

FOCUSED SHADOW REPORT

Roma Women and Access to Protection from Violence in Poland

Submission to GREVIO for the first thematic evaluation round: Building trust by delivering support, protection and justice

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Key concern. Poland's state report increasingly uses the language of intersectionality, but it does not make Roma women visible as a distinct group. General assurances of non-discriminatory access are not accompanied by evidence showing whether Roma women can reach services, receive appropriate protection, or participate in shaping the policies intended to protect them.

1. Purpose and scope

Fundacja W Stronę Dialogu submits these observations in response to Poland's state report GREVIO/Inf(2026)6. This is a focused contribution concerning the position of Roma women in the implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence. It does not seek to provide a comprehensive assessment of every form of violence or every element of the Polish protection system.

The concerns raised below are particularly relevant to Articles 4(3), 9, 11, 18, 20 and 22 of the Istanbul Convention, concerning non-discrimination, cooperation with civil society, data and research, and access to general and specialist support.

We welcome the report's recognition that violence and access to protection may be shaped by multiple and intersecting forms of inequality. We also welcome the inclusion of age, migration, disability, sexual orientation, social status and experiences of multiple discrimination in updated risk-assessment questionnaires, as well as the stated expansion of support mechanisms for women from ethnic minorities. (*State report, pp. 19-20*)

At the same time, the category 'women from ethnic minorities' remains too broad to establish whether the specific barriers encountered by Roma women are recognised and effectively addressed. Roma women are not a homogeneous group: age, disability, place of residence, socio-economic position, nationality and migration or displacement status may all affect their experiences and their ability to seek help. An intersectional approach should make these differences visible without stereotyping Roma communities or treating Roma identity itself as a risk factor.

2. Formal equality does not ensure effective access

The state report states that access to support for victims of domestic violence is non-discriminatory and lists psychological, medical, legal and social counselling, crisis intervention, safe accommodation and protection under the Blue Card procedure among the available measures. (*State report, p. 19*)

Formal entitlement, however, does not by itself demonstrate equal access in practice. Roma women may encounter intersecting barriers related to antigypsyism, poverty and social exclusion, limited access to information, previous discriminatory treatment and consequent lack of trust in public institutions. These barriers may affect whether violence is reported, whether protection is

sought in time, and whether legal, psychological, social or shelter services are used and continued.

This issue is particularly important because the state report confirms that the Polish free legal-aid system has no dedicated support centres for migrant women and girls or for women and girls belonging to national or ethnic minorities who experience violence. (*State report, p. 69*)

Dedicated ethnicity-based services are not the only possible response, nor should they replace universal public services. Their absence does, however, place a clear responsibility on mainstream services to show that they are genuinely accessible, non-discriminatory and responsive to Roma women's circumstances. Accessibility should be assessed in terms of actual use, safety, continuity of support and outcomes, not only the formal availability of a service.

3. The data gap creates institutional invisibility

The report describes the planned digitalisation of the Blue Card procedure and improvements to administrative data. The future system is intended to provide data disaggregated by sex, age, type of violence, territorial unit and the relationship between victim and perpetrator. It also refers to a forthcoming nationwide survey on violence against women. (*State report, pp. 17-19 and 28*)

These are important developments, but the proposed categories will still not make it possible to assess whether Roma women are reaching protection and support. The report provides detailed figures for the Victim Support Network, including the sex and age of beneficiaries and the number of women supported in domestic-violence and sexual-violence cases. Yet the figures do not show whether Roma women use these services, what barriers they encounter, whether they remain engaged with support, or what follows from the intervention. The report also notes that data collected by the Victim Helpline in 2023 were not broken down by gender, nationality or age. (*State report, pp. 26-28 and 73*)

We recognise that information concerning ethnic origin is sensitive and that poorly designed data collection may expose Roma women to identification, stigma or misuse. We therefore do not recommend mandatory disclosure of ethnicity in the Blue Card procedure or the attribution of ethnicity by public officials. Any collection of equality data should be based on voluntary self-identification, a clear and limited purpose, informed consent where applicable, data minimisation, strict access controls and public explanation of how the information will be protected and used. Ethnicity must never be inferred from appearance, surname, address or an official's perception.

Administrative data should be complemented by independent qualitative and quantitative research designed with Roma women and Roma organisations. This may include anonymous service-access surveys, participatory research, interviews, local service mapping and analysis of pathways through protection systems. The planned nationwide survey and the research module described by the Polish authorities offer an immediate opportunity to include Roma women safely and meaningfully. Without such evidence, Roma women risk remaining statistically and institutionally invisible.

4. Participation must go beyond general NGO consultation

The state report refers to cooperation with civil society and to the important role of non-governmental organisations in delivering victim-support services. It does not, however, provide enough information to establish whether Roma women's organisations, Roma-led organisations or Roma experts have been systematically involved in designing, implementing and evaluating policies, risk-assessment tools, training programmes or support mechanisms. (*State report, pp. 19 and 26-27*)

Meaningful participation requires involvement before priorities and tools have been fixed. Roma women and Roma organisations should help define the questions, identify barriers, test procedures, interpret findings and evaluate outcomes. Their expertise should be recognised and remunerated. Authorities should also explain which organisations were involved, at what stage, how participants were selected and how their input changed the resulting policy or service. This is essential both for relevance and for building trust.

5. Professional capacity and trust

The state report mentions training for police and Border Guard officers on multiple discrimination and on women from minority groups. It does not specify whether such training addresses antigypsyism or the situation of Roma women, whether Roma experts participate in its design or delivery, or whether its impact on professional practice is evaluated. (*State report, pp. 20 and 34*)

Training for police officers, social workers, healthcare professionals, legal-aid providers, shelter staff and members of interdisciplinary teams should therefore address institutional antigypsyism, intersectional discrimination, trauma-informed communication, confidentiality and the practical barriers to seeking support. Cultural sensitivity must not become culturalisation: violence must not be explained away as a feature of Roma culture, and assumptions about Roma families or communities must never replace an individual assessment of a woman's safety, wishes and rights.

6. Questions and priority actions for GREVIO to pursue

We respectfully encourage GREVIO to ask the Polish authorities to provide concrete information and evidence on the following:

- **Roma-specific implementation-** what measures within national and local strategies explicitly identify and address the barriers faced by Roma women experiencing violence?
- **Effective access and outcomes-** how is the accessibility, quality and effectiveness of legal, psychological, medical, social and shelter services for Roma women assessed, including continuity of support and outcomes after intervention?
- **Participation-** which Roma women's organizations, Roma-led organizations and Roma experts have participated in policy design, implementation, training and evaluation; at what stages; and with what effect on decisions?
- **Professional training-** do initial and in-service training programs for relevant professional's address antigypsyism, intersectional discrimination and the specific barriers faced by Roma women, and is their impact on practice independently evaluated?
- **Research and equality data-** how will the forthcoming nationwide survey and research module include Roma women, and what safeguards will ensure voluntary self-identification, confidentiality, data minimisation and protection from stigmatisation or misuse?
- **Monitoring discrimination-** what mechanisms allow Roma women to report discriminatory treatment by protection and support services, and how are such complaints investigated, remedied and used to improve institutional practice?
- **Sustainable partnerships-** what funding and institutional arrangements support sustained cooperation with Roma-led civil society, including fair remuneration for Roma women's expertise?

Conclusion

The explicit inclusion of Roma women in Poland's implementation of the Istanbul Convention would strengthen the emerging intersectional approach described in the state report. It would also help ensure that equal access exists not only in law, but in the lived reality of women seeking safety and support. The key test is whether systems can identify unequal access, respond to it with Roma women rather than for them, and demonstrate that protection is effective in practice.

Source

Republic of Poland, Report on the implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence by Poland, 1st thematic evaluation round: Building trust by delivering support, protection and justice, GREVIO/Inf(2026)6, received by GREVIO on 3 August 2026.