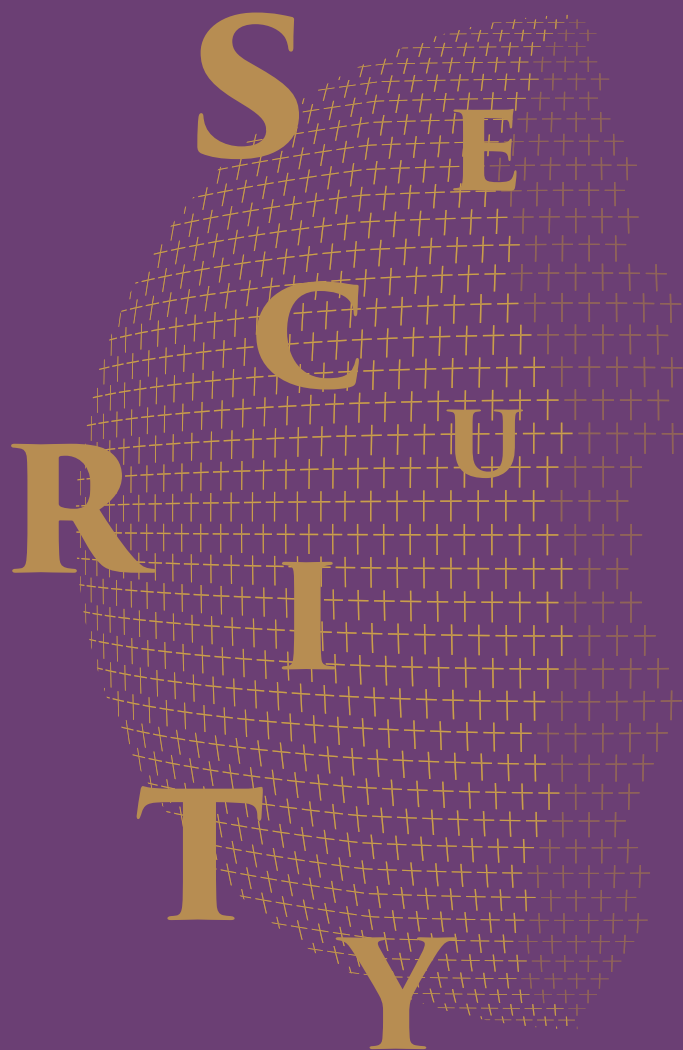


Understanding Anti-Christian Hate Crimes and Addressing the Security Needs of Christian Communities



A Practical Guide

OSCE
ODIHR

Understanding Anti-Christian Hate Crimes

Addressing the Security Needs of Christian Communities

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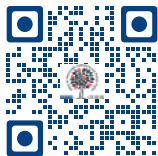
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This guide is part of a [series](#) of publications that address religion-related hate crime and the security needs of religious or belief communities.

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Foreword

In recent years, Christian communities across the OSCE region have faced anti-Christian hate incidents that range from graffiti and vandalism to threats, physical assaults and murder. Such incidents have targeted a wide range of Christian communities. These acts of hostility and violence inflict lasting trauma on victims, their families and their communities. If left unaddressed they can undermine the broader peace, security and stability of societies and the entire region. Each incident motivated by anti-Christian bias is not only an attack on individuals or property, but on the core values of religious freedom, dignity, mutual respect and equality that underpin a democratic society.

What makes this issue particularly urgent is how often religion-based hate crimes are downplayed, under-reported or politically overlooked. Any form of hatred based on religion or belief should be unequivocally condemned and treated with the same seriousness as any other hate crime. When society selectively acknowledges or minimizes religious hatred, it creates a dangerous precedent — one that emboldens intolerance and erodes the principle that all religions and beliefs deserve equal protection under the law. As with all forms of ‘othering’, anti-Christian bigotry threatens not only the safety of believers, but also the broader fabric of pluralistic, open and equal societies.

Addressing intolerance against religious hatred requires a comprehensive, cross-cutting and inclusive approach, because these acts are rarely isolated incidents; they are often symptoms of broader societal divisions, systemic prejudices and rising intolerance. Legal frameworks play a vital role in deterring and penalizing hate crimes, but legislation alone is insufficient. Education is equally essential in promoting mutual understanding, dispelling harmful stereotypes and nurturing a culture of respect from an early age. Interfaith dialogue can bridge divides between communities, encouraging empathy and solidarity across religious lines. Media responsibility, public awareness campaigns and support services for victims also contribute to building an inclusive environment where Christian communities, like all others, can feel secure and respected. A multifaceted strategy ensures that the root causes of intolerance are addressed in both preventative and responsive ways.

The OSCE’s Office for Democratic Institutions and Human Rights (ODIHR) is mandated to support participating States in their efforts to counter intolerance against Christians. OSCE participating States have repeatedly condemned and committed to addressing intolerance and discrimination based on religion or belief, including intolerance against Christians. The 2007 Madrid Ministerial Council Decision called on political representatives to strongly reject manifestations of intolerance against Christians. The 2013 Kyiv Ministerial Council Decision called on participating States to prevent intolerance,

violence and discrimination on the basis of religion or belief, including against Christians, and to adopt policies to promote respect and protection for places of worship.

This Guide is the latest in a series of ODIHR publications that address hate crime and the security needs of at-risk communities, including *Understanding Anti-Semitic Hate Crimes and Addressing the Security Needs of Jewish Communities* and *Understanding Anti-Muslim Hate Crimes and Addressing the Security Needs of Muslim Communities*. With this Guide, ODIHR offers a set of comprehensive recommendations to help participating States take practical steps to implement these commitments. In particular, the recommendations are designed to strengthen the cooperation between state authorities, including law enforcement, and Christian communities in order to address the communities' security concerns.

This Guide is the result of an extensive and inclusive consultation process with experts and representatives of OSCE participating States, civil society organizations and Christian communities. The development of the Guide was made possible thanks to financial contributions from Hungary, Italy and Poland.

Maria Telalian
ODIHR Director

Executive Summary

WHAT ARE THE CHALLENGES AHEAD?

Across the OSCE region, anti-Christian hate crimes target Christian women, men, boys and girls, as well as people or communities perceived to be Christian or associated with Christians. Christian institutions, including places of worship, cemeteries and monuments are also targeted in acts of anti-Christian violence and vandalism.

Crimes motivated by intolerance against Christians profoundly impact not just the victims of specific attacks, but also the daily lives of Christian people and communities in a range of ways. The impact of anti-Christian hate crimes and the related security challenges on expressing Christian identity and Christian religious practice, community and social life can include:

- Reluctance to participate in religious services, distribute religious literature, identify publicly as Christian, openly discuss their faith or wear religious clothing or Christian symbols;
- Hesitation to organize and promote religious festivals, celebrations and other events due to fear of potential attacks;
- Increased investment in security measures for their places of worship, which can strain the resources of Christian communities and divert funds from religious, cultural and social activities;
- Cancellation of events and/or closure of social initiatives run by Christian organizations due to repeated targeting of Christian-run institutions and events; and
- Self-isolation from broader society due to persistent security challenges and lack of institutional support, or — in extreme cases — relocation of the community in search of safety and freedom to practice their religion.

WHY IS THIS OF CONCERN TO PARTICIPATING STATES?

OSCE participating States have committed to recognize, record and report the anti-Christian bias motivation of hate crimes and have supported efforts by OSCE institutions to develop effective and comprehensive responses to hate crimes.

States have committed to take measures to “prevent intolerance, violence and discrimination on the basis of religion or belief, including against Christians” as well as to “[a]dopt policies to promote respect and protection for places of worship and religious sites, religious monuments, cemeteries and shrines against vandalism and destruction.”¹ Several Ministerial Council decisions have repeatedly reaffirmed the threat that hate crimes pose to the security of individuals and to social cohesion, as well as the potential for such crimes to lead to conflict and violence on a wider scale.²

WHAT CAN GOVERNMENTS DO?

Governments can take a range of measures to address the problem of anti-Christian hate crimes. They can:

- Acknowledge that anti-Christian hate crimes pose a serious threat not only to the security of individuals and communities but also more broadly to societal cohesion and security, requiring a prompt, coordinated and comprehensive response;
- Promptly and unequivocally condemn any anti-Christian hate crime and publicly express solidarity with the affected Christian communities;
- Develop comprehensive domestic education policies and strategies to address the root causes of intolerance against Christians;
- Implement awareness-raising campaigns and activities to strengthen understanding of intolerance against Christians;
- Promote, support and facilitate open and transparent interfaith and interreligious dialogue and partnerships in order to combat intolerance and discrimination on grounds of religion or belief, build relationships of openness and trust, and foster greater tolerance, mutual respect and understanding in society;
- Strengthen the collection, recording, sharing and analysis of data on anti-Christian hate crimes, including through legislation, policy development, improved recording mechanisms, training programmes, victimization surveys, data publication and ongoing evaluation.

1 OSCE Ministerial Council Decision No. 3/13, “Freedom of thought, conscience, religion or belief”, Kyiv, 9 December 2013.

2 See, among others, OSCE Ministerial Council Decision No. 6/02, “Tolerance and non-discrimination”, 7 December 2002; OSCE Ministerial Council Decision No. 12/04, “Tolerance and non-discrimination”, 7 December 2004; OSCE Ministerial Council Decision No. 10/05, “Tolerance and non-discrimination: promoting mutual respect and understanding”, Ljubljana, 6 December 2005; OSCE Ministerial Council Decision No. 13/06, “Combating intolerance and discrimination and promoting mutual respect and understanding”, Brussels, 6 December 2006; OSCE Ministerial Council Decision No. 10/07, “Tolerance and non-discrimination: promoting mutual respect”, Madrid, 3 December 2007.

- Cooperate with Christian communities and wider civil society to strengthen monitoring, recording and data sharing of hate crimes and hate incidents;
- Build trust with Christian communities by establishing two-way, open and transparent channels of communication and coordination;
- Support Christian communities in conducting risk assessments and implementing measures to strengthen their security and preparation for crises;
- Implement enhanced security and safety measures to protect Christian places of worship and other related facilities during periods of elevated risk; and
- Develop coherent and effective victim support systems in cooperation with civil society organizations to ensure that victims of anti-Christian hate crimes receive sensitive, respectful and comprehensive support.

Introduction

BACKGROUND

OSCE participating States (pSs) have agreed on a broad range of commitments to address intolerance and discrimination, including intolerance against Christians, and to uphold freedom of religion or belief and related human rights.³ In doing so, they underlined the need for a comprehensive and cross-cutting approach to effectively address various forms of intolerance and discrimination, while acknowledging their specificities and historical backgrounds. The OSCE Chair-in-Office (CiO) first mentioned intolerance against Christians in a high-level declaration emerging from the 2005 Cordoba Conference.⁴ This was followed by a number of OSCE Ministerial Council Decisions that sought to develop an OSCE-wide response for countering prejudice, intolerance and discrimination against Christians.⁵ In 2006, the OSCE Ministerial Council called upon the pSs to address the root causes of intolerance and discrimination “through increased awareness-raising measures that [...] [a]im to prevent intolerance and discrimination, including against Christians, Jews, Muslims and members of other religions”.⁶ In 2007, the Ministerial Council also called for “continued efforts by political representatives, including parliamentarians, strongly to reject and condemn manifestations of racism, xenophobia, anti-Semitism, discrimination and intolerance, including against Christians, Jews, Muslims and members of other religions.”⁷

“While underlining the importance of a comprehensive approach to address discrimination and hate crimes, to which the OSCE participating States commit, it is also necessary to acknowledge and understand the specificity of anti-Christian discrimination and hate crime. Addressing and combating anti-Christian discrimination and hate crime can only take place as part of a joint effort against all forms of intolerance

3 See, among others, OSCE Ministerial Council Decision No. 4/03, “Tolerance and Non-Discrimination”, Maastricht, 2 December 2003; OSCE Permanent Council Decision No. 621, “Tolerance and The Fight Against Racism, Xenophobia and Discrimination”, 29 July 2004; OSCE Ministerial Council Decision No. 10/05, “Tolerance and non-discrimination: promoting mutual respect and understanding”, Ljubljana, 6 December 2005; OSCE Ministerial Council Decision No. 13/06, “Combating intolerance and discrimination and promoting mutual respect and understanding”, Brussels, 6 December 2006; OSCE Ministerial Council Decision No. 10/07, “Tolerance and non-discrimination: promoting mutual respect”, Madrid, 3 December 2007; OSCE Ministerial Council Decision No. 3/13, “Freedom of thought, conscience, religion or belief”, Kyiv, 9 December 2013; and OSCE Ministerial Council Decision No. 08/14, “Declaration on Enhancing Efforts to Combat Anti-Semitism”, Basel, 5 December 2014.

4 Cordoba Declaration by the Chairman-in-Office, OSCE Conference on Anti-Semitism and on Other Forms of Intolerance, OSCE, 9 June 2005.

5 OSCE Ministerial Council Decision No. 10/05; OSCE Ministerial Council Decision No. 13/06; OSCE Ministerial Council Decision No. 10/07; and OSCE Ministerial Council Decision No. 08/14.

6 OSCE Ministerial Council, Decision No. 13/06.

7 OSCE Ministerial Council Decision No. 10/07.

and discrimination, to work together towards inclusive and democratic societies that are based on human rights; where the diversity of different cultures, ethnicities, faiths and beliefs is also valued and recognized. At the same time, it is necessary to increase awareness of anti-Christian discrimination and hate crime and foster research, understanding in how to combat this in the OSCE region.”

— Dr. Regina Polak, Full Professor of Practical Theology and Interreligious Dialogue at the University of Vienna and former Personal Representative of the OSCE Chairperson-in-Office on Combating Racism, Xenophobia and Discrimination, also focusing on Intolerance and Discrimination against Christians and Members of Other Religions⁸

Countering anti-Christian hate crimes is a key element of the tolerance and non-discrimination work of the OSCE Office for Democratic Institutions and Human Rights (ODIHR), in line with OSCE commitments. ODIHR works with national authorities to strengthen their capacity to identify, record, investigate and prosecute hate crimes and to support hate crime victims. In parallel, ODIHR works with civil society organizations and religious or belief communities to enable them to monitor and report on hate crimes, including through specialized training on addressing hate crimes motivated by anti-Christian bias.⁹ By advancing freedom of religion or belief for all, ODIHR also contributes to creating environments in which religious tolerance and respect for religious or belief diversity flourishes, including for Christians.

ODIHR has included discussions on intolerance against Christians and members of other religions in several meetings on the OSCE human dimension¹⁰ and has also convened a number of international events on this topic, for example, the Conference on Combating Intolerance and Discrimination against Christians, organized in Vienna in 2016 by the German OSCE Chairmanship and ODIHR¹¹ and the international expert meeting organized by ODIHR in Geneva in 2019 on Addressing Intolerance, Discrimination and Hate Crime: Responses of Civil Society and Christian and Other Religious Communities.¹² To further raise awareness of the nature of anti-Christian hate crimes and their impact on individuals and communities, in 2018 ODIHR published the *Anti-Christian Hate*

8 Opening Remarks, OSCE/ODIHR consultation meeting on anti-Christian hate crimes, Vienna, 30 October 2023.

9 In January 2021 and March 2022, ODIHR organized an online Training for Civil Society on Addressing Anti-Christian Hate Crime.

10 See for instance the Supplementary Human Dimension Meetings on Upholding the Principles of Tolerance and Non-Discrimination, including in the Promotion and Protection of Freedom of Religion or Belief, 1-2 April 2019; Freedom of Religion or Belief: Issues, Opportunities, and the Specific Challenges of Combatting Anti-Semitism and Intolerance and Discrimination Against Christians, Muslims and Members of Other Religions, 22-23 June 2017; and Policies and Strategies to Further Promote Tolerance and Non-Discrimination, 14-15 April 2016.

11 See: Security needs, effective responses to intolerance and hate crimes against Christians discussed at OSCE/ODIHR event in Vienna, 14 December 2016. Other high-level events on this topic include the High-Level Meeting on Preventing and Responding to Hate Incidents and Crimes against Christians, Rome, 12 September 2011; and Intolerance and Discrimination against Christians: Focusing on Exclusion, Marginalization and Denial of Rights, Vienna, 4 March 2009.

12 Addressing Intolerance, Discrimination and Hate Crime: Responses of Civil Society and Christian and Other Religious Communities: Expert Meeting, OSCE/ODIHR, 22-23 October 2019.

Crime factsheet, available in English, Russian, Bosnian, German, Italian, Spanish and Ukrainian.¹³

WHY IS THIS GUIDE NECESSARY?

Anti-Christian hate crimes — criminal offences motivated by bias against Christians — are an extreme manifestation of intolerance that send a harmful message of exclusion to victims and their communities. According to reports received by ODIHR, anti-Christian hate crimes continue to pose a serious concern across the OSCE region.¹⁴ These acts of hostility and violence, if left unaddressed, extend far beyond harm to individual victims or communities. They threaten the fabric of social cohesion, erode the foundations of peaceful coexistence and undermine the broader peace, security and stability of entire societies.

To address this urgent challenge, this Guide sets out to increase understanding of anti-Christian hate crimes and the importance of ensuring the security needs of Christian communities.

WHAT IS THE SCOPE AND PURPOSE OF THE GUIDE?

The Guide discusses the contexts in which anti-Christian hate crimes take place, highlights the main features and impact of anti-Christian hate crimes, and gives guidance to pSs on how to strengthen their efforts to address such crimes in cooperation with other actors, in particular with the affected communities themselves. It promotes a victim-centred, gender-mainstreamed and intersectional approach to address anti-Christian hate crimes effectively and comprehensively. The Guide also sets out a number of practical measures that can be taken by those responsible for addressing anti-Christian hate crimes and ensuring the security needs of Christian communities. Primarily, these are government officials, including policy- and decision-makers, law enforcement and political representatives, but it is hoped that Christian communities, other religious or belief communities, wider civil society and the broader public will also find the recommendations in this Guide useful.

The main objectives of this Guide are to:

- **Raise awareness** about the nature, prevalence and impact of anti-Christian hate crimes and the security concerns of Christian communities in the OSCE region, as well as of how bias against Christians intersects with other bias motivations;

¹³ The factsheet is available at: [Anti-Christian Hate Crime](#), OSCE/ODIHR, 31 July 2018.

¹⁴ For more information, see the section on “Anti-Christian hate crimes in the OSCE region: context” below and [Anti-Christian hate crime \(2023\)](#) in the annual OSCE/ODIHR Hate Crime Report.

- **Assist** government actors, including policy- and decision-makers, law enforcement and political representatives in OSCE pSs to recognize, record and effectively address anti-Christian hate crimes and provide security to Christian communities;
- **Promote dialogue, collaboration and the sharing of best practices** between government authorities (including law enforcement), members of Christian communities, and wider civil society, with the aim of addressing anti-Christian hate crimes and improving the security of these communities; and
- **Support civil society** efforts to address anti-Christian hate crimes and the security of Christian communities.

For the purpose of this Guide, anti-Christian hate crimes are understood — in line with the OSCE understanding of hate crime — as a criminal offence committed with a bias motivation. Therefore, this Guide does not cover anti-Christian discrimination or possible violations of the freedom of religion or belief of Christians that do not relate to matters of hate crime and security.¹⁵ Moreover, this Guide is intended to address the security needs of individuals, groups and communities who identify as Christian, even if they are not recognized as such by the authorities and/or other Christian communities.¹⁶ This does not imply any judgement by ODIHR on the “level of cogency, seriousness, cohesion and importance”¹⁷ of the religious or belief communities named in the Guide.

HOW WAS THIS GUIDE DEVELOPED?

In line with its comprehensive approach to addressing all forms of intolerance, discrimination and hate, including that based on religion or belief, this Guide is the latest in a series of publications that address religion-related hate crime and the security needs of religious

15 The UN Special Rapporteur on Freedom of Religion or Belief has found that violations of the freedom of religion or belief can be caused by “societal and political factors, such as interference by control-obsessed authoritarian Governments, the utilization of religions for defining a homogeneous understanding of national identity, loss of trust in public institutions and concomitant processes of societal fragmentation, the prevalence of a ‘macho culture’, economic and social disparities, widening power gaps between different groups within a society and other variables”. See the *Interim Report of the Special Rapporteur on freedom of religion or belief*, 2 August 2016, A/71/269, para. 24.

16 This is in line with the principle of self-identification. The right to freedom of thought, conscience, religion or belief which protects the freedom to have or to adopt a religion or belief of one’s choice (ICCPR, Article 18, and ECHR, Article 9) should be “broadly construed” to apply not only “traditional religions or to religions and beliefs with institutional characteristics or practices analogous to those of traditional religions”, but also to “newly established” religions or beliefs and to “religious minorities that may be the subject of hostility on the part of a predominant religious community” (CCPR General Comment No. 22: Article 18 (Freedom of Thought, Conscience or Religion), CCPR/C/21/Rev.1/Add.4, 30 July 1993, para. 2). It is essential that the State recognizes the right for individuals to self-identify as belonging to a religious or belief community, independently of its status as an officially recognized group or a religious minority (Recommendations of the Forum on Minority Issues at its sixth session: Guaranteeing the rights of religious minorities, A/HRC/25/66, 22 January 2014, para. 7). Thus, according to the principle of self-identification, religion or belief as a personal identity characteristic should be assigned through self-identification, not through imputation or inference by an external party (OHCHR, *A Human Rights-Based Approach to Data. Leaving no one Behind in the 2030 Agenda for Sustainable Development*, 2018, pp. 12–13).

17 *Campbell and Cosans v the United Kingdom*, ECtHR, 23 March 1983.

or belief communities, following the 2017 publication, *Understanding Anti-Semitic Hate Crimes and Addressing the Security Needs of Jewish Communities: A Practical Guide*¹⁸ and the 2020 publication, *Understanding Anti-Muslim Hate Crimes and Addressing the Security Needs of Muslim Communities: A Practical Guide*.¹⁹ This publication should be read together with these Guides, as well as with ODIHR's policy guidance on *Freedom of Religion or Belief and Security*.²⁰

This Guide is the result of an extensive and inclusive consultation process, in-person and online, which involved international and national experts, and representatives of pSs, civil society organizations and Christian communities. This included an event with OSCE pS representatives in Vienna (October 2023) and consultations with experts, representatives of civil society and Christian communities in Warsaw (November 2023), Yerevan (February 2024) and Ottawa (May 2024). ODIHR also offered pSs the opportunity to submit written contributions, data and recommendations on addressing anti-Christian hate crimes. A consultation meeting with experts to review the draft of this Guide was organized in Warsaw in November 2024. In total, some 114 individuals (57 men, 57 women) contributed to the development of this publication.

HOW IS THE GUIDE STRUCTURED?

Part One describes the context in which anti-Christian hate crimes take place, and the underlying prejudice and narratives shaping environments in which criminal manifestations of intolerance may arise. It also provides a non-exhaustive overview of the key features of anti-Christian hate crimes, including potential bias indicators and types of anti-Christian hate crimes. Finally, it describes the impact that anti-Christian hate crimes may have on Christian individuals and communities. All examples in text boxes are taken from ODIHR's Hate Crime Report, unless otherwise specified.

Part Two presents an overview of the OSCE commitments on intolerance against Christians and hate crime, as well as international standards on addressing intolerance against Christians. It also describes the principles that should underpin legislation, policies and initiatives designed to tackle anti-Christian hate crimes.

Part Three lists seven practical steps that governments can take to address anti-Christian hate crimes and provide security for Christian communities.

Part Four suggests activities for stakeholders, such as government officials, law enforcement, religious or belief communities and civil society, to respond effectively to the security concerns facing Christian communities.

18 *Understanding Anti-Semitic Hate Crimes and Addressing the Security Needs of Jewish Communities: A Practical Guide*, OSCE/ODIHR, 15 May 2017.

19 *Understanding Anti-Muslim Hate Crimes – Addressing the Security Needs of Muslim Communities: A Practical Guide*, OSCE/ODIHR, 15 May 2020.

20 *Freedom of Religion or Belief and Security: Policy Guidance*, OSCE/ODIHR, 9 September 2019.

The annexes provide supplementary information to assist stakeholders in addressing anti-Christian hate crimes. **Annexe 1** presents case studies that may be useful to government officials, including law enforcement and others, for identifying bias indicators in anti-Christian hate crimes. **Annexe 2** provides information on the main doctrines, teachings, traditions and celebrations of Christianity, tailored to meet the needs of law enforcement officials.

PART ONE:
**Understanding the Challenge
of Anti-Christian Hate Crimes**

This section discusses the context, key features and impact of anti-Christian hate crimes in the OSCE region. Unless another source is cited, all examples in this section refer to anti-Christian hate incidents reported by civil society to ODIHR.²¹ Since anti-Christian hate crimes — like all hate crimes — are under-reported, the information given here should not be regarded as a comprehensive or definitive account of their prevalence or scope; they merely reflect the incidents reported to ODIHR.

I. Anti-Christian hate crimes in the OSCE region: context

A hate crime is a criminal offence committed with a bias motivation. Hate crimes are comprised of two elements. The first is that the act committed is a crime. The second is that the perpetrator must commit the criminal act with a particular motive — a bias. This bias motive of the perpetrator distinguishes hate crimes from ordinary crimes. In practice, the bias motive means that:²²

- The perpetrator intentionally chose the target of the crime because of some protected characteristic (discriminatory selection of the target); or
- Before, during or after committing a crime, the perpetrator expressed hostility towards the protected characteristics of the targeted person, group or property (the crime was aggravated by hostility).

Acts of violence or threats against individuals based on their actual or perceived Christian identity, as well as attacks on people or property associated with Christian individuals or communities, are categorized as anti-Christian hate crimes. Such crimes could include murder, acts of intimidation, threats, property damage, physical assaults, arson, robbery or any other criminal offence committed due to anti-Christian bias.

Anti-Christian hate crimes are different from but sometimes closely related to criminalized ‘hate speech’, which refers to incitement to hatred or violence based on a protected characteristic that is criminalized in national legislation. While the starting point for identifying hate crime is that a criminal offence has been committed with a possible bias motivation, the usual starting point for classifying criminalized ‘hate speech’ offences

21 Anti-Christian hate crime (2023), OSCE/ODIHR Hate Crime Report.

22 Hate Crime Laws: A Practical Guide. Revised Edition, OSCE/ODIHR, 23 September 2022, pp. 15 and 58.

is the clear presence of bias towards a protected characteristic in the content of a public expression that might constitute a crime.²³

Since ODIHR began reporting on anti-Christian hate crimes in 2016, the Office has consistently received reports of incidents in more than 30 OSCE pSs. These have affected both majority and minority²⁴ Christian communities in a range of contexts. Anti-Christian hate incidents reported to ODIHR range from graffiti and vandalism to harassment, threats, physical assaults and murder. Attacks on Christian places of worship, sites, monuments and other facilities constitute the majority of the reported incidents. It should be noted that ODIHR has received more reports of threats and physical violence in states where Christian communities constitute a minority, while attacks on Christian places of worship, sites, monuments and other facilities are reported in higher numbers in states where Christians form the majority.²⁵

While the data provides important indicators of security risks and the overall climate of intolerance in a society, it must be interpreted with care. Given the under-reporting by victims and under-recording by law enforcement, it is not possible to present a complete picture of the prevalence and scope of hate crime, including anti-Christian hate crimes, across the OSCE region. For example, low reporting of anti-Christian hate crimes by victims may be due to shame, denial, mistrust in the police or fear of retaliation.²⁶ Moreover, civil society faces numerous challenges in recording and reporting anti-Christian incidents, including lack of resources, lack of effective coordination mechanisms with law enforcement and shrinking space for independent action. In addition, law enforcement officers may not have the necessary recording mechanisms or fail to recognize that a crime is an anti-Christian hate crime.²⁷ Consequently, it is not possible to draw definitive conclusions about the extent of anti-Christian hate crimes in the OSCE region from the information reported to ODIHR, nor how it compares to other bias-motivated crimes, including those based on religion or belief.

It is crucial to acknowledge that Christians are not a homogeneous group; Christian communities across the OSCE region are very different in their presence, beliefs, practices and perceptions. Various Christian denominations coexist in many pSs, with some — particularly minority Christian communities — facing persistent intolerance, discrimination and hate crimes. These forms of hostility are often rooted in historical narratives and stereotypes about Christians, which are intertwined with narrow notions

23 Hate Crime Prosecution at the Intersection of Hate Crime and Criminalized 'Hate Speech'. A Practical Guide, OSCE/ODIHR, 15 November 2024, pp. 17-19.

24 "[A] religious [...] minority is any group of persons which constitutes less than half of the population in the entire territory of a State whose members share common characteristics of [...] religion. About minorities and human rights. Special Rapporteur on minority issues, Office of the United Nations High Commissioner for Human Rights.

25 Anti-Christian hate crime (2023), OSCE/ODIHR Hate Crime Report.

26 Preventing and responding to hate crimes: A resource guide for NGOs in the OSCE region, OSCE/ODIHR, OSCE/ODIHR, 15 October 2009, pp. 34-35.

27 Hate Crime Data Collection and Monitoring: A Practical Guide, OSCE/ODIHR, 29 September 2014, p. 11.

of national unity, accusations of disloyalty to the state and rejection of dominant societal values.²⁸ These narratives, shaped and informed by a complex mix of political, cultural, historical and social factors, shed light on the persistence and complexity of contemporary anti-Christian sentiment. Given the differing national contexts and diversity of Christian communities, it is impossible to generalize about the main features of anti-Christian hate crimes in the OSCE region.

Recent challenges in the OSCE region — including interstate conflicts, political tensions and economic instability — may exacerbate communities' vulnerability to hate crime by creating a permissive environment for intolerance. Furthermore, inadequate protection of the rule of law, human rights and the principles of equality and non-discrimination also propagate hate crimes. As observed by the United Nations Special Rapporteur on Freedom of Religion or Belief:

“... widespread human rights abuses against religious and belief minorities foster permissive environments wherein respect for religious and belief minorities is diminished to the extent that hostility and violence towards such groups is legitimized. Violence in such contexts may be perpetrated by State and non-State actors, and, at times, with the implicit consent of States, especially where perpetrators enjoy impunity.”²⁹

Likewise, the UN Human Rights Council has expressed deep concern over the negative stereotyping and stigmatization of religious or belief communities and individuals, particularly when condoned by governments.³⁰ Therefore, addressing anti-Christian hate crimes and the security needs of Christian communities requires a thorough recognition and understanding of the intersecting social, political, legal, religious and cultural contexts of a given country, alongside awareness of the challenges these contexts pose for Christian individuals and communities.

In addition, in recent years, the rise of online technologies, social media and the use of artificial intelligence (AI) has fuelled the proliferation of various forms of online intolerance and discrimination, which can lead to hate crimes, including anti-Christian hate crimes. The Office of the OSCE Representative on Freedom of the Media has highlighted that online platforms pose challenges to accessing reliable information, because they “prioritize engagement for advertising profit over accuracy, diversity, and the public interest”.³¹ Social media platforms can contribute to the rise of discrimination, hostility, violence, conspiracy theories and scapegoating, amplifying social tensions based on

28 A/HRC/55/47 Report of the UN Special Rapporteur on Freedom of Religion or Belief Hatred on the Basis of Religion or Belief, Report of the Special Rapporteur on freedom of religion or belief, Nazila Ghanea, United Nations General Assembly, 8 January 2024, para. 10.

29 A/75/385 Interim report of the Special Rapporteur on freedom of religion or belief, Ahmed Shaheed. Elimination of all forms of religious intolerance, United Nations General Assembly, 12 October 2020, para. 30.

30 A/HRC/RES/16/18, Combating intolerance, negative stereotyping and stigmatization of, and discrimination, incitement to violence and violence against, persons based on religion or belief, United Nations General Assembly, 12 April 2011, para. 1.

31 Media and Big Tech Initiative, OSCE/RFoM, 2024.

religion or belief. The digital space has become a breeding ground for misinformation and hatred, including ideological and identity-based disinformation aimed at inciting discrimination and violence against religious or belief communities.³² Additionally, generative AI technologies, such as social media bots, are being exploited by groups seeking to foster division and intolerance, distorting political discourse and misrepresenting public opinion.³³

CONTEXTS THAT CAN CONTRIBUTE TO ANTI-CHRISTIAN HATE CRIMES

Christian communities may be targeted because they are perceived as posing a danger to national identity and peaceful coexistence. In some OSCE pSs, some religious or belief communities are at times perceived as opposing or threatening mainstream societal values and norms, as well as narrowly-defined notions of national identity, potentially endangering the peace and security of the state.³⁴ Prejudicial and stereotypical information about some groups can amplify the risks of religious hatred.³⁵ In some cases, political discourse and narratives have helped to perpetuate anti-Christian bias and stereotypes in the public sphere, for instance, by referring to minority Christian denominations as ‘sects’ or ‘cults’, sometimes with negative epithets, such as ‘dangerous’, ‘destructive’, ‘extremist’ or ‘totalitarian’. The European Court of Human Rights considers this to be hostile language that violates Article 9 of the European Convention.³⁶ Some governments have responded by denying registration to some religious or belief communities or revoking it once granted, or by enacting more restrictive registration laws and requiring formerly registered communities to re-register.³⁷ Christian communities that are unable to register or maintain legal personality status³⁸ can face increased social marginalization and vulnerability to hate crime, with the added risk that such crimes might not be registered as anti-Christian hate crimes due to the lack of legal recognition. Furthermore, negative stereotypes and suspicion towards newly-established Christian communities may intensify when these groups host foreign missionaries or maintain ties

32 A/HRC/40/58 Report of the Special Rapporteur on freedom of religion or belief, United Nations General Assembly, 5 March 2019, paras. 50 and 52, and A/HRC/47/25 Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, United Nations General Assembly, 13 April 2021, paras. 16 and 26.

33 A/HRC/44/57 Report of the Special Rapporteur on contemporary forms of racism, racial discrimination, xenophobia and related intolerance. Racial discrimination and emerging digital technologies: a human rights analysis, United Nations General Assembly, 18 June 2020, para. 24.

34 OSCE/ODIHR, FoRB Security Guide, p. 29.

35 UNGA, A/HRC/44/57, para. 52.

36 *Leela Förderkreis e.V. and Others v. Germany*, Application no. 58911/00, ECtHR, 6 November 2008, *Centre of Societies for Krishna Consciousness In Russia and Frolov v. Russia*, Application no. 37477/11, ECtHR, 23 November 2021 and *Tonchev and Others v. Bulgaria*, Application no. 56862/15, ECtHR, 13 December 2022.

37 OSCE/ODIHR, FoRB Security Guide, p. 29.

38 For more information, see *Guidelines on the Legal Personality of Religious or Belief Communities*, OSCE/ODIHR, 4 February 2015.

outside the country, including with international parent organizations. State responses to such cases have included the expulsion of foreign missionaries.³⁹

Austria, 9 May 2023. A Christian missionary who regularly distributes Bibles to the public was repeatedly threatened and subjected to anti-Christian insults in a Muslim-majority neighbourhood in Vienna. The stall displayed posters reading, “Jesus says: I am the way, and the truth, and the life (John 14:6)”. His book stall was surrounded and attacked by a mob, and his Bibles were stolen. The victim heard the perpetrators say, “Christ is not God”. He had previously been threatened by a mob at the same location, when a man pointed at him and made gestures symbolizing that his neck would be cut.

Spain, 17 November 2022. While engaging in religious activities in the street, three Jehovah’s Witnesses — two women and one man — were approached by a man who identified himself as Catholic and asked to look at the victims’ religious literature. He then tore up the religious literature, insulted the group and repeatedly threatened to break their heads. The perpetrator finally punched the male Jehovah’s Witness in the chest, resulting in injuries that required medical treatment.

Türkiye, 18 December 2023. Over the telephone, the pastor of a Protestant church in Istanbul was threatened and then told to evacuate the church. Shortly after, the church’s signboard was damaged with knives and the church’s nameplate was destroyed. This was one in a series of threats targeting the church.

These examples are taken from ODIHR’s Hate Crime Report

Tensions between Christian communities can be another factor driving anti-Christian hate crimes. Hostility or conflict within the same, broader, religious or cultural community can arise for various reasons, including historical rivalries, political alliances, differences in interpretation, doctrine or practice, and tensions can manifest in various ways. Furthermore, numerically smaller or less-established Christian communities (e.g., Jehovah’s Witnesses or the Church of Jesus Christ of Latter-day Saints) may face discrimination or violence from larger, more dominant or better-established Christian communities, especially if they are new to the region or country, or their practices or beliefs are deemed ‘heretical’ or ‘unorthodox’.⁴⁰

³⁹ *Ibid.*, p. 64.

⁴⁰ For example, Jehovah’s Witnesses are banned in 34 countries. See UNGA, A/75/385, para. 24.

Georgia, 12 October 2023. Female Jehovah's Witnesses were threatened and subjected to an attempted physical assault by a man uttering insults related to their religious activities in the street. The perpetrator recited Orthodox prayers and kicked and damaged the victims' cart containing religious literature. The incident was reported to the police and the perpetrator received a fine.

Ukraine, 17 October 2024. A monk was seriously injured during a violent assault on the Ukrainian Orthodox Church cathedral in Cherkasy carried out by members of the Orthodox Church of Ukraine. The monk had to undergo multiple surgeries before being able to walk again. The attack was condemned by representatives of various local churches.⁴¹

Unless indicated otherwise, these examples are taken from ODIHR's Hate Crime Report

Tensions between Christian and non-Christian religious or belief communities, often driven by a mix of ideological, political and historical factors, have also contributed to anti-Christian hate crimes. During armed conflicts and other security crises, both state and non-state actors may target religious or belief minorities or exploit religious identities to advance their agendas, even when religion is not a direct factor. In such contexts, acts of vandalism and religious harassment may also be used as tactics of armed conflict. For Christian communities, this has led to the destruction of places of worship, desecration of cemeteries and threats and violence against clergy and believers. These actions can reinforce existing inequalities based on religion or belief, as well as intersecting characteristics such as ethnicity, nationality and gender.⁴² Religion-related or religion-inspired violence may also stem from the perception of Christianity as a rival, inferior or adversarial faith — often framed within violent 'extremist'⁴³ narratives, historical grievances and geopolitical tensions. For example, some forms of violent 'extremist' rhetoric portray Christians as 'infidels' and 'enemies of Islam' who must be subdued.⁴⁴

41 Monk still Unable to Walk after Brutal Attack on Cherkasy Cathedral, Orthodox Christianity, 14 November 2024. In Ukraine, the Orthodox Christians are split between the Ukrainian Orthodox Church — which is traditionally allied with the Russian Orthodox Church in Moscow — and the independent Orthodox Church of Ukraine. In 2024, Ukraine passed a law banning religious organizations with links to Russia, targeting mainly the Ukrainian Orthodox Church. See *Ukraine's Ban on Moscow-Linked Church Will Have Far-Reaching Consequences*, Carnegie Endowment for International Peace, 4 September 2024.

42 A/HRC/49/44 Rights of persons belonging to religious or belief minorities in situations of conflict or insecurity. Report of the Special Rapporteur on freedom of religion or belief, Ahmed Shaheed, United Nations General Assembly, 3 June 2022, paras. 16, 19 and 71.

43 'Extremism' is an imprecise term without a generally accepted definition, which leaves it open to overly broad and vague interpretations and opens the door to arbitrary application of the law. In line with OSCE commitments, terrorism and violent extremism cannot and should not be associated with any 'race', ethnicity, nationality or religion. OSCE/ODIHR, *FoRB Security Guide*, p. 31.

44 The so-called 'Islamic State' targeted non-Muslims, including Christians and Yazidis. On ideological foundations and destruction see Paul Burke, *Global Jihadist Terrorism*, (Cheltenham UK and Northampton USA: Edward Elgar Publishing, 2021).

France, 7 February 2023. Several priests in Paris were subjected to death threats on the same day by a man linked to an Islamist violent extremist group. A staff member from the Saint-Sulpice church alerted the authorities about the perpetrator. It was also reported that the man had threatened a priest in the Saint-Germain-des-Prés parish. During the investigation by the Paris judicial police, it was revealed that the man was known to them and had been flagged as a potential threat to national security.

Kosovo*, 14 May 2024. The Serbian Orthodox Church near the city of Pejë/Peć was desecrated after individuals broke into and vandalized the church with graffiti, including messages such as ‘Allahu Akbar’ and ‘remove this church from here, there are only Muslims here!’ This incident followed the decision by the Kosovo authorities to prohibit the Patriarch and bishops of the Serbian Orthodox Church from entering the country.⁴⁵

Spain, 25 January 2023. A man murdered an altar server, injured a priest and stabbed three others with a machete while shouting anti-Christian insults in two Catholic churches in Algeciras following the evening mass. During the attacks, the perpetrator also destroyed religious objects. The priest was hospitalized with serious neck injuries. The police noted that the perpetrator was known to them as he was awaiting deportation. In its ruling, the Spanish High Court confirmed that the attack could be classified as a ‘directed jihadist attack’.

Türkiye, 28 January 2024. Two gunmen attacked a Catholic church in Istanbul, causing panic during morning mass and killing one man. In the indictment, the arrested suspects are referred to as members of the so-called ‘Islamic State’.⁴⁶

Unless indicated otherwise, these examples are taken from ODIHR’s Hate Crime Report

The situation of individuals who convert to Christianity presents unique challenges and vulnerabilities. People who convert to Christianity can face distinct forms of hostility, including hate crimes. The prevalence of such intolerance may depend on the societal norms and the overall political and cultural context. Women who embrace Christianity can be especially at risk of being punished by their families once their new faith is discovered, including through physical violence and threats. Assault and violence from family members typically remain hidden, because victims are afraid of speaking out, thus significantly weakening access to justice and victim support.⁴⁷ Similar forms of hostility may be experienced by Christians who leave one Christian denomination and convert to another, or who leave Christianity altogether.

* All references to Kosovo, whether to the territory, institutions or population, in this text should be understood in full compliance with United Nations Security Council Resolution 1244.

45 The Serbian Orthodox Church near Peć Desecrated, statement by Serbian Orthodox Church Diocese of Raška-Prizren, 14 May 2024.

46 Turkey arrests suspected Istanbul church attack planner linked to Islamic State, Reuters, 14 September 2024.

47 The Persecution of Christian Women and Girls, Open Doors, 2022, pp. 6 and 13.

Kazakhstan, 30 June 2021. A Jehovah's Witness woman in Shymkent was threatened with a knife and repeatedly beaten and throttled by her husband at home due to her religion. She was then abducted and taken to a mosque to undergo a forced religious conversion. Upon learning the victim's religion, the police refused to take action.

Uzbekistan, 7 May 2021. A Jehovah's Witness woman in Qarshi was beaten by her husband for studying the Bible and teaching it to her children. The victim sustained a ruptured eardrum.

These examples are taken from ODIHR's Hate Crime Report

Conscience-based positions held by some Christians can make them vulnerable to hate crime. Conscience-based positions held by some Christians on certain social, cultural and political issues can make them targets of hate crimes — especially in societies where these issues are highly contentious and polarizing. Issues may include gender identity, LGBTI rights, abortion, conscientious objection to military service or the use of arms, and the refusal to salute the national flag or sing the national anthem.

Iceland, 25 July 2022. A rainbow flag painted in front of Grafarvogur Church was vandalized when an unknown perpetrator scrawled "LEVITICUS 20:13" on the flag, which is a reference to a passage in the Bible that says, "If a man lies with a male as with a woman, they both commit an abomination. They shall both be put to death. The guilt of their blood shall come upon them." The church condemned the vandalism, stating, "We in Grafarvogur Church prefer to follow the message of Jesus Christ, who told us to love one another. We believe that every person is a beloved creation of God who is allowed to live the life he/she was created for." This was one incident in a pattern of repeated attacks at the church.

Tajikistan, January 2020. A male Jehovah's Witness conscientious objector was held in a military unit near Dushanbe pending trial, as he refused to bear arms. There he was tortured by six soldiers. After the victim refused to wear a military uniform, he was knocked to the ground and beaten in the kidneys. His arms were twisted behind his back, his head was pressed with an army boot to the floor, his neck was clamped by a perpetrator's knees and his trousers were removed in an attempt to forcibly put the military uniform on him. The victim passed out during the attack and sustained injuries. This was one in a series of similar incidents of Jehovah's Witness conscientious objectors being detained and tortured.

United States of America, 28 June 2022. An employee at a Catholic church in Bellevue was attacked with a rock and spray paint by a transgender woman (a biological male who identifies as a female). The perpetrator damaged the church door, shattered

a glass pane and graffitied anti-Christian insults on the building's wall including "liar", "religion of hate", "rot in your fake hell" and "woman haters". The perpetrator was taken into custody and admitted to vandalism and assault. Investigators said that the perpetrator was angry about the United States Supreme Court's decision a week earlier to overturn *Roe v. Wade*, which ruled that abortion is not a constitutional right.

These examples are taken from ODIHR's Hate Crime Report

INTERSECTIONALITY

Intersectionality is a framework used to identify and understand how overlapping and interconnected aspects of an individual's identity — such as gender, 'race',⁴⁸ ethnicity, class, religion or belief, disability, sexual orientation, gender identity, age and migration status — can combine to create unique experiences of discrimination, disadvantage or privilege. Rather than viewing these characteristics in isolation, intersectionality highlights how they interact in complex and inseparable ways. This approach is particularly important for recognizing the experiences of those who are among the most marginalized in society, as they may face multiple and compounding forms of inequality and discrimination.⁴⁹

Hate crime victims may be targeted based on multiple aspects of their identity, which can intensify the harm they experience.⁵⁰ An intersectional approach to understanding such crimes ensures that the combined and compounding effects of different forms of discrimination are fully taken into account. This approach not only leads to a more accurate understanding of victims' experiences, but also improves the quality of data collection. It requires more than simply recording multiple bias motivations; it involves analysing how these bias motivations interact and reinforce one another to shape distinct and unique patterns of discrimination or privilege. By applying an intersectional lens, responses to hate crime can be better tailored and more effective, as they are grounded in a deeper understanding of the complex realities that victims face.

The following section outlines examples of intersectional anti-Christian hate crime:

Gendered experiences of hate crime: Hate crimes against Christian men and women, boys and girls, often differ along gender lines. Christian women are particularly vulnerable to religion-related violence within domestic settings. In addition to being aggressively

48 The use of the term 'race' in this Guide does not imply endorsement by ODIHR of any theory based on the existence of different races. It is a term widely used in international human rights standards, as well as in national legislation. This Guide uses the term to ensure that people who are misperceived as belonging to another 'race' are protected against hate crimes.

49 *Intersectionality Resource Guide and Toolkit – An Intersectional Approach to Leave No One Behind*, UN PRPD and UN Women, 2022, p. 8.

50 *Understanding the Needs of Hate Crime Victims*, OSCE/ODIHR, 7 September 2020, p. 11.

targeted after converting to Christianity, reports from some pSs indicate that Christian women face forced marriage, house arrest, abduction, shaming, exclusion and both sexual and psychological violence. In Central Asia in particular, there are accounts of Christian women and girls being forced into marriage with Muslim men after their conversion to Christianity.⁵¹

"[When my husband found my Bible], he assaulted me for hours, hitting and kicking my face, hands and legs while screaming distasteful names at me and saying that I betrayed him and the true god. He said that he provides for me and the kids, and only he has the right to decide which god I should believe. In my heart, I knew I was not suffering for nothing. I am suffering for the name of Jesus Christ."⁵²

Moreover, clothing perceived as representing a particular religion or belief, regardless of the actual belief of the person concerned, can contribute to gendered anti-Christian hate crimes. For example, nuns in religious habits or people wearing clerical attire may be specifically targeted.

Austria, 30 October 2020. A 76-year-old Catholic nun was slapped across the head by a young man on a bus in Graz. The victim's hearing aid fell out as a result of the assault.

Spain, 9 December 2023. A group of Jehovah's Witnesses engaging in religious activity on the street were threatened with death by a man in Santa Cruz de Tenerife. The perpetrator subjected a female Jehovah's Witness to sexual assault when he exposed himself in front of her. He also threw stones at the victims and their religious literature carts, and set fire to one of them. The incident was reported to the police.

These examples are taken from ODIHR's Hate Crime Report

Ethnic and racist bias: Christians of certain ethnicities or nationalities often face hate crimes motivated by a combination of anti-Christian and racist biases. In ethnically homogeneous countries, individuals who exhibit physical or cultural traits associated with the majority population but who belong to a minority Christian community may face heightened intolerance. They are sometimes perceived as 'traitors' to the national identity, in contrast to those from visibly different ethnic backgrounds. In a number of pSs, Black Christian communities are perceived and treated differently to predominantly white Christian groups, resulting in unequal levels of risk.

51 Open Doors, *The Persecution of Christian Women and Girls*, pp. 4-6 and 8.

52 Statement by a woman in Central Asia from a Muslim background who adopted Christianity. Her husband discovered her secret faith, and she was forced to flee. See *What does persecution look like in Uzbekistan?* OpenDoors, 2025.

“In Sweden, black African Christians often experience targeted discrimination in certain contexts. Incidents of aggression towards black African Christians have been reported, particularly when they are engaged in religious activities such as street preaching or distributing leaflets with information about African Christian events. Some people have openly expressed their opinion that black African Christians do not have the authority to speak about the gospel to white people, and in some instances this assertion has generated controversy. They may be confronted by groups of white people, who might rough them up or assault them if the confrontation escalates to violence.”

— Associate Professor Dr Anne Kubai, member of the ODIHR Panel of Experts on Freedom of Religion or Belief⁵³

“There has been no legal or theological bar to full participation of [United Kingdom Minority Ethnic/Global Majority Heritage] Anglicans in the life of the Church of England. Time and again, recommendations have been made but it has not yet happened. We believe a lack of intent or prioritisation, and the presence of (now acknowledged) institutional racism, have left the Church poorer for the lack of presence of all of its people at all levels of its life together.”

— The Archbishops’ Anti-Racism Taskforce⁵⁴

Christian members of Indigenous communities have reported experiencing marginalization and harassment for attempting to reconcile their Christian faith with their Indigenous heritage. Incidents have occurred both within their communities and from external sources. In some pSs, efforts to integrate Christian and Indigenous spiritual practices have been met with resistance, stigma or even formal bans by religious institutions.⁵⁵

Canada, 21 June 2021. A Catholic church located on a First Nation reserve was burnt down on National Indigenous Peoples Day. Another Catholic church located on a neighbouring reserve was burnt down on the same day. The incidents occurred soon after it was reported that the remains of 215 Indigenous children had been found near a former boarding school run by the Catholic Church. The Penticton Indian Band Chief highlighted that the attack hurts Indigenous Christians as well:

53 Statement provided to ODIHR for the purpose of reproduction in this Guide, based on interviews conducted in Stockholm in 2024.

54 From Lament to Action, the Archbishops’ Anti-Racism Taskforce, Church of England, 2020, p. 20.

55 A/77/514 Interim report of the Special Rapporteur on freedom of religion or belief, Ahmed Shaheed, Indigenous peoples and the right to freedom of religion or belief, United Nations General Assembly, 10 October 2022, paras. 38 and 45.

“There are some mixed feelings. I understand there is a lot of anger in our community [...] [but] this church has been here since 1911. It was a fixture in our community. Many in our community were members and involved in services. Some of our elders are attached to the church and have come here today very sad.”⁵⁶

Türkiye, 8 May 2020. A church belonging to the Armenian Apostolic denomination was targeted in an arson attack when a perpetrator attempted to set its gate on fire. When arrested, the perpetrator indicated that the attack was motivated by a perceived connection between Armenian people and the spread of COVID-19.

United States of America, 9 January 2022. Worshippers at a historically Black Methodist church were threatened when the church was targeted in a bomb threat in Des Moines, Iowa. Similar incidents targeting Christian churches were happening in the country at the time. The incident was investigated as a hate crime. The congregation issued a statement saying that they believed the attack was not only based on their religion but was also racially motivated.

These examples are taken from ODIHR’s Hate Crime Report

Refugees and migrants: Christian migrants and refugees in the OSCE region may face intersectional hate crimes driven by both religious bias and hostility based on their status as newcomers or non-citizens. Converts to Christianity from outside the OSCE region have reported threats and physical assaults, sometimes perpetrated by other migrants of different religious or belief backgrounds. These incidents often occur in migrant or refugee accommodation centres, where individuals from diverse backgrounds are housed together for extended periods with limited privacy. The uncertainty, exclusion, frustration and tension in these settings can fuel various kinds of bias-motivated incidents, typically targeting groups perceived as vulnerable. Given many of those affected are refugees fleeing persecution in their country of origin, the impact of such hate crimes can intensify the trauma they have already endured, increasing their need for support services.

Armenia, 17 July 2022. An Iranian man seeking asylum had a blanket thrown over his head and was beaten and threatened by two perpetrators due to his conversion to Christianity from Islam. The victim reported that the attackers had threatened him saying, “this is neither the first nor the last time” and “we will send your corpse to Iran.”

⁵⁶ Monique Tamminga, *Penticton band chief condemns suspicious burning of 2 Catholic churches*, *Penticton Western News*, 21 June 2021.

Austria, 23 September 2021. Priests and employees of a Catholic diocese were threatened when their office building was stormed by around 15 hooded men belonging to a right-wing hate group. The perpetrators also brought banners, leaflets and megaphones in protest at the diocese's support for a memorial to the asylum seekers who died in the Mediterranean Sea.

Germany, 20 May 2022. Two Jehovah's Witnesses — a refugee from Ukraine and an 83-year-old woman — were forced to leave a refugee shelter, and the elderly victim was physically assaulted when toppled from her chair by the female landlord of the shelter. The incident occurred after the perpetrator learned of the victims' religious identity.

These examples are taken from ODIHR's Hate Crime Report

Sexual orientation and gender identity: LGBTI Christians may experience unique forms of hate crime that combine anti-Christian bias with homophobia or transphobia, especially when their sexual or gender identity is seen as challenging certain religious values. LGBTI Christians from migrant and certain ethnic backgrounds are sometimes at heightened risk of becoming targets of such crimes.

Estonia, 11 June 2023. The Estonian organization, Association of Gay Christians, held a public Baltic Pride event with a Finnish homosexual pastor in the centre of Tallinn. A young man joined the discussion and asked participants to point out the 'gay pastor' to him. The man then violently attacked the pastor, punching him several times in the face and head. When a member of the group managed to drag the perpetrator away, he threw a knife at the pastor, wounding another community member. The perpetrator shouted "God hates homosexuals" during the attack. The perpetrator was restrained by members of the community until police arrived. The victims were taken to hospital. The pastor suffered several broken bones in his face. Two other victims suffered minor injuries. In a social media post following the attack, the pastor spoke of "the pain caused to minorities in the name of God" and thanked the authorities, medical personnel and bystanders who had helped him, concluding with the message: "We will never let hate win."

This example is taken from ODIHR's Hate Crime Report

II. Anti-Christian hate crimes in the OSCE region: key features⁵⁷

Many features of anti-Christian hate crimes are shared with other types of hate crime, especially anti-Semitic and anti-Muslim hate crimes.⁵⁸ It is important to remember that hate crimes can be committed for a number of reasons:⁵⁹

- The perpetrator may act out of resentment, jealousy, peer pressure or to seek a thrill;
- The perpetrator may have no feelings about the individual victim but may have hostile thoughts or feelings about the group to which the target belongs;
- The perpetrator may harbour hostility towards all individuals who are perceived as outside the group with which they themselves identify;
- On a more abstract level, the target may symbolize a principle or value, such as gender equality, diversity or multiculturalism, that the perpetrator opposes; or
- A combination of the above.

Threatening or physically attacking an individual based on their actual or perceived Christian identity, or targeting people or property because it is associated with Christian individuals, communities or organizations, constitutes an anti-Christian hate crime. Given the diversity of Christian communities across the OSCE region, crimes motivated by bias against Christians can take many forms and may target individuals from both majority or minority denominations. Victims may be targeted for their Christian identity, faith or practices, or because their specific denomination or practices are associated with identity traits, such as a particular ethnic group.

Anti-Christian hate crimes may also target buildings or institutions, including Christian places of worship, cemeteries, monuments or private property associated with Christians or Christianity. Acts such as property vandalism, graffiti or desecration of places of worship are common methods used by perpetrators to harass or intimidate Christians.

⁵⁷ ODIHR has published a factsheet to assist stakeholders in understanding, recognizing and responding to hate crimes targeting Christians, which is available in seven languages. See, [Anti-Christian Hate Crime](#), OSCE/ODIHR, 21 July 2018.

⁵⁸ For more information see, OSCE/ODIHR, [Understanding Anti-Semitic Hate Crimes](#) and OSCE/ODIHR, [Understanding Anti-Muslim Hate Crimes](#).

⁵⁹ OSCE/ODIHR, [Hate Crime Laws](#), p. 17.

BIAS INDICATORS

Bias indicators are “objective facts, circumstances, or patterns attending a criminal act(s), which, standing alone or in conjunction with other facts or circumstances, suggest that the offender’s actions were motivated, in whole or in part, by any form of bias.”⁶⁰ As such, bias indicators are a crucial tool for identifying hate crimes.

Law enforcement agencies should record and document all bias motivations and indicators present when responding to victims of hate crimes, including anti-Christian hate crimes.⁶¹ Bias indicators are valuable tools for law enforcement, prosecutors and civil society to help assess whether a reported incident may constitute a hate crime. However, they do not, on their own, prove that an offender was motivated by bias. Instead, their purpose is to initiate a meticulous and systematic investigation aimed at uncovering the evidence.⁶² As such, not all bias indicators are admissible as evidence in court.⁶³ Below is a description of the main categories of bias indicators for hate crimes, including examples of how these bias indicators can be evidenced in anti-Christian hate crimes.

Main categories of bias indicators

1. Victim, witness or expert perception
2. Comments, written statements, gestures or graffiti
3. Ethnic, religious or cultural differences between the perpetrator and victim
4. Organized hate groups
5. Location and timing
6. Patterns or frequency of previous crimes or incidents
7. Nature of the violence
8. Lack of other motives

Victim, witness or expert perception

The perception of victims or witnesses is crucially important in identifying hate crime. If a victim or witness believes that a perpetrator was motivated by anti-Christian bias, the incident should be investigated as a potential hate crime. Additionally, third parties, such as civil society organizations, independent experts, or Christian communities

60 Massachusetts Model Protocol for Bias Crime Investigation; cited in OSCE/ODIHR, *Hate Crime Data Collection and Monitoring*, p. 15.

61 See also *Improving the Recording of Hate Crime by Law Enforcement Authorities: Key Guiding Principles*, EU High Level Group on combating racism, xenophobia and other forms of intolerance, December 2017.

62 *Using Bias Indicators: A Practical Tool for Police*, OSCE/ODIHR, 2017, p. 4.

63 For instance, this could be the case when a victim/witness is unwilling to give a statement regarding a bias indicator or when circumstantial evidence derived from bias indicators are inadmissible in a particular jurisdiction or insufficient as evidence.

or organizations may recognize bias motivations that were not apparent to the victim or witnesses and can report the incident accordingly. Where this is the case, the law enforcement officer's own perception of the offence as a potential hate crime could be included as a bias indicator.

Latvia, 23 July 2023. A masked man vandalized a Lutheran church in Riga by damaging a baptismal vessel and an icon, scattering sand and pouring water on the vessel. When entering the church, the perpetrator threatened the churchwarden not to call the police, or he would physically assault her and also made death threats against the pastor of the parish. The pastor believed that the attack could have been motivated by hatred against the Christian faith. Law enforcement officers initiated an investigation and arrested the perpetrator.

This example is taken from ODIHR's Hate Crime Report

Comments, written statements, gestures or graffiti

Perpetrators of hate crimes often express their prejudices before, during or after committing the act to convey a message to the victim, their community and society at large. These expressions, whether verbal insults, comments or graffiti, can serve as strong evidence of bias motivation. It is also important to recognize that such messages may reveal intersectional bias, where anti-Christian sentiment is combined with references to other characteristics, such as gender, sexual orientation, ethnicity, migrant status or disability. The following questions can help determine whether a crime was motivated by anti-Christian bias:

- Did the suspect make any statements or gestures related to the victim's affiliation or perceived affiliation with Christianity, a Christian community or Christian-based organization before, during or after the incident? Take into account that different phrases and references can take on different meanings depending on the Christian denomination (see [Annexe 2](#)).
- Did the suspect publish any type of 'manifesto' on social media that indicates anti-Christian bias as their motivation for the incident?
- Were there any written statements, drawings, markings, symbols or graffiti present at the scene of the incident that suggest an anti-Christian bias? This could include anti-Christian or anti-religious symbols (such as those associated with Satanism or anarchism), or messages that attack the structures, doctrine or teachings of a Christian community. For example, graffiti stating that "burning down a church is the only way to ensure freedom."

- If the target was a place of religious or cultural significance, was an offensive object (such as urine or faeces) deliberately left at the scene, or were objects of religious significance to a Christian community desecrated?

Georgia, 7 July 2023. Two female Jehovah's Witnesses were pelted with stones and physically assaulted by a woman shouting derogatory religious insults about Jehovah's Witnesses while they engaged in religious activities in the neighbourhood. One victim was hit in the abdomen and feet with a rod.

Spain, 21 July 2022. A Catholic priest received a letter containing death threats and references to the historical persecution of Catholics in the country. The perpetrator wrote "You will burn like in 36", referring to the start of the Spanish Civil War in 1936 when thousands of priests, monks and nuns were assassinated and churches were burnt.

These examples are taken from ODIHR's Hate Crime Report

Ethnic, religious or cultural differences between the perpetrator and victim

Differences in religion, ethnicity or culture between perpetrator and victim can serve as indicators of bias. This is especially relevant when victims are visibly identifiable as members of a particular group, for example through religious attire. The questions below can help clarify the context of a crime and determine whether it may have been motivated by anti-Christian bias:

- Does the perpetrator support a group that is known to be hostile to Christians or to a specific Christian denomination?
- Was the victim visibly identifiable as a Christian, such as a person wearing a necklace with a cross, or wearing clerical attire?
- Was the target a member of the clergy, such as a priest or a nun?
- Were the victims targeted while communicating about their faith or distributing religious materials?
- Was the victim a convert to Christianity?
- Was the crime committed against an individual who has visibly advocated for the rights of Christian individuals and communities? The individual in question could for instance hold a position within their Christian community or serve as a human rights advocate or defender of Christian rights.

- Was the victim participating in an activity organized by a Christian community, a Christian organization, or an organization that could be perceived as linked to Christian communities, at the time of the incident?

Kazakhstan, 24 February 2023. A male Jehovah's Witness was punched, kicked in the stomach and threatened by two men outside an apartment block in Karaganda while engaging in religious activities in the neighbourhood. The victim was restrained by the perpetrators and repeatedly threatened for 20 minutes.

Poland, 28 May 2023. A 30-year-old Catholic clergyman dressed in clerical garb was punched in the back of the head and the face by a man shouting anti-Christian insults, sustaining minor injuries. The incident occurred as the victim returned from Mass on a Sunday morning.

These examples are taken from ODIHR's Hate Crime Report

Organized hate groups

While not all hate crimes are carried out by organized hate groups, individuals associated with such groups are often implicated in such criminal activities. In the case of anti-Christian hate crimes, the role of organized hate groups is especially relevant in the context of minority Christian denominations and in countries with a minority Christian population. Affirmative answers to any of the following questions may serve as indicators of bias:

- Does the suspect belong to a hate group advocating intolerance against Christians?
- Does the suspect's background or criminal record indicate prior involvement in similar anti-Christian activities, including targeting other groups?
- Has the individual shown support on social media for an organization advocating intolerance against Christians?
- Were any objects or symbols associated with organized hate groups (e.g., hate graffiti, tattoos) observed during the incident? It is important to note that tattoos can carry a range of meanings, including identification with a group, political expression or simply personal or fashion choices.
- Did an organized hate group recently issue threatening statements targeting Christian individuals or communities? Did any organized hate group claim responsibility for the crime afterwards?

- Did the incident take place during or soon after an event sponsored by a hate group, such as a public assembly, or following the group's activism in the vicinity of the incident?

Germany, 8 January 2023. A female Jehovah's Witness was threatened with death by a man who held a gun to her head while shouting neo-Nazi threats due to her religious activities in the street in Frankfurt-Oder. The perpetrator also made a Nazi salute and shouted, "all Jehovah's Witnesses should be killed".

Türkiye, 18 September 2023. A nationalist hate group leader threatened a Protestant pastor and his congregation by inciting hatred against them on social media. The perpetrator publicly stated the names of the pastor and congregation members in a speech and shared them on social media.

These examples are taken from ODIHR's Hate Crime Report

Location and timing

The location and timing of a crime can also serve as indicators of anti-Christian bias. While an incident occurring at or in the vicinity of a Christian place of worship or religious site does not in itself prove a bias motivation, it is a relevant factor that should prompt law enforcement to investigate further for additional indicators of the perpetrator's intent. Answers to the following questions could reveal bias indicators:

- Is the location of the crime generally known or perceived as an area associated with a particular Christian group or community?
- Was the target a place of religious or cultural significance for Christians, such as a Christian place of worship, cemetery or monument? Types of attacks against property include damaging or destroying religious objects — including statues, relics, artefacts, stained glass or nativity scenes — the theft of liturgical equipment and arson.
- Did the incident occur on a date of significance to either victims or perpetrators, whether for religious (such as Christmas or Easter), historical or political reasons?
- Did the incident occur shortly after a change in the religious composition of a specific area, such as the establishment of the first place of worship for a particular Christian denomination)?

Denmark, 29 December 2023. Jehovah's Witnesses were threatened when a firework bomb was set off in the letterbox of a Jehovah's Witness office. This was the second bomb attack targeting the office that year.

France, 8 December 2021. Thirty participants of a torchlit Catholic procession to mark a Catholic holiday were subjected to insults and threats by approximately ten perpetrators, including "Kafirs" ("infidels") and "Wallah [I swear] on the Qur'an I will cut your throat." The participants were also pelted with water and a torch, which had been grabbed from one of the participants.

These examples are taken from ODIHR's Hate Crime Report

Patterns or frequency of previous crimes or incidents

Hate crimes are often not isolated incidents but rather part of a broader pattern of events. The following questions can help determine whether an incident was motivated by anti-Christian bias:

- Was the place of worship, site, monument or facility attacked in any earlier anti-Christian incident? Did similar incidents targeting a specific Christian community previously occur in the area?
- Was the victim previously the target of a bias-motivated crime? Have they recently received harassing or threatening messages or telephone calls based on their Christian identity or affiliation with a Christian community?
- Has there been a recent increase in anti-Christian incidents in the local area? Have similar methods or patterns been observed before?
- Have anti-Christian literature or messages, including those online, been circulating recently in the local area?
- Do the suspects have a history of involvement in crimes motivated by anti-Christian bias?

Italy, 31 December 2021. A figure of Jesus Christ was stolen from a nativity scene outside a cathedral at night. This was one in a series of similar incidents that occurred in the area during Christmas.

United States, 1 April 2021. Nuns at a Catholic convent were threatened when gunshots were fired at the building at night. Some of the bullets entered the walls of two bedrooms while the nuns were sleeping. This was one in a series of three shootings targeting the monastery during Lent. Local law enforcement started an investigation into the shootings and provided extra security to the convent.

These examples are taken from ODIHR's Hate Crime Report

Nature of the violence

Hate crimes, as expressions of rejection towards targeted groups, are often characterized by a high level of violence, damage and brutality. They may also involve degrading treatment intended to undermine the dignity of victims. The following questions can help identify potential bias indicators:

- What was the nature of the incident? For example, did the perpetrator set fire to religious items or commit offensive acts within a Christian place of worship? Anti-Christian hate crimes may also target symbolic objects, such as consecrated hosts, which represent the body of Christ in the theology of certain Christian denominations.
- Did the incident entail unprovoked and extreme violence or degrading treatment?
- Was the incident carried out in public or in a manner designed to make it public, such as through recording and posting on social media?
- Could the act have been motivated by, or intended to replicate, a well-known anti-Christian offence? This may include online or offline references to a previous anti-Christian hate crime made before, during or after the incident.
- Did the incident exhibit the typical methods and patterns associated with an organized hate group? Was specific language used against Christianity or Christian communities that might indicate an ideology promoted by hate groups?

Spain, 3 November 2023. A Muslim man posted threats against Christian people, Jewish people and the LGBTI community on social media and praised the previous killing of a Catholic sexton by a Muslim man in a church in Algeciras at the beginning of the year. The man was detained by police when the investigation found that he was trying to buy weapons and bulletproof vests.

Uzbekistan, 9 April 2023. Several Christian Baptist worshippers were brutally beaten and hit with electric prods and other implements by police who broke into their prayer house on Easter Sunday. The police also arrested three church members.

These examples are taken from ODIHR's Hate Crime Report

Lack of other motives

The absence of alternative motives may indicate a potential bias motivation. Hate crimes frequently target individuals as perceived representatives of a particular group. As a result, the choice of victim can appear random and, due to the lack of any personal connection between the offender and the victim, no clear motive may be evident. However, in such cases, the possibility of a bias motivation should not be overlooked.

TYPES OF ANTI-CHRISTIAN HATE CRIMES

There are two main categories of hate crimes: attacks against individuals — including murder, other violent attacks and threats — and attacks against property. The spectrum of criminal offences motivated by anti-Christian bias is broad, ranging from high-profile attacks to more minor incidents, which, if not addressed properly, can escalate. These attacks can be perpetrated by individuals acting alone or as part of an organized hate group.

Attacks against individuals

Individuals may be targeted for various reasons, often due to characteristics that make them identifiable as Christians. This includes individuals who represent Christian communities or organizations, are located near Christian places of worship, religious sites, monuments and other facilities, who participate in Christian public events, observe Christian holidays or belong to minority or ethnic groups associated with, or perceived to be part of, a particular Christian denomination. Acts motivated by anti-Christian bias may also affect individuals with social, personal or professional ties to Christians. Additionally, those who speak out against intolerance against Christians or raise awareness about intolerance and discrimination against Christians may also become victims of anti-Christian hate crimes.

However, not all crimes targeting Christians, or those perceived to be Christian, constitute anti-Christian hate crimes. According to the OSCE understanding, a hate crime must be motivated by bias against Christians. Therefore, if an incident involving a Christian victim is driven by political or ideological motives, or is a random criminal act, it would likely not be classified as an anti-Christian hate crime.⁶⁴

a. Murder

In recent times, there have been fatalities in the OSCE region where evidence indicates that the attacks were motivated by anti-Christian bias.

France, 10 May 2022. A 40-year-old man was attacked by a man from behind and stabbed to death in front of his two children as he collected them from a Catholic school in Marseilles. The perpetrator later claimed he had acted for religious reasons “in the name of God”.

Germany, 9 March 2023. Several people were killed in a shooting during a service at a Jehovah’s Witnesses Kingdom Hall in Hamburg. The perpetrator was a former member of the community who had previously expressed animosity towards Jehovah’s Witnesses.

These examples are taken from ODIHR’s Hate Crime Report

b. Other violent attacks

Other types of violent anti-Christian attacks that have been reported in OSCE pSs include:

- Abduction
- Sexual assault
- Robbery
- Pulling at or using violence to remove a victim’s religious literature or other items
- The use of weapons, such as firearms, explosive devices, knives and baseball bats
- Physical assault, such as beatings, grabbing, pushing, slapping or similar assaults

Violent attacks targeting Christians can result in severe physical, emotional and psychological harm, necessitating hospitalization, medical care and counselling for the victims.

64 For instance, in November 2021 in Siedlce, Poland, the severe beating of a Catholic monk during a walk in a park, which led to his death, was initially investigated as a potential anti-Christian hate crime. Nevertheless, the investigation found that the attack was committed by a serial killer, with no evidence that he had been motivated by anti-Christian bias. Alicja Franczuk, Rafał J. *brutalnie skatował młotkiem księdza Adama. To nie jedyna jego ofiara. Nowe fakty*, Warszawa, 30 December 2022 (in Polish).

France, 14 January 2020. A 12-year-old boy of Serbian origin was brutally attacked by five other 11-year-old pupils for not removing a chain necklace with a cross which he wore under his clothes. The perpetrators pushed the victim to the ground and kicked him all over his body, resulting in serious injuries to his face and genitals.

United Kingdom, 15 October 2023. A man who converted from Islam to Christianity was stabbed by his housemate, a Muslim man, because of his perceived religious apostasy. The perpetrator was armed with two knives when he kicked open the door of his housemate's bedroom and shouted "Allahu Akbar" – God is great – before stabbing him several times, including in the chest. According to the prosecutor, the housemates initially got along until the perpetrator found out that the victim had converted to Christianity. The prosecutor said the perpetrator considered the victim an apostate and "therefore somebody who deserved to die".

These examples are taken from ODIHR's Hate Crime Report

c. Threats

Threats targeting members of the Christian community and clergy have also been reported. These threats encompass various forms of criminal conduct, including death and bomb threats. They may be delivered through mail, email, social media, telephone calls, in-person confrontations, graffiti on Christian establishments or other means. Often, these threats feature anti-Christian slogans and symbols, conveying messages of violence, murder and destruction directed at the Christian community.

Latvia, 29 May 2023. Jehovah's Witnesses in Riga were threatened by a man while engaging in religious activities in the street. The perpetrator also threw the victims' cart containing religious literature into the river.

Serbia, 23 October 2021. A threatening letter containing xenophobic insults and death threats was left in the mailbox of the local Slovak Evangelical church in Begeč. The letter included threats such as, "If you have any sense, leave! If you don't, hell awaits you like our Serbs in Kosovo!" The community had previously received similar threats.

These examples are taken from ODIHR's Hate Crime Report

Attacks against property

According to ODIHR's Hate Crime Reporting, attacks against property are the most common type of anti-Christian incidents in the OSCE region. These attacks predominantly target Christian places of worship, cemeteries and monuments.⁶⁵ Anti-Christian attacks against property can take the following forms:

- Arson
- Throwing flammable and explosive devices (e.g., Molotov cocktails)
- Throwing stones through windows
- Drawing graffiti or placing anti-Christian posters and stickers on walls, doors or graves
- Damaging religious objects, relics and artefacts
- Overturning tombstones or otherwise damaging cemeteries
- Burglary
- Hacking
- Theft

Where a slogan or symbol indicating anti-Christian bias is used to damage property not directly associated with the Christian community, the act may still constitute an anti-Christian incident. For example, vandalism against government buildings, historical monuments or sporting events that include anti-Christian graffiti or imagery aligns with the OSCE understanding of a hate crime. Conversely, criminal acts such as vandalism, burglary or theft directed at a Christian community, but motivated by opportunism or financial gain rather than anti-Christian bias would not constitute an anti-Christian hate crime.

Bosnia and Herzegovina, 9 May 2021. The facade of a Catholic church in Bihać was vandalized with anti-Christian graffiti before Mass on a Sunday. The outside wall of the church was spray painted with "Jesus is a paedophile". The church had previously been targeted in a similar incident.

Sweden, 24 January 2021. An 800-year-old Protestant church in Stockholm was targeted in an arson attack when two explosives were thrown at the gate and the building, shattering the windows. Another meeting place of this religious community had been targeted in a bomb attack two years earlier, and the investigation did not result in a conviction.

These examples are taken from ODIHR's Hate Crime Report

⁶⁵ 2023 Hate Crime Report, OSCE/ODIHR, 2023.

III. Anti-Christian hate crimes in the OSCE region: impact

The impact of hate crimes on individual victims is usually more severe than that of other crimes.⁶⁶ Targeting aspects of an individual's identity can cause deep and lasting psychological trauma. This distress is often intensified in cases involving multiple bias motivations or when victims belong to marginalized or vulnerable groups.

Beyond harming individual victims, hate crimes function as 'message crimes', sending a broader signal of intolerance to the victim's community and society at large. Every anti-Christian hate crime conveys a message of exclusion and devaluation — not only to the targeted individual, but to Christian communities in general — declaring that they 'do not belong' or that they 'are not welcome'. Other groups may also experience heightened fear, sensing that they too could become targets.⁶⁷

In addition to inflicting lasting trauma on victims, their families and their communities, hate crimes undermine social cohesion by stoking fear and division. When hate crimes are not effectively addressed, targeted communities may lose trust in state institutions, and tensions between groups can escalate.⁶⁸ Tolerating, endorsing or overlooking anti-Christian hate crimes directly contradicts the long-standing and explicit commitments of pSSs to promote tolerance, foster mutual respect and understanding, and ensure freedom of religion or belief. The consequences of such inaction extend beyond Christian communities, affecting the fabric of society as a whole.

THE IMPACT OF SECURITY CHALLENGES AND ANTI-CHRISTIAN HATE CRIMES ON EXPRESSING CHRISTIAN IDENTITY

The fear of victimization might cause Christians to become more cautious, even to the point of self-censorship in public spaces, thereby limiting their ability to fully enjoy their freedom of religion or belief. This hesitation to express their religious identity can manifest in various ways:

- **Selective disclosure.** Christians may choose to withhold information about their religious identity in certain settings, avoiding open discussions about their faith or the distribution of religious literature due to safety concerns. Converts to

66 Hate Crime Victims in the Criminal Justice System. A Practical Guide, OSCE/ODIHR, 9 April 2020, p. 29.

67 Model Guidance on Sensitive and Respectful Treatment of Hate Crime Victims in the Criminal Justice System, OSCE/ODIHR, 4 October 2021, p. 11.

68 OSCE/ODIHR, Understanding the Needs of Hate Crime Victims, p. 8.

Christianity, particularly women and young people, may feel compelled to hide Bibles or religious materials out of fear of violence from household members who do not share their beliefs.

- **Restrictions on religious attire.** Individuals might avoid wearing visible religious clothing, such as clerical garments, to prevent drawing unwanted attention or harassment.
- **Concealment of religious symbols.** Some Christians may choose to hide or only discreetly display Christian symbols, such as a cross, to avoid potential negative reactions.
- **Suppression of religious practices in restrictive settings.** In contexts such as prisons or migration/refugee reception or detention centres, Christians may refrain from owning a Bible or engaging in prayer due to fear of attacks. Similarly, in countries where Christian identity is stigmatized within the armed forces, and where military service is obligatory for men, Christian conscripts may avoid carrying religious texts, displaying symbols or practising their faith to protect themselves from discrimination or hostility from peers and superiors.
- **Alteration of names.** Individuals might modify or adopt neutral names to diminish overtly Christian associations and reduce the risk of targeting.
- **Reluctance to register religious identity.** Where national systems require the declaration of religious affiliation, some Christians may be hesitant to disclose their faith.
- **Avoidance of religious exemptions.** In educational settings where Christians are entitled to opt out of religious instruction, some may refrain from asserting this right, fearing negative consequences or unwanted attention.

“In the asylum centre, the Muslims discovered through my Bible reading that I was a Christian. I received death threats. They wanted me to return to Islam. The director said that he was powerless and couldn’t protect me. When I feared for my life, I reported the incident to a social worker, who wrote a report about it. The death threats continued to increase. The interpreter wanted to play down the threats and cover them up with the social services. The office instructed the centre management to take better care of my safety. But they didn’t feel able to do so. That’s why I was moved to another shelter.”⁶⁹

69 Statement by male, Christian refugee from Iraq in Germany. Mangelnder Schutz religiöser Minderheiten in Deutschland. Religiös motivierte Übergriffe auf 743 christliche Flüchtlinge in deutschen Asylunterkünften, Open Doors Germany, p. 26, (in German).

THE IMPACT OF SECURITY CHALLENGES AND CHRISTIAN HATE CRIMES ON CHRISTIAN RELIGIOUS PRACTICE, COMMUNITY AND SOCIAL LIFE

Anti-Christian hate crimes can instil fear in Christian communities, leaving individuals feeling vulnerable and at risk of future attacks. As a result, security concerns arising from such incidents can have a significant impact on Christian religious, communal and social life in several ways, with particularly harmful effects on the collective exercise of their freedom of religion or belief:

- **Reluctance to participate in religious services.** Security threats arising from hate crimes, such as attacks on places of worship, may deter Christians from attending religious services and gatherings out of concern for their personal safety.
- **Hesitation to publicize religious festivals and events.** Fear of potential attacks may discourage communities from organizing or openly promoting religious festivals, celebrations and other events. Christians may avoid distributing public invitations or making announcements for religious festivals, such as Christmas and Easter, or other religious gatherings.
- **Closure of social initiatives run by Christian organizations.** Repeated targeting of Christian-run institutions — such as schools, hospitals, and charitable agencies — can result in their closure. This not only restricts the social engagement of Christian communities, but also limits their ability to express their faith through service to the wider community.
- **Community isolation.** Continued threats, combined with inadequate or ineffective responses from law enforcement and state authorities, may lead Christian communities to self-isolate, disengaging from broader society and reducing cooperation with public institutions.
- **Financial burden of security measures.** In situations where the authorities are unable or unwilling to ensure adequate protection, Christian communities may feel compelled to invest in private security for their places of worship, community centres and other facilities. These expenses can significantly strain community resources, especially for smaller Christian groups with limited financial means or less state support.
- **Relocation.** In extreme cases, persistent security challenges and lack of institutional support may force Christian communities to relocate — whether to a different area within their country or abroad — in search of safety and freedom to practice their religion.

“For us, over time, it has become too tiring. When we’re in the Church of the Holy Cross, we’re always on the alert, always ready to react to any lack of respect for the place, the people or the celebrations taking place there. [...] This constant state of alert prevents us from living prayer as it is lived out in our Benedictine vocation. [...]

“We have been able to collaborate with the municipality — we’re thinking of the ‘street mediators’ in particular — with the police — both national and municipal — with Samu Social [municipal humanitarian emergency service], and so on. It’s because we’ve ‘tried everything’ that we can say we can’t do ‘more’. Taking all these parameters into account, we found it difficult to envisage the future in this climate of insecurity. In the end, we decided to return to Champagne to be closer to our source: the monastery of our sisters, the Benedictines of Saint-Thierry. [...]

“We’re at peace with this decision, but we’ll leave with a heavy heart. [...] It will be difficult for us to leave you, to leave you behind.”

— Letter to the community by two nuns who felt forced to leave Nantes, France, due to a context of insecurity and repeated insults and violence.⁷⁰

The response of both the authorities and wider society to anti-Christian hate crimes plays a crucial role in shaping the impact of hate crimes on Christian individuals and communities. These responses can either reinforce or challenge the intolerance that fuels such crimes. Active investigation, prosecution and conviction of hate crimes sends a powerful message of justice for victims, while also condemning the motivations and actions of the offenders. On the other hand, when the hate-driven nature of these crimes and the overall climate of intolerance are not robustly addressed by the authorities, and no clear consequences are directed at the perpetrators, communities may lose trust in both their security and the effectiveness of state authorities.⁷¹

Bosnia and Herzegovina, 2019-2021. Members of the Serbian Orthodox Church in the City of Mostar have registered repeated anti-Christian incidents. On 28 August 2019, a priest and Orthodox believers who gathered to celebrate the Assumption received threatening messages on social media, after which a Serb community group issued a statement that underscored the impact of a robust response from the authorities:⁷²

“We are saddened by the silence of the authorities in the City of Mostar, the Herzegovina-Neretva Canton and the Federation, who have not condemned the incident, threats and hate speech expressed towards members of the Serbian people.”

70 Vers un départ, Facebook post, 26 February 2023 (in French).

71 OSCE/ODIHR, *Understanding the Needs of Hate Crime Victims*, pp. 13 and 37.

72 Koordinacija Srba: Sankcionirati prijetnje Srbima u Mostaru, *Herzegovina Info*, 31 August 2019 (in Bosnian).

In April 2021 a burglary was committed at the home of a parish priest of the Serbian Orthodox Church in Bijelo Polje. The Parish Priest of Mostar issued a statement drawing attention to the impact on the community of repeated incidents:⁷³

“Dozens of such and similar cases, whose perpetrators have not been discovered, are bringing unrest and insecurity to every pore of our community.”

Furthermore, civil society-led efforts, including multi-faith initiatives to condemn hate crime and address their root causes, can demonstrate solidarity and provide vital support for victims. In contrast, indifference from wider society can exacerbate the isolation and vulnerability of affected individuals and communities.

“This Thursday marks one year since the death of our father and husband, Diego Valencia. It has been twelve hard months in which the whole family has longed for him and remembered the fatal circumstances in which he passed away. [...] we have been aware at all times of the support that friends and strangers have sent us. This is the moment to thank all of them for their generous closeness and selfless solidarity, without which, sincerely, it would have been difficult to bear the pain generated. [...]”

“May the infinite mercy of Our Lord have mercy on those who generate and have generated so much evil in the world [...]

“Finally, we would like to reiterate our gratitude for the countless expressions of affection, as proof and demonstration that his life, and that of so many other people belonging to the Church, was and is full of meaning.”

— Open letter to the media by the family of the sacristan who was stabbed to death in the attack in Algeciras, Spain, in January 2023, to mark the one-year anniversary of his death.⁷⁴

The security situation of Christian communities is also shaped by broader historical, political, and economic factors. On the one hand, the impact of anti-Christian hate crimes can be more intense in communities that have historically been marginalized and subjected to discrimination or even persecution.⁷⁵ On the other hand, the historically dominant or privileged position of Christianity in many pSs does not mean that Christian individuals and communities in those countries are immune to hate crimes or that they do not deserve support to ensure their security. They are as entitled to the same state protection as any other religious or belief community affected by hate crime.

⁷³ SPC traži da se hitno pronadu provalnici u kuću bjelopoljskog paroha, *Bljesak Info*, 22 April 2021 (in Bosnian).

⁷⁴ Rubén García Perea, La emotiva carta de la familia de Diego Valencia en el aniversario de su asesinato: «Gracias a todos», *Diario Área*, 23 January 2024.

⁷⁵ OSCE/ODIHR, *Understanding the Needs of Hate Crime Victims*, p. 13.

“I was praying into the microphone at the altar when I heard a loud noise. I looked up and saw a sight no one wants to see: two guns were firing, and the believers were lying under the pews or running for shelter.

“One of the attackers pointed the gun at me. As a member of the congregation pushed me into the sacristy, I saw myself without any power to protect the sheep from the bandits who wanted to kill them.

“Then suddenly there was complete silence.

“As I walked among the pews and overturned chairs, I asked the congregation lying on the ground, ‘Are you alright?’ No one answered me. I thought they were all dead. I felt like a shepherd counting the killed sheep.

“Then someone was calling the emergency line. The police and ambulance arrived very quickly; then came the journalists and TV crews.

“The President of Turkey was one of the first to speak out against the incident, expressing the sympathy of the nation, followed by expressions of solidarity from several civil, political and religious authorities. Our neighbours also showed themselves as brothers and sisters. Christians, Muslims, Alevis and Jews alike showed closeness, solidarity and concrete help that were very touching.

“The police were standing in front of the entrance to the church and the garden day and night. In only 12 hours, they caught the two people who were harming our society.

“On the Sunday after the attack on the Mass, February 4, 2024, there were very few people. There were many police at the door, two busloads of police, three cars and special forces...

“As we are gradually returning to normal, I have been trying to make sense of everything that has happened and to get a sense of the future. In our church, on Sunday, January 28, 2024, a great miracle happened, no matter how bad it was. Although two terrorists entered the church ready to commit a massacre, they only killed one person as both guns jammed at the same time, after the first terrible shots.

“Several times after the incident, I see the scene of two masked men shooting at us while we are celebrating the holy mass and I often look at the door. I pray for those two masked people. The recovery period is the most beautiful time for the community; the community thanks God for the miracle that has happened, and rejoices in being together.”

— Statement by parish priest fra Anton Bulai about the attack on the Nativity of the Blessed Virgin Mary Church in Istanbul on 28 January 2024⁷⁶

⁷⁶ Statement provided to ODIHR for the purpose of reproduction in this Guide.

PART TWO:
OSCE Commitments
and International Standards
on Intolerance against Christians
and Key Principles on Addressing
Anti-Christian Hate Crimes

This section provides an overview of the relevant OSCE commitments and international standards on intolerance against Christians and hate crime. It also outlines the key principles that should underpin measures aimed at addressing anti-Christian hate crimes.

I. Political commitments and international obligations

OSCE HUMAN DIMENSION COMMITMENTS ON INTOLERANCE AGAINST CHRISTIANS

OSCE pSs have repeatedly condemned and committed to addressing intolerance and discrimination based on religion or belief, including intolerance against Christians. While underlining the importance of a comprehensive approach to address intolerance and discrimination, pSs have also acknowledged the specificities of different forms of intolerance, including “manifestations of racism, xenophobia, anti-Semitism, discrimination and intolerance, including against Christians, Jews, Muslims and members of other religions, as well as violent manifestations of extremism associated with aggressive nationalism and neo-Nazism”.⁷⁷ The 2005 Cordoba Conference marked the first high-level OSCE declaration to explicitly reference intolerance against Christians. Participating States committed to:⁷⁸

“Condemn without reserve racism, xenophobia, anti-Semitism, and other forms of intolerance and discrimination, including against Muslims and Christians [...]; and reaffirm their existing OSCE commitments in this field; [...]

Reiterate that international developments or political issues never justify racism, xenophobia, or discrimination, including against Muslims, Christians and members of other religions;”

The declaration also encouraged the ongoing activities of the Personal Representative on Combating Racism, Xenophobia and Discrimination, also focusing on Intolerance and Discrimination against Christians and Members of Other Religions,⁷⁹ and welcomed their role in “raising awareness of the overall fight of the OSCE to combat discrimination and promote tolerance”.

⁷⁷ OSCE Ministerial Council Decision No. 10/07, para. 1.

⁷⁸ OSCE, *Cordoba Declaration by the Chairman-in-Office*, para. 2.

⁷⁹ First incumbent appointed on 23 December 2004. See, *OSCE Chair appoints three Personal Representatives to promote tolerance and non-discrimination*.

Subsequent Ministerial Council decisions built on these commitments. In 2005, pSs committed to addressing prejudice, intolerance and discrimination against Christians, inter alia:

“Encourage public and private educational programmes that promote tolerance and non-discrimination, and raise public awareness of the existence and the unacceptability of intolerance and discrimination, and in this regard, to consider drawing on ODIHR expertise and assistance in order to develop methods and curricula for tolerance education in general, including: [...] Fighting prejudice, intolerance and discrimination against Christians, Muslims and members of other religions.”⁸⁰

In 2006, the OSCE Ministerial Council called upon pSs to address the root causes of intolerance and discrimination “through increased awareness-raising measures that [...] [a]im to prevent intolerance and discrimination, including against Christians, Jews, Muslims and members of other religions.”⁸¹ Additionally, in 2007, the Ministerial Council called for “continued efforts by political representatives, including parliamentarians, strongly to reject and condemn manifestations of [...] discrimination and intolerance, including against Christians, Jews, Muslims and members of other religions.”⁸²

In 2013, the Ministerial Council called on pSs to:⁸³

“Aim to prevent intolerance, violence and discrimination on the basis of religion or belief, including against Christians, Jews, Muslims and members of other religions, as well as against non-believers, condemn violence and discrimination on religious grounds and endeavour to prevent and protect against attacks directed at persons or groups based on thought, conscience, religion or belief; [...]

Promote dialogue between religious or belief communities and governmental bodies, including, where necessary, on issues related to the use of places of worship and religious property; [...]

Adopt policies to promote respect and protection for places of worship and religious sites, religious monuments, cemeteries and shrines against vandalism and destruction;”

Finally, in 2014, the Ministerial Council issued the Declaration on Enhancing Efforts to Combat Anti-Semitism, which encouraged pSs to “elaborate Ministerial Council Declarations on enhancing efforts to combat intolerance and discrimination, including against Muslims, Christians and members of other religions.”⁸⁴

⁸⁰ OSCE Ministerial Council Decision No. 10/05, para. 5.3.

⁸¹ OSCE Ministerial Council Decision No. 13/06, para. 5.

⁸² OSCE Ministerial Council Decision No. 10/07, para. 1.

⁸³ OSCE Ministerial Council Decision No. 3/13, p. 2.

⁸⁴ OSCE Ministerial Council Decision No. 8/14, p. 3.

OSCE HUMAN DIMENSION COMMITMENTS ON HATE CRIME

OSCE pSs have emphasized the importance of addressing hate crime in a number of commitments. The 2003 Maastricht Ministerial Council urged pSs to combat hate crimes, and to collect and keep records on such crimes.⁸⁵ In 2004, pSs were urged by the Permanent Council to combat hate crimes, denounce them, and support intergovernmental and non-governmental work in this area. States were also asked to collect data on hate crime, and report it periodically to ODIHR.⁸⁶ The 2005 Ministerial Council called upon pSs to strengthen their efforts to address hate crime, including the reporting of information and statistics.⁸⁷ This call was repeated at the Ministerial Council in Brussels in 2006⁸⁸ — where additional capacity building on hate crimes, including work with victims, as well as capacity building for civil society, were further called for — and again in Madrid, in 2007.⁸⁹ Finally, in 2009 at the Ministerial Council in Athens, a decision was adopted focusing solely on hate crime, calling for data collection, adequate legislation, training and capacity building, victim support and other actions to combat hate crimes.⁹⁰

INTERNATIONAL AND REGIONAL STANDARDS RELEVANT TO ADDRESSING INTOLERANCE AGAINST CHRISTIANS

The Universal Declaration of Human Rights,⁹¹ the International Covenant on Civil and Political Rights (ICCPR),⁹² and the European Convention on Human Rights (ECHR)⁹³ enshrine fundamental human rights for universal protection. Manifestations of intolerance against Christians challenge, undermine or violate the fundamental human rights principles contained in these international standards, such as the dignity and equality of all human beings, freedom of religion or belief and non-discrimination. Under international human rights law, states have an obligation to respect, protect and fulfil human rights,⁹⁴ which has important implications for states' responsibilities in addressing anti-Christian hate crimes.

85 OSCE Ministerial Council Decision No. 4/03.

86 OSCE Permanent Council Decision No. 621.

87 OSCE Ministerial Council Decision No. 10/05.

88 OSCE Ministerial Council Decision No. 13/06.

89 OSCE Ministerial Council Decision No. 10/07.

90 OSCE Ministerial Council Decision No. 9/09.

91 Universal Declaration of Human Rights (UDHR), United Nations, 10 December 1948.

92 International Covenant on Civil and Political Rights, United Nations, General Assembly, 16 December 1966.

93 Convention for the Protection of Human Rights and Fundamental Freedoms, Council of Europe, 4 November 1950.

94 The obligation to respect means that states themselves must not abridge human rights. The obligation to protect means that states have a positive duty to protect individuals and groups from human rights abuses. The obligation to fulfil means governments must take positive action to facilitate the assurance of human rights for all. See *International Human Rights Law*, Office of the United Nations High Commissioner for Human Rights, Instruments and Mechanisms.

International human rights treaties contain a number of provisions that are especially relevant to addressing anti-Christian hate crimes. The preamble of the ICCPR, for example, highlights “the inherent dignity of the human person” and the right of “freedom from fear”, both of which are violated by hate crime.⁹⁵ States are under the obligation to effectively investigate and unmask possible bias motivations in relation to relevant human rights in conjunction with the prohibition of discrimination.⁹⁶ The following section expands on some of the main human rights that are potentially violated by anti-Christian hate crimes.

Prohibition of discrimination (ICCPR Article 26, ECHR Article 14) sets out the obligation for states to ensure that everyone within their territories and subject to their jurisdictions enjoys their human rights without distinction or discrimination of any kind, including on the basis of religion or belief. The United Nations Declaration on the Elimination of All Forms of Intolerance and of Discrimination Based on Religion or Belief stipulates that states should “take all appropriate measures to combat intolerance on the grounds of religion or other beliefs”,⁹⁷ which implies a responsibility to address intolerance against Christians.

The right to life (ICCPR Article 6, ECHR Article 2) recognizes everyone’s right to life as a supreme right under which no derogation is permitted.⁹⁸ The duty to protect the right to life includes an obligation for states to adopt any appropriate laws or other measures to protect life from all reasonably foreseeable threats, including those emanating from private individuals and entities.⁹⁹ The protection of this right is especially critical to the most serious types of anti-Christian hate crimes — those that take or threaten the lives of individuals.

Prohibition of torture, inhuman and degrading treatment or punishment (ICCPR Article 7, ECHR Article 3) protects both the dignity and the physical and mental integrity of the individual. States must ensure protection through effective measures against these prohibited acts, including by private individuals.¹⁰⁰ Sustained physical attacks that take place in a wider context of acts of hostilities against religious minorities can amount to ill-treatment and “when investigating violent incidents State authorities have the additional duty to take all reasonable steps to unmask any religious motive and to establish whether or not religious hatred or prejudice may have played a role in the events”.¹⁰¹ Thus, they must consider if there was additionally a breach of the prohibition of discrimination.

95 United Nations, *International Covenant on Civil and Political Rights*.

96 *Milanović v. Serbia*, App no 44614/07, ECtHR, 14 December 2010, paras. 96-98.

97 UN Declaration on the Elimination of All Forms of Intolerance and of Discrimination Based on Religion or Belief, UN General Assembly Resolution 36/55, 25 November 1981, para. 4. As a General Assembly resolution, the declaration is not legally binding on States, although it does create an international standard for action.

98 *General Comment 36 on Article 6: right to life*, CCPR/C/GC/36, Human Rights Committee, 3 September 2019, para. 2.

99 *Ibid.*, para. 18.

100 *Šečić v. Croatia*, App no 40116/02, ECtHR, 14 December 2010, para. 67.

101 *Milanović v. Serbia*, App no 44614/07, ECtHR, 14 December 2010, para. 96.

The right to privacy, family and home (ICCPR Article 17, ECHR Article 8) protects everyone's right from arbitrary or unlawful interference, including by private individuals. For example, states must conduct effective investigations into potential bias motivations underlying incidents that occur in the victims' homes, as the location enhances their sense of vulnerability.¹⁰²

The right to freedom of religion or belief (ICCPR Article 18, ECHR Article 9) protects a broad range of acts, including the freedom to worship and to build places of worship, to use ritual formulae and objects, to display symbols, to observe holidays and to wear distinctive clothing.¹⁰³ The freedom to have or to adopt a religion or belief of one's choice, including the right to change one's religion or belief — also known as the *forum internum* — is afforded absolute protection under international law.¹⁰⁴ In this regard, there are no permissible grounds for restricting this freedom, including on the basis of 'security' or 'national security'.¹⁰⁵ States are obligated to protect religious minorities, including Christians, even when abuses are committed by non-state actors such as 'extremist' groups.¹⁰⁶

Freedom of expression (ICCPR 19, ECHR 10) protects all forms of expression and constitutes the cornerstone of every free and democratic society.¹⁰⁷ Article 19(2) of the ICCPR states that the exercise of the right to freedom of expression "carries with it special duties and responsibilities" and lists respect of the rights or reputations of others and the protection of national security, public order or public health and morals as legitimate grounds for restricting it. "Prohibitions of displays of lack of respect for a religion or other belief system, including blasphemy laws, are incompatible with the [ICCPR], except in the specific circumstances envisaged in article 20, paragraph 2, of the [ICCPR]."¹⁰⁸ Article 20(2) requires State Parties to prohibit advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence, serving thereby as an important safeguard against infringement of the rights of individuals and religious or belief communities, and against acts of violence or persecution directed towards those groups.¹⁰⁹

102 *R.B. v. Hungary*, App no 64602/12, ECtHR, 12 April 2016 and *Alković v. Montenegro*, App no 66895/10, 5 December 2017.

103 UN HRC, *General Comment 22*, para. 4.

104 OSCE/ODIHR, *FoRB Security Guide*, pp. 15-16.

105 UN HRC, *General Comment 22*, paras. 5 and 8.

106 UN Special Rapporteur on Freedom of Religion or Belief, *Interim report by the Special Rapporteur of the Commission on Human Rights on the elimination of all forms of intolerance and of discrimination based on religion or belief*, United Nations General Assembly, 8 September 2000, para. 138.

107 *General Comment 34, Article 19: Freedoms of opinion and expression*, CCPR/C/GC/34, UN Human Rights Committee, 12 September 2011, para. 2.

108 *Ibid.*, para. 48.

109 UN HRC, *General Comment 22*, paras. 7 and 9. See also the Rabat Plan of Action on the prohibition of advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence which lists six factors to determine whether speech amounts to incitement to hatred for the application of Article 20 of the ICCPR and is serious enough to warrant restrictive legal measures: (1) the context of the statement; (2) the speaker's position or status; (3) the intent to incite the audience against the target group; (4) the content and form of the statement; (5) the extent of its dissemination; and (6) the likelihood of harm, including imminence. A/HRC/22/17/Add.4 Report of the United Nations High Commissioner for Human Rights on the expert workshops on the prohibition of incitement to national, racial or religious hatred, United Nations General Assembly, 11 January 2013, para. 29.

Similarly, the Council of Europe's (CoE) European Commission against Racism and Intolerance (ECRI) recommends that States ensure that "oral, written, audio-visual expressions and other forms of expression, including the electronic media, inciting to hatred, discrimination or violence against racial, ethnic, national or religious groups or against their members on the grounds that they belong to such a group are legally categorised as a criminal offence", in accordance with Article 10 of ECHR.¹¹⁰ In 2015, the Parliamentary Assembly of the CoE adopted a resolution on tackling intolerance and discrimination in Europe with a special focus on Christians. It called on member States to "ensure the protection of minority Christian communities" and to "publicly condemn the use of and incitement to violence, as well as all forms of discrimination and intolerance on religious grounds."¹¹¹

The right to an effective remedy (ICCPR Article 2.3, ECHR Article 13) imposes obligations on states to ensure that people whose human rights have been violated have access to effective and enforceable remedies. The United Nations Declaration of Basic Principles of Justice for Victims of Crime and Abuse of Power states that victims of crimes, which would include victims of anti-Christian hate crimes, should:¹¹²

- Be treated with compassion and respect for their dignity;
- Be entitled to access the mechanisms of justice and receive prompt redress, as provided for by national legislation, for the harm they have suffered; and
- Be provided with proper assistance throughout the legal process.

The Declaration includes other provisions relevant to addressing anti-Christian hate crimes, with calls for police, justice, health, social services and other personnel to receive training to sensitize them to the needs of victims. It emphasizes that special attention should be paid to individuals with heightened vulnerability due to the nature of the harm or their identity.

Beyond international human rights law, **international humanitarian law** (IHL) offers protection to religious or belief communities and sites from hate crimes in specific contexts, particularly during armed conflicts. Acts of persecution against religious or belief communities can constitute crimes against humanity or genocide, both prohibited under IHL. Systematic attacks or hate crimes targeting members of religious or belief communities during armed conflicts may fall under these categories. Article 33 of the Geneva Convention (IV) relative to the Protection of Civilian Persons in Time of War prohibits

110 ECRI General Policy Recommendation N°1 on combating racism, xenophobia, antisemitism and intolerance, European Commission against Racism and Intolerance (ECRI), 4 October 1996.

111 Council of Europe Resolution 2036 (2015) Final version, Tackling intolerance and discrimination in Europe with a special focus on Christians, Parliamentary Assembly, 29 January 2015 (8th Sitting).

112 UN General Assembly, Resolution 40/34, Declaration of Basic Principles of Justice for Victims of Crime and Abuse of Power, 29 November 1985.

pillage, indirectly safeguarding religious sites from looting during armed conflicts. In addition, attacks on places of worship constituting the cultural or spiritual heritage of peoples are prohibited in both international and internal armed conflicts.¹¹³

EUROPEAN UNION (EU) STANDARDS RELEVANT TO ADDRESSING INTOLERANCE AGAINST CHRISTIANS

The EU Charter of Fundamental Rights recognizes the right to freedom of thought, conscience and religion, including the “freedom to change religion or belief and freedom, either alone or in community with others and in public or in private, to manifest religion or belief, in worship, teaching, practice and observance.”¹¹⁴

The 2008 EU Framework Decision requires that all EU Member States take the necessary measures to ensure that racist and xenophobic motivation, including on the ground of religion, is considered an aggravating circumstance, or, alternatively, that such motivation may be taken into consideration by the courts in the determination of the penalties. Further, the 2008 EU Framework Decision requires all EU Member States to make certain forms of incitement speech and ‘hate speech’, including on the group of religion, punishable by criminal penalties.¹¹⁵

In 2011, the Council of the European Union expressed concern about religious intolerance “as epitomized by recent violence and acts of terrorism, in various countries, against Christians and their places of worship,” and reaffirmed its commitment to promoting freedom of religion or belief.¹¹⁶ The same year, the European Parliament adopted a resolution on the situation of Christians in the context of freedom of religion, condemning all acts of violence against Christians and urging states to “step up their efforts to provide reliable and efficient protection for the religious denominations in their countries and to ensure the personal safety and physical integrity of members of religious denominations in the country”.¹¹⁷

113 Article 53 of Additional Protocol I and Article 16 of Additional Protocol II. In the context of peace and freedom of religion or belief, the UN Special Rapporteur on Freedom of Religion or Belief recommended that States “protect all individuals, including persons belonging to religious or belief minorities, from being targeted on grounds of religion or belief and, further, ensure that State actors refrain from ‘securitizing’ persons belonging to religious or belief minorities and communities” (A/79/182). With respect to the rights of people belonging to religious or belief minorities in situations of conflict or insecurity, the Special Rapporteur recommended that States “[f]ulfil obligations to prohibit incitement (online and offline) to discrimination, hostility or violence based on religion or belief” and “[f]acilitate early warning and response systems through violence prevention strategies encompassing the most at-risk communities” (A/HRC/49/44).

114 EU Charter of Fundamental Rights, Article 10, European Union Agency for Fundamental Rights (FRA), Official Journal of the European Union, C 303/17, 14 December 2007.

115 Council Framework Decision of 28 November 2008 2008/913/JHA on combating certain forms and expressions of racism and xenophobia by means of criminal law, Official Journal of the European Union, Council of the European Union, 28 November 2008, Articles 1 and 2.

116 Press release. 3069th Council meeting Foreign Affairs, Council of the European Union, 21 February 2011.

117 European Parliament resolution of 20 January 2011 on the situation of Christians in the context of freedom of religion, European Parliament, 20 January 2011.

In 2022, the European Parliament adopted a resolution on the persecution of minorities on the grounds of religion or belief, stressing the “paramount importance of holding accountable perpetrators of human rights abuses against persons belonging to belief or religious minorities”.¹¹⁸ The resolution emphasized the importance of supporting women and girls, acknowledging that “women belonging to belief or religious minorities are particularly at risk of increased discrimination and violence” and that they have been “specifically and increasingly targeted with the purpose of inflicting harm on their community as a whole.”

The 2012 EU Victims’ Rights Directive established minimum standards for the rights, support and protection of victims of crime, including hate crime victims. It recognizes them as particularly vulnerable, calling on EU Member States to ensure that victims receive an individual assessment to identify specific protection needs as well as additional protection rights throughout the criminal justice process. Furthermore, the Directive calls on Member States to establish specialized victim support services tailored to hate crime victims.¹¹⁹

118 European Parliament resolution of 3 May 2022 on the persecution of minorities on the grounds of belief or religion (2021/2055(INI)), European Parliament, 3 May 2022.

119 Directive 2012/29/EU of the European Parliament and of the Council of 25 October 2012 establishing minimum standards on the rights, support and protection of victims of crime, and replacing Council Framework Decision 2001/220/JHA, Official Journal of the European Union – European Parliament, 25 October 2012, Articles 8-9 and 22-23; To enhance the implementation of the Directive, the European Commission issued a guidance note in 2017: Ensuring justice, protection and support for victims of hate crime and hate speech: 10 key guiding principles; Information on the specific resources available to victims of hate crime is also available at the European Commission’s Overview of resources and initiatives to support progress on ensuring justice, protection and support for victims of hate crime and hate speech in the EU Member States, December 2017.

II. Key principles to guide efforts to address anti-Christian hate crimes and the security needs of Christian communities

The following principles should guide efforts by OSCE participants and other relevant actors to address anti-Christian hate crimes and the related security needs of Christian communities.

1. RIGHTS-BASED

A human rights-based approach is a conceptual and practical framework based on international human rights standards and directed at promoting, protecting and fulfilling human rights for all.¹²⁰ It places the focus on common values and principles, rather than on differences, highlighting the equal rights and standing of every individual, regardless of their religion, ethnic origin, gender or other factors. It also underscores the indivisibility, interconnectedness and interdependence of human rights, in the sense that all human rights of all individuals and communities are equally important and that the realization of one right often is contingent on the realization of others.

A human rights-based approach to addressing anti-Christian hate crimes and the related security challenges facing Christian communities grounds policymaking and implementation in international human rights law. It prioritizes the dignity, equality and rights of all individuals, regardless of religion or belief, ethnicity, gender, sexual orientation, disability or other identity characteristics. This approach reinforces the understanding that pSs are under an obligation under international law to protect individuals and religious or belief communities from bias-motivated threats and attacks that challenge, undermine or violate fundamental human rights.

2. COMPREHENSIVE, HOLISTIC AND COOPERATIVE

Addressing anti-Christian hate crimes requires a comprehensive, cross-cutting and holistic approach, because these offences are rarely isolated incidents; they are often symptoms of broader societal divisions, systemic prejudices and deep-seated intolerance. This approach ensures that the fight against anti-Christian hate crimes does not occur

¹²⁰ Human Rights-Based Approach, European Network for National Human Rights Institutions (ENNHRI).

in isolation, but stands in solidarity with efforts to combat all forms of intolerance and discrimination. It recognizes the interconnected and overlapping nature of these issues, because intolerance — whether based on ethnicity, nationality, religion or belief, gender, sexual orientation, disability or other identity characteristics — often stems from similar root causes and drivers, such as fear, ignorance, prejudice, historical injustices and economic inequalities. Further, it reinforces the important principle that human rights are indivisible and universal. When governments and societies address anti-Christian hate crimes as part of a broader human rights challenge, they not only protect those targeted but also strengthen the social fabric against division, enabling societies to become more just, inclusive, cohesive and peaceful for everyone.

Addressing anti-Christian hate crimes requires a comprehensive and multifaceted approach that cuts across and incorporates a broad spectrum of measures and actors to effectively address the problem, including its root causes and drivers, in both preventative and responsive ways. Legal frameworks, awareness-raising, education, interfaith and interreligious dialogue, media responsibility and support services for victims all contribute to building an inclusive and human rights-respecting environment where Christian individuals and communities, like all others, can feel secure and respected. Equally important is the need to engage a wide array of stakeholders as part of a comprehensive and holistic approach to tackling anti-Christian hate crimes. National and local authorities, including policymakers and law enforcement agencies, civil society organizations, national human rights institutions, equality bodies, educators, social media and technology companies, the media, affected Christian communities and other religious or belief communities, must all play active roles in shaping and implementing effective responses. This comprehensive and inclusive engagement ensures that policies and measures can draw upon the insights and strengths of various sectors.

A cooperative and well-coordinated approach is vital to addressing anti-Christian hate crimes and related security challenges. When all key actors work in concert, as part of a whole-of-society endeavour, efforts to address anti-Christian hate crimes become more resilient and far-reaching. Integrated efforts across key sectors not only protect the rights and dignity of Christian individuals and communities, but also identify overlapping patterns of intolerance, discrimination and hate crimes, and reinforces the broader values of freedom of religion or belief, pluralism and social cohesion.

Broad-based, inclusive civil society coalitions have proven effective in combating various forms of intolerance.¹²¹ Organizations working to address anti-Christian hate crimes should explore partnerships with other groups and communities working to promote tolerance and non-discrimination that might otherwise remain isolated or disconnected. This includes women's rights organizations, anti-racism and xenophobia groups, other

121 In recognition of the potential of coalitions to develop and implement powerful, innovative and inclusive strategies that can lead to significant change, in 2018 ODIHR published *Coalition Building for Tolerance and Non-Discrimination: A Practical Guide* to support individuals and organizations seeking to build and maintain coalitions aimed at addressing various forms of intolerance and discrimination.

religious or belief communities and those working for LGBTI and disability rights. By fostering solidarity and the sharing of learning and good practices, a cross-cutting civil society-based framework for advancing tolerance and non-discrimination encourages deeper understanding and the development of more inclusive, effective and sustainable solutions to combat all forms of intolerance and hate crimes, including those affecting Christians.

One example of cooperation between different religious and faith-based organizations in the area of security is the Safer and Stronger Communities in Europe (SASCE) project, which was implemented jointly by the Security and Crisis Centre of the European Jewish Congress, the Conference of European Churches, the European Buddhist Union and the Faith Matters organization. The aim of the project was to increase security in and around places of worship, as well as within and between Christian, Buddhist, Muslim and Jewish communities. The project included the development of a poster and video on identifying and reporting hate crime as well as training on crisis management and ways of ensuring security for religious or belief communities, including in response to anti-Christian hate crimes.¹²²

3. PARTICIPATORY

Effective responses to hate crimes require the active participation of Christian individuals and communities in the development and implementation of policies and measures designed to address anti-Christian hate crimes and related security concerns. Inclusive participation ensures the voices of diverse Christian communities — from different denominations, ethnic backgrounds and social contexts — are heard and represented in policymaking and public discourse. This approach builds trust among and between government authorities, other key stakeholders and Christian communities.

The experiences of those impacted by hate crimes are essential to shaping responsive and informed efforts to tackle the problem of anti-Christian hate crimes, its causes and drivers effectively. Hate crime victims can provide valuable information to policymakers to increase their level of awareness about what it means to become a victim of a bias-motivated incident and, thereby, strengthen their ability to address associated risks in a comprehensive manner. Particular attention should be paid to creating opportunities for hate crime victims from the most marginalized communities and those that face a high risk of bias-motivated victimization to share their experiences.¹²³

¹²² Safer and Stronger Communities in Europe (SASCE) website.

¹²³ Including the voices of hate crime victims in policymaking and policy implementation – a practical guide, OSCE/ODIHR, 3 June 2024, p. 12.

ODIHR's publication *Including the voices of hate crime victims in policymaking and policy implementation – a practical guide*¹²⁴ presents ten practical steps for national stakeholders:

1. Putting victims at the centre of any initiative
2. Choosing a suitable format for engagement
3. Preparing the engagement
4. Creating safer spaces
5. Managing expectations
6. Offering support before, during and after the event
7. Building trust and long-term partnerships
8. Putting systems in place to institutionalize hate crime victims' voices
9. Avoiding the instrumentalization of victims and their voices
10. Ensuring that a range of voices are heard

A shift towards a problem-oriented, community-based policing approach can promote the active participation of Christian individuals and communities in enhancing public safety and social cohesion. This approach also contributes to establishing trust between law enforcement and the communities they serve. Reflecting a community's diversity within the law enforcement workforce is an important factor in effectively addressing anti-Christian hate crimes. Greater representation fosters stronger relationships between targeted communities and law enforcement, improves institutional understanding of the concerns of both majority or minority Christian denominations, and bring diverse perspectives to the formulation of policies and procedures.

4. DO NO HARM

The do no harm principle requires that all measures to address hate crime avoid exacerbating existing vulnerabilities or introducing new risks. Every effort should be made not to jeopardize the life, physical and psychological safety, freedom and well-being of victims, witnesses and communities affected by anti-Christian hate crimes. Hate crime victims are particularly at risk of secondary victimization,¹²⁵ which can severely impact their emotional and psychological health and social and economic well-being.¹²⁶

¹²⁴ *Ibid.*

¹²⁵ "Secondary Victimization refers to the victimization that occurs not as a direct result of the criminal act but through the response of institutions and individuals to the victim. This includes, but is not limited to, not recognizing and treating the victim in a respectful manner, an insensitive and unprofessional manner of approaching the victim and discrimination of the victim in any kind." *Preventing Secondary Victimization policies and practices*, European Crime Prevention Network, EUCPN Toolbox Series No. 7, p. 9.

¹²⁶ OSCE/ODIHR, *Understanding the Needs of Hate Crime Victims*, p. 14.

In line with the do no harm principle, the prevention of secondary victimization is crucial and can be achieved through an emphasis on empathy and care throughout the criminal justice and victim support processes.¹²⁷ An empathetic response to anti-Christian hate crimes requires that those working with hate crime victims understand the individual and communal impacts of hate crimes on individuals and communities and have the skills to offer emotional support.

5. VICTIM-CENTRED

A victim-centred approach puts the victim at the centre of the response to anti-Christian hate crimes, recognizing the victim's perception and experience and giving special importance to the victim's rights and needs. This approach acknowledges that hate crime victims are individuals with specific needs. It treats them as an authority on their own experience and an equal, informed partner in progressing their case through the criminal justice or other rehabilitation processes.¹²⁸ This approach should:¹²⁹

- Foster trust with Christian individuals and communities and other civil society organizations to encourage reporting of hate incidents and ensure access to reporting mechanisms;
- Take into account the victim's perception of the bias motivation for the crime;
- Keep hate crime victims informed about the progress of their cases;
- Provide effective protection and support measures to hate crime victims, based on the specific needs of individual victims and affected communities, and consider the gender perspective by identifying whether people of different genders have distinct protection and support needs;
- Ensure victims can fully participate in court proceedings;
- Provide training for all government bodies and civil society organizations engaging with victims, including social services working with victims of domestic violence so they can recognize and respond to anti-Christian hate crimes; and
- Allocate adequate funding and other resources to ensure the availability and sustainability of services provided by civil society organizations to Christian individuals and communities affected by hate crime.

¹²⁷ Hate Crime Victim Support: Policy Brief, OSCE/ODIHR, 22 April 2022, p. 25.

¹²⁸ *Ibid.*, pp. 8-9.

¹²⁹ *Ibid.*, pp. 41-3.

Crucially, a victim-centred approach avoids using victims to serve institutional, political or ideological agendas. The aim must be to promote tolerance and non-discrimination, effectively address hate crimes and foster inclusive and cohesive societies.¹³⁰

The Canadian Victims Bill of Rights defines a victim as “an individual who has suffered physical or emotional harm, property damage or economic loss as the result of the commission or alleged commission of an offence.”¹³¹ It gives every victim the right to information, protection, participation and the right to seek restitution. Following a finding of guilt, victims have the right to present a victim impact statement for the court to consider in sentencing (section 722 of the Criminal Code). A victim impact statement is a written statement drafted by the victim that describes the physical or emotional harm, property damage or economic loss that he or she has suffered as a result of the offence. The Court must take the victim impact statement into account when sentencing an offender.¹³²

6. GENDER SENSITIVE

Hate crime victims, including those belonging to Christian communities, often face intersecting forms of intolerance and discrimination based on gender, sexual orientation, ethnicity, religion or belief and more.¹³³ An intersectional approach ensures that policies and other measures address these overlapping and interconnected vulnerabilities.

A person’s gender may influence the nature, frequency and impact of their experiences of bias-motivated crime. Therefore, government measures to address anti-Christian hate crimes and the related security needs of Christian communities must be gender sensitive.

7. TRANSPARENT

Governments must be open and transparent about the measures they are taking to address anti-Christian hate crimes. Transparency helps build and strengthen trust among and between stakeholders working to counter anti-Christian hate crimes and ensure the security of Christian communities.

¹³⁰ OSCE/ODIHR, *Including the voices of hate crime victims in policymaking and policy implementation*, p. 29.

¹³¹ *Canadian Victims Bill of Rights*, Canada – Justice Laws Website, 23 April 2015.

¹³² *Criminal Code*, Canada – Justice Laws Website, 1985.

¹³³ See the discussion on intersectionality in the [section](#) on “Anti-Christian hate crimes in the OSCE region: context” above.

One effective approach is to share national, regional or local action plans and regular progress reports with affected communities and the wider public. This allows for clear communication about what is being done, what is effective and where challenges remain. Key actors can also be invited to participate in evaluating progress and to share their learning about how to effectively counter anti-Christian hate crimes. Additionally, making hate crime data publicly accessible is a vital aspect of maintaining transparency.

In Sweden, the Forum for Living History of the Ministry of Culture is responsible for conducting follow-up on the implementation of the National Action Plan against Racism and Hate Crime and publishes an annual report on this topic.¹³⁴ In addition, the Swedish National Council for Crime Prevention (*Brå*) regularly publishes statistical reports on hate crime reported to the police, providing, among others, data disaggregated by bias motivation, type of crime, gender, location and relationship between the victim and the perpetrator.¹³⁵

¹³⁴ Samordning och uppföljning av statens arbete mot rasism och hatbrott, Forum för levande historia website.

¹³⁵ Jon Lundgren and Aravella Lejonstad, Hate crimes reported to the Police in 2022, The Swedish National Council for Crime Prevention (*Brå*), 2023.

PART THREE:
**Responding to Anti-Christian Hate
Crimes and the Security Challenges
of Christian Communities**

This section outlines practical steps for addressing anti-Christian hate crimes and the related security challenges facing Christian communities. In line with a comprehensive approach to addressing intolerance,¹³⁶ the recommended practical steps aim both to address the commonalities and shared characteristics of hate crimes and recognize and address the specificities of anti-Christian hate crimes. These steps emphasize the primary responsibility of pSs in tackling acts of intolerance and discrimination within their jurisdictions. At the same time, they acknowledge the complementary and vital roles of other stakeholders, particularly Christian communities and wider civil society.

Practical steps

1. ACKNOWLEDGING THE PROBLEM

The starting point for addressing anti-Christian hate crimes is to acknowledge that it poses a serious threat not only to the security of individuals and communities but also to broader societal cohesion. This requires a prompt, coordinated and comprehensive response. Effectively countering anti-Christian hate crimes and its associated security challenges requires sustained political will and commitment. Governments must send a clear and unequivocal message that all forms of hatred, including anti-Christian sentiment, are unacceptable. This stance must extend beyond hate crimes to ‘hate speech’ — even when it does not meet the legal threshold for criminal prosecution — because such expression can foster a discriminatory and hostile environment for individuals and communities and undermines societal cohesion and security.¹³⁷

Official recognition of anti-Christian hate crimes is essential to delegitimizing hostility and violence based on religion and belief and fostering trust with the affected groups and communities.¹³⁸ It also reinforces the messages that responsibility for addressing these issues lies not with Christian communities alone, but with the whole of society, including its governments and political representatives.

Governments and policymakers have several avenues through which they can acknowledge and address the challenges related to anti-Christian hate crimes and the security of Christian communities, including:

- Commission empirical research on anti-Christian hate crimes and disseminate reports developed by civil society organizations to enhance governmental understanding of the issue;

¹³⁶ OSCE Ministerial Council Decision No. 10/07.

¹³⁷ OSCE/ODIHR, *Hate Crime Prosecution at the Intersection of Hate Crime and Criminalized ‘Hate Speech’*, p. 17.

¹³⁸ UNGA, *A/75/385*, paras. 30-1.

- Establish cross-governmental or parliamentary working groups to coordinate responses, address various dimensions of anti-Christian hate crimes and build trust among different Christian communities, political representatives and policymakers;
- Create standing forums that include government officials, security services, civil society representatives and Christian community leaders to identify and respond to concerns related to anti-Christian hate crimes and associated security challenges;
- Develop a robust legal framework that enables government collaboration with Christian communities to effectively address their specific security challenges;
- Acknowledge that Christian individuals and communities have been targets of hate crimes, including by violent ‘extremists’ or terrorists, and include Christian communities and institutions on lists of potential soft targets; and
- Issue prompt and strong public condemnations of anti-Christian hate incidents and crimes, both online and offline, that express solidarity with Christian communities.

Recognizing anti-Christian hate crimes as a pressing challenge can also serve as the basis for a critical evaluation of existing mechanisms for preventing and responding to hate crimes more broadly.

Recommendation

Governments and policymakers should acknowledge that intolerance against Christians and anti-Christian hate crimes pose a serious threat not only to the security of individuals and communities but to broader wider societal cohesion, requiring a prompt, coordinated and comprehensive response.

Example of good practice

The Parliamentary Assembly of the CoE acknowledged the issue of anti-Christian hate crimes in its 2015 resolution on tackling intolerance and discrimination in Europe with a special focus on Christians:¹³⁹

“Intolerance and discrimination on grounds of religion or belief affect minority religious groups in Europe, but also people belonging to majority religious groups. Numerous acts of hostility, violence and vandalism have been recorded in recent years against Christians and their places of worship, but these acts are often overlooked by the national authorities.”

¹³⁹ Council of Europe, Resolution 2036.

2. PROMOTING EDUCATION, AWARENESS-RAISING AND INTERFAITH AND INTERRELIGIOUS DIALOGUE

Intolerance towards religious or belief communities is not caused by societal diversity itself, but rather by negative attitudes to religious or belief diversity and by approaches to managing peaceful coexistence among individuals and groups of different religious, belief and ethnic backgrounds in society.¹⁴⁰ The attitudes and tensions that fuel inter-communal conflict are often deeply rooted in stereotypes and misconceptions. Therefore, one of the most urgent challenges today is to foster knowledge and understanding of different religions, beliefs and cultures.

In the long term, anti-Christian hate crimes and the security needs of Christian communities can only be effectively addressed by tackling the underlying prejudice that drives intolerance. As already discussed, efforts to counter specific forms of intolerance and hatred, including anti-Christian bigotry, are most effective when integrated into a broader strategy aimed at eliminating all forms of hatred in society. Three distinct yet complementary strategies for preventing anti-Christian hate crimes and other forms of intolerance are education, awareness-raising and interfaith and interreligious dialogue.

Interfaith dialogue can bridge divides between communities, encouraging empathy and solidarity across religious lines. Media responsibility, public awareness campaigns and support services for victims also contribute to building an inclusive environment where Christian communities, like all others, can feel secure and respected. A multifaceted strategy ensures that the root causes of intolerance are addressed in both preventative and responsive ways.

Education

OSCE pSs have committed to addressing the root causes of intolerance and discrimination through education. Considering that prejudice is often learned, education can play a critical role in addressing and countering all manifestations of prejudice and discrimination.¹⁴¹

Education plays a vital role in challenging the conditions that give rise to intolerance, as well as in cultivating a culture rooted in equality, understanding and inclusion. By promoting respect for diversity and tolerance and actively discouraging prejudice, education becomes a powerful tool for building a more cohesive, peaceful and secure society. It raises awareness of the valuable contributions to society that individuals from all backgrounds make and fosters mutual understanding. Moreover, education is essential for dispelling harmful stereotypes and instilling a culture of respect from an early age.

¹⁴⁰ A/79/182 Interim report of the Special Rapporteur on freedom of religion or belief, Nazila Ghanea, United Nations General Assembly, 18 July 2024, para. 37.

¹⁴¹ Addressing Anti-Semitism through Education. Guidelines for Policymakers, UNESCO and OSCE/ODIHR, 31 May 2018, p. 12.

OSCE pSs should therefore develop comprehensive education policies and strategies that promote greater understanding of, and respect for, diverse cultures, ethnicities, religions and beliefs. In doing so, they can benefit from the expertise and assistance of ODIHR in designing and implementing educational programmes, curriculums and teaching methods — both in public and private settings — to address all forms of intolerance, including intolerance against Christians effectively. Furthermore, states are encouraged to foster a culture of tolerance and respect for diversity beyond formal education by engaging with institutions, such as museums, libraries and cultural heritage centres.¹⁴²

Moreover, states should implement comprehensive training and capacity-building initiatives for public officials, particularly within law enforcement, to enhance their awareness of and sensitivity towards Christian communities and their experiences of hate crimes. This training should aim to strengthen the religious literacy¹⁴³ of public officials, equipping them to address the needs of individuals and groups from diverse religious or belief backgrounds.¹⁴⁴ This includes the ability to engage respectfully and appropriately with victims of anti-Christian hate crimes.

Educational measures that foster respect for religious or belief diversity should:¹⁴⁵

- Deliver unbiased and accurate information about the diversity of religions and beliefs in society, helping to combat religious illiteracy, negative stereotypes, misperceptions and prejudice;
- Create opportunities for individuals of different religious and belief backgrounds, including non-believers, to interact and experience diversity in an open and natural way;
- Equip participants with the knowledge, skills and attitudes to live harmoniously in a pluralistic society;
- Be grounded in respect for human dignity and universal human rights; and
- Aim to reduce conflicts rooted in misunderstanding or lack of awareness about others' beliefs.

In addition, education plays a crucial role in strengthening learners' media and information literacy, particularly in response to the growing spread of disinformation and

¹⁴² OSCE/ODIHR, *FoRB Security Guide*, p. 20-21.

¹⁴³ Religious literacy entails the ability to discern and analyse the fundamental intersections of religion and social/political/cultural life through multiple lenses. See: [What is Religious Literacy? | Religion and Public Life at Harvard Divinity School](#)

¹⁴⁴ *Belief, Dialogue and Security — Fostering dialogue and joint action across religious and belief boundaries*, OSCE/ODIHR, 2 October 2024, p. 48.

¹⁴⁵ OSCE/ODIHR, *FoRB Security Guide*, p. 20-21.

misinformation.¹⁴⁶ OSCE pSs should adopt measures to “educate social media users about the harms of online harassment and abuse, including the psychological impacts and chilling effects on targeted or marginalized groups”,¹⁴⁷ including Christian communities. These educational initiatives can be developed in collaboration with civil society organizations, which often have valuable experience in developing tools and resources — especially for young people — on the responsible use of social media and digital communication technologies to foster tolerance, respect for diversity and inclusion.

Recommendation

Governments should develop comprehensive domestic education policies and strategies to address the root causes of intolerance and discrimination, including intolerance against Christians. These measures should be implemented both in private and public education institutions, in other public institutions, and in training initiatives for public officials.

Examples of good practice

The ‘Din tro min tro’ (‘your faith, my faith’) project in Denmark is an initiative originating from the Folkekirke — the Evangelical-Lutheran Church occupying the special rank of ‘the Established Church of Denmark’ — which is supported by the state. The project activities include representatives of Judaism, Christianity and Islam explaining their faiths and practices to middle school students and engaging in a dialogue in the close and friendly environment of the classroom.¹⁴⁸

Spain carries out annual training days as part of the ‘Municipalities of Tolerance’ programme, promoted by the Pluralism and Coexistence Foundation with the Spanish Federation of Municipalities and Provinces (FEMP), to help local governments take an inclusive approach to religious diversity. The conference improves the capacities of law enforcement to protect the free exercise of freedom of religion or belief and combat religious intolerance. This is done in collaboration with the Spanish Episcopal Conference, the Federation of Evangelical Religious Entities in Spain, Jehovah’s Witnesses in Spain and other religious institutions.¹⁴⁹

¹⁴⁶ OSCE/ODIHR and UNESCO, *Addressing Anti-Semitism through Education. Guidelines for Policymakers*, p. 14; and UNGA, *A/HRC/47/25*, para. 20.

¹⁴⁷ OSCE/ODIHR, *Belief, Dialogue and Security*, p. 34.

¹⁴⁸ *A/HRC/34/50/Add.1*, Report of the Special Rapporteur on freedom of religion or belief on his mission to Denmark, United Nations General Assembly, 28 December 2016, para. 65.

¹⁴⁹ *Polici a Local y Protecci n de la Libertad Religiosa*, Federaci n Espa ola de Municipios y Provincias (FEMP), 18 December 2023 (in Spanish).

Awareness-raising

Awareness-raising campaigns and initiatives that inform society about religious or belief communities, their rights and the value of religious and belief diversity represent another key strategy for preventing anti-Christian hate crimes. Such measures should aim to:¹⁵⁰

- Raise awareness about the existence and experiences of religious and belief diversity. This includes providing a clear and accurate understanding of the specific characteristics of contemporary anti-Christian bias, as well as of common discriminatory narratives that drive intolerance against Christians;
- Highlight the value of religious and belief diversity as a source of mutual enrichment within societies. This involves emphasizing the positive cultural, religious and educational contributions of the local Christian communities to wider society; and
- Challenge negative stereotypes that contribute to the rise of discrimination, hostility and intolerance in society by promoting understanding of and respect for different religions and beliefs. One key message could be that anti-Christian hate crimes do not take place in a vacuum — everybody has a role to play in fostering a climate of mutual respect and understanding. Another critical message is that manifestations of anti-Christian bias have no place in open, equal and democratic societies, as they undermine core values and human rights principles that form the foundation of such societies.

Awareness-raising programmes should be developed and delivered through collaboration between the state and a wide range of stakeholders, such as civil society organizations, national human rights institutions, cultural heritage bodies, education professionals, the media and Christian and other religious or belief communities, as well as interfaith and interreligious organizations.¹⁵¹

Local governments are well-placed to implement awareness-raising activities aimed at addressing intolerance and strengthening social cohesion.¹⁵² At the national level, parliamentary hearings on intolerance against Christians can be an effective means of bringing the issue to the forefront of the national agenda. On the international stage, organizations can provide a platform for adopting international commitments and standards on intolerance against Christians, facilitate the exchange of good practices and coordinate regional or international awareness-raising campaigns to counter such intolerance.

¹⁵⁰ OSCE/ODIHR, *FoRB Security Guide*, p. 21.

¹⁵¹ *Ibid.*

¹⁵² A/78/207 Interim report of the Special Rapporteur on freedom of religion or belief, Nazila Ghanea. Freedom of religion or belief, from the grass-roots level, United Nations General Assembly, 19 July 2023, para. 25.

Civil society organizations can play a crucial role in developing and implementing long-term initiatives that raise public awareness of the importance of human rights, peaceful coexistence and pluralistic societies. These efforts can also nurture empathy and critical thinking, which are essential for reducing bias and negative stereotypes while fostering positive attitudes towards diversity. In recent years, a considerable range of awareness-raising initiatives involving civil society has emerged across the OSCE region, contributing to the promotion of diversity and inclusion.

Furthermore, both traditional media and social media platforms can play a pivotal role in raising awareness about the nature and impact of intolerance against Christians. “There is clear evidence that robust public information regimes and independent journalism are strong antidotes to disinformation.”¹⁵³ Partnering strategically with the media as part of government efforts to counter and condemn intolerance against Christians can significantly enhance public awareness of the problem. In certain contexts, this may involve, as a first step, engaging with the media to challenge biased narratives about both majority and minority Christian communities. Furthermore, given that digital technologies have transformed the information and media landscape, awareness-raising efforts should leverage the online space, especially social media, to launch awareness-raising campaigns and combat anti-Christian content circulating online.

Recommendation

Governments should collaborate with a wide range of actors to develop and implement awareness-raising campaigns and activities using diverse methods and at different levels of society to raise awareness and understanding of intolerance against Christians.

Examples of good practice

The Office of Religious Affairs of the Municipality of Barcelona was created in 2005 to combat inequalities related to the enjoyment of the right to freedom of thought, conscience and religion or belief, promote awareness of the religious plurality in Barcelona and generate spaces for participation, dialogue and positive interaction between the different beliefs and with the rest of the city’s inhabitants. The Office implements a variety of activities based on a preventive approach to promote tolerance and inclusion, including:¹⁵⁴

- Support to religious communities to organize religious activities in public spaces and handing out brochures on religious traditions with the logo of the Municipality during these religious activities

¹⁵³ UNGA, A/HRC/47/25, para. 23.

¹⁵⁴ Religious Affairs Office. Area of Culture, Education, Sports and Life Cycles, Municipality of Barcelona.

- Cultural activities to highlight the cultural significance of religious communities
- Support to religious communities to engage in the participatory and consultative processes of the City Council
- Educational activities in high schools related to prejudice based on religion
- Training for community police officers, including visits to local places of worship — including those belonging to Protestant communities, Jehovah’s Witnesses and the Philadelphia Church of God — to build personal relationships
- Interfaith dialogue spaces, including with youth
- Funding for renovations of places of worship, including security features

On 19 January 2025, civic and faith leaders in Guildford, England, signed the Guildford Declaration of Freedom of Religion and Belief.¹⁵⁵ Remembering the unjust expulsion of the Jewish community of the town in 1275, the Guildford Declaration states:

“We celebrate the rich tapestry of cultural, religious, and ethnic diversity that strengthens our borough. [...] We stand united against all forms of hate, prejudice, and violence. [...] Together, we commit to building a future rooted in inclusivity, understanding, and shared responsibility, ensuring that the mistakes of history are not repeated.”

At the signing event, the Right Reverend Andrew Watson, Bishop of Guildford said:

“This has been a powerful and sobering occasion, as we’ve marked the 750th anniversary of a dark day in the history of our town – the expulsion of the Jews from Guildford by order of the then Queen. Both Church and State were complicit in fuelling that injustice, and today has been an opportunity to acknowledge that. But perhaps its main value has been the opportunity to reflect on religious discrimination in all its forms – learning from the past to shape a better future.”

‘Get the Trolls Out! Undivided Action on Divisive Speech’ is a project and campaign that combats intolerance and discrimination based on religious grounds in Europe. Led by the Media Diversity Institute (MDI) with the support of six partners from across Europe, the campaign harnesses the power of social media to disseminate innovative media outputs and generate dialogue in order to challenge online religious hate, including anti-Christian sentiment.¹⁵⁶

¹⁵⁵ Civic, religious and community leaders of Guildford send a powerful message of unity, Guildford Borough. 21 January 2025.

¹⁵⁶ Get The Trolls Out website, Media Diversity Institute.

Interfaith and interreligious dialogue and partnerships

Interfaith and interreligious dialogue and partnerships are effective strategies for addressing the root causes of religious intolerance, countering negative stereotypes based on religion or belief, promoting relationships of openness and trust, and fostering understanding and mutual respect among individuals and communities of different religions and beliefs. The UN Special Rapporteur on freedom of religion or belief has underscored the importance of interreligious dialogue in religiously pluralistic societies, “to prevent stereotypes, dispel misunderstandings and develop trust across religious and denominational divides.”¹⁵⁷

While these dialogue initiatives are often initiated and coordinated by religious or belief communities themselves, it is also important that states actively promote, support and facilitate open and transparent interfaith and interreligious dialogue and partnerships.¹⁵⁸ Continuous, appropriate state support is essential to ensure that such efforts contribute meaningfully and sustainably to building more cohesive, inclusive, and secure societies.¹⁵⁹

Continuous state support is essential to ensuring that such efforts contribute meaningfully and sustainably to building more cohesive, inclusive and secure societies.

Interfaith and interreligious dialogue and partnerships should:¹⁶⁰

- Respect the autonomy of religious or belief communities;
- Respect the voluntary nature of participation by religious or belief communities;
- Accommodate the existing diversity of religious or belief communities, including newly established and smaller communities, especially if promoted or facilitated by the state;
- Ensure, as far as possible, the equal participation of women and men, and the substantive and substantial participation of youth, especially if promoted or facilitated by the state; and
- Incorporate informal dialogue initiatives as an effective means to advance freedom of religion or belief for all and to enhance mutual respect and understanding and promote tolerance.

¹⁵⁷ UNGA, A/HRC/34/50/Add.1, para. 65.

¹⁵⁸ OSCE Ministerial Council Decision No. 4/03; OSCE Ministerial Council Decision No. 10/05; OSCE Ministerial Council Decision No. 3/13; and OSCE Ministerial Council Decision No. 08/14.

¹⁵⁹ OSCE/ODIHR, *Belief, Dialogue and Security*, pp. 8-9.

¹⁶⁰ OSCE/ODIHR, *FoRB Security Guide*, pp. 21-22.

Recommendation

States should promote, support and facilitate open and transparent interfaith and interreligious dialogue and partnerships in order to combat intolerance and discrimination on grounds of religion or belief, build relationships of openness and trust, and foster greater tolerance, mutual respect and understanding in society.

Examples of good practice

The Dublin City Interfaith Forum (DCIF) works with interested members of religious or belief communities to deliver interfaith gatherings and activities in Dublin City. Established in 2012, the DCIF engages representatives of seven faiths and communities: Christian, Jewish, Muslim, Bahá'í, Hindu, Sikh and Buddhist. Through its 'Safe Haven' project, the DCIF seeks to combat all forms of hate crime through engagement with religious or belief communities, civil society, relevant government agencies and intergovernmental agencies to ensure effective reporting, recording, responding and referral.¹⁶¹

Albania has received recognition as a model of peaceful coexistence among diverse religious communities in Europe, including in the 2018 international conference (ICID) 'Albania, a Model of Interfaith Harmony for Europe?' This is the result of many complementary efforts at the country level.¹⁶²

Albania has an Interreligious Council that includes representatives of the five largest religious communities in the country (Sunni Muslim, Orthodox Christian, Catholic Christian, Bektashi Muslim and Evangelical Christian). One of the Council's key objectives is to combat misperceptions and disinformation about religion in society through the promotion of interfaith understanding among younger generations. The Council has focused on increasing the inclusion of women and youth, including by establishing a Department for Women and Youth, which organizes dialogue and interfaith study trips across the country. To counter misinformation and the potential spread of hostility, the Council issues statements before elections, during social crises (such as COVID-19) and after trigger events. The Council has received widespread recognition and several national and international awards for its efforts.

¹⁶¹ Dublin City Interfaith Forum website and their *Safe Haven Leaflet*.

¹⁶² Information on this example of good practice was provided to ODIHR for the purpose of reproduction in this Guide by Associate Professor Dr Genti Kruja, member of the ODIHR Panel of Experts on Freedom of Religion or Belief, and Secretary General of the Interreligious Council of Albania; See also, OSCE/ODIHR, *Belief, Dialogue and Security*, p. 57.

Since 2015, the Islamic, Catholic and Orthodox theological departments at two local universities — Bedër College University and Logos College University — have hosted 13 interfaith symposiums to bring together students and professors to discuss topics aimed at fostering dialogue and understanding between different religious communities and to conduct interfaith visits to mosques and Christian places of worship.

Building on this tradition, delegations from various countries have organized summer schools on interfaith dialogue in Albania, in cooperation with theological departments and the Interreligious Council of Albania. These programmes provide an opportunity for students and religious leaders from around the world to come together, learn from each other's experiences, and collaborate on fostering greater understanding and peace across faiths.

Checklist for states to create an enabling environment for interfaith dialogue¹⁶³

Assessing the need	<ol style="list-style-type: none"> 1. The problem to be addressed and the desired outcome. Has a situational analysis been performed to understand the broad context? 2. Prioritization versus legal obligation. Have the legal implications of a response been considered? 3. Strategic fit. Have you considered how it relates to the state's wider activities, goals and outcomes?
Assessing the context	<ol style="list-style-type: none"> 4. Perception of the state. Has the way your state is perceived by potential participants from different faith and belief communities been factored in? 5. Initiative and stakeholder mapping. How up-to-date is your understanding of similar activities and the actors in your state? 6. Framing local disputes and tensions. How are you factoring in the experiences of different faith and belief communities as they relate to your state?

¹⁶³ OSCE/ODIHR, *Belief, Dialogue and Security*, pp. 78-86.

Internal readiness	<ol style="list-style-type: none"> 7. Internal diagnosis and readiness to act. Have you considered the skill set, capacity and experience of your team to achieve successful outcomes? 8. Action Plan. Have you developed robust documents to clearly articulate the purpose and future direction of the support and established what success will look like? 9. Preparing clear channels of communication. Have you established a process to communicate information about the initiative to diverse stakeholders? 10. Preparing suitable venues. Have you considered the practical logistics for participants?
Engaging with religious or belief communities	<ol style="list-style-type: none"> 11. Outreach to religious or belief communities and other civil society actors. Do you have a fully articulated approach to reaching out to and engaging with those actors? 12. Inclusive and equal participation in state-supported processes. How are inclusion practices (particularly as they relate to religion, age and gender) mainstreamed in the work of your state? 13. Integrating a human rights-based approach in all interactions with religious or belief communities. How are human rights approaches embedded in the work that you do in your state? 14. Platforms to disseminate good practices and encourage levelling up. Have you considered how to provide opportunities for new partnerships to form between faith and belief communities in your state through the delivery of a dialogue or joint action?
Creating an enabling environment	<ol style="list-style-type: none"> 15. Ensuring that educational policies actively promote human rights, including respect for freedom of religion or belief and an appreciation for religious/belief pluralism and diversity. How might public education in your state inform the ability of faith and belief communities to contribute positively to dialogue or joint actions? 16. Speaking out against hatred and acting to prevent hate crimes. How might hate crime prevention policies in your state inform the ability of faith and belief communities to contribute positively to dialogue or joint actions? 17. Ensuring even-handedness, transparency and accountability in supporting dialogue initiatives. Are support/funding opportunities open to faith and belief communities implemented in an impartial, transparent and accountable manner? 18. Creating visibility for positive initiatives at various levels (including overseas). Do you give public recognition to positive examples of dialogue and collaboration across religious or belief boundaries to tackle concrete problems, within a human rights framework?

3. COLLECTING DATA ON ANTI-CHRISTIAN HATE CRIMES, INCLUDING IN COORDINATION WITH CHRISTIAN COMMUNITIES AND CIVIL SOCIETY

Under-reporting by victims and under-recording by law enforcement remain significant barriers to effectively addressing hate crimes, including those targeting Christians, across the OSCE region. Accurate and reliable data collection on anti-Christian hate crimes is essential for developing effective responses. Robust data collection and monitoring mechanisms not only support thorough investigation and prosecution of hate crimes but also enable evidence-based policymaking and transparent communication with affected communities and the wider public about efforts to address the problem.¹⁶⁴

The police provide the first response to hate crimes, and the information they collect forms the foundation of official hate crime data. It is therefore crucial that they have the necessary knowledge to correctly identify hate crimes, along with appropriate recording mechanism or forms to document them accurately.¹⁶⁵ When first responders are trained to recognize a potential hate crime, engage empathetically with the victims and initiate appropriate investigations, it sends a clear and powerful message that such crimes are taken seriously and will be addressed with urgency and professionalism.¹⁶⁶

Recommendation:

Governments should collect data on hate crimes, including those specifically motivated by anti-Christian bias. Police, as first responders to crimes, should ensure that potential anti-Christian hate crimes are classified and recorded as such.

Examples of good practice

As of 2023, 14 OSCE pSs were able to record anti-Christian hate crimes using a data collection mechanism and reported these data to ODIHR: Austria, Bosnia and Herzegovina, Canada, Croatia, Denmark, Finland, Germany, Moldova, the Netherlands, Poland, Romania, Slovakia, the United Kingdom and the United States. Other countries register anti-Christian hate crimes under a general category of hate crimes based on religion or belief (Belgium, Georgia, Greece, Hungary, Ireland, Lithuania, Malta, Norway, Serbia and Spain).¹⁶⁷

At the same time, anti-Christian incidents from 2023 were reported to ODIHR by civil society and intergovernmental organizations covering the following 36 states:

¹⁶⁴ OSCE/ODIHR, *Hate Crime Data Collection and Monitoring*, p. 11.

¹⁶⁵ *Ibid.*, p. 11.

¹⁶⁶ OSCE/ODIHR, *Preventing and responding to hate crimes*.

¹⁶⁷ *Anti-Christian hate crime (2023)*, OSCE/ODIHR Hate Crime Report.

Armenia, Austria, Belarus, Belgium, Bosnia and Herzegovina, Croatia, Denmark, Estonia, Finland, France, Georgia, Germany, Greece, Hungary, Ireland, Italy, Kazakhstan, Latvia, Lithuania, the Netherlands, North Macedonia, Norway, Poland, Portugal, Romania, Serbia, Slovakia, Spain, Sweden, Switzerland, Tajikistan, Türkiye, Ukraine, the United Kingdom, the United States of America and Uzbekistan. Anti-Christian hate incidents that took place in the Kosovo region were also reported to ODIHR as part of its 2023 Hate Crime Report.

In 2019, to ensure cooperation and coordination between the Greek state authorities at all levels, the General Secretariat for Religious Affairs and the General Secretariat of Public Order of the Ministry of Citizen Protection signed a Memorandum of Understanding on collecting and recording official data on acts against religious sites in Greece and on determining and implementing further action. The Memorandum also established cooperation between the two Secretariats on matters of mutual interest, such as staff training to address intolerance, including against Christians, as well as interreligious dialogue.¹⁶⁸

The United States Federal Bureau of Investigation (FBI) has been collecting and publishing hate crime statistics since 1992. Initially, they only collected data on hate crimes in which the perpetrators acted based on a bias against the victim's 'race', colour, religion or national origin. In 2009, they expanded the scope to include crimes committed based on biases of actual or perceived gender, sexual orientation, gender identity or disability. The data is highly disaggregated, with anti-Christian hate crimes tracked on the following biases: anti-Catholic, anti-Protestant, anti-Eastern Orthodox, anti-Church of Jesus Christ of Latter-Day Saints, anti-Jehovah's Witness and other bias against other Christian denominations.¹⁶⁹

Governments can take several practical steps to enhance hate crime data recording and collection, and to ensure that all relevant bias motivations, including anti-Christian bias, are accurately recorded:¹⁷⁰

- Adopt and enforce clear hate crime legislative and policy frameworks that are specific, practical and aligned with relevant OSCE commitments. These frameworks should cover all aspects of a comprehensive hate crime response, including recording, investigation, prosecution, and victim support. At the request of a participating State, ODIHR can assist by reviewing draft or existing legislation, policy frameworks, and operational tools;

¹⁶⁸ *Acts Against Religious Sites in Greece*, Ministry of Education and Religious Affairs, General Secretariat for Religious Affairs, Directorate for Religious Education and Interfaith Relations, Department for Religious Freedoms and Interfaith Relations, General Secretariat for Religious Affairs, Ministry of Education and Religious Affairs, 2019, p. 28.

¹⁶⁹ *FBI Crime Data Explorer (CDE)*, Federal Bureau of Investigation (FBI).

¹⁷⁰ *OSCE/ODIHR, Hate Crime Data Collection and Monitoring*, pp. 41-44.

- Implement a common, comprehensive and user-friendly monitoring definition of hate crimes to be consistently used by all criminal justice agencies for data recording and collection. This definition should encompass all bias motivations listed in national legislation, as well as additional relevant bias motivations based on the national or local context. This approach enables the collection of data on anti-Christian hate crimes even in countries where ‘religion’ or ‘anti-Christian’ is not explicitly included in hate crime laws;
- Establish a robust hate crime data recording and collection system that captures all agreed bias motivations. Because different groups may be affected in different ways, data should be collected and analysed by separate bias categories to enable an effective response by law enforcement in terms of targeted measures and allocation of resources.¹⁷¹ The system should specifically allow for the recording and tracking of anti-Christian hate crimes and include disaggregated data by each type of offence and bias motivation;
- Develop a comprehensive training programme to ensure that law enforcement officers and other relevant personnel are equipped with the knowledge and skills needed to use the data collection system correctly;
- Adopt policies requiring law enforcement officers to provide detailed documentation of hate crimes during the initial reporting process. Officers should record all relevant indicators of an anti-Christian bias motivation, and consider the victim’s perception. The policies should also include measures to ensure that officers take the victim’s perception into account. These policies must also ensure that no discrimination occurs on the basis of religion or belief;¹⁷²
- Conduct victimization surveys to assess the extent of under-reporting and the reasons for this;¹⁷³
- Publish collected data regularly, including statistics, analysis and findings from victimization surveys. This data should be made accessible both online and in print, and proactively shared through press releases, newsletters and media outreach; and
- Analyse collected data to evaluate and strengthen policy responses. The analysis should provide insights into the nature and scope of anti-Christian hate crimes, the effectiveness of law enforcement strategies, gender-differentiated impacts, and other relevant issues.

¹⁷¹ *Ibid.*, p. 14.

¹⁷² UNGA, A/HRC/RES/16/18, para. 6(a).

¹⁷³ See Mapping Unreported Hate Crimes Using Respondent-driven Sampling: A Methodology, OSCE/ODIHR, 7 November 2018.

ODIHR offers a range of assistance programmes designed to enhance hate crime monitoring and data collection systems. It also provides training for law enforcement on effectively responding to hate crimes (see the example of good practice below). These programmes can be implemented in OSCE pSs upon request.¹⁷⁴

Recommendation

Governments should take practical steps to strengthen hate crime data collection and monitoring systems, including through legislation, policy development, improved recording mechanisms, training programmes, victimization surveys, data publication and ongoing review and evaluation.

Examples of good practice

ODIHR has developed an assistance programme entitled Information Against Hate Crimes Toolkit (INFAHCT), aimed at improving systems for monitoring and collecting data on hate crimes.¹⁷⁵ INFAHCT achieves this by helping to build and strengthen the policies and capacities of national institutions and other structures to collect data on hate crimes.¹⁷⁶

Since 2012, ODIHR has implemented its Training against Hate Crimes for Law Enforcement (TAHCLE) programme in 18 OSCE pSs: Armenia, Bulgaria, Croatia, Estonia, Finland, Georgia, Iceland, Italy, Latvia, Lithuania, Malta, Montenegro, North Macedonia, Poland, Romania, Slovakia, Spain and Türkiye. It has also been implemented in the Kosovo region and in the municipality of Valencia, Spain. The TAHCLE programme is designed to improve the skills of law enforcement officers in recognizing, understanding and investigating hate crimes.

Since 2014, ODIHR's Prosecutors and Hate Crimes Training (PAHCT) programme has been implemented in ten pSs: Armenia, Bulgaria, Czechia, Georgia, Iceland, Montenegro, Malta, North Macedonia, Poland and Slovakia, as well as in the Kosovo region, while PAHCT materials have been used for training in a further five countries.¹⁷⁷

¹⁷⁴ Although not part of the scope of this Guide, effective prosecution of anti-Christian hate crimes is also essential. For more information, see: *Prosecuting Hate Crimes: A Practical Guide*, OSCE/ODIHR, 29 September 2014 and OSCE/ODIHR, *Hate Crime Prosecution at the Intersection of Hate Crime and Criminalized 'Hate Speech'*.

¹⁷⁵ For more information see OSCE/ODIHR, *Training Against Hate Crimes for Law Enforcement (TAHCLE): Programme Description*.

¹⁷⁶ For more information see *Information Against Hate Crimes Toolkit (INFAHCT): Programme Description*, OSCE/ODIHR, 29 August 2018.

¹⁷⁷ For more information see *Prosecutors and Hate Crimes Training (PAHCT): Programme Description*, OSCE/ODIHR, 29 September 2014.

PAHCT is designed to increase the skills of prosecutors in recognizing, investigating and prosecuting the full range of hate crimes, including those motivated by anti-Christian bias.

The General Social Survey on Canadians' Safety (GSS) has been carried out every five years since 1985 in order to understand Canadians' perceptions of crime and the justice system, as well as their experiences of crime victimization. It is a national survey of self-reported victimization and is an important source of information to complement official crime records, given that not all crimes are reported to the police. Survey results are used by police departments, all levels of government, victim and social service agencies, community groups and researchers to better understand the nature and extent of victimization in Canada.¹⁷⁸

Working with Christian communities and civil society to collect hate crime data

Civil society organizations play a key role in monitoring, documenting and reporting hate incidents to the authorities. It is essential for government agencies to cooperate with Christian communities, Christian organizations and wider civil society groups, especially those focused on advancing human rights and tolerance and non-discrimination, to collect, share and verify data on anti-Christian hate crimes. Such collaboration fosters a more comprehensive understanding of the issue by addressing victim under-reporting and helps to build greater trust between communities and authorities. Effective ways to strengthen government-civil society collaboration on data collection include:

- Establish a national working group or coordination mechanism on hate crime data collection, including representatives from all government agencies as well as key Christian and civil society organizations focused on hate crimes and working with vulnerable populations;¹⁷⁹
- Formalize cooperation between government and civil society through memoranda, protocols or data-sharing agreements. These agreements should include provisions for anonymizing exchange data to protect personal information when necessary;
- Collaborate with Christian communities, Christian organizations and other third-party reporting mechanisms¹⁸⁰ to establish accessible and confidential reporting channels for recording anti-Christian hate crimes; and

¹⁷⁸ General Social Survey – Canadians' Safety (GSS), Statistics Canada, 2019.

¹⁷⁹ OSCE/ODIHR, *Hate Crime Data Collection and Monitoring*, p. 41.

¹⁸⁰ Third-party mechanisms allow victims to report a potential crime to an authority, organization, centre or service other than the police. *Underpinning victims' rights – Support services, reporting and protection*, FRA, 2023.

- Strengthen the capacity of Christian communities, Christian organizations and wider civil society groups to record and report hate crime data by offering tailored training initiatives, either directly or in partnership with civil society organizations.

Recommendation

Government agencies should cooperate with Christian communities, Christian organizations, and wider civil society in the collection, recording, sharing and analysis of data on anti-Christian hate crimes. This helps produce more accurate statistics and addresses the challenges of hate crime under-reporting and under-recording.

Example of good practice

Jehovah's Witnesses branch offices in the OSCE region receive reports of incidents motivated by anti-Christian bias on a continuous basis. Before registering them as potential anti-Christian hate crimes, the branch offices review the incidents for accuracy and alignment with the OSCE concept of hate crime. The data collected through this system has multiple uses, including:¹⁸¹

- Collaboration between the local branch offices and national authorities for inclusion in national statistics, when viable and applicable (such as in Spain);
- Reporting to ODIHR's Hate Crime Report, coordinated by the Jehovah's Witnesses Headquarters;
- Annual reporting of incidents at the country and regional level; and
- Strategic litigation before the European Court of Human Rights (such as *Kornilova v. Ukraine* and *Begheluri and Others v. Georgia*).¹⁸²

¹⁸¹ Information provided to ODIHR by the Jehovah's Witnesses Headquarters office for the purpose of reproduction in this Guide.

¹⁸² *Kornilova v. Ukraine*, Application no. 47283/14, ECtHR, 12 November 2020 and *Begheluri and Others v. Georgia*, Application no. 28490/02, ECtHR, 7 October 2014.

4. BUILDING TRUST BETWEEN THE GOVERNMENT AND CHRISTIAN COMMUNITIES

Effectively addressing anti-Christian hate crimes by implementing the steps outlined in this Guide can help significantly in building trust between Christian communities and government authorities. In addition, governments should establish formal channels of consultation and coordination to deepen this trust. Engaging in ongoing, open, transparent and inclusive communication with Christian communities about the security threats and challenges they face offers several key benefits including:

- Ensuring broad-based and sustainable security, by recognizing the important role that religious or belief communities can play in addressing security-related concerns, and encouraging their proactive involvement in such efforts;¹⁸³
- Building confidence in the government's willingness and commitment to addressing the pressing challenges facing religious or belief communities;
- Enhancing government officials' understanding of the specific challenges related to anti-Christian hate crimes and the associated security concerns of Christian communities; and
- Ensuring that government responses to hate crimes are better aligned with the needs, perspectives and experiences of Christian communities.

Authorities should strive to engage with the full diversity of Christian communities, including newly established and smaller groups. While the primary contact will typically be with the leaders or designated representatives of the communities, efforts should be made to engage with a broad cross-section of the community, including women and young people, in order to hear their perspectives and experiences while respecting the community's internal governance and its right to manage its own affairs.¹⁸⁴ Broader engagement is essential for building trust with the entire community, rather than relying on a select few individuals.

Consultation and coordination initiatives between governments and Christian communities must respect the voluntary nature of participation and ensure that channels of communication remain open at all times. These efforts should extend beyond the national level and also include local or municipal levels.¹⁸⁵ Formalizing such coordination, for example, through a Memorandum of Understanding, can be an effective way to ensure that collaboration is sustainable and consistent, rather than sporadic.

¹⁸³ OSCE/ODIHR, *FoRB Security Guide*, p. 23.

¹⁸⁴ A/HRC/52/38 *Landscape of freedom of religion or belief*. Report of the Special Rapporteur on freedom of religion or belief, Nazila Ghanea, United Nations General Assembly, 30 January 2023, paras. 45-46.

¹⁸⁵ OSCE/ODIHR, *FoRB Security Guide*, pp. 22-23.

Recommendation

Governments should build trust with Christian communities by establishing formal channels of communication and co-ordination with them. The communication should be two-way, open and transparent, and should strive to engage with the full diversity of Christian communities ensuring, where practically possible and respectful of the internal governance of the communities concerned, the involvement of women and young people.

Examples of good practice

In Norway, there has been formalized dialogue and discussion between the government and different religious and life stance communities since the 1990s. The government believes this dialogue is essential to achieving an open and tolerant society where everyone has knowledge of and respects each other's beliefs and life stance. For instance, in November 2023, the Prime Minister and the Minister of Children and Families held a dialogue meeting with religious and life stance communities on the situation in the Middle East and its effects on Norway. The groups invited to the dialogue meeting included the Church of Norway, the Jewish Community of Oslo, the Islamic Council of Norway, the Muslim Dialogue Network, the Christian Council of Norway, the Roman Catholic Diocese of Oslo and the Council for Religious and Life Stance Communities.¹⁸⁶

In Uzbekistan, a Council for Confessions has been created under the Committee on Religious Affairs as a platform to ensure close cooperation with religious organizations, develop joint proposals and measures for interreligious and interethnic peace and cohesion, and discuss and assist the rights, responsibilities and activities of various confessions. Representatives from 16 religious groups are members of the Council for Confessions, including several Christian denominations such as the Russian Orthodox Church, the Roman Catholic Church, the Union of Evangelical Christians-Baptists, the Armenian Apostolic Church, the Seventh-day Adventist Church, the New Apostolic Church, the Evangelical Lutheran Church, the Church of the "Voice of God" and Jehovah's Witnesses.¹⁸⁷

¹⁸⁶ Dialogue meeting with religious and life stance communities, Government of Norway, 8 November 2023.

¹⁸⁷ Inter-confessional council, Committee on Religious Affairs of the Republic of Uzbekistan, 21 April 2024.

Building trust between Christian communities and law enforcement

Consultation and coordination should also underpin relations between Christian communities and law enforcement at both national and local levels. Regular and open channels of communication, involving both senior leadership and frontline police officers, help build trust and ensure that responses to security challenges are tailored to the specific needs of Christian communities. Several measures can be taken to foster trust between law enforcement and Christian communities:

- Law enforcement agencies should establish formal or informal platforms that allow representatives from different Christian communities to regularly communicate their security needs and concerns, as well as provide feedback on security measures implemented by the authorities;
- Law enforcement agencies should appoint a dedicated liaison officer to serve as the primary point of contact with Christian communities, addressing concerns related to anti-Christian hate crimes. The officer's role should include building strong relationships with Christian communities and ensuring ongoing communication;
- Police officers should make regular visits to local Christian places of worship, community centres and institutions to cultivate relationships with community members and representatives; and
- Law enforcement agencies should work with local Christian communities to organize workshops that introduce police officers to the community, its history, religious traditions, activities and the specific challenges they face with regard to intolerance and hate crimes.

Recommendation

Law enforcement should build trust with Christian communities through consistent consultation and co-ordination, using measures such as appointing liaison officers, conducting visits to local Christian communities, and organizing joint workshops.

Example of good practice

In the United States, the social change organization MovementForward launched the OneCOP initiative in 2016, which pairs officers at precinct level with local faith-based organizations to facilitate positive, ongoing partnerships between local law enforcement agencies and diverse congregations of every faith tradition. A total of 2,000 houses of worship currently participate in the initiative, and community members

report an average rating of 4.8 out of 5 when asked to assess their perception of law enforcement after the programme.¹⁸⁸

Since 2020, MovementForward, in collaboration with the U.S. Department of Justice and sponsored by the Motorola Solutions Foundation, convenes the National Faith & Blue Weekend to reinforce connections between law enforcement professionals and the communities they serve through houses of worship. The campaign represents every major national law enforcement membership and professional organization in the United States and every faith tradition.¹⁸⁹

5. WORKING WITH CHRISTIAN COMMUNITIES TO EFFECTIVELY ADDRESS HATE CRIME-RELATED SECURITY THREATS AND NEEDS

Security considerations vary across pSs, influenced by factors such as the level of awareness of threats facing Christian communities and the resources available to government agencies to address their security needs. In response to recent attacks on Christian places of worship and events, many Christian communities have introduced additional security measures. However, across the OSCE region, these communities often face challenges due to limited expertise, funding and personnel, partly because they have historically faced fewer threats compared to some other religious or belief communities.

By working together, law enforcement agencies and Christian community representatives can assess security needs of the community more effectively, particularly around places of worship and community facilities, and take coordinated action to ensure adequate protection for potential targets.

Risk assessments

It is essential that measures to address the security needs of Christian communities — including the protection of places of worship and other community facilities — are guided by thorough risk assessments that identify all relevant security concerns. Where such assessments do not exist, law enforcement agencies should support Christian communities in developing and conducting them, including by undertaking security surveys for places of worship and other facilities. Where risk assessments are already in place, law enforcement can assist by reviewing, updating or offering feedback to strengthen their effectiveness.

¹⁸⁸ OneCOP, MovementForward.

¹⁸⁹ Faith & Blue, MovementForward.

Crisis management systems

Based on the findings of the risk assessment, authorities should support Christian communities in strengthening their security planning and preparedness for potential crisis scenarios. It is crucial, however, to ensure that any security measures do not impose undue limitations on the full and free exercise of freedom of religion or belief by Christian individuals and communities.¹⁹⁰ A fine line exists, for example, between ensuring the safety of worshippers and maintaining places of worship as open and welcoming spaces for all members of the community and the wider public.

To this end, it is recommended that authorities at all levels draw on expertise, resources, and tools when developing and implementing efforts to address the security needs of Christian communities. This includes materials on the security of religious or belief communities developed by or on behalf of international organizations and other actors.¹⁹¹ Such support could also include:

- Collaborating with Christian communities that wish to develop community emergency protocols and/or security plans by providing technical and specialized input on the security risks and appropriate security measures;
- Advising Christian communities on the security measures they choose to implement, including lock-up procedures, installation and maintenance of security equipment, such as alarms, exterior lighting, closed-circuit television (CCTV), metal detectors, security guards and controlling access to places of worship and community buildings. It is important to note that implementing enhanced security measures in historic Christian places of worship may require advance approval from the authorities;
- Providing guidance to Christian communities on developing emergency plans, crisis management systems, setting up internal communication mechanisms, and coordinating a joint response in the event of an attack;
- Providing training to strengthen the capacity of Christian communities to respond to security threats, including specialized training for security focal points appointed by the community; and

¹⁹⁰ OSCE/ODIHR, *ForB Security Guide*, p. 6.

¹⁹¹ Relevant resources include, but are not limited to: OSCE/ODIHR, *Understanding Anti-Semitic Hate Crimes*; OSCE/ODIHR, *Understanding Anti-Muslim Hate Crimes*; OSCE/ODIHR, *ForB Security Guide*; SOAR Security by Design APP, SOAR; Security Tips videos, SOAR; Incident Management Guide for Faith Communities, SOAR; 10 Tips for women walking to and from a place of worship, SOAR; Security by Design. Guidebook for Religious Sites, PROSPeReS; Guidebook on security measures for religious sites & communities, PROSPeReS; Threats and Vulnerabilities of Places of Worship, SHRINEs; A Practical Guide to Law Enforcement for Safer and Stronger Communities in Europe, SASCE; Protect Your Community. Guide for Leaders and Staff Members, SASCE; Protect Your Community. Guide for Community Members, SASCE.

- Organizing joint drills and emergency exercises for Christian communities, focused on security focal points, to ensure effective responses to various emergency scenarios. Best practices from measures implemented during the COVID-19 pandemic to protect public health in places of worship — e.g., stewarding, signage, registration and audits — can provide valuable insights for these exercises.

In addition to collaborating with law enforcement on security measures, Christian communities are also recommended to learn from other religious or belief communities targeted by hate crimes and facing similar security challenges, in particular Jewish and Muslim communities.

Recommendation

Law enforcement agencies should support Christian communities in conducting risk assessments and implementing measures, based on the results, to strengthen their security and preparation for crises.

Examples of good practice

In March 2023, the ‘Strengthening Security and Resilience of At-Risk Religious Sites and Communities’ (SOAR) Project organized a two-day leadership retreat to gather representatives from different faith groups in Germany to receive specialist leadership training and detailed support towards developing a plan of action and support for at-risk communities.¹⁹² Based on the project’s Church Incident Management Guide,¹⁹³ the faith leaders participated in practical exercises on risk assessment, incident management, incident response and communications.

A week later, there was a violent attack at a Jehovah’s Witness meeting hall in Hamburg in which several people were killed. Worried that other incidents might occur, leaders from the Christian network that attended the SOAR Project training applied the Church Incident Management Guide to effectively coordinate among themselves and with law enforcement.

¹⁹² SOAR European Management Retreat – Munich, Strengthening the Security and Resilience of At-Risk Religious Sites and Communities (SOAR), March 2023.

¹⁹³ Incident Management Guide for Faith Communities, SOAR.

In Dresden, Germany, the Catholic Diocese of the Old Catholics in Germany has established various communication methods to effectively respond to security concerns.¹⁹⁴

Dialogues with police contact points assigned by the Ministry of the Interior of Saxony

- Active exchanges with other Christian denominations and Jewish and Muslim communities
- A national monthly magazine (*Christen heute*)
- Facebook communications
- E-mailing lists
- A crisis management team channel on WhatsApp

Based on the lessons learned in the Jewish community, the Community Security Trust (CST) provides training to members of churches, mosques and other places of worship in the United Kingdom on safety and security against violence, extremism and hate crime. The Security Advice for Everyone (SAFE) training programme includes sessions on crisis management, security plans, risk assessment, event security, effective communication in high-stress situations, women's safety and online security, among others.¹⁹⁵

Financing

Given the financial burden Christian communities face in implementing security measures, governments and international organizations should consider providing financial assistance to help meet their security needs of Christian communities, for example, by funding security personnel or installing protective equipment in places of worship. In order to seek available technical and financial support without fear, these communities must have trust in the authorities.

Examples of good practice

The EU Internal Security Fund (ISF) is a funding scheme that distributes funding to civil society coalitions across Europe every two years to implement projects related to the prevention of and response to threats and incidents in places of worship.¹⁹⁶ Some projects financed by the ISF include:

¹⁹⁴ SOAR Management Retreat in Munich – Interview with Hans Tuschling, Specialist in Prevention at the Ministry of the Interior of Saxony, SOAR.

¹⁹⁵ SAFE Security Advice for Everyone Webinar, CST.

¹⁹⁶ Internal Security Fund (2021-2027), European Commission, 24 October 2024.

- The ‘Strengthening Security and Resilience of At-Risk Religious Sites and Communities’ (SOAR) Project;¹⁹⁷
- The ‘Protection System for Large Gatherings of People in Religious Sites’ (PROSPeReS) Project;¹⁹⁸ and
- Raising Awareness for the Protection of Places of Worship by Promoting Interfaith Dialogue on the Use of Advanced Technologies (SHRINEs) Project.¹⁹⁹

In 2024, the Government of Canada launched the Canada Community Security Program (CCSP) to replace the previous Security Infrastructure Program (SIP) based on feedback from organizations regarding more flexibility to respond to community needs. To protect the safety and security of all Canadians, the CCSP provides time-limited funding and support for communities at risk of hate-motivated incidents/crime to enhance security measures at their gathering spaces. Through the CCSP, Christian organizations can request coverage of up to 70 per cent of expenses related to security equipment, minor renovations to enhance security, security and emergency assessments and plans, training and time-limited security staff for their places of worship, community centres, offices and cemeteries.²⁰⁰

Protection in case of heightened risk

Security risk assessments and analysis of available hate crime data by law enforcement can help identify crime patterns and ‘hotspots’ where anti-Christian incidents are more likely to occur. This information can, in turn, support advocacy for both political and practical action. In this context, law enforcement can take several practical steps to protect Christian places of worship and other sites potentially at risk of attack:

- Christian communities should be promptly informed whenever a specific threat is identified or when the overall threat level changes. The strategic use of established channels of communication between law enforcement and Christian communities is vital for effective emergency response;
- Additional police protection should be provided at locations that are likely to be the targeted in anti-Christian attacks, including places of worship, cemeteries, monuments, and other Christian facilities;

¹⁹⁷ SOAR Project – Protecting Places of Worship.

¹⁹⁸ PROSPERES Protection System for large gatherings of people in Religious Sites.

¹⁹⁹ SHRINEs – Raising Awareness for the protection of places of worship by promoting interfaith dialogue on the use of advanced technologies.

²⁰⁰ The Canada Community Security Program (CCSP), Canada – Public Safety Canada, 20 December 2024.

- Resources should be allocated to enhance security measures, increase police presence, and conduct regular patrols during periods when anti-Christian hate crimes are more likely, such as during high-profile political or media events associated with anti-Christian rhetoric;
- Extra protection and appropriate safety measures, including traffic and crowd management, should be implemented during key times, such as major Christian holidays and festivals. For example, Christian places of worship and celebrations may face heightened risks during Christmas or Easter; and
- Technology should be employed for cost-effective security solutions. These can include secure communication systems, data protection tools, online activity monitoring, geolocation technologies and unmanned aerial vehicles (drones). In deploying such tools, states must ensure that the use of surveillance technologies does not violate freedom of thought, privacy and other human rights.²⁰¹

Recommendation

Law enforcement should consider implementing enhanced security and safety measures to protect Christian places of worship and other related facilities during periods of elevated risk, such as Christian holidays or in the aftermath of high-profile events, whether domestic or international, that could affect the security of Christian communities.

Example of good practice

In line with the reinforced terrorism risk level classification for Holy Week issued by the Ministry of the Interior of Spain, the Municipality of Seville reinforced the safety system for religious processions and celebrations during the 2023 Easter week. The preventive approach included the deployment of 4,129 agents of the Spanish National Police, Civil Guard and Local Police of Seville, as well as volunteers from the Seville Civil Protection group. Additional measures included the use of drones for crowd monitoring, 30 cameras to ensure a permanent view of all critical points and anti-panic lights.²⁰²

²⁰¹ A/76/380: Interim report of the Special Rapporteur on freedom of religion or belief, Ahmed Shaheed: Freedom of thought, 5 October 2021, paras. 52 and 97.

²⁰² El dispositivo de seguridad para la Semana Santa 2023 contará con un refuerzo para alcanzar los 4.129 agentes entre Policía Nacional, Guardia Civil y Policía Local de Sevilla, Municipality of Seville, 28 March 2023 (in Spanish).

6. REASSURING THE COMMUNITY IN THE EVENT OF AN ANTI-CHRISTIAN HATE CRIME

Anti-Christian hate crimes, like all hate crimes motivated by hatred based on religion or belief, should be condemned promptly and unequivocally by government officials and civil society, including other religious or belief communities, regardless of the severity of the offence. Even minor incidents can escalate quickly if ignored, and public condemnations can significantly bolster community confidence. By speaking out against hate crimes and incidents, political representatives can foster mutual respect and understanding helping to defuse tensions within society. Conversely, a delayed or inadequate response, such as condoning anti-Christian hate crimes or blaming the community, can amplify the impact of the incident and increase anxiety among affected groups. To reassure the Christian community following a hate crime, government officials and political representatives should:

- Promptly and unequivocally condemn the anti-Christian hate crime;
- Demonstrate solidarity with the victims and the wider Christian community by visiting the affected community and the targeted area or site as soon as possible after the incident, particularly if a Christian place of worship, community centre, monument or other facility is targeted;
- Participate in commemorative events or vigils alongside the Christian community; and
- Offer increased police protection and patrols to provide reassurance and demonstrate support to the community.

Recommendation

Government officials and political representatives at all levels should promptly and unequivocally condemn any anti-Christian hate crime and publicly express solidarity with the affected Christian communities.

Example of good practice

On the day of the attack against the Catholic Santa Maria church in Istanbul, President Erdoğan called the Church Priest Anton Bulai to extend his condolences to the community. The President also emphasized that the necessary steps had been taken to apprehend the perpetrators as soon as possible. Information about the President's support was posted on social media.²⁰³

Wider civil society, including other religious or belief communities, play a crucial role in managing the impact of significant anti-Christian incidents. The public, prompt and unequivocal condemnation of such incidents and attacks not only offers support and reassurance to the affected individuals and communities, but also fosters interfaith solidarity and strengthens social cohesion. This is a powerful affirmation of the principle that “an attack against one is an attack against all”. This is in line with the 2017 Beirut Declaration on “Faith for Rights” issued by faith-based and civil society actors, which articulates a “common vision of religious actors [...] for disarming the forces of darkness; and help dismantling the unholy alliance in too many hearts between fear and hatred. Violence in the name of religion defeats its basic foundations, mercy and compassion. We intend to transform the messages of mercy and compassion into acts of solidarity”.²⁰⁴

Recommendation

Wider civil society, including other religious or belief communities, play a crucial role in reassuring Christian individuals and communities after an incident or attack, particularly by publicly, promptly and unequivocally condemning anti-Christian hate crimes.

Example of good practice

The Interreligious Council of Bosnia and Herzegovina (IRC) is a national civil society organization founded in 1997 with the primary goal of fostering reconciliation among the peoples of Bosnia and Herzegovina following the Bosnian War. It was founded by the leaders of the Islamic Community, the Serbian Orthodox Church, the Roman Catholic Church and the Jewish Community of Bosnia and Herzegovina. The Council

²⁰³ President Erdoğan extends his condolences by phone to community of Santa Maria Church, Directorate of Communications, 28 January 2024.

²⁰⁴ Beirut Declaration on “Faith for Rights”, Office of the United Nations High Commissioner for Human Rights, March 2017.

collects information on hate incidents motivated by religious bias and regularly issues statements to condemn attacks, underscores the need for adequate investigation by law enforcement and informs the public about the actions taken by the police. For instance, the IRC condemned the desecration of a Roman Catholic Church in Mostar (June 2024); the attack against a Muslim religious school (madrassa) in Banja Luka (May 2024); and the vandalism of a Serbian Orthodox cemetery in the capital city of Sarajevo (December 2023). Although the Serbian Orthodox Church halted its participation in the IRC from February 2023 to May 2025, the Council continued to monitor, report on and condemn incidents targeting the Orthodox community across the country during this period.²⁰⁵

The wider public can also play a vital role in reassuring Christian communities after an incident or attack by acknowledging the anti-Christian nature of the incident and sending a clear message in support of religious and cultural diversity. Members of the public can demonstrate their commitment to fostering a society where Christians feel safe to openly express their religion and identity. When appropriate, governments and/or the media can amplify such supportive messages and initiatives, contributing to a more positive and rehabilitative environment.

Example of good practice

Father Jacques Hamel was killed in his church in Saint-Etienne-du-Rouvray, near Rouen, by two men who had pledged allegiance to a so-called Islamic State group in 2016. At the initiative of the French Centre for Muslim Worship and the Italian Muslim Religious Community, Muslims across France and Italy, in addition to political and Christian leaders, attended Catholic mass in a gesture of solidarity. The head of the local mosque was among those who attended mass after the attack and gave the following statement:

“For me, it is very important to be here today. [...] Today we wanted to show physically, by kissing the family of Jacques Hamel, by kissing His Grace Lebrun in front of everybody, so they know that the two communities are united.”

Dialogue between Father Hamel’s sister and the mother of one of his attackers led to the recognition of common values and the creation of a friendship, leading them to co-author a book on their shared grief.²⁰⁶

205 Information provided to ODIHR by the OSCE Mission to Bosnia and Herzegovina for the purpose of reproduction in this Guide. See also *Međureligijsko vijeće u BiH (Interreligious Council of Bosnia and Herzegovina)*, Facebook.

206 Muslims in France, Italy attend Mass in solidarity with Fr Hamel, CNA, 1 August 2016; and Caroline de Sury, Sister of murdered French priest tells story of forgiveness, friendship with killer’s mother, *Detroit Catholic*, 7 March 2024.

7. PROVIDING SUPPORT TO THE VICTIMS OF ANTI-CHRISTIAN HATE CRIME

A comprehensive national response to preventing and addressing hate crimes must prioritize the needs and rights of victims. In practice, however, the criminal justice system often falls short in meeting these specific needs, and the availability of specialist hate crime victim support remains limited.²⁰⁷

Sensitive and respectful treatment of hate crime victims is essential for fostering trust in the criminal justice process, empowering victims, and minimizing the broader impact of hate crimes on individuals and communities. To enhance support for anti-Christian hate crime victims, governments should:²⁰⁸

- Ensure that the legal framework recognizes hate crime victims as a distinct and vulnerable group, entitled to specific protection and support measures, and access to justice;
- Develop a coherent and effective victim support system that provides a comprehensive range of services for hate crime victims, including facilitating coordination between various government bodies and civil society organizations. OSCE pSs have specifically committed to cooperating with civil society to assist victims of hate crimes.²⁰⁹ A number of states have formal partnerships and cooperation agreements with civil society to enhance hate crime victim support;
- Ensure that victims of anti-Christian hate crimes have access not only to general victim support services, but also to specialist service providers with expertise in hate crime victimization and the specific needs of these victims;
- Implement effective Individual Needs Assessment (INA) and referral systems to ensure that services are tailored to the unique vulnerabilities and needs of each hate crime victim, while considering the gendered impact of hate crimes;
- Organize training and resources for criminal justice professionals and others who may come into contact with anti-Christian hate crime victims to guide sensitive and respectful interactions. Failure to adopt a victim-centred approach²¹⁰ by first responders and support providers can lead to secondary victimization resulting from inappropriate treatment by institutions and individuals;²¹¹ and

²⁰⁷ Comprehensive Support for Hate Crime Victims, OSCE/ODIHR, 23 April 2024.

²⁰⁸ Hate Crime Victim Support Building Blocks, OSCE/ODIHR, 26 April 2022; OSCE/ODIHR, *Hate Crime Victims in the Criminal Justice System*, pp. 10-14.

²⁰⁹ OSCE Ministerial Council, Decision No. 13/06; OSCE Ministerial Council Decision No. 9/09.

²¹⁰ See Part Two, key principles.

²¹¹ The Sensitive and Respectful Treatment of Hate Crime Victims, OSCE/ODIHR, 26 April 2022.

- Keep hate crime victims informed about the progress of their cases, including updates on both investigation and prosecution decisions.

Given the significant impact of hate crimes, access to hate crime victim support should not be dependent on the victim reporting the incident to the police or another organization, or engaging in criminal proceedings, nor on the incident qualifying as a crime under the applicable legal framework.²¹²

It is essential that those providing support to victims of anti-Christian hate crimes understand the specific characteristics of Christian communities, including their principal religious and cultural practices (see [Annexe 2](#)). Support providers should consider taking proactive steps to support and reassure the wider Christian community affected by a hate crime. This could include consulting with Christian communities and relevant victim support organizations to develop effective strategies for assisting victims.

Recommendation

Governments should develop coherent and effective victim support systems in cooperation with civil society organizations to ensure that victims of anti-Christian hate crimes receive sensitive, respectful and comprehensive support.

Example of good practice

ODIHR facilitates the exchange of good practices, standards and capacity-building activities to improve hate crime victim support. The Office works with experts, criminal justice professionals and policymakers in OSCE pSs to:

- Enhance the support to hate crime victims across the region; and
- Increase understanding and implementation of OSCE standards and EU laws on effective hate crime victim support.

²¹² OSCE/ODIHR, *HCVS Policy Brief*, pp. 16-17.

ODIHR's Enhancing Stakeholder Awareness and Resources for Hate Crime Victim Support (EStAR) project²¹³ and the ongoing initiative Strengthening Targeted Assistance and Response Structures for Hate Crime Victims in the OSCE Region (STARS)²¹⁴ offer a plethora of resources for stakeholders to build their capacity to improve hate crime victim support, including a training course for criminal justice professionals on the sensitive and respectful treatment of hate crime victims.²¹⁵

ODIHR has also developed an e-Learning course on Trauma-Informed Interviewing,²¹⁶ produced comprehensive guidance on trauma-informed National Referral Mechanisms²¹⁷ and organized an online seminar on 'Addressing the psychological needs of hate crime victims through a trauma-informed approach'.²¹⁸ These tools are designed to train human rights monitors, investigators, researchers and other professionals to conduct interviews in a trauma-sensitive manner, by employing tools and techniques that prevent the re-traumatization of interviewees and ensure respect for the human rights and dignity of victims.

An important consideration is the role of the media. Hate crimes often attract media attention owing to their nature as message crimes and their significant impact on victims' communities and the wider public. Authorities should proactively and accurately communicate about ongoing hate crime cases within the criminal justice system.²¹⁹ Additionally, it is recommended that hate crime victim support specialists engage with the media to encourage sensitive and responsible coverage, ensuring thoughtful reporting that helps protect against the vicarious impact of such crimes and reduces the risk of secondary victimization.²²⁰

213 Enhancing Stakeholder Awareness and Resources for Hate Crime Victim Support (EStAR), OSCE/ODIHR, 2020.

214 Strengthening Targeted Assistance and Response Structures for Hate Crime Victims in the OSCE Region (STARS), OSCE/ODIHR, 2023.

215 Sensitive and Respectful Treatment of Hate Crime Victims: Training Course for Criminal Justice Professionals, OSCE/ODIHR, 17 February 2022.

216 Trauma-informed interviewing: skills and techniques for monitors. The course is available on FreedomLab.io in English, Russian, and Ukrainian.

217 Guidance on Trauma-Informed National Referral Mechanisms and Responses to Human Trafficking, OSCE/ODIHR, 22 August 2023.

218 Addressing the psychological needs of hate crime victims through a trauma-informed approach, OSCE/ODIHR, 17 June 2024. The recording is available online.

219 OSCE/ODIHR, *Hate Crime Victims in the Criminal Justice System*, pp. 48-50.

220 OSCE/ODIHR, *HCVS Policy Brief*, p. 40.

Example of good practice

The Council of Media Ethics of Macedonia (CMEM) is a non-governmental organization, independent both of the media and the government, that works to build, upgrade, protect and promote professional standards and ethics among North Macedonia's media. With the support of the OSCE Mission to Skopje, the CMEM published the *Guidelines for Ethical Reporting for Online Media*, which include an approach to avoiding the promotion of perpetrators' ideologies, respecting the victims' privacy, sensitively handling information, regularly reviewing social media and user-generated content, exposing and raising awareness against 'hate speech', and the duty to report, delete and/or criticize extreme 'hate speech'.²²¹

²²¹ Guidelines for Ethical Reporting for Online Media (Application of the Code of Journalists in the online sphere), Council of media ethics of Macedonia.

PART FOUR:
Suggested Actions for Key
Stakeholders to Address
Anti-Christian Hate Crimes

This section outlines recommendations for the key actors involved in preventing and responding to anti-Christian hate crimes. They focus on the practical steps each actor can take to help address the issue, as well as potential partners for collaboration. They form part of a comprehensive and holistic approach to ensuring the security of all religious or belief communities. The recommendations underscore the importance of dialogue, respect and understanding, trust-building and cooperation among all stakeholders. Before implementing these recommendations, all actors are encouraged to read Parts 1-3 of this Guide to deepen their understanding of:

- The applicable OSCE commitments and international human rights standards to address the problem of anti-Christian hate crimes
- The contemporary manifestations of anti-Christian hate crimes, the contexts in which they occur, how to identify relevant bias indicators, and the impact these crimes have on Christian communities
- The key principles that should guide efforts to address anti-Christian hate crimes
- Examples of good practice from different OSCE pSs
- The resources and training programmes developed by ODIHR²²²

²²² See the TAHCLE programme, the Practical Guide on Data Collection, the Training Course on the Sensitive and Respectful Treatment of Hate Crime Victims, and the Resource Guide for Civil Society.

RECOMMENDATIONS

PARLIAMENT

Institutional level	<ul style="list-style-type: none"> • Enact specific, tailored legislation to address hate crimes, covering recording, investigation, prosecution²²³ and victim support. • Request a legal review from ODIHR on existing and draft legislation related to hate crimes. • Strengthen the understanding of anti-Christian hate crimes across parliament, including through setting up a parliamentary working group. • Initiate a parliamentary hearing on intolerance against Christians to raise awareness of the issue and identify if legal changes are required. • Develop policies to address intolerance against Christians. • Promptly and unequivocally condemn any anti-Christian hate crimes and publicly express solidarity with the affected Christian communities.
Individual level	<ul style="list-style-type: none"> • Reach out to the Christian communities in your constituency to find out about their concerns. • Build a coalition against intolerance against Christians by working with parliamentarians from your own and different parties, civil society, religious or belief communities and international parliamentary bodies. • Ensure that your language and behaviour conform to a rights-based standard for all communities and do not perpetuate or reinforce anti-Christian bias. • Treat hate crime victims in a sensitive and respectful manner to prevent secondary victimization.

²²³ For more detailed recommendations on the effective prosecution of anti-Christian hate crimes, see OSCE/ODIHR, *Prosecuting Hate Crimes*.

GOVERNMENT (INCLUDING POLICYMAKERS AND OTHER OFFICIALS)

Institutional level	<ul style="list-style-type: none"> • Strengthen the understanding of anti-Christian hate crimes across government, including through commissioning studies, disseminating civil society reports and setting up a cross-governmental working group. • Include Christian communities and institutions on lists of potential soft targets of crimes by violent 'extremists' or terrorists. • Implement awareness-raising campaigns about the need to counter anti-Christian hate crimes, in coordination with the media, religious or belief communities and civil society organizations. • Strengthen hate crime data recording and collection systems in order to ensure that accurate and reliable data on anti-Christian hate crimes is collected. • Periodically publish disaggregated hate crime data and conduct victimization surveys to complement official data. • Develop and implement training and capacity-building programmes for public officials, in particular law enforcement, on religious literacy and the respectful treatment of victims of anti-Christian hate crimes. • Set up coordination mechanisms with Christian communities and wider civil society to discuss concerns related to anti-Christian hate crimes, coordinate hate crime data collection and strengthen reporting channels. • Consider creating funding opportunities to address the security needs of Christian communities. • Promote, support and facilitate interfaith and interreligious dialogue and partnerships. • Promptly and unequivocally condemn any anti-Christian hate crimes and publicly express solidarity with the affected Christian communities.
Individual level	<ul style="list-style-type: none"> • Participate actively in training and capacity-building opportunities on religious literacy and the respectful treatment of victims of anti-Christian hate crimes. • Ensure that your language and behaviour conform to a rights-based standard for all communities and do not perpetuate or reinforce anti-Christian bias. • Treat hate crime victims in a sensitive and respectful manner to prevent secondary victimization.

NATIONAL HUMAN RIGHTS INSTITUTION (NHRI), OMBUDS-INSTITUTION, OR EQUALITY BODY

Institutional level	<ul style="list-style-type: none"> • Implement awareness-raising campaigns about the need to counter anti-Christian hate crimes, in coordination with the media, religious or belief communities and civil society organizations. • Engage with the media to challenge biased narratives about both majority and minority Christian denominations. • Develop and implement training and capacity-building programmes for public officials, in particular law enforcement, on religious literacy and the sensitive and respectful treatment of victims of anti-Christian hate crimes. • Monitor anti-Christian hate incidents and include information in reports regarding the implementation of OSCE commitments and international obligations on intolerance against Christians. • Conduct victimization surveys to complement official hate crime data. • Promptly and unequivocally condemn any anti-Christian hate crimes and publicly express solidarity with the affected Christian communities.
Individual level	<ul style="list-style-type: none"> • Ensure that your language and behaviour conform to a rights-based standard for all communities and do not perpetuate or reinforce anti-Christian bias. • Treat hate crime victims in a sensitive and respectful manner to prevent secondary victimization.

LAW ENFORCEMENT

Institutional level	<ul style="list-style-type: none"> • Assess and review whether policies, mechanisms and systems are in place to effectively collect data on anti-Christian hate crimes and address the related security needs of Christian communities. • Develop and implement training and capacity-building programmes for law enforcement officials on the recording of anti-Christian hate crimes. • Analyse the collected hate crime data to evaluate policy responses and identify periods of elevated risk. • Inform Christian communities whenever a specific threat is identified. • Establish coordination mechanisms with Christian communities to build trust, for instance, through consultation platforms or the appointment of liaison officers. • Cooperate with Christian communities and civil society organizations to collect data on anti-Christian hate crimes and address under-reporting. • Coordinate emergency communication procedures with Christian communities and provide increased security and safety measures at periods of elevated risk. • Provide technical advice and training to support Christian communities to strengthen their hate crime data collection and security measures, including risk assessments, emergency protocols, security plans and crisis management systems.
Individual level	<ul style="list-style-type: none"> • Assess whether a criminal offence you are recording and investigating might have been motivated by bias. Ask the victim and any witnesses for their perception of any anti-Christian bias in an incident or crime. • Make appointments with your local Christian communities to establish contacts, learn about the communities and identify their security concerns. • Keep hate crime victims informed about the progress of their cases. • Ensure that your language and behaviour conform to a rights-based standard for all communities and do not perpetuate or reinforce anti-Christian bias. • Treat hate crime victims in a sensitive and respectful manner to prevent secondary victimization.

VICTIM SUPPORT SERVICE PROVIDERS (PUBLIC SECTOR, INCLUDING LAW ENFORCEMENT, AND CIVIL SOCIETY)

Institutional level	<ul style="list-style-type: none"> • Develop coherent and effective victim support systems with adequate funding and service quality standards, ensuring the cooperation of all relevant actors. • Put in place effective Individual Needs Assessment (INA) and referral systems. • Ensure that victims of anti-Christian hate crimes have access to specialist service providers and increase the availability of specialist hate crime victim support over time. • Develop and implement training programmes for service providers on the sensitive and respectful treatment of hate crime victims and on the specific characteristics and needs of Christian communities.
Individual level	<ul style="list-style-type: none"> • Participate actively in training opportunities on the sensitive and respectful treatment of hate crime victims and on the specific characteristics and needs of Christian communities. • Provide personalized support based on an individual needs assessment of the needs of each victim. • Follow up with hate crime victims to ensure that the required support has been provided. • Keep hate crime victims informed about the progress of their cases. • Reach out to the media to promote sensitive reporting on anti-Christian hate crimes. • Ensure that your language and behaviour conform to a rights-based standard for all communities and do not perpetuate or reinforce anti-Christian bias. • Treat hate crime victims in a sensitive and respectful manner to prevent secondary victimization.

EDUCATION SECTOR (INCLUDING POLICYMAKERS)

Institutional level	<ul style="list-style-type: none">• Develop public and private education policies and strategies to address the root causes of intolerance and discrimination.• Collaborate with civil society to develop educational initiatives to strengthen social media literacy.• Develop policies and reporting mechanisms for anti-Christian hate incidents in educational institutions.• Establish educational initiatives to promote tolerance in institutions open to the public, such as museums, libraries and cultural heritage centres.
Individual level	<ul style="list-style-type: none">• Ensure your curriculum and teaching materials are inclusive, non-biased and based on respect for human dignity.• Promote religious literacy by imparting unbiased and accurate information on different religions and beliefs.• Discuss the harms of online harassment and abuse.• Monitor whether the Christian students in your school experience any harassment, threats or violence on the way to and from school, as well as in school.• Ensure that your language and behaviour conform to a rights-based standard for all communities and do not perpetuate or reinforce anti-Christian bias.• Treat hate crime victims in a sensitive and respectful manner to prevent secondary victimization.

RELIGIOUS OR BELIEF COMMUNITIES AND THEIR LEADERS

Institutional level	<ul style="list-style-type: none"> • Monitor anti-Christian hate incidents and encourage the members of your community to report incidents and crimes. • Proactively and systematically engage in coordination mechanisms established by the government to discuss concerns related to anti-Christian hate crimes and to share data. • Share reports of hate incidents with the media and relevant international networks and organizations. • Organize workshops and visits to introduce police officers to the community. • Advocate for your government to follow up on and implement its OSCE commitments and international obligations on intolerance against Christians. • Make use of the support provided by law enforcement in efforts to develop security measures, including risk assessments, emergency protocols, security plans and crisis management systems, as well as to promote hate crime reporting within the community. • Implement awareness-raising campaigns about the need to counter anti-Christian hate crimes, in coordination with the media, civil society organizations and government. • Organize and engage in interfaith and interreligious dialogue and partnerships. • Form broad-based, inclusive coalitions with other religious or belief communities and civil society organizations to address hatred based on religion or belief and broader tolerance and non-discrimination issues. • Promptly and unequivocally condemn anti-Christian hate crimes and publicly express solidarity with the affected Christian communities.
Individual level	<ul style="list-style-type: none"> • Participate actively in interfaith and interreligious dialogue and initiatives. • Participate in training initiatives to strengthen your capacity to collect hate crime data and respond to security threats. • Ensure that your language and behaviour conform to a rights-based standard for all communities and do not perpetuate or reinforce anti-Christian bias. • Treat hate crime victims in a sensitive and respectful manner to prevent secondary victimization.

CIVIL SOCIETY (INCLUDING CHRISTIAN AND OTHER-FAITH BASED ORGANIZATIONS AS WELL AS GROUPS WORKING ON HUMAN RIGHTS, EQUALITY, TOLERANCE AND NON-DISCRIMINATION ISSUES)

Institutional level	<ul style="list-style-type: none"> • Monitor anti-Christian hate incidents and share reports with the government, media and international networks and organizations. • Collaborate with the government to develop educational initiatives to strengthen social media literacy. • Engage proactively and systematically in coordination mechanisms established by the government to discuss concerns related to anti-Christian hate crimes and to share data. • Promote, support and facilitate interfaith and interreligious dialogue and partnerships. • Form broad-based, inclusive coalitions with other civil society organizations and religious or belief communities to address hatred based on religion or belief and broader tolerance and non-discrimination issues. • Advocate for your government to follow up on and implement its OSCE commitments and international obligations on intolerance against Christians. • Implement awareness-raising campaigns about the need to counter anti-Christian hate crimes, in coordination with the media, religious or belief communities and government. • Organize training on addressing intolerance against Christians within your own organization, in coordination with Christian communities. • Promptly and unequivocally condemn anti-Christian hate crimes and publicly express solidarity with the affected Christian communities.
Individual level	<ul style="list-style-type: none"> • Participate actively in training initiatives on addressing intolerance against Christians and hate crime data collection. • Ensure that your language and behaviour conform to a rights-based standard for all communities and do not perpetuate or reinforce anti-Christian bias. • Treat hate crime victims in a sensitive and respectful manner to prevent secondary victimization.

MEDIA, INCLUDING SOCIAL MEDIA

Institutional level	<ul style="list-style-type: none"> • Implement awareness-raising campaigns about the need to counter anti-Christian hate crimes, in coordination with religious or belief communities, civil society organizations and government. • Coordinate with religious or belief communities and civil society organizations to receive reports and concerns about intolerance against Christians. • Coordinate with religious or belief communities and civil society organizations to receive reports and concerns about intolerance against Christians. • Give visibility to public statements and activities to condemn anti-Christian hate incidents and crimes. • Develop voluntary guidelines, standards or codes of ethics for unbiased and accurate reporting on matters pertaining to religion and belief, including the portrayal of Christianity and Christian communities, and implement training on them for journalists. • Adopt measures to address the proliferation of online intolerance and discrimination, which can lead to acts of violence and hate crimes against religious or belief communities, including Christian communities.
Individual level	<ul style="list-style-type: none"> • Convey unbiased and accurate information and representations of different religions and beliefs, and ensure that reporting is based on reliable sources and informed by different points of view. • Participate actively in training and capacity-building opportunities on guidelines, standards or codes of ethics for unbiased and accurate reporting on matters pertaining to religion and belief, including Christianity and Christian communities. • Fact-check social media posts and include links to reputable news sources. • Ensure that your language and behaviour conform to a rights-based standard for all communities and do not perpetuate or reinforce anti-Christian bias. • Treat hate crime victims in a sensitive and respectful manner to prevent secondary victimization.

ANNEXES

ANNEXE 1:

Case Studies

The following hypothetical case studies have been developed as a learning resource for identifying and working with bias indicators.²²⁴ While inspired by real anti-Christian incidents reported to ODIHR, it is important to recognize that the nature of anti-Christian hate crimes and the experiences of victimization vary significantly across the OSCE region. Therefore, this non-exhaustive set of case studies can be adapted to reflect the specific national context for use in training.

The following questions should be asked when discussing the case studies with law enforcement officials or other stakeholders:

- What would you ask if you were to investigate this incident?
- What enquiries would you make?
- Which bias indicators can be identified in this incident?

²²⁴ For more information on bias indicators in anti-Christian hate crimes, see Part One — Anti-Christian hate crimes in the OSCE region: key features.

CASE STUDY 1: MURDER

A man seeking asylum, who had converted from Islam to Christianity, was stabbed by a Muslim man in the asylum centre where they both resided due to the victim's perceived religious apostasy. The perpetrator had threatened the victim on numerous previous occasions, stating, "I will send your corpse back to your country." One night while the victim was sleeping, the perpetrator entered his room armed with a knife and shouted "Allahu Akbar" — God is great — before stabbing him several times including in the chest. In the police interview after the attack, the perpetrator stated that he considered the victim an apostate and, as such, "someone who deserved to die".

Key bias indicators

Ethnic, religious or cultural differences between the perpetrator and victim

- The victim was a convert from Islam to Christianity, and apostasy can be a strong motive for hate crimes in certain contexts.

Comments, written statements, gestures or graffiti

- The statement, "I will send your corpse back to your country," indicates hostility related to both religious conversion and immigration status, which is a key indicator that the attack was motivated by a combination of biases based on religion or belief and racism and xenophobia.
- While the phrase "Allahu Akbar" itself is not inherently indicative of hate, in this context, it coincides with a violent attack, suggesting its use is part of the ideological justification of the attack.

Patterns or frequency of previous crimes or incidents

- The repeated nature of threats by the perpetrator highlights premeditation and motive. Such threats should be documented in the case file.

CASE STUDY 2: PHYSICAL ASSAULT

A male Jehovah's Witness and two female Jehovah's Witnesses were engaging in religious activities on the streets, distributing religious literature and engaging in conversation with passers-by. The group spoke to a man who became agitated and shouted, "Take your cult somewhere else!" Moments later, the man returned with three others, who began throwing bottles, cans and rocks at the group. One of the perpetrators struck the male victim with a steel baton, breaking his arm. One of the female victims was hit on the head, causing a concussion. The perpetrators used religion-based insults during the attack and damaged the religious literature.

Key bias indicators

Comments, written statements, gestures or graffiti

- The statement, "Take your cult somewhere else!" indicates hostility towards the religious beliefs and practices of Jehovah's Witnesses. Hate-motivated language is a clear bias indicator.
- The destruction of religious literature adds an element of symbolic hate. Destroying materials tied to religious beliefs is often a way to express hostility towards a religious or belief community.

Location and timing

- The victims were targeted while engaging in religious activities. The attack aimed to stop or interrupt their religious practice, a key indicator of a hate crime.

Nature of the violence

- The perpetrators returned with reinforcements and weapons, suggesting premeditation and an intent to send a stronger message of intimidation and suppression of religious expression.

CASE STUDY 3: MESSAGES AND GRAFFITI

A small Christian community centre, known for its inclusive stance towards LGBTI individuals, was targeted by vandals the day after the centre posted information about an event on its social media account for LGBTI Christians. The centre's exterior walls were vandalized with large graffiti messages stating "God Hates Fakes" and "No Place for Sinners," accompanied by anti-LGBTI slurs like "degenerates" and symbols associated with far-right extremism including swastikas.

Key bias indicators

Comments, written statements, gestures or graffiti

- The graffiti included phrases like "God Hates Fakes" and "No Place for Sinners", which are often associated with religiously-driven 'hate speech' targeting LGBTI individuals to imply that they are not 'real' Christians.
- The swastikas could reference the killing of LGBTI community members in the Nazi extermination camps during World War II.

Organized hate groups

- The presence of swastikas and far-right symbols suggests the attack may have been ideologically driven. Far-right extremist groups often target both religious or belief communities and LGBTI individuals.

Location and timing

- The attack was aimed at a Christian community centre, indicating that the perpetrators targeted the institution for its religious affiliation.
- The attack occurred after the centre posted about an event for LGBTI Christians, suggesting that the centre's inclusive stance towards LGBTI individuals was a trigger for the attack.

CASE STUDY 4: THREATS

A Jehovah's Witness woman was threatened with physical violence by her husband for conducting bible study with their children. The victim's Bible was confiscated by her husband who had previously tried to force her to convert to Islam. The victim was reluctant to report the incident to the authorities, fearing stigma and further family retaliation.

Key bias indicators

Location and timing

- The incident occurred after the perpetrator discovered the victim was practising Bible study with her children.

Patterns or frequency of previous crimes or incidents

- The repeated attempts at religious coercion to convert the victim to Islam is a bias indicator, as is the use of force or intimidation to achieve that goal.

Nature of the violence

- The context of domestic violence is significant, particularly due to the religious control being used in the context of gender-based violence. The confiscation of the Bible is a type of religious control that attempts to stop the victim from practising her religion.

CASE STUDY 5: DAMAGE TO PROPERTY

The priest of an Orthodox church arrived on a Sunday morning to find that extensive damage had been done to the church and adjoining cemetery. Three large stained-glass windows featuring important religious icons had been shattered with rocks, and a large cross on the altar had been torn down and damaged. The main entrance door to the church had large scratches in the wood and the lock was smashed. A bottle containing a flammable liquid was also found near the entrance. In the cemetery, eight headstones were toppled or smashed, and others had the names of the dead scratched out. Statues of religious symbols in the cemetery were also damaged during the attack.

Key bias indicators

Comments, written statements, gestures or graffiti

- The deliberate destruction of stained-glass windows featuring religious icons, the cross on the altar and statues of religious symbols are direct attacks on the religious identity of the community.

Location and timing

- The attack was focused on an Orthodox church, a place of worship, and its adjoining cemetery. Religious sites are often targeted to send a message of hate to the broader community.
- The attack occurred at night or early morning, before Sunday worship, a time when the church was unoccupied. Targeting places of worship 'out-of-hours' often reflects planning and intent.

Nature of the violence

- The presence of a bottle with flammable liquid suggests a possible, premeditated plan for arson, a common tactic used in targeting places of worship.

Key learnings:

- **Identify Bias Indicators:** Recognize bias motives and signs of hate crime.
- **Investigative Skills:** Ask the right questions and collect the right evidence.
- **Legal Frameworks:** Apply national and OSCE definitions of hate crime.
- **Victim-Centred Approach:** Support the victim, use trauma-informed practices, and reassure the affected community.
- **Risk Assessment:** Detect early signs of hate-based escalation and intervene.
- **Cultural Sensitivity and Religious Literacy:** Approach religious and cultural differences with respect and understanding.

ANNEXE 2:

Christianity: A Brief Introduction for Law Enforcement

This annexe is a resource that law enforcement officials and other stakeholders can use to better understand the main Christian denominations, teachings, practices and traditions. It is based on the Safer and Stronger Communities in Europe (SASCE) publication *A Practical Guide to Law Enforcement for Safer and Stronger Communities in Europe*,²²⁵ as well as information provided by experts, academics and members of Christian communities during the consultation phase of preparing this Guide.

It should be noted that the practices highlighted in this section are described in a generic way, and cannot possibly do justice to the diversity of customs and traditions that exist within Christian communities across the OSCE region. Law enforcement officials and other stakeholders are, therefore, encouraged to engage and work closely with the various local Christian communities in order to gain a deeper understanding of their history, background, teachings, distinct practices and traditions. This will, in turn, improve the quality of the relationship with the communities in question and enhance the response to anti-Christian hate crimes and security threats.

WHAT IS CHRISTIANITY?

Christianity is an Abrahamic monotheistic religion that is approximately 2,000 years old. The word ‘Christian’ designates the followers of Christ. Thus, Christianity is based on the teachings, life and person of Jesus Christ (Jesus of Nazareth),²²⁶ recognized by Christians as the Messiah, Son of God and Saviour of the world.²²⁷ Most Christians believe in the triune God (Trinity): Father, Son and Holy Spirit. The most important symbol of Christianity is the Cross and the normative text for all Christians is the Bible (Holy Scripture).

More than a third of the world’s population is Christian (approximately 2.4 billion people). A brief description of the main Christian denominations is provided in the following, non-exhaustive list:

225 *A Practical Guide to Law Enforcement for Safer and Stronger Communities in Europe*, Safer and Stronger Communities in Europe (SASCE), pp. 22–39. SASCE is a project funded by the European Commission that seeks to increase security in and around places of worship, as well as within and between Christian, Buddhist, Muslim and Jewish communities.

226 Born in Bethlehem, in Roman-controlled Judea, circa 6 to 4 BC and died in Jerusalem, Judaea, Roman Empire, AD 30 or 33.

227 This title refers to the status of Jesus as the divine son of God the Father.

- **The Eastern Orthodox Church.** The Orthodox Church is a communion of self-governing, decentralized sister Churches organized in patriarchies and united by the same faith, sacramental life, structure and canonical discipline. Its theology is based on the Bible and ancient tradition, which incorporates dogmatic decrees and teachings such as divine liturgy, sacraments, icons, fasting, Saint veneration and the liturgical calendar.
- **The Roman Catholic Church.** The Roman Catholic Church is the largest Church in the world; the teachings of the tradition and the Bible are the most important sources, and it has a centralized, hierarchical clergy structure. The head of the Church is the Pope, who is the Bishop of Rome and Sovereign of the Vatican State. Roman Catholicism grants high importance to tradition, ritual and the authority of the Pope, as well as mass, sacraments, confession, purgatory of indulgences and the veneration of Mary, the Saints and the Rosary.
- **Protestantism.** Protestantism is a broad movement with various branches and diverse structures, which emphasizes the Bible as the sole source of authority, faith and the teachings of salvation. Around the world, Protestants belong to a diversity of denominations, including Lutheranism, Calvinism, Anabaptism, Baptism, Methodism, Evangelicalism and Pentecostalism. This translates into different theological currents and, in general, includes fewer religious rituals than the Orthodox or Catholic traditions. Since the mid-twentieth century, women have been accepted among the clergy in most Protestant denominations.
- **Anglicanism.** Anglicanism is developed from the practices, liturgy and identity of the Church of England and the global Anglican Communion. Its adherents are also called Episcopalians in some countries, and base their faith on the Bible, the Thirty-nine Articles of Religion²²⁸ and the Books of Homilies.²²⁹ Some key features include an Episcopal hierarchy with regional autonomy and apostolic tradition and succession.²³⁰
- **Jehovah's Witnesses.** Jehovah's Witnesses are a centralized, non-trinitarian, restorationist²³¹ Christian movement founded from the Bible Student movement. The Bible and the New World Translation of the Holy Scriptures (NWT) are the two most important religious documents. A key characteristic is their evangelism, or literature distribution. Jehovah's Witnesses follow scriptural doctrines, reject the immortality of the soul and hellfire, and are conscientious objectors to military service, saluting state symbols and blood transfusions. They do not observe certain common Christian holidays such as Christmas and Easter.

²²⁸ The [Thirty-nine Articles of Religion](#) are statements of religious doctrines and practices in Anglicanism.

²²⁹ The [Books of Homilies](#) are two books that contain sermons on Anglicanism's religious, reformed doctrines.

²³⁰ Apostolic succession refers to the ecclesiastical transmission of authority from the apostles to religious leaders.

²³¹ Restorationism refers to a movement within Christianity that has the aim of reinstating religious beliefs, practices and structures as described in the New Testament.

- **Mormonism.** Mormons are the followers of the religious beliefs and traditions of the Church of Jesus Christ of Latter-Day Saints. They have a theocratic hierarchy with a Presidential leadership, believe in the Christian view of God and Jesus but reject trinitarianism. The Bible and the Book of Mormon are the two most important sources for Mormonism, and its main doctrines include baptism, progression, sacred ordinances (baptism for the dead and eternal marriage), tithing²³² and charity, social service and humanitarian aid, the Word of Wisdom,²³³ fasting and Sabbath²³⁴ observance.
- **Seventh-day Adventist Church.** The Seventh-day Adventist Church is a denomination of Adventist Protestantism with a hierarchical, representative structure, which corresponds to doctrines such as the Trinity, the Bible as the primary holy book, investigative judgment and the observance of Saturday as the Sabbath. The Church emphasizes a health-conscious lifestyle and adheres to Jewish dietary laws.

Recommendations

- Talk to the community and take into account their perception of bias indicators in the case of an attack, vandalism or similar.
- Considering that each Christian denomination is part of a wider structure of religious communities and institutions, a threat against one might not be an isolated incident. To ensure a comprehensive response in case of an attack, it is advisable to consult with the community representatives for informed insights and assessments.

PLACES OF WORSHIP

Depending on the denomination, the Christian place of worship can be called ‘church’, ‘cathedral’, ‘basilica’, ‘chapel’, ‘temple’, ‘house of the Lord’ or ‘Kingdom Hall’. In general, the structure of a traditional church includes the meeting space; the main congregational space (nave, naos); the sanctuary (altar, presbytery) where sacraments are celebrated; side apses where secondary altars can be found, or spaces arranged for the religious choir. There can also be balconies (organ, choir), a pulpit or ambo (a suspended structure designed for preaching), a crypt (underground space below the presbytery with different functions) and an ambulatory (an aisle that goes around the altar). For some Protestant

232 Tithing is a one-tenth percentage of someone’s annual earnings, paid as a contribution to a religious organization or place of worship.

233 The word of wisdom refers to a set of health guidelines in Mormonism, included in their scriptures. It outlines dietary and lifestyle principles, such as what to avoid, what to use in moderation and what to embrace.

234 Sabbath, according to Mormonism, is observed every Sunday, as a day for rest, acts of service and worship.

traditions, the structure of the church building can be less strictly defined, but almost always includes a worship hall with a pulpit area.

Sacred spaces

After consecration, for some Christian traditions the place of worship becomes a sacred place. For instance, access to the Church of Jesus Christ of Latter-Day Saints can be restricted for non-Mormons. In some Christian traditions cemeteries are also consecrated and thus sacred places.

The sanctuary (altar) is the holiest area in a Christian place of worship, and certain Christian denominations allow only the priest to have access. The altar can often be easily identified, as it is usually elevated and/or separated by a low barrier (altar rail), a rood screen (jubé), an iconostasis (templon) or a wall of icons. At the centre of the altar is a table ('the altar table', 'Communion table' or 'Lord's table', depending on the denomination).

There can also be sacred spaces outside Christian places of worship, including but not limited to pilgrimage sites and altars or shrines kept in the home or in public spaces.

Sacred objects

Christian places of worship often house sacred objects such as crucifixes, icons, statues, chalices, relics, maquettes, prayer books and retables, among others. These can be made of a variety of materials, including precious metals, stone or wood, and be decorated with gemstones and/or have historical value.

Sacred objects can be placed anywhere in the place of worship, but are often at the centre of the most sacred spaces. In the Catholic and Orthodox traditions, the altar table often holds the 'church tabernacle' — a locked box in which the consecrated Eucharist²³⁵ or hosts²³⁶ are stored. The tabernacle is normally made of precious metals, stone or wood. In the Orthodox and Catholic Churches, the altar also holds the Gospel (wrapped in elaborately decorated covers made of gold and silver) along with a piece of cloth (antimension) into which small pieces of holy relics are inserted.

235 The Eucharist is one of the central rites in some Christian denominations, particularly Eastern Orthodoxy, Roman Catholicism and some Protestant traditions, which involves the consumption of consecrated bread (or host) and wine as the body and blood of Jesus Christ.

236 The host is the consecrated bread used during the Eucharist.

Recommendations

- Unless it is an emergency situation, ask for permission before entering a place of worship or touching sacred objects.
- Treat all objects in the sacred spaces of a Christian place of worship with utmost respect.
- In the case of an incident that affects a Christian place of worship, talk to the community to evaluate the impact on sacred spaces and objects as possible bias indicators.

MAIN RELIGIOUS EVENTS, HOLIDAYS AND FESTIVITIES

Christian holidays and festivities

The Christian calendar includes a variety of special dates that are common to most Christian denominations. The following, non-exhaustive list highlights some of the major Christian holidays and festivals:

- **Sunday.** The first day of the week for Christians, Sunday is the day of the resurrection of Jesus Christ. For most Christian denominations Sunday is a day of rest dedicated to the religious service ('Mass/Eucharist', 'Divine Liturgy', 'Worship service').
- **Christmas.** Christmas is the celebration of Jesus' birth. Preparation for Christmas is marked through the period of Advent by Catholics, Anglicans and Protestants (the four weeks preceding Christmas) and through a 40-day Lent period by Orthodox Christians. Christmas is celebrated on different dates: in the Western tradition on 25 December and in the Eastern tradition on 6/7 January.
- **Easter.** Easter is a multi-day celebration of the resurrection of Jesus Christ. The main celebration is on Easter Sunday — the third day after Jesus Christ's death (Good Friday). The date varies from year to year: it is the first Sunday after the first full moon following the beginning of spring (21 March). Dates may vary according to the use of the Gregorian and the Julian calendars.
- **Ascension.** Forty days after Easter (always on a Thursday), Christians celebrate the Ascension of the resurrected Jesus Christ.
- **Pentecost or Whit Sunday (Whitsun).** Fifty days after Easter (always on a Sunday), Christians celebrate the Descent of the Holy Spirit upon the disciples of Jesus Christ.

- **Assumption or Dormition.** This is the main Catholic and Orthodox feast dedicated to the Virgin Mary, Jesus' mother, in August. For Catholics, it marks the bodily ascension of the Virgin Mary into heaven, while, for the Orthodox, the feast marks her Dormition or 'the Falling Asleep of the Mother of God'.

Recommendations

- Many people who do not regularly attend services throughout the year will do so for the main Christian festivities. The places of worship may be full and the nearby streets can be very busy.
- Each Christian event and denomination may have specific policing requirements. It is important to discuss with the community to become acquainted with different local customs and celebration practices.
- Some celebrations start at midnight rather than during the daytime, which may require additional consideration for scheduling and planning of resources.
- Discretion should be used if taking photos and videos or using tape recorders in places of worship during religious events. Etiquette varies depending on the Christian denomination.

Christian events in public spaces

In addition to religious services and celebrations that take place in Christian places of worship, there are also different types of Christian events that are organized in public spaces:

- **Processions.** A procession is a formal religious event whereby an organized body of people walks in a ceremonial manner in a public place. These can include ordinary and extraordinary processions, held on certain religious festivals according to the customs of the local Christian places of worship, as well as on special occasions. Some of the most common processions include Holy Week processions during Easter, Major Rogation (40 days after Easter) and Candlemas.²³⁷
- **Preaching work, canvassing or door-to-door evangelism.** Preaching work, door-to-door evangelism, or canvassing is a practice in certain Christian denominations, such as Jehovah's Witnesses and Protestantism, whereby Christian people will go from household to household or engage in public outreach to share religious knowledge, often in the form of publications.

²³⁷ Candlemas is a Christian festival celebrated on 2 February to commemorate the Virgin Mary's purification in the Temple of Jerusalem, 40 days after the birth of Jesus Christ.

- **Pilgrimage.** Pilgrimages are journeys, often involving large numbers of people, with spiritual or religious significance to a holy place, such as sites relevant to the New Testament and those associated with later events in some Christian denominations. Monasteries and other buildings or infrastructure of religious significance often constitute popular destinations for pilgrimages and other religious celebrations.

Recommendations

- To ensure effective policing of Christian events in the public sphere, it is essential that law enforcement officials meet with Christian communities to understand the scope of the event, discuss their needs, assess security risks and allocate resources that ensure rapid responses.
- During processions, the scheduled route as well as nearby streets will often have a continuous flow of people, which will require special considerations.
- Pilgrimages, particularly in rural areas, can increase crowd and traffic control threats.
- Opportunity crimes such as pickpocketing, vandalism and burglaries may increase during Christian events in the public sphere. It is recommended that emergency and patrol services be increased during these dates.

SOCIAL ETIQUETTE

Dietary restrictions

Christian dietary restrictions vary depending on the denomination and tradition, although some of the most common practices include fasting and abstinence. Fasting refers to the reduction —either fully or partially— of food intake, while abstinence is the prohibition of consuming specific products, such as meat, pork, fish, dairy, sweets, coffee or tea, alcohol and others. Some Christian denominations refrain from eating meat on Fridays or for certain religious events, such as Ash Wednesday.

Lent is a period of fasting, abstinence and almsgiving during the forty days between Ash Wednesday and Easter. This is particularly relevant in the context of Roman Catholicism and Eastern Orthodoxy; to a lesser extent for Protestantism and Anglicanism.

Recommendation

- It is recommended to be informed and respectful of Christian denominations' dietary restrictions, particularly if there is an anti-Christian hate crime victim under police care.

Physical contact and body searches

Although the level of physical contact may vary according to the culture, denomination and level of conservatism, the idea of respecting personal boundaries is central to interactions. Some Christians will also choose not to shake hands or establish any physical contact with people of the opposite sex, unless they are their parents, siblings or spouses.

Recommendations

- To ensure respect for personal boundaries, follow the greeting method used by the individual from the Christian community.
- Interviews and body searches required in the context of an investigation of anti-Christian hate crimes should be conducted by officers of the same sex. If this is not possible, it is recommended that this is acknowledged and explained prior. The person searched should be offered to be accompanied by a member of their community during the body search.

Religious leaders

Christian religious leaders, or the clergy,²³⁸ guide members of the communities in their religious practices, such as worship, teaching, guidance or performing rituals. Their clerical garments are often distinctive, such as those worn by priests or nuns. Some Christian communities tend to be hierarchically ruled by a council (synod) and presided over by senior or high-ranking leaders such as a primate bishop, an archbishop or a metropolitan.

²³⁸ A group of religious leaders, whose specific title will vary according to the Christian denomination.

Recommendations

- Law enforcement should engage and co-ordinate with religious leaders and representatives of Christian communities, respecting their freedom to manage their internal affairs.
- It is recommended to get acquainted with the local communities' clergy structure and any relevant specificities, such as rituals and religious attire.²³⁹
- In the case of a potential anti-Christian hate crime, particularly where the victim was easily identifiable, law enforcement officials should refer to the section on *Ethnic, religious or cultural differences between the perpetrator and victim* for additional information on anti-Christian bias motivations.

Entering places of worship

For most Christian denominations it is customary for men to remove their hat when entering a Christian place of worship, while shoes should be kept on.

It is recommended to use modest and respectful attire when entering a place of worship or interacting with a Christian community. Some places of worship may have stricter dress codes, such as the use of head coverings, although it is not expected for non-Christian women to wear them in most denominations.

Recommendation

- Take the time to find out about and be respectful of the standards of the local community or communities you engage with.

²³⁹ For instance, nuns, especially in Roman Catholicism and Eastern Orthodoxy, will tend to wear a wedding ring as a symbol of their spiritual marriage to Jesus Christ.