



# General Assembly

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**Human Rights Council**  
**Working Group on the Universal Periodic Review**  
**Forty-ninth session**  
Geneva, 28 April–9 May 2025

## **Summary of stakeholders' submissions on Spain\***

### **Report of the Office of the United Nations High Commissioner for Human Rights**

#### **I. Background**

1. The present report was prepared pursuant to Human Rights Council resolutions 5/1 and 16/21, taking into consideration the periodicity of the universal periodic review and the outcome of the previous review.<sup>1</sup> It is a summary of 47 stakeholders' submissions<sup>2</sup> for the universal periodic review, presented in a summarized manner owing to word-limit constraints. A separate section is provided for the contribution by the national human rights institution that is accredited in full compliance with the Paris Principles.

#### **II. Information provided by the national human rights institution accredited in full compliance with the Paris Principles**

2. The Ombudsman expressed concern about the lack of accessible housing; the persistence of structural racism and anti-Gypsyism; the exclusion of foreigners from administrative services and social programmes and barriers to healthcare; inefficient administrative procedures for the documentation of migrants and asylum applications; financial exclusion and consequent social marginalization; lack of transparency in judicial investigations into the use of force during deprivation of liberty; inadequate healthcare for persons deprived of their liberty; and a lack of coordination in the response to environmental emergencies.<sup>3</sup>

3. The Ombudsman recommended bringing the legal framework on torture into line with the Convention; adapting prison conditions to the mental health needs of persons deprived of liberty and developing the infrastructure necessary to assist persons in vulnerable situations; strengthening mechanisms for the identification and care of victims of trafficking; clarifying the circumstances of historic acts of terrorism by supporting projects to promote remembrance of these events and prevent their reoccurrence; developing a state system to ensure the minimum means of subsistence; developing more social housing; ensuring inclusive trade policies; increasing the number of healthcare professionals; strengthening protection against violence in schools; extending free early childhood education; developing a model to uphold the right to housing for the most vulnerable people; establishing a legal framework for large-scale environmental emergencies; implementing a legal framework for the reduction of pollutants; increasing resources for environmental remediation management;

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\* The present document is being issued without formal editing.



improving coordination among public agencies to assist women victims of violence; implementing protocols for childcare and ensuring comprehensive care for minors who are victims of violence and their families; improving disability assessment services; facilitating the registration of migrants in shelter facilities; training personnel and building infrastructure for the care of unaccompanied minors; and eliminating shortcomings in the operation of migrant holding centres.<sup>4</sup>

### **III. Information provided by other stakeholders**

#### **A. Scope of international obligations<sup>5</sup> and cooperation with human rights mechanisms**

4. Various stakeholders recommended ratifying the International Convention on the Protection of all Migrant Workers and Members of their Families.<sup>6</sup>

5. CGNK recommended ratifying the Convention on the Prevention and the Punishment of the Crime of Genocide.<sup>7</sup>

6. ICAN recommended ratifying the Treaty on the Prohibition of Nuclear Weapons.<sup>8</sup>

7. A number of organizations regretted that reports to treaty bodies were overdue; that Spain had not sufficiently implemented the recommendations of international human rights mechanisms, including from the UPR, and the lack of an adequate monitoring system.<sup>9</sup> They recommended establishing a normative procedure to ensure the implementation of the recommendations made by international human rights mechanisms; and accelerating the submission of pending reports to treaty bodies.<sup>10</sup>

8. PFT expressed concern about the postponing of Special Procedures' visits.<sup>11</sup> PL-LR recommended implementing the recommendations of the Special Rapporteur on Minority Issues.<sup>12</sup>

#### **B. National human rights framework**

##### **Constitutional and legislative framework**

9. JS25 recommended enacting a constitutional reform to ensure that economic, social, and cultural rights have the same degree of protection as civil and political rights, articulating the possibility of invoking these rights before the judges and courts of the corresponding jurisdiction.<sup>13</sup>

#### **C. Promotion and protection of human rights**

##### **1. Implementation of international human rights obligations, taking into account applicable international humanitarian law**

##### *Equality and non-discrimination*

10. JS21 expressed concern about structural discrimination, including barriers to access to employment, housing and healthcare, affecting vulnerable groups such as people with disabilities, migrants, refugees and people of African descent and the underreporting of such discrimination.<sup>14</sup> CEAR noted discrimination against migrants regarding access to housing.<sup>15</sup> IAPD expressed concern about the exclusion of migrant and refugee communities from consultations on the National Human Rights Plan.<sup>16</sup> JS21 recommended developing an accessible public system for reporting and remedying acts of discrimination and fostering the political and social participation of these groups.<sup>17</sup> The Human Rights Institute of Catalonia recommended adopting into law mandatory measures to prevent discrimination in the design and use of artificial intelligence based on a human rights approach.<sup>18</sup>

11. Some stakeholders acknowledged the adoption of Law 15/2022 on equal treatment and non-discrimination, and the inclusion in the law of “antigypsyism” as an aggravating factor in hate crimes. They recommended guaranteeing the application of this law and improving the protection of victims.<sup>19</sup>

12. Some organizations expressed concern over the escalating rise of hate crimes in recent years, particularly racially motivated and xenophobic crimes against members of minorities.<sup>20</sup> PTF and OSCE-ODIHR recommended intensifying efforts to combat hate speech and crimes, fully enforcing legislation against racism and discrimination and developing related educational programmes.<sup>21</sup> OSCE-ODIHR recommended condemning, investigating and punishing hate crimes effectively, enhancing mechanisms for hate crime data collection, adopting comprehensive policies through inter-agency cooperation to address hate crimes; and abstaining from any statement or action that exacerbates vulnerabilities.<sup>22</sup>

13. Many organizations regretted the persistence of discriminatory practices by the police, including the use of racial or ethnic profiling.<sup>23</sup> IDHC recommended legally prohibiting the use of identity checks based on ethnic and racial profiling, and ensuring its implementation.<sup>24</sup>

14. Some organizations welcomed the Second Action Plan to combat Hate Crimes (2022–2024) and the victim-support system.<sup>25</sup>

*Right to life, liberty and security of person, and freedom from torture*

15. IAPD acknowledged Spain’s efforts to promote a moratorium on the death penalty at international level.<sup>26</sup>

16. Some organisations expressed concern about the excessive use of force by law enforcement officers during demonstrations and at the lack of effective investigation on those cases.<sup>27</sup> They recommended investigating cases of police violence and abuse, including torture and ill-treatment; adopting the necessary institutional and regulatory reforms to end police brutality; and legally regulating the obligation of police officers to carry visible identification.<sup>28</sup>

17. JS4 recommended that Spain ensure that its law enforcement forces and officials comply with the United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials, including through human rights training.<sup>29</sup>

18. According to some organisations, Spain did not guarantee adequate investigations in cases of torture or ill-treatment by law enforcement officials, nor did it ensure that those involved were prosecuted or that victims were adequately compensated.<sup>30</sup> Some organizations recommended ensuring adequate investigations in cases of serious human rights violations; and establishing an independent mechanism to conduct investigations into allegations of torture and human rights violations committed by law enforcement officials.<sup>31</sup>

19. JS19 stressed the need to harmonize the crime of torture in the Penal Code with the Convention against Torture.<sup>32</sup>

20. JS19 expressed regret about the severity of prison sentences and the proportion of persons deprived of liberty serving sentences in closed or special facilities. It recommended increasing the use of open facilities.<sup>33</sup>

21. JS2 expressed concern about the continued use of incommunicado detention and recommended repealing article 509 of the Criminal Procedure Act to end this practice.<sup>34</sup>

22. JS19 and Caritas regretted the state of healthcare and mental health services in prisons.<sup>35</sup> Caritas recommended taking steps to ensure equity, quality and efficiency in the healthcare provided to persons deprived of their liberty.<sup>36</sup>

*Human rights and counter-terrorism*

23. Various organizations expressed concern over the alleged use of counter-terrorism legislation to criminalize political movements and protests in support of Catalonia’s independence and other dissenting voices.<sup>37</sup> They recommended not to use counter-terrorism laws to target activists and political opponents in the legitimate exercise of their rights to

freedom of expression, peaceful assembly, and association; and to revise the current counter-terrorism legislation to ensure that it cannot be used to restrict civil and political rights.<sup>38</sup>

*Administration of justice, including impunity, and the rule of law*

24. According to JS20 and OSCE-ODIHR, the Judiciary's independence was not sufficiently guaranteed. They expressed concerns at the process of appointment of members of the General Council of the Judiciary and regretted the lack of an independent monitoring mechanism. They recommended that Spain undertake a legal reform of the election system for judicial bodies and the appointment of judges; make the procedure transparent; ensure that the judiciary, not the legislature, select all the Council judges, and introduce efficient mechanisms that preserve the Judiciary's role and independence.<sup>39</sup>

25. Some organizations regretted Spain's lack of progress in the implementation of recommendations relating to the reparation for victims of the civil war and the dictatorship.<sup>40</sup> GCNK regretted the alleged proposals to abolish laws on historical reparation for enforced disappearances and killings in some regions.<sup>41</sup> JS2 was concerned that Law 09/1968 on Official Secrets could be a barrier to the right to the truth. It recommended repealing this law.<sup>42</sup> Several stakeholders recommended that Spain undertake the necessary legal reforms and establish the according protocols to ensure transitional justice according to international standards and provide reparations to victims of human rights violations committed during the dictatorship.<sup>43</sup>

26. JS12 recommended establishing a commission of independent experts and providing it with the means to compile a comprehensive report on the enforced disappearance of minors during the dictatorship.<sup>44</sup>

27. JS2 expressed regret at the absence of a judicial investigation into the Basque conflict and the lack of comprehensive reparations for its victims. It recommended implementing the recommendations made by the Committee against Torture in that regard.<sup>45</sup>

28. OMNIUM and JS3 expressed concern about the alleged inadequate application of and judicial barriers to implementing the 2024 Amnesty Law.<sup>46</sup> They recommended implementing the law without political interference or arbitrary interpretations and creating an international monitoring mechanism that oversees its implementation.<sup>47</sup>

*Fundamental freedoms and the right to participate in public and political life*

29. Many organizations expressed concerns about interferences to freedom of opinion and expression, prosecution and censorship of activists, artists, journalists, civil society organizations, including for alleged "glorification of terrorism", slandering of the Spanish Crown or flag, defamation. They recommended revising and amending legislation to align it with international standards; ensuring full respect for freedom of expression and of the press; establishing accountability mechanisms to monitor and assess the conduct of law enforcement officials, and refraining from persecuting elected representatives, activists and artists for expressing their opinions. They also recommended safeguarding the right to participate in public affairs, the freedoms of assembly and association and refraining from prosecuting activists when legitimately exercising their rights.<sup>48</sup> JS3 recommended establishing inclusive mechanisms to prevent politically motivated prosecutions.<sup>49</sup>

30. Several organizations expressed concern about the continued application of the Criminal Code against activists and the use of the Civil Security Act (Mordaza Act) to restrict freedom of expression.<sup>50</sup> Several contributions, including that of the Council of Europe, again recommended amending the Criminal Code and the Civil Security Act to bring them into line with European and international standards.<sup>51</sup>

31. Some stakeholders recommended implementing protections for journalists and holding extremist groups accountable for any threats made against them.<sup>52</sup>

32. Some organisations were concerned about alleged unlawful police infiltration in social and political movements.<sup>53</sup> JS20 recommended setting clear regulations to ensure that all surveillance activities comply with international human rights standards.<sup>54</sup>

33. OMNIUM regretted that in the Penal Code reform, sedition had been replaced by a new aggravated public disorder offense, broadening the range of behaviors considered criminal.<sup>55</sup> According to JS4, this reform could be used against organisations and social movements.<sup>56</sup>

34. OMNIUM noted the conditional and partial pardon of nine Catalan political and social leaders detained since 2017 but, in its opinion, conditions of non-recidivism could restrict their peaceful activism and limit their political rights.<sup>57</sup>

35. JS3 recommended that Spain continue its engagement with Catalan political and social to explore the root causes of the political conflict and find solutions to the claims of Catalan people.<sup>58</sup>

36. CIEMEN recommended expanding reciprocity agreements to grant local voting rights and increasing political participation for residents of other nationalities;<sup>59</sup> and carrying out inclusive related campaigns.<sup>60</sup> OSCE-ODIHR recommended providing educational material on electoral rights;<sup>61</sup> implementing mandatory training for poll workers; collecting gender-disaggregated data on electoral administration; and improving transparency of the electoral process.<sup>62</sup>

37. JS24 recommended that Spain align its legislation with international human rights standards on freedom of religion, and ensure in practice the rights of religious minorities without discrimination.<sup>63</sup>

#### *Right to privacy*

38. Several stakeholders expressed concern about the alleged use of illegal espionage tools against Catalan elected representatives, civil society leaders, activists, lawyers, journalists, and their relatives.<sup>64</sup> They recommended ending unlawful surveillance practices and speeding up independent and effective investigations of the use of spyware, and ensuring accountability, non-repetition, and reparation to victims.<sup>65</sup>

#### *Right to marriage and family life*

39. JS1 expressed concern about the barriers in the implementation of Organic Law 8/2021, particularly the alleged persistent application of the Parental Alienation Syndrome in criminal and civil jurisdictions, the lack of monitoring of guarantees in custody proceedings, and arbitrary separations. It recommended implementing comprehensive reparation measures for victims of the Parental Alienation Syndrome, developing guidelines for separations, introducing accountability mechanisms, investigation protocols, and appropriate sanctions.<sup>66</sup>

#### *Prohibition of all forms of slavery, including trafficking in persons*

40. ECLJ noted an increase in the number of victims trafficked for forced labour.<sup>67</sup> ECLJ and Caritas recommended strengthening efforts to combat trafficking in persons and adopting a comprehensive law on the protection for victims.<sup>68</sup>

41. JS8 recommended allocating specialised resources for victims of trafficking seeking international protection, including information on their rights and specialised psychological care.<sup>69</sup>

#### *Right to work and to just and favourable conditions of work*

42. JS14 and JS25 regretted the high levels of unemployment and overqualification of youth and that access to the market labor was particularly difficult for young migrants and those from vulnerable groups.<sup>70</sup> JS25 recommended increasing efforts towards full employment, with particular attention to overcoming gender and age gaps and discrimination affecting vulnerable groups.<sup>71</sup> JS21 recommended improving existing services and resources for the socio-labour inclusion of migrants, people with disabilities and people with mental health problems.<sup>72</sup>

43. JS26 recommended extending the leave for birth, foster care, adoption and guardianship for adoption purposes, equally remunerating parents on parental leave, and

ensuring that single-parent families enjoy the same length of leave as two-parent families.<sup>73</sup> JS25 recommended introducing measures to reach work-life balance.<sup>74</sup>

44. EUROMIL recommended that Spain ensure that its domestic legislation is in line with freedom of association and collective bargaining, as established in international law.<sup>75</sup>

#### *Right to social security*

45. Some organizations expressed concerns at the unequal access to social security programmes and that in some cases, municipalities put up barriers or deny the registration of migrants in an irregular situation. They recommended improving accessibility for all to social security benefits; guaranteeing and facilitating access to migrants' registry to access basic services for all people; recognising fundamental rights and ensuring access to basic benefits for all, regardless of their administrative status.<sup>76</sup>

46. Council of Europe noted the persisting inequalities in realizing social rights depending on place of residence.<sup>77</sup> CEAR was concerned about some administrative barriers that hinder access to public services for asylum-seeking children. It recommended ensuring their continuous access to education and guaranteeing universal access to the public health system regardless of the administrative situation.<sup>78</sup>

#### *Right to an adequate standard of living*

47. Many stakeholders were concerned at the large spectrum of the population living in poverty and major challenges faced to access basic services including electricity, for example, in the informal settlement of Cañada Real. They recommended addressing the high levels of poverty by improving access to services and benefits provided through public policies, setting compliance targets to reduce non-take-up. They also recommended restoring electricity in affected areas, including the Cañada Real settlement. Additionally, they called for tax system reforms to make it more progressive, transparent, and efficient, with specific measures to combat fraud, evasion, and avoidance, aiming to increase tax revenues and expand social spending.<sup>79</sup>

48. While welcoming the adoption of the Act on the right to housing, many organisations regretted the lack of social and affordable housing, the rise in housing prices and evictions. They recommended that Spain invest in additional resources to address inequalities in housing and living conditions; develop a strategic housing plan geared towards rental and rehabilitation sufficiently funded for social housing to meet the objectives of the Housing Act; progressively increase in the public housing stock to reach the European average of 9.3% in 2030; reform the eviction procedure established in the Civil Procedure Law in line with the recommendations of the Committee on Economic, Social and Cultural Rights; allocate resources for the eradication of homelessness; ensure enforcement of the Law on Housing with increased budget and sanctioning regime; ensure that domestic legislation is in line with the right to housing; and develop a plan to eradicate slum and substandard housing settlements.<sup>80</sup>

49. OSCE-ODIHR regretted the gaps in the standard of living of the Roma populations, including overcrowding, limited access to water, housing deprivation and discrimination when seeking accommodation.<sup>81</sup>

#### *Right to health*

50. JS7 expressed concern about the limited accessibility of and shortcomings in the public healthcare system, including in the Community of Madrid.<sup>82</sup> JS7 recommended ensuring that healthcare facilities provide access to medical care in accordance with the right to health, in line with the international commitments of Spain and in compliance with current legislation.<sup>83</sup> JS21 recommended establishing a comprehensive healthcare model.<sup>84</sup>

51. Council of Europe urged the authorities to strengthen universal access to quality public healthcare.<sup>85</sup> JS25 recommended approving the draft law to restore universal access to health benefits, with the necessary amendments to guarantee universal access to publicly funded healthcare.<sup>86</sup>

52. Caritas recommended ensuring effective and equal access to healthcare for all asylum-seekers in Spain,<sup>87</sup> and ensuring access to mental health services and programmes for those inside and outside the reception system.<sup>88</sup> It also recommended recognizing the right of access to healthcare for foreigners by facilitating their registration.<sup>89</sup>

53. Several contributions recommended guaranteeing access to specialised mental health care effectively, including by providing sufficient and adequate public mental health care resources, and prioritizing minors and pregnant women. They also recommended continuing efforts to ensure the implementation of the National Mental Health Strategy, particularly for children and adolescents.<sup>90</sup>

54. JS14 expressed concern about the use of addictive substances and narcotics in Spain, especially among young people.<sup>91</sup> JS14 recommended stepping up awareness-raising campaigns on the use of these substances, carrying out addiction prevention campaigns and stepping up measures to restrict the sale of and access to opioid pain relievers.<sup>92</sup>

55. Council of Europe welcomed important steps taken to uphold women's and girls' sexual and reproductive health and rights, urging Spain to address persistent regional inequalities to ensure equitable access nationwide.<sup>93</sup>

56. JS1 indicated that Organic Act No. 1/2023 on sexual and reproductive health and voluntary interruption of pregnancy had not been fully implemented, highlighting the higher barriers faced by migrant women in accessing abortion services. It recommended taking steps to ensure the Act's implementation and establishing mandatory training programmes on abortion for healthcare personnel.<sup>94</sup>

57. JS6 recommended to fully implement sexual education in schools, including training for teachers and the development of social advocacy strategies for families.<sup>95</sup>

#### *Right to education*

58. Many organizations expressed concern over the lower school performance of children from vulnerable groups and recommended adopting education policies focused on the groups most affected by school failure and dropout as well as launching campaigns to encourage school enrollment.<sup>96</sup> JS6 recommended introducing positive actions to ensure the enjoyment of the right to education by migrants and asylum seekers, including by providing academic support, and prioritizing their access to educational resources and services.<sup>97</sup> Stakeholders also recommended ensuring universal access to early public education, particularly for children at risk of poverty and social exclusion, including through specific measures targeted to these groups.<sup>98</sup>

59. JS25 recommended increasing public spending on education to reach the OECD average, considering territorial inequalities, and developing a State Plan against educational segregation.<sup>99</sup> Broken Chalk recommended increasing investment in infrastructure, focusing on rural areas, and developing scholarships, mentorships, and personalized learning plans to reduce dropout rates.<sup>100</sup> JS6 recommended ensuring educational inclusion, including by free access to extracurricular activities and summer programmes for vulnerable children.<sup>101</sup>

#### *Cultural Rights*

60. JS5 and JS6 was concerned at the insufficient use of Catalan in the justice system and public administrations, and regretted that in 2020, the High Court of Justice of Catalonia ruled against Catalan immersion in schools. They recommended that Spain ensure protection of the linguistic rights of minorities, particularly by implementing the recommendations of the Special Rapporteur on minority issues further to his visit to the country in 2019; and reviewing any measure that might reduce the proportion of teaching carried out in the Catalan minority language in public schools.<sup>102</sup>

61. Many stakeholders recommended protecting the regional languages, including Catalan, and recognizing their use in the respective autonomous communities, public administration and the judiciary, social and healthcare facilities, and public and socio-economic spheres. They also recommended that Spain amend Law 1/2000 for the use of co-official languages in courts.<sup>103</sup>

62. PL-LR recommended implementing the recommendations of the Committee of Experts of the European Charter of Regional or Minority Languages.<sup>104</sup>

*The environment, and business and human rights*

63. CGNK expressed concern over the lack of enforcement of environmental regulations which pose human and environmental risks and recommended that Spain uphold the rights set by the Aarhus Convention and other relevant regulations to protect life and to enforce environmental rights.<sup>105</sup>

64. The Human Rights Institute of Catalonia recommended ensuring that climate change adaptation and mitigation policies are developed and implemented according to an intersectional perspective and incorporate human mobility in their objectives, actions and indicators.<sup>106</sup>

65. JS18 indicated that Spain has not adequately fulfilled its human rights protection obligations in respect of businesses, including their extraterritorial activities, and recommended the transposition of the European Corporate Sustainability Due Diligence Directive into national law.<sup>107</sup>

66. JS25 recommended that Spain elaborate a second Business and Human Rights Plan containing measures in line with the recommendations of the Committee on Economic, Social and Cultural Rights.<sup>108</sup>

## **2. Rights of specific persons or groups**

*Women*

67. IAPD noted that political participation of women had increased and welcomed the measures taken to ensure free legal aid for women victims of violence and trafficking. However, it expressed concern over the rising violence against women.<sup>109</sup>

68. PFT was concerned at the widespread exposure of women, girls, and children to sexual and gender-based violence. It recommended reviewing the law on rape and sexual consent that had been adopted in 2022, which in its view may lead to impunity, and implementing robust measures to protect women and children from violence, including strengthening victim protection laws and ensuring access to justice.<sup>110</sup>

69. JS1 highlighted legislative developments regarding the elimination of gender-based violence and violence against children. However, it expressed regret about gaps in the regulations in that regard, the lack of implementation of those regulations and the insufficient application of gender and child-focused approaches by judges.<sup>111</sup> It recommended mandatory training on child sexual violence, gender and human rights for all relevant personnel.<sup>112</sup>

70. JS21 recommended incorporating an intersectional gender perspective into all public policies on social affairs.<sup>113</sup>

*Children*

71. The International Alliance for Peace and Development and Partners for Transparency expressed concern about high rates of violence against children.<sup>114</sup> JS10 recommended establishing a state protocol for the management of risk situations, protection gaps and child abuse.<sup>115</sup> JS26 and JS8 recommended improving the identification and protection of the most vulnerable children through a specialized mechanism of cooperation, particularly on children victims of trafficking.<sup>116</sup> JS26 further recommended creating a specialized Prosecutor's Office and Courts to investigate and prosecute crimes committed against children.<sup>117</sup>

72. PFT commended the adoption of the law to protect children and adolescents from violence.<sup>118</sup>

73. JS10 and JS26 recommended strengthening protections against violence against children and adolescents in digital environments.<sup>119</sup>



74. JS10 recommended re-establishing the position of Ombudsman for Children and providing the incumbent with the means to protect and promote children's rights.<sup>120</sup>

75. JS21 expressed concern about child poverty and stressed the need to increase resources and benefits for vulnerable families.<sup>121</sup> JS26 recommended increasing the resources allocated to eliminate child poverty.<sup>122</sup>

76. Many organizations expressed concern about the age determination process for migrant minors, which they argued were based on invasive medical tests, and recommended the adoption of a new procedure that is in the best interest of the child.<sup>123</sup> JS27 expressed concern about the lack of personnel specializing in interacting with children at arrival points and in documentation and review processes, resulting in the placement of minors in pretrial detention.<sup>124</sup>

77. JS21 and JS26 recommended improving the availability of resources for the protection, assistance, support and emancipation of children and adolescents of migrant origin, including in the foster care system.<sup>125</sup>

78. Caritas recommended changing the system by which the agency responsible for the guardianship of unaccompanied migrant children and adolescents is determined.<sup>126</sup> JS17 recommended establishing a protocol to evaluate the relationship between migrant minors and the adults accompanying them and to consider the option of guardianship when there is no biological or legal connection between them.<sup>127</sup>

79. JS26 recommended amending Organic Law 4/2025 to end the practice of summary deportations of migrant children.<sup>128</sup>

#### *Persons with disabilities*

80. JS21 noted that persons with disabilities did not enjoy equality in terms of mobility, accessibility, housing and resources for independent living. It indicated that, despite the progress represented by the abolition of legal incapacitation, many people with disabilities were seeing their access to certain provisions and benefits restricted and stressed the need to remedy the shortcomings in the aid and benefits system to uphold their rights. It also recommended implementing an independent living and community inclusion model for persons with disabilities and autism.<sup>129</sup>

81. JS1 noted significant disparities that could lead to situations of discrimination among women with disabilities or autism, including in terms of their sexual and reproductive rights.<sup>130</sup>

82. JS6 recommended revising and enforcing policies to guarantee the inclusion of students with disabilities in education.<sup>131</sup>

#### *Minorities*

83. Several organizations expressed concern over discrimination and hate speech against Catalans and reports of labour harassment for speaking Catalan.<sup>132</sup> According to JS22, the right to a fair trial and equality before the law for Catalan pro-independence representatives was not guaranteed.<sup>133</sup> Many stakeholders recommended prosecuting and sanctioning discrimination and hate speech against Catalans.<sup>134</sup>

84. OSCE-ODIHR expressed concern at the situation of Roma who remained unfamiliar with protection mechanisms, domestic standards, and procedures for filing complaints with National Human Rights Institutions and National Equality Bodies.<sup>135</sup> OSCE-ODIHR recommended ensuring effective implementation of a policy framework addressing Roma challenges, with clear monitoring, evaluation indicators, and dedicated budgets.<sup>136</sup> It also recommended paying tailored attention to ensure full and equal access to healthcare and reproductive rights for Roma women, children, youth, and elderly.<sup>137</sup> OSCE-ODIHR furthermore recommended raising awareness within the Roma community and civil society about justice and human rights protection mechanisms.<sup>138</sup>

85. JS26 and JS6 recommended adopting a specific support plan against school failure and school segregation against Roma students and improving access to post-compulsory education.<sup>139</sup>

*Lesbian, gay, bisexual, transgender and intersex persons*

86. Arcópoli welcomed the adoption of the Trans Act. However, it noted that the Act's implementation had been limited, especially for migrants and non-binary people.<sup>140</sup> In addition, it expressed regret about the lack of institutional awareness and barriers to access to basic services such as healthcare and employment for the LGTBQI+ population.<sup>141</sup> It recommended effectively implementing the legislation in force; promoting inclusive labour policies; improving the analysis of data on discrimination and violence against LGTBQI+ people; and strengthening training for law enforcement, judicial and health personnel on the rights of LGTBQI+ people.<sup>142</sup>

87. Arcópoli highlighted the protocol and educational programmes and materials promoting respect for sexual and gender diversity and recommended integrating diversity content at all educational levels.<sup>143</sup>

*Migrants, refugees and asylum-seekers*

88. Several organisations expressed concern about summary returns, collective expulsions and forced repatriations at Spain's borders, especially in Ceuta and Melilla.<sup>144</sup> PTF observed that refugees and asylum seekers were exposed to significant risks of deportation or refoulement to countries where they faced risks of persecution, torture, and other serious human rights violations.<sup>145</sup> Several organisations recommended taking the necessary measures to safeguard the principle of non-refoulement and to refrain from collective returns.<sup>146</sup>

89. The Council of Europe deplored the significant disparities in access to protection for refugees, asylum seekers, and migrants across Spain and highlighted the challenges faced at the border between Nador, Morocco, and Melilla. It urged authorities to ensure effective access to asylum by establishing comprehensive measures that provide legal and safe entry for those in need of protection.<sup>147</sup>

90. Several organizations expressed concern about obstacles to accessing the international reception and protection system, such as the impossibility of obtaining an appointment to submit an asylum application and the inaccessibility of the system from abroad.<sup>148</sup> JS13 recommended facilitating asylum application procedures.<sup>149</sup> JS8 recommended ensuring access to the international protection procedure without distinction as to nationality and ensuring respect for due process guarantees.<sup>150</sup> The Spanish Commission for Assistance to Refugees and JS8 recommended developing a system of secure legal channels to ensure access to international protection from abroad.<sup>151</sup> JS8 recommended ensuring that persons in an irregular situation are able to file complaints without this resulting in their deportation.<sup>152</sup>

91. The Spanish Commission for Assistance to Refugees pointed to the travel visa requirement as a limitation to access to the right to asylum, recommending the elimination of this requirement for persons in need of international protection arriving by air.<sup>153</sup> JS27 was concerned about migrants who entered the territory through irregular channels, who had been systematically deprived of their liberty in migrant holding facilities, where interrogations of newly arrived persons without legal assistance had been reported.<sup>154</sup>

92. Several stakeholders denounced inadequacies in the delivery of critical services and situations of violence, aggression, and human rights violations in Foreigners' Internment Centers.<sup>155</sup>

93. JS8 and JS23 recommended enforcing the current legislation to hold accountable those responsible for abuses committed in the facilities and limiting detention to exceptional cases.<sup>156</sup> IAPD recommended establishing additional reception centers to ease overcrowding and enforcing accountability measures for staff involved in violent acts.<sup>157</sup>

94. JS23 and JS8 expressed concern by the lack of adequate healthcare delivery in facilities and recommended providing comprehensive healthcare services.<sup>158</sup>

95. JS13 recommended providing asylum-seekers with the documents they need to exercise their fundamental rights while their appeal for reconsideration of the rejection of their application was being processed.<sup>159</sup>

96. S23 and JS8 reported that the Immigration Department continued to obstruct civil society organizations from visiting immigrant detention centers.<sup>160</sup>

#### *Stateless persons*

97. JS16 pointed out some shortcomings in the statelessness determination procedure in Spain, in particular the fact that the current regulations were not tailored to the specific needs of minors. It stated that developing a procedure tailored to the needs of children was imperative.<sup>161</sup> JS16 recommended allowing fast-track naturalization for stateless persons and amending legislation to grant nationality rather than stateless status to minors and eliminating barriers to that process, in accordance with the obligations of Spain under the Convention relating to the Status of Stateless Persons.<sup>162</sup>

#### *Notes*

<sup>1</sup> A/HRC/44/7 and A/HRC/44/7/Add.1, and A/HRC/44/2.

<sup>2</sup> The stakeholders listed below have contributed information for this summary; the full texts of all original submissions are available at: [www.ohchr.org](http://www.ohchr.org) (one asterisk denotes a national human rights institution with A status).

#### *Civil society*

##### *Individual submissions:*

|                              |                                                                                                                    |
|------------------------------|--------------------------------------------------------------------------------------------------------------------|
| ADF International            | ADF International, Geneva (Switzerland);                                                                           |
| AMESANL                      | A Mesa pola Normalización Lingüística, Santiago de Compostela (Spain);                                             |
| Arcópoli                     | Arcópoli, Madrid, (Spain);                                                                                         |
| Asociación Amigas de la RASD | Asociación Amigos y Amigas de la República Árabe Saharaui Democrática (RASD) de Álava, Vitoria-Gasteiz (Spain);    |
| Broken Chalk                 | The Stichting Broken Chalk, Amsterdam (Netherlands);                                                               |
| Caritas                      | Caritas Española, Madrid (Spain);                                                                                  |
| CEAR                         | Comisión Española de Ayuda al Refugiado, Madrid (Spain);                                                           |
| CGNK                         | Center for Global Nonkilling, Grand-Saconnex (Switzerland);                                                        |
| CIEMEN                       | Centre Internacional Escarré per a les Minories Ètniques i Nacionals, Barcelona (Spain);                           |
| EAJW                         | European Association Of Jehovah's Witnesses, Kraainem (Belgium);                                                   |
| ECLJ                         | The European Centre for Law and Justice, Strasbourg (France);                                                      |
| IAPD                         | International Alliance for Peace and Development, Geneva (Switzerland);                                            |
| ICAN                         | International Campaign to Abolish Nuclear Weapons Geneva (Switzerland);                                            |
| IDHC                         | Human Rights Institute of Catalonia, Barcelona (Spain);                                                            |
| OMNIUM                       | Òmnium Cultural, Barcelona (Spain);                                                                                |
| OSCE-ODIHR                   | Organization for Security and Co-operation in Europe-Office for Democratic Institutions and Human Rights (Poland); |
| TTP                          | Partners for Transparency, Cairo (Egypt);                                                                          |
| PL-LR                        | Plataforma per la Llengua, Barcelona (Spain).                                                                      |

##### *Joint submissions:*

|     |                                                                                                                                                      |
|-----|------------------------------------------------------------------------------------------------------------------------------------------------------|
| JS1 | <b>Joint submission 1 submitted by:</b> Advocates for Human Rights, Women's Link Worldwide, Minneapolis, (United States of America);                 |
| JS2 | <b>Joint submission 2 submitted by:</b> Egiari Zor Fundazioa and Observatorio Vasco de Derechos Humanos – Behatokia. Donostia-San Sebastian (Spain); |
| JS3 | <b>Joint submission 3 submitted by:</b> Amnistia i Llibertat and Sine Qua Non. Barcelona, (Spain).                                                   |
| JS4 | <b>Joint submission 4 submitted by:</b> No somos Delito y Defender a quien Defiend Barcelona, (Spain);                                               |
| JS5 | <b>Joint submission 5 submitted by:</b> La Intersindical, Language Rights, USTEC·STES-IAC, Sine Qua Non and Plataforma per                           |

- la Llengua. Geneva (Switzerland);
- JS6 **Joint submission 6 submitted by:** Catesco and the Platform for Childhood in Catalonia (PINCat). Barcelona (Spain);
- JS7 **Joint submission 7 submitted by:** CETIM, Vecinas y Vecinos por la Sanidad Pública and Asamblea Popular de Carabanchel. Geneva (Switzerland);
- JS8 **Joint submission 8 submitted by:** CONVIVE – Fundación Cepaim and Red Acoge. Madrid (Spain);
- JS9 **Joint submission 9 submitted by:** European Language Equality Network (ELEN), Euskalgintzaren Kontseilua, Òmnium Cultural, Plataforma per la Llengua, A Mesa pola Normalización Lingüística, Obra Cultural Balear, Acció Cultural del País Valencià and Iniciativa pola Asturianu. Brussels (Belgium);
- JS10 **Joint submission 10 submitted by:** Fundación Marista de Solidaridad Internacional (FMSI), Solidaridad, Educación y Desarrollo (SED), Fundación Marcelino Champagnat, Fundació Champagnat, Asociación Espiral Loranca, Fundación Juan Bautista Montagne. Rome (Italy);
- JS11 **Joint submission 11 submitted by:** Free Press Unlimited and the International Press Institute (IPI). Amsterdam (Netherlands);
- JS12 **Joint submission 12 submitted by:** Fundació Josep Irla and Observatorio de las Desapariciones Forzadas de Menores (ODFM). Barcelona (Spain);
- JS13 **Joint submission 13 submitted by:** Associació Human Rights Cat and Fundació Ficat. Barcelona (Spain);
- JS14 **Joint submission 14 submitted by:** Istituto Internazionale Maria Ausiliatrice (IIMA) and International Volunteerism Organization for Women Education Development (VIDES International). Veyrier (Switzerland);
- JS15 **Joint submission 15 submitted by:** Irídia – Centro por la Defensa de los Derechos Humanos, Instituto Novact de Noviolencia, Gentium, OMCT, Suds. Barcelona (Spain);
- JS16 **Joint submission 16 submitted by:** European Network on Statelessness, Institute on Statelessness and Inclusion, ACCEM, Convive-Fundación Cepaim and Red Acoge. Eindhoven (Netherlands);
- JS17 **Joint submission 17 submitted by:** Fundación Profesor Uría, Universidad de Sevilla, Fundación Emet Arcoiris. Córdoba (Spain);
- JS18 **Joint submission 18 submitted by:** Oxfam Intermón, Alianza por la Solidaridad – Action Aid, Centro de Políticas Públicas y Derechos Humanos-Perú EQUIDAD, CooperAcción. Barcelona (Spain);
- JS19 **Joint submission 19 submitted by:** Organización Mundial contra la Tortura (OMCT), Irídia – Centro para la Defensa de los Derechos Humanos, Asociación Andaluza Pro-Derechos Humanos, Centro Sira - Atención a Víctimas de Malos Tratos y Tortura, Comisión Legal Sol, ASDEPRES, Salhaketa, Observatori del Sistema Penal i els Drets Humans, Centro de Documentación y Denuncia de la Tortura (CDDT) and Rights International Spain. Madrid (Spain);
- JS20 **Joint submission 20 submitted by:** Sine Qua Non, Amnistia i Llibertat, Associació Catalana de Professionals (ACP), Centre Internacional Escarré per les Minories Ètniques i Nacionals (Ciemen), Fundació Catalunya Fons, Fundació Josep Irla, Grup de Periodistes Ramon Barnils, Language Rights, Nativitat Yarza, Plataforma per la Llengua, Quorum. Geneva (Switzerland);
- JS21 **Joint submission 21 submitted by:** Taula d'Entitats del Tercer Sector Social de Catalunya, Entitats Catalanes d'Acció Social (ECAS), Confederació ECOM, Federació

- d'Associacions de Gent Gran de Catalunya (FATEC), Federació Catalana d'Autisme (FCA), Federació Catalana de Drogodependències (FCD), Federació Catalana de Voluntariat Social (FCVS), Federació d'Entitats d'Atenció a la Infància i l'Adolescència (FEDAIA), Federació d'Entitats amb Projectes i Pisos Assistits (FEPA), Federació Salut Mental Catalunya (FSMC), Discapacitat Intel·lectual Catalunya (DINCAT) i Orde Hospitalari Sant Joan de Déu. Barcelona (Spain);
- JS22 **Joint submission 22 submitted by:** Unrepresented Nations and Peoples Organization (UNPO) and Assemblée Nacional de Catalunya. Brussels (Belgium);
- JS23 **Joint submission 23 submitted by:** VIVAT International, the Company of the Daughters of Charity of St. Vincent de Paul and VIVAT International España. Geneva (Switzerland);
- JS24 **Joint submission 24 submitted by:** World Evangelical Alliance (WEA), European Evangelical Alliance (EEA) and Alianza Evangelica Española (AEE). Geneva (Switzerland);
- JS25 **Joint submission 25 submitted by:** Plataforma de Derechos Económicos, Sociales y Culturales - España. Madrid (Spain);
- JS26 **Joint submission 26 submitted by:** Plataforma de Organizaciones de Infancia Spain. Madrid (Spain);
- JS27 **Joint submission 27 submitted by:** Novact, Iridia, No Name Kitchen, Solidary Wheels, Servicio Jesuita de Migraciones, FUNDEC, Centro SiRa Barcelona, (Spain).
- National human rights institution:*  
SPU Defensor del Pueblo de España (Spain).
- Regional intergovernmental organization(s):*  
CoE The Council of Europe, Strasbourg (France).
- <sup>3</sup> See Defensor del Pueblo, page 1–8.
- <sup>4</sup> See Defensor del Pueblo, page 1–8.
- <sup>5</sup> The following abbreviations are used in UPR documents:
- |            |                                                                                                               |
|------------|---------------------------------------------------------------------------------------------------------------|
| ICERD      | International Convention on the Elimination of All Forms of Racial Discrimination                             |
| ICESCR     | International Covenant on Economic, Social and Cultural Rights                                                |
| OP-ICESCR  | Optional Protocol to ICESCR                                                                                   |
| ICCPR      | International Covenant on Civil and Political Rights                                                          |
| ICCPR-OP 1 | Optional Protocol to ICCPR                                                                                    |
| ICCPR-OP 2 | Second Optional Protocol to ICCPR, aiming at the abolition of the death penalty                               |
| CEDAW      | Convention on the Elimination of All Forms of Discrimination against Women                                    |
| OP-CEDAW   | Optional Protocol to CEDAW                                                                                    |
| TSF        | Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment                      |
| OP-CAT     | Optional Protocol to CAT                                                                                      |
| RCC        | Convention on the Rights of the Child                                                                         |
| OP-CRC-AC  | Optional Protocol to CRC on the involvement of children in armed conflict                                     |
| OP-CRC-SC  | Optional Protocol to CRC on the sale of children, child prostitution and child pornography                    |
| OP-CRC-IC  | Optional Protocol to CRC on a communications procedure                                                        |
| ICRMW      | International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families |
| CRPD       | Convention on the Rights of Persons with Disabilities                                                         |
| OP-CRPD    | Optional Protocol to CRPD                                                                                     |
| ICPPED     | International Convention for the Protection of All Persons from Enforced Disappearance                        |
- <sup>6</sup> See PFT, page 6. See IAPD page 5. See Cáritas, page 2. See JS8, page 2, paras. 1–5. See JS10, page 11, para.37. JS16, page 12, para. 48.
- <sup>7</sup> CGNK, page 2.
- <sup>8</sup> See ICAN, page 1.

- <sup>9</sup> See JS25, page 3, para. 13. See JS26, page 16, paras. 111 and 112; See PFT, page 2. See IAPD page 0. See JS25, page 3, para. 13. See Cáritas, page 1; See Cáritas, page 1–2. See JS26, page 16, paras. 110–112. See JS25, page 3, paras. 9 and 13. See JS19, page 9, paras. 31 and 33; See PFT, page 1.
- <sup>10</sup> See JS25, page 3, para. 8. See JS19, page 11, para. 15. See Caritas, page 7, paras. 11 and 12. See JS26, page 16, paras. 113 and 114; See IAPD page 5.
- <sup>11</sup> See PFT, page 2.
- <sup>12</sup> See PL-LR, para. 22 (d).
- <sup>13</sup> See JS25, page 2, para. 8.
- <sup>14</sup> See JS21, page 2, para. 3.
- <sup>15</sup> See CEAR, para 5.
- <sup>16</sup> See IAPD page 1 (2).
- <sup>17</sup> See JS21, page 11, para 38–39.
- <sup>18</sup> See IDHC, page 9.
- <sup>19</sup> See CEAR, para. 3 and 33. See JS8, page 5, para. 20; See OSCE-ODIHR, para. 15.
- <sup>20</sup> See PFT, page 3, 4 and 7; See EAJW para. 16; See IAPD page 2.
- <sup>21</sup> See PFT, page 3, 4 and 7.
- <sup>22</sup> See OSCE-ODIHR, para. 11.
- <sup>23</sup> See JS25, page 4, paras. 15–20. See IDHC, page 8. See JS8, page 4 and 5, paras. 11–20. See JS19, page 6, paras. 23 and 24.
- <sup>24</sup> See IDHC, page. 9.
- <sup>25</sup> See CEAR, paras. 3 and 33; See OSCE-ODIHR, paras. 7 and 8. See PTF page 4.
- <sup>26</sup> See IAPD, page 1.
- <sup>27</sup> See JS4 page 11. See JS22, pages 7 and 8. See CGNK, page 4.
- <sup>28</sup> See JS4 page 13 (f); See JS22, page 12; See JS2, pages 4, 7 and 13; See CGNK, page 4.
- <sup>29</sup> JS4, p.14.
- <sup>30</sup> See JS2, pages 4, 7 and 13; JS4, page 14 (i). See JS9, page 10, para. 2.
- <sup>31</sup> See JS2, pages 4, 7 and 13; JS4, page 14 (i). See JS9, page 10, para. 2. See IAPD, page 2.
- <sup>32</sup> See JS19, page 9, para. 1.
- <sup>33</sup> See JS19, pages 6 and 10, para. 25, 26 and 13.
- <sup>34</sup> See JS2, page 13.
- <sup>35</sup> See JS19, pages 6 and 7.
- <sup>36</sup> See Caritas, page 10, para. 32, JS19 p.10.
- <sup>37</sup> See OMNIUM paras. 17 and 20. See JS4 page 9. See JS22, pages 6–8. See JS20, pages 11, 16 and 17. See JS11, page 4, para. 2.5.
- <sup>38</sup> See OMNIUM paras. 17, 20 and 40(3). See JS4 page 9; See JS22, page 12. See JS20, page 11 and 17. See JS11, page 6, para. 3.3.
- <sup>39</sup> See JS20, pages 13–15; See OSCE-ODIHR, para. 4.
- <sup>40</sup> See JS12, pages 2–14. See JS19, pages 7 and 8, paras. 28–30. See also See CGNK, page 4.
- <sup>41</sup> See CGNK, page 4.
- <sup>42</sup> See JS2, pages 9 and 13.
- <sup>43</sup> See JS12, pages 15–18. See JS19, page 10, para. 10. See OMNIUM para. 40(4). See also See CGNK, page 4.
- <sup>44</sup> JS12, p. 16.
- <sup>45</sup> See JS2, pages 5, 4, 6, 8 and 13.
- <sup>46</sup> See OMNIUM para 10–15 and 40 (1). See JS3 pages 12 and 13.
- <sup>47</sup> See OMNIUM para 10–15 and 40 (1). See JS3 pages 12 and 13.
- <sup>48</sup> See JS3 pages 5, 6 and 13; See JS22, page 6–8, 11; See JS22 11–12, See JS20, page 7–11, 14, 18 and 19 and 18. See JS11, pages. 2–5, para. 1.1–2.12, 6, para. 3.7; See JS11, pages 5 and 6, para. 3.3–3.6; See Caritas, page 9, para. 20.
- <sup>49</sup> JS3, p. 5 and 6.
- <sup>50</sup> See JS4 page 2, 9, and 10. See IAPD page 1 and 2. See JS20, pages 7–10. See JS11, pages 3 and 4, para. 2.2 and 2.4.
- <sup>51</sup> See JS4 page 14 (d). See JS20, page 10. See JS11, page 5, paras. 3.1 and 3.6 See IAPD pages 1 and 5; See Council of Europe, page 3.
- <sup>52</sup> See IAPD page 1 and 5. See JS4 page 13 (e and f).
- <sup>53</sup> See Omnium, pages 8–9, paras. 35 and 36. See JS4 pages 10 and 11 (a, b, c and d). See JS20, page 16.
- <sup>54</sup> See JS20, page 16.
- <sup>55</sup> See OMNIUM paras. 8 and 9.
- <sup>56</sup> See JS4, page 9.
- <sup>57</sup> See OMNIUM para. 7.
- <sup>58</sup> JS3, p. 13.
- <sup>59</sup> See CIEMEN, paras. 6, 9–11.

- <sup>60</sup> See CIEMEN, page 7, paras. 13 and 14 and page 8, paras. 16 and 18.
- <sup>61</sup> See OSCE-ODIHR, para. 6.
- <sup>62</sup> See OSCE-ODIHR, para. 6.
- <sup>63</sup> See JS24 page 3, para. 13a and 13b. See also EAJW, p. 8.
- <sup>64</sup> See JS22, page 5. See JS20, page 15. See JS11, page 3, para. 1.6. See Omnium, page 7, para. 28–29; JS15, page 7–8.
- <sup>65</sup> See Omnium, page 10, para. 40 (2); See JS22, page 13. See JS20, page 15.
- <sup>66</sup> See JS1, para 7. 12. 18. 23. 27.28.31–37.51.
- <sup>67</sup> See ECLJ, page 6.
- <sup>68</sup> See ECLJ, page 6; See Caritas, page 8, para. 19, See Caritas, page 8, para. 19.
- <sup>69</sup> See JS8, page 8, para. 32.
- <sup>70</sup> See JS14, page 9, para. 33–36; See JS25, page 9, para. 53.
- <sup>71</sup> See JS25, page 9, para.53.
- <sup>72</sup> See JS21, page 12, para. 48.
- <sup>73</sup> See JS26, page 4, paras. 14–16.
- <sup>74</sup> See JS25, page 9, para. 53.
- <sup>75</sup> EUROMIL, page 3.
- <sup>76</sup> See JS21, page 11, para. 37; JS8, page 6, para. 24; See JS25, page 5, para. 28; JS27, page 10.
- <sup>77</sup> See Council of Europe, page 3.
- <sup>78</sup> See CEAR, paras. 10, 11, 30 and 31.
- <sup>79</sup> See JS25, page 7, para. 41. See Caritas, page 9, para. 21–23. See JS21, page 12, para. 53. See JS26, page 4, para. 13; See IAPD page 5. See OSCE-ODIHR, para. 17; See PFT, pages 4 and 5. See PFT, pages 4 and 5.
- <sup>80</sup> See JS25, page 7, para. 41. See Caritas, page 9, para. 21–23. See JS21, page 12, para. 53. See JS26, page 4, para. 13; See IAPD page 5. See OSCE-ODIHR, para. 17; See PFT, pages 4 and 5.
- <sup>81</sup> See OSCE-ODIHR, para. 17.
- <sup>82</sup> See JS7, pages 4 and 5.
- <sup>83</sup> See JS7, page 5, para. 24 & 26.
- <sup>84</sup> See JS21, page 12, para. 50.
- <sup>85</sup> See Council of Europe, page 3.
- <sup>86</sup> See JS25, page 6, para. 33.
- <sup>87</sup> See Caritas, page 10, para. 28.
- <sup>88</sup> See Caritas, page 10, para. 30.
- <sup>89</sup> See Caritas, page 10, para. 33.
- <sup>90</sup> See Caritas, page 10, para. 29; JS14, page 8, para.42. See JS26, page 6, para. 32; JS10, page 13, para. 46. See JS21, page 12, para. 51.
- <sup>91</sup> See JS14, pages 7 and 8, para. 23–27.
- <sup>92</sup> See JS14, page 8, para. 32.
- <sup>93</sup> See Council of Europe, page 3.
- <sup>94</sup> See JS1, paras. 39.42.42, 47 and 51.
- <sup>95</sup> See JS6, page 23, paras. 90–92.
- <sup>96</sup> See JS25, page 8, para. 48. See JS26, page 6, para. 25. See JS6, page 9, paras. 32–37. See JS14, pages. 3 and 4, IAPD p.4.
- <sup>97</sup> See JS6, pages 14 and 15, paras. 58–65.
- <sup>98</sup> See JS26, page 6, para. 27. See JS6, page 4, para. 10–13; See JS25, page 8, para. 48. See JS21, page 11, para. 41. See JS6, pages 3 and 4.
- <sup>99</sup> See JS25, page 8, para. 48.
- <sup>100</sup> See Broken-Chalk, paras 33–44.
- <sup>101</sup> See JS26, page 6, para. 26. d, page 7, paras. 21–26; and page 25, paras. 99–101.
- <sup>102</sup> JS5, pages 4–7 and 10. See JS5. pages 9 and 10. See JS6, page. 21, para. 85.
- <sup>103</sup> See PL-LR, para. 22 (a-f). See JS22, pages 10 and 11. See JS5, pages 9 and 10; See JS9, page 13; AMESANL, paras. 7,8,9,10, 12, 18, 26, 35 and 46 (g–b).
- <sup>104</sup> See PL-LR, para. 22(d).
- <sup>105</sup> See CGNK, page 5.
- <sup>106</sup> See IDHC, page 9,
- <sup>107</sup> See JS18, pages 3 and 10.
- <sup>108</sup> See JS25, page. 10, para. 59.
- <sup>109</sup> See IAPD page 4.
- <sup>110</sup> See PFT, pages 5, 6 and 7.
- <sup>111</sup> See JS1, paras. 4.5.7.
- <sup>112</sup> See JS1, para. 51.
- <sup>113</sup> See JS21, pages 3 and 11, paras. 6 and 40.
- <sup>114</sup> See IAPD pages 4 and 5. See PFT, page 7.

- <sup>115</sup> See JS10, page 6, para. 23.
- <sup>116</sup> See JS26, page 11, para. 68 and 70. See JS8, page 13, para. 56.
- <sup>117</sup> See JS26, page 13, para. 86.
- <sup>118</sup> See PFT, page 7.
- <sup>119</sup> See JS10, page 9, para.31. JS26, page 12, para. 81.
- <sup>120</sup> See JS10, page 6, para. 23.
- <sup>121</sup> See JS21, page 4, para. 9.
- <sup>122</sup> See JS26, page 4, para. 11.
- <sup>123</sup> See JS13, pages 2–7. See JS10, page 11, para. 36. See JS26, page 8, paras. 46 and 47. See JS8, page 14, paras. 57 and 58. See CEAR, para. 13. See JS27 page 4; See JS13, page 9, para. 68. See Caritas, page 8, para. 18. See JS10, page 11, para. 37. See JS26, page 8, para. 48. See JS8, page 14, para. 59. See CEAR, para. 25.
- <sup>124</sup> See JS27 page 3.
- <sup>125</sup> See JS21, page 11, para. 42. See JS26, page 15, paras. 103 & 109.
- <sup>126</sup> See Caritas, page 7, para. 17.
- <sup>127</sup> See JS17, page 11, para. 54.
- <sup>128</sup> See JS26, page 9, para. 53.
- <sup>129</sup> See JS21, page 5,11, para. 11 and 15.
- <sup>130</sup> See JS21, page 3.
- <sup>131</sup> See JS6, page 12, para. 46.
- <sup>132</sup> See PL-LR, paras. 4, 8, 17 and 19. See JS22, pages 10 and 11. See JS5, pages 9 and10; AMESANL, paras. 7, 8, 9, 10, 12, 18, 26 and 35.
- <sup>133</sup> See JS22, page 4.
- <sup>134</sup> See PL-LR, para. 22 (a–f). See JS22, pages 10 and11. See JS5, pages 9 and10; See JS9, page 13; AMESANL, paras. 7, 8, 9, 10, 12, 18, 26, 35 and 46 (g–b).
- <sup>135</sup> See ODIHR, para. 15.
- <sup>136</sup> See OSCE-ODIHR, page 7.
- <sup>137</sup> See OSCE-ODIHR, page 7.
- <sup>138</sup> See OSCE-ODIHR, page 7.
- <sup>139</sup> See JS6, page 12, and JS26, page 9.
- <sup>140</sup> See Arcópoli, page 5, 8 and 15.
- <sup>141</sup> See Arcópoli, page 10, 11, 12 and 13.
- <sup>142</sup> See Arcópoli, page 16.
- <sup>143</sup> See Arcópoli, pages 9 and 16.
- <sup>144</sup> See CEAR, paras 6 and 8. See JS27 page 5. See JS8, page 12, paras. 50 and 51. See also See Council of Europe, page 3, and See PFT, pages 2 and 7.
- <sup>145</sup> See PFT, pages 2 and 7.
- <sup>146</sup> See CEAR, paras. 17 and 27. See IAPD page 5. See JS8, page 12, para. 53. See also See Council of Europe, page 3, and See PFT, pages 2 and 7.
- <sup>147</sup> See Council of Europe, page 3.
- <sup>148</sup> See JS13, pages 7 and 8. See JS8, pages 9–11. See CEAR, page 5, paras. 14–15. See JS27, pages 6–8.
- <sup>149</sup> See JS13, page 9, para. 68.
- <sup>150</sup> See JS8, pages 10–11, paras. 44–49.
- <sup>151</sup> See JS8, pages 10–11, paras. 44–49. See CEAR, para 22.
- <sup>152</sup> See JS8, page 3, para. 10.
- <sup>153</sup> See CEAR, para 17 and 27.
- <sup>154</sup> See JS27 page 9.
- <sup>155</sup> See JS23, page 4, paras. 15 and 17. See JS8, page 7, para. 29. See CEAR, para 16. See IAPD pages 3,4 and 6. See JS27 page 4.
- <sup>156</sup> See JS23, page 7, para. 34. See JS8, page 7, para. 32.
- <sup>157</sup> See IAPD page 3,4 and 6.
- <sup>158</sup> See JS23, pages 5–7. See JS8, page 7, para. 32.
- <sup>159</sup> See JS13, pages 9, para. 68.
- <sup>160</sup> See JS23, page 4, para 16. See JS8, page 7, para. 29.
- <sup>161</sup> See JS16, page 11, para 48 (ii).
- <sup>162</sup> See JS16, page 11 and JS17.