

AUTOMATIC TRANSLATION

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General commentary on the report and Poland's implementation of the Istanbul Convention.

Ladies and Gentlemen,

Due to the very limited staffing resources currently available to the Autonomia Foundation and the Juniper Foundation (this response is submitted on behalf of both organizations), we are pleased to provide a brief analysis. We remain at your disposal for any additional questions.

First, the government's report covers only the period after December 2023 – and what happened while the United Right was in power has enormous implications for the reality we live in. This also applies to combating violence against women and domestic violence.

We are dealing with a devastated rule of law, justice system, victim support system, and work with perpetrators – the way these activities are implemented contradicts the values, foundations, and provisions of the Istanbul Convention (e.g., the absolute ignoring of the roots of violence, avoiding addressing violence against women and other gender-based violence, implementing activities that reinforce stereotypes about gender and violence, etc.). Unfortunately, the staff of many institutions and facilities would need to undergo thorough training. Standards should be established in this regard. Quantitative indicators, such as the number of female police officers, are not sufficient. Training programs must be adapted to the requirements of the Istanbul Convention, taking into account gender dimension, intersectional perspectives, and other forms of violence against women and other gender-based violence, beyond domestic violence.

It should be noted that currently, some public institutions and administrative departments employ very committed and professional people, but the government as such marginalizes activities related to equality, counteracting discrimination and counteracting violence (a good example is the history of the “Minister for Equality” and the history of the Department that is supposed to deal with counteracting violence (which is mentioned in the report prepared by the government - point 1.1)).

It remains unclear to the public and organizations what structural changes have occurred since October 2023. Which department or ministry is responsible for combating violence? Communication about what's happening in the area of combating violence is very poor. This resulted, among other things, in an uproar during the Women's Congress in 2025 and a call for the government to prepare a report for GREVIO.

There is a lack – as rightly noted in the report – of programmes, policies and actions that would adequately address issues of violence against women other than family/domestic violence – sexual violence, new technologies facilitated violence, economic violence, etc. There is a lack of actions that would address violence against women, girls and other gender- based violence that occurs in educational institutions, work places etc.

Perhaps, as the report/information states, work is underway on programs to counteract violence and discrimination, including those related to supporting women with disabilities, refugee women, elderly women, etc., but at present, comprehensive programs are lacking. Offering support to refugee women is almost exclusively the responsibility of non-governmental organizations.

A significant problem is that existing public programs, implemented either by public institutions themselves or by organizations (as commissioned by public authorities) targeting schools, seniors, people with disabilities, etc., ignore gender and other intersecting identity categories. This is the result of eight years of governments that actively eliminated this perspective, punished those who considered it, or threatened disciplinary consequences for those who engaged in gender issues or counteracted homophobia.

There is a lack of specialized support services for women victims of violence. Publicly funded centers, so-called SOWs, are " *gender blind* ."

Although in fact – as we read in the report/information of the Polish government – the Minister for Equality launched a government grant program worth PLN 3,000,000, which provides additional funds for local governments to combat domestic and gender-based violence, the too short time for developing and implementing projects and the lack of the required cooperation with expert organizations may negatively impact the quality of implemented activities and the effectiveness of spending funds.

Regarding the public administration structures responsible for counteracting violence, both at the central and provincial levels, they are very weak, underfunded, and lack competent staff. In the case of the Małopolska Voivodeship, not a single meeting of the Provincial Team for Counteracting Domestic Violence, established in June 2024, has likely been held. The information on available shelter places for victims of domestic violence in the Małopolska Voivodeship (as of October 31 , 2025) illustrates how the system works – almost all facilities are 100% vacant!!!:

<https://malopolska.uw.gov.pl/doc/BIP%20Wykaz%20wolnych%20miejsc%20schronienia%20-%20pa%C5%BAdziernik%202025%20r.doc>

HEALTH EDUCATION

It's worth noting that the Ministry of National Education, in collaboration with experts, has developed a health education program that includes elements of education on sexual violence, consent, and building healthy relationships. Unfortunately, despite plans to make health education a mandatory subject, under pressure from the Catholic Church in Poland, health education has been deemed optional. Furthermore, far-right, conservative, Catholic organizations (led by Ordo Iuris) have conducted a massive disinformation campaign against this education under the slogan "Stop the sexualization of children," which has led many parents to withdraw their children from classes, and in some regions of Poland, the subject is not taught at all.

FINANCING THE PREVENTION AND COUNTERACTING OF VIOLENCE AGAINST WOMEN, OTHER GENDER-BASED VIOLENCE AND DOMESTIC VIOLENCE

Financial resources – the report provides information on funds from the FIO and the Justice Fund allocated to the implementation of anti-violence activities.

It is worth mentioning that the so-called Justice Fund (coordinated by the Ministry of Justice, headed by Zbigniew Ziobro of the Sovereign Poland/United Right) is the subject of one of the largest corruption investigations in the history. It concerns irregularities in the management of the fund between 2015 and 2023. The fund was intended to aid crime victims, but according to the prosecutor's office, it was used for political and private purposes. The charges include, among others, improper allocation of subsidies – funds were transferred to organizations linked to politicians or without following the required procedures; financial embezzlement – losses to the State Treasury estimated at over PLN 100 million; money laundering and document falsification; and spending funds for political purposes, including election campaigns. Dozens of individuals have been charged with a total of over 50 crimes. A European Arrest Warrant has been issued for former Deputy Minister of Justice Marcin Romanowski, who was granted political asylum in Hungary. The Sejm waived the immunity of several MPs, including Michał Woś, and Dariusz Matecki waived it herself just before the Sejm vote. Zbigniew Ziobro, the former Minister of Justice, is also currently hiding from the Polish justice system in Hungary.

Intentionally, activities related to counteracting violence against women in line with the spirit and letter of the Istanbul Convention were not financed.

PREVENTION

During the PiS government (just before the transfer of power), the Polish government adopted a prevention program that is contrary to the provisions of the Istanbul Convention.

From 2020 to 2024, the project "Integrated system for preventing domestic violence" was implemented in Poland. It was a pre-defined project carried out by the Institute of Justice (a research unit of the Ministry of Justice) under the "Justice" Programme financed by the Norwegian Financial Mechanism 2014-2021. The head of the IWS was Prof. Marcin Wielec (appointed in 2019 by the Minister of Justice Zbigniew Ziobro, and dismissed on June 24, 2024 by the new Minister of Justice Adam Bodnar (former Commissioner for Human Rights). Marcin Wielec was awarded the Knight's Cross of the Hungarian Order of Merit in 2024. The project coordinator was Dr. Bartłomiej Oręziak (Cardinal Wyszyński University). Although the document uses the word "prevention" in "all cases" and emphasizes that "the best way to solve the phenomenon of domestic violence is prevention, not just reacting to the effects of violence", a careful analysis of the document shows that these are only empty words and "the cat has been turned upside down".

The project's goal was to "create a violence prevention model, test it, and then implement and implement it in practice." The project resulted in, among other things, the development of a guide for local government units on counteracting domestic violence and a set of court documents. A monograph, "Selected Legal Aspects of Counteracting Domestic Violence," was published, devoted to counteracting domestic violence from a legislative perspective. "The aim of the scientific monograph is to analyze selected legal aspects of an integrated system for counteracting domestic violence, along with the current state of case law and the

position of legal scholars." The project was tested in 14 selected municipalities across Poland. These included small rural municipalities, rural-urban municipalities, and the large city of Krakow.

"Integrated Model of Domestic Violence Prevention" was also created, which, although it declares compliance with the postulates of the Istanbul Convention, is quite the opposite. At the word level, we can even read: "The integrated model for the prevention of domestic violence is consistent with the actions indicated in the Istanbul Convention, which concern preventive measures and the integration of services to counteract violence against women and domestic violence. The processes presented in the model are based primarily on research findings (...). The main principles of the model are: (...) promoting equality between women and men and counteracting discrimination; opposing violence against any person, especially women..." **However, an analysis of the document and the conference programs accompanying the project and other available documents clearly indicates that they contradict the provisions of the Istanbul Convention and GREVIO recommendations.** The document does not mention the words "gender" or "women" at all – five times, including three times when the phrase "equality between women and men" appears – this has no significance to the document as a whole. The document also includes a glossary of terms, which includes a definition of domestic violence prevention and a definition of domestic violence – neither of which contains a single word about gender-based violence, violence against women, or the gender dimension of violence.

Although this does not apply to the reporting period, it is worth noting that violence prevention was a priority in the competition announced by the current "Minister for Equality", mentioned in the report. However, the violence prevention system lacks knowledge and competencies related to VAGW and GBV prevention. Systemic training in this area is necessary.

However, examples of primary prevention initiatives that would deserve greater support and involvement of public entities are, for example:

Between 2016 and 2024, the Autonomia Foundation implemented further training for WenDo trainers —methods of self-determination, self-defense, and assertiveness for women* and girls. In total, Autonomia has trained approximately 80 trainers, primarily based in Poland and Ukraine. Among them are women from the LBT community, trans people, and people with migration, refugee, and disability experiences. Thanks to Autonomia and the trainers trained by the foundation, dozens of WenDo workshops —feminist self-defense—were held in Poland and Ukraine in 2024 alone, with over 2,000 women and girls, including those living with disabilities or migrant experience, participating.

The "Stand Up – Stand Up to Harassment in Public Places" campaign aimed to raise public awareness of sexual harassment in public spaces and equip participants with practical tools for responding to such situations. The project was implemented in collaboration with L'Oréal Paris and the Right To Be organization, as well as the Women's Rights Center and the Feminoteka Foundation. Its central element was free training in the 5D methodology: *Deconcentrate, Involve Others, Speak Up, Document, and Support*. The campaign was global in scope, aiming to train 1 million people worldwide. Training in Poland reached several thousand people, conducted both online and in-person – including in schools, universities, companies, and at public events. The campaign was held under the honorary

patronage of the Commissioner for Human Rights and the mayors of Poland's largest cities (Warsaw, Krakow, Gdańsk, Wrocław, Poznań, and Łódź). Although the exact number of people trained in Poland was not publicly disclosed, the campaign was nationwide and widely promoted in the media and in public spaces.

In 2024, the Juniper Foundation, in partnership with Plan International Poland, implemented the first large-scale project on the safety of girls and young women in cities. The project was under the patronage of the Ministry of Equality and the City of Krakow. Research was conducted (including research walks), a number of workshops on safety were held, and a *Girls Advisory Group was established*. Group – G AG), which served as an expert and educational group, conducting self-advocacy and peer-to-peer activities, including on social media; recommendations were developed for public institutions and decision-making bodies regarding the prevention of violence against girls in urban spaces. On International Day of the Girl (October 11, 2024), a conference entitled "*Safer Cities – Solutions and Recommendations for Institutions and Communities*" was organized, bringing together representatives of public administration, education, culture, and social organizations. The project promoted an intersectional approach to urban policies, including the need to consider diverse experiences – including those of LGBTQ+ people, migrants, and women with disabilities – in planning public spaces and creating anti-violence policies.

COOPERATION WITH NON-GOVERNMENTAL ORGANIZATIONS

Although after October 2023, when the democratic opposition won the parliamentary elections, the atmosphere around civil society organizations and activities concerning gender equality and counteracting discrimination and gender-based violence (including against women) has improved significantly, the mere absence of a "smear campaign" is not enough.

Our experience shows that the current administration is eager to support the organization's activities, for example, by granting free patronage. They are willing to meet with others, but these are incidental and random.

There is a lack of permanent, clear, and collaborative partnerships. There is a lack of systematic, sustainable funding for the activities of expert organizations working in the area of violence against women and other gender-based violence.

organizations working to combat violence are struggling to survive following the withdrawal of US funding and humanitarian aid related to the presence of Ukrainian refugees. For example, the Autonomia Foundation is currently operating without any staff, relying solely on volunteer work. This spring, it was forced to relinquish its premises, which it had been renting from Krakow City Hall since 2019. The Autonomia Foundation renovated the premises itself and adapted them to the needs of wheelchair users. However, it could not afford the constantly rising rent. Another organization, the Women's Rights Center in Krakow, was forced to close its shelter for women victims of violence this year. Due to a lack of funding, there is a risk that the entire Krakow branch of the Women's Rights Center will close by early 2026.

There is a lack of promotion of cooperation between public institutions responsible for counteracting violence and civil society organizations – for example, by requiring such cooperation in projects co-financed from central funds or awarding it additional points. At the same time, public institutions have limited resources and attempt to "push" the

implementation of tasks onto non-governmental organizations – drawing on the expertise of expert organizations (the Women's Rights Center) but failing to consult on grant applications. I know of a situation where, after receiving funding from central funds, the municipal applicant institution delegated these tasks to organizations without adequate preparation. This leads to sham actions, a loss of public funds, and a missed opportunity for effective action aimed at victims.

CALL:

We appreciate the efforts of a handful of individuals within public administration who are committed to combating violence. However, the overall process still requires significant action and time.

Referring to the obligations arising from the Convention on Preventing and Combating Violence against Women and Domestic Violence, we call on institutions and bodies at all levels: municipal, provincial, central, responsible for laws, policies and programs in the areas of education, home affairs, social policy and health to:

- Establish legislation, policies, and investments in the prevention of violence against women, other gender-based violence, and domestic violence. It is essential to develop long-term, gender-sensitive, violence against women and domestic violence prevention programs based on standards, research, and legislation, addressing the roots and causes of violence, and integrating them into the education, health, and social services sectors. These programs must be adequately funded, with budgets that allow for the achievement of goals.
- These policies and programs must comprehensively implement those strategies that have been identified as key and are required by law, including: education for equality and non-discrimination and promoting the building of relationships based on respect and consent from an early age and at all levels of education, in order to change beliefs and attitudes that lead to tolerance of violence; empowerment – implementing programs and activities for the empowerment, self-determination, and independence of women; implementing programs targeted at men and boys that challenge violent patterns of masculinity and engage them in active participation in violence prevention; conducting campaigns targeted at the general public to improve skills in recognizing gender-based violence and teaching how to respond to it; conducting training for people in the education, health, and decision-making sectors; and involving sports clubs, media, cultural institutions, non-governmental organizations, and the private sector in prevention.
- Expanding comprehensive, accessible and high-quality services for survivors of violence – prevention cannot come at the expense of protecting victims.
- Increase support and resources for independent girl- and women-led organizations and women's rights organizations so they can play their leading role in ending violence against women and girls.

We hope that the information presented will be useful in formulating your comments.

With respect,

On behalf of the Autonomia Foundation and the Juniper Foundation

Agata Teutsch