an anomaly compared to EU agencies, the provision to adopt every five years a Council decision on the basis of Article 352 of the TFEU (unanimity in Council, consent by the European Parliament) to define general 'thematic areas' has proven to be inefficient, institutionally cumbersome and redundant with the introduction of the 'Common Approach on EU decentralised agencies'. The procedures proposed by the Common Approach are far more efficient and allow for a true prioritisation taking due account of the Member States' views, and the orientations and priorities of the EU institutions."

⁷ Optimity (2017), [2nd independent External Evaluation of the European Union Agency for Fundamental Rights](#).

⁸ See, for example, [Opinion of the Management Board of the EU Agency for Fundamental Rights on a new Multi-annual Framework \(2018–2022\) for the agency](#), 12 February 2016.

1. Clarify the thematic area of 'judicial cooperation'

The fourth theme of the current MAF is described as “judicial cooperation, except in criminal matters”. The MB has stated before, and continues to believe strongly, that the exclusion of criminal matters is unwarranted and must be removed. The time when the Treaty of Lisbon was not yet in force and the EU had three separate pillars is long over. The preamble to the current MAF reflects this. Its third consideration refers to Union – not Community – law as the scope of the agency’s activities. Over the years, the EU has witnessed a remarkable increase in the importance of EU initiatives and EU legislation in the field of police and judicial cooperation in criminal matters. All of them have major fundamental rights implications. Given these developments, the demand for the agency’s contribution in this area has grown strongly over recent years following requests from EU institutions for expert input, for example specific research projects or legal opinions on proposed EU legislation.

In recent years the agency has often been requested to become active in the former third pillar. Thus it has become a recognised actor in the field, whose reports and opinions are frequently referred to.⁹

While the need to respect fundamental rights in the thematic areas of police and judicial cooperation has become widely recognised as a Union priority, the agency’s ability to fully contribute to this area with continued research and data collection, on its own initiative, should not be unduly limited to civil justice.

The European Parliament has repeatedly stressed that, as police and judicial cooperation in criminal matters has become standard EU policy, it should be explicitly included in the MAF for the FRA.¹⁰ The European Commission had included the former third pillar in its proposal for the current MAF, but the negotiations in the Council of the European Union led to criminal matters being explicitly excluded.¹¹ The Parliament, in the end, agreed to the Council decision (the legal basis of

⁹ For instance, the recently adopted [resolution on the implementation of the European Arrest Warrant](#) and the surrender procedures between Member States (2019/2207(INI)), 20.02.2021 (paras 28 and 34) the European Parliament uses and refers to the following FRA reports: ‘Rights in practice: access to a lawyer and procedural rights in criminal and European arrest warrant proceedings’, 13 September 2019; ‘Criminal detention conditions in the European Union: Rules and reality’, 11 December 2019; and ‘Criminal detention and alternatives: Fundamental rights aspects in EU cross-border transfers’, 9 November 2016. The Parliament also refers to the FRA database on criminal detention conditions, which was launched in December 2019, in i. The Council of the European Union welcomed this database warmly. It invited the agency “to regularly update this database in order to ensure that the information provided meets the requirements set out by the CJEU [Court of Justice of the European Union] and, in the medium term, to assess whether the database meets the needs encountered in practice” (Council of the European Union, 2020, Council conclusions [‘The European arrest warrant and extradition procedures – current challenges and the way forward’](#), 23 November 2020).

¹⁰ See, for example, the position of the Parliament on the adoption of the current MAF, European Parliament, [resolution of 1 June 2017](#) on the Multiannual Framework for 2018–2022 for the European Union Agency for Fundamental Rights.

¹¹ The same had happened with the previous MAF. The Council of the EU excluded judicial cooperation on criminal matters from the 2013–2017 MAF; the Commission had included this area in its 2011 proposal.

Article 352 TFEU requires consent by the Parliament). However, it noted that “The Rapporteur deeply regrets the lack of agreement in the Council as regards the inclusion of the thematic areas of police cooperation and judicial cooperation in criminal matters in the new MAF.” Including such matters in the MAF would “send a signal that EU [sic] cares about fundamental rights aspects of police and judicial cooperation, including in criminal matters, something that is wished for, and expected by both citizens and the human rights community as shown in the stakeholders consultation conducted by the Agency”.¹²

The fight against crime remains high on the EU agenda. The European Commission, for instance, is continuing to “strengthen the Security Union, notably by taking measures on tackling organised crime, countering hybrid threats, taking a new approach on counter-terrorism measures and radicalisation and improving the detection, removal and reporting of child sexual abuse online”.¹³

Against this background, the MB considers that the current MAF area ‘judicial cooperation, except in criminal matters’ needs to be replaced by ‘judicial and police cooperation’.

2. Add the thematic area of ‘social inclusion and protection; employment’

Including a specific MAF area on social inclusion could help operationalise the socio-economic rights under the EU Charter of Fundamental Rights, which are currently underused compared with other provisions of the Charter. This underuse is evident when looking at the statistics of the Court of Justice of the European Union case law, but also FRA’s data on the use of the Charter by national courts.¹⁴

Adding ‘social inclusion and protection; employment’ to the MAF areas would also respond to recent developments such as the adoption of the European Pillar of Social Rights and the upcoming European Commission action plan, which will aim to ensure the pillar’s full implementation and “contribute to socio-economic recovery and resilience in the medium and long-term, with a view to enhance social fairness of

¹² See the explanatory statement of the [European Parliament recommendation](#) on the draft Council decision establishing a Multiannual Framework for the European Union Agency for Fundamental Rights for 2018–2022 (14423/2016 – C8-0528/2016 – 2016/0204(APP)), 3 May 2017. Compare the [final European Parliament legislative resolution of 1 June 2017](#) on the draft Council decision establishing a Multiannual Framework for the European Union Agency for Fundamental Rights for 2018–2022 (14423/2016 – C8-0528/2016 – 2016/0204(APP)).

¹³ European Commission, Commission Work Programme 2021 – A Union of vitality in a world of fragility, [COM\(2020\) 690 final](#), 19 October 2020, p. 7.

¹⁴ European Commission, [2018 report](#) on the application of the EU Charter of Fundamental Rights, pp. 14, 15; FRA (2019), [Fundamental Rights Report 2019](#), p. 46.

the digital and green transitions”.¹⁵ An explicit focus on social inclusion is also in line with the European Commission priority to establish an “economy that works for people”.¹⁶ FRA’s specific fundamental rights approach and expertise, as well as existing cooperation arrangements between EU agencies would guarantee complementarity and synergies with other actors, for example other EU agencies such as the European Foundation for the improvement of living and working conditions or the European Labour Authority.

The European Parliament has in the past called for the addition of a MAF area on “extreme poverty and social exclusion”¹⁷ and called on the agency to work more “on the implications of extreme poverty and social exclusion in terms of access to and enjoyment of fundamental rights, bearing in mind that the fulfilment of the right to housing is critical for the enjoyment of a full range of other rights, including political and social rights”.¹⁸

The preamble to the current MAF already refers to the importance of the fight against poverty and social exclusion for the Union. It emphasises the need for the agency to “take into consideration the economic and social preconditions enabling an effective enjoyment of fundamental rights when collecting and disseminating data” (recital 8).¹⁹ Building on this, the MB finds that the time has come to include a specific MAF area on the fundamental rights aspects of social inclusion. Experience during the coronavirus crisis makes this point even stronger. The pandemic exposed gaps and limitations in the capacity and preparedness of our employment and social protection systems to deal with such a crisis and protect the most vulnerable. The EU’s fundamental rights body should be equipped with a solid mandate to deal with such issues on its own motion. After all, the pandemic is a litmus test of our readiness to respect the promise of Agenda 2030 to leave no one behind in the pursuit of a socially just transition to sustainable development.

The suggested MAF area would deal with the areas under the European Pillar of Social Rights: equal opportunities and access to the labour market (Chapter I), fair working conditions (Chapter II) and social protection and inclusion

¹⁵ European Commission, Commission Work Programme 2021 – A Union of vitality in a world of fragility, [COM\(2020\) 690 final](#), 19 October 2020, p. 4.

¹⁶ This is one of the six priorities of the European Commission 2019–2024. See in this regard European Commission, Communication – A strong social Europe for just transitions, Brussels, [COM\(2020\) 14 final](#), 14 January 2020. The communication includes five substantial chapters: ‘Reinforcing social Europe’, ‘Equal opportunities and jobs for all’, ‘Fair working conditions’, ‘Social protection and inclusion’ and ‘Promoting European values in the world’.

¹⁷ See amendment 15 in European Parliament legislative resolution of 17 January 2008 on the proposal for a Council decision implementing Regulation (EC) No. 168/2007 as regards the adoption of a Multiannual Framework for the European Union Agency for Fundamental Rights for 2007–2012 (COM(2007)0515 — C6-0322/2007 — 2007/0189(CNS)).

¹⁸ European Parliament, [Resolution of 14 September 2011 on an EU Homelessness Strategy](#) (B7-0475/2011), para. 15.

¹⁹ Council decision [2017/2269](#), 7.12.2017.

(Chapter III). To allow the agency to provide evidence and expertise in this context, the MB believes that a new MAF area entitled 'social inclusion and protection; employment' should be established.

3. Revise and widen the thematic area 'information society'

Given that the purpose of the MAF is to "determine" a list of "thematic areas ... within [which the] Agency shall carry out its tasks", it is misleading if the thematic areas coincide with specific fundamental rights.²⁰ Blurring the difference between rights and thematic areas risks diluting the important fact that the agency takes all fundamental rights into consideration when dealing with the various thematic areas listed in the MAF. Given that "respect for private life" (Article 7 of the Charter) and "protection of personal data" (Article 8 of the Charter) are not thematic areas but fundamental rights, they should not feature in the wording of the MAF.

Rather, the thematic area of 'information society' should be enlarged in line with the development in politics and policies over recent years. Against this background, the MB considers that the term 'information society' should be complemented with the term 'digitalisation'. Such a wider approach would reflect recent developments as well as the priorities of the European Commission, which aims for an inclusive digital society benefiting from the digital single market. Building smarter cities, improving access to e-government, e-health services and digital skills, and ensuring respect for the individual's informational autonomy are all aspects of digitalisation that require data and expertise across all fundamental rights.²¹ Including "digitalisation" in the thematic area will also allow the agency to address many important human rights aspects of new technologies. Artificial intelligence (AI) is a case in point here. It involves fundamental rights challenges far beyond the narrow remit of data protection. It is no coincidence that the full breadth of Charter provisions are considered when dealing with AI, as the recent Presidency conclusions 'The Charter of Fundamental Rights in the context of Artificial Intelligence and Digital Change' show.²²

Alongside digitalisation, the information society has had a major impact on how media operate. Parallel to this, problems with media pluralism and freedom of the media have moved from the periphery into the centre of the European Union's attention, as the Commission's first [rule of law report](#) shows. The [European Democracy Action Plan](#) adopted on 3 December 2020 has the ambition of improving the resilience of our democracies. It envisages EU actions in three major areas: the

²⁰ Art. 5(3) of the founding regulation, [No 168/2007](#), 15.2.2007.

²¹ "[A Europe fit for the digital age](#)" is one of the six priorities of the European Commission 2019–2024.

²² See Council of the European Union (2020), [Presidency conclusions – The Charter of Fundamental Rights in the context of Artificial Intelligence and Digital Change](#), 21 October 2020.

protection of election integrity and the promotion of democratic engagement;²³ strengthening media freedom and media pluralism;²⁴ and, finally, disinformation.²⁵ The Commission underlines that the gradual delivery of these measures will “ensure that Europe has a stronger democratic underpinning to take up the challenges of the unprecedented economic, climate and health crises we face, in full respect for our common principles and values”.²⁶ In this context, it will be helpful for the EU to allow FRA to collect relevant data continuously and provide expertise. Thanks to its past research on the rights of journalists²⁷ and regular data collection on civil society actors in the EU,²⁸ FRA has already developed relevant expertise that can support such endeavours.

Stakeholders support this thematic area especially strongly; see the results of the consultation in the annex. In response, and to allow the agency to provide further evidence and expertise in this context, the MB considers that the MAF area ‘information society and, in particular, respect for private life and protection of personal data’ should be retitled ‘information society, personal data; digitalisation; media freedom and pluralism; disinformation’.

4. Add the thematic area of ‘sustainable development’

Alongside a number of sectoral actions, in the years to come the EU will address sustainable development, including the protection of the environment, across all its policy areas.²⁹

To respond to current challenges, including climate change, and to deliver on its cross-cutting environment and sustainability obligations laid down in EU primary

²³ The subsections ‘Transparency of political advertising and communication’, ‘Clearer rules on the financing of European political parties’, ‘Strengthened cooperation in the EU to ensure free and fair elections’ and ‘Promoting democratic engagement and active participation beyond elections’ make up this first substantial chapter.

²⁴ The subsections ‘Safety of journalists’, ‘Fighting abusive use of strategic lawsuits against public participation’, ‘Closer cooperation to develop and implement professional standards’ and ‘Additional measures to support media pluralism’ make up this chapter.

²⁵ The subsections ‘Improving EU and Member State capacity to counter disinformation’, ‘More obligations and accountability for online platforms’ and ‘Empowering citizens to make informed decisions’ make up the third substantial chapter.

²⁶ European Commission, Communication on the European Democracy Action Plan, COM(2020) 790 final, 3.12.2020, p. 26.

²⁷ FRA (2016), [Violence, threats and pressures against journalists and other media actors in the European Union](#); FRA (2016), [Incitement in media content and political discourse in EU Member States](#).

²⁸ FRA (2020), [Civic space – experiences of organisations in 2019](#); FRA (2018), [Challenges facing civil society organisations working on human rights in the EU](#); FRA (2018), [Civil society space: Views of organisations – Conference paper](#).

²⁹ European Commission, Commission Work Programme 2021 – A Union of vitality in a world of fragility, [COM\(2020\) 690 final](#), 19 October 2020, p. 3.

law,³⁰ the EU legislature will have to put more emphasis on the fundamental rights dimension as grounded in Article 37 of the Charter (“A high level of environmental protection and the improvement of the quality of the environment must be integrated into the policies of the Union and ensured in accordance with the principle of sustainable development”). Equipping the EU legislature with specific fundamental rights expertise will add value when dealing with the areas of environment and sustainability.

In 2019 the agency underlined the close relationship between the UN sustainability goals and fundamental rights. It stressed that all Sustainable Development Goals (SDGs) have a direct or indirect fundamental rights dimension and all of them are interconnected. “Respecting and promoting fundamental rights, while promoting the SDGs and the overarching commitment to leave no one behind, requires expertise, as well as adequate and disaggregated data. Such data are not always available. Moreover, even when available, they are not always taken into consideration.”³¹ Against this background, if FRA engaged structurally with fundamental rights in the thematic areas of environment and sustainable development, it could add value to the work of the EU institutions and Member States. This is reinforced by the requirement to comply with the Charter to receive EU funding.

FRA is a member of the Platform on Sustainable Finance under the EU regulation establishing a framework to facilitate sustainable investment, and provides assistance and advice in that capacity.³² The EU is likely to need more and more advice on fundamental rights in the context of sustainability and the environment. The European Green Deal lays down the foundation for a set of deeply transformative policy interventions and is in itself an integral part of this Commission’s strategy to implement the UN’s Agenda 2030 and the SDGs.³³ It will be important that these policy interventions are fully in line with fundamental rights. Although the Green Deal states that the “European Pillar of Social Rights will guide action in ensuring that no one is left behind”,³⁴ it goes without saying that the Charter of Fundamental Rights – as the EU’s legally binding bill of rights – is of the utmost relevance in this regard. This normative frame should be supported with sufficient fundamental rights-specific data, evidence and expertise.

FRA’s specific fundamental rights approach and expertise, as well as existing coordination arrangements between EU agencies, would guarantee complementarity

³⁰ Art. 11 TFEU: “Environmental protection requirements must be integrated into the definition and implementation of the Union’s policies and activities, in particular with a view to promoting sustainable development.”

³¹ FRA (2020), [Implementing the Sustainable Development Goals in the EU: a matter of human and fundamental rights](#), p. 29.

³² See Art. 20 (1) (a) (iv) of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088.

³³ European Commission (2019), Communication – The European Green Deal, [COM\(2019\) 640 final](#), 11 December 2019.

³⁴ *Ibid.*, p. 4.

and synergies with other bodies (for example other EU agencies such as the European Environment Agency).

Against this background, the MB considers that the next MAF should contain a new MAF area, 'sustainable development'.

5. Add the thematic area of 'democratic participation'

The first MAF, 2007–2012, included a thematic area dealing with democratic participation. The European Commission's proposal in 2007 described the thematic area of "democratic participation of the citizens of the Union in the Union's democratic functioning" as being about "the Union's citizens' right to participate in local elections and the European Parliament elections."³⁵ The theme, therefore, covered democratic participation both at the level of the Union and in the Member States.

Given that the second and third MAFs no longer included this thematic area, in recent years the agency has dealt with questions of democratic participation and the related citizens' rights only in connection with other MAF areas. Most prominently, FRA conducted research on the right of persons with disabilities to vote.³⁶

However, the question of the functioning of democratic participation has moved increasingly into the centre of the EU institutions' attention, as the European Democracy Action Plan adopted on 3 December 2020 testifies. The Commission underlines that the gradual delivery of these measures will "ensure that Europe has a stronger democratic underpinning to take up the challenges of the unprecedented economic, climate and health crises we face, in full respect for our common principles and values".³⁷ For 2021, the Commission announced clearer rules on the financing of European political parties, and EU action to ensure greater transparency in paid political advertising. Moreover, the Commission aims to improve the electoral rights of Europeans exercising their free movement rights and take action to protect journalists and civil society from strategic lawsuits against public participation.

Reintroducing a MAF area on democratic participation would increase the space for the agency to engage with fundamental rights challenges surrounding political participation in the EU and its Member States.

Against this background, the MB believes that it will be important for the new MAF to include the thematic area of 'democratic participation'.

³⁵ European Commission, Proposal for a Council decision implementing Regulation (EC) No. 168/2007 as regards the adoption of a Multiannual Framework for the European Union Agency for Fundamental Rights for 2007–2012, [COM\(2007\) 515 final](#), 12.9.2007, p. 7.

³⁶ See FRA (2019), [Who will \(not\) get to vote in the 2019 European Parliament elections?](#); FRA (2014), [The right to political participation of persons with disabilities – Summary](#); FRA (2010), [The right to political participation of persons with mental health problems and persons with intellectual disabilities](#); FRA (2012)

³⁷ European Commission, Commission Work Programme 2021 – A Union of vitality in a world of fragility, [COM\(2020\) 690 final](#), 19 October 2020, p. 7.

6. Rephrasing of current thematic areas where necessary

(a) Victims of crime and access to justice

The “and” connection between these two thematic areas can lend itself to a restrictive reading. The current wording, “victims of crime and access to justice”, could be read as one single thematic area, dealing with victims only when they are accessing justice, and/or as dealing with access to justice only in the context of victims. Victim’s rights, however, go beyond judicial proceedings and cover, for instance, “integrated and targeted support to victims with special needs, such as child victims, victims of gender-based or domestic violence, victims of racist and xenophobic hate crime, LGBTI+ [lesbian, gay, bisexual, trans, intersex and other] victims of hate crime, elderly victims and victims with disabilities”.³⁸ Similarly, access to justice goes beyond criminal law and covers, for instance, business and human rights. Therefore the “and” connection should be replaced by a semicolon, ‘;’.

Moreover, the current wording “access to justice” emphasises the demand side whereas human rights law equally addresses the supply side, i.e. full and effective judicial protection. According to Article 47 of the Charter, Member States must allow for “fair and public” hearings within a “reasonable time” by “independent and impartial” tribunals established by law, and must provide the possibility of being “advised, defended and represented”, just as legal aid “shall be made available to those who lack sufficient resources” as necessary. Referring to Article 19(1) TEU, the Court of Justice has held that Member States are to provide remedies sufficient to ensure effective judicial protection for individual parties in the fields covered by EU law.³⁹

Against this background, the wording of this MAF area should more clearly signal that the agency deals with both the demand and supply sides of judicial protection, as well as non-judicial forms of access to justice (national human rights institutions, equality bodies, ombudsmen, redress schemes etc.). Therefore the MB considers that the thematic area should read ‘victims of crime; access to justice and effective judicial protection’.

(b) Migration, borders, asylum and integration of refugees and migrants

To avoid a restrictive reading of the currently combined MAF areas, the current MAF area ‘migration, borders, asylum and integration of refugees and migrants’ should

³⁸ European Commission (2020), Communication – EU Strategy on victims’ rights (2020–2025), [COM\(2020\) 258 final](#), 24 June 2020.

³⁹ The need for “effective judicial protection” was acknowledged early on as a fundamental principle of Community law (see, for example, Case 222/84, *Johnston*, 15 May 1986, para. 19), and it has continued to take a central position in the case law of the CJEU to this very day (e.g. Case C-64/16, *ASJP*, 27 February 2018, para. 34).

be split into two separate areas: 'visas, border management, asylum and migration' and 'integration and social inclusion of refugees and migrants'.

The use of the more modern term 'border management' (instead of simply 'borders') would reflect the area as it has developed over time in the relevant EU policy documents. The addition of 'visas' to borders and asylum reflects past and future FRA work in the areas of interoperability and information technology (IT) systems, and goes back to the wording used in both the first⁴⁰ and second⁴¹ MAFs. The MB therefore holds that the current wording should be replaced with 'migration, border management, asylum, visa; integration and social inclusion of refugees and migrants'.

(c) Rights of the child

Given that Article 24 of the Charter has exactly the same wording, and considering that the impression of rights coinciding with thematic areas should be avoided (see Section 3 above), the MB thinks that the current wording should be replaced with '**children and their best interests**'.⁴²

(d) Integration and social inclusion of Roma

To reflect the thematic area and the related policy responses as they have developed over recent years, 'integration and social inclusion of Roma' should be replaced with 'Roma equality, inclusion and participation'. Such a rewording would stress the participatory dimension of every engagement in this field. It would also reflect the three pillars of the new EU Roma Strategic framework as adopted at the beginning of October 2020.⁴³ The MB therefore recommends that the current wording be replaced with 'Roma equality, inclusion and participation'.

7. Stress cross-cutting obligations and activities in the preamble of the MAF; underline that the agency is neither obliged nor expected to deal with all thematic areas to the same extent; stress the relevance of the Charter

The preamble of the MAF should provide some important contextual information that will help to better understand the normative environment in which the agency carries out its work in the thematic areas listed.

⁴⁰ Art. 2 (f): "visa and border control".

⁴¹ Art. 2 (h): "immigration and integration of migrants, visa and border control and asylum".

⁴² This change would also do away with the current focus on protection. Given that the agency looks into all fundamental rights aspects of the MAF areas, this thematic area is equally about the fundamental right to participation etc.

⁴³ European Commission, Communication – A Union of Equality: EU Roma strategic framework for equality, inclusion and participation, [COM\(2020\) 620 final](#), 7 October 2020.

Firstly, the preamble should stress that the different areas are not to be read in isolation but form a network and are often interrelated (for instance access to justice and the information society). At the same time it is of key importance that the preamble underline that the agency is neither obliged nor expected to deal with all thematic areas to the same extent. The MAF defines “the limits of the work of the Agency”, which it can carry out on its own initiative.⁴⁴ The MAF does not oblige FRA to dedicate equal attention and resources to all of the thematic areas it lists. It is up to the MB to design the specific allocation of resources and attention among the thematic areas that the Council defines.

Secondly, like the first MAF,⁴⁵ the preamble of the fourth MAF should explicitly recall that, in line with its founding regulation, the agency engages in prominent activities that cut across various if not all MAF areas. The preamble should refer to such activities, for instance its communication strategy or activities related to FRA’s special role under the UN Convention on the Rights of Persons with Disabilities (CRPD).

Thirdly, adding new thematic areas comes with the need for the preamble to underline the need to guarantee synergies and avoid overlap. The current MAF includes in its preamble a paragraph that not only refers to the Council of Europe but also lists 11 EU bodies whose work is important to consider to make sure that they are complementary.⁴⁶ In the current thematic areas the agency guarantees complementarity by a considerable amount of formal and informal coordination and cooperation with other actors. Given that the MB believes that new thematic areas such as ‘sustainable development’ (which includes the environment) and ‘social inclusion and protection; employment’ should be added to the MAF, the relevant bodies should be added to the corresponding paragraph in the MAF. This would need to include, for instance, the European Environment Agency and the European Labour Authority.

Fourthly, the preamble should stress the importance of the Charter of Fundamental Rights. When the European Commission proposed to set up FRA, the Charter’s status was that of a political declaration. The Commission stressed that there was “a broad

⁴⁴ See recital 11 and Art. 5(3) of the founding regulation.

⁴⁵ See recital 7 of Council decision of 28 February 2008 implementing Regulation (EC) No. 168/2007 as regards the adoption of a Multi-annual Framework for the European Union Agency for Fundamental Rights for 2007–2012, [2008/203/EC](#) (emphasis added): “This Framework defines the precise thematic areas of the work of the Agency, **whereas several permanent tasks of the Agency are determined in Article 4 of Regulation (EC) No 168/2007, *inter alia***, the task of raising the awareness of the general public about their fundamental rights and about active dissemination of information about the work of the Agency.”

⁴⁶ Recital 6 of the current MAF lists the European Asylum Support Office (EASO); the European Border and Coast Guards Agency (Frontex); the European Migration Network; the European Institute for Gender Equality (EIGE); the European Data Protection Supervisor (EDPS); the European Union Agency for Network and Information Security (ENISA); Eurojust; the European Police Office (Europol); the European Union Agency for Law Enforcement Training (CEPOL); the European Foundation for the improvement of living and working conditions (Eurofound); and the European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice (eu-LISA).

consensus in considering that the Charter should be the point of reference for the mandate of the Agency” and that establishing FRA “will make the Charter more tangible”.⁴⁷ The European Commission strategy on the application of the Charter, adopted in December 2020, reaffirms its importance: “Proclaimed 20 years ago and legally binding since 2009, the EU Charter of Fundamental Rights (‘the Charter’) was a quantum leap for European integration. [...] Over the past decade, the Charter has led to a greater promotion and protection of people’s fundamental rights in the EU.”⁴⁸ References to the Charter could be related to Article 4 (1) (h)⁴⁹ and recitals 2⁵⁰ and 9⁵¹ of the founding regulation. At the same time, the preamble should refer to the European Convention on Human Rights (ECHR) and the case law of the European Court of Human Rights,⁵² mention the relevance of the European Social Charter and draw attention to the fact that many other conventions as well as soft law measures of the Council of Europe form important contributions to the fundamental rights landscape of Europe. Moreover, it should mention that the constitutional traditions common to the Member States and relevant international agreements also remain key legal sources for the Union, including the agency.

Conclusion: proposals for the MAF 2023–2027

The MB believes that a Council decision on the fourth MAF of the agency should lead to the following five changes.

1. Stress in the preamble:
 - a. that the agency is neither obliged nor expected to deal with all thematic areas to the same extent;

⁴⁷ European Commission, Proposal for a Council Regulation establishing a European Union Agency for Fundamental Rights, [COM\(2005\)0280 final](#), 30 June 2015, pp. 4 and 2.

⁴⁸ European Commission (2020), Communication – Strategy to strengthen the application of the Charter of Fundamental Rights in the EU, [COM\(2020\) 711 final](#), 2 December 2020, p. 1.

⁴⁹ FRA should “develop a communication strategy and promote dialogue with civil society, in order to raise public awareness of fundamental rights and actively disseminate information about its work.”

⁵⁰ “The Charter of Fundamental Rights of the European Union, bearing in mind its status and scope, and the accompanying explanations, reflects the rights as they result, in particular, from the constitutional traditions and international obligations common to the Member States, the Treaty on European Union, the Community Treaties, the European Convention for the Protection of Human Rights and Fundamental Freedoms, the social charters adopted by the Community and by the Council of Europe and the case law of the Court of Justice of the European Communities and of the European Court of Human Rights.”

⁵¹ “The Agency should refer in its work to fundamental rights within the meaning of Article 6(2) of the Treaty on European Union, including the European Convention on Human Rights and Fundamental Freedoms, and as reflected in particular in the Charter of Fundamental Rights, bearing in mind its status and the accompanying explanations. The close connection to the Charter should be reflected in the name of the Agency.”

⁵² Note in this regard that the European Court of Human Rights and the CJEU take each other’s case law into account. Article 52 (3) of the Charter lays down this interplay between the two courts, requiring those interpreting the Charter to fully acknowledge the ECHR and the relevant case law. At the same time, the European Court of Human Rights increasingly takes inspiration from the wording of the Charter when interpreting the ECHR. Note that [Charterpedia](#) captures the most relevant ECtHR judgments using the Charter.

- b. the importance of the cross-cutting obligations and activities of the agency;
 - c. the need to avoid any overlaps with the work of other bodies, especially in those areas that are added to the MAF;
 - d. the importance of the EU Charter of Fundamental Rights and the standards developed in the Council of Europe.
2. Rephrase the current thematic area 'judicial cooperation, except in criminal matters' as 'judicial and police cooperation', to explicitly include the former third pillar, and rephrase the wording of other areas where necessary to take into account policy developments that have taken place over the last decade.
 3. Revise and widen the thematic area 'information society and, in particular, respect for private life and protection of personal data' to become 'information society; personal data; digitalisation; media freedom and pluralism; disinformation'; and revise the thematic area 'victims of crime and access to justice' to include the complementary notion of effective judicial protection.
 4. Reintroduce the thematic area 'democratic participation', which was included in the first MAF.
 5. Add two new thematic areas: 'social inclusion and protection; employment' and 'sustainable development'. Introducing new thematic areas does not create an obligation for the agency to be active in these fields every year, but it implies greater priority for its activities and coordination with those already active in the relevant areas.

The table below provides the precise wording the MB proposes for the list of thematic areas in the next MAF. As far as possible, the proposals retain the wording of the current MAF. The sequence of thematic areas also follows the current MAF.

<i>Current MAF 2018–2022</i>	<i>Future MAF 2023–2027</i>
<i>10 recitals on nature of MAF, how it relates to EU priorities and FRA's resources, the complementarity between FRA's work and other bodies, the use EU institutions can make of the agency's expertise etc.</i>	<p><i>Add recitals addressing the following:</i></p> <ul style="list-style-type: none"> <i>a. that the agency is neither obliged nor expected to deal with all thematic areas to the same extent;</i> <i>b. cross-cutting obligations and activities of the agency;</i> <i>c. the need to avoid any overlaps with the work of other bodies, especially in those areas that are added to the MAF;</i> <i>d. the special relevance of the EU Charter of Fundamental Rights and the importance of the standards developed</i>

	by the Council of Europe, primarily in the ECHR and the case law of the European Court of Human Rights but also other conventions such as the European Social Charter.
<p>"Article 2</p> <p><i>Thematic areas</i></p> <p><i>The thematic areas shall be the following:"</i></p> <p>Underline that the thematic areas cover only the fundamental rights-relevant aspects of the areas listed in the MAF.</p>	<p>"Article 2</p> <p><i>Thematic areas</i></p> <p><i>The thematic areas cover all fundamental rights-relevant aspects of the following themes:"</i></p>
<p>(a) <i>victims of crime and access to justice</i></p> <p>Replace "and" with ";" and complement with "effective judicial protection".</p>	<p>(a) <i>victims of crime; access to justice and effective judicial protection</i></p>
<p>(b) <i>equality and discrimination based on any ground such as sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation, or on the grounds of nationality</i></p> <p>Keep unchanged.</p>	<p>(b) <i>equality and discrimination based on any ground such as sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation, or on the grounds of nationality</i></p>
<p>(c) <i>information society and, in particular, respect for private life and protection of personal data</i></p> <p>Reword to avoid 'rights language' and add digitalisation, media freedom, pluralism and disinformation.</p>	<p>(c) <i>information society; personal data; digitalisation; media freedom and pluralism; disinformation</i></p>
<p>(d) <i>judicial cooperation, except in criminal matters</i></p> <p>Delete exception of criminal matters and add police cooperation.</p>	<p>(d) <i>judicial and police cooperation</i></p>

<p>(e) <i>migration, borders, asylum and integration of refugees and migrants</i></p> <p>Reintroduce visas and adapt language to developments in policy context.</p>	<p>(e) <i>migration, border management, asylum, visa; integration and social inclusion of refugees and migrants</i></p>
<p>(f) <i>racism, xenophobia and related intolerance</i></p> <p>Keep unchanged.</p>	<p>(f) <i>racism, xenophobia and related intolerance</i></p>
<p>(g) <i>rights of the child</i></p> <p>Reword to avoid 'rights language'. That the area is about more than just protection should be clear from the rephrased first sentence in the article, which stresses that FRA would deal with all fundamental rights-relevant aspects of the thematic areas listed.</p>	<p>(g) <i>children and their best interests</i></p>
<p>(h) <i>integration and social inclusion of Roma</i></p> <p>Adapt language to developments in policy context.</p>	<p>(h) <i>Roma equality, inclusion and participation</i></p>
<p>New thematic area.</p>	<p>(i) <i>social inclusion and protection; employment</i></p>
<p>Reintroduce old thematic area listed in first MAF.</p>	<p>(j) <i>democratic participation</i></p>
<p>New thematic area.</p>	<p>(k) <i>sustainable development</i></p>

ANNEX: Summary of results of stakeholder consultation (21 December 2020 to 15 January 2021)

Introduction

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Questionnaire

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Introduction

The FRA's Multi-Annual Framework 2018–2022 is coming to an end and a **new proposal for thematic areas** will be submitted to the Justice and Home Affairs Council of the European Union, on proposal of the European Commission and after consulting the European Parliament in 2021. In order to guide the proposal preparation for the MAF 2023–2027, the FRA have decided to consult their stakeholders asking them specific questions in an online questionnaire.

The aim of this survey is to capture an overview of a variety of stakeholders' views on the current relevance of the 8 thematic areas. Furthermore, this survey can bring to light new themes of relevance for the 5 years to come, or a different grouping of some thematic areas together.

Questions in the survey

The survey asks six questions. The first three questions are general questions on the participants whereas the last three questions concern the current and future MAF thematic areas.

The questions related to the MAF are quantitative:

- Do you consider that each of the following areas which are currently part of the MAF should remain MAF areas?
- In your view should new thematic areas be added in the new MAF?
- The thematic areas provided below are examples based on earlier proposals by the Management Board, however, we kindly ask you to identify any other thematic areas that you consider of major importance for the FRA.

Although the questions are closed and allow only for a quantitative study, all questions have a section for comments, which allows a qualitative analysis as well. Furthermore, at the end of the questionnaire, there is room for general comments.

Target groups

The questionnaire is initially targeted at four groups:

- **the Fundamental Rights Platform**
- **the national human rights bodies** , i.e. the equality bodies, national human rights institutions (NHRIs) and ombudsmen
- **judiciary networks**
- **academia.**

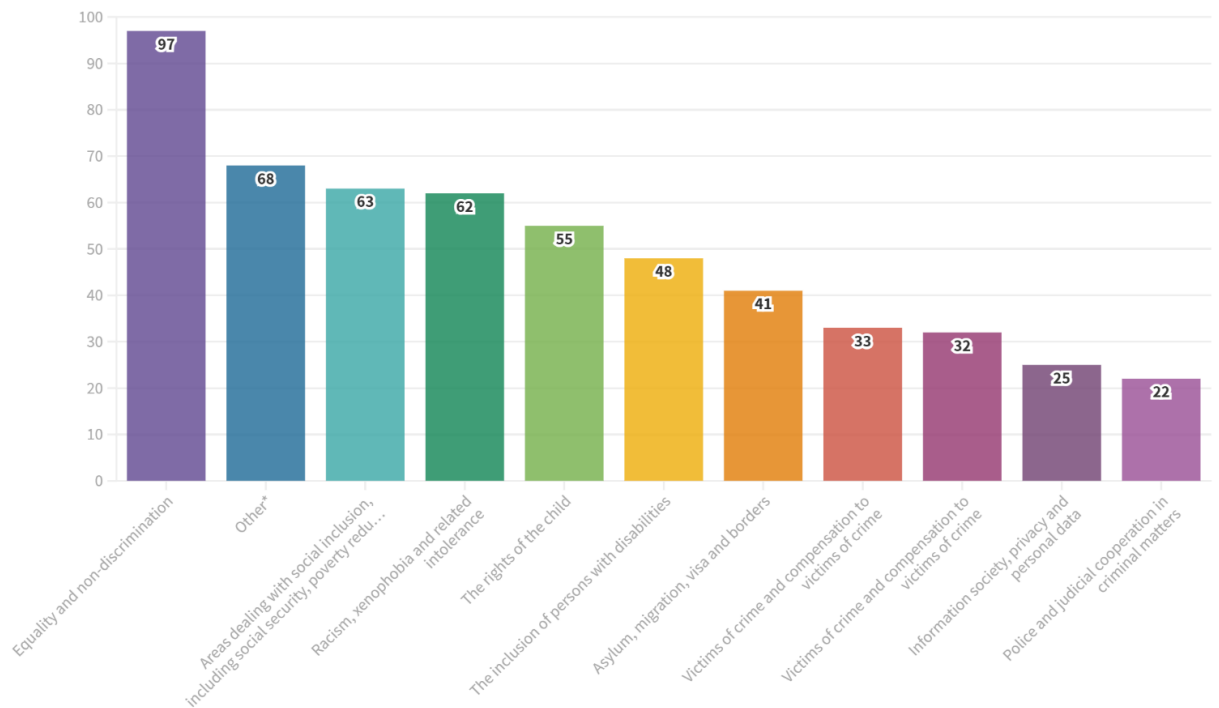
Timeline

The first email was sent out on 14 December 2020. A reminder email was sent out on 11 January 2021. The deadline to complete the questionnaire was 15 January 2021.

Results

In total 286 responses were entered in the database. The results are based on **150 complete responses** (fully submitted); 136 incomplete (draft) responses have not been considered. An exhaustive list of the organisations identified is at the end of this document.

What is the main area of the organisation's work?

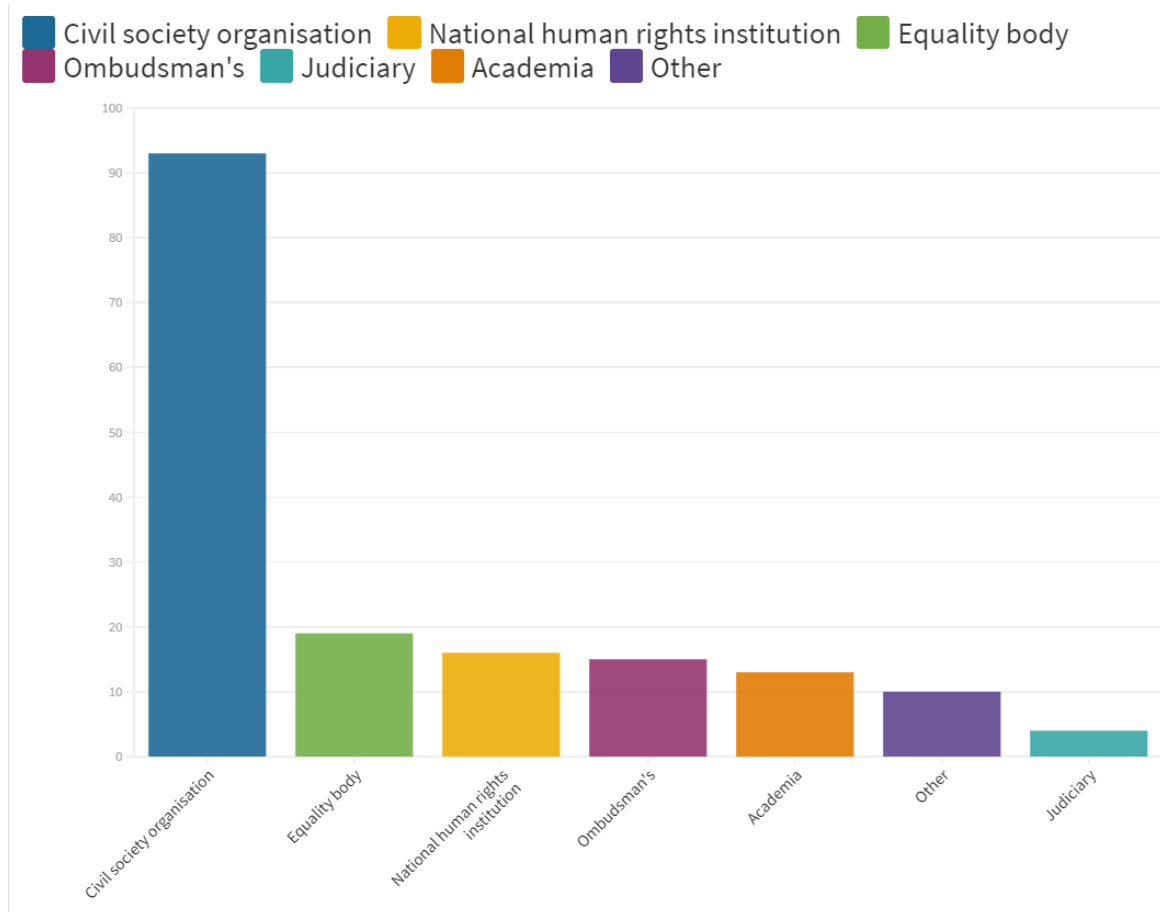


*Other areas of the organisation's work indicated by stakeholders:

- LGBTI [lesbian, gay, bisexual, trans and intersex] (5)
- Women's rights during and after pregnancy, eradication of obstetric violence against women, their children and families
- Protection and prevention of human rights and freedoms
- Hate speech/hate crimes
- Religious discrimination and intolerance
- Fundamental rights of persons under criminal investigation, suspects, accused and convicted persons
- Social prevention of Serious and Organised Crime [SOC] and support of SOC victims
- Citizenship, Public Liberties, Democracy, ...
- Digitalisation and human rights
- Gender equality
- Rule of law (3)
- Social rights (education, housing, health, care homes) and environmental rights
- European citizenship (2)
- Prisoners' rights
- The typical Ombudsman's areas of work
- Equality and non-discrimination of persons with disabilities
- Health and Environmental Justice
- NHRIs
- International development and humanitarian aid
- Human rights (3)
- International cooperation

- Rights of older persons, gender equality and gender-based violence
- Child protection (including missing)
- Criminal Law and Procedure
- Development
- 'Regional'/minorities language protection and revitalisation, discrimination, language rights
- Memory Education, Trainings for (education) professionals
- Civic activism
- Apoio a PVVIH e combate ao estigma à discriminação
- Labour market and employment policy, Education
- Right to health
- Education (human rights education) (3)
- Security and human rights, policing, detention and human rights (4)
- Political
- Issues within religious groups
- Freedom of expression
- Freedom from torture and protection of human rights defenders
- Democracy & Human Rights Education
- The rights of homeless people
- Promoting Gender Equity in Health
- Torture Prevention, Rule of Law, Procedural Rights, International Criminal Law
- Human Rights [HR] and Business; HR and Environment; HR and AI
- Human rights of older persons, human rights education
- Trafficking in Human Beings, Bioethics
- Good administration
- Women's rights
- Children and young people formal education and housing
- Rights of the child only regarding disability issues
- General competence to promoted and protect all rights of citizens before public authorities
- Advocation and services to undocumented migrants
- Right to freedom of association, trade union rights, right to freedom of expression, political rights, social rights
- Sexual and Reproductive Health and Rights, Women's Human Rights, Gender Equality
- ROMA

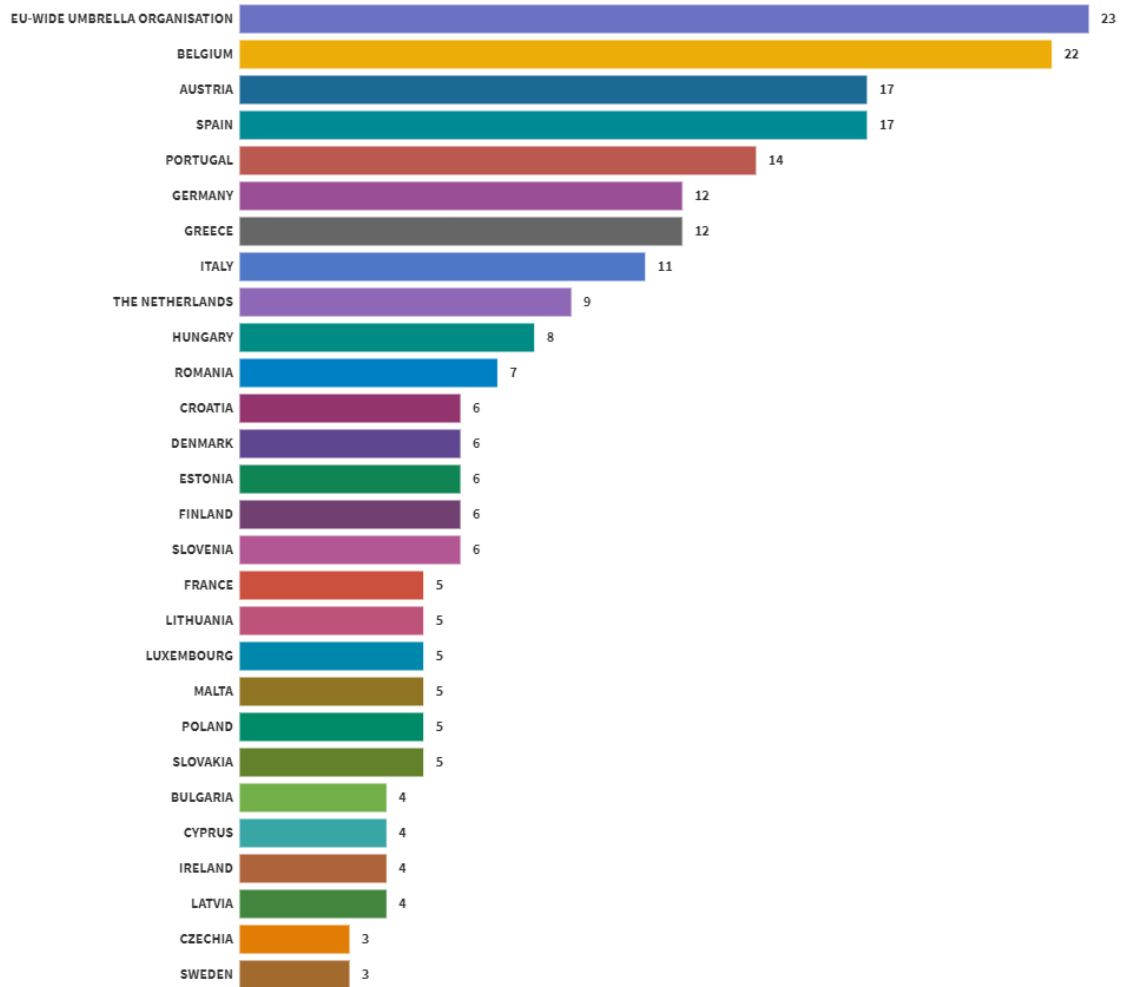
What type of organisation?



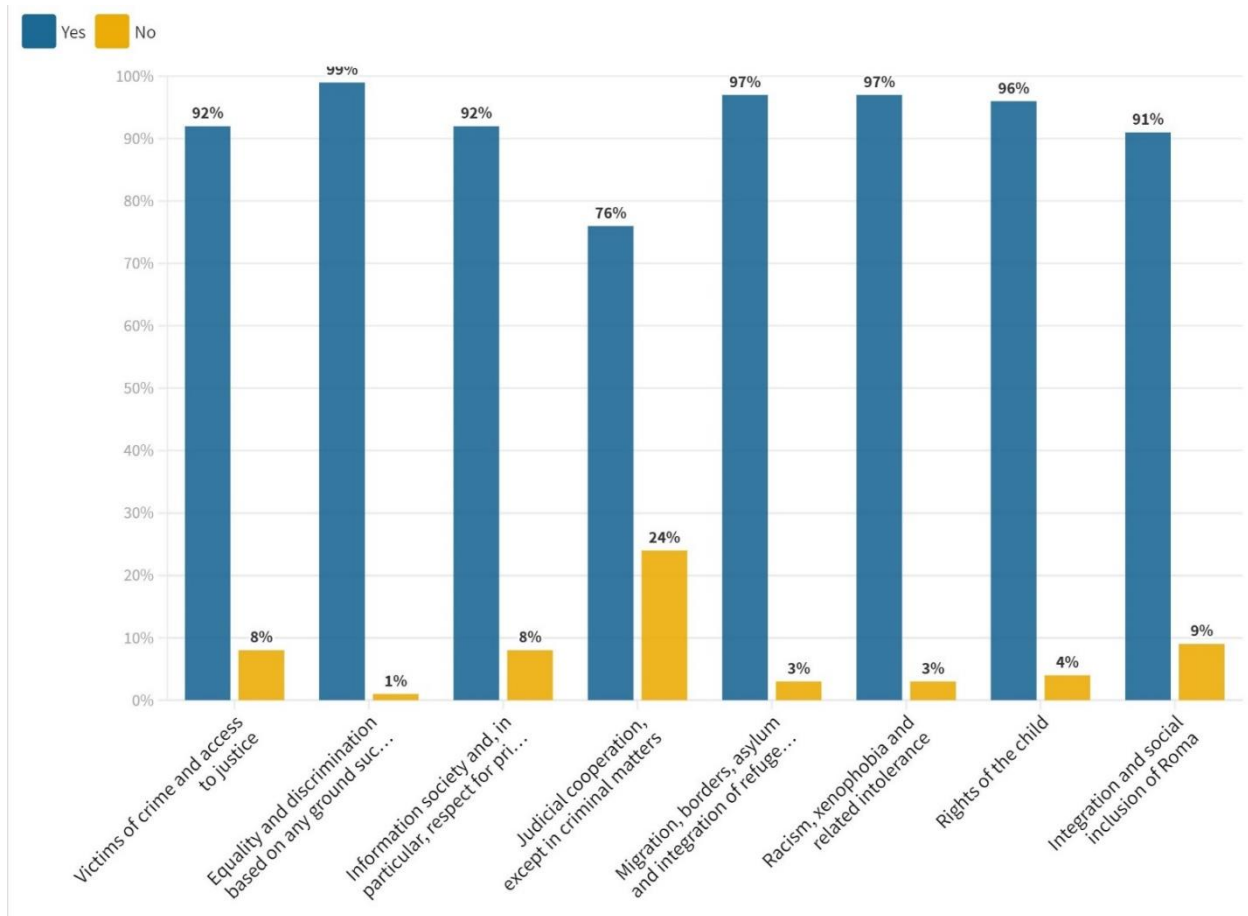
*Other includes:

- Independent organisation of specialist defence lawyers in all Council of Europe countries
- N.G.O.-N.P.O. [non-governmental organisation/non-profit organisation] (2)
- Commission
- Foundation
- Social inclusion volunteers' NGO
- State Social Research Centre
- Humanitarian and Independent Institutions
- Trade Union

In which EU Member State are you based?



Do you consider that each of the following areas which are currently part of the MAF should remain MAF areas? (1/2)



Do you consider that each of the following areas which are currently part of the MAF should remain MAF areas? (2/2)

COMMENTS FOUND UNDER EACH CURRENT THEMATIC AREA

<p>Judicial cooperation, except in criminal matters</p> <ul style="list-style-type: none"> • EU FRA should continue working on judicial cooperation in criminal matters as well as on access to justice, including procedural safeguards and other policies relating to EU criminal law and procedures.
<p>Information society and, in particular, respect for private life and protection of personal data</p> <ul style="list-style-type: none"> • Personal data and information protection is underdeveloped and needs especially efforts. Also there is much to do improve the non-discrimination of Roma. Discrimination, hate crimes, racism are topics Europe needs to be vigilant on. I'm worried with the failed inclusion of these topics in educational systems and the state of democracy and human rights education in teacher education and educational institutions in general. • I know less about the work of the FRA on these topics: Information society and, in particular, respect for private life and protection of personal data and Judicial cooperation, except in criminal matters. I think there are a lot of other topics that could be categorised differently and more broadly, especially considering the impacts of COVID on many different population groups. But in general, I think all the topics I marked are still important and highly problematic issues in the EU. • Information society should remain a priority, but span beyond private life and data protection in order to cover different facets of fundamental rights challenges in the context of digitalisation. • en el apartado de la sociedad de la información podría incluirse el impacto de la inteligencia artificial sobre los derechos fundamentales.
<p>Equality and discrimination based on any ground such as sex, race, colour, ethnic or social origin</p> <ul style="list-style-type: none"> • The area of equality and discrimination should be more disaggregated, as each area of discrimination that is mention[ed] would need more attention and in-depth work. As of now only race, nationality and ethnicity are treated individually and given sufficient attention. For the formulation of the next MAFs a balance between all the protected characteristics would be wishful. • The majority of above-selected issue areas are either directly or indirectly related to matters of discrimination and equal treatment which represent the core areas of activity for our organisation (victims of crime, equality/non-discrimination, information society, racism/xenophobia, Roma rights). We find particularly important the links between issue areas which expose new challenges in our field of work – e.g. the links between equality/non-discrimination, information society and racism/xenophobia issue areas (such links expose particular issues such as discrimination though the use of artificial intelligence; online hate speech, etc.). Our organisation values FRA's work in all these areas as it represents the source of important (national as well as comparative) data in specific fields of our work. • Equality and discrimination is not easily separable from racism, xenophobia and related intolerance, there is a continuum between prejudice, discrimination and hate crimes, a more integrated approach would be better. • It is very important to ensure access and enjoyment of the fundamental rights of vulnerable groups such as people with disabilities. Thus, equality and non-discrimination and compliance with human rights treaties must be ensured. • Increasing rejection by certain EU MS [Member States] of the core principles of equality and non-discrimination means that protection of these rights must remain a key priority for FRA, especially in the area of disability rights and inclusion. Likewise, access to justice is increasingly under threat as States undermine the integrity of national legal systems and FRA's work in this area is crucial in combating this. • Yes, but why is there a pillar on equality and non-discrimination (which should encompass all areas of inequalities and discrimination); and then specific focuses on migrants, people with disability, racism, Roma, and rights of the child? • The area 'equality and discrimination' should also cover gender identity and variations in sex characteristics, and cover intersections (such as age and sexual orientation, gender identity and variations in sex characteristics).

Racism, xenophobia and related intolerance

- What is different Equality ... and Racism ... What is the difference between these points, at the moment they duplicate each other?
- Racism and xenophobia must remain priorities, but other forms of intolerance and hate speech, such as those based on ageism must also be covered in FRA's work.
- el apartado de racismo podría incluirse en igualdad y discriminación.

Integration and social inclusion of Roma

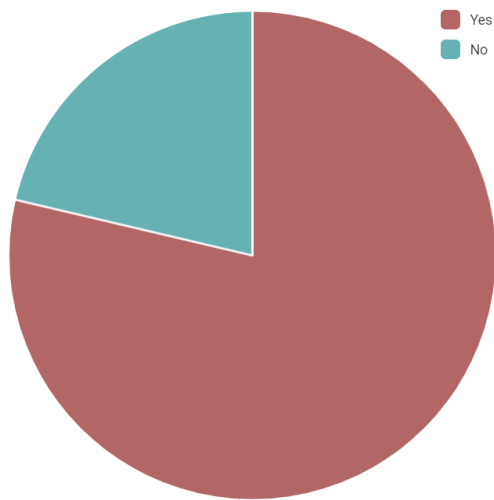
- To be considered should, whether in future "Integration and social inclusion" should be more general and less specific on one single group (Roma) only. – Also I'd like to see a focus on "citizenship education" in the sense of "democracy- and human rights education" with the aim of "empowering (young) people" for democratic participation and active citizenship.
- There are only around 500 Romas living in Estonia, but we fill in questionnaires about Roma issues more often than on any other issues. There are sever[al] bodies international working with Roma integration. Yes, it is a huge topic in some of the member countries, but in other member countries, there are other ethnic groups with their problems. Maybe the viewpoint of FRA could be more inclusive towards other ethnic groups as well, and the diversity of the issues.
- The thematic are[a] "integration and social inclusion of Roma" should be further developed based on the participation of Roma civil society. It should be renamed to "inclusion, equality and participation of Roma" and address specifically the fight against antigypsyism.
- la última, integración e inclusión de los gitanos podría incluir el concepto de igualdad (igualdad de trato e igualdad de oportunidades), en línea con el nuevo marco estratégico europeo para la población gitana 2021–2030.

Additional general comments not directly related to one (or only one) thematic area:

- Challenges continue to arise (in "the COVID-19 era" and it is reasonably to expect the same even after it) in all current MAF areas in EU Member States and thus require further attention from the FRA.
- The extreme urgency and necessity of each of the above mentioned themes.
- Those are all important aspects that also involve people with intellectual disabilities.
- All of the[m] remain very important and there is still a lot of improvement expected.
- Inform and Educate people on the European Fundamental Rights, hold meetings with individuals and institutions in cooperation with NGO ECYSE.
- There are so many areas which require attention to improve social inclusion and justice that we believe the mandate should be as wide as possible.
- We should speak about sexual orientation, gender identity and expression, and sex characteristics (SOGIESC) to include all LGBTIQ* and to leave no one behind.
- All of the abovementioned areas are important. However, it is impossible to include new areas if all the old ones remain. Therefore I had to make some painful choices.
- All are important issues that warrant particular attention.
- All the areas are relevant and will be in the future. It is important that the fundamental rights in all these areas get the attention needed.
- As they are related to the promotion and protection of human rights for all!
- These issues concern very small groups, but, for example, the interests of parents and individuals, as well as the concerns of families living in poverty, have not been taken into account. Also not mentioned Security-related risks to classical human rights. Recent events show that the topics suggested in the questionnaire are not the most important to societies and do not speak to people. There is also no reference to the fact that, in addition to rights, people also have responsibilities primarily to their families, the state and society.

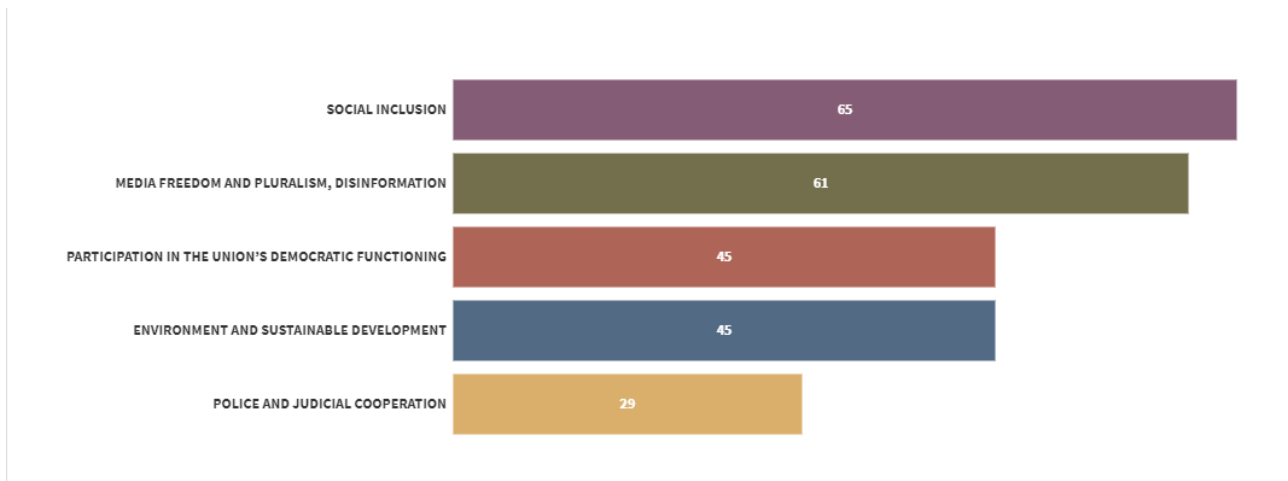
- Consideramos áreas fundamentais para promover a inclusão social, a igualdade de oportunidades e promoção de uma sociedade mais justa e equitativa.
- We sincerely believe that for true equal rights & opportunities without discrimination for diversity, all possible discriminatory actions against any citizen should be handled under one single common strategy, to avoid dispersion and non-attention in double or triple discrimination cases. Example – a black Muslim lesbian women in risk of poverty. She could be discriminated for racial, religious, gender & sexual orientation, as well as her dire financial status.
- All the above present significant challenges to European societies, and hence should be part of the MAF.
- All important areas. It is important to ensure, however, that they are inclusive of all groups, such as persons with disabilities, LGBTIQ, children, older people, women etc.
- All of these reflect highly relevant issues for European societies nowadays.
- None of these areas has become less relevant (although, conceptually, there are some overlaps among the existing areas).
- I think that all mentioned areas should remain MAF areas because all these topic are extremely important.
- All those areas report fundamental rights that shall be protected, according FRA mission.
- The work of the FRA in all of these areas remains crucial as fundamental rights concerns in all of these areas remain and EU competence in these areas is expanding.
- The current MAF areas are not within our core area of work or expertise and it is therefore difficult to say whether or not they should remain MAF areas. They are of course all very important areas to work with but I am not really up to date on the status of these areas right now.
- There are areas with a lot of problems at national and European level.
- All areas are relevant to the EU and the future of our societies. All the areas should remain.

In your view should new thematic areas be added in the new MAF?



Answer	Count	Percentage
Yes	118	79
No	32	21

The thematic areas provided below are examples based on earlier proposals by the Management Board, however, we kindly ask you to identify any other thematic areas that you consider of major importance for the FRA.



COMMENTS FOUND UNDER EACH SUGGESTED THEMATIC AREA

Social inclusion, including social security, employment etc.

- Given that the current pandemic has wreaked havoc on all areas of social rights and social protection, this should be a major focus area.
- Very important with and after COVID, esp. including domestic care issues.
- COVID-19-policies increases unemployment and social inequality enormous.
- Minimum common standards in wages, housing, pensions.
- Impacts vulnerable groups such as LGBTI people strongly.
- Particularly social protection for young people who age out of the alternative care/child protection system and need state support for independent living and inclusion; and for family strengthening policies and services to prevent child separation from parents whenever possible.
- As a result of the COVID-19 pandemic, we expect an increase of poverty and loss of employment, and social benefits. The people who were already in a vulnerable position prior to the pandemic (e.g. irregular work, migrant workers, people with disability) are hit hard, and a new development is young people that lose their jobs or perspective of employment.
- Fight against poverty.
- Even more challenging issue in the post-pandemic EU.
- Poverty.
- None should be unemployed.
- This linked to the lasting impacts of COVID would be extremely important.
- Given the disproportionate impact of the Covid-19 pandemic on persons in institutions, particularly persons with disabilities, it is essential to have a human rights focus on removing segregation and isolation through the development of genuine community inclusion and the necessary services and supports to achieve this.
- Social inclusion is extremely important in tackling other human rights problems, such as violent extremism, racism, xenophobia, etc.
- Inequalities in access to universal rights, e.g. education, on the basis of socio-economic backgrounds.
- A inclusão de pessoas com situações de doença crónica.
- Indispensable on the case we cite as example ... social & labour inclusion denied, is also discrimination.
- Addressing Gender-based violence and all its causes; Guarantee Sexual and Reproductive Rights; Gender and Social Justice; Fight against fundamentalism and hate-speech; Guarantee Human Rights Defenders rights; Putting care at the centre of our ethics and our politics.
- Aspects of discrimination in access, maintenance and exclusion from the workplace.
- Social integration and inclusion of marginalized communities, including ethnic or national minorities.
- This is a most pressing issue all across Europe and will become even more topical after COVID-19.
- Poverty and social exclusion due to lack of access to services and rights are also a big problem to people from low socio-economic background that are systematically excluded, and that are targeted for hatred by populist movements.
- Social cohesion needed to reduce ongoing fragmentation.
- As part of a broader FRA focus on economic, social and cultural rights.
- Right to physical and mental health is of particular relevance in this sanitary crisis; right to housing and other social and economic rights need further attention.
- Especially in Covid-era there are a lot of challenges for social inclusion.
- Yes, and this should include the right to health, universal access to healthcare for all.
- The Covid-19 measures brought even greater differences. Those who are excluded feel even more excluded, therefore a positive action would be needed to promote social inclusion and the promotion of other economic, social and cultural rights.
- We believe education should also be covered within this area.
- People from low socio-economic disadvantaged background, beyond looking only at children in poverty.

Media freedom and pluralism, disinformation

- It is becoming a more important area with fake news being spread more and more often.
- Sensitive, but utmost important topic.
- The COVID-19 policy restricts media freedom and freedom of opinion. The media and the governments themselves spread disinformation too and feed with their not transparent and authoritarian policy those who are accused to spread misinformation! It's just like a war of religions/ideologies. Both "faith communities" should be equal, both are false and true.
- Related to other fundamental rights issues, e.g. media representation of vulnerable groups such as LGBTI people.
- This continues to be a struggle around the world, I am not sure whether this should have priority over other topics.
- Limitations on sexist or other kinds of hate speech.
- Disinformation as an important problem for elections and health care (fake news on pandemic etc.).
- Seminars should educate people on Fundamental Rights and reporting media disinformation.
- Key actors re a pluralistic and democratic society, forming of public narratives.
- Dealing with disinformation and fake news that feeds anti-human rights and anti-child rights movements.
- Monitoring and combatting of fake news.
- Hate speech and freedom of expression will most likely remain important issues also in the future. Media freedom is under attack in many EU countries, and as it is a central prerequisite for democracy, it should be high on priorities list.
- Subject is important in view of the attacks on media freedom in a number of member states and the need to uphold democracy and the rule of law in all EU member states.
- Freedom of media is essential for modern democracy, protecting the independence of the media is a cornerstone of democracy, while the threats to impartiality and integrity will only increase.
- Does the media violate human rights? Click Media?
- Citizenry is often misdriven due to Fake News by vested interests manipulating media communications, where pluralism is curtailed.
- Fake news and democracy.
- Disinformation is really important!
- Especially in relation to the political participatory rights (elections, etc.).
- To ensure the respect of the indivisibility of the right to freedom of expression in all its forms and by all expressers, Freemuse recommends that a focus be placed on media freedom with explicit recognition of the role and importance of artistic freedom.
- Equal access to funds for minority media.
- ... more important than ever!
- Fake news, hate speech and other media phenomena are increasing in several EU countries, and there is a clear need to have more fact-checking as well as a clear support to journalists who are facing blackmailing and violent speech attacks both from extreme right and extreme left parties and/or followers.
- IT has utterly changed the media landscape, hence the need.
- In light of recent events, notably within electoral processes, the role of social media and emergence of radical movements.
- Media freedom and pluralism is under serious threat in several EU countries. A matter of concern is also how the business model of big tech companies facilitates the spread of harmful content such as hate speech and disinformation. The EU is stepping up engagement on these issues, for example through the new annual rule of law review cycle. Strengthened engagement on this by FRA will help ensure that the protection, respect and promotion of fundamental rights is at the centre of these efforts.
- Media freedom and pluralism are the core values of the EU and part of the rule of law framework. In some EU member states they might be threatened, however no state is immune. Disinformation is a separate, though connected issue, which should in times of social media be properly addressed.

Participation of the citizens of the Union in the Union's democratic functioning

- Unemployed and poor people have absolutely NO voice in the European Union. They have no rights and are threatened as nobodies.
- European Citizens' Initiatives, effectiveness of petitions and complaint procedures.
- With a view at the CSOs' [civil society organisations] "shrinking space".
- The Greek citizen don't know for the Charter.
- True Democratic functions should be installed so that all the people through media should vote, on constitutional right issue, and be informed first of all on European Fundamental Rights.
- Citizens' participation is key to democracy and faces new, additional challenges in the time of the pandemic.
- Including the meaningful participation of children below the age of 18 – children across Europe have repeatedly indicated that they would like to be involved in democratic and public decision-making.
- With growing pressure on the EU organs from anti-democratic, anti-human rights Member States, ensuring their independent functioning through enhanced participation, transparency and accountability is a necessary safeguard that should be supported by FRA.
- Role of CSOs to expand accessibility of democratic participation of EU citizens in EU democratic functioning; discrepancies in accessibility linked to inequalities; knowledge of EU citizens of the existence of democratic participation tools at the EU level.
- Little understanding of real EU functioning and low level of knowledge of the law among EU citizens results in passive attitude and lack of commitment to matters important for the EU.
- Guarantee women's participation from an intersectional perspective.
- On barriers to participation.
- ... because 'democracy' doesn't happen automatically and cannot be taken for granted!
- This area needs still a lot of promotion and awareness-raising as it is not widely known among the public.
- Establishment of a formal consultation process to include the input of citizens along the legislative and implementation process.
- Lack of participation of several target groups such as children, youth, migrants, Roma, NEETs [people not in education, employment or training] usually makes them or victims or perpetrators of hate crime, as well as foster their social exclusion. Measuring these phenomena and situations will help to reduce their full participation in society.
- Further work should be done on the right to participate in political and public affairs and associated rights such as freedom of expression, freedom of association or political rights.
- Citizens' inclusion and participation is always an issue in EU.
- After Brexit it is important to enhance projects for all EU citizens on the importance of their participation in the EU's democratic functioning.

Environment and sustainable development

- Considering the fact of climate change affecting also Europe and growing trend of the so called climate litigation, arguing the violations of various human rights, this should be included as a priority topic for the FRA.
- The climate change challenge is growing and not enough is being done to tackle it.
- Poor people have lesser possibilities for a proper and healthy live and can't flee unhealthy conditions.
- This will be the biggest challenge in the decades to come, and would deserve more attention from a human rights perspective.
- The right to the environment is a human right.
- Europe's youngest citizens, children, are attaching high priority to deal with the environment.
- Human rights and social inclusion should be included in the fight against climate change and other environmental problems.
- Inequality of the impact of the environmental crisis on different socio-economic brackets of the population, e.g. repercussions on jobs and opportunity to access up-/re-skilling, discrepancies in the

health repercussions on inhabitants of vulnerable/wealthy socio-economic geographical areas/neighbourhoods.

- Suppressing all value-added opportunities in order to preserve the environment.
- With Agenda 2030 in mind, indispensable to take sustainability into account.
- Absolutely important to keep climate change and environmental issues a priority.
- Climate Justice (beyond development).
- This is a new area in international human rights and FRA should lead in it.
- Citizens' entitlement to clean air, high quality water and food should be a fundamental right.
- Considering the EU Green Deal, the SDGs at European level and the big work done by many CSOs on this field, as well as the commitment (serious or not) of many governments on this field, makes this priority high recommendable.
- Very pertinent to connect these two items.
- Promote best practices among individuals and institutions, consumption control and management of energy.
- Magnifying effect of the climate change and environmental issues on the already existing geographical, socio-economic, gender, citizenship, and other inequalities.

Police cooperation and judicial cooperation in criminal matters (former 'third pillar')

- Cooperation in judicial matters is a key element to ensure the victims' rights are protected and perpetrators are punished.
- Police should use cameras when confronting civilians.
- Important subject in view of ever increasing anti-terrorism measures in member states and in view of challenges to the independence of the judiciary in some EU member states.
- Tensions between protection of rights of individual and effectiveness of cooperation in criminal matters will grow, and will have negative effect on protection of human rights.
- in terms of helping States in providing a fair legislation about police activities and attitudes, in terms of protection of civil rights of citizens from police abuses.
- Police & justice may well be, in more occasions than thought, source of discrimination.
- It would be important to explicitly mention the rights of persons deprived of liberty as a priority – the COVID19 crisis has given visibility to the critical situation across the EU.
- Aspects related to structural discrimination in the system.
- It could be merged with existing focus on judicial cooperation.
- The rights of victims of crime (regardless the immigration status). Following the entry into force of the Treaty of Lisbon, police cooperation and judicial cooperation in criminal matters have become part of Union law and are therefore covered by the scope of the tasks of FRA, as all areas falling within the competences of the Union. Including the area of police and judicial cooperation in the MAF would not only reflect the needs on the ground, but also allow the Agency to provide comprehensive analysis on its own initiative in areas that are of obvious relevance to fundamental rights. On policing, we would recommend that FRA explore the fundamental rights concerns around facial recognition and other biometric surveillance methods for crime prevention and predictive policing, as well as collaborations between private companies and public authorities on these matters. There is an increasing reliance upon these approaches within proposals within policing, migration control and counter-terrorism proposals emerging at EU level, and yet an absence of solid evidence and expertise with regards to fundamental rights. FRA would be well placed to raise awareness with regards to the risks of data protection violations, racial profiling, and discriminatory targeting of ethnic and religious minorities.

Other thematic areas suggested by stakeholders

- Since March, EU Member States have restricted fundamental rights in an unprecedented [way], in some cases declaring a state of emergency to ensure courts cannot rule against

disproportionate measures. As human rights is a priority on paper in the EU, this is a topic to be tackled and the re-occurrence of this must be prevented.

- Similar to social security and employment issues – huge area not yet solved, but causing very different problems horizontally and vertically.
- Burden of documents’ translations, language requirements in employment.
- Eradication of obstetric violence against women, their children and families.
- It is important to single out the most important challenges from within the ‘Equality and discrimination’ issue. We agree with Roma being specifically highlighted, but we think LGBTI people should be similarly highlighted, especially in relation to the adoption of the first LGBTIQ strategy by the European Commission.
- Gender-based violence; domestic violence; violence against children.
- To see if recovery measures benefit and reach these groups.
- Access to independent courts and functioning of the system of justice.
- More focus should be given to access to justice for children, child friendly justice, juvenile justice and deprivation of liberty of children (follow up of the Global study on children deprived of liberty).
- Right of the Child, such as the rights to participation, education, play and protection have to be applied also to the digital space.
- Many people with disabilities are living in institutions due to lack of support for independent living, reducing their fundamental freedoms.
- Considering the increasing number of elderly people in the EU, challenges in providing satisfactory, affordable and humane care to these elderly populations, the reliance on mobile care workers, who are often underpaid, undervalued and under-protected in terms of worker’s rights, the recognition of care workers as essential workers during the pandemic, the impact the COVID related enforced border closures had on the ability of care workers to perform their jobs and benefit from worker’s rights, etc. are overlapping issues of major concern in Europe that deserves to be addressed. For Caritas Europa, this issue will be part of our new Strategic Framework and we would welcome partnering with the FRA, ICMPD [International Centre for Migration Policy Development] and other actors already working on this topic from varying standpoints, with a focus on one particular topic.
- Monitoring and combatting of hate speech.
- There are several gendered problems in the labour market: gender pay gap, pregnancy discrimination, sexual harassment, etc. These are also human rights problems. They should be tackled both in EU and Member State levels.
- The FRA already deals with AI to some extent, but this issue needs a much more systematic and comprehensive approach. In addition, following the end of the COVID-19 pandemic, its impact on the protection of fundamental rights, both more generally at EU level (e.g. free movement of people, services, etc.) and by Member State (e.g. freedom of movement, entrepreneurial freedom, access to education, etc.), should be thoroughly examined in order to be better prepared for such situations in the future.
- Artificial intelligence in the context of how it could contribute to respect for human rights; Challenges faced by equality bodies for the protection of human rights in the times of COVID-19 – vulnerable groups, access to social aid, education, services; People with disabilities – accessible environment, access to information, ensuring a meaningful and dignified life.
- Crimes against the population, deportations, prison camps. What the communist regimes did.
- RML [regional and minority language] speakers in Europe continue to suffer varying degrees of discrimination ranging from general stigmatisation, hate speech, to physical violence by State police forces simply for speaking their European language. Furthermore, various EU States continue to actively discriminate against RMLs in their territories to the point that many are now defined as severely endangered by UNESCO. When is the FRA going to take any action on this?
- Acesso aos cuidados de saúde.
- Promoting education on human rights, democracy, non-discrimination and equality. Especially advancing professional knowledge in educational institutions (teachers, principals etc.).

- This is more of a transversal theme, encompassing the rights to freedom of expression, freedom of assembly, privacy, participation, equality, ...
- Especially in other areas than anti-corruption, rather in connection with the everyday life of the citizens in order to enable them to make their own decisions (for example: pandemic related information sharing practices).
- Explanation: in my view, serious problems exist within religious groups. These include child sexual abuse, discrimination of sexual and gender minorities and forced shunning which means social isolation of friends and family dictated by religious groups.
- Trainings, network development, legal support, etc.
- FRA is already doing a lot of work on this area* but it would be very important to give more prominence and visibility to this line of work by explicitly incorporating it to the MAF.
- Empowering people for participation and active citizenship from an early age on.
- Even though the rights of persons with disabilities should be mainstreamed across all areas, having them as a separate area would ensure they are not overlooked. This is particularly important given the EU is party to the CRPD and the Convention is not implemented adequately at the moment.
- Many marginalised and vulnerable groups including women and children cannot access healthcare due to poverty, discrimination, conflict situations.
- Treating this matter will help restore the current imbalance of democratic checks & Balances. should be shorter and more practical.
- More consistent consideration of intersectional challenges to fundamental rights.
- Rights, protection, care, social inclusion and social promotion of the elderly.
- Protection of people particularly affected by the pandemic, such as the homeless, children, the elderly, women, people with disabilities and prisoners.
- What is the relationship of intersection forms of discrimination? e.g. what is the situation of LGBTIQ* refugees? how does poverty affect safety of LGBTIQ*? what obstacles do LGBTIQ* with disabilities face?
- While FRA is already doing important work in this field, the increasing threat across the EU to civic space, particularly to human rights defenders, shows the need for continuing the agency's work in this area and increasing the profile of this work. A wide range of fundamental rights are at stake both of the groups and individuals active in civil society and of the people whose lives they are working to improve. There is a dire need for the EU to step up in this area and FRA can help make this happen and ensure that the protection, respect and promotion of fundamental rights is at the centre of these efforts.
- 1) The right to live independently (close all institutions). 2) No IQ-discrimination, i.e. the discrimination of persons with intellectual disability. 3) Equal rights for all, regardless of the severity or type of disability.
- Given the intensifying backlash against women's human rights including sexual and reproductive rights in the EU, including by some EU Member States, it is crucial FRA stands up for these human rights.

* Freedom from torture and protection of human rights defenders

What is the name of your organisation? To help us understand the results please insert the name of the organisation

The following organisations answered:

- Faculty of Law, University of Ljubljana
- Parents International
- JoopeA Foundation
- Hijap
- Payoke
- Human Rights Monitoring Institute
- Associação Plano i
- Association Pro Refugiu
- For Our Children Foundation
- In IUSTITIA
- Gender Equality and Equal Treatment Commissioners Office (Estonia)
- Aktive Arbeitslose Österreich (Active Unemployed Austria)
- Latvian Human Rights Committee
- Homo Digitalis
- CET (Centre for equal treatment)
- Refugee Rights Europe (RRE)
- Arcigay Palermo
- El Parto es Nuestro
- Ombudsman Office of North Macedonia
- Institute of Conflict Research IKF
- ZARA – Zivilcourage und Anti-Rassismus-Arbeit
- Coordination des Associations et des Particuliers pour la Liberté de Conscience
- Accem
- Office for international relations, and legal and judiciary cooperation of the Attorney General's Office (however I answer in a personal capacity not binding my institution)
- Háttér Society
- European Criminal Bar Association
- Vlaamse ombudsdienst (+ equality body gender/sex)
- SOS Children's Villages International
- Inclusion Europe
- LIBERA. Associazioni, nomi e numeri contro le mafie
- Ligue des droits de l'Homme (France)
- Nidos Foundation
- Àltera
- Netherlands Institute for Human Rights
- Social Platform
- Belgian Institute for the equality of women and men
- Office of the Commissioner for Human Rights
- LGBT+ Danmark
- Defensor del Pueblo Andaluz (Ombudsman of Andalucía)
- ETC Graz
- Grupo de Estudos Europeus de Lisboa
- Associazione Antigone Onlus
- European Center Young South Europe
- Public Defender of Rights of the Czech Republic
- Défense des enfants International Belgique
- NGO/NPO The Rosegarden of Philosophers

- Austrian Disability Ombudsman
- Unia
- Commission for the Rights of Persons with Disability (Malta)
- jugendschutz.net
- Spanish Committee of Representatives of Persons with Disabilities (CERMI)
- Central Council of German Sinti and Roma
- Médecins' du Monde
- The Danish Institute for Human Rights
- Carits Europa
- Eurochild
- Validity Foundation
- Portuguese Refugee Council
- Hungarian Helsinki Committee
- Office of the ombudsman for persons with disabilities Croatia
- Greek Council for Refugees (GCR)
- Lesbian and Gay Federation in Germany LSVD
- Ombudsman for Equality
- The National Commission for the Promotion of Equality
- SOLIDAR
- De Nationale ombudsman
- Chancellor of Justice
- German Institute for Human Rights
- THE SMILE OF THE CHILD
- Adam Mickiewicz University, Faculty of Law, Poland, Criminal Procedure Chamber; Supreme Court, Judge
- VIS – Volontariato Internazionale per lo Sviluppo
- Commission for Protection against Discrimination
- Office of the Attorney General
- Estonian Institute of Human Rights
- European Language Equality Network
- FONDAZIONE SCUOLA DI PACE DI MONTE SOLE/Peace School Foundation of Monte Sole
- ECIT foundation
- Abogacía Española, Delegación en Bruselas
- PACT Foundation
- Centro Anti Discriminação VIH e SIDA
- ObservatoriCat
- FIC – Forum for International Cooperation
- Observatory on Intolerance and Discrimination against Christians in Europe (OIDAC)
- Network of European LGBTIQ Families Associations – NELFA
- ZARA Zivilcourage und Anti-Rassismus-Arbeit
- University of Bucharest
- Laboratorio dei Diritti Fondamentali – Collegio Carlo Alberto, Torino (Italy)
- University of Helsinki
- Fundació Aroa
- The Daphne Caruana Galizia Foundation
- Liga voor Mensenrechten (League for Human Rights)
- Hungarian Civil Liberties Union (Társaság a Szabadságjogokért)
- Centrum Informatie en Documentatie Israel (CIDI)
- Centre for Children's Rights Studies – University of Geneva
- Uskontojen uhrien tuki UUT ry
- Alliance des Avocats pour les Droits de l'Homme
- Creación Positiva
- ActionAid International Italia Onlus

- Human Rights Defenders e.V.
- Freemuse
- Ambdrets
- OMCT – World Organisation Against Torture
- ACATHI
- Associação ILGA Portugal
- METAdrasi
- Federation of Western Thrace Turks in Europe (ABTTF)
- Europify – Independent Institute for European Integration & Education
- Commission for Citizenship and Gender Equality
- HOGAR SÍ
- SocialUp
- Ombudsman for Children’s Office
- European Network on Independent Living – ENIL
- Ararteko, Ombudsman for the Basque Country
- European Institute of Women’s Health
- Ludwig Boltzmann Institute of Fundamental and Human Rights
- Ludwig Boltzmann Institute of Fundamental and Human Rights – Department Human Dignity and Public Security
- Misiones Salesianas
- Romanian People’s Advocate
- Advocate of the Principle of Equality
- Conference of INGOs [international non-governmental organisations] at the Council of Europe
- Ludwig Boltzmann Institute of Fundamental and Human Rights
- Comissão para a Igualdade no Trabalho e no Emprego
- Federal Anti-Discrimination Agency Germany
- Commission consultative des Droits de l’Homme du Grand-Duché de Luxembourg
- The Federal Ombudsman of Belgium
- AGE Platform Europe
- Lithuanian Centre of Social Sciences
- B.a.B.e. Be active. Be emancipated.
- COI Foundation
- Commissioner for Administration and the Protection of Human Rights (Cyprus Ombudsman)
- Provedor de Justiça (Portuguese Ombudsman)
- Diversity Development Group (DDG)
- ‘Hope For Children’ CRC [Convention on the Rights of the Child] Policy Center
- Bundesverband Trans*
- Ludwig Boltzmann Institute of Fundamental and Human Rights
- De Wereldhuis Den Haag (The Hague World House)
- European Organisation of Military Associations and Trade Unions
- Amnesty International
- Riksföreningen JAG (JAG Association)
- Greek Ombudsman
- International Planned Parenthood Federation – European Network
- FUNDACIÓN SECRETARIADO GITANO
- The Human Rights Ombudsman of the Republic of Slovenia
- IGLYO — The International LGBTQI Youth & Student Organisation
- Associação Lusofonia, Cultura e Cidadania
- European Trade Union Committee for Education, ETUCE
- International Federation of Social Workers – European Region (IFSW-E)

FRA – European Union Agency for Fundamental Rights

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