








ENACT – Enhancing the capacity of civil society organisations to support victims of anti-LGBTIQ hate crimes

POLICY RECOMMENDATIONS FOR
NATIONAL AND TRANSNATIONAL
PUBLIC BODIES IN THE EU



Enhancing the capacity of civil
society organisations to support
victims of anti-LGBTQI hate crimes

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Executive Summary

This comprehensive policy document presents evidence-based recommendations for strengthening hate crime victim support across the European Union, with particular focus on anti-LGBTQI hate crimes. These recommendations are informed by the ENACT project research across six EU Member States and aligned with the EU LGBTQI+ Equality Strategy 2026–2030 as well as Council of Europe standards.

Priority Actions for Immediate Implementation (Within 2 Years)

- 1. Legislative Harmonization:** Advance EU legislative initiative to harmonize hate crime definitions, including sexual orientation and gender identity as protected grounds across all Member States.
- 2. National Action Plans:** All Member States adopt comprehensive national LGBTQI+ equality action plans by end 2027, with specific provisions for hate crime prevention and victim support.
- 3. Stable Civil Society Funding:** Transition from project-based to multi-year operational funding for LGBTQI+ civil society organizations providing specialised victim support services.
- 4. Mandatory Professional Training:** Establish mandatory elaborate training programmes for law enforcement, prosecutors, and judges on hate crime identification and victim-sensitive responses.
- 5. Third-Party Reporting Systems:** Implement safe reporting mechanisms allowing victims to report through trusted civil society organizations, with guaranteed confidentiality.

EU Policy Context

The EU LGBTQI+ Equality Strategy 2026–2030 (hereinafter: EU Strategy), adopted in January 2026, establishes a comprehensive framework for protecting and empowering LGBTQI+ people. The strategy emphasizes three pillars: Protect, Empower, and Engage. The current recommendations directly support the implementation of the strategy's objectives, particularly:

- Combating hate speech and hate crime, including exploring legislative initiatives to harmonize hate offence definitions;
- Strengthening victim support through a revised Victims' Rights Directive;



- Combating conversion practices through Member State guidance and EU-level action;
- Enhancing equality data collection through new Commission Recommendation; and
- Supporting civil society through expanded AgoraEU funding.

Current Hate Crime Situation

Recent data from FRA's 2023 LGBTIQ Survey and ENACT Project research reveals persistent challenges:

- 37% of LGBTIQ people experienced discrimination in 2023 in the EU. Trans women (64%), trans men (63%) and intersex people (56%) experienced the highest discrimination rates within the LGBTIQ community.
- 13% of LGBTIQ respondents in the EU experienced physical or sexual attacks in the past 5 years, with transgender men (23%) and transgender women (29%) most affected.
- 55% experienced hate-motivated harassment (18 percentage point increase from 2019).
- 24% of LGBTIQ people experienced conversion practices.
- Up to 90% of hate crimes go unreported across ENACT partner countries, with 90% of LGBTIQ people not reporting their most recent incident of hate-motivated harassment to any organization or institution. Notably, non-reporting remains pervasive among transgender individuals.
- Legal frameworks remain fragmented: no EU-level protection against discrimination or hate crimes based on sexual orientation and/or gender identity beyond employment.

ENACT Research Methodology

The ENACT project (March 2024–February 2026) represents a comprehensive qualitative research on anti-LGBTQI hate crime victim experiences and systemic responses. This empirical research conducted across Spain, Slovenia, Greece, Hungary, Italy, and Lithuania:

- 79 in-depth interviews with hate crime victims (11 Greece, 12 Hungary, 20 Italy, 7 Lithuania, 10 Slovenia, 19 Spain) revealing the profound psychological and social impact of hate-motivated violence, detailed experiences with reporting and criminal justice systems, and critical gaps in support services;
- 71 interviews with key professionals (7 Greece, 9 Hungary, 20 Italy, 6 Lithuania, 12 Slovenia, 17 Spain) including law enforcement officers, prosecutors, judges,



lawyers, anti-discrimination body representatives, and NGO staff, documenting implementation challenges, training deficits, and coordination failures;

- 6 focus groups with 33 professionals in total (5–7 participants per country) facilitating cross-sectoral dialogue to identify best practices, systemic obstacles, and opportunities for improved inter-agency cooperation;
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Critical Findings

Underreporting Crisis

- Primary barriers: lack of trust in authorities, fear of exposure, fear of revictimization, language barriers for migrants, normalization of discrimination. A Lithuanian professional observed: *"The LGBTQ+ community has greatly normalised experiencing hate crimes and hate speech... it seems that if you're a queer person, you'll just naturally encounter some hatred,"*.
- Victims often lack awareness of reporting mechanisms and available support.

Implementation Gap

- While legal frameworks exist, practical application remains inadequate.
- Hate crimes are frequently prosecuted as ordinary offences, failing to recognize specific harm and bias motivation.
- Inadequate coordination persists between law enforcement and criminal justice agencies, victim support services, and civil society organizations (CSOs).

Service Fragmentation

- Victim support is predominantly provided by under-resourced CSOs.
- Services are concentrated in capitals and major cities, leaving rural victims severely underserved.
- CSOs rely on temporary project funding rather than stable operational support.

Issues Concerning Intersectionality

- Multiple discrimination factors compound vulnerability but are rarely addressed in policies. As one victim from Italy described: *"I always suffered from this double stigmatization as an Albanian immigrant and, even a f____t."*
- Data collection systems fail to capture intersectional patterns.



Priority Recommendations

These recommendations are organized into seven building blocks aligned with EU and Council of Europe standards:

1. Legislative and Policy Frameworks

Recommendation 1.1: Expand and Harmonize Hate Crime Legislation

All Member States should:

- Include sexual orientation, gender identity, gender expression and sex characteristics as protected grounds in binding hate crime legislation;
- Ensure that laws meant to protect against hate crimes include both specific (sui generis) hate crime offences and bias motivation as an aggravating circumstance for other crimes; and
- Adopt intersectional approaches that recognize and adequately address multiple and compounding forms of discrimination, ensuring that legal frameworks account for how protected characteristics intersect (such as race, religion, disability, age, and LGBTIQ+ identity) and provide enhanced protections where individuals face discrimination on multiple grounds simultaneously.

The European Commission should:

- Advance legislative initiative to harmonize online hate speech definitions (as announced in EU LGBTIQ+ Equality Strategy); and
- Support Council adoption of hate speech and hate crime as 'EU crimes' under Article 83(1) TFEU.

Recommendation 1.2: Combat Conversion Practices

Following the European Citizens' Initiative "Ban on conversion practices in the European Union" and aligned with EU Strategy commitments, Member States should:

- Prohibit conversion practices targeting LGBTIQ+ persons; and
- Provide support and compensation mechanisms to survivors of conversion practice committed by medical workers or religious actors.

Recommendation 1.3: National LGBTIQ+ Equality Action Plans

All Member States should adopt national action plans on LGBTIQ+ equality by 2027, including specific provisions for hate crime prevention and victim support. These should:

- Designate national coordinators on LGBTIQ+ equality;
- Include measurable objectives, timelines, and adequate funding; and
- Address rural and geographic inequalities in service provision.



2. Criminal Justice System Response

Recommendation 2.1: Mandatory Training

Establish mandatory initial and continuous training for:

- Police officers on hate crime identification, victim-sensitive interviewing and LGBTIQ+-specific competency;
- Prosecutors and judges on hate crime prosecution as well as administrative staff at court facilities on bias indicators, and discrimination from an intersectional perspective; and
- Training should be developed and provided in collaboration with LGBTIQ+ CSOs and victim support services.

Recommendation 2.2: Specialized Units and Prosecutors

- Establish specialized hate crime units or network of hate crime specialists within police forces;
- Designate specialized prosecutors for hate crime cases; and
- Create hate crime contact points in all law enforcement and prosecution offices.

Recommendation 2.3: Safe Reporting Mechanisms

- Establish online reporting platforms with confidentiality guarantees;
- Ensure that reporting does not adversely affect the residence status of migrant victims; and
- Facilitate third-party reporting systems allowing victims to report through trusted CSOs.

3. Victim Support Services

Recommendation 3.1: Stable Funding for Civil Society

Member States should:

- Ensure adequate and stable core funding of LGBTIQ CSOs offering victim support beyond project-based grants for victim support programs; and
- Implement safeguards preventing exclusion of CSOs offering victim support from funding because of their LGBTIQ+ advocacy work.

Recommendation 3.2: Comprehensive Victim Support

Member States are urged to:

- Ensure access of hate crime victims to psychological counseling, legal assistance, and practical support;
- Provide immediate individualized safety planning and risk assessment; and



- Offer peer-support groups facilitated by trained LGBTIQ+ community members.

Recommendation 3.3: Geographic Accessibility

Member States should:

- Establish support services in rural and underserved areas, not only capitals and major cities;
- Develop mobile outreach teams and online support services; and
- Provide travel cost reimbursement for socially vulnerable victims accessing services from remote locations.

4. Intersectional Approaches

Recommendation 4.1: Recognize how structures of domination render certain population groups more vulnerable than others

Aligned with EU Strategy's intersectionality principle and FRA findings on heightened discrimination for LGBTIQ+ persons with disabilities, migrants, and racialized individuals:

- Train professionals to identify intersectional devices of oppression and hate crime victimization patterns
- Ensure that support services address intersecting vulnerabilities (e.g. disability, migration status, racial/ethnic origin); and
- Collect disaggregated data capturing experiences of hate crime victims of intersecting identities facing multiple discrimination

Recommendation 4.2: Protection for LGBTIQ+ Asylum Seekers from Hate Crimes

LGBTIQ+ asylum seekers face heightened risk of hate crimes and violence in reception facilities and during asylum procedures. Therefore, we recommend implementing EU Strategy commitments and Pact on Migration and Asylum safeguards, particularly:

- Formally recognize sexual orientation, gender identity, gender expression, and sex characteristics (SOGIESC) as explicit grounds for refugee protection within national frameworks;
- Provide safe accommodation for LGBTIQ+ asylum seekers preventing violence and harassment in common housing facilities; and
- Ensure access to culturally competent healthcare for migrant victims of anti-LGBTIQ hate crimes.

5. Data Collection and Monitoring



Recommendation 5.1: Standardized Data Collection

Aligned with Commission's forthcoming Recommendation on equality data (EU Strategy commitment):

- Implement harmonized hate crime recording systems across Member States;
- Record all protected SOGIESC characteristics including sexual orientation, gender identity, gender expression, and sex characteristics;
- Capture data on multiple discrimination; and
- Publish disaggregated statistics annually.

Recommendation 5.2: Monitor Justice Outcomes

National law enforcement and justice bodies should:

- Track hate crime cases from reporting through prosecution to sentencing;
- Monitor attrition rates and identify systemic barriers to justice; and
- Analyze whether hate crime provisions are effectively applied in sentencing.

6. Countering Online Hate

Recommendation 6.1: Digital Services Act Enforcement

Given FRA finding that 63% of LGBTIQ people encountered hateful online content calling for violence, the EU should:

- Ensure rigorous enforcement of Digital Services Act obligations regarding illegal hate content;
- Monitor platform implementation of revised Code of Conduct on Countering Illegal Hate Speech Online; and
- Develop an action plan on cyberbullying affecting LGBTIQ+ youth (EU Strategy commitment for 2026).

Recommendation 6.2: Counter Disinformation

Member States should:

- Address information manipulation targeting LGBTIQ+ communities implemented by domestic and foreign actors; and
- Support media literacy initiatives challenging anti-gender narratives.

7. Prevention and Education

Recommendation 7.1: Inclusive Education

Given FRA finding that 67% of LGBTIQ people experienced bullying in school, public bodies should be provided with measures to:



- Exchange best practices on safe and inclusive education through European Education Area working groups;
- Implement anti-bullying policies explicitly protecting LGBTIQ+ students; and
- Train teachers on LGBTIQ+ inclusion and responding to bias-based bullying.

Recommendation 7.2: Public Awareness Campaigns

National public bodies in cooperation with CSOs, should:

- Develop national campaigns challenging prejudice, improving trust in law enforcement and criminal justice agencies and promoting hate crime reporting;
- Support the public recognition of the International Day Against Homophobia, Transphobia and Biphobia (17 May) through official statements, awareness campaigns and policies; and
- Remove any barriers to the organization of and ensure safe access to LGBTIQ+ Pride and awareness events.



Implementation Framework

Immediate Actions (2026–2027)

- Member States adopt national LGBTIQ+ equality action plans by the end 2027, with Commission facilitation through guidance documents and funding support;
- Commission publishes study on conversion practices and Recommendation on equality data;
- Establish an LGBTIQ+ Policy Forum with civil society;
- Strengthen the mandate of the expert group on LGBTIQ+ equality; and
- Launch cyberbullying action plan.

Medium-term Actions (2027–2029)

- Member States harmonize hate crime legislation to include sexual orientation, gender identity, gender expression, and sex characteristics as protected grounds, supported by EU coordination and model legislation guidance;
- Member States implement standardized hate crime data collection systems, with EU facilitation of harmonized methodologies and technical support;
- All Member States establish specialized hate crime units or networks and prosecutors, with EU support for cross-border cooperation and knowledge exchange;
- Member States implement mandatory training for criminal justice professionals, leveraging the existing hate crime training initiatives and resource materials of CEPOL (European Union Agency for Law Enforcement Training);
- Launch Union of Equality communication campaign; and
- Publish new Eurobarometer on discrimination (2027).

Long-term Actions (2028–2030)

- Commission mid-term review of LGBTIQ+ Equality Strategy (2028);
- FRA conducts fourth comprehensive LGBTIQ Survey (published 2029);
- Commission and Member States establish stable multi-year funding frameworks for LGBTIQ+ civil society organizations through dedicated budget lines in national equality action plans and EU funding programmes;
- Support the establishment of comprehensive and accessible victim support networks including rural areas; and



- Commission facilitates Member State efforts to increase hate crime reporting and successful prosecutions through knowledge exchange, model legislation, and monitoring frameworks, with annual progress reviews.

Monitoring and Accountability

- Annual reporting by Member States on hate crime statistics and action plan implementation;
- Commission monitoring through infringement procedures where EU law not properly implemented;
- FRA regular surveys and reports on discrimination and hate crime;
- Civil society shadow reporting on implementation gaps; and
- LGBTIQ+ Policy Forum annual review of progress.



Conclusion

The ENACT project has documented persistent and urgent challenges facing LGBTIQ+ communities: massive underreporting of hate crimes, fragmented support services, inadequate criminal justice responses, and overlooked intersecting vulnerabilities.

These evidence-based recommendations provide concrete policy actions to address these gaps. They align with and strengthen the implementation of the EU LGBTIQ+ Equality Strategy 2026–2030, translating its framework into practical measures for protecting and empowering LGBTIQ+ people across Europe.

Effective implementation requires sustained commitment from EU institutions, Member States, regional and local authorities, equality bodies, civil society organizations, and allies.

By 2030, successful implementation is expected to result in:

- Harmonized hate crime legislation protecting sexual orientation, gender identity, gender expression, and sex characteristics across all Member States, following the adoption of the Council Decision extending Article 83(1) TFEU and subsequent directive on minimum rules for hate crime and hate speech definitions and sanctions.
- Measurable increase in hate crime reporting rates and successful prosecutions, with transparent monitoring of conviction rates and sentencing practices.
- Consistent application of aggravated sentencing provisions for hate-motivated offenses across Member States.
- Effective enforcement mechanisms ensuring non-discriminatory access to justice for LGBTIQ+ victims.

These recommendations represent a fundamental commitment to hate crime victims: to hear them, believe them, support them, seek justice for them, and work toward a society where all people can live free from fear, discrimination, and violence.

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Key References

EU Policy Documents

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- European Parliament (2024). Resolution on the implementation of the EU LGBTIQ Equality Strategy 2020–2025 (2023/2082(INI)).
- Ministerial Declaration by 20 Member States (2024). Calling for a renewed LGBTIQ+ equality strategy.

Research and Data

- FRA (2023). EU LGBTIQ Survey III: Being LGBTIQ+ in the EU. European Union Agency for Fundamental Rights.
- FRA (2023). Being intersex in the EU: Challenges faced by intersex people. European Union Agency for Fundamental Rights.
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- Eurobarometer (2023). Special Eurobarometer on discrimination in the EU.
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International Standards

- OSCE-ODIHR (2024). Hate Crime Prosecution at the Intersection of Hate Crime and Criminalized 'Hate Speech': A Practical Guide.
- Council of Europe (2010). Recommendation CM/Rec(2010)5 on measures to combat discrimination on grounds of sexual orientation or gender identity.
- Council of Europe (2024). Committee of Experts on Sexual Orientation, Gender Identity and Expression, and Sex Characteristics: Mandate and work programme.
- UN Independent Expert on SOGI (2020). Practices of so-called 'conversion therapy': Report A/HRC/44/53.



APPENDIX: Legal and Policy Framework

EU Legal Instruments

These recommendations support implementation of:

- EU Charter of Fundamental Rights (Articles 21, 23) – non-discrimination and equality.
- Victims' Rights Directive (2012/29/EU) – comprehensive victim support.
- Employment Equality Directive (2000/78/EC) – workplace discrimination.
- Directive on Combating Violence Against Women and Domestic Violence (2024/1385) – gender-based violence including cyber hate based on gender, recognizing LGBTI people at greater risk.
- Digital Services Act – illegal online content including hate speech.
- Equality Body Directives (2024/1499, 2024/1500) – strengthened equality bodies;
- EU LGBTIQ+ Equality Strategy 2026–2030 – comprehensive framework.
- Commission proposal to extend Article 83(1) TFEU EU crimes list to include all forms of hate crime and hate speech (COM(2021) 777, pending Council adoption) – would enable a comprehensive EU-wide criminal law framework.

Council of Europe Standards

- Recommendation CM/Rec(2023)2 on rights, services and support for victims of crime.
- Recommendation CM/Rec(2024)4 on hate crimes.
- Recommendation CM/Rec(2010)5 on measures to combat discrimination on grounds of sexual orientation or gender identity.
- Committee of Experts on Sexual Orientation, Gender Identity and Expression, and Sex Characteristics (2024) – monitoring and standard-setting.
- European Court of Human Rights jurisprudence on LGBTI rights under Articles 8 (private life) and 14 (non-discrimination) of the ECHR.

ECRI Framework (Council of Europe)

- European Commission against Racism and Intolerance (ECRI) General Policy Recommendation No. 15 on Combating Hate Speech.
Available at:
<https://www.coe.int/en/web/european-commission-against-racism-and-intolerance/hate-speech-and-violence>



- ECRI General Policy Recommendation No. 17 on Preventing and Combating Intolerance and Discrimination against LGBTI Persons.

Available at:

<https://rm.coe.int/general-policy-recommendation-no-17-on-preventing-and-combating-intolerance/1680acb66f>

OSCE-ODIHR Framework

- Understanding Hate Crimes: A Handbook for Civil Society in the OSCE Region (2021).
- Preventing and Responding to Hate Crimes: A Resource Guide for NGOs in the OSCE Region (2023).
- Hate Crime Data-Collection and Monitoring: A Practical Guide (2022).
- Addressing Anti-LGBTI Hate Crimes: Training for a Professional Response (2021).
- Prosecuting Hate Crimes: A Practical Guide (2023).
- OSCE-ODIHR Hate Crime Victim Support Portal

Available at: <https://projects.osce.org/odihr/hate-crime-victim-support>

