

WRITTEN SUBMISSIONS TO GREVIO

Submitted by the Network for Protection against Discrimination
and the Center for Equality and Justice

Introduction

These written submissions were prepared by the Network for Protection against Discrimination, with the contribution of the Center for Equality and Justice. The Network is an informal platform of civil society organizations working on the prevention of and protection against discrimination in North Macedonia, including gender equality and women's rights, as well as gender-based violence and domestic violence. The Network currently consists of nine member organizations and works jointly to prevent discrimination, promote equality and strengthen institutional accountability.

Members of the Network for Protection against Discrimination:

- Helsinki Committee for Human Rights Skopje
- Macedonian Young Lawyers Association
- Association Stronger Together
- Coalition MARGINS
- Stanica PET
- HERA – Health Education and Research Association
- HOPS – Healthy Options Project Skopje
- National network to end violence against women and domestic violence
- Association for Emancipation, Solidarity and Equality of Women – ESE

The Center for Equality and Justice is not a member of the Network but contributed to the preparation of these written submissions, including through its expertise, monitoring and work relevant to the issues covered by the report.

This submission builds upon the 2022 Shadow Report prepared by the Gender Equality Platform and coordinated by the Helsinki Committee for Human Rights, as well as GREVIO's Baseline Evaluation Report adopted in 2023. Rather than reassessing the legal framework in its entirety, the present submission focuses on developments since the baseline evaluation and the extent to which GREVIO's recommendations have been implemented in practice between 2023 and September 2026.

The submission draws on legal aid and strategic litigation, monitoring of institutional responses to violence against women and domestic violence, findings from the Femicide Observatory and multisectoral reviews of femicide cases, information collected by civil society organizations and frontline service providers, as well as available legislation, policies and statistical data.

For clarity, the submission is divided into thematic parts addressing institutional response and access to justice, protection and specialised support services, femicide prevention and risk assessment, children affected by domestic violence, data collection and accountability, and women facing multiple and intersectional forms of discrimination. These areas are closely interconnected and the submission should therefore be read and understood in its entirety. Institutional failures identified in one area often have direct consequences in another, particularly in relation to risk assessment, access to services, protection of children and the prevention of repeated or escalating violence.

While North Macedonia has continued to develop its legal and institutional framework for addressing violence against women and domestic violence, significant gaps remain in its implementation in practice. The findings presented in this submission point in particular to difficulties in ensuring consistent institutional responses, effective risk assessment and protection, sustainable and accessible specialised services, and equal access to protection for women and girls facing multiple and intersectional forms of discrimination.

1. Institutional response and access to justice

General obligations, immediate response, prevention and protection (Articles 49 and 50)

GREVIO Recommendation

(308) GREVIO urges the authorities of North Macedonia to:

- a) Enhance the capacity and knowledge of all law-enforcement officers regarding case building for all forms of violence against women covered by the Istanbul Convention, including timely evidence collection and the promotion and implementation of effective and proactive law-enforcement investigations;
- b) Draw up standard reporting and investigative procedures in relation to all forms of violence against women;
- c) Remove barriers to reporting in particular for women victims of rape and sexual violence, but also for victims of all other forms of violence covered by the Istanbul Convention, including the digital dimensions of such violence, by ensuring a victim-centred and gender-sensitive law-enforcement response to such cases and the implementation of measures to prevent secondary victimisation of the victims;
- d) Remove any regulations or guidelines requiring that women victims are systematically warned that they may be charged for false reporting;
- e) Ensure that law enforcement reacts immediately to reports of violence against women and domestic violence.

(312) GREVIO urges the authorities of North Macedonia to:

- a) Issue guidelines or standard operating procedures to public prosecutors' offices in order to ensure a victim-centered and gender-sensitive handling of all cases of violence against women covered by the Istanbul Convention, including implementing measures to prevent secondary victimization;
- b) Consider setting up adequately staffed, dedicated units within the public prosecutors' offices to investigate and prosecute cases of violence against women and domestic violence;
- c) Ensure that prosecution services enhance their capacity and knowledge regarding case building for all forms of violence covered by the Istanbul Convention, including timely evidence collection; and, furthermore, ensure that they proactively collect and pay due regard to evidence other than the victim's statement, as well as re-examine the practice of withdrawing charges in cases when women victims withdraw their statements;
- d) Ensure that the forensic examination and collection of evidence ordered by the public prosecutor in cases of sexual violence and rape is not considered mandatory for a case to go to trial, and that other evidence is collected to ensure an effective prosecution.

(328) GREVIO strongly encourages the authorities of North Macedonia to:

- a) ensure the systematic use of a standardized, evidence-based risk assessment tool for all forms of violence covered by the Istanbul Convention, in order to enable all relevant risk factors to be timely identified and responded to, when first contact is made with victims and subsequently;
- b) ensure that risk-assessment and management procedures are central to co-ordinated multi-agency responses to violence against women, and to all cases, while stepping up training for law-enforcement agencies, the judiciary and other relevant institutions;
- c) monitor and review procedures and practices related to the confiscation of firearms and to introduce improvements accordingly, including by ensuring that the fact that perpetrators possess or have access to firearms is duly taken into account in the risk assessment and is considered in risk management; d. ensure that risk assessments are invariably followed up by protective measures that are proportionate to the established level of risk

(362) GREVIO strongly encourages the authorities of North Macedonia to effectively implement all measures to protect the rights and interests of women and child victims or witnesses, including to protect them from secondary victimization,

at all stages of investigation and judicial proceedings for all forms of violence covered by the Istanbul Convention, as set out in its Article 56.

Assessment

Implementation of the Criminal Code and institutional response to violence

Since GREVIO's baseline evaluation, important legislative progress has been made in aligning the Criminal Code with the Istanbul Convention. The amendments introduced a consent-based definition of sexual violence and rape and criminalised stalking, sexual harassment and female genital mutilation. These amendments represent an important improvement of the legal framework. The principal concern, however, has shifted from the existence of criminal-law provisions to their consistent implementation by police, public prosecutors and courts.

The experience of victims seeking legal assistance indicates that significant gaps remain between the legal framework and institutional practice. The effectiveness of criminalisation depends on violence being properly identified at the first point of contact, appropriately documented, legally qualified and referred to the competent authorities. Where incidents are treated as isolated events, minor disturbances or family disputes, the broader pattern of gender-based violence and the risk of escalation may remain unrecognised.

This is particularly relevant in police practice. In 2023, the Ministry of Interior registered 1,082 criminal offences related to domestic violence, 321 misdemeanours and as many as 5,300 complaints concerning domestic violence. The large number of events recorded as complaints in comparison with criminal offences raises concerns about what happens following the initial report and whether all reports involving indications of criminal conduct result in an appropriate assessment and further procedure. The experience of victims receiving legal assistance indicates that registration of incidents as complaints without adequate follow-up may contribute to loss of confidence in the protection system.

This concern is reinforced by evidence from the local level. For example, in Prilep, Krivogaštani and Dolneni, 247 cases of gender-based violence were registered by the Ministry of Interior between 2022 and 2025, while 128 cases concerning domestic and gender-based violence were processed by the Basic Court in Prilep. At the same time, interviews with victims and professionals identified fear of the perpetrator, economic dependence, social stigma and distrust in institutions as important reasons why women do not report violence or discontinue engagement with institutions after the initial contact.

Particular attention should therefore be paid to the manner in which police classify individual incidents. Domestic violence is characterised by patterns of repeated and escalating conduct and should not be reduced to an isolated incident of disturbance of public order. An apparently "minor" incident may form part of a much longer history of physical violence, threats, coercive control and psychological abuse. Failure to examine previous reports and the relationship between incidents can prevent the authorities from recognising escalating risk.

The available local evidence also points to insufficient use of immediate protection measures. In the analysed municipalities, only one case of removal of a perpetrator from the home was

recorded during the reporting period, despite the availability of this measure within the legal framework. This raises questions concerning the practical application of emergency measures and whether risk is being assessed consistently at the first point of institutional contact.

The obligation to exercise due diligence is particularly important where a victim subsequently withdraws, does not appear at the police station or states that she does not wish to continue with the report. Such behaviour must be understood in the context of domestic violence, where fear, dependency, coercion and control can significantly affect a victim's ability to pursue proceedings. Where information indicates an offence prosecuted ex officio or a serious risk to the victim, institutional action cannot depend exclusively on the victim's persistence in pursuing the case.

Victims seeking legal assistance continue to report situations in which attempted rape, stalking, harassment and other forms of violence are inadequately addressed, as well as cases in which proposed protective measures are rejected. Such experiences contribute to distrust in institutions and may discourage further reporting. Effective implementation of the Criminal Code therefore requires more than formal criminalisation. Police officers, prosecutors and judges must be able to identify gender-based violence, understand patterns of coercive control and escalation, appropriately qualify offences, assess risk and avoid practices that result in secondary victimisation. Continuous specialised training should be accompanied by monitoring of actual institutional practice and accountability where statutory duties and protocols are not followed.

Concerns regarding secondary victimisation also arise in the interaction between the domestic-violence protection system and social services. Civil-society organisations have identified cases in which women previously recognised as victims of domestic violence have subsequently been subjected to the same proposed protection measures as perpetrators in relation to their children or referred to counselling programmes intended for perpetrators. Where such measures are not based on an individualised assessment establishing violent conduct by the victim, they risk obscuring the distinction between perpetration and reactive behaviour in the context of abuse, shifting responsibility towards the victim and undermining trust in the protection system.

Case of Ivana and Katja – consequences of fragmented and ineffective institutional protection

The case of Ivana J. and her six-year-old daughter Katja J. illustrates, in particularly severe terms, the consequences that may result when repeated incidents of domestic violence are treated individually rather than as an escalating pattern of violence and when information held by different institutions is not brought together into an effective risk assessment.

Ivana and Katja died on 2 March 2026 following several years of physical, psychological and economic violence by Ivana's husband and Katja's father. The subsequent criminal proceedings resulted in a final conviction for bodily injury, endangering security and incitement and assistance to suicide, with a single prison sentence of 12 years. The significance of the case for the implementation of the Istanbul Convention, however, extends beyond the eventual criminal conviction. The central question is whether the deaths could have been prevented through an effective institutional response to the extensive warning signs that preceded them.

Between 2022 and 2 March 2026, domestic violence against Ivana and Katja was reported to the Ministry of Interior 12 times. Reports came not only from Ivana herself but also from her mother, the perpetrator's mother, neighbours and other citizens who witnessed violence. They concerned physical assaults, threats to life and bodily integrity and psychological violence. On one occasion, Katja herself reported that her father was beating her.

The chronology reveals several critical failures.

In January 2025, following a report that Ivana had been beaten, police instructed her to obtain medical documentation and subsequently come to the police station. When she later stated by telephone that she did not wish to report an incident or seek further police action, the report was dismissed. In December 2025, following another report in which the perpetrator's mother stated that he had attempted to kill Ivana and a child could be heard crying and saying that she was also being beaten, Ivana was again instructed to obtain medical documentation and subsequently report to the police station. When she did not appear and could not be reached by telephone, the report was again dismissed.

This approach placed excessive responsibility on a woman living in an ongoing situation of violence to activate and maintain the protection system herself. The authorities had information from independent witnesses and other family members, repeated reports of physical violence and threats, and information concerning violence against a child. The absence or withdrawal of the victim should not have erased the risk already apparent from this information.

A particularly significant incident occurred on 19 December 2025, when a citizen reported a man physically assaulting a woman in a public place in front of her distressed minor child. Police established that the perpetrator had struck Ivana several times in the head and face. Nevertheless, the event was recorded as a misdemeanor under Article 12(1) of the Law on Misdemeanours against Public Order and Peace. Treating an act of intimate-partner violence as a public-order offence obscured its gendered and domestic-violence context and prevented it from being assessed together with the previous reports as part of an escalating pattern.

The case also demonstrates serious deficiencies in inter-institutional information exchange. The Centre for Social Work received information concerning the December incident only on 2 February 2026, despite having already been involved with the family in relation to divorce proceedings. Its subsequent response focused on attempts to arrange meetings with Ivana and the perpetrator. No comprehensive risk assessment for Ivana and Katja was carried out, notwithstanding the obligation of Centres for Social Work to initiate proceedings upon receiving information about domestic violence and to undertake protection measures on the basis of a risk assessment.

There were also clear warning signs concerning Katja. The child had witnessed violence against her mother, had herself indicated that she was being beaten and had disclosed domestic violence at school. The information available to the institutions therefore concerned not only violence against Ivana but also a child directly exposed to and affected by the violence.

The case further raises serious concerns regarding communication between police and prosecution. The case analysis identifies several incidents that were not forwarded to the competent public prosecutor despite indications of offences prosecuted ex officio and despite the

repeated nature of the reported violence. Consequently, the criminal-justice system did not assess the full history of violence as a continuous pattern before the fatal outcome.

On the very day of their deaths, Ivana again contacted the police. In one call, the operator could hear an incident in which she repeatedly asked the perpetrator to stop hitting her. She later called 192 again, crying and asking the police to come quickly. Video footage subsequently showed police officers arriving, identifying Ivana and the perpetrator and leaving.

The subsequent internal investigation is itself indicative of the scale of the institutional concerns. On 31 March 2026, the Ministry of Interior announced that its Sector for Internal Control and Professional Standards had identified failures in the conduct of 39 police officers involved in the case and referred its report for further action to the competent Public Prosecutor's Office.

By contrast, the criminal proceedings initiated after the deaths progressed rapidly: the indictment was submitted on 10 March 2026, the trial began on 30 March, and judgment was delivered on 7 May and became final on 18 June 2026. This demonstrates that the justice system was capable of responding decisively after the fatal outcome. The fundamental protection concern is that a similarly decisive response did not occur during the years in which the risk was repeatedly brought to the attention of state institutions.

The case demonstrates the need to move from incident-based responses towards cumulative and dynamic risk assessment. Every new report should trigger consideration of previous reports, threats, escalation, violence witnessed or experienced by children, separation or divorce proceedings, coercive control and information held by other institutions. The burden of coordinating the protection system cannot be placed on the victim.

The authorities should ensure consistent implementation of the amended Criminal Code and establish systematic monitoring of how police, prosecutors and courts classify and process cases of violence against women. Reports should be assessed in the context of the victim's entire known history of violence rather than as isolated incidents.

Police practice concerning complaints and misdemeanours should be reviewed to ensure that conduct amounting to domestic or gender-based violence is not downgraded to a public-order incident and that information indicating offences prosecuted *ex officio* is promptly transmitted to the public prosecutor.

Risk assessment should be cumulative, dynamic and mandatory, with mechanisms enabling police, prosecution services, Centres for Social Work, health institutions and other relevant authorities to identify previous incidents and exchange relevant information.

Withdrawal of a complaint, failure to attend a police station or reluctance to pursue proceedings should not automatically terminate institutional action where other information indicates domestic violence or a risk to the victim or her children.

Finally, continuous specialised training for police officers, prosecutors, judges and social workers should focus not only on legislation but on coercive control, escalation indicators, trauma-informed communication, secondary victimisation, risk assessment, violence against children and the

practical application of the Istanbul Convention. Training should be accompanied by supervision, monitoring and accountability for failures to apply established standards.

2. Protection and specialised support services

General support services (Article 20)

Specialist support services (Article 22)

GREVIO Recommendation

(160) GREVIO encourages the authorities of North Macedonia to improve access of victims of domestic violence and violence against women to services facilitating their autonomy, and to continue implementing the dedicated programmes that cater to their specific needs in the areas of employment, training and housing, thus contributing to their recovery, economic independence and empowerment.

(183) GREVIO urges the authorities of North Macedonia to:

- a) Increase the number and capacity of appropriate and easily accessible shelters providing safe accommodation for victims of all forms of violence covered by the Istanbul Convention;*
- b) Ensure that shelters are available in an adequate geographic distribution;*
- c) Ensure that all women victims of gender-based violence and their children have access to shelters, regardless of whether they want to report the violence they have suffered to the authorities and also ensure that they are offered a possibility to self-refer;*
- d) Develop minimum quality standards for services provided in shelters, in close co-operation and in consultation with women's NGOs, based on a gendered understanding of violence against women, the empowerment of victims and a victim-centred and human rights-based approach, and taking into account promising practices developed internationally;*
- e) Ensure sustainable funding of and sufficient human resources for the shelters;*
- f) Introduce and provide ongoing and specialised training for staff.*

Assessment

Availability and effective accessibility of specialised services

GREVIO's baseline evaluation identified important shortcomings in the availability, geographical distribution, accessibility and sustainability of specialist support services for women victims of violence. Developments since the baseline evaluation indicate that the existence of formally established services does not necessarily mean that women can effectively access specialised, continuous and adequately resourced support.

This distinction between formal establishment and actual functionality remains essential. Specialist services must be available in practice, adequately staffed, accessible within a reasonable distance, capable of responding without delay and sufficiently funded to provide continuous support. A service that exists administratively but lacks specialised staff, operates with limited capacity or cannot provide the required intervention cannot be regarded as fully accessible in practice.

Evidence from the Pelagonia region demonstrates this gap. In Prilep, a crisis centre and counselling service for victims of domestic violence have formally been established, but they do not operate at full capacity because of insufficient specialised personnel. In Bitola, facilities intended for women victims of gender-based and domestic violence have been established, yet the accommodation facility was reported not to be used for its intended purpose, while a counselling service, although physically established, was not functional and had not provided services for the purpose for which it had been created.

The absence of locally available shelter accommodation remains particularly problematic. Victims from Prilep and the surrounding municipalities must be referred to shelter accommodation in Bitola. The local data show very limited use of shelter accommodation: one woman and two children were accommodated in 2022 and one woman and three children in 2024, while no placements were recorded in 2023 or 2025. This requires examination not simply as a question of demand, but of whether geographical distance, awareness, referral practices, accessibility and confidence in the service prevent women from using shelter protection when needed.

The situation is even more limited in rural municipalities. Available information from Krivogaštani and Dolneni indicates an absence of locally established specialised services, local programmes and dedicated financial measures for the prevention of and protection from gender-based and domestic violence. The result is a system in which access to protection may depend significantly on where a woman lives. This is particularly problematic for women in rural areas who already face transportation barriers, economic dependence, social pressure and reduced proximity to institutions.

At the same time, civil-society organisations continue to fill significant gaps in the public service system. Local organisations provide psychosocial support, legal assistance, accompaniment and economic empowerment. Such services demonstrate both their necessity and the continuing unmet demand for specialised assistance. However, their sustainability remains heavily dependent on external project funding rather than predictable public financing.

This is particularly visible in psychosocial services. In 2025, a local specialised service in Prilep provided individual counselling and emotional support to women and children affected by gender-based and domestic violence. However, these services were financed exclusively through donor funding. Reliance on short-term project financing creates uncertainty for both service providers and victims and makes continuity dependent on the availability of future donor projects rather than on the needs of women. Specialist services required under the Convention should form part of a stable protection system and should not depend predominantly on temporary external funding.

Licensing and financing of specialised services

The licensing framework for specialised services should contribute to quality and accountability without creating financial conditions that undermine the sustainability of women's specialist organisations. The requirement to maintain qualified professional staff must be accompanied by a financing model capable of covering the actual fixed costs of providing a specialised service.

A financing system based primarily on the number of individual services delivered creates particular difficulties for specialised services that must maintain trained personnel and readiness even during periods in which fewer victims seek assistance. Such an approach risks incentivising quantity rather than continuity and quality and does not adequately recognise that maintaining a specialised service itself entails permanent staffing, premises, supervision, safety and operational costs.

Public financing should therefore move towards predictable and sustainable support, including multiannual and institutional funding for specialised women's organisations that meet established quality standards. Funding mechanisms should enable organisations to retain specialised personnel and provide continuous services rather than requiring them to repeatedly reconstruct services around short project cycles.

Municipal responsibility is equally important. Local authorities have a role in ensuring that women can access protection in their own communities. Yet available local evidence shows significant differences in engagement. In Prilep, although some funds were identified for gender-equality and violence-prevention activities, the available information did not allow assessment of how much was specifically dedicated to GBV/DV services or what results were achieved. Krivogaštani and Dolneni reported no dedicated local services or financial allocations during 2022–2025. Such disparities undermine equal access to protection.

Sexual violence services

Access to specialised services for victims of sexual violence remains an area requiring particular attention. Sexual violence continues to be severely under-reported. In the analysed municipalities of Prilep, Krivogaštani and Dolneni, only two cases of sexual violence were recorded in official police data during the entire analysed period, while interviews with victims and professionals indicated that sexual violence was present in the community. The discrepancy strongly indicates barriers to recognition and reporting rather than an absence of sexual violence.

Effective implementation of Article 25 of the Istanbul Convention requires more than emergency medical intervention. Victims should have timely access to medical and forensic examination, trauma-informed psychological assistance, counselling and longer-term support without being subjected to unnecessary referrals or procedures that increase secondary victimisation.

Specialised sexual-violence services should therefore be geographically expanded and designed as integrated services through which a victim can access medical, forensic, psychological and referral support in one place. Services must be available around the clock and staff must receive continuous training in trauma-informed and victim-centred responses. The availability of longer-term psychosocial support is particularly important, since the needs of survivors do not end after the immediate medical intervention.

Accessibility and equality of protection

The geographical distribution of services remains directly connected to equality of access. Women living outside Skopje and larger urban centres should not have to travel substantial distances in order to obtain emergency accommodation, specialised counselling or sexual-violence support.

Accessibility must also be understood more broadly than physical distance. Services should be practically accessible to women with disabilities, Roma women, women from rural communities, women experiencing poverty and other women facing intersecting barriers. Information about available services must be understandable and accessible, and transportation and immediate practical needs should not become barriers preventing women from leaving violent environments.

The current evidence therefore indicates that progress in establishing services has not yet resulted in a uniformly functional, geographically accessible and financially sustainable network of specialist support. The next stage of implementation should focus not on the number of services formally established, but on whether a woman can actually reach and use an appropriately staffed specialist service when she needs it and continue receiving support for as long as necessary.

3. Femicide prevention and risk assessment

State obligations and due diligence (Article 5)

(34) GREVIO urges the authorities of North Macedonia to:

- a) Step up measures to identify and remedy gaps in the institutional response to violence against women, in accordance with their duty of due diligence;*
- b) Hold to account state actors for failure to comply with the obligation to diligently prevent, investigate and punish acts of violence covered by the Istanbul Convention and to protect victims. Progress in this area needs to be measured by collecting data on such cases and their outcome;*
- c) Analyze all cases of gender-based killings of women, with the aim of identifying possible systemic gaps in the institutional response to cases of violence and preserving the safety of women.*

Assessment

Femicide remains one of the most serious manifestations of gender-based violence in North Macedonia. It also continues to expose weaknesses in the institutional response to domestic violence, particularly where there have been previous reports of violence, contact with several institutions and opportunities for earlier intervention.

In its baseline evaluation, GREVIO raised concerns about the absence of a systematic mechanism for reviewing gender-related killings of women and identifying possible failures in the institutional response. It called on the authorities to analyse such killings in order to identify systemic gaps and prevent similar cases in the future. GREVIO also identified shortcomings in risk assessment and risk management. Risk assessments were not systematically carried out, cooperation between the police and Centres for Social Work was insufficient, and it was unclear to what extent relevant risk information reached prosecutors and courts. GREVIO therefore strongly encouraged the authorities to ensure systematic use of standardised, evidence-based risk assessment and to make risk assessment and risk management part of a coordinated multi-

agency response. Importantly, the identification of risk should be followed by protection measures proportionate to that risk.

The available data underline the importance of these recommendations. According to Ministry of Interior data obtained in the process of establishing the Femicide Observatory, 67 femicides and 48 attempted femicides were recorded between 2014 and 2024, resulting in 115 cases that fall within the scope of the retrospective review currently being conducted. Eurostat data for 2023 also placed North Macedonia among the European countries with a high reported rate of women killed by intimate partners, with six women killed by intimate partners per million inhabitants.

Establishment of the Femicide Observatory

An important development since GREVIO's baseline evaluation has been the establishment of the Femicide Observatory, implemented by the Helsinki Committee for Human Rights and the National Network to End Violence against Women and Domestic Violence, with support from the OSCE Mission to Skopje. The Observatory was established precisely in response to the need for systematic monitoring of femicides and attempted femicides and for closer examination of the institutional response preceding these cases.

As part of this process, Memoranda of Cooperation were concluded with the Ministry of Interior, Ministry of Justice, Public Prosecutor's Office, Council of Public Prosecutors, Judicial Council and Ministry of Social Policy, Demography and Youth. A Multisectoral Working Body was established, bringing together state institutions, the judiciary, prosecution, police, independent bodies and civil society. Its first meeting was held on 4 September 2025. The Observatory formally started its work in September 2025.

The significance of this mechanism is that its work goes beyond counting the number of women killed. The methodology examines the history of each case, including previous violence and reports, protection measures, institutional actions, the relationship between the victim and perpetrator, legal qualification and the outcome of proceedings. A retrospective review of femicides and attempted femicides for the period 2014–2024 is being conducted across the country.

The Femicide Watch Platform was also presented in November 2025 as the public component of this mechanism. It is intended to provide anonymised and verified information on femicides and attempted femicides and to make patterns in previous violence and institutional responses more visible. The platform and the work of the Observatory are particularly important because many cases cannot be understood only by examining the final act of violence. What happened before the killing, previous reports, threats, police interventions, protection measures and contacts with social services, may show where opportunities for prevention existed.

During 2026, the work has continued with the completion of the nationwide review of femicides and attempted femicides from 2014 to 2024, further operationalisation of the Multisectoral Working Body and the platform, and monitoring of court proceedings. The review is intended to identify recurring risk factors, institutional omissions and gaps in prevention and protection across cases. An analysis based on the reviewed femicide and attempted-femicide cases is being

prepared and is expected to be published by the time of GREVIO's evaluation visit in October 2026. It should provide a more comprehensive picture of recurring institutional failures and risk factors and will therefore be an important additional source for assessing implementation of GREVIO's recommendations.

The establishment of the Observatory is an important step forward, but cases occurring since GREVIO's baseline evaluation continue to show why risk assessment and institutional coordination remain critical. The femicide of Rosica Koceva in Veles in September 2025 was one of the first cases examined through the new mechanism. An extraordinary meeting of the Multisectoral Working Body was held following the killing to reconstruct the chronology of events and examine the institutional response. Disciplinary proceedings were subsequently initiated against 11 police officers in relation to failures in previous interventions. The case became a pilot for applying the Femicide Watch methodology and demonstrated the importance of reviewing not only the killing itself, but the institutional response that preceded it.

The Ivana and Katja case, discussed in greater detail in the first part of this submission, is also relevant to femicide prevention and risk assessment. Their deaths in March 2026 were preceded by 12 reports of domestic violence between 2022 and 2026, involving repeated institutional contacts and indications of escalating violence. Following their deaths, the Ministry of Interior identified failures in the conduct of 39 police officers, while the criminal proceedings resulted in a final conviction and a 12-year prison sentence for the perpetrator. The case demonstrates the importance of assessing repeated reports cumulatively, ensuring timely information-sharing between institutions and translating identified risks into concrete protection measures.

Despite this history, the incidents were not brought together into an effective cumulative assessment of the danger faced by Ivana and her daughter. One particularly concerning incident occurred in December 2025, when a citizen reported that Ivana was being beaten in public in front of Katja. Although the police established that she had been struck several times in the head and face, the incident was recorded as a misdemeanor relating to public order. The Centre for Social Work was informed only later, and no adequate risk assessment covering both Ivana and Katja followed.

There were further warning signs in the months before their deaths, including reports of threats and violence and an incident in January 2026 in which Ivana was pushed down stairs. On the day of her death, Ivana again contacted the police asking for urgent assistance. During one of the calls, the operator could hear her asking the perpetrator to stop hitting her. Police officers attended the home but left after speaking with the persons present.

The criminal proceedings against the perpetrator subsequently resulted in a final conviction and a sentence of 12 years' imprisonment for bodily injury, endangering security and incitement and assistance to suicide. The judicial outcome established individual criminal responsibility, but it did not resolve the wider question of why the history of violence and repeated institutional contacts had not resulted in effective protection before the deaths.

The response of the institutions after the case is therefore also relevant. An internal-control investigation by the Ministry of Interior identified failures in the conduct of 39 police officers who had previously dealt with reports concerning domestic violence by the perpetrator, and the matter

was referred to the competent Public Prosecutor's Office for further assessment. This is an important accountability measure, but the findings should also be used to identify what needs to change in police practice, supervision, risk assessment and interinstitutional communication.

The case of Ivana and Katja demonstrates that the problem is not necessarily the absence of information. Institutions may have considerable information about violence, but prevention depends on whether that information is connected, assessed and acted upon. Repeated reports should not be treated as unrelated incidents. A history of violence, escalation, threats, violence in front of or against children, repeated police interventions and other relevant indicators should form part of a continuously updated assessment of risk.

This is also why the distinction between risk assessment and risk management is important. Completing a risk-assessment form does not in itself protect a woman. Once a serious risk is identified, there must be a timely decision on what is necessary to reduce it, including emergency and temporary protection measures, removal of the perpetrator where appropriate, protection of children and rapid exchange of information between the police, Centres for Social Work, prosecution and other relevant institutions.

GREVIO's concerns regarding emergency protection measures therefore remain closely connected to femicide prevention. In its baseline evaluation, GREVIO raised concerns about the speed and use of emergency barring and temporary protection measures and called for measures capable of providing immediate protection. Risk assessment has limited preventive value if the institutions involved are unable or unwilling to translate the identified risk into effective action.

The establishment of the Femicide Observatory provides an opportunity to address some of these shortcomings systematically. For the first time, femicides and attempted femicides are being reviewed across institutions using a common methodology rather than being considered only as individual criminal cases. The mechanism also creates space for civil society and institutions to examine where protection failed and what could have been done differently.

At the same time, the Observatory is still a new mechanism. Its long-term value will depend on whether it becomes sustainable, whether institutions continue to provide access to the necessary information, and, most importantly, whether its findings lead to changes in practice. The 2026 project documentation itself recognises that fragmented data, inconsistent institutional responses and limited risk-assessment practices continue to present difficulties.

There are also practical problems with the available data. During the retrospective review, for example, it was found that the case-management system of the Basic Criminal Court Skopje could not filter cases according to the gender of the victim or specifically identify killings related to gender-based or domestic violence. Cases therefore had to be screened manually to identify those relevant to the femicide review. Better and harmonised data collection across the police, prosecution, courts and social services remains necessary.

Overall, the establishment of the Femicide Observatory and the Multisectoral Working Body represents clear progress since GREVIO's baseline evaluation. What remains to be seen is whether the findings from the Observatory will be translated into changes in day-to-day institutional practice. The cases reviewed so far, and particularly the cases of Rosica Kocева and

Ivana and Katja, show that repeated reports of violence, known histories of abuse and contact with several institutions do not necessarily result in effective protection.

The authorities should therefore ensure that risk assessment is systematic, continuous and based on the full history of violence rather than the latest incident alone. Information held by different institutions should be exchanged in time, and every serious or escalating risk should lead to concrete and proportionate protection measures. Emergency and temporary protection measures should be available and implemented without delays that leave victims exposed.

The Femicide Observatory should also be secured as a sustainable mechanism beyond project-based funding. Reviews of femicides and attempted femicides should continue regularly, findings and recommendations should be communicated to the responsible institutions, and there should be follow-up on whether recommendations have actually been implemented. The forthcoming analysis of the reviewed cases should provide an important basis for this work and for GREVIO's assessment during its October 2026 visit.

4. Children affected by domestic violence

Custody, visitation rights and safety – Article 31

GREVIO recommendation

GREVIO urges the authorities of North Macedonia to take the necessary measures, including legislative amendments, to ensure that courts, Centres for Social Work and any other relevant authorities are under an obligation to:

- a) Take into account incidents of violence, including violence by one parent against the other and witnessed by the child, when determining custody and visitation rights;*
- b) Monitor the practice of the courts and the Centres for Social Work in that respect;*
- c) incorporate risk-assessment and risk-management procedures into the determination of custody and visitation rights, and restrict these rights where this is warranted to guarantee the safety and best interests of the child and the safety of the non-abusive parent;*
- d) Ensure children's safety in conditions that allow them to remain with the non-abusive parent, preferably in their own home;*
- e) Ensure that all relevant professionals, especially staff from the Centres for Social Work and judges in civil courts, are trained in the area of domestic violence and equipped with guidelines to enable them to discharge their obligation to ensure the safety of victims and their children in any decisions taken, including by actively seeking information from women's support services, law enforcement and other relevant organisations.*

Assessment

In its baseline evaluation, GREVIO urged the authorities to ensure that incidents of violence, including violence by one parent against the other and witnessed by the child, are taken into account when determining custody and visitation rights. GREVIO further called for risk-assessment and risk-management procedures to be incorporated into such decisions, for custody

and visitation rights to be restricted where necessary to guarantee the safety of the child and the non-abusive parent, and for relevant professionals to receive adequate training and guidelines.

Despite the existing legal recognition of children who witness domestic violence as victims, important gaps remain in ensuring that exposure to domestic violence is systematically taken into account in decisions concerning parental responsibility, custody and contact with children. The Law on Prevention and Protection from Violence against Women and Domestic Violence recognizes as a victim a child who experiences violence directly, witnesses violence between family members or lives in an environment in which violence occurs. The legal framework also allows Centres for Social Work to temporarily restrict or prohibit personal relations and direct contact between a child and the parent with whom the child does not live where this is necessary in the child's best interests. However, such restrictions are temporary and may not exceed one year.

The best interests and rights of the child

The implementation of GREVIO's recommendation should be considered together with North Macedonia's obligations under the UN Convention on the Rights of the Child. Article 3 of the Convention requires that in all actions concerning children, including those undertaken by social welfare institutions, courts and administrative authorities, the *best interests of the child shall be a primary consideration*. This principle is particularly important in proceedings concerning custody, parental responsibility and contact arrangements.

The best interests of the child should not be interpreted merely as one consideration to be balanced against competing parental interests. The child is an independent holder of rights. Consequently, proceedings concerning custody and contact must begin from the rights, safety, well-being and individual circumstances of the child, rather than from an assumption that the exercise of parental rights or maintaining contact with both parents should prevail. The UN Committee on the Rights of the Child has clarified that the best interests of the child constitute a substantive right, a fundamental interpretative principle and a rule of procedure. A determination of the child's best interests must therefore be individualised and based on the circumstances of the particular child, including the child's safety, physical and psychological integrity, views, experiences, family environment and exposure to violence.

This is particularly relevant in cases of domestic violence. The right or interest of a parent to maintain contact with a child cannot be placed above the child's rights to safety, protection from violence, healthy development and psychological integrity. Parental rights and responsibilities exist in relation to the child and must be exercised consistently with the child's rights and best interests. Where the exercise of contact, custody or other parental rights exposes a child to violence, fear, coercive control, retraumatisation or other harm, the protection of the child must take precedence.

The right of the child to maintain relations and contact with both parents should therefore not be interpreted as an unconditional obligation to maintain contact. The Convention on the Rights of the Child itself recognises this distinction: contact with both parents is protected except where

such contact is contrary to the child's best interests. In cases involving domestic violence, the question should consequently not be whether a parent has a general entitlement to contact, but whether and under what conditions such contact is compatible with the rights, safety and best interests of the individual child.

This requires particular attention to children who have witnessed violence against their mother or another non-abusive parent. Such children should not be treated as unaffected third parties merely because the violence was not directed physically against them. Exposure to domestic violence is itself relevant to their safety, psychological well-being and development and must form part of any assessment of their best interests.

The broader family-law framework does not provide sufficiently explicit safeguards to ensure that domestic and gender-based violence is systematically considered when determining parental responsibility, custody and visitation. This concern is particularly relevant in the context of proposals concerning shared parental responsibility following divorce, in the new Family Law. Provisions based on the joint and consensual exercise of parental responsibilities may create significant protection gaps where they do not expressly provide for domestic and gender-based violence as a circumstance requiring a different approach to parental responsibility.

A presumption in favour of shared parental responsibility must therefore never override an individual assessment of the child's best interests. Equality between parents in the exercise of parental responsibility cannot mean equality at the expense of the child's safety and rights, particularly where there is a history of violence, abuse or coercive control.

Domestic violence should furthermore not be treated as relevant to custody and contact arrangements only where criminal proceedings have been initiated or where the violence has resulted in a conviction. Such an approach risks excluding cases in which violence has not been formally reported or prosecuted, despite a documented history or identifiable indicators of abuse. The assessment of the best interests of the child should include available information concerning previous and ongoing violence regardless of whether criminal proceedings are pending or have been completed.

Concerns regarding the identification of victims and perpetrators

Recent civil-society monitoring has identified a concerning practice in the manner in which some Centres for Social Work assess domestic violence in cases involving children and propose temporary protection measures to the competent courts. In several cases known to civil-society organisations, although the woman had previously reported domestic violence, provided medical or other documentation of violence against herself and/or the children and sought institutional protection, measures directed at the perpetrator were accompanied by an identical measure prohibiting both parents from committing violence against the children.

While children must be protected from all forms of physical and psychological violence, their exposure to domestic violence should not automatically result in the parent who is a victim of intimate-partner violence being treated as a perpetrator of violence against the child. Such an approach risks presenting domestic violence as a conflict between two equally responsible

parents and obscuring the distinction between the perpetrator, the victim and children affected by the violence.

This is particularly problematic where the victim's behaviour is reactive to the violence she is experiencing. Responding verbally to threats or insults, raising one's voice, attempting to defend oneself or otherwise reacting in the context of violence does not in itself establish mutual violence or equal responsibility. Institutional assessments should examine the history and context of the violence, patterns of power and control, repetition and intensity, its consequences and the risk of recurrence, and should distinguish perpetrating behaviour from reactive or protective behaviour by a person subjected to violence.

Where there is evidence that the non-abusive parent has independently committed physical or psychological violence against the child, appropriate child-protection measures should of course be taken. However, such a conclusion should result from a separate, individualised and reasoned assessment of that parent's conduct. It should not be presumed merely because the child witnessed violence between the parents or because the victim reacted to the perpetrator's violent behaviour.

Of particular concern is the reported practice of referring some victims of domestic violence to counselling programmes intended for perpetrators. Such programmes have a specific purpose and methodology aimed at changing violent patterns of behaviour and preventing further violence. Referral to a perpetrator programme is therefore not a neutral counselling intervention. Where a victim is referred because she responded to the perpetrator's messages, reacted verbally, raised her voice or otherwise behaved reactively in the context of threats, intimidation or violence, there should first be an individualised professional assessment establishing the conduct on the basis of which she is being treated as a perpetrator.

In the absence of such an assessment, the victim may not only be formally equated with the perpetrator but also subjected to an intervention premised on the need to change her own violent behaviour. This creates a risk of revictimisation, displacement of responsibility for the violence onto the victim and erosion of trust in institutional protection.

This practice may also have consequences for subsequent decisions concerning parental responsibility, custody and contact. Assessments that fail to distinguish between the perpetrator and the victim may influence how both parents are subsequently perceived by Centres for Social Work and courts. It is therefore necessary to ensure clear and uniform professional guidance requiring an individualised and gender-sensitive assessment of the dynamics of domestic violence before measures concerning children, parental responsibility or referral to perpetrator programmes are proposed.

Post-separation violence and the use of contact arrangements

Separation does not necessarily end domestic violence. On the contrary, arrangements concerning children may provide opportunities for the perpetrator to maintain contact with and exercise control over the non-abusive parent. Children may be used as a means of continuing coercive and controlling behaviour, including through threats concerning custody, removal of

children, repeated proceedings or the use of contact arrangements to maintain access to the victim.

Decisions concerning custody and visitation must therefore assess not only the direct risk of physical violence against the child, but also the broader pattern of violence and coercive control affecting both the child and the non-abusive parent.

The child's own views must also be appropriately considered. Where a child refuses or demonstrates significant resistance to contact with a parent in a context where domestic violence has occurred, the reasons for such behaviour should be carefully assessed by appropriately trained professionals. A child's reluctance to maintain contact should not automatically be attributed to the influence of the other parent without first examining possible exposure to violence, fear, trauma or other safety concerns.

Risk assessment and institutional response

In this context, the absence of mandatory and standardised risk-assessment and risk-management procedures specifically integrated into custody and visitation proceedings remains a significant concern. Such procedures should identify risks to both the child and the non-abusive parent and take into account previous reports of violence, protection measures, criminal proceedings, information held by the police and Centres for Social Work, as well as information available to health institutions, educational institutions and specialised women's support services.

Where such an assessment identifies a risk to the safety or well-being of the child or the non-abusive parent, the authorities should be able to restrict, supervise or suspend contact. The protection of the child and the non-abusive parent should take precedence over an assumption that maintaining contact with both parents is necessarily in the child's best interests.

Effective implementation of GREVIO's recommendation also requires systematic exchange of information between the institutions involved. Courts and Centres for Social Work should actively seek relevant information from law-enforcement authorities, prosecution services, health and educational institutions and specialised women's support services before making decisions concerning parental responsibility, custody and contact where there are indications of domestic violence.

Importantly, decisions concerning children should demonstrate how the child's best interests were actually assessed. A general reference to the "best interests of the child" cannot substitute for an individual assessment of the child's circumstances, exposure to violence, safety, psychological condition and views.

Accordingly, further legislative and institutional safeguards are necessary to fully implement GREVIO's recommendation under Article 31 of the Istanbul Convention and North Macedonia's obligations under the Convention on the Rights of the Child. Any reform concerning parental responsibility should proceed from the principle that children are independent rights-holders and that parental rights cannot be exercised in a manner that compromises the child's rights, safety and best interests.

5. Data collection and accountability (Articles 10, 11 and 29)

(61) GREVIO strongly encourages the authorities of North Macedonia to ensure, on the one hand, the co-ordination and implementation of policies and measures to prevent and combat all forms of violence against women, and, on the other hand, their independent monitoring and evaluation, supported by appropriate and reliable data.

(73) Bearing in mind the need for data collection to apply to all forms of violence covered by the Istanbul Convention, GREVIO urges the authorities of North Macedonia to take the necessary measures, including any necessary legislative amendments establishing the duty of statutory agencies, to:

- a) Ensure that data collected by all relevant stakeholders (namely law-enforcement agencies, judicial authorities and health and social services) are disaggregated with regard to the sex and age of the victim and the perpetrator, their relationship, geographical location and the different forms of violence covered by the Istanbul Convention, and that information on the presence of child victims and witnesses is also included;*
- b) Harmonise data collection between law-enforcement agencies and the judiciary, with the aim of, inter alia, allowing the assessment of conviction and attrition rates; enabling a thorough analysis of the pathway of cases through the criminal justice system chain, including through law enforcement, prosecutors' offices and the courts; identifying possible systemic gaps in the institutional and judicial response to violence;*
- c) Improve the existing data-collection models on cases of violence against women that have resulted in the killing of the victim and, where appropriate, children;*
- d) Introduce a data-collection system that allows the recording of the number of breaches of emergency barring, restraining and protection orders, the number of sanctions imposed as a result of such breaches and the number of cases where the woman was revictimised (i.e. subjected to one or more further acts of violence) or murdered as a consequence of such breaches;*
- e) Introduce a data-collection system that allows the recording of the registration and outcomes of asylum claims made on the basis of gender-related persecution;*
- f) Introduce data collection in the healthcare sector in relation to all forms of violence against women;*
- g) Increase awareness among the responsible state agencies as to the requirements of the Istanbul Convention regarding data collection and enhance the skills and capacity of these professionals to collect data;*
- h) Ensure that the process of collecting, storing and transforming collected data complies with standards on personal data protection, as stipulated in the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data.*

(77) GREVIO encourages the authorities of North Macedonia to conduct population-based surveys addressing all forms of violence against women covered by the scope of the Istanbul Convention, as well as to pay particular attention to the prevalence of these forms of violence among groups of women who are subject to or at risk of intersectional discrimination.

Assessment

Monitoring by the Network indicates that, although an intersectional approach is formally recognised, it is not consistently applied in practice. Women living in rural areas, women with disabilities, Roma women, LBT women and women without regulated legal status continue to face additional barriers in accessing protection and support services. Territorial differences in the availability of services have also been identified. At the same time, fragmented institutional data make it difficult to determine whether these groups of women receive the same level of protection and experience the same institutional outcomes as other women.

These concerns are also reflected in the work of the Commission for Prevention and Protection against Discrimination (CPPD). In its thematic work on multiple and intersectional discrimination against Roma women, the CPPD called for an analysis of the response of Centres for Social Work when Roma women report domestic violence and recommended measures to address discrimination and gender stereotyping among professionals, including in cases of gender-based and domestic violence. This indicates that monitoring should go beyond the number of women accessing institutions and examine whether discriminatory patterns exist in the institutional response itself.

Significant gaps in national statistics continue to limit such assessment. The 2025 State Audit Office found that an integrated system for recording victims was not operational and that data were not systematically collected from all competent institutions. Gaps remain in healthcare data, while the national survey envisaged by law, which should provide information disaggregated by characteristics including ethnicity, disability and geographical location, had not been conducted. This is particularly relevant in light of GREVIO's recommendation to examine the prevalence and experiences of violence among women exposed to intersectional discrimination. Without such information, inequalities in access to and outcomes of protection may remain statistically invisible.

Fragmented data are also linked to weaknesses in institutional coordination, transparency and accountability. GREVIO had already noted that data collected by Centres for Social Work were not made public, while subsequent monitoring has continued to identify shortcomings in inter-institutional communication and multisectoral co-operation. The State Audit Office further identified delayed assessments, inadequate monitoring of protection measures and failures in institutional follow-up, and found that the required annual evaluation of specialised services and assessment of users' satisfaction were not being conducted. There is currently no comprehensive mechanism linking data on violence against women with complaints and findings of discrimination, institutional failures, corrective measures and their follow-up. As a result, it remains difficult to determine whether institutional shortcomings disproportionately affect particular groups of women and whether discriminatory practices, once identified, lead to effective corrective action and changes in institutional practice.

6. Women facing intersectional discrimination

Fundamental rights, equality and non-discrimination (Article 4)

(27) GREVIO strongly encourages the authorities of North Macedonia to:

- a) take measures to ensure that the provisions of the Istanbul Convention are implemented without discrimination on any of the grounds listed in Article 4, paragraph 3, particularly when it comes to ensuring access to specialist support services;*
- b) integrate the perspective of women who are or might be exposed to intersectional discrimination, including women with disabilities, women belonging to minority groups, migrant and asylum-seeking women, Roma women, LGBTI women, homeless women, elderly women, women in rural areas, women in prostitution, women in detention and women with addiction issues, into the design, implementation, monitoring and evaluation of policies for preventing and combating violence against women, by supporting, funding and closely co-operating with women's NGOs representing them;*

- c) *Raise the awareness of victims belonging to these groups of women about their rights to protection and support services*

Assessment

Women exposed to gender-based violence do not experience violence, discrimination and barriers to protection in the same way. Roma women, women with disabilities, women living in rural areas, lesbian, bisexual and trans women, migrant women, women who use drugs and sex workers may face intersecting forms of discrimination linked to sex and gender together with ethnicity, disability, sexual orientation, gender identity, socio-economic status, place of residence or other personal circumstances. These factors may increase exposure to violence while simultaneously creating additional barriers to reporting violence, accessing institutions and obtaining effective protection and specialised support.

These concerns remain relevant to the implementation of the Istanbul Convention in North Macedonia. Although the legal and policy framework contains guarantees of equality and non-discrimination, the experience of civil-society organisations indicates that formal equality does not necessarily translate into equal access to rights and protection for women belonging to marginalised communities.

Rural women and women individual farmers

The situation of women individual farmers provides a particularly clear example of how gender intersects with socio-economic status and rural residence to produce structural inequality.

Women registered as individual farmers have for years faced unequal access to rights arising from health insurance, particularly paid leave during pregnancy, childbirth and maternity and compensation during temporary incapacity for work due to illness or injury. Although they participate in the compulsory health-insurance system, the legislative framework excluded them from financial benefits available to other categories of insured persons.

The Commission for Prevention and Protection against Discrimination had already found indirect, continuing and intersectional discrimination in this area. Temporary financial-support programmes introduced from 2023 did not resolve the structural problem. According to information presented in the subsequent public-interest proceedings, only two out of ten applications for support over a two-year period were approved, illustrating the limitations of relying on temporary programmes instead of guaranteeing the right through legislation.

In July 2025, the Helsinki Committee for Human Rights and the Commission for Prevention and Protection against Discrimination initiated an *actio popularis* against the Government and the Ministry of Health, seeking recognition of systemic and continuing discrimination against women individual farmers and amendments to the Health Insurance Law. The action argued that the exclusion constituted intersectional discrimination based on sex, gender, personal status and belonging to a marginalised group.

In May 2026, the Basic Civil Court found indirect, continuing and intersectional discrimination against women individual farmers in access to health-insurance rights. The judgment required the Government and the Ministry of Health to initiate amendments to the Health Insurance Law. Importantly, the court recognised the problem as systemic and arising from the legislative framework rather than from isolated individual cases.

The case demonstrates the importance of examining women's vulnerability to violence within their broader socio-economic circumstances. Economic insecurity and unequal access to social-protection rights can affect women's ability to leave abusive relationships, live independently and recover from violence. Measures addressing violence against women should therefore take account of structural economic inequalities affecting rural women rather than treating rural residence simply as a question of geographical accessibility.

Roma women and other women facing multiple discrimination

Roma women continue to require particular attention because gender discrimination may intersect with ethnicity, poverty, social exclusion and unequal access to public services. These intersecting disadvantages may affect both exposure to violence and the ability to access protection, health care, social services, legal assistance and justice.

An intersectional approach requires institutions to examine not merely whether services formally exist, but whether women belonging to marginalized communities can actually access them in practice. This includes considering geographical distance, transportation, financial circumstances, documentation, accessibility of information, discriminatory attitudes and trust in institutions.

The same principle applies to women with disabilities, migrant women, women who use drugs and sex workers. Protection mechanisms designed around the circumstances of women who face fewer barriers may be formally available while remaining practically inaccessible to women whose circumstances require additional or adapted forms of support. The state response should therefore systematically identify and remove barriers affecting different groups of women and ensure that specialised services are accessible without discrimination.

LBT women, hate speech and hate-motivated violence

Lesbian, bisexual and trans women face an additional intersection between gender-based discrimination and discrimination based on sexual orientation and gender identity. This should be understood not as an issue separate from violence against women, but as part of ensuring that the protections of the Istanbul Convention are available without discrimination. For LBT women, misogyny, homophobia and transphobia may overlap, and violence or hostility directed against them cannot always be adequately understood by assigning it exclusively to either gender or sexual orientation and gender identity.

Monitoring undertaken by the Helsinki Committee between 2023 and 2025 demonstrates the continuing significance of hate speech affecting LGBTI persons and other marginalised communities. During this period, 2,969 cases of hate speech were documented through the monitoring mechanism, alongside continuing concerns regarding the institutional response, particularly limited prosecutorial action.

Monitoring also identified anti-LGBTI hate speech as particularly prevalent in connection with Pride events and increasingly concentrated on social media. The Helsinki Committee's monitoring and advocacy during this period addressed hate speech based on sexual orientation and gender identity, sexist hate speech and anti-gender narratives.

This pattern has continued in 2026. Although the scope of monitoring was reduced during the year because of the lack of financial resources for engaging external monitors, approximately 15% of all reported hate-speech cases monitored by the Helsinki Committee concerned sexual orientation and gender identity. The largest concentration of such cases was recorded in June, following the announcement of the Pride Parade. The reduced monitoring capacity should be taken into account when interpreting these figures, as the number of recorded cases cannot be considered a complete representation of the prevalence of such speech during the year.

On the basis of the 2026 monitoring, the Helsinki Committee identified 21 cases for reporting to the Sector for Computer Crime in relation to the criminal offence of spreading racist and xenophobic material through a computer system. In addition, three cases assessed as particularly serious are being pursued through criminal complaints before the Public Prosecutor's Office because of content considered to disseminate false information and spread or incite hatred. These cases demonstrate that online hate speech remains an important component of the hostile environment faced by LGBTI persons and that certain cases reach a level which, in the assessment of civil-society monitors, warrants a criminal-law response.

Effective institutional responses are particularly important because online hostility does not exist separately from discrimination and violence experienced by LBT women in everyday life. A case documented by the Helsinki Committee involving a transgender woman illustrates how intersecting discrimination based on sex, gender and gender identity can manifest in access to public services and may escalate into alleged physical violence.

The case concerns a transgender woman who reported a series of incidents involving the same bus driver and transport company between July and November 2025. According to the criminal complaint subsequently prepared by the Helsinki Committee together with the victim, the first incident occurred on 24 July 2025, when the driver required her to move from her assigned seat and made remarks towards her. On 4 November 2025, when she attempted to board a bus operating between Skopje and Tetovo, the same driver allegedly told her that she was not allowed to travel on the bus, attempted to force her to leave and used physical force, including twisting her right arm and pushing her towards the exit. The victim called the emergency number 112 and subsequently reported the incident to the police.

A further incident was reported on 13 November 2025, when the same driver allegedly refused to sell her a ticket and again told her that she was not permitted to travel with the company. According to the complaint, the driver indicated that he had been instructed that she was not allowed to travel with them. The victim recorded part of this incident. She associated the repeated treatment with her gender identity, as a transgender woman whose gender is legally recognised in her identification documents.

The case did not remain limited to allegations made by the victim. On 11 March 2026, the Commission for Prevention and Protection against Discrimination found direct discrimination against the woman on the grounds of sex, gender and gender identity in the area of access to goods and services, committed by the transport company and the driver. The Helsinki Committee and the victim subsequently pursued a criminal-law response, alleging that the repeated conduct and the physical assault should also be examined as hate-motivated conduct.

The case is particularly relevant from an intersectional perspective. The alleged conduct cannot adequately be assessed only as discrimination based on gender identity, nor can the alleged physical violence be separated from the discriminatory context in which it occurred. The victim's status as a transgender woman and the alleged repeated denial of access to a public transport service, discriminatory treatment and physical violence demonstrate why institutions need to be capable of identifying multiple and intersecting bias motivations when assessing violence against women.

The case also illustrates the importance of distinguishing between the different protection mechanisms available to victims. A finding of discrimination by the Commission provides recognition and protection within the anti-discrimination framework, but where discriminatory conduct is accompanied by physical violence, threats or conduct potentially motivated by hatred, an effective criminal-law response may also be required. Protection against intersectional discrimination should therefore extend across anti-discrimination bodies, police and prosecution services rather than depend on a victim pursuing separate and disconnected institutional procedures.

More broadly, civil-society monitoring continues to identify shortcomings in institutional responses to hate speech and hate-motivated conduct. While monitoring, reporting mechanisms and institutional training have developed, limited prosecutorial action remains a concern. This is particularly relevant for LBT women because failure to recognise the intersection between gender-based hostility, homophobia and transphobia can result in only one aspect of an incident being recorded or investigated, leaving its broader discriminatory and gendered context unaddressed.

The continued prevalence of hate speech based on sexual orientation and gender identity, its concentration around highly visible LGBTI events such as Pride, and documented cases in which discriminatory treatment allegedly escalated into physical violence demonstrate the need for an institutional response that recognises the continuum between discriminatory discourse, harassment and violence. This does not mean that every instance of hate speech results in physical violence, but it requires institutions to recognise the broader environment in which LBT women experience discrimination and violence.

In line with GREVIO's recommendation on intersectional discrimination, the authorities should ensure that LBT women have effective and non-discriminatory access to protection and support under the Istanbul Convention. Police, prosecutors, social services and other relevant professionals should be equipped to identify and record multiple and intersecting bias motivations, including where hostility based on sex or gender overlaps with sexual orientation or gender identity. Institutional responses should also ensure effective investigation of hate-motivated violence and serious forms of hate speech and strengthen coordination between criminal-justice institutions, equality bodies and specialised civil-society organisations supporting LBT women.

Anti-gender mobilisation and regression in gender equality and education

Developments since GREVIO's baseline evaluation should be considered against a broader environment in which organised opposition to gender equality, sexual and reproductive rights and LGBTI rights has increasingly influenced public discourse, legislative processes and education policy in North Macedonia. This environment is relevant to the implementation of the Istanbul Convention because prevention of violence against women depends not only on criminalisation and protection services, but also on addressing gender inequality, discriminatory stereotypes and social attitudes that sustain violence against women.

Civil-society monitoring has documented the growing influence of anti-gender movements and their use of misinformation, manipulative narratives and public mobilisation against reforms concerning gender equality, comprehensive sexuality education and LGBTI rights. Anti-gender actors have included organised groups and associations, as well as religious and political actors, and their mobilisation has increasingly moved beyond public discourse to affect legislative and policy processes.

One of the most significant examples concerns the proposed Law on Gender Equality. The process of adopting the new law became the subject of sustained anti-gender mobilisation, including campaigns opposing the concepts of gender and gender identity. In June 2023, the Macedonian Orthodox Church organised public protests against the proposed Law on Gender Equality, with support from the Serbian Orthodox Church. Civil-society monitoring identified religious leaders, anti-gender organisations and political actors as prominent participants in the opposition to the proposed legislation.

The impact of these campaigns was also recognised beyond civil society. The European Commission's reporting on North Macedonia identified anti-gender campaigns, at times involving local government officials, religious and political leaders, in connection with the delay in adopting important gender-equality reforms. The proposed Law on Gender Equality ultimately did not proceed to adoption. From the perspective of civil society, this represents one of the clearest examples of anti-gender mobilisation influencing the development of the country's gender-equality framework.

The opposition to the Law on Gender Equality was not an isolated development. Anti-gender organisations also mobilised against comprehensive sexuality education, reproductive rights and reforms recognising gender identity. Civil-society monitoring had already identified adverse

campaigns against the introduction of Comprehensive Sexuality Education, delays in the development of its formal implementation, delays concerning secondary-education reform, the withdrawal of the proposed Civil Registry Law from the parliamentary agenda and the obstruction of the process for adopting the proposed Law on Gender Equality. At the local level, similar developments were reflected in decisions by some municipalities to replace the terminology of “gender equality” with “equality between men and women” in official documents.

This trajectory continued through subsequent changes to the education framework.

During 2025, amendments to the Law on Primary Education reduced some of the explicit anti-discrimination safeguards previously contained in the legislation. Most notably, gender, sexual orientation and gender identity were removed from the explicit list of protected grounds against discrimination in Article 5. Certain references to the Law on Prevention and Protection against Discrimination were also replaced by more general references to the Constitution. The Network for Protection against Discrimination challenged these changes before the Constitutional Court, arguing that they reduced the previously achieved standard of protection and created inconsistencies within the country's anti-discrimination framework.

The changes extended beyond the enumeration of protected grounds. Provisions concerning education and information on gender equality and sexual and reproductive health were also affected. This is particularly relevant from the perspective of the Istanbul Convention because education has an important preventive function in challenging gender stereotypes, promoting equality and enabling children and young people to recognise violence, abuse and unequal relationships.

A parallel regression occurred in the legislative framework governing textbooks in primary and secondary education. In April 2025, the provision prohibiting discriminatory content in textbooks was amended so that, instead of referring to all grounds protected under the Law on Prevention and Protection against Discrimination, it now refers to grounds provided for in the Constitution.

The distinction is substantive. The Law on Prevention and Protection against Discrimination expressly includes, among other grounds, sex, gender, sexual orientation, gender identity, disability, health status and membership of a marginalised group, whereas the Constitution contains a considerably narrower explicit list. The current implementation of the amended framework can also be seen in the Ministry of Education's 2026 textbook competition, which states that textbooks may not promote discrimination on grounds provided for in the Constitution.

In October 2025, the Network for Protection against Discrimination submitted a constitutional initiative challenging the textbook amendment. The initiative argues that the amendment creates different levels of anti-discrimination protection within the domestic legal system and may leave groups expressly protected under the general anti-discrimination legislation without equally explicit protection against discriminatory textbook content.

The consequences are particularly relevant for groups protected on grounds that are expressly recognised in the anti-discrimination legislation but not explicitly enumerated in the Constitution. These include gender, gender identity, sexual orientation and disability. The constitutional initiative specifically points to existing domestic cases in which discrimination had been

established on grounds including gender, gender identity, sexual orientation and disability, demonstrating that these are not merely theoretical grounds of protection.

The trajectory culminated most recently in 2026 with the withdrawal of Comprehensive Sexuality Education as an elective subject from secondary education. The withdrawal followed renewed public controversy surrounding the curriculum, including opposition from the Macedonian Orthodox Church. This development is particularly significant because opposition to Comprehensive Sexuality Education was already documented several years earlier as one of the central objectives of organised anti-gender mobilisation. Civil-society monitoring had identified organisations opposing sexuality education, abortion and reproductive rights and documented their influence on the introduction of Comprehensive Sexuality Education and the strategy for incorporating it into formal education.

Taken together, these developments demonstrate a continuing pattern rather than a series of unrelated policy decisions. Anti-gender mobilisation initially contributed to sustained opposition to the proposed Law on Gender Equality and other reforms concerning gender and gender identity. This was followed by legislative changes in education that removed explicit references to gender, sexual orientation and gender identity from certain protections, narrowed the anti-discrimination standard applicable to textbooks and removed or weakened provisions relating to gender equality and sexual and reproductive health. The subsequent withdrawal of Comprehensive Sexuality Education from the secondary-school curriculum further reduces the space within formal education for addressing issues closely connected to equality, bodily autonomy, healthy relationships and prevention of violence.

This pattern is particularly relevant to Article 14 of the Istanbul Convention. Prevention of violence against women requires states to address the attitudes, stereotypes and inequalities that contribute to gender-based violence. Education has a central role in this respect, including through age-appropriate teaching concerning equality between women and men, non-stereotyped gender roles, mutual respect, non-violent conflict resolution, gender-based violence against women and the right to personal integrity.

The developments are also relevant to GREVIO's recommendation concerning women exposed to intersectional discrimination. Their effects are unlikely to be experienced equally across the population. Girls and young women who are lesbian, bisexual or trans, Roma girls and girls with disabilities may experience discrimination simultaneously on several grounds. Removing explicit recognition of gender, sexual orientation, gender identity or other protected characteristics from sectoral legislation may therefore have particular consequences for groups whose experiences are already insufficiently recognised by institutions.

The broader environment surrounding these reforms is also relevant. Civil-society monitoring has documented increasing anti-LGBTI rhetoric and negative stereotypes, including rhetoric involving political and religious actors. In 2023 alone, the Helsinki Committee's monitoring recorded 805 cases of hate speech between January and September, of which 256 concerned sexual orientation and/or gender identity. At the same time, civil society identified a significant gap between the prevalence of such speech and the institutional response to it. This concern remains relevant in 2026, when the Helsinki Committee's reduced monitoring nevertheless found that

approximately 15% of reported hate-speech cases concerned sexual orientation and gender identity.

These developments should not be interpreted as meaning that every public disagreement with gender-equality policy constitutes hate speech or that every legislative amendment is itself an act of discrimination. Rather, from the perspective of Istanbul Convention implementation, the concern is the cumulative direction of change: organised opposition to gender-equality concepts has coincided with the failure to adopt the proposed Gender Equality Law, changes reducing explicit protection of gender, sexual orientation and gender identity in education legislation, narrowing of anti-discrimination references in textbook legislation, and the withdrawal of Comprehensive Sexuality Education.

This creates a tension between developments in domestic policy and the preventive objectives of the Istanbul Convention. The Convention requires not only a response to violence after it occurs but sustained measures addressing stereotypes, discrimination and gender inequality. Where gender equality and related concepts are progressively removed from legislation, policies and education, the institutional capacity to address the structural causes of violence against women may consequently be weakened.

From an intersectional perspective, it is therefore important that future legislative and policy reforms preserve explicit protection against discrimination based on sex, gender, sexual orientation, gender identity, disability and other relevant grounds, and that education policy retains a clear preventive focus on equality, non-discrimination, healthy relationships, personal integrity and prevention of gender-based violence. The authorities should also ensure that legislative and policy decisions affecting these areas are based on human-rights standards and evidence and are developed through meaningful consultation with women's rights organisations, LGBTI organisations and organisations representing other groups of women exposed to intersectional discrimination.