

# Women's Initiatives Supporting Group (WISG)

## Rights of LBT Women in Georgia

### Shadow Report for CEDAW

State Party: Georgia

*Submitted for the 58<sup>th</sup> Session  
Geneva, Switzerland  
30 June– 18 July 2014*



Submitted by: Women's Initiatives Support Group (WISG)  
Autors: Eka Agdgomelashvili, Ana Natsvlshvili

This report was prepared by **Women's Initiatives Supporting Group (WISG)** a non-governmental, non-profit-making organization working on LBT women's rights in Georgia.

Financial support was provided by the "Open Society – Georgia Foundation."

*The report relies on the methodology devised by IGLHRC (International Gay and Lesbian Human Rights Commission). Information in the report is organized according to the articles of the CEDAW Convention and further indicates relevant provision from Yogyakarta Principles. The report is based on materials collected and documented by WISG: cases of human rights violations of LBT women in Georgia, interviews and focus groups conducted with community members, NGOs working on LBT rights and other related issues, a representative of the Public Defender's Office in Georgia and other experts, results of media monitoring of homophobic hate speech conducted by WISG in 2003-2011, WISG's discrimination study conducted in 2012, results of monitoring of CM/rec(2010)5 recommendation in Georgia (2013) and other reports by international stakeholders.*

## Executive Summary

In Georgia LBT women are victims of double discrimination - based on their sex, as well as sexual orientation/gender identity. Root causes of this discrimination and violence against LBT women lie in deeply rooted gender stereotypes and conservative moors of the society, gaps and shortcomings in the legislation and indifferent state policy towards women in general and LBT women in particular.<sup>12</sup> The fact that the state report for CEDAW does not even cover LBT women as such is a clear indication that LBT women are one of the most marginal and invisible groups of the society.

This report focuses on gaps and deficiencies in the law, as well as practice which undermine protection of LBT women's rights in Georgia.

Over the past decade the legal environment for L(G)BT persons has improved. Nevertheless, rather than being the result of a targeted and well-designed state's policy and actions, these improvements are only the side-effects of a broader process of Georgia joining and/or aspiring to join the EU.

Violence against LGBT people (verbal as well as psychological and physical abuse, bullying and particularly domestic violence) remains widespread in Georgia. Nevertheless, fearing homophobic treatment, victims remain highly reluctant to report such incidents to the police or other relevant institutions.

No statistical data exists about the hate crimes committed on the basis of homophobic and transphobic hatred in Georgia.<sup>3</sup> Until March 2012 commission of a crime based on the victim's sexual orientation or gender identity was not considered an aggravating circumstance of the crime, unlike e.g., victim's religion. Now, it remains to be seen how effective this amended provision will be in practice. Until now, no investigation has started under this article.

Law for the protection of victims of domestic violence does not apply to LBT couples.

Sex reassignment surgery is legally accessible in Georgia; however, due to high costs, it remains practically unavailable for many. Furthermore, as the state has not established uniform legal regulations, each medical institution retains a discretionary power to establish its own rules and procedures for sex reassignment surgery. Changing one's official documents after changing sex remains problematic.

Hate speech is not prohibited by law; certain media self-regulatory mechanisms do cover the issue however. Media monitoring reports demonstrate that the peak of the use of hate speech usually coincides with the periods of struggle for distribution of political power in the country; at such times "non-traditional" sexuality is turned into an object of political speculations<sup>4</sup>.

Inclusion of sexual orientation and gender identity in the National Human Rights Strategy (2014-2020) and Human Rights Action Plan (2014-15) is a positive step, since it is the first time SOGI equality has been included in state's strategic documents. Based on these documents, the state undertook the obligation to adopt anti-discrimination law and to train police in identifying and adequately reacting to hate crimes. WISG's recommendations regarding transgender persons were, unfortunately, not taken into consideration however.

2014 marked the adoption of a comprehensive anti-discrimination law in Georgia. While the law clearly states that discrimination is prohibited, inter alia, on the basis of sexual orientation and gender identity, it fails to establish effective mechanisms for combating discrimination in practice.<sup>5</sup>

---

<sup>1</sup> Monitoring of implementation of CM/REC(2010)5 in Georgia. WISG. Tbilisi. 2012. [http://women.ge/wp-content/uploads/2013/01/CM\\_REC20105GEORGIA\\_ENG\\_extended-version.pdf](http://women.ge/wp-content/uploads/2013/01/CM_REC20105GEORGIA_ENG_extended-version.pdf)

<sup>2</sup> Public perceptions of Gender equality in Politics and Business. UNDP. 2013 [http://ungeorgia.ge/uploads/GE\\_UNDP\\_Gender\\_Research\\_ENG.pdf](http://ungeorgia.ge/uploads/GE_UNDP_Gender_Research_ENG.pdf)

<sup>3</sup> see the State Report on the implementation of CM/Rec(2010)5

[http://www.coe.int/t/dghl/standardsetting/hrpolicy/Others\\_issues/LGBT/Questionnaire/LGBT\\_Georgia.pdf](http://www.coe.int/t/dghl/standardsetting/hrpolicy/Others_issues/LGBT/Questionnaire/LGBT_Georgia.pdf);

<sup>4</sup> E. Aghdgomelashvili. Homophobic Hate Speech and Political Processes in Georgia, LGBT. Situation of LGBT Persons in Georgia. WISG. Tbilisi, 2012.

<sup>5</sup> Appeal of Non-governmental Organizations and Religious Groups to the Government of Georgia about the Draft Law on the Elimination of all Forms of Discrimination. <http://www.civil.ge/files/files/2014/Anti-Discrimination-Statement-April%2028-2014%20-eng.pdf>

## **Violence against Women**

*CEDAW Convention, Article 1-4, 6, General Recommendation #19, [Yogiakarta Principles, 5]*

Despite the positive legislative changes, negative attitudes towards LBT community are increasing, which is reflected in the extent of physical and psychological violence against the community members. The discrimination study conducted by WISG revealed that **LBT people often experience physical violence, as well as blackmailing, threats and verbal abuse due to their sexual orientation or gender non-conformist behavior/expression**. Based on our study, 20% of all LB respondents have experienced physical violence and 85% have experienced psychological violence at least once during the last two years<sup>6</sup>.

**In the majority of cases victims do not report this to the police or human rights organizations**, mostly because they are afraid of coming out in a deeply homophobic society<sup>7</sup>. Organizations and individual experts working on LBT rights unanimously observe that high level of homophobia in the society, as well as lack of women's financial independence, facilitate and encourage violence<sup>8</sup>. Reportedly transgender people pointed out that they are also often subjected to pressure, violence, and threats, including domestic violence. Family members often force them to undergo treatment to "become normal."<sup>9</sup> Interviews revealed a number of instances when **police officers threatened, verbally abused or treated LBT individuals and lesbian couples in a cynical way, or failed to protect them when on duty**. Reportedly "sex workers, including LGBT sex workers, often become victims of police violence. However because prostitution is prohibited by law and is subject to an administrative fine, sex workers do not report abuses against them and abusers go unaccountable."<sup>10</sup>

According to the law, investigating an incident against the juvenile requires involvement of her parents or legal representatives during each investigative activity (i.e. taking a witness statement, etc.) . This may be a serious barrier for juveniles who have not come out to their parents to report incidences of abuse against them.

**The Law on Domestic Violence regulates relationship between various family members as well as couples in registered or non-registered marriage, which therefore excludes LBT couples as**.<sup>11</sup> Marriage in the Civil Code of Georgia is defined as a relationship between a man and a woman.<sup>12</sup> Thus, unlike heterosexual couples, L(G)BT couples remain unprotected against domestic violence from their partners.<sup>13</sup>

As for LBT people's condition in penitentiary system, in the reportedly L(G)BT inmates were often discriminated in previous years.<sup>14</sup> Information about their conditions is unavailable<sup>15</sup>. The New Imprisonment Code provides for the right to a visit, which also applies to unmarried couples, provided they can certify to have lived together for at least two years. It is unclear however, how LBT couples can certify their cohabitation. Moreover, considering the high level of homophobia in the society, it is unlikely that LBT couples will make use of this right in practice.

**Enjoying the right to freedom of assembly and manifestation** remains a significant problem for the members of L(G)BT community. Until 2012 have not been attempts to organize a gay pride in Georgia. Nevertheless, several demonstrations against LGBT people or alleged plans to hold a gay-pride in Georgia took place in recent years. In 2007 the campaign – "All Different- All Equal," which was perceived as a

---

6 Situation of LGBT Persons in Georgia. WISG. Tbilisi, 2012. [http://women.ge/wp-content/uploads/2012/12/WISG\\_situation-of-lgbt-persons-in-Georgia\\_ENG-www.pdf](http://women.ge/wp-content/uploads/2012/12/WISG_situation-of-lgbt-persons-in-Georgia_ENG-www.pdf)

7 The research carried out by WISG in 2010 shows that 72.2% of the respondents state that the negative attitudes in the society, triggering fear of rejection, social isolation and marginalization, prevent them from coming out. Sexual and self-destructive behavior study among LBT group. WISG. 2010. Tbilisi. <http://women.ge/wp-content/uploads/2011/02/Sexual-and-Self-Deconstructive-behaviour-Among-LBT.pdf>

8 The level of unemployment among the members of LBT community is 1,75 times higher than in the same age group across the country. 62, 5% of the group members live with their parents, other members of the family, spouse or children.

9 Materials for preparation of CEDAW shadow report concerning LBT women's situation in Georgia. WISG. 2012. [http://women.ge/wp-content/uploads/2012/05/WISG-LBT-CEDAW-shadow-report\\_eng.pdf](http://women.ge/wp-content/uploads/2012/05/WISG-LBT-CEDAW-shadow-report_eng.pdf)

10 ibid

11 Law of Georgia on Elimination of Domestic Violence, Protection of and Support to Its Victims, art. 2

12 Civil Code of Georgia, article 1106

13 On March 28, while talking about the Anti-Discrimination bill at the government meeting, Prime Minister of Georgia, Irakli Garibashvili, voiced a new initiative to insert a clause in the constitution, defining family (Prime Minister probably meant marriage) as a union between a man and a woman. Prime Minister also clarified, that this decision was made in order to avoid any "misinterpretation" of the Anti-Discrimination law:

"Despite the fact that Georgian legislation already defines family as a union between a man and a woman, in order to avoid misinterpretation, I believe it is desirable for this Constitutional amendment to exist." Carrying through this amendment, will inevitably and directly put LBT couples in a discriminatory position. A Homophobic Constitutional Initiative. <http://women.ge/en/2014/03/29/homophobicamandm/>

14 Materials for preparation of CEDAW shadow report concerning LBT women's situation in Georgia. WISG. 2012.

15 Monitoring of implementation of CM/REC(2010)5 in Georgia. p.169. WISG. Tbilisi. 2012.

hidden form of a gay-pride, was cancelled in Georgia due to threats of violence. The statement of the Patriarchy of Georgia issued in this respect stated: "...perverted form of sexual relationships is a big sin, which requires repentance rather than a public display and propaganda."<sup>16</sup> Similar demonstrations with "preventive purposes" against gay pride were conducted in 2009, 2010, 2014 as well.

"Attempts by LGBT activists to peacefully mark the International Day against Homophobia and Transphobia in 2012 and 2013 failed. On 17 May 2013 Georgia hit the international headlines when an authorised and absolutely peaceful gathering against homophobia was violently disrupted by a massive counter-demonstration of thousands during which also Georgian Orthodox clerics played an active role. The preparedness of the police forces was insufficient and they did not manage to contain the angry mob of counter-demonstrators".<sup>17</sup> In the aftermath of May 17, there was a rise of attacks in public spaces against persons perceived as belonging to the L(G)BT community<sup>18</sup>. In 2014 Georgian Orthodox Church proclaimed May 17 to be a traditional family day and organized a large-scale march to protest against gay-marriage, anti-discrimination law and homosexual propaganda<sup>19</sup>. Due to lack of guarantees from the State, LGBT organizations were forced to give up the idea of arranging an IDAHOT demonstration in 2014.

### **Problems related to the recognition of legal identity**

*CEDAW Convention Article 1, 2, 3, 15, [Yogyakarta Principles. Principle 3]*

Sex reassignment surgery is legal in Georgia; New ID and birth certificate can be issued if the person has changed sex only after undergoing the surgery, not before. According to the law on the Civil Acts (para 78) of Georgia, a person has a right to ask the civil act registration body to make changes and/or additions to his/her entry including the name. The ground of such request includes the change of gender "if a person likes to change name or/and last name due to the change of gender."<sup>20</sup> On the other hand, there is no official definition or explanation of how we should understand "change of gender" or what are the specific documents, that the applicant is required to present in order to achieve legal recognition of his/her gender.

According to the existing practice in the civil act registration body, in the case of gender reassignment, a person is entitled to change his/her personal data in the official documents, which is a long process. Before the actual surgery a transgender person has to be observed by psychologists and sexologists. These observations last for more than a year. At the end of the process the special committee has to conclude on whether or not the applicant is a "true transsexual" and then issues a relative document. Only after this document is issued a transgender person has the right to undergo the sex reassignment surgery. One more thing to do before the operation is the hormone therapy. Consequently, **irreversible sterilization, hormonal treatment and preliminary surgical procedures are mandatory procedures which one has to go through in order to be able to obtain new documents.**<sup>21</sup>

### **Discrimination and violence against LBT human rights defenders**

*CEDAW Convention, Article 8, [Yogyakarta Principles. Principle 27, d]*

Several respondents noted that LBT rights defenders in Georgia operate in an unfriendly environment.<sup>22</sup> They often become target of homophobic media attacks. The state rarely provides them with efficient protection from the violence of third parties (see cases: Women's Fund of Georgia was forced to change the office because of the homophobic attacks from the neighbours<sup>23</sup>; the incident on Vachnadze Street, on May 17, 2013, when founders, staff of WISG and community members, were almost stoned to death<sup>24</sup>; other events that had taken place after May 17) or often performs the role of the aggressor itself (in 2009 staff members of WISG alongside with the members of LBT community became victims of violence from

---

<sup>16</sup> Statement of Catholicos-Patriarch of All Georgia, His Holiness and Beatitude Ilia II, about the gay pride planned by newspaper "Alia" in 2007

<sup>17</sup> GEORGIA IN TRANSITION . Report on the human rights dimension: background, steps taken and remaining challenges. Assessment and recommendations by Thomas Hammarberg . p.26. 2013.

<sup>18</sup> Annual Report of the Public Defender of Georgia. The situation of human rights and freedoms in Georgia. Gender Equality and Women's Rights Section. 2013

<sup>19</sup> Anti-Gay Rally on Anti-Homophobia Day. Civil Georgia, Tbilisi / 17 May.'14<http://www.civil.ge/eng/article.php?id=27241&search=>

<sup>20</sup> Monitoring of implementation of CM/REC(2010)5 in Georgia. p.169. WISG. Tbilisi. 2012.

<sup>21</sup> Ibid. page 141

<sup>22</sup> Materials for preparation of CEDAW shadow report concerning LBT women's situation in Georgia. WISG. 2012.

<sup>23</sup> US State Department Human Rights Report: Georgia. 2013. <http://www.state.gov/documents/organization/220492.pdf>

<sup>24</sup> <http://urgentactionfund.org/2013/05/homophobic-violence-erupts-at-pride-event-in-georgia-2/>

the police<sup>25</sup>). Considering the level of sexism and homophobia in our country, it is especially dangerous, when the leading politicians of the country cannot or choose not to realize the hazards, which are connected to the systematic violence against women and LGBT persons and prefer to ignore these facts of violence (Prime Minister Irakli Garibashvili's statement about the efficient work of the police on May 17, 2013 and about the fact that no one was harmed during the above mentioned events<sup>26</sup>; statement of Ms. Guguli Maghradze on PACE session, claiming that May 17, 2013 crack-down was a minor-scale attack)<sup>27</sup>.

## **Right to Education**

*CEDAW Convention, Article 10. , [Yogiakarta Principles, 16]*

Discrimination is prohibited in the field of education and equal access to education is recognized by law both in primary as well as secondary and higher education.<sup>28</sup> The practice does not always correspond with the law however. Attitudes towards LGBT persons and issues at schools and universities echo general societal patterns and are under strong influence from traditional stigmas, taboo and values promoted by the Georgian Orthodox Church.<sup>29</sup> Although bullying at school represents a problem in Georgia, the Ministry of Education is not looking into the issue, has no plans to identify the nature and scale of the problem or to address it. **School curricula do not include sex education.** State reports say that school text books are free from stereotypes. Some think that on the contrary- text books are full of homophobic and discriminatory statements.<sup>30</sup> It is not enough that the text books are not discriminatory; they must actively promote tolerance and broadmindedness, including non-discrimination based on sexual orientation and gender identity. **No special programs (awareness, psychological counseling, etc) are run at schools or in higher education institution to meet the needs of LGBT pupils/students.**

Until 2012 it was impossible for transgender people to obtain a university diploma for the second time (after changing the name). This created obstacles for transgender people in applying for a number of jobs where high education was one of the criteria. However, The Order of the Minister of Education (№120/N) dated by 26 June 2012 addressed this problem by providing the possibility to obtain the diploma for the second time, if one submits the documents proving the change of one's name.

## **Right to Health**

*CEDAW Convention, Article 12, 11[f], General Recommendation #19, #24, [Yogiakarta Principles, 17]*

Discrimination of patients based on, inter alia, one's sexual orientation is expressly prohibited by law, including patients subject to deprivation of liberty. Breach of the law can be appealed before the Agency of Regulation of Medical Activities. The latter is authorized to impose sanctions upon the medical professional, e.g. deprive one of her professional licence. In practice however these norms do not work effectively. Experts<sup>31</sup> and respondents noted that **medical professionals often violate these norms when working with LBT patients and show homophobic/transphobic attitude.** LBT persons often report that medical personnel display homophobic attitudes and often advise patients to undergo treatment against homosexuality. Primary reason for this is lack of knowledge about contemporary medical views on sexuality, etc. and that World Health Organization no longer views homosexuality as illness.

Neither the state action plans nor the state's current strategy on health-care issues, or researches conducted in the field take into consideration any specific needs of LGBT groups. There are no suicide prevention programmes in Georgia.

Until very recently blanket ban on blood donation by certain categories of individuals, including homosexuals, alcohol-edicts, sex-workers, etc. Such a blanket ban was inconsistent with the principles of equality, honor and dignity of individuals. The Constitutional Court of Georgia ruled on February 14, 2014

---

25 A Pending Case versus Georgia before the ECtHR about police homophobic behaviour and violation of fundamental rights ([Aghdgomelashvili and Japaridze v Georgia.](#), App. no. 7224/11)

26 <http://harriman.columbia.edu/event/address-his-excellency-irakli-garibashvili-prime-minister-georgia>

27 <http://www.assembly.coe.int/Main.asp?link=%2FDocuments%2FRecords%2F2013%2FE%2F1306271530E.htm>

28 The Law of Georgia on General Education. – art. 13(3)

29 Study on Homophobia, Transphobia and Discrimination on Grounds of Sexual Orientation and Gender Identity. Sociological Report: Georgia, COWI.2010. para.67.

30 Materials for preparation of CEDAW shadow report concerning LBT women's situation in Georgia. WISG. 2012.

31 Ibid.



in the Case of Asatiani et.al v. The Minister of Labour, Health and Social Protection, that this Order was unconstitutional<sup>32</sup>. The new Order has not been released by the Minister yet.

**Working with children and juveniles entails a number of significant problems.** One cannot work with LBT children without involvement or permission of their parents. Sexologists usually have the right to work with adults, but not children, so this issue who is authorized to work with them in this field needs to be regulated.<sup>33</sup>

**Georgian legislation neither prohibits gender reassignment surgery, nor regulates it.** This gives absolute discretion to medical institutions when deciding who is eligible for the gender reassignment surgery and on procedures applicable to the entire reassignment process. Such a gap can result in arbitrariness, lack of consistency and create obstacles for people willing to undergo the procedure. While gender reassignment services are available in Georgia, all the costs for the gender reassignment surgery have to be borne by the patient. (Whereas e.g., other medical procedures can be covered by various private and state-sponsored health insurance packages available in Georgia). Certain category of medical operations is funded or co-funded by the state based on the Decision of the Georgian Government No.77<sup>34</sup> (which approves State Healthcare Programmes for 2011). The main criteria for selecting which services fall under this category are the importance of the disease and low or special social status of the beneficiaries. **Gender reassignment surgery, despite its high social importance, is not included in this category of medical services**<sup>35</sup>. Considering the level of poverty and unemployment in Georgia, many may find gender reassignment procedures, which in total costs 19900 GEL, financially inaccessible<sup>36</sup>.

### **Discrimination at work and the right to housing**

*CEDAW Convention, Article 11, 13, 16 [1], [h], [Yogiakarta Principles, 12, 15]*

Labor Code of Georgia expressly prohibits discrimination based on sexual orientation and gender (the bases of prohibition do not include gender identity)<sup>37</sup>. Nevertheless, these legislative acts still contain flaws and/or lack strong implementation mechanisms and therefore cannot be effectively utilized to fight against LBT discrimination in practice. Some community members recalled that they were not employed because of their orientation, which was obvious based on their ways of dressing up.<sup>38</sup>

No information is available about restrictions or violations of housing rights due to one's sexual orientation, the reason might be the fact that LBT people usually do not disclose their status to the landlords or neighbors. It is a different type of a problem when LBT people are thrown out of their families and consequently – family houses by their family members. In such cases the house legally belongs to other member/s of the family, but it is common in Georgia for all members of the family to live together. However no state programme exists to offer them temporary accommodation or address this issue otherwise. **There exist a limited number of shelters for specific groups in Georgia (e.g., elderly people), not for L(G)BT persons however.**

### **Forced marriage and discrimination based on marital status**

*CEDAW Convention, Article 1, 2[f], 5[a], 16. [Yogiakarta Principles, 24]*

Economic dependence on parents plays an important role in the problem of forced marriages; this dependence forces young people to obey the will of the parents and behave as it is mandated by traditional mentality – get married. Unmarried women are subjected to social stigma, sometimes people get married to avoid being stigmatized.<sup>39</sup> No legal barriers exist for divorcing in case of forced marriages. If the person is not able to divorce for some reason, she can use the law on Domestic Violence to protect herself and her interests. However these mechanisms are rarely used in practice.

---

32 The Constitutional Court's decision #2/1/536

33 Materials for preparation of CEDAW shadow report concerning LBT women's situation in Georgia. WISG. 2012.

34 Georgia - national health care strategy 2011-2015 [http://www.healthrights.ge/wp-content/uploads/2012/05/jandacva\\_Eng.pdf](http://www.healthrights.ge/wp-content/uploads/2012/05/jandacva_Eng.pdf)

35 Monitoring of implementation of CM/REC(2010)5 in Georgia. p.111. WISG. Tbilisi. 2012.

36 Internal study on Transgender's Health Policy in Georgia. Identoba. 2012

37 The Labor Code of Georgia. Article2(3).

38 Materials for preparation of CEDAW shadow report concerning LBT women's situation in Georgia. WISG. 2012.

39 "A rather large part 58% of respondents believes that being in a bad marriage is better than being single. A statement shared by 70% of respondents emphasizes the importance of family in a woman's life: in general, it is believed that a married woman is happier than a single woman". Public perceptions of Gender equality in Politics and Business. UNDP. 2013

## Main Recommendations

- Ensure that transgender persons are able to obtain new documents (from any state and non-state entity ) reflecting their new gender identity through quick, transparency and accessible procedures;
- Ensure that gender reassignment procedure is regulated in such a way that transgender persons have access to medical treatment in line with international standards and that costs of such treatment is covered by the state;
- Train police in policing peaceful demonstrations of LGBT people, in line with OSCE Guidelines on Freedom of Peaceful Assembly; focus more attention on training police at preventing violence against peaceful demonstrators;
- Make sure that police abides by its ethics code which prohibits homophobic behavior. Use disciplinary and, if necessary, criminal law measures against those, who violate this code.
- Set up a special unit in the police which focuses on investigating crimes motivated by victim's sexual orientation/gender identity; this unit should closely cooperate with NGOs working on LGBT rights.
- State officials should publicly condemn violence against LGBT persons, so that violence is not further encouraged;
- Improve self-regulatory mechanisms and ethics codes of public entities.
- Adopt relevant changes to the Election Code, Law on Citizens' Political Associations and MPs' Ethics Codes;
- The Ministry of Education must conduct a study in cooperation with civil society, in particular those working on LGBT rights and related issues, to check whether textbooks promote tolerance and broad-mindedness or homophobia. In the latter case, the Ministry must address this issue in close cooperation with civil society representatives, particularly those working on LGBT rights and related issues.
- The Ministry of Education, in cooperation with relevant state agencies and civil society, must introduce programmes to ensure a truly inclusive educational system, e.g., consider inclusion of topics of sexual orientation and gender identity in the school curriculum and initial and in-service training programmes for educational staff, provision of psychological counseling for LGBT pupils, etc.