

Recommendations by the expert group initiative on the situation of the LGBTIQ+ community in Central Asia for the revision of the EBRD's Strategy for the Promotion of Gender Equality

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Introduction

Gender equality is an important aspect of the EBRD's strategy aimed at sustainable, fair, and inclusive development. However, in the rapidly evolving international context of sustainable development, human rights, and corporate accountability, there is a growing need for a more comprehensive approach to inclusion — one that addresses specific forms of discrimination and inequality related to sexual orientation, gender identity, expression, and sex characteristics (SOGIES).

The current EBRD's Strategy for the Promotion of Gender Equality 2021–2025¹ demonstrates a commitment to supporting women and girls, particularly in access to employment, entrepreneurship, and finance. However, it is limited by a binary approach to gender and does not address the vulnerabilities, risks, and structural barriers faced by LGBTIQ+ individuals. This creates a gap both in the conceptual framework of the strategy and in its practical implementation — including in the assessment of social risks, stakeholder engagement, project portfolio development, and compliance with the Bank's international obligations.

The lack of SOGIESC-related data in the strategy limits the EBRD's capacity in the following areas:

- Identifying and mitigating risks of discrimination in countries with high levels of legal and social stigma;
- Engaging and supporting vulnerable yet economically active groups often excluded from employment, credit, and participation programs;
- Aligning with international standards in human rights, sustainable development, and private sector accountability.

It is important to note that the EBRD's Environmental and Social Policy² (ESP, 2024) already recognizes LGBTIQ+ people as a vulnerable group in the context of social assessments, providing an institutional foundation for further integration of these principles into the gender equality strategy.

Incorporating SOGIESC into the strategy is not only a human rights imperative but also an opportunity for the Bank to demonstrate leadership, meet the ESG-driven expectations of international partners, and increase project resilience. The approach must be grounded in realism and contextual adaptability, especially in countries with high levels of stigma or criminalization.

This document offers a set of recommendations based on international standards and legal instruments³, the experience of other international financial institutions⁴ and analysis of regional contexts in Central Asian countries.

¹ EBRD, [Strategy for the Promotion of Gender Equality](#), EBRD, 2021

² EBRD, [Environmental and Social Policy 2024](#), EBRD, 2024

³ [Yogyakarta Principles](#), 2017

World Bank, [World Bank Gender Strategy 2024–2030](#), World Bank, 2024

Central Asia context: risks and opportunities

Central Asia is a region with varying legal and political environments, but in most countries, the rights of LGBTIQ+ people are either violated or not recognized at all⁵. This creates serious risks⁶ — both for individuals and for organizations implementing development projects.

In Uzbekistan and Turkmenistan, consensual same-sex relations between men are criminalized. People may be arrested, interrogated, or subjected to violence solely because of their sexuality. In Tajikistan and Kazakhstan, there are no laws that explicitly prohibit discrimination based on sexual orientation or gender identity. This means people can be denied employment, education, or medical care — and they have no legal recourse to defend their rights in court. In recent years, Kyrgyzstan has seen attempts to restrict the work of LGBTIQ+ organizations, including proposed laws targeting so-called “homosexual propaganda.”

UN human rights experts⁷ warn that in countries with such approaches, LGBTIQ+ individuals are especially vulnerable: they are excluded from access to public services and frequently become victims of violence, extortion, and police abuse.

For the EBRD, this situation means that many population groups — especially youth and LGBTIQ+ women — may be excluded from participating in projects unless their needs and risks are specifically addressed⁸. This may lead to the following issues:

- Projects aimed at gender inclusivity may fail to reach all those in need (e.g., transgender women may be unable to open a bank account or access employment due to documentation issues);
- Social risks may be underestimated if real threats to vulnerable groups are not included in the analysis;
- Reputational risks may arise — particularly in light of international expectations for companies and banks to respect human rights.

Despite these challenges, there is space for action in the region. Countries are increasingly focusing on social responsibility and environmental projects, creating an entry point to integrate human rights — including SOGIESC issues.

Digital technologies enable support for vulnerable groups even in restrictive environments — for example, through anonymous surveys, online consultations, and remote support services.

In Kazakhstan and Kyrgyzstan, initiatives are active that support young LGBTIQ+ people, offer educational programs, and provide legal consultations. These organizations may become strategic partners in EBRD projects focused on sustainable development, inclusion, and ESG.

Key gaps and limitations of the current EBRD Strategy for the Promotion of Gender Equality

The EBRD’s Strategy for the Promotion of Gender Equality 2021–2025 demonstrates a commitment to equality, yet its structure does not cover the full spectrum of vulnerable groups. In particular, the strategy overlooks the rights of LGBTIQ+ people and fails to provide tools for addressing specific risks in countries with high levels of discrimination. This limits the strategy’s potential as an effective instrument for implementing fair and inclusive development policies.

The strategy contains no references to sexual orientation and gender identity as factors of vulnerability, despite UN and other international recommendations to include LGBTIQ+ persons in equality strategies.

⁵ Human Rights Watch, [World Report 2025](#), *Human Rights Watch*, 2025

⁶ Freedom House, [Country Overview](#), *Freedom House*, 2025

⁷ UN, Report A/77/235 – [Protection from violence and discrimination based on SOGI](#), 2022

⁸ UN, [Guiding Principles on Business and Human Rights](#), *UN*, 2011

Without direct mention of LGBTIQ+ communities, Bank staff and local partners lack clear guidance for engaging with these groups. As a result, they are excluded from analysis, project design, and impact assessment. This omission also weakens the strategy's alignment with ESG standards and the UN Guiding Principles on Business and Human Rights.

In several countries — including Uzbekistan and Turkmenistan — consensual same-sex relations remain criminalized. In such environments, the EBRD strategy should include flexible engagement mechanisms with unregistered communities, use of anonymous consultation formats, and measures to ensure confidentiality and protection of beneficiaries.

Without such mechanisms, EBRD projects risk unintentionally exacerbating the marginalization and vulnerability of LGBTIQ+ individuals — or failing to reach them altogether. This also exposes the Bank to reputational risks.

Moreover, the strategy primarily considers only men and women, excluding other gender identities. This is inconsistent with modern approaches to vulnerability, which include transgender, non-binary, and intersex individuals.⁹

The strategy lacks references to the international standards such as the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)¹⁰; General Comments of the UN Human Rights Committee on the protection of LGBTIQ+ rights¹¹; the UN Guiding Principles on Business and Human Rights; the Sustainable Development Goals¹² (particularly SDGs 5, 10, and 16).

Overview of best practices: international approaches to SOGIESC inclusion

International financial institutions are demonstrating an evolution in their approaches to gender equality, moving from binary models toward broader and more inclusive strategies. Special attention is being given to integrating issues of sexual orientation, gender identity and expression, and sex characteristics (SOGIESC) into strategic planning, risk assessment, and project implementation. Below are key examples that may serve as benchmarks for the EBRD.

The World Bank's Gender Strategy¹³ 2024–2030 acknowledges the necessity to address the needs of LGBTIQ+ people within a broader concept of “gender diversity.” For the first time in the institution's history, the strategy explicitly states that LGBTIQ+ people experience systemic discrimination and must be recognized as a priority vulnerable group. Moreover, it underlines the need to include SOGIESC-specific indicators to assessment, monitoring, and impact tools.

The International Finance Corporation¹⁴ has developed private sector-focused practices to promote diversity and prevent discrimination. Key elements include employer guidance on implementing inclusive HR policies; case studies of companies that adopted SOGIESC-inclusive practices and saw positive economic outcomes; support for equal access to investment for LGBTIQ+ entrepreneurs.

The Asian Development Bank¹⁵ recognizes layered vulnerabilities and emphasizes the importance of including LGBTIQ+ people in strategic analysis and consultation processes. The Bank has introduced tools for analyzing discrimination and barriers to participation in development projects; dedicated SOGIESC

⁹ European Commission, [LGBTIQ Equality Strategy](#), European Commission, 2020

¹⁰ UN, [Convention on the Elimination of All Forms of Discrimination against Women](#), 1979

¹¹ UN Human Rights Committee, [General Comments](#)

¹² UN, [2030 Agenda for Sustainable Development](#), UN, 2015

¹³ World Bank Group, [World Bank Group Gender Strategy 2024-2030](#), World Bank Group, 2024

¹⁴ IFC, [Gender Equality and Economic Inclusion web page](#)

¹⁵ ADB, [Gender Equality and Social Inclusion \(GESI\) Framework](#), ADB, 2023

paragraphs in social and gender risk assessment manuals; mandatory assessment of potential negative impacts on marginalized groups.

The UNDP¹⁶ has launched the LGBTI Inclusion Index, used in development and inequality analyses across countries. The broader UN system also publishes thematic reports on SOGIESC-based discrimination, emphasizing mandatory participation of LGBTIQ+ organizations in decision-making processes; accountability of governments and donors for addressing structural discrimination; and the importance of anonymous and safe data collection methods.

The European Commission's LGBTIQ Equality Strategy 2020-2025¹⁷ reflects a comprehensive institutional approach to non-discrimination, including in development and external policy. The EU commits to ensure integration of SOGIESC considerations into budget planning and external aid programs; monitoring of country-level progress on the protection of LGBTIQ+ rights; and direct support to civil society in high-risk countries.

Best practices demonstrate that SOGIESC inclusion is not just a human rights issue — it is a key indicator of institutional effectiveness, sustainability, and social responsibility. Incorporating these dimensions strengthens institutional trust, reduces social risks, and contributes to the achievement of strategic sustainable development goals. The EBRD can adapt these approaches in a context-sensitive manner, aligned with its regional focus and institutional mandate.

Recommendations for the EBRD

Based on an analysis of the current EBRD gender strategy, international obligations (including the UN Guiding Principles on Business and Human Rights, CEDAW, and the SDGs), and best practices from the World Bank, European Commission, ADB, and IFC, the following system of recommendations is proposed. These measures aim to close key gaps and establish a sustainable, human rights-based approach to gender equality that addresses the needs of LGBTIQ+ people.

- Explicitly reference SOGIESC as factors that create risks of discrimination, poverty, exclusion, and violence, especially in criminalizing contexts.
- Establish an institutional objective to strengthen inclusion of vulnerable groups — including LGBTIQ+ individuals — as a mandatory component of EBRD projects on sustainable development and equality.
- Adopt a definition that encompasses gender diversity: men, women, transgender, non-binary, and intersex individuals, as reflected in the World Bank's 2024–2030 strategy.
- Reflect a departure from binary gender frameworks in EBRD policy by using gender-neutral and inclusive language regarding gender identity and expression.
- Enshrine commitments to the UN Guiding Principles on Business and Human Rights, the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), the Sustainable Development Goals (SDGs), the EU LGBTIQ Equality Strategy.
- Include mandatory SOGIESC components in project Environmental and Social Impact Assessments (ESIA) and ESG due diligence.
- Revise procurement procedures to emphasize non-discrimination and respect for LGBTIQ+ rights.
- Collect and analyze anonymized data on LGBTIQ+ inclusion in projects.
- Introduce success indicators that reflect the degree of inclusion and safety of LGBTIQ+ participants.
- Publish inclusion reports as part of the Bank's annual ESG disclosures.

¹⁶ UNDP, [LGBTI Inclusion Index](#), UNDP, 2024

¹⁷ European Commission, [LGBTIQ Equality Strategy 2020-2025](#), EU, 2020

- Establish formal cooperation agreements with LGBTIQ+ organizations and coalitions to implement joint programs on resilience, training, and inclusion.
- Incorporate participatory practices, as modeled in UNDP and European Commission strategies.
- Organize regular thematic consultations with LGBTIQ+ activists during project design and monitoring phases.
- Develop safe digital tools for the participation of community members from high-risk countries.

In countries where LGBTIQ+ individuals are at risk of criminal prosecution or are effectively excluded from social and economic life, the EBRD must introduce adapted, discreet, and human rights-oriented approaches. Below are specific measures that can help implement principles of inclusion under conditions of high vulnerability.

- The EBRD must ensure that funded projects do not exacerbate the situation of vulnerable groups. For example, when supporting digitalization projects, it is essential to include safeguards that prevent surveillance systems from being misused against LGBTIQ+ individuals. Environmental and social assessments should include risk analysis related to breaches of confidentiality and the development of protective measures.
- Consultations, surveys, and monitoring involving LGBTIQ+ participants should be conducted in safe settings — via trusted NGO partners, secure online formats, or confidential in-person meetings. All data related to vulnerable groups must be anonymized.
- Although direct funding of LGBTIQ+ initiatives may not be feasible, LGBTIQ+ individuals should be included in broader programs enabling LGBTIQ+ youth to access entrepreneurship programs via civil society organizations; considering the need for safe public spaces in infrastructure projects; integrating topics of diversity and non-discrimination into educational and vocational initiatives.
- The EBRD can coordinate with UN agencies, embassies, and foundations working in related fields (e.g., HIV/AIDS, women's rights, youth empowerment). For example, partnerships with UNAIDS or HIV service NGOs can facilitate the inclusion of LGBTIQ+ beneficiaries in educational or social programs. It is important to select partners with experience in handling confidential information and operating under pressure.
- Even in restrictive environments, it is crucial to implement safeguarding mechanisms by requiring partners to develop codes of conduct prohibiting discrimination and harassment and introduce anonymous and accessible grievance mechanisms, particularly in projects involving education, healthcare, and places of detention.
- In highly homophobic environments, public-facing campaigns can be dangerous. The EBRD should use neutral terminology and frame inclusion through the lens of economic opportunity. This type of argument may be perceived by authorities as pragmatic rather than ideological and thus provoke less resistance.
- Coordination with other international financial institutions and donors (e.g., the World Bank, ADB, EU) is a key strategy, particularly in the context of initiatives such as the EU's GSP+ scheme — where access depends on compliance with human rights standards. Joint promotion of human rights messages enhances their legitimacy and reduces political sensitivity.

Conclusion

This document and its set of recommendations highlight the urgent need for a comprehensive revision of the EBRD's current Strategy for the Promotion of Gender Equality to fully integrate issues of sexual orientation and gender identity (SOGIESC). Strengthening an inclusive approach is not only aligned with international human rights standards but also enhances the social resilience and reputational credibility of the Bank's projects. Integrating SOGIESC into the EBRD's strategy, institutional processes, and

programming will not only help mitigate risks and prevent harm but also amplify the positive societal impact of its operations.