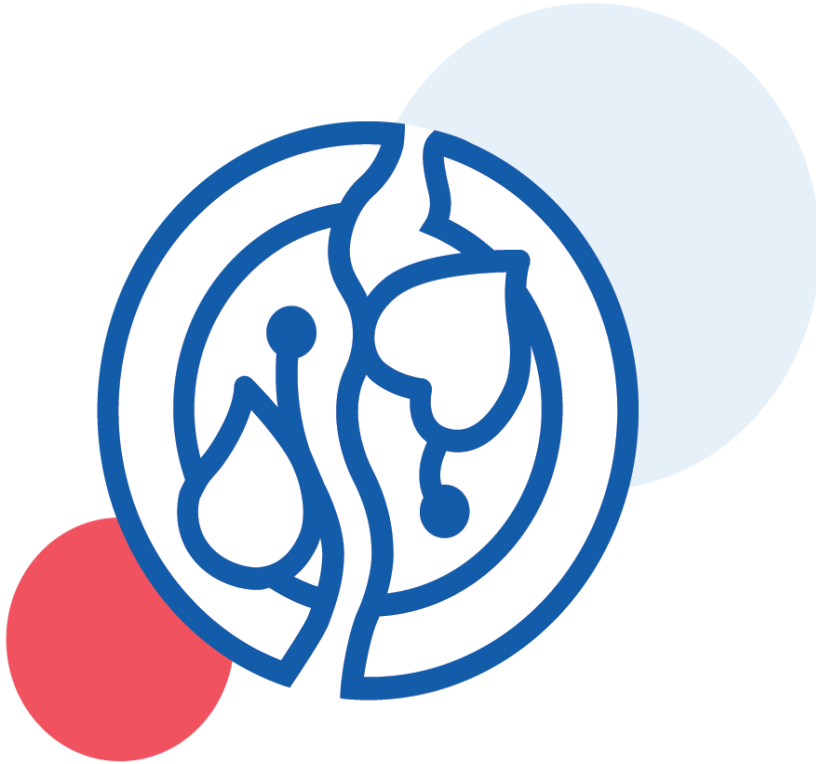




INDIVIDUAL SUBMISSION OF THE SLOVAK NATIONAL CENTRE FOR HUMAN RIGHTS

For consideration in the context of the review
of Slovakia during the Committee on Civil
and Political Rights' 145th session

February 2026



INTRODUCTION

The Slovak National Centre for Human Rights (Centre) is a national human rights institution (NHRI) established in the Slovak Republic, accredited with status B by the Global Alliance of National Human Rights Institutions (GANHRI). As an NHRI, the Centre is a member of the European Network of National Human Rights Institutions (ENNHRI). The Centre was established by the Act of Slovak National Council No. 308/1993 Coll. on the Establishment of Slovak National Centre for Human Rights. Pursuant to the Act No. 365/2004 Coll. on Equal Treatment in Certain Areas and on Protection from Discrimination, as amended (Anti-Discrimination Act), the Centre also acts as the only Slovak equality body. As an NHRI and equality body, the Centre performs a wide range of tasks in the field of protection and promotion of human rights and fundamental freedoms, including the principle of equal treatment. The Centre monitors and evaluates the observance of human rights and the equal treatment principle, including by monitoring compliance with international human rights treaties and recommendations of international human rights mechanisms.

The Centre hereby submits to the United Nations Office of the High Commissioner for Human Rights a written contribution in the context of the review of Slovakia during the 145th session of the Committee on Civil and Political Rights.

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1. Recent Constitutional Changes Affecting the Principle of International Law

As highlighted in the NHRI's 2026 Rule of Law Report (yet to be published): Slovak parliament approved sweeping constitutional changes on September 26, 2025, effective as of November 1, 2025. Centre has urged parliamentarians not to adopt the amendment as it is, in the view of the NHRI, in breach of international law, European law and poses a serious risk to protection of human rights. The proposal was widely criticized by the civil society and international institutions, including the Venice Commission which issued an urgent opinion on the draft.

New constitutional concepts of "national identity" and "cultural and ethical issues" were created with an open-ended and unclear definition and with the aim to restrict dynamic interpretation of human rights standards as provided by the UN Treaty Bodies, ECHR and others. The constitutional principle of primacy of European law and international human rights treaties was amended in a retroactive way to state that in areas covered by "national identity", Slovakia remains sovereign, i.e. the principle of primacy would not apply, which in the opinion of the Centre is in breach of European law as well as international law, chiefly the principle of *pacta sunt servanda*.

Further, these changes introduced new provisions concerning adoption (with the aim to bar same-sex couples from adoption in the future), education (with the aim to make sexual education conditional on written consent from a legal guardian) and a provision that Slovakia recognizes only "biologically determined" sex of man and woman, causing legal uncertainty for trans people and their right for legal gender recognition stemming from the right to respect their private and family life, while it is for the moment unclear what "biologically determined" means as it was added to the draft at the very end of parliamentary discussion.

Suggested questions for the State Party:

- Please provide information on guarantees and measures taken, if any, to ensure full enjoyment of rights provided by the Covenant in light of the recent Constitutional changes.
- Please provide information on how "national identity" and "cultural and ethical issues" are interpreted in the current Slovak legal order. Has the State Party conducted any human rights impact assessment of the recent constitutional changes?
- Please provide information on the impact of the new article 52a of the Slovak Constitution on the accessibility of legal gender recognition and gender-affirming healthcare. What forms of redress are available if these are denied?
- What measures have been taken to ensure that children's right to comprehensive education is respected also in the area of sexuality and reproductive rights (provided that such education is adapted to children's age and development, relevant and based on current scientific knowledge and human rights standards)?

2. Protection of Whistleblowers



The NHRI highlighted in its 2026 Rule of Law Report (yet to be published) the challenges regarding the protection of whistleblowers. In December, the Parliament adopted the Act on the Office for the Protection of Victims of Crime and Whistleblowers in a fast-track procedure without previous public consultation or consultation with experts or affected entities¹. The aim of the act was to abolish and replace the Whistleblower Protection Office as of January 1, 2026, with the newly established Office for the Protection of Victims of Crime and Whistleblowers, which was to become the legal successor to the Whistleblower Protection Office. Experts warned against the negative impacts of provisions introducing the obligation of prosecutors or administrative authorities to continuously review the fulfilment of conditions for protection already granted and introducing the possibility for employers to initiate a repeated review of the protection granted to whistleblowers. Experts, including the Office² itself further warned that the law was intended to replace the current leadership of the Office, despite having no legal or factual grounds for doing so. This view was also expressed by the President when he vetoed the law stating that the law's primary purpose did not appear to be the proclaimed protection of employers' rights or safeguarding against ongoing threats to fundamental rights and freedoms, but instead an ill-conceived and incomplete institutional and personnel restructuring. The President also raised concerns about the legislative procedure, potential violations of the principles of the rule of law and threats to the use of European Union funds. After the parliament voted to override the President's veto, the law was challenged at the Constitutional Court by 63 MPs and the motion was supported by the Public Defender of Rights. The Constitutional Court temporarily suspended the law until it rules on the matter itself.

Recommendations:

- The state party should strengthen independent institutions established as such to prevent political interference in performance of their duties, which are in public interest. Particularly, to refrain from sweeping reforms or transformations of these institutions without public consultation, participation and expertise, ensuring special care not to raise concerns of politicization of independent institutions.

3. Compensation Mechanism for Individuals Subjected to Unlawful Sterilisation

As reported by the NHRI in its written submission to the List of Issues Prior to Reporting under the CCPR³, the long-standing human rights challenge is to establish an effective compensation mechanism for individuals subjected to unlawful sterilisation between 1966-2004. This is despite

¹ Law of 9 December 2025 on the Office for the Protection of Victims of Crime and Whistleblowers, and on Amendments to Certain Laws.

² the Office for the Protection of Victims of Crime and Whistleblowers. 2025. We Reject Political Interference in the Independence of the Office for the Protection of Whistleblowers. Available in Slovak at: <https://www.oznamovatelia.sk/odmietame-politicke-zasahy-do-nezavislosti-uradu-na-ochranu-oznamovatelov/>.

³ Slovak National Centre for Human Rights. 2023. "Written submission for consideration when compiling the List of Issues Prior to Reporting (LoIPR) for Slovakia at the 139th session of the Human Rights Committee." Available at: https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=INT%2FCCPR%2FICS%2FSVK%2F55467&Lang=en.



the issue being continuously raised by various human rights institutions, including the most recent call from the Council of Europe Commissioner for Human Rights, Michael O’Flaherty⁴. In the government’s legislative plan for 2025, the Ministry of Justice stated that it aimed to propose legislation on the compensation mechanism in December 2025. However, no such legislation was proposed. Moreover, several proposals to establish the mechanism submitted by the opposition in parliament in 2025 were not supported.

Recommendations:

- The state party should pass a legislation establishing an effective and accessible remedy mechanism for individuals subjected to unlawful sterilisation. Such mechanism should include the proportionate financial compensation without re-traumatization, for example, ensuring that the burden of proof is not put on the survivors. This mechanism should be accompanied by information campaign in the language of national minorities.

4. Protection of Human Rights Defenders

Protection of Human Rights Defenders

As reported in the NHRI’s 2025 Rule of Law Report⁵, verbal attacks on civil society and HRDs are increasingly becoming part of the public discourse, including political discourse. Consequently, it is the Centre’s view that this further incites the general public to target hate towards civil society and HRDs. After consultation with various non-governmental organizations active in Slovakia, the Centre monitored online threats and harassment targeted at their representatives. Commonly used phrases used by public officials and general public to defame CSOs are “freeloaders”, “traitors”, “Soros people”, “agents of foreign power”, et cetera. Organizations working with LGBTI+ people reported attacks and life threats due to their gender identity. Consulted NGOs reported that such negative discourse also affects private lives of human rights defenders. The consulted NGOs reported excessive administrative controls on their projects. For instance, in less than a few months, one NGO experienced more than 10 administrative controls that were described as burdensome.

Moreover, as reported in the NHRI’s 2026 Rule of Law Report (to be published), findings of the research report of the Centre on environmental HRDs showed that up to 80 percent of surveyed environmental defenders in Slovakia have experienced some form of harassment, most commonly the spreading of false information and defamation⁶. Nearly half encountered hateful messages, spam, or phone-based attacks, along with personal insults and stalking. Some

⁴ O’Flaherty, Michael. 2025. “The Unheard 12 Million: The Unstoppable Voices of Roma and Traveller Women. Council of Europe, Commissioner for Human Rights.” Available at: <https://rm.coe.int/book-on-roma-and-travellers-the-unheard-12-million-the-unstoppable-voi/488028aa54>.

⁵ The Slovak National Centre for Human Rights. 2025. „The State of rule of law in Slovakia 2025“. Available at: <https://www.snslp.sk/wp-content/uploads/State-of-rule-of-law-2025.pdf>.

⁶ The Slovak National Centre for Human Rights. 2025. When the protection of environment is a risk: experience of human rights defenders. Available in Slovak at: <https://www.snslp.sk/wp-content/uploads/Ked-je-ochrana-zivotneho-prostredia-rizikom.pdf>.



reported threats of violence and several experienced physical attacks. Harassment often occurred repeatedly and in combined forms, such as verbal attacks accompanied by threats or legal pressure. The activities that carried the highest risk were social media engagement, field monitoring, reporting environmental violations, and public appearances in the media. Several individuals faced inspections, criminal complaints, or lawsuits.

Moreover, as the NHRI reported (yet to be published), there are no specific policies and mechanisms regarding the protection of HRDs. With the transposition of the EU's Anti-SLAPP directive still pending government approval, HRDs currently have no special safeguards in legal disputes and remain in the same position as any other individual. Another issue in the context of SLAPPs is that defamation remains a criminal offense, with some of the highest penalties in the EU, ranging from one to eight years of imprisonment. As a result, this crime is used as a tool of intimidation against HRDs.

Another issue related to the protection of HRDs is that strategic documents are not being translated into action. Despite the stated objectives of the civil society development strategy to build a favourable environment for civil society and increase systemic resilience, attacks and disinformation against civil society and non-governmental organizations have increased over the past few years.

Furthermore, non-governmental organizations also face various financial challenges, including cuts to public funding schemes and the absence of systemic and sustainable funding. This lack of resources affects the work of HRDs, the provision of services to affected communities, and their ability to protect themselves against SLAPPs and other attacks on their activities.

Recommendations:

- The State Party should ensure the protection of human rights defenders, as set in the Strategy of Civil Society Development in Slovakia for 2022–2030 and connected Action Plan, including the positive promotion of their work, sustainable, and long-term funding.
- The State Party should refrain from any types of attacks and harassment of human rights defenders and to ensure available and efficient protection provided to prevent and investigate these attacks, including from politicians.

5. The Right to Freedom of Expression and Media Freedom

Media Freedom

As reported in the 2026 The Rule of Report (yet to be published), Slovakia has fallen nine places in the latest Reporters Without Borders (RSF) World Press Freedom Index, ranking 38th—its worst position in the past 15 years. There are various issues concerning the recent decrease of media freedom in Slovakia. For example, as reported in the 2025 Rule of Law Report⁷, in 2024,

⁷ The Slovak National Centre for Human Rights. 2025. „The State of rule of law in Slovakia 2025“. Available at: <https://www.snslp.sk/wp-content/uploads/State-of-rule-of-law-2025.pdf>.



the public broadcaster RTVS was dissolved by the Act on Slovak Television and Radio in July. The NHRI protested during the public consultation procedure on grounds of protection of the freedom of media as well as several EU legal instruments to no effect. The new Act established a new institution named Slovak Television and Radio (STVR). This change has entailed, among others, the automatic dismissal of the Board of RTVS. The move was widely viewed as simply a tool to take over the Board and the Director's position by the government, as the Director's term would otherwise expire in 2027 and leader of the governing coalition party SNS has stated in the past that the public broadcaster should function as a "state television". As such, these changes have raised serious concerns about the independence of the public service broadcaster. Moreover, the current government has ceased communication with several mainstream media viewed as critical. Instead, representatives of the government have been increasingly engaging and promoting "alternative" media outlets known for spreading disinformation or misinformation. Several members of cabinet, parliamentarians and government appointees are former employees of such media⁸.

Protection of Journalists

The NHRI reported in its annual Rule of Law reporting also on the issue concerning the protection of journalists, who continue to face threats and harassment, including physical attacks⁹. A survey conducted in 2023 by the Investigative Centre of Ján Kuciak reported that 66.2% of Slovak journalists experienced an attack or threats in the past 12 months (while 4% experienced physical attack) and 47% think the number of incidents has increased over the last 5 years¹⁰. According to the survey, 33,3% of Slovak journalists think the intensity of verbal attacks by politicians has increased. The offence of defamation is also frequently used to intimidate and bully journalists and the media. In 2024, European Centre for Press and Media Freedom recorded a record number of incidents in Slovakia compared to previous years.

Between July 2024 and June 2025, the Investigative Center of Ján Kuciak analysed thousands of paid political ads in the Visegrad Four (V4) countries¹¹. In the V4, they identified 773 hateful political ads on Meta platforms that used offensive or derogatory language, 523 of which came from Slovakia. The analysis showed that the leading government party was among the largest sponsors of hateful ads in Slovakia. The paid attacks targeted the media, but also civil activists, human rights defenders, and non-governmental organizations. The analysis revealed that they mostly attacked through narratives framing them as enemies—accusing journalists and NGOs of

⁸ The Slovak National Centre for Human Rights. 2025. „The State of rule of law in Slovakia 2025“. Available at: <https://www.snslp.sk/wp-content/uploads/State-of-rule-of-law-2025.pdf>.

⁹ The Slovak National Centre for Human Rights. 2025. „The State of rule of law in Slovakia 2025“. Available at: <https://www.snslp.sk/wp-content/uploads/State-of-rule-of-law-2025.pdf>.

¹⁰ Investigative Center of Ján Kuciak. 2023. „Survey: Do Slovak journalists feel safe?“ Available in Slovak at: <https://www.icjk.sk/229/Vyskum-Citia-sa-slovenski-novinari-bezpecne>.

¹¹ Investigative Center of Ján Kuciak. 2025. Paid hatred: Attacks on journalists were most heavily sponsored by politicians in Slovakia and Hungary, while platforms failed to intervene. Available in Slovak at: <https://www.icjk.sk/419/Platena-nenavist-Utoky-na-novinarov-najviac-sponzorovali-politici-na-Slovensku-a-v-Madarsku-platformy-nezakrocili>.



treason, spreading lies, or defending foreign interests. Almost three-quarters of the ads were based on the disinformation framework that the media or civil society were spreading fake news.

Recommendations:

- The State Party should restore and provide for immediate legal safeguards for the independence and editorial autonomy of the public broadcaster.
- The State Party should set up an independent office with sufficient resources, tasked with debunking viral online hoaxes and disinformation, in order to ensure that the right to access objective information and facts is being guaranteed within a pluralistic media environment.
- The State Party should refrain from any personal attacks on members of the media, including direct verbal harassment and indirect incitement of hatred online.

6. Participation in the Public Debate and Freedom of Assembly

Participation in the Public Debate

As previously highlighted in ENNHRI's 2025 Report¹² and reported in the 2026 Rule of Law Report (to be published), fast-track legislative procedure remains an issue in Slovakia, threatening legal certainty and limiting public participation. According to the official parliamentary statistics which only cover the period until June 30, 2025, during this government's term the parliament approved 193 pieces of legislation, out of which 52 were fast-tracked, meaning 25 percent of all laws passed did not go through a public consultation process and were fast-tracked through parliament, limiting discussion time.

In the NHRI's recent publication¹³, environmental HRDs pointed out that there are various barriers for civil society to participate in law-making processes. For example, the commenting procedures are set to a minimum number of days and often begin only after criticism from civil society. These procedures are sometimes announced before holidays, which gives HRDs less time to respond. This may be particularly challenging for individuals with caretaking responsibilities (predominantly women in Slovakia), who may not have enough time to participate in these processes. HRDs perceive these participatory processes as very formalistic taking place just for the sake of procedure while their expertise is doubted and their arguments ignored.

Furthermore, changes to critical environmental legislation, such as the Nature and Landscape Protection Act, were introduced through amendments proposed in Parliament, even in cases, when the parliamentarians cooperate on the legislation with the representatives of the ministry. To influence proposed legislation in parliament, organizations need much more internal capacities to advocate for their positions with parliamentarians, for example through open

¹² The Slovak National Centre for Human Rights. 2025. „The State of rule of law in Slovakia 2025“. Available at: <https://www.snslp.sk/wp-content/uploads/State-of-rule-of-law-2025.pdf>.

¹³ The Slovak National Centre for Human Rights. 2025. When the protection of environment is a risk: experience of human rights defenders. Available in Slovak at: <https://www.snslp.sk/wp-content/uploads/Ked-je-ochrana-zivotneho-prostredia-rizikom.pdf>.



letters. Moreover, there is no mechanism in place in parliament for public consultation that would enable parliamentarians to hear collective comments issued by various actors, including HRDs and non-governmental organizations.

Freedom of Assembly

As reported in the NHRI's 2025 Rule of Law Report¹⁴, in June 2024, the parliament adopted the Act on some measures to improve the security in the Slovak Republic (so-called "lex assassination attempt")¹⁵ in an accelerated legislative procedure without a previous participatory process. According to the government, the reason for submitting the draft law was to reflect the security situation in the Slovak Republic after the assassination attempt on the Prime Minister on 15 May 2024. The Act covers a broad range of topics thus amending several acts including the Act on the Right to Assemble. It restricts the possible locations where an assembly may take place and introduces new grounds for prohibiting an assembly. The Act introduces a blanket prohibition of assemblies within 50 meters from certain public buildings and introduces new grounds for municipalities to prohibit assemblies.

The Centre requested the Democratic Institutions and Human Rights (ODIHR) to review the draft law with specific focus on the right to freedom of assembly. In response, ODIHR prepared an Urgent Interim Opinion¹⁶ focusing on the most concerning provisions relating to the right to freedom of peaceful assembly. According to the Opinion, the proposed amendments relating to the right to freedom of peaceful assembly present serious deficiencies in terms of compliance with international human rights standards and OSCE human dimension commitments.

Recommendations:

- The State Party should strengthen participatory processes, in order to include persons affected by proposed legislation, including legislation proposed in parliament, have an opportunity to be heard. Ensure that proposed legislation is data-driven and based on current, expert opinions and in line with Slovakia's human rights obligations.

7. Right to Freedom of Association

¹⁴ The Slovak National Centre for Human Rights. 2025. „The State of rule of law in Slovakia 2025“. Available at: <https://www.snslp.sk/wp-content/uploads/State-of-rule-of-law-2025.pdf>.

¹⁵ Law No. 166/2024 Coll. ("Law on certain measures to improve the security situation in the Slovak Republic") was adopted by the National Council of the Slovak Republic on 27 June 2024. Available in Slovak at: <https://www.slov-lex.sk/ezbierky/pravne-predpisy/SK/ZZ/2024/166/20240715.html>.

¹⁶ ODIHR Panel of Experts on Freedom of Assembly and Association. 2024. "Urgent interim opinion on article I of the draft act on "some measures to improve the security situation in the Slovak Republic." Available at: https://legislationline.org/sites/default/files/2024-06/2024-06-25%20FINAL%20ODIHR%20Urgent%20Interim%20Opinion%20on%20Freedom%20of%20Peaceful%20Assembly_Slovak%20Republic_ENGLISH.pdf



In the 2025 Rule of law report¹⁷, the NHRI reported on the so-called NGO Act that was submitted to the parliament in March 2024. Initially, the law aimed to introduce an obligation for NGOs that receive financial or other material benefits, exceeding EUR 5,000 for a calendar year, from a foreign natural or legal person, to register as an “organisation with foreign support” and to indicate this designation in all acts in the course of their operations. This obligation was later replaced in the bill by an obligation to register for „lobbying“ activities. The bill was amended several times before it was adopted in April 2025, while some of the most disputed provisions including the above-mentioned obligations were removed. The adopted law requires all forms of non-governmental organizations (associations and organizations with an international element if their income exceeds EUR35,000 in a calendar year) to indicate in their reports an overview of income and expenditure by source, overview of persons who contributed to the activities of the non-governmental organization, including the amount of the contribution and the identification data of natural persons if their contribution exceeded EUR 5,000 per year, and the identification data of legal persons regardless of the amount of their contribution. The law also introduces the right of the Ministry of the Interior or the relevant registration authority to evaluate the content of the report and to process personal data contained in the reports even without the consent of the data subject. Another significant obligation is the inclusion of non-governmental organizations in the scope of obligated persons under the Freedom of Information Act, which constitutes an excessive administrative burden for NGOs. A group of MPs and the Public Defender of Rights initiated proceedings before the Constitutional Court, upon which the Constitutional Court concluded in December 2025 that the contested law was unconstitutional, as it was not in compliance with the right to privacy, right to information and freedom of association as established by the Constitution and the Convention for the Protection of Human Rights and Fundamental Freedoms (reported in the yet to be published 2026 Rule of Law Report).

Recommendations:

- The State Party should ensure that any future amendments to the NGO Act are developed through consultations with civil society and non-governmental organizations using participatory and evidence-based legislative processes.

8. Foreign Police and Access to Legalization of Status of Non-Citizens

NHRI also reported in its 2026 Rule of Law report (yet to be published) on the ongoing issue with capacity at the Units of Foreign Police within the Police Force. Consequently, foreign nationals face hindered access to legalizing their status. For example, individuals eligible for temporary protection sometimes must wait more than 90 days for appointments, during which they lack access to healthcare and the labour market, which puts them in a vulnerable position. This is due to various factors, including insufficient number of staff compared to the increasing number of foreign nationals requesting appointments. Moreover, the appointment reservation system is

¹⁷ The Slovak National Centre for Human Rights. 2025. When the protection of environment is a risk: experience of human rights defenders. Available in Slovak at: <https://www.snslp.sk/wp-content/uploads/Ked-je-ochrana-zivotneho-prostredia-rizikom.pdf>.



overwhelmed and vulnerable to fraud. As a result, time slots at the police are being traded on Facebook and Telegram groups.

Recommendations:

- The State Party should ensure to increase the capacities and capabilities of the Border and Foreigners Police to effectively process requests for legalization of status made by foreign nationals.

9. Guardianship of Unaccompanied Minors

As reported in the NHRI's submission to CESCR¹⁸, the guardianship of unaccompanied minors (e.g., migrant children) remains a long-standing unresolved issue. Although Slovakia is bound by international conventions, practice shows that the system of guardianship for these children is inconsistent and often merely formal. There is a lack of (1) sufficiently trained guardians, (2) clear legislative rules for the performance of guardianship duties, and (3) adequate conditions for the care and integration of children into society.

It is also important to note the current wording of the Act on Social and Legal Protection of Children and the legislative powers of municipalities, which stipulate that guardianship should be a temporary measure and should gradually transition into custodianship, which is to be carried out by the municipality.

Recommendations:

- The State Party should reform the guardianship system for unaccompanied minors, meaning clearly define competencies, expand legislation to include the concept of a separated child, and establish support and protection frameworks for such children, ensuring professional support and funding for guardians.
- The State Party should introduce a monitoring mechanism, meaning regularly assess access to social services and their quality in terms of compliance with human rights and children's rights, including the unaccompanied minors.

¹⁸ Slovak National Centre for Human Rights. 2025. "Individual submission for consideration when compiling the List of Issues Prior to the Reporting for the 79th Session of the Committee on Economic, Social and Cultural Rights." Available at: https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=INT%2FCESCR%2FICO%2FSVK%2F67706&Lang=en.