

Ombudsperson Institutions and National Human Rights Institutions: Implementation of Committee of Ministers Recommendations and Other International Standards

Les Institutions de l'Ombudsman et les Institutions nationales des droits humains : Mise en œuvre des Recommandations du Comité des Ministres et autres normes internationales



Proceedings of the Workshop
Strasbourg, 25 November 2025

Actes de l'Atelier
Strasbourg, 25 novembre 2025

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PROGRAMME

Tuesday 25 November 2025		Mardi 25 novembre 2025
Opening of the Conference • Krista OINONEN Chairperson of the Steering Committee for Human Rights (CDDH) • Clare OVEY Director of Human Rights, Council of Europe	09:30	Ouverture de la Conférence • Krista OINONEN Présidente du Comité directeur pour les droits humains (CDDH) • Clare OVEY Directrice des droits humains, Conseil de l'Europe
Keynote speech • Michael O'FLAHERTY Council of Europe Commissioner for Human Rights	09:45	Discours liminaire • Michael O'FLAHERTY Commissaire aux droits de l'homme du Conseil de l'Europe
PANEL 1 Ombudsperson institutions • Marta HIRSCH-ZIEMBINSKA Office of the European Ombudsman • Delphine FREYMANN Deputy Secretary, European Commission for Democracy through Law (Venice Commission)	10:05	SESSION 1 Les institutions de l'Ombudsman • Marta HIRSCH-ZIEMBINSKA Bureau du Médiateur européen • Delphine FREYMANN Secrétaire Adjointe, Commission européenne pour la démocratie par le droit (Commission de Venise)
<i>Discussion</i> COFFEE BREAK	11:00	<i>Discussion</i> PAUSE CAFÉ
PANEL 2 National Human Rights Institutions • Beate RUDOLF German Institute for Human Rights, Member of the Board of the European Network of National Human Rights Institutions (ENNHRI)	11:15	SESSION 2 Institutions nationales des droits humains • Beate RUDOLF Institut allemand des droits humains, Membre du Bureau du Réseau européen des Institutions nationales des droits de l'Homme (ENNHRI)

• Tamar GVARAMADZE First Deputy Public Defender of Georgia, Global Alliance of National Human Rights Institutions (GANHRI) • Vladlen STEFANOV Chief, National Institutions and Regional Mechanisms Section, Global Operations Division, Office of the United Nations High Commissioner for Human Rights (OHCHR) CLOSING REMARKS • Krista OINONEN Chairperson of the Steering Committee for Human Rights (CDDH)	12:20	• Tamar GVARAMADZE Première Adjointe au Défenseur public de Géorgie, Alliance mondiale des Institutions nationales des droits de l'Homme (GANHRI) • Vladlen STEFANOV Chef de la Section des institutions nationales et des mécanismes régionaux, Division des opérations mondiales, Haut-Commissariat des Nations unies aux droits de l'homme (OHCHR) ALLOCUTION DE CLÔTURE • Krista OINONEN Présidente du Comité directeur pour les droits humains (CDDH)
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OPENING SESSION / SESSION D'OUVERTURE

Krista OINONEN

Chairperson of the Steering Committee for Human Rights / *Présidente du Comité directeur pour les droits humains* (CDDH)

Dear colleagues, and all participants in Strasbourg and across Europe joining us via livestream,

It is my pleasure to open this workshop on Ombudsperson Institutions and National Human Rights Institutions: Implementation of Committee of Ministers Recommendations and Other International Standards.

Today's task is significant: to look at how two excellent Committee of Ministers Recommendations are being implemented, and to chart how they can better serve Europe's evolving needs.

1. The Ombudsperson Recommendation – in essence

The 2019 Recommendation on the Ombudsperson institution highlights how Ombudspersons have evolved far beyond resolving mal administration; they have become trusted democratic intermediaries.

Their strength lies in a unique combination:

- They are approachable.
- They are independent and impartial, with the authority to investigate, question, and recommend change.
- And they help ensure that the State remains responsive and accountable.

The Recommendation stresses the importance of a solid legal foundation, transparent appointments, free access to information, and protecting Ombudspersons from pressure or reprisals.

What is most interesting is that Ombudspersons operate at the point where trust in institutions is either built or lost. Their work gives the State a human face. When an Ombudsperson functions well, individuals are reminded that public power can be questioned and corrected without conflict.

2. The NHRI Recommendation – in essence

The 2021 Recommendation on National Human Rights Institutions frames NHRIs as essential components of the State's human rights architecture, entrusted with ensuring that principles are upheld in practice and over time.

Its message is straightforward:

- NHRIs must have independence, pluralism, and sufficient resources;
- They should operate under a broad human rights mandate grounded in the Paris Principles;
- And they need the space and security to work without intimidation or interference.

But beyond these essentials, the Recommendation underscores something less often said: NHRIs are connectors. They bridge people's lived experiences with the institutional machinery of the State. They reveal blind spots. They translate individual grievances into systemic reform. In times when Europe faces deep social fragmentation, this bridging function is invaluable.

3. Why these Recommendations matter now

Both Recommendations speak to a shared insight: the protection of rights and the accountability of public authority require institutions that are independent, principled and accessible. This is where NHRIs and Ombudsmen play an essential and active role.

If we think about the Council of Europe's Secretary General's Democratic Pact for Europe, the connection becomes clear.

The Pact calls for:

- reinforcing checks and balances,
- safeguarding institutional integrity, and
- strengthening the mechanisms that uphold the rule of law.

NHRIs and Ombudsperson institutions are precisely such mechanisms. They give practical effect to the Pact's vision by ensuring that public power is exercised with responsibility, transparency and respect for rights. These Recommendations are therefore not simply technical guidance—they are instruments that help deliver the commitments set out in the Democratic Pact.

4. IOI and ENNHRI – essential partners

A word of appreciation is also due to the International Ombudsperson Institute (IOI) and ENNHRI. They were instrumental in shaping these Recommendations and continue to support institutions, particularly those facing threats. Their insight, solidarity, and monitoring bring real weight to our collective efforts.

5. Monitoring implementation – your contributions matter

To inform today's discussions, information has been collected through a questionnaire to member States on the implementation of both Recommendations.

And let me emphasise: the questionnaire remains open. Additional responses are very welcome and will directly support the Committee of Ministers' future assessment.

Clare OVEY

Director of Human Rights, Council of Europe / *Directrice des droits humains, Conseil de l'Europe*

Dear Chairperson, dear Commissioner, dear members of the CDDH, ladies and gentlemen,

It is a pleasure to be here with you to open this CDDH workshop.

This will be an exceptional opportunity for us to reflect upon the situation of some of the most important bodies for the protection of human rights in our member States.

Ombudsperson institutions and national human rights institutions play unique roles in ensuring respect for fundamental democratic principles, including good governance and human rights – at a time when these principles are being questioned and challenged, in Europe and elsewhere around the world.

Both Ombudsperson institutions and NHRIs are public bodies; separate from the judiciary, independent of the government, but with their competences and powers defined in national law.

Not civil society bodies themselves, but at the same time playing a crucial role in supporting and protecting the activities of civil society bodies.

Different in almost every member State, but with certain fundamental characteristics in common.

It is these fundamental characteristics that the Committee of Ministers recommendations on Ombudsperson institutions and NHRIs are intended to codify and protect.

With today's workshop, the CDDH will continue its examination of the implementation of these recommendations – and, indirectly, of the Venice Principles and the Paris Principles, to which they respectively refer.

In the background documents, you will find the voluminous results of the preparatory work done so far. Replies to a questionnaire to the member States, on what they have done to implement the

recommendations; and responses to a survey conducted within the Council of Europe, on various bodies' cooperation with ENNHRI and NHRIs.

I would like to say a few words in particular about the results of our internal survey.

Whilst the information we obtained is not exhaustive, it is extensive. It gives an overview of the general picture based on the situation in a number of specific bodies, each with their own particular mandates and working methods.

Beginning with intergovernmental committees, in several cases ENNHRI has standing observer status under the terms of reference. This is the case, for example, with the Committee on Artificial Intelligence, the Gender Equality Committee, the Steering Committee on Anti-discrimination, Diversity and Inclusion, the Steering Committee on Democracy, the Multidisciplinary Group on the Environment, and, of course, the Steering Committee for Human Rights. These are committees whose mandates cover many of the issues most likely to be of interest to NHRIs.

Observer status means that ENNHRI has the right to participate and receive information on the activities of these committees in a similar way to the member States, essentially lacking only a role in decision-making.

Taking the CDDH as an example, this has allowed representatives of ENNHRI, often drawn from individual NHRIs, to contribute their expertise and perspective to work on human rights standards in areas such as artificial intelligence, the environment, and situations of crisis. As observers, they are present in every meeting, receive all of the working drafts, and can comment and make proposals at every stage of the process.

The survey has also revealed close links between the Council of Europe's cooperation activities and NHRIs. The service responsible for human rights, justice and legal co-operation, for example, has described the involvement of NHRIs as key stakeholders in all stages of the co-operation process. More specific sectors, such as those working on children's rights and on detention and policing, report that NHRIs are involved in almost all of their cooperation projects.

Monitoring bodies have also reported on their systematic engagement with NHRIs, in areas as diverse as minority rights, detention monitoring, anti-racism and anti-discrimination, and human trafficking. This includes both meetings during monitoring visits and the opportunity to provide information for use in monitoring reports. On the other hand, GRECO – the Group of States against Corruption – given its mandate, works with Ombudsperson institutions, rather than NHRIs.

These rules and practices are a reflection of the Council of Europe's long-lasting and profound commitment to NHRIs and Ombudsperson institutions. This commitment was reinforced following the Reykjavík Declaration, adopted at the Fourth Summit of Heads of State and Government in May 2023.

In March 2025, the Directorate General for Human Rights and Rule of Law organised a very successful high-level conference with NHRIs and Ombudspersons institutions and their networks in Strasbourg.

This conference addressed current challenges related to the rule of law, the role of Ombudsperson institutions and NHRIs in upholding it, as well as the risks and opportunities associated with public decision-making in the digital era. It also provided a platform for these institutions to exchange views on reinforcing their cooperation with the Council of Europe.

The main takeaway was that there is a need to hold such meetings regularly. We will therefore organise a second edition of this high-level conference on 12-13 March 2026, this time in collaboration with the Court, and specifically within the framework of the New Democratic Pact for Europe.

The 2026 conference will be dedicated to the role of Ombudsperson institutions and NHRIs in addressing activity that undermines democratic processes, for example foreign interference in public debate and electoral processes, and the erosion of democratic checks and balances.

We are also working on implementing in 2026 other ideas that were identified during the first high-level conference. These include a workshop for NHRIs on the execution of the Court's judgements, and a sectorial session of the HUDERIA academy, intended to facilitate implementation of the Framework Convention on artificial intelligence, specifically designed for NHRIs and Ombudsperson institutions.

We understand the need for efficient communication – not only with Ombudsperson institutions and NHRIs, but with other partners such as civil society organisations, and the public at large. A lot of thought is going into the content and design of the Council of Europe’s webpages, with the aim of presenting information according to themes rather than institutional structures.

A particularly useful tool is the events calendar, accessible from the Council of Europe’s homepage. Here, in principle, one can find information on all forthcoming events. This information can be searched by various criteria, including the country, theme, and institution concerned. By searching under “human rights”, for example, one would find both this week’s CDDH meeting and today’s workshop.

This is still a work in progress, and its potential is being explored in the context of our collaboration with civil society, whose information needs are in many ways similar to those of Ombudsperson institutions and especially NHRIs. We will follow these developments closely to see what lessons they may give for our interactions with other partners and stakeholders.

But for now, I look forward to the very direct and immediate interactions of today’s workshop, and the insights and ideas of our speakers on our past, present, and future collaboration.

KEYNOTE SPEECH / DISCOURS LIMINAIRE

Michael O'FLAHERTY

Council of Europe Commissioner for Human Rights / *Commissaire aux droits de l'homme du Conseil de l'Europe*

Thank you for inviting me to this meeting of the Council of Europe Steering Committee on Human Rights.

I appreciate the opportunity to contribute to this workshop dedicated to the review of implementation by member states of the Committee of Ministers' Recommendations on Ombudsperson institutions and National Human Rights Institutions (NHRIs).

The review you are embarking on today is an important task. It is not just homework.

Ombudsperson institutions and NHRIs are crucial elements of a state's human rights and democratic architecture. Ensuring that they operate independently, effectively and in line with international standards is critical to ensuring respect for human rights.

Allow me to start with a few reflections based on my extensive engagement with NHRIs over my career.

I started my international human rights work at the beginning of the 90s with the United Nations. That was a special moment in NHRI history, because in 1993 there were two significant developments. First, the Paris Agreement that adopted the Paris Principles, which are a set of minimum standards for NHRIs, and then the Vienna World Conference on Human Rights, which recommended that all states create a NHRI. These two events created energy in the 1990s around NHRIs which was remarkable. What I remember most was the way in which that energy, for the first time ever, got governments to mainstream attention to human rights across ministries. It was the energy and push of the NHRIs that I think played an essential role in finally inserting human rights in national discourse.

At the end of the decade I went to Sierra Leone during the war, and I was involved in setting up its Paris Principles compliant NHRI. The one takeaway I want to mention to you today from that experience was the extraordinary role that the NHRI played in preparing the human rights community to be actors in the peace process.

Moving on, in the 2000s I was active in what the UN calls the Asia-Pacific region I draw a few takeaways relevant to the story of NHRIs.

The first is the importance of an NHRI when it is brave.

I saw this repeatedly. I think of the then Indonesian National Human Rights Institution, and how it challenged the state to very good effect in standing up for human well-being.

I also saw how an NHRI, when it's innovative, can do remarkable things for a society. The New Zealand NHRI, for example, transformed attention to old people in institutions in that country through its highly innovative work.

And I saw the role of the Australian Federal Human Rights Institution in confronting the state around the treatment of refugees. It was thanks to the Human Rights Commissioner that the issue triggered a global debate.

Moving on a bit, I went to Northern Ireland where for the first time I had the honour of leading a National Human Rights Institution, the Northern Ireland Human Rights Commission, and there are some very important takeaways from that as well. The first one is that, although the NHRI did not set up the peace process, it was central to it. I saw how a well-functioning NHRI can help consolidate a peace after a very complex and painful conflict.

I saw how the NHRI can overcome blockages in government, in moments when it is frozen because of difficult politics, and how an NHRI, in its independent way, can stimulate movement. Finally, a very important reflection for today, I saw the complementarity but the difference of NHRIs and Ombudsperson institutions in my work in Northern Ireland. There is a fantastic scope for cooperation between the two, but ultimately there are different types of entity which work in a complementarity. Such complementarity must always be acknowledged, recognised, honoured and built from.

I have nearly finished with reflections based on my personal experience. One last point: just before I became Commissioner for Human Rights, I was Director of the EU Fundamental Rights Agency, and I took on that role in a remarkable moment of realisation of how important NHRIs are.

I saw, for example, this awareness acknowledged in the UN Sustainable Development Goals.

It was an extraordinary negotiation achievement to obtain that the establishment and the effective and independent functioning of an NHRI be recognised as an indicator for the delivery of SDG number 16. I also saw the emergence into EU policy and discourse of a recognition of the importance of NHRIs and of their central position with regard to delivery of the rule of law. And again, I think these were very important steps.

And of course, from the outside, I saw the Council of Europe Reykjavik summit of heads of states with the explicit acknowledgement of the role of NHRIs, as further reflected in the Reykjavik Declaration and the law and practice of the Council of Europe.

And then today, and I am finally finished with biography, everyday close co-operation with NHRIs and Ombudsperson institutions is critical to my work. When I engage at the country level, I come first to the NHRI or to the Ombudsperson institution because they are my nearest relatives at the national level. I could not function, the Commissioner would be empty handed were it not for the intimate relationship with and co-operation with NHRIs and Ombudsperson institutions.

Let me this morning give you four suggestions that I think are essential to the future in terms of the vital role these institutions play in the national architecture.

The first is that we need them, we have got to fill the gaps. I find it untenable, deeply problematic that there are still member states of the Council of Europe that do not have a NHRI. We have ten Council of Europe member states that do not have an NHRI. Now I acknowledge that within that ten there is some important progress being made. A number of the ten are on the way. A number of the ten are applying to the Global Alliance of NHRIs and are looking for accreditation of an institution. I commend that. But within that ten there are some where I am not aware of progress. I have to mention Italy and San Marino.

I am not aware of any major initiative towards the establishment of NHRIs in those countries and I find that regrettable.

Second point, once we have an NHRI it is important that we work on avoiding and repairing when they face backsliding. It is unacceptable anywhere that an NHRI moves from A – meaning fully compliant with the UN Paris Principles - to B status. That is a matter of embarrassment for our member states. Where it happens, and it has happened in a number of places in the Council of Europe, it is a matter of real regret and a challenge.

Third of my four points, I think it is vital that you as representatives of the member states recognise your protective role with regard to NHRIs and Ombudsperson institutions. They are coming under threat to a degree that is quite notable.

Still civil society is the brave holder of the dam, holding the waters back and facing acute danger, sometimes death and persecution. But those pressures are moving like a contagion also to impact independent NHRIs and Ombudsperson institutions and I hope that the CDDH will be alert to that in its review.

I am thinking of political attacks, I am thinking of the demonising of the leadership of the NHRIs or the Ombudsperson institutions. I am thinking of how very often it is deeply misogynistic. When an NHRI or an Ombudsperson institution is led by a woman, that woman will commonly be subject to outrageous attacks based on their gender.

This is entirely unacceptable and I think this gender dimension of persecution needs to be captured in any guidance on the implementation of the CM Recommendations that you may consider.

We have to acknowledge the way some governments interfere with the autonomy, the functioning of their institutions through the control over the budgets. It is all very well to give independence and acknowledge independence, but if you control and play with the budget you can compromise that independence. And one way in which it is compromised I am afraid too often is by overloading the institution with mandates without due resources. We have seen this for years now. Every time another important mandate comes up through an international agreement or a treaty or whatever else, this is given to the NHRI or the Ombudsperson institution, but with no additional

resources. What do you do? You actually weaken the institution because it is expected to do more with less. This also needs attention. One more of a by no means inclusive list of the pressures under which NHRIs and Ombudsperson institutions can be placed is when there are excessive delays in the appointment of the leadership. There are some institutions that go without the leader or have the old leader continuing for years in a way that really impedes the effectiveness of the institution.

Now the last of my four points that I would encourage for your consideration is your support for the manner by which NHRIs and Ombudsperson institutions in their different roles can be enabled to be more active partners within the Council of Europe.

I mean active partners in the sense that it is not just about giving information or taking information from them, it is about recognising their essential role in the architecture and engaging with that quality, recognising that none of us can do our work without a close engagement with them. I would strongly encourage you to get beyond the point we all reach easily of information sharing and engage the more difficult one of some kind of co-equal discussions with these institutions.

And finally, to wrap up, I offer you my continuing close co-operation around the issues that are for your discussion this morning, but much more generally.

Thank you very much.

PANEL / SESSION 1

Ombudsperson institutions

Les institutions de l'Ombudsman

Marta HIRSCH-ZIEMBINSKA

Office of the European Ombudsman / Bureau du Médiateur européen

Thank you for inviting the EO to take part at this meeting. I will speak today not from the perspective of the European Ombudsman as the EU body since as such not we are directly concerned by the recommendations. I will rather speak from the perspective of the European Ombudsman as the coordinator and chair of the European Network of Ombudsmen (called ENO).

Today in the EU we have ombudsmen overseeing the central public administration in all MSs except two: Germany and Italy. In Italy and Germany there are however regional ombudsmen overseeing regional and local administration (6 in German lander and 19 in Italian regions). I will call them EU ombudsmen. They all have 4 essential characteristics: (i) investigate complaints as a major part of their activity; (ii) treat complainants as bearers of rights; (iii) take an objective view of the elements in dispute; (iv) are external to the organization(s) concerned.

In my presentation, I will first refer to the interaction of EU ombudsmen with international law and then with EU law, I will then explain what ENO does and then will share conclusions of the last week ENO's conference during which ombudsmen discussed their independence. I will conclude by sharing some thoughts about the ombudsmen' future.

The interaction with international and EU law and cooperating partners from abroad has increasingly become part of EU ombudsmen's work for citizens' legal rights and for a culture within administrative authorities that builds on principles of rule of law and respect for fundamental rights.

The interaction between the EU ombudsmen and international law is expressed in the EU ombudsmen's work in two ways: partly by the ombudsmen applying international law in their assessment of specific cases, partly by the ombudsmen contributing with information to various international bodies for the purpose of their assessment of matters in their countries.

EU ombudsmen apply in their assessment the European Convention on Human Rights (ECHR). They also apply the UN Convention on the Rights of Persons with Disabilities (UNCRPD). Six EU ombudsmen are part of the national frameworks monitoring national authorities' compliance with that convention. In countries where no specialised ombudsman for children rights exists, the national general ombudsmen may help ensure and monitor the implementation of children's rights according to the UN Convention on the Rights of the Child and contribute to the review by the UN Committee on the Rights of the Child. Twenty-one EU ombudsmen are appointed as National Preventive Mechanism (NPM) under the OPCAT. In that role, they may contribute to the UN's Periodic Reviews of their countries in relation to the UN Convention against Torture and provide information to the relevant UN Committee.

Thirteen EU ombudsmen are *National Human Rights Institutions* accredited by the Global Alliance of National Human Rights Institutions (GANHRI).

In this place I find it useful to share few thoughts about ombudsmen and human rights. As we all know, ombudsmen institutions were established as part of a transition from authoritarian and totalitarian political regimes to democracy. Therefore, they were often conceived as human rights defenders, in contrast to institutions whose rationale was the growth of the welfare and regulatory state. Subsequent developments, in particular the recognition of human rights as legal rights, and of social rights as human rights, elided the differences between these two rationales for ombudsmen.

The European Ombudsman both exemplifies and promotes a tendency to convergence in the EU. The relevant legal texts state that the European Ombudsman's mandate is maladministration, but the institution itself interprets that term as including violation of human and fundamental rights and successfully proposed that the Charter of Fundamental Rights of the European Union should include the right to good administration (European Ombudsman 2017). The European Ombudsman also contributed to shaping the Council of Europe's position that good administration includes respect for human rights (Council of Europe 2003, 2013).

In parallel to, but separate from, the growth in numbers of ombudsmen, national human rights institutions (NHRIs) were established from the late 1970s onwards with the aim of promoting compliance by States Party with obligations under United Nations (UN) human rights instruments. As regards the institutional design of NHRIs, the 'Paris Principles' contain two features that distinguish them from ombudsmen. The first is that giving an NHRI power to investigate and report on complaints concerning individual situations is optional for the State Party. The second is that the composition of an NHRI should ensure pluralist representation of the social forces of civil society. Even if, as I said, national ombudsmen have applied for and received recognition as NHRIs, the 'ombudsman' world and the 'NHRI world' retain distinct identities. Being an NHRI is an opportunity but also an obvious challenge for ombudsmen who are delivering on different mandates.

The interaction of EU ombudsmen with EU law is expressed in two ways: by applying EU law in their assessment of cases and by exercising specific mandates under EU law.

While initially many EU ombudsmen had a cautious and reticent assessment of national authorities' application of EU rules, today EU law is a natural basis for ombudsmen's review in the same way as national rules. EU ombudsmen typically have a duty to review administrative activity in the implementation of EU law, which includes ensuring that substantive and procedural rights arising under EU law are fully respected within their national legal systems.

As regards specific mandates under EU law, thirteen EU ombudsmen are appointed as equality bodies under the EU equality directive as transposed into national law (and thus receive EU funding for these activities). Five EU ombudsmen are appointed as bodies protecting

whistle-blowers under Directive 2019/1937 as transposed into national law. Seven EU ombudsmen act as enforcement bodies of the Web-accessibility Directive (Directive (EU)2016/2102) as transposed into national law.

About half of the entire number of the EU ombudsmen are also tasked with human rights monitoring of forced returns under the Returns Directive (Directive 2008/115/EC) as transposed into national law. That monitoring role has since been expanded, and today many ombudsmen are part of a pool of monitors that supervise forced returns organised by the European Border and Coast Guard Agency (Frontex). Finally, some EU ombudsmen are tasked to deal with complaints concerning the use of EU funds, under EU Common Provisions Regulation and/or are part of the national committees monitoring the use of the Funds in compliance with the Charter, in accordance with regulations governing EU funds.

This diversity of tasks of EU ombudsmen, substantive differences in terms of functions, powers and orientations between public sector ombudsmen, either national or regional, all of that have clear repercussions on what ENO is and what it does.

If compared to all other networks of which public ombudsmen from the EU MSs are members, the ENO constitutes the most powerful representation of the EU ombudsmanship: it includes 25 national ombudsmen, 41 regional ombudsmen and the EO.

In fact, ENO which has a low degree of institutionalisation, can be better defined not as a network but as a community of ombudsmen upholding EU law under the coordination of the EO. ENO was created in 1996 to '*make citizens' rights under EU law a living reality at all levels within the Union and its Member States.*' In other words, the ENO's objective was defined as ombudsmen's cooperation in the implementation of EU law in the Member States. This means much more than exchange of good practices.

ENO has offered to national ombudsmen tools, which cannot be followed by national ombudsmen within other networks or organisations they are part of, namely queries and investigations in parallel.

Ombudsmen cannot seek guidance from the Court of Justice of the EU when assessing whether administrative authorities have complied with applicable EU law. Instead, a special procedure was implemented in 2007, by which members of the ENO can submit requests to the EO concerning issues, which have arisen as part of an investigation, and which concern EU legislation. The EO either replies to ombudsmen queries himself/herself or assists ENO by obtaining expert assessments from the relevant EU institution, typically the European Commission.

Another ENO specific tool are 'investigations in parallel'. Already at the time of the creation of the EO and the ENO, the problems of integrated multilevel administration in the EU were central problems to EU ombudsmen' review. Today, it is rare that the implementation of EU policy areas is organised in a way which does not involve some form of composite decision-making procedures, in which EU and Member State administrations cooperate in preparation of the formal adoption of a final decision either on the national or the EU level. With regard to allocating powers to address maladministration, this distinction of supervisory levels in the face of integrated administrative procedures is highly problematic. This is why the ENO introduced a new tool of cooperation between national and regional ombudsmen and EO or in cross-border matters between national and or regional ombudsmen - investigations in parallel. The inquiries by EO and national ombudsmen significantly improves the accountability of the EU and national administrations for their exercise of shared competence. The resulting coordinated ombudsmen-review becomes a relevant form of citizenry protection. While the EU Courts are essential institutional guarantors of the rule of law, co-operation between the EO and EU ombudsmen within the ENO to create an effective system of non-judicial protection aims at relieving the burden both on the European Courts and on the European Commission (in its role as guardian of the Treaty.)

One of the ENO major events is its annual Conference. The conclusions of this year conference which took place last week at the EP in Brussels, may be relevant for the review of the implementation of the CM recommendations. Ombudsmen openly discussed many challenges in their day-to-day work, such independence and multi-monitoring under EU law. I would like to share with you some of these conclusions. In a raw version, because the reports are not yet drafted. Since the Chatham House Rule applied, I will not attribute the conclusions to specific ombudsmen.

It was found that Ombudsmen's independence may be still under threat in various jurisdictions. Even if fundamental values of ombuds institutions at the core of their existence are confirmed by constitutions and laws, as well in internationally recognized frameworks, including the Venice Principles and the United Nations General Assembly Resolution on the Role of the Ombudsman, there are still issues with appointments and security of tenure, mandate, powers of investigation, and foremost with the effectiveness of ombudsmen oversight.

In some jurisdictions, the governments do not accept easily the Ombudsman's overview, and ombudsmen may act under pressure exercised in different forms: by cutting the budget or not accepting ombudsmen's calls for the increase of budget; by assigning additional mandates without additional funds; by extending time for the election of a new ombudsman after the previous one has ended the mandate etc.

The main ombudsmen's problem is however the shortage of human and financial resources, when the additional funding does not come together with the assignment of new mandates for ombudsmen. Member States systematically add new mandates under EU law to the Ombudsman's traditional duties. Creating or designating mere 'fig leaf' structures would be however incompatible with the letter and spirit of the EU legislation setting out these mandates. Ombudsmen provide a guarantee that this would not be the case, but they need funds to be able to effectively and efficiently enlarge their competence. Moreover, ombudsmen must think creatively how to avoid conflict of interests and ensure impartiality if they monitor on the one hand and investigate on the other, into the same issues. They may also have a choice not to accept monitoring duties themselves and opt for 'monitoring' the monitors instead. Another issue for ombudsmen is how to ensure their independence if ombudsman is part of a collective monitoring body such the one monitoring FR compliance of the EU Funds.

In addition, ombudsmen also discussed the European Commission's methodology to draft the Rule of Law Reports. They found that there is a need for a separate section concerning all ombudsmen in each country chapter for all 27 Member States and that ENO should provide a joint contribution.

Moreover, to support and accompany the process for the preparation of the annual Rule of Law Report, the Commission set up a network of contact points in the MSS to regularly update and exchange on the process. Ombudsmen expressed regrets that they are not part of this network.

In terms of conclusions: Several contemporary challenges for ombudsmen as institutions are evident. Governments in certain countries explicitly question the political and constitutional foundations of liberal democracy, deploying majoritarian arguments that make no much space for accountability before ombudsmen. Elsewhere, changes in the way that public opinion is formed and taken into account have weakened the authority of ombudsmen institutions that act as gatekeepers, filters, and sources of reliable information. The rise of the internet and social media lead people to seek out views that they already share and information to support those views. These developments create a dilemma for ombudsmen. Should they compete for public attention in the new environment even if their message becomes distorted? Or should they stay in the background and risk losing the capacity to persuade public opinion that allows them to be effective? It does not help that Governments very often see ombudsman as an opposition party, not as a constructive friend. How to change these dynamics? Can ombudsmen really contribute to the increase of citizens' trust in the public administration?

With these two open questions I would like to thank you for your attention.

Delphine FREYMANN

Deputy Secretary, European Commission for Democracy through Law (Venice Commission) / Secrétaire Adjointe, Commission européenne pour la démocratie par le droit (Commission de Venise)

Dear Chair, Speakers, dear members of the CDDH,

Ladies and Gentlemen,

On behalf of the Venice Commission, I would like to thank you very much for the invitation at this workshop for Ombudsman and National Human Rights Institutions.

The Venice Commission, as many of you know, is the Council of Europe's advisory body on constitutional matters. It has 61 member states, the 46 of the Council of Europe plus 15 more from the Americas, Africa and Asia. Its primary role is to provide legal advice and assisting states in bringing their legal and institutional frameworks in line with European and international standards in the fields of democracy, human rights and the rule of law.

The core mission of the Venice Commission is to provide, upon request, Opinions containing legal assessments of constitutions and legislation and relevant recommendations aiming at aligning such texts to international standards and comparative good practices. The Commission's assessments, on the one hand, are based on international standards, and, on the other hand, contribute to identifying and developing them. The Commission has thus adopted reference texts that have often become global standards in their respective field: with particular regard to the Ombudsman institutions, the Principles on the Protection and Promotion of the Ombudsman Institution ("the Venice Principles") adopted in 2019.

The Principles, which represent the most comprehensive set of constitutional and legal principles relating to Ombudsman institutions, were endorsed by all the statutory bodies of the Council of Europe: the Committee of Ministers (CM), the Parliamentary Assembly, and the Congress. At a global level, the Principles were recognised as global standard by the General Assembly of the United Nations in Resolution 75/186 of 16 December 2020.

The Venice Principles were drafted for but more importantly with Ombudsman institutions. A broad and inclusive process of consultation with key European and international human rights interlocutors, international and regional network of Ombudsman and National Human Rights Institutions, was carried out, ensuring they reflected the practical needs and realities of these institutions.

The Venice Principles have filled the void that existed in terms of a lack of standards and guidelines for those Ombudsman institutions that are not NHRIs, and for which the Paris Principles were not suitable.

The Venice Principles promote a model of Ombudsman institution with a broad human rights mandate: examples are the principle on the protection of whistleblowers, or the principle supporting the possibility, for the Ombudsman Institution to intervene before domestic courts and contest the constitutionality of law in front of the Constitutional Court.

The 25 Principles cover all key aspects of the Ombudsman Institutions' functioning, including the establishment, appointment, mandate, competences, guarantees of independence, immunities, relations with authorities.¹

If one had to identify a single characteristic that stands out from the Principles, it would be the independence of the institution.

Independence is of course rooted in the way in which the selection and the appointment/dismissal are carried out; in the provision of a sufficiently long but not unlimited term of office.

But the independence should be also functional, as the Ombudsman should not receive or follow instructions from any authority and he or she must enjoy functional immunity in his or her decision-making, oral or written activity, even beyond the end of his or her term of office.

¹ - the establishment, status and institutional model;
- the appointment and term of office;
- Immunity and security of tenure;
- Mandate and powers,
- Reporting
- Most importantly, independence

Lastly, independence should be also financial/administrative and in that regard support from the State is essential: independent and sufficient budgetary resources should be provided and, of course, sufficient human resources recruited by the ombudsman themselves, as well as a sufficiently flexible structure.

The survey conducted by the CDDH and which has been distributed prior to this workshop shows that some countries have indeed formally or informally evaluated the compatibility of the Ombudsman institutions' mandates with the Venice Principles and with the 2019 CM Recommendations.

Our role as the Venice Commission is to issue legal opinions on legislation relating to the establishment and functioning of ombudsman institutions. Ombudsman Institutions from member states of the Commission whose institution has constitutional status can ask the Venice Commission to assess a draft law affecting the institution.

Since their adoption in March 2019, the Venice Commission has adopted 10 opinions which dealt with laws affecting Ombudsman institutions: Andorra, Armenia, Hungary, Kazakhstan, Kyrgyzstan, Malta, Republic of Moldova, the United Kingdom. 5 of this were requested directly from the Ombudsman institutions themselves. In these opinions, the Commission assessed relevant constitutional and legislative texts against international standards and in particular the standards set out in the Venice Principles and in the relevant Recommendations of the Committee of Ministers, notably CM/Rec(2019)6.

The Opinions issued by the Commission since 2019 cover three different kind of situations:

- 1. Opinions linked to laws directly limiting the mandate, effectiveness and independence of Ombudsman Institutions*

In one of its opinions, the Venice Commission assessed new legislation regarding the Ombudsman's staff and the institution's budgetary independence. On key personnel policy issues, the Ombudsman was now directly or indirectly dependent on government offices. This jeopardised the independence of the institution and its effectiveness. Concerning the budget of the institution, the Commission found that explicitly providing for budget negotiations within Parliament rather than with the executive would prevent the budgetary process from

being used in a way that undermines the independence of the Ombudsman.

2. Opinions related to laws broadening the mandate of the Ombudsman Institution

In another opinion, the Commission assessed the legislation providing for the merger of the equality body with the Ombudsman. The Commission recalled that there is no standard model for NEBs/NHRIs in all Council of Europe member states and that States enjoy a wide margin of appreciation as regards institutional arrangements. However, the Commission found that models chosen must “strengthen the institution and enhance the level of protection and promotion of human rights and fundamental freedoms in the country”, and the “practical effectiveness of the chosen framework for such institutions should be [...] consistent with internationally accepted and recognized standards, and this framework should neither threaten the autonomy nor the independence of the institution nor diminish its ability to carry out its mandate.

3. Opinions assessing general compliance with the Venice Principles

The Commission has also been asked to assess laws on the creation and functioning of Ombudsman institutions at the very beginning of the legislative process which allowed the Commission to provide recommendations to further develop the Ombudsman institution, to strengthen its role and to broaden its competences in order to provide meaningful protection of human rights.

Ladies and Gentlemen,

The Reykjavik Declaration, adopted at the 4th Summit of Heads of State and Government of the Council of Europe (May 2023), called for “raising the profile of, and strengthening, the Venice Commission, for example by giving more visibility and status to its Rule of Law Checklist and exploring ways the Organisation can better support the implementation”. In its action plan for implementation of the Reykjavik declaration, the Committee of Ministers of the Council of Europe called for updating the Venice Commission Checklist; the Commission is now about to adopt this update at its December plenary. Of course we cannot anticipate what it will entail, but it is clear from Venice Commission’s country-specific opinions already, that Rule of Law violations often manifest a winner-takes-all attitude and a simplistic

notion of majoritarian democracy. Rule of Law and democracy regression have indeed accentuated the significance of effective checks and balances and independent non-majoritarian institutions, such as ombudsman institutions. This is certainly one of the aspect that will be covered by the updated checklist with a new benchmark on checks and balances. Since 2016, there have also been rapid developments in technology affecting certain basic premises of the Rule of Law. These developments will be taken up in the revised version of the Rule of Law Checklist, either within the benchmarks themselves or in a separate section on particular challenges to the Rule of Law. The Ombudsman Institutions, as public institution, face these challenges in they work and we hope that the updated checklist will be of use in their work.

I would like to take this opportunity to mention our campaign seeking to make the principles of the Rule of Law understandable, interesting, and available to everyone. Through the distinctive images of Ms Nadine Theuma, a Maltese artist and illustrator, the themes of the Rule of Law are explained from a fresh and creative perspective. (Explore the guide [“The Rule of Law: A User Guide \(2025\)”](#))

I thank you very much for your attention and I look forward to our exchanges.

PANEL / SESSION 2

National Human Rights Institutions

Institutions nationales des droits humains

Beate RUDOLF

German Institute for Human Rights, Member of the Board of the European Network of National Human Rights Institutions (ENNHRI) / *Institut allemand des droits humains, Membre du Bureau du Réseau européen des Institutions nationales des droits de l'Homme (ENNHRI)*

Introduction/ setting the scene

The 2021 Committee of Ministers (CM) Recommendation on NHRIs, affirms NHRIs as pillars for promoting human rights, democracy and the rule of law, and offers the blueprint to ensure they can do so, including in cooperation with the Council of Europe. Setting out what NHRIs need to thrive as effective, pluralist and independent institutions, it complements the global standards of the [UN Paris Principles](#).

Since the adoption of the CM Recommendation, ENNHRI and NHRIs have taken various steps to advance its implementation. ENNHRI has included consistent reference to the Recommendation in its advice to state authorities on the establishment and strengthening of NHRIs, or when providing support to NHRIs facing structural challenges and threats in-country.

ENNHRI's analysis of the current implementation of CM Recommendation 2021/1

To inform the review of the implementation of the CM Recommendation on NHRIs, ENNHRI has developed country-specific reports across Council of Europe Member States, based on information provided by our members. We invite you to check your national report and ENNHRI's cross-regional findings by following the QR link provided on the leaflets handed out in the room. Some national reports are still forthcoming and will be published before the June 2026 CDDH meeting [*when the report on the implementation of the CM Recommendation on NHRIs will be developed*].

I will focus my presentation today on the key cross-regional findings from ENNHRI's report, starting with a presentation of key areas of progress, and followed by the commitments of the Recommendation which require further progress. I will end my presentation with highlighting how we believe meaningful participation and support for NHRIs at the Council of Europe should be advanced, in line with the commitment from the Recommendation on NHRIs, and as mirrored in the 2023 outcome Declaration of the Reykjavik Summit.

Key areas of progress since 2021:

1. *There are now NHRIs and ENNHRI members in 44 of 46 Council of Europe states, with more NHRIs achieving Paris Principles compliance.*

Since 2021, the presence of NHRIs in Europe has significantly expanded. ENNHRI's membership now virtually covers the whole Council of Europe geography and thereby is a strategic counterpart for the Council of Europe. Beyond more NHRIs, they also increasingly comply with the Paris Principles, signposting their independence and strength.

Twenty-nine Council of Europe Member States have an NHRI accredited with A-status, indicating full compliance with the Paris Principles, and seven Member States [*Azerbaijan, Belgium, Hungary, Montenegro, North Macedonia, Slovakia, and Türkiye*] have NHRIs that are accredited with B-status, indicating partial compliance with the Paris Principles. There are nine states in which an ENNHRI member exists and has committed to taking steps towards accreditation [*Andorra, Czech Republic, Kosovo*, Iceland, Liechtenstein, Malta, Monaco, Romania, and Switzerland*]. Accordingly, there are currently

only two Council of Europe Member States without an ENNHRI member, working towards compliance with the Paris Principles: Italy and San Marino.

New institutions have been established by Council of Europe Member States since 2021, including through tailored advice from ENNHRI. This has been the case for the new institutions in Iceland, Liechtenstein, Sweden and Switzerland. When joining ENNHRI, institutions receive tailored support to apply and undergo first-time accreditation, including through ENNHRI's observer role at the Sub-Committee on Accreditation (SCA) of GANHRI. This has also resulted in more internationally accredited NHRIs across Council of Europe Member States. Notably, the recently established Swedish NHRI has been first-time accredited with A-status in 2024.

In other countries, relevant institutions are taking active steps to comply with the Paris Principles, but further government action is needed in order to ensure the necessary legislative amendments to ensure a broad human rights mandate, pluralism and independence. This includes in Belgium, Montenegro, North-Macedonia, Slovakia, Romania and Malta.

2. NHRIs' unique broad human rights mandates at national level position them as ideal national partners for the Council of Europe.

Virtually all NHRIs in Europe are multi-mandated institutions, encompassing NHRIs' broad human rights mandate, in addition to other mandates. Around half of ENNHRI's membership are ombuds-type NHRIs, in addition to commissions or institutions. Independent of their typology, what is common to all NHRIs, and as required by the Paris Principles, is that they are:

- ✓ Established at national level -implying that in principle there is only 1 NHRI per country;
- ✓ Be pluralist in nature -which requires institutionalised cooperation with civil society;
- ✓ Have a broad mandate to promote and protect human rights, including the core functions of monitoring and reporting on the human rights situation in-country, providing recommendations to government, and promoting awareness of human rights, including ratification of international human rights instruments and their implementation.

Their broad mandate at national level and pluralist set-up places NHRIs in a unique position to contribute to Council of Europe standard-setting, and to promote and advance implementation of Council of Europe standards at home. For example, and as recalled in the CM Recommendation, NHRIs are key actors to enhance execution of judgments of the European Court of Human Rights (the Court). Fundamentally, they do so by bridging the Court's judgments with national realities, making use of the different roles at their disposal under their broad mandate. This includes independent information provision through Rule 9 interventions before the Committee of Ministers, as well as promoting and raising awareness of the importance of implementation of Court judgments for society in-country and standing up for the independence and legitimacy of the Court when this is being questioned.

Through ENNHRI, NHRIs' leverage and position in support of the Court can be strengthened. This is exemplified by ENNHRI's recent [statement in support of the Court](#) following the letter issued by nine governments of Council of Europe Member States arguing that the Court's case-law on the expulsion of migrants convicted of crimes interferes with government's decision-making power.

3. Increasing Awareness of NHRI Mandate and Role by State Authorities

The CM Recommendation is an important instrument to clarify the NHRI mandate and key characteristics to state authorities, including compared to other national bodies and civil society in European countries. The Recommendation provides that Member States should foster NHRI awareness and co-operation of all relevant public authorities. This Principle reflects the importance of a conducive ecosystem around an NHRI for it to carry out its mandate effectively and relates to two connected aspects: an overall awareness of what an NHRI is and does; and (a stance of) factual cooperation with NHRIs by state authorities.

The majority of ENNHRI members confirm that state authorities in their respective countries have a generally good awareness of the NHRI mandate, independence and role. To an extent, this positive finding is a natural correlate of the gradually longer existence of NHRIs across Council of Europe Member States, and authorities becoming gradually better aware of their unique added value.

Key areas where further improvement is needed:

- 1. Ensuring independent and sustainable resources for the ever-more intensive work NHRIs have, including additional mandates.*

In order for NHRIs to function effectively, the CM Recommendation and the UN Paris Principles prescribe that NHRIs must be provided with an adequate level of funding to carry out their mandate and be able to freely determine funding allocations. The CM Recommendation and the UN Paris Principles also highlight that when Member States grant additional competences to NHRIs, they should be allocated additional resources to effectively discharge their functions.

However, the lack of adequate resources for NHRIs to carry out their mandate is the most consistently recurring problem across the Council of Europe. Only around one in five ENNHRI members informed that they considered their budget adequate. The significant majority of ENNHRI members reported that the resources provided to their institutions were not sufficient to fulfil the breadth of their mandates. In exceptional cases, budget cuts are so fundamental that they risk preventing the NHRI from carrying out its core mandate, as has been reported by institutions from Belgium (Unia), North-Macedonia and Romania.

The lack of adequate resources for NHRIs is exacerbated by an overall challenging funding context for human rights actors and increasingly expanding mandates allocated to NHRIs. This includes mandates deriving from Council of Europe frameworks (such as the monitoring mandates deriving from the Istanbul Convention and from the Convention on Action against Trafficking in Human Beings) as well as UN and EU regulation. This indicates the relevance of further support from the Council of Europe and other international actors. ENNHRI has been advocating for regional regulation to include a requirement of additional funding when providing additional mandates and roles for NHRIs and other independent bodies (as, for example, in the context of the Council of Europe Framework Convention on Artificial Intelligence adopted in 2024). This, however, is not foreseen in many cases, including in regulation or in practice.

2. Ensuring effective, timely and reasoned follow-up of NHRI recommendations.

The CM Recommendation calls for Member States to put in place a legal obligation for all addressees of NHRI recommendations to provide a reasoned and timely reply, and to develop processes to facilitate effective and timely follow-up in practice. This provision is particularly important because it complements the UN Paris Principles. In almost half of the Council of Europe Member States, state authorities are legally obliged to respond to NHRIs' recommendations or inquiries. While it is relevant to have a legal obligation in place, this appears not to be sufficient to ensure follow-up in practice. For a majority of states where a legal obligation applies, lack of follow-up or the need for more effective follow-up has been reported by NHRIs.

In many countries, NHRIs themselves develop and establish mechanisms to facilitate follow-up by state authorities to their recommendations and seek to engage in constructive dialogue with state authorities to advance implementation.

Given the key importance to advance follow-up to NHRIs' recommendations, further action in this area would be key. Beyond state authorities and NHRIs themselves, international actors such as the Council of Europe and EU can support this. The European Commission's rule of law report on Croatia, with recommendations to the state to advance follow-up of the NHRI's recommendations, has - for example- been an instigator of positive change in-country, and is an example of complementarity between Council of Europe standards with EU, Member State and NHRI action.

3. Protect and support NHRIs against the increasing intimidation, threats and pressure they face.

The CM Recommendation provides that States should take all measures necessary to protect and support NHRIs against threats and harassment and any other forms of intimidation, including through ensuring functional immunity. Further, it sets out that any cases of alleged reprisals or intimidation against NHRIs, or against those who co-operate with them, should be promptly and thoroughly be investigated, and the perpetrators brought to justice. Thereby, the CM Recommendation sets out the most developed European standards on the protection required from Member States with regards their NHRI and also complements the Paris Principles.

Worryingly, however, NHRI reporting shows a negative trend, with a quarter of NHRIs across the Council of Europe reporting intimidation, threat and attacks over the past year. This is linked to a wider context of increasing challenges and threats to human rights protection mechanisms and human rights defenders and underscores the critical importance of addressing this more effectively.

The majority of ENNHRI members report that there are measures in place to safeguard NHRIs' functional immunity. At the same time, there continues to be a lack of specific measures to more holistically protect NHRIs from the increasingly wide array of other forms of threats, attacks and harassment. For example, it is rare that threats are investigated and lead to prosecution, even where NHRIs report cases to the police.

In increasingly challenging domestic contexts, support from international and regional counterparts also becomes more important. ENNHRI has set up a Contact Group of partners, including a representative of the Council of Europe Commissioner for Human Rights and the Venice Commission, which facilitates early information sharing on NHRIs facing threats, and potential coordination on follow-up actions. Further, ENNHRI also advocates to step up efforts to establish and strengthen effective regional protection mechanisms for human rights defenders, including at the Council of Europe.

More Council of Europe support for and meaningful engagement with NHRIs

Beyond the key requirements to ensure effective, pluralist and independent NHRIs in Council of Europe Member States, the CM Recommendation on NHRIs also calls for Member States to seek new ways to strengthen the role and meaningful participation of NHRIs and ENNHRI within the Council of Europe. It further recommends strengthened support for NHRIs, such as through Council of Europe cooperation programmes. This part of the Recommendation has also been echoed at the highest political level by heads of state and government in the Outcome Declaration of the 2023 Reykjavik Summit.

Some good practice examples of Council of Europe outreach to NHRIs enabling meaningful participation are in place, including at the department for the execution of judgments and at the European Social Committee. Some further initiatives have been taken more recently, following the Reykjavik Summit. This has included dedicated attention

for NHRIs in the context of the newly established network of execution coordinators [*chaired by Germany*], and the organisation of a high-level conference on ombuds and NHRIs under the Council of Europe Presidency of Luxembourg, which is intended to become more regular. At the same time, NHRIs across the Council of Europe indicate that there is great potential to further advance cooperation between them and the Council of Europe, through more structural initiatives. In particular, ENNHRI and its members recommend to:

1. Develop a strategic and more visible partnership with NHRIs and ENNHRI to promote and protect human rights, democracy and the rule of law.

A strategic partnership between the Council of Europe and NHRIs should aim to institutionalise structured cooperation, ensuring NHRIs' independent expertise systematically informs Council of Europe monitoring, standard-setting, and capacity-building activities to advance human rights, democracy and rule of law on the ground. It would strengthen the visibility and impact of NHRIs' contributions to the Council of Europe, support coordinated responses to emerging human rights, democracy, and rule of law challenges at the national level, and promote mutual capacity-building and exchange of good practices. Thereby, it would strengthen coherence and effectiveness between national and regional human rights protection systems, while reinforcing public trust in both the Council of Europe and the work of NHRIs.

2. Ensure more meaningful NHRI participation across Council of Europe processes, including structural involvement of NHRIs in developing and implementing the Council of Europe acquis.

NHRIs mention at least fourteen Council of Europe bodies with which they engage in an individual capacity, in the context of country-specific procedures. At the same time, they also flag difficulties in navigating complex and varying procedures across multiple Council of Europe bodies, particularly when national issues cut across different Council of Europe thematic or monitoring frameworks. In a context of limited resources and increasing challenges both for the Council of Europe and for NHRIs, investing in enhanced mutual understanding and effective information exchange appears key. ENNHRI members suggest a wide range of practical ways to advance this, many of which are in place at the United Nations, as Tamar

Gvaramadze and Vladlen Stefanov will explain in their interventions.

Beyond individual engagement, NHRIs also engage with the Council of Europe as a collective, under ENNHRI's umbrella. Our active contribution to CDDH meetings as observer is a good practice example in place. Further progress can be made at the level of collective engagement, including through regular institutionalised dialogue between ENNHRI and Council of Europe decision-making bodies such as the CM, Parliamentary Assembly and the Secretary-General and inclusion in high-level intergovernmental meetings such as the Reykjavik Summit. This could inform the Council of Europe of emerging challenges and trends and to inform responses, based on credible and reliable information from NHRIs, thereby enhancing legitimacy and impact of Council of Europe responses on the ground.

3. Provide further political and technical support for NHRIs in-country to support their resilience and standing.

Political support for NHRIs is provided already at some occasions, and ENNHRI members flag in particular the support already provided by the Council of Europe Commissioner for Human Rights. Yet, more could be done to more consistently and pro-actively doing so, especially in the current context.

Clear recognition of the role of NHRIs as Council of Europe key partners at national level in promoting human rights, democracy and the rule of law should be a priority. This would require further active involvement of the Council of Europe's high-level bodies in supporting the visibility and mandate of NHRIs in Member States, their independence and adequate funding. Practical ways of doing so could include regular inclusion of issues relating to NHRIs in the agenda for political dialogue with states, making public statements in support of NHRIs, and also joint activities with NHRIs such as monitoring visits.

In terms of technical support, various NHRIs located in countries with Council of Europe offices indicate the relevance of ongoing Council of Europe support programmes. Beyond enhancing more consistent consultation with and support for NHRIs in the context of existing cooperation programmes, the programmes could also be expanded further to countries where no Council of Europe offices are located. This is especially

relevant while criticism about, and even threat of withdrawal from, the Council of Europe system is significantly growing in Western European countries, and while NHRIs can be forefront supporters for the Council of Europe in-country.

In conclusion, the CM Recommendation on NHRIs has proven an important instrument to establish and strengthen independent, pluralistic and effective NHRIS across Council of Europe member states within the past five years. It also provides an important compass for addressing the challenges and opportunities that lie ahead. ENNHRI stands ready to further cooperate with Member States and the Council of Europe, as well as any other relevant actors, to further make the CM Recommendation a reality on the ground, with a view to enhancing the promotion and protection of human rights, democracy and rule of law.

Thank you.

Tamar GVARAMADZE

First Deputy Public Defender of Georgia, Global Alliance of National Human Rights Institutions (GANHRI) / *Première Adjointe au Défenseur public de Géorgie, Alliance mondiale des Institutions nationales des droits de l'Homme (GANHRI)*

Good morning colleagues and thank you very much for the opportunity to speak today.

It is a pleasure to join this workshop, which opens an important phase in reviewing the implementation of the Committee of Ministers Recommendation (2021)¹ on National Human Rights Institutions.

I am very excited to be joining you today. Exactly five years ago, I took part in the informal intergovernmental consultations that preceded the adoption of the recommendation concerning NHRIs, and it feels meaningful that life has brought me back to contribute to the evaluation of its implementation.

This workshop provides a timely and valuable moment for reflection of exchange and collective learning. It gives us the opportunity to explore what has been achieved, to identify the challenges that remain, and to consider how the roles of both National Human Rights Institutions and Ombudsman institutions can be further strengthened across the Council of Europe region.

Such dialogue is essential, especially at a time when we are witnessing the backsliding of democracies, the erosion of democratic institutions, poverty, securitization, the climate crisis, and the uncertain impact of modern technologies — particularly AI — on human rights.

Today I am addressing you on behalf of the Global Alliance of National Human Rights Institutions, GANHRI. I will also speak from the perspective of the Public Defender of Georgia, an institution that combines both Ombudsman and NHRI mandates alongside with other several mandates.

Our institution currently serves on the Bureau of GANHRI and the Board of ENNHRI, which gives us a unique point to observe developments and to engage at national, regional and global levels.

I would like to warmly acknowledge my co-speakers representing the European Network of National Human Rights Institutions (ENNHRI) and the Office of the United Nations High Commissioner for Human Rights (OHCHR).

GANHRI's collaboration with ENNHRI and OHCHR is at the heart of our shared mission: to promote, support, and safeguard the independence and effectiveness of NHRIs worldwide.

GANHRI and Its Global Rôle

Established in 1993, GANHRI brings together more than 120 NHRIs from all regions of the world and serves as the global platform to establish, support, strengthen and be a voice for NHRIs.

Its mandate is firmly rooted in the United Nations Paris Principles, the globally recognised minimum standards for the status and functioning of NHRIs, endorsed by the United Nations General Assembly.

In close partnership with OHCHR and regional NHRI networks, including ENNHRI, GANHRI is mandated to carry out accreditation of NHRIs, provide capacity-building and peer support, develop guidance and standards, and represent NHRIs in international human rights fora.

What Are NHRIs?

Allow me to briefly recall what National Human Rights Institutions are, and why they hold a unique place within national human rights protection systems, including regional – European level.

NHRIs are State institutions — established by the State through constitutional or legislative provisions — yet they must operate independently from the State and from the government.

We are fundamentally different from NGOs, as we are established for the specific purpose of promoting and protecting human rights, and carry statutory powers, formal responsibilities, and direct points of contact with State institutions that NGOs do not possess.

NHRI broad mandate may include monitoring and reporting on the human rights situation; advising government, parliament and public bodies; receiving or facilitating complaints; undertaking human rights education and awareness-raising; cooperating with civil society and national partners; and engaging with international and regional human rights mechanisms.

NHRIs serve as a bridge both between the State and civil society, facilitating dialogue, cooperation and accountability, and between national practice and international human rights obligations, helping to bring global human rights standards into everyday implementation.

What are the guarantee of our independence – GANHRI Accreditation – Guaranteeing Independence and Credibility of our institutions

As already mentioned, one of core functions of GANHRI is the accreditation of NHRIs, carried out through the Sub-Committee on Accreditation, under the auspices of the Office of the United Nations High Commissioner for Human Rights.

The Paris Principles, endorsed by the UN General Assembly in 1993, define the minimum standards for independence, pluralism, and effectiveness of NHRIs.

The accreditation process is a peer-based, rigorous, and transparent review, assessing each NHRI against the Paris Principles and SCA General Observations.

Accreditation ensures that NHRIs are independent in law, membership, operations and funding, have a broad mandate covering all human rights, reflect pluralism in their composition, possess adequate powers, resources and accessibility, and engage effectively with national and international partners.

The SCA has been conducting accreditation since 1999, and its jurisprudence has evolved to reflect growing expectations of NHRI performance.

Accreditation is not a one-off exercise but a continuous process of accountability and improvement.

A-status accreditation represents full compliance with these standards — a mark of legitimacy, credibility, and trust.

B-status accreditation indicates progress toward compliance, recognizing developing institutions on their path toward full alignment with the Paris Principles.

United Nations Recognition and Engagement

GANHRI accreditation also provides NHRIs with formal recognition and participation within the United Nations system which I believe will be also mentioned during next interventions.

Since I want focus on the Accreditation process of NHRIs as a Possible Model for Regional Engagement

The GANHRI accreditation system—widely respected for its transparency and rigour—gives A-status NHRIs institutionalised participation rights in UN decision-making, based on their compliance with the universal standards of the Paris Principles.

Beate talked about situation in states and the level of implementation of the recommendation she also pointed out some recommendations thus from my side from GANHRI perspective I think this is a timely opportunity to consider whether accredited NHRIs could also be granted formal participation rights within Council of Europe decision-making.

Such an approach would help align regional practice with international standards and ensure that independent national expertise contributes directly to the Council's work.

The relevance of the recommendation comes even from my country's example.

Ombudsman Institutions and NHRIs

Particularly, it is important to note that the Paris Principles do not prescribe a single institutional model for NHRIs. They may take different forms, including the commission model, the ombudsman model, the consultative council model, or the research institute model. States may choose the institutional form that best fits their national context, provided the institution meets the Paris Principles in law and in practice.

Among various models of NHRIs, the ombudsman model is well known across the Council of Europe region. However, it is important to emphasise not every Ombudsman institution is an NHRI.

My country's example is exactly the one which combines different mandates and is a hybrid institution

We have broader human rights mandate, covering all rights for all individuals, engaging in systemic monitoring and reform, advising government on human rights law and policy, conducting human rights education, and participating in international human rights mechanisms.

Recently we have gone through fourth accreditation process and maintained A-status accreditation, confirming full compliance with the Paris Principles.

We oversees human rights protection across all public authorities, investigates violations based on the complaints we receive and based on own initiative, and submit recommendations and reports to Parliament.

We are entitled to submit an *amicus curiae* to general and constitutional court and also, we can file constitutional lawsuit;

As a hybrid institution — encompassing not only the ombuds/NHRI function but also the NPM, the CRPD monitoring body, the child rights ombud, and the equality body — we benefit from a broad, multi-mandated structure. This enables us to promote the implementation of ECtHR judgments through monitoring, inquiries, and reporting on human rights violations in the country. To oversee the execution of ECtHR judgments, we prepare and submit Rule 9 communications to the Department for the Execution of Judgments (DEJ) and to the Committee of Ministers (CM) of the Council of Europe. The PDO has submitted to the European Court of Human Rights a request to be involved as a third party/*amicus curiae* brief) in several cases as well.

In addition, from 2021 we began submitting alternative reports to the European Committee of Social Rights of the Council of Europe.

We not only make active use of various mechanisms within the Council of Europe's monitoring ecosystem — some examples of which I have already mentioned — but we also participate in cooperation-framework activities. We have even contributed twice to the Council of Europe's strategy and action-planning processes for Georgia. However, I should underline that this involvement has come through a long-standing, learning-by-doing approach, rather than through accessible structural processes — which may present a challenge for many of our NHRI peers.

I want also to mention that mostly we have experience of working under two pillars of COE: monitoring and cooperation, we lack to be part of standard setting dimension.

Not only on COE level as NHRI Public Defender's Office of Georgia has been involved in the UPR process since 2011 at UN level, starting from the first cycle for Georgia to this date. Essential part of the involvement has been submitting alternative reports and participating in the UPR sessions.

In addition, we provide different written inputs with regards to the Resolutions adopted by the UN Human Rights Council as well as Call for Inputs –made by different UN Special Rapporteurs. We submit surveys before the regional networks, etc.

Closing Remarks

In the context of the ongoing CDDH review of the implementation of Recommendation (2021)¹, this moment provides an opportunity to: clarify the conceptual distinction between Ombudsman institutions and NHRIs; recognize and better understand the specificities of hybrid institutions; reinforce the importance of compliance with the Paris Principles across all institutional models; support coordinated and complementary mandates where institutions are separate; facilitate exchange where mandates are combined; and consider opportunities for accredited NHRIs to engage in a more structured manner within relevant Council of Europe processes — all in ways that strengthen international standards and institutional independence.”

In conclusion, as both an NHRI and an Ombudsman institution, the Public Defender of Georgia has seen how these mandates can reinforce and strengthen one another when the principles of independence, clarity, pluralism and adequate resources are fully respected. GANHRI remains committed to working closely with the Council of Europe, ENNHRI and OHCHR to ensure that every NHRI in the region is independent, credible and effective.

Thank you very much for your attention, and I look forward to our discussion.

Vladien STEFANOV

Chief, National Institutions and Regional Mechanisms Section, Global Operations Division, Office of the United Nations High Commissioner for Human Rights (OHCHR) / *Chef de la Section des institutions nationales et des mécanismes régionaux, Division des opérations mondiales, Haut-Commissariat des Nations unies aux droits de l'homme (OHCHR)*

I thank the CDDH Secretariat for engaging the UN Human Rights Office in the review of the implementation of the Committee of Ministers' Recommendations on Ombudsman Institutions and National Human Rights Institutions.

The cooperation between the Council of Europe and the UN Human Rights Office is fruitful and long-lasting, including on these two guiding documents. I recall my participation, in March 2020, at the 6th meeting of the CDDH-INST drafting group on civil society and NHRIs at which I introduced the contribution by the UN Human Rights Office to the discussion on the draft recommendation on NHRIs.

Another very good example of cooperation between our organizations was the drafting of the Venice Principles on the protection and promotion of the Ombudsman Institutions. I also recall our participation in the working group on the draft at the meeting in Paris in October 2018, as well as at the adoption of the Venice Principles in March 2019.

The Paris Principles for NHRIs, which are now considered a minimum standard for independence and effectiveness, were endorsed by the UN General Assembly. In the 32 years since then, a lot was done to build on this foundation, including the adoption of the two recommendations under review at this seminar.

These recommendations refer to the Paris Principles but also develop them. It is therefore important to do the review of their implementation. We note the excellent work already done by ENNHRI in following up to the recommendation with the baseline study on the implementation in all 46 Council of Europe Member States.

Today, I would like to focus on two main points:

1. There is a vast diversity of state entities around the world that are vested with a human rights-related mandate: national human rights commissions, ombudsman offices, national councils, institutes, committees, etc. The choice of the format is a sovereign decision of our Member-States, and it does not affect the core substance of the work of these bodies. The key question in every country situation is: are these bodies independent, pluralistic and efficient in promoting and protecting human rights, irrespective of their structure and format?
2. A number of global and regional intergovernmental human rights organizations have acknowledged that NHRIs are an independent and authoritative source of information that complements the report received from the government. Therefore, they have provided NHRIs with speaking and other participatory rights, independent from their government delegations. Would the CE be interested to consider developing its working methods and rules of procedure along the examples from other regional intergovernmental actors?

Independent, pluralistic bodies, which are efficient in promoting and protecting human rights, irrespective of their structure and format

It is very important that all right-holders in our Member-States, especially the most vulnerable, have an easier and simplified access to their national and local human rights protection and promotion systems, including to Ombudsman Institutions and National Human Rights Institutions, where they exist. This means to ensure to those who cannot afford professional legal aid or are not knowledgeable about complex institutional mechanisms, to have one entry point to such mechanisms in their search for the help they need.

It is with this in mind that we attach a great importance to the requirement in the Paris Principles for the NHRIs to be vested with a broad mandate covering the entire range of human rights for all. Such a broad mandate ensures one entry point for right-holders to submit their complaints which will then be internally handled to reach the unit that is responsible for the specific thematic area of the individual case.

It is important to bear in mind that the Paris Principles and the General Observations of the Sub-Committee on Accreditation of the Global Alliance of NHRIs are referred to in the CM recommendations 1 and 4.

Thus, if we take the Ombudsman, among the other various forms of human rights institutions, its mandate needs to be as broad as possible for it to be able to properly promote and protect all human rights. It should be able to cover areas beyond the public sector where there are important issues related to economic, social and cultural rights, for instance. Currently, there are 33 A-status Ombudsman institutions globally with such a broad mandate, including 18 A-status Ombudsman institutions in CE Member-States. In addition, there are 12 B-status Ombudsman institutions globally, including 4 B-status Ombudsman institutions in CE Member-States. In total, we can say that globally there are 45 Ombudsman institutions that are also NHRIs, including 22 in the CE Member-States. It is important to point out here that when an Ombudsman institution is accredited with A status and thus becomes a NHRI, it does not cease to be an Ombudsman institution. Accreditation does not affect the structure and management processes; it is an acknowledgement of independence and efficiency.

A number of global and regional intergovernmental human rights organizations have provided NHRIs, including many Ombudsman institutions, with speaking and other participatory rights, independent from their government delegations.

There is a number of benefits to the institutionalized participation of NHRIs in international human rights mechanisms:

1. NHRIs provide valuable information from the ground. Many international human rights mechanisms are based in HQ locations and rely on information from reliable national actors like NHRIs.
2. NHRIs are instrumental in supporting follow-up activities on recommendations by the international human rights mechanisms on the national level. This includes raising awareness of recommendations at the national level, encouraging their implementation, and monitoring the follow-up activities by the State.
3. NHRIs provide feedback and assessments on such follow-up activities undertaken at the national level, thus acting as a bridge between the national to international levels.

The UN Human Rights Office facilitates the interaction of NHRIs, including a number of Ombudsman institutions, with the UN human rights system based on the accreditation status of NHRIs. Only once NHRIs are assessed as being in full compliance with the Paris Principles, can they take full advantage of these engagement opportunities.

For instance, NHRIs engaged with the UN Human Rights Council through written and oral statements during HRC thematic and country debates. At the 3 HRC sessions this year, 147 such statements were delivered by 56 NHRIs, of which 14 NHRIs and Ombudsman institutions came from CE Member-States.

There are also several regional mechanisms that have institutionalized entry points and interaction opportunities for NHRIs.

Since 1998, the African Commission on Human and Peoples' Rights ACHPR has granted NHRIs Affiliate Status, which is the Commission's formal accreditation system.

Rights and entry points include:

- Participation in public sessions of the Commission.
- Delivering oral and written interventions during sessions separately from their government delegations.
- Submission of activity reports to the Commission.
- Direct communication with Special Rapporteurs, Working Groups, and Special Mechanisms.

NHRIs with affiliate status can also:

- Submit "shadow reports" and independent thematic briefs.
- Address the Commission during the examination of a State's periodic report.
- Provide follow-up information on implementation of ACHPR recommendations.

The Inter-American Commission on Human Rights (IACHR) has provided NHRIs with participatory rights in its Public Hearings and Briefings. NHRIs may:

- participate in public hearings on country situations or thematic issues.
- Provide testimony, documentation, and policy recommendations.
- Join private working meetings convened by the IACHR between States and civil society.

In conclusion, and in line with the examples that I mentioned, we would appreciate it if the recommendations of this seminar include the suggestion to the Committee of Ministers to consider including provisions in the rules and working methods on the CE bodies allowing NHRIs from the Member-States to participate in their own capacity, independently from their government delegations. In this way NHRIs, including Ombudsman institutions, will be able to bring their independent and authoritative contribution to the work of CE bodies, as public bodies, yet independent from the Government.

Thank you for your attention.

CLOSING REMARKS

ALLOCUTION DE CLÔTURE

Krista OINONEN

Chairperson of the Steering Committee for Human Rights /
Présidente du Comité directeur pour les droits humains (CDDH)

Distinguished colleagues, dear participants,

As we come to the close of this workshop, allow me to offer a few final reflections.

Today's discussions have shown once again that the strength of our democratic systems is inseparable from the strength of the institutions that safeguard them. Whether through the careful, human-centered work of Ombudspersons, or the broad, forward-looking mandates of National Human Rights Institutions, these bodies form part of the quiet architecture that holds our democratic life together.

We have heard thoughtful analyses, candid reflections, and concrete examples of implementation—examples that highlight both progress and challenges. What emerges clearly is that the Committee of Ministers' Recommendations are not static texts but living commitments, evolving with the realities our institutions face. Their implementation requires attention, resources, and political will; but above all, it requires the shared conviction that independent oversight is not a luxury—it is a democratic necessity.

I want to express my sincere gratitude to all our speakers, to our panelists, and to everyone who contributed to today's exchanges. Your expertise and your openness have brought real depth to our conversation.

I also wish to thank Clare Ovey, our colleagues from the Secretariat, and all who worked behind the scenes to make this event possible—both here at the Agora and online throughout Europe.

And finally, let me thank each of you for your engagement: your questions, your reflections, and your willingness to take part in this collective effort. The work of Ombudspersons and NHRIs depends on collaboration—not only within States, but across borders, across institutions and across professional cultures. Today has been a testament to that spirit.

As we move forward, may we carry with us what today has reaffirmed: that independent, principled, and accessible institutions are indispensable to Europe's democratic future, and that their protection and strengthening is, in the fullest sense, a shared responsibility.

With that, I thank you once again for your participation.

This workshop is now formally closed.

Ombudsperson institutions and NHRIs are crucial elements of a state's human rights and democratic architecture. Ensuring that they operate independently, effectively and in line with international standards is critical to ensuring respect for human rights.

In his keynote speech for the CDDH Workshop, Michael O'Flaherty, Council of Europe Commissioner for Human Rights, perfectly encapsulated the importance of the CDDH's examination of implementation of the Committee of Ministers' recommendations on Ombudsperson institutions and national human rights institutions and other international standards – recommendations that the CDDH itself had drafted.

The Workshop brought together representatives of global, regional, and national bodies to share information and insights on the legal and institutional frameworks for protecting and promoting these institutions and on the challenges that they face, including threats to their independence and resources that are incommensurate to their mandates.

The results of the Workshop will contribute to the CDDH's preparation of a report on its examination of implementation of the Committee of Ministers recommendations, due to be adopted in 2026.

Les institutions de l'Ombudsman et les institutions nationales des droits humains constituent des éléments essentiels de l'architecture démocratique et des droits humains d'un État. Il est primordial de s'assurer qu'elles fonctionnent de manière indépendante, efficace et conforme aux normes internationales afin de garantir le respect des droits humains.

Dans son discours liminaire délivré lors de l'Atelier du CDDH, Michael O'Flaherty, Commissaire aux droits de l'homme du Conseil de l'Europe, a parfaitement résumé l'importance de l'examen par le CDDH de la mise en œuvre des recommandations du Comité des Ministres concernant les institutions de l'Ombudsman et les institutions nationales des droits humains, ainsi que d'autres normes internationales – recommandations que le CDDH avait lui-même élaborées.

L'Atelier a réuni des représentants d'instances mondiales, régionales et nationales afin de partager des informations et des aperçus sur les cadres juridiques et institutionnels visant à protéger et à promouvoir ces institutions, ainsi que sur les défis auxquels elles sont confrontées, notamment les menaces pesant sur leur indépendance et les ressources insuffisantes pour répondre à leurs mandats.

Les résultats de l'Atelier contribueront à l'élaboration par le CDDH d'un rapport sur son examen de la mise en œuvre des recommandations du Comité des Ministres, qui devrait être adopté en 2026.

The Council of Europe is the continent's leading human rights organisation. It comprises 46 member states, including all members of the European Union. All Council of Europe member states have signed up to the European Convention on Human Rights, a treaty designed to protect human rights, democracy and the rule of law. The European Court of Human Rights oversees the implementation of the Convention in the member states.

Le Conseil de l'Europe est la principale organisation de défense des droits humains du continent. Il comprend 46 États membres, dont l'ensemble des membres de l'Union européenne. Tous les États membres du Conseil de l'Europe ont signé la Convention européenne des droits de l'homme, un traité visant à protéger les droits humains, la démocratie et l'État de droit. La Cour européenne des droits de l'homme contrôle la mise en œuvre de la Convention dans les États membres.

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