

2024 Annual Report of the Equal Opportunities Ombudsperson of the Republic of Lithuania

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Foreword



As I present the 2024 Annual Report of the Office of the Equal Opportunities Ombudsperson, I would first like to sincerely thank Child Rights Ombudsperson Edita Žiobienė and Seimas Ombudsperson Jolita Miliuvienė, who substituted for me during my absence last year, as well as the entire team at the Office. Observing the Office's work from the outside was a new experience, but the team's dedication ensured the continued progress of essential equal opportunity efforts: investigations into complaints by residents, prevention of discrimination, analysis of issues

such as the digital exclusion of older people and the rights of transgender individuals, proposals for legislative improvements, mainstreaming equal opportunities in workplaces across the country, public events, and more.

In 2025, we will continue to pursue the strategic goal of strengthening equality across various sectors. Special attention will remain on tackling age discrimination – we will examine how institutions and organisations implement the recommendations issued by the Office. We will also actively combat discrimination based on skin colour, nationality, and ethnic origin – aided by e-learning tools and data from an ongoing study on discrimination in the housing rental sector. Another key theme for 2025 – one that is inseparable from the future – is artificial intelligence, along with its opportunities and challenges in ensuring equal opportunities.

We will focus heavily on equal opportunities and safe environments in the workplace. One of the key objectives for 2025 is the implementation of the “Women on Boards” Directive, which aims to improve gender balance in the management bodies of large companies and publicly listed enterprises. The Directive's implementation will mark a significant step toward gender equality in decision-making processes. As part of our ongoing analysis of the situation of transgender people in Lithuania, we will publish a comprehensive study on their experiences in the labour market and develop measures to prevent sexual harassment in the healthcare sector.

Disability-based discrimination remains one of the most common grounds for contact with the Office, and we will continue to devote close attention to it. This year, the Commission for the Monitoring of the Rights of Persons with Disabilities, operating under the Office, will also present its monitoring report. As before, we will actively pursue equal opportunity mainstreaming and monitor the development of new policy directions in this area.

We will also continue contributing to the reform of the legal framework to ensure that it meets the standards required of equality bodies, thereby significantly expanding the Office's mandate and ability to assist those who have experienced discrimination.

I believe that 2025 will bring not only new challenges, but also important changes – and the Office's team will work persistently to shape them.

**Equal Opportunities Ombudsperson
Birutė Sabatauskaitė**



Temporary assumption of the role of Equal Opportunities Ombudsperson at the turn of the year was a period of responsibility – together with the team at the Office, we not only concluded the work of 2023 but also prepared a comprehensive strategy for the new year. A particularly important milestone was the completion of a project dedicated to combating violence against women with disabilities. This initiative revealed the importance of addressing the experiences of women with disabilities – often invisible – who face not only a heightened risk of domestic violence but also considerable obstacles in accessing support after such incidents.

This period confirmed that every step forward in the field of equal opportunities requires consistent effort and perseverance. I am grateful to the entire team for our collective efforts towards achieving the goals we have set.

Child Rights Ombudsperson, acting as Equal Opportunities Ombudsperson
Edita Žiobienė

Intense and meaningful – such was the past year at the Office of the Equal Opportunities Ombudsperson. The active pace across diverse areas and topics of work is clearly reflected in the 2024 Annual Report.

Several significant overviews were prepared – including those highlighting the digital exclusion of older people in the context of technological development, as well as the situation of transgender individuals in Lithuania. I am pleased that our expert and research efforts have helped amplify the voices of these groups and address responsible institutions, as well as providers of goods and services, with clear messages and recommendations for improving the situation. Of course, preparing recommendations is only the first step. The real challenge lies in being heard – in fostering meaningful dialogue about their implementation.

The persistently high number and diversity of complaints and enquiries submitted to the Office confirm that inequality and discrimination remain pressing issues in Lithuania. In making decisions on potential discrimination, it was necessary to seek a balance between freedom of expression and the imperative of equal treatment for all. Investigations into harassment complaints were frequently hampered by the lack of necessary evidence. I consider this an important opportunity to stress that harassment – as one of the most serious and damaging forms of discrimination – must not be tolerated.

The complaints we receive also show that the protection of the rights of persons with disabilities, the assurance of accessibility, and the creation of suitable conditions across all areas of life remain goals that are still to be fully achieved – although progress is steadily and consistently being made.

Seimas Ombudsperson, acting as Equal Opportunities Ombudsperson
Jolita Miliuvienė



Equal Opportunities Indicators. Where Are We?

The Office of the Equal Opportunities Ombudsperson (hereinafter also referred to as ‘the Office’) begins its 2024 Annual Report with an overview of the equal opportunities situation in Lithuania. This section presents statistical data and various public research indicators relating to the field of equal opportunities. Only the latest available national and international data are discussed. The situation in previous years or data not updated in 2024 is presented in the 2023 and earlier Annual Reports of the Equal Opportunities Ombudsperson of the Republic of Lithuania¹.

Gender Equality

The European Institute for Gender Equality (EIGE) publishes an annual Gender Equality Index that measures progress on gender equality in European Union Member States. The Index is calculated by assessing equality between women and men across six domains: work, health, power, time, knowledge and money. In 2024, [Lithuania scored 65.8 points](#) out of a possible 100 (a score of 100 would indicate de facto gender equality across all domains measured by the Index). With a marginal improvement, Lithuania rose from 17th to 16th place among EU countries (EU average – 71 points). The main shift occurred in the domain of power: the number of women on the board of the Bank of Lithuania increased (in early 2023 there was one woman, while by early 2024 there were three²).

Lithuania’s strongest performance compared to other EU countries is in the domain of work – ranking 15th, with a score of 76.2 (EU average – 74.2). The country scores particularly highly for labour market participation by men and women (92.8 points) but receives a significantly lower rating for occupational segregation and quality of working conditions (62.5 points). The poorest performance is seen in the domain of money – Lithuania ranks 25th, with a score of 70.9.

¹ All Annual Reports of the Equal Opportunities Ombudsperson of the Republic of Lithuania are available online: <https://lygybe.lt/veiklos-sritys/metines-ataskaitos>.

Up-to-date gender equality data in Lithuania is available online: <https://lygiadieniai.lt/daugiau-apie-lyciu-lygybe/ka-rodo-lyciu-nelygybes-statistika>.

² At the beginning of 2025, only two women were serving on the Board of the Bank of Lithuania, as Jurgita Šaučiūnienė stepped down on 21 August 2024. Information from the Bank of Lithuania. Available online: <https://www.lb.lt/lt/naujienos/pokyciai-lietuvos-banko-valdyboje-1> [accessed 06/01/2025].

The only domain in the Gender Equality Index where the gap is recorded to the disadvantage of men in Lithuania is education. Lithuania is one of only four countries where the gender gap in higher education attainment is most pronounced³.

Looking at Lithuania’s progress on gender equality over the past decade, as measured by EIGE, one might summarise it as slow and inconsistent. Some domains show stagnation and/or deterioration (see Figure 1).

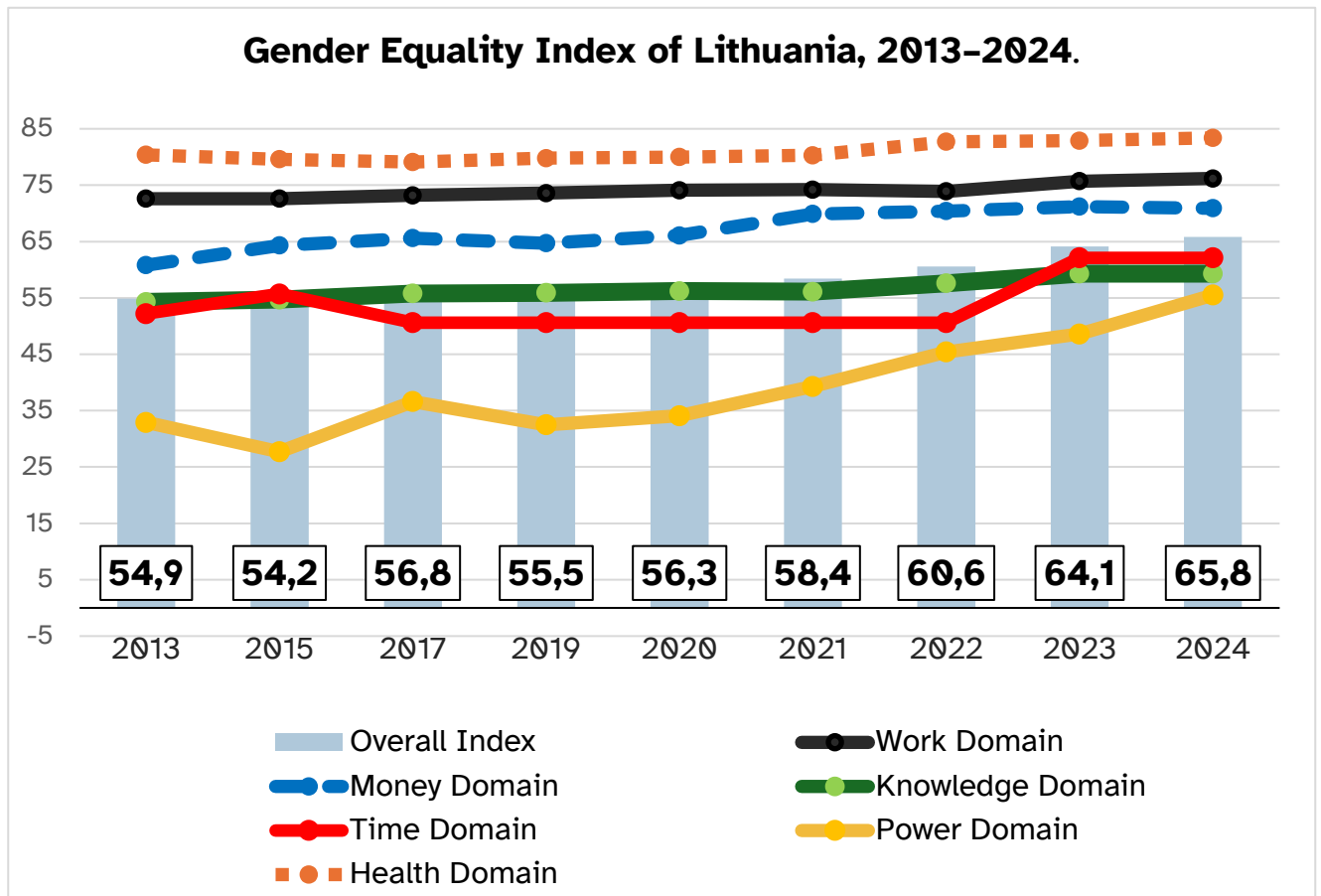


Figure 1. Gender Equality Index, 2013–2024

Public opinion surveys reveal that women and men in Lithuania perceive progress in gender equality differently. [A public opinion poll on gender inequality](#), initiated by the Office, shows that 67% of men and only 42% of women believe or tend to believe that men and women have equal rights in Lithuania.

Although Lithuania’s best result in the Gender Equality Index is in the domain of work, women and men in the country still earn different wages. According to 2024 data from Sodra (State Social Insurance Fund Board), the gender pay gap stood at 12.9%. The largest gaps are recorded in male-dominated sectors, such as finance and insurance (31.1%), information and communication (27.7%), or in areas where men hold most leadership roles, such as human health care and social work (32.8%).

³ According to the International Standard Classification of Education (ISCED), higher education refers to ISCED levels 5–8, which include bachelor’s, master’s, and doctoral degrees, as well as short-cycle tertiary education above upper secondary but below bachelor’s level.

As stated in [Sodra's published information](#), although women make up 86% of those employed in the health care and social work sector, they earn half as much as men.

The gender pay gap also varies by age. According to [Sodra](#) data, the gap is among the widest between the ages of 31 and 40. It can be assumed that this is linked to family formation – a life stage typically associated with starting a family, raising children, and career interruptions, which are more commonly experienced by women. According to the latest data from [EIGE](#), 65% of women in Lithuania spend time on household chores and cooking every day, compared to only 29% of men. Caring responsibilities for children, grandchildren, elderly relatives, or persons with disabilities are undertaken daily by 35% of women and 21% of men. [Sodra](#) also reports that 88% of parental leave takers in 2024 were women. Only 5,400 men used the non-transferable months of parental leave (in 2023, 20,623 babies were born in Lithuania; in 2024, 18,673 births were recorded, based on preliminary data).

When discussing gender equality, it is essential to examine **domestic violence** indicators. Statistical data show that gender is a significant factor – women are far more likely to experience domestic violence. According to the Information Technology and Communications Department, in 2024, 73.3% of victims of domestic violence were women,⁴ while the vast majority of alleged perpetrators were men (85.1%)⁵. It should be emphasised that only a small proportion of domestic violence cases reach pre-trial investigation institutions. The actual scale of domestic violence can be inferred from other data sources – such as the number of police reports, emergency barring orders issued, information on assistance provided, and sociological research.

In 2024, the police registered 54,602 reports related to domestic violence⁶, while specialised comprehensive assistance centres provided support 17,757 times in cases of domestic violence – 75% of all those receiving this assistance were women⁷).

Since 1 July 2023, with the entry into force of the revised Law on Protection Against Domestic Violence, a new violence prevention measure has been implemented – the emergency barring order against domestic violence. It is intended to protect a person at risk of domestic violence – after assessing the risk of violence, a police officer (male or female) may require the person posing the threat to temporarily move

⁴ Data on persons registered in pre-trial investigation institutions as victims of criminal offences related to domestic violence. Breakdown by gender: men and women. Information Technology and Communications Department, 2024.

⁵ Data on criminal offences related to domestic violence registered in pre-trial investigation institutions and on suspects (accused persons). Breakdown by gender: men and women. Information Technology and Communications Department, 2024.

⁶ Reports of domestic violence registered by the police, 2024. Official Statistics Portal, Indicators Database. <https://osp.stat.gov.lt/statistiniu-rodikliu-analize#/>

⁷ Victims of domestic violence who received specialised comprehensive assistance, 2023. Official Statistics Portal, Indicators Database. <https://osp.stat.gov.lt/statistiniu-rodikliu-analize#/>

out of the place of residence, not to visit, not to approach, not to communicate with, and not to attempt to make contact with the person at risk. According to [data from the Ministry of Social Security and Labour](#), from 1 July 2023 to 30 September 2024, more than 26,000 emergency barring orders against domestic violence were issued. The majority of persons at risk were women (78.5%), most of them older (aged 60 and above). Among men, those most at risk were also older men. Men accounted for the majority of persons posing a threat of violence (85.2%), most of them aged 30–49⁸.

In 2024, the European Union Agency for Fundamental Rights (FRA), together with Eurostat and EIGE, presented the results [of a survey on gender-based violence](#) conducted in EU countries. More than 114,000 women from 27 EU Member States participated in the study. During interviews, women shared their experiences related to violence, domestic violence, sexual assault, intimate partner violence, stalking, and sexual harassment in the workplace.

The findings revealed that in Lithuania, one in four women (24.2%) has experienced some form of violence from another person. One in three women (30.7%) reported having experienced physical, sexual and/or psychological violence by an intimate partner during their lifetime. One in five women (19.1%) said they had experienced sexual harassment in the workplace. A further 13.6% of women reported having experienced violence from someone other than an intimate partner. One in ten women (10%) in Lithuania reported experiencing sexual violence.

Public opinion surveys indicate that people in Lithuania tend to justify gender-based violence and blame the women who experience it. This tendency is reinforced by persistent gender stereotypes in the country. According to data from the [2024 Eurobarometer](#), 70% of Lithuanian respondents agree or tend to agree with the statement: “If a woman shares intimate photos with someone, she is at least partially responsible if the photo is shared without her consent.” More than half (51%) agree that “If women share their opinions on social media, they should expect to receive sexist, degrading and/or offensive comments.” Four in ten (43%) agree or tend to agree that “If a woman experiences sexual violence while under the influence of alcohol or drugs, she is at least partially responsible” (EU average – 16%). Three in ten (29%) believe that “Women often make up or exaggerate claims of violence or rape” (EU average – 17%).

The results of a representative 2024 [public opinion survey](#), commissioned by the Office, on attitudes towards women with disabilities showed that, although the vast majority of the population (90%) believe there is never any justification for a partner or spouse to use violence against a woman with a disability, 70% of respondents would justify financial control by a partner/spouse over a woman with an intellectual disability, and 51% would justify social control. Men were more likely than women to

⁸ Ibid.

justify violence against women with disabilities in all cases. They were also more likely to agree that women with disabilities provoke violence against themselves or exaggerate and dramatize when accusing men of violence. Women with intellectual and psychosocial disabilities were the most likely to be blamed for the violence they experienced. Another [public opinion survey](#) on gender inequality, initiated by the Office in 2024, revealed a significant difference in how men and women view responsibility for sexual harassment – men were far more likely to believe that women provoke it themselves. This opinion was held by 43% of men and 20% of women.

The [2024 Eurobarometer](#) also shows inconsistency in Lithuanian public attitudes toward gender stereotypes. On the one hand, the vast majority of respondents (82%) believe or tend to believe that men whistling at women, staring at them, or catcalling is unacceptable behaviour, and that suggestive remarks or offensive comments by male colleagues about a female colleague's appearance in the workplace are inappropriate (81%). On the other hand, half of the respondents (50%) stated that depicting women with sexual undertones in advertising is acceptable, or acceptable under certain circumstances.

Attitudes of the Lithuanian Population Towards Vulnerable Groups

In 2024, the Office commissioned a [representative public opinion](#) survey on the attitudes of Lithuanian residents towards immigrants. The survey asked about people who arrived from non-EU countries and currently reside legally in the EU. Half of the respondents believed that immigrants have a positive impact on Lithuania's economy. The data showed that 71% of respondents agree that immigrants help fill job vacancies that are difficult to fill in Lithuania. This figure has remained consistent over time – 71% of respondents expressed the same opinion in the [2017 Eurobarometer survey](#).

However, the survey results also revealed growing xenophobic attitudes: as many as 44% of respondents believe that immigrants take jobs away from workers in Lithuania. This proportion has increased – in 2017, 37% of respondents thought so. More than half (57%) consider immigrants to be a burden on Lithuania's social services system. 69% of respondents said they would feel comfortable receiving care from immigrant doctors, but significantly fewer people would view an immigrant positively as their direct manager (48%).

A full 91% of respondents stated that immigrants who have received a residence permit in Lithuania must learn the official state language.

The survey also asked how willing Lithuanian residents would be to rent housing to people of different identities. Only 9% of respondents said they would rent to a person of Roma ethnicity. Fewer than one in four would rent to a Russian (21%) or a Muslim (22%), around one third would rent to a Black person (29%) or to a tenant who does

not speak Lithuanian (34%). The results indicate support for people from Ukraine – they would be the most accepted group, with 46% of respondents willing to rent housing to them. This figure is higher than the proportion who would rent to a family with young children (40%).

A 2024 public opinion survey commissioned by the Office on [understanding of human rights in Lithuania showed](#) that 6 in 10 people would know where to turn in the event of a human rights violation. More than half of respondents believe that discrimination is most widespread in the labour market (60%). One third of respondents (34%) identified the healthcare sector, and one quarter (24%) the housing rental sector, as problematic areas.

Rights of LGBTI+ People

Progress in securing the rights of LGBTI+ people in Europe and the Middle East region is measured annually through the [Rainbow Europe Map](#). The map assesses the legal and social standing of LGBTI+ individuals across 49 countries.

In 2024, Lithuania moved up from 36th to 35th place, scoring 28% (a score of 100% would indicate full equality for LGBTI+ individuals with other citizens in all areas measured by the index). This is the first rise in Lithuania's score in five years. The reason for the improved ranking was the points awarded by the index's compilers in response to methodological guidelines for the pre-trial investigation of hate crimes and hate speech, approved in 2023 by the Prosecutor General of Lithuania. These guidelines explicitly define sexual orientation, gender identity and gender expression as identity characteristics protected from hate crimes.

Malta continues to hold first place in the index with a score of 88%, while Poland remains in last place among EU Member States with 17.5%.

recognition for refugees (Lithuania received no points on this). The second identifies countries where legal gender recognition is not banned. According to the index authors, this criterion was introduced in response to deliberate moves by some states to prohibit legal gender recognition – such policies have already been adopted by Russia, Bulgaria, and Hungary.

The criteria Lithuania meets relate to legal gender recognition: there is an administrative procedure for changing one's personal name; individuals are permitted to change their first name; no surgical intervention is required prior to changing documents; and mandatory sterilization is not required to change the gender marker in official documents. Among EU Member States, only Latvia (4 points) and Romania (2 points) received lower scores than Lithuania. The top performers were Iceland (30 points) and Malta (27.5 points).

In 2024, the Office commissioned a representative public opinion [survey](#) on attitudes towards transgender people. A similar survey was conducted in 2018, making it possible to assess how public opinion has changed over the six-year period. The results showed an increase in perceived awareness of what it means to be transgender: in 2018, 48% of respondents said they knew the term; in 2024, this rose to 60%. Lithuanians most often learned about transgender people via online information (53%) and media coverage (47%). The popularity of online information as a source has grown substantially – in 2018, only 18% of respondents cited it.

The majority of respondents would react positively or neutrally to having a transgender colleague (68%) or neighbour (67%). However, this share decreased when asked about a transgender person holding a senior public position (51%) or working at a school attended by their children (51%). More than one-third of participants said they would feel uncomfortable or very uncomfortable if a transgender person held a senior position in Lithuania (35%) or worked at their child's school (36%). 23% of respondents would not agree to rent housing to a transgender tenant. Upon learning about their child's transgender identity, 25% of survey participants would express support, compared to 20% in 2018.

Ensuring Equal Opportunities for Persons with Disabilities

In a 2024 representative [survey](#) commissioned by the Office, respondents were asked which societal groups in Lithuania they believe face the highest levels of discrimination. The majority – 39% – indicated persons with psychosocial or intellectual disabilities. A slightly smaller proportion – 36% – identified people with physical disabilities.

According to a representative [survey](#) published by Bitė Lietuva, 7 in 10 people in Lithuania believe that over the past two decades, the opportunities for persons with disabilities to integrate into society and the labour market have improved. Nearly

two-thirds (65%) of respondents believe that during this period, tolerance towards people with disabilities has increased and discrimination has decreased.

Nevertheless, the reality for people with disabilities still shows a lack of progress. [Approximately 150,000 persons of working age with disabilities live in Lithuania](#), but according to data from [Sodra](#), only 30.4% of them are employed. [The EU average is significantly higher](#) – according to 2024 data, 51% of working-age persons with disabilities in the EU are in employment.

Public attitudes towards employees with disabilities in Lithuania are also not particularly positive. Only 37% of respondents would be willing to work with persons who have intellectual or psychosocial disabilities. 16% believe that persons with intellectual disabilities would be unable to perform their assigned duties and that others would have to work on their behalf. Another 16% stated that they would feel uncomfortable working alongside colleagues with psychosocial disabilities, while 13% said such colleagues would disrupt the work of the team or even pose a danger.

Nearly twice as many respondents are more tolerant of colleagues with physical disabilities – 68% said they would be willing to work with them. Only one in six (17%) believes that persons with disabilities have equal opportunities to compete in the labour market.

Ensuring Equal Opportunities for Older People

According to [data](#) from the Ministry of Social Security and Labour, persons aged 65 and over make up approximately 20% of the total population of Lithuania. About 11% of people in this age group have a disability. According to the State Data Agency, the poverty risk rate is highest in the 65+ age group – in 2023 it stood at 39.5% (the overall poverty risk rate was 21.3%). Older women (aged 65 and over) are more likely to face poverty risk than men: the poverty risk rate for women is 43%, compared to 23% for men.

In view of these figures and a 2023 [study](#) by the European Union Agency for Fundamental Rights on the challenges faced by older persons in the context of accelerated digitalisation, the Office conducted a study in 2024 to identify the digital challenges faced by older people in Lithuania. The aim of the study was to highlight the experiences of older persons and the barriers they face in terms of digital exclusion when accessing services or purchasing goods. Given that more than 120,000 people⁹ still receive their old-age pensions in cash at home, one focus of the study was the use of cash to pay for goods and services.

⁹ Data as of August 2024. The data were provided at the request of the Office of the Equal Opportunities Ombudsperson and are not publicly available.

The study, which combined qualitative and quantitative methods, revealed the layered nature of digital exclusion – not all instances have the same impact or cause the same difficulties in daily life. The effects of digital exclusion are greatest when essential services (those without which many older persons cannot function – healthcare, transport, access to food and goods, etc.) are moved to digital platforms. These effects are also felt when previous access points at service or retail locations are removed, with no alternative or realistic way of obtaining those services.

The study also showed that the highest risk of digital exclusion is faced by the oldest persons (aged 75 and over), residents of rural areas, and older women. The study overview not only identifies key problem areas but also provides recommendations to policymakers and service providers on how to reduce the risk of digital exclusion (for more on the study, see section 4.2).

General Statistics for 2024

In 2024, the Office of the Equal Opportunities Ombudsman received 261 official complaints, 795 written enquiries, and 70 enquiries via the social media platform Facebook. Consultations on equal opportunities were provided by telephone 648 times, and in person at the Office’s premises on 19 occasions (see Figure 2).

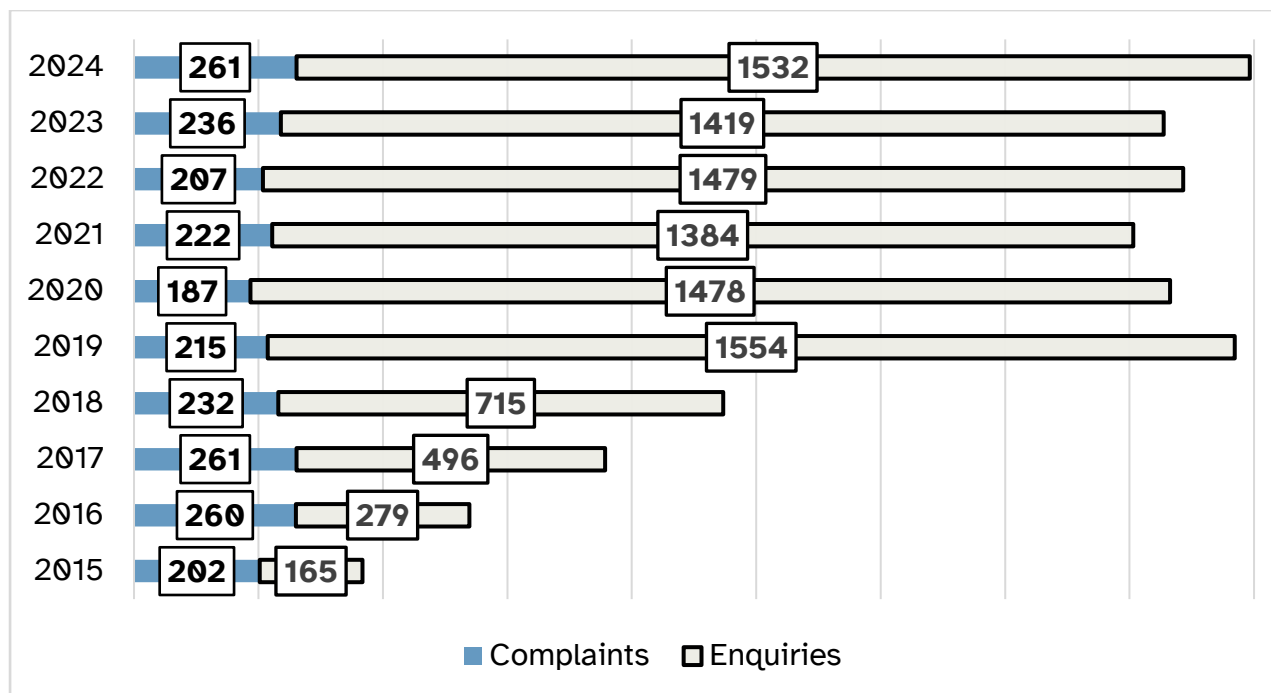


Figure 2¹⁰. Enquiry dynamics since 2015.

In 2024, the number of people contacting the Office increased – there was a rise in both official complaints and general enquiries. The category “enquiries” includes both complaints and other forms of contact. These terms are defined in the Office’s working practice as follows:

Complaint – a submission in writing (or via a recording in Lithuanian Sign Language) made by a natural person, legal entity or anonymous individual, requesting an investigation into a potentially experienced or observed instance of discrimination. A complaint includes details of the circumstances, supporting evidence, and identifies the subject whose actions are being challenged and whose conduct is requested to be reviewed.

Enquiry – a submission made in writing (by email, Facebook message, or the online enquiry form) or verbally (by phone, or during an in-person or remote consultation) by a natural person, legal entity or anonymous individual, requesting an assessment of a

¹⁰ Enquiries have been recorded separately from complaints since 2015. Statistics on Facebook enquiries have been collected since 2016. Since 2019, telephone consultations have also been included in enquiry statistics. These circumstances explain the sharp change in enquiry dynamics when comparing the periods 2015–2018 and 2019–2024.

particular situation. The term “enquiry” also refers to requests for information, advice, or consultations on various matters related to the assurance of equal opportunities or the prevention of discrimination. Persons making enquiries do not request that an investigation or other administrative procedure be initiated.

As in 2023, most enquiries and consultations last year concerned the non-assurance of equal opportunities on the grounds of gender ¹¹(536 instances), disability (385 instances) and age (383 instances) (see Figure 3¹²). The number of enquiries on the grounds of gender and age increased slightly (in 2023, there were 530 and 351 instances respectively), while enquiries on the grounds of disability decreased slightly (406 in 2023). As in previous years, the fewest enquiries were submitted on the grounds of race, ethnic origin, religion, or belief. In 192 instances, individuals contacted the Office regarding more than one grounds listed in the Law on Equal Treatment simultaneously. In 462 cases, enquiries were submitted on matters falling outside the competence of the Office of the Equal Opportunities Ombudsperson.

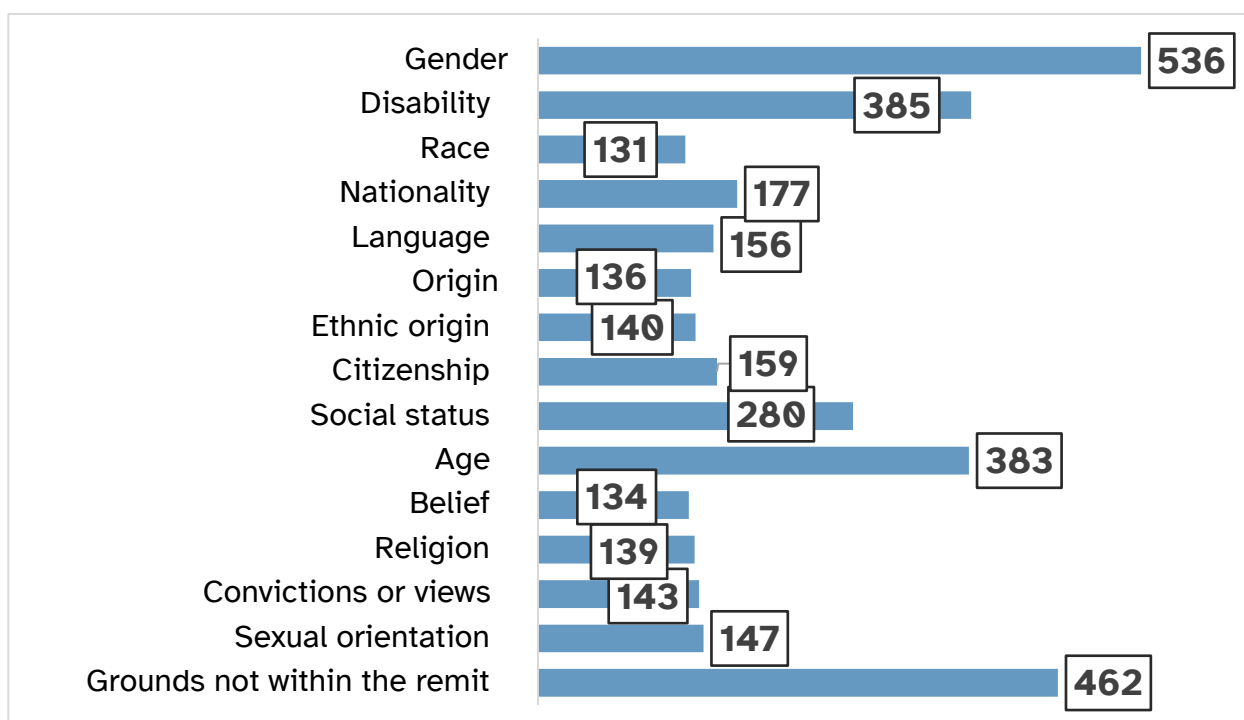


Figure 3. Enquiries by grounds of personal identity¹³.

¹¹ Inquiries related to gender also include residents’ questions concerning gender identity or gender expression. In the area of discrimination prevention and equal opportunities mainstreaming, there were 9 inquiries regarding gender identity.

¹² The number of enquiries does not correspond to the total number of contacts, as a person may submit a single enquiry concerning potential discrimination on more than one grounds (for example, gender and age, or gender and social status, etc.). In 2024, enquiries concerning the assurance of equal opportunities on all grounds listed in the Law on Equal Treatment were counted under each individual grounds. For this reason, compared to the 2022 report and earlier ones, the overall enquiry figures are considerably higher.

¹³ In cases of multiple discrimination, individuals are discriminated against on the basis of more than one personal identity ground – for example, age and gender, age and marital status, and so on.

The Law on Equal Treatment and the Law on Equal Opportunities for Women and Men prohibit discrimination in five areas of public life:

- the activities of state and municipal institutions and agencies;
- the activities of educational establishments, other providers of education, and research and study institutions;
- employment relations and the field of occupation;
- the sale and provision of goods and services (in the area of consumer rights protection);
- the activities of organisations and associations based on professional affiliation.

The Office of the Equal Opportunities Ombudsperson is also actively engaged in the fields of discrimination prevention and mainstreaming of equal opportunities. Below is a statistical breakdown of the enquiries submitted by natural and legal persons by field of the Office’s activity, as well as media enquiries¹⁴ (see Figure 4).

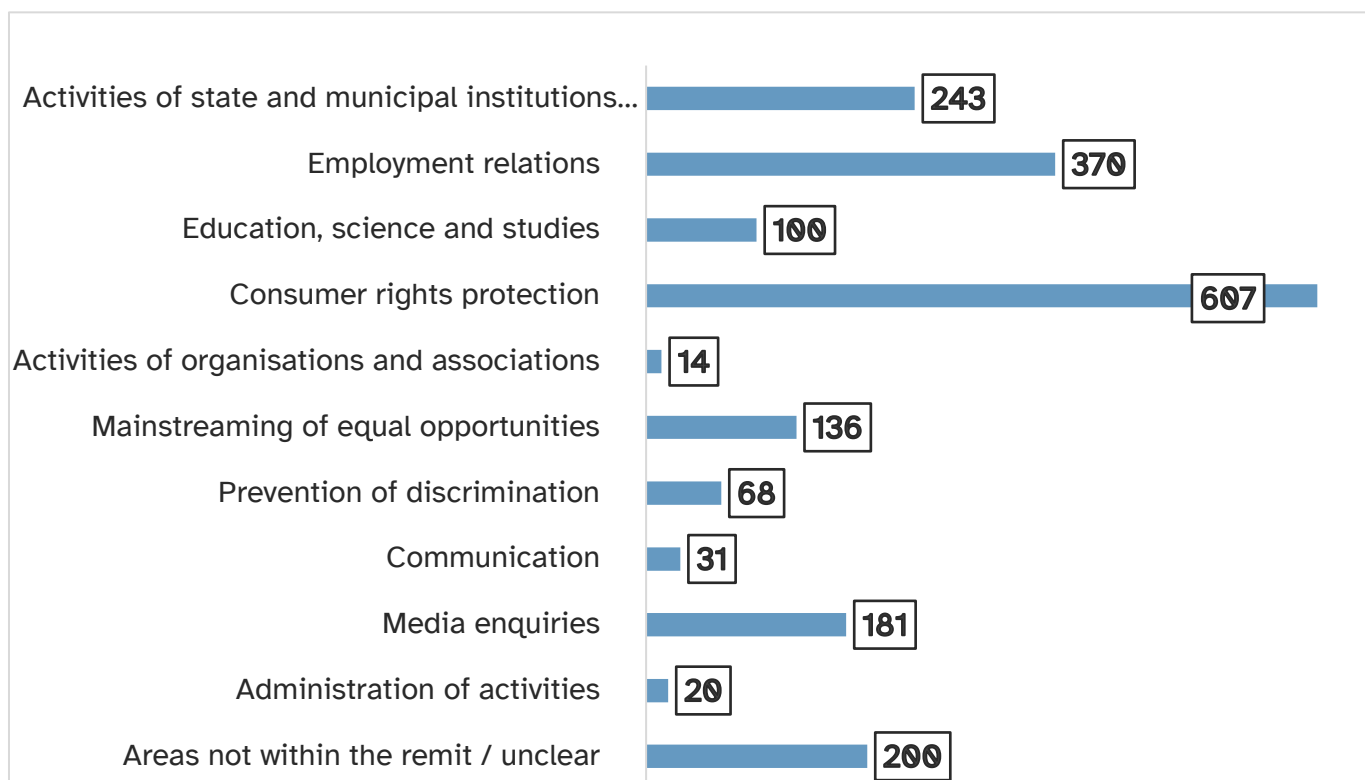


Figure 4. Number of enquiries by field of activity ¹⁵.

In 2024, legal persons contacted the Office 591 times. Organisations from the public and private sectors submitted 25 requests for training or capacity building in the field of ensuring equal opportunities for their employees.

¹⁴ Media enquiries are not included in the overall number of enquiries.

¹⁵ The data should be interpreted in a holistic manner. The fields to which enquiries relate are sometimes interlinked. For instance, enquiries in the field of employment relations may also partially reflect the Office’s work in the area of mainstreaming of equal opportunities.

Indicators of the Strategic Plan

Each year, the Office prepares a strategic activity plan and monitors the extent to which the set objectives are being achieved and the planned measures implemented. The table presents the activities planned and carried out in 2024.

Strategic Objectives, Measures, Monitoring Indicators and Units of Measurement	Indicator values monitored	
	Planned	Implemented
Collect and analyse inequality data		
Number of meetings with organisations and communities representing vulnerable societal groups per year	3	4
Number of studies or representative surveys of the Lithuanian population on equal opportunities	3	3
Number of independent reviews (initiated or conducted) per year	2	3
Raise public awareness on equal opportunities and human rights; conduct educational activities in the field of discrimination prevention		
Number of public awareness campaigns on equal opportunities	4	4
Number of event participants	200	406
Enhance the capacity of public and private sector actors in the field of mainstreaming of equal opportunities		
Number of public and private sector entities where the Equal Opportunities Ruler was carried out	15	15
Number of individuals who participated in equal opportunities training	350	360
Number of individuals who participated in online training on equal opportunities	100	3581
Number of employers or their representatives who participated in training on ensuring working conditions for persons with disabilities	50	65
Number of ministries participating in in-person and remote training on integrating gender equality and equal opportunities principles into policy-making	2	1

Number of municipalities whose representatives participated in in-person and remote training on integrating gender equality and equal opportunities principles into strategic documents	5	7
Number of education policymakers, general education professionals, teaching material developers and assessors who participated in training on mainstreaming of equal opportunities	75	195
Ensure that individuals who experience discrimination, harassment or sexual harassment can seek justice		
Total number of consultations provided on discrimination, harassment or sexual harassment: electronically, by phone, in person	1200	1299
Maintain a sufficiently high percentage of complaints within the Office's remit	60%	51%
Percentage of decisions implemented in less than three months	50%	63%
Number of ex officio investigations launched that year	10	10
Percentage of conclusions issued, depending on the Office's involvement in the process	90%	100%
Number of investigations conducted on the grounds of disability	20	25
Strengthen the implementation of equal opportunities at national and local levels by actively submitting proposals for legislation and policy measures		
Number of proposals submitted on legislation and/or policy or strategic documents (progress measures, equal opportunities plan, etc.) addressing gender equality and equal opportunities	20	48
Number of assessments of recommendations submitted by the Office to the State, and implementation of conclusions submitted to international mechanisms and/or organisations	1	2
Number of meetings attended with international and national institutions on the risks posed to equal opportunities by artificial intelligence, digitalisation, and climate change	3	5
Number of comments submitted on legislation related to risks to equal opportunities caused by artificial intelligence	1	1
Develop and maintain international cooperation in the field of equal opportunities and human rights		
Number of participations in EQUINET network working groups and events	14	14

Number of joint initiatives with equality bodies or other organisations from abroad on equal opportunities or discrimination prevention; number of jointly implemented projects or exchanges of good practice (visits)	1	3
Inform the public about the equal opportunities situation, protection of individuals and measures to ensure equal opportunities		
Number of articles and media releases on equal opportunities	100	105
Number of mentions of the Office in the media	600	1342
Ensure the effective operation of the Office		
Annual monitoring of the depreciation of computers and other assets	1	1
Annual preparation of the Office's public procurement plan	1	1
Implementation of a call forwarding system	1	0
Annual submission to the Seimas by the Equal Opportunities Ombudsperson of the independent report on the previous calendar year by 15 March at the latest, including the activity report, situation overview, conclusions and recommendations, and publication of the report on the Office's website	1	1
Timely submission and publication of annual and quarterly financial reports on the Office's website	4	4
Annual publication of the public procurement report	1	1
Organisation of annual strategic planning sessions in response to developments in society	1	1
Number of strategic plan implementation monitoring meetings per year	2	2
Review and, if necessary, update of the risk management plan at least twice per year	2	1
Number of website sections translated into Lithuanian Sign Language	5	5
Number of Office information texts translated into Easy-to-Read language	4	5

Translation of the main website content into English, Polish and Russian	3	10
Number of representative surveys of the Lithuanian population on awareness of the Office	1	1
Maintain awareness of the Office among no less than ¾ of the public (percentage)	75%	81%
Measurement of recognition of discrimination	1	1
Annual review of the equal opportunities policy implementation plan, including a list of benefits to support employees' work-life balance	1	1
Supervision or support sessions for teams or smaller groups	6	6
Number of academic hours of professional development training per employee per year	12	22.5

Investigations and Complaints Concerning Possible Discrimination

2.1. Overall Statistics on Investigations and Complaints

An investigation into possible discrimination may be launched by the Equal Opportunities Ombudsperson in two cases: upon receiving a complaint from an individual, or on the Ombudsperson’s own initiative. When a complaint is received by the Office, the information provided is assessed to establish the circumstances and to determine whether an investigation should be initiated. If the circumstances are unclear, the person submitting the complaint is asked to clarify or supplement the information.

In 2024, 261 complaints concerning possible discrimination were received. The highest number of complaints concerned consumer rights protection (121 complaints), while the fewest were received in the field of education, research and studies (21 complaints). No complaints were received regarding the activities of organisations and associations. On 22 occasions, official complaints were submitted on matters falling outside the remit of the Equal Opportunities Ombudsperson (see Figure 5).

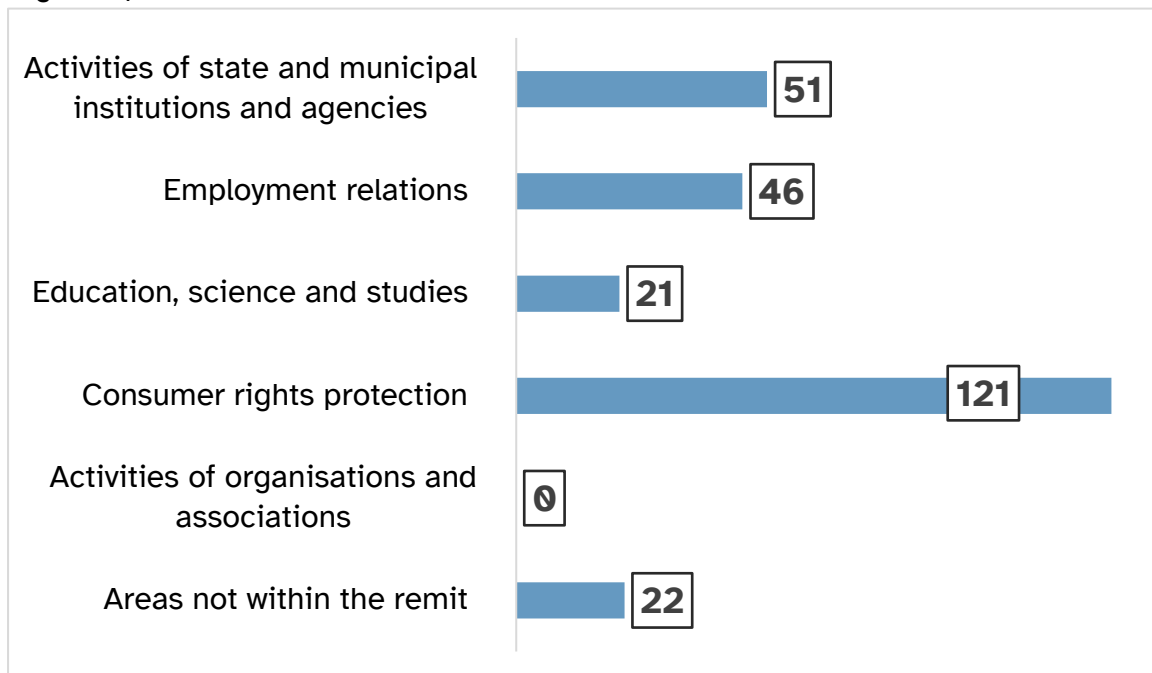


Figure 5. Distribution of complaints by field.

Most complaints were submitted concerning possible discrimination on the grounds of disability (60 complaints), while the fewest were received on the grounds of ethnic origin (2 complaints), and race, origin, religion and sexual orientation (3 complaints each). In 2024, no complaints were received concerning possible discrimination on the grounds of belief. A total of 49 complaints related to grounds outside the

competence of the Equal Opportunities Ombudsperson (see Figure 6). In 23 instances, complaints were submitted regarding possible multiple discrimination – where discrimination occurred on the basis of more than one personal identity characteristic simultaneously.

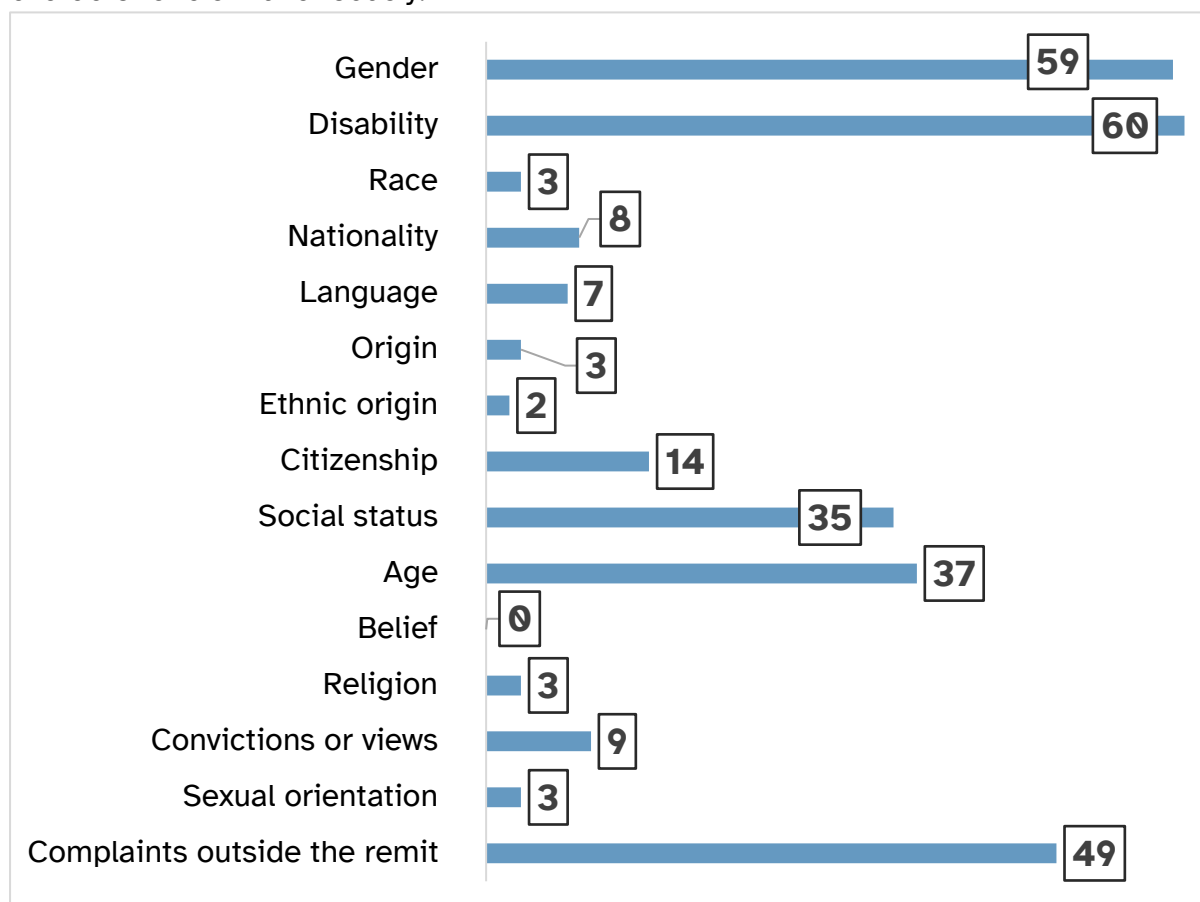


Figure 6. Distribution of complaints by grounds¹⁶.

A breakdown of complaints by the gender of the complainants is provided below. 16 complaints were submitted by legal persons¹⁷, and 73 individuals did not indicate their gender when submitting a complaint (see Figure 7).

¹⁶ The number of complaints does not correspond to the total number of complaints, as a person may submit a single complaint concerning possible discrimination on more than one grounds (for example, gender and age, or gender and social status, etc.).

¹⁷ Complaints submitted by groups of individuals are also counted under legal persons.

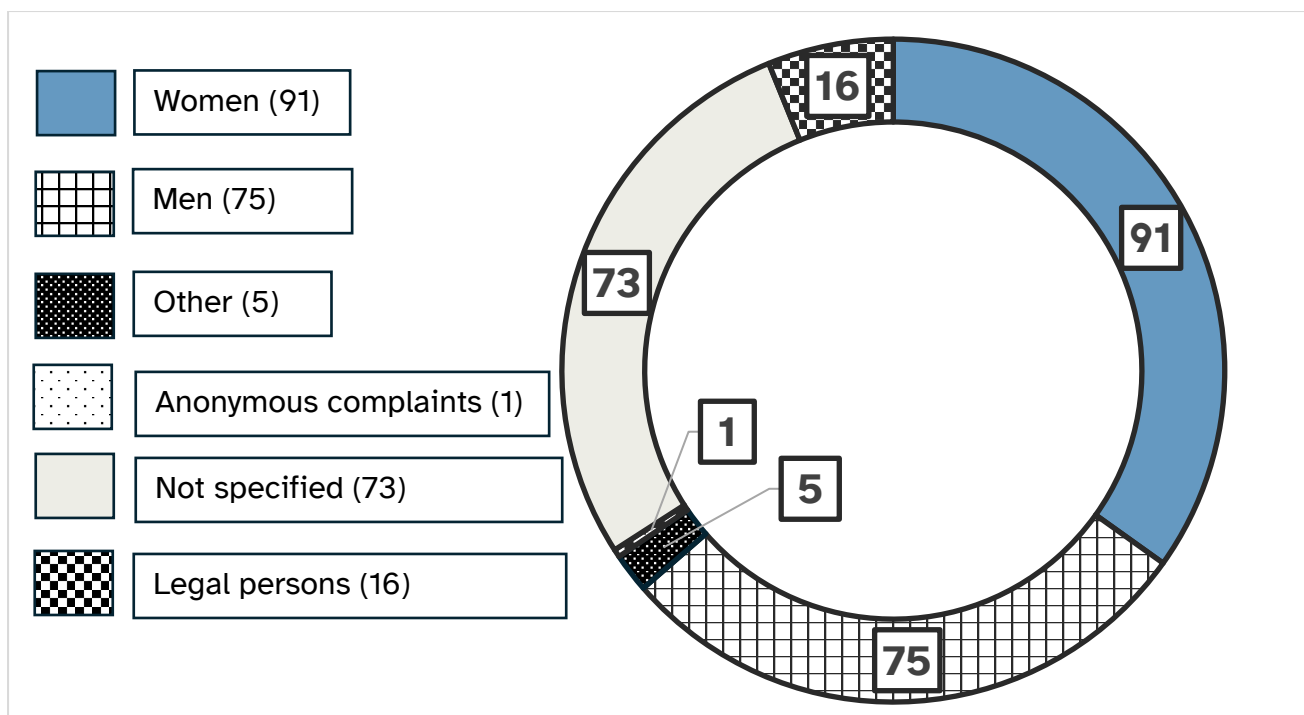


Figure 7. Distribution of complaints by the gender of the complainants.

In 2024, a total of 99 investigations were conducted. Based on received complaints, 89 investigations were initiated. Two investigations were launched by the Children’s Rights Ombudsperson Edita Žiobienė, acting as substitute for the Equal Opportunities Ombudsperson, and a further eight investigations were launched on the initiative of Seimas Ombudsperson Jolita Miliuvienė, also acting as substitute for the Equal Opportunities Ombudsperson. Thirty-six complaints were forwarded to other institutions.¹⁸

Children’s Rights Ombudsperson Edita Žiobienė and Seimas Ombudsperson Jolita Miliuvienė, acting as substitutes for Equal Opportunities Ombudsperson Birutė Sabatauskaitė, jointly adopted 90 decisions (more than one decision and type of decision may be adopted per investigation). In 35 instances, a violation of equal treatment was established (13 of these based on investigations launched in 2023)¹⁹. Decision statistics are presented in Figure 8.

¹⁸ Complaints are usually forwarded to other institutions without a separate decision being adopted (they are treated in accordance with Article 27 of the Law on Equal Treatment – “Refusal to examine a complaint”. Decisions are adopted pursuant to Article 29 – “Decisions of the Equal Opportunities Ombudsperson”. Among the possible decisions available to the Ombudsperson is the referral of a complaint to another institution).

¹⁹ It should be noted that decisions on certain complaints were adopted only in 2025, and are therefore not included here.

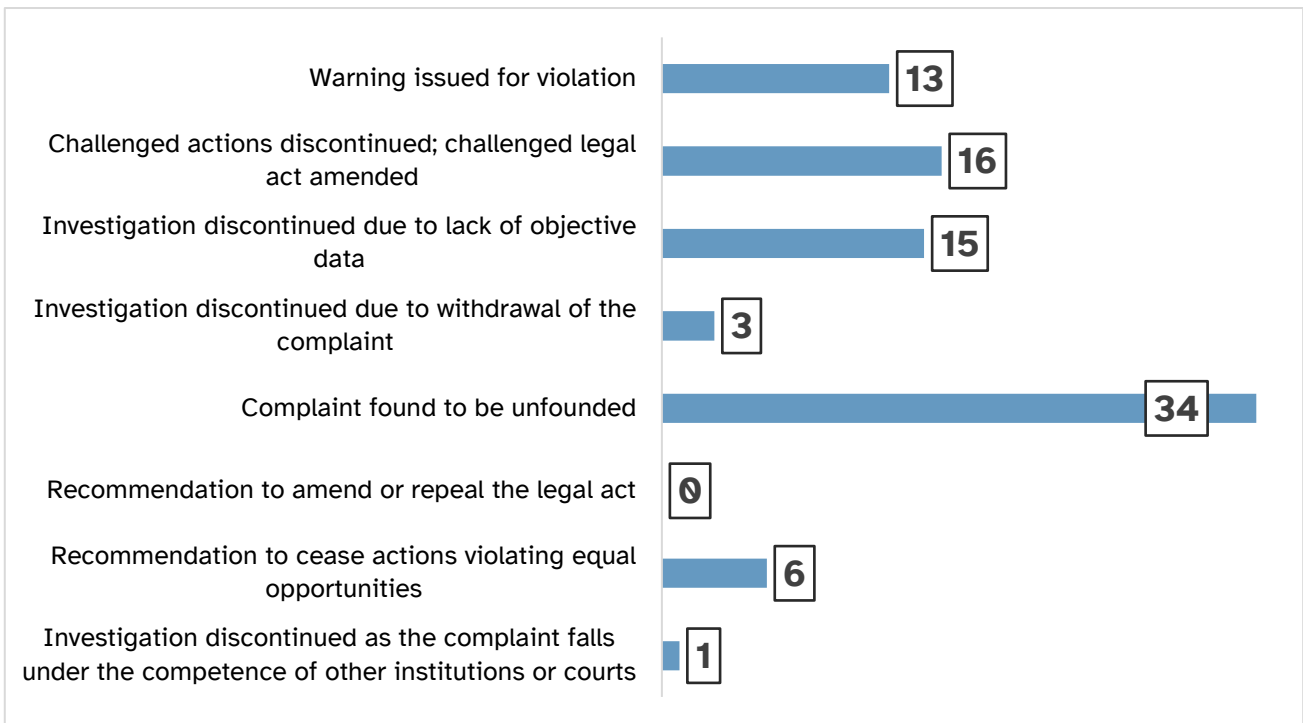


Figure 8. Statistics on decisions adopted by the Ombudsperson.

The highest number of violations was established on the grounds of disability (15 instances) and gender (13 instances), most frequently in the field of consumer rights protection (22 violations). The distribution of violations by field is presented in Figure 9.

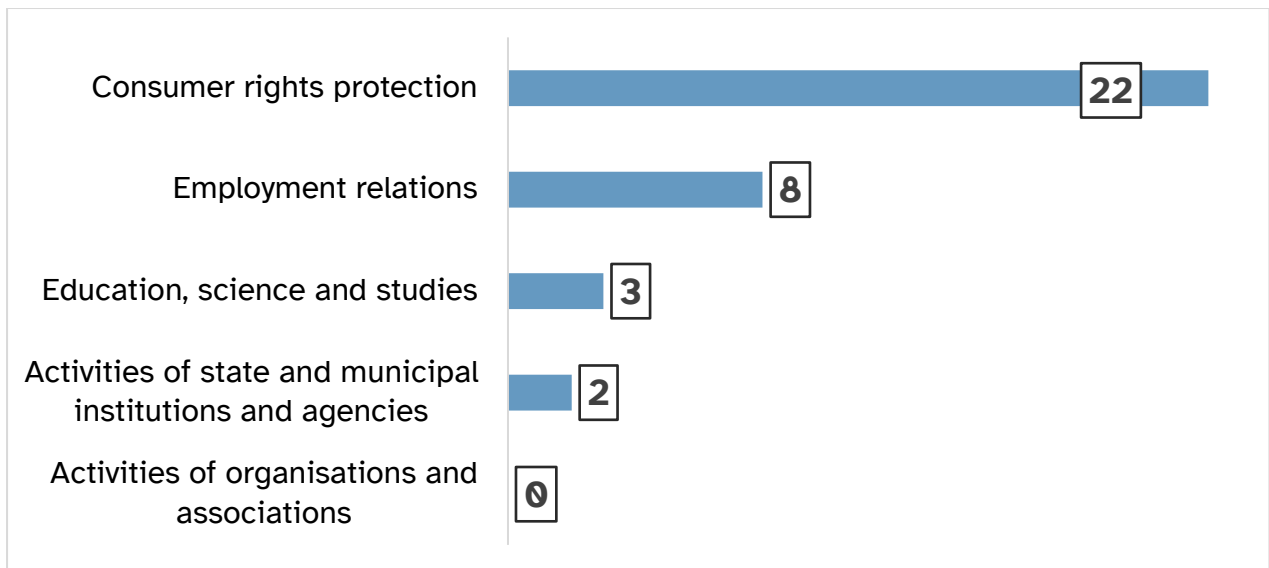


Figure 9. Distribution of violations by fields.

2.2. Possible Discrimination on the Grounds of Gender

In 2024, the Office received 59 complaints concerning possible discrimination on the grounds of gender and conducted 30 investigations. Individuals sought consultations on discrimination 152 times by phone, twice in person at the Office, and 282 times in writing. The number of complaints received, and investigations launched at the Ombudsperson's initiative has remained relatively stable in recent

years (see Figure 10).

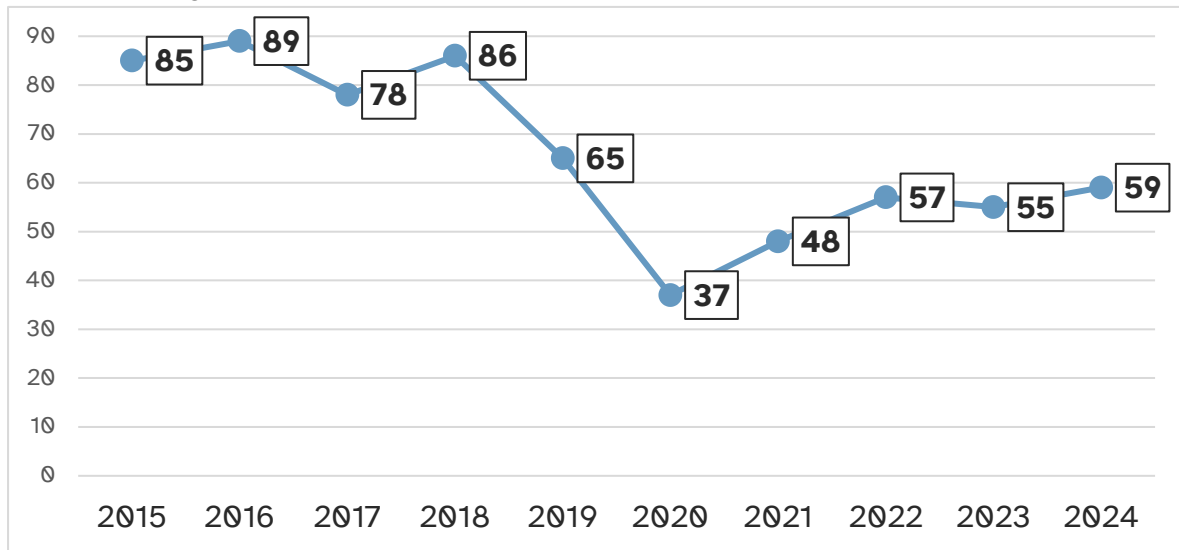


Figure 10. Dynamics of complaints and investigations launched at the Ombudsperson's initiative since 2015

The highest number of complaints concerned consumer rights protection (23 complaints). On six occasions, complaints were submitted on matters falling outside the remit of the Equal Opportunities Ombudsperson (see Figure 11). In 2024, no complaints were received regarding the activities of organisations and associations.

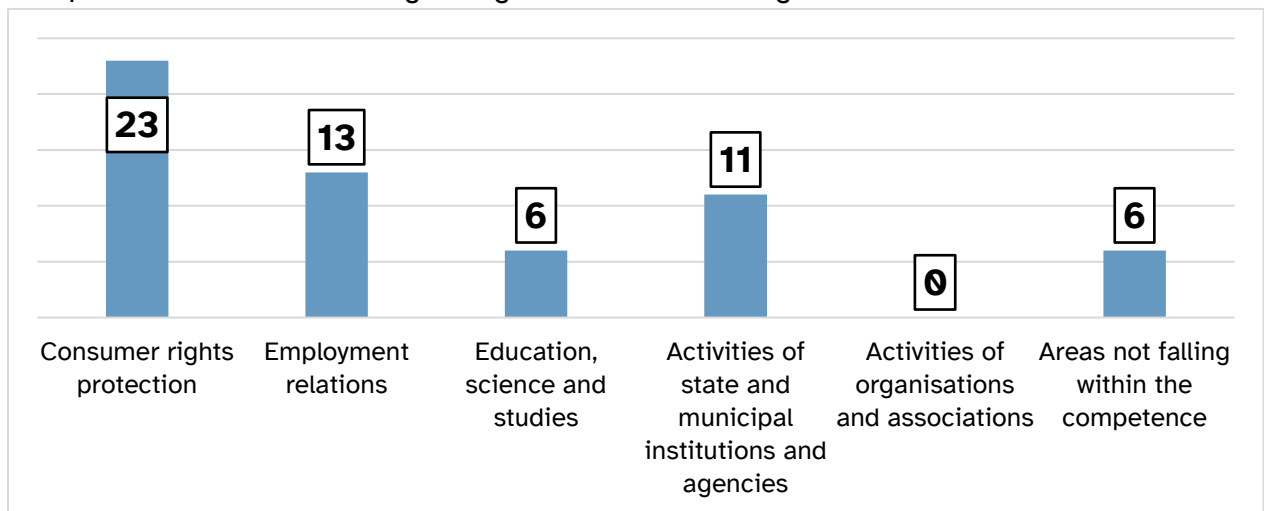


Figure 11. Distribution of complaints by field

Following investigations into possible discrimination on the grounds of gender, discrimination was established on 13 occasions: six in the field of employment relations, five in consumer rights protection, and two in the field of education, research and studies.

Relevant examples

Example 1

In autumn 2023, a complaint was received concerning a female doctor at the National Cancer Institute who was allegedly subjected to discriminatory treatment at work, being placed in a less favourable position than her male colleagues. She was only allowed to perform operations in the afternoons, whereas a male colleague in the same department was permitted to work mornings as well.

In the course of the investigation, the Office analysed the work schedules, competencies and experience of the surgeons in the department, reviewed meeting minutes and other internal legal acts, and established a violation of equal treatment.

It was [found](#) that the doctor who submitted the complaint had been discriminated against on the grounds of gender. The investigation also revealed that the administration of the National Cancer Institute had repeatedly urged the head of the department to ensure a non-discriminatory work schedule for the complainant.

However, the department head either ignored these instructions or only partially followed them. As a result, the management of the Institute imposed a disciplinary sanction – a warning – on the department head.

Example 2

In April 2024, the Office received an anonymous complaint regarding a lecture titled “Implementation of the Life Skills Curriculum in Basic Education” delivered at the Faculty of Catholic Theology of Vytautas Magnus University (VMU). The complaint stated that the lecture content contradicted scientific research and that the lecturer expressed sexist and misogynistic views towards women. It was also alleged that the lecture materials reinforced harmful stereotypes and contributed to a culture of victim-blaming in cases of sexual violence.

Following an investigation, Seimas Ombudsperson Jolita Miliuvienė, acting as substitute for the Equal Opportunities Ombudsperson, [found](#) that the university had failed to adequately ensure that its educational programmes, textbooks and learning materials did not contain discrimination or promote discriminatory content on the grounds of gender. The Ombudsperson recommended that VMU revise the lecture material to ensure it does not portray or encourage degrading views of women and men, and does not perpetuate assumptions that promote inequality among the genders.

Example 3

In October 2023, a female employee of “Sūduvos vandenys” UAB submitted a complaint concerning being paid less than her male colleagues who held the same position. The woman, employed as the Head of the Customer Service Department, informed the Office that at the end of 2022, following the appointment of a new director, her salary was increased by €50, whereas the salaries of other department heads – the majority of whom were men – were raised by three times that amount. Following an investigation, Children’s Rights Ombudsperson Edita Žiobienė, acting as substitute for the Equal Opportunities Ombudsperson, [concluded](#) that the woman had been discriminated against on the grounds of gender.

As in previous years, in 2024 the Office received a number of complaints concerning sexist, demeaning or objectifying advertisements targeting women, as well as advertisements containing gender stereotypes. Over the course of the year, 8 complaints were submitted on this topic, alongside 19 written enquiries and 19 phone consultations. Some advertisements were discontinued or removed either after an investigation into possible discrimination was launched or during the course of the investigation. In most cases, investigations into potentially discriminatory advertisements are not initiated, as the Office engages in communication with the advertisers, reminding them of the duty set out in the equal opportunities legislation to ensure that advertisements and other information about goods and services do not degrade, demean, restrict rights or confer privileges based on a person's gender. It is important to note that the Equal Opportunities Ombudsperson does not assess advertisements that do not contain features of discrimination. If advertisements portray unethical behaviour or violate moral or ethical standards, the information is passed on to the Inspector of Journalist Ethics or to a self-regulatory advertising body to be assessed within their respective competences.

The key trends in complaints that emerged in 2024:

- Most complaints and official submissions concerned potential violations in the field of consumer rights protection. A new trend is also becoming evident, with both women and men submitting complaints about harassment in the provision of services. Unfortunately, such cases are difficult to prove, as complainants often fail to provide evidence or do not have any. In such cases, the investigation must be discontinued due to lack of evidence.
- There is an increasing number of enquiries about sexual harassment and harassment on the grounds of gender in the healthcare sector. It should be noted that in such cases, individuals should first contact the healthcare institution in order to have the actions of medical staff assessed.

Continuing trends observed in previous years:

- Some investigations cannot be carried out due to a lack of evidence, especially in cases of harassment and sexual harassment. The situation is often further complicated by delayed reporting by complainants (i.e. when the complaint is lodged long after the incident occurred).
- The Office continues to receive complaints concerning sexist advertisements, advertisements promoting gender stereotypes, and potentially discriminatory content against women. A growing number of advertisers now recognise that sexist advertisements are incompatible with the Law on Equal Opportunities for Women and Men and stop publishing such advertisements during the course of the investigation.

- ☑ A number of complaints on discrimination based on gender in employment relations are submitted after the employment relationship has already ended, or when the employee knows or suspects that they are about to be dismissed. This trend suggests that, although employees are legally protected against victimisation for lodging a complaint or providing testimony, this provision may be ineffective or there is fear that it will not be enforced.
- ☑ Parents contact the Office regarding school uniform policies requiring girls to wear skirts or pinafores, without offering the option to wear trousers.
- ☑ The Office continues to receive complaints about job advertisements specifying a preferred gender of the candidate.

2.3. Possible Discrimination on the Grounds of Disability

In 2024, the highest number of complaints – 60 in total – concerned possible discrimination on the grounds of disability, with an additional seven investigations launched at the Ombudsperson’s initiative. Individuals sought consultations on discrimination 100 times by phone or in person and submitted a further 190 enquiries in writing.

The number of complaints received, and investigations launched at the Ombudsperson’s initiative on this grounds has been steadily increasing for several consecutive years, and in 2024 it reached the highest level in the past decade (see Figure 12).

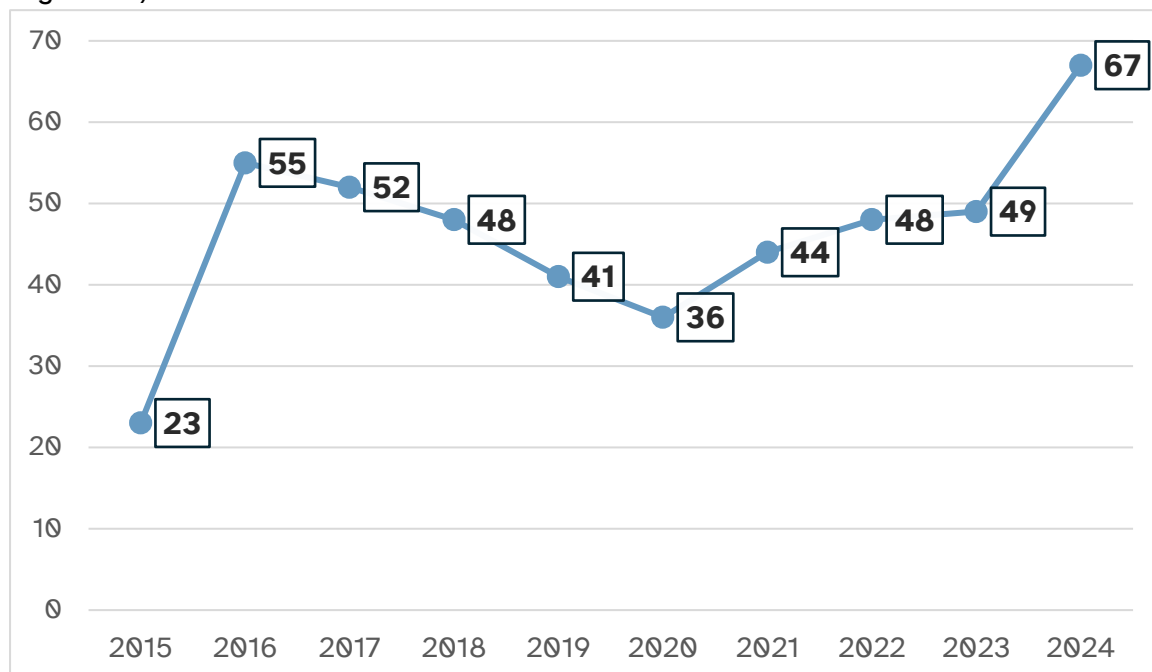


Figure 12. Dynamics of complaints and investigations launched at the Ombudsperson’s initiative since 2015

As in previous years, most investigations concerned possible discrimination in the field of consumer rights protection, while the fewest were in the field of education, research and studies (see Figure 13). In 2024, no investigations were carried out concerning the activities of organisations and associations.

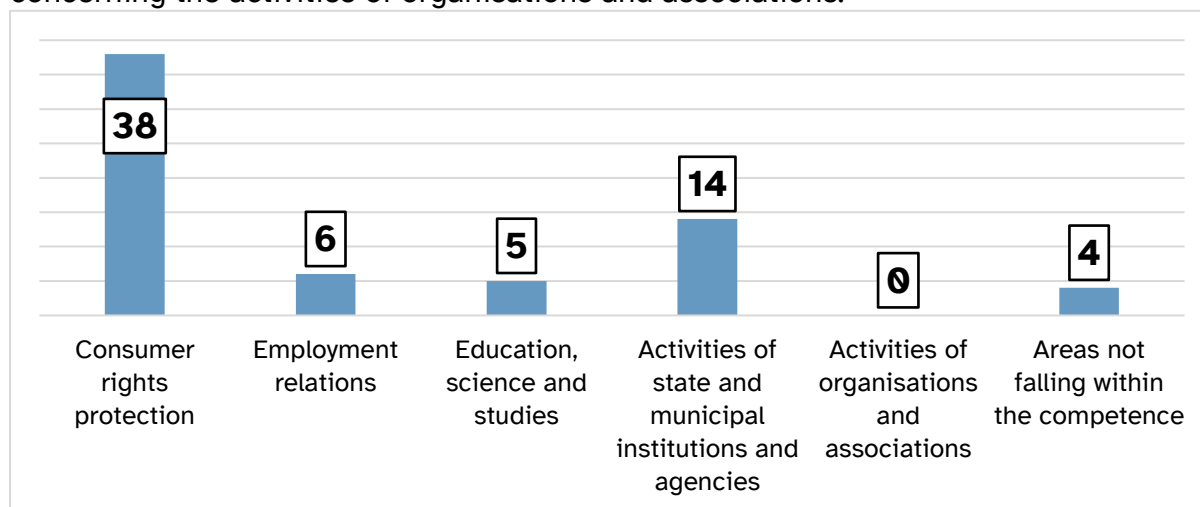


Figure 13. Distribution of complaints and investigations launched at the Ombudsperson's initiative by field.

In 2024, following 25 investigations into possible discrimination, 15 violations of equal treatment on the grounds of disability were established. Most of these occurred in the field of consumer rights protection (see Figure 14).

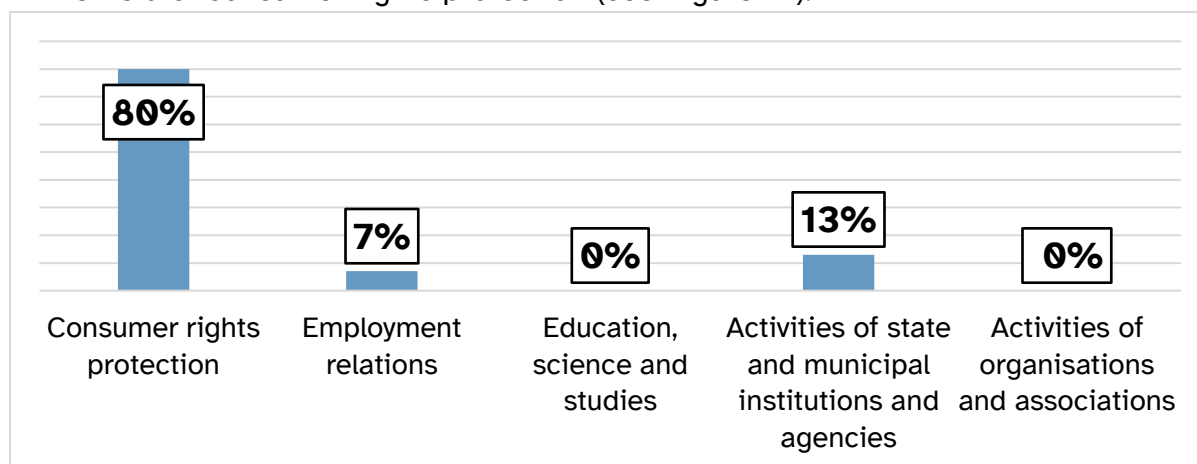


Figure 14. Distribution of established violations by field

Relevant examples

Example 1

In May 2024, a complaint was received regarding parcel lockers operated by “Omniva” UAB, which were not adapted for use by persons with visual impairments. The complainant informed the Office that due to the lack of accessibility, they were unable to collect a parcel independently. When the issue was reported to the company, they were advised to seek assistance from relatives. Following an investigation, the Ombudsperson [established discrimination](#) and issued the company with a warning. A recommendation was also made to adapt the parcel lockers as soon as possible to ensure that they can be used independently by all persons with visual impairments.

Example 2

In November 2023, a deaf person submitted a complaint to the Office concerning harassment by an intercity bus driver – the driver’s aggressive behaviour frightened the deaf passenger, communication was unpleasant, and she expressed anger and dissatisfaction. Following the investigation, Children’s Rights Ombudsperson Edita Žiobienė, acting as substitute for the Equal Opportunities Ombudsperson, [issued a warning](#) to the company “Kautra” and recommended that it revise its passenger service rules, adding provisions on how staff should interact with passengers with various disabilities.

Example 3

In December 2023, a complaint was received concerning discrimination at work against a person with a disability. After returning to work following a serious illness, a construction engineer at Vilnius University Hospital Santaros klinikos was forced to fight to keep his job. At first, the duties of the man, now using a wheelchair, were changed; later, he was offered a different position with lower pay, and when he refused, he was no longer assigned any work at all. The individual submitted a complaint to the Office, which, after conducting an investigation, [concluded](#) that the employee had been discriminated against on the grounds of disability. Santaros klinikos were recommended to cease actions that violate equal treatment and to assign the complainant tasks that are compatible with his state of health and job position.

Example 4

The Office received a complaint concerning discrimination against a woman with a disability after Mažeikiai District Municipality Administration refused to organise a meeting remotely, during which complaints submitted by the applicant to the municipality were to be examined. The woman requested permission to participate remotely, as her health condition made it difficult for her to attend in person, and the municipality building was not adequately accessible for persons with mobility impairments. The resident submitted her disability certificate and documents confirming a limited level of functional capacity. Following an investigation, the Ombudsperson [issued a warning](#) to Mažeikiai District Municipality for violating the Law on Equal Treatment, and recommended that it ensure the participation of persons with disabilities in relevant processes, including by organising meetings remotely or in a hybrid format. To prevent similar situations in future, the municipality was also advised to amend its statutes so that interested parties with a legitimate interest in

Example 5

The Ombudsperson initiated three investigations based on information received from the Union of People with Epilepsy “Epilė”. All investigations examined whether service providers – [“Kūdikių SPA” UAB](#), [“Molėtų baseinas” UAB](#), [Public enterprise “Klaipėdos pliažo tinklinio klubas”](#) and [Public enterprise “Tinklinio akademija”](#) – were discriminating against persons with epilepsy in their access to services. All investigations were discontinued, as the institutions removed restrictions that had prohibited persons with epilepsy from using swimming pools, and persons with epilepsy and mental health conditions from playing beach volleyball. They also amended internal rules where such prohibitions had

The following trends in enquiries emerged in 2024:

- There was an increase in enquiries from deaf persons and sign language users.
- Enquiries were received regarding systemic issues faced by persons with visual impairments – for example, concerning physically inaccessible institutions and public spaces, or restricted access to shops when accompanied by assistance dogs.
- Following the entry into force of the Disability Reform in January 2024, the Office received enquiries concerning its implementation. For instance, individuals asked whether their benefits would be reduced as a result of the work capacity level being replaced with the participation level, as well as changes in the entire disability assessment system.
- Enquiries were received about challenges related to caring for relatives (e.g. the need for social and medical support). In such cases, individuals are referred to the Agency for the Protection of the Rights of Persons with Disabilities.

The new version of the Law on the Fundamentals of Protection of the Rights of Persons with Disabilities of the Republic of Lithuania introduced a provision stipulating that persons with disabilities have the right to use assistance dogs, and the right to enter and remain in public spaces, buildings and facilities for public and other purposes with such dogs, as well as to use public transport facilities and benefit from the concessions set out in the Law on the Transport Privileges of the Republic of Lithuania.

Enquiries received indicate that, in practice, the implementation of this provision causes difficulties for persons with disabilities. In 2024, three complaints and several enquiries were submitted regarding situations in which persons with disabilities accompanied by an assistance dog were denied access to public spaces or asked to leave, resulting in a failure to receive services or humiliation of dignity.

It should be noted that the above-mentioned legal regulation cannot be effectively implemented, since there are currently no natural or legal persons in Lithuania training assistance dogs who meet the competence requirements set out in the law. Due to these and other legal gaps, the Office contacted the Ministry of Social Security and Labour and, together with the Commission for the Monitoring of the Rights of Persons with Disabilities, prepared recommendations on how to improve the legal framework and address other challenges related to ensuring the right of persons with disabilities to freely use assistance dogs.

As in previous years, the following trends persist:

- Enquiries continue to be received regarding inaccessible buildings, public places and institutions for persons with disabilities.
- Persons actively seek consultations and submit complaints regarding information inaccessibility.
- Persons with disabilities contact the Office about locked public toilets adapted for their use.

2.4. Possible Discrimination on the Grounds of Race, Nationality, Language, Origin, Ethnic Origin and Citizenship

In 2024, the Office received 29 complaints concerning possible discrimination on the grounds of a person's race, nationality, language, origin, ethnic origin and/or citizenship²⁰, and conducted 5 investigations. The Office was contacted 213 times in writing, 46 times by phone, and 2 times in person regarding possible discrimination on these grounds.

Complaints and enquiries submitted on these grounds are discussed together, as such situations are usually closely interconnected or overlapping, or individuals themselves specify several identity-related characteristics at once when reporting possible discrimination.

²⁰ Legal protection against discrimination, as established in the Law on Equal Treatment, applies only to citizens of the EU and the European Economic Area.

The number of complaints received and investigations launched at the Ombudsperson’s initiative on these grounds has remained relatively stable over the past few years and is lower than for other identity-related characteristics (see Figure 15).

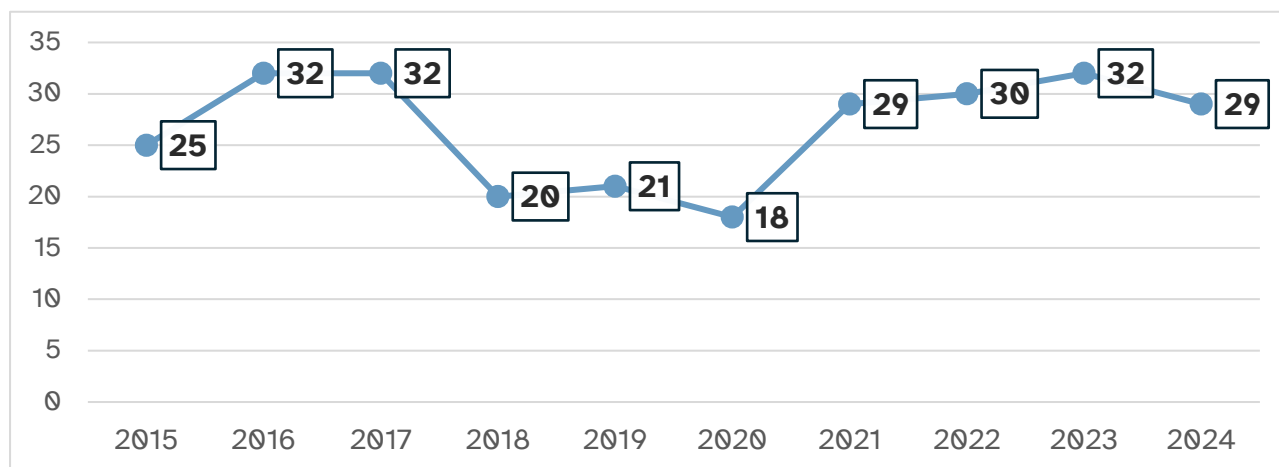


Figure 15. Dynamics of complaints and investigations launched at the Ombudsperson’s initiative since 2015

The highest number of complaints concerned possible discrimination in the field of consumer rights protection (13 complaints) (see Figure 16).

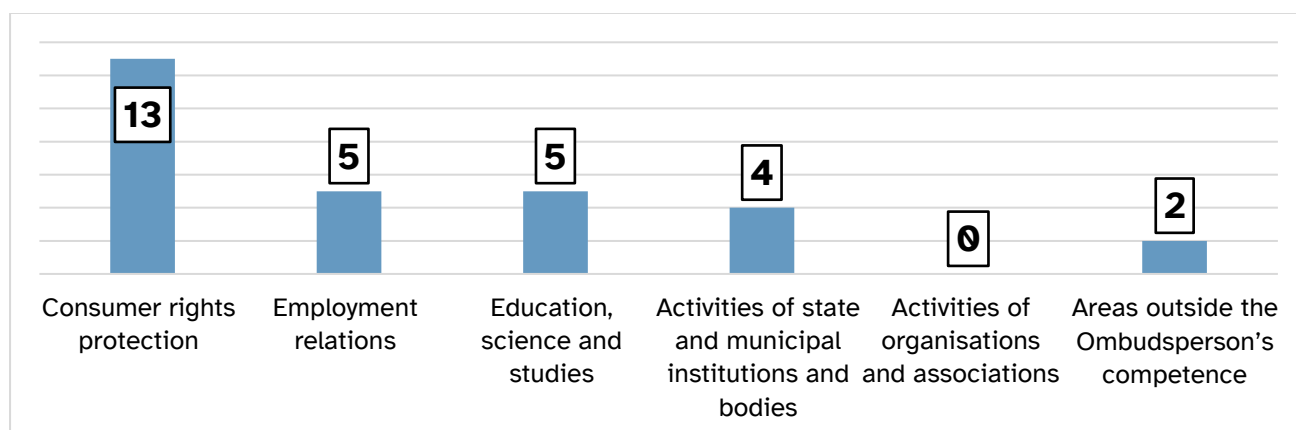


Figure 16. Distribution of complaints and investigations launched at the Ombudsperson’s initiative by field

In 2024, two violations were established in the field of consumer rights protection: one on the grounds of race, nationality and origin, and another on the grounds of nationality and origin.

Relevant examples

Example 1

In November 2023, the Office received a complaint concerning discrimination at the Vilnius nightclub “Rumor Lounge”. The complaint stated that two black men were asked to leave the club, allegedly due to an unpleasant odour. Their friends who witnessed the incident were convinced that the real reason was the men’s skin colour. During the incident, four friends were dancing when a security guard approached and asked only the two black friends to leave. The others were welcome to stay. During the investigation, the Office contacted “Rumor Lounge” requesting clarification of the circumstances, an explanation of the legal grounds on which the visitors were asked to leave, and a copy of the club’s internal rules. However, the Office received no response – the club did not reply to any of the three written and telephone enquiries. Under the Law on Equal Treatment, the burden of proof lies with the respondent to demonstrate that the principle of equal opportunities was not violated. As the club failed to do so, the circumstances set out in the complaint were relied upon and a violation of equal treatment was [established](#).

Example 2

In December 2023, the Office received a complaint concerning a product sold by the “Prezo” bakery named Čigoniška užkepėlė (“Gypsy bake”). The complainant, a woman, stated that such a name demeans persons of Roma ethnicity. The Office contacted the bakery to inquire whether Roma representative organisations had been consulted when assigning the product name. The bakery’s management [responded](#) promptly and discontinued the product. They also assured the Office that if the product were to be reintroduced, it would be sold under a different name. The investigation into possible discrimination was discontinued.

Emerging trends in enquiries in 2024:

- Enquiries were received regarding the language used during consultations in medical institutions – individuals contacted the Office because they were not provided with information in Russian or English. In response to these complaints, it was noted that state medical institutions are not required to ensure that doctors speak foreign languages. The Ministry of Health of the Republic of Lithuania was recommended to consider adopting a procedure for serving patients who do not speak Lithuanian, and to inform such patients of this procedure when they contact medical institutions.
- Several students from third countries approached the Office requesting an investigation into why those admitted to Lithuanian universities receive visas more easily (and quickly) than those admitted to Lithuanian universities of applied sciences. The complainants believed they were being discriminated against on the basis of social status (i.e. because they study at the universities of applied sciences rather than universities). It should be noted that the

Ombudsperson could not launch an investigation due to a legal exemption – under the Law on Equal Treatment, the grounds of citizenship applies only to citizens of EU and EEA countries and their family members. The situation changed when the Migration Department amended the visa issuance procedure, which is now applied equally to all international students.

As in previous years, the following trends persist:

- The Office continues to receive enquiries from persons of Roma ethnicity regarding possible harassment in medical institutions. It is observed that medical institutions are actively taking measures to address cases of potential harassment.

2.5. Possible Discrimination on the Grounds of Age

In 2024, the Office received 37 complaints concerning possible discrimination on the grounds of age, and 2 investigations were launched at the initiative of the Ombudsperson. In total, 17 investigations were carried out. The Office was contacted 178 times in writing, 126 times by phone, and 7 times in person regarding possible age-based discrimination.

The number of complaints and investigations initiated by the Ombudsperson has varied over the past decade, and in 2024, it was lower than in 2023 (see Figure 17).

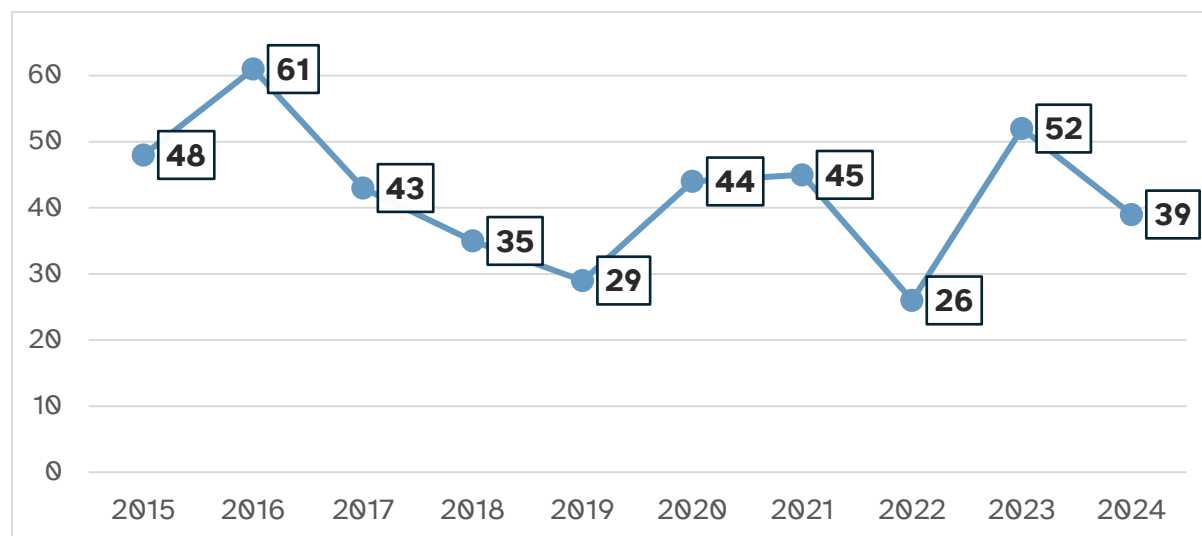


Figure 17. Dynamics of complaints and investigations launched at the Ombudsperson's initiative since 2015

The highest number of complaints concerned possible discrimination in the field of consumer rights protection (17 complaints) and in the field of employment (13

complaints) (see Figure 18).

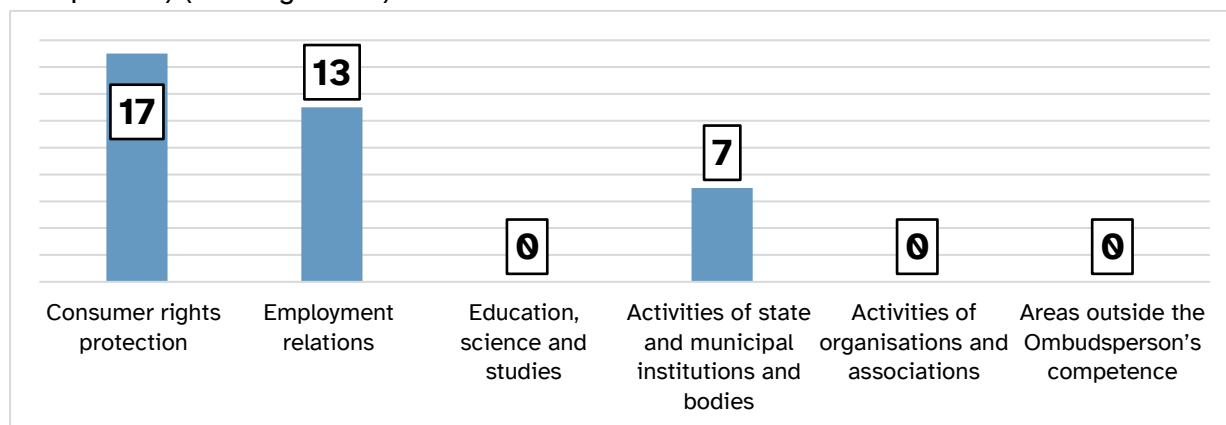


Figure 18. Distribution of complaints by field

Relevant examples

Example 1

In August 2024, the Office received a complaint regarding the internal rules of “Luminor” bank, which stipulate that individuals over the age of 75 are not granted credit. The complainant stated that she had been denied an extension of her credit card despite having stable income and being a long-standing client of the bank. During the investigation, the Equal Opportunities Ombudsperson [concluded](#) that such a provision of the credit institution was discriminatory. “Luminor” bank confirmed that it would review its credit provision rules and also offered the client a reassessment of her creditworthiness, taking other criteria into account.

Example 2

In September 2024, the Office received a complaint regarding a decision by Vilnius City Municipality to eliminate the option of purchasing tickets with cash on trolleybuses and buses. The complaint stated that this disproportionately affects older people. Following an investigation, the Ombudsperson noted that the municipality’s decision created additional difficulties for individuals who do not use mobile apps or contactless bank cards, and in some cases, effectively prevented them from purchasing tickets altogether. Having assessed the arguments provided by the municipal company “Susisiekimo paslaugos”, the Ombudsperson [concluded](#) that Vilnius City Municipality had failed to properly implement the provisions of the Law on Equal Treatment. The law stipulates that legal acts must guarantee equal rights and opportunities regardless of age, social status or other personal characteristics. The Municipality was also issued a recommendation to ensure that tickets for public transport in the city can be purchased not only electronically. After reviewing the recommendation, representatives of the Municipality informed the Office that they do not intend to amend the current procedure.

Example 3

In 2024, the Ombudsperson initiated two investigations concerning the accessibility of travel insurance services provided by the companies [BTA Baltic Insurance Company](#) and [Compensa Vienna Insurance Group](#) for older persons. The investigations assessed whether the information about these services contained provisions that discriminated on the basis of age. In both cases, discrimination was not established, but the Office recommended that additional information be provided to clients, clearly outlining alternative ways for persons over the age of 75 to enter into travel insurance contracts. Both companies updated the information on their websites in line with the Office's recommendations.

In 2024, six violations of equal treatment were identified: five in the field of consumer rights protection, and one in the field of employment.

Trends in enquiries in 2024:

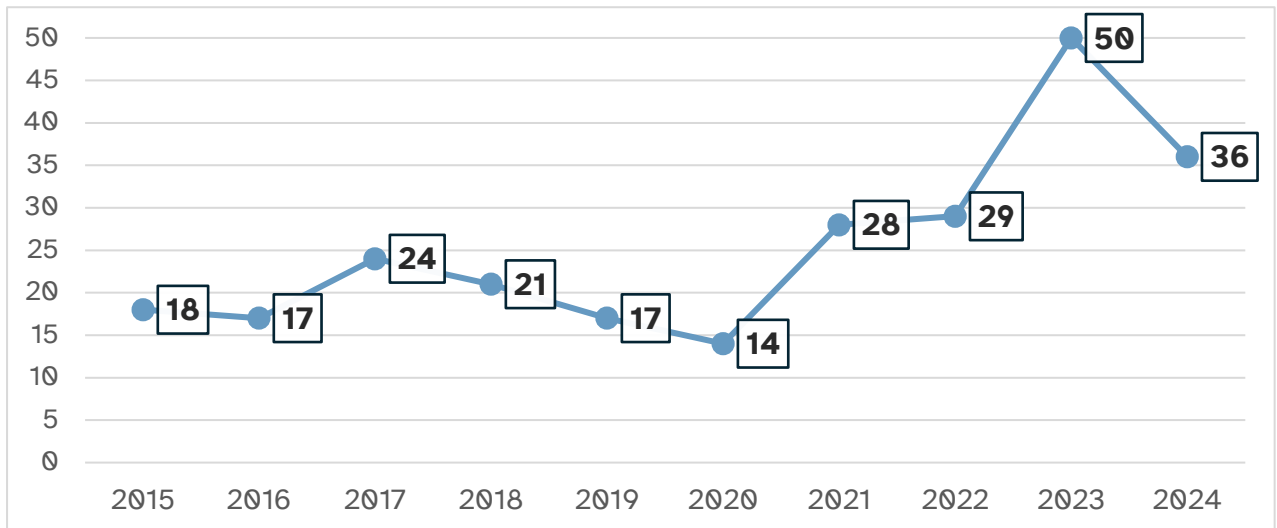
- an increase in enquiries related to the (in)accessibility of digital services for older persons.

As in previous years, the following trends remain:

- people continue to report age-based restrictions on access to banking services. For example, when an upper age limit is set for service provision, or when certain benefits are offered exclusively to younger clients;
- individuals submit enquiries regarding preventive health screening programmes that apply to specific age categories;
- the Office receives complaints about discriminatory job advertisements in which the preferred age of the employee is specified;
- older persons contact the Office regarding possible age-based harassment in the workplace – for example, where less favourable working conditions are imposed on older employees or they are treated worse due to their age.

2.6. Possible Discrimination on the Grounds of Social Status

In 2024, 35 complaints were received and 17 investigations were carried out concerning potential discrimination on the grounds of social status²¹. One investigation into a possible violation in the field of state and municipal institutions and agencies was initiated by the Ombudsperson. A total of 135 written enquiries were submitted regarding discrimination, 75 were made by telephone, and one



person visited the Office in person.

Figure 19. Dynamics of complaints and investigations initiated by the Ombudsperson since 2015

In both 2023 and 2024, the number of complaints and investigations initiated by the Ombudsperson on the grounds of social status was higher than at any point in the past decade (see Figure 19). This increase is related to the expanded definition of social status in the Law on Equal Treatment, which now includes family status in the list of protected identity characteristics.

The highest number of complaints concerned potential discrimination in the activities of state and municipal institutions and agencies (13 complaints), while the fewest were related to the fields of education, science and studies. No complaints were received in 2024 regarding the activities of organisations and associations (see

²¹ The Law on Equal Treatment defines social status means education, qualification acquired by a natural person or his/her studies at higher education and research institutions, his/her property, income, need for state support provided for in legal acts and/or other factors related to the financial/economic situation of the person.

Figure 20).

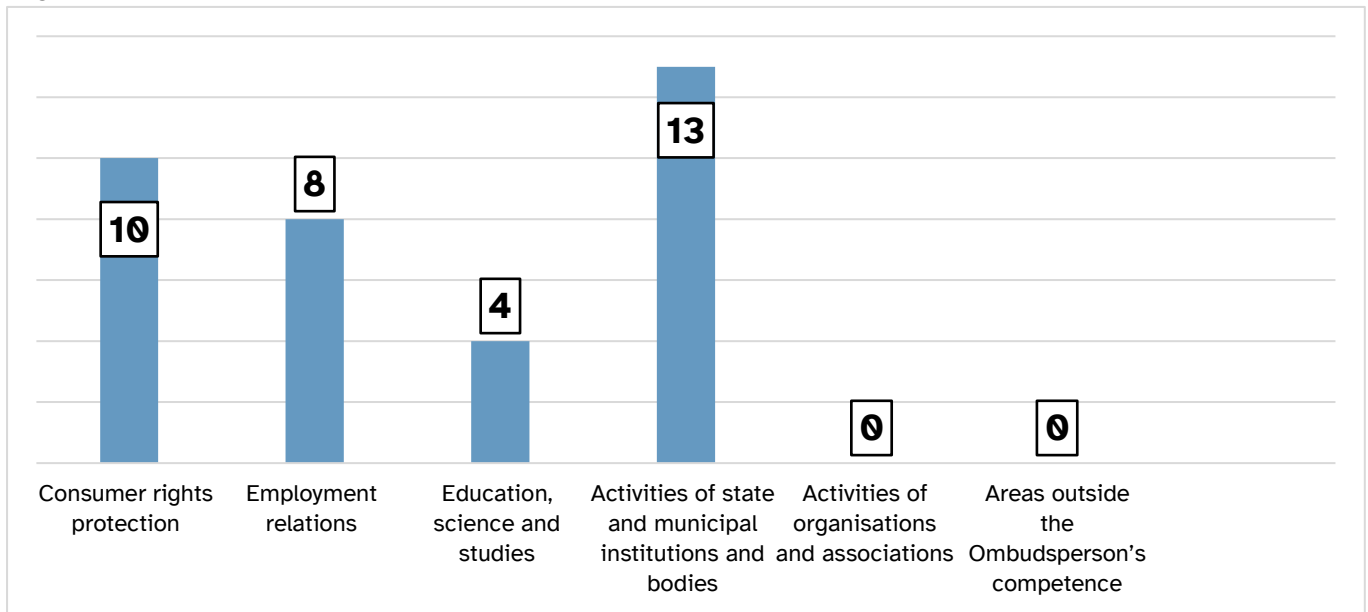


Figure 20. Distribution of complaints by field.

In 2024, four violations were identified: two in the field of consumer rights protection and two in the field of education, science and studies. In other cases, discrimination was not established.

Relevant examples

Example 1

In September 2024, a complaint was received from a former voluntary serviceman who stated that he was denied the additional half-point bonus in the admission process to Klaipėda University for his completed military service. According to the university's regulations, such a bonus is only granted to individuals who have completed compulsory military service or basic military training. After conducting an investigation, the Equal Opportunities Ombudsperson determined that this unequal treatment of individuals with military preparedness constitutes discrimination. According to the Office, voluntary non-permanent military service should be recognised on equal terms with other forms of military service when applying to higher education institutions. The Ombudsperson [issued a warning](#) to Klaipėda University for violating the Law on Equal Treatment and recommended that the relevant institutions amend the higher education admissions procedure to allow the allocation of additional points also for voluntary non-permanent military service.

Example 2

In February 2024, a student submitted a complaint to the Office regarding Kaunas University of Technology, where she was not provided with the opportunity to combine her studies with motherhood. The complaint requested an investigation into whether the university's internal regulations – which allow individual study timetables in cases of long-term care of relatives but not for infant care – were discriminatory. [During the investigation](#), the discriminatory practice was discontinued, and the student was granted the opportunity to reconcile her studies

Emerging trends in 2024 enquiries:

- Enquiries were received regarding possible harassment on the grounds of family status, where families reported disrespectful treatment in service provision settings due to being accompanied by young children (e.g. when bringing children to a doctor's office or other institutions).

As in previous years, the following trends continued:

- Enquiries were received concerning situations related to being on parental leave and other challenges connected to family status.
- People contacted the Office about discounts for families offered by service providers that were not applicable to families with more than two children.

- ☑ When reporting potential discrimination, individuals often interpret social status more broadly than it is defined in the Law on Equal Treatment. For example, complaints are submitted in relation to job positions, place of residence, tax payments, allocation of compensation, access to social support, and eligibility for various energy efficiency incentives. These complaints fall outside the remit of the Office and the individuals are referred to other competent institutions.

2.7. Possible Discrimination on the Grounds of Religion, Convictions or Views

In 2024, 9 complaints were received concerning possible discrimination on the grounds of convictions or views, and 3 complaints on the grounds of religion. Four complaints concerned situations that fall outside the Equal Opportunities Ombudsperson’s remit. In addition, 102 written enquiries and 14 telephone enquiries were received by the Office regarding possible discrimination on the grounds of religion, convictions or views. These grounds are discussed together, as the situations are often interrelated, and those submitting enquiries frequently cite them jointly.

The dynamics of complaints and investigations initiated by the Ombudsperson in 2024 remained very similar to those in previous years²² (see Figure 21).

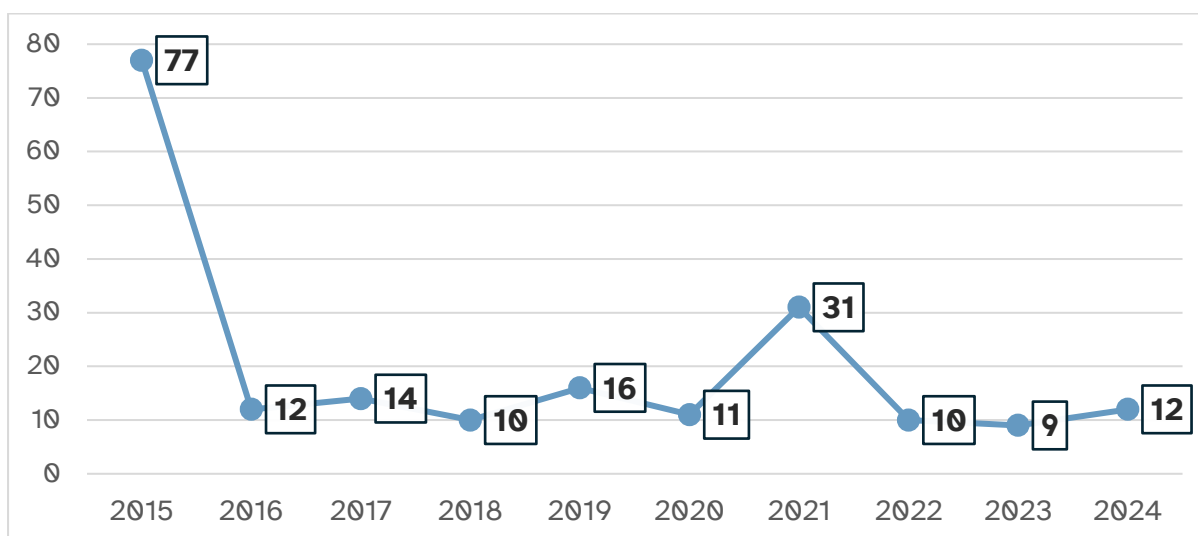


Figure 21. Dynamics of complaints and investigations initiated by the Ombudsperson since 2015

In 2024, one violation [was established](#) following a complaint received in October 2023. The complaint concerned the Director of the Stasys Eidrigevičius Arts Centre,

²² One notable exception is 2021, when the Office received a higher number of complaints related to mandatory and recommended vaccinations during the coronavirus pandemic (it should be noted that the majority of these complaints did not fall within the Equal Opportunities Ombudsperson’s remit).

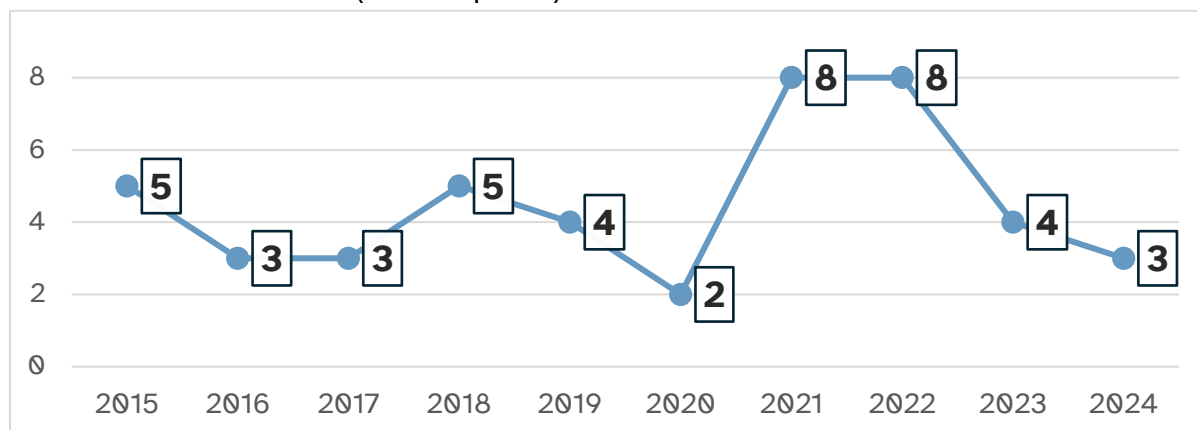
who prohibited the use of rainbow colours in the logo of the centre’s unit “Pragiedruliai” on a banner for the Panevėžys city anniversary parade. Acting Equal Opportunities Ombudsperson – the Children’s Rights Ombudsperson Edita Žiobienė – concluded that, by not allowing the Panevėžys-based artist to represent the cultural institution “Pragiedruliai”, which he heads, using rainbow colours during the city’s celebratory parade, the Stasys Eidrigevičius Arts Centre discriminated against the employee on the grounds of his convictions and views.

As in previous years, the following trends persist:

- ☑ Individuals in correctional facilities continue to submit complaints to the Office. These most often concern the conditions provided for Muslim inmates to practise religious rites and access religious literature. Such complaints are forwarded to the Lithuanian Prison Service.
- ☑ Inmates filing complaints regarding the actions of correctional facility officers often indicate that they may have experienced discrimination on the grounds of religion.

2.8. Possible Discrimination on the Grounds of Sexual Orientation

In 2024, three complaints were received regarding possible discrimination on the grounds of sexual orientation. In addition, 103 written enquiries were submitted, five consultations were held over the phone, and one person visited the Office in person. Each year, only a few complaints concerning discrimination based on sexual orientation are received (see Graph 22).



Graph 22. Dynamics of complaints and ex officio investigations on the grounds of sexual orientation since 2015.

In 2024, two complaints were received concerning possible discrimination in the field of consumer protection, and one concerning the activities of state and municipal institutions and agencies. The Equal Opportunities Ombudsperson identified one violation in the field of consumer protection. The circumstances of the investigation are not made public at the request of the complainant.

As in previous years, the following trends persist:

- People do not report potential violations of their rights. In 2024, the majority of enquiries concerning sexual orientation were related to issues of equal opportunities mainstreaming, discrimination prevention, and awareness-raising.

2.9. Possible Multiple Discrimination

Multiple discrimination refers to situations in which a person is discriminated against on the basis of several personal characteristics at the same time (e.g. age and disability, or nationality and language). A person may also face discrimination where these identity characteristics interact, and this interaction increases the risk of discrimination. For example, in some cases, women with disabilities may be in a more vulnerable situation than women without disabilities or men with or without disabilities.

In 2024, 23 complaints were received concerning possible multiple discrimination²³. In their written or telephone enquiries, people often indicated that they had experienced discrimination on the grounds of more than one identity characteristic – in total, 169 enquiries related to possible multiple discrimination were received in 2024. This is especially common in cases involving reported discrimination based on nationality, ethnic origin, citizenship, language or origin. It was also observed that social status frequently interacts with a person's age or disability.

Based on the statistics collected on enquiries from the public, it was found that when complaints are submitted via the online complaint form on the Office's website, applicants are more likely to select several grounds for prohibited discrimination, but provide data relating to only one. In such cases, the Office asks for clarification on the circumstances under which less favourable treatment occurred in relation to the other indicated characteristics. If this is not provided, the investigation is conducted only on the basis of the events for which information has been submitted. Therefore, not all cases where applicants select multiple grounds in their complaint can be classified as cases of multiple discrimination.

²³Total number as a proportion of all complaints received.

Relevant examples

Example 1

In November 2023, a complaint was received regarding the discount policy at the National Drama Theatre, which offered concessions to young people under the age of 25, people with mobility disabilities, and seniors. A theatre patron contacted the Office asking whether such discounts were compatible with the principles of equal opportunities. After assessing the situation, the Equal Opportunities Ombudsperson concluded that the theatre had not provided objective justification for applying the discount exclusively to individuals under the age of 25. As a result, this practice was found to be in violation of the provisions of the Law on Equal Treatment. The Ombudsperson recommended reviewing and potentially adjusting the upper age limit for youth discounts. During the investigation, the theatre promptly revised its discount scheme for persons with disabilities – initially limited only to those with mobility impairments – and therefore this part of the inquiry was discontinued.

Example 2

In May 2024, a cyclist submitted a complaint to the Office regarding the rules of the Lithuanian Mountain Bike Championship. According to the regulations, due to her gender and age, the complainant was not permitted to compete in an appropriate race category or to qualify for a monetary prize. She also noted that the top three male finishers in the competition were awarded €200, €150, and €100 respectively, while the prizes for women cyclists were significantly smaller – €70, €50, and €40. These amounts were even lower than those specified in the competition rules, which stated that women's prizes should be €50 less than those awarded to men. The complaint also pointed out that both male and female athletes were required to pay the same registration fee. Upon conducting an investigation, the Equal Opportunities Ombudsperson found that the event organisers had failed to ensure equal opportunities to participate in the championship and issued a warning for discrimination against women.

2.10. Implementation of the Ombudsperson's Recommendations

Upon completing an investigation and establishing a violation of the Law on Equal Treatment or the Law on Equal Opportunities for Women and Men, the Equal Opportunities Ombudsperson may issue the following recommendations ²⁴:

²⁴ Article 29 of the Law on Equal Treatment

- discontinue actions that breach the principle of equal opportunities;
- amend or repeal an administrative act or decision (or part thereof) related to the violation. In practice, this may involve recommending changes to discriminatory service provision procedures, a ministerial order that contravenes equal opportunities, or another legal act not carrying the force of law.

The Office conducts [ongoing monitoring](#) of the implementation of recommendations. This process may take time, as implementation may require legal amendments, additional investment, or systemic changes.

In 2024, the Ombudsperson issued eight decisions containing recommendations – five of which were implemented. Over the past three years (2022–2024), 65% of the Ombudsperson’s recommendations were implemented.

Several positive examples from 2024 demonstrate how institutions took responsibility and initiated change following the identification of breaches:

- The Lithuanian National Drama Theatre revised its youth discount policy and extended concessions to persons with different types of disabilities.
- The Hospital of Lithuanian University of Health Sciences Kauno Klinikos responded to the Office’s recommendation by updating internal rules on acceptable workplace conduct and the promotion of equal opportunities.
- Klaipėda City Municipality acted on the recommendation to revise internal regulations to ensure beachgoers feel safe and respected, and do not experience harassment based on gender, gender identity, or other personal characteristics.
- The Ministry of Education, Science and Sport announced plans to amend legislation to ensure equal conditions for all individuals who have completed any form of military service to receive additional entry points for state-funded higher education programmes.
- The Ministry of National Defence is preparing legal amendments that would allow people who do not meet the medical or age requirements for compulsory military service to join on a voluntary basis.

2.11. Case Law

In 2024, the Office participated in 16 judicial proceedings. In 9 of these, the Office was the respondent, as the Ombudsperson’s decisions were challenged: in 4 cases, the decisions were appealed by legal entities who had committed the violations and disagreed with the findings; in 5 cases, the applicants appealed after their

complaints were dismissed due to no violation being established. The majority of these cases are still ongoing.

In 6 cases, the Office acted as an amicus curiae (expert) by providing legal opinions in court proceedings. In 2024, the Office issued opinions in 3 cases concerning the rights of transgender minors to change their forename, surname and personal identification number in official documents. Other cases involved the rights of parents with disabilities to raise their children, the right of a minor to study in a religious school, and the right of a person with a disability to live in a social care institution. The case files for all of these proceedings are not publicly available.

In addition, the Office was involved as a third party in one judicial proceeding in 2024.

3. Mainstreaming Equal Opportunities

The Law on Equal Treatment provides that the Equal Opportunities Ombudsperson shall issue recommendations and proposals on ensuring equal opportunities, improving legislation, and establishing policy priorities, as well as carry out prevention, awareness-raising, and dissemination activities related to equal opportunities.

[Equal opportunities mainstreaming](#) is implemented through:

- developing and applying equal opportunities mainstreaming measures;
- increasing the competence of public and private sector organisations in ensuring equal opportunities and preventing discrimination;
- integrating the principle of equal opportunities into national and other levels of public policy processes (for example, in the development of public policy plans, programmes and their measures, municipal strategic documents, secondary legislation, various procedures, etc.);
- engaging in national and international cooperation.

The Office offers organisations [free seminars and e-learning courses](#) on preventing discrimination and promoting equal opportunities. In 2024, the Equal Opportunities Mainstreaming Group at the Office conducted and organised 33 seminars:

- 11 on ensuring equal opportunities in the workplace,
- 3 on employing persons with disabilities,
- 5 on ensuring equal opportunities in the field of education,
- 7 for municipal employees on mainstreaming equal opportunities
- 3 for ministries on ensuring equal opportunities in projects.

A total of 885 individuals participated.

More than 3,800 people took part in e-learning to deepen their knowledge: 238 individuals explored how to ensure equal opportunities in municipalities (153 completed the module “Gender Equality Solutions for Successful Municipalities”, and 85 – “Integrating the Gender Perspective into Service Provision”). A further 3,581 participants developed their competence in implementing equality and non-discrimination policy in the workplace.

3.1. Ensuring Equal Opportunities in Public Policy Development

In 2024, the Office continued to educate municipal employees on integrating the principle of equal opportunities into municipal activities – for example, when drafting strategic documents of municipal administrations, implementing various social and educational projects, or conducting public procurement. A total of 115 municipal representatives from Molėtai, Ignalina, Vilkaviškis, Panevėžys city and district, and Elektrėnai municipalities took part in consultations and training. Training on integrating equal opportunities into EU-funded projects was also provided to project implementers from the Ministry of the Interior, the Ministry of Foreign Affairs, and the Ministry of Finance.

The Office contributed to the development of the Ministry of the Economy and Innovation’s plan to promote socially responsible strategic public procurement. The aim of the plan is to coordinate the efforts of relevant institutions to expand the use of public procurement in tackling environmental and social issues and in promoting innovation in Lithuania. Experts from the Office delivered a lecture to staff of the Central Purchasing Organisation on the practical application of the socially responsible procurement criterion Implementation of Gender Equality and Non-Discrimination on Other Grounds, including examples of good practice. The Office also participated in training organised by the Public Procurement Office, where it gave a presentation to service providers on implementing gender equality and non-discrimination through public procurement.

3.2. Equal Opportunities in the Labour Market

The Office annually provides consultations to workplaces on ensuring equal opportunities and creating an inclusive working environment. In 2024, the Equal Opportunities Mainstreaming Group consulted 90 companies and institutions and delivered competence-building seminars in 11 workplaces. A total of 360 employees participated in these seminars.

To ensure systematic and consistent equal opportunities mainstreaming in the workplace, the Office uses [a five-step programme](#) when consulting employers. It includes:

1. Understanding and commitment to the principles of equal opportunities
2. Situation analysis
3. Planning
4. Implementation
5. Evaluation and self-assessment

To support situation analysis in workplaces, the Office offers the [Equal Opportunities Ruler](#) tool. This year, 14 workplaces made use of the tool: the administrations of Trakai District, Kaišiadorys District and Palanga City Municipalities, Ignalina Nuclear Power Plant, Ministry of Foreign Affairs, Innovation Agency, Smiltynė Ferry, Youth Affairs Agency, and the companies “Eurointegracijos projektai”, “Vilniaus vandenys”, “Vilniaus šilumos tinklai”, “Agrokonzernas”, “Agrokonzerno grūdai” and “IKI Lietuva”.

Another tool developed by the Office to assess progress in the field of equal opportunities – the [Equal Opportunities Wings](#) – was used by seven workplaces over the past year: Šiauliai City Municipality Social Services Centre, the Ministry of Social Security and Labour, Lithuanian Airports, Lithuanian Railways, “DPD Lietuva”, the National Audit Office of Lithuania, and the Office of the President of the Republic of Lithuania.

As of 1 December 2024, amendments to the Law on Equal Opportunities for Women and Men entered into force, transposing 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. Large companies [are now required to submit information to the Office](#) regarding the implementation of gender balance in their management and supervisory bodies.

Employment of Persons with Disabilities

In 2024, particular attention was given to the topic of employing persons with disabilities.

The Law on the Fundamentals of Protection of the Rights of Persons with Disabilities stipulates that, from 1 January 2024, all state and municipal institutions, enterprises and joint-stock companies with 25 or more employees must ensure that at least 5 percent of their staff are persons with disabilities. In response to the challenges organisations face in attracting employees with disabilities, the Office organised training sessions titled “Employment of Persons with Disabilities: What Is Important to Know”. These were attended by 65 participants from both the public and private sectors.

The sessions addressed key aspects of employing people with disabilities, including how to overcome prevailing fears and stereotypes in the workplace. The programme also covered the recruitment process, responsibilities related to onboarding employees with disabilities, and options for workplace adaptation and accessibility.

3.3. Equal Opportunities in Educational and Training Institutions

2024 m. In 2024, the Office actively contributed to strengthening gender equality in the education sector by organising seminars and lectures attended by nearly 200 professionals working in education, textbook authors, and lecturers.

In September, in cooperation with the National Agency for Education, the Office held a seminar titled “How to Ensure Gender Equality When Developing Educational Materials?” for authors and publishers of textbooks and other teaching resources. Participants deepened their understanding of the causes of gender inequality and enhanced their competencies in creating learning materials that promote gender equality and fairness.

In October, the Office invited educators from the city of Šiauliai to a training session titled “Ensuring Equal Opportunities in Educational Institutions”. School leaders were introduced to the key aspects of promoting equal opportunities in educational settings. The session explored methods for fostering open and respectful learning environments, principles for developing inclusive teaching materials, and the importance of preventing harassment and sexual harassment. A lawyer from the Office presented examples of complaints and investigations concerning potential discrimination in education, helping educators better understand equal opportunity challenges and how to address them.

In December, in partnership with Vytautas Magnus University’s Professional Competence Development Centre two lectures were organised for university lecturers: “How to Convey Gender Equality Principles in Teaching?” and “How to Teach Future Teachers about Gender Equality Principles?” Aimed at academic staff and those involved in teacher training, the sessions provided insights into integrating gender equality into teaching content. Discussions also addressed how educational content can contribute to promoting human rights and preventing gender-based violence.

To support academic staff in higher education, the Office prepared recommendations titled [“How to Integrate Gender Equality Principles into Teaching Practice?”](#).

At the end of the year, in cooperation with the Lithuanian Agency for Non-Formal Education, the Office hosted a training session titled “How to Nurture Talent Free from Gender Stereotypes?”. The session targeted career guidance coordinators, career specialists, and school administrators. Participants explored the importance of gender equality in education and career guidance, and discussed ways to foster an environment that enables everyone to realise their potential – regardless of gender stereotypes.

3.3. National and International Cooperation

National cooperation

In 2024, the Office became involved in the development of the third phase of the national action plan *Women, Peace and Security*, coordinated by the Ministry of Foreign Affairs. The aim of the plan is to increase women's participation at all levels of decision-making and implementation.

In the autumn, together with the Ministry of Social Security and Labour and the State Data Agency, the Office helped to establish an interinstitutional *Equality Data Collection Working Group*. Its goal is to develop a national strategy for the collection and dissemination of equality data, based on good practices and experience from other countries. It is hoped that the strategy will improve the collection and comparability of data on vulnerable social groups, thereby contributing to the development of evidence-based public policy.

As in previous years, the Office's staff participated in events organised by other organisations and institutions, where they shared expert knowledge and the Office's experience in the field of equal opportunities. In 2024, presentations were given at the [annual Diversity Charter Conference](#), the international conference of the European Network on Gender and Violence hosted by Vilnius University, the scientific-practical conference *Equal Opportunities Begin Here* organised by the Ministry of Social Security and Labour, the national conference *Public Policy and Service Evaluation: Objectives, Accessibility and Effectiveness* organised by Vytautas Magnus University, and the public forum *Reasonable Accommodation: Ensuring Rights Begins with Dialogue* held at the Presidential Office. In addition, discussions were held with members of the Lithuanian Union of the Blind and Partially Sighted on the available means of redress in cases of discrimination, and a presentation was given at the Vilnius Central Library on physical accessibility requirements, universal design, and the Office's practice.

To mark International Human Rights Day, the [7th National Human Rights Forum](#) was held in December. The Office curated two discussions during the event – [Gender Equality in Lithuania Yesterday and Today: Why is it Still Normal to Lift Girls' Skirts?](#) and [Gender Equality in Childcare. The First Year of the Work-Life Balance Directive – How Are Fathers Getting Involved?](#)

International cooperation

In April, an expert from the Office took part in the Communications Lab creative workshop in Brussels, organised by the European Institute for Gender Equality. Together with communications professionals from across Europe, she shared good practices in the field of gender-based violence. The invitation to participate followed the Office's awareness campaign [Women to Women](#), which had been recognised

during an institute-led study as a leading example of how to communicate about violence against women.

On the Office's initiative, the EQUINET training session Equality Bodies Using Situation Testing was held in Vilnius in 2024, bringing together the Policy Formation and Research & Data Collection working groups. A total of 37 participants from various European countries took part in the session.

In preparation for the transposition of the Artificial Intelligence Act into Lithuania's legal system, experts from the Office took part in international training and conferences to enhance their knowledge of the potential challenges posed by AI and automated decision-making systems to the implementation of equal opportunities.

In October, the Office met with a representative from the Office of the Council of Europe Commissioner for Human Rights to present the most pressing issues related to the promotion of equal opportunities and the challenges facing human rights protection in Lithuania.

In November, representatives of the Office participated in a meeting in Vilnius between the delegation of the European Economic and Social Committee and Lithuanian public institutions responsible for policies on violence against women and gender-based violence. The delegation sought to understand how Lithuania ensures protection from gender-based violence and carries out related prevention measures.

4. Educational and Preventive Activities

4.1. Gender-based violence

At the beginning of 2024, particular attention was given to the issue of violence against women with disabilities – the project [SEEN: Gender Based Violence Against Women with Disabilities in Focus](#) was successfully completed.

At the end of the project, an overview of the situation was published: [Violence against Women with Disabilities: the Readiness of Municipal Administrations to Organize Accessible Assistance and Prevention](#). It presented data from all 60 Lithuanian municipalities on their readiness to coordinate the domestic violence protection system, provide assistance and related services to victims, and conduct domestic violence prevention. The study revealed significant gaps in assistance for women with disabilities who experience violence. For example, although municipalities are [obliged](#) to establish domestic violence prevention commissions, representatives of disability communities are included in these commissions in only 28 out of 60 municipalities. More than half of the municipalities claimed that their services (e.g. temporary accommodation institutions, crisis centres) are accessible to persons with disabilities; however, the research showed that only a little more than 10 institutions in Lithuania are adapted for all types of disabilities.

In response to recent demographic changes in Lithuania, the information website on gender-based violence – www.visureikalas.lt – was updated with new translations into English, Ukrainian, and Russian.

At the beginning of 2024, a public opinion [survey](#) on attitudes towards women with disabilities and violence against them – first conducted at the start of the project – was repeated. Although 1 in 4 respondents noted an increase in public information about violence against women with disabilities over the past two years, the data show that public attitudes are changing slowly, especially regarding women with intellectual and psychosocial disabilities.

In two years, the proportion of respondents who believe that women with physical disabilities can live independently increased from 54% in 2022 to 61%. The share of people who believe that women with visual impairments cannot live independently or make their own decisions decreased from 33% to 26%. Unfortunately, attitudes regarding the financial independence of women with intellectual or psychosocial disabilities have not improved: more than half of survey participants still disagree that these women can be financially independent from a spouse or relatives. Survey results also continue to reflect a tendency to blame victims: 41% of respondents believe that women with intellectual disabilities often provoke their partners' violence. A similar opinion was held by 35.5% of respondents regarding women with psychosocial disabilities.

Symbolically launched on 14 February, a public awareness campaign under the project targeted individuals who may recognise signs of domestic violence experienced by women with disabilities in their communities. The campaign aimed to raise awareness of such violence, encourage people not to remain indifferent, and



guide survivors towards appropriate support services. During the campaign, information on these topics was widely disseminated through various media channels: a total of 20 press releases, articles, and expert commentaries were broadcast on television and radio programmes. The campaign's messages also reached the public through social advertisements on television and social media ([video 1](#), [video 2](#)), radio spots, and billboards in major Lithuanian cities.

At the same time, an information campaign was carried out for women with various disabilities. Posters were distributed in support centres, group homes, public libraries, and other locations.

4.2. Discrimination Against Older People

In 2024, the Office continued its work on investigating discrimination against older people – a strategic priority since 2023.

This year, the focus was placed on the provision of goods and services and the experiences of older people facing digital exclusion. Both qualitative and quantitative studies were carried out, culminating in the publication of the [report Digital Exclusion among Older People](#), which includes recommendations for policymakers and service providers. During the non-representative study, residents aged 55 and over – as well as their family members – completed paper and online questionnaires and anonymously shared their experiences of encountering digital barriers when accessing services or purchasing goods. In addition, in-person meetings were organised with communities of older people (focus groups). A total of 1,982 people took part in the quantitative survey, and a further 24 individuals participated in the focus group discussions.

The study revealed that for some older individuals, the increasing digitalisation of services poses significant accessibility challenges. When traditional alternatives to

digital services are not provided, a large part of society becomes marginalised from social life. As many as 40% of respondents aged over 55 reported difficulties registering online for appointments with doctors or other specialists. Every third person found it challenging to purchase public transport tickets online. Nearly 4 in 10 said they faced serious difficulties in accessing discounts that were only available through mobile apps. One in five respondents experienced difficulties paying bills online.

The greatest challenges were reported by people over the age of 75, older women, and residents of smaller towns and rural areas. The findings also revealed that one in four individuals aged over 75 either do not use internet banking or have chosen to stop using it due to its complexity. Almost half of respondents indicated that digital technologies are difficult to access because of issues related to English-language proficiency (45%) and the risk of fraud or scams (43%). Another 37% cited concerns about the protection of personal data and privacy violations.

At the end of the year, the Office prepared a legal review titled [Discrimination against Older Persons in the Provision of Services](#). The review examined the Office's casework on complaints submitted by older persons in the area of service provision, assessed information from credit institutions regarding the issuance of consumer loans and credit cards to older individuals, and addressed specific situations in which older people experienced service restrictions due to services being available only through electronic means.

4.3. Artificial Intelligence and Equal Opportunities

In 2024, the Office became involved in the process of transposing the European Commission's Artificial Intelligence Act into the national legal framework. The Office's team took part in meetings with the Ministry of the Economy and Innovation, the Communications Regulatory Authority, and the Innovation Agency – the institutions responsible for the implementation of the Act in Lithuania. The meetings addressed institutional and interinstitutional roles regarding the implementation of the AI Act in Lithuania, the functions and rights of the Office and other human rights institutions, the role of regulatory sandboxes²⁵ mentioned in the Act, and related projects, cooperation needs, and possibilities.

²⁵ A regulatory sandbox – a controlled environment where companies and public sector organisations can safely test new products, services or technological solutions based on algorithms and automated decision-making. Various aspects can be tested here – from data protection (e.g. compliance with GDPR requirements) to the safeguarding of ethical principles. The purpose of such a space is to help developers find ways for their solutions to comply with legislation, human rights standards and other regulatory rules before being implemented in the real market. For example, if a company is developing a new artificial intelligence system to help determine loan eligibility, the regulatory sandbox would allow it to test how the algorithm uses data, whether it complies with GDPR requirements and whether it respects human rights. By testing such solutions under the supervision of regulators, the company could verify whether its system meets all legal and ethical standards before bringing it to market.

In November, the Office of the Equal Opportunities Ombudsperson, the Seimas Ombudsmen's Office, the Office of the Ombudsperson for Children's Rights, and the Office of the Inspector of Journalist Ethics were designated as Lithuania's key human rights institutions in cases involving the use of high-risk artificial intelligence systems. These institutions were granted the right to:

- Request and obtain all documents safeguarded under the Artificial Intelligence Act related to the use of high-risk AI systems, where access is necessary to effectively perform their mandates;
- Request the market surveillance authority to carry out technical testing of a high-risk AI system if the available documentation is insufficient to ascertain that no EU human rights regulations have been violated.

These rights also entail the following obligations:

1. Inform the market surveillance authority (the Communications Regulatory Authority of the Republic of Lithuania) of any request submitted for access to safeguarded documentation;
2. Cooperate with the market surveillance authority responsible for organising the technical testing of high-risk AI systems;
3. Comply with the confidentiality requirements stipulated in the Artificial Intelligence Act.

In May 2024, the Office – together with partners from Estonia, including the Estonian Gender Equality and Equal Treatment Commissioner, Tallinn University of Technology, and the Estonian Ministry of Justice – launched the EU co-funded project [EquiTech – improving response to risks of discrimination, bias and intolerance in automated decision-making systems to promote equality](#). The project aims to expand and strengthen the knowledge of public institutions and their partners in Lithuania and Estonia regarding discrimination risks in automated decision-making systems, and to support representatives of the public and private sectors in developing AI products that integrate equal opportunity principles.

In collaboration with Estonian partners, [a comparative analysis](#) of the national legal frameworks of Lithuania and Estonia was conducted. The aim of this analysis was to assess the current legal regulations in both countries governing protection against discrimination and potential bias in the deployment of algorithmic systems. In other words, the goal was to identify potential legal gaps that may hinder effective prevention of discrimination arising from the use of artificial intelligence and automated decision-making systems.

Experts from the Office travelled to the Netherlands and Germany to learn about the prevention of algorithmic discrimination²⁶ in those countries. The visits also served as an opportunity to exchange insights on the national transposition processes of the EU Artificial Intelligence Act in the Netherlands and Germany, and to share good practices in the use of various tools in the field of automated decision-making.

4.4. Ensuring the Rights of Trans People

In 2024, the Office devoted significant attention to the issue of trans people's rights. Continuing the project Centering the Voices of Transgender People, the Office published a comprehensive [National Review of the Situation of Trans People](#), which assesses how the rights, opportunities and challenges faced by trans people in Lithuania have changed over the past five years²⁷. The review also highlights real-life experiences and provides specific recommendations to help ensure equality for trans people.

In June, the Office presented a [media content analysis](#) focused on how trans people are portrayed in various Lithuanian media outlets, what perspectives are formed, and how frequently the voices of trans people are included. The findings revealed that while trans issues receive considerable media coverage – with 4,249 references to trans identity or gender identity recorded over two years – the voices of trans individuals were present in only 2 per cent of publications. The analysis also revealed that many articles stigmatised trans people, repeating stereotypes rooted in ignorance and fear. Alarmist rhetoric was found to be common, framing trans identity as a threat to traditional norms or something that is “spreading” or being “promoted”. Religious beliefs and freedom of speech were also frequently invoked to incite fear. Based on this analysis, the Office produced [media guidelines on how to report on trans people and gender identity respectfully and accurately](#).

On 19 September, the MO Museum hosted the international conference TRANS FORUM: Trans Rights, Experiences and Issues. The event featured the launch of the National Review of the Situation of Trans People in Lithuania, an overview of how gender identity is protected under Norwegian law, and the steps that led to gender identity being recognised as a protected grounds against discrimination. It also addressed the challenges faced by trans asylum seekers and refugees in the European Union and access to healthcare for trans individuals. The event brought together 170 participants.

²⁶ Algorithmic discrimination – discrimination that occurs when a computer programme or algorithm treats people unfairly or unequally based on their race, gender, age or other personal identity characteristics.

²⁷ The Office carried out its first review of the situation of trans people in 2019. The review is available online: <https://lygybe.lt/leidiniai/translyciu-asmenu-padetis-lietuvoje-nacionaline-apzvalga/>

In 2025, the Office plans to present a study on the challenges faced by trans people in the labour market and to launch a public awareness campaign on the issues affecting trans communities in Lithuania.

4.5. Awareness of the Office and Information on Human Rights

Every year, the Office conducts a nationally representative survey to measure public awareness and trust in the institution. According to the survey conducted at the beginning of 2025, a majority of Lithuania’s residents (81 per cent) had heard of the Office. This figure is nearly unchanged from the previous year – in 2024, 82 per cent of respondents reported being aware of the Office. Awareness was higher among older people and those with higher education.

Public trust in the Office increased. In response to the question “Do you trust the Office of the Equal Opportunities Ombudsperson?”, 34 per cent of respondents said yes, and 23 per cent said no. In 2024, these figures were 31 per cent and 26 per cent respectively. The proportion of those with no opinion remained unchanged at 43 per cent (see Figure 23).

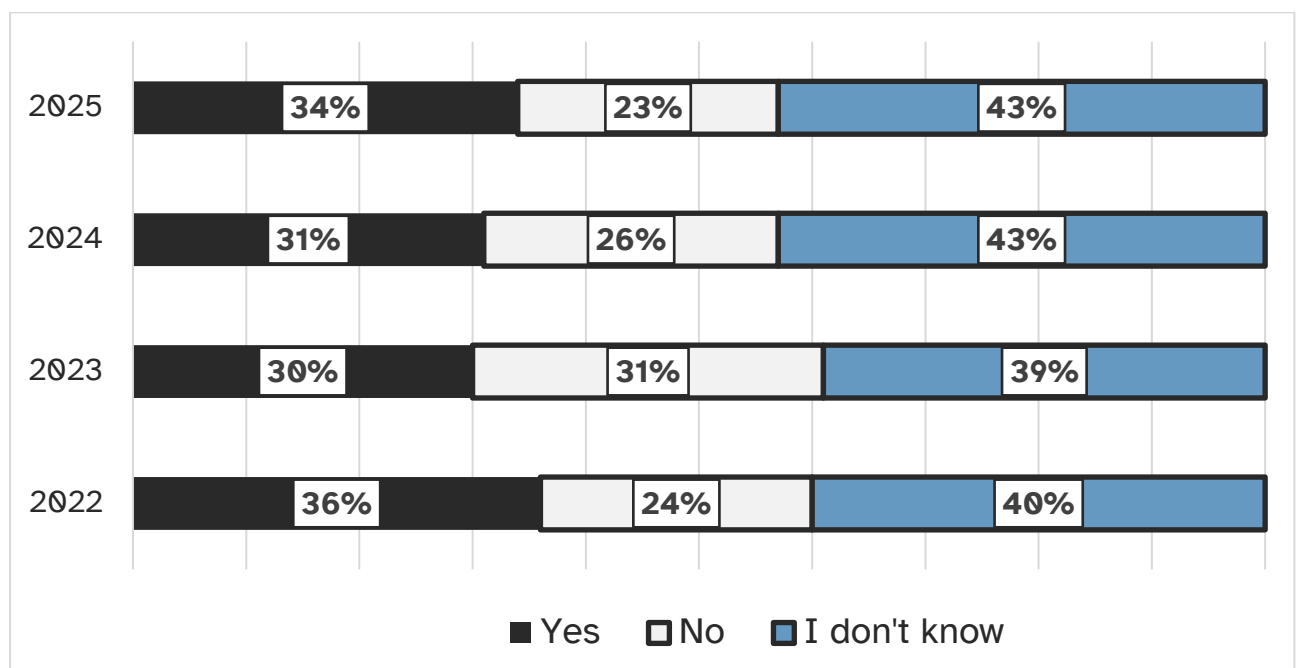


Figure 23. Responses to the question “Do you trust the Office of the Equal Opportunities Ombudsperson?”

Compared to 2024, the number of respondents stating they would turn to the Office in cases of discrimination decreased slightly. In 2025, 40% of respondents indicated they would do so, down from 43% in 2024. Younger people were more likely to say

they would contact the Office in the event of discrimination (see Figure 24).

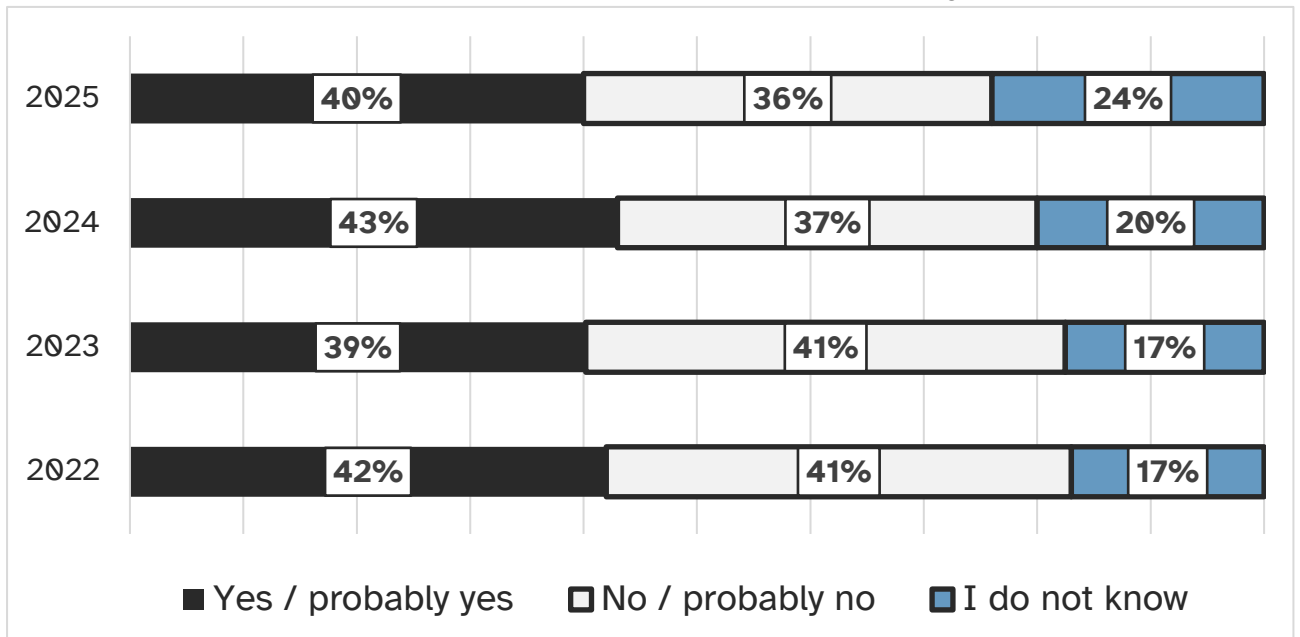


Figure 24. Responses to the question “Would you contact the Office of the Equal Opportunities Ombudsperson if you experienced discrimination?”

Another 2024 [survey](#) conducted by the Office revealed general perceptions among the public regarding human rights and the institutions that protect them. 64% of respondents said they had sufficient information about human rights. This view was more prevalent among people with higher education (76%) than those with lower levels of education (47%). Disagreement levels also varied: two out of ten respondents with higher education and four out of ten without upper secondary education said they lacked sufficient information on human rights. A lack of information was also acknowledged by some residents of smaller towns and rural areas.

When asked whether they would know where to turn in the event of a human rights violation, 61% of respondents answered affirmatively. Most indicated they would first contact the Office of the Equal Opportunities Ombudsperson (48%), followed by the police or prosecutor’s office (47%). However, [international studies](#) show that, when experiencing discrimination, people are most likely to talk to a friend or family member first (40%).

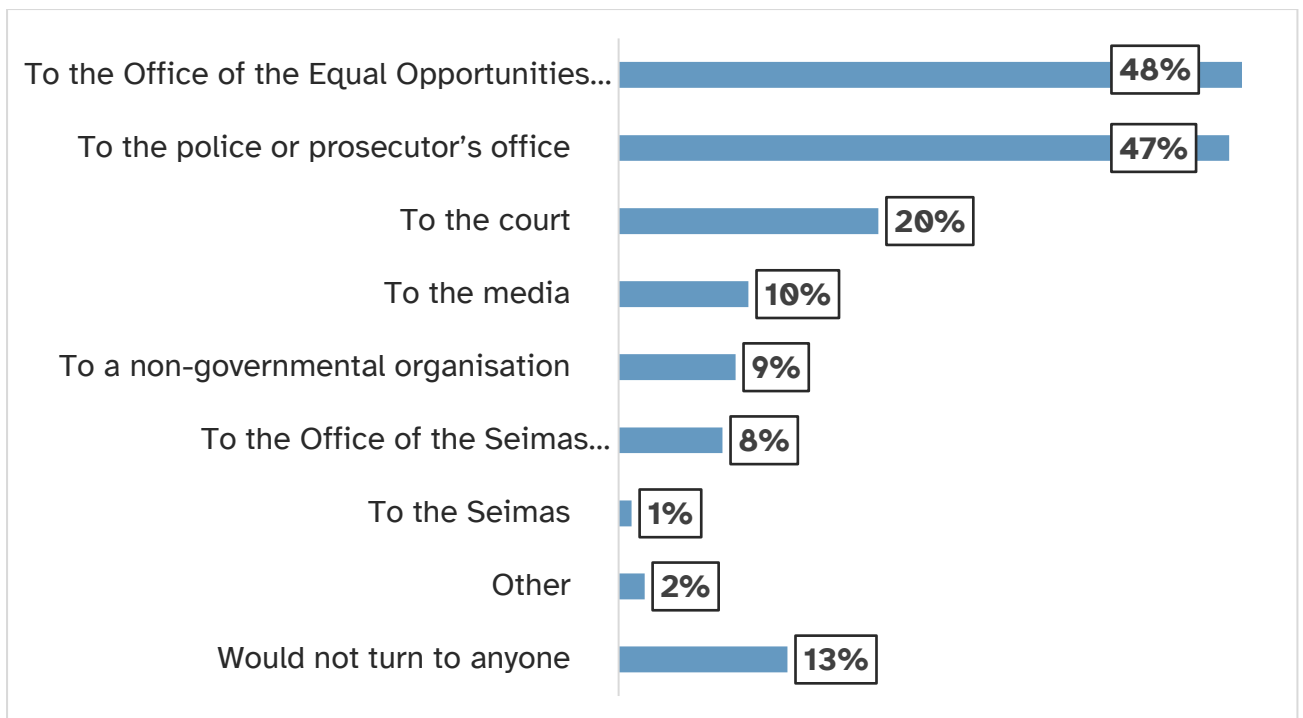


Figure 25. Responses to the question “Whom would you contact first in the event of a violation of your human rights?”

In 2024, the Office continued its efforts to improve the accessibility of its information. Key content on the website www.lygybe.lt was translated into Polish and Russian. Texts in easy-to-read language were prepared to explain the Office’s functions, the concept of equal opportunities and discrimination, and the procedure for submitting complaints.

The Office’s visibility in the media increased slightly. In 2024, journalists contacted the Office 181 times (compared to 169 times in 2023). The Office was mentioned 1,342 times in the media, most frequently on news portals such as LRT.lt (102 mentions), Diena.lt (86), and 15min.lt (75), as well as on LRT Radio (26 mentions) and LRT Television (25 mentions).

5. Human and Financial Resources

In 2024, the Office employed 21 staff members: 11 civil servants and 10 employees under employment contracts. Six students undertook academic internships at the Office.

Throughout the year, staff participated in the work of seven Equinet (European Network of Equality Bodies) working groups and clusters: Gender Equality, Communication Strategies and Practices, Research and Data Collection, Artificial Intelligence Cluster, Standards for Equality Bodies, Disability Cluster, and Policy Formation.

Experts from the Office also took part in two national working groups: one coordinated by the Ministry of the Interior aimed at promoting an effective response to hate crimes and hate speech in Lithuania, and another coordinated by the Ministry of Social Security and Labour – the Family Policy Commission.

In 2024, staff continued to strengthen their qualifications in the areas of equal opportunities, finance, document management, law, public procurement, artificial intelligence, data protection, stress and conflict management, and communication.

As in previous years, considerable attention was paid to supporting the emotional well-being of the Office team. Team-building sessions were held for each unit, as well as stress management training and supervision for the management team. At the end of the year, training sessions on strategic and action plan development were held. In 2025, an assessment of psychosocial risks is planned.

In 2024, the Office received €847,000 from the state budget. More than 76 per cent of this amount was allocated to staff remuneration. The expenditure for projects funded by the EU and other international financing mechanisms totalled €141,900. The budget allocated to the activities of the Commission for the Monitoring of the Rights of Persons with Disabilities under the Office of the Equal Opportunities Ombudsperson amounted to €20,800, of which €17,800 was allocated to the remuneration of commission members, and €3,000 to operational expenses. In 2024, the Office utilised 99.99 per cent of its allocated budget.

The Office conducted 155 public procurements. The most frequently procured services were event organisation.

6. Proposals for Legislation and Strategic Documents

Each year, the Office submits proposals concerning legislation and other strategic planning documents. Upon completing investigations into potential discrimination cases or carrying out independent situation reviews, the Equal Opportunities Ombudsperson also issues recommendations for improving the existing legal framework, where this relates to ensuring equal opportunities and preventing discrimination.

In 2024, the Office submitted 22 opinions and/or recommendations concerning national legislation, and 12 related to EU directives and other legal instruments via the Lithuanian EU membership information system (LINESIS).

The key proposals, recommendations and opinions included:

- Amending Article 133 of the Labour Code to equalise the conditions for granting paternity leave in cases of childbirth and adoption.
- Recommending that Klaipėda City Municipality amend local legislation defining the boundaries of public beaches to avoid discrimination against men. The Office also proposed adopting or revising legislation to ensure that individuals using Klaipėda's public beaches feel safe and respected, and do not experience harassment based on gender, gender identity or other personal characteristics. To help create a safe and respectful environment, the Office recommended drafting and adopting rules regulating harassment prevention and safety in beach areas.
- Recommending that the Lithuanian National Drama Theatre amend its internal legal acts regarding youth discount eligibility.
- Submitting a proposal to the Ministry of Social Security and Labour concerning the Law on the Family Card of the Republic of Lithuania. The Office recommended evaluating the definition of a "large family" (as outlined in Article 2(1) and other legislation) to clarify whether a partner's or spouse's cohabiting children (who are not adopted) are considered part of the family.
- Recommending that the Office of the Government of the Republic of Lithuania review the criteria outlined in the Government Resolution governing the honorary donor title – currently awarded to individuals who have donated blood at least 40 times or plasma at least 200 times and have been actively involved in voluntary donation for a minimum of 10 years. The Office proposed amending these criteria to ensure gender equality, given that women can donate blood less frequently for physiological reasons.
- Recommending that The Hospital of Lithuanian University of Health Sciences Kauno Klinikos supplement their internal rules of conduct with clear descriptions of inappropriate, unethical, or potentially harassing behaviour

between employees – for instance, by addressing professional norms around greetings, compliments or congratulations – and ensure that all employees are informed of and comply with these rules.

- ☑ Recommending that the Mažeikiai District Municipal Council's Ethics Commission more closely consider the participation of persons with disabilities in decision-making processes and, where necessary, amend internal legal acts to enable remote or hybrid participation in meetings for persons who are objectively unable to attend in person.
- ☑ Submitting a joint recommendation to the Ministry of National Defence and the Ministry of Education, Science and Sport to consider granting the same additional entrance points for university applicants who have completed voluntary reserve military service as are currently awarded for completing compulsory military service or basic military training.
- ☑ Recommending that Gym Plius UAB develop and adopt anti-discrimination rules – including provisions on sexual and other forms of harassment – to be applied in all client services. These rules should cover respectful and ethical treatment of clients regardless of gender, race, nationality, citizenship, language, origin, social status, religion, convictions or views, age, sexual orientation, disability, ethnic origin or belief.
- ☑ Recommending that the Ministry of Health, the Ministry of the Interior and the Police Department under the Ministry of the Interior – in the context of integrating the Information system for the electronic health services and collaboration infrastructure (IS EHSCI) with police registries – refrain from collecting data on individuals' mental or behavioural disorders. Instead, the Office recommended strengthening police officers' competencies in mental health to counter stigmatising perceptions and ensure they are appropriately trained to perform their duties in ways that safeguard the safety of officers, the public, and persons with psychosocial or intellectual disabilities, without collecting sensitive personal data.
- ☑ Following [an independent situation review on the readiness of municipal administrations to organise accessible assistance and prevention](#), recommendations for improving access to assistance for victims of domestic violence were issued to Lithuanian municipal administrations, the Ministry of Social Security and Labour, and State Data Agency.
- ☑ Following [the national review of the situation of transgender persons in Lithuania](#), recommendations for improving the situation were submitted to the Ministry of Social Security and Labour, the Ministry of Education, Science and Sport, the Ministry of Justice, and the Ministry of Health.
- ☑ Based on [a study on the digital exclusion of older persons, recommendations on ensuring access to goods and services for senior citizens](#) were submitted to Members of the Seimas, the Seimas Committees for the Future, Human Rights, and Social Affairs and Labour, to every municipality, the Association of

Local Authorities in Lithuania, the Ministry of Social Security and Labour, the Ministry of Transport and Communications, the Ministry of Health, the Ministry of the Economy and Innovation, the Office of the Government, and the Communications Regulatory Authority. Recommendations on improving access to services for older persons were also sent to the Bank of Lithuania and all essential service providers, including major retail chains and pharmacies, providers of water, gas, electricity, heating and other utilities, banks operating in Lithuania, Lithuanian Railways, bus fleets and passenger transport operators.

Summary and Conclusions

1. In 2024, the Office received more enquiries than in previous years – a total of 1,793. Of these, 261 were complaints concerning possible discrimination; 865 written consultations were carried out, 648 consultations by telephone, and 19 consultations in person.
2. Most complaints concerned possible discrimination in the field of consumer rights protection (121 complaints), and the fewest – in the field of education, science and studies (21 complaints). In 2024, no complaints were received concerning the activities of organisations and associations. The majority of complaints concerned possible discrimination on the grounds of disability (60 complaints), gender (59 complaints), age (37 complaints), and social status (35 complaints).
3. Written, telephone and in-person consultations most often related to ensuring equal opportunities in the field of consumer rights protection (607 instances) and employment relations (370 instances).
4. As in previous years, the Office also received enquiries falling outside the competence of the Equal Opportunities Ombudsperson. In 2024, 49 such complaints were submitted, and a further 462 consultations were held on grounds that are not included in the Law on Equal Treatment as prohibited grounds for discrimination. This indicates that people understand discrimination more broadly than is defined in equal opportunities legislation.
5. In 2024, the number of participants in training activities organised by the Office almost doubled: 885 people attended in-person seminars, and 3,819 completed the Office's e-learning modules. The Office provided equal opportunities consultations to 90 companies and institutions.
6. Public awareness of the Office remains very high – as many as 81% of Lithuanian residents have heard of the Office of the Equal Opportunities Ombudsperson. Trust in the Office has also increased slightly (34% of respondents in a representative survey expressed trust in the institution). In the event of experiencing discrimination, 40% of respondents indicated they would turn to the Office – more frequently among younger individuals.

Based on the enquiries and investigations conducted in 2024, the following key findings and conclusions can be drawn:

1. A trend has been observed whereby individuals tend not to attempt resolving issues with service providers before submitting complaints to the Office. In several cases, Office staff encouraged individuals to contact the service

provider directly first, which led to the resolution of some issues without launching a formal investigation into possible discrimination.

2. Following the 2022 amendment to the Law on Equal Treatment to include “family status” under the protected grounds of social status, most complaints in 2024 concerned restrictions in the field of goods and services on the basis of having children. Notably, families with more than four children reported feeling discriminated against due to their large-family status. A trend was identified whereby services were more often offered on favourable terms to families with one or two children, but not to those with more.
3. In complaints and enquiries regarding possible discrimination on the grounds of social status, it was noted that people tended to interpret the term “social status” far more broadly than defined in the Law on Equal Treatment. Many of the issues reported were thus outside the Ombudsperson’s mandate.
4. Complaints about advertisements that objectify, degrade or diminish women remain frequent. A trend was observed whereby advertisers increasingly withdraw such advertisements before an investigation is completed.
5. The Office continues to receive complaints and questions about school uniform policies that prohibit girls from wearing trousers.
6. There has been an increase in reports about psychologically unsafe and disrespectful workplace environments, as well as unacceptable and/or unethical behaviour towards employees, including possible harassment and sexual harassment.
7. As in previous years, complaints were received about job advertisements targeting only women, only men, or people below a certain age. The Office continues to face difficulties identifying companies responsible for discriminatory advertisements when such ads are published solely on social media – limiting the ability to launch formal investigations.
8. Following amendments to the Labour Code requiring employers to ensure a safe and non-violent working environment and prohibiting harassment, the Office has seen an increase in individuals seeking support, advice or investigations into harassment that is not linked to any protected characteristic. Members of the public often conflate the mandates of the Office and the State Labour Inspectorate – with issues such as mobbing, harassment, and psychological violence (unrelated to any protected grounds) commonly presumed to fall within the Equal Opportunities Ombudsperson’s remit.

9. [The study on the digital exclusion of older people](#) revealed that older individuals experience digital exclusion and its risks across all areas of life. The greatest impact of digital exclusion arises when essential services – those without which many older people cannot manage, such as healthcare, transport, food and goods – are moved to the digital environment. The issue is further exacerbated when previously available access at points of sale is withdrawn and no alternative methods of access are provided, or such alternatives are not effectively functioning. The groups most at risk of digital exclusion are people aged 75 and over, residents of rural areas, and older women.
10. The legal review [Discrimination against older persons in the provision of services](#) found that the requirements set out in legal provisions are often not adequately explained to older people taking out insurance policies. In many cases, they are not informed of the reasons why they are being asked to provide information about their age and state of health. The lack of clear communication between insurance companies and clients leads older individuals to believe they are denied insurance solely because of their age and that they are becoming a socially excluded group in society. The situational analysis also showed that older people may encounter – and do encounter – restrictions on their rights and opportunities to access certain services due to prevailing preconceptions and stereotypes.
11. [The National Review of the Situation of Trans People in Lithuania](#) showed that the Lithuanian legal system does not ensure equality for trans and non-binary people. Lithuania does not have a law on legal gender recognition that would provide for a swift, transparent and accessible gender recognition procedure, and individuals with non-binary gender identity are not afforded the possibility of choosing a third gender marker in their identity documents or omitting gender altogether. The scope and accessibility of the necessary healthcare services are limited. The study also revealed that trans and non-binary individuals face various forms of discrimination in different areas of life – when seeking employment, in the workplace, when looking for housing, or when accessing other services. Particularly vulnerable are trans people unable to change their identity documents, those living outside major cities, and trans women and other trans individuals assigned male at birth whose gender identity and/or gender expression is female. Their vulnerability is compounded by other identity characteristics and their intersection – particularly socioeconomic status, (mental) health status, ethnicity and age. Despite frequently experiencing discrimination or violence, these individuals rarely report such incidents due to a lack of trust in institutions and a belief that nothing will change or that their rights will not be protected.

12. The situational overview [Violence Against Women With Disabilities: the Readiness of Municipal Administrations to Organize Accessible Assistance and Prevention](#) revealed that Lithuanian municipalities lack data on domestic violence – particularly violence against women and men with disabilities – as well as proper coordination in this field and a comprehensive approach to addressing the problem. Too little attention is paid to violence prevention. The study found that municipal administrations lack clear guidance and methodological support on how to effectively carry out domestic violence prevention, how to coordinate the municipality’s work in the field of domestic violence protection, and how to ensure full accessibility of support and related services to all individuals, regardless of their gender and/or disability.

Recommendations

For policymakers

1. Amend the Law on Equal Treatment to include an obligation for organisations benefiting from voluntary activities to ensure equal opportunities for volunteers.
2. Supplement paragraph 4 of Article 5 of the Law on Equal Treatment to specify that state and municipal institutions and agencies, within the scope of their competence, must ensure equal opportunities – regardless of gender, race, nationality, citizenship, language, origin, social status, religion, convictions or views, age, sexual orientation, disability, ethnic origin or belief – not only when providing administrative and/or public services, but also when performing public and internal administration functions.
3. Grant the Equal Opportunities Ombudsperson the right to apply to the Constitutional Court regarding the compliance of legal acts with the Constitution and laws. This is particularly relevant in cases where, under the current scope of powers, the Ombudsperson cannot investigate specific regulatory legal acts.
4. Ensure the Equal Opportunities Ombudsperson's Office has the necessary human and financial resources to properly implement the Council Directive on standards for equality bodies in the field of equal treatment of persons, as well as the European Parliament and Council Directive on standards for equality bodies regarding equal treatment and equal opportunities for women and men in matters of employment and occupation. Amendments to the Law on Equal Treatment and an expansion of the Ombudsperson's functions are foreseen as part of the national transposition of these directives.
5. Consider amending legislation to introduce a requirement for individuals submitting complaints in the field of consumer rights to provide proof of having first approached the service provider, in order to resolve the issue more effectively and optimise the Office's resource management.
6. Taking into account the experience and practices of other countries – where discrimination-related investigations involving artificial intelligence systems and algorithms may take several years – consider extending the deadlines for conducting discrimination investigations currently set out in the Law on Equal Treatment.
7. Adopt a Law on Gender Recognition, based on the principle of self-determination, which would establish a quick, transparent and accessible administrative procedure allowing trans persons to update their forename, surname, gender marker and personal code in civil status records. It is also

recommended to introduce the option of a third gender marker in identity documents and to allow the possibility of not specifying gender.

8. Translate and adapt the 11th revision of the ICD (International Classification of Diseases) for Lithuania, and accordingly update the Procedure for the Diagnosis and Treatment of Gender Identity Disorder (Transsexualism) by removing pathologising terminology and provisions, and revising the document to ensure that trans identity is not treated as a disorder and not diagnosed as such. The provision of healthcare services to trans persons should be based on an informed consent model – enabling patients to make decisions independently after being provided with comprehensive information about the medical procedure, potential side effects and treatment duration.

Recommendations previously submitted but not yet implemented:

1. Given that many women continue to experience – or are at risk of experiencing – domestic violence each year, it is recommended that the gender aspect be incorporated into the Law on Protection Against Domestic Violence and other legal acts regulating assistance and responses to domestic violence. Legislative regulation should take into account the intersection of gender and disability in the provision of protection and assistance and should explicitly identify women with disabilities as a vulnerable group.
2. In light of the fact that trans persons face various forms of discrimination but are not protected under the law, it is recommended to include gender identity and gender expression as prohibited grounds for discrimination in the Law on Equal Treatment.
3. Considering that the LGBTI+ community in Lithuania faces structural discrimination and legal insecurity, it is recommended to adopt a partnership law that guarantees the dignity of family relationships between unmarried couples.
4. As discriminatory job advertisements are most often published on online job posting platforms, whose administrators are not responsible for ensuring compliance with legal requirements, it is recommended to consider introducing legal regulation establishing an obligation for the administrators of such platforms to ensure that published advertisements do not include requirements contrary to legal provisions.
5. When analysing documents of national importance that aim to improve the situation and drive change in specific areas of equal opportunities, experts from the Office observe recurring shortcomings: a lack of systemic approach; insufficient active and deliberate involvement of relevant stakeholders, especially from the public sector (e.g. responsible ministries); and a lack of comprehensive measures and adequate funding. It is recommended that risk factors for the implementation of plans and/or measures, and ways to manage them, be identified. It is also recommended to evaluate (audit) plans and/or measures implemented in previous periods in order to identify which ones were effective, had long-term impact and were efficient, as well as the challenges, shortcomings and risks encountered during implementation. By

analysing previous plans and/or measures in terms of the efficiency of resource use, continuity and other aspects, it would be possible to identify weaknesses and design higher-impact measures. Continuous funding must be ensured for the implementation of action plans.

6. Ensure that various strategic plans are aligned with European Union equality strategies, such as the EU Strategy on Combating Antisemitism and Fostering Jewish Life, the LGBTIQ Equality Strategy 2020–2025, and the EU Anti-racism Action Plan 2020–2025. It is recommended to consider adopting separate strategic plans to combat antisemitism, racism, xenophobia, Islamophobia and discrimination based on sexual orientation and gender identity.
7. Improve the Action Plan for Roma Inclusion until 2030 by defining a clear state vision and strategic objectives, and by outlining concrete, comprehensive and specifically Roma-targeted measures to achieve these goals. Consistent and targeted funding must be allocated for the implementation of the plan's activities.

Public authorities and municipal institutions

1. Collect and compile data on the situation of vulnerable groups and the accessibility of services provided by the state and municipalities, taking into account individuals' gender, disability, age, nationality and other identity-related characteristics.
2. Requests received by the Office reveal that, with the emergence of new societal relationships, some groups of individuals remain unprotected from discrimination. The Law on Equal Treatment provides protection only in cases where employment relationships exist – i.e. where an employee–employer relationship arises under the Labour Code or a similar legal arrangement. As new types of relationships emerge in society – some of which only partially resemble employment – protection from discrimination is not extended to the persons concerned. This applies, for instance, to self-employed persons and platform workers. It is therefore recommended that the Ministry of Social Security and Labour consider and draft legislative amendments to ensure protection against discrimination for self-employed persons.
3. Public authorities that will be responsible for the regulatory sandboxes to be established in accordance with the Artificial Intelligence Act (Regulation (EU) 2024/1689 laying down harmonised rules on artificial intelligence) should create a mechanism for regular and systematic cooperation with the Office and other human rights institutions, with a view to involving them in the operation of such sandboxes.
4. It is proposed that the Ministry of the Interior – in coordination with the working group on promoting an effective response to hate crime and hate speech in Lithuania – continue strengthening legal regulation in a consistent and principled manner and prepare the necessary amendments to the

Criminal Code of the Republic of Lithuania with a view to establishing bias motivation as a qualifying element in the classification of criminal acts.

5. Taking into account the growing number of complaints submitted to the Office in recent years regarding inaccessible (locked or fee-based) toilets for persons with disabilities in shopping centres, restaurants and other public places, it is recommended that the Ministry of Social Security and Labour and municipal administrations take action to ensure that toilets designated for persons with disabilities in public places, shops and institutions are freely accessible both to people with disabilities and to others who may have the same need due to health conditions.
6. Involve representatives of disability organisations and disability communities in municipal domestic violence prevention commissions. Ensure that different types of disability – physical/mobility, hearing, visual, intellectual and psychosocial – are represented in such commissions.
7. Conduct a comprehensive analysis of services provided in each municipality, including their accessibility and adaptation for persons with different types of disability. The evaluation should also include service quality. It is recommended that such a study across all Lithuanian municipalities be initiated by the Ministry of Social Security and Labour.
8. Since victims of violence often do not want to seek help in environments where people know each other, measures should be taken to ensure access to all support services regardless of a person's place of residence.
9. Ensure that all public services provided by state and municipal institutions are accessible not only digitally but also through alternative means – enabling individuals to access services and receive guidance in person (e.g. by telephone, at service desks or sales points, etc.).
10. Ensure the accessibility of state and municipal institutions' systems and websites for accessing information and services. Accessibility includes the use of legible fonts and appropriate font sizes, sufficient contrast between text and backgrounds, clear and comprehensible information, and the application of other measures set out in the Law on Accessibility Requirements for Products and Services. Since older persons often experience various disabilities and health-related challenges – leading to intersectional discrimination on the grounds of age and disability – it is recommended to ensure that websites, mobile applications and digital devices (e.g. ATMs, parcel terminals, ticket machines) are accessible to people with visual impairments and that information is also provided in alternative formats – in easy-to-read language, Lithuanian Sign Language and subtitled audio content.
11. Ensure that each municipality has institutions or institutional divisions providing digital assistance and consultations (e.g. in public libraries, social service centres), where older persons can receive personalised support when

needed. Given that many older people in Lithuania live alone, without family or far from relatives, it is essential to ensure access to digital assistance through accessible means – for example, via social workers. It is important that this support also be available to those living in smaller towns and rural areas. The role of social workers should be expanded so they can also provide digital support to older persons.

12. Involve organisations representing older persons in decision-making processes, particularly in cases where decisions directly affect older individuals and their participation in public life.

Recommendations previously submitted but not yet implemented:

1. When conducting various types of social research, surveys and data collection by gender, include more gender category options beyond just female and male, e.g. female, male, other, prefer not to disclose.
2. The Office's experts note that, at national, regional and local levels, public sector employees lack knowledge and understanding of equal opportunities, and of how their strategic documents, plans and measures should contribute to the implementation of the horizontal principle of equal opportunities. It is therefore recommended to ensure systematic and regular capacity-building for public sector employees by organising training sessions on the integration of the equal opportunities aspect.

For educational institutions

1. In view of recurring complaints regarding school uniforms, it is recommended that all schools in Lithuania remove restrictions that prevent female pupils from wearing trousers during school hours.
2. It is essential to ensure that study materials used in higher education institutions integrate the principles of gender equality. The reinforcement or reproduction of stereotypical gender roles in academic settings contributes to the formation of discriminatory attitudes, inequality and views that legitimise violence. Therefore, it is necessary not only to avoid stereotypes in study content and academic processes but also to actively implement measures for the prevention of sexual harassment, in order to create a safe and respectful environment in higher education institutions.

For service providers

1. Apply equal conditions for the provision of services to families, regardless of the number of children or the marital status of the service recipients (i.e. whether the adults are married or not).

2. Develop and approve customer service rules that include the prevention of discrimination, including harassment and sexual harassment, on all grounds prohibited under the Law on Equal Treatment.
3. Ensure that all essential services (i.e. those without which a large number of older people cannot manage – healthcare, transport, food and goods, etc.) are accessible not only digitally. Provide opportunities for individuals to receive assistance and consult in person about such services (e.g. by phone, at counters, at service locations, by visiting the service provider, etc.).
4. Considering that more than 120,000 people in Lithuania receive their old-age pension in cash at home, it is recommended to ensure that payment for goods and services is possible not only by bank card or other digital means, but also in cash when purchases are made in person.
5. Given that older people without digital skills often pay for essential services via intermediaries (e.g. “Perlas” terminals, grocery stores, post offices) and pay a commission for these transactions, service providers are encouraged to consider compensating such transaction fees when payment by non-digital means is not available.
6. As digital skills (or access to smart devices) are more commonly lacking among older people, offering discounts only through mobile apps could constitute indirect age discrimination. To prevent such cases of indirect age discrimination, it is recommended that discount schemes also be accessible through alternative means, such as physical discount cards.
7. Enable residents to access banking services without using digital tools. Also, provide alternatives for making appointments at bank branches other than digitally (e.g. by phone or by visiting the bank in person).

For healthcare providers

1. Ensure that registration for appointments with healthcare specialists is available not only through digital means but also via alternative methods (e.g. in person, by phone, etc.). Also ensure that these alternatives are effective in practice (e.g. that appointments are not fully booked online, leaving none for in-person registration).
2. Provide patients with the option to receive the results of medical tests or other information regarding their health status through means other than digital tools.
3. Empower healthcare professionals – especially family doctors and community nurses – to provide older individuals with clearly understandable information on how to access the “E. sveikata” portal, register for appointments, review test results and medical history, as well as how relatives can register a person for an appointment with a healthcare specialist.

4. Healthcare institutions are advised to establish and approve procedures for providing services to patients, including specifying how information about doctors offering services in languages other than Lithuanian is communicated. Information on the language of service provision could be made available during registration, both online and by phone.

For transport service providers

1. Ensure that local and intercity transport tickets can be purchased via alternatives to digital channels – for example, at kiosks, in supermarkets, other shops, or directly from drivers (as far as this complies with safety and other requirements).
2. Retain the option to pay for tickets not only by contactless methods but also in cash.
3. Ensure that people without digital skills have a real opportunity to purchase tickets for intercity routes through non-digital means. For example, limit the number of tickets available online by reserving a portion for those purchasing by alternative methods. This measure should consider the most essential travel routes for older people, such as trips to secondary or tertiary healthcare facilities.

For insurance companies

1. Provide clients with clear and accurate information on why they are required to disclose their age and health condition, and give proper justification when declining to offer an insurance proposal on the spot – especially in situations where the refusal of travel insurance may be perceived as less favourable treatment of older individuals.
2. Publish comprehensive and transparent information on the insurance company's website about how individual risk assessments are carried out when offering travel insurance proposals, specifying the reasons and clearly explaining when and why a client might be subject to an individual assessment of insurance risk.