



**Alternative Report of the Public Defender of Rights for the IV Review Cycle of the
Committee on Economic, Social and Cultural Rights, 79th Session (9 Feb 2026 - 6 Mar
2026), Slovakia**

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1. Introduction

The Public Defender of Rights (Ombudsperson) submits this alternative report to the UN Committee on Economic, Social and Cultural Rights (the Committee) ahead of Slovakia's examination during the IV Review Cycle at the 79th Session (9 Feb 2026 - 6 Mar 2026). This report underscores the Public Defender of Rights' concerns regarding Slovakia's adherence to key provisions of the International Covenant on Economic, Social and Cultural Rights.

Under Article 151a of the Constitution of the Slovak Republic, the Public Defender of Rights is an independent body tasked with safeguarding fundamental rights and freedoms, as defined by law, against violations by public administration bodies. Under Section 13(1) of Act No. 564/2001 Coll., the Ombudsperson acts based on complaints from natural persons or legal entities or on the Ombudsperson's own initiative.

The Ombudsperson's mandate encompasses the protection of fundamental rights and freedoms as guaranteed by the Constitution of the Slovak Republic and international conventions, including the International Covenant on Economic, Social and Cultural Rights.

Additionally, the Public Defender of Rights has served as the National Preventive Mechanism (NPM) since May 1, 2023.¹ The Public Defender of Rights also serves as the coordinating body for the NPM, facilitating cooperation among the three organizations, preparing a special report on NPM activities, and ensuring communication with the UN Subcommittee on the Prevention of Torture.

2. National human rights institutions and other independent oversight bodies (art. 2(1))

Article 2(1) of the Covenant obliges the State party to take steps, to the maximum of its available resources, to ensure the effective implementation of Covenant rights. The Office of the Public Defender of Rights plays an essential role in this regard, as it monitors the enjoyment of economic, social and cultural rights, investigates violations, issues recommendations and identifies systemic barriers. The Public Defender of Rights has explicitly identified poverty and the fight against it as one of his core priorities in the exercise of his mandate. As he stated in his annual report, "poverty, which is both a cause and a consequence of human rights violations, can be considered one of the most significant human-rights lessons for our society."²

In recent years, the Office of the Public Defender of Rights has experienced a steady increase in the number of complaints received, reflecting the growing public trust in the institution.³ Despite this upward trend, there has been no corresponding increase in financial or human resources to meet the growing workload. In 2025, while the Ministry of Finance did make an attempt to strengthen the Office by approving an increase of three staff positions, subsequent budgetary adjustments due to the government's fiscal consolidation measures in practice provided funding equivalent to approximately one additional administrative staff

¹ In Slovakia, the NPM mandate is shared among three independent organizations: the Public Defender of Rights, the Commissioner for Persons with Disabilities, and the Commissioner for Children. Each institution, based on its competencies, primarily conducts visits to facilities within its respective scope of authority.

² Public Defender of Rights, Annual Report 2023, p.18.

³ In 2024, the number of complaints rose by 7.2% compared to 2023, and during the first three quarters of 2025, it increased by 28.9% compared to the same period of the previous year.

member. The Office decided to allocate these funds to salaries in order to retain qualified personnel. As a result, despite the rising workload, the overall human and financial resources of the Office remain insufficient to ensure that all cases are handled within reasonable time limits and to the required professional standard.⁴

In March 2023, the Act on the Public Defender of Rights was amended to implement OPCAT and establish the National Preventive Mechanism. In connection with this amendment, the Government approved an increase of approximately €240,000 for 2023 and an addition of 6 staff positions. This adjustment, however, applied exclusively to the new NPM mandate and did not strengthen the capacity of the Office in relation to its core and pre-existing functions.

The persistent underfunding of the Office of the Public Defender of Rights significantly limits its ability to fulfil its functions in practice, including addressing systemic obstacles to the realisation of economic, social and cultural rights. The current budgetary constraints imposed on the Office weaken the national system of protection of economic, social and cultural rights.

International human rights bodies have repeatedly criticised the insufficient funding of the Office of the Public Defender of Rights. In its Concluding Observations of January 2025, the UN Committee on the Rights of the Child recommended that the Slovak authorities ensure adequate and sustainable long-term funding for the Office⁵, while in its Fifth Opinion on the Slovak Republic (2 February 2022), the Advisory Committee on the Framework Convention for the Protection of National Minorities of the Council of Europe urged the authorities “to provide sufficient human and financial resources to the Public Defender of Rights to enable this institution to effectively pursue its function.”⁶

Suggested Question for the List of Issues

In light of the State party’s obligation under article 2(1) of the Covenant to ensure the effective implementation of Covenant rights, how does the State party justify the continued underfunding of the Office of the Public Defender of Rights, particularly given the significant and ongoing increase in the number of complaints received by the institution? What concrete measures are planned to provide the Office with adequate, stable and long-term financial and human resources proportional to its expanding workload?

3. New Restrictions on NGOs in Slovakia: Analysis of Act No. 109/2025 on Non-Governmental Organizations

In its statement on human rights defenders and economic, social and cultural rights⁷, the Committee on Economic, Social and Cultural Rights stresses that civil society plays an essential role in the effective promotion, protection and realisation of economic, social and cultural rights, as well as in disseminating information about the Covenant and the Committee’s work. It also underscores that human rights defenders, including those working on economic, social and cultural rights, must be able to carry out their activities freely and

⁴ The Public Defender of Rights has faced a lack of sufficient human and financial resources for the full performance of its mandate since the institution's inception. Based on more than 20 years of experience, it can be concluded that the independence of the Public Defender of Rights, including personnel and budgetary independence as stipulated by the law on the Public Defender of Rights and international principles governing ombudsperson institutions, is not fully realized.

⁵ Committee on the Rights of the Child, Concluding observations on the sixth periodic report of Slovakia, CRC/C/SVK/CO/6, 31 January 2025, para. 12(b).

⁶ Advisory Committee on the Framework Convention for the Protection of National Minorities, Fifth Opinion on the Slovak Republic, 2022, p. 15. Available at: <https://rm.coe.int/5th-op-slovak-republic-en/1680a6e4ee>

⁷ E/C.12/2016/2

without fear, and calls on States to repeal legislation and remove measures that penalise or obstruct their work. Against this background, recent legislative developments in Slovakia raise serious concerns about the protection of civil society and human rights defenders.

In 2025, the Slovak Parliament adopted Act No. 109/2025 Coll. on Non-Governmental Organizations, following a highly dynamic legislative process initiated in 2024 by a group of Members of Parliament. The initial draft proposed, among other things, the possible dissolution of entities that failed to comply with sanctions or certain statutory obligations, as a last-resort measure after unpaid fines or persistent non-compliance. It also sought to introduce registration and labelling requirements for “organisations with foreign support”. Similar “foreign agents” or “foreign influence” laws have been adopted in Georgia, Hungary and the Russian Federation.

During this process, the Public Defender of Rights repeatedly warned the Members of the National Parliament, through several written submissions⁸, that a number of proposed provisions would unjustifiably interfere with the fundamental rights and freedoms of NGOs and their donors and would be inconsistent with the case law of the European Court of Human Rights and the Court of Justice of the European Union⁹. As a result of this engagement, several of the most problematic elements, in particular the labelling of NGOs as “foreign aid recipients” or as “lobbyists”, were removed before the law was adopted. However, the final version of Act on Non-Governmental Organizations still contains a set of contentious obligations that the Public Defender of Rights considers to be in breach of fundamental rights.

First, NGOs are required to publish overviews of their contributors, including their personal data (such as name and other identifying information) together with the amount of the contribution. Second, civic associations and organisations with an international element must publish detailed overviews of their income and expenditure. Third, all forms of NGOs are now classified as obliged entities under the Freedom of Information Act with respect to information on the use of funds received from public sources.

The Public Defender of Rights considers that the extensive donor-disclosure and financial transparency requirements, coupled with broad supervisory powers and potentially severe sanctions, amount to significant interferences with the rights to freedom of association and privacy and are not proportionate or necessary in a democratic society. These measures create a serious chilling effect on civil society, discouraging individuals and organisations from engaging in or supporting legitimate public-interest activities.

On 11 August 2025, the Public Defender of Rights submitted a constitutional petition¹⁰ to the Constitutional Court of the Slovak Republic, challenging several provisions of Act on Non-Governmental Organizations as incompatible with the Constitution, the European Convention

⁸Public Defender of Rights, *The amendment proposal to the Act on Non-Profit Organisations may disproportionately interfere with fundamental rights and freedoms. I recommend that Parliament adopt the legal regulation through the ordinary legislative procedure*, April 2025, available at: <https://vop.gov.sk/pozmenujuci-navrh-k-novele-zakona-o-neziskovych-organizaciach-moze-neprimerane-zasiahnut-do-zakladnych-prav-a-slobod-parlamentu-odporucam-prijat-pravnu-upravu-v-riadnom-legislativnom-procese/>

⁹ For example, the judgments of the European Court of Human Rights in *Kobaliya and Others v. Russia*, application no. 39446/16 and 106 others, and *Ecodefence and Others v. Russia*, applications nos. 9988/13 and 60 others; and the judgment of the Court of Justice of the European Union of 18 June 2020 in *Commission v. Hungary*, C-78/18.

¹⁰ Public Defender of Rights, *I will submit a petition for a constitutional review of the amendment to the Act on Non-Profit Organisations Providing Generally Beneficial Services*, May 2025, available at: <https://vop.gov.sk/podam-navrh-na-posudenie-ustavnosti-novely-zakona-o-neziskovych-organizaciach-poskytujucich-vseobecne-prospesne-sluzby/>

on Human Rights and the Charter of Fundamental Rights of the European Union. On 10 September 2025, the Constitutional Court admitted the petition in its entirety and will examine the contested provisions on the merits.

Relevant international bodies have raised similar concerns. On 14 October 2025, the Venice Commission concluded its opinion¹¹ that the amendment to the Act on Non-Governmental Organizations impermissibly restricts the fundamental right of non-governmental organisations to freedom of association, as well as the right to privacy of donors who voluntarily support NGOs and their activities. The amendment has negative effects on the fundamental rights and freedoms of civil society. The Venice Commission recommends that the amendment be repealed in its entirety.

Suggested question for the List of Issues

In light of the essential role of civil society and human rights defenders in the realisation of economic, social and cultural rights, how does the State party justify the adoption of Act No. 109/2025 Coll. on Non-Governmental Organizations, which the Venice Commission has found to unduly restrict freedom of association and negatively affect civil society, and what steps does it intend to take to revise or repeal the contested provisions to ensure an enabling environment for organisations working on Covenant rights?

4. Access to Innovative Medicines in the Exceptional Reimbursement Regime (arts. 2, 12 and 15(1)(b))

In his Annual Reports for 2022, 2023 and 2024¹², the Public Defender of Rights has repeatedly drawn attention to serious systemic deficiencies in the Slovak Republic's system of exceptional reimbursement of medicines, in particular regarding non-categorised and innovative treatments, and their impact on equal access to health care for patients in need.

Under the current legal framework, medicines that have not yet been included in the standard reimbursement list may be reimbursed only under an exceptional regime administered by health insurance companies. In practice, this mechanism lacks clear and uniform statutory criteria, grants insurers a wide margin of discretion and does not provide for prompt and independent review of negative decisions.

Access to exceptional reimbursement largely depends on the internal methodologies of individual health insurance companies rather than transparent rules laid down by law. As a result, patients with the same diagnosis, comparable clinical needs and identical medical indications may face radically different outcomes depending on their insurer. Such reliance on unpublished internal guidelines undermines legal certainty, equality of treatment and the principle that limitations on fundamental rights must be prescribed by law.

Access is further restricted by an annual expenditure cap for exceptional reimbursement. Once the cap is reached, health insurance companies deny reimbursement for the remainder of the year, regardless of the medical necessity of the treatment or the absence of alternative therapies. This design leads to situations in which insured persons do not have the same

¹¹ EUROPEAN COMMISSION FOR DEMOCRACY THROUGH LAW OF THE COUNCIL OF EUROPE, Slovak Republic – Opinion on Law No. 109/2025 amending the Law “on non-profit organisations providing services of general interest” and other related law, October 2025, available at: <https://www.coe.int/en/web/venice-commission/-/cdl-ad-2025-041-e>

¹² Public Defender of Rights, Annual Reports 2022, 2023, 2024, available here: <https://vop.gov.sk/vyrocné-spravy/>

access to care depending on whether their disease is diagnosed at the beginning or at the end of the budget year. It creates particularly serious barriers for patients with rare diseases or conditions requiring innovative therapies and raises concerns that purely fiscal considerations are allowed to override the essence of the right to health.

On 14 May 2025, in light of these systemic concerns, the Public Defender of Rights submitted a petition¹³ to the Constitutional Court challenging selected provisions of Act No. 363/2011 Coll. on the scope and conditions of reimbursement of medicines as incompatible with the Constitution and with the State party's obligations under articles 2 and 12 of the ICESCR, as well as other international human rights instruments.

The petition argues, inter alia, that the current framework allows internal rules of health insurance companies and rigid budgetary caps to determine access to essential and sometimes life-saving treatment, instead of clear statutory criteria based on medical need and the principles of equality and non-discrimination. In this context, the Public Defender of Rights has also drawn attention to the State's obligation under article 15(1)(b) of the ICESCR to ensure that the benefits of scientific progress, including innovative therapies, are made accessible in a fair and non-discriminatory manner.

A legislative amendment to the exceptional reimbursement regime is currently under discussion and includes several positive elements. However, the draft law still prioritises fiscal considerations of the State and health insurance companies over the medical needs of insured persons. In its current form, the proposed system may continue to restrict access to innovative medicines even where no alternative treatment exists and may therefore fail to remedy the existing inequalities and uncertainties in access to care, including for patients whose only realistic option is a new or experimental treatment.

Suggested question for the List of Issues

What measures will the State party take, including through legislative reform, to ensure that the legal framework on exceptional reimbursement of innovative medicines complies with articles 2, 12 and 15(1)(b) of the ICESCR?

5. Health and Health Services: Independent Oversight in Healthcare and Protection of Patients' Rights (arts. 2 and 12)

Access to quality and non-discriminatory healthcare is an essential component of the right to the highest attainable standard of health under Article 12 of the Covenant. The Public Defender of Rights has consistently raised concerns about the ongoing lack of an independent oversight mechanism to effectively monitor and enforce the protection of patients' rights in Slovakia's healthcare facilities.

The lack of an independent monitoring mechanism for patients' rights was underscored in a 2020 report¹⁴ of the Public Defender of Rights. The report highlighted systemic violations of

¹³ Public Defender of Rights, *Press release regarding the petition to the Constitutional Court challenging selected provisions of Act No. 363/2011 Coll. on the scope and conditions of reimbursement of medicines*, available here: <https://vop.gov.sk/obratil-som-sa-na-ustavny-sud-slovenskej-republiky-vo-veci-zakona-o-rozsahu-a-podmienkach-uhrady-liekov-pravna-uprava-postupu-zdravotnych-poistovni-pri-schvalovaní-uhrady-lieku-na-vynimku-je-lud/>

¹⁴ Public Defender of Rights, *Let's talk about childbirth: a human rights-based approach in the context of childbirth*, authored by Martina Thominet, Nora Konrády Beliová, and Michaela Polivčáková, Bratislava, 2022, p. 57 and 64, Available here: <https://vop.gov.sk/en/report/lets-talk-about-childbirth-a-human-rights-based-approach-in-the-context-of-childbirth/>

women's rights during facility-based childbirth, including inadequate respect for autonomy, informed consent, and privacy. The report also drew attention to concerns about the segregation and ill-treatment of Roma women in maternity wards.

The report pointed out the absence of effective mechanism for oversight over public and private health care facilities to guarantee respect for patients' rights to ensure redress for victims, including financial compensation, acknowledgement of wrongdoing, formal apology, and guarantees non-repetition. The Public Defender of Rights recommended either creating a new body or strengthening existing institutions. However, an essential component of this system must include clear and adequate competencies and resources.¹⁵

In the 2023 annual report, the Public Defender of Rights, reiterated the need to establish such an independent oversight mechanism, but his recommendations have not yet been adopted.

These concerns echo those raised by the UN Committee on Economic, Social and Cultural Rights in its 2019 concluding observations on Slovakia, where it noted serious violations of Roma women's rights in maternity care and the lack of effective remedies.¹⁶ Similar concerns were reiterated by the UN Committee on the Rights of the Child in 2025, which urged Slovakia to strengthen monitoring and prevention of segregation in paediatric and maternity care and to improve independent oversight mechanisms with adequate authority and resources.¹⁷

Suggested Question for the List of Issues

Please clarify which institution currently holds an independent mandate to monitor compliance with patients' rights in both public and private healthcare facilities in Slovakia, including rights arising under domestic legislation and international human rights obligations. Given the absence of a fully independent oversight mechanism, what steps does the State party intend to take to establish or strengthen a human rights institution or other independent body with the mandate, resources and legal powers to systematically monitor patients' rights, investigate alleged violations, issue binding recommendations or corrective measures, and ensure effective remedies for those affected?

6. Forced sterilisations of Roma women (arts. 2 and 12)

The Office of the Public Defender of Rights has been engaged with the issue of forced sterilisations of Roma women for more than two decades. A central element of this effort has been the repeated call for the creation of an effective, accessible and victim-centred compensation mechanism for all individuals sterilised in violation of the law.

¹⁵ In 2022, the Slovak National Centre for Human Rights analysed the mandates of institutions involved in protecting human rights in healthcare and concluded that Slovakia lacks an effective system to monitor and safeguard patients' rights. The findings confirmed the Public Defender of Rights' long-standing concerns and highlighted the need to establish an independent and impartial oversight body, such as a patients' ombudsman, or, alternatively, to strengthen existing institutions with clear competencies, adequate powers and sanctioning mechanisms to ensure effective enforcement. (Slovak National Centre for Human Rights, Options for Addressing Discrimination and Violations of Human Rights in Relation to the Provision of Health Care, 2022, Available at: <https://www.snslp.sk/vysledky/publikacna-cinnost/>)

¹⁶ Committee on Economic, Social and Cultural Rights, Concluding observations on the third periodic report of Slovakia, UN Doc. E/C.12/SVK/CO/3 (2019), paras. 44–45.

¹⁷ Committee on the Rights of the Child, Concluding observations on the sixth periodic report of Slovakia, CRC/C/SVK/CO/6, 31 January 2025, para. 33(a)).

In its 2019 concluding observations on Slovakia, the Committee expressed concern over forced sterilization of Roma women that has taken place, as well as the lack of effective remedies for victims of forced sterilisation. The Committee recommended Slovakia to ensure full, independent and transparent investigation into occurrences of forced sterilization of Roma women, and to provide proportionate, effective and timely remedies to all victims of forced sterilization, including compensation and guarantees of non-repetition.¹⁸

In its state report to the Committee, Slovakia indicated that several steps had been taken toward establishing a compensation mechanism for women who were subjected to forced sterilisation, including the preparation of a legislative intent by the Ministry of Justice and subsequent parliamentary proposals. However, none of these initiatives were ultimately adopted.¹⁹

The Public Defender of Rights participated in the preparation of the legislative intent, submitting comments and recommendations regarding the scope of the mechanism, evidentiary standards and the level of compensation. Despite this contribution, the Ministry of Justice did not follow up with a draft law, and previous parliamentary initiatives were also unsuccessful.

Although the Ministry of Justice announced in 2025 its intention to resume work on the draft legislation on one-time compensation for victims of unlawful sterilisation, no such proposal has been presented to date.

Suggested question for the List of Issues

Given the State party's repeated commitments since 2021 to establish a compensation mechanism for women sterilised in violation of the law, and the Ministry of Justice's announcement in 2025 that it would submit a draft law, yet without any draft being presented to date, what concrete steps and timelines does the State party foresee to ensure the adoption of an accessible, effective and victim-centred compensation mechanism, in accordance with the Committee's recommendations?

7. Right to Adequate Housing (art. 11)

The Public Defender of Rights submits this section to highlight systemic failures in the protection of the right to adequate housing in Slovakia, particularly affecting individuals living in marginalised Roma communities. Persistent structural barriers continue to prevent the full realisation of Article 11 ICESCR, largely due to the delegation of essential housing responsibilities to municipalities without adequate safeguards to ensure compliance.

Despite Slovakia having one of the highest home ownership rates in the European Union, the country faces profound and persistent disparities in access to adequate housing, particularly in marginalised Roma communities, where inadequate and substandard housing is widespread. Data indicate that 60 per cent of people living in marginalized Roma communities reside in inadequate housing, compared with 40 per cent of Roma living in integrated households and 7 per cent of the general population.²⁰

¹⁸ Committee on Economic, Social and Cultural Rights, Concluding observations on the third periodic report of Slovakia, UN Doc. E/C.12/SVK/CO/3 (2019), paras. 44 and 45(b)–(c)

¹⁹ State party's report, October 2024, paras 39 - 41

²⁰ Filip Markovič and Ľudmila Plachá, "Income and Living Conditions in Marginalized Roma Communities: Selected Indicators from the EU SILC_MRC 2020 Survey (Príjmy a životné podmienky v marginalizovaných rómskych komunitách: Vybrané ukazovatele zo zisťovania EU SILC_MRK 2020)," Office of the Plenipotentiary of the Slovak Government for Roma Communities, 2020, p. 75.

Inadequate housing includes dwellings lacking basic sanitation, access to running water, adequate lighting, or functional water installation, as well as informal, unsafe or structurally unsound dwellings. These deficiencies have long-term adverse effects on the health, dignity and safety of residents across Slovakia, and contribute to a sustained cycle of exclusion by hindering access to other rights, including education, work, participation in society and the highest attainable standard of health.

The absence of effective structural remedies capable of addressing municipal inaction

Slovakia's legislative framework assigns responsibility for addressing housing needs to municipalities. However, the central government has no effective mechanism to intervene when municipalities fail to act, resulting in a de facto transfer of responsibility to local authorities without ensuring that State obligations under the Covenant are met.

In its response to the 2019 CESCR concluding observations, the Slovak government explicitly stated that although the State creates instruments and legislative conditions for inclusive housing policies, the decision to use these instruments is entirely at the discretion of municipalities.²¹

This system effectively leaves the fulfilment of the right to housing dependent on the willingness of individual mayors. This situation is inconsistent with Article 2(1) ICESCR, which obliges the State party to ensure the realisation of Covenant rights throughout its territory.

In his 2025 report, the Council of Europe Commissioner for Human Rights highlighted that persistent local-level barriers remain a major obstacle to improving housing conditions for marginalised Roma communities, cautioning that decentralisation must not become an "excuse to avoid responsibility" and stressing that central authorities must intervene when municipalities fail to uphold human rights obligations.²²

The absence of effective state mechanism capable of ensuring compliance at the municipal level leaves the State without the tools necessary to fulfil its obligations under Article 11 ICESCR. While the Public Defender of Rights holds a constitutional mandate to independently assess such cases, yet it lacks the authority to compel municipalities to take corrective action. Other bodies, including the Office of the Government Plenipotentiary for Roma Communities, face even more limited competences and are unable to ensure municipal compliance.

Suggested Question for the List of Issues

In light of these concerns, the Public Defender of Rights invites the Committee to ask the State party to clarify how it ensures the realisation of the right to adequate housing for all individuals when municipalities fail to act, including by explaining what concrete mechanisms exist or are planned to guarantee this right in situations where municipalities do not address housing deprivation, refuse to use available state instruments, or maintain residents, including Roma and other people in housing need, in long-term substandard conditions?

²¹ State party's report, October 2024, para 200: „Regarding recommendations (b) and (c), the state creates instruments and legislative conditions for municipalities to develop inclusive local housing policies. However, the use of existing instruments is entirely up to individual municipalities. Areas that depend exclusively on municipal decision-making include, among others, addressing housing needs or accommodation, as well as deciding on the spatial plan and development of their own territory, this includes the location of new construction, including social rental housing.“

²² Council of Europe Commissioner for Human Rights, The Unheard 12 Million – Council of Europe Commissioner issues urgent wake-up call to act for Roma and Traveller rights, 1 October 2025, p. 68.