



**Comments submitted by Serbia
on GREVIO's first thematic evaluation report:**

**Building trust by delivering
support, protection and justice**

Received by GREVIO on 15th September 2025

GREVIO/Inf(2025)11

Published on 25th September 2025

**Comments submitted by the Ministry without Portfolio in charge of Gender Equality,
Prevention of Violence, and the Economic and Political Empowerment of Women, on behalf of
the Government of the Republic of Serbia**

Following GREVIO's first thematic evaluation report on the implementation of the Council of Europe Convention on Action against Violence against Women and Domestic Violence (Istanbul Convention) in Serbia, please find below the final comments of Serbian authorities:

Regarding chapter I. Emerging trends in the areas of violence against women and domestic violence, para.2. particularly related to the Decision of the Constitutional Court regarding the Law on Gender Equality - The Constitutional Court adopted an interim measure on the basis of this law until the adoption of the final Decision of the Constitutional Court on the assessment of the constitutionality of the Law on Gender Equality. The Constitutional Court has no specific deadline within which it must rule on the constitutionality of the mentioned law.

Regarding para.15. Persistent and structural barriers to support and justice for Roma women - The Ministry of Human and Minority Rights and Social Dialogue cooperates with the Roma Women's Network of Serbia, which was established in 2004 and brings together 30 Roma women's organizations and initiatives from across the country. These organizations, in cooperation with the competent authorities, act in the interest of Roma women in the fields of human rights, improvement of health, education, employment, housing, combating violence against women, combating trafficking in women, prevention of early and arranged marriages, as well as improving the political participation of Roma women.

For example, at the initiative of the Roma Women's Network of Serbia, on April 5, 2024, the Ministry of Human and Minority Rights and Social Dialogue organized a social dialogue entitled 'Stolen Childhood – Child, Early and Forced Marriages'. We have also supported every conference organized by the Network. This cooperation demonstrates that Roma women's organizations have confidence in the institutions of the Government of the Republic of Serbia, including the Coordination Body for the Social Inclusion of Roma Men and Women.

Regarding Chapter II. Changes in definitions, comprehensive and coordinated policies, funding and data collection in the areas of violence against women and domestic violence, para 25. particularly related to the Decision of the Constitutional Court regarding the Law on Gender Equality – same as in the comments regarding para.2, we have to wait for the decision on the Constitutional court.

Regarding para. 27 and 29. on the National Strategy on Gender Equality -Following the evaluation of the first National Strategy for Gender Equality for the period 2016–2020 ('Official Gazette of RS', No. 4/2016), carried out by the association SeCons with the support of the Coordination Body for Gender Equality of the Government of the Republic of Serbia and UN Women, and upon the proposal of the newly established Ministry of Human and Minority Rights and Social Dialogue, the Government of the Republic of Serbia, at its session held on 14 October 2021, adopted the Gender Equality Strategy for the period 2021–2030 ('Official Gazette of RS', No. 103/2021), as well as two action plans for its implementation. Furthermore, with the support of the OSCE Mission to Serbia, the Ministry of Human and Minority Rights and Social Dialogue carried out in 2024 an assessment (evaluation) of the implementation of the said Strategy, whose amendment and supplementation is planned for 2025, in accordance with the Law on the Planning System of the Republic of Serbia ('Official Gazette of RS', No. 30/2018)."

Regarding para.31. on the Coordination Body for the Gender Equality- The Coordination Body has been formed in June 2025 and the Office of the Minister without Portfolio responsible for gender equality, the prevention of violence against women, and the economic and political empowerment of women took its role until then.

Regarding para.35. on the financial resources – the state responsible bodies are: ministry responsible for gender equality, the ministry responsible for monitoring the implementation of the Law on the Prevention of Domestic Violence, the ministry responsible for drafting and monitoring the Strategy for Preventing and Combating Gender-Based Violence against Women and Domestic Violence, the Cabinet of the Minister without Portfolio in charge of activities in the field of gender equality, prevention of violence against women, and the economic and political empowerment of women, the Government's Coordination Body for Gender Equality, as well as in the competent authorities at the provincial and local levels.”

Regarding para 52. Health sector - the applicable Rulebook on Forms and the Content of Forms for Maintaining Health Records, Registers, Reports, and the Electronic Medical File (“Official Gazette of RS”, Nos. 109/2016 and 20/2019), which prescribes the content of forms for maintaining health documentation, stipulates that the Report of Suspected Abuse of Women, as mandatory data, also contains information on the relationship of the perpetrator to the victim, if the perpetrator is known:

Regarding Chapter III. Analysis on the implementation of selected provisions in priority areas in the fields of prevention, protection and prosecution, para 68. Analysis on the implementation of selected provisions in priority areas in the fields of prevention, protection and prosecution, para.68. Biological textbook - The Ministry of Education once again emphasizes that the corrected Biology textbooks still contain content covering the concepts of gender, sex, gender and sexual identity, the development of tolerance, and the prohibition of discrimination, which is precisely the purpose of this lesson. The expert Working Group analysed the content – solely and exclusively – from the perspective of its appropriateness to the age of the students, their developmental level, and prior knowledge, while the biological expertise and the relevance of the professional aspect of the content were not the subject of this analysis nor were they questioned.

After reviewing the mentioned lessons, the Working Group issued the opinion that corrections were needed in seven approved textbooks, so that the way the content is presented would be appropriate to the students' age, prior knowledge, and developmental level. The opinions of the Working Group were written for each textbook individually, since the corrections related to different ways of presenting the content by different publishers. For example, in one of the textbooks, the Working Group noted that too much space was devoted to the influence of the environment, which could lead students to wrongly conclude that this influence is decisive; in another textbook it was indicated that inadequate examples should be omitted, where assumptions are made without evidence, or where the given example could be interpreted as offensive to supporters of non-traditional sexual orientations, and could serve as a starting point for developing prejudices towards LGBT fellow citizens among adolescents of heterosexual orientation.

Regarding para 69. –Platform Čuvam te (“I protect you”) - The Government of the Republic of Serbia created the National Platform with the aim of strengthening intersectoral cooperation among all competent institutions for the protection of children from all forms of violence. The Platform was established in 2021 and has been continuously improved since then. The National Platform “Čuvam te” was developed with the goal of preventing all forms of violence involving children, and that all competent authorities responsible for the protection of children and youth from violence (physical, psychological, domestic, sexual, trafficking in human beings, etc.) are part of the Platform. In line with the competences of all systems, educational materials are developed for prevention, and procedures are followed within their competences when a case of violence is reported. From the very beginning, the Ministry of Education has been working intensively on developing informational and educational content, both for school staff and for students and parents. By the end of June 2025, nearly 440 informational-educational texts had been published, and 22 trainings had been developed relating to raising awareness of all forms of violence, methods of intervention, and providing support. From the launch of the Platform (2021) until June 2025, 30,353 students, 26,527 parents, and 57,165 education staff members participated in these trainings.

Some of the trainings available on the Platform include:

- For education staff: “Response of staff in educational institutions to situations of discriminatory behavior” – from June 2024, when the training was posted, until June 2025, 7,926 staff members completed it.
- For students: “Prevention of sexual and digital violence against children” – during 2024 and 2025 (until June), 2,703 students attended this training.
- For students: “How to protect myself and others online” – from 2023 to March 2025, 5,641 students completed it.
- For parents: “Safe use of digital technology and the role of the family” – during 2024 and 2025 (until June), nearly 4,144 parents participated.

In addition to the above, the National Platform “Čuvam te” also includes a training specifically related to the response of staff in situations of domestic violence. This training was added in 2022, and so far 37,970 staff members have completed it.

The Ministry of Education continuously invests additional efforts in improving staff competences for the development of students’ socio-emotional skills, as well as in strengthening and sensitizing employees for the early recognition of risk factors or early signs of risky behaviors among students – which certainly include violent pornography and the sharing of intimate images, both of which can place a young person in the position of a potential victim of various forms of violence and abuse (domestic violence, human trafficking, violent extremism and radicalization, peer violence, psychoactive substance abuse, mental health difficulties, etc.). Some significant projects in this area include:

- Within the project “Together and Safe through Childhood”, implemented by the Ministry of Education in cooperation with the Ministry of Interior and other partners, during the 2023/24 school year, 13,384 interactive workshops on the topic “Prevention of peer violence in real and digital environments” were held in all primary schools in Serbia for 52,234 fifth-grade students. The workshops were conducted by 1,679 police officers and firefighters with the support of 23,453 school representatives. The project will continue in the 2025/26 school year.
- The “Skills for Adolescence” program, implemented since October 2023 in cooperation with the United Nations Office on Drugs and Crime (UNODC), aims to improve staff competences for developing students’ socio-emotional skills. During 2024 and 2025, 366 staff members who attended the training implemented project activities with their sixth- and seventh-grade students through a series of workshops covering topics directly related to socio-emotional development: The Path of Adolescence, Self-confidence and Communication Skills, Emotional Regulation, Peer Relationships, Family Relationships, Healthy Choices and Goal Setting, etc. The goal of the program was to create an accepting and supportive school environment through the development of assertive communication, responsible decision-making, self-awareness (of attitudes, values, and needs), and strengthening of self-confidence. A report on the achieved results will be prepared during July and August 2025. In addition, a video training titled “Upbringing and Socio-Emotional Learning in the Function of Children’s Wellbeing and Holistic Development” was created at the end of 2024 in cooperation with the Center for Interactive Pedagogy, and by now nearly 14,000 school employees have familiarized themselves with its content.

Given the complexity of the phenomenon of peer violence and the need for action by all competent systems, the National Platform includes, in addition to the Ministry of Education, the following institutions: The Ministry of Labour, Employment, Veterans and Social Affairs; the Ministry for Family Welfare and Demography; the Ministry of Interior; the Ministry of Health; the Ministry of Information and Telecommunications; the Ministry of Justice; and the Public Prosecutor’s Office. The Protocol on Cooperation and Provision of Cross-Sectoral Services through the software solution “Čuvam te” defines

the roles and responsibilities of each of the mentioned sectors in handling violence cases reported through the Platform.

One of the priority areas in the Catalogue of Continuous Professional Development Programs for Teachers, Educators, and Professional Associates for the 2022/2023, 2023/2024, and 2024/2025 school years (zuov-katalog.rs) relates to “Improving digital competences and the use of information and communication technologies in the implementation of the educational process.” The Catalogue contains 180 accredited programs aimed at strengthening the digital competences of education staff. It also includes six accredited trainings on the recognition of violence against women and domestic violence (two of which are implemented by the Autonomous Women’s Center in Belgrade).

In order to raise awareness of risky behavior in the digital space, including the misuse of digital tools, the Ministry of Education’s website, as well as the “Čuvam te” Platform, feature brochures for parents and other adults involved in the upbringing and education of children. These three brochures, published in June 2025, are entitled “Digital Literacy,” “Social Networks,” and “Artificial Intelligence.” They are part of the “Digital Compass for Parents” series, through which the Ministry of Education, the Ministry of Information and Telecommunications, the Center for Educational Policies, UNICEF, and the company Yettel aim to support parents in facing the challenges of digital parenting. The goal of the series is to empower parents to be an active support to their children in the constructive use of ICT and in preventing risky behavior in the digital environment.

The brochures contain clear explanations of key concepts and practical advice, highlighting not only the risks but also the potential of social networks, AI tools, and the importance of digital literacy. Their aim is to help parents bridge the digital divide and develop open and supportive communication with their children about their digital experiences. The publications are also available on the website of the Ministry of Education.

Regarding para 70. Violence in education - There are two working bodies for the prevention of violence in education and the revision of the by-law. Immediately after the tragic events of May 2023 in the Republic of Serbia, the Ministry of Education worked intensively on amending the legal and by-law framework in the area of protection against violence. Taking into account the proposals of all representatives of competent institutions, civil society organizations, and all members of the Council for the Prevention of Peer Violence, established by the Government of the Republic of Serbia on 11 May 2023, the Government established the Council for the Prevention of Peer Violence, and in November 2023, the Law on the Foundations of the Education and Upbringing System was amended and adopted.

The outcome of the work of these bodies concerned the improvement of procedures for handling situations of violence and other risky situations that may occur in the school environment (clarifying when and in which situations disciplinary proceedings against students are initiated, shortening the deadlines for their implementation—from 30 to 20 days for violations of the prohibition of violence and discrimination—with the possibility of removing the student from direct educational activities, based on the assessment of the Protection Team).

During 2024, amendments to by-laws were also adopted, regulating in more detail the steps taken by school staff in the areas of prevention and intervention. The **Rulebook on the Protocol for Action in Educational Institutions in Response to Violence, Abuse, and Neglect** (“Official Gazette of RS”, No. 11/2024) clarified dilemmas in practice, more precisely explained in which complex situations of violence and/or risky situations staff may remove a student from direct educational activities, with the inclusion of other systems in providing support to the child and family, while ensuring the child’s right to education is not jeopardized. For the first time, this Rulebook also defined procedures for the education system’s response in crisis events.

Another by-law—the **Rulebook on the Performance of Socially Useful and Humanitarian Work in Educational Institutions** (“Official Gazette of RS”, No. 10/2024)—further strengthened the role of

school staff in creating an accepting and supportive school environment, through the planning and implementation of socially useful and humanitarian work within annual school violence prevention plans and in achieving competencies for democratic culture.

In addition, with the aim of improving the child protection system from all forms of violence, the Ministry of Education, in cooperation with the Council of Europe, conducted in 2024 the national survey *“Prevention of Peer Violence in Schools.”* The survey was carried out on a representative sample of nearly 5,200 respondents (students, parents, and staff) from 77 primary and secondary schools, applying a complex methodological approach. The applied methodology (scales, questionnaires) aimed to contribute to a better understanding of the phenomenon of peer violence, its potential causes, and the link between experiencing and perpetrating violence; to identify key areas in the education system that need improvement in order to create a safe and supportive school environment; and to understand the specific dynamics of digital violence and gender-based violence, which were additionally highlighted in this research. The result of the survey is an insight into all forms of violence to which students are exposed and the identification of risk factors, with the definition of specific practical recommendations and guidelines for creating education policies to strengthen the comprehensive child protection system against violence. The results and recommendations will be published by the end of 2025.

As for the observation of the GREVIO group in the Preliminary Report that the scope of implementation of annual programs for combating discrimination and violence in institutions “remains unclear,” we emphasize that legal and by-law acts clearly define the obligation of educational institutions in the area of protection against violence. All institutions have established Protection Teams against discrimination, violence, abuse, and neglect, whose preventive and intervention roles are precisely defined in the Rulebook on the Protocol for Action in Response to Violence, Abuse, and Neglect.

The lawfulness of the actions of educational institutions and the quality of their work are monitored and reviewed by the competent organizational units of the Ministry of Education—education inspectors and education advisors from 17 school administrations. In the 2024/2025 school year, in line with prescribed legal regulations, educational institutions reported to the Ministry of Education, i.e. to the competent school administrations, a total of 612 situations of violence, risky student behaviour, and crisis events. Based on the analysis of these reports, the largest percentage of reported situations of violence related to peer-to-peer physical violence (390 reports), psychological violence was recorded in 26 reports, digital violence in 24 reports, while in the remaining reports two or more forms of violence were present. With regard to cases of domestic violence in which students were victims, the Ministry was informed of 12 cases.

In enhanced educational work plans, in addition to the class teacher and the school counsellor, the parents of the students participate, and, depending on the assessment, professionals from other systems involved in providing support to the child/student may also participate. In third-level violence situations, as well as in cases of domestic violence, other competent institutions from the external protection network are involved in supporting children and families in overcoming the entire situation (center for social work, healthcare institution, police, prosecution).

In order to further strengthen the child protection system against violence, and taking into account the competences of the education system (pre-university education), the Ministry continuously undertakes additional activities. Therefore, we will intensify our work on this issue in the coming period within the EU IPA program *“Support to Education Policy in the Republic of Serbia”* under the Sector Reform Contract of the Republic of Serbia.

Regarding para 72. Conclusion on the gender equality in education - The Ministry of Education introduced a new educational paradigm – competence-oriented education, as already mentioned. One of the general cross-curricular competencies to be developed by the end of compulsory primary and

secondary education in the Republic of Serbia is a Responsible Attitude towards Health, the development of which today appears more necessary than ever for mastering health literacy.

Work has continued on strengthening education staff in developing a responsible attitude towards health, preserving the health and safety of students, and supporting professional associates—a process that the Ministry of Education launched in 2020 in cooperation with the UNFPA (United Nations Population Fund) team and the Institute for the Improvement of Education (Zavod za unapređivanje obrazovanja i vaspitanja – ZUOV). Throughout the school year, this cross-curricular competence of Responsible Attitude towards Health is continuously developed among primary and secondary school students through the model of horizontal learning—exchange of presentations, workshop activities, and preparation of lesson plans and extracurricular activities.

Examples of good practice in developing this competence are continuously published on the ZUOV platform <https://zuov.gov.rs/zdravlje/> and represent resources available to all education staff. Among the resources found on the ZUOV website and the National Education Platform are the following materials:

- “Prevention – Reproductive Health of Youth” (Brochure: reproductive-health.pdf);
- Workshops: “Sexual and Reproductive Health”, link;
- Workshops: “Healthy Lifestyles”, link.

Within the Links for Secondary School Students section here, there are materials on youth mental health, recognition and protection from violence, while in the Teachers’ Work section there are lesson and extracurricular activity plans.

In addition, the Ministry of Education has introduced, as one of the important innovations in the Strategy for the Development of Education in the Republic of Serbia until 2030 (SROVRS 2030), a comprehensive programmatic perspective that takes into account the continuity of education through all levels and all areas. In elaborating the measures for achieving the General Goal of SROVRS 2030, the education system continuously implements a range of preventive and intervention activities in the following areas: protection from violence and discrimination, preservation of mental health, development of gender equality and other forms of equality, improvement of reproductive health, and prevention of risky behaviors among children and youth.

SROVRS 2030 also highlighted school sports as one of its strategic priorities. Therefore, in order to promote healthy lifestyles and a responsible attitude towards health, particular attention is devoted to its enhancement. The goal of teaching and learning Physical and Health Education is for students to develop physical abilities, motor skills, and knowledge in the field of physical and health culture, with the aim of preserving health and applying proper and regular physical exercise in modern living and working conditions. By learning this subject, students also develop skills and acquire knowledge about the cultural values of physical exercise.

Physical and Health Education is present in all schools in the Republic of Serbia and is implemented as a compulsory subject prescribed by the teaching and learning plan and program. Within Physical and Health Education, students also improve their competencies in the field of sexual education and raise awareness of the harmful effects of risky behaviour, such as violent pornography and the consequences of sharing intimate images.

Regarding para 75. The Centres on the social protection - normative framework for the system of accreditation and professional development was established as early as 2011 with the adoption of the Law on Social Protection, while the Rulebook on the Organization, Norms, and Standards of Work of the Centre for Social Work from 2008 established the “obligation that all newly employed professional and other workers and volunteers must complete the trainings prescribed by the ministry in charge of

social affairs or another competent authority,” as well as that professional workers of the Centre for Social Work are “obliged to undergo professional development in order to perform and improve professional work more successfully.”

The normative framework of social protection does not recognize mandatory training for employees, nor does it make a distinction between mandatory and non-mandatory programs, but it has defined mandatory professional development in the manner prescribed by law and by-laws.

The laws and by-laws regulating professional development in the social protection system are as follows:

1. Article 49 of the Labour Law (“Official Gazette of RS”, Nos. 24/2005, 61/2005, 54/2009, 32/2013, 75/2014, 13/2017 – decision of the Constitutional Court, 113/2017 and 95/2018 – authentic interpretation)
2. Articles 143–145 of the Law on Social Protection (“Official Gazette of RS”, No. 24/2011)
3. Articles 12 and 30 of the Rulebook on the Organization, Norms and Standards of Work of the Centre for Social Work (“Official Gazette of RS”, Nos. 59/2008, 37/2010, 39/2011 – other rulebook, 1/2012 – other rulebook, 51/2019 and 12/2020)
4. Rulebook on Professional Affairs in Social Protection (“Official Gazette of RS”, No. 1/2012 of 11 January 2012)
5. Article 20 of the Rulebook on Detailed Conditions and Standards for the Provision of Social Protection Services (“Official Gazette of RS”, Nos. 42/2013, 89/2018 and 73/2019)
6. Article 10 of the Rulebook on Licensing of Professional Workers in Social Protection (“Official Gazette of RS”, Nos. 42/2013 and 53/2013)
7. Article 2 of the Rulebook on Standards and Procedure for Accreditation of Training Programs for Professional Workers and Associates in Social Protection (“Official Gazette of RS”, No. 31/2014)
8. Articles 4 and 10 of the Rulebook on the Structure, Content and Method of Developing the Annual Work Program of Social Protection Institutions (“Official Gazette of RS”, No. 18/2024)

The Rulebook on Licensing of Professional Workers in Social Protection clearly defines licensing requirements in relation to the performance of certain professional activities (basic professional activities in social protection, specialized professional activities, supervisory and legal activities). In this regard, employees performing these tasks are obliged to complete appropriate accredited training programs to acquire specific knowledge and skills for the particular job (case manager, educator, foster care counselor, etc.), that is, for working with a particular user group. In addition, for specialized professional activities it is necessary to complete an accredited specialized training program, while for supervisory activities it is necessary to complete a training program for supervision in social protection.

The Law on Social Protection defines the obligation of employees to undergo professional development during their work, and Article 144 states: “Professional workers and associates in social protection have the right and duty to continuously monitor the development of science and practice during their professional work and to undergo professional development in order to maintain and improve professional competences and the quality of professional work.”

The Rulebook on the Structure, Content and Method of Developing the Annual Work Program of Social Protection Institutions, in Article 10, defines the manner of developing a professional development plan: “The professional development plan determines the planned types and forms of professional development, the fields in which professional development is planned, the structure of employees covered by professional development, the expected goals achieved through professional development,

as well as the planned financial resources and the method of financing professional development of employees.”

In the process of planning professional development in centres for social work and centres for foster care and adoption, supervisors have an important role in assessing and evaluating the competencies, knowledge, and skills of professional workers, while in social protection institutions this role is performed by coordinators and heads of professional work. The costs of professional development of professional workers and associates are borne by the employers and the professional workers themselves (Law on Social Protection, Article 143).

Regarding Para 78. School trainings - During 2022 and 2023, in cooperation with the Institute for the Improvement of Education, three training programs were developed for education staff. These programs included dedicated modules specifically aimed at empowering employees to act in situations of domestic violence. Approximately 450 staff members attended these trainings. Furthermore, a training program for school employees was developed within the National Platform “Čuvam te” (“I Protect You”), focusing on staff responses in cases of domestic violence. The training was launched on the Platform in 2022, and to date, 37,970 employees have successfully completed it.

Regarding para. 79. On the training in the social sector - We emphasize that in the social protection sector, accredited training programs on various forms of violence are available at the link Catalogue of Accredited Training Programs, and that the authors and implementers of most of the trainings related to violence are in fact civil society organizations, as can be seen in the summaries of these trainings.

Regarding para 102. On the centres of social welfare - Support and assistance services in the process of integration or reintegration into the labour market for all unemployed persons registered with the National Employment Service (who, by registering, express their consent regarding the rights and obligations arising from the Law on Employment and Unemployment Insurance), including victims of domestic violence, are available throughout the territory of the Republic of Serbia, given that the National Employment Service, in full compliance with the relevant ILO Convention, is organized on a territorial basis and consists of the Directorate, two provincial offices, 34 branches, 21 offices, and more than 120 local units in all districts of the Republic of Serbia.

Therefore, the availability of services and measures within the active employment policy system is ensured in all local self-government units, but their use depends on the interest and willingness of unemployed persons to actively seek employment.

Regarding para 104. On the financial independence of victims – The proof of status, specifically as a victim of domestic violence does not constitute stigma, but rather has a dual importance. Namely, on the one hand, the certificate of status issued by the competent Centre for Social Work informs the employment counsellor at the National Employment Service that the person is a beneficiary of social protection services, is facing multiple vulnerability factors, and that it is necessary to apply integrated service provision from different support systems, along with intensified professional counselling related to active job-seeking. On the other hand, the employer obtains the right to a subsidy for employing unemployed persons from the category of hard-to-employ individuals if they employ a person from this category, which includes victims of domestic violence. For further information, see the Action Plan for the period 2024–2026 for the Implementation of the Employment Strategy in the Republic of Serbia for the period 2021–2026: Action Plan 2024–2026 for the Implementation of the Employment Strategy.

Furthermore, data on employment cases from the National Employment Service records for 2023 and 2024 do not support the observation made in this report. For example, in the year-to-year period 2023/2024 (as of 31 December), the number of victims of domestic violence registered with the NES decreased by 154 persons, or 40%. During 2024, 65 cases of employment of victims of domestic violence on permanent contracts were recorded, while a significant number of persons were included in

the labour market on the basis of fixed-term contracts or contracts on engagement (work outside employment). Thus, the presented facts do not correspond to the observation given in the Report.

It should be particularly emphasized that a person is not obliged to disclose their status as a victim of domestic violence when registering with the NES, if they do not wish to do so.

Regarding para.114. The health care sector - The rights arising from mandatory health insurance are regulated by the Law on Health Insurance (Official Gazette of RS, Nos. 25/2019, 92/2023):

Article 2

(1) This Law regulates the rights arising from mandatory health insurance and the conditions for exercising them, the financing of mandatory health insurance, the contracting of healthcare, the organization of mandatory health insurance, and other issues of importance for the mandatory health insurance system.

In accordance with Article 52, paragraph 1, items 6 and 7 of the Law on Health Insurance, the right to healthcare also includes medicines and medical devices:

Article 52

(1) The right to healthcare referred to in Article 51 of this Law includes:

...

6) medicines;

7) medical devices.

The right to medicines includes the right to medicines from the List of Medicines prescribed by prescription or issued by order at the expense of mandatory health insurance funds (Article 66, paragraph 1):

Article 66

(1) The right to medicines includes the right to medicines from the List of Medicines prescribed by prescription or issued by order at the expense of mandatory health insurance funds (hereinafter: List of Medicines).

(2) By way of exception, insured persons are also provided with a medicine not on the List of Medicines, if medically necessary for treatment, under conditions determined by the general act referred to in Article 133 of this Law.

(3) The Republic Health Insurance Fund adopts the general act determining the List of Medicines, which also contains the essential medicines necessary for the treatment of diseases and injuries, regardless of cause, in line with the WHO Essential Medicines List and the general act referred to in paragraph 5 of this Article.

...

For the purpose of adopting, amending, or supplementing the List of Medicines, the Republic Health Insurance Fund establishes a Central Medicines Commission, composed of 11 distinguished experts in the fields of medicine, dentistry, and pharmacy, appointed by the Minister of Health, the Fund, and the community of medical faculties (Article 67, paragraphs 1–3).

Article 67

(1) In order to add, amend, or remove medicines from the List of Medicines, the Republic Fund establishes the Central Medicines Commission, by decision of the Fund's Managing Board.

(2) The Central Medicines Commission has 11 members, distinguished experts in the fields of medicine, dentistry, and pharmacy.

(3) The Minister of Health and the Director of the Fund each appoint five members, and one member is appointed by the community of medical faculties.

Medical devices provided under mandatory health insurance are regulated by Article 70 of the Law:

Article 70

(1) Insured persons are entitled to medical devices at the expense of mandatory health insurance funds.

(2) Medical devices include:

1. medical devices serving for functional and aesthetic replacement of lost body parts, support, prevention or correction of deformities, and facilitation of basic life functions (medical-technical aids);
2. medical devices implanted in the body of the insured person (implants).

(3–5) The Minister, at the proposal of the Fund, determines the type, class, category, indications, duration, renewal, and conditions for exercising the right to medical-technical aids and implants.

Law on Health Insurance

In accordance with Article 6 of the Rulebook on the List of Medicines Prescribed and Issued at the Expense of Mandatory Health Insurance Funds (Official Gazette of RS, No. 50/2025), participation fees (co-payments) are set for certain medicines:

Article 6

(1) For medicines from List A, a fixed co-payment of 50 dinars per package is paid by insured persons.

(2) For medicines from List A1, a co-payment from 10% to 90% of the retail price is paid.

(3) For ampouled medicines from List B administered in primary healthcare institutions, a fixed co-payment of 50 dinars per order is paid.

(4) For medicines from Lists A and A1 used during hospital treatment, insured persons pay no co-payment.

(5) For medicines from Lists B, C, and D, the Republic Fund covers the full cost.

Regarding para 116. On the shelter s- In cooperation between the Ministry of Labour, Employment, Veterans and Social Affairs and UN Women, an analysis was developed entitled “Specialized Shelter Service in Serbia – Needs, Capacities and Resources for Long-Term and Uninterrupted Functioning”, which is available on the website of the Ministry of Labour.

Regarding para 192. Using technology - in the implementation of the Law on the Prevention of Domestic Violence (Official Gazette of RS, Nos. 94/2016 and 10/2023 – other law), the Ministry of Interior previously considered the possibility of introducing such measures as a form of protection. However, during the analysis it was unequivocally concluded that they are not applicable, for several reasons:

1. From the perspective of the law itself – preventive urgent measures do not require the existence of reasonable suspicion of a criminal offense, while the application of electronic bracelets is directly linked to criminal proceedings. Therefore, even in situations where the elements of a criminal offense have not been committed, it is clear that this is a preventive law, which provides the police and prosecution with the possibility to react at the earliest stage of violence in order to prevent the commission of a criminal offense altogether. The efficiency of the procedure depends on the accurate

risk assessment made by police officers and prosecutors, while the electronic bracelet in itself does not reduce risk without other accompanying protection measures.

2. From the perspective of the perpetrator – a person against whom an urgent measure is imposed is clearly and unequivocally made aware that even the slightest form of violence will not be tolerated and is, in a way, “warned” that such behaviour must not be repeated. Translated into the area of criminal proceedings, this person has not been convicted, nor does a legal basis exist for criminal action; in fact, not even reasonable suspicion that a criminal offense has been committed necessarily exists, but only a potential risk.

3. From the perspective of the victim – the electronic bracelet may create a false sense of security. If the victim becomes less cautious, relying on the alarm system, the risk of repeat victimization may actually increase.

4. From the perspective of objective circumstances – urgent measures last 32 days (2 + 30) and require the rapid reaction of the police and prosecution. The monitoring of the implementation of these measures relies primarily on reports from the victim or the detection of violations by the police, not on continuous technical surveillance. In practice, it is very difficult to ensure constant monitoring due to limited resources and the number of police officers, insufficient network coverage in the Republic of Serbia, the small number of available devices, as well as the short duration of urgent measures compared to the large number of imposed urgent measures. Furthermore, applying bracelets in one part of the country but not in another would also represent a violation of human rights.

On the other hand, in countries that have urgent measures, such as Austria, electronic bracelets have not existed nor been used since as far back as 2007. Even though Austria amended its law in January 2020, the amendment only introduced mandatory coordination for high-risk cases and did not deal with preventive urgent measures. Despite such extensive experience in those countries, electronic bracelets remain linked to criminal proceedings, which in our system would correspond to the measure of Prohibition of approaching, meeting, or communicating with a specific person and visiting certain places under Article 197 of the Criminal Procedure Code, or the Prohibition of approaching and communicating with the injured party under Article 89a of the Criminal Code. This clearly shows, through the experience of applying the Law, that it is far more important to emphasize inter-institutional cooperation and the provision of support services to victims.

5. Within the recommendations concerning the initiation of misdemeanour proceedings in cases of breached urgent measures, the amendments to the Law on the Prevention of Domestic Violence, in Article 32 relating to records, provide for the introduction and recording of penalties imposed for misdemeanours committed under Article 36 of this Law. Furthermore, the Ministry of Interior, in cooperation with other ministries, is considering technical and organizational solutions to ensure the systematic recording of such information in unified databases, which would enable a more comprehensive analysis and more precise monitoring of the implementation of the Law.

6. The report also stresses the need to ensure protection in favour of victims of domestic violence, including their children, in order to guarantee their safety within their own homes. In this regard, we underline that the competent police officer, during each risk assessment, also requests the opinion of the Centre for Social Work, while in coordination and cooperation groups, every reported case of domestic violence or other criminal offense under Article 4 of the Law on the Prevention of Domestic Violence is jointly reviewed, with the aim of ensuring the protection of children as secondary victims of violence occurring between their parents.

7. Therefore, the existing framework already provides victim-cantered protection through preventive urgent measures, inter-institutional coordination, and support services, making the introduction of electronic monitoring measures neither necessary nor justified.

