COMMITTEE OF MINISTERS
COMITÉ DES MINISTRES
COUNCIL OF EUROPE
CONSEIL DE L'EUROPE

1531st meeting, 10-12 June 2025 (DH)

H46-23 Talpis group v. Italy (Application No. 41237/14)

Supervision of the execution of the European Court's judgments

Reference document
CM/Notes/1531/H46-23

Decisions

The Deputies

1. recalled that this group of cases concerns the ineffective and delayed response of the authorities to the applicants' complaints concerning domestic violence, the discriminatory aspect of such failings in the protection of women against domestic violence and the secondary victimisation of one of the applicants due to the gender stereotypes characterising the judicial decision in her case;

As regards individual measures

2. noted with regret that the proceedings against the aggressors of the applicants in *De Giorgi* and *M.S.*, were terminated due to the expiration of the statute of limitation; noting that additional relevant proceedings are still pending in *De Giorgi*, called on the authorities to provide information on their outcome;

3. noted that no further individual measures are required in *Landi* and possible in *M.S.*, decided to close their supervision of the *Landi* judgment and adopted Final Resolution CM/ResDH(2025)133;

4. considered that the information according to which the applicant in the *De Giorgi* case has not made use of the available remedies to complain against the attachment of the sums awarded by the European Court can be considered as indication that she accepted this procedure to repay her fiscal debts; called nevertheless on the authorities to clarify if the relevant legal framework allows them to assess the conformity of the attachment of the sums awarded by Court to the practice of the Committee of Ministers before the attachment is made and, where appropriate, consider adopting the necessary measures to this end;

As regards the general measures

5. welcomed the additional efforts of the authorities since the last examination of these cases which confirm their enduring determination to address the complex problem of violence against women, including through amendments of the legal framework, allocation of financial resources, as well as strengthening and monitoring of judicial practices;

6. emphasised once again that the execution of these judgments requires that the remedial actions adopted generate tangible and measurable positive trends reflecting effective responses by law enforcement agencies and the judiciary to reported acts of domestic violence;

7. noted the available information reflecting an increase in reports of domestic and sexual violence and in the adoption of police cautions; noted also the concerning persistence of high numbers of proceedings dismissed before trial; urged the authorities to provide the information and statistics outlined in the analysis prepared by the Secretariat for the present examination, including on the final results of the survey on gender stereotypes, to allow a comprehensive assessment of the progress achieved;

8. noted with interest the decision adopted in 2025 by the High School of the Judiciary to improve and expand relevant trainings for the judiciary; called on the authorities to ensure that at least some of these trainings become mandatory and cover also the specific nature and dynamics of domestic violence and, as previously requested, the use of a gender sensitive judicial language; noted also with interest, in this context, the ongoing legislative reform aimed at establishing the obligation for judges and prosecutors to attend at least one training course in this area, and invite the authorities to keep the Committee informed of its final adoption;

9. noting the guidelines and protocols adopted to improve the performance of judicial offices, invited the authorities to provide information on the diffusion of these practice at national level, the progress made through their application and the results of the ongoing monitoring of their implementation;

10. requested the authorities to provide the above-mentioned elements by 30 March 2026 at the latest and decided to resume the examination of these cases at one of their Human Rights meetings in the second half of 2026.