



EL*C PERSPECTIVES ON THE UNION OF EQUALITY

An EU LGBTIQ Strategy that serves Lesbians

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Introduction

The EL*C – the EuroCentralAsian Lesbian* Community is a feminist intersectional Pan-European network of over 200 LBTIQ-led and focused civil society organizations from 53 countries of Europe and Central Asia including from all 27 EU member states, as well as over 6000 individual women and non-binary persons. EL*C is the only such European Network that focuses exclusively on the rights, needs and interests of lesbian, bisexual, transgender, queer women and non-binary people socialised and perceived as women (henceforth "LBTIQ women") in Europe and Central Asia.

EL*C aims to make LBTIQ women and non-binary persons visible, strengthen their participation in decision making spheres, increase their access to human rights, social and economic justice and wellbeing, while contributing to relevant policies on the national, regional, European and international levels. As such, EL*C strives to be a representative, powerful and visible voice of movements of LBTIQ women and non-binary persons in Europe.

While the 2020–2025 EU LGBTI Equality Strategy provided an important framework to promote LGBTIQ equality, our analysis, the data collected in the past 5 years and the consultations with our members indicate that its implementation has not sufficiently addressed the specific needs of LBTI women across the EU.

EL*C evaluation of the current Strategy indicates that significant gaps in addressing violence, socio-economic inequalities, and health disparities experienced by LBTIQ women still exist, heightened by a persistent lack of funding for LBTIQ women's civil society organizations.



This submission builds on EL*C's extensive research and consultation work, includes data presented in the mid-term and final reviews of the current LGBTIQ Equality Strategy, as well as input into related frameworks such as the Gender Equality Strategy, to put forward targeted and evidence-based recommendations.

EL*C support continued EU actions in the key areas identified during the current consultations. The Strategy should address key priorities such as advancing health, education, and workplace inclusion, while tackling socio-economic inequalities, homelessness, and digital discrimination. It should also lead efforts to combat conversion practices, hate speech, and violence; ensure the rights of LGBTIQ asylum seekers, children, and families; and promote inclusive, feminist external action—particularly in accession and neighbouring countries. We also strongly support the EU's role in fostering a conducive environment for LGBTIQ civil society organisations—especially those led by and for LBTIQ women —and safeguarding their role as essential democratic actors.

However, we also wish to express our concern and disappointment that the European Commission has not explicitly acknowledged LBTIQ women as a specific category within the consultation for the upcoming strategy. It is important to note that gender stereotypes are a key driver of discrimination violence and harassment (both online and offline) against LBTIQ women, contributing to their social and economic exclusion and affecting their quality of life and public participation. At the intersection of sexism and SOGIESC-related stigma, LBTIQ women face invisibility, hyper-sexualisation, and erasure. The EU must address these stereotypes across all areas—education, media, healthcare, family, and work. However, it is crucial that this focus does not replace targeted action to support LBTIQ women specifically.

Given the critical intersection of gender, gender identity, gender expression and sexual orientation, LBTIQ women face distinct and compounded experiences and challenges that significantly differ from those of other LGBTIQ groups. Explicitly recognizing and addressing these unique experiences is essential for the effectiveness of the future LGBTIQ Equality Strategy.

1. Conversion Practices

LBTIQ women—particularly youth and those in conservative or religious settings—are highly vulnerable to efforts intended to suppress or change their sexual orientation or gender identity. According to FRA's 2023 LGBTIQ Survey, nearly one in three lesbians and half of trans persons (both men and women) reported having experienced some form of conversion



practice¹. LBTIQ women frequently report enduring emotional manipulation and forced concealment by families, religious authorities, or psychological professionals. Personal accounts included in the FRA Survey report highlighted severe psychological violence, particularly in family settings, as one respondent from Estonia described ongoing psychological violence by family members despite financial independence and adult age. Another specific example included a bisexual intersex woman from Italy who was subjected to cultural and psychological constraints aimed at altering her gender expression and sexual orientation². The survey report also notes that most respondents (76%) who underwent such conversion interventions did not consent to them, and 13% consented due to pressure or threats³.

In addition, data from EL*C's Annual Observatory on Lesbophobia highlights how non-coercive but persistent social pressures — such as being forced into heterosexual relationships, psychological dismissal by therapists, or pressure from religious leaders — can lead to trauma, anxiety, and long-term mental health consequences. Cases collected in the 2024 EL*C Observatory report⁴ include physical and sexual violence, domestic abuse by parents and other relatives, as well as more substantial practices (including by relocating the persons outside of cities to rural areas or to other countries).

These findings indicate the urgent need for targeted policies and actions to protect LBTIQ women, among other groups, from such harmful practices. However, a policy framework aimed at combating conversion practices in Europe cannot ignore the specific gender dimensions surrounding the more limited freedom and autonomy granted to women and girls and persons socialized as women and girls. It is also important to highlight that gendered assumptions about sexual orientation — such as the misconception that relationships with someone of a different gender can "correct" one's orientation —

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¹ FRA EU LGBTIQ Survey III, data explorer available here: https://fra.europa.eu/en/publications-and-resources/data-and-maps/2024/eu-lgbtiq-survey-iii

² FRA (2024) LGBTIQ equality at a crossroads – Progress and challenges, https://fra.europa.eu/sites/default/files/fra_uploads/fra-2024-lgbtiq-equality_en.pdf

³ FRA (2024) LGBTIQ equality at a crossroads – Progress and challenges, https://fra.europa.eu/sites/default/files/fra_uploads/fra-2024-lgbtiq-equality_en.pdf

⁴ EL*C (2025): Annual report of the Observatory on lesbophobic violence and discrimination against lesbians

^{– 2024 &}lt;a href="https://lesbiangenius.org/wp-content/uploads/2024-Observatory_final-report.pdf">https://lesbiangenius.org/wp-content/uploads/2024-Observatory_final-report.pdf. These cases are consistent with cases registered in the last 3 years. The 2022 and 2023 reports of the Observatory are available here: https://lesbiangenius.org/its-2024-and-lesbophobia-is-still-raging/



contribute to the vulnerability of lesbian youth, who appear to be disproportionately affected by sexual violence and so-called "corrective" rapes⁵.

However, due to limitations in EU competences and the scope of the treaties, introducing EU-level legislation to ban conversion practices may be both difficult to implement and potentially counterproductive. In some national contexts, such legislation could be misused to undermine the self-determination of trans people, rather than effectively combatting harmful practices across LGBTIQ communities.

For this reason, the European Commission should prioritize the exchange of good practices among Member States, invest in prevention and support services for survivors, fund trainings for mental health professionals, conduct EU wide communication campaigns, and provide dedicated financial resources to LGBTIQ civil society organizations working in this area. Crucially, more data—particularly qualitative—is needed to understand the incidence and impact of conversion or "corrective" practices across the LGBTIQ spectrum, with attention to how intersecting identities such as gender, racial and ethnic origin, religion, and disability shape these experiences.

Policy frameworks and actions should consider not only overt coercive practices but also insidious, non-overtly violent strategies targeting youth and addressing the connection between corrective practice and gender stereotypes and gender roles.

2. Data Collection on SOGIESC

High-quality, disaggregated, and comparable data on SOGIESC is essential for shaping effective, evidence-based policies. However, despite some progress, large-scale EU data collection continues to overlook the lived realities of many LBTIQ people—particularly lesbian, bisexual, trans and intersex women, older LBTIQ individuals, and those facing multiple and intersecting forms of discrimination. For example, in the 2019 FRA survey, only 768 respondents were identified as older lesbians (55+), representing less than 0.7% of the dataset⁶. Such underrepresentation hinders intersectional policymaking and weakens the

⁵ C. Hamel (2021) Violences intrafamiliales: les filles et les jeunes LGBT plus touchés, available at this link: https://www.defenseurdesdroits.fr/sites/default/files/atoms/files/etude-resultats_violencesintrafamnum-24-04-20.pdf

⁶ This analysis is available in more at details in EL*C (2023): Making the invisible visible, a first analysis of older lesbians lived experiences. https://europeanlesbianconference.org/wp-content/uploads/2023/03/Making-the-Invisible-Visible-an-analysis-of-older-lesbians-lived-experiences_ELC-research.pdf



EU's capacity to effectively address disparities in healthcare, housing, education, employment, and political participation.

Despite the growing visibility of LBTIQ rights issues, major gaps persist in how data is collected, analysed, and used. Member States often lack national-level studies or disaggregated equality data, and many do not report such data in alignment with GDPR standards. At the same time, inclusion of LBTIQ indicators in existing EU instruments, such as the Gender Equality Index, remains inconsistent or entirely absent.

The EU must take active steps to close this gap. This includes encouraging oversampling in surveys, promoting intersectional methodologies, and ensuring that equality data systematically captures the realities of LBTIQ people across all domains. Member States should be required to submit disaggregated equality data, and dedicated discussions on LBTIQ women and other underrepresented groups should be held within the LGBTIQ Equality Subgroup.

3. Hate Speech, Hate Crimes and Harassment

LBTIQ women are uniquely targeted by hate speech, hate crimes, and other forms of violence and harassment—both online and offline—that combine misogyny and sexism with stigma against non-conforming sexual orientations and gender expressions. Across the European Union, EL*C has observed a concerning rise in such violence in recent years, manifesting in diverse forms: from domestic abuse and cyber-harassment to hate crimes in public spaces, "corrective" rape, honour-based violence, and femicides. Notably, there has been a marked increase in digital hate and physical assaults directed at publicly visible lesbians, including activists, politicians, and other women in the public eye. This is in line with the FRA LGBTIQ Survey III showing "high levels of violence and harassment across all 30 countries surveyed and an increase compared with the results of the 2019 survey"⁷.

Between 2019 and 2024, EL*C documented attacks against LBTIQ women across the European Union via its Observatory on Lesbophobic violence and discrimination against lesbians⁸. These cases encompass various forms of violence, including physical hate

⁷ FRA (2024) LGBTIQ equality at a crossroads – Progress and challenges, https://fra.europa.eu/sites/default/files/fra_uploads/fra-2024-lgbtiq-equality_en.pdf

⁸ Countries included were Belgium, Bulgaria, Croatia, France, Germany, Greece, Ireland, Italy, Netherlands, Portugal, Romania, Slovakia, Slovenia, Spain see for more details: EL*C (2025): Annual report of the Observatory on lesbophobic violence and discrimination against lesbians – 2024 https://lesbiangenius.org/wp-content/uploads/2024-Observatory_final-report.pdf



crimes, online hate speech and harassment, state-sponsored lesbophobia, violence in healthcare and educational settings, as well as in public spaces, and attacks on activists and public figures. This escalation of violence and normalisation of hate speech is not limited to national or online contexts—it also affects institutional spaces. Research shows that even the European Parliament is not immune, with anti-gender actors strategically using disinformation and coded language to frame LGBTIQ+ and women's rights as ideological threats, thereby contributing to the legitimisation of hate under the guise of political debate⁹.

Online violence against LBTIQ women is a growing concern. EL*C's Annual Observatory has consistently documented a sharp increase in online harassment, particularly targeting LBTIQ women¹⁰. Patriarchal and misogynistic behaviours are increasingly visible online, with lesbophobic and sexist insults spreading through comments, tweets, and posts. Public-facing women, such as politicians, journalists, and influencers, are especially targeted. This violence limits LBTIQ women's digital presence and freedom of expression. Many public figures report rape and death threats via social media and describe elaborate strategies to avoid exposure to cyber-harassment. This form of violence not only harms mental health but also silences voices and restricts democratic participation¹¹.

Offline, LBTIQ women also face significant risks in public spaces. Acts of affection between lesbian couples are frequently met with hostility or assault, particularly when the couple challenges gender norms. Many cases involve couples being harassed or attacked after refusing to conform to male fantasies or respond to demands such as kissing in front of men or "letting them join." Other cases concern attacks during pride and other demonstration,

⁹ RESIST project (2024): European Parliament Case Study Findings https://theresistproject.eu/sdc_download/578/?key=x1wmouvw9whb01mnpofeyg3tgkqhd8

¹⁰ Preliminary results from 2025 EL*C research on online violence against LBTIQ women shows that lesbian and bisexual women are more often exposed to online harassment and violence (between 28%-48 – depending on the country) than heterosexual women (10%-18% depending on the country). The report is not yet published but is available upon request.

¹¹ The 2022, 2023 and 2024 reports of the Observatory are available here: https://lesbiangenius.org/publications/ National data collected within the Observatory confirms this trend. In Hungary and Portugal, EL*C received reports of increased online hate and threats, including verbal and sexual violence, particularly during the COVID-19 lockdowns.

¹² EL*C Observatory has collected several cases from Italy, France, the Netherlands and according to SOS Homophobie 2023 report, 63% of the over 150 lesbophobic incidents registered in France targeted couples https://ressource.sos-homophobie.org/Rapports_annuels/Rapport_LGBTlphobies_2023.pdf



sometime with tragic consequences as in Germany, where a transgender man was beaten to death while defending a group of lesbians during Pride¹³.

Gender expression is also a common trigger: LBTIQ women and non-binary persons who do not conform to feminine stereotypes are targeted for "looking too masculine" or "challenging male dominance." Such attacks attempt to police female behaviour and punish visible queerness. These findings confirm that violence against LBTIQ women is at the same time gender-based violence and violence related to stigma on non-conforming sexual orientation and gender expression. Yet responses remain fragmented and insufficient. EU and national authorities must ensure targeted prevention and response measures—including in digital and public spaces—and fund community-led monitoring and support structures.

Underreporting of violence against LBTIQ women remains a major barrier to justice and visibility across the EU. According to the 2023 FRA LGBTIQ Survey, the overwhelming majority of survivors have not reported the most recent incident (82% of lesbians - cis and trans - respondents) due to fear of secondary victimization, mistrust in law enforcement, or previous experiences of dismissal. Such fears appear to be justified as EL*C's 2024 analysis on the Istanbul Convention's implementation across EU member states found that protection, prevention, and access to justice remain insufficient for LBTIQ women across Europe¹⁴

These results are confirmed by the cases recorded in the EL*C Observatory where several incidents were underreported or misclassified by law enforcement. For instance, in Bulgaria, an attack on a lesbian activist by a prominent national political figure was charged merely as "hooliganism," with no aggravating circumstances considered ¹⁵. In Croatia, a lesbian woman was violently attacked in a Zagreb nightclub after refusing a man's advances and disclosing her sexual orientation and the aggressor was subject only to a minor fine ¹⁶. In Italy, a lesbian woman was killed by a man she had rejected, explicitly because she was not

¹³ https://www.theguardian.com/world/2022/sep/02/transgender-man-dies-after-pride-parade-assault-ingermany

¹⁴ Mestre i Mestre R., De Vido S., EL*C (2024): Lesbianising the Istanbul Convention. Research on the Implementation of the Convention to Protect LBT Women https://lesbiangenius.org/wp-content/uploads/Lesbianising-the-Istanbul-Convention-report.pdf

¹⁵ https://www.rferl.org/a/bulgaria-lgbt-rasate-attack/31544540.html

¹⁶ Sabalic v. Croatia ECHR, Application no. 50231/13 https://hudoc.echr.coe.int/eng?i=001-207360



interested in a relationship with him, the murder was not classified as femicide, resulting in a reduced sentence¹⁷.

These attacks are part of a broader pattern of hate and violence that must be explicitly addressed in both EU hate crime frameworks as well as in legislation aimed at combating gender-based violence. The EU must push forward the inclusion of sexual orientation, gender identity and gender expression in the list of Euro-crimes, and support enforcement mechanisms that acknowledge the intersectional nature of violence against lesbians. The implementation of the Directive on Violence Against Women must include a specific attention to LBTIQ women. Online platforms must be held accountable under the Digital Services Act for failing to moderate misogynist and lesbophobic content, and the word "lesbian" should no longer be algorithmically associated with pornographic or hypersexualized content.

4. Socio-Economic Inequalities and Housing

Patriarchy, sexism, misogyny, and lesbophobia are not abstract or isolated phenomena—they are entrenched systems of inequality that continue to shape the lived experiences of LBTIQ women, particularly within the labor market and workplace environments. These intersecting forms of discrimination contribute to the systemic exclusion and marginalization of LBTIQ women across all stages of economic participation.

Access to, and treatment within, the labor market is deeply gendered. It is now a well-documented reality that women in general face significant structural barriers in employment, including higher rates of joblessness, concentration in lower-paid and precarious occupations, and persistent gender pay gaps. Women are also markedly underrepresented in leadership roles and across numerous professional sectors. During times of economic crisis, women are disproportionately affected, often being the first to lose their jobs and the last to recover. For LBTIQ women, these challenges are even more pronounced.

In addition to the systemic disadvantages experienced on the basis of gender, they are subjected to further layers of discrimination due to their sexual orientation, gender identity, and gender expression. These compounding factors result in higher levels of exclusion, discrimination, and harassment—both in accessing employment and in day-to-day

¹⁷ https://www.corriere.it/cronache/20_agosto_24/elisa-pomarelli-oggi-funerali-ragazza-lesbica-uccisa-2019-il-suo-omicidio-non-verra-giudicato-come-femminicidio-768c9726-e56d-11ea-b5c1-ffe7ca7d9551.shtml



workplace experiences. The cumulative impact severely limits their economic autonomy, security, and professional development.

LBTIQ women, particularly racialized, disabled, or older women, face heightened levels of economic exclusion. EL*C's 2021 COVID-19 survey¹⁸ and EL*C's 2023 research on older lesbians¹⁹ show a significant prevalence of precarious employment (40%) and risk of poverty and homelessness. Since socio-economic risks increase with age, it is not surprising that EL*C data on older lesbians show that 20% of older lesbians who replied to the 2019 FRA LGBTI Survey II reported housing difficulties—double the rate of older gay men. Many are excluded from inheritance and home ownership due to family rejection or the lack of legal recognition for lesbian families²⁰.

In general, for lesbian-headed households, compounded effects of the gender pay gap, limited access to family benefits, and discrimination in employment result in lower pensions and long-term insecurity. The lack of recognition of LGBTI families also increases socioeconomic vulnerability, particularly in cases of separation or the death of a partner. These is especially concerning in cases of couples with children, because without a formal recognition of the couples or parental relationships, the non-legal (social) parent may be unable to access benefits or unwilling to cover child-related expenses in case of separation, leaving families unprotected. Socio-economic risks are especially relevant to those who are migrants or from marginalized ethnic communities²¹.

For these reasons, the implementation of the Pay Transparency Directive must include a monitoring of how multiple and intersectional discrimination are addressed. Housing policies and anti-poverty measures must explicitly name LBTIQ women's households as a target group. Recognition of LGBTIQ families and social parenthood remains a key element to ensure socio-economic stability to LBTIQ women's households and therefore should be guaranteed and encouraged in all Member States.

¹⁸ EL*C (2021): Resistance as a Way of Living: Lesbian lives through the COVID-19 Pandemic https://europeanlesbianconference.org/wp-content/uploads/2021/06/Covid-Report-final-1.pdf

¹⁹ EL*C (2023): Making the invisible visible, a first analysis of older lesbians lived experiences. https://europeanlesbianconference.org/wp-content/uploads/2023/03/Making-the-Invisible-Visible-ananlysis-of-older-lesbians-lived-experiences_ELC-research.pdf

²⁰ EL*C (2023): Making the invisible visible, a first analysis of older lesbians lived experiences. https://europeanlesbianconference.org/wp-content/uploads/2023/03/Making-the-Invisible-Visible-ananalysis-of-older-lesbians-lived-experiences_ELC-research.pdf

²¹ EL*C (2025), Intersectionality in action — When racism gets in the way of LBQ women and non-binary persons. Lived Realities of Black, Racialized, Roma, and Central Asian lesbians* in the EU https://lesbiangenius.org/wp-content/uploads/Racialized_Lesbian_Report.pdf



5. Civil Society Engagement and Support

The Strategy must recognize that civil society organizations working on LGBTIQ equality—especially those led by LBTIQ women—face intersecting and systemic barriers. These include chronic underfunding, shrinking civic space, limited access to decision-makers, and persistent safety threats, all worsened by the current political backlash. There is now overwhelming evidence of the financial marginalisation of LBTIQ-led organisations in Europe, and the situation is deteriorating in the face of coordinated anti-rights campaigns.

These challenges are further compounded by the intensifying anti-LGBTIQ+ and antifeminist backlash documented across Europe. The Horizon Europe-funded project RESIST found that anti-gender movements have become increasingly coordinated, well-funded, and transnational—operating across legal, media, religious, and political fronts²². In several EU Member States, these actors have directly influenced public policy, resulting in restrictions on civil society's ability to access funding, engage in advocacy, and operate safely ²³. The project underscores how activists, particularly those with feminist and intersectional agendas, are among the first targets of attacks that range from social to economic to psychological. Structural disinformation campaigns, threats to physical safety, and smear tactics not only endanger individuals but also delegitimise human rights work in the eyes of the public²⁴. These findings confirm the urgent need for stronger EU-level safeguards to protect civil society space, including proactive political support, accessible and flexible funding, and legal instruments that shield advocacy organisations from arbitrary restrictions or defamation.

EU funding—particularly through the CERV programme—has been essential for LBTIQ women's civil society organisations, which had previously been among the most underfunded within EU frameworks. Despite this progress, these organisations continue to

²² RESIST Project Team. (2024). The RESIST Project Report: National and Transnational Findings on the Formation of Anti-Gender Politics.

https://theresistproject.eu/sdc_download/980/?key=dd7usqfers4bhgbssprwna7rjeo94x

²³ RESIST Project mapped how 'anti-gender' politics are produced and expressed in contemporary Europe focusing on mediatic and political discourses in the UK, Poland, Switzerland, Hungary and the European Parliament between 2016 and 2022. The detailed results of the mapping are available here: https://theresistproject.eu/sdc_download/980/?key=dd7usqfers4bhgbssprwna7rjeo94x

²⁴ RESIST Project analysed the impact of 'anti-gender' politics on everyday lives and forms of resistance, using data gathered via interviews, focus groups and a survey across 9 case studies: Belarus, people living in exile in Europe, France, Germany, Greece, Ireland, Poland, Spain (Catalonia & Basque Country) and Switzerland. Detailed results are available here: Kiening M., Blidon M, Rodó-Zárate M., and Freude L. (2024). The RESIST Project Report Effects of, and Resistances to 'Anti-Gender' Mobilisations Across Europe: A Report on Transnational Findings.



receive only a small share of overall LGBTIQ funding globally, with an even smaller portion allocated to groups within the European Union.

The most recent data published by the Global Philanthropy Project in 2024, shows that only 2% of global LGBTIQ funding goes specifically to improving the position of women of the LGBTIQ community ²⁵. EL*C's own assessment confirms this gap: 65% of its member organisations operate on annual budgets below €25,000, and 24% on less than €5,000— often relying on informal fundraising to sustain their activities ²⁶.

To build a resilient LBTIQ women's civil society, EU funding instruments must explicitly name LBTIQ women as a target group in both programme design and funding calls. The Commission must simplify access to funding, reduce administrative burdens, and prioritise operational (not just project-based) support. CERV regranting schemes—through both Framework Partnership Agreements and Daphne grants—have proven effective and should be maintained and expanded. Additionally, the Commission should participate more regularly and at higher political levels in events organized by Framework Partners, including study visits and civil society-led dialogues.

Supporting LBTIQ CSOs is particularly key given the deteriorating political landscape. RESIST conducted one specific case study on anti-gender operating within the European Parliament. These actors strategically use parliamentary tools—resolutions, committee interventions, and public discourse—to disseminate anti-LGBTIQ+ and anti-feminist narratives under the guise of protecting "freedom," "children," or "the family." The report documents how these practices legitimise disinformation, normalise hate speech, and hollow out EU equality commitments from the inside ²⁷. Crucially, these findings were collected before the 2024 European elections, which brought a further rise in far-right representation — suggesting the current situation may be even more severe. In this context, it is more urgent than ever for the European Commission to ensure sustained and reinforced support for advocacy and watchdog work by civil society. The defence of EU values cannot rely solely on institutional actors: civil society must be equipped and resourced to resist disinformation, push back against anti-rights narratives, and uphold equality, democracy, and human rights across the EU.

²⁵ GPP (2024), "Global Resources Report: Government and Philanthropic Support to LGBTI Communities" https://globalresourcesreport.org/wp-content/uploads/2024/06/GRR_2021-2022_WEB-SinglePage-BW_EN.pdf

²⁶ EL*C (2023) Capacity Assessment of EL*C members (not published, available upon request)

²⁷ RESIST project (2024): European Parliament Case Study Findings https://theresistproject.eu/sdc_download/578/?key=x1wmouvw9whb01mnpofeyg3tgkqhd8



This is not only a question of visibility and participation—it is a matter of democratic integrity. In the face of growing anti-gender movements, well-funded and coordinated political pressure to eliminate financial support for feminist and LGBTIQ movements, the Commission must not shy away from supporting civil society as agents of change and active actors within EU policymaking. Civil society must be empowered to shape EU values and priorities and contribute meaningfully to their implementation. This is essential to protecting human rights and democracy across the Union.

6. External Actions and Enlargement

LBTIQ women human rights defenders in third countries face increasing repression, legal obstacles, and targeted violence. As stated in the EU Guidelines to promote and protect the enjoyment of all human rights by LGBTI persons: "lesbian and bisexual women, trans, intersex and gender-variant persons make up a significant part of the LGBTI group and are particularly vulnerable to gender-based and sexual violence. Also, women's civil society groups and organisations frequently play an important role in promoting and protecting the human rights of LGBTI persons, particularly in countries where LGBTI organisations are not permitted."²⁸

Ensuring freedom of expression and assembly, as well as the safety of LBTIQ human rights defenders, is key to advancing LGBTI rights globally. The current global backlash against feminist and LGBTI activists constitutes a major obstacle. EL*C's Annual Observatory on Lesbophobia found that in countries such as Serbia, Georgia, Turkey, and Ukraine, activists experience bans on Pride events, smear campaigns, and threats to physical safety²⁹. The case of Feminita in Kazakhstan—denied legal registration for over a decade and whose leading activist was recently imprisoned for holding a peaceful feminist demonstration³⁰—illustrates a broader regional pattern of state hostility and shrinking civic space for LBTIQ women's organising.

The situation is worsened by a rapidly deteriorating global funding landscape for gender equality and LGBTIQ+ rights, including the reintroduction of the Global Gag Rule, significant cuts to USAID, and the labelling of organisations receiving foreign funding as "foreign

²⁸ EU Guidelines to promote and protect the enjoyment of all human rights by lgbti persons https://www.eeas.europa.eu/sites/default/files/07_hr_guidelines_lgbti_en.pdf

²⁹ EL*C (2025): Annual report of the Observatory on lesbophobic violence and discrimination against lesbians – 2024 https://lesbiangenius.org/wp-content/uploads/2024-Observatory_final-report.pdf

³⁰ https://lesbiangenius.org/kazakhstan-arrests-feminist-activist-for-demanding-justice-in-a-brutal-femicide-case/



agents." This trend is likely to worsen, putting at risk the survival of organisations working in hostile or under-resourced contexts. The EU must urgently step up its foreign aid commitments and actively encourage Member States to maintain—and where possible, increase—their international funding for human rights and equality. Innovative funding mechanisms, such as re-granting schemes and CSO intermediaries that have proven successful internally, must be bolstered and expanded for external action.

EU external action must adopt a gender-sensitive LGBTIQ strategy that goes beyond decriminalisation to actively protect LBTIQ women from threats such as honour-based violence, corrective rape, and property disinheritance. Areas particularly relevant for LBTIQ women include the right to free and full consent to marriage; land, housing, and property rights; freedom from violence based on gender expression; freedom from violence and discrimination at work; freedom of movement and the right to appear in public without fear of violence; parental rights and the right to create a family; the right to asylum; the right to health, including services for sexual, reproductive, and mental health; protection and recognition as human rights defenders; and access to justice.

With regard to multilateral mechanisms, the EU must redouble its commitment in both gender equality fora and those dedicated to sexual and gender diversity by defending inclusive interpretations in gender-equality bodies. These spaces—such as the UN Commission on the Status of Women (CSW), the Beijing+ review processes, and the Committee on the Elimination of Discrimination Against Women (CEDAW)—are increasingly pressured to define equality as between cisgender, heterosexual women and men. The EU must "hold the line" by ensuring that LBTIQ women are explicitly recognised in policy language and negotiated outcomes. It should also actively engage in the Equal Rights Coalition and other informal gatherings of member states, and participate more fully in the Coalition's working groups on diplomacy, laws, funding, and development.

Enlargement remains especially important for LBTIQ women in the region and offers a unique opportunity for the EU to advance LGBTI rights in Europe. EU delegations and enlargement instruments must ensure sustained dialogue with LBTIQ civil society, support capacity-building and protection measures, and structurally include LBTIQ groups in human rights and gender equality programming. These steps are essential to upholding the EU's commitment to equality, democracy, and human rights beyond its borders.



Conclusion and Key Recommendations

The upcoming LGBTIQ Strategy offers a critical opportunity to ensure that LBTIQ women's perspectives and needs are no longer overlooked. The European Commission must move beyond rhetorical inclusion and take structural, well-resourced, and intersectional actions. With appropriate legal frameworks, inclusive policies, and sustainable funding, the EU can become a true Union of Equality.

EL*C stands ready to support the Commission in this vital work and offers these key recommendations:

1. Explicitly Include LBTIQ Women Across All Strategic Pillars

- Name **LBTIQ** women as a priority group in all areas of the Strategy, ensuring visibility in action areas such as conversion practices, hate crime and hate speech, health, education, socio-economic rights, and EU external action.
- Avoid relying solely on "gender stereotypes" as a proxy for addressing the needs of LBTIQ women.

2. Address Conversion and Corrective Practices Without Harming Trans Rights

- Support Member States through exchange of good practices and survivor-informed models.
- Invest in **training** for mental health professionals, community-based **support services** as well as **data collection** with attention to how intersecting identities such as gender, racial and ethnic origin, religion, and disability shape conversion practices' experiences.
- Avoid EU-level legal instruments that risk to be misused against the selfdetermination of trans and non-binary people.

3. Improve Disaggregated and Inclusive Equality Data

- Improve disaggregated and intersectional data collection by encouraging oversampling of underrepresented groups—such as LBTIQ women, older individuals, and racialised communities—in future FRA LGBTIQ surveys.
- Ensure inclusion of LBTIQ indicators in the Gender Equality Index
- Support the use of intersectional methodologies in EU-funded research



 Require Member States to collect and report disaggregated national equality data and establish dedicated discussions on LBTIQ issues within the LGBTIQ Equality Subgroup.

4. Address Gender-Based and SOGIESC-Based Violence and Harassment Against LBTIQ Women (both online and offline)

- Integrate LBTIQ-specific dimensions into gender-based violence prevention and protection frameworks, including the **Directive on Combating Violence against**Women and Domestic Violence and the Victims Rights Directive.
- Push forward the inclusion of sexual orientation and gender identity in the list of Euro-crimes
- Ensure that social media companies are held accountable under the **Digital** Services Act for failing to moderate misogynistic and lesbophobic content and address the algorithmic association of the word "lesbian" with pornographic or hypersexualised material.
- Fund community-based support services and training for professional and service providers focusing on the specificities of violence against LBTIQ women especially via the CERV and Daphne programmes and their future iterations.

5. Tackle Socio-Economic Inequalities Faced by LBTIQ Women

- Recognise and address the specific socio-economic disadvantages experienced by LBTIQ women, including precarious employment, housing insecurity, and exclusion from family rights.
- Strengthen enforcement of non-discrimination in employment by addressing intersectional barriers faced by LBTIQ women in hiring, career progression, and workplace safety, and ensure that EU labour market policies and monitoring frameworks explicitly reflect their realities.
- Ensure LBTIQ women are explicitly included in anti-poverty, housing, and employment policies at EU and national levels, including in the implementation of measures aimed at tackling the gender pay gap such as the Pay Transparency Directive.

6. Recognise and Sustain LBTIQ Women's Civil Society as a Democratic Actor



- Ensure the structured participation of **LBTIQ women's civil society in all stages of EU policymaking**, including access to high-level spaces, cross-service collaboration and engagement beyond DG JUST.
- Continue to fund national and grassroot actions via the expansion of innovative mechanism as the re-granting schemes, under CERV programme and its future iteration
- Secure long-term and adequate funding for watchdog activities and contribution to policymaking at both national and EU levels via operational funding for European networks.

7. Mainstream LBTIQ Inclusion in External Action and Enlargement

- Protect and fund LBTIQ civil society in neighbourhood and accession countries, improving financial support, political participation and inclusion in EU human rights and gender equality dialogues.
- Adopt a gender-sensitive LGBTIQ strategy in EU external action that goes beyond
 decriminalisation to address the specific realities of LBTIQ women, including
 protection from gender-based violence, access to sexual and reproductive health
 and rights, asylum rights, legal recognition of family and parental rights, and address
 the limitations to land, property, and right to free and full consent to marriage.
- Scale up EU foreign aid to counter shrinking global funding and repression, including through flexible mechanisms like re-granting schemes and support to feminist and LBTIQ human rights defenders.
- Defend inclusive gender equality in multilateral fora (CSW, Beijing+, CEDAW) and reinforce EU engagement in LGBTI-specific spaces such as the Equal Rights Coalition.