

**CIVIL SOCIETY SHADOW REPORT
FIRST THEMATIC EVALUATION ROUND**

“Building trust by delivering support, protection and justice”

**Implementation of the Council of Europe Convention on Preventing and Combating Violence
against Women and Domestic Violence in the Republic of North Macedonia**

September 2026

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Methodology

This shadow report reflects the organisations' long-standing and continuous monitoring of the institutional response to violence against women and domestic violence in North Macedonia, including implementation of the Council of Europe's Convention. The findings are based on triangulation of information from multiple sources, including the experiences of women who have experienced gender-based violence and domestic violence as rights-holders; consultations and direct work with decision-makers, practitioners from relevant institutions and justice system as duty-bearers; information from civil society and international organisations; administrative and publicly available institutional data; national legislation and policy documents; and findings and recommendations of GREVIO and other international and regional human rights monitoring bodies. Particular attention was paid to comparing formal legal and policy obligations with their implementation in practice and with the factual situation and specific needs of women survivors.

Contribution of the organisations

Association for Emancipation, Solidarity and Equality of Women – ESE, founded in 1994, contributed its long-standing monitoring, research, advocacy and direct support experience concerning violence against women, with a particular focus on domestic and intimate-partner violence, while also examining the institutional response to other forms of gender-based violence covered by the Istanbul Convention. ESE's contribution draws extensively on its direct work with women survivors, monitoring of institutional and judicial practice, research on access to justice, healthcare and the economic consequences of violence, and continuous engagement with practitioners and decision-makers.

Association for Action Against Violence and Trafficking in Human Beings – Open Gate/La Strada Macedonia, founded in 2000, contributed its specialist expertise arising from its long-standing work on trafficking in human beings, exploitation and violence affecting women and girls, including prevention, identification, protection, support and reintegration. Its contribution helped ensure that the report also reflects the particular risks and barriers faced by women and girls exposed to trafficking and related forms of violence and exploitation.

Edinburgh International Justice Initiative – EIJI provided expert support through two thematic legal and comparative analyses addressing issues of critical importance for the long-term safety and independence of women who have experienced domestic violence: child maintenance and sustainable long-term housing. These analyses complemented the empirical evidence gathered in North Macedonia by examining relevant international standards and comparative legal and institutional models, and supported the development of recommendations aimed at strengthening women's economic security, housing stability and ability to rebuild their lives after violence.

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

ARTICLE 7: COMPREHENSIVE AND CO-ORDINATED POLICIES

GREVIO 2023 baseline findings and summary of developments

In its 2023 baseline evaluation, GREVIO welcomed the legal and strategic framework established through the Law on the Prevention of and Protection from Violence against Women and Domestic Violence and the Action Plan for the Implementation of the Istanbul Convention. At the same time, it identified significant implementation gaps and called for full implementation of the existing by-laws, adoption of those still outstanding and implementation of all actions foreseen in the Action Plan. GREVIO also called for the National Co-ordination Body to be provided with the financial and human resources required for sustainable functioning and for co-ordination and implementation to be supported by reliable monitoring, evaluation and data.

Since the baseline evaluation, several important developments have taken place. The 2023 Criminal Code amendments strengthened the legal framework for different forms of violence; a Protocol on inter-institutional co-operation was adopted in 2023; a Programme for the Reintegration of Victims was adopted in 2024; an evaluation of the 2018–2023 Action Plan was prepared; and the development of a new National Strategy 2026–2033 and Action Plan 2026–2029 was initiated. The State report also refers to training, awareness-raising, data-system initiatives and other institutional measures.

These developments expand the formal framework, but the central weakness remains the gap between the adoption of laws, policies and individual measures and their effective implementation through a sufficiently resourced, co-ordinated and evidence-based system.

Question 1 – Comprehensive and operational policies covering all forms of violence

Strategic planning is not organised as an evidence-based policy cycle. Policies and measures are not systematically planned on the basis of assessed needs, implementation gaps, institutional capacities, available resources and the results of previous interventions. Monitoring continues to focus predominantly on whether activities, documents or services were formally completed, rather than whether they improved women's safety, access to protection and services, recovery and access to justice. This limits the ability to determine which measures should be continued, modified or discontinued. The new National Strategy 2026–2033 and Action Plan 2026–2029 provide an opportunity to address this deficiency. At the time of preparation of this report, however, the Strategy was still in the process of adoption and the Action Plan had not been finalised or budgeted. The working version available during the drafting process did not contain a comprehensive cost assessment or budgetary framework.

Implementation remains territorially and institutionally uneven. The same statutory obligations are not consistently implemented across institutions and regions. Local co-operation mechanisms are unevenly developed, while differences in institutional capacity and professional practice affect access to protection. As a result, women's effective access to protection and support may continue to depend on their place of residence and on the capacity and practice of the institution concerned.

A complete four-pillar response has not been developed for all forms of violence covered by the Convention. Domestic violence continues to receive substantially greater policy and institutional attention than other forms of violence. Although stalking, sexual harassment, female genital mutilation and consent-based sexual offences have been introduced or revised in criminal law, criminalisation has not consistently been accompanied by corresponding prevention measures, specialist services,

operational protocols, professional capacity, harmonised data and monitoring. Forced and child marriage illustrate this gap particularly clearly. Forced marriage is recognised within the legal framework on gender-based violence and may also fall within trafficking-related offences, but no comprehensive policy response has been established across prevention, identification, protection, investigation and long-term support. Open Gate/La Strada's 2025 analysis¹ indicates that cases remain under-reported, may be treated as private family matters rather than identified as exploitation or gender-based violence, and that specialised identification procedures and institutional co-ordination remain insufficient. Particular concerns arise for Roma girls and girls from rural or socially excluded communities, including risks related to school dropout, unsafe return to family environments and insufficient long-term support. Violence against women is not yet systematically mainstreamed into relevant sectoral policies. Health, education, employment, social protection, housing, economic and other sectoral policies do not consistently incorporate specific objectives, responsibilities, budgets and indicators concerning violence against women. Regular mechanisms for joint planning and assessment between sectoral institutions are insufficiently developed. This lack of integration is reflected in the subsequent sections of this report: in fragmented prevention measures and in gaps affecting women's access to legal, health, social, economic and housing support.

Question 2 – Alignment and consistent application of definitions

Formal alignment of the core definitions has not been followed by demonstrated cross-sectoral operational harmonisation. North Macedonia's core statutory definitions of violence against women, gender-based violence against women and domestic violence are formally aligned with Article 3 of the Convention. The remaining concern is therefore not primarily their wording, but whether these definitions are consistently operationalised across legislation, by-laws, protocols, institutional forms, professional guidance and administrative data systems. Available information does not demonstrate that police, Centres for Social Work, healthcare institutions, prosecutors and courts use harmonised criteria when identifying, recording and responding to domestic and intimate-partner violence, including post-separation violence, psychological and economic violence, coercive control, sexual violence and its digital dimension. The need is therefore for consistent practical application of already aligned definitions throughout the institutional system, rather than another formal revision of the principal statutory definitions.

Question 3 – Women's rights, empowerment and intersectionality

Women's safety, autonomy, recovery and empowerment are not systematically used as measurable policy outcomes. These principles are recognised in law and policy, but monitoring does not systematically establish whether women are safer, able to exercise informed choices, economically independent, able to access their rights or supported in long-term recovery. Existing monitoring remains focused predominantly on institutional activities and outputs.

Meaningful participation of women survivors is not institutionalised. Women's rights organisations play an important role in consulting women and bringing their experiences into policy processes. However, there is no permanent, safe and accessible mechanism through which women survivors themselves can meaningfully contribute to policy design, implementation, monitoring and evaluation. Participation of women's organisations is essential but cannot automatically be treated as equivalent to direct participation of women affected by violence.

¹ [Open Gate/La Strada, Policy Brief: hidden exploitation: it is time for institutions, the civil sector, and society to respond together](#)

The intersectional approach remains insufficiently operationalised. The legal framework recognises women in vulnerable situations, but general references to vulnerability are not consistently translated into differentiated measures, designated responsibilities, dedicated resources and measurable outcomes addressing the specific barriers faced by different groups of women. An effective intersectional approach requires evidence on actual barriers to reporting, protection, services and rights to inform differentiated policy responses rather than assuming that identical measures provide equal access to all women.

RECOMMENDATIONS – ARTICLE 7

Relevant 2023 GREVIO recommendations that should be reiterated:

- ensure the effective implementation of the legal and policy framework for preventing and combating violence against women, including the measures necessary to give practical effect to the obligations established under the Law and the national strategic framework;
- reiterate its recommendation concerning the National Co-ordination Body, by ensuring that it has adequate and permanent financial, human, professional and administrative resources to fulfil its co-ordination role, while maintaining a clear distinction between policy co-ordination and implementation, on the one hand, and independent monitoring and evaluation, on the other.

Further specification proposed in light of the 2023 GREVIO findings and current developments:

- ensure that the new National Strategy and Action Plan are accompanied by a costed implementation framework identifying responsible institutions and units, implementation timelines, baseline and target values, qualitative and quantitative indicators, and expected outputs, outcomes and impact;
- ensure that each form of violence covered by the Convention is addressed through a complete and operational response encompassing prevention, protection and support, investigation and prosecution, inter-institutional co-operation, data collection and monitoring;
- with particular regard to forced and child marriage, ensure a comprehensive response combining prevention, early identification, protection and long-term support with effective investigation and prosecution, including specialised inter-institutional procedures, capacity to address online recruitment and digital coercion, and targeted prevention for girls facing heightened risks, including Roma girls and girls in rural and socially excluded communities. The authorities should also address the remaining legislative gaps concerning the criminalisation of forced marriage and the possibility of marriage below the age of 18.
- systematically integrate the prevention of and response to violence against women into health, education, employment, social protection, housing, economic and other relevant sectoral policies, with corresponding objectives, responsibilities and indicators.

Additional recommendations based on the current findings:

- establish an evidence-based policy cycle in which data and evidence from prevention, protection and support, and justice systems are jointly used to identify priorities, territorial inequalities, implementation gaps and groups facing particular barriers, and to adapt future policies and measures accordingly;
- establish permanent, safe and accessible mechanisms for the meaningful participation of women survivors in the design, implementation, monitoring and evaluation of policies affecting them;
- introduce victim-centred outcome indicators measuring, inter alia, women's safety, access to rights and services, informed decision-making, autonomy, economic independence and long-term recovery, with differentiated monitoring of outcomes for women exposed to intersecting forms of discrimination.

ARTICLE 8: FUNDING

GREVIO 2023 baseline findings and summary of developments

GREVIO strongly encouraged North Macedonia to ensure appropriate human and financial resources for all legislation, policies and measures aimed at preventing and combating violence against women, including adequate funding for relevant institutions and specialist civil-society services. It specifically called for dedicated and transparent funding lines enabling regular monitoring of allocation and expenditure. GREVIO also called for sustainable funding of women's rights organisations, including through long-term funding arrangements, and for their expertise and gendered, victim-centred approach to be fully recognised.

Since then, public funding continues to be provided through existing budget programmes and annual administrative contracts. The State report indicates that specialist organisations received MKD 4 million in 2023, MKD 6 million in 2024 and MKD 4.6 million in 2025. It also acknowledges the need for greater predictability and sustainability of this financing model.

Question 4 – Appropriate and sustainable financial and human resources

There is no integrated resource-planning system connecting statutory obligations with their actual financial and human-resource requirements. New laws, programmes and institutional responsibilities are not consistently accompanied by systematic costing, secured budget allocations, staffing plans or mechanisms for determining whether available resources are sufficient. Expenditure related to violence against women remains largely embedded within broader institutional programmes, making it difficult to identify the actual level of public investment and compare planned with executed expenditure.

There is no common methodology for costing and tracking expenditure across institutions. The Government and Ministry of Finance have a central role in translating legal obligations of the ministries into resources, yet there is no common methodology defining how expenditure related to violence against women should be identified, classified, costed and reported across ministries and local authorities. Consequently, it is not possible to systematically assess the gap between the resources required to implement legal obligations and those actually made available.

Human-resource needs and institutional continuity are not systematically planned. There are no consolidated data on required staffing, vacant posts, workloads, turnover or territorial distribution of specialised personnel. The departure of experienced professionals is also not systematically accompanied by succession planning and structured transfer of knowledge. Project and donor support continues to finance important activities, but such support cannot substitute for regular public financing of permanent statutory responsibilities. The same resource problem affects newly established mechanisms. Although the Commission for Monetary Compensation of Victims of Violent Crimes is operational, limited financial and human resources constrain its capacity to provide an effective and accessible compensation mechanism.

Question 5 – Sustainable funding for women's rights organisations

Funding remains predominantly annual, fragmented and service-specific. Annual administrative contracts do not provide sufficient predictability for specialist organisations to retain professional staff, maintain services and plan their work over several years. Funding frequently covers selected licensed services rather than the full package of interconnected support women may require. Financing of Open Gate/La Strada illustrates the scale of this gap. State funding covered only 12.3% of the organisation's expenditure for assistance and support to victims of trafficking in 2022 and approximately 36% in 2023.

More recent service budgets show that the amounts requested from the Ministry for the Centre for Victims of Trafficking represented only 28.5% of the estimated annual cost in 2025 and 30.8% in 2026, leaving around 70% to be secured from donors and other sources. The financing model remains linked largely to the number of accommodated beneficiaries and does not adequately recognise the fixed costs of maintaining a licensed service with specialised staff available on a continuous basis². Local financing is also absent. Of the 57 municipalities contacted during Open Gate's monitoring, 33 responded, and none reported a specific budget allocation or programme for assistance to victims of trafficking or support to specialised civil-society organisations. This significantly limits access to community-based psychological support, healthcare, education, vocational training, employment and reintegration after women and girls leave the Centre. The funding framework also does not adequately recognise the additional needs of migrant and foreign women and girls, including interpretation, legal assistance, residence-related procedures, healthcare and individually tailored support. Open Gate's monitoring identified possible barriers to the identification and protection of foreign victims and recommended guaranteed access to qualified interpreters and accessible information and support.

The full cost of maintaining specialist services is not systematically financed. Public financing does not consistently cover permanent staff, supervision, continuous training, premises, utilities, accessibility, interpretation, outreach, referral and accompaniment, administration and the organisational infrastructure required to keep a specialist service continuously available. These gaps are particularly relevant for migrant, refugee, asylum-seeking and foreign women and girls, where effective support may additionally require qualified interpretation, assistance with residence or asylum-related procedures, accessible information and individually tailored legal and psychosocial support.

The wider role of women's rights organisations remains largely unfunded. Their contribution extends beyond direct services to prevention, research, monitoring, advocacy, professional training, policy development and accountability. These functions remain substantially dependent on organisational or donor resources rather than regular public funding.

Licensing and funding arrangements may contribute to gaps in territorial access. Quality and accessibility standards are necessary, but licensing requirements that cannot be met without adequate public financial and technical support may exclude experienced providers from the formal referral system, including in areas where no alternative specialist service exists.

RECOMMENDATIONS – ARTICLE 8

Relevant 2023 GREVIO recommendations that should be reiterated:

- ensure appropriate and sustainable human and financial resources for the implementation of all policies, measures and legislation aimed at preventing and combating violence against women, together with dedicated and transparent funding lines enabling regular monitoring of allocations and expenditure;
- reiterate its 2023 recommendation under Article 9 to ensure, through adequate funding, a sustainable role for independent women's rights organisations providing specialist support services, including through long-term and transparent funding arrangements.

Further specification proposed in light of the 2023 GREVIO findings and current developments:

² [Open Gate/La Strada, North Macedonia, Monitoring report review of the policies and practices in the fight against trafficking in human beings, 2023](#)

- ensure that major legislation, strategies, programmes and new institutional responsibilities concerning violence against women are accompanied by systematic costing, identified sources of financing and assessments of the human, technical and infrastructural resources required for implementation;
- establish systematic human-resource planning covering staffing requirements, workloads, vacancies, turnover, territorial distribution of specialised professionals and succession and knowledge transfer;
- ensure that public funding for specialist women's organisations is predictable and, where appropriate, multiannual, and covers the realistic full cost of maintaining quality specialist services, including professional staff, supervision, premises, accessibility, qualified interpretation, outreach, case management and other necessary operational costs, as well as additional costs associated with supporting migrant, refugee, asylum-seeking and foreign women and girls;
- review funding and licensing arrangements together, ensuring that legitimate quality and accessibility requirements are accompanied by adequate financial and technical support and do not result in geographical gaps in specialist service provision.

Additional recommendations based on the current findings:

- require the Government and the Ministry of Finance to establish a common methodology for planning, classifying, costing, tracking and publicly reporting expenditure related to violence against women across national and local institutions, including planned, approved and actual expenditure and the source of financing;
- establish a system for assessing whether resource allocations correspond to identified needs, statutory responsibilities, territorial disparities, institutional workloads and implementation results;
- provide sustainable public support that recognises the broader role of independent women's rights organisations beyond service provision, including their contribution to prevention, research, monitoring, professional capacity building, advocacy, policy development and accountability.

ARTICLE 11: DATA COLLECTION AND RESEARCH

GREVIO 2023 baseline findings and summary of developments

GREVIO identified fragmented and incomplete administrative data as a major systemic weakness. It urged the authorities to ensure harmonised data collection across law enforcement, judicial authorities, health and social services, disaggregated by sex and age of victim and perpetrator, their relationship, geographical location and form of violence. It also specifically called for harmonisation between law enforcement and the judiciary to enable analysis of case pathways and attrition, for data on breaches and sanctions concerning protection orders, and for systematic healthcare-sector data.

Since then, relevant technical and regulatory steps have been taken. An integrated multi-institutional data model was developed, the SWISS platform has been introduced within social protection, and rulebooks regulating data collection by courts and public prosecutors have been adopted. However, the State report itself confirms that the new integrated system in social work centres is still being established and that the integrated data-collection rulebook is linked to its future operationalisation.

The central deficiency identified by GREVIO therefore remains unresolved: administrative data continue to be generated through institution-specific systems rather than through a fully operational

harmonised framework capable of producing comparable cross-sectoral information and following cases through the institutional and judicial chain.

Question 6 – Harmonised administrative data across sectors

Technical and regulatory developments have not yet produced a fully operational harmonised national data system. The existence of an integrated model, software development and sector-specific rulebooks represents progress, but the routine collection, publication, exchange and analysis of comparable data across police, Centres for Social Work, healthcare, prosecution and courts, is still lacking.

A more basic problem also remains unresolved: not all competent institutions systematically collect and publicly report data on the cases they handle. This is particularly significant in relation to domestic violence, which has been specifically regulated for more than two decades. The Ministry of Interior is a positive exception and continues to make domestic-violence data publicly available. However, the previous practice of quarterly publication was discontinued in 2024 and should be restored, in addition to annual reporting.

The adoption of data-collection rules has not yet ensured their implementation in practice. Rulebooks governing data collection by courts and public prosecutors have been adopted, but their consistent operational implementation has not been demonstrated. In the judiciary, existing information systems still require technical upgrading. The Basic Civil Court Skopje confirmed that ACMIS does not allow systematic tagging and filtering of domestic-violence cases by the required categories and that relevant information must still be extracted manually.

Social-services data remain insufficiently transparent and do not always capture the information needed to assess women's access to protection. Data generated by Centres for Social Work are not regularly published by the Ministry in a dedicated and accessible format and are mainly available through annual reporting of the Institute for Social Activities. In addition, some indicators are recorded in a way that limits meaningful analysis. For example, recording the number of temporary protection measures rather than the number of proposals for temporary protection measures submitted by Centres for Social Work does not show how many women or cases resulted in the Centre formally requesting protection from the court.

Data collected by different institutions are not based on sufficiently harmonised parameters and are therefore not systematically comparable. Police and social-services data use different categories and recording practices, preventing reliable comparison of the same phenomena across institutions. This also limits the possibility of assessing institutional performance and identifying where women are lost between reporting, referral and protection.

Administrative data remain predominantly focused on domestic violence, while other forms of violence against women are not systematically recorded and published. Some institutions have mechanisms for coding domestic-violence cases but no equivalent operational practice for psychological, economic, sexual, stalking, harassment, digital and other forms of gender-based violence covered by the Convention. This prevents the State from assessing the scale and institutional response to those forms of violence.

Administrative data are not yet used as an integrated evidence base for policy planning. Without complete, comparable and publicly available data across institutions, regions and forms of violence, the authorities cannot reliably identify reporting patterns, barriers to protection and services, territorial disparities or groups requiring targeted preventive and protective interventions.

Question 7 – Protection orders, breaches and custody outcomes

The specific data requested by GREVIO are still not routinely available. The published State report indicates that collection of information concerning breaches of emergency and protection orders, resulting sanctions and relevant custody decisions was still under way. This confirms that the national system is not yet capable of routinely producing the requested consolidated data. Counting the number of protection orders is not sufficient. The system should show whether orders are complied with, whether breaches are detected, what institutional response follows, whether sanctions are imposed and whether the woman is subsequently subjected to further violence.

Similarly, data on custody and visitation proceedings should make it possible to assess whether domestic violence was identified and taken into account and whether parental or visitation rights were restricted where necessary for safety.

Question 8 – Tracking cases from reporting to conviction

Administrative traceability within individual institutions is not equivalent to end-to-end case tracking. The State report describes an institutional pathway linking reporting, social services, protection measures, enforcement, prosecution and criminal proceedings. However, the fact that individual institutions register procedural actions or exchange certain decisions does not demonstrate that the same case can be statistically followed from the initial report through police investigation, prosecution, indictment, trial and final judicial outcome.

There is no demonstrated common case identifier or equivalent secure mechanism enabling police, prosecution and court records to be linked systematically. Consequently, authorities cannot reliably calculate attrition between stages, establish where and why cases are discontinued or assess whether procedural reforms improve accountability.

RECOMMENDATIONS – ARTICLE 11

Relevant 2023 GREVIO recommendations that should be reiterated:

- establish harmonised and disaggregated administrative data collection covering all forms of violence against women across law-enforcement agencies, judicial authorities, health and social services, including at a minimum the sex and age of the victim and perpetrator, their relationship, geographical location, type of violence and the presence of child victims or witnesses;
- establish systematic data collection on breaches of emergency barring, restraining and protection orders, the institutional response to such breaches, sanctions imposed and cases of subsequent revictimisation or killing following a breach;
- reiterate, in conjunction with its recommendation under Article 31, the need to monitor custody and visitation practice in cases involving domestic violence, including data on decisions restricting, suspending or withdrawing custody, visitation or parental rights because of violence;
- harmonise law-enforcement and judicial data so as to enable analysis of case pathways, conviction rates and attrition throughout the criminal justice chain.

Further specification proposed in light of the 2023 GREVIO findings and current developments:

- ensure that the developing data systems use mandatory common definitions, indicators and minimum datasets and become interoperable across institutions, with particular priority given to operationalising systematic healthcare-sector data collection and ensuring coverage of all forms of violence rather than predominantly domestic violence;

- ensure that data on protection orders allow assessment not only of the number of orders issued, but also of their implementation and enforcement, breaches, institutional responses, sanctions and subsequent violence, thereby enabling assessment of their actual protective effect;
- establish an interoperable mechanism enabling the same case to be followed from the initial report through police investigation, prosecution, indictment, trial and final judicial outcome, through a common case identifier or another secure linking method, allowing regular analysis of attrition, delays and reasons for discontinuation;
- require each competent institution to systematically collect and regularly publish standardised administrative data on the cases it handles, using harmonised definitions, indicators and reporting periods; existing quarterly publication by the Ministry of Interior should be restored and equivalent regular reporting introduced across other relevant institutions;
- ensure the full operational implementation of the adopted data-collection rulebooks, including the necessary upgrading of ACMIS and other institutional information systems, so that data can be generated automatically rather than through ad hoc or manual extraction.

Additional recommendations based on the current findings:

- systematically use administrative data as part of an evidence-based policy cycle, combining information on reporting patterns, prevalence where available, access to protection measures and services, institutional outcomes and barriers experienced by women in order to identify territorial and population priorities and target preventive and protective interventions;
- ensure that harmonised administrative data are regularly analysed and publicly reported in aggregated and anonymised form, so that implementation gaps, territorial disparities and trends in institutional response can be identified and monitored over time;
- review the indicators currently collected by each institution to ensure that they capture key stages of the institutional response, including reports received, referrals made, proposals or applications for protection measures, measures granted and their implementation, rather than only aggregate numbers of measures or institutional actions.

Cross-cutting confirmation by the State Audit Office

In its 2025 performance audit on the implementation of the Istanbul Convention, focused particularly on specialist services for women victims of gender-based violence and domestic violence, the State Audit Office independently confirmed many of the systemic deficiencies identified above. The audit, covering primarily the period 2018–2023 while also considering selected subsequent developments, concluded that the measures undertaken by the competent institutions were not sufficiently effective to ensure prevention, protection, support and full reintegration of victims. It found that only 22 of the 52 activities in the 2018–2023 Action Plan had been fully implemented; that the reintegration programme lacked a defined timeframe, clear objectives and measurable indicators; that Centres for Social Work and specialist services faced staffing and territorial-coverage gaps; that no cost analysis had been carried out to determine the resources required for specialist services; that the National Co-ordination Body was not fully performing its functions; and that an integrated system capable of producing accurate, timely and harmonised data across institutions was still absent. These findings provide independent institutional confirmation of the continuing gaps in strategic implementation, resources, co-ordination, specialist services and data systems identified in this report³.

³ State 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 particular reference to specialised services for women victims of gender-based violence and domestic violence*, No. 14-53/21, 27 June 2025.

ARTICLE 12: GENERAL OBLIGATIONS

GREVIO 2023 baseline findings

GREVIO stressed that prevention should address the social and cultural patterns underlying women's subordinate position and violence against women. While recognising the connection established in law and policy between prevention, gender equality and women's empowerment, it found harmful gender stereotypes to remain widespread. GREVIO also called for greater attention to forms of violence beyond domestic violence, stronger prevention for women exposed to intersectional discrimination and greater involvement of men and boys.

Developments since the baseline evaluation

Several awareness-raising campaigns and preventive activities have been undertaken since 2023. These represent useful developments, but they do not yet demonstrate the existence of a continuous, publicly financed and institutionally co-ordinated national prevention system.

The principal gap is therefore no longer the absence of legal responsibilities, but their implementation through a coherent prevention system. **At institutional level, preventive responsibilities are not consistently brought together within a single programme or planning framework.** This is particularly evident in the Ministry of Social Policy, Demography and Youth, whose responsibilities for awareness-raising, professional training, prevention in pre-school institutions and perpetrator programmes are still largely implemented as separate activities rather than jointly planned, implemented, monitored and evaluated so that they reinforce one another. At inter-institutional level, activities are not systematically connected through common priorities, target groups, geographical coverage, financing and outcome indicators. The Government has not sufficiently assumed the co-ordinating and financing role necessary to link these different preventive responsibilities into a coherent national approach.

Question 9. Primary prevention and changing discriminatory social norms

Prevention remains insufficiently connected with gender equality. The legal framework recognises gender equality and elimination of stereotypes as underlying principles, but preventive interventions remain insufficiently linked with broader efforts to change women's subordinate position in the family and society. Violence prevention, women's economic independence, social participation and empowerment continue to be treated largely as separate policy areas.

Discriminatory social norms remain widespread. The OSCE survey continues to provide the principal nationally representative baseline: 37% of women reported that their friends would agree that a "good wife obeys her husband even if she disagrees", while 48% considered domestic violence a private family matter. Only 2% of women who had experienced violence reported it to the police⁴. No subsequent nationally representative survey using comparable indicators has been conducted.

Public information remains incomplete and focused predominantly on domestic violence. Psychological, economic, sexual and digital violence, stalking, sexual harassment and other forms of violence are less consistently addressed. Women therefore may not recognise particular conduct as violence and may also lack clear information on what protection, social, health, legal and economic support is available after disclosure or reporting.

Prevention does not systematically reach groups facing intersecting inequalities. Individual activities have targeted Roma women, rural women, women with disabilities and other groups, but there is no

⁴ OSCE, *OSCE-led Survey on Violence against Women: Well-being and Safety of Women – North Macedonia Results Report*, 2019.

consistent nationwide approach ensuring accessible information in relevant languages and formats and addressing the specific barriers faced by different groups.

Men and boys remain insufficiently engaged as agents of change. Available information does not demonstrate sustained nationwide programmes aimed at challenging harmful concepts of masculinity, male control over women and social tolerance of violence.

There is a lack of system for monitoring and evaluation of the impact of preventive effort. Monitoring continues to focus mainly on activities and reach, campaigns, events, materials distributed and social-media engagement, rather than changes in knowledge, attitudes, behaviour, recognition of violence or willingness to seek help. Institutions lack internal systems for evaluating impact, and there is no mechanism for assessing the cumulative effect of preventive interventions across sectors.

Prevention is not sufficiently informed by evidence from the protection and support system. Data on reporting, access to protection measures and services, and barriers encountered by women are not systematically used to identify prevention priorities. As a result, preventive activities are not strategically targeted towards regions with lower reporting rates, areas where access to protection and support is weaker, or groups of women facing greater barriers in exercising their rights.

RECOMMENDATIONS FOR ARTICLE 12

Relevant 2023 GREVIO recommendations that should be reiterated:

- call on the authorities to address the gendered nature and structural causes of violence against women, challenge attitudes and social norms that justify or perpetuate violence, promote women's empowerment, extend awareness-raising beyond domestic violence to all forms covered by the Convention, reach women exposed to intersectional discrimination and work in partnership with women's rights organisations. These elements were already expressly included in GREVIO's baseline recommendations.

Further specification proposed in light of the 2023 GREVIO findings and current developments:

- ensure that prevention measures systematically address psychological, economic, sexual and digital violence, stalking, sexual harassment and other less visible forms of violence, alongside domestic violence;
- develop sustained prevention programmes engaging men and boys in challenging discriminatory gender norms, male control and social acceptance of violence;
- ensure targeted and accessible prevention for women and girls exposed to intersectional discrimination, including through appropriate languages, formats and outreach;
- connect prevention more systematically with women's economic, social and political empowerment.

Additional recommendations based on the current findings:

- GREVIO should call on the authorities to establish a functioning national prevention framework linking the preventive responsibilities of all relevant institutions through common priorities, target groups, geographical coverage, dedicated resources and measurable outcomes, and to introduce baseline and follow-up measurement of changes in knowledge, attitudes and behaviour. This responds to ESE's current finding that preventive activities remain institutionally fragmented and that no functioning system exists for measuring their combined impact.

- GREVIO should call for prevention planning to be systematically informed by data from the protection and support system, so that interventions are prioritised in areas with lower reporting, weaker access to protection and services, and greater barriers for particular groups of women.
- GREVIO should call on the Ministry of Social Policy, Demography and Youth to establish an integrated prevention programme bringing together its responsibilities for awareness-raising, professional training, prevention in pre-school institutions and perpetrator programmes, so that these interventions are planned, implemented, monitored, evaluated and improved as mutually reinforcing components of a single prevention approach.

ARTICLE 14: EDUCATION

GREVIO 2023 baseline findings and subsequent developments

GREVIO welcomed the introduction of prevention-related content in primary and secondary education and efforts to revise curricula, textbooks and sexuality education. It nevertheless called for continuous implementation across all levels of education and age-appropriate education on equality, non-stereotyped gender roles, mutual respect, personal integrity and non-violent conflict resolution.

Since 2023, useful developments have continued, including new curricula, textbook-assessment criteria addressing equality and non-discrimination, new teaching materials and content concerning personal boundaries, digital safety and violence prevention. These developments are concentrated predominantly in primary and secondary education and do not yet amount to a coherent educational prevention pathway from early childhood through higher and adult education.

Question 10. Prevention through formal education

Pre-school prevention remains a significant gap. Although the legal framework requires prevention to begin in pre-school institutions, no systematic national programme has been established. Regular co-operation between the social-policy and education sectors on equality, non-violent communication, respect for diversity and elimination of gender stereotypes in early childhood education remains insufficient, as does systematic training of pre-school staff.

Primary and secondary education show the clearest progress, but coverage remains incomplete. Available information does not demonstrate consistent and mandatory coverage throughout the education process of freely given consent, bodily autonomy, harmful gender stereotypes, the gendered nature of violence and all forms of violence under the Convention.

Adult and higher education remain insufficiently addressed. Prevention content is not systematically integrated into adult education, while higher education remains particularly important for future professionals in medicine, law, social work, psychology and education who may later work directly with women and children experiencing violence.

Digital literacy should more clearly address gendered online violence. General internet safety is increasingly included in education, but this should be complemented by systematic education on online sexual harassment, technology-facilitated stalking and coercive control, non-consensual sharing of intimate material and other gendered forms of digital abuse.

Education professionals are not systematically prepared to deliver prevention or identify violence. Initial and continuous professional education remains uneven, limiting both teachers' capacity to transmit prevention content and their ability to recognise children experiencing or witnessing violence

and refer them appropriately. Institutional findings similarly show that training of educational staff has not yet been organised as a systematic continuous process.

RECOMMENDATIONS - ARTICLE 14

Relevant 2023 GREVIO recommendations that should be reiterated:

- Reiterate its 2023 recommendation to continue implementing Article 14 at all levels of education, including through continued revision of textbooks and curricula to eliminate discriminatory and stereotypical content and through promotion of gender equality, non-stereotyped gender roles, mutual respect and non-violent conflict resolution in non-formal education and other educational settings.

Further specification proposed in light of the 2023 GREVIO findings and current developments:

- ensure a continuous educational prevention pathway from pre-school through primary, secondary, adult and higher education;
- systematically include age-appropriate content on personal integrity, bodily autonomy, freely given consent, harmful gender stereotypes and all relevant forms of violence against women, including their digital dimension;
- establish systematic prevention programmes in pre-school education and initial and continuous education for staff working with children;
- strengthen prevention in adult and higher education, particularly in disciplines preparing future professionals who will work with women and children;
- ensure systematic initial and continuous education of teachers and other education professionals and tailored interventions for girls exposed to intersectional discrimination.

Additional recommendations based on the current findings:

- GREVIO should call for systematic evaluation of educational prevention, measuring changes in children's and young people's knowledge and attitudes concerning equality, consent, stereotypes, respectful relationships and violence, rather than monitoring only curricula, materials and numbers of participants.

ARTICLE 15: TRAINING OF PROFESSIONALS

GREVIO 2023 baseline findings and developments

GREVIO found that systematic and mandatory initial and in-service training had not been institutionalised for all relevant professional groups. Training focused predominantly on domestic violence and did not sufficiently address other forms of violence, their gendered dynamics, victims' rights and needs or prevention of secondary victimisation. GREVIO also noted that the statutory system for continuous professional education and the register of trained persons had not been fully implemented.

Since then, relevant steps have been taken. A register has been regulated, training modules developed, a group of 33 professionals certified and a range of basic, regional, multisectoral and e-learning activities implemented. These developments provide a useful foundation, but they do not yet demonstrate that the statutory system of mandatory initial and continuous professional education is fully operational.

Questions 11 and 12 – Initial and in-service training and involvement of women's rights organisations

Training is not planned as a national professional-development system. There has been no comprehensive mapping of the professional groups requiring basic or specialised education, previous training is not systematically consolidated, and annual and multiannual targets concerning coverage, frequency, territorial distribution and trainer capacity have not been established. Consequently, individual training activities cannot demonstrate that all practitioners who may encounter women experiencing violence are adequately prepared.

Coverage remains uneven between professional groups. The most visible recent progress concerns social protection and multisectoral teams. Comparable systematic coverage is not demonstrated for police officers, healthcare professionals, legal-aid providers, local-government staff and other practitioners.

The health sector illustrates the practical consequences particularly clearly. Many women who have not formally reported violence nevertheless have repeated contact with healthcare professionals because of its physical or psychological consequences. ESE's institutional analysis identifies limited training of primary healthcare professionals in recognising different forms of violence, available protection mechanisms and referral pathways. Where violence is not identified, health services may repeatedly treat its consequences without addressing the underlying cause.

Training content does not consistently address the gendered dynamics of violence. ESE's continuous professional engagement identifies recurring difficulties in understanding coercive control, dependency, trauma and the reasons women may remain in or return to abusive relationships. Psychological, economic, sexual and digital violence also remain insufficiently recognised. Such limitations affect communication, assessment, referral and prevention of secondary victimisation.

Training impact is not systematically evaluated. Numbers of trainings and participants indicate activity, but not whether professional knowledge, attitudes and practice improve. A common methodology is needed to assess changes in recognition of violence, communication with women, risk assessment, referral, investigation and judicial practice.

Question 12. Expertise of women's rights organisations

There are positive examples of specialist women's organisations contributing to training and multisectoral capacity building. However, their participation is not established as a regular component of institutional professional-education systems. Their contribution is particularly important because direct work with women provides evidence on barriers between formal procedures and practice, secondary victimisation, inappropriate communication, referral failures and obstacles faced by women exposed to intersectional discrimination. Their involvement should therefore extend beyond individual donor-supported projects to the design, delivery and evaluation of institutional training.

RECOMMENDATIONS - ARTICLE 15

Relevant 2023 GREVIO recommendations that should be reiterated:

- that all professionals dealing with victims or perpetrators receive systematic and mandatory initial and in-service training covering all forms of violence against women, including their digital dimension, the gendered and psychological dynamics of violence, victims' rights, safety and empowerment and prevention of secondary victimisation.
- that professional education be developed in close co-operation with independent women's CSOs providing specialist support, by requiring their regular and adequately resourced involvement in the design, delivery and evaluation of institutional training programmes, rather than participation being dependent on individual projects or partnerships.

Further specification proposed in light of the 2023 GREVIO findings and current developments:

- fully operationalise the statutory system of initial and continuous professional education rather than relying on individual training activities;
- map the number and profiles of professionals requiring basic and specialised training and establish minimum content, frequency, annual and multiannual coverage targets and territorial coverage for each relevant professional group;
- prioritise professionals who are likely to constitute a first point of contact, particularly police officers, social workers, primary healthcare professionals and legal-aid providers;
- ensure induction, refresher training and structured mentoring for newly recruited staff so that specialised institutional knowledge is not lost through staff turnover;
- extend GREVIO's previous call for evaluation of knowledge gained through training to systematic assessment of changes in professional attitudes and practice, including recognition of violence, communication with women, referral, risk assessment and prevention of secondary victimisation.

ARTICLE 16: PREVENTIVE INTERVENTION AND TREATMENT PROGRAMMES

GREVIO 2023 baseline findings

GREVIO identified serious shortcomings in programmes for perpetrators of domestic violence. Although several counselling centres formally existed, practical availability was extremely limited, trained counsellors were few and programmes were not available in custodial settings. The number of perpetrators ordered to treatment was also very low compared with the number of protection orders.

GREVIO called for expanded geographical availability, sustainable financing, adequate staffing, integration within local multi-agency structures and independent evaluation of programme outcomes. It also found that the earlier programme for perpetrators of sexual violence had not developed into a functioning system in prison, probation or the community.

Developments since the baseline evaluation

The State report refers to referral arrangements, professional standards and specialised counselling in the Skopje region. These are relevant developments, but it does not provide a national overview demonstrating a substantial increase in the number, capacity or geographical availability of programmes since 2023. Nor does it provide evidence that programmes for perpetrators of sexual violence have been established or expanded.

Questions 13 and 14 – Availability, standards, victim safety and evaluation

Availability remains insufficient and cannot be properly assessed. Information is lacking on the total number of functioning programmes, their locations, staffing, treatment capacity, waiting periods and number of available places. Formal referral possibilities cannot ensure effective access where programmes and trained staff are unavailable.

Participation is insufficiently documented. There are no consolidated data distinguishing voluntary and mandatory referrals, persons referred, persons admitted, persons starting treatment, persons completing programmes and persons discontinuing. It is therefore not possible to determine whether actual participation has increased.

Programmes for perpetrators of sexual violence remain a major gap. Available information does not demonstrate a functioning system covering prison, probation and, where appropriate, community settings. GREVIO's previous recommendation therefore remains largely outstanding.

Common standards and victim-safety arrangements require stronger oversight. The State report states that programmes address violence dynamics, perpetrator responsibility and prevention of repeated victimisation and that treatment is separate from victim services. These are important principles. However, available information does not demonstrate that all providers operate under consistently supervised standards or that formal co-operation with independent specialist women's services is embedded in every programme. Participation in or completion of a programme should not itself be treated as evidence that the risk to the woman or children has ended.

Programme effectiveness is not independently evaluated. Existing reporting primarily monitors attendance or compliance with measures. This is not equivalent to evaluating whether treatment reduces repeated violence, produces sustained behavioural and attitudinal change, improves victim safety or reduces reoffending after completion.

RECOMMENDATIONS - ARTICLE 16

Relevant 2023 GREVIO recommendations that should be reiterated:

- improve the availability and territorial coverage of intervention and treatment programmes for perpetrators of domestic violence, including outpatient and custodial programmes, with sustainable financing and adequate staffing;
- ensure their integration into local multi-agency structures and close co-operation with specialist women's support organisations;
- subject perpetrator programmes to independent evaluation;
- expand specialised intervention and treatment programmes for perpetrators of sexual violence, with the aim of preventing reoffending.

Further specification proposed in light of the 2023 GREVIO findings and current developments:

- establish national planning of programme capacity based on territorial needs, expected numbers of referrals and available specialised staff;
- ensure that all providers apply common standards based on a gendered understanding of violence, perpetrator responsibility and sustained behavioural change;
- formally embed victim-safety arrangements and systematic co-operation with independent specialist women's services in every programme;
- ensure that participation in or completion of a perpetrator programme is not treated, in itself, as evidence that risk to the woman or children has ended;
- ensure that independent evaluation assesses repeated violence, sustained behavioural and attitudinal change, victim safety and reoffending after programme completion.

In addition, GREVIO should call on the authorities to establish consolidated national data collection distinguishing voluntary and mandatory referrals and recording referral, admission, commencement, completion and discontinuation of treatment. Without these data, it is not possible to determine whether actual access and participation have increased since the baseline evaluation.

ARTICLE 18: GENERAL OBLIGATIONS

GREVIO 2023 baseline findings

GREVIO welcomed the legal basis for multi-agency co-operation introduced by the 2021 Law, including the establishment of multisectoral teams involving Centres for Social Work, police, healthcare institutions and civil society organisations. However, it found that co-operation remained largely focused on domestic violence, was not consistently operationalised, and did not systematically involve all relevant authorities and specialist women's organisations. GREVIO also identified the lack of mandatory operational protocols and guidelines, limited capacity of Centres for Social Work and the absence of a genuine one-stop-shop approach. It called for integrated, victim-centred multi-agency structures covering all forms of violence against women and prioritising women's safety, empowerment and prevention of secondary victimisation.

Developments since the baseline evaluation. The adoption of the 2023 Protocol on inter-institutional co-operation strengthened the formal framework for co-ordinated protection and support. However, implementation remains inconsistent. ESE's monitoring identifies delayed or incomplete information exchange, uneven functioning of multisectoral teams, insufficient involvement of specialist women's organisations and gaps in continuity between immediate protection and longer-term recovery. Statutory safeguards against revictimisation are not consistently applied, partly because of inadequate human, technical and spatial resources. The system also remains predominantly oriented towards domestic violence, while co-ordinated responses to other forms of violence are less developed. No genuine nationwide one-stop-shop model has been established.

Question 15. Multi-agency co-operation mechanisms.

The 2021 Law provides a legal basis for multi-agency co-operation in the protection and support of women victims of gender-based violence and domestic violence. It provides for multisectoral professional teams and assigns responsibilities to Centres for Social Work, the police, healthcare institutions and civil society organisations in assessing needs, preparing safety plans and co-ordinating assistance. The adoption of the 2023 Protocol on inter-institutional co-operation represents an additional development intended to strengthen and operationalise co-operation among the institutions and services involved in the response.

Formal framework has not translated into consistent multi-agency practice. However, ESE's long-term monitoring indicates that the existence of this legal and policy framework has not resulted in consistent and effective multi-agency co-operation throughout the country. The main deficiencies concern inconsistent implementation of safeguards against revictimisation, insufficient and delayed information exchange between institutions, insufficient functionality of multisectoral teams, uneven participation of the responsible institutions and civil society organisations, inadequate resources and insufficient continuity between immediate protection, support and women's longer-term recovery.

a. State agencies involved and functioning of multi-agency co-operation

Insufficient information exchange and co-ordination between institutions. Insufficient information exchange and co-ordination between the police and Centres for Social Work occur at several stages of the protection process. The problem concerns both the timeliness and completeness of information exchanged and directly affects the continuity of protection and support provided to women. At the stage of reporting violence, the police are legally required to notify the competent Centre for Social Work. In practice, this obligation is implemented inconsistently. In some police departments, information is transmitted periodically, including on a monthly basis, rather than promptly after a case is reported. As a result, Centres for Social Work may become aware of cases only after a considerable

delay, limiting their ability to promptly assess the woman's needs and initiate appropriate protection and support measures. The scope of notification also differs between police departments. While some notify Centres for Social Work of all reported cases, in other areas notification is limited primarily to cases classified as criminal offences, excluding misdemeanours and complaints, although these categories account for more than 80% of the cases recorded by the police.

At the stage of proposing and implementing the emergency protection measure of removal from the home and prohibition of approaching the victim, the police obligation to notify the Centre for Social Work is likewise not consistently implemented. Where the Centre is not informed that the police have proposed the emergency measure to the court or that the measure is being implemented, a multisectoral professional team may not be established. Consequently, additional protection and support measures necessary to address the identified risk are not jointly planned and co-ordinated.

Similar shortcomings occur during the implementation of temporary protection measures. These measures are generally proposed by the Centre for Social Work, while responsibility for implementing individual measures is assigned to different institutions, including the police. The Centre for Social Work is responsible for monitoring the implementation and effects of all imposed measures, which requires regular and timely communication with the institutions responsible for their execution. Although the police have an obligation to provide information on the implementation of measures within their competence, this exchange is not consistently maintained. This limits the ability of Centres for Social Work to assess whether the measures are being effectively implemented and whether they should be continued, modified or terminated.

These shortcomings demonstrate that the problem is not limited to isolated failures of communication, but concerns the continuity of inter-institutional co-operation throughout the protection process, from the initial report, through emergency intervention, to the implementation and monitoring of protection measures. Delayed, incomplete or absent information interrupts the institutional chain of protection and prevent a timely and co-ordinated response to women's needs. Beyond these inconsistencies in the implementation of existing notification obligations, the legal framework does not provide for sufficiently integrated inter-institutional co-operation at the stage of risk assessment and risk management. Gaps in co-ordination between the authorities responsible for assessing risk and those competent to take measures to address it further weaken the continuity of the protection response. These deficiencies are examined in greater detail under Article 51.

Insufficient functionality of multisectoral professional teams. The functioning of multisectoral professional teams remains inconsistent. Their establishment and effective operation depend on timely information exchange, availability of representatives of the relevant institutions and clear implementation of the responsibilities assigned to each actor. Practitioners have identified cases in which healthcare professionals invited by Centres for Social Work to participate in multisectoral teams declined to participate because they did not consider their legal obligation sufficiently clear. Difficulties have also been identified where the police representative involved in the team is the uniformed officer who initially responded to the incident but is subsequently unavailable for continued participation because of other assigned duties. These circumstances weaken continuity in the work of the team and its ability to jointly assess the situation, plan necessary measures and follow their implementation. The problem is therefore not merely whether a multisectoral team is formally established, but whether all relevant institutions participate continuously and whether the team functions as an effective case-management mechanism throughout the period in which the woman and her children require protection and support.

b. Participation of specialist support services provided by civil society organisations

Insufficient involvement of civil society organisations. Although civil society organisations are formally recognised as participants in multisectoral co-operation, their involvement is not systematically ensured throughout the country. The experience of CSOs providing support to women indicates that Centres for Social Work have not established a consistent nationwide practice of involving them in multisectoral professional teams. The systematic involvement of specialist women's organisations is particularly important because of their direct and often continuous contact with women experiencing violence and their knowledge of women's safety concerns, practical barriers to accessing protection, available specialist services and the broader social and economic consequences of violence. Their participation should therefore form a regular component of safety and support planning rather than depend on individual institutional practice or existing project-based co-operation.

c. Gender-sensitive, safety-oriented and victim-centred approach

Insufficient implementation of legally prescribed measures against revictimisation. From the first contact with the competent institutions, the measures aimed at protecting women from further victimisation and revictimisation, as stipulated in Article 44 of the Law, are not consistently implemented in practice. Article 44 of the 2021 Law requires competent institutions, within their respective mandates, to protect the identity and personal data of victims; take statements at the place of reporting; enable, with the victim's prior consent, video and audio recording of statements taken by the police or public prosecutor for use as evidence; conduct interviews in specially adapted premises; limit confrontation with the reported perpetrator; and limit the number of statements given by the victim during the protection procedure.

According to practitioners from Centres for Social Work and the police, the main obstacle to the implementation of the statutory safeguards against revictimisation is the lack of adequate human, technical and spatial resources within these institutions, which represent the main entry points into the protection system. In practice, these safeguards are not systematically ensured. Centres for Social Work report that insufficient human resources, equipment and appropriate premises restrict their ability to implement measures intended to prevent revictimisation. Interviews are not consistently conducted in separate rooms adapted for work with victims, and practices have been identified where several professionals are present during the interview, which may reduce women's willingness to disclose relevant details of the violence. The same concern extends to criminal proceedings. The possibility of taking the victim's statement through video and audio recording for subsequent use as evidence is not systematically applied by the Public Prosecutor's Office. As a result, women are required to recount the violence repeatedly before different professionals and institutions, despite the legal safeguards specifically intended to reduce repeated questioning, unnecessary exposure and secondary victimisation.

These shortcomings demonstrate a continuing gap between the legal obligation to protect women from revictimisation and its implementation in practice. The implementation of the specific procedural safeguards is examined in greater detail under Article 56.

Practices inconsistent with a victim-centred approach. ESE's monitoring has also identified practices in which access to assistance and support is effectively linked to women's willingness to report violence or pursue particular proceedings. In some cases, women approaching Centres for Social Work have been instructed to first report the violence to the police before the Centre continues its intervention. A further practice has been identified where, following notification by the police, a case is subsequently recorded by the Centre for Social Work as "disturbed family relations" where the woman

does not consent to proceedings for temporary protection measures, despite the case having been registered by the police as domestic violence.

There are also cases in which domestic violence is approached through methodologies applicable to disturbed marital or family relations, including referral of women to counselling on parenting or family relations together with the perpetrator and their children. Such practices fail to adequately recognise the unequal position of the victim and perpetrator, risk further traumatisation and may compromise women's safety. Protection and support should not be conditional on reporting violence to another institution, initiation of proceedings or the woman's willingness to pursue a specific legal measure. Women are also not consistently sufficiently informed about their rights, available protection mechanisms and support services. Insufficiently sensitive communication, limited efforts to build trust and failure to provide explanations that women can fully understand may further weaken their ability to make informed decisions concerning their protection.

Insufficient connection between immediate protection, support and women's recovery. The protection system remains insufficiently connected with measures necessary for women's longer-term recovery and economic independence. For example, CSW may refer women to Employment Centres, but there is no established mechanism requiring systematic feedback on what support was offered, which employment measures were used or whether the woman subsequently obtained employment. Consequently, referral does not necessarily result in continued institutional follow-up, and immediate protection and support measures remain insufficiently connected with interventions aimed at women's economic empowerment and sustainable recovery. Women leaving violent relationships frequently face simultaneous problems related to income, employment, housing, childcare, health and legal proceedings. A victim-centred multi-agency response therefore requires not only immediate safety measures but also continuity between protection and the general and specialist services needed for recovery. These issues are addressed in greater detail under Articles 20 and 22.

Insufficient multi-agency response to all forms of violence against women. The practical operation of the protection system remains predominantly centred on domestic violence. Difficulties in recognising psychological, economic, sexual and digital forms of gender-based violence among practitioners also limit the likelihood that these cases will activate a comprehensive and co-ordinated institutional response. The multi-agency framework should therefore be operationalised for all forms of violence covered by the Istanbul Convention, with referral and co-operation arrangements adapted to the specific protection, healthcare, forensic, psychosocial and legal needs associated with different forms of violence.

d. Financial and human resources dedicated to implementation

Resource constraints affecting protection and multi-agency co-operation. Insufficient financial, human and technical resources constitute an underlying obstacle to effective implementation of the protection framework. The expansion of the responsibilities of Centres for Social Work following the adoption of the 2021 Law was not accompanied by a corresponding increase in staffing and institutional capacity. CSWs, despite their central role in the protection and support system, continue to face high workloads and insufficient specialised personnel.

These constraints affect the implementation of individual legal obligations, the prevention of revictimisation, timely work with women, monitoring of protection measures and the ability of practitioners to participate continuously in multisectoral case management. Resource limitations therefore affect not only the functioning of individual institutions but the capacity of the entire multi-agency protection mechanism to provide timely and continuous assistance.

e. Evaluation of outcomes and impact

Absence of systematic assessment of outcomes and impact. There is no systematic mechanism for assessing whether multi-agency co-operation improves the actual safety, protection and recovery of women. The existence of protocols, multisectoral teams and training activities does not in itself demonstrate that the institutional response has become more effective. Monitoring should assess whether co-operation results in timely protection, reduced repeated violence, fewer repeated interviews and referrals, improved continuity of support, access to necessary services, increased economic independence and improved satisfaction of women with the institutional response. The State report provides information on the Protocol and multisectoral training activities, but this does not demonstrate the outcomes achieved for women through the functioning of the multi-agency system.

Legal and policy basis for multi-agency co-operation. The legal and policy basis for multi-agency co-operation is established by the 2021 Law and further operationalised through the 2023 Protocol. The principal deficiency is therefore no longer the absence of a formal framework, but its inconsistent implementation. The shortcomings described above demonstrate the need for clearer operational responsibilities, institutional accountability and consistent application across all forms of violence against women.

Question 17. One-stop-shop approach. The current system cannot be characterised as a genuine one-stop-shop model. It remains based primarily on referrals between separate institutions and services, requiring women to navigate Centres for Social Work, police, healthcare, courts, legal assistance and other services separately. Information exchange, feedback after referral and continuity between immediate protection and longer-term recovery remain insufficient. No nationwide physical or virtual integrated point of entry has been established.

RECOMMENDATIONS – ARTICLE 18

Relevant 2023 GREVIO recommendations that should be reiterated:

To expand and strengthen integrated multi-agency co-operation structures for the protection and support of victims of all forms of violence covered by the Istanbul Convention, involving all relevant actors, including specialist women's support services.

To develop and ensure the consistent implementation of mandatory guidelines and/or protocols for relevant professionals responding to all forms of violence against women on the basis of multi-agency co-operation. Such guidelines and protocols should be based on a gendered understanding of violence against women, prioritise women's human rights and safety, promote their empowerment and economic independence, and prevent secondary victimisation.

Further specification proposed in light of the 2023 GREVIO findings and current developments:

On multi-agency co-operation by calling on all institutions covered by the 2021 Law and the 2023 Protocol to translate their co-operation obligations into clear and consistently implemented internal procedures. These should establish designated responsible staff and contact points, immediate and complete notification between institutions, timely exchange of information, continuous institutional representation in multisectoral teams, systematic involvement of specialist women's organisations, follow-up of agreed measures, and mechanisms for supervision and accountability where obligations are not fulfilled.

On a victim-centred response by ensuring that access to protection and support is not conditional on prior reporting to the police, initiation of proceedings or a woman's willingness to pursue a particular protection measure. Cases involving domestic violence should not be reframed as "disturbed family relations", and women should not be referred to joint family or parental counselling with perpetrators where domestic violence has been identified.

On effective multi-agency structures by requiring adequate human, technical and spatial resources, particularly for Centres for Social Work, so that institutions can ensure timely intervention, effective safeguards against revictimisation, continuous participation in multisectoral case management and monitoring of protection and support measures.

On integrated multi-agency support by ensuring continuity between immediate protection and women's longer-term recovery, including effective links with healthcare, housing, employment, legal assistance, psychosocial support and economic empowerment, with systematic follow-up after referral.

On integrated multi-agency structures by calling on the authorities to assess the establishment of accessible regional integrated points of entry/one-stop-shop models through which women can obtain co-ordinated protection and support, while reducing repeated referrals, repeated questioning and the burden placed on women to navigate separate institutional systems.

Additional recommendation based on the current findings:

GREVIO to call on the authorities to establish systematic outcome-based monitoring of multi-agency co-operation, assessing not only the existence of protocols, multisectoral teams and training activities, but their actual results for women, including timely protection, reduction of repeated violence and revictimisation, continuity of support, access to necessary services, safety, autonomy, economic recovery and women's satisfaction with the institutional response.

ARTICLE 20 – GENERAL SUPPORT SERVICES

GREVIO 2023 baseline findings. GREVIO identified significant shortcomings in women's access to the general services necessary for recovery and economic independence. Centres for Social Work were understaffed and insufficiently resourced, while housing, employment and reintegration measures did not adequately enable women to rebuild independent lives. Women exposed to intersectional discrimination faced additional barriers. In healthcare, GREVIO identified a major structural gap: the absence of a national protocol ensuring standardised identification, treatment, documentation and referral for all forms of violence against women. It also raised concerns about healthcare costs, requirements linked to prior reporting and unequal access for marginalised groups.

Developments since the baseline evaluation. The available evidence does not demonstrate the establishment of an integrated recovery pathway linking protection with income, employment, housing, healthcare, legal assistance and support for children. ESE's findings show that women continue to bear a substantial share of the economic consequences of violence through lost income, healthcare and housing expenditure, legal costs and debt, while State financial assistance reaches relatively few women. Long-term housing solutions remain particularly limited and employment measures are insufficiently linked to individual recovery. In healthcare, the 2023 Intersectoral Cooperation Protocol improved the framework for referral, but no dedicated national health-sector protocol establishing standardised nationwide healthcare pathways has been adopted.

Question 18 – recovery through general support services

Alongside protection from further violence, women need support that enables them to recover and establish an independent life after leaving an abusive relationship. This includes access to adequate housing, healthcare, financial assistance, legal support, employment and economic empowerment.

Fundamentally, the common thread linking all these needs is the financial and economic situation of women after leaving an abusive relationship. Violence itself generates additional costs, while at the same time frequently reducing women's income and employment opportunities. ESE's findings show that these economic consequences are cumulative rather than isolated. The same woman may simultaneously experience loss of employment or income, healthcare expenditure, relocation and housing costs, legal expenses and increased responsibility for the everyday costs of children. The financial impact of violence therefore often continues long after the immediate violence has ended.

Securing housing, addressing health consequences, resolving legal problems and covering the everyday needs of children all require sufficient and stable financial resources.

Recovery services remain fragmented and insufficiently responsive to the economic consequences of violence. However, the economic dimension of recovery remains largely neglected in the State response. Women are to a considerable extent left to secure the basic conditions for themselves and their children precisely during the period in which violence has generated additional needs, costs and economic insecurity.

General systems of social protection, healthcare, employment, housing and access to justice either do not sufficiently recognise the specific needs arising from violence or provide measures that are insufficient, difficult to access or inadequately connected with one another. Even where specific legal rights exist, their implementation remains uneven and women continue to bear a significant part of the financial consequences themselves. Practically, the State fails both to ensure effective protection against further violence and to provide a connected pathway toward economic stabilisation, recovery and women's long-term independence. Economic insecurity is both a key factor that can make it significantly more difficult for women to leave abusive relationships and, for those who do leave, a major barrier to their overall recovery, rebuilding their lives and achieving long-term independence.

Key economic and existential barriers to recovery and independent living.

ESE's analysis confirms that women themselves and their families absorb a substantial part of the economic consequences of domestic violence. State support covers only a limited part of these costs and is accessed by very few women. As a result, employment income, private borrowing, parental and family support and women's own assets frequently substitute for an adequate public recovery system. This is particularly important for the implementation of Article 20. Recovery cannot be assessed only by whether individual services formally exist. It requires examining whether women can actually secure sufficient income, healthcare, housing, legal protection and support for their children without becoming indebted or economically dependent on relatives or the perpetrator.

Based on ESE's analyses with women survivors and long-term monitoring of the State response, six interrelated findings stand out regarding the economic situation of women survivors of domestic violence.

1. Domestic violence results in substantial employment-related losses and long-term economic insecurity. Domestic violence affects women's economic situation not only through additional costs, but also by limiting employment opportunities, reducing income and restricting professional

development. In ESE's 2026 Analysis on costs incurred as a result of domestic violence⁵, 24 out of 49 women (49%) reported that the perpetrator had banned or attempted to prevent them from working. For one quarter of these women, this resulted in actual exclusion from the labour market, as they did not work. The remaining women continued to work or seek employment despite the perpetrator's opposition and pressure, which nevertheless constituted direct interference with their economic autonomy. Almost one third of the women, 15 out of 49 had lost their job as a direct result of domestic violence. The estimated lost income resulting from job loss alone amounted to approximately MKD 236,600 per affected woman during the previous 12 months. The consequences extend beyond job loss. Women reported prolonged absence from work, reduced income, missed career opportunities, forced acceptance of lower-paid jobs and movement into informal and insecure employment. These negative effects often persist long after separation, with women with lower qualifications or interrupted employment histories facing particular disadvantages. At the same time, employment and economic empowerment measures are not sufficiently connected with the recovery process. In the programmes and active employment measures of the Ministry of Economy and Labour, victims of gender-based and domestic violence are specifically recognised in only two measures: self-employment and subsidised employment. These measures are not systematically adapted to the consequences of violence, such as trauma, interrupted employment histories, prolonged unemployment, reduced confidence or the need for flexible working arrangements. Clear legal obligations regulating the manner and frequency of communication and co-ordination between Centres for Social Work and Employment Centres are missing. There is no established mechanism for an integrated approach linking women's personal recovery with their professional and economic development. In practice, Centres for Social Work may refer women to Employment Centres, but they do not systematically receive feedback on whether the woman was included in an employment measure, what support she received, whether she found employment or whether she started generating income. Referral is therefore often treated as the end of the intervention rather than as part of a co-ordinated recovery pathway.

The formal availability of self-employment or subsidised employment measures is not sufficient. Economic empowerment measures cannot be effective if they are offered in isolation from the broader recovery process. A woman who is still coping with trauma and the consequences of violence, without adequate housing, healthcare, psychosocial support, legal assistance and financial security, cannot reasonably be expected to successfully participate in entrepreneurship training, prepare a business plan or establish and sustain a business.

2. Housing insecurity after leaving violence. Long-term housing is one of the priority needs of women survivors of gender-based and domestic violence, as it provides the stability, safety and independence necessary for recovery and an independent life. The absence of a systemic long-term housing solution is therefore not only a gap in social policy, but a significant obstacle to women's safety, recovery and ability to establish and maintain an independent life after violence. Leaving the shared home frequently creates an urgent need to secure alternative accommodation for both the woman and her children at a time when her income may already have been reduced as a consequence of the violence. ESE's latest analysis demonstrates the scale of this problem. Two thirds of the women (33 out of 49) changed their place of residence after leaving the abusive relationship. Of those who moved, 16 went to live with their parents, seven rented accommodation, only two moved into a home they personally owned, while seven relied on several successive or temporary housing arrangements. These findings show that leaving violence does not automatically result in safe and sustainable housing. Women often depend on parents or other family members, move between temporary arrangements or rent

⁵ [ESE, Analysis on costs incurred as a result of domestic violence, 2026](#)

accommodation that they may struggle to afford. In some cases, women temporarily return to the shared home because they do not have a viable alternative. Housing also generates substantial direct costs precisely when women are trying to establish an independent life. Twelve women reported relocation and housing-related costs amounting to MKD 1,382,500 in total, or approximately MKD 115,200 per affected woman. These included rent, relocation and transport, furniture and household equipment and other expenses associated with establishing a new household. The absence of direct expenditure among other women does not mean that their housing needs were resolved without cost; in many cases, the financial burden was instead absorbed by their parents or other family members. Existing State support is focused primarily on temporary accommodation as a protection measure. Shelters provide immediate protection, but without long-term housing solutions, women may remain in insecure living conditions, continue to depend on others or face pressure to return to the perpetrator.

There is no systemic mechanism providing long-term housing or housing support to women after leaving a shelter or an abusive household. Women survivors of gender-based and domestic violence are not recognised as a separate category of beneficiaries of Government social housing or other social housing schemes for socially vulnerable groups. For women with low or unstable incomes, rent, utilities and the costs of maintaining an independent household may make independent living financially unsustainable and prolong economic dependence after separation.

2.1. Long-term housing requires a pathway beyond emergency accommodation. Building on ESE's empirical findings, the legal and comparative analysis undertaken with the Edinburgh International Justice Initiative (EIJI)⁶ places women's post-separation housing needs within the broader right to adequate housing. The analysis draws an important distinction between emergency accommodation and sustainable housing: while Article 23 of the Istanbul Convention primarily addresses immediate safe accommodation through shelters, broader international and European housing standards require attention to accessibility, affordability and security of tenure⁷.

Under Article 11(1) of the ICESCR and the interpretation developed by the UN Committee on Economic, Social and Cultural Rights, adequate housing is not limited to the availability of a physical dwelling. Accessibility, affordability and legal security of tenure are integral elements of adequate housing, while housing policies should take particular account of disadvantaged groups. The European Social Charter similarly requires measures to promote access to adequate housing, prevent homelessness and make housing affordable to persons without sufficient resources.[4] Applied to women leaving abusive relationships, these standards reinforce the need for recovery measures that extend beyond temporary shelter and enable women to secure stable and affordable housing over time.

Comparative practice demonstrates different pathways towards housing independence. EIJI's comparative review of Austria, Slovenia and Serbia identifies several approaches that may inform the development of a longer-term housing response in North Macedonia. These models do not rely on a single form of assistance but combine measures enabling women, where safe and appropriate, to

⁶ For the purposes of this Shadow Report and ESE's advocacy on national and international level.

⁷ Edinburgh International Justice Initiative (EIJI) and Association for Emancipation, Solidarity and Equality of Women (ESE), *Sustainable Long-Term Housing for Survivors of Domestic Violence in North Macedonia: Legal, Policy and Empirical Analysis*, Research Report, 6 March 2026, pp. 12–17. See also International Covenant on Economic, Social and Cultural Rights, Art. 11(1); UN Committee on Economic, Social and Cultural Rights, General Comment No. 4; European Social Charter, Art. 31.

remain in their existing home with mechanisms supporting transition to independent accommodation where this is not possible⁸.

Austria and Slovenia provide legal mechanisms allowing the perpetrator, rather than the victim, to be removed from the shared residence. Austria additionally uses transitional apartments, generally provided at municipal level, which allow women who cannot safely remain at home to move from emergency protection towards independent living while continuing to receive psychosocial support. Slovenia combines mechanisms enabling women to remain in the family home with priority access for victims of domestic violence to non-profit housing⁹.

The comparative analysis therefore points to a continuum of housing responses: maintaining the woman safely in the existing home where possible; providing transitional accommodation where an immediate move is necessary; and creating preferential pathways into affordable or social housing for longer-term independence. Such an approach would address the gap between emergency shelter and fully independent housing that currently characterises the response in North Macedonia.

3. Healthcare costs and financial barriers to recovery. ESE's 2025 analysis of costs¹⁰ incurred as a result of domestic violence demonstrates that the health consequences of violence create a substantial additional financial burden for women survivors. The analysis covered 52 women who had used ESE's Legal Aid Centre between May 2023 and June 2024 and examined medication, primary and specialist healthcare, psychological support and hospitalisation costs.

Of the 52 women, 44 had health insurance and eight were uninsured. Among the uninsured women, loss of insurance was in some cases linked to dependence on the perpetrator's insurance: the spouse had either failed to pay contributions or withheld consent for continued use of his insurance after separation. Although the Health Insurance Law formally recognises victims of domestic violence as entitled to compulsory health insurance, the analysis found that no by-law had been adopted specifying the practical procedure for exercising this entitlement. Healthcare expenditure was significant and covered a wide range of needs. Thirty-three women used medication, with total annual medication expenditure of MKD 159,200 and an average of MKD 4,824 per woman. Women also required extensive primary and specialist care. Twenty-six women used specialist healthcare services, accounting for 229 visits, with psychiatric services being the most frequently used. Thirty-one women visited a psychologist, while 11 women required hospitalisation. The total reported healthcare costs borne by the women amounted to MKD 334,220. Medication represented the largest share, accounting for 48% of total healthcare expenditure, followed by hospitalisation at 21%. Primary healthcare represented 19%, while specialist healthcare and psychologist visits each accounted for 6%. The financial burden was substantially higher for uninsured women. On average, uninsured women incurred healthcare costs of MKD 13,219, compared with MKD 5,193 among insured women. Healthcare costs represented approximately 17% of average monthly income among insured women, while for uninsured women they amounted to 147% of average monthly income. The difference was particularly pronounced for hospitalisation, where uninsured women paid an average of MKD 25,000 compared with MKD 2,422 among insured women. Mental healthcare also presents a particular challenge. Psychiatric services were the most frequently used specialist service, and 60% of the women had visited a psychologist. However, the analysis notes that psychological support may require long-

⁸ EIJ and ESE, *Sustainable Long-Term Housing for Survivors of Domestic Violence in North Macedonia*, pp. 28–37, comparative analysis of Austria, Slovenia and Serbia and assessment of transferable practices.

⁹ Ibid., Austria comparative analysis, pp. 28–30, concerning transitional apartments and continued psychosocial support during the transition towards independent living.

¹⁰ [ESE, Analysis of costs incurred as a result of domestic violence, 2025](#)

term engagement and that costs not covered by the Health Insurance Fund may force women to discontinue treatment. Existing financial assistance does not adequately respond to these needs. Although the Law on Social Protection provides one-off financial assistance of up to MKD 12,000 for healthcare and medical treatment, only eight of the 52 women received such assistance. None of the seven women who experienced psychological violence without physical injury received assistance, and only three of the eight uninsured women benefited. The analysis also found little correspondence between the actual level of healthcare expenditure and the allocation of assistance. The analysis therefore shows that the health consequences of domestic violence are not only a medical issue but an important component of women's economic insecurity after violence. Where access to health insurance, affordable medication, mental healthcare and financial assistance is inadequate, women themselves absorb a substantial part of the costs of treating the consequences of violence, directly undermining their recovery and economic independence.

4. Limited State financial support leaves women dependent on debt and family resources. The existing modalities of State financial support are neither easily accessible nor sufficient to meet the needs of women and their children after leaving an abusive relationship. The Social Protection Law recognises women survivors of domestic violence as beneficiaries of one-off financial assistance of up to MKD 15,000 for urgent protection and accommodation and MKD 12,000 for healthcare and medical treatment. In practice, however, very few women use this support. Of the 47 women in ESE's analysis who had contacted a Centre for Social Work, only four, or 8%, had been offered and received financial assistance related to the violence. Practitioners also reported insufficient awareness among some social workers of women's entitlement to this support. Women survivors of domestic violence may also have facilitated access to guaranteed minimum assistance, with the perpetrator's income excluded from household-income calculations. Access is nevertheless limited because many women do not meet the general eligibility criteria and because formal divorce may be required before the woman is treated independently from the perpetrator's household. Moreover, these specific forms of financial support are provided for domestic-violence survivors but not systematically for women affected by other forms of gender-based violence. The consequences are visible in women's actual capacity to absorb the financial impact of violence. Only one of 49 women reported being able to fully cover the costs resulting from domestic violence. Twenty-eight could cover only part of the costs, mainly food and basic living needs, while 19 could not cover them at all. Importantly, many of the women unable to meet these costs were employed, demonstrating that employment alone does not guarantee financial security after violence. Women therefore relied heavily on private resources: 29 used bank loans, 20 received financial assistance from parents, 18 used inheritance, 12 relied on relatives and eight on friends. Almost two thirds used two or more financing sources. Loans taken to cover rent, relocation, household expenses, legal costs, food and other consequences of violence may remain a burden for years after separation. Reliance on parents and relatives effectively transfers part of the economic cost of violence to the wider family. In practice, private debt, family resources and inheritance compensate for the absence of adequate and accessible State financial support. Rather than mitigating the economic consequences of violence, the current system leaves women and their families to absorb a substantial part of these costs themselves, prolonging women's financial insecurity well beyond the end of the abusive relationship.

5. Financial barriers prevent women from resolving violence-related legal problems. Resolving violence-related legal problems is an essential part of establishing an independent life after an abusive relationship. Women frequently face several interrelated legal problems requiring separate or successive proceedings, including temporary protection measures, divorce, custody, child support,

property division and compensation. ESE's analysis¹¹ shows that limited financial resources affect not only how women conduct proceedings but also which legal problems they are able to resolve at all. In practice, women are forced to prioritise proceedings they consider unavoidable for immediate safety and continuation of everyday life, particularly protection measures, divorce, custody and child support while property division, compensation and other claims important for long-term economic security are more likely to remain unresolved. Although basic court fees are relatively low, the overall cost of litigation may include legal representation, expert assessments, administrative expenses and the risk of being ordered to reimburse the other party's costs. These costs are difficult to predict and may be unaffordable for women with limited or unstable income.

Formal mechanisms for free legal aid and exemption from court costs exist, but they are rarely used in practice and do not consistently ensure that all costs necessary for effective access to court are covered. The problem is therefore broader than affordability of an individual court fee. Financial barriers influence whether women can initiate proceedings, whether they can obtain the necessary evidence and representation, and ultimately whether they can resolve the legal and economic consequences of violence. This means that women may obtain legal separation and regulate immediate issues concerning their children while property, compensation and other economic claims remain unresolved for years. Financial barriers therefore limit not only women's access to justice, but also their ability to resolve the economic consequences of violence and establish an independent life after leaving the abusive relationship.

EIJI's housing analysis further highlights that access to independent housing is affected not only by the cost of obtaining new accommodation but also by women's ability to recover their share of existing family assets. Delays in property division may leave women without access to resources invested in the former family home precisely when they need capital to secure alternative housing. The analysis therefore recommends that property and related financial claims with a direct bearing on housing stability be dealt with without unnecessary delay and that women's unpaid domestic and care contributions be adequately taken into account in property settlements¹². [7]

6. Inadequate and poorly enforced child support transfers a disproportionate share of the cost of raising children onto women. Economic insecurity after separation is further deepened by inadequate and irregular payment of child support. Court-awarded child support frequently does not fully reflect children's actual needs, while legal remedies for increasing the amount are rarely used because of financial barriers, fear of retaliation, continued abuse through the children and insufficient legal support. Around two thirds of women experience delayed, partial or complete non-payment of child support, while more than one third receive no payment despite the existence of a court decision. The period between separation and the court decision further increases women's financial burden. The average period is approximately 250 days, during which women largely bear the costs of supporting the children themselves, while this period is not subsequently compensated through retroactive child support. Irregular or non-payment affects women's ability to predict and cover essential expenditure for food, housing, utilities, clothing, healthcare, education and other needs of the children. It also prolongs the economic relationship between the woman and the former partner and may provide an additional means through which economic control continues after separation. In practice, inadequate

¹¹ [ESE, The Price of Justice: The Impact of Court Costs and Free Legal Aid on Access to Justice for Women Survivors of Domestic Violence, 2026](#)

¹² EIJI and ESE, *Sustainable Long-Term Housing for Survivors of Domestic Violence in North Macedonia.*, Strategic Recommendations, pp. 47–49, concerning expedited property-related claims, recognition of unpaid domestic and care work and independent-living pathways.

child support, delays in awarding it and ineffective enforcement transfer a disproportionate share of the cost and responsibility for raising children to women precisely during the period when they are attempting to recover from violence and establish an independent household. The absence of an effective State mechanism to ensure timely payment means that the consequences of non-payment are borne by women and their children rather than by the parent who fails to comply with the court decision.

Comparative analysis points to mechanisms for shifting the burden of enforcement from women to the State. Building on ESE’s empirical findings, a comparative legal analysis (for the purposes of this Shadow Report and ESE’s advocacy on national and international level) was undertaken by the Edinburgh International Justice Initiative (EIJI) examined child-maintenance systems in several European jurisdictions in order to identify institutional mechanisms capable of addressing inadequate, delayed and unpaid maintenance. The analysis is particularly relevant from the perspective of Article 20 because it demonstrates that the financial consequences of non-payment do not necessarily have to remain with the woman and the children while enforcement proceedings are pursued¹³.

The comparative analysis identifies several approaches through which the State can assume a more active role in securing continuity of child maintenance. These include centralised administrative mechanisms for calculation, collection and monitoring of maintenance payments; automatic income or benefit deductions; and State advance or substitute-payment schemes under which children continue to receive a minimum level of support when the liable parent fails to pay. Such arrangements reduce reliance on repeated enforcement action by the custodial parent and protect the child’s household from the immediate financial consequences of non-payment.

Particularly relevant for women survivors of domestic violence are models of financial intermediation, under which maintenance payments are transferred through a public agency rather than directly between the parents. EIJI’s analysis of the French system highlights mandatory intermediation in domestic-violence cases as a mechanism for eliminating direct financial contact and reducing the possibility that maintenance payments are used as a means of post-separation control¹⁴. EIJI also identifies State-backed substitute or guaranteed maintenance as a mechanism for separating the child’s immediate entitlement to financial support from the success of enforcement against the debtor. In Slovenia, for example, the Maintenance Fund can provide substitute maintenance following non-payment, after which the State assumes responsibility for pursuing recovery from the debtor. Since 2022, access to this substitute payment no longer requires the custodial parent first to complete enforcement proceedings¹⁵. These comparative models are relevant to North Macedonia not because they establish a single required institutional solution, but because they demonstrate feasible ways of addressing the structural problem documented by ESE: under the present system, the woman and the children continue to bear the immediate consequences of inadequate or unpaid maintenance while the woman herself must initiate and pursue the available legal remedies.

Questions specific to the public health sector

Questions 19 and 20 – standardised healthcare response

¹³ Edinburgh International Justice Initiative (EIJI), *Comparative Analysis on Child Alimony and Adjudication*, 2026

¹⁴ EIJI, *ESE: Alimony and Adjudication*, pp. 49–52

¹⁵ EIJI, *ESE: Alimony and Adjudication*, pp. 56–59

No standardised nationwide healthcare pathway has been established. A standardised nationwide healthcare pathway has still not been established. GREVIO's key recommendation was the introduction of a national healthcare protocol covering identification and screening, treatment, documentation and referral; however, no such protocol has been adopted since the 2023 baseline evaluation, and GREVIO's recommendation therefore remains unimplemented. The 2023 Intersectoral Cooperation Protocol may improve referral and communication between institutions, but this is conceptually different from a health-sector clinical and operational protocol specifying what healthcare professionals must do when a woman presents with possible signs or consequences of violence. The available information therefore does not demonstrate nationwide standardised procedures requiring health professionals to: systematically identify possible victims through appropriate screening; assess and respond to physical and psychological healthcare needs in a supportive and trauma-sensitive manner; document injuries and preserve relevant evidence according to common standards; communicate clearly to the woman that violence is unacceptable and that support is available; systematically refer her to appropriate specialist services; and identify children who may have been exposed to domestic violence and need additional support. The continuing importance of such procedures is illustrated by ESE's 2025 analysis. One third of the women interviewed did not seek healthcare despite possible needs, including women who suffered both physical and psychological violence. The analysis itself notes that healthcare utilisation may be affected not only by medical need but also by barriers to access. The central issue is therefore no longer whether healthcare institutions are formally part of the multisectoral system, but whether every woman entering the health system can expect the same standardised, gender-sensitive response regardless of where she seeks care.

Question 21 – Documentation and collection of forensic evidence

No uniform nationwide procedure for health-sector documentation and forensic evidence collection. The Law on Prevention and Protection from Violence against Women and Domestic Violence provides for free examination and medical treatment, documentation of injuries, collection of evidence and issuance of medical documentation. However, the available information does not demonstrate the existence of a uniform nationwide healthcare procedure governing how health professionals should document and collect forensic evidence in cases of domestic violence, sexual violence and female genital mutilation. This distinction is important. The 2026 State report provides information under Article 25 on criminal forensic procedures in sexual-violence cases, indicating that the public prosecutor directs the collection and securing of forensic evidence and that healthcare and forensic-medicine services may be involved. However, this does not answer the broader Question 21 concerning standardised procedures to be followed by public healthcare actors themselves when victims initially present for healthcare. For domestic violence, ESE's analysis also demonstrates that medical documentation and healthcare access may entail out-of-pocket costs, despite the statutory entitlement to free healthcare. It identified, for example, cases where services that should have been covered or free nevertheless generated payments.

Question 22 – Equal and barrier-free access to healthcare

Formal entitlement has not resulted in equal access in practice. ESE's 2025 findings demonstrate a significant gap related to health-insurance status. Eight of the 52 women interviewed were uninsured. Some had lost dependent insurance after separation because the perpetrator had failed to pay contributions or withheld consent for continued insurance coverage. The practical consequences are substantial. Uninsured women incurred average healthcare expenditure of MKD 13,219 compared with MKD 5,193 among insured women, and their healthcare costs exceeded their average monthly income.

Although the Health Insurance Law recognises domestic-violence victims as entitled to compulsory health insurance, the analysis found no by-law specifying the procedure through which women can exercise this entitlement. The Ministry of Health's programme for exemption from participation fees also presents accessibility barriers. According to ESE's analysis, women were required to provide a police report in order to benefit from the exemption. The Ministry did not maintain centralised data on either the number of beneficiaries or actual expenditure, and implementation information was dispersed among individual healthcare institutions. This is particularly problematic because GREVIO expressly recommended that medical assistance and documentation be provided free of charge regardless of whether violence has been reported to the authorities.

The State report refers generally to outreach measures targeting Roma women, rural women, women belonging to ethnic minorities and women with disabilities. However, it does not provide sufficient evidence demonstrating that the specific legal, financial, physical, communication and administrative barriers identified by GREVIO have been systematically removed. Equal access must therefore be assessed not only by formal entitlement to use public healthcare, but by whether women can actually obtain the necessary examination, treatment, medication and documentation without prior reporting requirements, unaffordable costs or accessibility barriers.

Question 23 – Women in institutions and closed reception facilities

Insufficient information on identification, protection and referral in institutional settings. There is insufficient information to assess implementation of Question 23. The State report does not provide a substantive response identifying specific screening procedures, trained personnel, reporting mechanisms, referral pathways or safety arrangements for women experiencing violence in institutions for persons with disabilities, residential facilities for older persons or closed reception facilities for asylum seekers. The absence of information is itself relevant from a monitoring perspective: the authorities should be requested to provide evidence of whether institutional healthcare and care providers have specific procedures for identifying violence, enabling confidential disclosure, ensuring immediate safety and referring women to appropriate protection and specialist services.

Question 24 – Informed consent to sterilisation and abortion

Insufficient information on safeguards for free and informed consent. The 2026 State report does not provide substantive information on measures ensuring that women with disabilities, Roma women and women from other ethnic communities, migrant women and intersex persons receive accessible information, understand the proposed medical procedure and freely consent to sterilisation or abortion.

RECOMMENDATIONS – ARTICLE 20

Relevant 2023 GREVIO recommendations that should be reiterated:

To provide adequate human and financial resources to Centres for Social Work so that they can effectively discharge their responsibilities, and to ensure appropriate training of social workers on the gendered nature and consequences of violence against women, including the specific needs of women exposed to intersectional discrimination.

To improve women victims' access to services supporting their autonomy and to implement dedicated measures in the areas of employment, vocational training and housing that contribute to recovery, economic independence and empowerment.

GREVIO to reiterate its 2023 recommendation concerning healthcare services, in particular to:

- ensure that medical assistance and medical documentation are provided free of charge to women victims of all forms of violence covered by the Convention, regardless of whether the violence has been reported to the authorities;
- introduce a national protocol for healthcare professionals establishing standardised care pathways for all forms of violence against women, including identification and screening, diagnosis, treatment, documentation of injuries and referral to appropriate specialist services;
- institutionalise co-operation between the healthcare sector and specialist support services; and
- ensure equal and barrier-free access to healthcare for all women victims of gender-based violence, without discrimination.
- GREVIO to reiterate its relevant 2023 recommendation on informed consent to ensure that women with disabilities undergoing sterilisation receive sufficient information in an accessible form and are supported by professionals appropriately trained on gender and disability issues.

Further specification proposed in light of the 2023 GREVIO findings and current developments:

On women's autonomy and economic independence by calling for an integrated recovery pathway connecting social protection, employment, housing, healthcare, psychosocial support, legal assistance and financial support. Referral between services should include systematic follow-up and feedback, rather than constituting the end of institutional intervention.

Concerning employment and economic empowerment by requiring employment measures to be adapted to the consequences of violence, including trauma, interrupted employment histories, prolonged unemployment and the need for flexible arrangements, and by establishing systematic co-ordination and follow-up between Centres for Social Work and Employment Centres.

Concerning housing by calling for sustainable long-term housing solutions in addition to emergency accommodation, including access to social housing, rental support and other forms of housing assistance enabling women and their children to establish an independent household after leaving violence.

Concerning recovery and economic independence by ensuring that financial assistance available to women victims is accessible, adequate and responsive to the actual economic consequences of violence, including healthcare, relocation and basic living costs, and that relevant forms of support are not limited in practice to victims of domestic violence while excluding women affected by other forms of gender-based violence.

Healthcare recommendation by requiring the authorities to remove practical and administrative barriers to exercising existing healthcare entitlements, including any requirement to provide proof of prior reporting; adopt the necessary procedures for women victims to exercise their entitlement to compulsory health insurance; and ensure effective monitoring of exemptions, healthcare expenditure and access to treatment.

On standardised healthcare pathways by ensuring that the national health-sector protocol establishes uniform procedures for medical documentation and collection and preservation of relevant forensic evidence when women first present to healthcare services, covering domestic violence, sexual violence and other relevant forms of violence against women.

On informed consent by ensuring accessible information and genuinely free and informed consent not only for women with disabilities undergoing sterilisation, but also in relation to sterilisation and abortion for all groups of women and girls who may face particular communication, discrimination or

accessibility barriers, including Roma and other minority women, migrant women and intersex persons.

Additional recommendations based on the current findings:

GREVIO to call on the authorities to establish specific procedures for identifying and responding to violence against women in institutional and closed settings, including institutions for persons with disabilities, residential facilities for older persons and closed reception facilities for asylum seekers. Such procedures should provide for confidential disclosure, trained personnel, immediate safety measures and effective referral to protection and specialist support services.

GREVIO to call on the authorities to systematically monitor the accessibility and outcomes of general support services for women victims of violence, including uptake and unmet need in relation to financial assistance, employment measures, housing, healthcare and other recovery services, disaggregated where relevant by form of violence and groups exposed to intersectional discrimination.

GREVIO to call on the authorities to address the longer-term financial consequences of violence as an integral component of recovery, including the cumulative impact of loss of employment and income, healthcare and housing costs, debt, violence-related legal costs and the financial consequences of delayed, inadequate or unpaid child support.

Recommendations informed by comparative practice:

Consider establishing a State-backed mechanism that ensures continuity of child-maintenance payments where the obligated parent fails to pay, with responsibility for subsequent recovery transferred to the competent public authority rather than remaining with the custodial parent.

Consider establishing a centralised mechanism for monitoring, collection and enforcement of maintenance payments, supported by effective information exchange between courts, employers, tax authorities, social-protection institutions and other relevant bodies.

In cases involving domestic violence, introduce financial intermediation arrangements that prevent the maintenance obligation from requiring direct financial contact between the woman and the perpetrator and reduce opportunities for post-separation economic control.

Enforcement mechanisms should, as far as possible, operate proactively and automatically following persistent non-payment, rather than requiring women repeatedly to initiate separate enforcement proceedings. Recognise women survivors of domestic violence as a distinct priority category within social and affordable housing schemes, with eligibility criteria that reflect the housing and economic consequences of leaving an abusive relationship.

Develop time-bound rental and utility support extending beyond one-off emergency assistance, in order to bridge the period between separation and sustainable economic independence.

Develop transitional housing arrangements at local level for women who no longer require emergency shelter but are not yet able to secure sustainable independent accommodation, combining housing with access to psychosocial and other recovery support.

Establish partnerships between municipalities, housing providers and specialist women's organisations to facilitate access to housing and to provide practical transition support, including deposits, essential household goods and other initial costs of establishing an independent household.

Ensure that housing-related support provided through Centres for Social Work is based on women's actual housing and financial needs and is not limited to women accommodated in shelters.

ARTICLE 22 – SPECIALIST SUPPORT SERVICES

GREVIO 2023 baseline findings

GREVIO found that specialist services were concentrated predominantly on domestic violence, while specialised responses to other forms of violence against women remained insufficient. Geographic coverage was uneven, particularly outside Skopje and for women in rural areas, and services were not consistently adapted to women exposed to intersectional discrimination. GREVIO emphasised the essential role of specialist women's organisations but noted that their capacity and outreach were undermined by insufficient and predominantly project-based funding. It called for low-threshold, victim-centred and empowering specialist services covering all forms of violence and for their adequate geographic distribution and sustainable financing.

Developments since the baseline evaluation

There have been some positive developments, including the opening of the first shelter in the Polog region in 2024, licensing of additional civil society service providers and measures targeting Roma women, rural women and women with disabilities. Nevertheless, the structural shortcomings identified by GREVIO largely remain. Specialist services are still geographically uneven and predominantly focused on domestic violence; long-term trauma care, outreach and socio-economic recovery services remain particularly limited. Public shelters and counselling services face staffing constraints, while specialist women's organisations continue to provide a substantial part of legal, psychological, psychosocial, outreach and reintegration support. Licensing has not been matched by predictable institutional financing, with public funding generally covering selected services rather than the full organisational capacity required to sustain them.

Question 25 – Availability and type of specialist support services

Structural gaps in specialist service availability remain. These are relevant developments, particularly the improvement in geographical shelter coverage. However, they have not resolved the structural problems identified by GREVIO. Specialist services remain: geographically uneven, with limited access in many parts of the country; predominantly focused on domestic violence, alongside separate specialised services for victims of trafficking, and insufficiently developed for several other forms of violence covered by the Convention; insufficiently staffed in parts of the public system, particularly shelters and counselling services; particularly limited in long-term trauma care, outreach and socio-economic recovery and reintegration; and heavily dependent on specialist women's organisations whose institutional sustainability is not adequately financed.

These concerns are also confirmed by the 2025 performance audit of the State Audit Office, which found inadequate geographical coverage and staffing of specialist services and noted that the absence of a cost analysis prevented an assessment of whether the resources allocated were sufficient to ensure quality service provision.

Licensing has not been accompanied by sustainable institutional financing. A central weakness is the financing model for specialist services provided by civil society organisations. Although a number of women's organisations are now licensed service providers, public funding is linked primarily to the provision of specific recognised services. It does not provide institutional or core support for maintaining the organisations that make those services possible. Moreover, only part of the actual support provided to women is recognised and financed. For example, financing of one CSO may cover psychological counselling while other support services provided, such as legal aid, accompaniment, case co-ordination and others are not financially compensated. The experience of CSO providers, shows that State financing connected with such service provision represents less than 20% of the

overall budgets of the organisations concerned. Some organisations have additionally faced delays and irregularities in receiving payments from the competent ministry. This creates a fundamental sustainability problem. Specialist organisations must maintain trained staff, premises, administration and organisational capacity irrespective of the number of individual services reimbursed.

a. Shelters and other forms of safe accommodation

Shelter coverage, specialised staffing and practical accessibility remain insufficient.

The opening of the first shelter in the Polog region in 2024 represents an improvement in geographic coverage. Nevertheless, the overall number and distribution of shelters remain insufficient, particularly when considering the need to provide services for all forms of violence covered by the Convention, rather than domestic violence alone. The State report itself presents the Polog facility as addressing a previously identified geographic gap.

The problem is not limited to the number of available beds. Shelters operated through Centres for Social Work often lack dedicated specialised staff. The professionals expected to provide support in shelters are already responsible for a broad range of regular duties within the Centres for Social Work, while shelter-related work is added on top of their existing workload. Practitioners have raised concerns that they are required to divide their time between their regular responsibilities and providing support in shelter facilities that are physically located elsewhere. As a result, continuous and specialised support during women's stay cannot always be ensured. In practice, shelter provision may therefore be reduced largely to meeting immediate needs for accommodation, food and physical safety, rather than providing the broader psychological, legal, social and economic support necessary for recovery, empowerment and transition to independent living.

Practical eligibility and operating arrangements may also restrict access. For example, employed women may face difficulties using certain shelters where strict confidentiality and security arrangements limit their ability to leave the premises for work. This illustrates a broader problem: safe accommodation must be organised around women's recovery and continued autonomy, rather than requiring women to choose between physical protection and maintaining employment or other essential aspects of everyday life.

Shelter provision also remains primarily designed for domestic-violence survivors. Comparable safe accommodation for women affected by other forms of gender-based violence is considerably less developed.

GREVIO had already called for more shelters, adequate geographic distribution, access without mandatory prior reporting or referral, sufficient staff and sustainable funding.

b. Short- and long-term psychological counselling

Psychological counselling remains geographically uneven and understaffed. Access to specialised psychological counselling remains geographically uneven. Although counselling services have formally been established and equipped within a number of Centres for Social Work, in practice several are not fully operational because of shortages of specialised personnel. In practice, the specialised counselling service in Skopje is the principal consistently functioning public service of this type, and it focuses on domestic violence. Specialist women's organisations also provide psychological and psychosocial support, but they are themselves concentrated in Skopje and several other locations. Consequently, women in many parts of the country do not have regular access to specialised short- and particularly long-term psychological counselling. Open Gate/La Strada provides both individual and group psychological and psychosocial assistance to women and girls who are victims or presumed victims of

trafficking. Support focuses on emotional recovery, coping with traumatic experiences, strengthening self-confidence and personal and social skills and may continue after the woman leaves specialised accommodation. The existence of such specialised NGO services represents important expertise, but it does not amount to nationwide access to psychological support across all forms of violence against women.

Legal counselling

Formal legal-aid mechanisms do not ensure effective access to comprehensive legal support. Access to comprehensive legal assistance is a critical need for women survivors of gender-based and domestic violence, because leaving an abusive relationship usually triggers a series of interconnected legal problems that must be resolved before a woman can safely and independently continue her life. ESE's 2026 analysis confirms that women frequently need to pursue several proceedings simultaneously or consecutively – including temporary protection measures, divorce, child custody and child support, so that the financial and psychological burden accumulates rather than being confined to a single procedure. Civil society organisations are an important source of such specialist legal assistance. Under the Law on Free Legal Aid, authorised CSOs may provide primary legal aid, including initial legal advice, general legal information and assistance in applying for secondary legal aid. However, the scope of this support is limited and the public financial resources available for its provision are very small. The legal framework provides secondary legal aid, including legal representation and coverage of court costs, for persons meeting the relevant financial criteria. Women survivors of domestic violence are specifically entitled to secondary legal aid without a means test only in proceedings for temporary protection measures. In other proceedings connected with violence – including divorce, custody, child support, property division and compensation – they must satisfy the general financial and property criteria.

In practice, secondary legal aid is almost unused. In ESE's 2026 analysis, none of the women involved in temporary protection proceedings used secondary legal aid through the Ministry of Justice; only 2 of 29 women in divorce proceedings used it; and none of the women in child-support or custody proceedings did so.

A major problem is lack of information about the available legal mechanisms. Some women are not sufficiently informed that they may be entitled to secondary legal aid, while the application procedure is perceived as complex and administratively burdensome. Women may also be formally excluded because they are employed or own property, even where their actual economic situation does not allow them to bear the costs of proceedings. In temporary protection proceedings, access to secondary legal aid may additionally depend on obtaining confirmation of victim status from the Centre for Social Work, creating a further administrative barrier and possible delay, particularly where psychological or economic violence is less readily recognised. **Women are similarly poorly informed about the possibility of being exempted from court fees and other procedural costs.** ESE's analysis found that none of the women in temporary protection proceedings had requested an exemption, while only 3 of 37 women in divorce proceedings had requested or intended to request one. Among women in temporary protection proceedings, 13 of 18 did not know that they could request an exemption from court costs; in divorce proceedings, 18 of 29 were not fully informed of this possibility, and one third of women involved in child-support proceedings were unaware of it. **Even where an exemption is requested, it may be only partial and may not cover all expenses.** This is significant because the real financial burden extends beyond court fees to expert assessments, lawyers' fees, administrative expenses and the risk of being ordered to cover costs of the opposing party. ESE's analysis found, for example, that 10 of 39 women in divorce proceedings could not afford expert-assessment costs, while

a further 23 could not say whether they would be able to pay them; 5 of 7 women in custody proceedings could not afford a lawyer.

Specialist women's organisations therefore often provide significantly broader assistance than the formal free legal aid system. ESE has operated its Legal Aid Centre for women survivors of domestic violence since 2002. The Centre provides legal counselling, prepares lawsuits, appeals and other written submissions, and provides court representation. Assistance covers proceedings directly related to protection from violence, including criminal proceedings and civil proceedings for temporary protection measures, as well as interconnected legal problems such as divorce, child custody, child support, property-related issues and other family-law matters.

This comprehensive approach is essential because these are not secondary or peripheral problems. ESE's analysis shows that women prioritise proceedings necessary for immediate safety and for regulating their lives with their children, while proceedings that could improve their longer-term economic position, such as property division or compensation, are pursued much less frequently, in part because of limited financial capacity, procedural complexity and the additional psychological burden.

Open Gate/La Strada provides legal information and counselling to victims of trafficking, assists them in understanding and exercising their rights and facilitates communication with competent institutions and legal professionals where further representation is required.

There is therefore a substantial gap between the formal existence of legal aid and cost-exemption mechanisms and women's ability to use them in practice. Lack of information, restrictive eligibility criteria, administrative barriers and uncertainty about court costs substantially weaken access to justice. Without timely information and effective access to comprehensive secondary legal aid covering the full range of violence-related legal problems, many women remain unable to resolve the legal consequences of violence and establish an independent life after leaving an abusive relationship.

Telephone helplines

Nationwide accessible helpline coverage for all forms of violence has not been established. Telephone helplines continue to provide an important point of access to information, counselling and referral. The State report refers to capacity-building and training for SOS helpline operators, but does not demonstrate that nationwide helpline coverage has been established for all forms of violence covered by the Convention. GREVIO had previously identified limitations in language accessibility, accessibility for women with disabilities and the predominance of domestic violence within the scope of existing helpline support. In the field of trafficking, Open Gate/La Strada operates the free and confidential national SOS Helpline 0800 11 111, providing information, counselling, initial identification and referral of potential victims of trafficking. The trafficking helpline is therefore a specialised mechanism for that specific form of exploitation, but it should not be treated as evidence that comparable specialist telephone support is available for all other forms of violence against women.

Medical support, trauma care and outreach

Specialist medical support, long-term trauma-informed care and proactive outreach remain underdeveloped and are not systematically available nationwide or across all forms of violence against women. Existing specialised services, including the Sexual Violence Referral Centres and trafficking-specific CSO models, provide important forms of support but do not amount to a comprehensive nationwide specialist-service system.

Other forms of specialist support

Socio-economic recovery and reintegration remain fragmented and project-based. Socio-economic recovery and empowerment remain insufficiently developed. There is no systematic nationwide specialist service providing a comprehensive pathway from protection to longer-term economic recovery for women victims of violence. Individual organisations implement employment, education, vocational training and economic-empowerment activities, but these are predominantly project-based and dependent on donor financing rather than embedded in a sustainable public specialist-service system. Specialised online support is also provided by civil society organisations. Since 2020, ESE has operated pobarajsovet.mk – “Ask for Advice”, a specialised platform providing free legal information and individual advice to women survivors of domestic violence, including on protection, divorce, child custody, child support and property issues. Open Gate/La Strada provides a more comprehensive reintegration pathway for victims of trafficking, including case management, psychosocial assistance, education and vocational support, employment assistance, socialisation and community inclusion, family support, reintegration planning and follow-up. Its model is particularly relevant because it connects identification and immediate protection with recovery and reintegration, rather than treating each service as an isolated intervention. These examples demonstrate important specialist expertise within civil society, but similar integrated and sustainably financed long-term support is not systematically available nationwide to women affected by domestic violence and the other forms of violence covered by the Convention.

Specialist services remain strongly dependent on civil society. The evidence across the different categories of services points to one overarching structural issue. Women’s organisations provide many of the most specialised, victim-centred and continuous forms of assistance, including psychological counselling, legal support, accompaniment, case management, outreach, helplines and reintegration support. Yet their institutional sustainability is not secured through the current financing model. Licensing has enabled some organisations to enter the formal service system, but licensing without adequate and predictable core financing does not guarantee continuity of specialist services. This is particularly important because the public system does not currently provide an equivalent range of services. If specialist women’s organisations are unable to sustain their staff and institutional capacity, there is no public structure capable of simply replacing the services they provide.

Question 26. Specialist support for children exposed to domestic violence

No nationwide system of specialised psychological support for children exposed to domestic violence. Specialised psychological support for children exposed to domestic violence remains limited and geographically uneven. The available information does not demonstrate the existence of a nationwide system ensuring timely access to child psychologists or other professionals specifically trained to address the impact of domestic violence on children. Centres for Social Work remain the main public institutions responsible for the protection of child victims and witnesses, but there is insufficient evidence that they have the specialised human resources necessary to provide long-term, age-appropriate and trauma-informed psychological support. The 2026 State report does not identify which specialist services currently employ professionals specifically trained to work with children exposed to domestic violence, nor does it provide evidence of improved geographic availability of such support.

Specialised support remains concentrated in individual civil society services. Specialised assistance is available primarily through individual civil society organisations. Open Gate/La Strada provides an important example of child-centred and trauma-informed support. Approximately 60% of beneficiaries of its Direct Assistance Programme are underage girls who are victims or presumed victims of

trafficking and exploitation, many of whom have also experienced domestic violence, neglect or other forms of violence.

Through its Direct Assistance Programme and Counselling Centre, Open Gate provides psychological and psychosocial support to children and young people affected by trafficking, sexual and online exploitation, forced begging, forced or early marriage and other forms of violence. For children with more complex needs, longer-term psychotherapy and psychosocial support are available and adapted to the child's age, developmental needs, traumatic experiences and risk of re-victimisation. However, such services represent specialised CSO expertise rather than a systematic nationwide response for children exposed to domestic violence. Access to professionals trained in childhood trauma, domestic violence and multiple forms of violence remains particularly limited outside larger urban areas. Children who witness domestic violence are therefore not systematically guaranteed timely, long-term, geographically accessible and specialised psychological support.

Question 27. Specialist support for migrant, asylum-seeking, refugee and minority women and girls

No systematic nationwide specialist services adapted to migrant, asylum-seeking, refugee and minority women and girls. Specialist services adapted to the particular needs of migrant, asylum-seeking, refugee and minority women and girls remain insufficiently developed. Although general support programmes are formally available regardless of migration or protection status, the available information does not demonstrate the existence of a systematic nationwide network of specialist services addressing the specific legal, linguistic, social and practical barriers faced by these groups. The State report refers to strengthened psychosocial and legal services for Roma women, rural women and women with disabilities, including certain services provided in the mother tongue. However, it does not identify specialist services specifically designed for migrant, asylum-seeking or refugee women and girls. Nor are separate financial resources earmarked for these groups.

Specialised support remains concentrated mainly in the trafficking response. Specialised support is available mainly in relation to trafficking in human beings. Open Gate/La Strada provides assistance to migrant, asylum-seeking and refugee women and girls who are victims or presumed victims of trafficking through its Direct Assistance Programme, outreach and mobile work. Support includes identification and referral, individual case management, psychosocial assistance and support in accessing healthcare, social protection, legal assistance and other services. Where trafficking is identified or suspected, women and girls may be referred through the National Referral Mechanism. Experience from specialised CSO services nevertheless shows continuing barriers to identification and access to support. These include language and communication barriers, lack of information, insecure migration or socio-economic status, fear of authorities, dependence on others, stigma and discrimination. Identification may be particularly difficult where trafficking or exploitation occurred outside North Macedonia. Roma women and girls may similarly face intersecting barriers linked to poverty, social exclusion, discrimination and limited access to services. These factors can both increase vulnerability to violence and reduce the likelihood of accessing specialist support. Existing specialised CSO services therefore address some groups and forms of violence, particularly trafficking, but they do not amount to a systematic nationwide system adapted to migrant, asylum-seeking, refugee and minority women and girls experiencing the broader range of violence covered by the Convention.

RECOMMENDATIONS – ARTICLE 22

Relevant 2023 GREVIO recommendations that should be reiterated:

- to ensure the establishment and adequate geographic distribution of low-threshold specialist support services with expertise in all forms of violence against women, beyond domestic violence, based on a victim-centred and empowering approach, responsive to the needs of women exposed to intersectional discrimination, and drawing systematically on the long-standing expertise of specialist women's organisations.
- to ensure, through adequate and sustainable funding, the continued role of specialist women's organisations providing essential support to victims of all forms of violence against women, including through long-term and predictable financing that recognises their expertise, gendered approach and institutional capacity.
- concerning shelters by ensuring an adequate number and geographic distribution of accessible shelters; access irrespective of whether women report violence to the authorities, including the possibility of self-referral; adequate staffing and specialised training; sustainable financing; and quality standards based on a gendered, victim-centred and empowering approach.
- concerning national telephone helplines to ensure accessibility for women with disabilities, broaden their scope to all forms of violence covered by the Convention, provide counselling, advice and referral through appropriately trained staff, and ensure adequate and sustainable financing for their continuous operation.
- concerning children exposed to domestic violence to ensure long-term, tailored psychological counselling provided by professionals specifically trained on the impact of domestic violence on children, with adequate geographic distribution throughout the country.
- concerning women exposed to intersectional discrimination by ensuring non-discriminatory access to specialist support services, integrating the perspectives of migrant and asylum-seeking women, Roma women, women with disabilities and other groups facing intersecting disadvantages into the design and implementation of services, and ensuring that they are informed of their rights and available support.

Further specification proposed in light of the 2023 GREVIO findings and current developments:

- on sustainable specialist services by calling for predictable and multiannual financing of specialist women's organisations that covers not only individual reimbursed services but also the core institutional costs necessary to maintain specialised staff, premises, administration and continuity of service provision.
- on the scope and geographic availability of specialist services by ensuring nationwide access to the full range of specialist support, including long-term psychological and trauma-informed support, legal assistance, outreach, case management and socio-economic recovery, for women affected by all forms of violence covered by the Convention.
- concerning shelters by ensuring that safe accommodation provides more than emergency shelter and basic needs and includes continuous psychological, legal, social and economic support for recovery and transition to independent living. Shelter arrangements should not create practical barriers that require women, including employed women, to choose between safety and maintaining employment or other essential aspects of independent life.

- concerning children exposed to domestic violence by requiring systematic referral from Centres for Social Work and other relevant institutions to age-appropriate and trauma-informed psychological support, and by ensuring access to professionals specialised in childhood trauma and domestic violence also outside major urban areas.
- concerning migrant, asylum-seeking, refugee and minority women and girls by ensuring that specialist services address the specific barriers they face through qualified interpretation, accessible information, proactive outreach, strengthened identification and referral mechanisms, and sustainable support for specialist civil society organisations working with these groups.
- concerning specialist services for all forms of violence by ensuring that existing specialised models developed for particular forms of violence, including trafficking, are connected through effective referral pathways with other specialist services, while recognising that trafficking-specific services cannot substitute for dedicated support for women experiencing other forms of violence.

ARTICLE 25 – SUPPORT FOR VICTIMS OF SEXUAL VIOLENCE

GREVIO 2023 baseline findings

GREVIO welcomed the establishment of three Sexual Violence Referral Centres in Skopje, Kumanovo and Tetovo providing immediate medical care and forensic examination. However, it found that geographic coverage was insufficient, medium- and long-term psychological and trauma support was lacking, specialist referrals were not systematic and staff training was uneven. Utilisation of the centres was extremely low. GREVIO was particularly concerned that access to an official medical examination was linked in practice to reporting to the police and that forensic evidence could not be collected and stored while allowing victims time to decide whether to report. It called for additional referral and/or rape crisis centres, long-term support and removal of reporting-related barriers.

Developments since the baseline evaluation

The 2026 State report refers to training on trauma-informed and victim-oriented support and measures to strengthen referral and co-ordination between health, psychosocial and legal services. However, no additional Sexual Violence Referral Centres or rape crisis centres are identified, and no current annual utilisation data are provided. The gaps in geographic coverage and medium- and long-term trauma support therefore remain. The State describes forensic procedures once criminal proceedings are initiated, but does not demonstrate the introduction of a system allowing forensic evidence to be collected and stored independently of an immediate decision to report. It also remains unclear whether women can access the full range of services at the existing centres without police involvement.

Question 28 – Availability of specialist services

No expansion of dedicated sexual-violence services has been implemented.

The 2026 State report does not identify the establishment of any additional Sexual Violence Referral Centres or rape crisis centres (apart from the already established). Instead, it reports that the capacities of existing services were strengthened through training of professionals in the social protection, health and civil-society sectors and through measures aimed at improving referral and co-ordination between psychosocial, legal and health services.

These activities may improve the functioning of existing services, but they **do not address the fundamental gap identified by GREVIO: the absence of rape crisis centres providing confidential, specialised and long-term counselling and trauma support, and the insufficient geographic coverage of Sexual Violence Referral Centres.**

Trafficking services cannot substitute for dedicated sexual-violence services. Open Gate/La Strada provides specialised support to women and girls who are victims or presumed victims of trafficking, including those subjected to sexual exploitation and sexual violence. Through its specialised Centre for Victims of Trafficking and Direct Assistance Programme, it provides 24/7 protection, psychosocial and psychological assistance, case management and support for rehabilitation and reintegration, and facilitates access to medical, forensic and other specialised services. However, this is a **specialist trafficking service rather than a dedicated rape crisis service**, and cannot substitute for a nationwide system of specialist services specifically designed for victims of sexual violence. A further gap identified by Open Gate is that victims of trafficking who have experienced sexual exploitation or sexual violence are **not systematically referred to or do not sufficiently use the Sexual Violence Referral Centres**, indicating a need for stronger referral pathways between trafficking services and specialised sexual-violence services.

Question 29 – Number of services and women and girls supported

GREVIO already expressed concern in 2023 about the **very low use of the three existing Sexual Violence Referral Centres**. Between 2018 and 2021, only **37 victims of sexual violence received support through the three centres, of whom 27 were children**. GREVIO considered that the low uptake pointed to problems of trust, reporting procedures, secondary victimisation and insufficient awareness of the services.

Lack of current service-use data prevents assessment of actual access. The 2026 State report does **not provide the information specifically requested under Question 29**. It does not state the current number of Sexual Violence Referral Centres, whether additional centres have been established since the baseline evaluation, or how many women and girls have been supported annually. Instead, Question 29 is followed directly by the response concerning forensic evidence under Question 30. This is an important monitoring gap. Without annual data on the number of women and girls accessing each service, it is not possible to assess whether the very low utilisation identified by GREVIO has improved since 2023. Open Gate's Centre for Victims of Trafficking has capacity for up to six beneficiaries at a time and provides specialised support to trafficking victims, including victims of sexual exploitation. However, these figures should not be treated as utilisation data for sexual-violence services, because the Centre serves victims of different forms of trafficking and exploitation.

Question 30 – Collection and storage of forensic evidence

No system for collecting and storing forensic evidence independently of an immediate decision to report. The 2026 State report explains that forensic evidence is collected under the authority of the Public Prosecutor, that forensic units act immediately following the prosecutor's order, and that health institutions and forensic medicine services are involved where necessary. The Public Prosecutor determines the specific timeframes and instructions for collecting, processing and storing evidentiary material. However, this describes the handling of evidence once a criminal investigation is underway. It does not answer the central issue raised by GREVIO.

The State report does not specify: whether rape kits or other standardised sexual-assault evidence kits are used; how long forensic samples are retained; whether evidence can be collected and stored when the victim has not yet decided to report the offence; or whether a dedicated evidence-storage

procedure has been introduced in the Sexual Violence Referral Centres. Therefore, the 2026 State report does not demonstrate that GREVIO's recommendation to establish a system for collecting and storing forensic evidence independently of an immediate decision to report has been implemented.

Question 31 – Access criteria

This question requires a particularly careful distinction between access to criminal-justice procedures and access to specialist sexual-violence services.

Direct access to Sexual Violence Referral Centres without police involvement remains unclear. In its 2023 baseline evaluation, GREVIO found that women could not obtain an official medical examination at a Sexual Violence Referral Centre without reporting the sexual violence to the police. It considered this mandatory reporting requirement an important barrier to accessing medical and psychological support and recommended that services be available regardless of whether the victim wished to report the violence. The 2026 State report states that action by the competent authorities is not conditional on health-insurance status, residence status, citizenship, ethnicity, age or disability. It further states that urgent protection measures, securing forensic evidence and referral to health and other services are not conditional on a prior formal report. This would represent an important change if it also applies in practice to direct access to the Sexual Violence Referral Centres. However, the State response primarily describes access to police protection, investigative measures and forensic procedures, rather than clearly confirming that a woman can independently approach a Sexual Violence Referral Centre and receive medical examination, forensic examination, psychological assistance and other support without police involvement. Accordingly, the available information does not establish whether the specific barrier identified by GREVIO in 2023 has actually been removed in practice. The State report indicates that protection, evidence collection and referral are no longer formally dependent on a prior police report, but it does not demonstrate that women can independently access the full range of services provided by Sexual Violence Referral Centres without police involvement. The practical implementation of GREVIO's recommendation therefore remains unclear.

RECOMMENDATIONS – ARTICLE 25

Relevant 2023 GREVIO recommendations that should be reiterated:

- on establish rape crisis centres and/or additional Sexual Violence Referral Centres providing immediate medical care, forensic examination and trauma support, as well as immediate, short-term and long-term psychological assistance by qualified professionals trained in gender-based violence against women and victim-sensitive examination.
- on establish, in areas where no Sexual Violence Referral Centre or rape crisis centre exists, clear pathways for victims of rape and sexual violence ensuring swift access to forensic examination, trauma care, immediate, short-term and long-term psychological counselling and legal assistance provided by trained and specialised professionals.
- to identify and eliminate barriers preventing women victims of sexual violence from accessing Sexual Violence Referral Centres and to ensure that women are adequately informed about the existence and availability of these services.
- to introduce a system enabling forensic evidence to be collected and stored where a victim needs time to decide whether to report rape or sexual violence, without making preservation of such evidence dependent on the immediate initiation of criminal proceedings.

- on ensure that Sexual Violence Referral Centres systematically refer victims to specialist psychological counselling and trauma-care services and that women can receive the full range of services provided by these centres regardless of their willingness to report the violence to the authorities.
- on review the obligation imposed on professionals, including professionals working in Sexual Violence Referral Centres, to report violence against women, with a view to making reporting contingent on the victim's prior consent except in the limited circumstances identified by GREVIO.

Further specification proposed in light of the 2023 GREVIO findings and current developments:

- on geographic availability and accessibility by calling for a concrete plan to expand dedicated sexual-violence services beyond the three existing Sexual Violence Referral Centres, including dedicated rape crisis services offering confidential medium- and long-term psychological counselling and trauma-informed recovery support.
- concerning referral pathways by ensuring systematic co-operation and referral between Sexual Violence Referral Centres and other specialist services, including services for victims of trafficking who have experienced sexual exploitation or sexual violence, while recognising that trafficking-specific services cannot substitute for dedicated sexual-violence services.
- concerning forensic evidence by requiring clear nationwide operational procedures specifying the use of standardised sexual-assault evidence kits, responsibilities for collection and preservation of evidence, retention periods and arrangements for secure storage where a woman has not yet decided whether to report the offence.
- concerning access irrespective of reporting by requiring the authorities to clearly establish and communicate that women may directly access medical examination, forensic examination, crisis support and other services provided by Sexual Violence Referral Centres without prior police involvement or initiation of criminal proceedings.

Additional recommendation based on the current findings:

- GREVIO to call on the authorities to collect and publish annual data on the operation and use of each Sexual Violence Referral Centre and rape crisis service, including the number and age of women and girls supported, type of assistance provided, referrals made and geographic origin of beneficiaries, in order to assess whether the extremely low utilisation identified in the 2023 baseline evaluation has improved and whether services are effectively accessible.

ARTICLE 31 – CUSTODY, VISITATION RIGHTS AND SAFETY

GREVIO 2023 baseline findings

GREVIO found that the Family Law did not explicitly require domestic violence to be taken into account when deciding custody and visitation rights and that no specific legal provisions required systematic screening for a history of domestic violence in family-law proceedings. It identified insufficient evidence that violence was consistently considered in practice, including its impact on children who witness violence. GREVIO also highlighted weaknesses in professional understanding of domestic violence and called for risk assessment and risk management to be incorporated into custody and visitation decisions, for contact to be restricted where necessary and for judges, Centres for Social Work and other relevant professionals to receive appropriate guidance and training.

Developments since the baseline evaluation

The central legislative gap remains: domestic violence is still not an explicit mandatory criterion in custody and visitation decisions. Practice remains inconsistent and there is no systematic screening or unified methodology requiring risk assessments to be considered in these proceedings. ESE's findings also show that violence, particularly psychological and economic violence, may be reframed as "disturbed family relations", weakening recognition of the woman and child as victims. Information on previous violence, risk assessments and protection measures does not consistently follow the case from domestic-violence proceedings into custody and visitation decisions. Children who witness violence are not consistently recognised as victims, and safe handover and supervised visitation arrangements are not systematically available. The result remains a fragmented approach in which parental contact may be addressed separately from the continuing safety of women and children.

Article 31 requires that incidents of violence against both the child and the non-abusive parent are taken into account when decisions on custody and visitation are made. As underlined in the Council of Europe Explanatory Report to the Convention, contact with children is often one of the few remaining links between the victim and the perpetrator after separation and may therefore create a continuing safety risk for both women and children. Custody and visitation arrangements must consequently be organised in a manner that protects victims and children from further harm¹⁶.

Question 32 – Taking domestic violence into account in custody and visitation decisions

Domestic violence is not consistently recognised and retained as a relevant factor in custody and visitation proceedings. A fundamental problem arises at the very beginning of the institutional response: domestic violence is not always adequately recognised as violence, particularly where psychological, economic and other less visible forms are involved.

ESE's long-term legal assistance and representation of women survivors, as well as the experience of other specialist organisations, show that some cases initially reported as domestic violence are subsequently treated by Centres for Social Work as "disturbed marital relations" or broader family problems. Once this happens, a different methodology may be applied, with the focus shifting from protection from violence to improving family or parental relations.

This may include referring women to counselling aimed at strengthening parenting skills together with the perpetrator and their children. Such practice obscures the distinction between domestic violence

¹⁶ Council of Europe, Explanatory Report to the Council of Europe Convention on preventing and combating violence against women and domestic violence, Istanbul, 11.V.2011, Article 31, Par. 175-176

and ordinary family conflict, may deepen women's trauma and may restrict access to protection measures and specialist services.

This initial failure to properly identify domestic violence has direct consequences for custody and visitation proceedings. In divorce proceedings involving minor children, courts are required to obtain an opinion from the Centre for Social Work. The State report shows that seven of ten courts consider domestic violence in practice primarily through reports and opinions submitted by Centres for Social Work. However, reliance on the opinion of the Centre for Social Work cannot ensure that domestic violence is adequately taken into account if the Centre itself has previously failed to identify the case as domestic violence or has treated it as disturbed family relations.

This creates a chain of consequences relevant to points (a), (b) and (c) of Question 32.

First, although courts may state that domestic violence is taken into account through the opinion of the Centre for Social Work, there is no guarantee that violence has been correctly identified and assessed before the opinion reaches the court. This is particularly problematic in cases involving psychological, economic and other forms of violence that are less visible and more difficult to recognise.

Second, where violence against the mother is reframed as parental or marital conflict, the harm suffered by the child from witnessing violence may also be insufficiently recognised. The assessment may focus primarily on maintaining the child's relationship with both parents rather than on the consequences for the child of exposure to violence against the non-abusive parent. The State report confirms that none of the surveyed courts identified an explicit legal obligation to recognise the harm suffered by a child who witnesses violence between parents.

This concern is also confirmed by the findings of the professional supervision carried out by the Institute for Social Activities in 2024. The Institute found that Centres for Social Work do not consistently recognise children as victims of domestic violence where they are indirectly exposed to violence, including where they witness violence against their mother. It therefore recommended that Centres for Social Work pay particular attention to recognising the different forms and consequences of violence affecting children, regardless of whether they are direct or indirect victims. However, these recommendations are addressed only to the individual Centres for Social Work where shortcomings were identified, and there is no mechanism ensuring that the findings and recommendations are systematically applied by all CSWs throughout the country.

Third, if the distinction between the violent and non-violent parent is not clearly established at the institutional assessment stage, there can be no consistent basis for prioritising custody with the non-violent parent. The State report confirms that none of the surveyed courts identified an automatic or mandatory priority for awarding custody to the non-violent parent.

Particularly concerning are cases documented by civil society organisations in which Centres for Social Work, allegedly in the interest of protecting the child, initiated temporary protection measures not only against the perpetrator but also against the woman victim of domestic violence. In such cases, instead of clearly distinguishing between the perpetrator and the victim, the protection mechanism effectively places both parents in a comparable position and may result in further victimisation of the woman. The practical problem is therefore not only whether courts formally take domestic violence into account, but whether the violence has been correctly identified, documented and transmitted to the court in the first place.

There is no systematic screening for a history of domestic violence. This problem is reinforced by the absence of mandatory screening in custody and visitation proceedings. The State report confirms that none of the surveyed courts conducts systematic ex officio screening for a history of domestic violence in all custody and visitation cases. In eight courts, information is obtained mainly through evidence submitted by the parties and reports from Centres for Social Work. In some cases where parents reach an agreement, courts may approve the agreement without a more detailed examination of previous violence. This means that where domestic violence has not been adequately identified by the Centre for Social Work, or where information has not followed the case into the family-law proceedings, there is no additional systematic safeguard at court level to identify the missing history of violence.

Risk assessment is not systematically integrated into custody and visitation proceedings. The same weakness applies to risk assessment.

The State report confirms that there is no unified methodology for risk assessment in custody and visitation proceedings and no mandatory requirement for judges to request formal risk assessments prepared by the police, Centres for Social Work or other competent authorities. As a result, information already generated within the protection system, including previous risk assessments, protection measures, threats, breaches and other relevant circumstances, is not systematically incorporated into decisions concerning custody and visitation. The result is a fragmented process in which domestic violence may be identified and assessed at one stage, but lose its relevance when the case moves into proceedings concerning parental rights and contact with children.

Question 33 – Knowledge and understanding of domestic violence in custody and visitation proceedings

Domestic violence is not always adequately recognised in family-related proceedings. The practices described under Question 32 also indicate insufficient professional understanding of the dynamics of domestic violence in family-related proceedings. This is particularly evident in cases involving psychological, economic and other less visible forms of violence, which may be treated as “disturbed marital relations” rather than domestic violence. Where violence is reframed as a family or parental conflict, women may be referred to joint counselling with the perpetrator, the distinction between the victim and perpetrator may become blurred, and the continuing impact of violence on both the woman and the child may be insufficiently recognised. These practices indicate the need for judges, court-appointed experts, CSW professionals and other relevant practitioners to have a stronger understanding of the gendered dynamics of domestic violence, coercive control, post-separation violence and the distinction between domestic violence and ordinary parental conflict.

Children who witness domestic violence are not consistently treated as victims. The requirements of Article 31 are particularly relevant where children have witnessed violence against their mother. Exposure to domestic violence can have serious consequences for children even where they have not been directly physically assaulted. However, practice indicates that children who witness violence are not consistently recognised as victims in their own right. This weakens the extent to which the history and consequences of domestic violence are taken into account when decisions concerning custody, contact and visitation are subsequently made.

The assessment of the child’s best interests should therefore not be limited to whether the child has been directly subjected to physical violence. It must also take into account exposure to violence against the non-abusive parent, the continuing effects of coercive and controlling behaviour and the risk that contact with the perpetrator may expose either the child or the mother to further harm.

The findings of the Institute for Social Activities described under Question 32 also demonstrate insufficient professional recognition of the impact of witnessing domestic violence on children. The assessment of the child's best interests should not be limited to whether the child has been directly subjected to physical violence, but should include exposure to violence against the non-abusive parent and its psychological and developmental consequences.

Question 33(c) – “Parental alienation” and analogous concepts

Insufficient evidence on the use of “parental alienation” and analogous concepts. There is not sufficient evidence to assess whether judges, court-appointed experts and other professionals systematically use, reject or are trained concerning notions of “parental alienation” or analogous concepts. This therefore remains an area requiring further evidence. However, the documented tendency to reframe domestic violence as disturbed marital or parental relations creates a wider risk that violence and coercive control may be overshadowed by an emphasis on parental co-operation or family conflict. This makes it particularly important that professionals involved in custody and visitation proceedings are explicitly trained not to interpret a woman's safety concerns or a child's reluctance to maintain contact as evidence of obstruction without first properly assessing the history and dynamics of violence.

Question 34 – Co-operation and communication in custody and visitation proceedings

Information on domestic violence does not consistently follow the case into custody and visitation proceedings. One of the most significant weaknesses is the insufficient exchange of information and co-ordination between practitioners dealing with domestic violence and those subsequently responsible for custody and visitation. Once the involvement of the domestic-violence service within the Centre for Social Work ends and responsibility shifts to practitioners dealing with custody or parental rights, relevant information about the history of violence, risk assessments and protection measures may not follow the case. ESE's findings confirm this lack of internal continuity. In practice, custody and visitation issues may subsequently be dealt with primarily under the family-law framework, without sufficient consideration of the fact that violence may continue after separation, including during child handovers and visitation. As a result, custody and visitation decisions may be made without a complete understanding of the violence that preceded separation or of the continuing risks faced by the woman and child. This is particularly problematic because domestic violence does not necessarily end with separation. On the contrary, contact with children is one of the principal remaining means through which the perpetrator can continue control, intimidation or pressure against the woman. The problem is therefore not only insufficient co-operation between different institutions, but also insufficient continuity of information within the same institution, particularly between professionals responsible for domestic violence and those responsible for custody and visitation. There is also insufficiently structured communication between Centres for Social Work, courts and other relevant actors when custody and visitation decisions are being made. Available practice does not demonstrate a systematic mechanism ensuring that information from police, criminal proceedings, protection-order proceedings, healthcare services or specialist women's organisations is consistently available and considered in family-related proceedings. This results in fragmentation between the protection system and the system regulating parental rights.

A protection history should remain part of the case throughout custody and visitation proceedings. The history of domestic violence should not cease to be relevant once immediate protection measures end. Information concerning previous violence, risk assessments, temporary protection measures, breaches of those measures and the woman's continuing safety concerns should remain available and should be actively considered whenever decisions on custody and visitation are made or reviewed. A

stronger legal and procedural framework is therefore needed to ensure that the relevant information follows the case from: reporting and protection → risk assessment → custody and visitation decisions → implementation and review of contact arrangements.

Question 35 – Safety during the exercise of custody and visitation rights

Current practice does not sufficiently eliminate the risk of further violence during child contact. The exercise of visitation rights may expose women to renewed contact with the perpetrator and create opportunities for further violence, intimidation, threats or control. ESE's findings indicate that services responsible for custody and visitation do not always take adequate measures to protect women during the handover of children and during contact arrangements. This is particularly concerning where the professionals dealing with custody and visitation do not have sufficient information about the full history of domestic violence. The risk is therefore not limited to the child. In line with Article 31, protection arrangements must also ensure that the non-abusive parent is not exposed to further violence through the practical exercise of visitation rights.

Contact with children may be used to continue violence and control. Where common children remain the principal link between the woman and perpetrator after separation, contact arrangements can provide an opportunity to continue coercive and controlling behaviour. This risk is confirmed by the findings of the professional supervision carried out by the Institute for Social Activities. The Institute found that perpetrators of domestic violence frequently use contact with their children as an opportunity to continue violence against women. Women receiving support from specialist civil society organisations report similar experiences, including continued violence for years after separation or divorce, particularly in connection with child handovers and visitation. This confirms that the safety assessment of visitation arrangements cannot be limited to the risk of direct violence against the child, but must also assess whether contact with the child creates opportunities for continued violence, coercion or control over the mother. The current approach does not consistently ensure that this broader risk is assessed.

Safe handover and supervised visitation are not systematically ensured. Where risk exists, contact arrangements should minimise or eliminate direct interaction between the woman and the perpetrator. This may require safe handover arrangements, supervised contact, suitable premises and trained personnel. In practice, such safeguards are not systematically ensured. There is insufficient evidence of a consistently available nationwide infrastructure for safe and supervised visitation or of specialised personnel available throughout the country to support such arrangements. The absence of such safeguards is particularly problematic in cases in which direct contact between the parents creates a foreseeable risk of renewed violence.

Professionals involved in custody and visitation need specialised training. Professionals dealing with custody and visitation require more than general family-law expertise. They need a sufficient understanding of: the dynamics of intimate partner violence; coercive control and post-separation violence; the impact on children of witnessing violence; the ways in which children can be used to continue control over the mother; the distinction between domestic violence and ordinary parental conflict; and the need to prioritise safety when organising contact. Without such knowledge, measures intended to preserve parental contact may inadvertently expose women and children to renewed harm.

Question 36 – Withdrawal of parental rights

Restriction or withdrawal of parental rights is rarely pursued even where children are directly affected by violence. The available information does not demonstrate that restriction or withdrawal

of parental rights is systematically considered or applied where this is necessary to protect the safety and best interests of the child and the non-abusive parent. ESE's experience from providing legal assistance to women survivors indicates that Centres for Social Work are reluctant to initiate or pursue measures affecting the parental rights of perpetrators of domestic violence, including in cases where children have themselves been directly subjected to violence. In practice, the existence of domestic violence, or even direct violence against the child, does not necessarily trigger an assessment of whether continued exercise of parental rights is compatible with the child's safety and best interests. This points to a broader problem in the protection response: parental rights and continued parent-child contact may remain the default consideration, while restriction or withdrawal of those rights is treated as an exceptional measure rather than as a protection option to be actively assessed in high-risk cases. Where Centres for Social Work do not initiate the relevant procedure or provide the court with a clear assessment of the risks associated with continued parental rights, the possibility of restricting or withdrawing those rights may not be effectively considered.

RECOMMENDATIONS – ARTICLE 31

Relevant 2023 GREVIO recommendations that should be reiterated:

- on take the necessary measures, including legislative amendments, to ensure that courts, Centres for Social Work and other competent authorities are under an explicit obligation to take into account incidents of domestic violence, including violence by one parent against the other and violence witnessed by the child, in all decisions concerning custody and visitation.
- on systematically monitor the practice of courts and Centres for Social Work concerning the consideration of domestic violence in custody and visitation proceedings.
- on incorporate risk-assessment and risk-management procedures into custody and visitation proceedings and to restrict custody and visitation rights where necessary to guarantee the safety and best interests of the child and the safety of the non-abusive parent.
- on ensure children's safety in conditions that enable them to remain with the non-abusive parent, preferably in their own home, rather than placing the burden of the consequences of violence on the victim and child.
- on ensure that all relevant professionals, particularly judges and professionals from Centres for Social Work, receive specialised training and clear guidelines on domestic violence and actively seek relevant information from law-enforcement bodies, specialist women's support services and other relevant actors when deciding on custody and visitation.

Further specification proposed in light of the 2023 GREVIO findings and current developments:

- on identifying domestic violence by requiring systematic screening for a history of domestic violence in all custody and visitation proceedings, irrespective of whether the violence has previously been formally reported, and ensuring recognition of psychological, economic and other less visible forms of violence.
- concerning children witnessing domestic violence by requiring that exposure to violence against the non-abusive parent is recognised and assessed as harm to the child and is systematically taken into account in determining the child's best interests, custody and contact arrangements.
- on risk assessment and risk management by establishing mandatory procedures ensuring that previous risk assessments, protection measures and their breaches, threats, criminal and civil proceedings and the woman's continuing safety concerns remain part of the case throughout custody and visitation proceedings and whenever contact arrangements are reviewed.
- on inter-institutional co-operation by ensuring continuity of information both between institutions and within Centres for Social Work, particularly when responsibility shifts from

professionals dealing with domestic violence to those dealing with custody, parental rights and visitation.

- on the safety of visitation arrangements by ensuring that contact with children does not provide opportunities for continued violence, coercive control or intimidation of the non-abusive parent, including through safe child-handover arrangements, supervised visitation where necessary, appropriate premises and adequately trained personnel available throughout the country.
- on professional guidance and training by requiring clear written guidance for Centres for Social Work and other relevant professionals on distinguishing domestic violence from “disturbed family relations” or ordinary parental conflict and on avoiding joint counselling, reconciliation-oriented approaches or other interventions that blur the distinction between victim and perpetrator.
- on monitoring practice by collecting data on cases involving domestic violence in which custody or visitation was restricted, supervised or denied; risk assessments were considered; children witnessing violence were recognised as victims; and parental rights were restricted or withdrawn, in order to assess whether Article 31 safeguards are being applied in practice.

Additional recommendations based on the current findings:

- GREVIO to call on the authorities to ensure that concepts such as “parental alienation” or analogous notions are not used to obscure, minimise or discredit allegations of domestic violence, coercive control or the safety concerns of women and children, and that a woman’s safety concerns or a child’s reluctance to maintain contact are not interpreted as obstruction without a prior assessment of the history and dynamics of violence.
- GREVIO to call on the authorities to ensure that restriction or withdrawal of parental rights is actively assessed and effectively available where continued exercise of those rights would endanger the child or the non-abusive parent and safety cannot otherwise be guaranteed. Centres for Social Work should initiate or support such proceedings where warranted, including in cases where the child has been directly subjected to violence, rather than treating continued parental rights and contact as the default approach.

INVESTIGATION, PROSECUTION AND PROTECTIVE MEASURES

ARTICLES 49 AND 50: GENERAL OBLIGATIONS AND IMMEDIATE RESPONSE, PREVENTION AND PROTECTION

GREVIO 2023 baseline findings. GREVIO identified serious weaknesses in the law-enforcement and prosecutorial response to violence against women. Reports were not always taken seriously and practices of minimisation, victim-blaming, attempted reconciliation and warnings concerning false reporting created barriers to reporting, including for sexual and digital violence. Investigations and prosecutions relied heavily on victims' statements, while proactive collection of other evidence remained insufficient. GREVIO also identified the absence of specialised prosecutors and standard prosecutorial procedures, lengthy proceedings, high attrition and concerns regarding low conviction rates and lenient sanctions. It called for stronger specialised capacity, standard reporting and investigative procedures, victim-centred and gender-sensitive responses, proactive evidence-building and systematic analysis of attrition.

Summary of developments since the baseline evaluation. Some developments have occurred since the baseline evaluation, including awareness-raising activities encouraging reporting, multilingual information materials and the 2026 amendment removing the requirement for a victim's proposal for the prosecution of bodily injury committed in the context of gender-based violence, violence against women or domestic violence. However, the available evidence does not demonstrate a systemic improvement in investigation and prosecution. Police and prosecution services continue to face resource and specialisation gaps, while no comprehensive joint police–prosecution investigative protocol covering all forms of violence against women has been established. Formal requirements of urgency exist, but there is no demonstrated national fast-track mechanism, benchmarking system or systematic monitoring of delays across the criminal justice process. Psychological, economic, sexual and digital forms of violence remain particularly difficult to recognise, classify and investigate, and evidence-building continues to rely insufficiently on sources beyond the victim's testimony. Measures encouraging reporting have not been matched by systematic action to remove procedural, communication and accessibility barriers faced by women exposed to intersectional discrimination. Broader attrition remains insufficiently tracked and analysed throughout the criminal justice chain, while sentencing practice continues to raise concerns regarding the effectiveness of sanctions.

40. Please describe the human, financial and technical resources provided to law enforcement agencies to diligently respond to and investigate all cases of violence against women, including their digital dimension.

Persistent resource constraints undermine diligent police response and investigation. The general conclusion is that no substantial efforts have been undertaken to address GREVIO's baseline findings and recommendations in this area. The findings presented below are based on the direct experiences of women who have experienced domestic violence, as well as on the practical experience of police officers handling such cases¹⁷. According to police officers, one of the main challenges preventing the effective implementation of their statutory obligations in relation to gender-based violence against women and domestic violence is the lack of adequate financial, human and technical resources. This is a long-standing systemic problem that constitutes one of the root causes undermining the capacity

¹⁷ The findings concerning the practical handling of cases by the police are based on ESE's regular monitoring of the situation and on specific activities conducted with practitioners, including training sessions, forums and thematic consultations.

of the police to respond promptly and effectively, conduct thorough investigations and address the wider shortcomings within the criminal justice protection system, which are elaborated in detail below.

41. Which measures have been taken to ensure that the premises of police stations are accessible and suitable for receiving and interviewing victims of violence while ensuring their privacy? Is it possible to report cases of violence against women elsewhere than in police stations, including through digital means?

Police reporting environments do not consistently protect privacy or prevent secondary victimisation. The first shortcomings arise immediately upon reporting violence at a police station. Adequate spatial conditions have still not been ensured for conducting individual interviews with victims in separate and appropriately equipped rooms within police stations¹⁸, although this constitutes an important safeguard against secondary victimisation. In practice, women survivors are commonly required to disclose and describe the violence they have experienced in the presence of several police officers. The lack of privacy may affect both the quality of the victim's statement and the amount and detail of information she is able or willing to provide concerning the circumstances of the individual case, including information relevant for subsequent police action and protection measures. Moreover, the police lack the necessary resources to consistently implement other statutory safeguards against secondary victimisation¹⁹. These include limiting the number of times a victim is required to give a statement to a maximum of two times during the protection proceedings; taking a statement at the police station by means of audio and video recording that can subsequently be used as evidence; taking the statement at the place where the violence is reported; and other measures intended to reduce repeated questioning. In practice, women who have experienced domestic violence are still required to recount the violence repeatedly before different police officers, including inspectors and uniformed police officers. Police stations also lack the necessary technical equipment to make audio and video recordings of victims' statements. Women survivors who first report violence to the Centre for Social Work are generally referred to the police station to make a separate report. In practice, the police do not usually come to the premises of the Centre for Social Work to take the victim's statement there. As a result, the statutory possibility of taking the statement at the place where the violence is reported is not effectively used in practice.

Alternative reporting channels do not eliminate the need for a separate formal police statement. Victims of gender-based violence against women and domestic violence may report violence by telephone. However, information provided during a telephone report, and the information recorded by the police officer receiving the call, is generally insufficient to substitute for a formal statement or to be relied upon as evidence in subsequent proceedings. Consequently, victims are still required to provide their statement subsequently to the police.

42. Please explain whether specialist police/prosecution units exist to investigate and prosecute violence against women and specify: a. which forms of violence against women they are competent for; b. whether such units exist in all police/prosecution districts throughout the country.

Police and prosecution specialisation remains limited in scope and geographic coverage. Another significant shortcoming, closely linked to the limitations described above, is the lack of sufficiently

¹⁸ This shortcoming was already identified by GREVIO in its baseline evaluation.

¹⁹ Article 44 of the Law on Prevention and Protection from Violence against Women and Domestic Violence.

specialised police and prosecution personnel and structures for handling cases of violence against women.

Specialisation within the police remains very limited in both geographical coverage and substantive scope. GREVIO's baseline evaluation welcomed the appointment of specialist police inspectors working in the field of domestic violence and the establishment of a specialised unit in Skopje. However, this specialised unit is competent only for cases of domestic violence against women. It does not cover other forms of domestic violence, nor does it have specialised competence for the other forms of violence against women covered by the Istanbul Convention. Outside the specialised arrangements identified above, cases of violence against women and domestic violence are handled in practice by police inspectors and uniformed police officers. The lack of sufficiently specialised personnel who understand the nature and dynamics of violence against women, as well as the practical requirements for implementing the relevant legal obligations, continues to represent a serious challenge. It affects the initial assessment and classification of reported incidents and, consequently, the way in which cases are handled at later stages. The experience of police officers confirms that many officers are still not sufficiently trained and specialised to handle such cases. GREVIO's baseline finding that law-enforcement officers do not always have an adequate understanding of the nature, dynamics and specific characteristics of gender-based violence against women and domestic violence therefore remains relevant. In practice, a victim's first contact with the police may still be with an officer who has not received even basic specialised training on handling violence against women cases. The wider shortcomings concerning the systematic initial and continuous training of police officers are addressed under Article 15 of this report.

The existing police specialisation identified by GREVIO is essentially centred on domestic violence. There is no information demonstrating the existence of equivalent, nationwide specialised police units or designated specialist officers covering the full range of forms of violence falling within the scope of the Istanbul Convention, including rape and sexual violence, psychological violence, stalking, sexual harassment and its digital manifestations, forced marriage, female genital mutilation, and forced abortion or sterilisation.

A further concern is the absence of a structured internal system for transferring knowledge and practical experience within individual police organisational units. Although the existing mentoring system for newly recruited police officers could be used to incorporate specific content and practical guidance on handling cases of violence against women, this opportunity has not been systematically used. Establishing internal mentoring and knowledge-transfer mechanisms, involving more experienced and trained officers, could contribute substantially to improving and harmonising police practice. Police officers have also identified a need for regular exchange of practical experience between the different regional sectors for internal affairs in order to discuss recurring challenges, identify solutions and improve consistency in practice.

No specialised prosecution structures have been established. The lack of specialisation is even more pronounced at prosecution level. In its baseline evaluation, GREVIO expressly noted that there were no specialised prosecutors handling cases of violence against women and domestic violence, resulting in a lack of continuity of specialisation along the criminal justice chain. GREVIO therefore urged the authorities to consider establishing adequately staffed dedicated units within public prosecutors' offices to investigate and prosecute cases of violence against women and domestic violence. Such dedicated prosecution units have not been established, either nationally or across individual public prosecutors' offices, and there is still no specialised prosecutorial capacity covering the full range of forms of violence against women under the Istanbul Convention. In practice, the insufficient level of specialisation and expertise among prosecutors results in shortcomings at two important levels.

First, prosecutors do not consistently recognise and legally qualify criminal acts related to certain forms of violence against women, particularly psychological and economic violence. According to the experience of police officers, criminal reports submitted for the offence of “Coercion” (Criminal Code, Article 139. Par.2.) have been dismissed by prosecutors on the grounds that the elements of a criminal offence were not established, even in cases involving clear indications of psychological or economic violence, where the victim was compelled, through psychological pressure and abuse, to act against her will or to refrain from doing something she wished to do. Consultations between police officers and judges with extensive experience in this field have further highlighted concerns that such cases may contain elements of coercion that are not adequately recognised by the prosecution. Police officers report that repeated dismissal of such cases is discouraging and, in subsequent similar situations, may lead them not to initiate criminal proceedings at all, leaving the incident recorded only as a complaint rather than pursued as a potential criminal offence.

Second, prosecutors do not consistently fulfil their corrective role where court-ordered temporary measures of protection are breached. In practice, when perpetrators violate imposed protection measures, the CSW or the police submit criminal reports concerning the criminal offence of Non-compliance with a court decision (Criminal Code, Article 377)²⁰. Practitioners from both CSWs and the police report that they often receive no information from the public prosecutor’s office regarding the outcome of the criminal procedures submitted. In individual cases, practitioners have even been informed that proceedings would not be initiated on the grounds that the offence was not prosecuted *ex officio*.

The continuing absence of specialised prosecutorial structures therefore affects not only the identification and prosecution of individual forms of violence against women, but also the effectiveness of the wider system of protection. The concern identified by GREVIO in the baseline evaluation consequently remains fully relevant.

43. Please describe any measures taken to ensure swift investigation into and effective prosecution of cases of violence against women and domestic violence such as prioritisation through fast-tracking, benchmarking or other initiatives, without compromising the thoroughness of the investigation.

Formal urgency requirements are not supported by systematic fast-tracking or monitoring of delays. Domestic-violence legislation establishes short deadlines for certain police interventions. Police are, for example, required to carry out a risk assessment and submit a proposal for an emergency protection measure within a short statutory period. The State report also states that violence against women and domestic-violence cases are treated urgently and with priority. However, no data are provided demonstrating actual timeframes from reporting to police investigation, prosecutorial decision, indictment and subsequent proceedings. Nor does the State report identify a national fast-track mechanism, benchmarks for the duration of investigations or a system for monitoring unjustified delays.

Operational weaknesses can undermine both the speed and quality of investigations. ESE’s findings reveal practical factors capable of undermining both speed and quality. Uniformed police officers are usually the first responders, but they do not always have immediate access to relevant information

²⁰ The CSW has the statutory obligation to monitor the implementation of temporary protection measures and to submit a criminal report when a breach is established. In practice, police officers also submit criminal reports directly when they detect breaches of measures whose implementation is their obligation, most commonly prohibition orders.

concerning previous reports, previous convictions or the perpetrator's access to firearms. In some cases, initial risk assessments are incomplete and specialised inspectors must subsequently obtain additional information or another statement from the victim. Difficulties also arise during weekends and public holidays where immediate judicial action is required.

Insufficient early police–prosecution co-operation delays effective case-building

A particularly important weakness is insufficient operational co-operation between the police and public prosecution during the investigative stage. Practitioners report that the police frequently carry the main responsibility for documenting the incident and gathering evidence, while the prosecutor becomes substantively involved later, when determining the final legal qualification and whether to proceed with prosecution. Formal requirements of urgency are therefore not sufficient. Effective implementation requires an investigative pathway in which police and prosecutors co-operate from the earliest stage, responsibilities are clear, evidence is proactively collected and delays can be identified and addressed.

44. Are any measures taken to encourage women and girls who experience any of the forms of violence against women covered by the Istanbul Convention to report incidents of violence to the authorities? Please provide examples of any measures taken to instill confidence in law-enforcement officials, including those aimed at addressing any language or procedural difficulties they encounter when lodging complaints, in particular those of migrant women, asylum-seeking women, women with disabilities, women with addiction issues and other women and girls at risk of intersectional discrimination.

Awareness-raising has increased, but reporting barriers remain. Following the baseline evaluation, several awareness campaigns have encouraged recognition and reporting of gender-based violence and domestic violence. Information materials were distributed to police stations and other institutions, including materials in Macedonian, Albanian, Romani and Turkish. These initiatives are useful developments.

Confidence in reporting depends on the quality of the institutional response. However, encouraging women to report cannot be separated from what happens after a report is made. ESE's findings show that women may encounter insufficient recognition of psychological, economic, sexual and digital violence, inadequate privacy, uneven application of protection mechanisms and difficulties in the investigation and collection of evidence. Such weaknesses undermine confidence in the police response irrespective of the number of campaigns encouraging reporting. This is particularly relevant because GREVIO had already identified distrust and reporting barriers in 2023, including the minimisation of violence by individual officials and victim-blaming attitudes. It also identified particular barriers for Roma women, women with disabilities, migrant and asylum-seeking women, women with addiction issues and other women exposed to intersectional discrimination.

Specific barriers faced by women exposed to intersectional discrimination remain insufficiently addressed. The available information since 2023 does not demonstrate the establishment of systematic measures within law enforcement to address the specific procedural barriers faced by these groups, such as accessible communication, interpretation, accessible premises and formats, appropriately trained staff and individual assistance during reporting. Nor is there evidence of systematic monitoring of women's experience and satisfaction with the police reporting process. The relevant measure of progress should therefore not be only whether women are encouraged to report, but whether they can expect that their report will be recognised, taken seriously, properly classified, investigated and followed by protection and accountability.

45. Please indicate whether protocols/standard operating procedures or guidelines for police officers are in place providing guidance on how to receive reports, interview victims, investigate and collect evidence in cases of rape and sexual violence, domestic violence, psychological violence, stalking, sexual harassment (including their online manifestation), forced marriage, female genital mutilation and forced sterilisation/abortion. Please provide information on how the authorities ensure the comprehensive collection of evidence beyond the victim's testimony.

No comprehensive criminal-justice investigative protocol exists for violence against women. A number of by-laws and operational documents regulate certain aspects of the institutional response to violence against women and domestic violence. However, these instruments are primarily focused on the protection system rather than on the criminal justice response. The Ministry of Interior by-laws mainly regulate risk assessment and the implementation of emergency and temporary protection measures, while the Government Protocol on Inter-institutional Cooperation is also predominantly focused on the co-ordinated provision of protection and support to victims.

What is still missing is a specific criminal justice protocol or standard operating procedure linking the police, the Public Prosecutor's Office and the criminal courts and providing clear operational guidance on the recognition and legal qualification of offences, investigation, collection and preservation of evidence, division of responsibilities and co-ordination throughout the criminal proceedings.

The absence of such a protocol is also reflected in practice. Some police practitioners consider co-operation with the Public Prosecutor's Office to be insufficient, particularly during the early stages of a case. According to their experience, prosecutors are often involved only after a criminal report has already been submitted, rather than at an earlier stage of the investigation when decisions are being made about the legal qualification of the conduct and the collection and securing of evidence. This is particularly problematic in cases involving psychological, economic, sexual and other forms of violence where the evidence is less visible and requires more proactive case-building.

The limited early involvement of prosecutors and the absence of a common investigative framework indicate a clear need for a joint police–prosecution protocol for violence against women and domestic violence. Such a protocol should establish offence-specific investigative guidance, clarify the respective responsibilities of the police and prosecutors, and ensure their early co-operation in identifying relevant evidence and building cases that do not depend primarily on the victim's testimony.

Psychological, economic, sexual and digital violence remain insufficiently recognised and legally qualified. A direct consequence of the insufficient training and specialisation of police officers described under Question 42, combined with the absence of sufficiently detailed investigative guidance, is the failure to consistently recognise and legally qualify different manifestations of domestic violence from the moment they are reported. Psychological, economic and sexual violence are particularly likely to remain unidentified as potential criminal offences, especially where there are no visible physical injuries or immediately available evidence. This problem is reflected in the way domestic violence cases are initially recorded. According to Ministry of Interior data for 2025, of the 6,915 reported cases of domestic violence, 5,436 (79%) were registered only as complaints, compared with 1,195 (17%) registered as criminal offences and 284 (4%) as misdemeanours. Registration as a complaint is not merely an administrative classification. In practice, such cases are not pursued through criminal proceedings and the police response is generally limited to measures such as warning the perpetrator.

According to police practitioners, incidents are frequently registered as complaints because the reported conduct is not recognised as containing elements of a criminal offence or because officers

consider that sufficient evidence is lacking. This is particularly relevant to psychological and economic violence. Criminal offences that may correspond to such conduct, including Coercion under Article 139(2) and Unlawful deprivation of liberty under Article 140 (2) of the Criminal Code in the context of domestic violence, account for only around 1% of reported criminal offences related to domestic violence. The very limited use of these offences raises concerns as to whether psychological and economic forms of domestic violence are being adequately recognised and investigated.

Police practitioners have also described cases in which the same woman reported violence repeatedly, while each incident was recorded separately as a complaint and no criminal report was submitted. More experienced practitioners have pointed out that repeated complaints concerning the same victim and perpetrator should not be assessed in isolation. A series of previous complaints may itself constitute relevant evidence of continuity, escalation and a pattern of abusive or coercive conduct and should be taken into account when assessing whether there is a basis for submitting a criminal report and undertaking further investigation.

The problem therefore begins at the very first stage of police intervention. If psychological, economic or sexual domestic violence is not recognised and documented as potentially criminal conduct when first reported, the subsequent actions are unlikely to compensate for that initial failure. The case may remain at the level of repeated complaints and warnings to the perpetrator rather than trigger effective criminal investigation and evidence-building.

Similar recognition and investigation difficulties arise in relation to other forms of violence against women. Police practitioners report challenges in recognising and legally qualifying sexual violence following the 2023 Criminal Code amendments, as well as different forms of technology-facilitated gender-based violence. Reported digital cases include, among others, blackmail by former intimate partners involving intimate photographs or videos, misuse of images or deepfakes involving girls, stalking and other forms of online abuse. Difficulties concern not only legal qualification but also determining which police organisational unit should handle the case and securing electronic evidence in a timely manner.

Evidence-building remains insufficiently proactive and overly dependent on the victim's testimony.

The second major shortcoming concerns evidence collection beyond the victim's testimony. The State report states that the existing procedures enable the police to systematically document risk and relevant facts and to obtain medical documentation, expert opinions and other evidence through inter-institutional co-operation. However, practical findings indicate that this has not yet translated into a sufficiently proactive and consistent evidence-building practice, particularly in cases where the violence leaves no visible physical injuries.

This concern is not new. In its baseline evaluation, GREVIO found a strong reliance by both police and prosecution services on the victim's statement, particularly in domestic violence cases, and noted that proceedings frequently ended when victims withdrew their statements because supporting evidence had not been secured. GREVIO specifically called for stronger case-building, timely collection of evidence and proactive collection and consideration of evidence other than the victim's testimony.

Comprehensive evidence collection should therefore include, depending on the circumstances of the case, previous police reports and complaints involving the same perpetrator and victim, witness statements, medical and psychological documentation, messages and other communications, photographs and recordings, digital evidence, financial and employment records and other documentation capable of demonstrating coercion, control, restriction or a continuing pattern of

abuse. The current practice does not demonstrate that such evidence is systematically sought and combined in all relevant cases.

The findings therefore indicate that, while important legal acts, rulebooks and inter-institutional mechanisms are in place, a significant gap remains between the regulation of protection and risk management on the one hand, and detailed operational guidance for criminal investigation and evidence-building on the other. There remains a need for comprehensive police and police–prosecution investigative guidance covering the full range of violence against women under the Istanbul Convention, including offence-specific indicators, elements of the relevant criminal offences, responsibilities for evidence collection, and practical guidance on securing medical, forensic, documentary, witness and digital evidence independently of, and in addition to, the victim’s testimony.

46. Please describe the efforts taken to identify and address all factors that contribute to attrition (the process whereby cases drop out of the criminal justice system) in cases of violence against women and domestic violence.

Attrition remains substantial across different stages of the criminal justice process. Attrition in cases of violence against women and domestic violence remains a serious concern and occurs at several stages of the criminal justice process. As explained under Question 45, a substantial proportion of reported domestic-violence cases do not enter the criminal justice pathway at all, but are recorded as complaints. This is particularly relevant in cases involving psychological and economic violence, where criminal conduct is less consistently recognised and investigated. Attrition also occurs after a case has formally entered the criminal justice system. ESE’s practitioner findings indicate several recurring factors: insufficient evidence collection, over-reliance on the victim’s statement, limited specialised capacity, weak police–prosecution co-operation, delays in proceedings, and insufficient protection and support enabling women to remain safely engaged in the process. Victim withdrawal has historically been a particularly important factor in relation to the criminal offence of bodily injury, which is also one of the most frequently recorded criminal offences in domestic-violence cases. Until 2026, bodily injury committed in the context of domestic violence was exceptional among the relevant domestic-violence offences because prosecution depended on a proposal by the victim. In practice, where women subsequently withdrew or did not maintain such a proposal, criminal proceedings could not continue. This created a particularly significant point of attrition in cases involving physical domestic violence.

An important legislative change was introduced in 2026. The amendment followed a series of serious domestic-violence cases at the end of 2025 and the beginning of 2026, including femicides and the death by suicide of a mother together with her child, which brought renewed attention to shortcomings in the criminal-law response to domestic violence. The Criminal Code was amended to remove prosecution upon the victim’s proposal for bodily injury committed in the context of gender-based violence, violence against women or domestic violence²¹. Such cases are now prosecuted without demanding survivors consent, bringing this offence into line with the approach applicable to other domestic-violence offences. This amendment removes an important legal mechanism through which cases could previously drop out of the criminal justice system following withdrawal by the victim.

The 2026 amendment removes one source of attrition but does not address broader institutional causes. Nevertheless, eliminating the requirement for the victim’s proposal does not resolve the

²¹ Law for Amending and Supplementing the Criminal Code, Official Gazette No. 16/2026

broader problem of attrition. As described under Question 45, many domestic-violence incidents, particularly those involving psychological and economic violence, continue to be recorded only as complaints and therefore never enter the criminal justice pathway in the first place. The problem has consequently shifted into sharper focus on the institutional identification, classification, investigation and evidence-building of cases, rather than solely on whether the victim subsequently supports prosecution.

Moreover, victim withdrawal should not in itself be treated as an adequate explanation for attrition. Women may disengage because of pressure or threats from the perpetrator, economic dependence, fear of further violence, repeated questioning, lack of confidence in the authorities, procedural delays or the perception that reporting has not resulted in effective protection. The withdrawal of a victim should therefore be analysed together with the quality and effectiveness of the institutional response preceding it.

ESE's findings also indicate inconsistent practice in cases where a victim no longer supports further proceedings. In some police sectors, the case is nevertheless forwarded to the public prosecutor, with an indication that the victim's proposal or support has not been obtained, leaving the prosecutor to determine whether the case should proceed. In other cases, the matter may remain recorded only as a complaint and never reach the prosecution. Such differences in practice may themselves contribute to uneven attrition across the country.

The State report refers to non-reporting, fear, economic dependence, victims' withdrawal of co-operation and insufficient material evidence as factors contributing to attrition. These are relevant, but a comprehensive assessment must equally examine the role of the institutional response: failure to recognise different forms of violence, insufficient evidence collection, lack of specialised capacity, weak police-prosecution co-operation, procedural delays and insufficient protection capable of enabling women to remain safely engaged in proceedings.

A further concern arises at the final stage of the criminal justice process. While the State report refers to the predominance of convictions in domestic-violence cases, ESE's monitoring of court practice indicates that convictions frequently result in suspended sentences. Thus, even where a case successfully proceeds through investigation, prosecution and trial, the final sanction often remains lenient. This is of particular concern given that the Criminal Code provides for custodial sentences for a number of relevant offences. The widespread use of suspended sentences weakens the effectiveness of the criminal-law response and raises concerns as to whether sentencing practice adequately fulfils the purposes of punishment, including both special prevention in relation to the individual perpetrator and general prevention in relation to potential perpetrators and society more broadly.

Attrition is not systematically tracked across the criminal justice chain. At present, the authorities have not demonstrated that they systematically track and analyse where and why cases leave the criminal justice chain: report - police investigation - referral to the public prosecutor - prosecutorial decision - indictment - court proceedings - final judgment and sanction. This remains closely linked to the broader gaps in harmonised case-tracking data identified under Article 11. Without systematic follow-up across institutions, it is not possible to determine how many cases are discontinued at each stage, for what reasons, or whether attrition results from evidentiary weaknesses, prosecutorial decisions, procedural delays, victim withdrawal, insufficient protection or other institutional factors.

Nor is there evidence of a structured mechanism through which such findings are regularly analysed and used to improve practice. The 2026 amendment concerning bodily injury represents an important response to one specific source of attrition. However, reducing attrition more broadly requires

systematic case-tracking, analysis of the reasons for discontinuation at each stage, and joint review by the police, prosecution and courts in order to identify and address recurring institutional barriers.

47. Please indicate if legislative or other measures have been taken to issue a renewable residence permit to migrant women who have become a victim of any of the forms of violence covered by the Istanbul Convention if the competent authority considers that their stay is necessary for the purpose of their co-operation in investigation or criminal proceedings.

Article 124 of the Law on Foreigners provides for a temporary residence permit of up to six months, renewable while the relevant conditions continue, for formally identified foreign victims of trafficking whose stay is necessary because of their personal circumstances or co-operation with the competent authorities.¹ However, this protection does not explicitly cover migrant women subjected to all forms of violence under the Istanbul Convention. The official GREVIO response reports that no permits have been requested or issued to migrant women on the basis of domestic or other Convention-covered violence.² By contrast, trafficking-specific data show that two applications were submitted and approved in 2022–2023. Both concerned Serbian girls trafficked through forced marriage: a 17-year-old in 2022 and a 14-year-old in 2023.³ The very low number of applications indicates significant barriers to identifying foreign victims and ensuring access to residence status and specialised services. Women and girls also represent a significant proportion of asylum applicants: 45 women and 25 girls in 2023, 24 women and 10 girls in 2024, and 26 women and 15 girls in 2025. Nevertheless, insufficient information is available on their systematic screening for trafficking and gender-based violence. These concerns are reinforced by the January 2024 case in which 99 women, mostly foreign nationals, were found in three hospitality establishments, without publicly available information demonstrating systematic victim screening or referral.⁴ Foreign women are frequently treated primarily as immigration or undeclared-work offenders rather than as potential victims of trafficking, sexual exploitation or gender-based violence. As the Law on Foreigners is currently being revised, this presents an important opportunity to extend residence protection to migrant women subjected to all forms of violence covered by the Istanbul Convention and to introduce mandatory gender-sensitive identification, screening and referral procedures.

RECOMMENDATIONS – ARTICLES 49 AND 50

Relevant 2023 GREVIO recommendations that should be reiterated:

- to enhance the capacity and knowledge of all law-enforcement officers regarding case-building for all forms of violence against women covered by the Convention, including timely evidence collection and effective and proactive investigation; to establish standard reporting and investigative procedures; to remove barriers to reporting, including for rape, sexual violence and digital forms of violence; to ensure a victim-centred and gender-sensitive response preventing secondary victimisation; and to ensure immediate law-enforcement response to reports of violence.
- concerning prosecution services to introduce guidelines or standard operating procedures ensuring victim-centred and gender-sensitive handling of all forms of violence against women; consider establishing adequately staffed dedicated units within public prosecutors' offices; strengthen prosecutorial capacity for case-building and timely evidence collection; proactively collect and consider evidence beyond the victim's statement; and ensure that prosecution does not depend in practice on forensic evidence or on the victim maintaining her statement.
- on attrition to identify and address the factors causing cases of violence against women to drop out of the criminal justice system, including delays, and to support this analysis through

reliable, harmonised and gender-disaggregated administrative and judicial data across the entire criminal justice chain.

- on resources by ensuring adequate human, financial and technical resources for law-enforcement and prosecution services to fulfil their obligations in responding to, investigating and prosecuting all forms of violence against women.
- to ensure that sentences imposed for domestic violence and other forms of violence against women are effective, proportionate and dissuasive.

Further specification proposed in light of the 2023 GREVIO findings and current developments:

- on a victim-centred law-enforcement response by requiring police stations to provide private and appropriately equipped rooms for interviewing victims and the technical capacity necessary to implement safeguards against repeated questioning and secondary victimisation, including audio and video recording of statements where provided by law.
- on specialisation by ensuring that specialised police and prosecutorial capacity is available throughout the country and covers the full range of violence against women under the Convention, rather than being concentrated geographically or predominantly limited to domestic violence. This should be supported by structured mentoring, internal knowledge transfer and regular exchange of practice between regional police sectors.
- on standard investigative procedures and prosecution by establishing a joint police–prosecution criminal justice protocol/SOP covering all forms of violence against women. It should provide offence-specific guidance on recognition and legal qualification, clarify institutional responsibilities, require early prosecutorial involvement and set standards for the collection and preservation of medical, forensic, documentary, witness, financial and digital evidence.
- on evidence-based case-building by requiring previous reports and complaints concerning the same victim and perpetrator to be considered together where relevant to identifying continuity, escalation or patterns of coercive and controlling behaviour, rather than treating each incident in isolation.
- concerning prosecution services by ensuring consistent prosecutorial follow-up where temporary protection measures are breached, including clear feedback to the police and Centres for Social Work on prosecutorial decisions and the outcome of criminal reports.
- on attrition by introducing systematic case tracking from report → police investigation → referral to the prosecutor → prosecutorial decision → indictment → court proceedings → final judgment and sanction, together with periodic joint review by police, prosecution and courts of the reasons why cases are discontinued or delayed.
- on attrition by ensuring that withdrawal or disengagement by the victim is not treated simply as the cause of a case dropping out. Authorities should examine whether withdrawal is linked to threats, economic dependence, fear of further violence, repeated questioning, delays, insufficient protection, poor institutional response or failure to secure evidence independently of the victim's testimony.
- concerning effective and dissuasive sanctions by monitoring the use of suspended sentences in cases of violence against women and analysing whether sentencing practice adequately reflects the seriousness, recurrence and gendered nature of the violence.

Additional recommendation – Question 47

- GREVIO to call on the authorities to ensure that migrant women who are victims of any form of violence covered by the Istanbul Convention can obtain a renewable residence permit where their stay is necessary for the purpose of co-operation in investigation or criminal proceedings, rather than limiting such protection in practice to formally identified victims of trafficking. The ongoing revision of the Law on Foreigners should also introduce systematic gender-sensitive identification, screening and referral procedures for migrant women and girls who may be victims of violence, trafficking or sexual exploitation.

ARTICLE 51: RISK ASSESSMENT AND RISK MANAGEMENT

GREVIO 2023 baseline findings

GREVIO welcomed the introduction of standardised risk-assessment tools for the police and Centres for Social Work, but found that they were not systematically or comprehensively used in practice and that relevant professionals lacked sufficient knowledge and skills. Co-operation between the police and Centres for Social Work during risk assessment was weak, specialist women's organisations were not systematically involved, and it was unclear whether risk information was consistently shared with prosecutors and judges. GREVIO called for systematic evidence-based risk assessment for all forms of violence, risk assessment and management to become central to multi-agency responses, firearm access to be systematically considered and identified risks to be followed by proportionate protective measures.

Developments since the baseline evaluation. Standardised police and social-work risk-assessment frameworks remain formally in place, but their practical use is inconsistent. Risk assessments may not be carried out in complaints or misdemeanour cases, may operate as an administrative formality and are rarely repeated when circumstances materially change. Several important risk factors are not expressly or fully reflected, including separation or break-up, current pregnancy and threats to take away common children, while the existing tools remain predominantly oriented towards domestic and intimate-partner violence. Police and Centres for Social Work continue largely to conduct separate assessments, and prosecutors, courts and specialist women's organisations are not systematically integrated into early risk assessment and management. No permanent mechanism for retrospective review of femicides and other fatal outcomes has been established.

48. Please describe any standardised and mandatory risk assessment tools in use by all relevant authorities in all regions for forms of violence against women such as stalking, violence committed in the name of so-called honour and domestic violence and to what extent these tools are being used in practice to assess the lethality risk, the seriousness of the situation and the risk of repeated violence with a view to preventing further violence. Please specify whether the following elements are considered as red flags when carrying out the risk assessment:

- a. the possession of or access to firearms by the perpetrator;
- b. the filing for separation/divorce by the victim or the break-up of the relationship;
- c. pregnancy;
- d. previous acts of violence;

- e. the prior issue of a restrictive measure;
- f. threats made by the perpetrator to take away common children;
- g. acts of sexual violence;
- h. threats to kill the victim and her children;
- i. threat of suicide;
- j. coercive and controlling behaviour.

A formal standardised framework exists, but important risk factors are not fully captured. The 2021 Rulebook requires police officers to conduct a risk assessment in every case of gender-based violence against women and domestic violence, at the first contact with the victim, and provides that the assessment should be comprehensive and continuous. It also contains a standardised risk-assessment form. The prescribed factors cover many of the red flags listed in Question 48, including previous violence, previous emergency or temporary protection measures and their breach, access to firearms, sexual violence, threats to kill, suicide threats, stalking, coercion and controlling behaviour. However, separation/divorce or the break-up of the relationship is not expressly included as a risk factor. Pregnancy is only partially reflected: the framework refers to pregnant women as a particularly vulnerable group and asks whether violence occurred during pregnancy, but does not expressly identify current pregnancy itself as a specific red flag requiring heightened risk assessment. Threats to take away common children are likewise not expressly included.

The main problem, however, is not the absence of a formal tool but its inconsistent use in practice. According to police practitioners, practice differs considerably between police organisational units. Some officers report carrying out the prescribed risk assessment in all cases, while others apply it only where the incident is classified as a criminal offence and not where it is recorded as a complaint or misdemeanour. In some units, the standardised form provided by the Rulebook is not used at all; instead, officers state that they assess risk as part of their routine handling of violent-crime cases. Even where the prescribed form is used, practitioners indicate that the assessment may function more as a formal administrative requirement than as a substantive tool for identifying lethality, escalation and the risk of repeated violence and for determining the necessary protective response.

Risk is not systematically reassessed when circumstances change. A further serious shortcoming concerns reassessment. Although the Rulebook expressly requires risk assessment to be continuous, in practice it is generally carried out once, at the beginning of the case, and is not systematically repeated when circumstances materially change. Changes that may significantly alter the level of risk, for example, the victim leaving the perpetrator, divorce, decisions concerning the custody of children or a change from cohabitation to separation, may therefore not result in a new assessment. This is particularly significant given that separation or the break-up of the relationship is itself not explicitly identified among the prescribed risk factors.

Existing tools remain predominantly oriented towards domestic and intimate-partner violence. Finally, although the Rulebook formally applies to gender-based violence against women as well as domestic violence, the standardised assessment form and many of its indicators are predominantly structured around domestic and intimate-partner violence. There are no equivalent standardised, offence-specific risk-assessment tools demonstrated for the other forms of violence referred to in Question 48, such as stalking outside the domestic-violence context or violence committed in the name of so-called honour.

49. Please specify how effective co-operation is ensured between the different statutory authorities and specialist women's support services in making risk assessments and whether the risks identified are managed by law enforcement agencies on the basis of individual safety plans that include also the safety of the victim's children.

Risk assessment remains institutionally fragmented rather than jointly undertaken. The legal framework provides for co-operation and co-ordination between the Centre for Social Work (CSW) and other relevant institutions. The CSW Rulebook requires risk assessment and risk management to be carried out in co-operation and co-ordination with institutions in the fields of social protection, child protection, internal affairs, health, employment and education. However, this does not amount to a system of joint risk assessment from the outset of the case.

In practice, the police and the CSW largely conduct separate risk assessments. The police framework requires police officers to carry out their own assessment, while the police are required to notify the CSW once a serious risk has already been identified or an emergency protection measure has been proposed. Similarly, under the CSW framework, the multisectoral expert team is convened after the CSW has assessed that there is a risk to the life or health of the victim, or after notification by the police concerning an emergency protection measure.

Thus, the framework provides for co-ordination primarily after risk has already been identified by the individual institution, rather than for systematic early exchange of information and a joint assessment of risk at the first point of contact. As a result, the police and CSW may assess the same case independently, using information available within their respective systems, and the woman may be required to recount the violence separately to both institutions. The weakness therefore arises before risk management begins: institutions assess risk separately before they start managing it together.

Prosecutors and courts are not systematically integrated into risk management. There is an additional gap in relation to the criminal justice system. The existing risk-assessment framework does not establish a structured mechanism for the systematic exchange of risk information with the Public Prosecutor's Office and the criminal courts. In practice, prosecutors and courts are therefore not systematically integrated into risk-management arrangements, even though information concerning the level and dynamics of risk may be relevant to decisions such as pre-trial detention or other measures to secure the victim's safety, as well as to subsequent judicial decision-making and sentencing.

Specialist women's organisations are not systematically involved in early risk assessment. Specialist women's organisations are also not systematically involved in the early risk-assessment process. This is a significant omission because organisations providing direct support to victims may already possess important information concerning previous incidents of violence, coercive and controlling behaviour, threats, the victim's fears, economic dependence and other circumstances relevant to the assessment of risk. Under the current framework, their role is more clearly recognised in the provision of certain support services than as an integral source of information during the initial assessment of risk. For example, the CSW Rulebook permits referral to licensed associations for psychosocial treatment and counselling.

Weak risk assessment undermines individualised safety planning and support. There are also important shortcomings within the CSW risk-assessment process itself. The Rulebook formally links risk assessment with an assessment of the victim's specific needs, the selection of appropriate protection and support measures and services, and subsequent safety planning. The individual

protection plan should be based on the identified risks and should include measures and services adapted to the victim's individual specific needs, including the best interests of the child.

In practice, however, some forms of violence, such as psychological are still insufficiently recognised by CSWs, which may result in risk assessment not being carried out at all. Where assessment is undertaken, the relevant forms may be completed formally rather than being used as a substantive tool for identifying both the level of risk and the victim's specific needs. This is particularly significant in the CSW system because inadequate risk assessment can have a direct negative effect on the entire package of assistance provided to the woman: temporary protection measures, social and psychosocial support, shelter, legal assistance and other services may not be sufficiently tailored to her actual circumstances and needs. Formally, the CSW framework provides for an individual protection plan and, where risk is identified, for a multisectoral safety plan. The plan should be flexible, adapted to changes in risk and needs, and regularly monitored and revised. The safety of children is also expressly incorporated: where a child is a victim, specific measures for the child must be included in safety planning, and the framework also provides for measures concerning temporary care and restrictions on contact with the violent parent where necessary for the child's safety. However, the existence of these formal mechanisms does not ensure that identified risks are consistently translated into effective, individualised safety measures in practice. Weaknesses in the initial assessment, separate institutional assessments, delayed information exchange, inconsistent formation of multisectoral teams and insufficient involvement of specialist women's organisations all weaken the link between risk identification, assessment of needs, safety planning, measures for protection and support.

50. Please describe the efforts made to analyse retrospectively all cases of gender-based killings of women, in the context of domestic violence and other forms of violence against women, to identify the existence of possible systemic gaps in the institutional response of the authorities with the aim of preventing such acts in the future.

No institutionalised retrospective femicide review mechanism has been established. No systematic mechanism has been established for the retrospective review of all gender-based killings of women with the specific purpose of identifying institutional failures and translating the findings into systemic improvements. This is particularly concerning in light of the shortcomings identified above regarding risk assessment, information exchange, co-ordination between institutions, protection measures and the criminal justice response. Following a series of serious and tragic domestic-violence cases, including the recent case involving the death by suicide of a mother together with her child, the competent authorities have reviewed relevant case documentation as part of investigations into the conduct of the institutions and professionals involved. However, such reviews are primarily aimed at determining possible individual responsibility in a specific case, rather than constituting a structured retrospective review designed to identify recurring institutional and systemic failures and to prevent similar cases in the future.

Civil society organisations have also reviewed completed cases of femicide and other fatal outcomes of violence against women. While such analysis is valuable, it cannot substitute for an institutionalised state mechanism with access to complete case files and the authority to require corrective action across the relevant institutions.

What remains necessary is a formal and permanent retrospective femicide review mechanism covering all gender-based killings of women and relevant fatal domestic-violence cases. Such a mechanism should examine the entire institutional response preceding the death, including previous reports of violence, risk assessments, police and CSW interventions, protection measures, prosecutorial and judicial decisions, information exchange and the involvement of support services, and should result in

concrete recommendations and mandatory follow-up aimed at addressing systemic gaps and preventing future deaths.

RECOMMENDATIONS – ARTICLE 51

Relevant 2023 GREVIO recommendations that should be reiterated:

- GREVIO to reiterate its 2023 recommendation to ensure the systematic use of standardised, evidence-based risk-assessment tools for all forms of violence covered by the Istanbul Convention, enabling all relevant risk factors to be identified and responded to both at first contact with the victim and subsequently.
- GREVIO to reiterate its 2023 recommendation to ensure that risk assessment and risk management are central to a co-ordinated multi-agency response in all cases of violence against women, accompanied by adequate training for law-enforcement agencies, the judiciary, Centres for Social Work and other relevant professionals.
- GREVIO to reiterate its 2023 recommendation to monitor and review procedures concerning firearms and to ensure that a perpetrator's possession of or access to firearms is systematically taken into account both in risk assessment and in risk management.
- GREVIO to reiterate its 2023 recommendation to ensure that every risk assessment is followed by protective measures proportionate to the level of risk identified.

Further specification proposed in light of the 2023 GREVIO findings and current developments:

- GREVIO to further specify its recommendation on systematic risk assessment by requiring the prescribed risk-assessment tool to be used in every reported case, irrespective of whether the incident is classified as a criminal offence, misdemeanour or complaint, and by introducing effective supervision to ensure that risk assessment is used as a substantive safety tool rather than as a formal administrative exercise.
- GREVIO to further specify its recommendation on continuous risk assessment by requiring mandatory reassessment whenever circumstances materially change, including separation or divorce, changes in living arrangements, decisions concerning children, escalation of threats or violence, breaches of protection measures, or other developments affecting the level of risk.
- GREVIO to further specify its recommendation concerning relevant risk factors by ensuring that standardised tools expressly include separation or break-up of the relationship, current pregnancy, threats to take away common children and other recognised indicators of lethality, escalation and repeated violence, in addition to existing factors such as previous violence, sexual violence, threats to kill, suicide threats, coercive control and access to firearms.
- GREVIO to further specify its recommendation on all forms of violence against women by developing risk-assessment approaches appropriate to forms of violence beyond domestic and intimate-partner violence, including stalking and other forms of violence covered by the Convention for which the existing domestic-violence-oriented tool may not be adequate.
- GREVIO to further specify its recommendation on multi-agency risk assessment and management by establishing systematic early exchange of information and, where appropriate, joint assessment from the first point of contact, rather than separate police and CSW assessments followed by co-ordination only after serious risk has already been identified.
- GREVIO to further specify its recommendation on multi-agency involvement by ensuring that relevant risk information is systematically shared with prosecutors and courts where it is relevant to decisions affecting women's safety, and that specialist women's organisations are

systematically included in risk-assessment and risk-management processes where they hold relevant information and with due regard to confidentiality and the victim's informed consent.

- GREVIO to further specify its recommendation on risk management by ensuring that identified risks and women's individual needs are directly translated into individualised safety plans and concrete protection and support measures, including measures addressing the safety and best interests of children, and that such plans are regularly reviewed and adapted as risk changes.
- GREVIO to further specify its recommendation on systematic implementation by collecting and analysing data on the number of risk assessments and reassessments conducted, the authorities conducting them, identified levels of risk and the protective measures adopted in response, in order to assess whether the statutory framework is effectively implemented in practice.

Additional recommendation based on the current findings:

- GREVIO to call on the authorities to establish a permanent and institutionalised retrospective femicide review mechanism covering all gender-based killings of women and relevant fatal domestic-violence cases. The mechanism should review the entire institutional response preceding the death — including previous reports, risk assessments and reassessments, police and CSW interventions, protection measures and breaches, prosecutorial and judicial decisions, information exchange and involvement of specialist services — with the purpose of identifying recurring systemic failures and issuing recommendations subject to mandatory institutional follow-up.

ARTICLE 52. EMERGENCY BARRING ORDERS

GREVIO 2023 baseline findings

GREVIO concluded that emergency barring orders meeting the requirements of Article 52 were not effectively available in North Macedonia. The existing mechanism required a police risk assessment and proposal followed by a court decision, creating delays incompatible with the requirement of immediate protection and leaving women exposed during a critical period. GREVIO also identified low and uneven use of the measure and weaknesses in monitoring compliance and sanctioning breaches. It urged the authorities to introduce Article 52-compliant emergency barring orders, provide systematic training to police, Centres for Social Work and judges, review the reasons for their low use and ensure effective enforcement and proportionate and dissuasive sanctions.

Developments since the baseline evaluation

The 2021 Ministry of Interior by-laws and the 2023 Protocol further regulated implementation and co-ordination, but did not change the basic model identified by GREVIO: emergency protection still requires a police assessment and proposal followed by a court decision. The mechanism therefore still does not provide the immediate on-the-spot intervention envisaged by Article 52. Gaps also remain in continuity of protection after expiry, applicability where the woman has already left the home, harmonisation of police notification obligations, use of the measure for forms of gender-based violence other than domestic violence, proactive provision of information to victims and systematic formation of multisectoral teams. Enforcement remains uneven, particularly outside working hours, in serving orders, monitoring compliance and responding consistently to breaches.

51. Have any legislative or other measures been taken to introduce and/or amend the legal framework governing emergency barring orders in order to align it with the requirements of Article 52? If yes, please specify whether:

51. a. emergency barring orders may remain in place until a victim can obtain a court-ordered protection order in order to ensure that gaps in the protection do not arise;

It is important to note that, at the level of the legal framework, emergency protection by the police is enabled through the combined application of police powers under the Law on Police (Article 28), as well as through the emergency protection measure “removal of the perpetrator from the home and prohibition from approaching the home”, in situations where the life and health of the victim and members of her family are endangered. This emergency protection measure was explicitly introduced for the first time in 2015 under the Law on Prevention, Combating and Protection from Domestic Violence. With the adoption of the Law on Prevention and Protection from Violence against Women and Domestic Violence in 2021, the application of this emergency measure was extended to other forms of gender-based violence against women. The emergency protection measure does not automatically remain in force until a temporary protection measure is obtained. It is imposed for a fixed period, and continuity of protection depends on the CSW or the victim initiating proceedings for temporary protection measures. There is therefore a possibility of a protection gap. In practice, police practitioners have reported individual cases in which the 30-day emergency measure expired without the CSW subsequently proposing temporary protection measures, despite an ongoing risk of repeated violence. The police have exclusive authority to submit the proposal for the emergency protection measure and are responsible for its implementation, while the measure itself is imposed by the competent basic court. The police are also required to inform the Centre for Social Work (CSW). The basis for proposing the emergency measure is the risk assessment and the police report, which are submitted to the court together with the proposal for imposing the measure. The manner of conducting the risk assessment and proposing and implementing the emergency protection measure was further regulated by Ministry of Interior by-laws adopted in 2021 and by the Government Protocol on Inter-institutional Co-operation adopted in 2023.

The basic model remains unchanged and does not provide immediate Article 52-compliant protection. No legislative amendment has changed the basic model of the emergency protection measure identified by GREVIO in its baseline evaluation. The measure continues to require a police risk assessment and proposal followed by a court decision. The subsequent by-laws and the 2023 Protocol regulate the implementation and co-ordination of the existing mechanism, but do not transform it into an immediate emergency barring order of the type envisaged by Article 52.

Limited applicability of the emergency protection measure where the victim has already left the home. The emergency protection measure is legally designed as a single cumulative measure consisting of two elements: removal of the perpetrator from the home and prohibition from approaching the home. This creates a practical gap in situations where the victim has already left the shared home and sought safety elsewhere, most commonly with family members. In such cases, removal of the perpetrator from the home no longer responds to the victim’s immediate protection needs, while the police do not have a general mandate to propose a stand-alone prohibition on approaching the victim. Such prohibitions are generally sought as temporary protection measures upon a proposal by the victim or the CSW.

This gap has led to pragmatic solutions in practice. In one police unit, where the victim had already left the home, the police submitted the emergency-measure form to the court requesting only a prohibition on approaching the victim. The court accepted the proposal and imposed the prohibition, although such separate use of only one element of the emergency measure is not expressly provided

for in the legal framework. While this practice enabled immediate protection in the individual case, it also demonstrates a gap in the current legal framework and the need for an emergency measure that can be adapted to the victim's actual circumstances and immediate safety needs.

Police notification obligations are not sufficiently harmonised. A legal analysis shows that the obligation and time limits for police notification of the CSW are not regulated in a sufficiently harmonised manner in the Law, the Ministry of Interior Rulebook and the Government Protocol on Inter-institutional Cooperation. Under the Law, the police are required to notify the CSW immediately, and no later than 12 hours after the intervention, "for the purpose of taking emergency protection measures". The Ministry of Interior Rulebook provides that the police must notify the CSW immediately where a risk of repeated violence has been assessed and must also immediately provide the CSW with the proposal for the emergency protection measure after it has been submitted. By contrast, the Government Protocol requires notification of the CSW in all reported cases: in cases involving a risk to the victim's life and health, notification should be immediate, by telephone, in person or electronically, followed by written notification no later than 12 hours; where there is no serious risk, written notification should be provided within 24 hours. However, the Protocol does not expressly require the police to provide the CSW with the proposal for the emergency measure and the risk assessment. In addition, the existing risk-assessment form corresponds primarily to the circumstances of women survivors of domestic violence and is not adequately adapted to other forms of gender-based violence against women. In practice, the effective implementation of this emergency protection mechanism is still lacking due to its insufficient, inconsistent and uneven application across the country, despite the fact that this emergency protection measure has existed in law for more than ten years. Several factors contribute to this situation.

Insufficient linkage between general police powers for dealing with risk and the specific responsibilities relating to gender-based violence and domestic violence. Police responsibilities regarding the urgent measure of protection were first introduced in 2015. With the adoption of the 2021 Law, these responsibilities were extended to other forms of gender-based violence against women. Before that, the police had already developed practice in taking measures to protect victims where risk was identified, on the basis of their general police powers within the criminal justice protection system, specifically when dealing with violent crime. These existing powers should have been adapted and placed in the service of emergency protection for victims of gender-based violence and domestic violence. In practice, this link has not been sufficiently established. Some police officers continue to assess risk and take risk-management measures as part of their usual handling of violent-crime cases, without giving specific attention to the forms and procedures prescribed by the Rulebook. As a result, there is no common understanding and practice across all Sectors for Internal Affairs concerning the substance of the obligations related to risk assessment and emergency protection measures.

Insufficient awareness among police officers of their specific obligations concerning the emergency protection measure. In particular, some officers are insufficiently familiar with the formal obligations concerning violence against women, including completion of the risk-assessment form, preparation of the police report and submission of the proposal for the emergency measure. There is also insufficient distinction in practice between the emergency protection measure "removal from the home and prohibition from approaching the home", which may be proposed exclusively by the police and is imposed by the competent court, and the temporary protection measure "removal from the home", which is usually proposed by the CSW and implemented by the police.

Lack of consistent practice regarding notification and co-ordination with the CSW. According to the experience of CSW and police practitioners, some police units inform the CSW only about reported

cases registered as criminal offences; others inform the CSW about all reported cases, including complaints and misdemeanours; and in some cases police notification is not timely but is provided periodically, on a monthly basis, covering a larger number of reported cases.

Limited capacities to implement the legal obligations concerning the emergency protection measure. A key challenge is that different police structures and a large number of police officers handle these cases. Some of them, due to the absence of systematic training, do not have sufficient knowledge and skills to conduct a substantive risk assessment, complete the required forms and implement the emergency protection measure. In practice, there are cases where uniformed police officers attending the scene have not consistently carried out all required actions or fully completed the risk-assessment form, which in turn prevents subsequent compliance with the principle of urgency.

Lack of established practice for applying the emergency protection measure to different forms of gender-based violence against women. The shortcomings identified in practice primarily concern domestic violence, as the police have still not developed regular practice in applying the emergency protection measure to other forms of gender-based violence against women, despite their inclusion in the legal framework since 2021 and the relevant amendments to the Criminal Code introduced in 2023.

Lack of systematic formation of multisectoral expert teams to ensure continuity of protection. There is no established practice of regularly forming multisectoral expert teams that should ensure continuity between emergency protection and the temporary protection measures imposed by the court. Cases have been identified in which the CSW did not form a multisectoral expert team even in high-risk situations where the emergency protection measure had been proposed and implemented. This prevents continuity between emergency protection and subsequent forms of protection and support, including temporary protection measures. In this regard, the statement in the State report that the police, in addition to the emergency measure, “prepare and submit proposal to the competent court for further measures” is inaccurate. The police do not have the legal authority to submit proposals for temporary protection measures; this authority rests with the CSW and the women survivors themselves.

51.b. support and advice are made available to women victims of domestic violence in a pro-active manner by the authority competent to issue an emergency barring order;

Proactive information and advice are not consistently provided

Under the national system, the emergency protection measure is issued by the competent court upon a proposal by the police. The obligation to provide immediate information and guidance to the victim, however, rests primarily with the police and the CSW rather than with the court. The Ministry of Interior by-laws require the police, in addition to conducting the risk assessment and implementing the emergency protection measure, to inform victims about the available legal protection mechanisms and possibilities for assistance and support. In practice, however, some police officers are themselves insufficiently familiar with the protection mechanisms, services and rights available to victims within the protection and support system. As a result, the obligation to inform victims is implemented inconsistently and depends to a considerable extent on the knowledge of the individual police officers handling the case. The Ministry of Interior Rulebook does not contain a standardised list of rights, services and protection options to be provided to victims. Positive practices have been identified in some Sectors for Internal Affairs, where victims receive more comprehensive information and are more actively connected with the CSW, but this is not a uniform practice and depends on internal organisation, available resources and other practical conditions. Some police officers simply refer victims to the CSW without providing more detailed information about the role and competences of

that institution. Therefore, although a formal obligation to provide information and guidance exists, proactive and comprehensive provision of support and advice is not ensured consistently in practice.

51.c. children are specifically included in contact bans issued under the emergency barring order;

Children are not expressly included in individual emergency contact bans. Children are taken into account in the risk-assessment and protection framework; however, the emergency protection measure itself is formulated as removal of the perpetrator from the home and prohibition from approaching the home. The reviewed framework does not expressly provide for children to be individually included in a separate contact ban under the emergency protection measure.

51.d. any exceptions to contact bans are made and in which circumstances.

The emergency measure does not regulate a general contact ban or exceptions to it. The emergency protection measure does not establish a general contact ban of the type envisaged in Question 51(d), but a prohibition on approaching the home. Consequently, the reviewed framework does not set out a specific system of exceptions to a contact ban within the emergency protection measure itself. Issues concerning contact with children are addressed through other protection and family-law mechanisms rather than through exceptions to the emergency measure.

52. Please provide information on the measures taken to enforce emergency barring orders and on responses to any violations of such orders.

Enforcement remains uneven and lacks a uniform response to breaches. The practical enforcement of emergency protection measures remains uneven. Practitioner experience indicates a number of obstacles affecting both the timely implementation of the measure and the response where the perpetrator fails to comply with it.

Lack of arrangements for the timely issuing and enforcement of emergency protection measures during weekends, public holidays and non-working days. In some cities, the competent Basic Courts have not consistently ensured the availability of an on-duty judge to deal with requests for emergency protection measures outside regular working hours. This may prevent compliance with the statutory time limits for proposing, issuing and enforcing the measure. At the same time, positive practice has been identified in some areas where a high level of co-ordination between the police and judges has enabled emergency measures to be issued even when the court is not formally operating.

Difficulties in serving the court decision on the perpetrator. Police officers have reported cases in which, after the proposal had been submitted and the emergency protection measure imposed by the court, the perpetrator could not be located in order for the court decision to be served on him. A positive practice has been identified where police officers, using their general police powers in parallel with the specific domestic-violence protection mechanism, retain the perpetrator at the police station until the court has ruled on the emergency measure and release him only after the decision has been formally served. This practice helps to avoid a gap between the issuing of the measure and its effective enforcement.

Insufficient human resources for effective monitoring of compliance with the emergency protection measure. Police officers responsible for these cases are simultaneously required to perform their regular duties. According to practitioners, this can affect the ability of the police to conduct timely and continuous patrols and to maintain regular contact with the victim in order to monitor whether the perpetrator is complying with the measure.

Lack of consistent practice in responding to breaches of emergency protection measures. There is no uniform approach when a perpetrator fails to comply with an imposed emergency protection measure. According to police practitioners, some police officers notify the court of the breach; others consult or co-ordinate with the Public Prosecutor's Office, including in relation to possible detention or other measures; while others rely on general police powers, such as temporarily retaining the perpetrator, in order to provide immediate protection to the woman and her children.

This lack of a uniform response indicates that the existing framework does not provide sufficiently clear and consistently applied operational guidance on how breaches of emergency protection measures should be documented, which authority should be notified, what immediate protective action should be taken, and whether and under what circumstances a breach should result in criminal proceedings or other sanctions.

RECOMMENDATIONS – ARTICLE 52

Relevant 2023 GREVIO recommendations that should be reiterated:

- on the necessary legal or other measures to ensure that emergency barring orders meeting the requirements of Article 52 of the Istanbul Convention are effectively available, enabling swift protection in situations of immediate danger, with the burden of leaving the home placed on the perpetrator rather than on the victim.
- on provision of systematic training to police officers, Centres for Social Work and judges on the purpose, requirements and practical application of emergency barring orders as an immediate safety measure.
- on reviewing the practical use of emergency barring orders, identify and address the factors contributing to their low and uneven use, and ensure their effective enforcement.
- on ensuring that compliance with emergency barring orders is effectively monitored by the police or through other appropriate technical means and that breaches are met with effective, proportionate and dissuasive sanctions.

Further specification proposed in light of the 2023 GREVIO findings and current developments:

- GREVIO to further specify its recommendation on Article 52-compliant emergency protection by reviewing the current legal model, which continues to require a police proposal followed by a court decision, and ensuring that immediate protection can be activated without gaps or delays when an imminent risk is identified.
- GREVIO to further specify its recommendation on continuity of protection by ensuring that an emergency barring order remains effective, or that an immediately available subsequent protection measure is put in place, for as long as necessary to avoid any gap between emergency protection and a court-ordered temporary protection measure.
- GREVIO to further specify its recommendation on the scope of emergency barring orders by ensuring that emergency protection can be adapted to the victim's actual circumstances, including where she has already left the shared home. The legal framework should permit an immediate stand-alone prohibition on approaching or contacting the victim where removal from the home no longer responds to her protection needs.
- GREVIO to further specify its recommendation concerning children by ensuring that children in need of protection are expressly included in emergency contact and approach bans and that their safety is considered independently rather than only through the location of the family home.

- GREVIO to further specify its recommendation on consistent police practice by harmonising the Law, Ministry of Interior Rulebook and Government Protocol concerning when, how and within what time limits the police must notify the Centre for Social Work, including transmission of the relevant risk assessment and information on the emergency measure.
- GREVIO to further specify its recommendation on effective implementation by ensuring that risk-assessment forms, operational guidance and emergency protection procedures are adapted to all forms of gender-based violence against women covered by the law, rather than functioning predominantly as domestic-violence tools.
- GREVIO to further specify its recommendation on training and operational consistency by ensuring that all police officers who may respond to violence against women understand the distinction between emergency and temporary protection measures, can conduct substantive risk assessments, complete the required documentation and initiate the emergency measure without delay.
- GREVIO to further specify its recommendation on continuity of multi-agency protection by ensuring timely formation of multisectoral teams in high-risk cases and a clear transition from emergency protection to subsequent protection and support measures.
- GREVIO to further specify its recommendation concerning victim support by introducing a standardised package of information that police must proactively provide to victims concerning their rights, available protection measures, specialist and general support services and the role of the Centre for Social Work.
- GREVIO to further specify its recommendation on enforcement by ensuring the availability of on-duty judicial arrangements during weekends, public holidays and other non-working periods, effective procedures for serving emergency orders on perpetrators, sufficient police capacity to monitor compliance, and clear operational rules governing the immediate response to breaches, including notification, protective action and referral for criminal or other sanctions.

ARTICLE 53: RESTRAINING OR PROTECTION ORDERS

GREVIO 2023 baseline findings. GREVIO recognised that the legal framework provides a broad range of temporary protection measures independent of criminal proceedings. However, it identified serious shortcomings in their practical operation: responsibility for monitoring rested heavily on already overstretched Centres for Social Work, proceedings were lengthy and cumbersome, women sometimes withdrew from proceedings because of delays and insufficient follow-up, breaches were rarely sanctioned and available data did not permit assessment of effectiveness across different forms of violence. GREVIO urged the authorities to ensure that protection orders are available without gaps following emergency protection, that proceedings are swift and that orders are vigilantly enforced and breaches effectively sanctioned.

Developments since the baseline evaluation. No substantial legislative reform has changed the basic protection-order framework. The principal shortcomings now concern accessibility, judicial practice and enforcement. Temporary protection measures remain predominantly used in domestic-violence cases and practical access depends heavily on recognition and action by Centres for Social Work. Statutory time limits are not consistently respected, proceedings in the perpetrator's absence are difficult to sustain in practice, and some courts apply evidentiary requirements similar to ordinary civil litigation, including demands for evidence of prior police reporting. The full range of available measures is used unevenly. Monitoring remains insufficiently substantive and continuous, measures are rarely reassessed, extended or amended, inter-institutional information exchange is inconsistent and breaches do not always result in timely prosecutorial follow-up.

53. Have any legislative or other measures been taken to introduce and/or amend the legal framework governing restraining and protection orders in order to align it with the requirements of Article 53?

53.a. Availability to women victims of all forms of violence covered by the Istanbul Convention

Practical access remains heavily dependent on recognition and action by Centres for Social Work.

The current law formally extends the system of temporary protection measures beyond domestic violence to violence against women more broadly. However, in practice, the mechanism continues to be used predominantly in domestic-violence cases, and there is insufficient evidence that it is systematically and effectively applied to the full range of forms of violence covered by the Istanbul Convention, including stalking, sexual harassment and digital manifestations of violence. The practical accessibility of protection measures depends to a significant extent on the response of the CSW. More than 95% of proposals are submitted by CSWs. Where the CSW does not identify the conduct as violence, particularly psychological, economic or other less readily recognised forms of gender-based violence, protection measures may not be proposed at all. In addition, the available measures are used selectively. CSWs most frequently propose prohibitory measures, such as prohibitions on threatening, contacting or approaching the victim. Measures requiring positive action by the perpetrator, including removal from the home, payment of maintenance, reimbursement of medical and other costs, counselling or treatment, are used much less frequently. This selective use is also influenced by the absence of sufficiently detailed operational guidance for CSWs explaining the purpose of individual measures and the circumstances in which they should be proposed, as well as by judicial practice requiring more extensive evidence for some of the measures imposing positive obligations on the perpetrator.

Direct access is weakened by barriers to legal aid and confirmation of victim status. Victims may also submit proposals directly. Under the Law on Free Legal Aid, victims of domestic violence are specifically entitled to secondary legal aid, including legal representation in these proceedings, without having to satisfy the general financial and property criteria. Victim status may be confirmed by the CSW or the police. In practice, however, where violence has not been recognised or victim status has not yet been formally established, access to legal aid and therefore to independent initiation of protection proceedings may be delayed or made more difficult. The overall use of the mechanism remains limited. Available statistics should also be interpreted with caution, as they frequently refer to the number of individual measures proposed or imposed rather than to the number of applications or women protected; one application may contain several measures cumulatively.

Urgent protection proceedings are undermined by delays and restrictive judicial practice. Urgent statutory time limits are not consistently respected. Proceedings for temporary protection measures are intended to provide urgent civil-law protection. In practice, however, the statutory seven-day deadline is not consistently met. One of the main reasons is unsuccessful service of documents on perpetrators. Where the perpetrator cannot be located or properly served with the proposal, proceedings are delayed and the protective purpose of the mechanism is weakened.

The possibility of imposing temporary protection measures in the perpetrator's absence is difficult to use in practice. Although the legal framework allows such measures to be imposed without the perpetrator being present, practitioners report that appellate courts have annulled first-instance decisions where the perpetrator was not present, referring to fair-trial considerations. This practice limits the practical use of a mechanism intended to provide urgent protection precisely in situations where the perpetrator is unavailable or avoids participation in the proceedings.

An excessively high evidentiary threshold is applied in some proceedings. Temporary protection measures constitute a specialised mechanism of urgent protection and should not be treated in the same manner as ordinary civil disputes. Nevertheless, some judges apply evidentiary practices similar to those used in ordinary civil litigation and require additional evidence beyond the professional assessment and opinion of the CSW. Of particular concern is the practice identified in some proceedings of requiring evidence that the violence has previously been reported to the police, although the imposition of temporary protection measures is not legally dependent on the initiation of criminal proceedings. This introduces an additional requirement that is not provided for by law and may delay or obstruct access to protection.

This judicial practice also affects the response of some Centres for Social Work. According to practitioners, some CSWs, anticipating that the court may require evidence of a prior police report, refer women to report the violence to the police before proceeding with a proposal for temporary protection measures. This effectively introduces an additional procedural step that is not required by the legal framework. It may also undermine the principle that access to protection and support should not be made dependent on the victim's willingness to engage with criminal justice authorities.

Uneven judicial practice in the types of temporary protection measures imposed. Prohibitory measures are imposed most frequently, while measures requiring the perpetrator to take positive action or to address the consequences of violence – such as maintenance, reimbursement of medical or other costs, counselling or treatment, are used considerably less often. Practitioners also report that courts may require more extensive evidence for these measures, which further contributes to their limited use.

These shortcomings show that the effectiveness of the protection-order mechanism is affected not only by the way cases are identified and prepared by CSWs, but also by judicial practice. Delays, difficulties in proceeding in the perpetrator's absence, excessive evidentiary requirements and uneven use of the full range of available measures can substantially reduce the urgent and protective character of the proceedings.

53.b. Children are specifically included in protection orders

Children can be included in protection orders, but effective protection depends on case-specific measures and information-sharing. Children are commonly included in temporary protection orders where the circumstances of the case indicate that they are also affected by the violence. In practice, this is particularly the case where the mother reports that the violence occurred in the presence of the children. In such situations, prohibitory measures may also extend to the children and to locations connected with them, such as their school, place of residence or other places they regularly attend, in order to prevent the perpetrator from approaching or contacting them. The legal framework also allows the court to impose measures necessary to ensure the safety and well-being of the victim and other family members. The inclusion of children therefore depends on the circumstances of the individual case and on the specific protection measures proposed and imposed. Where protection orders concern places such as schools or other institutions attended by the child, their effective implementation may require timely information-sharing and co-ordination with those institutions so that possible breaches can be identified and reported promptly.

53.c. Exceptions to contact bans

Contact arrangements are adjusted in practice, but exceptions are not regulated in the protection-order framework. The legal framework does not specify general exceptions to contact bans or the circumstances in which such exceptions may be permitted. In practice, where temporary protection

measures also concern the children, the Centre for Social Work adopts a new decision regulating contact between the perpetrator and the children for the duration of the protection measures. Such decisions generally restrict the perpetrator's contact with the children while the measures remain in force. This practice helps to align family-law contact arrangements with the temporary protection measures and to avoid situations in which previously established contact arrangements could undermine the safety of the woman or the children.

54. Please provide information on the measures taken to enforce protection orders and on responses to any violations of such orders.

Monitoring does not systematically assess the actual protective effect of orders. The Centre for Social Work (CSW) has the primary responsibility for monitoring the implementation of temporary protection measures, while the implementation of individual measures may require action by other institutions, including the police, healthcare institutions and, where children are concerned, schools and other relevant services. Monitoring should not be limited to verifying whether the perpetrator formally complies with the imposed measures. It should also include an assessment of their actual impact and effectiveness – namely, whether the measures are achieving their protective purpose, whether the circumstances have changed and whether the victim continues to require the same level and type of protection. In practice, this substantive element of monitoring is largely absent. As a consequence, there is very limited practice of submitting proposals to amend, extend or terminate temporary protection measures. Measures may need to be amended where the circumstances of the case have changed; extended before their expiry where the risk persists or there are indications that the perpetrator may resume violent behaviour once the measure expires; or terminated where their protective purpose has been achieved and the circumstances no longer justify their continuation. In practice, however, such reassessment and adjustment of measures is rarely undertaken. This also explains the lack of meaningful data on the effectiveness of temporary protection measures. Available information generally concerns the number of measures proposed or imposed, but not whether they achieved their purpose, whether risk decreased, whether circumstances changed or whether the measures were subsequently amended, extended or terminated. An adequate system for monitoring compliance with temporary protection measures has not been established. CSWs face significant limitations in carrying out this function due to insufficient human, financial and technical resources and high caseloads. Monitoring is therefore not sufficiently systematic or continuous. The absence of comprehensive statistics on measures that have been amended, extended or terminated further limits the possibility of assessing their implementation and effectiveness.

Inter-institutional information exchange remains inconsistent. Information exchange between the institutions responsible for implementing individual measures remains insufficient. Effective monitoring requires timely information-sharing between the CSW, police, healthcare institutions and other relevant actors. This is particularly important where the measure requires another institution to identify and report possible breaches. For example, where a perpetrator is prohibited from approaching a child, the relevant school may need to be informed in order to recognise and report a violation. In practice, such information exchange and co-ordination are not consistently ensured. The formulation of some protection measures can also make enforcement more difficult. Practitioners have identified cases where prohibitions on approaching the victim are not sufficiently specific as regards the locations or circumstances covered by the measure, which may create difficulties in determining whether a breach has occurred and in responding to it.

Breaches are not followed by a consistently effective institutional response. Responses to violations of protection orders are not sufficiently consistent or effective. Where the CSW establishes that a perpetrator has failed to comply with a court-ordered temporary protection measure, it submits a

criminal report concerning non-compliance with the court decision. In practice, however, CSW practitioners frequently receive no information from the Public Prosecutor's Office regarding the status or outcome of the criminal report. In individual cases, practitioners have also been informed that criminal proceedings would not be initiated. According to the experience of both CSW and police practitioners, the absence of consistent prosecutorial follow-up weakens the effectiveness of the protection-order system. Where breaches are not promptly investigated and followed by an effective response, the protective value of the court order is reduced and the woman may remain exposed to repeated or escalating violence. The available information therefore indicates that the principal weakness is not the absence of a legal mechanism for enforcing temporary protection measures, but the lack of a sufficiently structured system for active monitoring, timely inter-institutional information exchange, detection of breaches, feedback on the action taken and consistent sanctioning of violations. This substantially limits the preventive and protective effect of the measures.

RECOMMENDATIONS – ARTICLE 53

Relevant 2023 GREVIO recommendations that should be reiterated:

- on ensure that temporary protection orders are available for long-term protection without undue delay and are available immediately after an emergency barring order expires, so that no gap in protection arises.
- on ensure that procedures for obtaining temporary protection orders are conducted swiftly and without undue delay.
- on ensure vigilant enforcement of temporary protection orders and that breaches are met with effective, proportionate and dissuasive criminal or other sanctions.

Further specification proposed in light of the 2023 GREVIO findings and current developments:

- GREVIO to further specify its recommendation on practical accessibility by ensuring that temporary protection measures are effectively available for all forms of violence against women covered by the Convention, including psychological, economic, stalking, sexual harassment and digital forms of violence, and that access does not depend in practice on how the violence is initially classified by the Centre for Social Work.
- GREVIO to further specify its recommendation on access to protection orders by ensuring that women can effectively initiate proceedings directly and that neither Centres for Social Work nor courts require prior reporting to the police or initiation of criminal proceedings as a condition for proposing or imposing temporary protection measures.
- GREVIO to further specify its recommendation on swift proceedings by ensuring that statutory time limits are consistently respected, including through effective arrangements for service of documents, and by clarifying judicial practice concerning the imposition of protection measures in the perpetrator's absence so that procedural requirements do not undermine the urgent protective purpose of the proceedings.
- GREVIO to further specify its recommendation on judicial practice by ensuring that temporary protection proceedings are treated as specialised preventive and protective proceedings and that evidentiary requirements are proportionate to their urgent nature. Courts should not apply evidentiary thresholds equivalent to ordinary civil litigation or require proof of prior police reporting where this is not provided for by law.
- GREVIO to further specify its recommendation on the scope of protection measures by developing clear operational guidance for Centres for Social Work and courts on the purpose and appropriate use of the full range of available measures, including not only prohibitory measures but also removal from the home, maintenance, reimbursement of medical and other costs, counselling,

treatment and other measures necessary to address the consequences of violence and prevent recurrence.

- GREVIO to further specify its recommendation concerning children by ensuring that children exposed to violence are expressly covered by protection measures where required for their safety, that contact arrangements with the perpetrator are aligned with protection orders, and that relevant schools and other institutions receive the information necessary to identify and report breaches.
- GREVIO to further specify its recommendation on vigilant enforcement by establishing systematic and continuous monitoring of compliance with protection orders, supported by adequate human, financial and technical resources for Centres for Social Work and effective information exchange with the police, prosecution, healthcare institutions and other actors responsible for implementing individual measures.
- GREVIO to further specify its recommendation on monitoring by requiring regular reassessment of whether protection measures remain effective and appropriate and, where circumstances or risk change, timely proposals to amend, extend or terminate them rather than allowing measures to expire without substantive review.
- GREVIO to further specify its recommendation concerning breaches by establishing clear and consistently applied procedures for documenting violations, promptly informing the competent authorities, investigating breaches and providing feedback to Centres for Social Work on prosecutorial decisions and outcomes.
- GREVIO to further specify its recommendation on implementation and enforcement by collecting harmonised data on applications and women protected, the types of measures requested and imposed, forms of violence concerned, duration of measures, amendments and extensions, breaches, criminal reports, prosecutorial decisions and sanctions imposed, in order to assess whether protection orders are effectively preventing repeated violence.

ARTICLE 56: MEASURES OF PROTECTION

GREVIO 2023 baseline findings. GREVIO found that the criminal-procedure framework formally provides a range of rights and special procedural safeguards for victims, but their practical implementation was unclear and several protections were limited to victims classified as endangered or particularly vulnerable. It expressed concern about insufficient understanding of secondary victimisation, repeated testimony by women victims and the lack of information on the actual use of protective measures. GREVIO also identified specific legal gaps, including the absence of an obligation to inform victims when a perpetrator escapes or is temporarily released. It strongly encouraged effective implementation of all Article 56 safeguards for women and child victims and witnesses throughout investigations and judicial proceedings.

Developments since the baseline evaluation. Important gaps remain between formal procedural rights and their implementation. There is still no established system ensuring that victims and relevant protection authorities are informed when a perpetrator escapes or is temporarily released. Privacy and confidentiality are not consistently protected across all institutions, while procedural and technological measures allowing adult women to testify without direct exposure to the perpetrator remain rarely used. Technical infrastructure for audio-visual recording and remote participation is limited, and arrangements preventing direct contact in courts depend largely on individual practice. Referral to Centres for Social Work does not itself guarantee the legal, psychosocial and specialist

support necessary for women to participate safely and effectively in proceedings, particularly outside larger urban areas and for forms of violence other than domestic violence.

55. Please provide information on the measures taken to ensure the following:

55.a. that the relevant agency informs the victim when the perpetrator escapes or is released temporarily, at least when they or their family might be in danger (paragraph 1(b));

No system ensures notification of victims when perpetrators escape or are temporarily released.

There is no established system ensuring that victims are informed when a perpetrator is temporarily released, granted leave from prison or otherwise becomes temporarily at liberty. The Directorate for the Execution of Sanctions and penitentiary institutions do not have an explicit statutory obligation or established practice of notifying the victim in such circumstances. There is also no systematic mechanism for informing the police that a perpetrator convicted of violence against a woman has been temporarily released, including on weekend or other authorised leave. Consequently, neither the victim nor the police may be aware that the perpetrator is temporarily at liberty, even where there may be a continuing risk to the woman or her family. This represents an important gap in safety planning. Timely information about temporary release or escape is necessary to enable the victim, the police and other relevant institutions to reassess the risk and take appropriate preventive and protective measures.

Protection of the privacy and the image of the victim (paragraph 1(f))

Although confidentiality and protection of victims' personal information are formally recognised, shortcomings remain in practice. As described above, the involvement of several practitioners at the reporting and initial response stages, combined with insufficiently adapted premises and case-management practices, may limit the effective protection of the victim's privacy and identity.

Participants in community focus groups conducted in the context of the preparation of the UN Leave No One Behind analyses reported individual situations in which representatives of the Centre for Social Work discussed the reported violence with a victim at her place of residence in the presence or within hearing of neighbours. Individual cases have also been reported in which perpetrators became aware that the woman had reported the violence to the police.

While the police generally apply confidentiality requirements in their handling of cases, these examples demonstrate that protection of privacy is not ensured consistently throughout the entire institutional response. Clearer operational safeguards are needed to ensure that information concerning the reporting of violence, the victim's location and the actions taken by institutions is disclosed only where strictly necessary.

55.b. the possibility for victims to testify in the courtroom without being present or at least without the presence of the alleged perpetrator, notably through the use of appropriate communication technologies, where available (paragraph 1(i));

Privacy and confidentiality safeguards are not consistently applied across institutions. The possibility for adult women victims of violence to testify without being physically present in the courtroom, or without being in the presence of the alleged perpetrator, is rarely used in practice. Special arrangements and communication technologies are more commonly used in proceedings involving children who are victims of sexual violence, trafficking in human beings or other serious offences. Comparable practices are not routinely available to adult women victims of gender-based violence and domestic violence.

The lack of technical capacity identified at police level is also relevant. Police stations generally lack the equipment necessary to record victims' statements by audio and video in a manner that would reduce the need for repeated questioning and facilitate their subsequent evidentiary use. Similar shortcomings are evident in judicial proceedings. In proceedings concerning temporary protection measures, victims may be required to give evidence directly before the court even where other material evidence is available. This can expose women to unnecessary confrontation with the perpetrator and repeated recounting of the violence. Some courts have developed positive practices aimed at preventing direct contact between the victim and perpetrator before and after the hearing, for example by keeping them physically separated while waiting for the hearing or when leaving the court. However, these arrangements are not established as a systematic nationwide practice and depend largely on the organisation and approach of the individual court. There is therefore a need for a more systematic use of procedural and technological measures that enable women to participate effectively in proceedings without unnecessary exposure to the perpetrator and without increasing the risk of secondary victimisation.

55.c. the provision of appropriate support services for victims so that their rights and interests are duly presented and taken into account (paragraph 1(e)).

Referral to the Centre for Social Work does not ensure effective support throughout proceedings.

This remains one of the more substantial gaps in practice. Police commonly refer victims to the Centre for Social Work, but referral in itself does not ensure that the woman subsequently receives the package of protection, support and assistance necessary to enable her to participate effectively in proceedings and protect her rights and interests.

Uneven geographical availability of specialised services. Specialised shelter and psychological counselling services are available only through a limited number of Centres for Social Work and are concentrated mainly in larger urban areas. Women living in rural and remote areas therefore face additional barriers in accessing these services. Available shelter capacity is also limited, and practitioner findings indicate that some existing facilities are not currently operational.

Insufficient specialised human resources. Centres for Social Work face shortages of professional staff and significant workloads. The same professionals who provide assistance to women victims of violence are frequently responsible for other social-protection functions and other vulnerable groups. This affects the availability, continuity and quality of support provided to victims.

Limited access for victims of forms of gender-based violence other than domestic violence. Existing counselling and shelter arrangements remain predominantly organised around domestic violence. Women subjected to other forms of gender-based violence, including sexual violence, do not have equivalent access to specialised services. Women in particularly vulnerable situations, including women who use drugs, sex workers and trans women, also face additional barriers in accessing protection and support.

Temporary accommodation does not adequately address longer-term protection needs. Shelter is primarily a safety measure and does not resolve longer-term housing or economic dependence. Employed women may also face practical difficulties in combining residence in confidential shelters with continued employment, while some women are reluctant to enter shelters because of isolation from family and other sources of emotional support.

Economic empowerment measures are poorly connected with the protection system. CSWs may refer victims to employment centres, but there is no systematic mechanism for feedback on what assistance was provided, whether the woman benefited from active labour-market measures or

whether employment was secured. Protection and recovery services are therefore insufficiently linked to measures aimed at achieving longer-term economic independence.

Access to social assistance also remains limited. Domestic-violence victims are specifically recognised for certain forms of social assistance, including one-off financial assistance and facilitated access to guaranteed minimum assistance. However, women subjected to other forms of gender-based violence are not equally recognised in the social-protection framework. In practice, the number of women who obtain available financial support is also low, and the assistance provided may be insufficient to meet the actual needs of women and their children after leaving a violent household. Taken together, these shortcomings mean that the formal referral of a victim to the CSW does not necessarily result in effective and individualised support capable of ensuring that her safety, rights and interests are adequately protected throughout the proceedings. A more integrated response is needed, linking legal protection, psychosocial support, safe accommodation, economic empowerment, social assistance and other services according to the individual needs of the woman and her children.

RECOMMENDATIONS – ARTICLE 56

Relevant 2023 GREVIO recommendations that should be reiterated:

- on effectively implement all measures under Article 56 protecting the rights and interests of women and child victims and witnesses throughout investigations and judicial proceedings for all forms of violence covered by the Convention, with particular attention to preventing secondary victimisation.
- on ensure that specialist women's organisations and/or competent state agencies provide legal and psychosocial support and assistance to victims during investigations and judicial proceedings, upon their request, in relation to all forms of violence covered by the Convention.

Further specification proposed in light of the 2023 GREVIO findings and current developments:

- concerning victims' safety by introducing an explicit obligation and clear operational procedure requiring the competent authority to inform the victim promptly whenever the perpetrator escapes, is temporarily released, granted prison leave or otherwise becomes temporarily at liberty, at least where the victim or her family may be at risk.
- by ensuring that relevant information on escape or temporary release is also communicated promptly to the police and, where appropriate, other authorities responsible for protection, so that the risk can be reassessed and necessary preventive and protective measures activated without delay.
- on protection from secondary victimisation by ensuring that adult women victims can effectively make use of procedural measures allowing them to testify without being physically present in the courtroom or without the presence of the alleged perpetrator, including through appropriate audio-visual technologies, whenever necessary for their safety and psychological well-being.
- on procedural protection by ensuring adequate technical infrastructure in police stations, prosecution offices and courts for audio-visual recording and remote testimony and by establishing nationwide arrangements preventing unnecessary direct contact between victims and perpetrators before, during and after hearings.
- concerning privacy and confidentiality by establishing clear operational safeguards ensuring that information concerning the reporting of violence, the victim's identity and location and institutional interventions is disclosed only where strictly necessary and is protected consistently throughout the entire institutional response.

- concerning victim support during proceedings by ensuring that referral to a Centre for Social Work results in an individualised assessment and effective access to the legal, psychosocial and specialist assistance necessary for the woman to understand the proceedings, exercise her rights and participate safely and effectively.
- concerning support services by ensuring that such assistance is practically accessible throughout the country and to victims of all forms of violence against women, including women facing additional barriers, and that specialist women's organisations are adequately supported to provide accompaniment and advocacy during investigations and judicial proceedings.
- on implementation by systematically monitoring the use of Article 56 protection measures, including victim notification following release or escape, use of remote or otherwise protected testimony, measures preventing contact with the perpetrator, access to support persons and specialist assistance, and measures protecting victims' privacy, in order to identify disparities and ensure consistent nationwide practice.

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

Question 56 – New developments since the baseline evaluation

a. Emerging trends in violence against women and domestic violence, including digital manifestations

The findings throughout this report point to the increasing importance of technology-facilitated violence as part of broader patterns of psychological violence, coercive control and post-separation abuse. Police practitioners report cases involving blackmail by former intimate partners using intimate photographs or videos, misuse of images or deepfakes involving girls, stalking and other forms of online abuse. Digital violence is therefore increasingly intertwined with offline violence rather than constituting a separate phenomenon. It can extend abuse beyond physical proximity and enable continued intimidation, monitoring and control after separation.

At the same time, institutional capacity has not kept pace with these manifestations. Police practitioners continue to report difficulties in recognising and legally qualifying technology-facilitated gender-based violence, identifying the competent police unit and securing electronic evidence in a timely manner. More broadly, psychological, economic, sexual and digital violence remain less consistently recognised than physical violence. Administrative data also remain predominantly focused on domestic violence and do not systematically capture these different forms, limiting the possibility of assessing their scale and evolution.

The report also identifies post-separation violence and control as a recurring cross-cutting pattern. Contact concerning children may be used to continue intimidation and control; unpaid or irregular child maintenance may prolong economic dependence and contact with the perpetrator; and lack of stable housing may constrain women's ability to establish an independent life. These findings demonstrate that violence and its consequences frequently continue beyond physical separation and require protection and recovery measures capable of addressing this longer-term dimension.

b. Emerging trends in domestic case law and access to judicial protection related to violence against women

Existing legal protection mechanisms remain insufficiently effective. North Macedonia has two principal judicial pathways for responding to GBV and domestic violence: civil proceedings for temporary protection measures (TPMs) and criminal proceedings against perpetrators. The findings of this report show that neither mechanism is currently functioning to its full preventive and protective potential.

The mechanism of temporary protection measures remains substantially underused. Although the legal framework formally makes TPMs available for violence against women beyond domestic violence, in practice they are applied almost exclusively in domestic-violence cases and remain insufficiently used and ineffective even within that context. Access continues to depend heavily on whether the Centre for Social Work recognises the violence and initiates proceedings, while prohibitory measures are used far more frequently than the broader range of measures available under the law.

The trend of continued increase in reported cases of domestic violence to the police, together with the limited use and weak follow-up of TPMs, shows that this mechanism is not functioning as an effective system-level instrument for preventing repeated violence. Its implementation remains focused on the formal imposition of individual measures rather than on assessing whether those measures actually reduce risk and prevent recurrence.

The monitoring function of Centres for Social Work is particularly weak. Monitoring does not include regular substantive reassessment of whether a measure remains appropriate and effective, whether circumstances or risk have changed, or whether further protection is required. As a result, submitted proposals to the court to amend, extend or terminate TPMs are rarely made, and there are no meaningful consolidated data showing how often such reassessment occurs. Available information only records measures proposed or imposed, rather than whether they achieved their protective purpose. The absence of such reassessment means that the preventive effect of the mechanism cannot be demonstrated in practice.

Civil-court practice further reduces its effectiveness. Statutory deadlines are not consistently respected; service of documents may delay proceedings; proceedings in the perpetrator's absence are difficult to sustain; and some courts apply evidentiary requirements resembling ordinary civil litigation, including requests for evidence of prior police reporting although TPM proceedings are legally independent of criminal proceedings.

The criminal-law response also remains insufficiently effective. The 2026 amendment removing the requirement for a victim's proposal for prosecution of bodily injury committed in the context of gender-based violence, violence against women or domestic violence removed one important legal source of attrition. However, broader weaknesses persist: psychological, economic, sexual and digital violence are still insufficiently recognised and legally qualified; in 2025, 79% of reported domestic-violence cases were registered only as complaints rather than criminal offences or misdemeanours; evidence-building remains overly dependent on the victim's testimony; and attrition continues to be driven by insufficient evidence collection, limited specialisation, weak police–prosecution co-operation and procedural delays.

Even where cases reach judgment, ESE's monitoring shows that suspended sentences remain frequent. Sentencing practice therefore does not adequately reflect the seriousness, recurrence and gendered nature of domestic violence and weakens the effectiveness and dissuasiveness of the criminal-law response.

A further structural problem is the absence of a functioning system for collecting and analysing specific judicial data on violence against women and domestic violence. Although the Ministry of Justice adopted specific by-laws on data collection by courts and public prosecutors in 2022, these obligations have not been operationalised through the court information system. ACMIS still does not enable systematic tagging, filtering and extraction of the required data, which continue to be obtained manually where available. Consequently, the judiciary cannot systematically assess patterns in applications, judicial outcomes, sanctions, duration of proceedings, breaches of protection measures or differences in practice between courts.

Judicial mechanisms remain poorly adapted to the interconnected legal problems faced by women after domestic violence. The overall trend is one of fragmented judicial protection: the legal system provides multiple separate remedies, but does not connect them around the woman's history of violence, safety needs and long-term recovery. Courts lack a functioning data and case-linking system, judges do not systematically know about parallel proceedings, and financial barriers prevent many women from using the full range of available judicial remedies.

Domestic violence rarely generates only one legal problem. Women frequently have to pursue several parallel or successive proceedings concerning temporary protection measures, criminal accountability, divorce, custody and visitation, child maintenance, division of marital property and compensation. ESE's findings show that the judicial system continues to treat these issues largely as separate legal disputes rather than as interconnected consequences of the same history of violence.

A particularly important weakness is that judges dealing with one proceeding do not systematically have information about other parallel proceedings involving the same woman and perpetrator. A judge deciding divorce, custody, maintenance or property issues may therefore be unaware of ongoing or previous protection proceedings, criminal proceedings, risk assessments or other relevant judicial actions. The history of violence and the cumulative legal, safety and economic consequences for the woman are consequently not consistently taken into account across proceedings. The same fragmentation is already visible in custody and visitation cases, where information on previous violence, risk assessments and protection measures does not consistently follow the case into subsequent family-law proceedings.

The consequences are particularly serious in family-law proceedings. Domestic violence is not systematically screened for, psychological and economic violence may be reframed as "disturbed family relations", children who witness violence are not consistently recognised as victims, and risk assessments and previous protection measures are not systematically integrated into decisions on custody and visitation. This allows proceedings concerning parental rights and contact to develop separately from the woman's protection history.

Women also face substantial financial barriers to resolving the full range of legal consequences of violence. Secondary legal aid without a means test is specifically available to women who suffered domestic violence and explicitly in the proceedings for temporary protection measures. For divorce, custody, child maintenance, property division and compensation, women must satisfy the general financial and property criteria. In practice, the mechanism is barely used: none of the women in ESE's analysis only 2 of 29 women in divorce proceedings used it, and none of the women in child-support or custody proceedings did so.

Women are insufficiently informed about court fees, litigation costs and available exemption mechanisms. ESE's analysis shows that very few women use the possibility of exemption, largely because they are unaware of it or not fulfilling the strict criteria (despite their unfavorable financial

situation). Even when exemption is granted, it generally covers court fees, but not the substantially higher costs of proceedings, such as expert assessments, legal representation and evidence collection. Judges consulted by ESE linked this limitation to insufficient court budgets, reflecting a broader structural problem in judicial financing.

These barriers shape which rights women are actually able to pursue. Women tend to prioritise proceedings necessary for immediate safety and everyday life, protection measures, divorce, custody and child maintenance, while property division, compensation and other claims essential for longer-term economic recovery are much less frequently pursued.

c. Emerging trends in the allocation of funding and budgeting

The findings under Article 8 show no transition towards a systematic, needs-based and adequately costed financing model. Expenditure related to violence against women remains embedded within broader institutional budgets, and there is no common methodology for identifying, costing, tracking and reporting such expenditure across ministries and local authorities. Human-resource requirements, workloads, vacancies and territorial distribution of specialised personnel are likewise not systematically incorporated into resource planning.

Financing of specialist women's organisations remains predominantly annual, fragmented and service-specific. Public funding frequently covers selected licensed services rather than the full institutional costs necessary to maintain specialised staff, premises, outreach, accompaniment, interpretation, administration and continuity of support. Donor funding therefore continues to sustain functions that form an essential part of the response to violence against women. Local financing is particularly weak; Open Gate/La Strada's monitoring found no specific local budget allocation for trafficking-victim assistance among the municipalities that responded.

The main trend is thus continuity of fragmented financing rather than development of sustainable multiannual funding linked to assessed needs, statutory responsibilities and actual service costs.

d. Innovative approaches to primary prevention

Awareness-raising and preventive activities have also continued since the baseline evaluation, but prevention remains fragmented across institutions and projects. It is still insufficiently connected with gender equality and women's economic and social empowerment; men and boys are not systematically engaged; women exposed to intersectional discrimination are not consistently reached through adapted approaches; and prevention focuses more strongly on domestic violence than on other forms covered by the Convention.

A particularly important limitation is the absence of systematic impact assessment. Prevention is primarily measured through activities, participation and reach rather than changes in knowledge, attitudes, behaviour, recognition of violence or willingness to seek help. Innovation in communication and educational content has therefore not yet developed into a coherent, continuously financed and evidence-based national prevention system.

e. Emerging trends related to access to asylum and international protection

The report identifies no systemic improvement in the gender-sensitive identification and protection of migrant, asylum-seeking and refugee women experiencing violence. Specialist support for these groups remains insufficiently developed, and barriers include language and communication difficulties, lack of accessible information, insecure migration or socio-economic status, fear of authorities, dependence on others, stigma and discrimination.

Specialised assistance is strongest where trafficking is identified or suspected, through the National Referral Mechanism and specialist services provided by Open Gate/La Strada. However, trafficking-specific mechanisms do not provide an equivalent response to migrant and asylum-seeking women experiencing the broader range of violence covered by the Convention.

The same gap is visible in residence protection. Temporary residence linked to co-operation with the authorities remains specifically available to formally identified victims of trafficking, while no such permits were reported for migrant women on the basis of domestic violence or other forms of violence covered by the Convention. The report also identifies insufficient information on systematic screening for trafficking and gender-based violence among women and girls seeking asylum.

Overall, the findings of this Shadow Report point to three particularly important cross-cutting developments: the growing relevance of digital and post-separation forms of violence; increasing formal recognition of a wider range of violence without equivalent development of institutional capacity to identify and respond to it; and the persistence of fragmented implementation, financing and support despite further development of the legal and policy framework.