



REPUBLIC OF SLOVENIA  
ADVOCATE OF THE PRINCIPLE OF EQUALITY

# 2025

**Annual Report**  
SELECTED CHAPTERS





REPUBLIC OF SLOVENIA  
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# ANNUAL REPORT 2025

Selected Chapters

Ljubljana, February 2026



## **Foreword by the Head of the Advocate of the Principle of Equality**

This is the 10th Annual Report of the Advocate of the Principle of Equality. The Advocate is an independent state authority for protection against discrimination, established in 2016 in the Republic of Slovenia by law in accordance with the requirements of European Union directives. These directives require every Member State to establish an effective and independent body responsible for protection against discrimination.

The Advocate is an institution that provides support and assistance to individuals when, in everyday life, they face harassment, discrimination or unequal treatment. We listen to everyone. We help people who turn to us understand their experiences from a legal perspective, and inform them of the options available for addressing and remedying injustices. In the past year alone, we provided independent assistance to nearly 600 people and delivered 2,350 hours of advisory support.

When justified, we initiate discrimination investigation procedures (76 such procedures were initiated last year). In numerous cases, perpetrators rectify irregularities during the course of the procedure. Where this is not the case, we refer the matter to the competent inspection authorities (four cases last year). In particularly significant cases, we also provide support and representation to victims in court proceedings (three cases last year).

However, our work extends beyond the handling of individual cases. When discrimination arises from regulations, we propose amendments or lodge a request for constitutional review. Through research and reporting, we raise awareness, and through systematic education of various groups, we promote the importance of equal treatment and protection against discrimination.

Those who approach our institution receive not only legal information, but also understanding, support and clear guidance for the future. Their trust means a great deal to us and binds us to conduct our work with dedication, impartiality and professionalism.

The year 2026 marks a period of important changes at the European level. New European Union directives set common standards for the operation of equality bodies across Europe. Slovenia will need to update its legal framework accordingly to ensure that all residents of our country enjoy the same level of protection as in other developed European countries. The deadline for transposing these standards into national legislation is June 2026, placing a substantial responsibility on the legislature.

October 2026 will mark ten years since the Advocate was established. At the end of this period, my second term as Head of the Advocate will come to an end. I hope that the new leadership will continue to develop the institution and strengthen its role in Slovenia.

I would like to take this opportunity to sincerely thank all my colleagues for their dedicated, professional and wholehearted work. My thanks also go to those who have cooperated with us over the years – representatives of politics, the business sector, public administration, education, healthcare, social welfare and civil society.

The contribution of civil society to the protection of human rights is invaluable. Non-governmental organisations are a key source of information on the situation of vulnerable groups; accordingly, European standards and Council of Europe recommendations emphasise the importance of involving them in decision-making and policy-making processes related to protection against discrimination.

I thank everyone who believes in human rights and in the role of independent bodies entrusted with ensuring their implementation. The values of equality, equal treatment and equal opportunities do not come to life on their own. We must pursue them constantly and consistently.

Miha Lobnik  
ADVOCATE OF THE PRINCIPLE OF EQUALITY

Ljubljana, February 2026

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# 1 LEGAL BASES AND OPERATIONS OF THE ADVOCATE

Protection against discrimination is one of the fundamental human rights enshrined in Article 14 of the Constitution of the Republic of Slovenia<sup>1</sup> (the Constitution). On 21 April 2016, the National Assembly of the Republic of Slovenia (the National Assembly) adopted the Protection against Discrimination Act (the ZVarD)<sup>2</sup>, which entered into force on 24 May 2016. Pursuant to the ZVarD, a new independent state authority specialising in the field of discrimination was established: the Advocate of the Principle of Equality (the Advocate).

In accordance with the EU acquis, the Advocate performs tasks of the national equality body. In this way, Slovenia ensures the implementation of Articles 15, 21, 23 and 39 of the Charter of Fundamental Rights of the European Union, as well as compliance with the following Directives and Regulation:

1. Council Directive 2000/43/EC of 29 June 2000 implementing the principle of equal treatment between persons irrespective of racial or ethnic origin;
2. Council Directive 2000/78/EC of 27 November 2000 establishing a general framework for equal treatment in employment and occupation;
3. Council Directive 2004/113/EC of 13 December 2004 implementing the principle of equal treatment between men and women in the access to and supply of goods and services;
4. Directive 2006/54/EC of the European Parliament and of the Council of 5 July 2006 on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation (recast);
5. Directive 2014/54/EU of the European Parliament and of the Council of 16 April 2014 on measures facilitating the exercise of rights conferred on workers in the context of freedom of movement for workers;
6. Directive (EU) 2022/2381 of the European Parliament and of the Council of 23 November 2022 on improving the gender balance among directors of listed companies and related measures;
7. Directive (EU) 2023/970 of the European Parliament and of the Council of 10 May 2023 to strengthen the application of the principle of equal pay for equal work or work of equal value between men and women through pay transparency and enforcement mechanisms;
8. Council Directive (EU) 2024/1499 of 7 May 2024 on standards for equality bodies in the field of equal treatment between persons irrespective of their racial or ethnic origin, equal treatment in matters of employment and occupation between persons irrespective of their religion or belief, disability, age or sexual orientation, equal treatment between women and men in matters of social security and in the access to and supply of goods and services, and amending Directives 2000/43/EC and 2004/113/EC;
9. Directive (EU) 2024/1500 of the European Parliament and of the Council of 14 May 2024 on standards for equality bodies in the field of equal treatment and equal opportunities between women and men in matters of employment and occupation, and amending Directives 2006/54/EC and 2010/41/EU;

<sup>1</sup> Official Gazette of the Republic of Slovenia [Uradni list RS], Nos 33/91-I, 42/97 – UZS68, 66/00 – UZ80, 24/03 – UZ3a, 47, 68, 69/04 – UZ14, 69/04 – UZ43, 69/04 – UZ50, 68/06 – UZ121, 140, 143, 47/13 – UZ148, 47/13 – UZ90, 97, 99 in 75/16 – UZ70a.

<sup>2</sup> Official Gazette of the Republic of Slovenia [Uradni list RS], Nos 33/16 and 21/18 – ZNOrg.

10. Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act).

## Operations of the Advocate

In November 2023, following the adoption of the 2024 and 2025 budgets, the National Assembly allocated EUR 1,604,627 for the Advocate for 2025.

In July 2024, the Government of the Republic of Slovenia (the Government) earmarked EUR 1,800,000 for the Advocate in the draft 2025 budget.

In August 2024, the Advocate submitted a proposal to the Government requesting additional funding of EUR 178,520 for 2025, to ensure the smooth operation of the Advocate and the performance of all tasks prescribed by law. The Government did not accept the proposal.

On 20 November 2024, the National Assembly approved the Government's proposal, under which the Advocate's adopted budget for 2025 amounted to EUR 1,799,605.

**Table: Expenditure of the Advocate's integrated budget funds in 2025 (in euros)**

	<b>Adopted budget (P1)</b>	<b>Current budget (P3)</b>	<b>Signed payment orders (O1)</b>	<b>Remaining funds per budget item</b>	<b>Expenditure %</b>
Budget item: 170001 – Salaries	1,399,420.00	1,397,758.81	1,396,232.77	1,526.04	<b>99.89</b>
Budget item: 170002 – Material costs	318,600.00	264,766.45	257,580.61	7,185.84	<b>97.74</b>
Budget item: 170003 – Research and awareness-raising	45,585.00	95,022.16	93,942.11	1,080.05	<b>97.63</b>
Budget item: 180001 – Investments and major maintenance	30,000.00	32,100.00	32,095.32	4.68	<b>99.98</b>
Budget item: 180002 – Education	6,000.00	5,296.39	5,296.39	0.00	<b>100.00</b>
<b>TOTAL</b>	<b>1,799,605.00</b>	<b>1,794,943.81</b>	<b>1,785,147.20</b>	<b>9,796.61</b>	<b>99.46</b>

**The expenditure of the Advocate's integrated budget funds for 2025 amounted to 99.46% (EUR 1,785,147 of EUR 1,794,944).**

In the 2025 budget year, the Advocate used EUR 1,785,147 of integrated budget funds to carry out its statutory tasks. Of this amount, EUR 1,396,232 was allocated for personnel, EUR 257,580 for material costs, EUR 93,942 for research and awareness-raising, EUR 32,095 for investments and major maintenance, and EUR 5,296 for the training of the Advocate's public employees.

## 2 ACTIVITIES OF THE EQUALITY BODY

### **Key functions of the Advocate**

The three key functions of equality bodies are set out in the European Commission's Recommendations on Standards for Equality Bodies (June 2018) and the Council of Europe's General Policy Recommendations on Equality Bodies to combat racism and intolerance at national level (February 2018). The Advocate also adheres to these recommendations.

### **Providing information, advisory activities and advocacy**

The Advocate provides independent assistance and support to individuals who have experienced discrimination, performs advisory activities, and participates in certain selected court proceedings. In addition, Article 38 of the ZVarD empowers the Advocate to initiate proceedings before the Constitutional Court to assess constitutionality and legality.

### **Receiving complaints and discrimination identification**

The Advocate investigates discrimination in individual cases, assessing or deciding whether discrimination occurred in a particular case (these procedures are conducted as special administrative procedures and conclude with a declaratory decision).

### **Research, monitoring, making recommendations, and awareness-raising initiatives**

The Advocate also engages in systemic work, including researching and analysing the state of discrimination at the national level, and on this basis draws up independent reports, recommendations and proposals for specific measures. Systemic tasks also include: monitoring the general situation, raising awareness, providing education, exchanging available information within the European Union and other forms of international cooperation.

## 2.1 Overview of the implementation of tasks and activities under Article 21 of the ZVarD

### Indent one of Article 21 of the ZVarD

**Conducting independent surveys on the situation of persons with a certain personal ground, particularly gender, nationality, race or ethnic origin, religion or belief, disability, age and sexual orientation and other issues relating to discrimination of people with a certain personal ground**

Question	How many and which independent surveys were conducted in 2025?
Answer	<b>In 2025, the Advocate conducted one independent survey and one analysis.</b>
Explanation	<p>In 2025, the Advocate conducted <b>one independent survey</b>:</p> <ol style="list-style-type: none"> <li>1. A public opinion survey on discrimination in Slovenia in 2025.</li> </ol> <p>In 2025, the Advocate conducted <b>one analysis</b>:</p> <ol style="list-style-type: none"> <li>1. A review of the 2024 Annual Report of the Human Rights Ombudsman by personal grounds, from the perspective of the competences of the Advocate of the Principle of Equality</li> </ol>
Implementation	This activity was carried out by Department A <sup>3</sup> in coordination with the Office <sup>4</sup> .

<sup>3</sup> Department A – Department for Systemic Monitoring, Awareness-Raising and Prevention of Discrimination

<sup>4</sup> Office – Advocate's Office.

**Indent two of Article 21 of the ZVarD**

**Publishing independent reports and making recommendations to state authorities, local communities, holders of public authority, employers, economic operators and other entities regarding the established situation of persons with a certain personal ground, namely with regard to the prevention and elimination of discrimination and the adoption of specific and other measures to eliminate discrimination;**

Question	How many independent reports were produced (published) in 2025?
<b>Answer</b>	<b>In 2025, the Advocate produced and published two independent reports.</b>
Explanation	In 2025, the Advocate produced and published the 2024 Regular Annual Report and a special report entitled Challenges in the Education of Roma Children and Youth.
Implementation	This activity was carried out by the Office and Departments A and B in coordination with the Head of the Advocate. <sup>5</sup>

Question	How many recommendations were issued (and to whom) regarding the situation of persons with a certain personal ground (which one) in relation to the prevention and elimination of discrimination in 2025?
<b>Answer</b>	<b>In 2025, the Advocate issued 119 recommendations.</b>
Explanation	<p>The Advocate issued 119 recommendations, of which:</p> <ul style="list-style-type: none"> <li>– 86 concerned proposed laws and other regulations,</li> <li>– 4 concerned laws and other regulations in force, and</li> <li>– 29 were aimed at promoting equal treatment.</li> </ul> <p>Of these, 32 recommendations were submitted to the National Assembly, two to the Government, 73 to various ministries, 13 to various public law entities and one recommendation to private law entities.</p> <p>The recommendations addressed the following personal grounds: disability (36), race, nationality, or ethnic origin (26), age (13), religion (7) and financial status (5); two recommendations each concerned the following personal grounds: gender, language, parenthood or pregnancy, health status and marital status, while one recommendation each concerned the following personal grounds: sexual orientation, education, place of residence and citizenship.</p> <p>The highest number of recommendations was issued in the areas of goods and services (59), education (31), social rights (7) and labour and employment (2).</p> <p>Of the 119 recommendations issued by the Advocate in 2025, a total of 17 were acted upon by the end of 2025.</p>
Implementation	This activity was carried out by Departments A and B in coordination with the Head and the Office.

<sup>5</sup> Department B – Department for Discrimination Investigation, Advisory and Advocacy.

**Indent three of Article 21 of the ZVarD**

**Performing the tasks of inspection supervision on the basis of the complaints referred to in Chapter 5 of the ZVarD with regard to compliance with the provisions of this or another Act laying down the Advocate's competences;**

Question	How many complaints under Chapter 5 of the ZVarD did the Advocate handle and conclude in 2025?
<b>Answer</b>	<b>In 2025, the Advocate concluded the examination of 76 complaint procedures.</b>
Explanation	<p>In 2025, the Advocate concluded the examination of 76 complaints.</p> <p>Of the cases handled, 31 were concluded with a substantive decision and 34 with a procedural decision. In nine cases, the Advocate did not initiate a procedure; in two cases, one procedure was reclassified as an assessment of discriminativeness of regulations and the other as an advisory case.</p> <p>In 13 cases concluded by the Advocate with a decision, discrimination was found. In six cases concluded by the Advocate with a decision, discrimination was not found, while in 12 cases, a decision of rejection was issued.</p> <p>In 2025, the Advocate recommended that the competent authorities conduct an inspection or initiate minor offence proceedings in four cases.</p> <p>In 2025, the Administrative Court ruled on seven cases concerning the decisions of the Advocate.</p> <p>As at 31 December 2025, 13 administrative disputes remained pending before the Administrative Court, in which the parties contested decisions issued by the Advocate.</p>
Implementation	This activity was carried out by Department B in coordination with the Head and the Office.

**Indent four of Article 21 of the ZVarD****Providing independent assistance to discriminated persons when asserting their rights to protection against discrimination in the form of advisory and legal assistance to parties in other administrative and judicial proceedings related to discrimination**

Question	How many discriminated persons were provided with independent assistance in 2025, in the form of advisory and legal assistance in administrative procedures and other judicial proceedings related to discrimination?
<b>Answer</b>	<b>In 2025, the Advocate provided independent assistance to over 580 individuals.</b>
Explanation	In 2025, the Advocate provided approximately 2,350 hours of advisory support. Advisory and legal assistance were provided to over 580 individuals.  In 2025, the Advocate conducted a total of 588 individual consultations and instances of legal assistance, of which 323 were provided in writing and 265 by telephone.
Implementation	This activity was carried out by Departments A and B in coordination with the Head and the Office.

**Indent five of Article 21 of the ZVarD****Raising the awareness of the general public regarding discrimination and measures to prevent it**

Question	How was the general public made aware of discrimination and measures for its prevention in 2025?
Answer	<b>In accordance with international recommendations, the Advocate defined communication objectives, priority target groups, key messages and various communication channels. Awareness-raising activities were carried out throughout the year.</b>
Explanation	<p>In 2025, the Advocate continued to carry out activities aimed at increasing the visibility of the equality body and promoting protection against discrimination among the general public and within the public administration.</p> <p>The Advocate issued 46 press releases and received and responded to 41 inquiries from journalists. The Head of the Advocate appeared in the media on 24 occasions.</p> <p>In cooperation with the Center for Comparative Equality and Anti-Discrimination Law at the University of California, Berkeley School of Law (the Center) and the Faculty of Law, University of Ljubljana, the Advocate organised a three-day international conference on anti-discrimination law.</p> <p>It organised 17 educational activities and training sessions with a total of more than 750 participants from various target groups across Slovenia (and abroad). Through presentations, interventions, and active participation in fairs and festival events, the Advocate raised awareness among specific audiences at a minimum of 11 events.</p> <p>The Advocate published its Regular Annual Report for 2024 (250 copies), a special report entitled Challenges in the Education of Roma Children and Youth (250 copies), and an online publication entitled The Development of the Advocate of the Principle of Equality, the Slovenian Equality Body.</p> <p>The Advocate actively cooperated with more than 70 civil society organisations. Forms of cooperation included: requests for the compiling of studies, analyses and special reports; the Advocate's responses to enquiries from civil society organisations; meetings with civil society organisations; information and awareness-raising activities; educational activities; and letters of support for civil society organisations' projects.</p> <p>The Advocate informs the public about all its activities through its website, YouTube channel (@zagovornik) and social media.</p> <p>In 2025, it published 51 news items related to its work on its website <a href="http://www.zagovornik.si">www.zagovornik.si</a> and launched an institutional podcast, releasing 13 episodes in the same year.</p>
Implementation	This activity was carried out by Department A in coordination with the Head and the Office.

**Indent six of Article 21 of the ZVarD****Monitoring the overall situation in the Republic of Slovenia in the field of protection against discrimination and the situation of persons with certain personal grounds**

Question	How was the overall situation regarding protection against discrimination and the status of persons with certain personal grounds monitored in 2025?
Answer	<b>In 2025, the Advocate monitored the situation in the field of protection against discrimination through enquiries involving more than 155 different legal entities.</b>
Explanation	<p>In 2025, the Advocate called on 19 ministries, three government offices and the General Police Administration to report on the specific measures they adopted and implemented.</p> <p>The Advocate also called on 32 inspection bodies, the Police, the Supreme State Prosecutor's Office, the Ministry of Justice and 22 courts to report on cases of discrimination they had handled in 2025.</p> <p>Through various enquiries, the Advocate additionally monitored the situation regarding protection against discrimination at eight non-governmental organisations, five ministries and seven municipalities, 55 administrative units, two healthcare chambers and two professional institutions in the field of spatial planning.</p>
Implementation	This activity was carried out by Departments A and B in coordination with the Head and the Office.

**Indent seven of Article 21 of the ZVarD****Proposing the adoption of special measures to improve the situation of persons who are disadvantaged on the basis of a certain personal ground**

Question	Which special measures were proposed for adoption in 2025 to improve the situation of persons disadvantaged on the basis of a certain personal ground?
<b>Answer</b>	<b>In 2025, the Advocate issued 119 recommendations, 12 of which included proposals for special measures to eliminate discrimination.</b>
Explanation	<p>Proposals for special measures to improve the situation of disadvantaged persons were based on the following personal grounds: disability, nationality, financial status, and race and ethnicity.</p> <p>The proposed special measures were:</p> <ol style="list-style-type: none"> <li>1. Recommendation to the Ministry of Education, Science and Sport (MVZI) to establish the right to preferential treatment in the admissions process where enrolment quotas apply for candidates with special needs and special status.</li> <li>2. Recommendation to the MVZI to include, in accordance with Article 62a of the Constitution, care for the development of the language of the deafblind among tasks of national importance, alongside Slovenian sign language.</li> <li>3. Recommendation to the Ministry of a Solidarity-Based Future (MSP) to expand the category of beneficiaries entitled to public housing, in accordance with Directive 2003/109/EC concerning the status of third-country nationals who are long-term residents.</li> <li>4. Recommendation to the Ministry of Labour, Family, Social Affairs and Equal Opportunities (MDDSZ) to permit the granting of state scholarships to upper secondary students enrolled in a matura examination course, provided they meet the social criteria for scholarship eligibility.</li> <li>5. Recommendation to the MDDSZ to introduce a targeted scholarship scheme for Roma pupils, upper secondary students, and university students.</li> <li>6. Recommendation to the MDDSZ regarding the development of support programmes for career guidance of young Roma in secondary education, to facilitate their acquisition of job skills and integration into the labour market.</li> <li>7. Recommendation to the Ministry of Education (MVI) to provide all Roma children who require it to have the opportunity to learn Slovenian free of charge before entering primary school, including those already attending kindergartens.</li> <li>8. Recommendation to the MVI regarding free kindergarten attendance for Roma children from disadvantaged families and the provision of free transportation between Roma settlements and kindergartens.</li> <li>9. Recommendation to the MVI that socially vulnerable children, including Roma children, be provided with free participation in extracurricular activities of their choice and free transportation to and from these activities.</li> </ol>

	<p>10. Recommendation to the MVI to ensure the employment of Roma assistants in all kindergartens and schools attended by Roma children, with priority given to the south-eastern part of the country.</p> <p>11. Recommendation to the MVI to ensure that the existing optional subject, Roma culture, is taught in all primary schools in areas where Roma communities live.</p> <p>12. Recommendation to municipalities to provide adequate living conditions in Roma settlements to guarantee the right to adequate accommodation.</p>
Implementation	This activity was carried out by Department A in coordination with the Head and the Office.

**Indent eight of Article 21 of the ZVarD****Participating in judicial proceedings in relation to discrimination in accordance with the ZVarD**

Question	In how many and which judicial proceedings did the Advocate participate in 2025 in accordance with Article 41 of the ZVarD?
Answer	<b>In 2025, the Advocate participated in three cases, involving the representation in judicial proceedings of persons subjected to discrimination</b>
Explanation	<p>In 2025, the Advocate was involved in three ongoing cases representing discriminated persons in court.</p> <p><b>1. Action alleging discriminatory treatment in the employment process based on personal grounds related to parenthood and family status.</b></p> <p>In 2024, the Advocate assumed representation of a discriminated person in court proceedings before the local court. The judicial protection procedure against discrimination has not yet been concluded.</p> <p>In 2025, the Advocate took on two cases involving the representation of discriminated persons in court proceedings.</p> <p><b>2. Discriminatory treatment of a patient during medical treatment, after a gynaecologist, based on conscientious objection, refused to continue treatment because of the patient's personal ground of same-sex orientation.</b></p> <p>In April 2025, the Advocate decided to represent the patient in court proceedings, having assessed that the case met the criteria for strategic litigation, raised significant systemic issues in the field of protection against discrimination, and had the potential to produce broader preventive and deterrent effects. The judicial protection procedure concluded with a court settlement, under which the gynaecologist agreed to pay the patient appropriate compensation.</p> <p><b>3. Action regarding discrimination against people with disabilities in public bus transportation</b></p> <p>In December 2025, the Advocate assumed representation of a discriminated person in court proceedings before the local court. According to the Advocate's assessment, a court decision in such a case would make a significant contribution to reducing discrimination against people with disabilities. The judicial protection procedure against discrimination has not yet been concluded.</p>
Implementation	This activity was carried out by Department B in coordination with the Head and the Office.

**Indent nine of Article 21 of the ZVarD****Ensuring the exchange of available information on discrimination with the bodies of the European Union**

Question	What volume and type of information did the Advocate exchange at the international level in 2025?
Answer	<b>In 2025, the Advocate carried out 18 mutual exchanges of information on discrimination within the European Union and with international organisations.</b>
Explanation	<p>In 2025, the Advocate carried out 18 mutual information exchanges with European and international organisations, for the purpose of monitoring the situation with regard to discrimination. In the course of these exchanges, the Advocate responded to 17 requests for information and submitted 1 request for information.</p> <p>To support these information exchanges, the Advocate published an English language brochure entitled <i>The Evolution of the Advocate of the Principle of Equality, Slovenian Equality Body</i>. The brochure was distributed to all participants of the international conference entitled "The (R)evolution of Equality Law: Reflecting on 25 Years of Anti-Discrimination Law in Europe &amp; Beyond".</p>
Implementation	These activities were carried out by Departments A and B in coordination with the Head and the Office.

Question	In how many international events related to protection against discrimination did the Advocate participate in 2025?
Answer	<b>In 2025, the Advocate participated in 46 international expert consultations, conferences and other events.</b>
Explanation	<p>In 2025, the Advocate participated in 46 international expert consultations, conferences and other events, held either in person or online, including:</p> <ul style="list-style-type: none"> <li>– 25 meetings within working groups of the European Network of Equality Bodies (Equinet), as well as other meetings organised or co-organised by Equinet;</li> <li>– Six events organised within the EU and by organisations operating under its auspices;</li> <li>– Two events organised within the Council of Europe;</li> <li>– One event organised within the United Nations;</li> <li>– 12 other international professional events and meetings.</li> </ul>
Implementation	These activities were carried out by Departments A and B in coordination with the Head and the Office.

**Indent ten of Article 21 of the ZVarD****Performing other tasks stipulated by the ZVarD**

Question	What other tasks of the Advocate are laid down in the ZVarD?
Answer	<b>Other tasks of the Advocate laid down in the ZVarD include examining initiatives to assess the discriminativeness of, or to review the constitutionality of, a law or other regulation (Article 38 of the ZVarD).</b>

Question	How many initiatives to assess the discriminativeness of, or to review the constitutionality of, a law or other regulation did the Advocate handle in 2025?
Answer	<b>In 2025, the Advocate handled 28 initiatives to assess discriminativeness of regulations.</b>
Explanation	<p>In 2025, the Advocate conducted 28 assessments of discriminativeness of regulations, of which 15 were completed.</p> <p>In one case, the Advocate assessed that a regulation was discriminatory and issued an assessment of discriminativeness along with a recommendation.</p> <p>In another case, the Advocate discontinued the procedure for the assessment of discriminativeness, but still issued a recommendation.</p> <p>In 13 cases, no assessment of discriminativeness of regulations was initiated; however, in one of these cases a recommendation was issued.</p> <p>13 assessments of discriminativeness of regulations were carried over to 2026 for further consideration.</p>
Implementation	This activity was carried out by Department B in coordination with the Head and the Office.

### 3 THE ADVOCATE'S WORK ON INDIVIDUAL CASES

The basic legal act under which the Advocate exercises its powers is the Protection Against Discrimination Act (ZVarD), which defines the Advocate's personal and material competence.

Material competence refers to the question of who may seek protection against discrimination. This primarily includes natural persons or groups of natural persons. A legal entity may seek protection against discrimination only if it is subjected to discrimination due to the personal grounds of the natural persons associated with that legal entity (paragraph three of Article 1 of the ZVarD), for example as its members, founders, or members of its management and/or administration.

Substantive competence refers to areas in which discrimination is prohibited in Slovenia.

The Advocate conducts discrimination investigation procedures in accordance with the ZVarD, applying the General Administrative Procedure Act (ZUP) *mutatis mutandis*. Complaints and questions received by the Advocate cover numerous areas extensively regulated by law in Slovenia. Accordingly, in performing its activities, the Advocate also applies all other regulations in force in the Republic of Slovenia, including the Constitution, laws and implementing regulations.

Article 2 of the ZVarD provides for protection against discrimination based on various personal grounds in areas of social life, in the exercise of human rights and fundamental freedoms, in the exercise of rights and obligations, and in other legal relationships in the political, economic, social, cultural, civil or other fields.

Article 4 of the ZVarD defines discrimination as any unjustified actual or legal unequal treatment, differentiation, exclusion or restriction or failure to act on the basis of personal grounds which has the aim or effect of hindering, impairing or nullifying the recognition, enjoyment or exercise, on an equal footing, of human rights and fundamental freedoms, other rights, legal interests and benefits.

**For the purposes of identifying discrimination, the following must be established:**

1. The personal ground on the basis of which discrimination occurs;
2. The area in which discrimination occurred;
3. The form of discrimination,
4. Whether the difference in treatment interferes with a person's rights, freedoms, benefits or privileges;
5. The causal link between the personal ground and the unequal treatment that interferes with the person's rights, freedoms, benefits, or privileges;
6. Whether difference in treatment falls within any of the exceptions to the prohibition of discrimination that do not constitute a violation of the law.

From a legal standpoint, only conduct that includes all of the aforementioned elements constitutes discrimination under the ZVarD. Other undesirable, controversial, or wrongful conduct that is not linked to personal grounds or does not interfere with rights, freedoms, legal interests, or benefits does not constitute discrimination. However, such conduct may constitute other illegal acts, the handling of which falls under the competence of other authorities.

#### Personal grounds

Article 1 of the ZVarD defines the purpose and scope of the Act, which includes providing protection against discrimination on the basis of **certain personal grounds**. The ZVarD summarises, in particular, the personal grounds listed in the Constitution, the Criminal Code (KZ-1) and the Employment Relationships Act (ZDR-1).

Under the ZVarD, personal grounds are: gender, nationality, race or ethnic origin, language, religion or belief, disability, age, sexual orientation, gender identity and gender expression, social status, economic status, education or any other personal ground.

It follows from the explanatory notes to the proposal for the ZVarD<sup>6</sup> that personal grounds are innate or acquired personal characteristics, traits, conditions, or statuses that are, as a rule, permanently and inseparably linked to a specific individual and their personality, particularly their identity, and which the individual does not change easily.

Based on this, the Advocate also considers other personal grounds not explicitly listed in the ZVarD to include citizenship (citizenship of another EU Member State, citizenship of a third country), pregnancy, parenthood, health status, place of birth, skin colour, place of residence, etc.

Protection against discrimination is also guaranteed to persons who are in any way (legally or factually) connected to a person with a certain personal ground (e.g., through marriage, kinship, or association). The perpetrator, therefore, cannot evade liability by arguing that the person they discriminated against does not have a personal ground, but that a connected person does. This form of discrimination is known as “discrimination by association” (indent one of paragraph two of Article 5 of the ZVarD).

Protection against discrimination is also guaranteed to persons who are discriminated against because a certain personal ground is attributed to them. It is therefore irrelevant whether the person actually possesses a certain personal ground if they were discriminated against on the assumption that they had that personal ground. Accordingly, the perpetrator cannot evade liability by arguing that the person they discriminated against due to the attributed personal ground does not, in fact, have that personal ground (indent two of paragraph two of Article 5 of the ZVarD).

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<sup>6</sup> Explanatory notes to Article 1 to the ZVarD, presentation of the Act proposal (EVA 2015-2611-0046, page 39)

## Areas of social life

Article 2 of the ZVarD defines the areas of social life in which equal treatment and prohibition of discrimination are guaranteed in accordance with the EU law. The listed areas are based on EU directives and the case-law of the Court of Justice of the European Union. Under the ZVarD, equal treatment applies only to areas of social or public life (including civil and economic matters), that is, to areas in which individuals (or, in certain cases, legal entities) exercise their rights or fulfil their obligations and engage in legal transactions; it does not apply to strictly private relationships (such as family, friendship, or intimate relationships).

## Areas of social life covered by protection against discrimination

### 1. Work and employment

- 1.1 Conditions for access to employment, self-employment and profession (including selection criteria and recruitment conditions, irrespective of the type of activity and at all levels of the occupational hierarchy, including promotions).
- 1.2 Access to all forms and all levels of career orientation and counselling, vocational and professional education and training, further vocational training and retraining, including internship.
- 1.3 Employment and working conditions, including termination of employment contract and pay.

### 2. Membership in workers' and employers' organisations

- 2.1 Membership of, and involvement in, an organisation of workers or employers, or any organisation whose members carry on a particular profession, including the benefits provided for by such organisations,

### 3. Social rights

- 3.1 Social protection, including social security;
- 3.2 Social benefits.

### 4. Healthcare

- 4.1 Healthcare.

### 5. Education

- 5.1 Education and schooling.

### 6. Market of goods and services

- 6.1 Access to and supply of goods and services which are available to the public, including housing.

### 7. Other

- 7.1 This area includes cases that cannot be classified into the above categories and cases (in the context of recommendations) that address all areas simultaneously or the general area of protection against discrimination.

#### **Forms of discrimination**

The ZVarD defines the terms direct and indirect discrimination in accordance with EU directives and specifies conduct that, in addition to direct and indirect discrimination, also constitutes discrimination. Discrimination further includes harassment and sexual harassment, as well as instructions to discriminate. Retaliatory measures against a person who has been discriminated against or a person assisting such person (victimisation) are prohibited. Incitement to discrimination is also recognised as a special form of discrimination.

#### **Forms of discrimination are:**

1. **Direct discrimination** (paragraph one of Article 6 of the ZVarD),
2. **Indirect discrimination** (paragraph 2 of Article 6 of the ZVarD),
3. **Harassment** (paragraph one of Article 8 of the ZVarD),
4. **Sexual harassment** (paragraph two of Article 8 of the ZVarD),
5. **Instructions to discriminate** (Article 9 of the ZVarD),
6. **Incitement to discrimination** (paragraph one of Article 10 to the ZVarD),
7. **Public justification of the neglect or contempt of persons or a group of persons on the basis of personal grounds** (paragraph two of Article 10 to the ZVarD),
8. **Victimisation** (Article 11 of the ZVarD).

The ZVarD also defines severe forms of discrimination. In accordance with paragraph three of Article 39 of the ZVarD, the determination of severe forms of discrimination is also relevant for establishing the amount of compensation for non-pecuniary damage in court proceedings. Likewise, the legislature has established higher fines for minor offences involving severe forms of discrimination, which may be imposed by the competent inspectorates.

#### **Severe forms of discrimination are:**

1. Multiple discrimination (Article 12 of the ZVarD),
2. Mass discrimination (Article 12 of the ZVarD),
3. Continuous or repeated discrimination (Article 12 of the ZVarD),
4. Discrimination with serious consequences (Article 12 of the ZVarD),
5. Discrimination that affects children (Article 12 of the ZVarD),
6. Discrimination that affects other vulnerable persons (Article 12 of the ZVarD),
7. Issuing or disseminating racist, religious, ethnic and gender discriminatory appeals, inducing, instigating or inciting hatred or discrimination, and making general public appeals encouraging discrimination (paragraph one of Article 10 of the ZVarD).

### 3.1 Statistics of cases closed in 2025

A total of 88 cases from previous years were carried over to 2025 for further consideration. In 2025, the Advocate received a total of 428 new written cases for advisory, discrimination investigation, and the assessment of discriminativeness of regulations.

In 2025, a total of 516 cases were handled.<sup>7</sup> Of these, 414 were completed, and 102 cases were carried over to 2026.

Of the 414 cases completed in 2025, 78% (323 cases) involved advisory support; 18.4% (76 cases) involved discrimination investigation procedures and the remaining 3.6% (15 cases) involved procedures to assess the discriminativeness of a regulation.

#### Graphical presentation of the statistics of cases handled and closed in 2025

Number of cases under consideration as at 31 December 2024  <b>88</b>  Advisory: 10 Discrimination investigation: 68 Assessment of discriminativeness: 10	+	Number of cases received in 2025  <b>428</b>  Advisory: 371 Discrimination investigation: 39 Assessment of discriminativeness: 18	=	Number of cases closed in 2025  <b>414</b>  Advisory: 323 Discrimination investigation: 76 Assessment of discriminativeness: 15	+	Number of cases under consideration as at 31 December 2025  <b>102</b>  Advisory: 58 Discrimination investigation: 31 Assessment of discriminativeness: 13
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*The statistical overview includes written advisory but does not cover advisory provided by telephone via the toll-free number 080 81 80.*

Closed cases include those in which individuals were provided with advisory in accordance with indent four of Article 21 of the ZVarD, cases in which a discrimination investigation procedure under Chapter 5 of the ZVarD was carried out, and cases in which the Advocate conducted a procedure to assess discriminativeness of regulations in accordance with Article 38 of the ZVarD.

<sup>7</sup> This total also includes two cases that were originally handled as discrimination investigation procedures, but were reclassified in 2025: one as an assessment of discriminativeness of regulations and the other as an advisory case. Accordingly, the Advocate statistically records them as a new assessment of discriminativeness of regulations and as an advisory case, within the framework of assessments of discriminativeness of regulations and advisory procedures. The advisory procedure was also completed in 2025, while the assessment of discriminativeness of the regulation was carried over as unresolved to 2026.

### 3.2 Statistics of cases closed by personal grounds

**Table: Alleged personal grounds of discrimination in cases closed in 2025**

<b>Alleged personal grounds of discrimination</b>	<b>Discrimination investigation</b>	<b>Reviews</b>	<b>Total</b>	<b>Percentage of total (%)</b>
1. Gender	11	3	14	9.4
2. Nationality	5	0	5	3.4
3. Race or ethnic origin	4	0	4	2.7
4. Language	1	0	1	0.7
5. Religion or belief	12	1	13	8.7
6. Disability	6	4	10	6.7
7. Age	13	0	13	8.7
8. Sexual orientation	4	0	4	2.7
9. Gender identity	2	0	2	1.3
10. Gender expression	1	0	1	0.7
11. Social status	4	0	4	2.7
12. Property status	5	1	6	4
13. Education	3	0	3	2
14. Citizenship	4	0	4	2.7
15. Place of residence	1	0	1	0.7
16. Pregnancy, parenthood	8	1	9	6
17. Health status	18	2	20	13.4
18. Other	28	4	32	21.5
19. No personal ground	2	1	3	2
<b>TOTAL</b>	<b>132</b>	<b>17</b>	<b>149</b>	<b>100</b>

In individual initiatives, discrimination on the basis of multiple personal grounds could be alleged simultaneously; in others, no certain personal ground was cited as the reason for discrimination, or the issues raised were of a general nature and did not pertain to any particular personal ground or to discrimination. As a result, the number in the "Total" column and row does not match the number of cases closed in 2025.

The statistical overview of cases closed by personal grounds shows that in approximately two percent of closed cases involving discrimination investigation or assessments of discriminativeness of regulations, no personal ground was identified. This was either because it could not be inferred from the description of the conduct, or because the initiators alleged unequal treatment for reasons that do not qualify as a personal ground under the ZVarD.

### 3.3 Statistics of cases closed by areas of social life

Table: Alleged areas of life in cases closed in 2025

Areas of alleged discrimination	Discrimination investigation	Reviews	Total	Percentage of total (%)
1. Access to employment, self-employment and occupation, including selection criteria and recruitment conditions, whatever the branch of activity, and at all levels of professional hierarchy, including promotion	6	2	8	9
2. Access to all forms and all levels of career orientation and counselling, vocational and professional education and training, further vocational training and retraining, including internship	1	0	1	1.1
3. Employment and working conditions, including termination of employment contract and pay	28	2	30	33.7
4. Membership of, and involvement in, an organisation of workers or employers, or any organisation whose members carry on a particular profession, including the benefits provided for by such organisations	1	0	1	1.1
5. Social protection, including social security and social benefits	4	1	5	5.6
6. Healthcare	1	2	3	3.4
7. Education	3	4	7	7.9
8. Access to and supply of goods and services which are available to the public, including housing	18	1	19	21.4
9. Other	11	4	15	16.8
<b>TOTAL</b>	<b>73</b>	<b>16</b>	<b>89</b>	<b>100</b>

A single initiator may allege discrimination in multiple areas of life simultaneously, or in other areas not explicitly defined by the ZVarD, discrimination may also be alleged in areas beyond the Advocate's competence, or the Advocate may receive only requests for general information about the cases in question, etc. As a result, the number in the "Total" column and row does not match the number of cases closed in 2025. Approximately 16.8 percent of cases concerned areas not explicitly mentioned in the ZVarD, including, for example, the functioning of courts, the administrative operations of state authorities, internal affairs, the conditions of public tenders, and the media sector.

### 3.4 Statistics of cases closed by form of discrimination

**Table: Alleged forms of discrimination in cases closed in 2025**

<b>Alleged forms of discrimination</b>	<b>Discrimination investigation</b>	<b>Reviews</b>	<b>Total</b>	<b>Percentage of total (%)</b>
Direct discrimination	34	6	<b>40</b>	<b>60</b>
Indirect discrimination	12	10	<b>22</b>	<b>32.5</b>
Harassment	1	0	<b>1</b>	<b>1.5</b>
Sexual harassment	1	0	<b>1</b>	<b>1.5</b>
Instructions to discriminate	1	0	<b>1</b>	<b>1.5</b>
Victimisation	1	0	<b>1</b>	<b>1.5</b>
Incitement to discrimination or public justification of neglect and contempt	1	0	<b>1</b>	<b>1.5</b>
<b>Total:</b>	<b>51</b>	<b>16</b>	<b>67</b>	<b>100</b>
<b>Of which:</b>				
Mass	1	0	<b>1</b>	<b>100</b>
Multiple	0	0	<b>0</b>	<b>0</b>
Intersectional	0	0	<b>0</b>	<b>0</b>

A case may exhibit characteristics of several forms of discrimination simultaneously; in other cases, however, it is not possible to identify a specific form of discrimination, as the cases do not fall within the same area. As a result, the number in the "Total" column and row does not match the number of cases closed in 2025.

## 4 ADVISORY, INFORMATION AND SUPPORT ACTIVITIES

In 2025, the Advocate **completed 323 advisory cases based on written complaints and conducted 265 advisory consultations based on telephone complaints**. In these cases, the Advocate informed users about its competences and the options available to them in cases of discrimination, provided advisory support in procedures they were already pursuing as parties before other state authorities, and offered support in procedures related to protection against discrimination. In total, the Advocate handled **588 advisory cases**.

Cases handled as part of the Advocate's advisory, information and support activities are concluded in various ways. An official note is made of telephone advisory cases conducted in response to incoming calls or written complaints. The majority of written complaints are concluded with a written explanation. In some instances, the Advocate facilitates an amicable resolution of the situation by making inquiries with the alleged perpetrator. Advisory cases may also be concluded through the issuance of a recommendation, or by calling on the perpetrator to take action and remedy the disputed practices.

The conclusion of an advisory case also depends on the responsiveness of the complainant. If the complainant is anonymous or unresponsive during the procedure, and if the original complaint does not provide sufficient information to prepare an explanation, the case is concluded with an official note.

### Graphical presentation of advisory statistics based on written complaints in 2025

No. of advisory cases based on written complaints under consideration as at 31 December 2024  <b>10</b>	+	No. of advisory cases received following written complaints in 2025  <b>371</b>	=	No. of advisory cases completed following written complaints in 2025  <b>323</b>	+	Number of advisory cases based on written complaints under consideration as at 31 December 2025  <b>58</b>
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**Table: Outcomes of advisory services based on written complaints in cases closed by the Advocate in 2025**

<b>Outcome of advisory services</b>	<b>Number</b>	<b>Percentage (%)</b>
Written explanation	267	82.7
Written recommendation	9	2.8
Official note (on advisory support provided by telephone)	34	10.5
Official note (user unresponsive; further systemic work by the Advocate, case completed)	6	1.9
Referral of the case to a discrimination investigation procedure	4	1.2
Referred of the case to a procedure of assessment of discriminativeness of a regulation	1	0.3
Other (notification, acknowledgment, online survey)	2	0.6
<b>TOTAL</b>	<b>323</b>	<b>100</b>

## 5 ADVOCACY – REPRESENTATION IN JUDICIAL PROCEEDINGS

### Representation under the Protection against Discrimination Act

The Advocate's competence to represent and accompany discriminated persons in court proceedings initiated on the basis of Article 39 of the ZVarD is defined in Article 41 of the ZVarD. This provision sets out specific conditions that the Advocate must meet to **represent** discriminated persons in actions before courts. The Act provides that procedural acts on behalf of the Advocate may be carried out solely by a person who is employed by the Advocate and has passed the state bar examination (paragraph one of Article 41 of ZVarD). Before the court, the Advocate must present a power of attorney from the person subjected to discrimination.

If the person gives their consent, the Advocate may only **accompany** them in court proceedings. Such accompaniment does not require a power of attorney; it is sufficient for the discriminated person to state that they are accompanied by a specific person employed by the Advocate and that they wish that person to be present during the proceedings.

These proceedings concern civil law disputes in which a person who believes that they have been or are being discriminated against may bring an action seeking cessation of discrimination, the payment of compensation for discrimination or the publication of the judgment in the media.

The Advocate may also participate in court proceedings in which it acts as a party in administrative disputes constituting judicial oversight of binding decisions issued in specific administrative discrimination investigation procedures under the ZVarD.

### Representation under the Collective Actions Act

In accordance with Article 57 of the Collective Actions Act <sup>8</sup> (ZKoIT), in cases of alleged discrimination of a large number of persons who cannot be identified, the Advocate is exclusively entitled to bring an action requesting the cessation of conduct that constitutes discrimination under the law governing protection against discrimination or the prohibition of the commencement of such conduct.

Pursuant to Article 23 of the Rules of Procedure of the Advocate of the Principle of Equality, the Advocate decides whether to participate in court proceedings in a particular case, taking into account the nature of the individual case and the Advocate's own staffing and financial resources, which are assessed on a case-by-case basis. In cases of strategic litigation, the focus is not on the individual case; rather, such cases are used by the Advocate to pursue its strategic objectives in the field of protection against discrimination.

The Protection Against Discrimination Act and the Collective Actions Act also confer the power to represent and accompany discriminated persons in court proceedings on non-governmental organisations that have the status of acting in the public interest in the field of protection against discrimination and the protection of human rights (Article 41 of the ZVarD and Article 57 of the ZKoIT).

<sup>8</sup> Official Gazette of the Republic of Slovenia [Uradni list RS], Nos 55/17, 133/23

## **Proposal to expand the Advocate's competences as part of the implementation of the new EU Directives on standards for equality bodies**

Under the new Directives on standards for equality bodies (Directive 2024/1499 and Directive 2024/1500), equality bodies must be granted the opportunity to participate more extensively in court proceedings (Article 10 of both Directives). The deadline for bringing into force the laws and other regulations necessary to align national legislation with the provisions of both Directives is 19 June 2026.

### **1) Amicus curie**

With the implementation of the aforementioned Directives, the Advocate's existing competences must be expanded to include, at a minimum, the right to participate in court proceedings in a manner that allows the Advocate to submit comments to the court or assist the court with its expert opinions in cases involving issues of discrimination (**amicus curiae**).

### **2) Right to initiate court proceedings in its own name**

Although the Advocate already has the option to participate in court proceedings by initiating proceedings on behalf of one or more victims (Article 39 of the ZVarD), and the option to participate in court proceedings under Article 39 of the ZVarD in support of one or more victims (paragraph four of Article 41 of the ZVarD), it would also be reasonable to grant the Advocate the right to initiate proceedings in its own name. Only in this way can the Advocate pursue the public interest independently of the will of the individual parties.

Pursuant to Article 23 of the Rules of Procedure of the Advocate of the Principle of Equality, the Advocate decides whether to participate in court proceedings in a particular case, taking into account the nature of the individual case and the Advocate's own staffing and financial resources, which are assessed on a case-by-case basis. In court proceedings under Article 39 of the ZVarD (strategic litigation), the focus is not on the individual case; rather, such proceedings are used by the Advocate to pursue its strategic objectives in the field of protection against discrimination; nevertheless, the proceedings remain dependent on the will of the discriminated person. Any party may settle or withdraw the action during the course of the proceedings. Only if the Advocate were also granted the right to initiate proceedings in its own name and in the public interest would it be able to pursue the objectives of protection against discrimination in the clear interest of the public.

### **3) Participation in criminal law proceedings**

Under current legislation, the Advocate does not have the competence to participate in criminal law proceedings. Following the entry into force of the laws implementing both directives, it would be reasonable to consider whether the Advocate could also participate in criminal law proceedings where elements of discrimination are present.

## 5.1 Case of representing persons subjected to discrimination in actions against discrimination

In 2025, the Advocate had **three cases** involving the **representation** of persons subjected to discrimination pending before the court.

1. **Action alleging discriminatory treatment in the employment process based on personal grounds related to parenthood and family status.**
2. **A case concerning discriminatory treatment of a patient in the provision of medical care, where a gynaecologist refused to continue treatment after submitting a conscientious objection to the Medical Chamber of Slovenia because of the patient's personal ground of same-sex orientation.**
3. **An action concerning discrimination against persons with disabilities in public bus transportation**

Further information on the Advocate's representation before the courts:

1. **Action alleging discriminatory treatment in the employment process based on personal grounds related to parenthood and family status.**

In 2024, the Advocate assumed representation of a discriminated person in court proceedings under Article 39 of the ZVarD before the local court.

A candidate applying for a position at a state institution, was asked during the job interview whether she had a family and children. She subsequently decided to bring an action for discriminatory treatment. During the preliminary discrimination investigation procedure, the Advocate found that two employees of a state institution had asked the candidate questions about her family life, which is prohibited by law. Both employees essentially confirmed the allegations set out in the discrimination complaint, stating that the questions regarding the candidate's family status were not asked to verify whether she met the conditions for employment. This indicates that the questions were unjustified, as they were not directly related to the employment relationship. The Advocate therefore found discrimination on the basis of personal grounds of parenthood and family status.

The Advocate decided to represent the party after assessing that the case could be beneficial to many job seekers and employers. In its work, the Advocate observes that such cases are common in practice and that young women, in particular, are still asked questions about family planning during job interviews, despite this being expressly prohibited by law. By undertaking the legal representation of the discriminated party, the Advocate seeks to underline the unacceptability of such conduct.

**The judicial protection procedure for protection against discrimination has not yet been concluded (0703-2/2024).**

**In 2025, the Advocate assumed representation of two additional persons subjected to discrimination in court proceedings under Article 39 of the ZVarD before the local court. One case was concluded by way of a court settlement, while the other case remains pending.**

- 2. A case concerning discriminatory treatment of a patient in the provision of medical care, where a gynaecologist refused to continue treatment after submitting a conscientious objection to the Medical Chamber of Slovenia because of the patient's personal ground of same-sex orientation.**

In a discrimination investigation procedure, concluded in June 2023, the Advocate found that discrimination had occurred in a case where a gynaecologist, invoking conscientious objection, refused to continue providing medical care to a patient on the grounds of her same-sex orientation and denied the provision of services related to procedures of medically assisted reproduction (MAR) exclusively to patients of same-sex orientation.

In April 2025, the Advocate decided to represent the patient in court proceedings, having assessed that the case met the criteria for strategic litigation, raised significant systemic issues in the field of protection against discrimination, and had the potential to produce broader preventive and deterrent effects. In the Advocate's assessment, a court decision in such a case would significantly contribute to reducing discrimination and eliminating unacceptable practices in future cases, particularly in the area of protecting the rights of members of the LGBT community. The decision to assume representation was taken with due regard to the Advocate's strategic priorities, the nature and gravity of the case, and its staffing and financial capabilities.

**The court proceedings for protection against discrimination were concluded by way of a court settlement, under which the gynaecologist agreed to pay the patient appropriate compensation (0703-4/2024).**

### **3. An action concerning discrimination against persons with disabilities in public bus transportation**

In December 2025, the Advocate assumed, in accordance with Article 41 of the ZVarD, the representation of a person alleging discrimination in court proceedings before the local court.

For many years, the Advocate has been drawing attention to the inaccessibility of public inter-urban passenger transport for persons with disabilities, particularly those with mobility impairments. In June 2023, the Advocate issued a special report on this issue and reminded the competent authorities that the deadline for adapting buses, as established in the Equalisation of Opportunities for Persons with Disabilities Act, had already expired in December 2020.

The Advocate represents a person with a disability who uses an electric wheelchair. She wished to take a bus from her place of residence to her physical therapy appointment. However, when she attempted to board the bus, it became apparent that the vehicle was not adapted for the transport of persons with mobility impairments. The bus company also failed to provide her with alternative transportation, as required by the Equalisation of Opportunities for Persons with Disabilities Act. The person therefore decided to file an action for discrimination, in which the Advocate would represent her in accordance with Article 41 of the ZVarD.

Slovenia ratified the Convention on the Rights of Persons with Disabilities as early as 2008. The Convention stipulates that persons with disabilities must be enabled to live independently and participate fully in all aspects of life. Equal treatment, including in access to goods and services, is guaranteed to persons with disabilities under the Constitution, the Equalisation of Opportunities for Persons with Disabilities Act, and the Protection Against Discrimination Act. Less favourable treatment arises from a failure to comply with these legal provisions. Through its special reports, recommendations and representation in civil litigation, the Advocate seeks to reduce this shortfall, at least in areas as fundamental as mobility.

The Advocate decided to represent the patient in court proceedings, having assessed that the case met the criteria for strategic litigation, raised significant systemic issues in the field of protection against discrimination, and had the potential to produce broader preventive and deterrent effects. In the Advocate's view, a court decision in such a case would significantly contribute to reducing discrimination. The decision to assume representation was taken with due regard to the Advocate's strategic priorities, the nature and gravity of the case, and the Advocate's staffing and financial capabilities.

**The court proceedings for protection against discrimination have not yet been concluded (0703-6/2025).**



## 6 DISCRIMINATION INVESTIGATION

### 6.1 Discrimination investigation procedure

Discrimination investigation is carried out in accordance with a special administrative procedure, either on the basis of discrimination complaints received by the Advocate from parties (pursuant to Article 33 of the ZVarD) and in procedures initiated ex officio (Article 34 of the ZVarD).

Upon receipt of a complaint, the Advocate first examines whether the complaint contains all the essential elements, as set out in Article 36 of the ZVarD, and assesses whether the burden of allegation and proof has been met. This means verifying whether facts are presented that justify the presumption that the prohibition of discrimination has been violated, namely:

- whether the personal ground allegedly giving rise to less favourable treatment is identified;
- whether less favourable treatment occurs in an area covered by the prohibition of discrimination;
- whether the conduct in question constitutes one of the forms of discrimination prohibited by law;
- whether the treatment that is the subject of the complaint is of such nature as to interfere with rights, freedoms, benefits, or legal interests;
- whether a causal link exists between the personal ground and less favourable treatment;
- whether a disadvantage arises in comparison with other individuals or groups in a comparable situation;
- whether the conduct falls within the exceptions to the prohibition of discrimination under Article 13 of the ZVarD.

If the burden of allegation and proof has not been met or if essential elements of the complaint are missing, the party is requested to supplement the complaint, having due regard to, as appropriate, the rules of general administrative procedure.

In the case of an anonymous discrimination complaint, the Advocate verifies whether the conditions for initiating an ex officio procedure are met, in accordance with Article 34 of the ZVarD.

Upon receipt of a complete complaint in which the burden of allegation and proof has been met, and pursuant to Article 37 of the ZVarD, the Advocate verifies the allegations with the alleged perpetrator or other entities from whom the Advocate may request the provision of those data and documents that, in accordance with the principle of proportionality, are indispensable for considering the case in order to establish the existence of discrimination. At the Advocate's request, state authorities, local communities, holders of public authority, and legal and natural persons provide the Advocate, free of charge, with all information, including personal data, and documents urgently required by the Advocate to establish whether discrimination occurred in the case under consideration.

The nature of the discrimination investigation procedure, in which the key rule is the reversal of the burden of proof (paragraph one of Article 40 of the ZVarD), encourages alleged perpetrators of discrimination to participate in the procedure, since, where the complainant meets the burden of allegation, the burden of proof shifts to those alleged perpetrators, who must demonstrate that no discrimination occurred. Failure to take this opportunity to prove non-discrimination may have adverse procedural consequences.

## 6 DISCRIMINATION INVESTIGATION

The Advocate is not authorised to impose sanctions where alleged perpetrators or other entities fail to respond to requests for information.

In discrimination investigation procedures conducted pursuant to Articles 33 or 34 of the ZVarD, the Advocate may issue decisions finding that discrimination has occurred, establishing that discrimination has not occurred, or rejecting the complaint. If the complainant fails to respond to a request to supplement the complaint or does so inadequately despite such request, the Advocate terminates the procedure by issuing a decision dismissing the complaint. In cases where the parties reach a mutual settlement with the Advocate's assistance, resulting in the withdrawal of the complaint, the procedure is discontinued by a decision. The Advocate acts in the same manner if the complainant withdraws the complaint during the procedure for any other reason.

The Advocate may also handle a complaint, on the basis of which a discrimination investigation procedure could otherwise be initiated, through alternative means if it assesses that discrimination can thereby be remedied more quickly and effectively. In cases of manifest violations, particularly where the Advocate may have previously decided on similar cases (such as overtly discriminatory apartment rental advertisements or job advertisements), it may call on the alleged perpetrator to remedy the violation and inform the complainant thereof. If the perpetrator remedies the discrimination, the Advocate closes the case. If the perpetrator fails to remedy the discrimination following the Advocate's request, a substantive decision or a procedural decision may be issued. Alternatively, depending on the nature of the case, the Advocate may decide to refer the matter directly to the competent inspectorate for review, which may also impose fines. Where the Advocate assesses that a complaint is in substance a request for advisory assistance, it may also provide written guidance to the person alleging discrimination. In such cases, the procedure is concluded with an explanation from the Advocate.

**The Advocate may initiate a discrimination investigation procedure ex officio** in accordance with Article 34 of the ZVarD. The establishment of facts and the collection of evidence regarding the existence of discrimination are carried out in the same manner, that is, in accordance with Article 37 of the ZVarD and by applying, *mutatis mutandis*, the General Administrative Procedure Act (ZUP). The Advocate may initiate ex officio procedures on the basis of an anonymous complaint, an enquiry, or a complaint by a third party (who is not a person subjected to discrimination).

## 6.2 Statistics of discrimination investigation procedures

In 2025, the Advocate completed the examination of 76 complaints concerning discrimination investigation, 24 of which were initiated ex officio.

The Advocate issued 31 decisions and found discrimination in 13 cases.

In four cases<sup>9</sup>, the Advocate recommended that the competent authorities carry out an inspection or initiate minor offence proceedings.

### Graphical presentation of discrimination investigation statistics in 2025

Number of discrimination investigation cases under consideration as at 31 December 2024	+	Number of complaints received in 2025	=	Number of discrimination investigation cases completed in 2025	+	Number of discrimination investigation cases under consideration as at 31 November 2025
<b>68</b>		<b>39</b>		<b>76*</b>		<b>31</b>

\* This figure also includes two cases that were originally handled as discrimination investigation procedures but were reclassified in 2025: one as an assessment of discriminativeness of regulations and the other as an advisory case. Accordingly, the Advocate statistically records them as a new assessment of discriminativeness of regulations and as an advisory case, within the categories of assessments of discriminativeness of regulations and advisory procedures. The advisory procedure was completed in 2025, while the assessment of discriminativeness of the regulation was carried over as unresolved to 2026.

**Table: Outcomes of discrimination investigation procedures before the Advocate for cases completed in 2025**

Outcomes of procedures before the Advocate	Number	Percentage (%)
Decision – declaratory – discrimination found	13	17.1
Decision – declaratory – discrimination not found	6	7.9
Decision – negative – not a matter of discrimination	12	15.8
Decision to discontinue the procedure	29	38.2
Decision of dismissal on procedural grounds	5	6.6
Non-initiation of procedure	9	11.8
Reclassification as an assessment of discriminativeness of regulations, or as an advisory case	2	2.6
<b>TOTAL</b>	<b>76</b>	<b>100</b>

<sup>9</sup>Three of the cases resulted from discrimination investigation procedures, while one case arose from an advisory procedure.

### 6.3 Referral of cases to inspection authorities

Pursuant to paragraph four of Article 42 and Article 43 of the ZVarD the Advocate may refer a case to the competent inspectorate for consideration and propose that they carry out an inspection and/or initiate minor offence proceedings.

As the Advocate does not have the power to impose penalties for minor offences, it cannot itself sanction perpetrators upon identifying violations of the law.

The competent inspectorate is required to consider the referred case, however, it independently decides whether to conduct an inspection procedure, initiate minor offence proceedings, or undertake both.

It must notify the Advocate of its decision. If the inspectorate fails to notify the Advocate of the status of the case, the Advocate makes enquiries with the competent inspectorate until the case is concluded and the Advocate is informed of the inspectorate's decision.

#### Open cases from previous years

The Advocate has not yet been informed of the conclusion of proceedings before the competent inspection or minor offence authorities in **12 cases**. Of these 12 cases, the competent inspectorates concluded **eight cases** in 2025.

#### Proposals by the Advocate for inspection and minor offence supervision in 2025

In 2025, the Advocate submitted **four new proposals** for the initiation of inspection or minor offence proceedings:

- In three cases concerning discriminatory payment of performance-related remuneration, the Advocate proposed minor offence proceedings (Labour Inspectorate of the Republic of Slovenia).
- In one case concerning a discriminatory job advertisement, the Advocate proposed inspection or minor offence proceedings (Labour Inspectorate of the Republic of Slovenia).

All four proposals were forwarded to the Labour Inspectorate.

The Advocate has not yet been informed whether inspection or minor offence proceedings will be initiated in the cases referred to by the Advocate in 2025. None of these four cases has yet been concluded.

According to the Advocate's records, **as at 31 December 2025, there were still eight open cases in which the Advocate had proposed that the competent authorities initiate inspection or minor offence proceedings**, but had not yet been informed of the outcome of those cases.

#### 6.4 Proceedings before the Administrative Court of the Republic of Slovenia concerning the Advocate's decisions

An administrative dispute may be brought against a decision of the Advocate in accordance with the Administrative Dispute Act (ZUS-1).

In 2025, the Administrative Court issued decisions in **seven** cases concerning the decisions of the Advocate, as follows:

- 1.- 4. In cases concerning discrimination investigation on the grounds of health status and parenthood in the calculation of job performance, where the presence at the workplace in companies was taken into account (Decision No **0700-14/2021/10** of 7 September 2021, Case No **0703-3/2021**, Decision No **0700-55/2020/17** of 11 October 2021, Case No **0703-4/2021**, Decision No **0700-3/2021/6** of 13 December 2021, Case No **0703-1/2022** and Decision No **0700-57/2022/6** of 28 February 2023, Case No **0703-3/2023**), **the court dismissed the actions and upheld the decisions of the Advocate;**
5. In a case concerning racial discrimination against a customer in connection with the conduct of security guards in a store (Decision No **0700-30/2018/58** of 16 July 2019, Case No **0703-2/2019**), the court **annulled the proceedings and remitted the case to the Advocate for reconsideration** (0700-31/2025);
6. In a case concerning discrimination against a public employee in a kindergarten on the grounds of parenthood in the annual job performance assessment (Decision No **0700-26/2020/41** of 1 July 2021, Case No **0703-2/2021**), **the court discontinued the proceedings following the withdrawal of the action.**
7. In a case concerning discrimination against an employee on the grounds of health status and parenthood in the calculation of the variable part of the performance allowance (Decision No **0700-31/2023** of 24 April 2025, Case No **0703-5/2025**), **the court discontinued the proceedings following the withdrawal of the action.**

As at 31 December 2025, **nine proceedings from previous years** were still pending before the Administrative Court, in which the parties to the administrative proceedings challenged decisions issued by the Advocate. These cases concerned, in particular, the following matters:

1. The discriminatory removal of an advertisement of the Zavod Živim institute from a city bus operated by the bus company Ljubljanski Potniški Promet (LPP); the case is currently being re-examined by the Administrative Court (Decision No **0700-2/2019/98** of 16 June 2022, Case No **0703-4/2022**).
2. The discriminatory closure of a personal bank account at the NKBM Bank on the grounds of Cuban citizenship (Decision No **0700-2/2021/37** of 9 March 2022, Case No **0703-2/2022**).
3. The discriminatory restriction of access to free ski passes for upper secondary students from the Municipality of Kranjska Gora based on the date of registration of permanent residence (Decision No **0700-53/2020/15** of 19 April 2022, Case No **0703-3/2022**).
4. Less favourable treatment by the radio station Radio Ognjišče of political parties whose programmes oppose the values of a particular religious community (Decision No **0700-9/2022/9** of 19 September 2022, Case No **0703-5/2022**).

## 6 DISCRIMINATION INVESTIGATION

5. Discrimination on the grounds of health status, parenthood, pregnancy, disability and family status in the determination of the criteria for awarding a job performance bonus at Petrol d.d., as well as a performance-related bonus for the sales team at Petrol, d. d., and Posredništvo pri prodaji, Bojan Podjaveršek, s. p. (Decision No [0700-13/2022/11](#) of 30 November 2022, Case No [0703-1/2023](#)).
6. Discrimination on the basis of the personal ground of place of residence in the selection of a personal physician at Domžale Health Centre (Decision No [0700-45/2022/10](#) of 23 January 2023, Case No [0703-2/2023](#)).
7. Discrimination against an upper secondary student with reading difficulties in taking the matura examination by the National Committee for the General Matura of the National Examination Centre (RIC) (Decision No [0700-34/2023/17](#) of 20 June 2023, Case No [0703-4/2023](#)).
8. A discriminatory question concerning family life in the context of recruitment procedures at the Eco Fund (Decision No [0700-3/2023/10](#) of 21 July 2023, Case No [0703-5/2023](#)).
9. Discriminatory refusal to open a current account for a citizen of Iran (Decision No [0700-56/2022/29](#) of 30 May 2024, Case No [0703-5/2024](#)).

In 2025, **an additional four actions** were brought against the Advocate's decisions concerning:

10. Discrimination found in the manner of rejection of a job applicant due to lack of knowledge of the Slovenian language (Decision No [0700-18/2023](#) of 11 December 2024, Case No [0703-1/2025](#));
11. Less favourable treatment found of a female employee in promotion due to illness (Decision No [0700-27/2023](#) of 20 March 2025, Case No [0703-3/2025](#));
12. Discrimination found on the grounds of health status and parenthood in the calculation of business performance pay, taking into account presence at the workplace (Decision No [0700-39/2022](#) of 2 April 2025, Case No [0703-4/2025](#));
13. Discrimination found on the grounds of health status and parenthood in the calculation of the Christmas bonus, taking into account presence at the workplace (Decision No [0700-2/2025](#) of 18 November 2025, Case No [0703-8/2025](#)).

**As at 31 December 2025, a total of 13 actions against the Advocate's decisions remained pending before the Administrative Court.**

By the completion of the editorial process of the regular annual report on 25 February 2026, the Advocate had been informed that a further two actions had been brought against its decisions issued in 2025 concerning:

1. Discrimination found against employees on the ground of health status or parenthood in the payment of performance bonuses (Decision No [0700-10/2025/11](#) of 18 November 2025);
2. Discrimination found against a job applicant on the grounds of his sexual orientation and same-sex marriage (Decision No [0700-64/2023/32](#) of 22 November 2025).

## 7 ASSESSMENT OF DISCRIMINATIVENESS OF REGULATIONS AND REQUEST FOR REVIEW OF CONSTITUTIONALITY

Article 38 of the ZVarD grants the Advocate the authority to lodge requests for the review of the constitutionality and legality of regulations before the Constitutional Court. The Advocate exercises this authority by first assessing whether a regulation is discriminatory, before deciding whether to initiate proceedings for the review of its constitutionality or legality.

The procedure for the assessment of discriminativeness is not an administrative procedure; it is an internal procedure designed to ensure transparency in decision-making. Based on the assessment of discriminativeness of a regulation, the Advocate either issues a recommendation for the amendment of the contested regulation or lodges with the Constitutional Court a request for the review of its constitutionality and legality.

Before assessing discriminativeness of a regulation, the Advocate conducts a preliminary assessment or analysis of that regulation.

A provision in a regulation is considered discriminatory if, in comparable situations, it results in unequal treatment of particular groups of people on the basis of one or more personal grounds referred to in paragraph one of Article 1 of the ZVarD (gender, nationality, race or ethnic origin, language, religion or belief, disability, age, sexual orientation, gender identity and gender expression, social status, financial status, education, or any other personal ground).

Treating individuals less favourably on the basis of personal grounds may be permissible, but only in exceptional cases, where a regulation has a legitimate aim (e.g., employment policy or social policy), and the means of achieving that aim are appropriate (suitable in relation to the aim), necessary (limited to what is strictly necessary), and proportionate (following a balancing of the various rights and interests involved).

The Advocate conducts the assessment of discriminativeness on the initiative of a party or on its own initiative.

If the Advocate determines that a regulation is discriminatory, it issues a recommendation for its amendment. Where deemed necessary, the Advocate may also lodge a request with the Constitutional Court for the review of the constitutionality of a law.

The Constitutional Court is the state authority taking a final decision on whether a particular regulation is unconstitutional.

## 7 ASSESSMENT OF DISCRIMINATIVENESS OF REGULATIONS AND REQUEST FOR REVIEW OF CONSTITUTIONALITY

### 7.1 Statistics of assessments of discriminativeness of regulations

In 2025, the Advocate conducted 28 assessments of discriminativeness of regulations; 15 of these assessments were completed, while the remaining 13 were carried over to 2026 for further consideration.

In one case closed, the Advocate assessed that a regulation was discriminatory and issued an assessment of discriminativeness together with a recommendation.

In 13 cases, no assessment of discriminativeness was initiated, while in one case, the Advocate discontinued the assessment procedure and issued a recommendation. Additionally, a recommendation was also issued in one of the cases, in which no assessment of discriminativeness of a regulation had been initiated.

As at 31 December 2025, 13 assessments of discriminativeness were under consideration.

#### Graphical presentation of statistics on assessments of discriminativeness of regulations in 2025

Number of assessments of discriminativeness of regulations under consideration as at 31 December 2024  <b>10</b>	+	Number of initiatives received for assessments of discriminativeness of regulations in 2025  <b>18</b>	=	Number of assessments of discriminativeness of regulations completed in 2025  <b>15</b>	+	Number of assessments of discriminativeness of regulations still under consideration as at 31 December 2025  <b>13</b>
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**Table: Outcomes of assessments of discriminativeness of regulations completed in 2025**

Outcomes of procedures before the Advocate	Number	Percentage (%)
Assessment – discriminativeness of regulation found	1	6.7
Proposal for non-initiation of an assessment procedure	13	86.7
Discontinuance of the assessment procedure	1	6.7
<b>Total number of assessments completed</b>	<b>15</b>	<b>100</b>
Still under consideration	13	
<b>Total number of assessments considered</b>	<b>28</b>	

In 2025, the Advocate found that one regulation was discriminatory. When evaluating the appropriateness of conducting assessments of discriminativeness of regulations, the Advocate discontinued the assessment procedure in one case and decided not to carry out an assessment in 13 cases.

## 7.2 Requests lodged with the Constitutional Court for review of constitutionality

Pursuant to Article 38 of the ZVarD the Advocate is authorised to lodge requests with the Constitutional Court for the review of the constitutionality and legality of regulations. Where, in the course of assessing discriminativeness of a regulation, the Advocate finds that a law or other regulation is discriminatory, it may either inform the person who initiated the request for the review of constitutionality and legality or itself initiate proceedings by lodging a request for the review of the constitutionality or legality of a regulation or other general legal act issued in the exercise of public authority.

The Advocate may lodge a request for the review of the constitutionality and legality of a regulation on the grounds of non-compliance with paragraph one of Article 14 of the Constitution, which prohibits discrimination in relation to any human right or fundamental freedom. It may also lodge such request on the grounds of non-compliance with paragraph two of Article 14 of the Constitution, which enshrines the general principle of equality before the law, but the latter only where the difference in treatment is based on personal grounds.<sup>10</sup>

In 2025, the Advocate did not lodge any requests with the Constitutional Court for the review of the constitutionality of a regulation; however, in previous years, the Advocate lodged five such requests – one in 2020, three in 2021, and one in 2023. In one of these cases, the constitutional review proceedings before the Constitutional Court are still pending, while in four cases the proceedings have already been concluded: in two cases in 2023 by an order dismissing the request for the constitutional review, and in two cases in 2021 and 2024, respectively, by a decision.

### **Request for constitutional review lodged by the Advocate with the Constitutional Court in 2023 and still pending before the Constitutional Court:**

1. In the Advocate's assessment, the Personal Assistance Act (ZOA) is unconstitutional insofar as it limits access to personal assistance to persons under the age of 65. In doing so, it fails to ensure equal enjoyment of constitutionally guaranteed rights for all persons, as it regulates the rights of persons with disabilities differently solely on the basis of age.

The proceedings before the Constitutional Court are still pending. The competent authority in the proceedings is the Government (discriminativeness assessment reference number: 050-16/2020/17, 050-3/2023,<sup>11</sup> request for constitutional review reference number: 0703-6/2023/1).

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<sup>10</sup> The Constitutional Court clarified the Advocate's standing to bring proceedings (locus standi) in its Decision U-I-16/21-12 and U-I-27/21-12.

<sup>11</sup> The Advocate issued an assessment of discriminativeness of the ZOA in 2021 in Case 050-16/2020 in this respect. Consequently, in Case 050-3/2023 in 2023, the Advocate did not carry out a new assessment, as the relevant provision had not changed, and considered the regulation to be discriminatory on the basis of the previously conducted assessment.

7 ASSESSMENT OF DISCRIMINATIVENESS OF REGULATIONS AND REQUEST FOR REVIEW OF CONSTITUTIONALITY

## 8 PROTECTION AGAINST DISCRIMINATION AT THE SYSTEMIC LEVEL

The Advocate also performs tasks and exercises its powers in the field of protection against discrimination under the ZVarD at the systemic level, that is, at the level of the position of social groups and social relations in the context of the institutional framework and the regulation of social sub-systems.

The provisions of the ZVarD on the basis of which the Advocate provides protection against discrimination at the systemic level are set out below.

In accordance with **Article 21 of the ZVarD**, the powers and tasks of the Advocate in the field of protection against discrimination include:

1. Conducting independent surveys on the situation of persons with a certain personal ground, particularly gender, nationality, race or ethnic origin, religion or belief, disability, age and sexual orientation and other issues relating to discrimination of people with a certain personal ground;
2. Publishing independent reports and making recommendations to state authorities, local communities, holders of public authority, employers, economic operators and other entities regarding the established situation of persons with a certain personal ground, namely relating to the prevention and elimination of discrimination and the adoption of specific and other measures to eliminate discrimination;
3. Raising the awareness of the general public on discrimination and measures to prevent it;
4. Monitoring the general situation in Slovenia in the field of protection against discrimination and the situation of persons with certain personal grounds;
5. Proposing the adoption of specific measures to improve the situation of persons who are disadvantaged on grounds of a certain personal ground;
6. Ensuring the exchange of available information on discrimination with the authorities of the European Union;
7. Performing other tasks stipulated by this Act.

Under **Article 15 of the ZVarD**, the Government and other state authorities are obliged to cooperate with social partners and non-governmental organisations: “When devising solutions and proposals to attain the purpose of this Act, the Government of the Republic of Slovenia and other state authorities are obliged to cooperate with social partners and non-governmental organisations operating in the field of equal treatment, the protection of human rights and fundamental freedoms, the protection of vulnerable groups against discrimination, or legal or social assistance to persons discriminated against”. Therefore, the Advocate as a state authority, places particular emphasis on dialogue with civil society organisations.

In accordance with indent one of **Article 22 of the ZVarD**, the Advocate “shall report on its work and findings on the existence of discrimination against individual groups of persons with a certain personal ground in regular annual or special reports to the National Assembly of the Republic of Slovenia”.

## 8.1 Overview of the Advocate's recommendations

In 2025, the Advocate issued **119 recommendations** in various procedures addressing cases of discrimination:<sup>12</sup>

### By type of recommendation

1	Recommendations on proposed laws (prevention of discrimination)	86
2	Recommendations on laws and other regulations in force (elimination of discrimination)	4
3	Recommendations to promote equal treatment (prevention of discrimination)	29
4	Recommendation to eliminate unequal treatment in specific cases	0

### By personal ground<sup>13</sup>

Gender	2
Race, nationality or ethnic origin	26
Language	2
Disability	36
Age	13
Sexual orientation	1
Gender identity	/
Gender expression	/
Social status	/
Property status	5
Education	1
Place of residence	1
Citizenship	1
Parenthood (or pregnancy)	2
Health status	2
Marital status	2
Religion	7
All personal grounds simultaneously / general area of protection against discrimination	16

<sup>12</sup> Since 2022, the Advocate has considered each individual item or specific recommendation contained in a submitted document to constitute a recommendation. This should be taken into account when making any comparison of data on recommendations issued in different annual reports.

<sup>13</sup> Personal grounds are listed in the order set out in Article 1 of the ZVarD. The total by personal grounds does not correspond to the overall number of recommendations, as some recommendations related to several personal grounds simultaneously. Some recommendations also related to the general area of protection against discrimination, rather than only to certain personal grounds.

**By areas of social life<sup>14</sup>**

Work and employment	2
Membership in workers' or employers' organisations	/
Social rights	7
Healthcare	/
Education	31
Market of goods and services	59
Other	20

**By type of addressee<sup>15</sup>**

The National Assembly	32
The Government	2
Ministries	73
Public law entities	13
Private law entities	1

The Advocate verified the status of recommendations by sending enquiries to the addressees in December 2025. On the basis of the responses received, the Advocate determined, as at the cut-off date of 31 December 2025, whether the recommendation had been implemented or not.<sup>16</sup> The status of recommendations was determined at the Advocate's discretion.

Some recommendations aimed at promoting equal treatment are systemic and general in nature; their primary purpose is preventive action and awareness-raising, and they are often addressed to multiple addressees simultaneously. In such cases, it is not possible to determine their status in a simple and unambiguous manner.

As at 31 December 2025, of the 119 recommendations:

- 17 recommendations were implemented (14.3%)
- 92 recommendations were not implemented (77.3%)
- 10 recommendations were systemic (8.4%).

<sup>14</sup> The total by areas of social life does not correspond to the overall number of recommendations, as some recommendations related to several areas simultaneously.

<sup>15</sup> The total by addressees does not correspond to the overall number of recommendations, as some recommendations related to several addressees simultaneously.

<sup>16</sup> By the completion of the editorial process of the annual report, the Advocate had not received responses from the Government, the Ministry of Culture, and the Ministry of Higher Education, Science and Innovation. In these cases the Advocate determined the statuses on the basis of the available information.

## 8.2 Measures for the elimination of discrimination and promotion of equal treatment

According to the established case law of the Constitutional Court, the “principle of equality before the law does not mean that the legislature may not regulate the statuses of individual legal entities differently”. The Constitutional Court stated that the legislator “is not required to treat all persons in all respects in the same manner, however, the aforementioned principle obliges the legislator to treat substantially equal cases equally and substantially unequal cases differently, taking into account their diversity and specific characteristics.”<sup>17</sup> Therefore, “the prohibition of discrimination also entails the recognition and exercise of specific legal positions or specific rights, as well as the implementation of positive measures, aimed at preventing the less favourable status of certain individuals.”<sup>18</sup>

In addition to the term “specific measures”, other expressions used to denote such measures include “temporary measures”, “reverse discrimination” and “positive discrimination”.

**Article 17 of the ZVarD** (Specific measures to ensure equality) provides:

“(1) Specific measures are temporary measures which have as their objective to guarantee the enjoyment of the right to equal treatment, equal opportunities or actual equality and participation in the areas of social life of persons who are disadvantaged or potentially disadvantaged on the basis of a particular personal ground. Specific measures shall be adopted with a view to prevent or eliminate the consequences of such a situation or compensate for a disadvantage.

(2) Specific measures shall include in particular:

- Incentive measures providing specific benefits or introducing special incentives for persons who are at a disadvantage in a particular area or particular environment,
- Positive measures favouring persons with a particular personal ground when the prescribed criteria and conditions are being equally met and which may, in particular, be applied when there is a clear disproportion as regards the possibilities of exercising the rights or accessing goods, services or benefits.”

According to the ZVarD, specific measures to ensure equality are measures that provide certain groups, which are in a less favourable position due to their personal grounds, with equal opportunities to participate on an equal footing in different areas of social life (e.g. employment, work and education). The primary objective of introducing specific measures is to ensure equal treatment and to eliminate inequality or a less favourable position of persons with a certain personal ground, i.e. through preferential treatment in accessing rights, goods and services. In accordance with **Article 14 of the ZVarD**, state authorities, local communities, self-governing national communities and holders of public authority are obliged to provide the conditions for equal treatment of all persons, irrespective of any personal ground (e.g., older people, persons with disabilities, women and men, parents, foreigners and so forth). Under Article 17 of the ZVarD, they may also adopt specific measures of a regulatory and political nature to achieve this aim.

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<sup>17</sup> Ljubljana Higher Court. Available at:

[http://www.sodnapraksa.si/?q=id:2012032113059000&database\[SOVS\]=SOVS&database\[IESP\]=IESP&database\[VDSS\]=VDSS&database\[UPRS\]=UPRS&\\_submit=i%C5%A1%C4%8Di&page=0&id=2012032113059000](http://www.sodnapraksa.si/?q=id:2012032113059000&database[SOVS]=SOVS&database[IESP]=IESP&database[VDSS]=VDSS&database[UPRS]=UPRS&_submit=i%C5%A1%C4%8Di&page=0&id=2012032113059000).

<sup>18</sup> Higher Labour and Social Court. Available at:

[http://www.sodnapraksa.si/?q=diskriminacija&database\[VDSS\]=VDSS&\\_submit=i%C5%A1%C4%8Di&rowsPerPage=20&page=2&id=2010040815248168](http://www.sodnapraksa.si/?q=diskriminacija&database[VDSS]=VDSS&_submit=i%C5%A1%C4%8Di&rowsPerPage=20&page=2&id=2010040815248168).

As part of its monitoring of the situation in the field of protection against discrimination in the country, the Advocate conducted an enquiry in January 2026 among ministries, their constituent bodies, and certain government offices regarding the general and specific measures for protection against discrimination, and the promotion of equality, equal treatment and equal opportunities that they had implemented in 2025. The Advocate has been conducting inquiries on all measures annually since 2017.

The Advocate divided the enquiry on substantively relevant measures into two parts as follows:

1. Information on policy and regulatory measures aimed at **persons or groups of persons with certain personal grounds** and the wider public (general measures), and
2. **Specific measures** within the meaning of Articles 17 and 18 of the ZVarD.

All ministries, their constituent bodies, and government offices submitted responses to the enquiry.

**Table: Overview of general and specific measures by individual ministries and government offices in 2025, as reported by each ministry and government office**

	<b>Ministries and government offices (in alphabetical order)</b>	<b>General measure</b>	<b>Special measure</b>
1	Ministry of Labour, Family, Social Affairs and Equal Opportunities (MDDSZ)	x	x
2	Ministry of Digital Transformation (MDP)		
3	Ministry of Finance (MF)		x
4	Ministry of the Economy, Tourism and Sport (MGTSŠ)	x	
5	Ministry of Infrastructure (Mzi)	x	x
6	Ministry of Public Administration (MJU)	x	
7	Ministry of Agriculture, Forestry and Food (MKGP)	x	
8	Ministry of Cohesion and Regional Development (MKRR)	x	
9	Ministry of Culture (MK)	x	x
10	Ministry of Natural Resources and Spatial Planning (MNVP)		
11	Ministry of the Interior (MNZ) and the Police	x	x
12	Ministry of Defence (MORS)	x	x
13	Ministry of the Environment, Climate and Energy (MOPE)		
14	Ministry of Justice (MP)	x	x
15	Ministry of a Solidarity-Based Future (MSP)	x	x
16	Ministry of Higher Education, Science and Innovation (MVŠZI)	x	x
17	Ministry of Education (MVI)	x	x
18	Ministry of Health (MZ)	x	
19	Ministry of Foreign and European Affairs (MZEZ)	x	x
20	Office of the Government of the Republic of Slovenia for National Minorities (UN)	x	x
21	Government Office for the Support and Integration of Migrants (UOIM)	x	x
22	Office of the Government of the Republic of Slovenia for Slovenians Abroad (USZS)	x	x

### 8.3 Research activities

In accordance with indent one of Article 21 of the ZVarD, the Advocate has the task and power to carry out independent research, the purpose of which is to determine the situation of persons or groups of persons with certain personal grounds. The results of any analytical or research work relating to discrimination constitute equality data.

The Advocate carries out its research activities, including the related monitoring of the general situation in the field of protection against discrimination in the country (indent six of Article 21 of the ZVarD) at three levels of complexity:

- At the level of special reports aimed at describing the situation of groups of persons with certain personal grounds, generally within one of the areas of social life as defined by the ZVarD. In accordance with Article 22 of the ZVarD, the Advocate reports to the National Assembly on the existence of discrimination against individual groups of persons with certain personal grounds.
- At the level of research, where the objective is to obtain, through scientific methods, a more comprehensive understanding of a specific social issue (e.g., public attitudes towards social groups with certain personal grounds).
- At the level of analyses, where the focus is on examining and identifying the key characteristics of a more limited or more concrete issue related to discrimination.

In 2025, the Advocate published **one special report**:

- **Special report entitled *Challenges in the Education of Roma Children and Youth***

In 2025, the Advocate conducted **one independent survey**:

- **Public opinion survey on discrimination in the Republic of Slovenia in 2025.**

In 2025, the Advocate conducted **one extensive analysis**:

- **Review of the 2024 Annual Report of the Human Rights Ombudsman by personal grounds, from the perspective of the Advocate of the Principle of Equality's competences**

### 8.4 Education, awareness-raising and information

For the purpose of educating, raising awareness among, and informing the general public and selected target audiences, the Advocate carried out a range of activities over the past year. In terms of their content and objectives, these activities are consistent with the legal provision set out in **indent five of Article 21 of the Protection Against Discrimination Act (ZVarD)**, which defines raising the awareness of the general public about discrimination and measures to prevent it as one of the Advocate's tasks and powers. Within the scope of this task, the Advocate also includes the education of target audiences, awareness raising through the organisation of and participation in professional events and fairs, and the publication of its own materials. In addition, the Advocate carries out the task of educating and raising awareness on protection against discrimination and measures to prevent it through media communications, publications on its website, social media, its YouTube channel, and a newly launched podcast.

#### Education

Education in the fields of ensuring human rights and protection against discrimination is fundamental to their effective observance. Over the past year, the Advocate focused on educating and training those segments of the public that are well placed to further disseminate this knowledge and information through their own channels to their target groups as well as to the general public. These efforts are directed at experts, public employees, social partners, public sector institutions and organisations, and non-governmental organisations.

The Head of the Advocate, Miha Lobnik, and other members of staff prepared and/or delivered **17 educational activities** for various target audiences, either online or in person at locations across Slovenia.

#### Awareness-raising through the organisation of own events

By organising its own events, the Advocate raises public awareness about discrimination and measures to prevent it. In 2025, the Advocate organised a three-day international conference entitled "The (R)evolution of Equality Law: Reflecting on 25 Years of Anti-Discrimination Law in Europe & Beyond" in cooperation with the Berkeley Center on Comparative Equality & Anti-Discrimination Law at the University of California, Berkeley School of Law (the Center) and the Faculty of Law, University of Ljubljana. The conference took place at the Faculty of Law from 2 to 4 July 2025.

The conference programme comprised five plenary panels, 39 workshops and 135 presentations, delivered by internationally recognised experts in the fields of equality law and protection against discrimination.

The keynote addresses were delivered by:

- Dr Neža Kogovšek Šalamon, Vice President of the Constitutional Court and one of Slovenia's leading experts in equality and anti-discrimination law,
- Nika Kovač, Director of the 8th of March Institute, who presented the challenges of leading campaigns aimed at strengthening the protection of fundamental rights,
- Dr David Oppenheimer, Director of the Berkeley Center and Professor of Law, who focused on what is termed the war on diversity, equality, and an inclusive society currently taking place in the United States.

Recordings of all three keynote addresses are available on the Advocate's YouTube channel<sup>19</sup>.

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<sup>19</sup> <https://www.youtube.com/@zagovornik>

During the workshops, representatives of the Advocate participated with their expert contributions.

- In the plenary session of the conference on the experiences and achievements of equality bodies, Miha Lobnik, Head of the Advocate, participated along with the heads of the Swedish, Belgian, and Austrian equality bodies and presented the development of the Slovenian equality body and its good practices.
- Miha Lobnik and the Advocate's representative Mitja Blažič presented the history of Slovenia's progress in achieving legal equality for same-sex civil partnerships.
- Boštjan Vernik Šetinc, a representative of the Advocate, presented the issue of voting rights for persons with intellectual and psychosocial disabilities.
- Nevenka Prešlenkova, also a representative of the Advocate, presented the *Special Report: For the Implementation of the Rights of All Persons with Disabilities in Slovenia*.

The conference hosted more than 150 experts in the field of anti-discrimination law from around the world.

### **Awareness-raising through own publications**

In addition to its regular annual report on its activities, the Advocate also publishes special reports and other publications. The purpose of these publications is to raise awareness among target audiences about protection against discrimination and the Advocate's role in this field. The Advocate distributes these publications on various occasions, at events it organises or in which it participates. Ensuring that people understand the concepts of discrimination and equality, are aware of the available legal remedies in cases of discrimination, and are familiar with other provisions of the ZVarD, is a prerequisite for the effective prevention and elimination of discrimination.

In 2025, the Advocate published the following publications:

1. Regular Annual Report for 2024 (in Slovenian)
2. Special Report: Challenges in the Education of Roma Children and Youth (in Slovenian)
3. Special Report: For the Implementation of the Rights of All Persons with Disabilities in Slovenia (summary in easy-to-read format)
4. Brochure: The Evolution of the Advocate of the Principle of Equality, Slovenian Equality Body (in English)<sup>20</sup>
5. Special Report: Non-Accessibility of Public Inter-Urban Bus Transport for Mobility-Impaired Persons (reprint)
6. Special Report: For the Implementation of the Rights of All Persons with Disabilities in Slovenia (reprint)

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<sup>20</sup> Slovenian translation: Razvoj Zagovornika načela enakosti, slovenskega organa za enakost. Prepared for an international conference on anti-discrimination law co-organised by the Advocate, in July 2025. Available at: <https://zagovornik.si/wp-content/uploads/2025/12/ZNEvolution.pdf>

### Information

The Advocate informs the public about all its activities through its official website, social media platforms such as Facebook, X and Instagram, and media appearances.

In 2025, the Head of the Advocate's Office, Miha Lobnik, appeared in a total of 24 television, radio and online programmes. The Advocate received 43 journalistic inquiries relating to current social issues, alleged cases of discrimination, and matters addressed by the Advocate. A total of 46 press releases were issued, presenting cases of discrimination under consideration, assessments of discriminativeness of regulations, recommendations, research conducted, special reports and other current issues within the scope of the equality body's work.

On the website [www.zagovornik.si](http://www.zagovornik.si), 51 news items on the Advocate's activities were published. The Advocate's YouTube channel (@zagovornik)<sup>21</sup> features recordings of round tables, awareness-raising advertisements and media appearances. Episodes of the Advocate's podcast are also published on the YouTube channel.

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<sup>21</sup> Available at <https://www.youtube.com/@zagovornik/videos>

## 8.5 Cooperation with civil society

Non-governmental organisations, social partners and other civil society organisations represent an important form of citizen participation in the management of public affairs. Many of these organisations implement programmes and projects in the public interest in key areas, such as ensuring equality, equal opportunities and protection against discrimination. Civil society organisations identify problems and needs in the country and in society at both the individual and systemic levels, and act as important links between individuals and public structures. They also make a significant contribution to effectively raising awareness of, and addressing issues related to, equal treatment, the protection of human rights and fundamental freedoms through advocacy and direct support for discriminated persons.

For the Advocate, civil society organisations are important strategic partners in monitoring the situation in the field of protection against discrimination in the country (**Article 21 of the ZVarD**) as well as in formulating solutions and proposals for the implementation of measures. In accordance with **Article 15 of the ZVarD**, when devising solutions and proposals to attain the purpose of the ZVarD, the Advocate cooperates with non-governmental organisations, social partners and other civil society organisations operating in the fields of equal treatment, the protection of human rights and fundamental freedoms, the protection of vulnerable groups against discrimination, or providing legal or social assistance to persons discriminated against. Progress in the areas of equality, equal treatment and equal opportunities has historically been linked to the activities of civil society and numerous non-governmental organisations, which are most familiar with the situation of vulnerable groups and the actual status of their rights in practice. The active role of non-governmental organisations is clearly defined in European Union directives and the recommendations of the Council of Europe. Non-governmental organisations and civil society constitute a valuable source of information for government structures, public administration and other decision-makers in the field of systemic protection against discrimination.

**In 2025, the Advocate actively cooperated with more than 71 civil society organisations.**

The forms of cooperation were as follows:

1. The Advocate's enquiries in the preparation of surveys, analyses and special reports, assessments of discriminativeness of regulations and discrimination investigation. The Advocate made enquiries with more than nine non-governmental organisations.
2. Responses by the Advocate to enquiries from civil society organisations. The Advocate issued responses to eleven different enquiries submitted by non-governmental organisations.
3. Meetings with civil society organisations. The Advocate took part in eight meetings with representatives of various organisations.
4. Information and awareness-raising activities. Together with the Faculty of Law of the University of Ljubljana, the Advocate co-organised a major awareness-raising event, actively participated in 11 additional events and attended three further events organised by civil society organisations.
5. Educational activities. The Advocate prepared six educational events for civil society organisations.
6. Letters of support for projects of civil society organisations. The Advocate supported 23 projects of non-governmental organisations.

## 8.6 Cooperation at the national level

The activities presented in this chapter pursue several objectives arising from the powers and tasks of the Advocate laid down in the ZVarD. These activities are principally focused on:

- Monitoring the overall situation in Slovenia in the field of protection against discrimination (Article 21 of the ZVarD), including maintaining a dialogue with national institutions and civil society;
- Presenting the regular annual report on the Advocate's work, which is submitted each year to the National Assembly, the National Council, the Slovenian President, the Government and other bodies within state administration and the public sector, in accordance with Article 22 of the ZVarD;
- Raising awareness among the general public about discrimination (Article 21 of the ZVarD).

The most common forms of cooperation included working meetings with senior state representatives as well as operational meetings with ministers, state secretaries, other representatives of ministries and government offices, and representatives of other state bodies. At these meetings, the Head of the Advocate presented the work of the equality body on the basis of the Regular Annual Report for the previous year and by highlighting common topics falling within the scope of work of the various institutions and the Advocate.

### 1. President of the Republic of Slovenia

On 28 May 2025, Miha Lobnik presented the Regular Annual Report to the President of Slovenia, Dr Nataša Pirc Musar, and outlined the Advocate's activities for 2024.

In the discussion with the President, the Head of the Advocate emphasised that advisory support had been provided to 550 individuals and that more than 100 recommendations for prevention or elimination of discrimination had been issued. He also noted that two important court judgments in the field of protection against discrimination were issued during the year, confirming the professional work of the Advocate's team.

The Advocate exercised its statutory powers and, in 2021, filed a request for a constitutional review of the Infertility Treatment and Biomedically Assisted Reproductive Procedures Act, on the grounds of discriminatory treatment of women based on marital status. In October 2024, the Constitutional Court upheld the Advocate's position. Moreover, the Supreme Court, through its decision, confirmed the soundness of the Advocate's legal reasoning in cases concerning discrimination found related to Christmas bonuses.

President Pirc Musar thanked the Head of the Advocate for the Advocate's work in promoting the principle of equality, protecting human dignity and strengthening a just society. She emphasised that the Advocate's contribution to a society in which every individual is heard and respected, regardless of personal grounds, is of exceptional importance. By constantly drawing attention to discrimination and promoting collective responsibility, the Advocate helps build an environment in which diversity is not an obstacle, but an asset.

## 2. National Assembly of the Republic of Slovenia

On 11 March 2025, the Head of the Advocate, Miha Lobnik, presented the Advocate's Annual Report for 2024 to the President of the National Assembly, Mag Urška Klakočar Zupančič.

During the meeting, Lobnik stated that protection against discrimination lies at the heart of ensuring human rights. He explained that the Advocate's mission is to help build a society in which all individuals, regardless of personal grounds, are treated with equal respect and dignity. The President of the National Assembly emphasised the importance of mutual respect and a zero-tolerance approach to all forms of discrimination.

### National Assembly Committee on Labour, Family, Social Affairs and Disability

- 16 September 2025 – Presentation of the Regular Annual Report of the Advocate of the Principle of Equality for 2024.
- 12 December 2025 – Presentation of the Advocate of the Principle of Equality's positions on the Proposal for the Act Amending the Social Assistance Act.

### National Assembly Commission for Petitions, Human Rights and Equal Opportunities

- 12 February 2025 – Cooperation in the agenda item on the right to personal assistance.
- 5 November 2025 – Presentation of the Advocate's response to the 30th Annual Report of the Human Rights Ombudsman of the Republic of Slovenia for 2024, together with the Report of the Human Rights Ombudsman of the Republic of Slovenia on the Implementation of Tasks of the National Preventive Mechanism under the Optional Protocol to the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment for 2024.
- 19 September 2025 – Cooperation in the agenda item on the State's responsibility for providing and financing the health of children with rare diseases.

### National Council of the Republic of Slovenia

- 16 April 2025 – Presentation of the Regular Annual Report of the Advocate of the Principle of Equality for 2024.

### National Council Commission for Social Care, Labour, Health and the Disabled

- 10 April 2025 – Presentation of the Regular Annual Report of the Advocate of the Principle of Equality for 2024.
- 4 December 2025 – Presentation of the Special Report of the Advocate of the Principle of Equality: *Challenges in the Education of Roma Children and Youth*.
- 11 December 2025 – Presentation of the Advocate of the Principle of Equality's position on the Proposal for the Act Amending the Social Assistance Act.

### 3. Government of the Republic of Slovenia

#### **Government Council for Monitoring the Implementation of the Strategy of the Republic of Slovenia on Combating Anti-Semitism up to 2033**

A representative of the Advocate attended the first meeting of the newly established Government Council on 5 March 2025. During the meeting, members were briefed on the Council's tasks, reviewed the measures outlined in the Strategy, discussed stakeholders' plans for their implementation, and agreed on a timeline for reporting to the Government. They also addressed current challenges in combating antisemitism, including legislative and preventive measures, education, and the roles of institutions and Jewish communities. The Council further adopted conclusions regarding its future work, reporting procedures and public information on its existence and composition.

#### **National strategic plans for protection against discrimination in specific areas**

The European Commission (EC) has adopted six key strategic documents to combat discrimination against specific vulnerable groups, including:

1. A Union of Equality: EU Roma strategic framework for equality, inclusion and participation,<sup>22</sup>
2. A Union of Equality: Strategy for the rights of persons with disabilities 2021-2030,<sup>23</sup>
3. A Union of Equality: Gender Equality Strategy 2020–2025,<sup>24</sup>
4. A Union of Equality: EU Anti-racism action plan 2020-2025,<sup>25</sup>
5. A Union of Equality: LGBTIQ Equality Strategy 2020–2025<sup>26</sup> and
6. EU Strategy on combating antisemitism and fostering Jewish life (2021–2030).<sup>27</sup>

These are the European Union's (EU) fundamental strategic guidelines for ensuring equality, equal status and equal opportunities for specific social groups defined by certain personal grounds across various areas of social life. Member States are expected to follow these guidelines when preparing national strategic plans and, consequently, when designing policies and measures aimed at guaranteeing equal opportunities for members of these groups.

On 15 September 2022, the Advocate sent a recommendation to the Office of the Prime Minister proposing that the Government adopt national strategic plans for protection against discrimination in specific areas where such plans were still lacking. The Advocate also recommended the establishment of a single coordination point at government level (within a ministry, office, or other organisational unit), whose primary task would be to prepare, adopt and monitor the effectiveness of the implementation of national policies for the comprehensive prevention and elimination of discrimination and the promotion of equal opportunities.<sup>28</sup> On 12 December 2022, in response to the recommendation, the Government informed the Advocate that it is "...actively exploring opportunities to establish a single coordination point to coordinate national policies for the prevention and elimination of discrimination and the promotion of equal opportunities."

<sup>22</sup> Available at: <https://eur-lex.europa.eu/legal-content/SL/ALL/?uri=CELEX:52020DC0620>

<sup>23</sup> Available at: <https://eur-lex.europa.eu/legal-content/SL/TXT/PDF/?uri=CELEX:52021DC0101&from=SL>

<sup>24</sup> Available at: <https://eur-lex.europa.eu/legal-content/SL/TXT/?uri=CELEX%3A52020DC0152>

<sup>25</sup> Available at: <https://eur-lex.europa.eu/legal-content/SL/TXT/?uri=CELEX:52020DC0565&qid=1606229167624>

<sup>26</sup> Available at: <https://eur-lex.europa.eu/legal-content/sl/TXT/?uri=CELEX%3A52020DC0698>

<sup>27</sup> Available at: <https://eur-lex.europa.eu/legal-content/SL/TXT/?uri=CELEX%3A52021DC0615>

<sup>28</sup> Available at: <https://zagovornik.si/izdelki/priporocilo-glede-priprave-nacionalnih-strateskih-nacrtov-za-varstvo-pred-diskriminacijo/>

At the beginning of 2026, during the editorial phase of the annual report for 2025, Slovenia had adopted four of the six planned national strategic plans:

1. The Action Plan for Disabled Persons 2022-2030, adopted on 14 October 2021,<sup>29</sup>
2. The National Programme of Measures for Roma 2021–2030, adopted on 23 December 2021,<sup>30</sup>
3. The Resolution on the National Programme for Equal Opportunities for Women and Men 2023–2030, adopted on 22 September 2023<sup>31</sup> and
4. The Strategy of the Republic of Slovenia on Combating Antisemitism until 2033, adopted on 21 December 2023.

According to the Advocate, the National Strategic Plan for LGBTIQ persons has still not been adopted as at early 2026. Moreover, there is still no publicly available information indicating that a national strategy to combat racism is currently under development.

Likewise, there are no publicly available data suggesting any possible progress in establishing a single national coordination point for anti-discrimination policies. This points to the absence of an active systemic state policy in this area.

**In 2025, within the framework of meetings with ministers, the Head of the Advocate's Office, Miha Lobnik, met with:**

- The Minister of the Interior, Boštjan Poklucar,
- The Minister of a Solidarity-Based Future, Simon Maljevac,
- The Minister of Education, Vinko Logaj, and
- The Minister of Higher Education, Science and Innovation, Dr Igor Papič.

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<sup>29</sup> Available at: <https://www.gov.si/zbirke/projekti-in-programi/akcijski-program-za-invalidne/>

<sup>30</sup> Available at: <https://www.gov.si/novice/2021-12-28-vlada-je-sprejela-nacionalni-program-ukrepov-za-rome-za-obdobje-20212030/>

<sup>31</sup> Available at: <https://www.gov.si teme/enakost-zensk-in-moskih/>

## 9 INTERNATIONAL COOPERATION

The international cooperation of the Advocate is partly defined by the ZVarD, which in **indent nine of Article 21** assigns the Advocate the task of ensuring the exchange of available information on discrimination with the bodies of the European Union (EU). However, the Advocate's activities at the international level are considerably broader and include:

- Cooperation within various multilateral organisations;
- The exchange of information on best anti-discrimination practices;
- International training programmes addressing current challenges in protection against discrimination;
- Joint planning of responses to these challenges; and
- Cooperation with international mechanisms for monitoring the implementation of Slovenia's international obligations in the fields of protection against discrimination and human rights protection.

The importance of the international activities of equality bodies, as well as the responsibility of EU Member States to facilitate such cooperation, is also emphasised in the European Commission (EC) Recommendation on standards for equality bodies.<sup>32</sup>

International cooperation significantly contributes to the visibility of the institution across Europe and to the development of the Slovenian equality body, both in terms of advancing anti-discrimination law and shaping policies aimed at protecting against discrimination and promoting equality.

In 2025, the Advocate carried out **64 international activities**, including participation in expert consultations, conferences and other events, held either in person or online, as well as information exchanges. These activities comprised:

- Seven meetings within the working groups of the European Network of Equality Bodies (Equinet) and 18 other events organised or co-organised by Equinet,
- Six events within the EU and organisations under its auspices;
- Two events within the Council of Europe;
- One event under the auspices of the United Nations;
- 12 other international professional events;
- 18 mutual exchanges of information aimed at monitoring international practices in the field of protection against discrimination.

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<sup>32</sup> Commission Recommendation (EU) 2018/951 of 22 June 2018 on standards for equality bodies, point 1.3 (3).

## International exchange of information on discrimination

Under indent nine of Article 21 of the ZVarD, the Advocate is tasked with ensuring the exchange of available information on discrimination with the bodies of the European Union. In practice, however, the Advocate's exchange of views and information is considerably broader and extends to a wide range of international actors, with whom the Advocate communicates in the context of their enquiries and research activities. A specific form of exchange of views takes place within the Equinet Equality Law in Practice Working Group, which is dedicated to the exchange of views and information on issues encountered by the members of Equinet in the course of their work. In addition, the Advocate actively engages in the exchanges of views and information with other international governmental and non-governmental organisations.

In 2025, the Advocate carried out **a total of 18 mutual information exchanges** in the field of protection against discrimination:

- The Advocate responded to 17 requests for information on how particular areas are regulated in Slovenia (14 responses provided within the Equinet Equality Law in Practice Working Group and three responses submitted through other international exchanges or questionnaires from various international organisations);
- The Advocate submitted one request, comprising two questions, seeking information on the regulation of specific issues in other countries, within the Equinet Equality Law in Practice Working Group.

### Sent requests for information

The Advocate submitted an enquiry containing two questions on the application of anti-discrimination legislation in the field of sport to the Equinet Equality Law in Practice Working Group and requested the opinions and experiences of other institutions.

The enquiry concerned two cases.

The first related to a recreational running event open to all participants upon payment of an entry fee, in which the organiser allowed women to register only for the 5 km distance, while men could register only for the 10 km distance. The second case concerned an alleged instance of discrimination against an 11-year-old girl who competed in the U-11 category (with younger boys) at the national BMX championship, because a separate category for girls was not organised due to an insufficient number of female participants (the minimum required being four).

The Advocate received five substantive responses – from equality bodies in Lithuania, Sweden and the Czech Republic, as well as from two equality bodies in Austria.

## **Annual Report of the Advocate of the Principle of Equality for 2025 – Selected Chapters**

### **Issued by**

The Advocate of the Principle of Equality of the Republic of Slovenia

### **On behalf of the Advocate**

Miha Lobnik, Head of the Institution, Advocate of the Principle of Equality

### **Editor**

Mag Karmen Merlov

### **Contributors**

Miha Lobnik, Mag Karmen Merlov, Majda Hostnik, Mag Jelena Aleksić, Mateja Galič, Mag Simona Hribar Motore, Mitja Blažič, Mag Eva Cankar Farkaš, Aljoša Gadžijev, Eva Gračanin, Katja Grubar, Črt Kaker, Petra Klepec, Dr Matevž Kokol, Mag Anže Krajnc, Urška Osterc, Sergeja Oštir, Nevenka Prešlenkova, Anja Remic, Mojca Šmid, Boštjan Vernik Šetinc, Denis Vičič, Mateja Zobarič Trplan

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