



## ABOUT US:

The A11 Initiative is a non-profit, non-partisan and non-governmental organization which deals with the promotion, improvement and protection of the rights of individuals from vulnerable, marginalized and discriminated groups, with a particular focus on economic and social rights.

The goals of the Initiative are achieved through activities such as:

- *Monitoring of the implementation of public policies, national and international regulations and recommendations of Treaty Bodies and other international bodies;*
- *Public advocacy for the advancement and full implementation of regulations through which fundamental human rights are protected;*
- *Documenting and reporting cases of human rights violations;*
- *Provision of legal aid and strategic litigation in human rights violation cases;*

- *Implementation of campaigns and educational programs aimed at raising awareness about human rights;*
- *Grassroots activism.*

In its work, the organization is guided by principles such as equality, dignity, solidarity, social justice, inclusiveness and gender equality. Our current focus is on issues related to the realization of economic and social rights of internally displaced persons and of the Roma population, with a special focus on the right to adequate housing and the right to social protection. The A11 Initiative also deals with the issue of economic empowerment of residents of informal settlements.

## TOPICS FOR THE PERIOD MAY - AUGUST 2018

*Projects that we are currently implementing*

*A 11 and FemPlatz Cooperation on UN Reporting*

*Practicum for economic and social rights completed*

*Forced evictions and the applications of the new Law on Housing and Building Maintenance*

*Far from Right to Dignified life*

*Council for Monitoring of implementation UN Human Rights Mechanisms Rec's*

*The A 11 Initiative and the Platform of Organizations for Cooperation with UN Human Rights Mechanisms*

*Draft Law on Free Legal Aid in contradiction with the Strategy for the Development of the Free Legal Aid System*

*Crowdfunding Academy*

*Holistic Approach to Roma Housing in the Western Balkans Region and Turkey*

*Supreme Court of Cassation Refuses to improve protection of citizens*

### **Article 11, paragraph 1 of the International Covenant on Economic, Social and Cultural Rights**

**"The States Parties to the present Covenant recognize the right of everyone to an adequate standard of living for himself and his family, including adequate food, clothing and housing, and to the continuous improvement of living conditions. The States Parties will take appropriate steps to ensure the realization of this right, recognizing to this effect the essential importance of international co-operation based on free consent."**

## PROJECTS THAT WE ARE CURRENTLY IMPLEMENTING

### Improved local integration of IDPs through enhanced access to social rights



**Donor:** United Nations High Commissioner for  
Refugees

**Project duration:** January 2018 – December 2018

The goal of the project that we are implementing with the support of the United Nations High Commissioner for Refugees is to contribute to the local integration of the most vulnerable internally displaced persons by strengthening the protection of their human rights, namely their right to adequate housing and social protection.

The project is divided into five clusters:

- 1) *protection of rights, provision of information and representation of at least 650 internally displaced persons in front of administrative bodies and courts in the Republic of Serbia;*
- 2) *advocating for the improvement of the legal framework and public policies related to economic and social rights of internally displaced persons;*
- 3) *presenting the problems internally displaced persons face when attempting to realize their economic and social rights via implementing a public campaign on their rights;*
- 4) *empowering local communities to seek better realization of their economic and social rights;*
- 5) *development of a proposal for the improvement of the realization of economic and social rights of internally displaced persons in Serbia;*

### Listen, learn, act – collaborative for Roma empowerment



**Donor:** The Olof Palme International Center

**Project duration:** January 2016 – December 2019

The goal of the project that we have been implementing through the four-year-long support of the “Olof Palme” International Center is to empower the Roma community and enable individuals from said community to realize their economic and social rights, particularly the right to work. Through the first two years of project implementation, projects and policies related to economic empowerment of Roma in Serbia have been mapped, and two models for economic empowerment of Roma have been tested – the improvement of the process of secondary raw material gathering for those that gather them, and support for Roma women that finished informal vocational programs so that they could implement their own money-earning activities.

The following activities have been envisioned for the third year of project implementation:

- 1) *support to local Roma communities aimed at initiating initiatives for economic empowerment;*
- 2) *preparation of a manual for implementing local initiatives aimed at the promotion of rights or economic empowerment of Roma and other marginalized groups and communities;*
- 3) *presenting problems with which Roma living in informal settlements are faced in regard to the realization of the right to work – implementation of a public campaign on their rights;*
- 4) *monitoring laws, public policies and practices relevant to the integration of Roma and their position in the labor market (focus topics: forced labor of financial social assistance beneficiaries, criminalization of secondary raw materials collection, implementation of the Strategy for Social Inclusion of Roma in the Republic of Serbia and the Action Plan concerned with its implementation);*
- 5) *situational testing of discrimination of Roma in the labor market.*



## THE PRACTICUM FOR ECONOMIC AND SOCIAL RIGHTS COMPLETED

The A11 Initiative for Economic and Social Rights held a Practicum for Economic and Social Rights at the Faculty of Law of the University of Union from 21 March to 28 May 2018.

In that period of time eight lectures covering various topics in the field of economic and social rights were held, such as: the history and development of human rights, the International Covenant on Economic, Social and Cultural Rights, the interconnectedness of civil and political and economic and social rights, the right to social...

...protection and the social protection system in Serbia, examples of successful fights for the realization of economic and social rights, domestic and international mechanisms for the protection of economic and social rights, the role of NGOs in the protection of economic and social rights.

The participants that successfully completed the course stated in the course evaluation sheets that they would be interested to work in the field of economic and social rights in some capacity in the foreseeable future.



## A 11 PARTICIPATED AT THE REGIONAL CONFERENCE "HOLISTIC APPROACH TO ROMA HOUSING IN THE WESTERN BALKANS REGION AND TURKEY"

The Regional Council for Cooperation organized a conference focused on a holistic approach to Roma housing in the pre-EU accession region on 31 May and 1 June in Bar, Montenegro.

At a time when UNDP and World Bank research indicates that a large number of Roma households do not have access to potable water, sewage and organized waste disposal, as well as to affordable housing, the conference aimed to find innovative solutions to problems the Roma face in realizing their right to adequate housing via interactive discussion. Another aim was to map current efforts dedicated towards solving this problem that affects the most vulnerable Roma individuals in the Western Balkans Region and in Turkey.

A comparative analysis of legislation related to legalization and social housing in the aforementioned regions was presented at the conference, as were examples of projects implemented in the...

...countries of the region that dealt with the right to adequate housing from a perspective of inclusive integration of Roma individuals.

Over 80 representatives of competent state authorities, international and non-governmental organizations that deal with the subject of Roma housing gathered for the occasion, while the A 11 Initiative Programme Director DaniĀo Ćurĉić moderated a panel on social housing for Roma and the ways in which the current situation in that field could be improved.

The conference report, materials and panelist presentations can be found at the Regional Cooperation Council website.

## CROWDFUNDING ACADEMY

The A 11 Initiative team successfully completed the Crowdfunding Academy organized by GIZ (Deutsche Gesellschaft für Internationale Zusammenarbeit) and Brodoto. For more information regarding the Crowdfunding Academy, visit the following link. You can also find videos from the Academy itself at the following link.



## THE A 11 INITIATIVE BECAME A MEMBER ORGANIZATION OF THE PLATFORM OF ORGANIZATIONS FOR COOPERATION WITH UNITED NATIONS HUMAN RIGHTS MECHANISMS

On 4 July 2018 the inaugural meeting of the Platform of Organizations for Cooperation with United Nations Human Rights Mechanisms was held at the Human Rights House in Belgrade. On that occasion the A 11 Initiative signed the founding document and became one of the 15 founding members of the Platform - which is coordinated by the Belgrade Centre for Human Rights.

The goal of the Platform is to ensure a unified and standardized approach to thematic, timely and quality reporting to the United Nations Human Rights Mechanisms, and one of the main activities that will be taken to that end is reporting on the implementation of UN human rights mechanisms' recommendations to Serbia. Other activities will include presenting results of research on the implementation of the aforementioned mechanisms' recommendations, provision of expert and evidence based assessments and documents on the improvement in order to affect the implementation of recommendations and policy-making (road maps, reports on the realization of recommendations, creating indicators in cooperation with representatives of ministries and other entities), as well as presenting indicators on the degree of success in the implementations of UN human rights mechanisms' recommendations and international human rights protection standards.

The Platform will implement its first activity in late September of 2018, and it will comprise of a conference on the Universal Periodic Review and the recommendations given to the Republic of Serbia through that process.



### THE A 11 INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS SIGNS MEMORANDUM ON COOPERATION WITH THE COUNCIL FOR MONITORING OF THE IMPLEMENTATION OF UNITED NATIONS HUMAN RIGHTS MECHANISMS' RECOMMENDATIONS

The Council for Monitoring of the Implementation of United Nations Human Rights Mechanisms' Recommendations is a Government body that was constituted in March of 2015 with the mandate to contribute to the protection of human rights and the rule of law in Serbia through monitoring of the implementation of the United Nations human rights mechanisms' recommendations. The Council's work revolves around reporting to and communicating with the United Nations human rights mechanisms.

Although the Council is a government body, it involves a substantial number of NGOs in its work. The A 11 Initiative signed a memorandum on cooperation with the Council on its seventh session, which was held on 5 July 2018, thereby becoming one of the organizations that will contribute to the Councils' work through providing information on the implementation of recommendations concerning the realization of economic and social rights, as well as of minority rights and rights of marginalized groups.



## FEMPLATZ AND THE A 11 INITIATIVE SUBMITTED A JOINT REPORT TO THE COMMITTEE ON THE ELIMINATION OF DISCRIMINATION AGAINST WOMEN

Association of Citizens FemPlatz and the A 11 Initiative continued their cooperation in regard to reporting to UN-human rights mechanisms. In June 2018 they submitted a joint report to the Committee on Elimination of Discrimination against Women in light of the Working Group meeting that is supposed to result in a list of questions related to the implementation of the Convention on the Elimination of Discrimination against Women in the Republic of Serbia.

As in the previous submission to UN human rights mechanisms, the focus of the report was on the discrimination of women and the position of women coming from marginalized groups and vulnerable categories of the population in the Republic of Serbia.

The report especially points out the impact of austerity measures on the realization of women's human rights, stereotyping, and patriarchal comments high representatives of the Government made about women, as well as the inequality of handicapped women deprived of working ability in front of the law, which leads to forced abortions, failure to provide information to women regarding contraceptive protection that is imposed upon them, forced sterilization, separation from children and other forms of forcible treatment that lead to inhuman and degrading treatment.

Furthermore, the report stresses the insufficient participation of women belonging to marginalized groups in the creation, implementation and evaluation of public policies, as well as insufficient participation in the public and political life in Serbia.

Finally, the report also points to problems women without documents have in accessing health care and free prenatal and maternal care in health care institutions in the Republic of Serbia.

The report can be downloaded via the website of the Office of the High Commissioner for Human Rights.

## THE A 11 INITIATIVE AND FEMPLATZ SUBMITTED A REPORT TO THE INDEPENDENT EXPERT FOR FOREIGN DEBT AND HUMAN RIGHTS OF THE UN

As part of the regular consultation process that the UN special procedures mandate holders have with the civil sector, the A 11 Initiative for Economic and Social Rights (hereinafter: A 11 Initiative), in cooperation with the Association of Women FemPlatz (hereinafter: FemPlatz), submitted a report to the Independent Expert on the effects of foreign debt and other related international financial obligations of States on the full enjoyment of all human rights, particularly economic, social and cultural rights. The key findings of the report outline the disproportionately negative effect of economic reform policies of the Republic of Serbia on the realization of women's human rights.

In the report, FemPlatz and the A 11 Initiative illustrated the impact of various measures taken by the Republic of Serbia, such as those introduced in 2012 aimed at consolidating public finances and reducing the budget deficit, on socially marginalized groups of people such as financial social benefit users, Roma, the homeless, women, especially women belonging to one or more of the aforementioned categories.

The report also focuses on the lack of ex-ante gender based evaluations of the impact of implemented measures on the realization of women's human rights, as well as on the fact that laws, policies and programs are being adopted without consid-

eration of their impact on women in Serbia, especially those from multiply marginalized and discriminated groups. Furthermore, the report warns about the lack of dialogue and transparency during the adoption of reform policies and the yearly budget.



The A 11 Initiative will continue to follow the Republic of Serbia on its path towards the realization of equality among sexes, via monitoring and evaluation of measures and policies taken by the Republic of Serbia related to economic and social rights.

The full report can be downloaded by clicking the following link.



## **THE REPUBLIC OF SERBIA REJECTED THE RECOMMENDATION TO IMPROVE THE PROTECTION OF ECONOMIC AND SOCIAL RIGHTS AT THE UN HUMAN RIGHTS COUNCIL SESSION**

At the last UN Human Rights Council session, at which the Republic of Serbia went through the third cycle of the Universal Periodic Review, the Serbian delegation rejected the recommendation to sign and ratify the Optional protocol to the International Covenant on Economic, Social and Cultural Rights.

This Optional Protocol makes it possible for individuals who consider themselves to be victims of economic and social rights violations to, upon exhausting all domestic legal remedies, seek protection from the Committee for Economic, Social and Cultural Rights. The Protocol is an instrumental tool for the protection of economic, social and cultural rights throughout the world and as of today 45 United Nations member states have signed the Protocol while 23 have ratified it.

The application of the Protocol began in May of 2013, and in its practice to date the Committee has provided protection to women in cases concerning the unlawful abolition of pensions as well as in eviction cases that resulted in the violation of the right to adequate housing.

Independent state institutions for the protection of human rights have for years been reporting an increase in the number of economic and social rights related appeals submitted by citizens.

Apart from that, the Constitutional Court of Serbia has not shown to date that it adequately protects economic and social rights. The rejection of the initiative for the assessment of the constitutionality of the Law on the Provisional Regulation of Pension Payment Methods, unjustifiably protracted procedures for assessing the constitutionality of the provisions of the laws introducing the taxation of social housing, refugees and internally displaced persons and the Decree on Measures of Social Inclusion of Financial Social Assistance Users all illustrate this.

By rejecting this recommendation, the Republic of Serbia missed out on an opportunity to improve access to justice to victims of economic and social rights violations as well as to, through dialogue with the Committee clarify its obligations in regard to the realization of economic and social rights, which will have a particularly negative effect on the most vulnerable categories of the population.





## THE SUPREME COURT OF CASSATION REFUSES TO IMPROVE THE PROTECTION OF CITIZENS FROM INEFFICIENT TREATMENT BY ADMINISTRATION

The Department for the Protection of the Right to Trial within a Reasonable Time of the Supreme Court of Cassation refused to use its authority to recommend the initiation of an initiative for the amendment of regulations that would contribute to the protection of citizens from protracted proceedings in front of administrative bodies. As a reminder we would like to point out that the A11 Initiative submitted an appeal to the Department for the Protection of the Right to Trial within a Reasonable Time in March of 2018, in order to recommend amendments to the Law on the Protection of the Right to Trial within a Reasonable Time. The suggested amendments would ensure that parties in administrative procedures are protected from inefficient treatment. Namely, after the Law on the Protection of the Right to Trial within a Reasonable Time came into force, parties in administrative procedures were left without protection from protracted proceedings as the legal remedy envisioned by that law – complaint to expedite the procedure – are only applicable in court procedures.

In their response, the Supreme Court of Cassation stated that “legally prescribed deadlines for the completion of the first and second degree procedures exist in administrative proceedings, as well as legal remedies in case of ‘administrative silence’”. However, the mentioned legal remedies are not sufficient in themselves to protect citizens from inefficient actions of the administration, especially in instances when cases are returned for reconsideration on multiple occasions. Those are remedies that can contribute to the expediency of deliberation in situations where the ruling bodies are inactive in certain phases of the procedure. However, they do not ensure the expediency of entire procedures. This has been established via European Court for Human Rights practice in 2006 when it was pointed out the main reason why the *Božić v Croatia* administrative case was unreasonably protracted was that the it was returned for reconsideration on multiple occasions, and that complaints on administrative silence, or lawsuits in administrative proceedings are not intended for rectifying this inadequacy, nor could they. However, domestic legislation only relies on the aforementioned legal remedies, and the Supreme Court of Cassation ignored the arguments presented in the appeal that pointed out that such remedies do not constitute sufficient protection from ineffective treatment of the administration, as well as that domestic law is not aligned with European Court of Human Rights standards.

The lack of protection of the right to trial within a reasonable time in front of administrative authorities can have serious practical consequences. Practice shows that, due to cases being constantly remitted to lower instances, simple procedures such as those related to the realization of the right to financial social assistance can last longer than five years. In such instances, the only thing that could expedite the ruling is the recognition of the violation of the right to trial within a reasonable time. However, the Law on the Protection of the Right to Trial within a Reasonable Time only protects the rights of parties in court proceedings, but not in proceedings in front of administrative bodies.

Bearing in mind that various rights of existential importance for individuals are being realized in administrative procedures regularly - such as the right to financial social assistance, registration in the birth registry, registration for health insurance – the A11 Initiative will continue to advocate for amendments that would provide an adequate legal remedy ushering a more expedient resolution of these cases.





## FORCED EVICTIONS AND THE APPLICATIONS OF THE NEW LAW ON HOUSING AND BUILDING MAINTENANCE

Some of the main activities of the A 11 Initiative include monitoring the application of domestic and international standards and regulations on the right to housing, as well as provision of free legal aid in cases where this right has been violated. Considering the sorts of dramatic consequences that can result from forced evictions, especially those resulting in homelessness, the A 11 Initiative is especially dedicated to the application and respect for all domestic and international prescribed resettlement procedures so as to ensure that all individuals are provided with an adequate alternative housing solution and the full respect of the right to adequate housing.

### Forced eviction of the informal settlement next to the Vinča landfill

Since May 2018 the A 11 Initiative has been monitoring of the resettlement of the informal Roma settlement located next to the landfill in Vinča. Since then, many irregularities and violations of settlers' human rights have been recorded. Instead of being involved in a consultation process that should take place before any relocation and which involves the possibility for all community members to express alternative solutions and state their needs regarding adequate housing - and in hand directly impact any decision-making, the residents were only involved in instructive sessions wherein they were simply informed of the already made decisions of the city authorities. Besides being only informative,

the Secretariat for Social Protection organized meetings that took place in the settlement provided the residents with scant and incomplete information regarding issues that were of utmost importance to their relocation. The scantiness of information predominantly refers to the information they received regarding the affordability of the social housing model that is to be applied in their case, as well as to the ways in which secondary raw materials collectors who work at the city landfill in Vinča will be ensured a sustainable source of income. Besides that, the dynamics and methods used to document the residents and their households - on the basis of which they "realize their right"

to adequate alternative accommodation - exposed four families to the risk of homelessness as they were not on a list that was made in 2016. The city authorities therefore refuse to provide them with adequate alternative accommodation. As a result of everything here mentioned, the A 11 Initiative outlined complaints on the Draft Decision on the Necessity of Eviction with the Plan of Relocation of Households on the Territory of the Vinča Landfill to the Planning Commission of the City of Belgrade during the public scrutiny period. Furthermore, the A 11 Initiative will continue to provide legal and other forms of support to residents of the informal settlement located at the Vinča landfill in order to protect their right to adequate housing.

### Forced evictions of residents of the Viaduct settlement in Resnik announced

As a result of the work being done on the Belgrade by-pass, the Department for Property and Housing Affairs of the Municipality of Rakovica has in June, at the behest of "Koridori Srbije", began calling and taking statements from residents living in abandoned workers' apartments located in Bulevar patrijarha Pavla 40 in Resnik. There are currently approximately 70 for the most part Roma families living there who due to their social status and degree of vulnerability will not, in case of their eviction, be capable of finding alternative housing. The A 11 Initiative will continue to follow up and report on the relocation process, and continue to provide legal aid to the families affected by the forced eviction process.





## **DRAFT LAW ON FREE LEGAL AID IN CONTRADICTION WITH THE STRATEGY FOR THE DEVELOPMENT OF THE FREE LEGAL AID SYSTEM AND WITH USERS' INTERESTS**

During July and August, the Ministry of Justice opened up a public debate regarding the Draft Law on Free Legal Aid. The citizens of Serbia have been waiting for the adoption of the said law for more than a decade.

Unfortunately the Draft Law does not take into account the best interest of citizen's who are in need of free legal aid. The proposed Draft Law seeks to limit the circle of free legal aid providers and introduce complicated procedures that would limit the number of potential users of free legal aid. The A 11 – Initiative for Economic and Social Rights sent its comments during the public debate in which it pointed out several key deficiencies of the Draft Law and the necessity of its withdrawal from further proceedings.

Namely, the Draft Law on Free Legal Aid diverges from the strategic goals set out in the Strategy for the Development of a Free Legal Aid System, which was intended to help preserve and improve the existing resources in the future free legal aid system, as well as to create conditions for the specialization of free legal aid providers for specific topics. By introducing the limitation which stipulates that only lawyers and free legal aid service centers in local self-government units can provide free legal aid while associations can only provide free legal aid on the basis of the provisions of laws that regulate asylum and discrimination - and then only through lawyers – the Government has made it clear that it will not continue to follow the principle of specialization of providers and is willing to neglect the many-decade-long experience of citizens' associations in regard to the provision of free legal aid to users belonging to the most fragile social groups. Besides, the proposed Draft comprehensively prevents syndicates from providing free legal aid, although they have been granted this right by other regulations of the same legal force.

Besides that, the conditions for providing free legal aid to citizens who are in need of this form of aid have been too narrowly set out, and do not adequately cover all individuals in need of it. Ultimately, the process of realizing the right to free legal aid is not aligned with the needs of the most vulnerable and marginalized citizens who are in dire need of it.

By instating penal provisions and unclear definitions of quality control procedures upon, among others, associations of citizens, the executive branch of government inevitably infringes upon the work autonomy of citizens' associations, while at the same time limiting their scope of activities with regard to the improvement of the realization of human rights in the

rights in the Republic of Serbia by imposing high penalties.

In cooperation with other organizations, the A 11 Initiative for Economic and Social Rights pointed out the problematic provisions of the Draft Law of Free Legal Aid. Having in mind the systemic inadequacies and deficiencies of the Draft Law, the A 11 Initiative appealed to the Ministry of Justice demanding that the said Draft Law be removed from procedure so that certain provisions could be closer aligned with the needs of users of the free legal aid system, as well as with the responsibilities the Republic of Serbia has taken upon itself in regard to the realization of human rights.

### **Article 11, paragraph 2 International Covenant on Economic, Social and Cultural Rights:**

***The States Parties to the present Covenant, recognizing the fundamental right of everyone to be free from hunger, shall take, individually and through international co-operation, the measures, including specific programmes, which are needed:***

***(a) To improve methods of production, conservation and distribution of food by making full use of technical and scientific knowledge, by disseminating knowledge of the principles of nutrition and by developing or reforming agrarian systems in such a way as to achieve the most efficient development and utilization of natural resources;***

***(b) Taking into account the problems of both food-importing and food-exporting countries, to ensure an equitable distribution of world food supplies in relation to need.***



## STILL FAR FROM REALIZING THE RIGHT TO A DIGNIFIED LIFE

It has been almost 20 years since they were forced to leave their homes in Kosovo, and Roma individuals living in the Collective Center in Bujanovac are still facing numerous existential difficulties. The A 11 Initiative team has had the chance to witness that first hand when, together with the representatives of the Office of the United Nations High Commissioner for Refugees, they visited the internally displaced persons accommodated in the Center, a building of the former technical school, during the month of July.

The conditions in the dilapidated building, which the families living therein adapted to be individual housing units although the maintenance of the center is in the jurisdiction of the Commissariat for Refugees and Migration, are far from satisfactory. What's more, it could be said that they do not meet the minimum adequacy, especially in regard to hygienic conditions. It is sufficient to say that there are only two water heaters for the 80 residents of the Collective Center. The recklessness of the competent Commissariat, which is obliged to pay for the communal expenses, led to the Center being disconnected from water and electricity because it failed to pay the bills for the said services. According to the settlement residents, they were without access to water and electricity for three months between October 2017 and January 2018. Besides that, the roof is leaking in many housing units as they are worn out, and they are such primarily due to the fact that the competent authorities do not provide resources for maintenance.

Social protection of the inhabitants of the Collective Center is also at a low level. The unlawful practice of the SWC in Bujanovac whereas the users of the Collective Center are verbally denied the right to financial social assistance under the pretense that they are not entitled to that right because of the fact that they live in the Center and receive a meal in the national kitchen – that meal consisting of one bread per household resident – is particularly worrying. Furthermore, the Center residents had complaints about the very meager and for their needs insufficient amounts provided via one-time financial social aid by the competent SWC.

Furthermore, the actions of the Commissariat for Refugees and Migration that prohibit the subsequent enrollment of household members who are not registered as being internally displaced immediately after displacement, as well as their refusal to enter newborn family members into the register of internally displaced persons prevents these individuals from registering their residence and receiving personal documents. This form of treatment forces them to submit fictitious addresses for their places of temporary and permanent residence in order to acquire personal documents and realize other rights they do not have access to.

