



Human Rights Council
Working Group on the Universal Periodic Review
Thirty-fifth session
20–31 January 2020

Summary of Stakeholders' submissions on Spain*

Report of the Office of the United Nations High Commissioner for Human Rights

I. Background

1. The present report was prepared pursuant to Human Rights Council resolutions 5/1 and 16/21, taking into consideration the periodicity of the universal periodic review. It is a summary of 89 stakeholders' submissions¹ to the universal periodic review, presented in a summarized manner owing to word-limit constraints. A separate section is provided for the contribution by the national human rights institution that is accredited in full compliance with the Paris Principles.

II. Information provided by the national human rights institution accredited in full compliance with the Paris Principles

2. The Ombudsman expressed concern about the insufficient action taken to implement the recommendations accepted by Spain during its second universal periodic review. It expressed regret about various issues, including: the few convictions secured against public officials for offences of torture or ill-treatment, owing to the difficulty of investigating cases identified and proving allegations; the situation of women deprived of their liberty; the lack of investigation and absence of effective remedies for granting reparation to victims of terrorism; the failure to disseminate sufficient information about the Social Fund for Housing and the Code of Good Practice; the difficulties that impede access to health and education services for persons living in sparsely populated areas; and the deficiencies in the humanitarian admission process for persons in an irregular situation who cannot be repatriated, and in the way in which the admission of asylum seekers is managed, including the unacceptable lack of legal aid.²

3. The Ombudsman recommended: using arbitration and mediation as an alternative dispute resolution mechanism in order to improve the administration of justice; developing a statistical database of information on trafficking in persons and improving victim identification procedures; ensuring that all public authorities respect the principle of

* The present document was not edited before being sent to United Nations translation services.



ideological neutrality that typifies a pluralistic, democratic and tolerant society; providing information and advice to young persons at risk of dropping out of education prematurely, and to the groups most at risk of social exclusion; increasing the number of health-care professionals; adapting the social welfare system to recognize the rights of older persons; creating more social housing; enhancing the specialized training provided for staff involved in ensuring comprehensive protection for victims of violence against women, and improving coordination between the various public authorities involved; eliminating the gender pay gap and increasing the political representation of women; strengthening efforts to combat discrimination, eliminate stereotypes and achieve effective equality for Gypsies; adopting an organic law to protect the rights of persons with disabilities, and standardizing criteria and providing guidelines for involuntary committals; ending the educational segregation of Gypsy children and ensuring their integration; and improving coordination between the various State agencies with a view to establishing a migration policy that takes a holistic approach to the issue.³

III. Information provided by other stakeholders

A. Scope of international obligations⁴ and cooperation with international human rights mechanisms and bodies⁵

4. Just Atonement Inc (JHA) and Caritas recommended ratifying the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families.⁶

5. The International Campaign to Abolish Nuclear Weapons (ICAN) recommended ratifying the UN Treaty on the Prohibition of Nuclear Weapons.⁷

6. Associació Catalana Pels Drets Civils (ACDC) recommended agreeing to visits from special procedures mandate holders who so request and allowing them freedom of action.⁸

B. National human rights framework⁹

7. Joint Submission 4 (JS4) recommended according constitutional status to economic, social and cultural rights so that they may be invoked before judges and courts of relevant jurisdiction.¹⁰

8. Caritas regretted that Spain had still not created an inter-ministerial follow-up mechanism and that application of the views of treaty bodies is limited.¹¹

C. Implementation of international human rights obligations, taking into account applicable international humanitarian law

1. Cross-cutting issues

Equality and non-discrimination¹²

9. Fundación Secretariado Gitano (FSG) welcomed the action plan to combat hate crime (2019).¹³ JS4 noted, however, that migrants, refugees, Gypsies, persons with disabilities, members of the LGTBI community and homeless persons continue to be discriminated against in the exercise of their rights, particularly in employment, housing, health and education.¹⁴

10. JA1 and Joint Submission 24 (JS24) recommended taking measures to curb hate speech, xenophobia and racial discrimination.¹⁵ FSG, JS4 and Joint Submission 15 (JS15) recommended adopting the Comprehensive Act on Equal Treatment and Combating Discrimination.¹⁶ Association Actuvallès recommended approving the LGBTI Equality Act and the Trans Act.¹⁷

11. SOS Racisme Catalunya (SOS) and FSG regretted that ethnic profiling remains a habitual police practice.¹⁸ SOS recommended providing police officers with training on racism and xenophobia¹⁹ and establishing complaints mechanisms for members of the general public.²⁰

12. Asamblea por una Escuela Bilingüe de Cataluña (AEB) expressed concern that the education system in Catalonia does not accord the same language rights to Spanish speakers.²¹ AEB and Catalunya Somos Todos. Tots Som Espanya (CST) recommended guaranteeing bilingual education in Catalonia.²²

13. European Language Equality Network (ELEN) indicated that Catalan speakers experienced discrimination, including by authorities of Spanish-speaking regions, leaders of political parties and media outlets.²³

14. The Council of Europe (CoE) noted that the European Charter for Regional or Minority Languages highlighted that minority languages were recognized as an expression of cultural wealth, and the adoption of special measures in favour of regional or minority languages aimed at promoting equality between the users of these languages and the rest of the population was not considered to be an act of discrimination against the users of the more widely-used languages. COE commended the Catalan Government's commitment to a multilingual education project.²⁴ Joint Submission 14 (JS14) recommended carrying out information campaigns on language rights.²⁵

15. ELEN recommended ensuring that an adequate proportion of the judicial, administrative and public service staff posted in the autonomous communities has a working knowledge of the relevant languages.²⁶ JS14 recommended effective enforcement of the Common Administrative Procedure Act and guaranteeing the rights of minority linguistic groups.²⁷

Development, the environment, and business and human rights²⁸

16. According to Joint Submission 6 (JS6), there have been irregularities in the implementation of the Castor gas project²⁹ that have affected people's rights to education and health.³⁰ Joint Submission 35 (JS35) recommended ensuring that the legislation governing environmental projects is in line with international standards, including the principle of non-discrimination.³¹

17. JS4 recommended reinforcing the regulatory framework that guarantees corporate legal accountability.³² Global Unions (ITF) recommended adopting proactive measures with a view to increasing the number of enterprises that adopt equality plans.³³

18. The Center for Global Nonkilling (CGNK) recommended enforcing environmental rights, by providing adequate supervision and restoration of critical facilities, including abandoned mine tailings dams.³⁴

19. JS6 recommended conducting an assessment of energy policy and promoting a participatory model based on renewable energy.³⁵

20. Síndic de Greuges de Catalunya (the Catalan Ombudsman) noted that pollution continues to affect the most densely populated areas in particular. It recommended adopting measures that help to reduce pollution and promoting a sustainable transport and mobility policy.³⁶

Human rights and counter-terrorism³⁷

21. Various stakeholders recalled that, according to human rights mechanisms, the overbroad definitions of terrorism-related offences, entailed in the Basic Law 4/2015, could pave the way for a disproportionate or discretionary enforcement of the law by authorities, an issue which has not been addressed by Spain.³⁸ They noted that its extensive application has resulted in the criminalisation of human rights defenders, the outlawing of associations and political organizations, the prohibition of public events, the conviction of journalists, artists and musicians as well as the closing of media outlets for terrorism-related offenses.³⁹

22. Several stakeholders recommended ensuring that the legislation on terrorism is precise, complies with international standards and is not misused to limit the legitimate work of HRDs and journalists.⁴⁰

2. Civil and political rights

*Right to life, liberty and security of person*⁴¹

23. Joint Submission 41 (JS41) expressed concern that the security forces continue to use disproportionate force during demonstrations, engaging in ill-treatment and causing personal injury, as they do not have adequate guidelines for action.⁴²

24. JS41 recommended ensuring effective and independent investigations in cases of police misconduct, with those found guilty receiving punishments commensurate with the gravity of the offence;⁴³ creating a parliamentary commission to look into ways to prevent institutional violence;⁴⁴ and providing human rights training for members of the security forces and the judiciary.⁴⁵

25. Several stakeholders recommended taking measures to eliminate police violence, including increasing training for the police on the Basic Principles on the Use of Force and Firearms by Law Enforcement Officials, to ensure appropriate responses to civilian protests.⁴⁶

26. Several organizations expressed regret that, on 1 October 2017, the date on which the referendum was held in Catalonia, the National Police and Civil Guard used excessive and disproportionate force against citizens who had gathered peacefully in various locations in Catalonia.⁴⁷ They indicated that, in many cases, riot police ploughed directly into the crowd, without first trying to negotiate an alternative solution with them.⁴⁸ A number of organizations stated that, as a result, the various hospitals treated almost a thousand people for injuries caused by police assaults.⁴⁹ Associació d'Afectats (Afectats) indicated that the violent police action also caused numerous anxiety and panic attacks among victims, members of their families and people living nearby.⁵⁰

27. A number of organizations noted that no commission of inquiry had been established to look into the possible accountability of the police officers who took part in the operations and that the perpetrators had not been punished.⁵¹ Associació Juristes Pels Drets Humans del Maresme (HHRR) welcomed the fact that criminal proceedings in respect of the events of October 2017 had been brought before the courts, but regretted the slow pace at which they were progressing⁵² and the failure to take the action necessary to identify the perpetrators.⁵³ Several organizations recommended carrying out independent and impartial investigations into the excessive force used by security forces in October 2017 in Catalonia, establishing the corresponding criminal responsibilities and setting up a commission of inquiry.⁵⁴ Afectats recommended that guarantees of non-repetition should be provided.⁵⁵

28. Fair Trials (FT) noted that recommendations accepted by Spain during its second universal periodic review regarding pretrial detention have not been adequately implemented.⁵⁶ Joint Submission 5 (JS5) recalled that human rights mechanisms had expressed concern about the persistent use of special observation (FEIS system) in prisons.⁵⁷ Human Rights Without Frontiers (HRWF) regretted that the FIES system of special observation had been misused, resulting in unfair conditions of detention and prolonged periods of pretrial detention.⁵⁸

29. A number of organizations regretted that the social leaders Jordi Sánchez and Jordi Cuixart had been held in pretrial detention since 2017, on criminal charges of rebellion and sedition, even though several special procedures mandate holders had expressed concern and called for their release.⁵⁹

30. A number of organizations recommended implementing the measures recommended by the Working Group on Arbitrary Detention and other United Nations mechanisms and immediately releasing all persons detained in relation to the Catalan referendum.⁶⁰ IC recommended ensuring that citizens can only be detained for acts that constitute criminal offences, and not for purposes of intimidation.⁶¹

31. Several stakeholders recommended establishing clear and exceptional legal criteria for applying pretrial detention;⁶² providing for more alternative measures, and ensuring their use in practice;⁶³ ceasing using the FIES classification for non-dangerous cases; abolishing *secreto de sumario*;⁶⁴ and investigating all cases of torture and ill-treatment in conformity with the international standards.⁶⁵ It was also recommended that protocols for ensuring that the presumption of innocence is maintained for pretrial detainees should be drafted and implemented.⁶⁶

*Administration of justice, including impunity, and the rule of law*⁶⁷

32. ACDC and Joint Submission 18 (JS18) expressed concern about the functioning of the Judiciary. They recommended guaranteeing the independence, impartiality and transparency of the Judiciary, including: conducting an assessment of the legislative framework governing the Consejo General del Poder Judicial; and adopting legal objective criteria and evaluation requirements for the appointment of the highest judiciary ranks, as well as a code of conduct.⁶⁸

33. CoE noted that the Group of States against Corruption (GRECO) recommended undertaking reforms against corruption.⁶⁹ Transparency International Spain (TAR) recommended developing a plan for preventing and reducing corruption, in accordance with international standards.⁷⁰

34. TIE recommended that Spain should increase the number of judges and prosecutors, including on the staff of the Office of the Special Prosecutor against Corruption and Organized Crime.⁷¹

35. CGNK and Egiari Zor Fundazioa (EZF) were concerned about the persistent lack of support from the authorities to identify the truth regarding the grave human rights violations, which occurred during the Civil War and the dictatorship.⁷² EZF singled out Act No. 46/1977 (the Amnesty Act) and the Official Secrets Act of 1968, both of which are still in force, as causes of impunity.⁷³

36. CGNK recommended that Spain fully engage in the location of all remaining mass burial sites and graves associated with enforced disappearances and killings that took place during the Civil War and the dictatorship, providing historical reparation to the families of victims; promoting historical remembrance⁷⁴ and facilitating access to relevant historical information held in State archives.⁷⁵

*Fundamental freedoms and the right to participate in public and political life*⁷⁶

37. Several stakeholders recalled that, during its second universal periodic review, Spain accepted recommendations to guarantee freedoms of expression and peaceful assembly. However, the Public Security Act (“gag law”) significantly restricted those rights, in particular in the frame of peaceful protest.⁷⁷ According to these stakeholders, the language used in the gag law is ambiguous and creates a risk of arbitrary interpretation.⁷⁸ The law also granted to the authorities broad discretion to decide on the dissolution of a meeting or a peaceful demonstration. In parallel, the reformed Penal Code introduced the vaguely defined concept of “large gathering” as an aggravating factor of a crime.⁷⁹ Its application affected the work of HRDs to monitor human rights violations during protests.⁸⁰ In addition, according to the same organizations, the penalties envisaged therein are severe,⁸¹ and since the amendments were enacted, there has been an increase in police abuse.⁸²

38. Various stakeholders also indicated that the gag law had been used against journalists, who had been accused of “*resistencia a la autoridad*” and “*desobediencia*”,⁸³ after having reported on police actions taken in the context of protests; and also against artists⁸⁴ and asylum seekers.⁸⁵

39. In line with the recommendations accepted by Spain during its second universal periodic review, several stakeholders recommended ensuring the full enjoyment of the rights to freedom of expression and peaceful assembly, in conformity with international standards, including by reviewing/repealing legislation which disproportionately/unduly restrict the exercise of these rights, particularly the Public Security Act (gag law), and Basic

Laws 1/2015, which mainly revises the penalties regime and its application and 2/2015 relating to crimes of terrorism.⁸⁶

40. Various stakeholders also recommended that Spain ensure the investigation and prosecution of perpetrators of police violence and abuses against demonstrators;⁸⁷ and ensuring that journalists,⁸⁸ artists and cultural workers can perform their job without undue interference.⁸⁹

41. Catalan Associació Professionals (ACP) and JS31 expressed concern about unwarranted restrictions on freedom of expression and association, principally in the context of the October 2017 referendum, including the digital repression that led to the closure and blockage of many newspaper websites.⁹⁰ ACP recommended amending the Intellectual Property Act so that a court order is required for the closure of websites.⁹¹ Joint Submission 10 (JS10) recommended amending Act No. 19/201 in order to recognize the right of access to information as a fundamental right.⁹² JS31 recommended upholding the freedom of the media by removing restrictions placed on the media when it comes to reporting on issues related to the pro-independence movement in Catalonia.⁹³

42. JS10 recommended decriminalizing defamation.⁹⁴

43. CST recommended that the Catalan Government should take steps to ensure that all citizens of Catalonia, irrespective of their beliefs and opinions, feel that they are represented.⁹⁵

44. Front Line Defenders (FLD) expressed concerns about reports on restrictions imposed on HRDs that monitor internment centres for foreigners.⁹⁶ FLD reported that HRDs faced smear campaigns and defamation, as well as harassment and threats from law enforcement authorities in reprisal for denouncing violations allegedly committed by the police.⁹⁷ FLD recommended that Spain guarantee that HRDs are able to carry out their activities without fear of reprisals and ensure full respect for the UN Declaration on Human Rights Defenders.⁹⁸

45. Consejo de la Juventud de España (CJE) noted that young persons encountered obstacles to political participation.⁹⁹ It recommended taking affirmative action to ensure that they are able to exercise their right to political participation effectively and on an equal footing with others.¹⁰⁰

46. El Observatorio para la Libertad Religiosa y de Conciencia (OLRC)¹⁰¹ and Joint Submission 16 (JS16) recommended that Spain should ensure freedom of religion¹⁰² and foster an environment of religious harmony and cooperation, without discrimination.¹⁰³

*Prohibition of all forms of slavery*¹⁰⁴

47. UNICEF recommended adopting a comprehensive law that encompasses all forms of trafficking and servitude.¹⁰⁵ Caritas recommended developing comprehensive plans to combat human trafficking and forced labour.¹⁰⁶ JS27 recommended that the law should include specifically address cases involving minors.¹⁰⁷

48. CoE noted that the Council of Europe Convention on Action against Trafficking in Human Beings (GRETA) recommended adopting a national action plan aimed at combatting trafficking in human beings for the purpose of labour exploitation and improving the identification of, and assistance to, victims of trafficking.¹⁰⁸

*Right to privacy and family life*¹⁰⁹

49. EE noted that placing persons deprived of their liberty in prisons located some distance from the area in which their relatives lived added to their suffering and created a considerable financial burden for their families, owing to the weekly journeys they were forced to make to visit their imprisoned relative.¹¹⁰ The difficulties that family members faced were sometimes insurmountable, compromising their right to family life.¹¹¹

3. Economic, social and cultural rights

*Right to work and to just and favourable conditions of work*¹¹²

50. JS4 noted that the unemployment rate remained alarmingly high.¹¹³ CJE regretted that State budgets for fighting unemployment had been cut.¹¹⁴ Fundación Cermi women (MCF) recommended developing strategies for combatting precarious employment.¹¹⁵

51. Consell Nacional de la Joventut de Catalunya (CNJC) noted that young persons had difficulty gaining access to employment: a third of them were at risk of poverty and social exclusion; nearly half were working on short-term contracts; and a fourth were unemployed. CJE recommended implementing public policies designed to combat youth unemployment and precarious conditions of work.¹¹⁶ JS4 recommended establishing monitoring mechanisms, increasing training opportunities and implementing the Youth Guarantee system more effectively.¹¹⁷

52. Joint Submission 23 (JS23) noted that Organic Act No. 4/2015 and the amendments to the Criminal Code made it difficult to exercise the right to strike, and that a large number of trade unionists either had recently been tried or were currently awaiting trial for having exercised this right. They recommended that the legal provisions in question should be repealed.¹¹⁸

*Right to an adequate standard of living*¹¹⁹

53. JS4 expressed concern about the continuing austerity measures that had been adopted in response to the economic and financial crises but did not guarantee the protection of various human rights.¹²⁰

54. JS4 expressed regret that access to housing was at crisis levels owing to the reduction in household income and the increased cost of renting or buying a home,¹²¹ and drew attention to the considerable regional disparities.¹²² CNJC noted that access was particularly difficult for young people.¹²³

55. JS4 recommended developing a strategic plan to ensure effective access to housing that included legislative amendments¹²⁴ and measures to reduce regional disparities.¹²⁵ CJE recommended fostering and facilitating the creation of public housing stock and improving information and advice systems.¹²⁶

56. Caritas recommended adopting a protocol for action to protect persons and families in vulnerable situations in cases of eviction that ensures due coordination between the courts and local social services;¹²⁷ and awarding compensation to the persons affected.¹²⁸

57. FSG welcomed the adoption of the 2019–2023 National Strategy to Prevent and Combat Poverty and Social Exclusion.¹²⁹ UNICEF, FSG and JS15 welcomed the establishment of the position of High Commissioner for the Fight against Child Poverty.¹³⁰ JS4 and JS7 expressed regret about the high levels of child poverty.¹³¹ JS4 recommended increasing child benefits and addressing the particular vulnerability of single-parent families.¹³² FSG recommended according particular attention to Gypsy children when designing measures to address child poverty.¹³³

*Right to health*¹³⁴

58. JS15 welcomed the adoption of Royal Legislative Decree No. 7/2018 on the right to health and universal health care.¹³⁵

59. Joint Submission 33 (JS33) recommended guaranteeing universal health coverage for all women, including migrant women, and providing safe contraception services.¹³⁶

60. JS33 recommended implementing sexual and reproductive health prevention and treatment programmes that were adequately funded in all autonomous communities.¹³⁷

61. JS33 recommended incorporating sex education into the school curriculum from a human-rights perspective.¹³⁸

62. Joint Submission 8 (JS8) welcomed the introduction of legislative measures and policies to reduce smoking. However, it expressed concern about the persistently high

number of smoking-related deaths and the damaging health consequences of smoking.¹³⁹ JS8 noted that the prevalence of smoking among women had not fallen to the same extent as among men.¹⁴⁰ JS8 recommended incorporating a gender perspective into smoking control programmes, creating a fund to combat smoking and mobilizing resources for the design of prevention campaigns.¹⁴¹

*Right to education*¹⁴²

63. JS4 noted that the reduction in public expenditure on education and the unequal manner in which the cuts were applied to individual budget lines had had a negative impact on universal access to education and educational quality.¹⁴³ Joint Submission 7 (JS7) recommended assessing the negative effects of the austerity measures in the area of education, especially for vulnerable groups.¹⁴⁴

64. JS4 found the high rate of school dropout regrettable and noted that the education system lacked a focus on equality.¹⁴⁵ It also noted that more than a third of families with dependent children had problems covering the costs of formal education.¹⁴⁶

65. Several organizations recommended increasing public expenditure on education to bring it into line with the average for countries belonging to the Organization for Economic Cooperation and Development and fostering public policies that promote equality and inclusion.¹⁴⁷

66. The Catalan Ombudsman welcomed the signature of the Pact against School Segregation¹⁴⁸ and recommended ensuring that all schools within a same area have a similar sociodemographic profile.¹⁴⁹

4. Rights of specific persons or groups

*Women*¹⁵⁰

67. JS7 expressed concern about the fact that women continued to fall victim to violence and homicide at the hands of their partner or ex-partner.¹⁵¹ Fundació de Dones (SURT) regretted that the coordination necessary to implement existing measures to protect women victims of discrimination and violence was lacking.¹⁵²

68. JS15 recommended amending the Criminal Code so that it encompassed all forms of gender-based violence, in line with the Istanbul Convention and with the recommendations of the Committee on the Elimination of Discrimination against Women.¹⁵³ JAI recommended allocating sufficient resources for the prosecution of domestic violence and increasing training for law enforcement and court officials.¹⁵⁴

69. JS7 noted that the lack of career development opportunities for women exposed them to financial insecurity and inequality in political participation.¹⁵⁵ JS15 welcomed the fact that Organic Act No. 3/2007 would help to ensure better conditions of labour market access for women in situations of social exclusion.¹⁵⁶ JS4 expressed concern about the discrimination that women suffered in terms of wages.¹⁵⁷ It recommended reducing and progressively eliminating the gender pay gap.¹⁵⁸ The Women of the World Platform (WoW) expressed concern about “maternal mobbing” and the difficulty of proving cases reported.¹⁵⁹ Asociación de Familias Numerosas de Madrid (AFNM) recommended offering incentives for post-maternity labour reinsertion to private companies.¹⁶⁰

70. JAI recommended continuing efforts towards achieving gender equality, including assessing the effectiveness of the 2014–2016 Strategic Plan on Equality of Opportunity.¹⁶¹ Consell Nacional de Dones de Catalunya (CNDC) recommended that Spain should invest in an integrated public infrastructure that serves as a platform for the empowerment of women and that it should consider establishing a special ombudsperson’s office for women.¹⁶²

71. CNDC recommended establishing a system of quotas for corporate management bodies and ensuring effective parity on the decision-making bodies of public authorities.¹⁶³

72. FCM recommended adopting temporary special measures to help women and girls facing multiple and intersecting forms of discrimination.¹⁶⁴

73. SURT welcomed the adoption of Royal Decree No. 6/2019, on effective equality between women and men, in 2018.¹⁶⁵

*Children*¹⁶⁶

74. Joint submission 29 (JS29) welcomed the legislative amendments made in 2015 to better protect children against violence.¹⁶⁷ CoE noted that the Lanzarote Convention recommended reviewing and modifying legislation with a view to protecting children against sexual exploitation.¹⁶⁸

75. JS27 and JS29 regretted the lack of specialized care centres for child and adolescent victims of sexual exploitation and recommended that Spain should establish a special prosecutor's office to handle cases of violence against children and adolescents and should continue to run prevention and awareness-raising campaigns on this issue.¹⁶⁹ JS29 recommended that specialized trial courts should be established to hear cases of violence against children and that victim support offices should have sufficient resources and protocols and should keep disaggregated statistics.¹⁷⁰ JS15 recommended that Spain should strengthen the capacity of the Ombudsman's Office so that it could respond to complaints from children in an appropriate manner.¹⁷¹

76. JS29 recommended ensuring that schools have guidelines for identifying and managing cases of violence against children, including cases of sexual abuse.¹⁷²

77. JS27 recommended raising the minimum age of marriage to 18 years.¹⁷³

*Persons with disabilities*¹⁷⁴

78. CoE noted that the Commissioner for Human Rights of the Council of Europe and certain other organizations welcomed the amendments made to Organic Act No. 2/2018 to recognize the right to vote of persons with disabilities, as recommended in the second universal periodic review.¹⁷⁵

79. Joint Submission 12 (JS12) welcomed the fact that the situation of women diagnosed with mental disorders was addressed in the National Strategy for the Eradication of Violence against Women. However, they were concerned that this had not been reflected in practice.¹⁷⁶

80. FCM expressed regret that several recommendations accepted by Spain during its second universal periodic view had not been fully implemented.¹⁷⁷ It noted, for example, that legislation was not sufficient to guarantee the right to sexual and reproductive health for women and girls with disabilities.¹⁷⁸ JS12 recommended repealing article 156 of Organic Act No. 10/1995, which allows forced sterilization, incorporating a gender perspective in mental health services and developing a strategy for preventing and identifying cases of gender-based violence in all mental health-care services.¹⁷⁹

81. JS7 recommended improving fittings and equipment in educational institutions in order to create equal conditions for persons with disabilities, especially children.¹⁸⁰

82. Comité Español de Representantes de Personas con Discapacidad (CERMI) recommended that Spain should incorporate a disability perspective into its national poverty reduction strategy, including specific budget lines.¹⁸¹

*Minorities*¹⁸²

83. FSG noted that Gypsies complained of being constantly, disproportionately and unfairly profiled by officers of the different police forces.¹⁸³

84. FSG also noted that a number of cases of labour discrimination against Gypsies had been documented in recent years¹⁸⁴ and that a high percentage of Gypsies were at risk of poverty. FSG recommended improving and providing adequate funding for the 2012–2020 National Strategy for the Inclusion of the Gypsy Population in Spain.¹⁸⁵

85. FSG noted that academic failure and school dropout were particularly prevalent among Gypsy girls and teenagers. It recommended creating conditions favourable to their remaining in the education system¹⁸⁶ and, given the double discrimination they face,

adopting affirmative action measures to guarantee equal opportunities and foster their social, personal and professional development.¹⁸⁷

86. CoE noted that the Advisory Committee for the Protection of National Minorities Convention affirmed that Spain had remained active in promoting the equality of Roma people. However, these efforts have been disproportionately affected by budget cuts, hence more efforts are needed to preserve, promote and accept Roma culture as an integral part of Spanish culture.¹⁸⁸

87. FSG recommended including the history and culture of the Gypsy people in school curricula.¹⁸⁹

*Migrants, refugees and asylum seekers*¹⁹⁰

88. While acknowledging the significant challenges that Spain faced in asylum-related matters, several organizations expressed regret about the country's failure to adequately implement the recommendations made in the second universal periodic review and those of other international mechanisms, which reiterated their concern about the situation of persons who reach the country's southern border. They expressed particular concern about the practice of summary and/or mass returns, especially in Ceuta and Melilla.¹⁹¹ Joint Submission 17 (JS17) was concerned that such returns had taken place outside of any formal procedure and without any assessment of individual situations, leaving the persons concerned in a situation of defencelessness.¹⁹²

89. Several organizations recommended repealing the legal provisions that allow officers to refuse entry at the border and ensuring compliance with the principle of non-refoulement by applying the legal framework established in the Aliens Act and upholding safeguards of due process in return proceedings, especially in Ceuta and Melilla.¹⁹³

90. CoE stated that Spain should uphold its human rights obligations, by establishing adequate safeguards for the right of every person to seek and enjoy asylum, irrespective of the way they reach Spanish territory.¹⁹⁴

91. JS22 was concerned that the temporary holding centres for migrants located in Ceuta and Melilla did not comply with the requirements set in relevant legislation. In addition, it noted that persons who managed to gain access to the migrant reception system encountered ineffective and inflexible procedures that were not in line with international human rights standards.¹⁹⁵ JS22 recommended allocating resources to improve facilities and conditions of stay for asylum seekers and ensuring that they receive information, legal aid and good-quality interpretation services.¹⁹⁶

92. JS15 and JS22 also regretted that time frames for the issue of asylum applicant cards were not respected, leaving asylum seekers unable to gain access to medical care, education and other entitlements.¹⁹⁷ Several organizations expressed particular concern about the situation of children, especially the fact that original documents brought from their countries of origin were not accepted as genuine,¹⁹⁸ leading to expulsion on the basis of unreliable medical evidence.¹⁹⁹

93. Joint submission 40 (JS40) expressed concern that many children under guardianship and/or in custody recounted having been held in isolation or in overcrowded conditions and having been subjected to ill-treatment by the staff of the protection centres in which they are housed.²⁰⁰ JS40 recommended establishing complaints mechanisms accessible to children so that they can report any incidents of violence meted out by the staff of first-line reception centres.²⁰¹

94. Several organizations recommended adopting a special strategy and guidelines for action to improve first-line reception centres for children and to ensure that children receive special protection and that the principle of the best interests of the child is respected.²⁰²

95. JS22 recommended establishing a refugee status determination procedure that includes the provision of legal advice and guarantees protection for the rights of all persons applying for international protection, including by means of a protocol for identifying situations of vulnerability.²⁰³

96. Joint Submission (JS19) noted that migrants were placed in internment centres where they were deprived of their liberty and criminalized when it was not possible to proceed with their expulsion.²⁰⁴ JHA recommended ensuring that the rights of migrants, including those who enter Spain irregularly, are respected, in particular their basic rights.²⁰⁵

97. JS15 welcomed the fact that work had begun on the development of a new strategic plan for citizenship and integration, and that Spain has signed the Global Compact for Safe, Orderly and Regular Migration.²⁰⁶

Notes

- ¹ The stakeholders listed below have contributed information for this summary; the full texts of all original submissions are available at: www.ohchr.org.

Civil society

Individual submissions:

ACDC	Associació Catalana pels Drets Civils (Spain);
ACDDH	Associació Catalana per a la Defensa dels Drets Humans (Spain);
ACP	Associació Catalana de Professionals (Spain);
Actuavallès	Asociación Actuavallès (Spain);
AEB	Asamblea por una Escuela Bilingüe de Cataluña (Spain);
Afectats	Associació d' Afectats 1-O (Spain);
AFNM	Asociación de Familias Numerosas de Madrid (Spain);
AIPD	International Alliance for peace and development (Switzerland);
AQR	Associació de Querellants per la República;
APB	Asociación de Profesores por el Bilingüismo (Spain);
Avalot	Joves UGT Catalunya (Spain);
Behatokia	El Observatorio Vasco de Derechos Humanos (Spain);
Cáritas	Cáritas Española (Spain);
CERMI	Comité Español de representantes de personas con discapacidad (Spain);
CGNK	Centre for Global Nonkilling (Switzerland);
CJE	Consejo de la Juventud de España (Spain);
CNDC	Consejo Nacional de las Mujeres de Cataluña (Spain);
CNJC	Consell Nacional de Joventut de Catalunya (Spain);
CST	Asociación Catalunya Somos Todos. Tots som España (Spain);
DJC	Associació democràcia i justícia per Catalunya (Spain);
DqD	Defender a quien Defiende (Spain);
ECAT	Empresaris de Catalunya (Spain);
EE	Etixerat Elkartea (Spain);
ELEAK	ELEAK-Libre Mugimendua (Spain);
ELEN	European Language Equality Network (Belgium);
Enraizados	Enraizados (Spain);
EUAFR	European Union Agency for Fundamental Rights (Austria);
EUROMIL	The European Organisation of Military Associations and Trade Unions (Belgium);
Eskubi	Asociación Eskubideak (Spain);
EZF	Egiari Zor Fundazioa (Spain);
FCM	Fundación CERMI MUJERES (Spain);
FLD	Front Line Defenders (Ireland);
Freemuse	Freemuse Defending Artistic Freedom (Denmark);
DSF	Fundacion Sin Daño;
FSG	Fundación Secretariado Gitano (Spain);
FT	Fair Trials (United Kingdom of Great Britain and Northern Ireland);
ITF	International Transport Workers' Federation (United Kingdom of Great Britain and Northern Ireland);
GPPiM	Grupo de Periodistas Pi i Margall (Spain);
HHRR	Associació de juristes pels drets humans del maresme;
HRWF	Human Rights Without Frontiers (Belgium);
HSLDA	Home School Legal Defense Association (United States of

	America);
HW	Asociación Humanity Wings Maresme (Spain);
ICAN	International Campaign to Abolish Nuclear Weapons (Switzerland);
IC	Impulso Ciudadano (Spain);
JAI	Just Atonement Inc. (United States of America);
OLRC	El Observatorio para la Libertad Religiosa y de Conciencia (Spain);
Ombudsman	El Síndic de Greuges (Ombudsman) de Catalunya (Spain);
Òmnium	Cultural (Spain);
OSCE-ODIHR	Organization for Security and Co-operation in Europe-Office for Democratic Institutions and Human Rights (Poland);
IOS	SOS Racisme Catalunya (Spain);
SURT	Fundació de dones (Spain);
TIE	Transparency International España (Spain);
U+D	Fundación Unidad + Diversidad (Spain);
UNICEF	UNICEF Comité Español (Spain);
WoW	Women of the World Platform (Spain).
<i>Joint submissions:</i>	
JS1	Joint submission 1 submitted by: IKASMIRAK, Centro interdisciplinar de estudios jurídicos de la UPV/EHU, de la Red Ciudadana SARE (Spain);
JS2	Joint submission 2 submitted by: Plataforma de Infancia and 67 other contributors (Spain);
JS4	Joint submission 4 submitted by: Plataforma DESC España and its 19 contributors (Spain);
JS5	Joint submission 5 submitted by: LEMAT Abogados, Campanario Abogados, Bufete Choclán, Sánchez-Cervera Abogados (Spain);
JS6	Joint submission 6 submitted by: Observatori del Deute en la Globalització, Xnet, Institut de Drets Humans de Catalunya (Spain);
JS7	Joint submission 7 submitted by: Istituto Internazionale Maria Ausiliatrice, International Volunteerism Organization for Women, Education, Development (Switzerland/Italy);
JS8	Joint submission 8 submitted by: Comité nacional para la prevención del tabaquismo, Fundación más que ideas, Action on smoking and health, Asociación de afectados por cáncer de ovario, Asociación alfa-1 España, de pacientes y familiares afectados por el déficit de alfa-1 antitripsina, Asociación española contra el cáncer, Asociación madrileña de trasplantados de pulmón y familiares, Corporate Accountability International, Consejo Estatal de estudiantes de medicina, Coordinadora nacional de artritis, European network for smoking and tobacco prevention, Federación de asociaciones de enfermería comunitaria y atención primaria, Federación de mujeres jóvenes, Fundación para la investigación en salud, Sociedad española de medicina de familia y comunitaria, nofumadores.org, Sociedad española de cirugía torácica, Sociedad española de especialistas en tabaquismo, Sociedad española de médicos de atención primaria, Sociedad española de medicina interna, Sociedad española de neumología y cirugía torácica, Sociedad española de neurología, Sociedad española de salud pública, Sociedad madrileña de neumología y cirugía torácica (United States of America);
JS10	Joint Submission 10 submitted by: La plataforma en defensa de la libertad de información, Access Info Europe, Federación de sindicatos de periodistas, Grupo de estudios de política criminal, Grupo de investigación “regulación jurídica y participación del ciudadano digital” (universidad complutense de Madrid) (Spain);
JS11	Joint Submission 11 submitted by: col.lectiu praga,

- JS12 Associació llibertat, democràcia i justícia (Spain);
Joint Submission 12 submitted by: la coalición ActivaMent Catalunya Associació – Hierbabuena Asociación para la Salud Mental – Federación Andaluza En Primera Persona (Spain);
- JS13 **Joint Submission 13 submitted by:** Fundació Catalunya Fons per a la Defensa dels drets dels Catalans, La Fundació Privada Congrés de Cultura Catalana (Spain);
- JS14 **Joint Submission 14 submitted by:** Plataforma per la Llengua, Language Rights (Spain);
- JS15 **Joint Submission 15 submitted by:** Clínica Jurídica de la Facultad de Derecho de la Universidad de Murcia, Fundación Cepaim (Spain);
- JS16 **Joint Submission 16 submitted by:** ADF International, World Evangelical Alliance, Alianza Evangélica Española (Switzerland);
- JS17 **Joint Submission 17 submitted by:** the European Center for Constitutional and Human Rights, Fundación Raices, Andalucía Acoge (Germany);
- JS18 **Joint Submission 18 submitted by:** International Trial, Associació Catalana per a la Defensa dels Drets Humans, Col.lectiu.Praga, Institut de Drets Humans de Catalunya, Irídia – Centre per la Defensa dels Drets Humans, Novact, Instituto Internacional por la Acción Noviolenta and Observatorio del Sistema Penal y los Derechos Humanos (Spain);
- JS19 **Joint Submission 19 submitted by:** Asociación KARIBU, Asociación CASA DE TODOS, VIVAT International (United States of America);
- JS21 **Joint Submission 21 submitted by:** Coppieters Foundation, Centre Internacional Escarré per a les Minories Ètniques i Nacionals (Belgium);
- JS22 **Joint Submission 22 submitted by:** ActivaT en Derechos Humanos, Andalucía Acoge, Asociación ELIN, Asociación Pro Derechos Humanos de España, CESAL, Diaconia, Irídia – Centro para la Defensa de los Derechos Humanos, Movimiento por la Paz – MPDL, Pueblos Unidos, Provienda, Red Acoge, Stop Mare Mortum, Foro de abogad@s de izquierdas – Red de abogad@s demócratas (Spain);
- JS23 **Joint Submission 23 submitted by:** UGT de Catalunya, Comisiones Obreras de Catalunya (Spain);
- JS24 **Joint Submission 24 submitted by:** Freemuse, PEN Català and PEN International (Denmark);
- JS26 **Joint Submission 26 submitted by:** Òmnium Cultural, Associació Catalana per a la Defensa dels Drets Humans (Spain);
- JS27 **Joint Submission 27 submitted by:** Federación de Asociaciones para la Prevención del Maltrato Infantil, Asociación Catalana para la Infancia Maltratada, Asociación Andaluza para la Defensa de la Infancia y la Prevención del Maltrato Infantil, Asociación Murciana de Apoyo a la Infancia Maltratada, Asociación Castellano-Leonesa para la Defensa de la Infancia y la Juventud, Asociación Asturiana para la Atención y Cuidado de la Infancia, Asociación Vasca para la Ayuda a la Infancia Maltratada, Centro de Asistencia a Víctimas de Agresiones Sexuales y Maltrato Infantil, Red de Ayuda a Niños Abusados, Asociación contra el Abuso y Maltrato Infantil en Galicia, Asociación Pro-Infancia Riojana (Spain);
- JS28 **Joint Submission 28 submitted by:** Fundación CEPAIM, the European Network on Statelessness and the Institute on Statelessness and Inclusion (The Netherlands);
- JS29 **Joint Submission 29 submitted by:** Fundación Marista para la Solidaridad Internacional, Solidaridad, Educación y Desarrollo, Fundación Marcelino Champagnat, Fundació

JS30	Champagnat, Asociación Espiral Loranca, Fundación Juan Bautista Montagne (Switzerland); Joint Submission 30 submitted by: Fundació Ficat, Associació Human Rights Cat y Associació Grup de Juristes Roda Ventura (Spain);
JS31	Joint Submission 31 submitted by: Assemblea Nacional Catalana, Unrepresented Nations and Peoples Organization (Spain);
JS33	Joint Submission 33 submitted by: Federación de Planificación Familiar Estatal, Sexual Rights Initiative (Canada);
JS34	Joint Submission 34 submitted by: Grup de Periodistes Ramon Barnils European Civic Forum (France);
JS35	Joint Submission 35 submitted by: Asociación Europea por las Energías Renovables, Associació juristes pels drets humans (Spain);
JS36	Joint Submission 36 submitted by: Article 19 and European Centre for Press and Media Freedom (United Kingdom of Great Britain and Northern Ireland);
JS39	Joint Submission 39 submitted by: Associació coordinadora de l'advocacia de catalunya, Associació democràcia i justícia per catalunya (adjc), Ssociació de juristes de les terres del ebre per les llibertats (ajtell) y Clam per la llibertat (Spain);
JS40	Joint Submission 40 submitted by: Fundación Raíces, Associació Noves Vies (Spain);
JS41	Joint Submission 41 submitted by: Asociación Pro Derechos Humanos de Andalucía – Cádiz, Asociación Pro Derechos Humanos de Andalucía – Sevilla – Burorresistiendo Calala Fondo de Mujeres Grupo Estudios Internacionales GERI – Universidad Autónoma de Madrid – Instituto de Derechos Humanos de Catalunya – Irídia – Centro de Defensa de los Derechos Humanos – Legal Sol – NOVACT Instituto Internacional para la Acción Noviolenta – Plataforma por la Desobediencia Civil.

National human rights institution:

SPU Defensor del Pueblo de España (Spain).

Regional intergovernmental organization(s):

COE The Council of Europe, Strasbourg (France);

Attachments:

CPT – European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment, Report to the Spanish Government on the 2016 visit to Spain, CPT34 (2018);

GRETA – The Council of Europe Convention on Action Against trafficking in Human Beings, GRETA Evaluation Report to Spain (2nd Evaluation Round, 2018);

Advisory Committee on the Framework Convention for the Protection of National Minorities – 4th Opinion on Spain adopted by the Advisory Committee on the Framework Convention for the Protection of National Minorities (2014);
European Charter for Regional or Minority Languages – 5th periodical report on Spain (2018);

Council of Europe Commissioner for Human Rights – Third Party intervention to the European Court of Human Rights in the case Caamano Valle vs Spain (2018);
Commissioner for Human Rights letter to the Minister of the Interior of Spain (2018).

² See Ombudsman's report. pp. 1–9.

³ See Ombudsman's report. pp. 1–9.

⁴ The following abbreviations are used in UPR documents:

ICERD	International Convention on the Elimination of All Forms of Racial Discrimination;
ICESCR	International Covenant on Economic, Social and Cultural

	Rights;
OP-ICESCR	Optional Protocol to ICESCR;
ICCPR	International Covenant on Civil and Political Rights;
ICCPR-OP 1	Optional Protocol to ICCPR;
ICCPR-OP 2	Second Optional Protocol to ICCPR, aiming at the abolition of the death penalty;
CEDAW	Convention on the Elimination of All Forms of Discrimination against Women;
OP-CEDAW	Optional Protocol to CEDAW;
CAT	Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment;
OP-CAT	Optional Protocol to CAT;
CRC	Convention on the Rights of the Child;
OPAC	Optional Protocol to CRC on the involvement of children in armed conflict;
OP-CRC-SC	Optional Protocol to CRC on the sale of children, child prostitution and child pornography;
OP-CRC-IC	Optional Protocol to CRC on a communications procedure;
ICRMW	International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families;
CRPD	Convention on the Rights of Persons with Disabilities;
OP-CRPD	Optional Protocol to CRPD;
ICPPED	International Convention for the Protection of All Persons from Enforced Disappearance.

⁵ For relevant recommendations see A/HRC/29/8, paras. 131.1–9, 131.21–24 and 131.103.

⁶ See JS30, para. 53.1. See also *Cáritas*, page 1. See JAI, para. 35.

⁷ See ICAN, page 1.

⁸ See ACDC, para. 22 (a).

⁹ For relevant recommendations see A/HRC/29/8, paras. 131.10–20, 131.29, 131.30, 131.33, 131.35, 131.37, 131.02 and 131.104.

¹⁰ See JS4, page 3.

¹¹ See *Cáritas*, page 1.

¹² For relevant recommendations see A/HRC/29/8, paras. 131.25–28, 131.36, 131.38–51, 131.161, 131.163 and 131.164.

¹³ See FSG, page 2.

¹⁴ See JS4, page 1.

¹⁵ See JAI, para. 39. See JS24, page 12, JS4, page 2, OSCE-ODIHR, para. 11–23.

¹⁶ See FSG, page 5 and JS15, para. 59.

¹⁷ See *Actuavallès*, page 5.

¹⁸ See SOS, para. 2.1.

¹⁹ See SOS, para. 2.3 (b).

²⁰ See SOS, para. 2.3 (f) See also FSG, page 6.

²¹ See AEB, page 1, page 2, APB, for III.4, III.7, ECAT, page 1, *Enraizados*, page 7, U+D, page 2.

²² See AEB, pages 3–5, See CST, page 3.

²³ See ELEN, page 3.

²⁴ The European Charter for Regional or Minority Languages, page 8, 14.

²⁵ See JS14, page 15.

²⁶ See ELEN, page 8. See ELEN, page 7.

²⁷ See JS14, page 15. See JS14, page 7 and IC, page 4.

²⁸ For relevant recommendations see A/HRC/29/8 131.188 and 131.189.

²⁹ See JS6, para. 32.

³⁰ See JS6, para. 46.

³¹ See JS35, para. 56.

³² See JS4, page 10.

³³ See ITF, para. 23.

³⁴ See CGNK, page 7.

³⁵ See JS6, para. 52.

³⁶ See Catalan Ombudsman, page 3.

³⁷ For relevant recommendations see A/HRC/29/8.

³⁸ See FT, para. 25.

³⁹ See FLD, para. 5. See JS24, pages 6 and 8, *Freemuse*, pages 2 and 6 and JS31, para. 26, *Eskubideak*, page 5, *DqD*, page 7, *Behatokia*, pages 1–2.

- 40 See JS24, page 12. See FT, pages 1–2, FLD, para. 5, 17 (a), JS24, page 4 and JS31, page 12, DqD, para. 4.1.
- 41 For relevant recommendations see A/HRC/29/8.
- 42 See JS41, page 11.
- 43 See JS41, page 13.
- 44 See JS41, page 13.
- 45 See JS41, page 13.
- 46 See JAI, para. 34, See JS41, page 12, CGNK, page 6 and JS24, page 2.
- 47 See DJC, paras. 18, 26–28; AIPD, pages 3 and 5; JS21, page 20; Afectats, pages 3, 5–6; JS39, paras. 12, 16, 26 and 30, JS34, para. 29, JS26, para. 13–16.
- 48 See JS39, para. 33; JS18, page 1; and HHRR, page 1.
- 49 See DJC, paras. 11, 13 and 15; JS39, paras. 20 and 33 and JS11, page 3.
- 50 See Afectats, page 7.
- 51 See DJC, para. 29.
- 52 See HHRR, pages 2–3.
- 53 See HHRR, page 4.
- 54 See JS11, page 4 and JS18, page 12. See DJC, para. 35; JS31, para. 15; JS39, para. 36 and JS41, page 10, JS26, para. 35–36, 53–56.
- 55 See Afectats, page 7.
- 56 See FT, para. 9.
- 57 See JS5, para. 5.
- 58 See HRWF, pages 2–3. See JS5, paras. 8–10.
- 59 See FLD, para. 4,11. See JS11, page 2; JS39, para. 49, 50; JS18, page 6; JS41, page 11; ACDDHH, para. 13. Ómnium, para. 14, 15.
- 60 See JS11, page 4 and JS18, pages 6, 8 and 12, Ómnium, page 5, AQR, page 2.
- 61 See IC, page 4.
- 62 See ACDC, para. 22 (d), See also Eskubideak, page 5.
- 63 See FT, para. 20.
- 64 See Crosby, para. 30. See HRWF, page 6.
- 65 See EZF, page 11.
- 66 See JS5, para. 62.
- 67 For relevant recommendations see A/HRC/29/8, paras. 131.52–131.64, 131.75 and 131.94–131.101.
- 68 See JS18, page 13, See ACDC, para. 22 (c).
- 69 See CoE, page 8.
- 70 See TIE, page 7.
- 71 See TIE, page 6.
- 72 See CGNK, pages 6–7.
- 73 See EZF, paras. 2, 3 and 9.
- 74 See CGNK, page 7.
- 75 See CGNK, pages 6–7.
- 76 For relevant recommendations see A/HRC/29/8, paras. 131.108–131.115.
- 77 See ACDC, para. 5, See also DqD, page 5, FDL, para. 3.
- 78 See JS41, page 5.
- 79 See FLD, paras. 3 and 10. See ELEAK, page 5 and JS41, page 8.
- 80 See JS41, page 6, FLD, para. 5, 10.
- 81 See ELEAK, page 4.
- 82 See ELEAK, pages 1–3.
- 83 See JS41, page 6.
- 84 See Freemuse, page 8.
- 85 See AIPD, page 4.
- 86 See JS18, page 13, See also, FDL, para. 17 (a).
- 87 See JS31, page 12, See also Ómnium, page 5.
- 88 See JS24, page 13.
- 89 See JS24, page 12. See JS10, page 10; JS11, page 4; JS18, page 12., Recos. 131.111–131.115. AC, page 7; JS41, page 12; ACDC, para. 22 (b); JS24, page 1; ELEAK, page 5.
- 90 See ACP, page 3.
- 91 See ACP, pages 6–7. See HO, para. 3 (j).
- 92 See JS10, page 10, See also DqD, page 6.
- 93 See JS31, page 12, See also GPPiM, page 1.
- 94 See JS10, page 9.
- 95 See CST, page 6, See also ECAT, page 2.
- 96 See FLD, para. 12.
- 97 See FLD, paras. 14–15.

- ⁹⁸ See FLD, para. 17 (g).
- ⁹⁹ See CJE, page 3.
- ¹⁰⁰ See CJE, page 3.
- ¹⁰¹ See OLCRC, page 6.
- ¹⁰² See JS16, para. 15 (a), See also Enraizados, page 6.
- ¹⁰³ See JS16, para. 15 (c).
- ¹⁰⁴ For relevant recommendations see A/HRC/29/8, paras. 131.87–131.93.
- ¹⁰⁵ UNICEF, para. 27.
- ¹⁰⁶ See Cáritas, page 5.
- ¹⁰⁷ See JS27, page 7.
- ¹⁰⁸ See CoE, page 6.
- ¹⁰⁹ For relevant recommendations see A/HRC/29/8, paras. 131.105 and 131.106.
- ¹¹⁰ See EE, paras. 7, 15 and 22, See also JS1, para. 15, 16, 32.
- ¹¹¹ See EE, paras. 15–22, 25 and 28.
- ¹¹² For relevant recommendations see A/HRC/29/8, paras. 131.117–131.120.
- ¹¹³ See JS4, page 3.
- ¹¹⁴ See CJE, para. 3.
- ¹¹⁵ See FCM, page 8. See CNJC, page 3.
- ¹¹⁶ See CJE, page 2.
- ¹¹⁷ See JS4, pages 3–4. See CNJC, page 2.
- ¹¹⁸ See JS23, page 3. See CNJC, page 2.
- ¹¹⁹ For relevant recommendations see A/HRC/29/8, paras. 131.123, 131.124 and 131.126–131.134.
- ¹²⁰ See JS4, page 1, See also Avalot, page 7.
- ¹²¹ See JS4, page 6.
- ¹²² See JS4, page 5.
- ¹²³ See CNJC, page 3.
- ¹²⁴ See JS4, page 7. See CNJC, page 3.
- ¹²⁵ See JS4, page 6.
- ¹²⁶ See CJE, page 2.
- ¹²⁷ See Cáritas, page 5.
- ¹²⁸ See Cáritas, page 5, See also Avalot, page 12.
- ¹²⁹ See FSG, page 3.
- ¹³⁰ See UNICEF, para. 4, FSG, page 3 and JS15, para. 42.
- ¹³¹ See JS4, page 6.
- ¹³² See JS4, page 6, See also EUAFR, page 5.
- ¹³³ See FSG, page 6.
- ¹³⁴ For relevant recommendations see A/HRC/29/8, paras. 131.131 and 131.136–131.141.
- ¹³⁵ See JS15, paras. 18 and 25, See also FSD, page 2.
- ¹³⁶ See JS33, para. 38.
- ¹³⁷ See JS33, para. 39.
- ¹³⁸ See JS33, paras. 17–18.
- ¹³⁹ See JS8, pages 2–4.
- ¹⁴⁰ See JS8, pages 3–4 and 7.
- ¹⁴¹ See JS8, page 11.
- ¹⁴² For relevant recommendations see A/HRC/29/8, paras. 131.142–131.151.
- ¹⁴³ See JS4, page 7.
- ¹⁴⁴ See JS7, para. 15a–b, See also, JS2, para. 12.1.
- ¹⁴⁵ See JS4, pages 7–8. See JS7, paras. 31–32, JS2, para 12.2.
- ¹⁴⁶ See JS4, page 8.
- ¹⁴⁷ See JS4, page 8. See JS7, paras. 15(a)–15(b); CNJC, page 3; and JS7, para. 12, JS2, para. 14.3.
- ¹⁴⁸ See Catalan Ombudsman, page 4, See also JS2 para. 12.4.
- ¹⁴⁹ See Catalan Ombudsman, page 3.
- ¹⁵⁰ For relevant recommendations see A/HRC/29/8, paras. 131.32, 131.34, 131.65–131.74 and 131.76–131.83.
- ¹⁵¹ See JS7, para. 28.
- ¹⁵² See SURT, page 2. See FLD, para. 16 and S7, para. 29 (a) (c).
- ¹⁵³ See JS15, para. 41.
- ¹⁵⁴ See JAI, para. 38.
- ¹⁵⁵ See JS7, para. 25.
- ¹⁵⁶ See JS15, para. 34.
- ¹⁵⁷ See JS4, page 4.
- ¹⁵⁸ See JS4, page 4.
- ¹⁵⁹ See WoW, paras. 14–16.

- ¹⁶⁰ See AFNM, page 6.
- ¹⁶¹ See ITF, para. 14. See also WoW para. 1, EUAFR, page 10.
- ¹⁶² See CNDC, para. 2.
- ¹⁶³ See CNDC, para. 11.
- ¹⁶⁴ See FCM, page 6. See also EUROMIL, page 3.
- ¹⁶⁵ See SURT, page 1.
- ¹⁶⁶ For relevant recommendations see A/HRC/29/8, paras. 131.84–131.86.
- ¹⁶⁷ See JS29, paras. 7, 14.1 and 14.2.
- ¹⁶⁸ See CoE, page 7.
- ¹⁶⁹ See JS27, page 12. See JS29, para. 10 (b), para. 12 (a) and JS27, para. 63.
- ¹⁷⁰ See JS29, para. 12 (b) (i) (j).
- ¹⁷¹ See JS15, para. 42.
- ¹⁷² See JS29, para. 11 (e)(a).
- ¹⁷³ See JS27, page 7. See also JS2, para. 21.
- ¹⁷⁴ For relevant recommendations see A/HRC/29/8, paras. 131.152–131.157.
- ¹⁷⁵ See CoE, page 2 and JS12, para. 6. See JS15, para. 70 and CERMI, page 5.
- ¹⁷⁶ See JS12, paras. 7–8.
- ¹⁷⁷ See FCM, page 1, recos. (131.70).
- ¹⁷⁸ See FCM, page 2.
- ¹⁷⁹ See JS12, para. 15 (a)(c)(d).
- ¹⁸⁰ See JS7, para. 10 (b).
- ¹⁸¹ See CERMI, page 5.
- ¹⁸² For relevant recommendations see A/HRC/29/8, paras. 131.158–131.160.
- ¹⁸³ See FSG, page 3, recos. (131.45–131.51).
- ¹⁸⁴ See FSG, page 3.
- ¹⁸⁵ See FSG, page 4.
- ¹⁸⁶ See FSG, page 4.
- ¹⁸⁷ See FSG, page 6.
- ¹⁸⁸ CoE, page 5. See also EUAFR, page 4.
- ¹⁸⁹ See FSG, page 6. See also EUAFR, page 4.
- ¹⁹⁰ For relevant recommendations see A/HRC/29/8, paras. 131.121, 131.122, 131.135, 131.162 and 131.165–131.187.
- ¹⁹¹ See JS15, para. 8. See JS17, paras. 12, 19 and 26. EUAFR page 9, JS28, para. 21.
- ¹⁹² See JS17, paras. 9, 12, 8, 20, 21, and 29. See JS40, para. 54; JS22, pages 3–4; IPD, pages 3–4; and HW, page 2.
- ¹⁹³ See JS22, page 9. See JS17, page 12: JS40, para. 55; and Cáritas, page 4, JS2, paras. 32–35.
- ¹⁹⁴ CoE, page 2.
- ¹⁹⁵ See JS22, pages 8–9. See also UNICEF, paras. 17 and 19.
- ¹⁹⁶ See JS22, page 10. See also JS19, page 6.
- ¹⁹⁷ See JS22, pages 2, 5 and 7. See JS15, para. 15.
- ¹⁹⁸ See JS40, para. 9.
- ¹⁹⁹ See JS30, para. 32. See JS17, para. 14, JS2 para. 25.
- ²⁰⁰ See JS40, para. 46.
- ²⁰¹ See JS40, para. 49.
- ²⁰² See JS7, paras. 21 and 23 (b). See Cáritas, page 4; JS27, page 9; JS29, paras. 22.1, 28.1 and 28.4; JS30, paras. 8–9 and 53.6; and JS40, para. 33, UNICEF, para. 23.
- ²⁰³ See JS22, page 10.
- ²⁰⁴ See JS19, paras. 8–9.
- ²⁰⁵ See JAI, para. 36.
- ²⁰⁶ See JS15, paras. 18 and 25.
-