



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR JUSTICE AND CONSUMERS

Directorate D – Equality and Non-Discrimination

Unit D.1 – Non-Discrimination: LGBTIQ, Age, Horizontal Matters

**SYNOPSIS REPORT - CONSULTATION ON THE 2020-2025 LGBTIQ EQUALITY
STRATEGY IMPLEMENTATION REPORT**

1. INTRODUCTION

On 12 November 2020, the European Commission adopted its first-ever LGBTIQ equality strategy for 2020-2025. This marked a new phase in the EU's efforts to address the inequalities and challenges affecting LGBTIQ people, with the aim of moving towards a 'Union of Equality'.

This document provides an overview compiled by the Commission services of all consultation activities conducted with stakeholders from mid-June to mid-September 2023 as part of the report on the implementation of the 2020-2025 LGBTIQ equality strategy. The general objectives of all consultation activities were to collect stakeholders' views on the current challenges and situation of LGBTIQ people in the EU and the state of implementation of the strategy, paying specific attention to certain issues, including intersectionality, mainstreaming, and supporting Member States.

The following types of consultation took place:

- call for evidence on the 'Have Your Say' portal¹ (21 August – 18 September 2023);
- targeted consultations with Member States, LGBTIQ civil society organisations and other stakeholders, through specific online questionnaires (16 June – 18 September 2023);
- meeting with LGBTIQ umbrella organisations (5 July 2023);
- meeting of the LGBTIQ Equality Subgroup² of the High-Level Group on Non-discrimination, Equality and Diversity (6 July 2023).

2. OVERVIEW OF CONSULTATION ACTIVITIES

This section presents the methodological and procedural aspects of the different consultation activities that fed into the report.

2.1 Call for evidence

The call for evidence ran between 21 August 2023 and 18 September 2023 on the 'Have Your Say' portal. It aimed to compile a broad range of opinions from stakeholders on the implementation of the LGBTIQ equality strategy halfway through its implementation period.

A total of 156 contributions were received. Of these, 96 contributions were published, while 60 were unpublished due to non-compliance with moderation rules³. All of those 60 contributions were unpublished due to abusive, slanderous or hateful content. Out of the 156 contributions received, 121 (around 76%) came from European citizens, 22 from NGOs, 5 from trade unions, 4

¹ The full text of the call for evidence is available on the [Have your say](#) portal.

² The LGBTIQ Equality Subgroup is mainly composed of Government experts, nominated by Member States' governments. It supports and monitors progress in the protection of LGBTIQ people's rights in the Member States.

³ The rules for feedback and suggestions are available on the [Have your say](#) portal.

from non-European citizens, 2 from public authorities, 1 from a company and 1 from an academic institution.

2.2 Targeted consultations

Targeted consultations were conducted from 16 June to 18 September 2023. Two specific online questionnaires were designed, targeting on the one hand Member States and on the other civil society organisations and other stakeholders.

The questionnaire for Member States included two groups of questions: the first group focused on the current challenges and situation of LGBTIQ people in the EU, and the state of implementation of the LGBTIQ equality strategy. Here, specific attention was paid to specific issues such as intersectionality, mainstreaming, and supporting Member States. The second group of questions focused on the development of national action plans and strategies on the human rights framework for LGBTIQ equality that complement the LGBTIQ equality strategy in areas of Member State competence.

A total of 20 Member States participated in the targeted consultation⁴. Of these, 18 replied through the online questionnaire and 2 provided their contribution via email.

A second online questionnaire was designed to compile the opinions of civil society organisations (CSOs) and other stakeholders (including LGBTIQ umbrella organisations⁵, Diversity Charters⁶, and other NGOs).

Overall, 23 replies from civil society organisations and stakeholders were received. Of these, 22 respondents provided input via the questionnaire, and one through email. The respondents included:

- 5 LGBTIQ umbrella organisations
- 3 Diversity Charters⁷
- the Fundamental Rights Agency (FRA)
- European Parliament's LGBTI Intergroup
- 12 national and international organisations with various focuses⁸ (LGBTIQ, age, AIDS, statelessness).

⁴ AT, BE, CZ, HR, DK, EE, FI, FR, DE, EL, IE, IT, LT, LU, MT, NL, PT, SK, ES and SE.

⁵ EuroCentralAsian Lesbian Community (EL**C*), Organisation Intersex International Europe (OII Europe), Europe Region of the International Lesbian, Gay, Bisexual, Trans and Intersex Association (ILGA Europe), The International Lesbian, Gay, Bisexual, Transgender and Queer Youth and Student Organisation (ILGYO) and Transgender Europe (TGEU).

⁶ Since 2004, 26 [Diversity Charters](#) have been established in Europe, providing support and promoting best practice in diversity management to thousands of leading multinational companies, SMEs and public organisations. They are established in the following countries: AT, BE, BG, CY, CZ, HR, DK, EE, FI, FR, DE, EL, HU, IR, IT, LV, LT, LU, NL, PL, PT, RO, SL, SK, ES, SE.

⁷ From CZ, HR and EL.

⁸ Association of LGBT and their friends Mozaika, Društvo Kulturno, informacijsko in svetovalno središče Legebitra, Europa Mundo Vacaciones S.L.U, European AIDS Treatment Group, European Citizen Action Service

2.3 Meeting with LGBTIQ umbrella organisations

On 12 April 2023, the Swedish Presidency of the Council of the European Union organised a high-level conference on LGBTIQ equality, in cooperation with the European Commission⁹. The conference, which took stock of progress in the implementation of the LGBTIQ equality strategy, included the participation of CSOs, national experts, representatives from EU institutions, and other relevant stakeholders.

In addition, a dedicated meeting took place on 5 July 2023 in Madrid with representatives of the five LGBTIQ umbrella organisations¹⁰ that concluded 4-year framework agreements with the Commission for 2021-2024. This meeting, adjacent to the High-Level Conference Advancing LGBTIQ Rights in Europe¹¹, organised by the Spanish Presidency of the Council, gave the umbrella organisations the opportunity to share questions, preliminary comments or reactions on the report on the implementation of the 2020-2025 LGBTIQ equality strategy, before they submitted detailed input for targeted consultations through the online questionnaire.

2.4 Meeting of the LGBTIQ Equality Subgroup

On 6 July 2023, the ninth meeting of the LGBTIQ Equality Subgroup of the High-Level Group on Non-discrimination, Equality and Diversity took place in Madrid, with the participation of 19 Member States¹², Norway and the Commission. The conference was organised by the Spanish Presidency of the Council, adjacent to the High-Level Conference Advancing LGBTIQ Rights in Europe. The meeting's agenda included a discussion on the report on the implementation of the 2020-2025 LGBTIQ equality strategy ahead of the submission of detailed input through the online questionnaire, in particular to clarify questions from Member States about the targeted consultation.

3. RESULTS OF CONSULTATIONS

The following analysis of the consultation results focuses on feedback received as regards the implementation of the LGBTIQ equality strategy. In a nutshell, the LGBTIQ equality strategy is broadly seen by respondents as a necessary and meaningful policy tool that sends a clear political

(ECAS), European Network on Statelessness, Háttér Society, LGBT Ireland, Pacto Mundial de la ONU España, Prague Pride, Rainbow Families Croatia, Solidarité Internationale LGBTIQI.

⁹ Details of the event are available on the [website](#) of the Swedish Council presidency.

¹⁰ EuroCentralAsian Lesbian Community (EL*C), Organisation Intersex International Europe (OII Europe), Europe Region of the International Lesbian, Gay, Bisexual, Trans and Intersex Association (ILGA Europe), The International Lesbian, Gay, Bisexual, Transgender and Queer Youth and Student Organisation (ILGYO) and Transgender Europe (TGEU).

¹¹ Details of the event are available on the [website](#) of the Spanish Council presidency.

¹² BE, AT, CZ, EE, FI, FR, DE, EL, HR, HU, IT, LT, LU, MT, NL, PL, PT, ES, SE.

message in favour of equality. Overall, it is acknowledged as: (i) having had a positive impact on the situation of LGBTIQ people; and (ii) applying an intersectional policy approach and mainstreaming LGBTIQ equality across policy areas. The respondents also commented that the strategy has succeeded in encouraging a growing number of Member States to adopt and implement their own national action plans or strategies.

The analysis also reflects input received as regards which areas require more focus to fully implement the strategy by 2025. As explained below in detail, the respondents focused on different aspects and with differing degrees of detail, with the most comprehensive input stemming from civil society organisations under point 3.3.

In addition to providing input on the strategy's implementation, many respondents provided valuable comments on the changes in the situation of LGBTIQ people and the challenges they face, in particular at national level. Consequently, even though the analysis in this section focuses on the implementation of the current strategy, it also touches briefly on the broader situation and challenges identified by respondents in the consultation.

Section 3.2 on the targeted consultations from Member States also contains input on the development of national action plans and strategies. This is because such developments are also relevant for the implementation of the LGBTIQ equality strategy.

To comprehensively reflect the consultation results, some input as regards future policy work is also reflected in the analysis below, although this goes beyond the scope of the consultation.

3.1 Call for evidence

The call for evidence gathered a broad range of views from a variety of stakeholders. The most represented were European citizens and NGOs. A significant share of the contributions received on the call for evidence went beyond the topic of implementing the LGBTIQ equality strategy by identifying areas where the Commission could enhance its action. This section will highlight the main input from the call for evidence on the strategy's implementation and will refer back to the feedback available online¹³ for a more comprehensive overview of possible future actions.

Implementation of the LGBTIQ equality strategy

Overall, citizens and NGOs welcomed the adoption of the first-ever LGBTIQ equality strategy and the strong political stance taken by the Commission for LGBTIQ equality. However, many contributions shared the perception that there had been an increase in violence towards LGBTIQ people across Europe. The rise of anti-gender movements was heavily perceived as a worrying trend putting in jeopardy the rights of LGBTIQ people.

¹³ Feedback available on the Commission's [Have your say](#) website.

Key actions from the strategy were praised. These included the legislative proposal on parenthood and the revision of the guidelines on free movement to ensure increased recognition of rainbow families.

Data collection was mentioned as a key action needed to fully implement the strategy. It was stressed that there is very little data on the discrimination suffered by under-represented groups such as transgender, non-binary and intersex people. It was suggested that data collected on LGBTIQ people should be systemically disaggregated by age and geographical area to paint a more detailed picture of LGBTIQ people's experiences.

The issue of **visibility** was also raised in several contributions. For instance, a local authority in Spain highlighted the **lack of awareness of the LGBTIQ equality strategy at local level**. The Commission was advised to communicate more around the strategy and policies for LGBTIQ equality. Generally, a lack of clear understanding of the content of the strategy can be inferred from the proportion of topics mentioned in the call for evidence going beyond the strategy's scope.

Areas identified as requiring further involvement from the European Commission

The Commission was encouraged to enhance its action in a variety of areas. Education and health were mentioned the most.

Stakeholders asked for stronger focus on and protection of vulnerable groups such as transgender, non-binary, intersex, young and older LGBTIQ people. Other topics mentioned included employment, legal protection against discrimination and LGBTIQ-sensitive justice systems, asylum and LGBTIQ equality mainstreaming.

On the question of which are the most valuable tools, respondents most frequently mentioned:

- training (e.g. training of healthcare professionals, diversity training in the area of employment, training for the judiciary);
- awareness raising (e.g. in education as regards information on LGBTIQ people from an early age, awareness raising as regards diversity to foster values of respect and inclusion at school); and
- exchanges of best practice (e.g. as regards ensuring older LGBTIQ people's access to pensions, healthcare and a variety of services without discrimination).

With regard to political commitment, the Commission was encouraged to: (i) keep on upholding LGBTIQ people's rights and European values in the enlargement process and in the context of access to EU funds; and (ii) ensure, as guardian of the Treaties, that the principle of non-discrimination is fully respected by all Member States.

All [contributions](#) from the call for evidence can be found online.

3.2 Results of the consultations with Member States (targeted consultation and meeting of the LGBTIQ Equality Subgroup)

Implementation of the LGBTIQ equality strategy

Most Member States indicated that the LGBTIQ equality strategy has had a very **positive impact on the situation of LGBTIQ people** in the EU. The adoption of this first-ever strategy provided a clear political message in favour of equality. The designation of the first-ever Commissioner for Equality and the financial support for LGBTIQ civil society organisations have also increased the visibility of the Commission's commitment to equality.

Most Member States also have a **positive view of the strategy's impact on cooperation** between the Commission and their respective country. The creation of the **LGBTIQ Equality Subgroup** is highly appreciated as a platform for the exchange of good practices and networking. It provides added value for efforts at national level across the variety of topics covered. The **Guidelines for Strategies and Action Plans to Enhance LGBTIQ Equality**¹⁴, prepared by the subgroup, was particularly helpful to some Member States.

Most Member States with a dedicated action plan or strategy in place think that EU-level action since the strategy's adoption provides **added value for efforts at national level** in the following three areas: (i) legal protection against discrimination on the grounds of sexual orientation, gender identity/expression and sex characteristics in various areas; (ii) collection of comparable and reliable equality data; and (iii) legal protection for LGBTIQ people against hate crime, hate speech and violence.

Half of those Member States also shared a positive view of the added value at national level in two additional areas, while the other half does not have a clear position. Those areas were: ensuring safe and inclusive education for all children, young people and adults; and protection and support for victims of gender-based violence, domestic violence and anti-LGBTIQ hate crimes.

In other areas, most Member States were not able to provide a clear opinion. Such areas included: (i) trans and intersex people's participation in the labour market; (ii) addressing the mental health challenges faced by a significant number of LGBTIQ people; (iii) addressing the needs of LGBTIQ applicants for international protection; (iv) protecting and promoting LGBTIQ people's bodily and mental health; and (v) legal gender recognition legislation and procedures based on the principle of self-determination and without age restriction. However, all Member States with a clear opinion had a positive view on the added value for the efforts in those areas, with only one of them disagreeing in relation to the last area.

Overall, Member States shared a positive opinion on the actions carried out to implement the strategy in relation to **intersectionality and to the mainstreaming** of LGBTIQ equality into all EU policies, legislation and funding programmes. Member States support continuing paying attention to intersectionality, including by preparing specific materials to help Member States. Some respondents point out the need for clearer and more specific measures to apply

¹⁴ The full text of the guidelines are available on [Europa](#).

intersectionality. Similarly, it is suggested that more attention should be paid to mainstreaming LGBTIQ equality in funding programmes and in the EU pre-accession negotiations.

Most Member States did not identify **areas that require additional attention** in the strategy's implementation. The Member States that did, indicated the following areas:

- data collection (many Member States welcomed the Guidance note on the collection and use of data for LGBTIQ equality)¹⁵;
- peer-to-peer learning for Member States and the development of national action plans;
- inclusive education;
- creating safe spaces;
- passing on the current equality portfolio to a specific Commissioner in the next College of Commissioners;
- increasing conditionality between EU funds and the situation of LGBTIQ people;
- ensuring Member States' enforcement of EU laws and regulations;
- increasing human resources dedicated to LGBTIQ equality within the Commission; and
- facilitating NGOs' participation in the meetings of the LGBTIQ Equality Subgroup.

LGBTIQ people's situation at national level

Member States also identified the most **challenging areas** for LGBTIQ equality at national level. These were: discrimination, violence, hate crimes, hate speech and harassment, in particular targeting trans people. It was also acknowledged that the rise of anti-gender and anti-LGBTIQ narratives may have aggravated the situation.

Some specific challenging areas were identified by some Member States based on their particular context. These included legal gender recognition procedures and discrimination faced by rainbow families.

National action plans or strategies

A total of 12 Member States – Belgium, Denmark, France, Germany, Greece, Ireland, Italy, Luxembourg, Malta, the Netherlands, Portugal and Sweden – indicated that they **have a dedicated LGBTIQ national action plan or strategy in place**.

Most respondents indicated that their national LGBTIQ strategy or action plan/human rights framework **addresses the needs of LGBTIQ people in the following areas**:

- legal protection of LGBTIQ people against discrimination;
- inclusion and diversity in the workplace;
- safe and inclusive education for children and young people;
- access to healthcare and mental health counselling and the specific health needs of LGBTIQ people;

¹⁵ The text of the guidance note is available on [Europa](#).

- a safe and supportive environment for LGBTIQ victims of crime;
- training and capacity building for law enforcement to better identify and record LGBTIQ-phobic bias and increase crime reporting;
- protecting and promoting LGBTIQ people's bodily and mental health.

The following areas are less covered:

- inclusion of trans, non-binary and intersex people in relevant documentation, applications, surveys and processes;
- the specific needs of LGBTIQ applicants for international protection and the training of protection officers and interpreters dealing with asylum claims by LGBTIQ people;
- combating inequalities, gender stereotypes and biases in the media, the culture sector and sport;
- protection against hate speech and hate crime against LGBTIQ people (both online and in person).

Over half of the respondents indicated that the national LGBTIQ strategy or action plan/human rights framework makes provision for **legislative changes**, or that such changes have been recently adopted, in the following areas:

- legal protection against discrimination on the grounds of sexual orientation, gender identity/expression and sex characteristics in various areas, including equal access to healthcare, social protection, housing and the labour market;
- transparent and accessible legal gender recognition legislation and procedures based on self-determination;
- hate crime, hate speech and violence against LGBTIQ people.

Only a third refer to similar legislative changes in legal support mechanisms and remedy structures for victims of discrimination and crime.

In addition, **over two thirds** of respondents with a national action plan or strategy indicated that they have a **permanent government LGBTIQ coordination structure** bringing together all relevant policy areas and levels of governance, that they provide **structural funding for LGBTIQ civil society**, and that they have a **specific allocation of budget, timeline and responsibilities** to implement their LGBTIQ policy.

Two thirds of Member States with a national action plan or strategy developed **indicators/targets** to assess the implementation of LGBTIQ policies.

Finally, **11** Member States with a national action plan or strategy in place indicate that **monitoring and evaluation mechanisms** are in place at national level, while **over a half** of the respondents included the **involvement of policymakers and civil society**.

3.3 Results of the meeting with LGBTIQ umbrella organisations and the targeted consultation of civil society organisations and other stakeholders

The results of the meeting with umbrella organisations on 5 July 2023 were in line with the contributions these organisations provided through the targeted consultation questionnaire, which are summarised together below. The conclusions from the input from other stakeholders are listed at the end of this section.

Implementation of the LGBTIQ equality strategy

The respondents concluded that the **strategy has had a significant impact on the situation of LGBTIQ people in the EU**. It has served as an important point of reference and commitment that has led to more action at both EU level, including ambitious legislative proposals and funding for CSOs¹⁶, and within the Member States, some of which have recently adopted national actional plans or strategies.

Respondents noted that there has been an **improvement in the rights of trans and intersex people**. In particular, many Member States introduced legal reforms to recognise and protect their rights, including measures related to legal gender recognition (LGR) and bans on intersex genital mutilation (IGM). Moreover, **several Member States had expanded anti-discrimination laws** to explicitly include sexual orientation, gender identity and/or gender expression as protected grounds. This provides enhanced legal protection for LGBTIQ people in areas such as employment, education and public services. Additionally, some Member States have **strengthened the recognition and protection for same-sex couples** through the expansion or establishment of civil partnerships, granting more rights in areas like inheritance, social benefits and parental recognition.

However, most respondents observe that **progress has been uneven across Member States**, and the impact may vary depending on national contexts, political will and societal attitudes. All the umbrella organisations believe that the Commission could play a more important role in monitoring to what extent Member States are implementing certain measures.

Assessing the **strategy's ongoing implementation**, CSOs stressed the need to include gender identity and sex characteristics in new legislative proposals. As those grounds are not in the treaties, this may require creative approaches such as inserting references to case-law, clarifying in the preambles how gender identity and sex characteristics could be covered under sex, etc.

All the respondents highlighted that the strategy had a **big impact on increasing awareness and political determination** in Member States.

Challenges and situation of LGBTIQ people in the EU

The respondents highlighted the impact of the pandemic, Russia's war of aggression against Ukraine, the rise of anti-gender movements, and hate speech and hate crime.

¹⁶ Respondents very much appreciated the structural support to NGOs through the Citizens, Equality, Rights and Values (CERV) programme, including re-granting, and other funding opportunities through the same programme, and funding LGBTIQ equality projects under the Erasmus+ and European Solidarity Corps programmes.

According to the submissions, these challenges have disproportionately affected trans and intersex people, youth and LGBTIQ women. It was also observed that anti-gender narratives had a huge impact on young people, preventing young LGBTIQ people from benefiting from new laws, for instance by excluding minors from legal gender recognition laws.

On the positive side, respondents shared the view that international pressure from the EU and national governments, relevant case-law and infringement procedures launched by the Commission were preventing other Member States from adopting similar bills challenging the rights of LGBTIQ people.

Some respondents observed that, depending on the political context, strategic litigation could be the primary tool for changing or repealing discriminative legislation adopted against sexual and gender minorities. It was therefore proposed that funding mechanisms be developed that are suitable to fund strategic litigation, including longer-term grants and quick, flexible funding for urgent litigation needs.

Suggestions to further enhance implementation of the strategy

Suggestions to enhance implementation included:

- better and continuous engagement of CSOs (including at national level);
- enhanced mainstreaming of LGBTIQ equality in funding programmes and in the EU pre-accession negotiations;
- unified action and communication from the Commission when action is needed;
- follow up on implementation of ICD-11;
- implementation of measures to address free movement and cross-border issues (especially linked to rainbow families), through continued dialogue with Member States;
- promoting the collection of comprehensive and disaggregated data on the experiences and needs of LGBTIQ individuals and research on intersectional and multiple discrimination¹⁷;
- improved legal protection for LGBTIQ people against hate crime, hate speech and violence;
- addressing mental health challenges;
- addressing needs of LGBTIQ applicants for international protection, including ensuring appropriate protection of vulnerable applicants in the context of the Common European Asylum System and its reform (including LGBTIQ minors): and
- addressing the commitments linked to healthcare (especially for trans and intersex people).

¹⁷ In particular, it was proposed that data on sexual orientation and gender identity should form a core part of EU mandated national data collection including census, labour force and health surveys and that a regular, EU-wide victimisation survey, including questions on sexual orientation, gender identity and expression, and sex characteristics (SOGIESC) and hate crime victimisation, should be mandated.

On **intersectionality and mainstreaming**, CSOs cite difficulties as regards mainstreaming LGBTIQ equality across all Commission policies. In addition, they call for:

- effective integration when implementing different equality strategies, and strengthened cross-departmental collaboration on intersectionality;
- more information on the activities of equality coordinators in all DGs;
- inclusion of external expertise; and
- more effective mainstreaming of an intersectional approach in policymaking, debates and funding programmes.

On **supporting Member States**, it was highlighted that the strategy had a big impact on increasing awareness and political determination in those Member States that contributed to a more proactive and collaborative approach in addressing LGBTIQ issues. The respondents welcomed the establishment of the LGBTIQ Equality Subgroup under the High-Level Group on non-discrimination, equality and diversity. They view the Guidelines for Strategies and Action Plans to Enhance LGBTIQ Equality, prepared by the subgroup, as a particularly helpful output for Member States. They also welcomed the consultative processes that have involved European LGBTIQ civil society organisations across the full range of subject areas and that have in the past allowed CSOs to participate in the subgroup's meetings.

Regular access to **the subgroup's meetings** would be greatly appreciated by CSOs. The LGBTI Intergroup of the European Parliament also stressed that CSOs should be involved in the subgroup.

The exchanges of good practices in the LGBTIQ Equality Subgroup should be organised more regularly. CSOs identified possible themes for future editions, such as intersectionality, trans equality, LGBTIQ women and intersex genital mutilation. Also, intersectionality should be included in all national anti-discrimination plans focused on other grounds of discrimination.

It was suggested to investigate more closely how Member States are upholding their obligations under EU law in areas of equal access to employment, goods and services, victims' rights, etc. and to ensure that the needs of all subgroups within the LGBTIQ community are addressed in Member State action plans and strategies.

The respondents also stressed that it is very important to involve LGBTIQ organisations and civil society groups in developing and implementing action plans, as they can provide valuable insights and ensure that the plans reflect the needs and perspectives of the community.

The Fundamental Rights Agency (FRA) contributed to the consultation with a summary of the results of their 2019 Fundamental Rights survey concerning LGBTI people¹⁸. Moreover, referring to the dedicated chapter on LGBTIQ rights and discrimination in the *Fundamental Rights Report 2023*, FRA encourages Member States to continue adopting and implementing specific measures (including national action plans on LGBTIQ equality) to ensure that LGBTIQ

¹⁸ The results of the third wave of the survey were published on 14 May 2024 on the [FRA website](#).

people can fully enjoy their fundamental rights. When doing so, Member States should give due consideration to the Guidelines for Strategies and Action Plans to Enhance LGBTIQ Equality. Member States are encouraged to regularly collect and use SOGIESC (sexual orientation, gender identity and expression, and sex characteristics) equality data to develop evidence-based policy and legal responses. Member States should take all appropriate measures to effectively combat hate speech and address the harmful impact of homophobic and transphobic statements in public debates, political campaigns and the media, and on the internet.

The replies from other national and international organisations supported most of the conclusions presented above. In addition, they highlighted:

- the need to improve the strategy's implementation at national level;
- the importance of working directly with employers and of promoting inclusion and diversity in the workplace (especially in the public sector);
- the need for more engagement with stakeholders at national level (including national-level NGOs and civil society groups in consultations, while facilitating their collaboration with national public authorities and involving them more closely in the subgroup's work).

It was highlighted that the strategy would gain in inclusivity if it strengthened its outreach to LGBTIQ-related, though not LGBTIQ-specific, organisations focused on HIV, migration, sex work and homelessness.

National organisations also proposed evaluating the awareness and visibility of the LGBTIQ equality strategy among stakeholders, policymakers and the general public, as several respondents highlighted that there is very little knowledge and awareness about the strategy. Assessing the strategy's reach and impact can help identify opportunities to enhance its visibility and ensure that its objectives are widely understood. The extent of stakeholder engagement in implementing the strategy should be evaluated, as engaging with a diverse range of stakeholders including LGBTIQ organisations, civil society groups and relevant government agencies contributes to a more comprehensive and inclusive approach.

For the future, the respondents stress the need for a 2025-2030 LGBTIQ equality strategy. At the same time, they recommend focusing on: (i) designing a comparable framework to measure success comprehensively against the strategy (for example, using SMART goals or some sort of evaluating measure); and (ii) addressing the need for sufficient resources, timelines, tangible results and responsibilities, measurable goals and contact points.

4. OVERALL RESULTS FROM CONSULTATIONS

For many respondents, the adoption of the LGBTIQ equality strategy has been a milestone in the promotion of LGBTIQ equality. It provides a clear political message and commitment in favour of equality and has positively impacted the situation of LGBTIQ people. Most Member States with national action plans or strategies in place think that EU-level action since the strategy's adoption provides added value for efforts at national level in many relevant areas.

Civil society organisations also point out that the strategy is encouraging Member States to adopt new legislation (on legal gender recognition, to ban intersex genital mutilation and to protect same-sex couples), with some Member States adopting national action plans and strategies.

The results of the consultations demonstrate a positive view of the Commission's actions to implement the strategy. Some differences in the focus of the multiple stakeholders may be explained by their diverse backgrounds.

CSOs highlighted the importance of new legislative proposals, of funding opportunities for CSOs and of providing Member States with helpful instruments such as the Guidelines for Strategies and Action Plans to Enhance LGBTIQ Equality, which many Member States have themselves welcomed. An increasing number of Member States (12 in total) have adopted an LGBTIQ national action plan or strategy, and most of them include monitoring and evaluation mechanisms. However, despite this quantitative and qualitative advancement and the adoption of the Guidelines, over half of Member States have still not adopted a dedicated LGBTIQ national action plan or strategy.

Most Member States regard the LGBTIQ Equality Subgroup as a very good platform for the exchange of good practices. Many CSOs and some Member States suggest that the participation of NGOs in the meetings should be facilitated.

While the strategy was praised, stakeholders stressed that LGBTIQ people in the EU still face many challenges. These include: discrimination, harassment, violence, hate crimes and hate speech; anti-gender and anti-LGBTIQ narratives; and discrimination and violence experienced by trans people.

Faced with this context, all stakeholders consulted identified key areas that need to be addressed to fully implement the LGBTIQ equality strategy.

Civil society organisations highlighted the need for continued close cooperation between the Commission, Member States, international and national LGBTIQ organisations and stakeholders from other areas.

Many respondents to the consultations indicated that data collection requires additional attention in the context of the strategy's implementation.

Respondents identified the following areas for more focus in the strategy's implementation: health (including mental health); asylum procedures; legal protection for LGBTIQ people against hate crime, hate speech and violence; free movement and cross-border issues; mainstreaming of LGBTIQ equality in funding programmes and across the different Commission services. These areas were highlighted by many CSOs and citizens alike.