

SHADOW REPORT TO GREVIO

**First Thematic Evaluation Round: “Building Trust by Delivering Support,
Protection and Justice”
North Macedonia**

**By the National Network to End Violence against Women and Domestic
Violence**

CONTACTS

www.glasprotivnasilstvo.org.mk

coordinator@glasprotivnasilstvo.org.mk

Elena Dimushevska: dimushevska@glasprotivnasilstvo.org.mk

Ana Avramoska Nushkova: avramoska@glasprotivnasilstvo.org.mk

September 2026

Table of Contents

Executive Summary	4
Introduction	8
PART I. CHANGES IN COMPREHENSIVE AND CO-ORDINATED POLICIES, FUNDING AND DATA COLLECTION	
.....	10
Article 7 – Comprehensive and co-ordinated policies	10
Article 8 – Financial resources	11
Article 11 – Data collection and research	13

PART II. IMPLEMENTATION OF SELECTED PROVISIONS IN THE AREAS OF PREVENTION, PROTECTION AND PROSECUTION	15
Article 12 – General obligations	15
Article 14 – Education	18
Article 16 – Preventive intervention and treatment programmes	21
Article 18 – General obligations and multi-agency co-operation	23
Article 20 – General support services	25
Article 22 – Specialist support services	27
Article 25 – Support for victims of sexual violence	35
Article 31 – Custody, visitation rights and safety	40
Article 51 – Risk assessment and risk management	47
PART III – EMERGING TRENDS IN VIOLENCE AGAINST WOMEN AND DOMESTIC VIOLENCE	57
Digital manifestations of violence against women – Question 56(a)	57

EXECUTIVE SUMMARY

North Macedonia has continued to strengthen its legislative, policy and institutional framework for preventing and combating violence against women and domestic violence since GREVIO's baseline evaluation in 2023. Important developments include further institutionalisation and licensing of specialist services, expanded professional training, development of new strategic and data-collection frameworks, standardised risk-assessment procedures, strengthened multisectoral mechanisms and recent criminal-law reforms addressing technology-facilitated forms of violence. The central finding of this shadow report, however, is that progress in the formal legal and institutional framework has not yet been matched by equally consistent, adequately financed and measurable implementation in practice. Across the areas examined, a recurring distinction emerges between the formal existence of a law, strategy, protocol, service, licence or procedural safeguard and its actual accessibility, functionality and effectiveness for women experiencing violence.

This is a persistent implementation challenge. The National Network's five-year monitoring of the National Action Plan for the Implementation of the Istanbul Convention 2018–2023 found that, of 50 monitored activities, only 10 had been fully implemented, 24 had been initiated but remained incomplete or progressed slowly, while 16 had not been initiated. Most fully implemented activities concerned legislative reform.¹ The subsequent 2025 performance audit by the State Audit Office, applying its own methodology, reached a comparable systemic conclusion: of 52 activities, 22 had been implemented, 10 partially implemented and 20 not implemented, while the measures undertaken by the competent institutions were assessed as insufficiently effective to ensure prevention, protection, support and reintegration of women victims of gender-based and domestic violence. The convergence of civil society monitoring and independent institutional audit findings demonstrates that the gap between formal commitments and effective implementation should be central to the next policy cycle.²

The development of the new National Strategy for Prevention and Protection from Gender-Based Violence against Women and Domestic Violence 2027–2034 therefore represents an important opportunity. Its impact will depend not only on timely adoption, but on translation into a fully costed and adequately financed action plan with clear institutional responsibilities, measurable indicators, deadlines and regular public monitoring. The experience of the previous Action Plan demonstrates that adoption of a comprehensive policy framework is not sufficient without effective implementation and accountability.

A major systemic concern remains the financing, geographical distribution and sustainability of specialist support services. Women's rights organisations provide a substantial part of specialist support and in some areas remain the only available specialist providers, yet many continue to depend on short-term project and donor financing. Licensing has strengthened their formal

¹National Network to End Violence against Women and Domestic Violence, Summary Report on the Progress of the Republic of North Macedonia in the Implementation of the National Action Plan for the Implementation of the Istanbul Convention, October 2018–October 2023, Skopje, November 2023 MKD [link](#).

²State Audit Office of the Republic of North Macedonia, Final Performance Audit Report: Implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention), with a Focus on Specialist Services for Women Victims of Gender-Based Violence and Domestic Violence, Skopje, June 2025 EN [link](#).

recognition but does not guarantee sustainable financing, adequate staffing or continuity of service provision. Independent evidence confirms substantial territorial disparities and deficiencies in the functionality of existing services. The National Network's 2026 At What Cost? analysis further identifies significant financing gaps and estimates that an additional 377 shelter places would be required to meet the applicable minimum standard. Sustainable public financing should therefore be predictable, preferably multiannual, and based on the actual operational costs of Convention-compliant services.³

These shortcomings are particularly visible in the response to sexual violence and in long-term recovery and reintegration. Although three sexual violence referral centres have been established, geographical coverage, multidisciplinary staffing, continuous availability, forensic capacity and longer-term specialist support remain insufficient. Healthcare and psychosocial support should be available irrespective of whether a victim is ready to report to the police, and the system should enable consent-based collection and preservation of forensic evidence where a victim needs time before deciding whether to pursue criminal proceedings. At the same time, the Reintegration Programme adopted in September 2024 remains insufficiently operationalised and lacks dedicated financing. Without coordinated access to safe and longer-term housing, income, employment, childcare, healthcare and psychosocial support, women may remain economically dependent or face pressure to return to unsafe environments.

Persistent weaknesses are also evident in multi-agency co-operation, risk assessment and risk management. Formal protocols and standardised tools provide an important basis for protection, but information concerning repeated violence, threats, coercive behaviour, separation, previous reports and other risk indicators is not always consolidated across institutions into a timely assessment of cumulative and escalating danger. Risk assessment should operate as a dynamic and continuous multi-agency process in which each new incident or significant development triggers reassessment against the complete known history of violence.

The killing of Rosica K. and her father in September 2025, following previous institutional contacts and subsequent confirmation by the Ministry of Interior of shortcomings in police handling of some earlier reports, illustrates the potentially grave consequences when repeated incidents do not generate an escalating protection response. In this context, the Femicide Watch mechanism, the Multisectoral Working Body and the development of the Femicide Observatory/platform represent important developments. Their full institutionalisation could enable systematic review of femicides and attempted femicides, identification of recurring risk factors and institutional shortcomings, and translation of lessons from individual cases into improvements in policy and practice.⁴ The urgency of strengthening femicide prevention is demonstrated by the National Network's monitoring data, according to which six women were killed and four attempted killings were recorded in 2025, while seven women had already been

³National Network to End Violence against Women and Domestic Violence, Neda Chalovska Dimovska, Katerina Shapkova Kocavska and Elena Dimushevska, At What Cost? Costs of Specialist Services for Gender-Based Violence in North Macedonia, 2026 still not published google drive [link](#).

⁴Ministry of Interior of the Republic of North Macedonia, findings of the Department for Internal Control concerning the handling of previous reports in the case of Rosica Kocava, 26 September 2025 [link](#).

killed and two attempted killings recorded between January and September 2026.⁵ Despite the recognition of gender-based murder as a qualified form of homicide in 2023, its application remains exceptional. The ongoing Kumanovo proceedings concerning the alleged murders of four women and two attempted murders further raise serious questions regarding the initial investigation of women's deaths, decisions concerning autopsies, institutional information exchange and the capacity to identify patterns of repeated violence.

Effective protection also requires a violence informed approach throughout judicial and administrative proceedings. Domestic and gender-based violence is not yet systematically screened for and assessed in all custody and visitation proceedings, while there is no unified violence-sensitive risk-assessment methodology. The safety of the child and the non-abusive parent should take precedence over assumptions concerning continued contact or shared parenting where violence is present. Procedural safeguards against confrontation and secondary victimisation likewise remain uneven in practice, with video links, separate spaces and remote-testimony facilities not systematically available across courts.

These implementation gaps are reinforced by weaknesses in data and professional capacity. Existing institutional databases do not yet enable systematic tracking of the same case from initial reporting through police, social services, prosecution and courts to its final outcome, limiting assessment of attrition, repeated victimisation and institutional effectiveness. Professional training has expanded, particularly within police and social protection, but systematic and mandatory initial and continuous specialised training remains necessary, particularly for judges, prosecutors and healthcare professionals. Its effectiveness should be assessed through changes in professional practice, rather than solely through the number of trainings or participants.

Prevention similarly requires greater emphasis on sustained transformation of harmful gender norms rather than reliance predominantly on awareness-raising campaigns. Core age-appropriate education on equality, consent, healthy relationships, gender-based and sexual violence and digital safety should reach all pupils. Prevention policies should also include sustained programmes engaging men and boys and measurable interventions addressing the structural and gendered causes of violence.

The growing digital dimension of violence against women requires particular attention. The introduction of Article 152-a of the Criminal Code in 2026, addressing misuse and non-consensual dissemination of sexually explicit and manipulated material, is an important development. Technology-facilitated violence should nevertheless be recognised and addressed, where applicable, as part of a continuum of gender-based violence, stalking, coercive control, sexual violence and post-separation abuse. Digital monitoring, impersonation, threats to publish intimate material and technology-facilitated stalking should therefore also be incorporated into risk assessment and safety planning.⁶

Across all these areas, intersectionality must move from policy recognition to practical accessibility. Women living in rural areas, Roma women, women with disabilities and other

⁵ National Network to End Violence against Women and Domestic Violence, ongoing monitoring data on killings and attempted killings of women, 2025–September 2026.

⁶ Criminal Code amendments, Official Gazette of the Republic of North Macedonia No. 16/2026, Article 152-a.

women facing multiple and intersecting forms of discrimination may experience compounded barriers where services are geographically distant, physically inaccessible, unaffordable to reach or unavailable in a language they understand. Access to essential protection and support should not depend on a woman's place of residence or on the existence of a temporary donor-funded project.

Overall, the evidence examined in this report indicates that the next phase of implementation of the Istanbul Convention in North Macedonia should focus on moving from formal compliance towards effective, adequately financed, geographically accessible and accountable implementation. Progress should ultimately be measured not by the number of laws adopted, services licensed, protocols developed or professionals trained, but by whether women experiencing all forms of gender-based violence can obtain timely protection, specialist support, effective risk management and access to justice, and whether institutional intervention enables their long-term safety, recovery and independence.

General recommendations

The authorities should prioritise:

- timely adoption and fully funded implementation of the new national strategic framework, with measurable responsibilities, indicators and accountability mechanisms;
- predictable, cost-based and preferably multiannual public financing for geographically accessible specialist women's services, including comprehensive sexual-violence services and effective reintegration measures;
- dynamic multi-agency risk assessment and risk management based on the complete history and escalation of violence, together with institutional accountability and systematic review of femicides and attempted femicides;
- violence-informed custody and visitation decisions and consistent procedural safeguards against confrontation, repeated victimisation and secondary victimisation;
- interoperable and sufficiently disaggregated administrative data and mandatory specialised initial and continuous professional training;
- sustained prevention addressing harmful gender norms and ensuring age-appropriate education on equality, consent, healthy relationships, sexual and gender-based violence and digital safety; and
- recognition, monitoring and effective response to technology-facilitated violence as part of the continuum of violence against women, while ensuring that all prevention, protection, support and justice measures are accessible to women facing multiple and intersecting forms of discrimination.

INTRODUCTION

This shadow report is submitted by the National Network to End Violence against Women and Domestic Violence in the framework of GREVIO's first thematic evaluation round, *"Building trust by delivering support, protection and justice"*. It provides an independent civil society assessment of the implementation of selected provisions of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention) in North Macedonia, in accordance with the scope of GREVIO's thematic questionnaire.

The report builds on GREVIO's 2023 baseline evaluation and focuses primarily on developments and implementation since that evaluation. It does not seek to reassess all aspects of compliance with the Convention. Rather, it examines areas covered by the thematic evaluation in which civil society monitoring, independent institutional findings, administrative and judicial information, research and the practical experience of specialist women's organisations indicate progress, persistent implementation gaps or emerging concerns.

The National Network has been actively engaged in monitoring the implementation of the Istanbul Convention since its ratification and has continuously followed the implementation of the National Action Plan for the Implementation of the Istanbul Convention 2018–2023. Its five-year summary monitoring assessment found that, of 50 monitored activities, 10 had been fully implemented, 24 had been initiated but remained incomplete or progressed slowly, while 16 had not been initiated. Most of the fully implemented activities concerned legislative reform. The monitoring therefore identified at an early stage a significant gap between progress in legislative alignment and implementation in other areas.⁷

This longer-term monitoring perspective informs the approach taken in the present report. Particular attention is paid to whether legislative, policy and institutional developments have translated into effective protection and support in practice. Accordingly, the analysis distinguishes between the formal existence of laws, strategies, protocols, services, licences, training programmes and procedural safeguards and their actual implementation, accessibility, sustainability and impact on women experiencing violence. The report draws primarily on monitoring and research conducted by the National Network and its member organisations, including their direct experience in providing specialist support to women victims of violence. It also relies on findings of the State Audit Office, available administrative and judicial information, court monitoring and documented cases, analyses of the availability and costs of specialist services, relevant civil society and international reports, and official institutional information where necessary. Particular weight is given to the findings of the 2025 State Audit Office performance audit on the implementation of the Istanbul Convention and specialist services. As an independent state oversight institution, the State Audit Office provides an important institutional assessment of whether the measures and resources devoted to implementation have produced effective results. Its findings concerning incomplete implementation of the previous Action Plan, inadequate costing, insufficient geographical coverage and functionality of specialist services and weaknesses in monitoring

⁷National Network, Summary Report on the Implementation of the National Action Plan for the Istanbul Convention, 2023.

complement the evidence generated through civil society monitoring. The audit concluded that the measures undertaken by competent institutions concerning specialist services were not sufficiently effective to ensure prevention, support, protection and full reintegration of women victims of gender-based and domestic violence.⁸ The report further draws on the National Network's recent research, including the 2026 study *At What Cost? Costs of Specialist Services for Gender-Based Violence in North Macedonia*, which examines the availability, financing and actual costs of specialist services. The study provides evidence of continuing disparities in geographical coverage and capacity, dependence on short-term financing and the substantial role played by women's civil society organisations in maintaining specialist support services, including in areas where they are the only available providers.⁹ Where relevant, the report uses documented individual cases to examine how the institutional framework functions in practice. Such cases are not presented as representative statistical evidence. They are used to illustrate serious or recurring weaknesses in institutional responses, particularly where information concerning previous violence, repeated reports, escalation, protection measures or institutional contacts makes it possible to assess how existing procedures operated in concrete situations. The analysis also takes into account ongoing policy developments. In particular, it considers the draft National Strategy for Prevention and Protection from Gender-Based Violence against Women and Domestic Violence 2027–2034, developed within the National Coordination Body for the Implementation of the Istanbul Convention, in which the National Network participates as a member. The draft Strategy is treated as an ongoing policy development rather than an implemented measure, and its potential contribution is assessed in light of the implementation experience of the previous policy cycle. The current draft recognises, among other issues, the digital dimension of violence and intersectional discrimination.¹⁰ A cross-cutting consideration throughout the report is the situation of women facing multiple and intersecting forms of discrimination. Particular attention is paid to whether services and protection mechanisms are accessible in practice to women living in rural areas, Roma women, women with disabilities, LBT women, asylum-seeking and refugee women, women without regulated legal status and other women who may experience additional barriers. Formal availability is therefore not treated as sufficient where geographical distance, physical inaccessibility, language, financial barriers, institutional practice or lack of specialised support prevents women from effectively exercising their rights. The report also examines emerging challenges, particularly the digital dimension of violence against women. Recent developments demonstrate that technology-facilitated violence increasingly intersects with intimate-partner violence, stalking, sexual violence, coercive control and post-separation abuse. The report therefore approaches digital manifestations not as a separate phenomenon, but as part of the broader continuum of violence against women, consistent with GREVIO General Recommendation No. 1. The final section specifically examines recent criminal-law developments

⁸State Audit Office, Final Performance Audit Report on the Implementation of the Istanbul Convention, June 2025.

⁹ National Network, *At What Cost?*, 2026.

¹⁰National Coordination Body for the Implementation of the Istanbul Convention, Draft National Strategy for Prevention and Protection from Gender-Based Violence against Women and Domestic Violence 2027–2034, working draft, August 2026. The National Network participates as a member of the National Coordination Body MKD [link](#).

and the introduction of Article 152-a of the Criminal Code addressing non-consensual dissemination and misuse of sexually explicit and manipulated material.¹¹

The purpose of this submission is ultimately to support GREVIO's assessment of whether the progress achieved since the baseline evaluation is translating into effective, accessible and sustainable protection, support and justice for women experiencing violence. While acknowledging legislative, policy and institutional progress, the report focuses on the remaining gap between formal compliance and practical implementation and identifies measures necessary to strengthen accountability, institutional co-ordination, sustainable financing, specialist support, risk management and access to justice.

PART I. CHANGES IN COMPREHENSIVE AND CO-ORDINATED POLICIES, FUNDING AND DATA COLLECTION

Article 7 – Comprehensive and co-ordinated policies

Since GREVIO's baseline evaluation, North Macedonia has continued to develop its legal and policy framework on violence against women. However, the principal challenge remains the transition from formal commitments to a comprehensive and effectively implemented policy response covering all forms of violence against women. This implementation gap was confirmed by the State Audit Office in its 2025 performance audit on the implementation of the Istanbul Convention. Of the 52 activities foreseen under the 2018–2023 Action Plan, only 22 were fully implemented, while 20 were not implemented and 10 were partially implemented. The audit further found that, following the expiry of the Action Plan, continuity of systemic action at national level had not been ensured through a new national strategy. More broadly, the State Audit Office concluded that the measures and activities undertaken by the competent institutions were not sufficiently effective to ensure prevention, protection, support and reintegration of women victims of gender-based and domestic violence.¹² The preparation of the new National Strategy for Prevention and Protection from Gender-Based Violence against Women and Domestic Violence 2027–2034 represents an important opportunity to address this policy gap. The current working draft introduces an integrated approach across prevention, protection and support, recognises the digital dimension of violence against women and explicitly incorporates victim-centred, gender-sensitive and intersectional principles. It identifies integrated policies and data collection, prevention, and an effective system of protection and support as its principal strategic objectives.¹³ These developments are welcome. However, at the time of preparation of this report, the Strategy remains a forward-looking policy framework. Its significance will depend on its formal adoption and translation into a sufficiently detailed and budgeted action plan, with clearly assigned institutional responsibilities, measurable indicators, timelines and regular monitoring of

¹¹ GREVIO, General Recommendation No. 1 on the digital dimension of violence against women, adopted 20 October 2021 [link](#).

¹² State Audit Office, Final Performance Audit Report, June 2025, pp. 2–3.

¹³ National Coordination Body, Draft National Strategy 2027–2034, working draft, August 2026, pp. 4–5 and 40–47.

implementation and outcomes. A further concern is whether the future policy framework will effectively move beyond the still predominant institutional focus on domestic violence and provide an operational response to all forms of violence covered by the Istanbul Convention. This is particularly relevant because the first thematic evaluation specifically examines policy developments concerning stalking, sexual harassment, domestic violence including its digital dimension, rape and sexual violence, female genital mutilation, forced marriage, forced abortion and forced sterilisation.¹⁴ The explicit recognition of the digital dimension of violence in the draft Strategy is therefore a positive development, but recognition in a strategic document must be followed by concrete prevention, protection, investigation and support measures adapted to these forms of violence. The draft Strategy also explicitly recognises intersectional discrimination and the need to ensure accessibility for women and girls facing additional barriers, including women with disabilities, Roma women, LBT women, women living in rural areas, asylum-seeking and refugee women and women without regulated legal status.¹⁵ This represents an important policy commitment. Its effectiveness, however, will depend on whether these principles are translated into targeted measures, accessible services and measurable indicators demonstrating that women facing multiple and intersecting forms of discrimination actually benefit from prevention and protection policies. The experience with the previous Action Plan demonstrates that the existence of a comprehensive policy framework alone does not ensure implementation. The next policy cycle should therefore place substantially greater emphasis on implementation, accountability and measurable results.

Recommendation: The authorities should ensure the timely adoption and effective implementation of the National Strategy 2027–2034 through a fully costed and adequately funded action plan, with clear institutional responsibilities, deadlines, measurable indicators and regular public monitoring of results. Implementation should ensure an operational response to all forms of violence against women covered by the Istanbul Convention, including their digital manifestations, and translate the Strategy’s intersectional commitments into accessible and targeted prevention, protection and support measures for women facing multiple and intersecting forms of discrimination.

Article 8 – Financial resources

Adequate and sustainable financing remains a major obstacle to the effective implementation of the Istanbul Convention in North Macedonia, particularly with regard to specialist support services provided by women’s rights organisations. Although gender-responsive budgeting is formally incorporated into the public finance framework, recent evidence indicates that this has not yet resulted in transparent, predictable and cost-based financing of measures and services addressing

¹⁴ GREVIO, Questionnaire for the Evaluation of the Implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence by the Parties – 1st Thematic Evaluation Round: Building Trust by Delivering Support, Protection and Justice, GREVIO/Inf(2022)31, Article 7, Question 1, p. 4.

¹⁵ National Coordination Body, Draft National Strategy 2027–2034, working draft, August 2026, pp. 4–5 and 40–47.

violence against women. The 2026 National Network study *At What Cost? Costs of Specialist Services for Gender-Based Violence in North Macedonia* examined public expenditure and the actual and projected costs of providing specialist services in accordance with the Istanbul Convention. The study found that, despite the formal integration of gender-responsive budgeting, its practical application remains limited. Specialist services are not consistently supported through separate and traceable budget lines, while strategic and planning documents do not systematically specify budgets, indicators and responsible institutions.¹⁶ The problem is particularly significant for specialist services provided by women's rights organisations. Women's civil society organisations provide a substantial part of the available specialist support, including SOS helplines, shelters, counselling, legal assistance and psychosocial support, and in some regions are the only providers of such services. Nevertheless, they continue to operate without stable institutional support and remain dependent on short-term project and donor financing. This affects their capacity to retain qualified specialised staff, maintain continuity of services and plan their work over the longer term.¹⁷ Available financing data also demonstrate the instability of public support. Public allocations through the relevant financing mechanism for organisations providing specialist victim-support services amounted to approximately MKD 4 million in 2023, MKD 6 million in 2024 and MKD 4.6 million in 2025. Rather than demonstrating a progressive transition towards stable financing, the amounts fluctuate from year to year. At the same time, the *At What Cost?* study records an increase in reported cases of gender-based and domestic violence from 1,543 in 2022 to 1,690 in 2023 and 1,836 in 2024, with women accounting for more than 80% of reported victims.¹⁸

A further structural problem is that public financing is not systematically based on the actual cost of providing Convention-compliant specialist services. The State Audit Office found in 2025 that the cost analysis for specialist domestic and sexual violence services envisaged under the 2018–2023 Action Plan had not been carried out. According to the audit, this resulted in an absence of realistic planning of the necessary resources and contributed to a situation in which a significant proportion of established specialist services were not functional, while financing provided as a monthly amount per beneficiary may be insufficient to ensure quality specialist service provision.¹⁹ The *At What Cost?* study addresses this gap by calculating the real costs and projected financing needs of specialist services for the coming period. Its analysis shows why financing based predominantly on the number of beneficiaries does not necessarily reflect the actual operational costs of a service. This is particularly evident for shelters, where essential expenditure for safe premises, utilities, security and continuous staffing remains largely fixed irrespective of occupancy. The study therefore identifies a risk of chronic underfunding where financing is linked

¹⁶ National Network, *At What Cost?*, 2026, Executive Summary and sections on gender-responsive budgeting and financing of specialist services.

¹⁷ National Network to End Violence against Women and Domestic Violence, *At What Cost?*, 2026, section on the role and financing of civil society providers of specialist services, submitted to GREVIO as supporting material.

¹⁸ National Network to End Violence against Women and Domestic Violence, *At What Cost?*, 2026, Introduction. The study records 1,543 reported cases in 2022, 1,690 in 2023 and 1,836 in 2024 and states that women accounted for more than 80% of victims.

¹⁹ State Audit Office, *Final Performance Audit Report*, June 2025, p. 8.

primarily to the number of beneficiaries.²⁰ The study consequently recommends revising the existing methodology for calculating the costs of specialist services so that it reflects the real operational needs of licensed providers and ensures their financial sustainability. It also recommends the introduction of separate budget lines for individual specialist services and stable medium-term financing aligned with projected needs.²¹ The available evidence therefore indicates that the central financing challenge is not simply whether public funds are allocated, but whether such funding is adequate, predictable, traceable and linked to the actual costs of providing quality services. The continued dependence of women's rights organisations on short-term and donor financing leaves essential services vulnerable to interruptions and makes their long-term sustainability uncertain, particularly in areas where civil society organisations are the principal or only specialist providers.

Recommendation: The authorities should establish dedicated and transparent budget lines for measures and specialist services addressing violence against women and introduce predictable multiannual public financing based on realistic costing and projected service needs. The financing methodology should cover the actual operational costs of licensed specialist providers, including adequate specialised staff, premises, equipment and continuous service provision, and should ensure equitable geographical availability. Women's rights organisations providing specialist services should receive sustainable public financing commensurate with their role in the national protection system, rather than remaining dependent predominantly on short-term project and donor funding.

Article 11 – Data collection and research

Reliable, harmonised and sufficiently disaggregated data remain a significant challenge in North Macedonia and continue to limit the assessment of the prevalence of violence against women, institutional responses and case outcomes across the protection and criminal justice systems.

Some progress has been made towards integrated data collection. A multi-institutional model has been developed using common categories such as the form of violence, sex and age of the victim and the victim–perpetrator relationship, while the SWISS system provides a basis for centralised recording of cases within the social protection system. However, the development of this architecture should not be equated with a fully operational and interoperable national data system. The new integrated software for Centres for Social Work is still being established, and the

²⁰ National Network to End Violence against Women and Domestic Violence, *At What Cost?*, 2026, section on shelter financing and projected costs. The study finds that a per-user costing model does not provide a sufficiently reliable basis for sustainable shelter operation because essential operating costs remain largely fixed irrespective of occupancy.

²¹ National Network to End Violence against Women and Domestic Violence, *At What Cost?*, 2026, Executive Summary, recommendations on costing methodology, separate budget lines and medium-term financing, submitted to GREVIO as supporting material.

Rulebook regulating integrated statistical and administrative data collection on gender-based violence and domestic violence is envisaged only after the system becomes fully operational.²² Significant limitations also remain within the judiciary. The Basic Civil Court Skopje reported that the ACMIS case-management system does not allow sufficiently detailed and structured identification of domestic violence cases. Relevant information on victims, perpetrators and protection measures therefore has to be retrieved through manual searches of case files, and the Court has requested an upgrade of ACMIS to enable systematic tagging and filtering of such cases.²³ The ability of individual courts to extract information manually from files cannot substitute for a harmonised national data system.

Most importantly, the existing institutional databases do not yet enable the same case to be followed systematically across the police, Centres for Social Work, prosecution services and courts. Consequently, it is still not possible to determine comprehensively how many reports result in prosecution, how many proceedings are discontinued and for what reasons, how many result in convictions, what sanctions are imposed and how long proceedings take. This prevents reliable calculation of attrition rates and identification of the stages at which cases of violence against women are lost within the criminal justice system. The information provided by the judiciary itself acknowledges that individual courts cannot track the entire institutional pathway of a case without stronger inter-institutional exchange and interoperability.²⁴

Important data gaps also concern protection measures. Although figures exist on temporary protection measures proposed by Centres for Social Work and imposed by courts, comprehensive disaggregated data on breaches of emergency and temporary protection orders, sanctions for such breaches and subsequent revictimisation are not systematically available. Nor is there comprehensive national data allowing analysis of custody and visitation decisions in cases involving domestic violence.²⁵ These gaps significantly limit the possibility of assessing whether protection measures actually prevent repeated violence. Data on forms of violence other than domestic violence also remain limited. This is particularly visible in relation to sexual violence: administrative statistics recorded only 6 cases in 2022, 15 in 2023 and 12 in 2024, compared with substantially higher numbers recorded for physical and psychological violence.²⁶ These figures should not be interpreted as evidence of low prevalence; rather, they need to be considered in the context of barriers to disclosure, identification, reporting and access to specialist support. The limited availability and use of specialist services for victims of sexual violence is further addressed

²² Government of North Macedonia, Reply to GREVIO's Questionnaire for the First Thematic Evaluation Round – Building Trust by Delivering Support, Protection and Justice, 2026, Article 11. The response states that the new integrated software system for Centres for Social Work is being established and that the Rulebook on integrated collection and processing of statistical and administrative data on gender-based violence and domestic violence is to be prepared following its full establishment.

²³ Ibid., Article 11, information provided by the Basic Civil Court Skopje concerning ACMIS. The Court reported the need for an upgrade enabling more detailed categorisation and filtering of domestic violence cases and indicated that the relevant information was currently obtained through manual searches.

²⁴ Ibid., Article 11. Information submitted by the judiciary indicates that tracking the complete pathway of individual cases requires inter-institutional exchange and further integration of existing data systems.

²⁵ Ibid. At the time of preparation of the thematic response, information concerning breaches and sanctions related to protection measures and certain custody/parental-rights data was still being collected.

²⁶ Ibid., Article 11. Administrative data record 6 cases of sexual violence in 2022, 15 in 2023 and 12 in 2024.

under Article 25. The system also remains insufficient for an intersectional assessment of violence against women. Basic demographic disaggregation does not make it possible to systematically assess differences in reporting, access to protection and services, or justice outcomes for women with disabilities, Roma women, women in rural areas, migrant and refugee women and other women facing intersecting forms of discrimination. The central challenge under Article 11 is therefore no longer simply the absence of data collection by individual institutions, but the fragmentation and limited interoperability of the data collected. Without the ability to connect institutional records and follow cases from the initial report to the final outcome, the authorities cannot reliably assess attrition, repeated violence, effectiveness of protection measures or the functioning of the criminal justice response. This also limits evidence-based planning of specialist services and accountability for implementation of the Convention.

Recommendation: The authorities should fully operationalise a unified and interoperable system for the collection of data on all forms of violence against women covered by the Istanbul Convention, based on harmonised definitions and indicators across the police, prosecution services, courts, social welfare and healthcare sectors. The system should enable cases to be followed from initial reporting to final outcome and allow systematic analysis of attrition and conviction rates, breaches of protection orders, revictimisation and relevant custody and visitation decisions. Data should be regularly published and sufficiently disaggregated to enable an intersectional assessment, while fully respecting personal data protection requirements.

PART II. IMPLEMENTATION OF SELECTED PROVISIONS IN THE AREAS OF PREVENTION, PROTECTION AND PROSECUTION

Article 12 – General obligations

Primary prevention of violence against women requires measures that go beyond awareness raising and reporting and address the gender stereotypes, discriminatory attitudes and structural inequalities that create and perpetuate violence against women. This distinction remains particularly relevant in North Macedonia, where prevention activities have continued since GREVIO's baseline evaluation, but available evidence of sustained and systematic interventions aimed at transforming harmful gender norms remains limited. North Macedonia has an established legal and policy basis for such measures. GREVIO's baseline evaluation noted that the Law on Prevention and Protection from Violence against Women and Domestic Violence linked prevention to the promotion of gender equality and the elimination of gender stereotypes. It also referred to work on a National Action Plan on Gender-Based Violence Prevention Involving Boys, Men and Fathers and welcomed its envisaged focus on increasing public awareness of the role of men and boys in primary prevention, strengthening institutional capacities for systematic educational programmes and establishing programmes for the involvement of boys and men in preventing gender-based violence. However, according to information available to the National Network, although work was undertaken on preparing such a plan, it was never formally adopted

and therefore did not become an operative policy instrument.²⁷ Since the baseline evaluation, the authorities have continued to implement prevention and awareness-raising activities. Campaigns and communication activities have focused on recognising violence, encouraging reporting, informing women about available services and reinforcing the message that domestic and gender-based violence are not private matters. Preventive activities have also been implemented through the Ministry of Interior and in cooperation with local authorities and civil society organisations. These activities are relevant and necessary, particularly for increasing awareness of available protection and support. The Ministry's own description of the campaign "*We Are With You – Together Against Violence against Women and Girls*", for example, places considerable emphasis on reporting, institutional responsibility and informing victims that institutions are available to support them.²⁸ However, the available information provides substantially more evidence of awareness raising and encouragement of reporting than of sustained primary prevention interventions designed to transform the underlying social and gender norms that contribute to violence. This distinction is important. GREVIO already observed in its baseline evaluation that awareness campaigns had predominantly addressed domestic violence and called for prevention efforts to address the gendered nature of violence, changes in mentalities and attitudes, structural inequalities between women and men and the empowerment of women.²⁹ In particular, despite the preparatory work on a proposed Action Plan concerning the involvement of boys, men and fathers, the absence of its formal adoption means that North Macedonia still lacks an operative national framework in this area. The information available for the present thematic evaluation does not demonstrate the development of a continuous, nationwide and institutionally embedded programme engaging men and boys as agents of change, nor does it provide evidence of sustained public financing, coverage or measured impact. This gap is significant because the thematic questionnaire specifically asks what measures have been taken to encourage men and boys to actively contribute to preventing all forms of violence against women. Some relevant initiatives are being implemented by civil society organisations on a project basis. HERA, a member organisation of the National Network, opened the first MM Centre for counselling and support for boys and men in May 2024, offering free counselling by psychotherapists and psychologists in Macedonian and Albanian. While this is an important specialised initiative, project-based civil society action cannot substitute for a formally adopted, adequately funded and nationwide state policy for the systematic engagement of men and boys in preventing gender-based violence.³⁰ A similar concern arises in relation to women and girls exposed to multiple and intersecting forms of discrimination. GREVIO's baseline evaluation identified significant barriers affecting women

²⁷ GREVIO, Baseline Evaluation Report – North Macedonia, GREVIO/Inf(2023)5, paras. 88–89. GREVIO referred to work on a National Action Plan on Gender-Based Violence Prevention Involving Boys, Men and Fathers; according to information available to the National Network, the plan was never formally adopted.

²⁸ Ministry responsible for social policy, "We Are With You – Together Against Violence against Women and Girls" campaign. The campaign focuses, inter alia, on raising awareness that domestic violence is not a private matter, informing victims about institutional support and encouraging reporting.

²⁹ GREVIO, Baseline Evaluation Report – North Macedonia, GREVIO/Inf(2023)5, para. 89.

³⁰ HERA – Health Education and Research Association, "HERA opened the first MM Centre for counselling and support for boys and men", 14 May 2024, available at: <https://hera.org.mk/hera-otvoren-prviot-mm-czentar-za-sovetuvane-i-poddrshka-na-momchina-i-mazhi/>.

with disabilities, Roma women, women belonging to minority groups, migrant and asylum-seeking women, LGBTI women, elderly women and women living in rural areas, among others, and called for their perspectives to be integrated into the design, implementation, monitoring and evaluation of policies on violence against women.³¹ While recent communication and outreach activities have included women and girls in vulnerable situations, the available information does not demonstrate a systematic primary prevention approach tailored to the specific forms of discrimination, harmful practices and barriers affecting different groups of women. The development of the new National Strategy for Prevention and Protection from Gender-Based Violence against Women and Domestic Violence provides an important opportunity to address these shortcomings and move from predominantly campaign-based prevention towards a more structured model. The working policy framework places prevention among the strategic areas for the next policy cycle and incorporates gender equality, intersectionality and the need to address discriminatory norms. Its effectiveness will, however, depend on whether these commitments are translated into specific, adequately funded and measurable prevention programmes, with identified target groups, responsible institutions, timelines and indicators capable of measuring changes in attitudes and behaviour, rather than merely the number of activities or persons reached.³² This is particularly important in the current policy environment. The National Network has documented developments during 2025–2026 indicating increasing resistance to gender-equality concepts in public and policy debates, including initiatives affecting references to gender equality in education-related policies and legislation.³³ Such developments are relevant to Article 12 because prevention depends precisely on the State's ability to consistently challenge stereotypes and discriminatory attitudes concerning the roles of women and men. Recent developments concerning comprehensive sexuality education illustrate the practical relevance of this concern. In September 2026, the Ministry of Education and Science announced the withdrawal and revision of the comprehensive sexuality education programme/elective subject in secondary education following public reactions. As the programme addressed issues relevant to equality, non-discrimination, healthy relationships, consent and prevention of violence, the development raises questions about the continuity of educational prevention measures addressing harmful gender norms. This issue is examined in greater detail under Article 14. Overall, North Macedonia has continued to undertake prevention and awareness-raising activities and is currently developing a new strategic framework. The remaining challenge is to ensure that primary prevention is treated as a sustained policy intervention rather than predominantly as a series of campaigns. This requires long-term programmes capable of addressing harmful gender norms and structural inequalities, meaningful engagement of men and boys, targeted measures for women and girls exposed to intersecting discrimination, and systematic evaluation of whether prevention measures actually produce changes in attitudes and behaviour.

³¹ GREVIO, Baseline Evaluation Report – North Macedonia, GREVIO/Inf(2023)5, para. 27.

³² National Coordination Body, Draft National Strategy for Prevention and Protection from Gender-Based Violence against Women and Domestic Violence, working draft, 2026.

³³ National Network to End Violence against Women and Domestic Violence, Contribution to the 2026 Country Report of the European Commission for North Macedonia, April 2026, section on prevention and combating gender-based violence, not public shared with google drive [link](#).

Recommendation: The authorities should ensure that the new strategic framework is accompanied by adequately funded, long-term and measurable primary prevention programmes addressing the gendered and structural causes of violence against women. These should include systematic measures to challenge harmful gender stereotypes and discriminatory attitudes, institutionalised programmes engaging men and boys as agents of change, and targeted prevention measures responding to the specific exposure to violence of women and girls facing intersecting forms of discrimination. Prevention programmes should include clear objectives, responsible institutions, dedicated resources and indicators capable of measuring changes in attitudes and behaviour, and their impact should be regularly evaluated in cooperation with women’s rights organisations.

Article 14 – Education

Education is a central component of long-term prevention of violence against women and girls. The thematic evaluation places particular emphasis on whether formal education addresses equality between women and men, personal integrity, mutual respect, non-violent conflict resolution and freely given consent; covers different forms of gender-based violence; integrates digital literacy and online safety; eliminates negative gender stereotypes from teaching materials; and provides tailored prevention interventions for girls exposed to intersectional discrimination.³⁴ North Macedonia has taken several relevant steps since GREVIO’s baseline evaluation. In 2024–2025, new curricula were developed for grades VII and VIII of primary education and for the first year of general secondary education, incorporating principles of equality, inclusiveness, respect for diversity, non-violent communication and social responsibility. A new Law on Textbooks in Primary and Secondary Education was adopted, followed by a new Methodology for the Evaluation of Textbooks in April 2025 incorporating criteria on equality and non-discrimination. New textbooks were developed for grade VII and the first year of general secondary education, while the preparation of new textbooks for grade VIII was initiated.³⁵ Other curricular developments are also relevant to Article 14. The authorities report that educational content now addresses mental health, emotional literacy, mutual respect, personal boundaries, digital safety and violence prevention. In cooperation with the World Health Organization, the optional subject *Learning about My Health* was revised for grades IV and V and further developed for grades VI and VII.³⁶ These are positive developments, particularly given the thematic evaluation’s stronger emphasis on personal integrity and the digital dimension of violence. However, the available information does not yet make it possible to assess how systematically the full content required by

³⁴ GREVIO, Questionnaire on legislative and other measures giving effect to the provisions of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence – 1st Thematic Evaluation Round, GREVIO/Inf(2022)31, Article 14, Question 10.

³⁵ Government of North Macedonia, Reply to GREVIO’s Questionnaire for the First Thematic Evaluation Round – Building Trust by Delivering Support, Protection and Justice, GREVIO/Inf(2026)1, Article 14, pp. 49–50.

³⁶ Ibid.

Article 14 is taught across the education system, how many pupils are reached, or whether the relevant content is compulsory or dependent on participation in optional subjects. This distinction is particularly important for freely given consent, gender-based and sexual violence and digital forms of abuse. The existence of relevant content in particular curricula or elective subjects does not necessarily ensure that all children and young people receive age-appropriate education on these issues.

Comprehensive sexuality education and continuity of prevention measures

Comprehensive sexuality education is particularly relevant in this context. GREVIO's baseline evaluation noted that the Law on Prevention of and Protection from Violence against Women and Domestic Violence introduced violence-prevention activities and sexuality education in primary and secondary schools and requires programmes promoting gender equality, non-violent conflict resolution and the elimination of gender stereotypes and harmful practices to begin as early as pre-school education. GREVIO also welcomed the development of a draft National Strategy for Comprehensive Sexuality Education 2023–2030, which envisaged CSE in grade IX, and emphasised the importance of age-appropriate, evidence-based and scientifically accurate sexuality education.³⁷ The 2026 State report indicates that activities were subsequently undertaken to sensitise teachers and parents on CSE and to train teachers to deliver the CSE programme as an optional elective subject in grade IX.³⁸ This represents progress in developing the capacity necessary for implementation, but the optional nature of the programme limits the extent to which it can guarantee that all pupils receive education on consent, personal boundaries, respectful relationships and prevention of sexual and gender-based violence. A further development occurred after the State submitted its thematic response. On 9 September 2026, the Minister of Education and Science Vesna Janevska announced the withdrawal of the programme and elective subject on comprehensive sexuality education intended for secondary-school students from the first to the fourth year and announced a “deep revision” following public reactions. The Minister confirmed that the subject was elective.³⁹ The grade IX programme referred to in the State report and the subsequently withdrawn secondary-school programme should not be conflated. Nevertheless, the latter development is directly relevant to Article 14 because it raises a broader issue of continuity and institutional sustainability of education on gender equality, consent, personal integrity, healthy relationships and prevention of sexual and gender-based violence throughout the education cycle. At the time of preparation of this report, the future content and timeframe for the revised secondary-school programme have not been clarified publicly.

Digital safety and technology-facilitated sexual violence

³⁷ GREVIO, Baseline Evaluation Report – North Macedonia, GREVIO/Inf(2023)5, paras. 99–102.

³⁸ Government of North Macedonia, Reply to GREVIO's Questionnaire, GREVIO/Inf(2026)1, Article 14, p. 49.

³⁹ On 9 September 2026, the Minister of Education and Science announced that the programme and elective CSE subject intended for secondary-school students from the first to fourth year had been withdrawn for revision following public reactions ENG [link](#).

The need for systematic education on consent, personal boundaries and digital safety has become particularly urgent in light of the first nationally representative evidence on technology-facilitated child sexual exploitation and abuse in North Macedonia. The 2026 *Disrupting Harm in North Macedonia* study, conducted through collaboration between UNICEF Innocenti, ECPAT International and INTERPOL, found that 10% of internet-using children aged 12–17 — approximately 12,000 children — had experienced technology-facilitated sexual exploitation and abuse within a single year. The study further found substantial barriers to formal reporting and calls for stronger prevention, protection and support systems.⁴⁰ More detailed harmonised findings published by UNICEF indicate that an estimated 11,727 internet-using children aged 12–17 (9.4%) experienced at least one form of technology-facilitated child sexual exploitation and abuse in the year preceding the survey. North Macedonia also recorded, among the nine countries participating in the second research round, the highest prevalence of children being threatened or blackmailed into sexual activities (4.4%) and being threatened with distribution of sexual images or videos of themselves (4.2%).⁴¹ These findings substantially strengthen the relevance of the digital-literacy component of Article 14. Digital safety education should not be limited to general internet safety, but should include age-appropriate education on consent in digital interactions, sexual coercion and blackmail, non-consensual sharing of intimate material, seeking assistance and safe reporting. The findings also support the need for a gender-sensitive approach capable of addressing the social and gender norms that can facilitate sexualisation, victim-blaming and stigma surrounding sexual violence. *Disrupting Harm* itself calls for stronger prevention and gender transformative responses.⁴²

Remaining gaps

Taken together, recent curricular reforms demonstrate meaningful progress towards incorporating equality, non-discrimination, personal boundaries, digital safety and violence prevention into education. The principal concern is therefore not the complete absence of relevant educational content, but its coverage, continuity and systematic implementation. In particular, the available evidence does not demonstrate that all pupils receive systematic, age-appropriate education covering the full range of elements required by Article 14, including freely given consent and the different forms of gender-based violence. Reliance on optional subjects creates the possibility that substantial numbers of children will complete their education without receiving structured education on these issues. This concern is particularly significant considering the evidence on technology-facilitated sexual exploitation and abuse among adolescents. The recent withdrawal of

⁴⁰ UNICEF Innocenti, ECPAT International and INTERPOL, *Disrupting Harm in North Macedonia: Key Findings*, August 2026. The research provides the first nationally representative evidence on technology-facilitated child sexual exploitation and abuse in North Macedonia. UNICEF – *Disrupting Harm in North Macedonia* ENG [link](#)

⁴¹ UNICEF, *Through Children’s Eyes: How Digital Technologies Enable Child Sexual Abuse*, 3 September 2026, North Macedonia country findings. The harmonised analysis estimates that 11,727 internet-using children aged 12–17 (9.4%) experienced at least one form of technology-facilitated child sexual exploitation and abuse in the preceding year; 4.4% reported threats or blackmail to engage in sexual activities and 4.2% threats to distribute sexual images or videos ENG [link](#).

⁴² UNICEF Innocenti, ECPAT International and INTERPOL, *Disrupting Harm in North Macedonia: Key Findings*, August 2026.

the secondary-school CSE programme for revision further reinforces the need to ensure continuity. Public consultation and review of curricula are legitimate elements of education policy, but any revised programme should preserve evidence-based content necessary for preventing gender-based and sexual violence and should be assessed against the State's obligations under the Istanbul Convention. The process should also include relevant professional expertise and organisations working on gender equality, violence against women, child protection and young people. Finally, the available information remains limited regarding tailored educational interventions for girls at risk of intersectional discrimination, although this is expressly requested in the thematic questionnaire.⁴³ General principles of inclusiveness and non-discrimination are important, but they are not a substitute for targeted prevention where particular groups of girls face additional barriers or specific risks of violence.

Recommendation: The authorities should ensure the continuous and systematic implementation of Article 14 throughout formal education, through age-appropriate and evidence-based education on equality between women and men, non-stereotyped gender roles, personal integrity, freely given consent, healthy and respectful relationships, gender-based and sexual violence, digital literacy and online safety. Core prevention content should reach all pupils and should not depend exclusively on participation in optional subjects. The revision of the comprehensive sexuality education programme should preserve evidence-based content relevant to the prevention of gender-based and sexual violence and be conducted through a transparent process involving relevant professional and civil society expertise. Considering the findings of *Disrupting Harm*, particular attention should be given to consent and sexual violence in digital environments, including sexual coercion and blackmail and the non-consensual sharing of intimate material. The authorities should also develop tailored educational interventions for girls exposed to intersecting forms of discrimination and establish mechanisms to monitor the coverage and impact of prevention education.

Article 16 – Preventive intervention and treatment programmes

The practical availability of preventive intervention and treatment programmes for perpetrators remains limited in North Macedonia. Although the legal framework provides for psychosocial treatment of perpetrators and allows referrals through the competent institutions, access to specialised treatment in practice remains geographically concentrated and constrained by limited service capacity. At present, HERA's First Family Centre is the only licensed specialised civil society service providing psychosocial treatment for perpetrators of domestic violence. The service is licensed by the Ministry of Social Policy, Demography and Youth and operates in Skopje, while perpetrators are referred to it by competent institutions from across North Macedonia. Despite effectively serving a national referral function, the service has limited human and operational capacity. This creates an evident mismatch between the geographical scope of referrals and the actual capacity and location of the specialised service.³ The concentration of specialised perpetrator

⁴³ GREVIO, Questionnaire for the First Thematic Evaluation Round, GREVIO/Inf(2022)31, Article 14, Question 10.

treatment in a single service in Skopje also raises concerns regarding equal access. Perpetrators referred from other parts of the country must access a service located outside their region, while the limited capacity of one provider restricts the possibility of responding to referrals in a timely manner. The current situation therefore does not ensure a sufficiently accessible nationwide network of specialised programmes as required for the effective implementation of Article 16. This is not a new concern. GREVIO had already identified insufficient capacity and geographical availability of perpetrator programmes in its baseline evaluation and called for their expansion and sustainable financing. The persistence of a single specialised service with national referrals indicates that this recommendation has not yet translated into an adequately decentralised system. Sustainability is equally important. Licensing establishes professional and service standards, but does not in itself guarantee adequate and predictable financing or sufficient service capacity. The wider financing problems affecting licensed non-state social-service providers are characterised by short-term financing arrangements, inadequate pricing of certain services and difficulties in maintaining sufficient human resources and continuity of service provision.² These structural financing constraints are particularly problematic where one specialised provider is expected to respond to referrals originating throughout the country. There is also insufficient publicly available information on the actual functioning of perpetrator programmes. Regular data are needed on the number of perpetrators referred to treatment, the institution making the referral, waiting periods, commencement and completion of treatment, reasons for non-completion and repeat violence following intervention. Without such information, it is difficult to assess whether referral to treatment is being used consistently and whether existing capacity corresponds to actual demand. A particularly important gap concerns perpetrators of sexual violence. The available information does not demonstrate the existence of an adequate specialised system of intervention and treatment programmes for sexual offenders, including both custodial and community-based programmes. This remains an area requiring specific development rather than being subsumed under general psychosocial treatment for perpetrators of domestic violence. Finally, the effectiveness of perpetrator programmes should be assessed not merely through attendance or compliance with an imposed measure, but through their contribution to behavioral change, prevention of repeated violence and victim safety. Treatment programmes should maintain close links with specialist services supporting women and children and should never be treated as a substitute for risk assessment, protection measures or safety planning for the victim.

Recommendation: The authorities should develop a geographically accessible and sustainably financed network of specialised perpetrator programmes, rather than relying on a single licensed specialised service in Skopje to respond to referrals from across North Macedonia. Adequate and predictable public funding should be provided to existing licensed services and additional capacity should be developed in other regions. Specialised programmes should also be available in custodial settings and for perpetrators of sexual violence. A national system for collecting data on referrals, waiting periods, participation, completion and outcomes should be established, and programme effectiveness should be regularly evaluated against behavioural change, repeat violence and victim safety.

Article 18 – General obligations and multi-agency co-operation

The adoption of the Intersectoral Cooperation Protocol for Action in Cases of Violence against Women and Domestic Violence in 2023 established a comprehensive framework for coordinated institutional action. It defines responsibilities and mechanisms for referral, information exchange, risk assessment and coordinated protection between the police, Centres for Social Work, healthcare institutions, prosecution offices, courts and specialist support services.⁴⁴ The principal challenge is therefore no longer the absence of formal rules, but their consistent implementation in individual cases. Experience from monitoring cases and direct work with women victims continues to indicate weaknesses in timely information exchange, coordination and follow-up between institutions. Different institutions may hold separate pieces of information concerning previous violence, threats, coercive behaviour, separation, economic dependency or threats involving children without these being brought together into a comprehensive assessment of the pattern and escalation of violence. This fragmentation directly affects risk assessment and safety planning. Effective protection requires the police, social protection, healthcare, prosecution and other relevant actors to act on a shared understanding of the risk, rather than treating each contact with the victim or each incident as a separate event. Where information is not exchanged promptly, repeated violence may be assessed incident by incident instead of as a continuing and escalating pattern. It can also shift the practical burden of coordination to the victim. Women may be required to repeat the history of violence to several institutions, provide information already available elsewhere and independently navigate different protection and support procedures. Such practice is incompatible with a genuinely victim-centred response and may contribute to secondary victimisation. The Protocol is intended precisely to prevent this fragmentation by ensuring continuity of protection and support.⁴⁵

Case study

The deaths of Ivana and Katja

A particularly serious case adjudicated in 2026 illustrates the potentially fatal consequences of failures in institutional communication and coordinated protection. The case concerned a prolonged and escalating pattern of physical and psychological domestic violence, including repeated assaults, threats, coercive behaviour, material and existential dependency and threats involving the victim's minor daughter. On 2 March 2026, following further physical violence and serious threats, Ivana reported the violence to the police. Later that day, she died by suicide together with her minor daughter, Katja. The perpetrator was subsequently convicted, inter alia, of the criminal offence of incitement to and assistance in suicide. The case also reveals serious

⁴⁴ Intersectoral Cooperation Protocol for Action in Cases of Violence against Women and Domestic Violence, 2023. The Protocol establishes coordinated action between the police, social work centres, healthcare institutions, prosecution, courts and specialist support organisations.MKD [link](#)

⁴⁵ Ibid.

shortcomings in the institutional response preceding the deaths. Information documented through court monitoring and witness testimony shows that the authorities had been alerted to violence on several occasions before 2 March 2026. Reports and institutional contacts concerned incidents in 2025 and early 2026, while the Centre for Social Work was formally notified only approximately one month before the deaths, despite earlier warning signs and reports indicating an escalating pattern of violence.⁴⁶ The case illustrates precisely the type of institutional fragmentation that the Intersectoral Cooperation Protocol is intended to prevent. Information concerning repeated violence, previous reports, serious threats, coercive behaviour, separation, economic dependency and threats involving a child was not brought together sufficiently early into a coordinated institutional response capable of addressing the cumulative and escalating risk. It demonstrates why violence must be understood as a continuum rather than as a series of isolated incidents. Where several institutions come into contact with the same woman at different stages, effective multi-agency cooperation requires the available information to be exchanged immediately, assessed jointly and translated into a comprehensive risk assessment and coordinated safety plan. Responsibility for connecting the different parts of the protection system cannot be left to the victim. The case is particularly relevant to Article 18 because multi-agency cooperation must operate before the risk materialises into the most serious consequences. The purpose of information exchange is not simply administrative coordination, but to enable institutions to identify patterns and escalation that may not be visible when incidents are considered separately. Recent capacity-building for multisectoral teams is a positive development. In June 2025, five trainings across all eight planning regions brought together representatives of social work centres, police, healthcare institutions and NGOs specifically to strengthen the practical skills of multisectoral teams.⁴⁷ Also Following the deaths of Ivana and Katja, certain improvements were introduced in institutional practice concerning the proposal and imposition of emergency and temporary protection measures. At the initiative of the Minister of Interior, an initial meeting was held with representatives of civil society organisations to discuss the need for legislative amendments. Subsequently, in April 2026, a working group was established to prepare amendments to the Law on Prevention and Protection from Violence against Women and Domestic Violence. The proposed amendments were submitted to the Assembly on 26 August 2026. There have also been improvements in judicial practice. The Basic Civil Court Skopje has introduced an on-duty judge responsible for deciding on proposals for protection measures, thereby enabling a more timely judicial response in urgent cases. These developments represent important steps towards addressing some of the procedural and institutional shortcomings identified in the case. Their effectiveness, however, will depend on the adoption and consistent implementation of the proposed legislative amendments and on ensuring that timely access to protection measures is

⁴⁶ National Network to End Violence against Women and Domestic Violence, court monitoring and case documentation concerning the criminal proceedings in the case of Ivana and Katja, 2026. The information concerning earlier reports and institutional contacts is based on evidence and witness testimony presented in the proceedings and should therefore be distinguished from findings of institutional responsibility by the criminal court.

⁴⁷ Government of North Macedonia, Reply to GREVIO's Questionnaire for the First Thematic Evaluation Round, 2026. Five multisectoral-team trainings were conducted across the eight planning regions in June 2025, involving 85 participants from social work centres, police, healthcare institutions and NGOs.

available throughout the country, rather than only within the jurisdiction of the Basic Civil Court Skopje. However, training and the existence of the Protocol should ultimately be measured against whether multidisciplinary cooperation functions effectively in individual cases.

The experience of the National Network therefore indicates a need to move from formal multisectoral structures towards routine case-based cooperation, including timely exchange of all relevant information, joint assessment of escalating risk, coordinated safety planning and clear responsibility for follow-up. Specialist women's organisations working directly with victims should be meaningfully included in this process where appropriate and with due regard to confidentiality and victim consent.

Recommendation: The authorities should ensure the consistent implementation of the Intersectoral Cooperation Protocol in individual cases, with particular emphasis on timely information exchange, joint risk assessment and safety planning and effective follow-up in cases of repeated or escalating violence. Relevant institutions should be required to consolidate information concerning previous incidents and institutional contacts so that violence is assessed as a continuing pattern rather than as isolated events. Clear responsibility should be established for initiating and following up multi-agency interventions, and failures in communication and coordination should be subject to review and accountability. Serious and fatal cases should be systematically reviewed through a multi-agency mechanism in order to identify institutional and systemic shortcomings and prevent similar outcomes.

Article 20 – General support services

The legal framework in North Macedonia recognises that protection from violence must extend beyond immediate safety and enable women to achieve long-term recovery and independence. Article 99 of the Law on Prevention and Protection from Violence against Women and Domestic Violence provides for reintegration measures including temporary housing, psychological counselling and mentoring, financial assistance, education and training and employment measures. It also requires competent institutions to recognise women victims of violence as a particularly vulnerable group and develop measures responding to their specific needs.⁴⁸

Despite this framework, reintegration and long-term support remain among the least developed components of the protection system. The national Reintegration Programme was finalised in September 2024, after a delay of more than three years. Its adoption was an important step, but monitoring by the National Network shows that the Programme remains largely conceptual, without sufficiently defined implementation mechanisms, timelines, responsible institutions and measurable indicators. Most importantly, no dedicated and earmarked budget has been secured for its implementation, including in the State Budget for 2026.⁴⁹

⁴⁸ Law on Prevention and Protection from Violence against Women and Domestic Violence, Article 99. The provision covers temporary housing, psychological counselling with mentoring, financial assistance, education/training and employment measures MKD [link](#).

⁴⁹ National Network to End Violence against Women and Domestic Violence, Input for the Country Report – North Macedonia 2026, section “Reintegration and Long-Term Support for Women Victims of Violence September 2024 adoption, implementation deficiencies, lack of 2026 earmarked budget, housing, economic empowerment and intersectoral coordination are all directly documented there MKD [link](#).”

The result is a significant gap between the reintegration measures guaranteed by law and the support women can actually access after leaving violence. Sustainable recovery requires more than emergency protection: women may simultaneously need safe housing, adequate income, employment, childcare, healthcare and continued psychosocial support. Without an operational and adequately financed pathway connecting these measures, the formal recognition of reintegration does not translate into the material conditions necessary for independent living.

Housing and independent living

The lack of transitional and long-term housing is one of the most serious gaps. Shelter accommodation is necessarily temporary and cannot substitute for a sustainable housing solution. National Network monitoring shows that, after leaving shelters, women may have no viable option for safe accommodation and may face housing insecurity or return to a violent environment. Women victims of violence are also not explicitly recognised as a priority group within national and local housing policies, limiting their access to social and subsidised housing.⁵⁰

Housing is particularly important in the context of women's unequal access to property. Available data cited in recent civil society monitoring show that, as of 2023, only 29% of registered property owners were women, compared with 71% men, which may significantly limit women's options for securing independent accommodation when leaving violence.⁵¹

Economic independence

Economic dependency similarly remains a major obstacle to leaving violence permanently. Although Article 99 envisages financial assistance, education, training and employment measures, there is no comprehensive and structured system specifically ensuring access to employment, vocational training, income support and financial assistance tailored to women victims of violence.⁵² The problem is therefore not merely whether women victims are formally eligible for general employment or social-protection measures. What matters is whether these measures are accessible in practice and sufficiently tailored to enable women to establish and maintain an independent life. This requires systematic referral to employment and vocational programmes, adequate financial support and measures addressing practical barriers such as childcare and housing.

Fragmented reintegration pathways

A further structural weakness is the lack of an integrated pathway between the different services necessary for reintegration. Social protection, employment, housing, healthcare and education remain insufficiently coordinated. National Network monitoring identifies limited cooperation between these sectors, resulting in fragmented support pathways.⁵³

This fragmentation can substantially undermine otherwise available measures. A woman leaving violence may require housing, income support, employment assistance, childcare and healthcare

⁵⁰ Ibid.

⁵¹ The Advocates for Human Rights, National Network to End Violence against Women and Domestic Violence et al., Shadow Report to the UN Human Rights Committee, 2025, section V, para. 80, citing administrative data from the Agency for Real Estate Cadastre EN [link](#).

⁵² National Network, Input for the Country Report – North Macedonia 2026, section “Reintegration and Long-Term Support for Women Victims of Violence”.

⁵³ Ibid.

at the same time. Where each measure requires a separate procedure and there is no coordinated reintegration plan, the responsibility for navigating the system is effectively transferred to the woman herself. The central concern under Article 20 is therefore not the absence of legal recognition of reintegration, but the failure to operationalise it as a funded and coordinated continuum from emergency protection to long-term recovery. The effectiveness of the system should ultimately be assessed through outcomes: whether women obtain stable housing, adequate income and financial support, employment or training and access to necessary general services, and whether these measures enable them and their children to remain safely independent from the perpetrator.

Recommendation: The authorities should ensure the full implementation of the Reintegration Programme through clearly defined institutional responsibilities, timelines, measurable indicators and dedicated and sustainable budget allocations. Particular priority should be given to establishing transitional and long-term housing and recognising women victims of violence as a priority group in social and affordable housing policies. Reintegration should include tailored access to employment and vocational training, adequate financial and income support, childcare, healthcare and other measures necessary for independent living. A coordinated pathway should connect social protection, employment, housing, healthcare and education services, supported by individualised case management where necessary. Data should be systematically collected on access to and outcomes of reintegration measures in order to assess whether women victims of violence are achieving long-term safety and economic independence.

Article 22 – Specialist support services

North Macedonia has expanded parts of the specialist support system in recent years, including through the establishment and licensing of additional services provided by women’s civil society organisations. Nevertheless, the existing services still do not constitute a comprehensive, adequately funded and geographically accessible national network capable of providing specialist support to all women victims of the forms of violence covered by the Istanbul Convention.

This assessment is supported not only by civil society monitoring but also by the State Audit Office (SAO). Its 2025 performance audit, specifically focused on the implementation of the Istanbul Convention and specialist services for women victims of gender-based and domestic violence, concluded that the measures and activities undertaken by the competent institutions were not sufficiently effective to ensure prevention, support, protection and full reintegration of women victims. The auditors further found that the number and geographical distribution of functional specialist centres were insufficient and that some services did not meet the prescribed requirements concerning location, equipment, premises and staffing.⁵⁴ The National Network’s 2026 costing study, *At What Cost? – Costs of Specialist Services for Gender-Based Violence in North Macedonia*, confirms that significant disparities remain in the availability and capacity of specialist

⁵⁴ State Audit Office, Final Performance Audit Report, June 2025, findings on the effectiveness, geographical distribution and compliance of specialist services.

services. Counselling, shelter accommodation, SOS support, psychosocial assistance and legal support remain unevenly distributed, while the sustainability of many services continues to depend on insufficient or short-term financing.⁵⁵ The study also shows that women's civil society organisations continue to carry a substantial share of responsibility for specialist service provision, including in areas where they are the only available providers.

Availability and geographical coverage

The availability of specialist services varies considerably across the country. Women living outside larger urban centres may have to travel to another municipality or region to obtain specialist assistance, creating additional barriers related to distance, transportation costs and timely access. The establishment of individual new services in previously underserved regions is therefore important, but the number of formally established services cannot in itself be used as a measure of adequate territorial coverage. The State Audit Office confirms this structural problem. Its audit found that the number and territorial distribution of functional specialist centres remain insufficient, while some existing centres do not fulfil the prescribed requirements concerning premises, equipment, location and human resources.⁵⁶ This distinction between a formally established service and a genuinely functional and accessible service is essential when assessing compliance with Article 22. The National Network's 2026 costing analysis further demonstrates the scale of the remaining gap in shelter accommodation. Its assessment indicates that an additional 377 shelter places would be required to meet the applicable minimum international standard.⁵⁷ This shortage cannot be addressed solely through the formal establishment or licensing of providers; it requires adequate infrastructure, qualified staff and sustainable financing based on actual service needs. The specialist service system also remains considerably more developed for domestic violence than for other forms of violence against women. Specialist support appropriate to the specific needs arising from stalking, sexual harassment, technology-facilitated violence and other forms of violence covered by the Convention remains insufficiently developed. The development of the legal framework concerning newer manifestations of violence, including technology-facilitated forms, therefore needs to be accompanied by corresponding specialist expertise and services capable of addressing their particular safety, psychological, legal and digital consequences.

Women's civil society organisations as specialist service providers

Women's civil society organisations remain an indispensable part of the specialist support system. They provide counselling, psychosocial and legal support, shelter and crisis assistance and SOS services, and have developed specialist expertise through long-term direct work with women victims of violence. The Executive Office of the National Network directly manages Women's Support Centres and specialist counselling services in Skopje, Tetovo and Bitola. The Skopje Women's Support Centre is currently licensed as a specialised service provider, while licensing procedures for the services in Tetovo and Bitola are ongoing. During 2024–2025, these services

⁵⁵ National Network, *At What Cost?*, 2026, Executive Summary and analysis of specialist services.

⁵⁶ State Audit Office, *Final Performance Audit Report*, June 2025, findings on the territorial distribution and compliance of specialist centres.

⁵⁷ National Network, *At What Cost?*, 2026, analysis of shelter capacity and estimated additional capacity.

supported 531 women and 190 children, providing specialised legal assistance, psychosocial counselling, social-work support and career counselling aimed at strengthening women's safety, access to justice and longer-term autonomy. During the same period, 108 women received free legal aid, including legal assistance and court representation, while 84 women victims of gender-based and domestic violence received career counselling. The women supported included women from different ethnic communities, including 406 Macedonian, 76 Albanian and 40 Roma women, illustrating both the continuing demand for specialist support and the importance of locally accessible and culturally and linguistically responsive services.⁵⁸ These figures should not be understood merely as organisational outputs. They illustrate the extent to which women's rights organisations form part of the practical infrastructure of specialist support for victims of violence. Where such services depend on project-based or short-term financing, the sustainability risk therefore affects not only the organisations providing them, but also the continuity and accessibility of specialist support available to women and children. This further reinforces the need for predictable and sustainable public financing of women's specialist services as an integral part of the national system of protection and support. The 2026 *At What Cost?* study similarly demonstrates that women's organisations continue to carry a disproportionately large share of responsibility for specialist service provision, including in regions where civil society organisations are the only available providers of certain types of specialist support.⁵⁹ Their role should therefore not be treated as temporary or supplementary to the public system. Specialist women's organisations form part of the infrastructure through which the State fulfils its obligations under the Istanbul Convention, and their sustainability should be treated accordingly. This makes the relationship between licensing and financing particularly important.

Licensing does not ensure sustainability

The expansion of licensing of non-state social-service providers is an important step towards institutional recognition of women's organisations as part of the service system. However, a licence confirms that a provider is authorised to deliver a service; it does not guarantee that the provider has the financial resources necessary to deliver that service continuously and at the required quality. Changes introduced in 2024 established standardised tariffs for certain specialist services. These tariffs represent amounts reimbursed by the Ministry for Social Policy, Demography and Youth for services provided under concluded contracts. Civil society monitoring, however, shows that the reimbursement model can impose substantial financial burdens on organisations with little or no core funding, as providers may first have to cover salaries, rent and other operational costs themselves and subsequently wait for reimbursement.⁶⁰ The National Network's *At What Cost?* study provides a detailed costing analysis demonstrating that the real

⁵⁸ National Network to End Violence against Women and Domestic Violence, administrative service data from the Women's Support Centres and specialist counselling services in Skopje, Tetovo and Bitola, 2024–2025. During the reporting period, 531 women and 190 children received support; 108 women received free legal aid, including court representation; and 84 women received career counselling.

⁵⁹ National Network, *At What Cost?*, 2026, analysis of the role of women's civil society organisations in specialist service provision.

⁶⁰ The Advocates for Human Rights, National Network to End Violence against Women and Domestic Violence et al., *Shadow Report on North Macedonia, 2025/2026*, paras. 59–60, concerning the 2024 financing reform, standardised tariffs and reimbursement model for licensed specialist GBV services.

cost of specialist services extends well beyond direct contact with an individual beneficiary. Actual service delivery requires qualified personnel, premises, rent and utilities, specialist counselling, equipment and other operational expenditure necessary to ensure continuity and quality.⁶¹

For this reason, the study specifically recommends revision of the existing methodology for calculating the costs of specialist services so that it reflects the real operational needs of licensed social-service providers and ensures their financial sustainability.⁶² The appropriate measure of institutionalisation is therefore not simply how many organisations have obtained licences, but whether the public financing available after licensing allows them to retain qualified staff, maintain adequate premises and equipment and provide the required service continuously and in accordance with specialist quality standards. The broader financing framework also lacks sufficient transparency and predictability. The *At What Cost?* study finds that specialist gender-based violence services are not systematically identifiable through separate and traceable budget lines. Relevant expenditure is instead largely embedded within broader social-protection allocations, making it difficult to identify, monitor and assess the adequacy of public spending on individual specialist services. The study therefore recommends separate budget lines for each type of specialist service, multiannual financing arrangements with civil society providers and systematic use of realistic unit-cost methodologies in annual and medium-term budget planning.⁶³ The State Audit Office findings reinforce the concern about the relationship between financing and quality. In examining contracts for programme activities related to domestic violence during 2018–2023, the auditors found that although the Ministry was required to exercise control over beneficiaries in the implementation of funded services, such control had not been carried out, creating a risk that allocated resources did not result in the provision of specialist services of the required quality.⁶⁴ Accordingly, licensing should be understood as an important step towards institutionalisation rather than evidence that sustainability has already been achieved. Where public financing does not correspond to the actual costs of delivering a licensed service, part of the financial responsibility and risk associated with fulfilling the State’s obligations under the Istanbul Convention remains with the civil society provider.

Accessibility for women facing intersecting discrimination

Geographical availability is closely connected to accessibility for women who face additional barriers. Women living in rural areas, Roma women, women with disabilities and other marginalised groups may experience compounded obstacles where specialist services are concentrated in larger urban centres, premises are physically inaccessible, transport is unavailable or expensive, or assistance is not available in a language they understand. The 2026 costing analysis identifies continuing gaps in emergency accommodation, round-the-clock support and

⁶¹ National Network, *At What Cost?*, 2026, methodology and Table 35, “Identification of Costs”.

⁶² *Ibid.*, Conclusions and Recommendations, recommendation concerning revision of the methodology for determining the costs of specialist services.

⁶³ *Ibid.*, Chapter 2 and Recommendations to the Ministry of Social Policy, Demography and Youth, concerning separate budget lines, multiannual financing arrangements and unit-cost methodologies.

⁶⁴ State Audit Office, Final Performance Audit Report, June 2025, findings on Ministry control over funded programme activities during 2018–2023.

specialist services adapted to women facing such barriers.⁶⁵ Targeted or donor-funded initiatives for individual groups cannot substitute for structural accessibility of the entire specialist support system. Access to essential support should not depend on a woman's place of residence or on the existence and duration of a particular project.

Quality, staffing and continuity

The existence of a formally established or licensed service also does not necessarily mean that women can obtain continuous specialist assistance of adequate quality. The *At What Cost?* analysis stresses the importance of qualified and dedicated personnel, including psychologists, social workers, legal advisers and crisis-intervention professionals, as well as appropriate standards concerning confidentiality, safety, accessibility, supervision and facilities.⁶⁶ The State Audit Office identified significant human-resource shortages within parts of the wider social-protection system. For example, in the relevant service within the Ohrid Centre for Social Work only five of ten systematised positions were filled, while shortages of coordinators, psychologists, pedagogues, lawyers and case managers were also identified in other audited Centres for Social Work.⁶⁷

These findings concern the wider institutional protection system and should not be equated with staffing levels in every specialist women's service. They nevertheless demonstrate that the availability of trained and specialised human resources remains a broader structural constraint affecting the capacity of the protection and support system. Specialist services should therefore be assessed not only by their number or licensing status, but also by their actual capacity, staffing levels, professional specialisation, working hours, physical and linguistic accessibility, continuity of support and compliance with gender-sensitive, victim-centred and trauma-informed standards.

Functionality of specialist counselling services and shelters

A particular concern is the gap between the number of specialist services formally established within the public system and the number that are actually operational and capable of providing specialist support in accordance with the applicable standards. This distinction is especially evident in relation to specialist counselling services and shelters. According to information provided by the Ministry of Social Policy, Demography and Youth to GREVIO, ten specialist counselling centres for women victims of violence and domestic violence have been established within Centres for Social Work, while the 2025 State Audit Office refers to eleven such centres. However, the National Network's 2026 *At What Cost?* analysis, drawing on the audit findings and additional information collected from service providers, concludes that only five of these counselling centres are actually operational. Based on population and geographical coverage needs, the study estimates that 19 fully operational counselling centres are required nationally, resulting in an effective deficit of 14 centres.⁶⁸ The problem is not limited to the number of services. With the exception of Skopje, the counselling services established within Centres for Social Work generally consist of a designated room within the Centre and do not have personnel exclusively assigned to the specialist

⁶⁵ National Network, *At What Cost?*, 2026, findings on geographical and other accessibility barriers.

⁶⁶ Ibid., findings concerning qualified specialist personnel and minimum operational standards for specialist services.

⁶⁷ State Audit Office, Final Performance Audit Report, June 2025, findings on staffing of Centres for Social Work.

⁶⁸ National Network, *At What Cost?*, 2026, analysis of specialist counselling centres and required national coverage; State Audit Office, Final Performance Audit Report, June 2025, pp. 36–37 and 43–44.

service. Where services are provided, they are delivered mainly by social workers and psychologists who already perform case-management functions within the Centres for Social Work, rather than by dedicated specialist multidisciplinary teams. The State Audit Office further found that, with the exception of the Skopje Centre for Social Work, intervention teams had not been established in the other audited Centres, despite relevant positions being foreseen in staffing structures.⁶⁹ The audit findings illustrate the practical consequences. In Bitola, the specialist counselling centre had been established but was not providing the service for which it had been created. In Gostivar, the counselling centre was not operational after its lease expired in December 2024. In Kumanovo, the counselling centre had been established but was not operational. In Ohrid, the counselling service operated within the premises of the Centre for Social Work in conditions that did not comply with the applicable standards. In Skopje, the counselling service for women victims of violence and the counselling programme for psychosocial treatment of perpetrators operate in the same premises at different times; the State Audit Office found that this arrangement was not in accordance with the applicable standards because of the potential risk of victims coming into contact with perpetrators.⁷⁰ At the same time, six additional specialist counselling services are operated by civil society organisations in Skopje, Bitola, Tetovo, Shtip, Kumanovo and Kavadarci.⁷¹ This further demonstrates that the actual availability of specialist counselling support depends substantially on women's civil society organisations and cannot be assessed solely on the basis of services formally established within the public social-protection system. The situation concerning shelters and temporary accommodation raises similar concerns. Formally established temporary accommodation services are distributed across several regions, but their actual functionality differs substantially. The State Audit Office found that the centre in Veles was established and operational, while the facility in Sveti Nikole was not operational because of inadequate conditions in the premises, including dampness. The centre in Ohrid was not operational after its lease expired in December 2024, despite requests by the Centre for Social Work to the Ministry concerning continuation of the lease. The facility in Bitola had been established but was not being used for accommodation of women victims of gender-based violence, while the centre in Gostivar was likewise not operational following the expiry of its lease in December 2024.⁷² In contrast, the Skopje centre was assessed as fully operational and was the only audited facility found to meet the prescribed requirements concerning location, equipment, premises and the personnel necessary for its operation. The State Audit Office concluded that, apart from the Skopje centre, the other specialised centres for victims of gender-based violence located in residential facilities did not meet the operational requirements established by the applicable Rulebook concerning location, equipment and premises.⁷³

⁶⁹ State Audit Office, Final Performance Audit Report, June 2025, pp. 43–44; National Network, *At What Cost?*, 2026, analysis of staffing and functionality of counselling services.

⁷⁰ State Audit Office, Final Performance Audit Report, June 2025, pp. 36–37; National Network, *At What Cost?*, 2026, Table 32.

⁷¹ National Network, *At What Cost?*, 2026, information on six specialist counselling services operated by civil society organisations.

⁷² State Audit Office, Final Performance Audit Report, June 2025, pp. 36–37; National Network, *At What Cost?*, 2026, analysis of shelter services.

⁷³ State Audit Office, Final Performance Audit Report, June 2025, pp. 36–37.

These findings are particularly important when interpreting official figures on the number of established specialist services. A formally established shelter or counselling centre cannot be considered effective specialist support under Article 22 if it is not operational, cannot admit or support victims, lacks dedicated specialist personnel or does not meet the prescribed standards. The relevant measure is therefore not the number of services recorded as established, but their actual functionality, capacity, accessibility and ability to provide continuous specialist support. Taken together with the estimated deficit of 377 shelter places and the estimated need for 19 fully operational specialist counselling centres, the evidence reveals a structural implementation gap: North Macedonia has developed a formal infrastructure of specialist services, but formal establishment has not consistently translated into operational and adequately resourced services accessible to women in practice. At the same time, women's civil society organisations continue to compensate for important gaps in the public system. Sustainable implementation of Article 22 therefore requires service planning and financing to be based on actual functionality, capacity and territorial needs rather than on the formal number of established facilities.

SOS helplines

SOS helplines provide a particularly clear illustration of the difference between the formal existence of a service and effective nationwide accessibility. Recent civil society monitoring identifies continuing regulatory and sustainability problems. Although standards and procedures for SOS services exist, the current social-protection framework does not provide an adequate basis for licensing SOS helplines as a distinct social service. Recent monitoring identifies several SOS lines operated by women's civil society organisations, while also pointing to the need for a genuinely nationally coordinated, continuously available 24/7 service.⁷⁴ Financing and staffing directly determine whether round-the-clock assistance can actually be provided. Civil society monitoring has documented dependence on partial public financing, project funding and voluntary work, as well as difficulties in securing sufficient trained personnel. Linguistic accessibility has also been a persistent concern, particularly for women who do not speak Macedonian.⁷⁵

These issues are also reflected in the 2026 costing analysis, which identifies limited human resources, unstable financing arrangements and difficulties in ensuring continuous and linguistically accessible support.⁷⁶ A formally existing telephone number should therefore not automatically be treated as meeting the Convention standard of a state-wide, free-of-charge and round-the-clock specialist helpline.

The authorities should ensure that women can obtain the same level of immediate specialist assistance 24 hours a day, irrespective of language, place of residence or the availability of a particular project or individual operator.

Assessment

⁷⁴ The Advocates for Human Rights, National Network et al., Shadow Report on North Macedonia, 2025/2026, paras. 61–62, concerning the regulatory status and operation of SOS helplines and the need for a nationally coordinated 24/7 service.

⁷⁵ Gender Equality Platform, Shadow Report to GREVIO on the Implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence in North Macedonia, 2022, Article 24, concerning financing, continuity and linguistic accessibility of SOS helplines EN [link](#).

⁷⁶ National Network, At What Cost?, 2026, findings on human resources, financing and continuous and linguistically accessible SOS support.

North Macedonia has made progress in establishing and licensing individual specialist services and in formally integrating civil society organisations into the social-service system. However, the central challenge under Article 22 is no longer simply the establishment of services, but whether those services together constitute a coherent, adequately resourced, geographically accessible and sustainable national specialist support system. The available evidence demonstrates continuing geographical disparities, significant differences between formally established and actually operational services, insufficient shelter and counselling capacity, insufficient specialist provision for forms of violence beyond domestic violence, barriers affecting women facing intersecting discrimination and persistent weaknesses in the financing and sustainability of specialist women's organisations. Particular attention should be paid to the distinction between licensing and sustainability. Formal recognition of a civil society organisation as a licensed provider does not ensure that the actual costs of qualified staff, premises, equipment, supervision and continuous service provision are adequately covered. The 2026 costing analysis provides a basis for moving from financing determined primarily by available allocations towards financing based on the real cost of delivering specialist services in accordance with Istanbul Convention standards.⁷⁷

Importantly, these concerns are not based solely on civil society assessment. The 2025 State Audit Office performance audit concluded that the measures and activities undertaken by competent institutions concerning specialist services were not sufficiently effective to ensure prevention, support, protection and full reintegration of women victims of gender-based and domestic violence.⁷⁸ Ultimately, compliance with Article 22 should be assessed by whether every woman can obtain timely, confidential, accessible and high-quality specialist support regardless of where she lives, the form of violence she has experienced or her individual circumstances, rather than by the formal number of services or licences issued.

Recommendation

The authorities should establish and sustainably finance a comprehensive and geographically accessible network of specialist women's support services covering all forms of violence under the Istanbul Convention. Service planning should be based on population needs, territorial coverage and the actual capacity, functionality and accessibility of existing services, rather than solely on the number of formally established or licensed providers. Existing deficits in shelter capacity and specialist services outside major urban centres should be addressed as a priority.

The authorities should ensure that specialist counselling centres and shelters recorded as established are actually operational and compliant with applicable standards. Non-functional services should be made operational through adequate premises, dedicated and appropriately trained specialist staff and sustainable financing. Planning and reporting should clearly distinguish between services that are formally established, licensed and fully operational, and should include information on their actual capacity and use.

Public financing of licensed specialist services should be based on realistic unit-cost calculations reflecting the full operational costs of service provision, including qualified personnel, premises,

⁷⁷ Ibid., Conclusions and Recommendations, recommendation to revise the methodology for determining the costs of specialist services to reflect actual operational needs.

⁷⁸ State Audit Office, Final Performance Audit Report, June 2025, overall conclusion.

utilities, equipment, supervision and continuous availability. The methodology for determining service prices should be revised accordingly. Separate and traceable budget lines should be established for different types of specialist services and predictable, preferably multiannual, financing arrangements should be introduced for specialist women's civil society organisations. The authorities should ensure adequate staffing and consistently applied minimum quality and operational standards, as well as physical, geographical and linguistic accessibility, including for Roma women, women with disabilities and women living in rural areas. A sustainably financed, state-wide, free-of-charge and genuinely 24/7 specialist helpline should be ensured. Data on the location, functionality, capacity, staffing, accessibility, financing and use of specialist services should be regularly collected and published in order to identify gaps and plan services on the basis of demonstrated needs and actual costs.

Article 25 – Support for victims of sexual violence

North Macedonia has established a formal framework for specialised support to victims of sexual violence and rape. The Law on Prevention and Protection from Violence against Women and Domestic Violence provides for sexual violence referral centres offering initial protection and support, while the Standard Operating Procedure (SOP) envisages a multisectoral response including emergency medical assistance, psychosocial support, forensic examination, healthcare services and legal and security assistance. Services under the SOP are free of charge and victims are not required to possess identification documents in order to access them.⁷⁹ Three sexual violence referral centres operate within healthcare institutions, located in Skopje, Tetovo and Kumanovo. They are intended to provide an integrated response encompassing identification and assessment, medical examination, psychological crisis intervention and referral to other necessary services.⁸⁰ The continued existence of these centres is important. However, recent civil society monitoring demonstrates a substantial gap between the comprehensive model envisaged by the legal framework and the services actually available to survivors in practice.

Limited geographical coverage and functionality

The 2026 National Network costing study *At What Cost?* finds that sexual violence referral centres continue to exist in only three locations, while its assessment estimates that at least ten centres would be required to provide adequate national coverage. The study also identifies shortcomings

⁷⁹ Law on Prevention and Protection from Violence against Women and Domestic Violence; Standard Operating Procedure for comprehensive multisectoral support in sexual violence and rape referral centres, provisions concerning initial protection, medical assistance, psychosocial support, forensic examination, healthcare, legal and security assistance and free access to services.

⁸⁰ National Network to End Violence against Women and Domestic Violence, Neda Chalovska Dimovska, Katerina Shapkova Kocavska and Elena Dimushevska, *At What Cost? Costs of Specialist Services for Gender-Based Violence in North Macedonia, 2026*, section on sexual violence referral centres, submitted to GREVIO as supporting material; CORTEX, *Analysis of the Standard Operating Procedure for Sexual Violence and Rape Referral Centres through a Victim-Centred Approach*, author Neda Chalovska Dimovska, ed. Elena Dimushevska, May 2025 MKD [link](#).

concerning equipment, round-the-clock availability, multidisciplinary staffing and forensic capacity.⁸¹ The problem is therefore not limited to geographical distribution. The existing centres do not consistently function as fully operational integrated one-stop services capable of providing the complete medical, forensic, psychological and other specialist response envisaged by the framework. The 2025 victim-centred analysis of the SOP found that multisectoral response teams had not been established, that the status of centre coordinators remained unresolved and that coordinators were not formally appointed or financially compensated for this work. It further found that procedures may take several hours and that all relevant professionals cannot always assemble within the envisaged two-hour period.⁸² These are significant operational shortcomings. The purpose of a sexual violence referral centre is precisely to prevent a survivor in crisis from having to navigate several institutions and procedures separately in order to obtain healthcare, forensic examination, psychological support and other assistance. Where the multidisciplinary response is not continuously available, the formal one-stop model does not operate as intended. The geographical deficit compounds this problem. Women living outside Skopje, Tetovo and Kumanovo do not have equivalent immediate access to a specialised centre in their own region. The applicable Convention standard envisages sufficient geographical distribution, with the Explanatory Report indicating one rape crisis or sexual violence referral centre per 200,000 inhabitants and accessibility for women in rural as well as urban areas.⁸³ The 2025 SOP analysis itself recalls this standard when assessing national coverage.

Access to services and the link with reporting

A particularly serious concern is the relationship between access to the referral centres and formal reporting of sexual violence. The 2026 *At What Cost?* study and the 2025 SOP analysis indicate that, in practice, access to the existing referral mechanism remains closely linked to reporting to the police or referral by a competent institution. Institutional referrals are infrequent and predominantly concern cases involving minors.⁸⁴ This creates a fundamental problem from the perspective of a victim-centred implementation of Article 25. Access to immediate healthcare and psychosocial support following sexual violence should not effectively depend on a survivor's willingness or readiness to initiate criminal proceedings. A survivor may require urgent healthcare, crisis intervention, information and psychological support while being unable or unwilling, particularly immediately following the assault, to decide whether to report the violence. The same

⁸¹ National Network, *At What Cost?*, 2026, Executive Summary and section on sexual violence referral centres.

⁸² CORTEX, *Analysis of the Standard Operating Procedure for Sexual Violence and Rape Referral Centres*, May 2025.

⁸³ Council of Europe, *Explanatory Report to the Convention on Preventing and Combating Violence against Women and Domestic Violence*, para. 142; see also CORTEX, *Analysis of the Standard Operating Procedure*, 2025, discussion of the standard of one rape crisis or sexual violence referral centre per 200,000 inhabitants and geographical accessibility for women in rural and urban areas.

⁸⁴ National Network, *At What Cost?*, 2026, section on sexual violence referral centres; CORTEX, *Analysis of the Standard Operating Procedure*, 2025.

distinction is essential between access to support and preservation of evidence. A woman should not have to choose immediately between entering the criminal justice process and losing the possibility of preserving forensic evidence that may later be essential if she decides to report. Civil society monitoring also indicates that the number of survivors actually reaching the referral centres remains low in comparison with the wider number of sexual violence cases identified or reported through competent institutions.⁸⁵ This raises concerns not only about geographical accessibility but also about awareness of the centres, referral practice and the extent to which women perceive the existing system as accessible and responsive. Moreover, although the SOP envisages psychosocial and legal assistance as part of an integrated response, recent monitoring indicates that the practical operation of the centres remains predominantly healthcare-oriented, rather than providing the full multidisciplinary range of support envisaged by the model.⁸⁶

Forensic examination and preservation of evidence

Forensic examination and preservation of evidence constitute one of the most significant weaknesses of the current system. The 2025 SOP analysis identifies substantial practical shortcomings in the capacity of the referral centres to collect, document and securely store forensic evidence in accordance with the envisaged procedure. Critically, where a survivor does not formally report the sexual violence, forensic evidence cannot currently be collected through the applicable procedure because an order from the public prosecutor is required. The SOP also does not establish a clear retention period for forensic evidence.⁸⁷

The existing criminal-procedure arrangements confirm the central role of the public prosecutor in the collection and securing of forensic evidence: forensic and criminalistics units act following an order of the competent prosecutor.⁸⁸ This creates a serious gap in access to justice. A survivor may not be psychologically ready to initiate criminal proceedings immediately after sexual violence. If forensic evidence cannot be collected and securely preserved independently of an immediate decision to report, potentially decisive evidence may be irretrievably lost before the survivor is able to make an informed decision concerning criminal proceedings. A victim-centred system should preserve the survivor's future access to justice rather than force an immediate decision on prosecution as the practical condition for preserving potentially crucial evidence. This approach is also consistent with the model identified in the Istanbul Convention's Explanatory Report. The 2025 SOP analysis notes as good practice that forensic examination should be possible irrespective of whether the case has already been reported to the police and that evidence should be collected and stored so that the survivor can decide at a later stage whether to report the rape or sexual

⁸⁵ Ibid.

⁸⁶ CORTEX, Analysis of the Standard Operating Procedure, May 2025, findings on multisectoral teams and coordination.

⁸⁷ CORTEX, Analysis of the Standard Operating Procedure, May 2025, findings on forensic evidence.

⁸⁸ Government of North Macedonia, Reply to GREVIO's Questionnaire for the First Thematic Evaluation Round, GREVIO/Inf(2026)1, Article 25, Question 30. The response confirms that collection and securing of forensic evidence falls under the jurisdiction of the public prosecutor and that forensic and criminalistics units act following an order issued by the competent prosecutor.

violence.⁸⁹ Accordingly, reform is required not only in terms of forensic equipment but also in the legal and procedural relationship between forensic evidence and reporting. Referral centres need the capacity, protocols and secure facilities to collect and preserve evidence with the informed consent of the survivor while respecting chain-of-custody requirements and allowing her a meaningful period in which to decide whether to pursue criminal proceedings.

Absence of long-term specialist support

A further major gap **concerns long-term counselling and psychotherapy for survivors of sexual violence and rape**. The legal and service framework envisages support extending beyond immediate crisis intervention, including individual and/or group psychotherapy, psychosocial counselling, referral to other general and specialist services, accompaniment to institutions and advocacy.⁹⁰⁰ However, the 2025 analysis found that the envisaged long-term specialist service had not been developed. The 2026 *At What Cost?* study similarly identifies the absence of structured and continuous long-term psychotherapeutic support for survivors of sexual violence.⁹¹⁹²

This is a substantial gap under Article 25. Recovery from sexual violence cannot be addressed solely through emergency medical intervention. Survivors may require specialist psychological and psychotherapeutic support for months or years after the violence, irrespective of whether they accessed a referral centre immediately after the assault or reported the violence to the authorities. The absence of long-term support also demonstrates why sexual violence referral centres and rape crisis services should not be treated as interchangeable. The existing referral centres are principally designed around immediate medical, forensic and crisis intervention, while a rape crisis model must also ensure specialist medium- and long-term trauma support and counselling. In this limited respect, the earlier GREVIO finding remains useful as a benchmark: GREVIO specifically identified the need for rape crisis centres capable of providing long-term psychological support and counselling, including many months or years after sexual violence.⁹³⁹⁴ The current independent evidence indicates that this particular service gap has still not been addressed.

Financing and sustainability

The limited functionality of the referral centres is closely connected to the absence of adequate and dedicated resources. The 2026 costing analysis identifies unresolved staffing and operational requirements and recommends that specialised sexual violence services be explicitly incorporated

⁸⁹ CORTEX, Analysis of the Standard Operating Procedure, 2025, citing the Explanatory Report to the Istanbul Convention.

⁹⁰ Law on Prevention and Protection from Violence against Women and Domestic Violence; Standard Operating Procedure for sexual violence and rape referral centres.

⁹¹ Ibid.

⁹² Ibid.

⁹³ Ibid.

⁹⁴ National Network, *At What Cost?*, 2026, section on sexual violence referral centres; CORTEX, Analysis of the Standard Operating Procedure, May 2025.

into the annual and medium-term financial planning of the Ministry of Health, including dedicated budget lines for forensic kits, personnel and equipment.⁹⁵⁹⁶ The study further identifies the need for 24/7 availability of medical and forensic services, appropriate forensic standards and secure evidence-storage and chain-of-custody procedures, free medical examinations including for uninsured survivors, and specialised training for healthcare professionals in trauma-informed and survivor-centred care.⁹⁷⁹⁸ These are not merely questions of improving service quality. Without dedicated personnel, equipment, forensic capacity and predictable financing, a formally established referral centre cannot provide the comprehensive and immediately accessible specialist response required by Article 25. Financing must therefore reflect the actual cost of maintaining a permanently operational multidisciplinary service, rather than only the costs generated when an individual survivor enters the centre. This includes trained healthcare personnel, psychological support, forensic kits, secure storage facilities, coordination and on-call arrangements necessary to guarantee immediate access.

Data and actual use of services

A further weakness is the absence of sufficiently transparent and regularly published data on the actual use of sexual violence services. Data should make it possible to determine how many women and girls access each referral centre annually, how they were referred, which services they received, whether forensic evidence was collected, whether they were referred to further psychological or legal assistance and whether follow-up support was available. This information is essential because the existence of three centres says little about their actual accessibility if the number of survivors reaching them remains very limited. Data on service utilisation should therefore be used to identify geographical, institutional and other barriers and to inform the planning of additional centres and long-term services.

Assessment

North Macedonia has established an important legal and institutional basis for responding to sexual violence, including three sexual violence referral centres and a Standard Operating Procedure providing for a multisectoral response. However, recent independent evidence demonstrates that the system remains substantially below the level of accessibility and functionality required under Article 25. The shortcomings are concrete: only three referral centres exist compared with an estimated minimum of ten required for adequate national coverage; 24/7 availability is not ensured; multidisciplinary teams are not fully operational; the status and financing of coordinators remain unresolved; forensic collection and storage capacities are inadequate; preservation of forensic

⁹⁵ Law on Prevention and Protection from Violence against Women and Domestic Violence; Standard Operating Procedure for sexual violence and rape referral centres.

⁹⁶ National Network, *At What Cost?*, 2026, Executive Summary and section on sexual violence referral centres.

⁹⁷ Law on Prevention and Protection from Violence against Women and Domestic Violence; Standard Operating Procedure for sexual violence and rape referral centres MKD [link](#).

⁹⁸ National Network, *At What Cost?*, 2026, Executive Summary and section on sexual violence referral centres.

evidence remains effectively linked to formal reporting; and the envisaged long-term counselling and psychotherapy service has not been developed.**^{99 100 101 102}

Consequently, the existence of three formally established centres should not be equated with a functioning nationwide system of specialist support for survivors of sexual violence.

The priority should now be to ensure that women can actually obtain immediate, free, confidential and trauma-informed medical, forensic and psychosocial assistance, followed where necessary by long-term specialist support, regardless of where they live and regardless of whether they are ready to report the violence to the police.

Recommendation

The authorities should establish a geographically accessible and fully operational national network of sexual violence referral and rape crisis services in accordance with Article 25 of the Istanbul Convention. The existing three referral centres should be provided with dedicated and adequately trained multidisciplinary staff, appropriately regulated and financed coordination, suitable premises and equipment, forensic kits and secure evidence-storage capacity. Medical, forensic and crisis support should be available 24 hours a day, seven days a week. Additional centres should be established on the basis of population and geographical needs in order to ensure effective national coverage. Access to healthcare, psychosocial crisis intervention and other specialist support should not be conditional upon a survivor's decision to report sexual violence to the police. Legal and operational procedures should enable forensic evidence to be collected, documented and securely stored for an appropriate period, with the survivor's informed consent and in accordance with appropriate chain-of-custody safeguards, even where she has not yet decided whether to initiate criminal proceedings. The authorities should also establish the long-term counselling and psychotherapy services already envisaged by the legal framework, including specialist trauma-informed support accessible regardless of when the sexual violence occurred. Dedicated and sustainable budget allocations should be introduced for sexual violence services, including staffing, forensic equipment, secure evidence storage and long-term psychological support. Systematic data should be collected and published on referrals, access to and use of each service and the number and characteristics of women and girls supported, while fully safeguarding victims' confidentiality.

Article 31 – Custody, visitation rights and safety

The protection of women and children in custody and visitation proceedings remains an area of serious concern in North Macedonia. Although the best interests of the child constitute the guiding principle in family-law proceedings, the current framework does not ensure that domestic violence and other forms of gender-based violence are systematically identified, assessed and given

⁹⁹ Ibid.

¹⁰⁰ CORTEX, Analysis of the Standard Operating Procedure, May 2025, findings on multisectoral teams and coordination.

¹⁰¹ CORTEX, Analysis of the Standard Operating Procedure, May 2025, findings on forensic evidence.

¹⁰² CORTEX, Analysis of the Standard Operating Procedure, May 2025; National Network, At What Cost?, 2026.

appropriate weight before decisions on custody and visitation are made. Recent research and civil society monitoring indicate that this gap has practical consequences for the safety of both women and children. The Family Law does not explicitly establish domestic violence or other forms of gender-based violence as a mandatory criterion when deciding on custody or visitation rights. In divorce proceedings involving minor children, courts obtain an expert opinion from the competent Social Work Centre (SWC), while decisions concerning children born outside marriage fall within the competence of the SWCs.¹⁰³ Recent information obtained from basic courts confirms substantial differences in practice: seven of ten responding courts indicated that domestic violence may be considered through SWC reports and opinions, particularly where protection measures or other evidence exist, while two courts indicated that violence does not necessarily have to be taken into account, including in assessments of parental capacity. Only one court stated unequivocally that violence must be considered.¹⁰⁴ This variation points to a broader structural problem: the family-law system does not yet ensure violence-informed decision-making in which the safety of the woman and child is consistently assessed before parental rights and contact arrangements are determined. Whether violence is identified and how much weight it receives may therefore depend on the practice of the individual court, SWC or professional involved.

Domestic violence, post-separation abuse and the best interests of the child

Research conducted by the National Network in 2024 on shared parenting and the best interests of the child highlights the particular risks that arise when custody and contact are considered without adequately examining domestic violence. The research emphasises that separation does not necessarily end violence and that parenting arrangements may become a means through which an abusive former partner continues control over the woman. It identifies the use of children, custody and contact arrangements as potential instruments for continuing pressure, manipulation and post-separation abuse.¹⁰⁵ This is particularly important because custody disputes involving domestic violence cannot safely be approached as conflicts between two parents in an equal position. Domestic violence is characterised by an unequal relationship of power and control, which may continue or intensify after separation. Maintaining contact with the child may provide the perpetrator with continued access to the victim, while threats concerning the children, custody proceedings and contact arrangements may themselves become part of the pattern of abuse.

The National Network's research therefore cautions against treating shared parenting as a default assumption in cases involving violence. It concludes that shared parenting should not be imposed in cases of domestic or gender-based violence and that, while a risk to the mother and/or child

¹⁰³ Government of North Macedonia, Reply to GREVIO's Questionnaire, GREVIO/Inf(2026)1, Article 31, Question 32.

¹⁰⁴ Ibid.

¹⁰⁵ National Network to End Violence against Women and Domestic Violence, Natasha Petkovska, The Balance between "Shared Parenting" and the Best Interests of the Child, September 2024. The research analyses shared parenting in the context of domestic violence, the best interests of the child and the risk that parental arrangements may facilitate continuing control and post-separation abuse. The study combines analysis of domestic and international legal sources, policies and literature with qualitative and comparative analysis and interviews with civil society organisations EN [link](#).

persists, contact with the perpetrator should be restricted or, where necessary for safety, not permitted. It further stresses that children should not be compelled to maintain contact without examining the reasons for their refusal and that their protection needs should take precedence over an abstract presumption that contact with both parents is necessarily beneficial.¹⁰⁶ These considerations are particularly relevant to any future reform introducing or expanding shared parenting in North Macedonia. Shared parenting should not operate as a legal presumption that a victim must rebut by proving violence or demonstrating that contact is harmful to the child. The existence and impact of violence must instead be actively examined by the competent authorities before custody and visitation arrangements are determined.

Evidence from practice

Civil society evidence demonstrates that these concerns are not merely theoretical. The National Network's 2024 research identifies cases from domestic practice in which decisions concerning children failed to give sufficient weight to a history of violence. These include a case in which custody was awarded to the father on the basis of his stronger financial position despite his history as a perpetrator of violence, and another in which an SWC referred a woman and her ten-year-old child to counselling aimed at improving the child's relationship with the father even though the father had been criminally convicted of violence against the child.¹⁰⁷ More recent civil society monitoring similarly documents cases in which contact between children and fathers with a history of violence was ordered despite protection measures concerning the mother. It further indicates that proceedings involving violence may be approached as "family disputes" or "high-conflict separations", while women raising concerns about the safety of their children may be characterised as "uncooperative mothers".¹⁰⁸ These examples demonstrate the risk of separating the assessment of parental rights from the broader history and dynamics of violence. A perpetrator may appear capable of exercising parental responsibilities when assessed in isolation while simultaneously using parental rights and contact arrangements to maintain control over the woman or expose the child to further harm. Assessment of parental capacity should therefore never substitute for assessment of domestic-violence risk.

Children witnessing domestic violence

A further concern is that the legal framework does not expressly require decision-makers to recognise the harm suffered by children who witness domestic violence between their parents.

¹⁰⁶ National Network, The Balance between "Shared Parenting" and the Best Interests of the Child, 2024, pp. 22–23.

¹⁰⁷ National Network, The Balance between "Shared Parenting" and the Best Interests of the Child, 2024.

¹⁰⁸ The Advocates for Human Rights, National Network to End Violence against Women and Domestic Violence and partner organisations, Shadow Report on North Macedonia, 2025/2026, paras. 74–76, documenting concerns regarding contact with violent fathers despite protection measures, treatment of violence as parental conflict or "high-conflict separation", and characterisation of survivors as "uncooperative mothers".

Information obtained from the courts shows that none identified an explicit legal obligation to recognise such harm in custody and visitation proceedings. Six courts indicated that exposure to violence may instead be considered indirectly through the SWC's assessment of the best interests of the child.¹⁰⁹ This is insufficient to guarantee a consistent approach. A child who witnesses violence against his or her mother is not merely an observer of an adult dispute. Exposure to domestic violence may have significant consequences for the child's safety and well-being and must therefore form part of the assessment of custody and contact arrangements. The National Network's research specifically recommends that violence by one parent against the other be expressly considered in custody proceedings where the child has witnessed that violence. It further calls for the best interests of the child to be assessed individually and continuously, including the child's views, personal and family history, family environment, relationships, risks, well-being and protection needs.¹¹⁰ The best interests of the child and the safety of the non-violent parent should consequently not be treated as competing interests. In cases of domestic violence, protecting the child requires appropriate consideration of the safety of the parent who has experienced the violence.

Absence of systematic screening

One of the most significant weaknesses is the absence of mandatory and systematic screening for domestic violence in custody and visitation proceedings. None of the courts responding to the thematic evaluation reported conducting mandatory systematic ex officio screening of the history of domestic violence in all custody and visitation proceedings. Eight courts indicated that information is primarily obtained through evidence submitted by the parties and SWC reports. Moreover, courts in Skopje, Kavadarci and Kichevo reported that parental agreements may be approved without a detailed examination of previous violence.¹¹¹

This approach is problematic because domestic violence may never have resulted in a criminal conviction, protection order or previous formal report. Psychological violence, coercive control and post-separation abuse may be particularly difficult to identify where authorities focus predominantly on formally documented incidents.

The National Network's research highlights precisely this risk in the context of shared parenting: placing the burden on the parent opposing such an arrangement may effectively require women victims to prove both that violence occurred and that it is harmful to the child.¹¹² The responsibility for identifying violence should not rest primarily on the victim. Before custody or visitation arrangements are approved, competent authorities should actively establish whether there is a current or previous history of domestic violence, including physical and psychological violence,

¹⁰⁹ Government of North Macedonia, Reply to GREVIO's Questionnaire, GREVIO/Inf(2026)1, Article 31, Question 32.

¹¹⁰ National Network, The Balance between "Shared Parenting" and the Best Interests of the Child, 2024, Recommendations.

¹¹¹ Government of North Macedonia, Reply to GREVIO's Questionnaire, GREVIO/Inf(2026)1, Article 31, Question 32(d)–(e).

¹¹² National Network, The Balance between "Shared Parenting" and the Best Interests of the Child, 2024.

coercive control, threats, stalking and post-separation abuse, as well as violence experienced or witnessed by the child. This safeguard is equally important where the parents submit an agreement. The existence of an agreement cannot in itself be treated as evidence of the absence of violence or coercion, since such agreements may be negotiated within an unequal relationship characterised by fear, dependency or continuing control.

Risk assessment and information exchange

The absence of systematic screening is compounded by the lack of a unified violence-sensitive risk-assessment methodology for custody and visitation proceedings. Four courts reported that judges assess risk independently without a mandatory request for a formal risk assessment by the Ministry of Interior or another competent authority. None of the responding courts reported the use of a unified risk-assessment methodology in custody and visitation cases.¹¹³ Relevant information may already exist within different parts of the institutional system, including previous police reports, SWC records, criminal proceedings, protection measures, threats, breaches of protection measures and previous assessments of risk. There is no guarantee that this complete history will systematically reach the court or other authority deciding custody and visitation. The National Network's 2024 research specifically recommends the establishment of risk-assessment and risk-management procedures for custody and visitation decisions, including the mandatory use of appropriate risk markers, in order to determine when parental rights or contact should be restricted to protect the mother and safeguard the best interests of the child. It also recommends stronger cooperation among the relevant institutions and specialist women's support services.¹¹⁴

The system therefore requires a structured connection between screening, institutional information exchange, risk assessment, risk management and the final custody or visitation decision. Identification of violence must have practical consequences for whether contact is permitted and under what conditions.

Restriction of parental rights and protection after violence has been established

A criminal conviction for domestic violence or the imposition of a protection measure does not automatically result in suspension or restriction of parental rights. Recent civil society legal analysis indicates that a woman seeking such a restriction may consequently have to initiate a separate family-law procedure.¹¹⁵ An automatic termination of parental rights following every incident of domestic violence would not necessarily be appropriate, since decisions must take account of the individual circumstances and the rights and safety of the child. The concern is

¹¹³ Government of North Macedonia, Reply to GREVIO's Questionnaire, GREVIO/Inf(2026)1, Article 31, Question 32(d)–(e).

¹¹⁴ National Network, The Balance between "Shared Parenting" and the Best Interests of the Child, 2024, Recommendations, pp. 22–23.

¹¹⁵ The Advocates for Human Rights, National Network to End Violence against Women and Domestic Violence and partner organisations, Shadow Report on North Macedonia, 2025/2026, paras. 69–70, concerning the restriction or deprivation of parental rights following domestic violence and the requirement for separate family-law proceedings under the existing framework.

different: a documented finding of domestic violence does not automatically trigger a structured reassessment of whether existing custody and visitation arrangements remain safe. This may place an additional procedural burden on the woman even after violence has already been established by another competent authority. At minimum, a criminal conviction for domestic violence, a protection measure or other serious information indicating risk should trigger an immediate assessment of existing custody and visitation arrangements and consideration of whether contact should be restricted, suspended or subject to appropriate safeguards.

“Parental alienation” and analogous concepts

Particular caution is required regarding the use of *“parental alienation”* and analogous concepts in cases involving allegations or a history of domestic violence. The National Network’s research examines the concern that such concepts may be invoked against mothers who resist contact between their children and abusive fathers. It notes that the concept lacks generally accepted scientific and empirical recognition and identifies risks including shifting the burden of proof onto women, prolonging proceedings and further traumatising children.¹¹⁶⁰ More recent civil society monitoring likewise indicates that professionals may fail to distinguish between resistance to contact arising from violence, trauma or fear and alleged parental alienation, while women opposing unsafe contact may be characterised as obstructive or “uncooperative”.¹¹⁷

This problem becomes particularly serious when combined with the absence of systematic domestic-violence screening. If the history and dynamics of violence have not first been properly identified, a woman’s or child’s resistance to contact may be interpreted as a problem in their behaviour rather than as a possible response to violence and risk. The relevant safeguard is therefore not simply terminological. Allegations of alienation, obstruction of contact or lack of parental cooperation must never replace or precede a proper examination of domestic violence, coercive control, post-separation abuse, the child’s experiences and the safety concerns raised by the non-violent parent. Professional guidance should expressly prevent the use of non-evidence-based concepts to minimise or disregard allegations of violence.

Professional capacity

The effectiveness of these safeguards also depends on the professionals applying them. Information collected from courts indicates that the Academy for Judges and Public Prosecutors represents the principal systematic mechanism for judicial training. However, four responding courts themselves identified the need for more in-depth training on the dynamics of domestic and intimate partner violence and on the psychological consequences for children who witness violence.¹¹⁸¹¹⁹ Training should enable judges, SWC professionals and court-appointed experts to

¹¹⁶ Government of North Macedonia, Reply to GREVIO’s Questionnaire, GREVIO/Inf(2026)1, Article 31, Question 32.

¹¹⁷ The Advocates for Human Rights, National Network et al., Shadow Report on North Macedonia, 2025/2026, paras. 74–76.

¹¹⁸ Government of North Macedonia, Reply to GREVIO’s Questionnaire, GREVIO/Inf(2026)1, Article 31, Question 32.

¹¹⁹ Ibid.

distinguish an ordinary parental conflict from a relationship characterised by violence and coercive control. It should address post-separation violence, the use of children to continue abuse, the effects of trauma, children witnessing violence and the significance of previous protection measures, criminal proceedings and other risk indicators. The National Network's research also recommends stronger multidisciplinary expertise in custody proceedings and points to the value of specialist input from professionals such as psychologists, pedagogues and other relevant experts.¹²⁰

Assessment

The central problem under Article 31 is therefore not simply the absence of domestic violence from custody and visitation proceedings, but the absence of a mandatory, systematic and violence-informed framework governing how it must be identified, assessed and acted upon. Current practice does not guarantee systematic ex officio screening for domestic violence; there is no unified risk-assessment methodology for custody and visitation proceedings; children's exposure to domestic violence is not expressly established as a mandatory safety consideration; parental agreements may be approved without detailed examination of previous violence; and relevant information held by different institutions is not guaranteed to reach the authority deciding custody or contact. Independent civil society evidence demonstrates the practical consequences. Cases have been documented in which contact with violent fathers continued despite protection concerns, violence was insufficiently reflected in decisions concerning children, and women raising safety concerns risked being treated as obstructive or uncooperative. The 2024 National Network research adds an important dimension: parenting arrangements themselves may become a means of continuing post-separation violence and coercive control. Accordingly, preserving contact between the child and both parents cannot be treated as an objective that automatically prevails over the safety of the child and the non-violent parent. The family-law system should instead begin from a clear Article 31 standard: before custody and visitation are determined, authorities must identify any history of violence, obtain relevant institutional information, assess present and future risk and ensure that the exercise of parental rights does not jeopardise the rights and safety of either the child or the victim of violence.

Recommendation

The authorities should amend the family-law framework to explicitly require all incidents and patterns of domestic violence and other relevant forms of violence against women, including psychological violence, coercive control and post-separation violence, to be taken into account in all decisions concerning custody and visitation. The framework should expressly recognise the harm caused to children by witnessing domestic violence and require their safety and protection needs to form part of the best-interests assessment. Any future regulation of shared parenting

¹²⁰ National Network, The Balance between "Shared Parenting" and the Best Interests of the Child, 2024, Recommendations, pp. 22–23.

should clearly exclude its application as a presumption or default arrangement in cases involving domestic or gender-based violence. Mandatory and systematic screening for domestic violence should be introduced in all custody and visitation proceedings, including where parents have reached an agreement. A standardised violence-sensitive risk-assessment and risk-management methodology should be developed, together with procedures ensuring timely exchange of relevant information between SWCs, police, prosecution services, criminal and civil courts and specialist women's support services. A finding of domestic violence, a protection measure or other serious risk indicator should trigger an immediate review of the safety of existing custody and contact arrangements. Contact should be restricted, suspended or appropriately supervised whenever necessary to protect the woman and child. Judges, SWC professionals, court-appointed experts and other professionals involved in custody and visitation proceedings should receive systematic specialised training on domestic and intimate partner violence, coercive control, post-separation violence, child trauma and the use of parental rights and children as a means of continuing abuse. Clear professional guidance should be adopted concerning "parental alienation" and analogous concepts, ensuring that allegations of alienation, obstruction of contact or parental non-cooperation are never used to disregard or minimise allegations of violence and are not assessed before the existence, history and impact of domestic violence have been properly examined.

Article 51 – Risk assessment and risk management

North Macedonia has established standardised procedures for risk assessment in cases of violence against women and domestic violence. Police use standardised risk-assessment tools following a report or incident to assess the seriousness of the situation, the risk of repeated violence and potential lethality. Relevant indicators include previous violence, threats, access to or possession of weapons, coercive and controlling behaviour and other circumstances indicating increased risk. Police are also expected to coordinate with social services, with the identified level of risk informing subsequent protection measures and safety planning.¹²¹ These mechanisms provide an important formal basis for the implementation of Article 51. However, the principal challenge is whether risk assessment functions as a dynamic and multi-agency process and whether identified risks are consistently translated into effective risk management and protection when violence is repeated or escalating. A risk-assessment form completed following an individual incident cannot in itself prevent serious or lethal violence. Effective implementation requires risk to be reassessed whenever circumstances change, including following repeated reports, escalation of violence, threats to kill, stalking, separation, breaches of protection measures or other developments indicating an increased danger to the victim. Each new incident must be assessed against the complete history of violence and previous institutional interventions, rather than treated as an isolated event.

¹²¹ Government of North Macedonia, Reply to GREVIO's Questionnaire, GREVIO/Inf(2026)1, Article 51, Questions 48–49, pp. 82–84.

Persistent weaknesses in assessing escalation and repeated violence

Recent official information itself points to important weaknesses in this respect. Retrospective consideration of serious and fatal cases has identified shortcomings concerning the assessment of repetition and escalation of violence, exchange of information between institutions, use and monitoring of emergency and temporary protection measures, integration of information concerning previous reports and proceedings involving the same perpetrator, and standardisation and analytical use of available data.¹²² These findings are particularly relevant to Article 51 because they demonstrate that the existence of a standardised assessment instrument does not necessarily ensure that risk accumulated over time is recognised institutionally and translated into an escalating protection response. Where a perpetrator has previously been reported, threatened the victim, breached protection measures or been subject to criminal, misdemeanour or other proceedings, that information should form part of every subsequent assessment. This is particularly important in cases involving separation or attempted separation, threats to kill the woman or her children, stalking, access to weapons, sexual violence, coercive control and previous escalation in the severity or frequency of violence. The effectiveness of risk assessment therefore depends not only on the quality of the instrument used by an individual institution, but also on whether relevant information follows the case across institutions and reaches the professionals responsible for deciding on protection measures.

Case study

The killing of Rosica K. in Veles

The killing of 31-year-old Rosica Kocева and her father in Veles on 15 September 2025 provides a particularly serious illustration of the importance of connecting repeated reports and previous institutional interventions with dynamic risk assessment and effective risk management. According to the Ministry of Interior, Rosica was attacked with a sharp object by her former partner and subsequently died from her injuries. Her father was also found dead in his home with injuries caused by a sharp object, while the suspected perpetrator was later found injured and subsequently died.¹²³ The significance of the case for Article 51 lies particularly in the institutional history preceding the killing. Following the case, the Department for Internal Control, Criminal Investigations and Professional Standards of the Ministry of Interior conducted a detailed review of the handling by SIA Veles of all incidents previously reported by Rosica K.¹²⁴ The review found that, although police had acted in accordance with the applicable procedures in the majority of the reported cases and one criminal complaint had resulted in a suspended sentence, in some of

¹²² Government of North Macedonia, Reply to GREVIO's Questionnaire, GREVIO/Inf(2026)1, Article 51, Question 50, pp. 84–85.

¹²³ Ministry of Interior of the Republic of North Macedonia, Excerpt from daily events, 16 September 2025, concerning the events in Veles on 15 September 2025. The official bulletin records the death of Rosica Kocева, aged 31, following an attack with a sharp object by her former partner, as well as the death of her father.

¹²⁴ Ministry of Interior of the Republic of North Macedonia, Department for Internal Control, Criminal Investigations and Professional Standards, Review of the conduct of police officers of SIA Veles, 26 September 2025. The Ministry reported that all incidents previously reported by Rosica Kocева had been reviewed; shortcomings in compliance with applicable obligations and procedures were identified in the handling of some previous reports; disciplinary proceedings were proposed against 11 employees of SIA Veles; and the findings were submitted to the competent Public Prosecutor's Office.

Koceva's previous reports police officers had not fully acted in accordance with the applicable legal obligations and procedures. The Ministry proposed disciplinary proceedings against 11 employees of SIA Veles, while the findings of the internal investigation were also submitted to the competent Public Prosecutor's Office for further action.¹²⁵ This official finding is important because it confirms that shortcomings occurred in the institutional response preceding the killing. From the perspective of Article 51, however, the case also raises a broader systemic question: whether repeated reports and previous institutional interventions concerning the same perpetrator are brought together in a manner that enables authorities to recognise escalation and adjust the level of protection accordingly. The case illustrates why risk assessment must operate as a continuing process rather than a one-off procedural exercise. A previous assessment cannot remain static when new incidents occur. Each repeated report, serious threat, breach of a protection measure, escalation of controlling behaviour or other significant development should trigger reassessment on the basis of the complete history of the case. It also illustrates the essential distinction between risk assessment and risk management. Identifying risk factors has limited preventive value if the protective response does not change when the level of danger increases.

Information exchange and cumulative assessment of risk

Effective risk management requires authorities to have access to the information necessary to understand the cumulative pattern of violence. Relevant information may be dispersed across police records, Social Work Centres, prosecution offices, criminal and misdemeanour proceedings, court decisions and protection measures. If each institution sees only the individual incident before it, a pattern of repeated or escalating violence may remain institutionally fragmented even where significant information already exists within the system. This problem is closely connected with the broader deficiencies in administrative data and interoperability identified in relation to Article 11. The absence of integrated case-level information makes it more difficult to reconstruct the full institutional history of repeated violence and to identify escalation at the moment when preventive intervention is most needed. For Article 51 purposes, authorities should therefore ensure that risk assessment systematically incorporates all available information concerning previous reports, police interventions, criminal and misdemeanour proceedings, emergency and temporary protection measures and their breaches, threats, stalking, access to weapons and other relevant indicators concerning the same perpetrator. At the same time, information exchange should serve risk management and victim safety, rather than becoming an administrative objective in itself. Once a high or escalating risk is identified, it must lead to timely and proportionate protective measures and an individual safety plan developed in coordination with the victim and, where relevant, addressing the safety of her children.

Femicide trends, criminal-law response and systemic failures in detecting serial violence against women

Femicide and attempted femicide remain among the most serious manifestations of gender-based violence against women in North Macedonia. The long-term monitoring conducted by the National

¹²⁵ Ibid.

Network to End Violence against Women and Domestic Violence indicates a particularly concerning recent trend. During 2025, six women were killed and four attempted killings of women were recorded. From January to September 2026, seven women have already been killed and two attempted killings have been recorded. This means that, within less than two years, at least 13 women have been killed and six have survived attempted killings.¹²⁶ These figures are based on the National Network's ongoing monitoring of reported cases. Not every killing of a woman can automatically be classified as femicide. However, every killing, suspected violent death and attempted killing of a woman should be examined through a gender-sensitive methodology capable of identifying intimate-partner and domestic violence, coercive control, stalking, sexual violence, misogynistic motives, separation-related risks, previous threats or reports and the targeted victimisation of women in situations of particular vulnerability. The absence of such an assessment creates a risk that gender-related killings will be recorded, investigated and prosecuted as ordinary homicides without examining their gendered context. It may also prevent institutions from identifying connections between separate cases, recognising repeated offending and detecting patterns in the selection of victims.

Criminal-law recognition and limited judicial application

The amendments to the Criminal Code adopted in February 2023 represented an important legislative development. Article 123 paragraph 2 point 2-a recognises the killing of a woman or girl in the course of domestic violence or gender-based violence against women as a qualified form of murder. The State report submitted to GREVIO also presents this amendment as the criminalisation of femicide as an aggravated form of homicide. The prescribed punishment is imprisonment of at least ten years or life imprisonment.¹²⁷ Despite this legislative recognition, the practical application of the provision remains extremely limited. According to the court monitoring conducted by the National Network, only one monitored judgment has so far explicitly recognised and legally qualified the killing of a woman as femicide under the amended Article 123 paragraph 2 point 2-a. The judgment was delivered by the Basic Court in Kochani in the case concerning the killing of Tankica Mladenovska. She was attacked by her former intimate partner while going to work and sustained 43 stab wounds. The court recognised that the killing had been committed in the context of gender-based violence and imposed a life sentence. This judgment represents an important example of the application of the qualified form of murder introduced in 2023.¹²⁸ However, other courts and prosecutorial authorities have not consistently applied the same legal qualification in cases involving indicators of intimate-partner violence, domestic violence or the gender-related killing of a woman. The existence of a qualified offence is not sufficient if the possible gender-related circumstances are not examined from the beginning of the investigation and subsequently reflected in the legal qualification, indictment and judgment.

¹²⁶ National Network, ongoing monitoring data on killings and attempted killings of women, 2025–September 2026.

¹²⁷ Criminal Code, Article 123, paragraph 2, item 2-a, as amended in February 2023, Official Gazette of the Republic of North Macedonia No. 36/2023; Government of North Macedonia, State Report to GREVIO for the First Thematic Evaluation Round, 2026, pp. 15–16.

¹²⁸ National Network to End Violence against Women and Domestic Violence, court-monitoring documentation concerning the judgment of the Basic Court Kochani in the case of the killing of Tankica Mladenovska.

A consistent approach requires police officers, public prosecutors and judges to examine the wider context in which the killing occurred. This should include the relationship between the victim and the perpetrator, previous violence, threats, stalking or controlling behaviour, separation or attempts by the woman to end the relationship, previous institutional contacts and other evidence indicating that the woman was killed in circumstances connected with gender-based violence.

The ongoing Kumanovo serial killings trial

The ongoing proceedings before the Basic Court in Kumanovo concerning alleged serial violence against women raise particularly serious concerns about the capacity of institutions to identify connections between violent deaths and attacks against women. According to the indictment, the defendant is charged with the murders of four women and with two attempted murders. As the trial is ongoing, his criminal responsibility for the individual offences remains to be determined by the court, in accordance with the presumption of innocence.¹²⁹ Irrespective of the final outcome of the proceedings, the circumstances that preceded the trial reveal significant deficiencies in the initial institutional response. In relation to some of the deceased women, the deaths were not initially identified or investigated as possible violent deaths. The bodies had already been buried and subsequent exhumations were necessary in order to establish the cause and circumstances of death. One of the cases concerns 35-year-old Marija M. According to publicly available information, she had expressed fear shortly before her death, and her family had previously reported that the defendant was following her. Nevertheless, her death was not initially treated as suspicious and she was buried without an autopsy. Only after information emerged linking the defendant with other violent attacks was her body exhumed. The subsequent forensic examination established that she had died a violent death.¹³⁰¹³¹ The need to conduct exhumations in relation to women whose deaths had not initially been adequately investigated is a particularly serious indicator of institutional failure. It raises questions about the initial examination of the bodies, the assessment of the circumstances at the scene, the decision not to order an autopsy and the exchange of information among police, public prosecution and forensic authorities. The case also demonstrates the consequences of examining each death or attack as an isolated incident. Had information concerning the victims, previous reports, the circumstances of the deaths, attempted killings and the possible targeting of women living alone been brought together earlier, the competent authorities might have been in a stronger position to identify a recurring pattern and assess the risk posed by the same person.

The targeting of older women and women living alone in rural communities additionally demonstrates the need for an intersectional approach to femicide prevention. Age, isolation, rural residence, disability, economic dependency and limited access to institutions may increase both exposure to violence and the likelihood that suspicious circumstances surrounding a woman's

¹²⁹ National Network to End Violence against Women and Domestic Violence, court-monitoring documentation concerning the ongoing proceedings before the Basic Court Kumanovo, 2026.

¹³⁰ Sloboden Pечат, 'По трагите на серискиот убиец од Кумановско', 2026, available at: <https://www.slobodenpechat.mk/video-sloboden-pechat-po-tragite-na-seriskiot-ubiec-od-kumanovsko-meshtanite-se-prashuvaat-mozhel-li-sam-da-go-smisli-planot-ili-imal-uchitel/>.

¹³¹ Vecer, 'Екshумацијата разоткри крвава вистина – Марија била убиена, таткото бара правда', 2026, available at: <https://www.vecer.press/ekshumacijata-razotkri-krvava-vistina-marija-bila-ubiena-tatkoto-bara-pravda/>.

death will receive insufficient scrutiny. The Kumanovo proceedings therefore raise issues extending beyond the determination of the individual criminal responsibility of the defendant. They require an independent and comprehensive review of the actions and omissions of all institutions that had contact with the cases, including whether previous reports were properly recorded and investigated, whether the circumstances of each death justified an autopsy, whether information from separate incidents was connected and whether earlier identification of the pattern could have prevented subsequent killings or attempted killings.

Femicide Watch and the development of a national Femicide Observatory

An important recent development is the establishment of the Femicide Watch initiative, aimed at developing a coordinated and multisectoral mechanism for monitoring and preventing femicide in North Macedonia. The initiative builds on previous work supported by the OSCE Mission to Skopje, including retrospective analysis of femicide cases, court monitoring and cooperation with civil society, including the National Network to End Violence against Women and Domestic Violence.¹³² The initiative is particularly relevant to Article 51 because retrospective analysis of femicides can identify patterns that may not be visible when institutions examine individual incidents separately. Previous work has highlighted recurring concerns related to long-term histories of violence, fragmented institutional information and shortcomings in the institutional response, reinforcing the need for a unified and evidence-based prevention framework.¹³³ At the centre of this process is a Multisectoral Working Body, bringing together representatives of relevant institutions and civil society, including law enforcement, prosecution, the judiciary, social and health sectors and civil society organisations. Its work is intended to enable systematic examination of femicide and attempted femicide cases, including retrospective analysis of cases recorded since 2014 and monitoring of new cases, with the purpose of identifying trends, institutional gaps and opportunities for prevention.¹³⁴ The National Network is directly involved in this process and has contributed through its work on femicide case analysis and court monitoring, as well as through the development of a Femicide Observatory/platform intended to support systematic monitoring of femicides and attempted femicides in North Macedonia. The platform is designed to bring together relevant case-level information and enable analysis of factors such as the relationship between victim and perpetrator, previous reports of violence, protection measures, identified risk indicators, institutional actions, procedural status and regional patterns.

The Observatory is intended to include both retrospective analysis of femicides and attempted femicides and ongoing monitoring of new cases, while respecting requirements concerning anonymisation, protection of personal data and ethical use of case information. Its value lies not merely in creating another database, but in enabling accumulated information to be analysed for prevention purposes and in supporting evidence-based recommendations to institutions. This

¹³² OSCE Mission to Skopje, *Joining forces to stop femicide: Strengthening system-wide co-ordination to prevent femicide in North Macedonia*, 25 November 2025. The OSCE describes the Femicide Watch initiative and the development of a multisectoral mechanism for monitoring and preventing femicide, building on retrospective case analysis, court monitoring and cooperation with civil society, including the National Network to End Violence against Women and Domestic Violence [link](#).

¹³³ Ibid.

¹³⁴ Ibid.

development is particularly important because the effectiveness of risk assessment cannot be evaluated solely through individual case files. A systematic overview of fatal and near-fatal cases can reveal repeated patterns concerning previous reporting, separation, threats, stalking, protection measures, institutional contacts, escalation of violence and other risk indicators that may otherwise remain dispersed across different institutions. The combination of the Multisectoral Working Body and the Femicide Observatory/platform therefore has the potential to strengthen both prevention and institutional accountability. It can create a structured link between individual case review, identification of recurring systemic shortcomings and recommendations for changes in risk-assessment and risk-management practice. At the same time, the mechanism is still at an early stage of implementation. Its effectiveness will depend on whether it develops into a permanent, operational and genuinely multi-agency mechanism, with a clear methodology, regular access to relevant institutional records, meaningful participation of specialist women's organisations and procedures ensuring that identified systemic failures lead to concrete institutional changes.

Femicide reviews as a prevention and accountability mechanism

The development of Femicide Watch and the Femicide Observatory also represents an opportunity to move beyond isolated internal reviews of fatal cases. The internal investigation carried out by the Ministry of Interior following the killing of Rosica K. demonstrates the importance of retrospective scrutiny and institutional accountability. However, an internal review conducted by one institution cannot substitute for a comprehensive multi-agency examination of the institutional response preceding a femicide. A systematic femicide review should reconstruct the complete institutional history preceding the killing, including contacts with police, Social Work Centres, healthcare institutions, prosecution offices and courts; previous reports and proceedings; risk assessments; emergency and temporary protection measures and their possible breaches; and the information available to each institution at different stages. Where relevant, reviews should also examine attempted femicides. Near-fatal cases may provide equally important information about escalation patterns and missed opportunities for prevention without waiting for violence to result in death. The objective should not be limited to establishing individual disciplinary responsibility. The broader preventive function should be to identify recurring systemic failures, missed opportunities for intervention and institutional practices that require modification, and to ensure that lessons from fatal and near-fatal cases lead to changes in risk assessment, risk management, institutional coordination and professional practice. For this reason, the establishment of the Multisectoral Working Body and the Femicide Observatory should be accompanied by clear procedures for translating case-review findings into recommendations, assigning institutional responsibility for their implementation and monitoring whether corrective measures have actually been introduced.

Assessment

North Macedonia has established standardised police risk-assessment procedures and mechanisms for cooperation with social services. The principal implementation gap under Article 51 is therefore no longer simply whether a risk-assessment instrument exists. The relevant question is whether institutions recognise risk as cumulative and dynamic, connect information concerning repeated violence across institutions, reassess danger when circumstances change and translate the assessment into timely and proportionate protection. Available evidence indicates weaknesses

precisely at these points. Problems remain concerning assessment of repeated and escalating violence, exchange of information, monitoring of protection measures and integrated consideration of previous reports and proceedings concerning the same perpetrator. The killing of Rosica K. in September 2025 is particularly significant because the Ministry of Interior subsequently confirmed shortcomings in police handling of some of her previous reports and initiated accountability procedures.¹³⁵ The case demonstrates the potentially serious consequences when a sequence of incidents and institutional contacts does not result in an effective escalating protection response. At the same time, the establishment of Femicide Watch, the Multisectoral Working Body and the development of the Femicide Observatory/platform represent significant steps towards a more systematic approach to learning from fatal and near-fatal cases. The participation of the National Network and other civil society actors is important for ensuring that the mechanism incorporates independent expertise and the experience generated through specialist work with women victims of violence. The next challenge is to ensure that these developments become fully operational and institutionally sustainable and that the findings generated through case reviews and the Observatory are systematically used to improve risk-assessment and risk-management practice. The effectiveness of Article 51 should consequently not be measured by whether a risk-assessment form exists or has been completed. The relevant test is whether the institutional system is capable of recognising escalating danger over time, combining the information available across institutions and intervening effectively before that risk becomes lethal.

Recommendation

The authorities should ensure that standardised, evidence-based risk assessment is systematically applied by all relevant institutions and in relation to all forms of violence against women covered by the Istanbul Convention. Risk assessment should be dynamic and repeated whenever circumstances change, including following repeated reports, escalation of violence, threats to kill, stalking, separation, breaches of protection measures or other indicators of increased risk or lethality. All relevant information concerning previous reports, police interventions, protection measures and their breaches, criminal and misdemeanour proceedings and other known risk factors concerning the same perpetrator should be accessible to and systematically considered by the competent authorities. Procedures for information exchange should ensure that each new assessment takes account of the complete known history of violence rather than assessing individual incidents in isolation. Identified risks should result in proportionate and timely risk-management and protection measures based on an individual safety plan developed in coordination with the victim and addressing the safety of her children where relevant. The authorities should fully operationalise and institutionalise the newly established Femicide Watch mechanism, including the Multisectoral Working Body and the Femicide Observatory/platform, as a permanent multi-agency mechanism for the systematic review of gender-related killings and attempted killings of women. The mechanism should have a clear methodology, regular access to relevant institutional records, meaningful participation of specialist women's organisations and adequate human and financial resources. Reviews should reconstruct the complete institutional response

¹³⁵ Ministry of Interior, Review of the conduct of police officers of SIA Veles, 26 September 2025.

preceding fatal and near-fatal violence, identify systemic gaps and missed opportunities for prevention, and result in anonymised findings and recommendations capable of informing changes in legislation, policy and institutional practice. Clear responsibility should be established for implementing and monitoring recommendations arising from femicide reviews.

PART III – EMERGING TRENDS IN VIOLENCE AGAINST WOMEN AND DOMESTIC VIOLENCE

Digital manifestations of violence against women – Question 56(a)

Digital and technology-facilitated forms of violence against women have become an increasingly visible dimension of gender-based violence in North Macedonia. Rather than constituting a separate phenomenon, digital violence frequently accompanies or extends psychological violence, stalking, coercive control and intimate-partner violence into the online environment. Recent judicial information identifies an observable trend whereby psychological violence and control over women are increasingly accompanied by digital forms of abuse. Reported manifestations include threats and abusive messages through mobile applications and social media, publication or threats to publish explicit photographs, impersonation through the misuse of victims' social-media profiles, and contacting employers, colleagues or family members through digital channels as a means of pressure, exposure, discreditation or isolation.¹³⁶ These developments demonstrate an important continuum between offline and online violence. Digital tools may enable perpetrators to continue violence after separation, intensify monitoring and control, threaten public exposure and extend abuse into the victim's professional, family and social environment. This is particularly relevant in cases of intimate-partner and post-separation violence, where technology may provide additional means through which coercive control can continue despite the end of the relationship.¹³⁷ This understanding is consistent with GREVIO General Recommendation No. 1, which approaches the digital dimension of violence against women as a continuation of violence experienced offline and stresses that online and technology-facilitated manifestations must be addressed within the overall framework of the Istanbul Convention.¹³⁸ At the same time, available institutional data do not provide sufficient disaggregation to determine which groups of women are particularly affected by technology-facilitated violence, including according to age, disability, ethnicity or other relevant characteristics. This limits the possibility of assessing patterns of victimisation and developing targeted prevention and protection responses. GREVIO had already identified the lack of prevalence data on the digital dimension of violence against women in its baseline evaluation, including insufficient information concerning women exposed to intersecting

¹³⁶ Government of North Macedonia, Reply to GREVIO's Questionnaire, GREVIO/Inf(2026)1, Part III, Question 56(a), pp. 92–93.

¹³⁷ Ibid.

¹³⁸ GREVIO, General Recommendation No. 1 on the digital dimension of violence against women, 2021, paras. 24–30 and Recommendations.

forms of discrimination.¹³⁹ The broader difficulties concerning disaggregated and interoperable data identified under Article 11 therefore also affect the authorities' capacity to monitor emerging digital manifestations of violence against women.

Recent criminal-law developments

A significant legislative development occurred in 2026 with the introduction of a new criminal offence under Article 152-a of the Criminal Code – “Misuse of another person’s recording, photograph, audio recording or written material with sexually explicit content”. The amendment was adopted on 28 January 2026 and published in the Official Gazette of the Republic of North Macedonia No. 16/2026.¹⁴⁰ The introduction of Article 152-a represents an important step towards addressing a previously identified gap in criminal-law protection against image-based sexual abuse. The provision criminalises making sexually explicit video or other recordings, photographs, audio recordings or written material available to a third person without the consent of the person concerned. It also criminalises threats to make such material available. Importantly, it extends criminal liability to the creation of new or modification of existing sexually explicit audiovisual or other material through the use of a computer system or by other means, followed by its use or disclosure, thereby extending protection to manipulated digital content, including forms of deepfake sexual abuse.¹⁴¹ This development is particularly relevant in light of the experience of the “Public Room” (Javna Soba) case and the broader difficulties previously identified in providing effective protection against digital forms of violence against women. GREVIO’s baseline evaluation identified the growing problem of violence against women committed through digital means and called for stronger prevention and effective law-enforcement and judicial responses.¹⁴² The introduction of Article 152-a therefore represents a positive and necessary development in responding to image-based and technology-facilitated sexual abuse. Nevertheless, further alignment is necessary to ensure that such conduct is understood not solely as an interference with privacy, but also, where applicable, as a manifestation of gender-based violence. Image-based sexual abuse, threats to distribute intimate material, manipulated or AI-generated sexual content and other forms of technology-facilitated abuse may form part of a broader pattern of coercive control, stalking, sexual violence or post-separation violence. The National Network welcomed the introduction of the new offence as a significant and necessary step, while emphasising that further alignment is needed to ensure comprehensive protection of victims and recognition of the gendered nature of this form of violence. The Network also raised concerns regarding the scope and clarity of the term “sexually explicit content”, noting that technology-facilitated gender-based

¹³⁹ GREVIO, Baseline Evaluation Report – North Macedonia, GREVIO/Inf(2023)5, paras. 74–77.

¹⁴⁰ Republic of North Macedonia, Law Amending and Supplementing the Criminal Code, Official Gazette of the Republic of North Macedonia No. 16/2026, adopted on 28 January 2026 and published on 29 January 2026, Article 6, introducing new Article 152-a of the Criminal Code, “Misuse of another person’s recording, photograph, audio recording or written material with sexually explicit content”. See also Constitutional Court of the Republic of North Macedonia, U.br.162/2023 and U.br.163/2023, decision of February 2026, confirming the adoption and publication of the 2026 amendments.

¹⁴¹ Criminal Code, Article 152-a, paras. 1–3, as introduced by Official Gazette No. 16/2026.

¹⁴² GREVIO, Baseline Evaluation Report – North Macedonia, GREVIO/Inf(2023)5, paras. 133–137.

abuse may involve manipulated or sexualised representations and should be addressed in line with GREVIO General Recommendation No. 1 on the digital dimension of violence against women.¹⁴³

Remaining implementation gaps

The adoption of Article 152-a is an important legislative step, but its effectiveness will ultimately depend on implementation. Given that the offence entered into force only in February 2026, it is still too early to assess its application through comprehensive data on reports, investigations, prosecutions, convictions and sanctions. There are, however, already initial indications of its use in practice. In April 2026, the Public Prosecutor's Office announced an investigation in which a suspect was investigated, inter alia, for an offence under Article 152-a in connection with sexually explicit photographs and videos of a 14-year-old girl and threats to publish them.¹⁴⁴ This demonstrates that the new provision has begun to be invoked in criminal proceedings, but an individual case is insufficient to assess its broader effectiveness. Systematic monitoring will therefore be necessary to assess whether women subjected to technology-facilitated violence receive a timely and effective law-enforcement response and whether police, prosecutors and courts recognise the connection between digital conduct and wider patterns of intimate-partner violence, stalking and coercive control. Digital manifestations of violence should also be incorporated into risk assessment and risk management under Article 51. Persistent digital monitoring, threats, impersonation, threats to publish intimate material and technology-facilitated stalking should not be treated as isolated online incidents where they form part of a wider pattern of abuse. Such behaviour may indicate escalation and should inform the overall assessment of the risk faced by the victim.

Assessment and recommendation

North Macedonia has made important progress by introducing a specific criminal offence addressing the misuse and non-consensual dissemination of intimate and manipulated sexual content. However, further measures are required to ensure that digital manifestations of violence are systematically recognised and addressed as forms of gender-based violence and, where relevant, as part of a continuum of coercive control, stalking, sexual violence and post-separation abuse. The authorities should ensure the effective implementation of Article 152-a of the Criminal Code and further align the legal and institutional response to digital manifestations of violence against women with GREVIO General Recommendation No. 1. Police officers, prosecutors, judges and other relevant professionals should receive specialised training on image-based sexual abuse, technology-facilitated stalking and harassment, digitally enabled coercive control and manipulated or AI-generated sexual content. Digital manifestations of violence should be

¹⁴³ National Network, "New criminal offence concerning the misuse of intimate recordings, photographs and other audio content", 4 February 2026; GREVIO, General Recommendation No. 1, 2021.

¹⁴⁴ Public Prosecutor's Office of the Republic of North Macedonia, Detention proposed for a suspect in the rape of a child in Gostivar, 26 April 2026. The Prosecutor's Office reported an investigation concerning, inter alia, Article 152-a of the Criminal Code in relation to sexually explicit photographs and videos of a 14-year-old girl and threats to publish them.



systematically incorporated into risk assessment and safety planning. The authorities should also collect and publish disaggregated data on reports, investigations, prosecutions, convictions and sanctions concerning technology-facilitated violence against women in order to monitor the implementation of the new legal framework and identify remaining barriers to protection and access to justice.