

**LGBTIQ+ Equality Strategy 2026-2030**  
**Call for evidence**  
**Contribution by European Pride Business Network (EPBN)**

This note sets out EPBN's proposals for the priorities that the EU LGBTIQ+ Strategy 2026–2030 should adopt to advance LGBTIQ+ workplace equality in Europe

**This contribution first considers the main legislative and institutional gaps regarding the protection of LGBTIQ+ people in the workplace in professions and business that the next Strategy should take into account.**

**Main goal:** as underscored in Mario Draghi's report on the future of European competitiveness, a competitive Europe is an inclusive Europe that can make diversity an opportunity, a source of wealth and a driver of sustainable performance.

Despite progress under the LGBTIQ+ Strategy 2020–2025, recent developments on DEI (Diversity, Equity and Inclusion) fronts demonstrate the urgent need for stronger European regulations. The LGBTIQ+ Strategy 2020–2025 has indeed been a milestone in advancing rights against all forms of discrimination, but although it firmly established principles to guide the development of concrete tools, we must acknowledge that the road to fully realizing each of its four declared objectives remains very long. Moreover, it is clear that new and additional objectives must now be set in order to tackle discrimination that persists and to guarantee basic rights.

**This is why the new Strategy 2026 - 2030 must start from its original pillars:**

1. Counter discrimination against LGBTIQ+ people;
2. Ensure the safety of LGBTIQ+ people;
3. Build inclusive societies for LGBTIQ+ people;
4. Lead the fight for equality of LGBTIQ+ people around the world

**and propose new and additional ones that take into account that the full achievement of an effective condition of Diversity Equity and Inclusion is a question not only of human and civil rights but also of the full development of democracy, social justice, competitiveness and sustainable development.**

**1) Strengthening & Reinforcing Support of DEI Policies in Workplace**

Supporting the development and implementation of **Diversity, Equity, and Inclusion (DEI)** policies across workplaces, professions, and businesses to foster inclusive environments and ensuring robust enforcement and transposition into national laws, will be crucial in the next few years for the EU. Not only to ensure respect for the human, civil and social rights of LGBTIQ+ people but also to promote the well-being of organizations and businesses, help them improve their business performance and results and thus contribute to the growth of the competitiveness of the European economic system and to strengthen a healthy, long-lasting and resilient model of socially sustainable economic development.

Nearly 40–45% of LGBTIQ+ employees report discrimination in several Member States. Subtle forms of discrimination such as microaggressions pose impediments to career

advancement and personal and professional wellbeing. We are at a critical moment for inclusion in the workplace in Europe, and the European institutions must not retreat in the face of the systematic attack on these policies and the values that inspire them, brought about by the push and pressure of the Trump Administration, including against US companies operating in European markets.

The current global retreat from DEI policies presents Europe with a strategic opportunity to position itself as the destination of choice for LGBTIQ+ talent and inclusive businesses. As other jurisdictions restrict rights and workplace protections, Europe can attract highly skilled professionals and innovative companies seeking supportive regulatory environments, turning inclusion into economic competitiveness.

It's evident that inclusive and diverse workplaces are not just a moral imperative but a strategic advantage. DEI is a driver of talent attraction, productivity, competitiveness, and innovation across the continent. Many studies (ie "*How the LGBTQ+ community fares in the workplace*", Mc Kinsey study, 2023 or "*Relationship between LGBTQIA+ inclusion and local economic development*", Tortuga and EDGE study, 2024) over the years have consolidated the economic evidence of LGBTIQ+ inclusion:

- inclusive workplaces drive innovation and profitability,
- diverse and inclusive companies can see productivity gains of 20–30%,
- enhanced workplace satisfaction
- innovation contribute to stronger economic performance
- investments in equality not only boost social cohesion but also yield measurable business returns.

The success of Europe's economy depends on ensuring that every professional – regardless of gender, gender identity or expression, sexual orientation, sex characteristics, but also age, ethnicity, migration background, disability – can thrive in an inclusive and fair workplace. Europe needs strong legal frameworks, continued advocacy, and committed leadership to push inclusion forward and deeper.

- a) For all these reasons we propose that the new EU LGBTIQ+ Strategy include the **proposal of an European Directive on Diversity, Equity & Inclusion (DEID=DEI Directive)**. This DEI Directive would require Member States to transpose common minimum standards into national law and oblige employers - tailored by size and sector - to adopt, report on, and enforce DEI measures. It would also establish an EU-level monitoring mechanism for workplace inclusion.

Under this Directive, every company with more than 250 employees (and public institutions of any size) must adopt a written DEI policy covering recruitment, career progression, pay equity, anti-harassment, and clear grievance procedures. Each covered company would publish or submit to national authorities an annual DEI Growth Report that includes:

- aggregated data on the number of employees including representation at management levels;
- results of an anonymized workplace-climate survey (for example, the percentage of staff who experienced or witnessed LGBTIQ+-related microaggressions);
- the number of formal discrimination complaints and resolution outcomes (broken down into harassment, recruitment, promotion categories);

- training metrics (for instance, the percentage of staff and managers who completed DEI training modules).

The Directive would guarantee whistle-blower protection for anyone reporting discrimination based on sexual orientation or gender identity and would ask Member States to designate or create an independent oversight body (alternatively, these functions could be assigned to the national Equality Bodies) to monitor compliance, investigate complaints, and impose sanctions - such as fines or administrative measures - if employers fail to meet DEI obligations.

The DEI Directive should include targeted provisions for trans, intersex, and non-binary employees facing unique barriers: transition support policies for name/pronoun usage and healthcare leave, protection against discrimination based on medical history affecting insurance and employment, and guidelines preventing binary conformity requirements for accessing workplace benefits.

- b) The Strategy should set clear quantitative and qualitative targets and metrics for itself and for Member States and commit to produce an annual **DEI Growth Report** with clear quantitative and qualitative targets and objectives for the period 2026-2030, including for example

- 1) by 2027, at least 75% of companies with more than 250 employees in Europe or public companies and public bodies should have a fully published and up-to-date DEI policy;

- 2) by 2028, reduce the share of LGBTIQ+ employees reporting discrimination in the workplace to below 25%.

To monitor progress, the Strategy will rely on metrics as workplace climate surveys conducted by an independent EU body every two years, measuring perceived psychological safety, prevalence of microaggressions and perceived managerial support.

- c) The Strategy should promote and facilitate initiatives joining forces from all stakeholders connected to the workplace. Europe should be promoting a **major European conference dedicated to workplace inclusion** gathering all stakeholders, such as SME (Small and Medium size Enterprises), corporates, unions, chamber of commerce, local authorities, universities.

- d) The Strategy should reinforce the **collaboration with European and international entities and institutions deploying norms and standards**, such as the one suggested by International Standard Organization (norm 26000 on Corporate Social Responsibility and norm 30415 on diversity). The Strategy should be fully collaborative and supportive with the European Corporate Social Responsibility Directive (CSRD). The EU should be closely working and leading the renewal of the UN Sustainable Development Goals by 2030.

## 2) **Fighting discrimination in all its forms with a European anti-discrimination legal framework**

- a) For these reasons we underscored the urgent need for stronger legal protections to safeguard these principles. **We called on the European Commission to reconsider its decision to withdraw the Equal Treatment Directive** proposal or,

alternatively, to introduce a new proposal to close the critical gaps in European anti-discrimination law to strengthen protections against discrimination based on religion or belief, disability, age, sexual orientation and explicitly extend these to gender identity and gender expression and sex characteristics. Ensuring comprehensive and enforceable protections is essential to fostering truly inclusive workplaces and societies across Europe.

- b) **European Union should nominate a dedicated and independent Ombudsman/ Ambassador on human rights/LGBTQIA+ rights.** This will allow investigating complaints, issuing recommendations, publishing data, together with the FRA.
- c) In addition, the rapid development of artificial intelligence used by employers carries a real risk of algorithmic bias and discrimination targeting individuals on the basis of gender identity or sex characteristics in workplaces. **The EU should allocate dedicated funding for research into AI-induced discrimination in the workplace and develop regulatory safeguards,** such as mandatory bias audits and transparency requirements, with particular attention to the so-called Critical Risks foreseen by the AI Act, including AI systems used in recruitment that may discriminate against gender-diverse names or transition-related career gaps, and performance evaluation AI that penalizes non-conforming gender expressions, to ensure that emerging technologies in workplaces uphold fundamental rights rather than exacerbate existing inequalities.

### 3) Promoting Inclusive Supply Chains

It's really important to encourage initiatives at EU level, through targeted programmes supporting good practices, incentives and the definition of common guidelines, that create opportunities to integrate LGBTIQ-owned businesses into supply chains, thus fostering innovation and supporting the growth of resilient and diverse supply networks. **Supplier diversity is a key factor of success for both stakeholder: the customer and the supplier.** It helps enable minority-owned businesses to access some markets and to break the glass-ceiling, so that they can develop and be an active part of the competitiveness and the sustainability of European growth.

### 4) Providing funding for programs and interventions of civil society organizations

The Citizens Equality Rights Values (CERV) programme has been crucial in funding equality initiatives, with over €1 billion so far supporting civil society organisations, many of which are working on inclusion. EPBN also relies on CERV to implement its impactful European projects for workplace inclusion.

This is why, in the context of an unfavourable economic situation and with huge priorities to address, **the CERV Programme must not be defunded in the next Multiannual Financial Framework (MFF) but instead confirmed and expanded.** The expansion and strengthening of CERV will ensure continued support for international NGOs and civil society organisations, enabling them to scale up their efforts and drive systemic change. A stronger CERV Programme means greater collaboration, better resources and long-term progress in workplace equality across Europe. Joint forces of civil society and the European Commission is a must have. Civil societies are at the heart of the issues faced by the population.

More generally, the Strategy must indicate clear solutions to strengthen the general framework for the protection of LGBTIQ+ people in each Member State, fight against discrimination and remove obstacles that prevent the enjoyment of the same rights for LGBTIQ+ people in each Member State.

#### **5) Ensuring effective implementation of the Equality Bodies Directive 2024/1499.**

Member states shall bring into force the laws, regulations and administrative provisions necessary to comply with this directive by June 19, 2026. Only an effective and ambitious national implementation in every Member State of this Directive on Standards for Equality Bodies can lead to Equality Bodies that have stronger guarantees for their independence and the necessary resources to promote equality, fight discrimination effectively, and ensure accessibility to all.

In order to ensure that the full and proper implementation of the directives into national law is prioritized by legislators, policymakers, and governments, it is necessary for the European Union to stimulate strong and sustained involvement by national governments of civil society and NGOs, and civil society organizations working with people exposed to discrimination, for comprehensive and effective transposition and implementation.

#### **6) Banning conversion practices**

The need to introduce measures to ban conversion practices has become even more urgent after the European Citizens' Initiative, which ended on 17 May, has gathered more than 1.200.000 signatures, inviting the European Commission to propose a legally binding ban on conversion practices directed at LGBTIQ+ citizens in the European Union and/or to publish EC structured guidance for Member States on ending conversion practices, including via supporting the development and implementation of national bans, as well as training and exchange of good practices.

EU-level prohibition must address all coercive identity change: non-consensual medical interventions on intersex children, psychiatric gatekeeping forcing stereotypical gender presentations for healthcare access, and workplace practices coercing suppression of sexual orientation, gender identity, or expression.

#### **7) Preventing discrimination related to the development and use of Artificial Intelligence and Machine Learning systems**

Artificial intelligence is increasingly shaping modern workplaces, its impact on employment, decision-making and prejudice must be carefully managed. The European Union is the first place in the world where a clear response has been given. But now it is necessary that in the implementation phase of the provisions of the AI Act, especially those on Critical Risks, we continue to emphasize that AI-based processes must be impartial, ethical and inclusive and that every LGBTIQ+ citizen who may complain of a discriminatory injury against them can clearly assert the respect of their rights.

#### **8) Preventing direct attacks on LGBTIQ+ people by Member States**

The recent ban of Budapest Pride by Hungarian authorities represents a serious regression in fundamental rights protection. Beyond undermining freedom of assembly, such acts contribute to a normalisation of institutionalised homophobia and embolden hate speech across the region. Tolerating or legitimising discriminatory state actions weakens the Union's credibility and exposes LGBTIQ+ citizens to increased marginalisation and violence. Civil

society organisations have consistently highlighted the inadequacy of current responses and the chilling effect of unchecked hate speech on democratic participation.

European Union can establish a clear policy and provide citizens and Civil Society Organizations with clear information on the activation of Article 7 of the Treaty on European Union on the suspension of membership rights to the European Union for countries that seriously and persistently violate the principles on which the EU is founded, as defined in Article 2 of the Treaty (respect for human dignity, freedom, democracy, equality, the rule of law and respect for fundamental rights, including the rights of persons belonging to minorities).

#### **9) Monitoring enlargement processes**

**The European Commission should continue to include LGBTIQ+ sections in its annual reports on the enlargement countries**, and those working on these countries should step up their efforts, via dialogue with their respective partners, to ensure that legislative and policy changes granting equal access to rights for LGBTIQ+ people are properly implemented, so that LGBTIQ+ people can experience the real, tangible effect of the enlargement process on the improvement of their rights.

#### **10) Ensuring freedom of movement & family rights**

Protecting the rights of LGBTIQ+ individuals and families across the EU, ensuring recognition and equal treatment in all member states, **adopting of the EC draft Regulation on parenthood recognition and proposing legislation that ensures and promotes freedom of movement for all LGBTIQ+ people and their families**. Europe should leverage this progressive framework to attract global LGBTIQ+ talent and support businesses seeking inclusive jurisdictions, while establishing workplace policies recognizing modern family structures.

#### **11) Supporting LGBTIQ+ Inclusive Education**

Inclusion at work and in society starts in the classroom. To build a diverse, innovation-ready workforce, inclusion must be embedded early, not as a privilege, but as the norm. Education is Europe's best investment in future competitiveness. **Europe should establish age-appropriate inclusion standards with educator training, protect educational freedom from political interference, and support education-workplace partnerships** that prepare diverse, innovation-ready talent for inclusive professional environments.

#### **12) Combating intersectional discrimination**

Implementing data-driven policies to address discrimination that disproportionately affects individuals facing multiple layers of marginalization.

#### **13) Countering hate speech & misinformation**

Taking decisive action to curb the spread of anti-LGBTIQ+ rhetoric, misinformation, and online hate speech.

Europe has an urgent need for **reinforced action to address the rise of hate speech targeting LGBTIQ+ individuals across Member States**. Recent data from the European Union Agency for Fundamental Rights (FRA) indicate that over 60% of LGBTIQ+ respondents have encountered online or offline hate speech, with transgender and non-binary persons facing disproportionate levels of hostility. In response, this proposal

advocates for the inclusion of hate speech based on sexual orientation, gender identity, gender expression, and sex characteristics among the categories recognised under EU criminal law (Art. 83 Treaty on the functioning of the European Union TFEU).

Key measures include:

- Harmonisation of definitions and penalties related to anti-LGBTIQ+ hate speech;
- Mandatory reporting and removal protocols for online platforms, in coordination with the Digital Services Act;
- Targeted training for law enforcement and judicial bodies to enhance detection, prosecution, and victim support;
- The creation of an European Observatory on LGBTIQ+ Hate Speech to centralise data, share best practices, and support cross-border investigations;
- Conditionality of EU funding for Member States based on measurable progress in combating hate speech and safeguarding freedom of assembly and expression for LGBTIQ+ communities.

#### **14) Collecting data, monitoring & safeguarding well-being**

Enhancing data collection and reporting on discrimination while ensuring the protection, health, and well-being of LGBTIQ+ individuals, particularly those undergoing gender transition.

#### **Conclusions:**

At EPBN, we remain committed to advocating for a more equal, diverse, and inclusive Europe, being moderate and pragmatic – and we invite businesses, institutions, and leaders to join us in this mission. Our goal is combating and preventing discrimination of LGBTIQ+ people at work and promoting LGBTIQ+ equality at the workplace and in society.

EPBN Members:

- AG PRO (Austria)
- Queer BusinessWomen (Austria)
- Pride Biz Austria (Austria)
- Cavarria (Belgium)
- Glas Foundation (Bulgaria)
- Common Zone (Croatia)
- Pride Business Forum (Czechia)
- Copenhagen Pride (Denmark)
- L' Autre Cercle (France)
- Völklinger Kreis (Germany)
- Wirtschaftsweiber (Germany)
- We are Open (Hungary)
- EDGE (Italy)
- Lithuanian Gay League (Lithuania)
- Blom (Luxembourg)
- Federacja Znaki Równości (Poland)
- Legebitra (Slovenia)
- REDI (Spain)
- Network (Switzerland)
- WyberNet (Switzerland)

- WorkPlace Pride (The Netherlands)
- Fulcrum (Ukraine)

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### **Who We Are**

**European Pride Business Network (EPBN)** is an umbrella organisation for 22 associated members across 19 European countries (15 EU, plus Ukraine, Switzerland, Liechtenstein and San Marino) committed to advancing LGBTIQ+ workplace inclusion.

Our mission is to foster inclusive policies, equal opportunities, and safe work environments for LGBTIQ+ professionals across Europe.

### **Our Achievements**

- **Business & Human Rights Advocacy** – Engaging with EU institutions to strengthen workplace protections, since 2023
- **Council of Europe Observer Status** – EPBN actively contributes to shaping European LGBTIQ+ policies
- **Successful ongoing implementation of CERV-backed Project WISE** (Workplace Inclusion for a Sustainable Europe)

For more information, please contact Lucia Urcioli, Vice Chair of EPBN [lucia@epbn.eu](mailto:lucia@epbn.eu)