CONTRIBUTIONS TO REPORTS

Written Contribution to the European Commission 2026 Annual Report on Serbia

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Introduction

The A 11 - Initiative for Economic and Social Rights is a non-profit, non-partisan and non-governmental organisation dedicated to the promotion and protection of the rights of individuals from vulnerable, marginalised and discriminated groups, with a particular focus on economic and social rights.

This submission is prepared as a contribution to the European Commission's 2026 Annual Report on Serbia. It is drafted against the backdrop of limited overall progress noted in the latest European Commission assessment, which highlighted persistent structural shortcomings in the areas of rule of law, fundamental rights, and social policy. In particular, concerns remain regarding the effectiveness of institutional safeguards, including the slow functioning of the Constitutional Court, which operates without clear deadlines for decision-making, as well as the continued suspension of the Law on Gender Equality, which creates a prolonged legal vacuum in the area of gender equality.

Recent developments further raise concerns regarding the overall human rights environment. Cases involving discriminatory statements by public officials, including the Commissioner's finding of discrimination against the Minister for Human and Minority Rights and Social Dialogue, Mr. Beriša in relation to his statements targeting Roma communities, illustrate persistent challenges in ensuring accountability and respect for equality standards.[1] At the same time, responses to issues related to the use of coercive means in the context of public assemblies, including allegations concerning the use of acoustic devices for crowd control, have raised serious questions regarding the protection of fundamental rights, including freedom of assembly and protection from ill-treatment.[2]

In this context, this document focuses on the following key issues: effectiveness and independence of independent human rights bodies; labour rights violations and gaps in legal protection; institutional and policy shortcomings in the field of social protection; forced evictions and access to adequate housing for Roma; human rights concerns related to the implementation of the Law on Social Card; and the denial of parental and child allowance to Roma children.

[1] A 11 Initiative, "Utvrđeno: ministar Demo Beriša izjavom o 'bankomatima' prekršio zakon i diskriminisao Rome", https://www.a11initiative.org/utvrdjeno-ministar-za-ljudska-i-manjinska-prava-demo-berisa-izjavom-o-bankomatima-prekrsio-zakon-i-diskriminisao-rome/

[2] European Court of Human Rights interim measure in cases concerning the use of acoustic devices for crowd control in Serbia; see also A 11 Initiative, "Evropski sud za ljudska prava naložio Srbiji da se uzdrži od upotrebe zvučnih uređaja…", https://www.a11initiative.org/evropski-sud-za-ljudska-prava-nalozio-srbiji-da-se-uzdrzi-od-upotrebe-zvucnih-uredjaja-za-kontrolu-okupljenih-gradjana/

Protection of Labour Rights

Labour rights violations remain a persistent concern in Serbia, while the adoption of a new Labour Law has been pending for several years. In the absence of legislative reform, the existing framework is increasingly unable to respond to the realities of a changing labour market, resulting in significant gaps in the protection of workers' rights.

Last year's developments further illustrate these shortcomings. Following wage suspensions linked to elementary and high school teachers' work stoppages, there has been a noticeable increase in cases of non-renewal of employment contracts among teachers. Although no official consolidated data is available, trade unions report at least dozens of such cases, with indications that the actual number is significantly higher. These practices must be understood in the context of the widespread use of temporary and fixed-term contracts in the education sector, which leaves a large number of teachers in a structurally vulnerable position and exposed to undue pressure. The reported cases raise concerns about arbitrary and potentially politically motivated employment decisions, as well as the overall climate for the exercise of labour rights. They also point to shortcomings in the alignment with the EU social *acquis*, particularly in relation to protection against unjustified dismissal and the effective enforcement of workers' rights. At the same time, last year's developments exposed significant weaknesses in the existing Law on Strike, which appears outdated, difficult to apply in practice, and not fully in line with principles enshrined in the European Pillar of Social Rights, notably those concerning secure employment, social dialogue, and the effective exercise of collective labour rights.

At the same time, the situation of pharmacists employed by "Apoteka Beograd", a publicly owned pharmaceutical institution that forms part of the public healthcare system of the City of Belgrade and is mandated to provide accessible pharmaceutical services to the population - highlights the extent to which existing legal protections fail in practice. Unlike private pharmacies, "Apoteka Beograd" operates within the public health framework and performs a function of general interest, which makes the prolonged deprivation of workers' rights within this institution particularly concerning.[3]

Workers have reportedly gone for prolonged periods, up to a year, without receiving salaries, while remaining formally employed and without access to effective legal remedies. This situation places them in a legal and institutional vacuum, where neither labour law mechanisms nor insolvency or enforcement procedures provide timely protection.

[3] For more information, please see: https://www.nin.rs/drustvo/vesti/100053/sindikat-opstanak-zaposleni-u-apoteci-beograd-devet-meseci-bez-plata https://www.masina.rs/drzavne-apoteke-u-srbiji-u-borbi-za-opstanak/

Approximately 90% of the affected workers are women, many of whom are nearing retirement age, further limiting their ability to secure alternative employment.

This case clearly demonstrates how gaps in the legal framework, combined with weak enforcement, can result in severe socio-economic insecurity, even within institutions that are formally part of the public healthcare system and expected to uphold the highest standards of legality and worker protection.

Taken together, these developments point to a broader structural issue: the current labour law framework does not adequately cover a range of employment situations that have become increasingly common, nor does it provide effective protection in cases of employer abuse or institutional failure. As a result, workers in precarious or atypical forms of employment remain particularly prone to violations of their rights.

In this context, it is difficult to speak of sustainable economic development or meaningful reform progress without ensuring the effective protection of basic economic and social rights. While labour law reform has not been treated as a priority, the situation in practice clearly demonstrates that existing safeguards are insufficient. Addressing these challenges requires not only the adoption of new legislation, but also a comprehensive approach that ensures that all categories of workers are covered and that rights are enforceable in practice.

Having that in mind, Serbia should:

→ ensure prioritise the adoption of a new Labour Law that reflects the realities of the contemporary labour market, ensuring comprehensive coverage of all categories of workers, including those in precarious and non-standard forms of employment. The reform should close existing legal gaps, strengthen protection against arbitrary termination and non-renewal of contracts, and guarantee effective and timely remedies in cases of labour rights violations, including non-payment of wages. Particular attention should be given to sectors with a high prevalence of vulnerable workers, as well as to ensuring that labour rights can be exercised without fear of retaliation.

Inadequate institutional capacities and legal and strategic framework in the field of social protection

The social protection system in Serbia continues to face structural challenges in ensuring adequate support to vulnerable individuals, effective social inclusion, and poverty reduction. Persistent gaps in policy design, weak institutional capacities, and the absence of strategic direction continue to limit its overall effectiveness. These challenges have been

further exacerbated by the continued absence of a central coordination mechanism following the dissolution of the Social Inclusion and Poverty Reduction Unit (SIPRU) in 2021. Since then, no equivalent body has been established to ensure evidence-based policymaking and coordinated implementation of social inclusion measures across sectors.

A longstanding issue remains the lack of a comprehensive National Social Protection Strategy. Although the process of drafting a new strategy formally resumed in 2024, developments over the past year raise serious concerns regarding its inclusiveness and transparency. The process has been characterised by limited and inconsistent stakeholder engagement, short and restrictive deadlines, and the exclusion of relevant professional associations from participation. Civil society organisations have reported that their envolment in working group were largely formalistic, with limited opportunities to meaningfully influence the content of the draft Strategy. Such practices are not in line with the requirements of the Law on the Planning System, which provides for participatory and inclusive policymaking processes.[4]

In terms of adequacy, financial social assistance (FSA) remains significantly below the level required to ensure a minimum standard of living. As of 2025, the nominal amount of FSA for a single beneficiary is 12,266 RSD, while the cost of the minimum consumer basket (which is 55,527.62 RSD)[5] continues to substantially exceed the level of support. This already manifestly inadequate amount of financial social assistance is further reduced for able-bodied individuals and families with a majority of able-bodied members due to three-month interruptions in benefit payments[6] and the calculation of so-called missed earnings.[7] This persistent gap highlights the structural inadequacy of the benefit in meeting basic needs. Regular biannual adjustments have proven insufficient to address inflationary pressures and rising living costs. This situation raises concerns regarding alignment with Principle 14 (Minimum Income) of the European Pillar of Social Rights.

The situation is further aggravated by restrictive eligibility rules and reductions in benefit levels. In particular, able-bodied individuals and households with a majority of able-bodied members are subject to temporary, three-months-long suspensions of benefits, as well as deductions based on the concept of “missed earnings”, which are calculated irrespective of actual income. These measures significantly undermine the protective function of social assistance and increase the risk of extreme poverty.

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[4] More details avaliable at: A 11 Initiative, “Ministarstvo za rad nastavlja da simulira dijalog…”, https://www.a11initiative.org/ministarstvo-za-rad-nastavlja-da-simulira-dijalog-rok-za-izradu-nacrta-strategije-socijalne-zastite-svega-mesec-dana/ and A 11 Initiative, “Hronika donošenja Strategije socijalne zaštite…”, https://www.a11initiative.org/hronika-donosenja-strategije-socijalne-zastite-stratesko-ignorisanje-dijaloga/

[5] The latest officially published data from March 2025 show the amount of the minimum consumer basket of 55,527.62, avaliable at: https://must.gov.rs/extfile/sr/14052/Korpa%20mart%202025%20za%20sajt%20MUST.pdf

6 Article 85, para. 3 of the Law on Social Protection

7 Article 102 of the Law on Social Protection and he Rulebook on Forms Required for Obtaining Financial Social Assistance ("Official Gazette of RS", No. 90/2024)

Despite the urgent need for reform, amendments to the Law on Social Protection, announced nearly a decade ago, have still not been adopted. This continued delay persists despite repeated calls from relevant institutions, including the Commissioner for the Protection of Equality and the European Commission.[8]

To improve the protection of vulnerable populations from destitution and facilitate their social inclusion, Serbia should:

→improve the coverage and adequacy of financial social assistance (FSA) and abandon additional reductions to its already insufficient amount, specifically by discontinuing benefit interruptions and deductions based on fictitious "missed earnings".

Human rights issues raised by the implementation of the Law on Social Card and its impact on vulnerable groups

The introduction and implementation of the Social Card Registry remains one of the most significant developments in Serbia's social protection framework, with far-reaching implications for the enjoyment of socio-economic rights. As already noted in previous contributions to the European Commission's Progress Report on Serbia, concerns persist regarding its impact on Roma and other vulnerable groups, particularly in light of the system's reliance on semi-automated data processing without adequate safeguards.[9]

Since the entry into force of the Law on Social Card in March 2022, the number of beneficiaries of financial social assistance has decreased by nearly one third, with approximately 60,000 individuals losing access to benefits.[10] This reduction has not been accompanied by corresponding improvements in poverty indicators, raising serious concerns that exclusions are driven not by improved socio-economic conditions, but by systemic deficiencies in the functioning of the Social Card system.

At the core of the problem is the increasing reliance on semi-automated decision-making processes, which operate without sufficient human oversight or procedural safeguards. In practice, decisions to reduce or terminate benefits are frequently based on inaccurate, outdated, or incomplete data contained in the Social Card Registry. Beneficiaries are often not given the opportunity to participate meaningfully in the procedure, including the right

[8] The Commissioner for the Protection of Equality, Initiative for Amendments to the Law on Social Protection, No. 011-00-382/2024-02 of 31 October 2024, available at: https://ravnopravnost.gov.rs/rs/894-2024-inicijativa-za-izmene-i-dopune-zakona-o-socijalnoj-zastiti/

[9] European Commission, Serbia 2024 Report, 2024, p. 79. and European Commission, Serbia 2025 Report, 2025, p. 84

[10] Data received based on the FoI request from the Ministry of Labour, Employment, Veteran and Social Affairs, Act. No 000273947 2025 13400 009 001 041 001, dated 13 February 2025.

to be heard and to explain their individual circumstances prior to a decision being made. This is in contradiction with the Law on General Administrative Procedure and undermines the right to a fair procedure.

The consequences of such decisions are severe. Individuals who lose access to financial social assistance are often left without any form of income for extended periods, as appeal procedures can take several months. During this time, they may also lose access to healthcare coverage, soup kitchens and face heightened risks to housing security. In this way, deficiencies in the system directly impact a range of fundamental rights, including the right to social security under Article 9 of the International Covenant on Economic, Social and Cultural Rights. Particularly concerning is the disproportionate impact of the system on Roma communities and individuals engaged in informal, seasonal, or precarious forms of work.

In addition to procedural shortcomings, the lack of transparency surrounding the functioning of the system is particularly problematic regarding the protection of personal data and the right to privacy. The Law enables extensive processing of a large volume of personal data, including data on beneficiaries and persons connected to them, without adequate safeguards to ensure compliance with principles such as data minimisation and purpose limitation. **Since June 17, 2022**, when the first request for access to information on algorithm was submitted, and **despite the Commissioner for Information of Public Importance and Personal Data Protection upholding our appeals on two occasions**, the Ministry of Labour, Employment, Veteran and Social Affairs has failed to disclose key information regarding the algorithm and source code used in the Social Card Registry. This ongoing lack of transparency raises serious concerns about accountability, as well as the risk of discriminatory outcomes embedded within the system. In March 2025, the A 11 Initiative initiated administrative dispute due to the silence of the administration in this case. However, to date, no information has been provided regarding the progress or outcome of these proceedings.

International monitoring bodies have also raised concerns in this regard. The European Commission against Racism and Intolerance noted that the design and implementation of the system raise serious questions regarding its impact on vulnerable groups, particularly Roma, and emphasised the need for strong safeguards against discrimination, transparency in algorithmic decision-making, and effective remedies.[11]

More broadly, the Social Card system reflects a wider structural issue: the digitalisation of public administration in Serbia is advancing without a corresponding development of human rights safeguards. Privacy and data protection are not treated as integral components of system design, but rather as secondary considerations. This creates a risk

[11] ECRI, ECRI Report on Serbia (sixth monitoring cycle), Adopted on 9 April 2024, Published on 27 June 2024, available at: https://rm.coe.int/fourth-ecri-report-on-serbia/1680b06413, p. 28.

of institutionalising automated decision-making processes that significantly affect individuals in vulnerable socio-economic situations, without sufficient transparency, accountability, or access to remedies.

Serbia should urgently suspend the use of the Social Card system for decisions leading to the reduction or termination of social benefits until full compliance with human rights and data protection standards is ensured. The authorities should conduct a comprehensive and independent review of the system, including its legal framework, algorithmic functioning, and practical implementation, with the meaningful involvement of civil society, equality bodies, and data protection authorities.

In order to improve the protection of most vulnerable population from discrimination in their access to social benefits, Serbia should:

→ suspend the implementation of the Law on Social Card and ensure that adequate safeguards are in place to prevent violations of rights to non-discrimination, due process of the law and privacy rights of persons accessing social protection programmes.

→ ensure full transparency of the system, including disclosure of the underlying algorithm and data sources, in line with the Law on Free Access to Information of Public Importance. Particular attention must be paid to preventing discriminatory impacts, especially on Roma and other vulnerable groups, including through regular impact assessments and independent oversight.

Forced evictions and Roma access to adequate housing

Serbia has yet to ensure effective implementation of the Law on Housing and Building Maintenance (2016), which introduced procedural safeguards in eviction and resettlement cases. In practice, these safeguards remain largely ineffective. To date, there have been no recorded cases in which the competent authorities have fully complied with the legal requirements in situations involving evictions from informal Roma settlements.

Forced evictions continue to be carried out without the compliance of key procedural guarantees, including adequate prior notice, access to effective legal remedies, and the provision of alternative accommodation. This indicates that the primary challenge lies not in the legislative framework itself, but in its inconsistent and selective application by the authorities.

Structural shortcomings in housing policy persist. Serbia has still not adopted a comprehensive National Housing Strategy, and systemic measures to improve living conditions in informal settlements and access to adequate and affordable housing for

vulnerable groups remain limited. This is reflected in continued substandard living conditions in a large number of Roma settlements and the absence of sustainable housing solutions. All of this have led the UN Committee on Economic, Social and Cultural Rights to express its concern over the limited provision of social housing to Roma and other disadvantaged and marginalized individuals and families and deteriorating standard of living of those living in social housing. However, no measures were taken to address these areas of concern.

Recent cases documented by A 11 Initiative confirm these concerns. Evictions related to urban development projects have been carried out without adequate safeguards, leaving Roma families without alternative accommodation.[12] In other cases, families who lost their homes due to fires were not provided with emergency housing support, resulting in situations where even those families with infants were left without shelter.[13]

Evictions were carried out without formal administrative decisions, thereby circumventing legal safeguards under domestic law and international human rights standards. In March 2023, the informal Roma settlement "Antena" faced demolition through a mechanism that classified homes as "communal waste," avoiding the issuance of formal eviction decisions and, consequently, the obligation to provide alternative accommodation. Following a request by the A 11 Initiative for Economic and Social Rights, the European Court of Human Rights granted an interim measure, halting the eviction, although several homes had already been demolished.[14] This case illustrates a troubling practice of bypassing procedural guarantees by reclassifying homes in order to evade legal responsibilities.

A similar pattern is evident in subsequent cases. In February 2025, four families were forcibly evicted from an informal settlement in Dunavska Street in Belgrade in the context of a public development project, without prior notice or formal decisions, and in violation of applicable legal standards. The alternative accommodation provided was manifestly inadequate. At the same time, conditions in the "Reva" settlement in Belgrade—where residents formally hold contracts and registered residence—remain far below minimum standards of adequate housing. In response, the A 11 Initiative has submitted a complaint to the Commissioner for the Protection of Equality. Taken together, these cases highlight systemic shortcomings in the protection of the right to adequate housing, including a recurring practice of bypassing administrative procedures designed to safeguard affected individuals.

Particular concern arises from recent legislative developments in the area of enforcement. Amendments to the Law on Enforcement and Security have not introduced adequate

[12] A 11 Initiative, "Grad Beograd zbog Linijskog parka prinudno iselio romske porodice", https://www.a11initiative.org/grad-beograd-zbog-linijskog-parka-prinudno-iselio-romske-porodice/

[13] A 11 Initiative, "Nadležni organi ostavili romsku porodicu s bebom na ulici nakon požara…", https://www.a11initiative.org/nadlezni-organi-ostavili-romsku-porodicu-s-bebom-na-ulici-nakon-pozara-umesto-postovanja-zakona-upiru-prstom-jedni-na-druge/

[14] More details in „A System Adverse to the Poor – Report on Economic and Social Rights in Serbia in 2024", A 11 – Initiative for Economic and Social Rights, Case Study: Informal Settlement "Antena", avaliable at: https://www.a11initiative.org/wp-content/uploads/2025/12/A-System-Adverse-to-the-Poor.pdf

safeguards to prevent evictions that may result in homelessness, especially for individuals and families living in extreme poverty.[15] And although the proponents of the law announced these changes as solutions that would prevent the evictions of people who have no other home, the adopted solutions in practice do not reflect this problem in the right way. As highlighted in civil society analysis, this represents a missed opportunity to align the legal framework with international human rights standards and to ensure that the enforcement of claims does not lead to violations of the right to housing. In practice, the current framework continues to allow for evictions without sufficient assessment of proportionality or the availability of alternative accommodation, thereby disproportionately affecting the most vulnerable.

In addition, in some cases social protection institutions still respond to housing crises by proposing separation of family members as the only available form of accommodation, placing children and adults in separate shelters.[16] Such practices raise concerns regarding the protection of the right to family life under European Convention on Human Rights and Fundamental Freedoms and puts most vulnerable individuals and families at greater risk when they are faced with the eviction procedures.

Overall, forced evictions disproportionately affect Roma communities and individuals living in extreme poverty, raising serious concerns regarding compliance with the right to adequate housing under Article 11 of the International Covenant on Economic, Social and Cultural Rights. They are also not in line with standards established by CESCR General Comment No. 7, which require that evictions be carried out only as a last resort, with full procedural safeguards and the provision of adequate alternative housing.

In order to improve access to adequate housing for Roma and other vulnerable individuals and groups, Serbia should:

→ Serbia should ensure the effective and consistent implementation of the Law on Housing and Building Maintenance by fully applying procedural safeguards in all eviction cases, including prior notice, access to remedies, and provision of adequate alternative accommodation. Amendments to the Law on Enforcement and Security should introduce explicit safeguards to prevent evictions leading to homelessness, including mandatory proportionality assessments and obligations to secure alternative housing for vulnerable individuals and families. Serbia should also urgently adopt and implement a comprehensive housing strategy, with targeted measures for Roma communities and other vulnerable groups and ensure that responses to housing crises do not result in family separation.

[15] A 11 Initiative, "Analiza: izmene Zakona o izvršenju neće sprečiti izbacivanje najsiromašnijih na ulicu...", https://www.a11initiative.org/analiza-inicijative-a-11-izmene-zakona-o-izvrsenju-nece-spreciti-izbacivanje-najsiromasnijih-na-ulicu-propustena-prilika-da-se-zastiti-jedini-dom/

[16] Alternative Report to The United Nations Committee on The Rights of the Child, The A 11 Initiative for Economic and Social Rights, p. 10, avaliable at: https://www.a11initiative.org/wp-content/uploads/2025/04/Submision-to-the-CRC_-A-11-Initiative.pdf

Denial of parental and child allowance to Roma children

The Law on Financial Support to Families with Children (LFSFC) continues to raise serious concerns regarding its compliance with Serbia's international human rights obligations, particularly in relation to the right to equality and non-discrimination. Despite repeated recommendations from international human rights bodies, the discriminatory effects of certain provisions remain unaddressed.

Article 25 of the Law conditions access to parental allowance on children's school attendance and immunization status. Although formulated as neutral requirements, these conditions have a disproportionate impact on Roma children, who face well-documented structural barriers in accessing both education and healthcare services. Available data consistently illustrates these disparities.[17] These systemic gaps directly affect Roma families' ability to meet the eligibility criteria for parental allowance.

In its 2022 Concluding Observations, the UN Committee on Economic, Social and Cultural Rights expressed concern over the conditionality of parental allowance and its discriminatory impact, urging Serbia to revise the Law and remove conditions that hinder equal access.[18] However, no meaningful steps have been taken to implement these recommendations.

An additional exclusionary provision limits eligibility for parental and child allowance to a maximum of four children per family, with very limited exceptions. This limitation disproportionately affects Roma families, who are overrepresented among larger households. Despite its clear exclusionary impact, this provision has not been subject to public debate or legislative reconsideration.

Even though the Law was amended in 2024, the amendments did not address previously identified concerns. The eligibility criteria for parental allowance remain unchanged, despite their recognized discriminatory effects, and no further legislative initiatives have been announced. This indicates a continued lack of recognition of the issue, resulting in the ongoing exclusion of the most vulnerable children in practice.

[17] According to research, one in six marginalized Roma children of school age is not enrolled in education, and the primary education completion rate among Roma girls is only 57%, compared to 93% for non-Roma girls. UNDP, Roma at glance, Serbia, available at: https://www.eurasia.undp.org/content/dam/rbec/docs/Factsheet_SERBIA_Roma.pdf, page 2. Early childhood education enrolment is also alarmingly low: only 7% of Roma children are enrolled, compared to 61% in the general population. Similarly, only 35% of Roma children are fully vaccinated on time, compared to 69% among other children (UNICEF, 2019). Serbia Multiple Indicator Cluster Survey 2019 and Serbia Roma Settlements Multiple Indicator Cluster Survey 2019, Statistical Snapshot, page 37, available at: https://www.unicef.org/serbia/media/16301/file/Serbia%20(National%20and%20Roma%20Settlements)%202019%20MICS%20Statistical%20Snapshots_English.pdf

[18] CESCR, Concluding observations on the third periodic report of Serbia, 6 April 2022, E/C.12/SRB/CO/3, para. 50.

These outcomes could have been prevented had the competent authorities complied with their legal obligation to assess the impact of legislation on vulnerable groups.[19] In its submission on the Draft Amendments, the A 11 Initiative explicitly reminded the relevant Ministry of this obligation, as well as of the general recommendation issued by the Commissioner for the Protection of Equality reminding the authorities of this newly introduced obligation in legislative procedures. Nevertheless, these inputs were not taken into account, and no such assessment was carried out.

In order to ensure social inclusion of Roma, in the field of financial support to families with children Serbia should:

→ Amend the Law on Financial Support to Families with Children to remove conditionalities under Article 25 that disproportionately exclude marginalized Roma children from accessing parental allowance.

→ Abolish the limitation on the number of children eligible for parental and child allowance, in order to ensure equal access for large families, particularly those in vulnerable situations.

Effectiveness and Independence of Human Rights Bodies

Over the past year, the performance and public role of independent human rights institutions in Serbia have further weakened, raising concerns about their capacity to effectively fulfil their mandates. In several instances involving serious and widely reported human rights violations, reactions by these bodies were either absent or significantly delayed, undermining their preventive and corrective function. Reports on the alleged use of a "sound cannon" during the protest held in Belgrade on 15 March 2025 and the lack of a prompt, proactive response by the Protector of Citizens have been reported by multiple media outlets and civil society organizations.[20]

Even when public statements were issued, they were often limited in scope, lacking clear legal qualification of violations and/or concrete recommendations to competent

[19] Under Article 14(4) of the Law on the Prohibition of Discrimination, public authorities are required to conduct an ex ante assessment of the impact of proposed laws and policies on socioeconomically disadvantaged groups, including their compliance with the principle of equality.

[20] see e.g. N1, "Ombudsman silent on allegations of sound cannon use", and CRTA monitoring reports on protest-related human rights concerns (2025). Concerns regarding police conduct during public assemblies, including allegations of excessive use of force and arbitrary detention, and the limited institutional follow-up, have been documented by Amnesty International (Serbia reports, 2024–2025) and Belgrade Centre for Human Rights annual reports.

authorities.[21] Such approach has contributed to a perception of reduced independence and diminished institutional credibility.[22]

In addition, there is a broader pattern of limited strategic litigation, weak follow-up on recommendations, and insufficient use of available legal powers, which further constrains the overall impact of these institutions on the protection of human rights.

Having all this in mind, Serbia should:

→ ensure the full independence, accountability, and effectiveness of independent human rights institutions by strengthening their proactive role in addressing human rights violations, ensuring timely and well-reasoned public responses, and aligning institutional practice and public communication with international human rights standards, particularly in the field of equality and non-discrimination.

[21] On the insufficient institutional response to pressures and targeting of civil society actors, see findings by Freedom House in its *Nations in Transit* reports (2024–2025), as well as reports by Civil Rights Defenders.

[22] The limited use of ex officio powers and weak follow-up on recommendations by independent bodies have been noted in analyses by European Commission, *Serbia Report 2024*, and subsequent civil society shadow reports (2025).