

IPPF EN Alternative Report

GREVIO baseline evaluation procedures in respect of the EU

December 2025

Introduction

With this alternative report, IPPF EN seeks to contribute to GREVIO's baseline evaluation of the European Union's implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (the Istanbul Convention).

The report provides selected elements in response to the GREVIO questionnaire on legislative and other measures giving effect to the provisions of the Istanbul Convention, as adapted to the specific competences and responsibilities of the European Union.

IPPF EN aims to highlight key policy, legislative, and implementation achievements and gaps at EU level with regard to the effective and comprehensive implementation of the Istanbul Convention. Particular attention is given to the relationship between the Istanbul Convention and the [EU Directive \(2024/1385\)](#) on combating violence against women and domestic violence, which is intended to operationalise the European Union's obligations under the Istanbul Convention.

This report focuses specifically on the intersections between sexual and gender-based violence and sexual and reproductive health and rights, assessing the extent to which current EU measures adequately address these interconnected areas in line with the standards and objectives of the Istanbul Convention.

About IPPF EN

The International Planned Parenthood Federation – European Network ([IPPF EN](#)) is a regional network of a global federation (IPPF), which champions universal access to sexual and reproductive health and rights (SRHR). IPPF European Network comprises 40 national [members and partners](#) in almost as many countries in Europe and Central Asia.

GREVIO's Questionnaire

II. Integrated policies and data collection (Chapter II of the convention, Articles 7 to 11)

(A) EU policy frameworks on violence against women

The European Union does not have one single, comprehensive overarching policy dedicated exclusively to preventing and combating violence against women. Nevertheless, addressing violence against women constitutes a stated priority within the EU policy agenda and is reflected across a range of EU strategies and policy instruments, including, though not limited to, the following:

- ***Gender Equality Strategy 2020-2025***

Preventing and combating violence against women is one of the three core pillars of the EU [Gender Equality Strategy 2020-2025](#). The Strategy places emphasis on prevention measures,

notably through education of boys and girls from an early age about gender equality and non-violent relationships, with a focus on men, boys and masculinities. Sexual and reproductive health and rights (SRHR) are referenced in the Strategy, albeit in a limited manner, primarily under Section 4 on gender mainstreaming, in the context of addressing gender-specific aspects of health. The Strategy explicitly recognises several forms of gender-based violence, including female genital mutilation, forced abortion and forced sterilisation, early and forced marriage, so-called ‘honour-related violence’ and other harmful practices against women and girls.

A significant implementation gap concerns the European Commission’s **failure to publish the Recommendation on the prevention of harmful practices against women and girls**, which it had committed to deliver under the Strategy. Civil society organisations, including IPPF EN, had actively contributed to the preparatory process through consultation meetings and written submissions – notably calling for the Recommendation to comprehensively address all forms of harmful practices against women and girls in all their diversity and all forms of gynaecological and obstetric violence. Despite sustained advocacy efforts to keep this initiative on the political agenda – including [joint civil society letters](#), letters from Members of the European Parliament, and Written Parliamentary Questions (in [January 2024](#) and [November 2025](#)) – the Recommendation has not been adopted, indicating a lack of political commitment to advance this aspect of the Strategy.

IPPF EN urges the EU to explicitly **recognise, prevent, and effectively combat all violations of sexual and reproductive health and rights and all forms of obstetric and gynaecological violence**, abuse, mistreatment or neglect in healthcare settings, as gender-based violence and grave human rights violations. This notably includes forced and coercive sterilisation, including of transgender persons, as highlighted in the [EU LGBTIQ Equality Strategy 2020–2025](#); intersex genital mutilation, as included in the same Strategy and in the [Council of Europe Recommendation CM/Rec\(2025\)7](#); and violence in obstetric and gynaecological healthcare settings, including mistreatment during, and denial of, abortion care. The denial of abortion care constitutes a form of gender-based violence that can, depending on the circumstances, amount to torture, cruel or inhumane treatment. Should the Recommendation on harmful practices not be adopted, **IPPF EN urges the European Commission to propose and implement alternative measures to prevent and remedy these grave human rights violations.**

On obstetric and gynaecological violence, see notably the Council of Europe Parliamentary Assembly [Report](#), the [European Commission](#) and [European Parliament](#) studies, and IPPF EN [Policy Paper](#).

- **Roadmap for Women’s Rights**

The EU [Roadmap for Women’s Rights](#), together with the annexed [Declaration of principles for a gender-equal society](#), was published on 7 March 2025, ahead of International Women’s Rights Day. The Roadmap was subsequently endorsed by all EU Member States, the European Parliament, and a number of civil society organisations. IPPF EN welcomes the Roadmap as an important political commitment, particularly in the context of growing backlash against women’s rights.

The Declaration is structured around eight key principles, the first of which is freedom from gender-based violence. This principle identifies a range of forms of gender-based violence that the EU and its Member States commit to preventing and combating. Importantly, the Roadmap

also addresses, under other principles, the promotion of comprehensive sexuality education, access to sexual and reproductive health and rights (SRHR), and the provision of respectful, high-quality obstetric and gynaecological care, free from discrimination and harmful practices. IPPF EN calls on the European Commission to recognise that access to abortion care constitutes an integral component of obstetric care; to approach SRHR not only from a public health perspective, but also as a matter of fundamental rights and gender equality; and to address all violations of women's sexual and reproductive health and rights.

See IPPF EN [analysis](#) of the Roadmap.

- ***Gender Equality Strategy 2026-2030***

The current EU Gender Equality Strategy concludes in 2025. The European Commission has announced its intention to adopt a renewed Gender Equality Strategy for the period 2026–2030. According to the Commission, the forthcoming Strategy is expected to operationalise the vision set out in the EU Roadmap for Women's Rights by translating its principles into concrete commitments, actions, and indicators. See IPPF EN [recommendations](#) for the next Gender Equality Strategy.

- ***Victims' Rights Strategy***

The [Victims' Rights Strategy](#) is meant to support the implementation of the Victims' Rights Directive (more in Chapter V). The Strategy includes a specific focus on supporting victims of sexual and gender-based violence. Its effective implementation is therefore relevant to the EU's obligations under the Istanbul Convention.

- ***Exchanges of best practices: Violence Prevention Network & Mutual Learning Programme***

Under the current Gender Equality Strategy, the European Commission established a Violence Prevention Network bringing together representatives of Member States and civil society experts to facilitate the exchange of best practices in preventing violence against women. IPPF EN participated in several meetings of the Network and considers it a positive initiative. However, the outcomes of these exchanges are not binding, which limits their impact on policy and practice at national level.

In addition, the European Commission facilitated the [Mutual Learning Programme in Gender Equality](#) which included [seminars](#) addressing various aspects of ending violence against women and domestic violence, as well as a dedicated seminar on sexual and reproductive health and rights. These initiatives are welcomed, and IPPF EN emphasises the importance of ensuring the continued and meaningful involvement of civil society expertise in future mutual learning activities.

(C) Engagement with civil society

1.1 Civil society consultation and participation

Article 11 TEU explicitly requires the EU institutions to give citizens and representative associations, by appropriate means, the opportunity to make known and publicly exchange their views in all areas of Union action. Although in practice, progress should be made towards a genuine civil dialogue.

The European Commission consults civil society organisations in the development of policies related to gender equality. For example, the European Commission organised a consultation meeting on the EU Roadmap for Women's Rights, to which a selected number of civil society organisations, including IPPF EN, were invited. In addition, the Commission conducted an online public consultation and convened a targeted consultation meeting in the context of the preparation of the next Gender Equality Strategy, to which IPPF EN provided written and oral contributions.

The European Institute for Gender Equality (EIGE) also engages with civil society organisations through meetings and exchanges on gender equality-related issues, and organises the Gender Equality Forum every other year, which constitutes a valuable forum for dialogue and knowledge-sharing.

While civil society organisations are regularly invited to share their expertise, greater transparency would be beneficial with regard to **how their inputs are reflected** in final policy outcomes. In addition, ensuring the effective implementation of the Istanbul Convention requires the meaningful involvement of a **diverse range of civil society actors, reflecting an intersectional approach**.

- ***Advisory Committee on equal opportunities for women and men***

The EU has established structures such as the [High-level group on gender mainstreaming and Advisory committee on equal opportunities for women and men](#). The mandate of the Advisory Committee includes 'facilitating ongoing exchanges of relevant experience, policies and practices between EU countries, and NGOs'. In practice, the work of the Advisory Committee has benefitted from the participation of the European Women's Lobby, whose longstanding expertise is widely recognised. At the same time, broadening participation to include additional civil society organisations working on gender equality issues would further enhance the diversity of perspectives and expertise available to the Committee, in line with the objectives of inclusive and participatory policy-making.

- ***Implementation of the Istanbul Convention by the European Union***

The European Commission has organised meetings with civil society organisations in the context of the GREVIO baseline evaluation of the European Union's implementation of the Istanbul Convention. These meetings have provided useful information on the process and on the ways in which civil society may contribute.

- ***Implementation of the EU Directive 2024/1385 on combating violence against women and domestic violence***

Member States are required to transpose and implement the Directive by June 2027. In order to support the transposition process and promote a consistent and harmonised interpretation of the Directive's provisions, the European Commission has initiated a series of workshops for Member States.

Civil society organisations, including IPPF EN, have expressed their willingness to support the European Commission's efforts, notably by offering to contribute expertise, participate in the workshops, and provide written guidance and analysis. Civil society involvement is however not guaranteed so far. Ensuring the meaningful involvement of civil society in these workshops would

be instrumental in strengthening implementation, drawing on specialised expertise, and promoting compliance with the standards of the Istanbul Convention.

1.2. Civil society funding

The European Commission provides financial support to civil society organisations, notably through the Citizens, Equality, Rights and Values (CERV) Programme. Within this framework, the strand on ‘Equality, Rights and Gender Equality’ and the ‘Daphne’ strand on combating gender-based violence are particularly relevant for civil society organisations working on gender equality, women’s rights, and the prevention and combating of gender-based violence. The Programme provides both action grants for project-based activities and operating grants that contribute to core funding. It also allows for cascading grants, through Financial Support to Third Parties, which can enhance access to funding for smaller and grassroots organisations. According to the European Commission’s [interim evaluation](#), the CERV Programme has been assessed as effective in achieving its objectives. At the same time, the evaluation notes that the Equality and Daphne strands are the [most underfunded](#) components of the Programme. In this context, it will be critical to ensure the **continuation and strengthening of financial support for civil society organisations working on gender equality, women’s rights, SRHR and combating SGBV through the CERV+ strand** of the proposed AgoraEU programme under the next Multiannual Financial Framework 2028–2034, including to support the effective implementation of the Istanbul Convention. See IPPF EN and partners’ joint [reaction](#) to the Commission’s proposal.

2. Measures taken to ensure that effective co-operation with civil society

The European Commission published the first ever [Civil Society Strategy](#) on 12 November 2025. While the Strategy constitutes a welcome political signal of the EU’s commitment to protect, engage with, and support civil society, it **does not sufficiently integrate a gender perspective and falls short of proposing concrete actions** to effectively safeguard and strengthen civic space across the European Union. See IPPF EN and partners’ joint [contribution](#) and [reaction](#) to the Strategy.

Concerning developments affecting civic space can be observed across the EU, both at national level. Civil society organisations and human rights defenders working on gender equality, women’s rights, sexual and reproductive health and rights (SRHR), and LGBTI rights are amongst those [particularly exposed to threats and attacks](#), smear campaigns, and funding cuts.

Negative trends can also increasingly be observed at EU level over the past eighteen months. Recent discussions and initiatives **at EU level**, coming from certain political Groups in the European Parliament and anti-rights actors, including negative public narratives and disinformation related to the receipt of EU funding by civil society organisations and the legitimacy of their **advocacy** activities, have raised concerns within civil society. In this context, the internal [Guidance Note](#) circulated by the European Commission – unfortunately referenced in the Civil Society Strategy – lacks clarity and may be detrimental to the role and legitimacy of civil society advocacy within EU policy-making processes.

In light of the EU’s obligations under the Istanbul Convention, it is essential that the European Union continues to recognise, support, and engage constructively with civil society organisations. Meaningful collaboration with independent civil society – particularly organisations with expertise in preventing and combating gender-based violence and in

promoting gender equality, women's rights, SRHR, and LGBTI people's rights – is a cornerstone of a healthy democratic system and a prerequisite for the effective implementation of the Convention.

III. Prevention (Chapter III of the convention, Articles 12 to 17)

A&B. The EU Directive 2024/1385 on combating violence against women and domestic violence contains a dedicated Chapter 5 on prevention. Article 35 is consistent with, and provides greater specificity on some aspects than Article 14 of the Istanbul Convention on 'Education'.

Article 35 provides that Member States shall take specific measures to prevent rape and to promote the central role of consent in sexual relationships. Such measures include 'awareness-raising campaigns or programmes, the making available and distribution of consent education material and the wide dissemination of information on measures of rape prevention', 'where appropriate, in cooperation with civil society and non-governmental organisations'. These measures shall aim to 'promote changes in behavioural patterns rooted in the historically unequal power relations between women and men or based on stereotyped roles for women and men, in particular in the context of sexual relationships', 'address, in particular, the central role of consent in sexual relationships', 'promote the understanding that consent must be given voluntarily as a result of a person's free will, mutual respect, and the right to sexual integrity and bodily autonomy', and 'increase knowledge of the fact that non-consensual sex is considered a criminal offence'.

Recital 74 specifically mentions 'strengthening sexuality education' 'in formal education' as one of the preventive measures needed to counter sexual and gender-based violence, as well as the need for targeted measures to reach specific groups at a heightened risk of violence, including children, lesbian, gay, bisexual, trans or intersex persons, and persons with disabilities. Article 35 shall be interpreted in light of Recital 74, meaning that as part of the measures Member States shall take to prevent rape and promote consent, they shall strengthen the provision of sexuality education including in formal education to prevent sexual and gender-based violence.

[Research](#) on the Status of sexuality education in 25 countries in Europe and Central Asia shows that comprehensive sexuality education is far from accessible in all EU Member States. IPPF EN urges Member States to implement the highest existing standards in the field of **comprehensive sexuality education**, as this constitutes the most effective and evidence-based framework for preventing sexual and gender-based violence and for fulfilling the preventive obligations set out in the Istanbul Convention. IPPF EN produced a Briefing on the implementation of the Directive with a focus on comprehensive sexuality and consent education.

IV. Protection and support (Chapter IV of the convention, Articles 18 to 28)

D&G. The EU Directive 2024/1385 on combating violence against women and domestic violence includes a dedicated Chapter 4 on Support services. Article 26 of the Directive on 'Specialist support for victims of sexual violence' is consistent with, and provides greater specificity on some aspects than Article 25 of the Istanbul Convention on 'Support for victims of sexual violence'.

Article 26 of the Directive establishes clear legal obligations for Member States to ensure the provision of specialist support services for victims of sexual violence. Article 26.1 provides that “Member States shall provide for appropriately equipped and easily accessible rape crisis or sexual violence referral centres, which may form part of the national healthcare system, to ensure effective support to victims of sexual violence and to ensure the clinical management of rape”. Article 26.2 specifies that: “Member States shall provide for victims of sexual violence to have timely access to healthcare services, **including sexual and reproductive healthcare services**, in accordance with national law”.

These obligations must be read in conjunction with **Article 25** of the Directive on ‘Specialist support for victims’, which sets out minimum standards for the availability and accessibility of services. In particular, such services must be appropriately equipped and easily accessible at all times, every day of the week, remain fully operational in times of crisis, be available free of charge, and ensure adequate geographical distribution across the territory. Member States are also required to provide sufficient human and financial resources and capacity, including adequate funding for non-governmental organisations that deliver specialist support services.

IPPF EN urges all Member States to **ensure effective access to sexual and reproductive healthcare services for victims of sexual violence**. Such services should be provided in line with the World Health Organization guidelines on the clinical management of rape. To be genuinely accessible to victims, these services must be readily available to the general population at all times, recognising the time-sensitive nature of post-rape care. Access to care should not be conditional on victims having to prove that they have experienced sexual violence.

The [agreement](#) reached on 10 December between the European Parliament and the Council of the EU on the revision of the **Victims’ Rights Directive** reinforces these protections by explicitly reaffirming that survivors of sexual violence must have access to sexual and reproductive healthcare services. For the first time in EU legislation, a recital specifies the types of services that should be made available, in accordance with national law, including emergency contraception, post-exposure prophylaxis treatment, testing for sexually transmitted infections, and access to abortion care. IPPF EN [welcomed](#) this agreement as an important step towards strengthening victim-centred and rights-based support for survivors of sexual violence at EU level.

V. Substantive law (Chapter V of the convention, Articles 29 to 48)

A. Information on the EU legal framework

Limitations in EU competence on criminal law

The EU’s legislative competence in criminal matters is limited to the offences listed under Article 83(1) TFEU, the so-called ‘Eurocrimes’. Currently, this list only includes the ‘sexual exploitation of women and children’ as a relevant legal basis to legislate on violence against women. While the European Parliament had called for the inclusion of gender-based violence as a Eurocrime (in a 2021 [Resolution](#) and in its 2023 [Proposals to amend the Treaties](#)), the European Commission and Council of the EU have not acted on this recommendation to date. The European Commission had committed in the Gender Equality Strategy 2020-2025 to propose adding at least specific forms of gender-based violence to Article 83(1), but its proposal to add hate speech and hate crimes has remained blocked. In practice, this limitation has been used as an argument, notably by some Member States, to constrain the EU’s capacity to legislate on sexual and gender-based violence.

A&F. Gaps in EU legislation

The EU Directive 2024/1385 on combating violence against women and domestic, intended as the EU's principal instrument for the implementation of the Istanbul Convention, remains incomplete, as it only criminalises certain forms of violence: **female genital mutilation, forced marriage, and online forms of gender-based violence.**

See IPPF EN initial [recommendations](#) for the Directive, after the European Commission's proposal was published. See a joint civil society [statement](#) with recommendations during the negotiations. See a joint civil society [reaction](#) to the Directive on violence against women, which analyses the final text after adoption.

In particular:

- **Sexual violence:** The Directive does not criminalise sexual violence, including rape, using a consent-based definition aligned with Article 36 of the Istanbul Convention. While both the European Commission and European Parliament supported such a definition, and their legal services had confirmed the EU's competence on this matter, the Council of the EU rejected it, due to opposition from certain Member States. It may be interesting to note that France, who was opposing the proposed Article 5, recently amended its national legislation to adopt a consent-based definition of rape.
There remains a potential avenue to adopt a consent-based definition of sexual violence at EU level for minors above the age of consent through the ongoing revision of the **Directive on combating Child Sexual Abuse.**
- **Forced sterilisation:** The Directive fails to criminalise forced sterilisation, a practice explicitly prohibited under the Istanbul Convention. IPPF EN and partner organisations had called for the inclusion of this offence in the Directive, but the EU has yet to act. Forced sterilisation disproportionately affects Roma and racialized women, transgender, and intersex persons, and women with disabilities, and constitutes a form of obstetric and gynaecological violence and a grave human rights violation.
- **Other harmful practices:** As explained above, IPPF EN urges the EU to explicitly **recognise, prevent, and effectively combat all violations of sexual and reproductive health and rights and all forms of obstetric and gynaecological violence**, abuse, mistreatment or neglect in healthcare settings, as gender-based violence and grave human rights violations. This notably includes forced and coercive sterilisation, including of transgender persons, as highlighted in the [EU LGBTIQ Equality Strategy 2020–2025](#); intersex genital mutilation, as included in the same Strategy and in the [Council of Europe Recommendation CM/Rec\(2025\)7](#); and violence in obstetric and gynaecological healthcare settings, including mistreatment during, and denial of, abortion care. The denial of abortion care constitutes a form of gender-based violence that can, depending on the circumstances, amount to torture, cruel or inhumane treatment. Should the Recommendation on harmful practices not be adopted, **IPPF EN urges the European Commission to propose and implement alternative measures to prevent and remedy these grave human rights violations.**

Positive developments

Despite these gaps, the Directive includes certain provisions that reinforce obligations under the Istanbul Convention. As described above in Sections III. and IV.:

- Linked to Article 14 of the Istanbul Convention, Article 35, in conjunction with Recital 74, establishes requirements for **comprehensive sexuality education**. The [European Parliament](#) further supports including sexuality education as a prevention measure during ongoing negotiations on the revision of the **Directive on combating Child Sexual Abuse**.
- Linked to Article 25 of the Istanbul Convention, Article 26 of the Directive obliges Member States to provide **sexual and reproductive healthcare services for victims of sexual violence** in accordance with national law, a requirement reaffirmed in the revised **Victims' Rights Directive**. Negotiations on the revision of the **Directive on combating Child Sexual Abuse** similarly indicate support from [Parliament](#) for the provision of sexual and reproductive healthcare to child victims.

B. Implementation of the EU Directive 2024/1385 on combating violence against women and domestic violence

Member States are required to transpose and implement the Directive by June 2027. In order to support the transposition process and promote a consistent and harmonised interpretation of the Directive's provisions, the European Commission has initiated a series of workshops for Member States.

The European Commission is meant to provide guidance to Member States on how to interpret and implement the Directive's provisions. In this context, IPPF EN is notably [calling](#) on the European Commission to: Issue a Recommendation and provide guidance to Member States on the provision of sexual and reproductive healthcare services to victims of sexual violence, in line with international standards (WHO Standards on clinical management of rape, WHO Abortion Care Guideline); and Issue a Recommendation and provide guidance to Member States on the provision of comprehensive sexuality education, in line with international standards (UNESCO Technical Guidance).

Civil society organisations, including IPPF EN, have expressed their willingness to support the European Commission's efforts, notably by offering to contribute expertise, participate in the workshops, and provide written guidance and analysis. Civil society involvement is not guaranteed so far. Ensuring the meaningful involvement of civil society in these workshops would be instrumental in strengthening implementation, drawing on specialised expertise, and promoting compliance with the standards of the Istanbul Convention.

VII. Asylum and migration

E. EU legislation **fails to adequately protect undocumented victims of violence**, leaving them at risk of detention and deportation, therefore deterring them from reporting crimes and depriving them from access to support and justice. Neither the EU Directive on violence against women nor the revised Victims' Rights Directive include safeguards, such as guarantees that no personal data of undocumented migrant victims would be shared between police and immigration

enforcement officials (e.g. [‘firewalls’](#)), or the issuance of special residence permits for undocumented victims. In practice, this means there is no EU-wide guarantee of safe reporting mechanisms, despite clear joint civil society [calls](#) for such measures. See for instance the joint civil society [reaction](#) to the Directive on violence against women after adoption, which notably highlights this gap, and PICUM and La Strada International’s [statement](#) on the revised Victims’ Rights Directive.