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## **EUROPEAN SOCIAL CHARTER**

Comments submitted by  
Public Defender of Georgia  
concerning the 17<sup>th</sup> National Report on the implementation of  
the European Social Charter

submitted by  
**THE GOVERNMENT OF GEORGIA**  
Articles 2, 3, 4, 5, 6, and 20

Comments registered by the Secretariat  
on 11 July 2025

**CYCLE 2024**



**Comments regarding the 17<sup>th</sup> National Report on the implementation of the  
European Social Charter Submitted by the Government of Georgia**

**Prepared and submitted by Public Defender's Office of Georgia (NHRI) 2025**

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The Public Defender's Office of Georgia (hereinafter the PDO) hereby presents comments regarding the 17th National Report on the implementation of the European Social Charter submitted by the Government of Georgia to the European Committee of Social rights (hereinafter the European Committee). The PDO comments on the information contained in the state party report in response to the European Committee's questions<sup>1</sup> and addresses other matters that may also be relevant for the European Committee within the reporting procedure.

## Article 2 –The right to just conditions of work

### Article 2§1 Reasonable daily and weekly working hours

**a) Please provide information on occupations, if any, where weekly working hours can exceed 60 hours or more, by law, collective agreements or other means, including:**

- **information on the exact number of weekly hours that persons in these occupations can work;**
- **information on any safeguards which exist in order to protect the health and safety of the worker, where workers work more than 60 hours.**

The state party report reviews legislative reform of the Labour Code of Georgia undergone in 2020, under which the normal amount of weekly working hours should not exceed 40 hours while in those enterprises which have specific working regime that time should not be more than 48 hours.<sup>2</sup> Hence, according to the report, there is no employment sector where the weekly working time exceeds 60 hours. Furthermore, the statistical data presented in the report reflects average factual working hours by the sectors of employment.<sup>3</sup> However, it does not provide any information on work performed by juveniles and civil servants.<sup>4</sup>

In its 2022 Conclusion on Georgia European Committee of Social Rights asked the Government to provide specific information on proactive action taken by the authorities to ensure the respect of reasonable working hours..<sup>5</sup> In response to this issue the state report notes that out of 917 inspections, conducted in the first half of 2024, only 195 pertained to

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<sup>1</sup> Proposed questions from the European Committee of Social Rights for the next statutory report Group 1 To be submitted by States Parties not having accepted the collective complaints procedure by 31 December 2024, available at: <https://shorturl.at/yPaT1> [30/06/2025]

<sup>2</sup> 17th National Report on the implementation of the European Social Charter submitted by the government of Georgia 31/12/2024 p. 3, <https://shorturl.at/3ds1o> [16/06/2025].

<sup>3</sup> *ibid*, p.4.

<sup>4</sup> *ibid*.

<sup>5</sup> European Committee of Social Rights Conclusions on Georgia 2022 p. 5, <https://shorturl.at/RC71q> [16/06/2025].

overtime and its proper remuneration, the report does not contain the specifics about them.<sup>6</sup> Hence, the state report provides only a limited answer as to how the working time, established under the law, is observed in practice.

The PDO underlines that the current Georgian legislation creates a likelihood of factual working hours far exceed 60 hours a week. In fact, Labour Code of Georgia does not define the upper limit of the overtime work except for work performed by minors.<sup>7</sup> Similarly, the Law on Public Service establishes that a weekly working time, including overtime, should not exceed 48 hours.<sup>8</sup> Furthermore, under Article 24 of the Labour Code of Georgia the total length of an uninterrupted rest period between working days/shifts should not be less than 12 hours.<sup>9</sup> Apart from that an employee has the right to rest for at least 24 hours continuously during a 7-day period.<sup>10</sup> Such a provision opens an opportunity whereby an employee may work for more than 60 hours a week.<sup>11</sup>

The Public Defender's Office does not have a direct mandate to oversee how the regulations set out in the Labor Code are implemented. However, based on an examination of applications submitted to the PDO from a penitentiary institution in 2024 and 2025, it was revealed that the working hours of inmates engaged in prison labor, as well as those working for private enterprises within the prison facilities, have not been properly recorded. As a result, prisoners are essentially working overtime.<sup>12</sup>

This is especially problematic since these inmates remain under constant surveillance and control of the employer (i.e. Special Penitentiary Service, Ministry of Justice) even after the official working time and are hence vulnerable.<sup>13</sup> The PDO addressed the authorities with a proposal to ensure that the working hours of defendants/convicts engaged in prison labour are recorded/counted on the territory of all penitentiary establishments in accordance with the procedure established by legislation.<sup>14</sup> The similar complaint was also entertained by the Labor

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<sup>6</sup> 17th National Report on the implementation of the European Social Charter submitted by the government of Georgia 31/12/2024 p.5 <https://shorturl.at/3ds1o> [16/06/2025].

<sup>7</sup> *ibid*, p.3.

<sup>8</sup> Law on Public Service, Article 61, <https://rb.gy/3gtpwf> [16/06/2025].

<sup>9</sup> 17th National Report on the implementation of the European Social Charter submitted by the government of Georgia 31/12/2024 p.3 <https://shorturl.at/3ds1o> [16/06/2025].

<sup>10</sup> *ibid*.

<sup>11</sup> If an employee works for 12 hours a day under Article 24 of the Labour Code of Georgia, his/her total amount of work performed during a week may be 72 hours excluding resting time.

<sup>12</sup> Report of the Pubic Defender of Georgia On the Situation of Protection of Human Rights and Freedoms in Georgia 2024, p. 223-225, <https://shorturl.at/6FmLG> [16/06/2025].

<sup>13</sup> *ibid*, p. 223.

<sup>14</sup> *ibid*.

Inspector's Office which also found the same violation.<sup>15</sup> Hence, in its Annual Report of 2024 the PDO recommended the Labor Inspector's Office to conduct planned annual inspections to penitentiary establishments.<sup>16</sup>

Despite the recommendation the PDO obtained information from the same prison that the working time still had not been recorded by the authorities as per the procedure set by law. The PDO forwarded that finding to the Labor Inspector's Office which pledged to conduct systemic inspections in prisons.<sup>17</sup> They followed through that pledge and on March 28<sup>th</sup> 2025 established multiple violations of prisoners' right to work.

In addition, the Law on Public Service specifies that an employee may perform overtime work only based on the written assignment from a supervisor.<sup>18</sup> The law does not regulate a situation whereby overtime work has been imposed on a public servant verbally and not in writing. To this end, the PDO inquired from the Labor Inspector's Office as to how many violations of overtime regime have been established since January 1 of 2024 to May 30 of 2025. According to the data received 553 violations have been established about the aspects of both imposition and remuneration of overtime work in the private sector, while the LIO has inspected 7 public bodies but found no violations of overtime regulations<sup>19</sup>

Furthermore, the PDO reiterates that the issue of platform workers is still very problematic as their legal relationship with their employer is still governed by service contract regulations.<sup>20</sup> The PDO has examined the nature and character of it and concluded that it should be qualified as a labor relationship and hence the platform workers should have guarantees enshrined in the Labor Code of Georgia.<sup>21</sup> The employer did not share the findings of the PDO in this regard.<sup>22</sup>

In such context the platform workers may be subject to work more than 60 hours a week because they have no strict legal protections, such as those pertain to fixed working hours, time of rest, time of leave and etc.

**b) Please provide information on the weekly working hours of seafarers.**

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<sup>15</sup> Recommendation of the Office of Public Defender issued on 09/09/2024, №2024/4355 <https://rb.gy/r4e2yp> [17/06/2025].

<sup>16</sup> Report of the Pubic Defender of Georgia On the Situation of Protection of Human Rights and Freedoms in Georgia 2024, p. 225, <https://shorturl.at/6FmLG> [16/06/2025].

<sup>17</sup> The Letter of June 11<sup>th</sup> 2025 N LIO 6 25 00647020.

<sup>18</sup> Law on Public Service, Article 61 para.1, <https://rb.gy/3gtpwf> [16/06/2025].

<sup>19</sup> Letter of June 18<sup>th</sup> 2025 N LIO 3 25 006800112024.

<sup>20</sup> See <https://shorturl.at/82H4v> [27/06/2025]

<sup>21</sup> *ibid.*

<sup>22</sup> See <https://shorturl.at/SW8y1> [27/06/2025]

The state report provides a legislative overview about their working hours and time of rest.<sup>23</sup> However, it is noteworthy that the Law on the Labor of Seafarers does not define weekly working hours of adult employees as opposed to children over 16 years of age.<sup>24</sup> Such legislative arrangement in and of itself creates important risks through human rights lens.

#### Article 4 –The right to fair remuneration

##### Article 4§3 Right of men and women to equal pay for work of equal value

***a) Please indicate whether the notion of equal work and work of equal value is defined in domestic law or case law.***

According to the gender impact assessment of the law of Georgia on public service, which was conducted by UN Women and the Civil Service Bureau of Georgia in 2023, The Law of Georgia on Public Service falls short of promoting substantive equality and does not provide for implementing special measures to eliminate existing gender inequality in the public service sector and calls for amendments to the law to ensure substantive equality.<sup>25</sup>

Georgian legislation and case law does not define the notions of equal work and work of equal value. The equal pay principle applies both to equal work and to work of equal or comparable value. As it was noted in the Conclusions of the Committee, adopted in 2022, Georgian legislation still does not envisage specific, explicit principle of equal pay for work of equal value for women and men that would be in conformity with the Committee’s standards.<sup>26</sup>

The Committee assessed the wording of Article 4 of the Labour Code of Georgia which provides the obligation of the employer to ensure equal pay for male and female employees in case of equal performance of work.<sup>27</sup> According to the Committee that wording is narrow as it does not specifically refer to equal pay for women and men for “*work of equal or comparable value*”.<sup>28</sup> The similar flaw has been identified by the Committee while reviewing the relevant

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<sup>23</sup>17th National Report on the implementation of the European Social Charter submitted by the government of Georgia 31/12/2024 p. 6-7 <https://shorturl.at/3ds1o> [16/06/2025]

<sup>24</sup> Law on Labour of Seafarers, Article 5 para. 4; Article 11. (available only in Georgian) <https://shorturl.at/uRjXM> [24/06/2025].

<sup>25</sup>Gender Impact Assessment of the law of Georgia on Public Service, brief document, UN Women, p.4, <https://shorturl.at/0mRHB> [24/06/2025].

<sup>26</sup> European Committee of Social Rights Conclusions on Georgia 2022, p. 14, <https://shorturl.at/RC71q> [16/06/2025].

<sup>27</sup> 17th National Report on the implementation of the European Social Charter submitted by the government of Georgia 31/12/2024 p. 8, <https://shorturl.at/3ds1o> [16/06/2025].

<sup>28</sup>European Committee of Social Rights Conclusions on Georgia 2022, p. 14, <https://shorturl.at/RC71q> [16/06/2025].

legislation on remuneration in civil service.<sup>29</sup> There have been no updates in this regard throughout the reporting period.

The Office of the Public Defender of Georgia recently requested and analyzed court decisions on discrimination cases covering the period from 2021 to 2023. None of the decisions received concerned the issue of equal work and work of equal value.

**b) Please provide information on the job classification and remuneration systems that reflect the equal pay principle, including in the private sector.**

The state party report extensively reviews then-existed system of job classification and remuneration in civil service.<sup>30</sup>

On December 13, 2024 the legislative process carried out in an accelerated manner, without the involvement of stakeholders or relevant specialists led to the adoption of the package of amendments to the Law of Georgia on Public Service, which significantly reduced the guarantees of labor rights of public servants. Because of these amendments, the rank-based meritocratic system of public service has been seriously deteriorated. In fact, heads of structural units as well as their deputies, previously been attributed to the first and second ranks and have been appointed indefinitely, are no longer professional public servants.<sup>31</sup> Instead, they can be hired for a limited term through an administrative contract.<sup>32</sup> Moreover, if public servants are being dismissed after a reorganization they no longer have a right to seek reinstatement at work through judicial means.<sup>33</sup>

In addition, the new amendments to the law has undermined the guarantees of public servants in a following way: the public servants are now being evaluated in every 6 months instead of the previously existed annual evaluation system and if they get an unsatisfactory grade, 20% of their salary will be on hold for the duration of another 6 months;<sup>34</sup> The head of a public institution is allowed to change the evaluation results of a public servant within a month after the evaluation of the servant is being submitted.<sup>35</sup> This threatens the stability of a workplace for an employee as he/she is being put in an unforeseeable position to govern his behavior at

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<sup>29</sup> *ibid*, p.15.

<sup>30</sup> 17th National Report on the implementation of the European Social Charter submitted by the government of Georgia 31/12/2024 p.8-10, <https://shorturl.at/3ds1o> [16/06/2025].

<sup>31</sup> Report of the Public Defender of Georgia On the Situation of Protection of Human Rights and Freedoms in Georgia 2024, p. 221 <https://shorturl.at/6FmLG> [16/06/2025].

<sup>32</sup> *ibid*.

<sup>33</sup> The Law on Public Service, Article 118, para. 6, <https://rb.gy/6vdznd> [16/06/2025].

<sup>34</sup> *ibid*, Article 53 para. 1 and 10.

<sup>35</sup> *ibid*, Article 53 para. 9.



work. Such provision also, quite naturally, increases the risk of arbitrariness from the head of the public institution as the law does not set out strict criteria for changing the grade.<sup>36</sup>

The PDO underlines that such amendments severely undermine the legal guarantees of the public servants they previously possessed to effectively exercise their right to work.<sup>37</sup> The similar conclusion was shared by the Committee of Experts as the regime described above was assessed as being not in compliance with the International Labor Convention.<sup>38</sup>

**Please provide information on existing measures to bring about measurable progress in reducing the gender pay gap within a reasonable time. Please provide statistical trends on the gender pay gap.**

The state party report indicates that the gender pay gap remains a serious problem in Georgia and provides data that reflects the trend of gender pay gap.<sup>39</sup> Moreover, the report indicates that the inspections conducted by the Labour Inspector's Office have not revealed any discriminatory practices in remuneration.<sup>40</sup>

Yet, the report does not indicate whether the authorities undertook any measure to increase awareness of employees on the right to equal pay for equal work with examples of its violations.<sup>41</sup>

As far as the jurisprudence of the PDO is concerned, an application concerning the gender pay gap in the private sector was lodged before the Office only once, in 2020. The applicant claimed that, in a wood processing factory, women received lower hourly remuneration than men. However, the examination of the case did not establish discrimination, and the case was closed.

As regards the public sector, in December 2024 PDO has requested information from the Civil Service Bureau of Georgia regarding the implementation of the principle of equal pay for work of equal value. Based on the statistical data received, the distribution of individuals employed in managerial positions is as follows: 78.9% (885) are men and 21.1% (237) are women. Although this, in itself does not provide clear information on equality of remuneration or that

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<sup>36</sup> *ibid.*

<sup>37</sup> Report of the Public Defender of Georgia On the Situation of Protection of Human Rights and Freedoms in Georgia 2024, p. 222 <https://shorturl.at/6FmLG> [16/06/2025].

<sup>38</sup> Committee on the Application of Standards CAN/PV.10/Georgia-C.87, 06/06/25 p. 20, <https://shorturl.at/VdXwC> 18/06/2025.

<sup>39</sup> 17th National Report on the implementation of the European Social Charter submitted by the government of Georgia 31/12/2024 p.11-12, <https://shorturl.at/3ds1o> [16/06/2025].

<sup>40</sup> *ibid.*, p. 10.

<sup>41</sup> *ibid.*, p. 10-12.

of equal value it serves as useful guidance to show underrepresentation of women in managerial positions of civil service.

## Article 5- Right to Organize

*a) Please indicate what measures have been taken to encourage or strengthen the positive freedom of association of workers, particularly in sectors which traditionally have a low rate of unionisation or in new sectors (e.g., the gig economy).*

It is noteworthy that the Committee, in its Conclusions adopted in 2022, requested an information on whether the platform workers are protected against discrimination on the grounds of trade union membership and enjoy with the right to organize.<sup>42</sup> The state party Report contains no information as to what measures have been taken to ensure that platform workers enjoy the right to organise and are protected against discrimination on grounds of trade union membership.<sup>43</sup> Yet, the problem persisted and , the PDO, under equality mandate, has examined a case whereby an employee had not been provided with guarantees under Labour Law as his employer perceived that legal relationship with the employee did not fall in the scope of labour law but was regulated under the norms pertaining to service contracts. In this case trade union activity had been a ground for discriminatory treatment and termination of a contract.<sup>44</sup>

However, after the PDO's recommendation an employer concerned has been reinstated but the employer did not share PDO's concerns on legal nature of the relationship, and it is still regulated under the service contract legislation.<sup>45</sup>

In this context, it should be noted that after having examined several cases relating to the violations of the rights of trade unions and alleged discrimination on the grounds of the trade union membership, on September 4, 2023, the Public Defender of Georgia addressed the Advisory Council of the Chief Labour Inspector of the State Labour Inspection Service with a general proposal to develop recommendations aimed at the proper protection of collective labour rights and prevention of discrimination on the basis of trade union membership.<sup>46</sup> The General Proposal has not been yet fulfilled.<sup>47</sup>

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<sup>42</sup> European Committee of Social Rights Conclusions on Georgia 2022, p. 21, <https://shorturl.at/RC71q> [16/06/2025].

<sup>43</sup> 17th National Report on the implementation of the European Social Charter submitted by the government of Georgia 31/12/2024 p.12, <https://shorturl.at/3ds1o> [16/06/2025]

<sup>44</sup> For example, see:]<https://shorturl.at/vUaKs> [24/06/2025]

<sup>45</sup> See <https://shorturl.at/CMTdb> [26/06/2025]

<sup>46</sup> Brief summary of the case available at: <https://rb.gy/tnlw36> [17/06/2025]

<sup>47</sup> Letter of June 21 2024, LIO 8 24 00671783

Furthermore, amendments in the Law of Public Service have already been relied upon to dismiss many civil servants according to information spread in public sources. The Public Defender's Office has proactively contacted 41 dismissed persons and provided detailed information on the procedures for case proceedings and how to apply to the Office.<sup>48</sup> It is noteworthy that some of them have applied to the PDO. They allege discrimination on the basis of their political expression and dissent.

11 applications were filed with the Public Defenders' Office on behalf of 23 individuals alleging discrimination in labour relations on the ground of their political/different opinion. Currently, out of 11 applications the PDO is examining 6 applications while other applicants have addressed to courts.

***Please indicate whether and to what extent the right to organize is guaranteed for members of the police and armed forces.***

The state report correctly provides that under the Georgian Constitution everyone has the right to establish and join trade unions in accordance with the provisions established by organic law, thus making no exception for the servicemen of Georgian Defence Forces.<sup>49</sup> However, the Law on Trade Unions points at special legislation for regulating the issue of trade unions in the Ministry of Defence and the Ministry of Internal Affairs of Georgia.<sup>50</sup>

Yet, neither the Law on Police nor the Defense Code of Georgia provides a legal machinery through which members of the police force and soldiers will be able to realize their right to organize.<sup>51</sup> Nevertheless, the Defense Code of Georgia at least provides that “a servicemen/women have rights and freedoms guaranteed for a citizen of Georgia. Those rights and freedoms can be subjected to partial limitations proportional to the needs of military service.”<sup>52</sup>

The systemic reading of that provision implies that those who serve in Georgia's Defense Forces are not completely deprived of their right to organize but its exact scope remains vague. And as far as the police is concerned the authorities have failed to furnish the Committee with

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<sup>48</sup> See the statement of the Public Defender, available at: <https://shorturl.at/GYiNy> [30/06/2025]

<sup>49</sup> 17th National Report on the implementation of the European Social Charter submitted by the government of Georgia 31/12/2024 p.13, <https://shorturl.at/3ds1o> [16/06/2025]

<sup>50</sup> *ibid.*

<sup>51</sup> Law on Police, available at: <https://shorturl.at/hBLbO> [16/06/2025]; Defense Code of Georgia, available at: <https://shorturl.at/xN9vI> [16/06/2025] (available only in Georgian)

<sup>52</sup> Defense Code of Georgia, Article 32.1, <https://shorturl.at/xN9vI> [16/06/2025]

the information it has specifically requested about whether police officers have actually formed or joined a trade union.<sup>53</sup>

## Article 6 –The right to bargain collectively

### Article 6§4 Collective action

*a) Please indicate:*

- *the sectors in which the right to strike is prohibited;*
- *those sectors for which there are restrictions on the right to strike;*
- *sectors for which there is a requirement of a minimum service to be maintained.*

*Please give details about the relevant rules concerning the above and their application in practice, including relevant case law.*

In its previous Conclusions the Committee underlined that the situation was incompatible with the Committee's standards since the police were entirely prohibited to strike.<sup>54</sup> The Committee has noted that, an absolute prohibition to strike for police units was incompatible with the Committee's standards.<sup>55</sup>

Although the state fully answers the questions posed by the Committee, it does not address the justifiability of the absolute prohibition of the right to strike for the police officers.<sup>56</sup> It further does not underline the measures taken to make the right properly accessible and practical for them considering the specificities of the police work.<sup>57</sup>

Moreover, the report does not contain examples of actual cases of strikes to examine the regulatory framework in practice.<sup>58</sup>

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<sup>53</sup> 17th National Report on the implementation of the European Social Charter submitted by the government of Georgia 31/12/2024 ps.12- 13, <https://shorturl.at/3ds1o> [16/06/2025]

<sup>54</sup> European Committee of Social Rights Conclusions on Georgia 2022, p. 28, <https://shorturl.at/RC71q> [16/06/2025].

<sup>55</sup> *ibid.*

<sup>56</sup> 17th National Report on the implementation of the European Social Charter submitted by the government of Georgia 31/12/2024, ps.19-20, <https://shorturl.at/3ds1o> [16/06/2025]

<sup>57</sup> *ibid.*

<sup>58</sup> *ibid.*

## Article 20 Right to equal opportunities between women and men

According to the national survey published by the UN Women in 2023, 59.9% of women and 74.7% of men still believe that the most important role of a woman is to run the household.<sup>59</sup> Such attitudes increase the burden of housework and unequal duty of care on women.

- a) **Please provide information on the measures taken to promote greater participation of women in the labour market and to reduce gender segregation (horizontal and vertical). Please provide information/statistical data showing the impact of such measures and the progress achieved in terms of tackling gender segregation and improving women's participation in a wider range of jobs and occupations.**

Government of Georgia in its report refers that the Civil Service Bureau (CSB) coordinates and analyses the state of the public service in compliance with the legislation, developing recommendations and guidelines to offer methodological support to public institutions and strengthen the capacity of public servants. The CSB, supported by the UN Women, has created a practical guide on gender-responsive employment policies to help public institutions understand and implement these policies within their human resources management processes.<sup>60</sup>

The Civil Service Bureau is abolished from 1 April 2025 because the policy changes planned across civil service throughout 2025-2028 require direct involvement of the Administration of Government which took over the tasks of the Bureau.<sup>61</sup> The explanatory note provides no further guidance whatsoever as to the reasons for such a decision.

Furthermore, the state report refers that promoting women's economic empowerment is a top priority for Georgia. In 2023, the percentage of women entrepreneurs in the projects of the grant programme Produce in Georgia, Micro and Small Entrepreneurship Promotion Programme remains high (49.9%). The measures implemented by the state in terms of women's economic empowerment are also welcome. However, women living in rural areas still identify the lack information about existing programmes,<sup>62</sup> as well as the need for women's

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<sup>59</sup> According to survey respondents, women are expected to fulfil gender roles that prioritize family and marriage and take care of others at the expense of their own needs and aspirations. A woman is expected to submit to a man and tolerate him. In contrast, men are expected to be strong, aggressive and dominant, to be the breadwinner and leader of the household. See: National Study on Violence against Women in Georgia 2022, ps. 160-161, <https://shorturl.at/538Is> [30/06/2025]

<sup>60</sup> 17th National Report on the implementation of the European Social Charter submitted by the government of Georgia 31/12/2024 p.21, <https://shorturl.at/3ds1o> [16/06/2025]

<sup>61</sup> See explanatory note, p. 1, <https://shorturl.at/6npps> [26/06/2025]

<sup>62</sup> Informational meetings held by the Public Defender's Office in the villages of Nashamgu, Ghogheti, Khviti, Bozhami, Akhalubani, Tsitsagiantkari and Kvemo Khviti. These meetings have been conducted in 2023-2024.

retraining<sup>63</sup> and employment, as a problem.<sup>64</sup> Furthermore, according to a study published by UN Women,<sup>65</sup> female entrepreneurs cite household duties and access to initial financial resources as the main challenges when starting a business.

Economic participation is particularly problematic for women living in rural areas, displaced women, and those affected by conflict, as evidenced by the meetings held by the Public Defender's Office in 2024. Women repeatedly mentioned the lack of social and economic services, which limits their ability to meet their needs. According to women, in some municipalities, vocational training programs for women lack stability and a long-term nature. Despite numerous recommendations from the Public Defender of Georgia, transportation and access to childcare facilities remain problematic in the region, which hinder women and girls' access to education and employment. As in previous years, this time too, issues related to agriculture and caregiving responsibilities are highlighted, which also hinder women's economic opportunities.

A significant challenge remains the low awareness among men regarding the use of parental leave. As a result, the rate of men utilizing this right remains low. According to the Public Service Bureau's data, in 2024, only one man employed in the Ministry used paid paternity leave. As for other public services, 11 men used paid leave, while one man took unpaid leave.

The share of time spent by women on unpaid care and family activities is high, which amounts to 17.8 percent and is 4.8 times higher than the corresponding indicator of men (3.7%).<sup>66</sup> Women bear a disproportionate burden of unpaid domestic and care work. The unequal distribution of this responsibility, coupled with a lack of accessible care services and entrenched social norms, poses substantial barriers to women's economic empowerment.

Women's economic empowerment is significantly influenced by free movement and its gender aspects.<sup>67</sup> In all regions of Georgia, including the capital, the challenge is the proper functioning of municipal transport and in some cases, even its absence. This problem makes access to education, employment and other basic services even worse, especially for rural

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<sup>63</sup> According to a study carried out by UN Women, only 9% of women entrepreneurs surveyed have been trained in entrepreneurship or small business management. According to the informational meetings held by the Public Defender's Office, the problem of conducting project writing training was identified in the villages of Etserperdi, Koki, Ganmukhuri, Satsikhuri, Abano da Koda, Ghogheti, Khviti, Bozhami, Akhalubani, Tsitsagiantkari, Kvemo Khviti, Koshka and Kardzmani.

<sup>64</sup> In 2023, during an informational meeting held by the Public Defender's Office, it was requested to open a sewing factory or a clay factory in the village of Chale.

<sup>65</sup> See Survey of Female Entrepreneurs in Georgia, p. 8, <https://shorturl.at/59hIe> [26/06/2025]

<sup>66</sup> The Time Use Survey is available at: <https://cutt.ly/G2bdKBn>

<sup>67</sup> Research "Women and Mobility - Gender Aspects of Women's Daily Movement"; Available at: <https://shorturl.at/TEHBx>

women. It hinders the development of appropriate skills and habits for women and their subsequent professional development, which has a direct impact on women's economic independence and, more generally, on the legal status of women in the country. In addition, the mobility of women directly depends on the amount of their income.

It should also be noted that apart from these problems about access to education, the data show sex-based horizontal segregation in vocational and higher education. In fact, women predominantly enrolling in traditionally female-dominated fields of study such as education, health and the arts and being less represented in STEM (Science, Technology, Engineering, Mathematics) and other male-dominated sectors that generally offer higher earnings.<sup>68</sup>

In addition, economic participation is particularly problematic for rural, disabled, displaced and conflict-affected women. This is confirmed by the research conducted by the Public Defender, according to which the majority of them, both on working and non-working days, travel only in connection with work and care at home. The data is alarming, according to which the mobility of women to get an education is extremely low in all regions.<sup>69</sup>

It is noteworthy that there are almost no separate campaigns for gender equality and women's empowerment.<sup>70</sup> These themes are more likely a sub-activity of campaigns about gender-based violence in general and the focus is still on issues of GBV.

**b) Please provide information on:**

- **measures designed to promote an effective parity in the representation of women and men in decision-making positions in both the public and private sectors;**
- **the implementation of those measures;**
- **progress achieved in terms of ensuring effective parity in the representation of women and men in decision-making positions in both the public and private sectors.**

It is noteworthy that, as a result of the introduction of mandatory gender quotas in 2021, the representation of women in municipality representative bodies Sakrebulo across Georgia increased by 11% compared to 2017, reaching 24.5%. Despite the increase in numbers, women are still underrepresented in representative bodies. Against this backdrop, the Public Defender of Georgia has assessed the abolition of the temporary mechanism for the political

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<sup>68</sup> Gender Equality Profile- Georgia 2023, p. 11 <https://shorturl.at/zWGOq> [30/06/2025]

<sup>69</sup> Out of 47 objects included in the research, IDP women living in only two settlements (Tserovani and Zemoetseri) named their own education as one of the goals of daily mobility. The Special report is available at: <https://shorturl.at/7StMg>

<sup>70</sup> Annual Parliamentary Report of the Office of Public Defender of Georgia 2024 p. 193 <https://shorturl.at/ZNfQt> [26/06/2025]



empowerment of women on electoral lists (the mandatory quota system) as a step backward in the process of achieving women's equality.<sup>71</sup>

Additionally, following the Public Defender's referral,<sup>72</sup> the OSCE/ODIHR prepared a legal opinion on the organic laws related to the abolition of gender quotas, assessing them negatively and finding them inconsistent with international human rights standards concerning the elimination of discrimination against women in political and public life.<sup>73</sup>

The legislative debate surrounding the abolition of gender quotas once again underscored the importance of combating gender-based discrimination and gender stereotypes. The debate was ongoing by vulgar and offensive remarks directed at female Members of Parliament.<sup>74</sup> The Public Defender once again emphasizes that "it is essential for women's voices to be clearly heard in the country's legislative body and other policymaking institutions, so that women's needs and gender equality-promoting measures are firmly placed on the agenda".<sup>75</sup>

According to a study<sup>76</sup> published in 2022, the problem is the absence of an internal party gender policy and a hostile and discriminatory work environment for female politicians. The absence of appropriate mechanisms at the internal party and state levels makes women much more vulnerable. In the majority of municipalities, the absence of internal mechanisms for the prevention of sexual harassment is problematic.<sup>77</sup> Due to the burden of work and care at home, and stereotyped and discriminatory attitudes towards women, it is also problematic for women to be in decision-making positions in some municipalities.<sup>78</sup> Which in most cases is manifested in the employment of women in low-ranking positions and their performance of technical work only.<sup>79</sup>

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<sup>71</sup> 2024 Special Report on the Situation of Equality and Combating and Preventing Discrimination, pp. 13-14 <https://shorturl.at/ZjBPw> [26/06/2025]

<sup>72</sup> Statement of the Public Defender of Georgia of April 23, 2024, available at: <https://bit.ly/4hdbMCr>

<sup>73</sup> "Opinion on Two Organic Laws of Georgia Amending the Election Code and the Law on Political Unions of Citizens in Relation to Gender Quotas," Warsaw, 11 June 2024, Opinion-Nr.: ELE-GEND-GEO/501/2024 [ELD/NS]. See the OSCE/ODIHR legal opinion in English at <https://bit.ly/4jBzPMY>

The relevant draft laws were reviewed by the Parliament of Georgia in an expedited manner over the course of four days and were adopted in their final, third reading on April 4 of this year. Subsequently, on May 15, the Parliament overrode the veto imposed by the President of Georgia.

<sup>74</sup> See the Public Statement of the Public Defender of Georgia of April 3, 2024, available at: <https://shorturl.at/bkX1c>

<sup>75</sup> The Statement of the Public Defender of Georgia of April 2, 2024, available at: <https://shorturl.at/FdiJG> [26/06/2025]

<sup>76</sup> The survey was developed by the National Democratic Institute; is available at: <https://cutt.ly/z2gmNzi>

<sup>77</sup> Research of the Office of the Public Defender of Georgia "Evaluation of Gender Equality Policy of Municipalities" 2023 p. 40, <https://shorturl.at/BGuNs> [26/06/2025]

<sup>78</sup> *ibid.* p.40

<sup>79</sup> *ibid.*



**c) Please provide statistical data on the proportion of women on management boards of the largest publicly listed companies, and on management positions in public institutions**

According to the data of 2023, the number of women public employees at the level of the executive authority is high.<sup>80</sup> However, the number of women employed in decision-making positions in the Ministry of Defence is still low; 16.7% of senior officials are women and 31.9% of rank I-II public employees are women. The percentage of women employed in decision-making positions in the Ministry of Internal Affairs of Georgia is even lower; 9.8% of rank I-II public employees are women and none of the top officials are women.

Women's representation and meaningful participation in peace negotiations is extremely low. In 2024 Women constitute 36 per cent of the participants in the Geneva International Discussions (GID). Among the participants representing the central government in the meetings of the Incident Prevention and Response Mechanism (IPRM), women make up 15 per cent.

As of 2024, the percentage of women in ministerial positions is low, at only 16.67%.<sup>81</sup> However, the total number<sup>82</sup> of female professional public servants employed at the executive level (56.4%) exceeds the number of men. Despite this, the percentage of women employed in decision-making positions remains at 45.7%.<sup>83</sup>

Along with the underrepresentation of women in decision-making positions, women's participation in decision-making processes at the local level remains a significant issue. In some cases, this is linked to a lack of awareness about the right to participate in decision-making processes, as well as a lack of initiatives or programs aimed at increasing women's involvement.

It also should be mentioned that Table 14 of the state's report shows the number of women managers by size of entities and years, but it does not include the statistical information about men managers. So, although the number of women managers has increased over the years, the public cannot count on the proportion of women managers by size.

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<sup>80</sup> The data varies by position. For example, according to letter no. G177 of the Public Service Bureau, dated 12.03.2024, 63.8% of III-IV rank public employees are women and 49.8% of I-II rank public employees are women whereas 40.9% of senior officials are women.

<sup>81</sup> Annual Parliamentary Report of the Office of Public Defender of Georgia 2024 p. 185, <https://shorturl.at/ZNfQt> [26/06/2025]

<sup>82</sup> The total number encompasses ministries, with the exception of the Ministry of Internal Affairs, where only 19.3% of the employees are women. Letter no. G177 of the Public Service Bureau, dated 12.03.2024

<sup>83</sup> Letter № 3227 from the Civil Service Bureau, dated March 24, 2025. The Ministry of Internal Affairs did not provide information to the Bureau on the number of senior officials in terms of gender, and as a result, this data is not included.