



REPORT

**submitted by the People's Advocate Office to the UN Committee on the
Elimination of Discrimination against Women (CEDAW), under the
Convention on the Elimination of All Forms of Discrimination against
Women, for its pre-session working group for the 93rd session
(7–11 July 2025)**

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Abbreviations

CEDAW – Convention on the Elimination of All Forms of Discrimination against Women

ILO – International Labor Organization

GD – Government Decision

NHIC – National Health Insurance Company

NHRI – National Human Rights Institution

NPM – National Mechanism for the Prevention of Torture

PAO – People's Advocate Office

UNFPA – United Nations Population Fund



Role of the People's Advocate Office (Ombudsman Institution)

The People's Advocate Office is the only National Human Rights Institution (NHRI) in the Republic of Moldova with a constitutional mandate, as established by Article 59¹ of the Constitution. Its functioning is governed by Law No. 52/2014, which outlines its principles, guarantees of independence, and mandate execution. The institution consists of two ombudsmen, including one dedicated specifically to the protection of children's rights and freedoms.

Complementarily, Chapter V of the law regulates the National Mechanism for the Prevention of Torture (NPM), aligned with the Optional Protocol to the Convention against Torture. The NPM operates through a Council within the PAO, composed of experts from civil society, and carries out preventive visits to places of deprivation of liberty, such as prisons and psychiatric hospitals.

Since 2023, the OAP holds “A” status accreditation from GANHRI, confirming full compliance with the Paris Principles. However, recommendations from the Sub-Committee on Accreditation remain unimplemented as of 2025, as: **1) Insertion of the aspects of ensuring pluralism and diversity in the constitutive law of the PAO; 2) Adequate funding of the institution so that it can fulfill its mandated activities and be at the same comparable level of salaries for PAO officials as officials in other public institutions.** Although PAO also has 72 staff, 46 persons (28 women and 18 men) are employed, i.e. only 63% of the posts are filled due to financial constraints, low salaries, and limited budget. In 2024, more than 20% of the total budget of the institution was funded from donors and partners, which is not enough anyway. These limitations hinder the NHRI's ability to fully carry out its mandate. **3) Removal of provisions limiting the Ombudsman's immunity and return to previous provisions.** Although in the State's Periodic Report No. 7¹, in paragraph 59, the State mentions that in February 2023, the legal framework of the OAP was adapted to the latest international trends and standards, including by improving the selection, appointment and dismissal procedures, as well as by expanding the powers of the institution, the Sub-Committee on Accreditation expressed reservations about some of these changes.

Specifically, the removal of parliamentary consent for initiating criminal proceedings against the Ombudsman was seen by the Subcommittee as a threat to institutional independence. It recommended restoring the previous safeguards to better protect the Ombudsman from external pressure and procedural abuse.

In addition to the challenges addressed, for the first time, the PAO was confronted with actions that can be characterized as attempts to interfere in NHRI's work. In March 2025, the Ombudsman condemned the General Prosecutor's attempts² to discredit PAO. His request to amend a special report, which highlights problems of both an individual and systemic nature, and includes

¹ https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW%2FC%2FMDA%2F7&Lang=en

² <https://ombudsman.md/avocatul-poporului-ceslav-panico-condamna-acuzatiile-si-limbajul-utilizat-de-procurorul-general-in-raport-cu-institutia-ombudsmanului/>



recommendations to remedy them, raised serious concerns. Such a case also occurred in 2024³, when following the dispatch of a special report with a set of recommendations, the Chief of the General Inspectorate of Police subsequently sent an official letter challenging certain findings of the report, requesting its amendment and the removal of public communications on the subject, threatening legal action in case of non-compliance.

In order to mitigate and prevent such actions, the Ombudsman has submitted official letters with an appeal for support, both to national authorities, such as the Parliament, the Government, the Superior Council of Prosecutors, etc., as well as to regional and international organizations.

³ <https://ombudsman.md/reactia-avocatului-poporului-privind-imixtiunea-in-activitatea-sa-si-subminarea-garantiilor-de-independenta/>



Introduction

The PAO submits its contribution to the UN Committee on the Elimination of Discrimination Against Women (CEDAW), under the Convention on the Elimination of All Forms of Discrimination Against Women, for its pre-sessional working group for its 93rd session from July 7 to July 11, 2025.

This report includes findings and recommendations resulting from the PAO's mandate activities, such as: monitoring (visits) in the field, investigation of individual complaints submitted to the PAO, *ex officio* referrals in the context of issues with major social impact or systemic problems, examination of legislation and public policies in the light of the standards set out in CEDAW. Thus, the report is systematized into specific themes by groups, with reference to the articles of the Convention, such as: the situation of women with disabilities, women in places of deprivation of liberty, refugee women, children exposed to violence, with a focus on girls. It is certain that the Ombudsman draws attention to the most pressing problems at national level in the context of CEDAW implementation and puts forward structural recommendations to improve the situation in this area.

As mentioned, given the ability to review individual applications, the PAO is a quasi-judicial institution. Thus, according to internal statistical data **from 2024 to the current period 2025, out of the total number of applications in which the person declared gender, about 37.5% are filed by women.** For the most part, women apply to the PAO regarding alleged violations related to access to justice, right to work, right to education, right to social assistance and social protection

The data of the **Study on Perceptions of Human Rights in the Republic of Moldova prepared by the People's Advocate Office in 2023⁴**, reflects that 60.4% of the respondents believe that women's rights are respected in the Republic of Moldova. In 2020, 58% shared this view, and in 2018 - 48.9%. There is a noticeable increase in the perception of respect for women's rights in Moldova. However, the data show that the women surveyed in lower proportions believe that their rights are respected.

In the context of women's enjoyment of certain rights, 57.3% of the respondents consider that women are ensured to a very or very great extent the right to health protection, 58.3% - the right to work, 41.9% - the right to a fair trial. In general, the majority of respondents, 74.6%, believe that women have the same opportunities for professional and personal fulfillment as men. Although it is observed that the perception of the population is becoming more and more positive regarding the provision of women's rights from one period to another, **however, in the context of the field visits carried out in the period 2022 -2025 by the PAO**, a set of problems systematically faced by women and girls are observed, such as: early marriages among Roma ethnic groups affecting girls in particular and perpetuating cycles of social and educational exclusion; inequitable salaries of social workers (often women) reflecting a systemic undervaluation of the work provided; excessive duration of forensic psychological and psychiatric expertise delaying access to justice for women and girls victims of violence; inaccessible infrastructure for women with disabilities to public institutions; multiple cases of domestic violence.

⁴ <https://ombudsman.md/studiu-perceptii-asupra-drepturilor-omului-in-republica-moldova-in-2023/>



Additionally, the Ombudsman highlights the restricted access and the lack of monitoring mechanisms in the Transnistrian region hinder the assessment of the real situation of women's rights, especially those of vulnerable women. This problem is exacerbated by the absence of an integrated national system of disaggregated data collection, affecting the capacity of institutions to act effectively and develop evidence-based policies. These issues will be addressed in detail in the report.

Regulatory and public policy framework (Art. 2 and 3 of the Convention)

The legislative framework ensures gender equality and prohibits discrimination against women, but the main challenge lies in effectively implementing these provisions to prevent and reduce discrimination in all its forms. According to the Study on Perceptions of Human Rights in the Republic of Moldova in 2023⁵, mentioned above, of the people who faced violations of their rights, most frequently, at the level of 70 - 80% appealed to claim their rights to equality and non-discrimination and the right not to be discriminated against persons with disabilities.

In combating the phenomenon, the state authorities have continued to adopt legislative measures relevant to the field of non-discrimination, among the most recent being: Law no. 180/2024 for the amendment of some normative acts (equal access to goods and services for women and men), which strengthened Law no. 5/2006 on ensuring equal opportunities between women and men; Law no. 440/2023 for the ratification of ILO Convention no. 190 on violence and harassment in the world of work, (entered into force on March 19, 2025). Also, the ratification of some provisions of the European Social Charter (revised) by Law No. 185/2024 strengthened the protection of social rights, including the right to work. However, the Ombudsman points out that Article 4 was partially ratified, with only paragraph 2 being included, while paragraph 1, on the right to a wage sufficient for a decent living for both workers and their families, was omitted, despite the 2023 recommendations. In this regard, the Ombudsman recommends full ratification of Article 4 of the European Social Charter (revised).

Also in the context of ensuring the right to work, the participation of women with family responsibilities in the labour market has increased, supported by improved childcare services, more flexible childcare leave, and amendments to the Labour Code introducing flexible work arrangements. Despite this progress, significant discrepancies persist between female-dominated fields (education, health, social work, journalism, arts) and male-dominated fields (agriculture, construction, science, technology, engineering, mathematics).

Violence against women. Analysis of data on crimes committed in a domestic context in 2024⁶ reveals an alarming imbalance in the distribution of victims, with an overwhelming impact on women. Out of a total of 1575 persons affected by crimes categorized as: domestic violence, intentional homicide, rape, non-consensual sexual acts, failure to comply with the measures of the protection order for victims of domestic violence, more than 75% (1195 persons) are women. Alongside them, 217 child victims and 163 male victims were also identified. These figures clearly

⁵ <https://ombudsman.md/studiu-perceptii-asupra-drepturilor-omului-in-republica-moldova-in-2023/>

⁶ https://anpcv.gov.md/sites/default/files/2025-04/scvd_nota_12_luni_2024_8.pdf



highlight that women continue to be the main victims of domestic violence, being disproportionately exposed to serious forms of physical, psychological or sexual abuse.

Also in the context of preventing and combating violence against women, the People's Advocate welcomes the Government's approval of Draft Law No. 70 of 06.03.2025⁷, aimed at strengthening protection against domestic and gender-based violence, in line with international standards, including the Istanbul Convention. Key measures include recognizing digital violence, extending restraining and protection orders, criminalizing forced marriage and stalking (including online), increasing penalties for sexual harassment etc.

Women with disabilities

Women in psychiatric institutions. In its Special Report on Violent Deaths at the Balti Psychiatric Hospital on September 10, 2022⁸, OAP found that a serious problem remains the lack of reasonable accommodation for patients admitted under rigorous restraint, where they are placed with voluntary patients, affecting safety and treatment. Also, the lack of formal criteria for the application of restraint leads to arbitrary decisions, exposing female inpatients in particular to disproportionate measures in the absence of gender-sensitive safeguards. However, the Ombudsman noted progress in this area: the approval of procedures on the management of violent patients, staff training and the installation of surveillance cameras, although these do not cover all sensitive areas and alarm buttons only work in one hospital.

Health protection of women with disabilities. The report on the practical realization of sexual and reproductive rights by women and girls in Temporary Placement Centers for Persons with Disabilities (adults) and Psychiatric Hospitals in the Republic of Moldova in 2020⁹ highlighted that in the placement centers and psychiatric hospitals, disability is treated only medically, with women denied access to adapted information, contraception, trained doctors, and exposed to abuse and degrading treatment.

Deinstitutionalization. CEDAW Committee recommendations (2020) and the case of I.C. v. Republic of Moldova¹⁰ (ECHR, 2025) confirmed systemic deficiencies in the protection of women with disabilities, including exposure to forced labour, sexual abuse, and lack of support in the deinstitutionalization process. In the case of I.C v. Republic of Moldova, the Court found violations of Art. 3, 8, 4 and 14 ECHR. As highlighted by international bodies, deinstitutionalization requires a systemic transformation that goes beyond the closure of institutions and provides individualized support services, inclusive services and effective monitoring mechanisms. In the absence of such a

⁷ <https://justice.gov.md/ro/content/guvernul-sprijina-consolidarea-cadrului-legal-pentru-protectia-victimelor-violentei-familie>

⁸ <https://ombudsman.md/post-document/deces-violent-la-spitalul-de-psihiatrie-balti-2/>

⁹ https://idom.md/wp-content/uploads/2021/02/raport-reprorights-wwd-md_dis-2.pdf

¹⁰ [https://hudoc.echr.coe.int/?fbclid=IwY2xjawKIM_tleHRuA2FibQlXMAbIcmIkETfMRnJKUDVlQ044OEduTFf3AR512wPYf3vaZfhWFX6S_o9sAJqxHapZyeXGwq1cqw93N4NvMzTQ6GiUCra2Mw_aem_SY2sccZeDfQz9t4J_hOBN_g#{%22documentcollectionid2%22:\[%22GRANDCHAMBER%22,%22CHAMBER%22\],%22itemid%22:\[%22001-241986%22\]}](https://hudoc.echr.coe.int/?fbclid=IwY2xjawKIM_tleHRuA2FibQlXMAbIcmIkETfMRnJKUDVlQ044OEduTFf3AR512wPYf3vaZfhWFX6S_o9sAJqxHapZyeXGwq1cqw93N4NvMzTQ6GiUCra2Mw_aem_SY2sccZeDfQz9t4J_hOBN_g#{%22documentcollectionid2%22:[%22GRANDCHAMBER%22,%22CHAMBER%22],%22itemid%22:[%22001-241986%22]})



framework, the result may be a new form of institutionalization, camouflaged by superficial changes that maintain - or even aggravate - the risk of abuse and exploitation.

The OAP has documented cases of forced labour, degrading treatment, and intimidation of women with disabilities, including at the Bădiceni Placement Center, with the General Prosecutor's Office notified. These violations are consistent with previous OAP findings and journalistic investigations¹¹.

Although regulated by Article 67 of the Civil Code, the institution of the authorized guardian cannot function due to missing government regulations. This lack of systemic protection, along with institutional neglect, increases the vulnerability of women with disabilities to abuse and exploitation.

To monitor the rights of persons with disabilities, PAO proposed an independent mechanism under Article 33(2) of the UN Convention on the Rights of Persons with Disabilities, in partnership with OHCHR and representative organizations of persons with disabilities. Therefore, OAP recommends the State authorities to take measures to ensure adequate funding and strengthen PAO's capacity for its effective operation

Women - detained in prisons

Statistics. As of February 15, 2025, there were 5,862 persons deprived of their liberty in Moldova's prisons, 305 of them women (5.2%). Compared to 2020 (5.8%), there is a slight decrease in the proportion of women in detention.

Life imprisonment. From September 7, 2024, women in the Republic of Moldova can be sentenced to life imprisonment for exceptionally serious crimes. The amendment was introduced by Law No. 136/2024, which removes the previous legal exception prohibiting the application of this punishment to women and minors, thus aligning the Criminal Code with the principle of equality before the law. However, the adjustment of the criminal legislation on life imprisonment for women should have been consulted in a broader and participatory format. Applying life imprisonment to women may undermine the humanist purpose of criminal sanctions and Moldova's commitments to humane detention and women's protection. Current prison conditions—poor medical care, inaccessible infrastructure, limited family contact, and harmful living standards—highlight these concerns.

Prison conditions. The CEDAW Committee emphasized in its Concluding Observations in 2020¹² the need to improve detention conditions for women, in particular access to hygiene and health products. Although the new legislative proposals¹³ bring improvements in nutrition, rules on

¹¹ https://www.zdg.md/importante/video-beneficiarii-abuzului-batuti-cu-polonicul-in-cap-exploatati-prin-munca-pana-la-deces-si-abuzati-sexual-in-schimbultigarilor/?fbclid=IwY2xjawKIPsdleHRuA2FlbQlXMAbicmlkETfMRnJKUDVlQ044OEduTFF3AR512wPYf3vaZfhWFX6S_o9sAJqxHapZyeXGwg1cgw93N4NvMzTQ6GiUCra2Mw_aem_SY2sccZeDfQz9t4JhOBN_g

¹² <https://www.ohchr.org/en/documents/concluding-observations/committee-elimination-discrimination-against-women-concluding-2>

¹³ Draft GD no. HG228/2024 of 26.03.2024 on the approval of the minimum food standards, food substitution and provision of basic hygiene items for prisoners in penitentiary institutions.



personal hygiene remain inadequate. Point 15¹⁴ only provides for basic products in insufficient quantities. For example, the norm for intimate sanitary pads is only 10 per month, below the minimum needed to maintain dignity. In addition, it does not take into account the specific needs of women, such as pregnant or post-natal women, and the lack of essential products such as disinfectants or wet wipes makes the situation worse. Thus, the project ignores the physiological realities and specific needs of women deprived of their liberty, contrary to international recommendations.

Refugee women

To support the protection of displaced persons from Ukraine, the People's Advocate established an Advisory Council in March 2022¹⁵ to provide expertise and assistance. Council reports revealed increased risks of gender-based violence and abuse in refugee centers due to inadequate supervision and untrained staff. Additionally, unequal access to services, ethnic segregation, and discriminatory attitudes hinders the protection and integration of refugee women.

According to data from the UN Refugee Agency (Moldova)¹⁶, at the end of 2024, women accounted for 57.7% of the beneficiaries accommodated in centers for displaced persons. Between 2022 and 2024, they steadily constituted 60-62% of all refugees, with single mothers, pregnant women, elderly and disabled women being the most vulnerable.

According to the Thematic Report prepared by OAP on assessing the accessibility of essential health services for refugees in the Republic of Moldova¹⁷, refugee women have had partial access to health services, particularly sexual and reproductive care, through NHIC and UNFPA support. However, access remains limited due to legal uncertainties, bureaucracy, and lack of clear information, especially for women with disabilities or chronic illnesses.

In terms of professional integration, a thematic report questionnaire¹⁸ shows that 44.8% of refugee women consider low wages a major obstacle to employment and 15% cannot work because of caring responsibilities. Only 24% of respondents reported access to flexible working.

The People's Advocate highlights that refugee women face a triple intersectional disadvantage, influenced by gender, migration status and, in some cases, ethnicity. Despite this, Moldova's professional integration policies lack a gender-sensitive approach and fail to meet the complex needs of this group, contrary to CEDAW obligations.

In this regard, the Ombudsman recommends the authorities to align all interventions on gender-based violence with existing national policies, including the National Program to Prevent and

¹⁴ *Ibidem*, Annex no. 2 to GD no. 228/2024 Norms for providing prisoners with essential hygiene items.

¹⁵ <https://ombudsman.md/despre-noi/consiliul-consultativ-pe-refugiati/>

¹⁶ <https://app.powerbi.com/view?r=eyJrIjoibTBlODc2MTgtMWI4Ni00Y2NmLWJkMjgtMGM0Nzk5NmJkOTIzIiwidCI6ImU1YzM3OTgxLTkyNjQ0NDZlNC04YTBlLTkyNDNkMmFmODBiZSIsImMiOiJh9>

¹⁷ <https://ombudsman.md/post-document/raportul-avocatului-poporului-privind-evaluarea-accesibilitatii-serviciilor-esentiale-de-sanata-2/>

¹⁸ <https://ombudsman.md/post-document/raport-privind-monitorizarea-respectarii-drepturilor-persoanelor-refugiate-in-contextul-conflictului-armat-din-ucraina-pentru-perioada-ianuarie-iunie-2024-2/>



Combat Violence against Women and Domestic Violence for 2023-2027¹⁹, and promote the inclusion of refugees in these mechanisms; awareness-raising initiatives on the risks of violence and sexual exploitation; gradual integration of refugees into national social protection systems and the labor market, through inter-institutional collaboration and expanding access to services and rights. These steps are essential to fulfill Moldova's obligations under CEDAW, especially Articles 10–14.

Violence, exclusion and multiple vulnerabilities of minors

According to the Annual Report on the Observance of Human Rights and Freedoms in the Republic of Moldova in 2024, the level of violence and exclusion among children remains alarming. The Violence against children survey (VACS)²⁰ 2019 showed 37% experienced violence by age 18, with 14.4% of girls and 5.3% of boys facing sexual abuse—often unreported due to fear or lack of support.

In 2024, 399 children (mostly girls) were victims of sexual offenses, and in almost half of the cases, the perpetrators came from close circle - father, mother's partner or other people in the circle of trust. Online sexual abuse and exploitation is also on the rise, including cases where children were forced to send intimate images in exchange for goods or under threat.

At the same time, progress is being made in reducing the number of institutionalized children, in line with the National Agenda for Child Protection 2022-2026. However, challenges remain in providing alternative family-type care, especially for children with disabilities.

Another vulnerable group targeted in the report is Roma children, who face severe educational exclusion due to poverty, poor infrastructure, and discrimination. Roma girls are especially vulnerable to early marriage, school dropout, early pregnancy, and domestic violence.

These realities highlight the urgent need for integrated public policies that are sensitive to the multiple vulnerabilities of children from marginalized groups. Thus, the Ombudsman for the Rights of the Child has come up with several recommendations, such as the Ministry of Education and Research to strengthen the initial and continuous training of teachers in preventing and combating violence against children, including bullying; to develop their capacities in recognizing and intervening in cases of sexual abuse; and to revise the school curriculum to integrate comprehensive sexuality education and provide the necessary training for its effective implementation.

¹⁹ https://social.gov.md/wp-content/uploads/2023/03/Programul-VFF-si-VF_-15.03.2023_final.pdf

²⁰ <https://www.togetherforgirls.org/en/resources/moldova-vacs-report-2020>