



THE KVINNA TILL KVINNA FOUNDATION

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# EU ENLARGEMENT PACKAGE 2026 **INPUT FOR EU ACCESSION COUNTRIES**

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## THE KVINNA TILL KVINNA FOUNDATION

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The Kvinna till Kvinna Foundation has defended women's rights since 1993.  
For every woman's right to be safe and to be heard.

Today we are one of the world's leading women's rights organisations, working directly in areas affected by war and conflict to strengthen women's influence and power. We work closely together with over 100 local partner organisations across 20 countries to end violence against women, reach lasting peace and close the gender gap once and for all.



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# INTRODUCTION

30<sup>th</sup> April 2026

The **Kvinna till Kvinna Foundation** is glad to provide input to the European Commission 2026 Enlargement Package. With this collective input, we aim to provide a shared gendered analysis of political, economic and social developments in Western Balkan and Eastern Europe accession countries affecting the pace of reforms. Particular focus is on the Fundamentals of Accession including democracy, Public Administration Reform; Rule of Law and Fundamental Rights (Chapters 23 and 24); Statistics (Chapter 18); Social Policy and Employment (Chapter 19); Consumer and Health

Protection (Chapter 28); Foreign, Security and Defence Policy (Chapter 31) and Normalisation of relations between Serbia and Kosovo. Each country includes a set of tailored recommendations for the 2026 Country Reports.

The input is based on analysis, information and reports shared by Kvinna till Kvinna’s partner organisations in the following countries: Albania, Bosnia Herzegovina, Kosovo, Moldova, Montenegro, North Macedonia, Serbia and Ukraine. The following partner organisations contributed to the input:



**Albanian Women's Empowerment Network**  
(Albania)



ALEANCA LGBTI

**Aleanca LGBTI**



**Bolja Budućnost**  
(Bosnia and Herzegovina)



**Helsinki Citizens Assembly**  
(Bosnia and Herzegovina)



**Transparency International**  
(Bosnia and Herzegovina)



**United Women Banja Luka**  
(Bosnia and Herzegovina)



**Kosovo Women's Network**  
(Kosovo)



**Kosovar Gender Studies Center**  
(Kosovo)



**Mitrovica Women's Association for Human Rights**  
(Kosovo)



**GENDERDOC-M**  
(Moldova)



**Roma Women's Platform ROMNI**  
(Moldova)



**Women's Rights Center**  
(Montenegro)



**Coalition Margins**  
(North Macedonia)



**ESE**  
(North Macedonia)



**REACTOR – Research in Action**  
(North Macedonia)



**Humanitarian Association Majka, Kumanovo**  
(North Macedonia)



**A 11 – Initiative for Economic and Social Rights**  
(Serbia)



**ASTRA Anti-trafficking Action**  
(Serbia)



**Autonomous Women's Center**  
(Serbia)



**Sandglass**  
(Serbia)



**YUCOM**  
(Serbia)



**Fight for Right**  
(Ukraine)



**Women's Association Sphere**  
(Ukraine)



**Ukrainian Women Lawyers' Association 'JurFem'**  
(Ukraine)

# ACRONYMS

<b>BiH</b>	Bosnia and Herzegovina
<b>CEDAW</b>	Committee on the Elimination of Discrimination Against Women
<b>CRSV</b>	Conflict-related Sexual Violence
<b>CSO</b>	Civil society organisation
<b>EC</b>	European Commission
<b>ECHR</b>	European Court of Human Rights
<b>EIGE</b>	European Institute for Gender Equality
<b>EU</b>	European Union
<b>FIMI</b>	Foreign Information Manipulation and Interference
<b>FRA</b>	Fundamental Rights Agency
<b>GAP III</b>	Joint Communication to the European Parliament and the Council: Gender Action Plan III – An Ambitious Agenda for Gender Equality and Women’s Empowerment in External Action 2021–2026
<b>GBV</b>	Gender-based violence
<b>GEWE</b>	Gender Equality and Women’s Empowerment
<b>GID</b>	Gender- and Identity-based Disinformation
<b>GREVIO</b>	Group of Experts on Action against Violence against Women and Domestic Violence
<b>IDP</b>	Internally displaced person
<b>ILO</b>	International Labour Organisation
<b>IPV</b>	Intimate Partner Violence
<b>Istanbul Convention</b>	Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence
<b>LGBTQI</b>	Lesbian, Gay, Bisexual, Trans, Queer and Intersex
<b>NAP</b>	National Action Plan
<b>NEET</b>	Not in Education, Employment or Training
<b>NGO</b>	Non-governmental organisation
<b>ODIHR</b>	Office for Democratic Institutions and Human Rights
<b>OSCE</b>	Organisation for Security and Cooperation in Europe
<b>SGBV</b>	Sexual and gender-based violence
<b>SLAPPs</b>	Strategic Lawsuits against Public Participation
<b>UNSCR 1325</b>	United Nations Security Council Resolution 1325
<b>UPR</b>	Universal Periodic Review
<b>USAID</b>	United States Agency for International Development
<b>VET</b>	Vocational Education and Training
<b>WHRDs</b>	Women Human Rights Defenders
<b>WPS</b>	Women, Peace and Security



ALBANIA

# 1. INTRODUCTION

Between June 2025 and March 2026, Albania continued its efforts to advance democratic reforms and align its legal and institutional framework with the European Union acquis as part of the EU accession process. Progress has been noted in certain areas related to governance reforms and EU integration; however, persistent challenges remain in ensuring the full implementation of gender equality commitments and strengthening women's participation in decision-making processes.

Women's rights organisations and civil society actors have continued to play a key role in advocating for gender equality, particularly in the areas of political participation, protection from gender-based violence, and economic empowerment. Despite a relatively strong legal framework promoting gender equality, including the adoption of the Law on Gender Equality implementation gaps remain, especially at the local level.

During this period continued the ongoing discussions around electoral reform, public administration reforms, and governance transparency, all of which have implications for women's access to decision-making structures. Structural barriers, including gender stereotypes, limited access to political groups and financial resources, and online harassment targeting women in public life, continue to affect women's political engagement.

Women as representatives of women human rights organisations have been attacked due to their public engagement in protecting the Law on Gender Equality. Civil society organisations have emphasised the need for stronger institutional accountability, stronger provision of direct social services especially at local level, improved monitoring of gender equality policies, and enhanced protection mechanisms for women participating in political and public life.

# 2. WOMEN'S POLITICAL PARTICIPATION

Albania maintains one of the highest levels of women's representation in parliament in the Western Balkans due to the introduction of gender quotas in the Electoral Code. However, despite improvements in formal representation, women continue to face structural barriers that limit their effective participation and influence in political decision-making. Women remain underrepresented in leadership roles within political parties, senior government positions, and especially at the local government level. During the reporting period, discussions around electoral reform and democratic governance continued. While gender quotas remain in place, civil society organisations, have highlighted the need for stronger enforcement mechanisms to ensure that women candidates are placed accordingly on electoral lists and that sanctions for non-compliance are effectively applied.

Women's political participation at the municipal level remains unequal. Although some municipalities have demonstrated progress in including women in local councils and administrative leadership,

women remain significantly underrepresented in the positions for Mayors and senior local executive roles. Despite legal guarantees and quota mechanisms, several barriers continue to hinder women's political participation, including in particular patriarchal norms and gender stereotypes, limited access to political networks and resources and online harassment and attacks. Evidence shows that women in politics often face higher scrutiny and pressure compared to their male counterparts, and limited access to political networks and resources, in particular access to party leadership structures, campaign financing, and political networks that are critical for electoral success. Also, female politicians and activists increasingly report harassment, intimidation, and gender-based hate speech online, which can discourage political engagement and affect women's visibility in public debate. Finally, women may be present in legislative bodies, but they remain underrepresented in influential leadership positions within political parties, parliamentary committees, and executive institutions.

### 3. DEVELOPMENTS ON GENDER EQUALITY, ANTI-DISCRIMINATION AND LGBTQI RIGHTS

Albania has a relatively comprehensive legal framework on gender equality and anti-discrimination that is broadly aligned with European standards. Key legislation includes the adoption of the Law on Gender Equality in Society and the Law on Protection from Discrimination, which prohibit discrimination on multiple grounds, including gender, sexual orientation, and gender identity. Implementation remains challenging and often limited by insufficient institutional capacity, lack of resources. As a result, progress in advancing gender equality remains slow.

The Gender Equality Law, adopted in November 2025, was developed in a highly polarised and politically sensitive context, characterised by competing narratives regarding its scope and implications. While the reform was part of Albania's EU integration process and aimed at aligning the national legal framework with EU *acquis* and international human rights standards, it also generated significant public controversy. The legislative process for the adoption of the Law faced notable resistance from segments of public opinion, largely influenced by misinformation and concerns regarding key concepts such as the definition of gender, gender-sensitive language, and perceived implications for family structures.

This created a highly polarised environment in which a limited number of civil society actors were required to respond to sustained public and institutional contestation, while simultaneously engaging in formal consultation processes and advocacy efforts. Civil society played a central role in supporting the reform; however, participation was relatively limited in number compared to the broader ecosystem of organisations working on women's rights and human rights in Albania.

During the reporting period, institutions continued efforts to align national policies with EU standards, including the implementation of national strategies related to gender equality and anti-discrimination. However, there are persistent gaps between legislative commitments and practical enforcement. Monitoring and reporting mechanisms remain limited, and local authorities often lack the necessary expertise and resources to effectively implement gender equality policies. The broader civic space has become more constrained, marked by anti-gender narratives, polarised discourse, and increasing pressure on rights-based organisations. These dynamics were particularly evident during debates on the Gender Equality Law.

Rural women, women from marginalised communities, and women with disabilities face additional barriers in accessing services and opportunities. Gender stereotypes and traditional norms remain strong, influencing women's participation in public life and the labour market.

Gender equality mechanisms at the municipal level are under-resourced. Local gender equality officers lack clear mandates, sufficient staffing, and institutional support to effectively implement gender equality policies.

LGBTQI persons continue to face social stigma, discrimination, and exclusion in various areas of life, including employment, education, healthcare, and housing. Hate speech and discrimination against LGBTQI individuals continue to occur both online and offline. While legal protections exist, effective investigation and prosecution of hate crimes based on sexual orientation and gender identity are limited.

## 4. GENDER-BASED VIOLENCE, INCLUDING DIFFERENT FORMS OF VIOLENCE (DOMESTIC VIOLENCE, SRSV, FORCED MARRIAGES, ON-LINE VIOLENCE AND TRAFFICKING IN HUMAN BEINGS ETC.)

Albania has developed a relatively strong legal and policy framework to address gender-based violence, including domestic violence, sexual violence, trafficking in human beings, and other forms of violence against women and girls. Key laws include the Law on Measures against Violence in Family Relations and amendments to the Criminal Code addressing domestic violence, sexual violence, and trafficking.

Despite the legal framework, gender-based violence remains widespread, and significant challenges persist in ensuring effective prevention, protection, and access to justice for survivors. Domestic violence continues to be one of the most prevalent forms of GBV in Albania. Protection orders and emergency protection orders are available through the legal framework, and awareness among institutions has improved over time. However, implementation remains a problem, particularly at the local level. Survivors often face barriers in accessing protection mechanisms, including limited availability of specialised services such as shelters, legal aid, and psychological support. While some municipalities have established local support services, coverage in some others remains inconsistent, especially in rural and remote areas.

Sexual violence continues to be underreported due to stigma, fear of revenge, and lack of trust in institutional responses. Survivors encounter difficulties in accessing specialised services, including forensic examinations, healthcare, and psychological support.

Continues the need for improved training for law enforcement officers, healthcare professionals, and all other actors.

Online violence and harassment targeting women, particularly women in activism, politics, journalism, CSOs, has become a visible concern. Gender-based hate speech, harassment, and threats on social media platforms contribute to a hostile environment that

discourages women's participation in public life. Although existing legislation may cover certain forms of harassment or threats, there is limited recognition of online gender-based violence as a separate issue. Forced and early marriages continue to affect certain marginalised communities, including rural and socio-economically vulnerable groups. Although the legal framework prohibits forced marriage and establishes the minimum legal age for marriage, enforcement remains challenging due to social norms, lack of reporting, and limited community awareness.

Albania is a source, transit and destination country for trafficking in human beings, particularly affecting women and girls for purposes of sexual exploitation and forced labour.

Victim identification and referral mechanisms exist, and cooperation with civil society organisations has contributed to improved support services for survivors. However, challenges remain in ensuring long-term reintegration, economic support, and access to justice for trafficking survivors.

According to data from the Psycho-Social Centre Vatra, an organisation that provides assistance to victims of trafficking in human beings, there has been a noticeable increase in foreign persons both men and women, from countries such as Kazakhstan, China, Colombia, Brazil, and Vietnam who are recruited in their countries of origin and brought to Albania through organised trafficking networks. These individuals are often lured with promises of employment or better economic opportunities and are subjected to exploitation upon arrival in Albania. The forms of exploitation reported include sexual exploitation as well as forced labour.

Approximately 70% of the new cases assisted during the reporting period involved foreigners. This trend indicates a shift in trafficking patterns, with Albania increasingly becoming a destination country for trafficked persons originating from outside the Western Balkans region. This development

requires strengthened cross-border cooperation, improved victim identification mechanisms, and enhanced protection services tailored to the needs of foreign victims of trafficking, including access to legal support, safe accommodation, and long-term

reintegration assistance. Stronger implementation of victim protection mechanisms and for residence permits is needed to be granted to identified victims of trafficking, in line with international standards human rights approaches.

## 5. DEVELOPMENTS ON MINORITY RIGHTS, REFUGEES AND ASYLUM SEEKERS

Women belonging to minority groups, especially Roma and Egyptian women, continue to face multiple and intersecting forms of discrimination. Barriers remain in access to education, employment, healthcare, and social services. Early marriage, poverty, and social exclusion continue to affect women and girls from these communities, particularly in rural and marginalised areas.<sup>1</sup> Albania also maintains an asylum system and has adopted legislation regulating asylum procedures and the protection of refugees in line with international standards,

including the 1951 Refugee Convention. However, asylum seekers and refugees, particularly women, often face challenges in accessing proper services, including healthcare, psychosocial support, and employment opportunities.

It is needed: stronger institutional coordination, improved access to gender-sensitive services for minority women, refugees, and asylum seekers, and greater efforts to address discrimination, social exclusion, and economic vulnerability affecting these groups.

## 6. DEVELOPMENTS ON ENVIRONMENT FOR CIVIL SOCIETY AND CONSULTATIONS

Challenges for civic space in Albania persist. No new laws directly restricting NGOs have been adopted, yet bureaucratic obstacles, limited funding, and administrative delays continue to constrain civil society activities. There has been a noticeable rise in anti-gender narratives, often promoted in public discourse, media and online platforms, which target women's rights and LGBTQI organisations. Women Human Rights Defenders (WHRDs) in Albania continue to operate in a challenging environment, facing online and offline harassment, particularly when addressing sensitive issues such as gender-based violence, sexual and reproductive rights, and LGBTQI+ inclusion. Evidence from AWEN<sup>2</sup> indicates these risks are compounded by weak institutional

protection mechanisms, leading to increased burnout and limited access to support services.

Activists who worked on and advocated for the Gender Equality Law were also subjected to direct attacks from interest groups, including online media platforms, where personal photographs and private data were circulated, and aspects of their private lives were targeted. This was further accompanied by a significant volume of hate speech, offensive comments, and coordinated online harassment campaigns. Such narratives can delay cooperation with local authorities, reduce public support, and discourage women from participating in advocacy and political life.

1 See for example, UNDP Albania, [Economic and Social Empowerment of Roma and Egyptians in Albania](#), and UNDP Albania, [National Action Plan for Equality, Inclusion and Participation of Roma and Egyptians in Albania](#) and Minority Rights Group International, [Roma in Albania](#).

2 [Women as Human Rights Defenders in Albania, Challenges, Contributions and Call for Action](#), AWEN (2025)

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## **7. DEVELOPMENTS ON SOCIAL POLICY AND EMPLOYMENT CONCERNING WOMEN AND OTHER GROUPS**

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Albania has recently introduced a new Law on Alternative Care for Children without Parental Care, aiming to provide a legal framework for foster care, guardianship, and other forms of alternative care. This legislation replaces or complements previous provisions and establishes clearer standards for the protection, placement, and rights of children who cannot be cared for by their parents. Challenges

remain in implementation, including the need for sufficient funding, trained social workers, and effective coordination between national and local authorities. Particular attention is needed for vulnerable groups, including girls, children with disabilities, and children from minority communities, to ensure equal protection and access to services.

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## **8. DEVELOPMENTS ON WOMEN, PEACE AND SECURITY ISSUES AND RESOLUTION OF ONGOING CONFLICTS**

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Challenges persist, including limited funding for women-led peacebuilding initiatives, insufficient institutional mechanisms to include women in security and conflict decision-making and societal barriers that restrict women's influence in

formal peace and security processes. Civil society continues to advocate for stronger implementation of the National Action Plan (NAP) on UNSCR 1325 and inclusion of women in all stages of conflict prevention and resolution.

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## **9. DEVELOPMENTS ON CONSUMER AND HEALTH PROTECTION**

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Access to health services for women, including sexual and reproductive health and rights remains a key concern, particularly for women belonging to minorities, refugees, migrants, and asylum seekers. Structural barriers, including discrimination, limited awareness of rights, language barriers, and insufficient institutional support, continue to restrict equitable access to healthcare. In response to increasing needs, there has been an increase in the number of care workers and the establishment or strengthening of psycho-social units, providing

targeted support to women affected by violence, trafficking, or displacement. These services aim to address mental health, trauma recovery, and access to medical and reproductive healthcare. Challenges remain as minority, migrant, and asylum-seeker women often experience difficulty in accessing Sexual and Reproductive Health Rights (SRHR) services due to lack of legal documentation, cultural barriers, or stigma. Psycho-social and health services remain unequally distributed, with urban centres better equipped than rural areas.

## Recommendations for the 2026 Country Report

1. Recommend authorities to adopt a more comprehensive anti-SLAPP framework, including the decriminalisation of defamation in favour of civil remedies; rapid legal support mechanisms for threatened actors; accountability for public officials; public awareness campaigns supporting civic engagement; and systematic monitoring of cases.
2. Complement the general recommendation on equality and non-discrimination with a specific recommendation to fully align the legal framework on gender-based violence with the Istanbul Convention and relevant EU acquis; and ensure the effective implementation and financing of the National Strategy for Gender Equality 2021–2030 and its Action Plan, with measurable targets and indicators.
3. Introduce a dedicated recommendation to improve the identification, protection and long-term support of women and girl victims of trafficking and GBV in Chapter 24; systematically use sex-disaggregated data for trafficking and enhance coordination between law enforcement, social services, and specialised NGO services.
4. Consolidate and expand sex-disaggregated data across the report and especially in the chapters on trafficking in human beings and organised crime (Chapter 24); regional policy and cohesion (Chapter 22); agriculture and rural development (Chapter 11), Environment (Chapters 27); media and digital transformation (Chapter 10), particularly regarding online GBV and cyber-violence.
5. Explicitly recognise the role of women’s rights organisations in the section on civil society. Stress the role of women’s organisations in providing specialised services to women victims/survivors of violence and highlight the need for sustainable public funding and transparent contracting
6. Deepen the analysis on women’s political participation, including addressing gendered barriers in party structures, candidate selection and access to campaign resources; hate speech and online harassment targeting women in politics; Introduce a recommendation on ensuring effective implementation of gender quotas and on adopting targeted measures to increase women’s political participation at national and local
7. Include an official recommendation in Chapter 19 to harmonise legislation with the Work-Life Balance Directive, Pay Transparency and Women on Boards Directive and the implementation of targeted measures to bridge the gender gap in employment
8. Systematically apply an intersectional lens. Ensure that references to Roma and Egyptian women, rural women, migrant women, women with disabilities, LGBTQI persons and girls at risk of poverty are linked to concrete, gender-sensitive recommendations in the relevant chapters
9. Develop the WPS / UNSCR 1325 section beyond the NAP reference. Maintain the reference to the second NAP on Women, Peace and Security, but go further by reporting on women’s participation in security institutions, peacebuilding initiatives and regional diplomacy
10. Reinforce gender mainstreaming across “non-social” chapters including Chapter 6 (Company Law), Chapter 10 (Information Society and Media), Chapter 11 (Agriculture and rural development), Chapter 18 (Statistics), Chapter 25 (Science and Research), Chapter 26 (Education and Culture), Chapter 27 (Environment and Climate Change).



# BOSNIA AND HERZEGOVINA (BIH)

# 1. INTRODUCTION

The political situation in Bosnia and Herzegovina continues to reflect institutional instability and crisis of governance, namely disputes over state competencies versus entity autonomy. The adoption and approval of the Reform Agenda for BiH under the EU Growth Plan in December 2025 did not result in speeding up the reforms. Instead, it exposed persistent structural weaknesses, as political actors continue to struggle with coordination across different levels of government and frequently disagree on priorities and sequencing.

The Law on the High Judicial and Prosecutorial Council of BiH and changes of the Law on Court of BiH, which are among the key preconditions for opening EU accession negotiations, remain blocked in Parliament.

Ensuring the rule of law, including functioning of judiciary and public administration, protection of fundamental rights, space and mechanisms for consultations with civil society remain issues of concern.

Although the BiH Council of Ministers Strategy for Creating Enabling Environment for Cooperation with the Civil Society for 2025–2029 and the Action Plan for 2025–2026 were adopted in July 2025, the authorities did not make any progress in establishing functional state level mechanisms for consultations with civil society. Members of the new Advisory Board are still not appointed, despite repeated public calls.

# 2. WOMEN'S POLITICAL PARTICIPATION

Early presidential elections took place in Republika Srpska in November 2025 after the BiH Court confirmed the final decision ending Milorad Dodik's mandate. None of the candidates in these elections were women<sup>3</sup>. Women's representation in political decision making in BiH remains at around 20%. In February 2026, a letter was sent to the entity level caucuses of parliamentary parties ahead of the general elections in 2026, reminding them of the proposed amendments to the BiH Election Law advocated by the initiative *"Let's Share Responsibility Equally"*. The amendments propose alternating the placement of candidates on electoral lists and ensuring that the minimum quota of 40 percent women in parliaments is met through compensation lists. The initiative called upon CEDAW recommendations for BiH and CEDAW General Recommendation No. 40, which calls on States parties to ensure equal and inclusive representation of women and men in decision making.

Public financing can directly shape the visibility of women within political parties because it can secure more equal access to campaign resources, advertising, organisational support, training, political academies, and local mobilisation activities. In practice, however, women's caucuses and similar

structures inside parties often do not have dedicated budgets or clear mandates, which limits their ability to influence internal party policies and candidate selection. Party budgets are usually organised through broad generic spending lines, so women's forums and related activities depend on central party budgets, ad hoc support, and internal political dynamics rather than on guaranteed resources.

The public funding system in BiH only partly links funding to the less represented gender, which in practice refers to women in the country's political context. This gender-based component amounts to 10% of party funding in many assemblies, including the Parliamentary Assembly of BiH, but it is absent in the entity parliaments, and some cantonal assemblies. Most cantons have aligned their rules with the state level framework, but this is not the case for both entities and Brčko District, while some cantons still apply unclear criteria or determine allocation by separate assembly decisions. There is no legal obligation to spend this share of public money specifically on strengthening women's political participation, no ring-fenced funding for women's forums or women led party activities, and no standardised or transparent reporting on how these funds are spent.<sup>4</sup>

<sup>3</sup> In contrast, in the regular presidential elections held in 2022, one of the five candidates was a woman – Jelena Trivić, who narrowly lost the race to Milorad Dodik.

<sup>4</sup> *Impact Analysis of Public Financing of Political Parties on the Participation of Women and Youth in Bosnia and Herzegovina* Transparency International BiH, (2026), available in BHS.

### 3. DEVELOPMENTS ON GENDER EQUALITY, ANTI-DISCRIMINATION, AND LGBTQI RIGHTS

In July 2025, the FBiH Parliament explicitly excluded same-sex couples from domestic violence protection under the FBiH Criminal Code, which drew criticism from civil society organisations and the international community. This change has been adopted on the initiative of the Party for Democratic Action (SDA) MP, arguing that “living with another person” without explicitly stating “of opposite sex” implies legal recognition of same sex partnerships, under the guise of protecting women from violence and incriminating femicide.<sup>5</sup> RS Constitutional Court adopted a similar approach in December 2024, by narrowing the definition of the family in the criminal act of domestic violence in the RS Criminal Code, representing a regression in legal protection of LGBTQI rights.

These legal amendments are not isolated developments but reflect a broader and increasingly institutionalised anti-gender agenda shaping laws and

policies across the country. In RS, similar narratives have extended into the education system, including attempts to introduce the publication “Virtue Book – A Handbook for Encouraging Virtues” into school curricula. The publication was widely criticised for promoting discriminatory content, reinforcing gender stereotypes, and relying on outdated and unscientific theories, in contradiction with human rights and education standards. Following repeated complaints by WCSOs, the Gender Center of RS recommended prohibiting its distribution in schools.

This illustrates how anti-gender actors, increasingly embedded within public institutions, are influencing both legislative changes and normative frameworks. Their activities also extend to sustained pressure on feminist activists, journalists, and women’s civil society organisations through smear campaigns, harassment, and public discrediting, further contributing to the shrinking of civic space.

### 4. GENDER-BASED VIOLENCE, INCLUDING DIFFERENT FORMS OF VIOLENCE (DOMESTIC VIOLENCE, SRSV, FORCED MARRIAGES, ON-LINE VIOLENCE, AND TRAFFICKING IN HUMAN BEINGS ETC.)

Harmonisation of legislation on gender-based violence remains limited and uneven across the country, resulting in GBV survivors having unequal protection and limited access to specialised support services, run by women’s CSOs with insufficient public budget support. This remains of high concern, especially in relation to marginalised groups of women. The Federation of BiH strengthened legislative protection against different forms of GBV with changes and amendments of the Criminal Code (effective since August 2025). For the first time in BiH, aggravated murder of a female person (femicide) has been criminalised, with

a prescribed sentence of 10 years to long term imprisonment. New criminal offences also include female genital mutilation, forced sterilisation, stalking, psychological violence, abuse of sexually explicit footage, sexual harassment, and forced marriage, thus criminalizing acts that are recognised as different forms of gender-based violence by the Istanbul Convention standards. The Law also introduces definitions of information and communication technologies, and gender-based violence against women, which enables prosecuting and punishing various forms of technology-facilitated violence.

<sup>5</sup> See news story: [Zahiragić Filed an Amendment to the FBiH Criminal Code, Opposing the Wording that Recognizes Same-sex Unions](#), Klix, 16 June 2025.

In December 2025, Republika Srpska adopted 2026–2032 Strategy for Combating Domestic Violence, with defining four strategic directions aimed at improving prevention, protection of survivors, prosecuting perpetrators, and monitoring implementation of laws, policies, and measures against domestic violence. The new draft law addressing domestic violence and violence against women in Republika Srpska remains on hold, while new legislation has been adopted in the Federation of BiH in March 2025. Brčko District BiH still has double norming of domestic violence as a misdemeanour and criminal offence, which continues to undermine social danger of domestic violence, and limits institutional response toward protection of survivors.

Across the country, data collection on different forms of GBV by institutions remains fragmented and insufficient, focusing on domestic violence. Disaggregation of data based on relationship

between GBV survivors/victims and perpetrators remains sporadically tracked, which hinders recognizing gendered nature of criminal offences, and further institutional reaction. Media reports indicate 5 cases of femicide, and 1 attempted femicide during 2025. Although the number of femicides decreased compared to 2024<sup>6</sup>, the cases revealed absence and/or late and inadequate reactions of the public institutions (police, centres for social work, courts) on (previous) reports of violence by women victims, lack of control on illegal possession of firearms, failure to impose protection orders, limited usage of risk assessments in cases of violence, small number of orders to take (and keep) the perpetrators into custody to prevent escalation of violence, etc. Mandatory and continuous training on survivors' support and understanding GBV by professionals is still missing, which hinders progress in improving institutional response.

## 5. DEVELOPMENTS ON MINORITY RIGHTS, REFUGEES AND ASYLUM SEEKERS

Existing entity policies on domestic violence do not recognise specific measures related to preventing and combating violence against Roma women, which remains an issue of concern. Cases of domestic violence, child marriages, human trafficking, child labour and forced begging in Roma communities continue to be perceived as part of tradition, and not as serious law and human rights violations. Access to general and specialised protection and support services for Roma women and girls remains limited, due to lack of information,

resources, but also prejudices and stereotypes and lack of trust. Roma women continue increasingly facing discrimination both in communication with institutions and in the society in general, most noticeably when it comes to education, employment, access to housing, and health and social protection. Active Roma women's CSOs across the country continue to provide support to communities in cooperation with local public institutions, however, these interventions are limited due to lack of systemic measures and funding.

## 6. DEVELOPMENTS ON ENVIRONMENT FOR CIVIL SOCIETY AND CONSULTATIONS

The trend of shrinking space for CSOs has continued, particularly in Republika Srpska, even though the Foreign Agents Law was declared unconstitutional February 2025. It is especially concerning that CSOs continue to be

portrayed as a "security threat" or an "attack on the constitutional order," while attacks against human rights defenders go unprosecuted, sending a clear message that they will not receive state support.

<sup>6</sup> Based on media monitoring, the Foundation United Women identified 12 cases of femicide in Bosnia and Herzegovina in 2024, committed by current or former intimate partners, and/or close family members of the women victims.

A 2025 Report<sup>7</sup>, highlights the recurring fundamental challenges for Human Rights Defenders (HRDs) including administrative inertia and lack of transparency, adoption of restrictive laws and the lack of dialogue and participatory processes in public policymaking; and inconsistent institutional responses to threats and attacks against activists. Similar trends were highlighted by the UN Special Rapporteur on Human Rights Defenders, Mary Lawlor, following her visit to BiH in June 2025<sup>8</sup>. She specifically drew attention to women human rights defenders, describing them as being “at the forefront of the struggles for human rights and social justice in BiH.”

Given the challenging context for civil society organisations and human rights defenders, The Human Rights House Banja Luka, in cooperation with other initiatives and networks, has prepared a draft Law on Human Rights Defenders of BiH.<sup>9</sup> The purpose of the Law is to provide legal recognition and ensure consistent protection for human rights defenders. The BiH Ministry of Human Rights and Refugees expressed its willingness to act as the official proposer of the legislation.

BiH still lacks a clearly defined domestic framework for managing EU accession negotiations, including

credible mechanisms for civil society participation. Although the Reform Agenda under the Growth Plan for Western Balkans could have been used to test participatory models and prepare institutions and stakeholders for the accession process, the opportunity was missed in the drafting of the Reform Agenda and authorities still have no clear plan for involving civil society in a structured and meaningful way for its implementation, monitoring and evaluation.

While the BiH Council of Ministers (CoM) adopted the Strategy for creating an enabling environment for civil society 2025–2029 in July 2025, the document’s scope and objectives remain insufficiently aligned with the structural challenges affecting meaningful civil society participation. As a result, its adoption has not led to tangible improvements in the broader framework for inclusive and systematic consultations at the state level. In parallel, the CoM Advisory body for cooperation with CSOs, foreseen to support dialogue with civil society has yet to be constituted, with members still not appointed despite repeated public calls, raising further concerns regarding the credibility and operationalisation of state-level cooperation mechanisms.

## 7. DEVELOPMENTS ON SOCIAL POLICY AND EMPLOYMENT CONCERNING WOMEN AND OTHER GROUPS

There were no developments in implementing the EC recommendation to introduce a uniform minimum level of benefits and protection for maternity leave throughout the country, starting by harmonising the definitions of maternity, paternity and parental leave and aligning labour laws across the country with the EU Work-Life Balance Directive or the Pay Transparency Directive. Maternity benefits for unemployed mothers remain uneven and depend on the economic development of individual cantons. In RS, the maternity allowance for unemployed mothers is uniform and amounts to BAM 406, while in the Federation BiH the amount varies significantly depending on the canton. Unemployed mothers in four cantons<sup>10</sup> receive around BAM 1,000, while in other cantons only the guaranteed minimum benefit is paid (55% of the lowest wage in the Federation),

which places women in an unequal position. Fathers’ right to parental leave is not regulated as a non-transferable right in any law, which is contrary to the EU Work-Life Balance Directive (2019/1158) and the ILO standards.

The RS Government has determined the Proposal Law on Temporary Child Support (March 2026), aimed to establish the Alimony Fund. According to the proposal, the RS authorities would assume responsibility for paying child support and subsequently seek reimbursement from parents who fail to meet their obligations. This would represent a key step forward in addressing the issue of irregular child support payments. Similar announcements and initiatives have also appeared in the Federation BiH, but a draft law has not yet been prepared.

7 [Report on Human Rights Defenders, Human Rights House Banja Luka \(2025\)](#)

8 [Report by the UN Special Rapporteur on Human Rights Defenders, Mary Lawlor, on her visit to Bosnia Herzegovina \(2025\).](#)

9 The draft Law has not been seen by the Kvinna till Kvinna Foundation.

10 Sarajevo, Bosnian-Podrinje, Tuzla and Zenica-Doboje cantons.

## 8. DEVELOPMENTS ON WOMEN, PEACE AND SECURITY ISSUES AND RESOLUTION OF ONGOING CONFLICTS

The New National Action Plan for Women, Peace, and Security for 2025–2030, drafted under the leadership of the BiH Ministry for Human Rights and Refugees, Agency for Gender Equality<sup>11</sup>, is still pending adoption. Previous institutional initiatives continued, however primary focus is given to quantitative representation of women in military and security forces, while women's participation in political decision making and reforms and response to war-related sexual violence against women remain insufficiently addressed. Local level WPS initiatives led by women's and human rights CSOs across the country are dependent on international donor support and risk disappearing due to funding cuts.

In November 2025, the 30<sup>th</sup> anniversary of the Dayton Peace Agreement was marked in BiH. Women's CSOs reminded that BiH still does not have a Transitional Justice Strategy and emphasised that the constitutional framework is shaped by ethno-nationalist political interests that neither adequately address the needs and interests of women nor do they contribute to sustainable peace. The BiH Constitution remains gender-discriminatory, as it does neither contain a clear definition of gender equality nor an explicit prohibition of discrimination based on gender and is drafted exclusively in the masculine form. A recommendation issued by the Institution of the Human Rights Ombudsman to eliminate gender-biased language from the Constitution has not been implemented.

## 9. DEVELOPMENTS ON CONSUMER AND HEALTH PROTECTION

There is lack of publicly available information about status of specialised support services for victims of sexual violence established in 2021 within three clinical hospitals in Federation BiH (Sarajevo, Tuzla, Mostar), namely if they are operational and available to sexual violence survivors. Women belonging to marginalised groups, including Roma, women with disabilities, women in rural areas, elderly women face difficulties in access to adequate health care and sexual and reproductive health and rights protection.

Although the right to abortion has been guaranteed by the laws, pro-life initiatives (such as 40 Days for Life Campaign) associated with faith based CSOs are increasingly visible, especially in Herzegovina. The

case of the University Clinical Hospital in Mostar, where prayers for the lives of unborn children were organised on several occasions, is an example in which various institutions refused to act or declared themselves not competent to respond to violations of the Law on Gender Equality, the Law on Patients' Rights, and the Law on Public Assembly. In December 2025, the FBiH Gender Center issued an official recommendation that such activities, which stigmatise women and violate their privacy and dignity, should be clearly regulated and legally restricted. The recommendation called on the Federal Ministry of Health to adopt guidelines regulating public activities in the vicinity of hospitals when they relate to reproductive rights, aiming to ensure adequate protection for patients.

## Recommendations for the 2026 Country Report

1. Closely monitor the implementation of the recommendation to harmonise and improve legislation against domestic and gender-based violence to meet EU *acquis*, and align laws across the country to the Gender Equality Law, to increase the public and political participation of women.
2. Urge BiH authorities to align the Electoral Law with the Gender Equality Law to enhance women's public and political participation including full respect of the 40% gender quota and to adopt targeted measures, including in relation to political party financing, to increase women's representation in elected positions
3. Recommend BiH's authorities to harmonise party financing rules across all levels of government and introduce a clear obligation to earmark and transparently report on the use of public funds linked to the less represented gender, in order to ensure that these resources are used purposefully to strengthen women's political participation
4. Recommend BiH authorities to ensure that participation of civil society, including that of women's CSOs, in the monitoring of the Growth Plan and Reform Agenda implementation is clearly regulated and based on clear eligibility criteria and a transparent, merit-based selection process for participating organisations. Ethnic quotas should not be imposed in such bodies where they risk excluding qualified and independent organisations and undermining the purpose of meaningful civil society participation.
5. Continue monitoring and condemning actions towards restricting civic space, including actions of networks and associations aiming at reversing legislation and policies on gender-based violence, gender equality, and anti-discrimination. Urge authorities to harmonise the Republika Srpska Criminal Code with the BiH Law on Prohibition of Discrimination.
6. Urge the Council of Ministers to revise and strengthen the Strategy for Creating an Enabling Environment for Cooperation with Civil Society (2025–2029) to ensure it adequately addresses structural barriers to meaningful participation, to proceed without delay with the appointment of the Advisory Body for Cooperation with CSOs
7. Continue addressing GBV as a systemic issue requiring a comprehensive response and coordination among authorities. Continue addressing domestic violence, and other forms of GBV, also with regard to rule of law/functioning of judiciary, and recommend ensuring substantial criminal investigations and prosecutions and efficient criminal proceedings
8. Recommend ensuring collection of sex-disaggregated data on all forms of GBV (including femicide) and increasing public budgets support for all forms of specialised assistance provided by women's CSOs
9. Report on the significant barriers Roma women, women with disabilities, victims of human trafficking, women in rural areas, migrant and asylum seeking women, elderly women and other vulnerable categories are facing in access to education, employment and health services, including on sexual and reproductive health and rights, the wide-spread gender-based violence and the practice of forced juvenile marriages affecting Roma girls, and recommend to harmonise the Roma inclusion policy with the EU Strategy for Roma Inclusion 2020–2030
10. Call BiH authorities to adopt a new National Action Plan on Women, Peace, and Security for 2025–2030, and ensure continuous and meaningful involvement of women's CSOs in WPS localisation initiatives. Call on authorities to ensure focus on women's participation in decision making on peace, security, reconciliation and transitional justice besides focusing on representation of women in military and security forces



# KOSOVO

# 1. INTRODUCTION

Kosovo has lacked a functioning government since before the February 2025 snap elections. This has limited progress on the EU accession process; delayed the adoption of several key laws and policies; hindered implementation of the Growth Plan and Reform

Agenda; and stalled progress in the Belgrade–Pristina Dialogue. A new government was formed after the December re-elections, but failure to agree on a President may lead to new elections and contribute to further delays in Kosovo’s EU Accession process.

# 2. WOMEN’S POLITICAL PARTICIPATION

The Law on General Elections and the Law on Local Elections still are not aligned with the Law on Gender Equality (LGE). While the LGE guarantees equal participation of women and men (50%) in decision-making, electoral laws require only a 30% quota, enabling women’s underrepresentation. Women with disabilities, minority and rural women are particularly underrepresented.

Following the 2025 elections, women hold 36% of seats in municipal assemblies and 37% of seats in the Assembly of Kosovo. Since 2007, when the gender quota was first introduced, the percentage of women requiring the quota to secure a seat has decreased substantially, from 72% in 2007 to only 13% in February 2025 (no official breakdown exists yet for the December 2025 elections).<sup>12</sup> This suggests that the quota has contributed to more women being elected. Still, KWN research shows that mainly male-led political parties exert control over what issues are raised and prioritised, leaving little space for women politicians to represent the interests of women or advocate gender equality.<sup>13</sup>

During the 2021–2025 legislature, women led five of 15 ministries (33%). Following the formation of the

new government in February 2026, women occupy only four out of 19 ministerial posts (21%). The number of women Deputy Prime Ministers also has decreased, from two out of three in 2021–2025 to just one out of three in the current government.<sup>14</sup> The 2025 local elections saw an increase in the number of women running for mayor, rising from 13 to 20 candidates. However, the number of women actually elected as mayor declined, with only one woman winning a mayoral seat compared to two in 2021.<sup>15</sup>

KWN research highlights various barriers to women’s political participation, including patriarchal attitudes extending into parties and institutions; gender norms; lack of care services; and inaccessible transportation.<sup>16</sup>

The absence of a functioning government in the past year resulted in the delayed adoption of several key laws and policies, negatively impacting women’s labour rights, gender-responsive budgeting, and other areas. Civil society and other stakeholders fear that once a stable government is in place, laws and policies needed for continued EU reform support may be rushed through, leaving little time for consultation with or oversight by CSOs.

12 [Election Observation Report: Elections for the Assembly of Kosovo](#), Democracy in Action, (2025).

13 [Peace and Security in Kosovo: A Gender Analysis](#), Kosovo Women’s Network (2025).

14 [Peace and Security in Kosovo: A Gender Analysis](#), p. 17; Kosovo Women’s Network (2025); Anadolu Agency, [“Kosovo’s parliament approves new government”](#), 12 February 2026.

15 [“Gender Representation in the 2025 Municipal Mayoral Elections”](#), Democracy for Development, (2025).

16 [Peace and Security in Kosovo: A Gender Analysis](#) Kosovo Women’s Network, (2025) See also [Gender Analysis of Land Transportation in Kosovo](#) KWN, (2025).

### 3. DEVELOPMENTS ON GENDER EQUALITY, ANTI-DISCRIMINATION AND LGBTQI RIGHTS

Kosovo's legal framework on gender equality, anti-discrimination and LGBTQI rights is broadly aligned with international standards, but its implementation is fragmented. The Constitution guarantees human rights and gender equality and allows international agreements to take precedence over domestic laws but does not explicitly reference the Convention on the Rights of Persons with Disabilities or UNSCR 1325 on WPS.

The Law on Gender Equality (LGE) sets out ambitious requirements but has not been fully institutionalised; other laws (e.g. election laws) remain misaligned. Affirmative measures in recruitment and promotion, including in the civil service sector, are not fully implemented. Moreover, the LGE requires gender impact analyses of all draft laws and policies, but no procedure exists to ensure the government fulfils this obligation.

Moreover, gender-responsive budgeting (GRB), as foreseen by the LGE, Sustainable Development Goal 5 and the PEFA Gender Framework, has not been fully implemented; not all budget organisations submit the mandatory GRB annex to the Ministry of Finance; the MTEF no longer includes objectives, indicators, baselines or targets to monitor how budgets

contribute to gender equality aims; and the Law on Public Finance and the Law on Procurement do not institutionalise GRB. While amendments to these laws are underway, the process has lacked transparency and requests to provide input have been ignored. The 2025 central-level Law on Budget was not shared for consultation, and local budget consultations often are inadequately publicised.

The Kosovo Program for Gender Equality (2020–2024, currently being drafted), Rule of Law Strategy (2021–2026) and Transitional Justice Strategy (2024–2034) reference gender equality and women's participation but lack concrete targets, adequate budgets and effective monitoring. Few institutions implement the legal obligation to collect and report gender-disaggregated data to the statistics agency.

While Kosovo legally protects against discrimination based on sexual orientation, LGBTQI+ individuals continue to face social stigma, harassment, threats and intolerance, including from public officials and political actors.<sup>17</sup> The parliament lacks adequate procedures for addressing hate speech and discriminatory rhetoric used by MPs. The Civil Code does not permit same-sex marriage and amendment attempts have been rejected.<sup>18</sup>

### 4. GENDER-BASED VIOLENCE, INCLUDING DIFFERENT FORMS OF VIOLENCE (DOMESTIC VIOLENCE, SRSV, FORCED MARRIAGES, ON-LINE VIOLENCE AND TRAFFICKING IN HUMAN BEINGS ETC.)

Kosovo has significantly improved its legal framework for addressing gender-based violence, amending the Constitution to incorporate the Istanbul Convention (IC) in 2020 and revising several laws in align with IC standards. Several other laws have been revised to

align with IC standards. In 2022, the Ministry of Justice adopted the National Strategy for the Prevention of Violence against Women and Domestic Violence 2022–2026, as well as the State Protocol for the Treatment of Sexual Violence Cases. Subsequently,

<sup>17</sup> [Peace and Security in Kosovo: A Gender Analysis](#), Kosovo Women's Network (2025).

<sup>18</sup> [Kosovo's parliament rejects new law recognising same-sex civil unions](#), EuroNews, 17 March 2022.

in 2023, Kosovo adopted the Law on Prevention and Protection from Domestic Violence, Violence against Women and Gender-based Violence.

Despite advancements, a victim-centred approach to addressing all forms of violence against women has not been fully implemented. Kosovo lacks rape crisis and sexual violence referral centres. Cyber violence and sexual violence are insufficiently addressed in legislation and implementation remains challenging. As of December 2024, approximately 54% of the activities under the National Strategy were fully implemented, 42% partially implemented, and 5.5% had not been implemented.

KWN research shows that although institutions addressing gender-based violence have made some progress in knowledge and attitudes, significant gaps remain.<sup>19</sup> Resource constraints and poor institutional coordination put survivors at risk. Understanding of sexual violence is limited. Harmful attitudes,

including victim-blaming, persist. Authorities continue attempts to reconcile couples, and officials still breach confidentiality. Police lack adequate training and Victim Advocates are understaffed and often absent at police stations. Prosecutors confuse key terms and over-rely on victim testimony, leading to insufficient evidence and low sentencing.

The Institute of Forensic Medicine frequently relies on incomplete reports. Documentation of psychological trauma is inadequate. Judges lack understanding of nuanced offenses, and prosecutions overall remain slow and inconsistent. Knowledge gaps and limited capacities are evident in schools, employment offices, VET centres, health institutions and among social workers. Shelter funding has improved but resources remain insufficient, particularly for reintegration. Most municipalities have not hired social workers specialised in gender-based violence as foreseen by legislation due to issues with central government financing.

## 5. DEVELOPMENTS ON MINORITY RIGHTS, REFUGEES AND ASYLUM SEEKERS

While the legal framework protects minorities, implementation remains a challenge. Hate speech and discriminatory rhetoric is used in election campaigns and parliament with little accountability. Key laws advancing minority rights, such as the Civil Code, IVF Law, Labour Law and same-sex civil union proposals, have stalled amid backlash in parliament, which contradicts Kosovo's existing legal commitments. Roma, Ashkali and Egyptians face systemic racism, including violence, prejudice and hate speech. Minority women face discrimination in

access to education, employment, health and social services. Translations in minority official languages are not always available despite legal obligations.

Minorities remain under-represented in the security sector, including the Kosovo Security Force, where only 4% of troops come from non-majority ethnicities despite a 10% quota. Police forces do not always reflect the ethnic composition of the municipalities they serve, although evidence suggests that could enhance community security and build trust.<sup>20</sup>

## 6. DEVELOPMENTS ON ENVIRONMENT FOR CIVIL SOCIETY AND CONSULTATIONS

Civil society operates in a generally enabling environment that is largely aligned with international standards, but challenges remain. Consultations with diverse civil society actors, including on EU reform processes and peace

processes, such as the Belgrade–Pristina Dialogue, remain insufficient and poorly organised. (W)CSOs, if consulted, could provide buy-in and expertise towards more gender-responsive and inclusive processes.

<sup>19</sup> [Zero Tolerance? Monitoring the Institutional Response to Gender-based Violence in Kosovo](#) KWN, (2025).

<sup>20</sup> [Peace and Security in Kosovo: A Gender Analysis](#), KWN, (2025).

Kosovo recognises CSOs as service providers but lacks a stable contracting framework.<sup>21</sup> The Administrative Instruction on public-private partnership has not been finalised, and there is no dedicated state budget line for CSO support. This limits sustainability; short contracts frequently disrupt the provision of essential services. Other challenges include delayed transfers of funds and bureaucratic procedures. The government recently published its new Strategy for Cooperation with Civil Society for consultation. The draft lacks gender analysis, funding commitments, and alignment with the LGE.

Declining international funding risks undermining the work of think tanks, watchdogs and advocacy-oriented CSOs that play an essential role in holding the government accountable, including related to EU Accession.<sup>22</sup> Insufficient support for (W)CSOs is particularly worrying concerning the rise of anti-rights and anti-gender movements in the region.

While Kosovo has a tradition of volunteerism and giving, private and corporate donations remain largely untapped, due in part to inconsistencies in the legal framework. A Law on Volunteerism has been initiated but not finalised; existing provisions exclude adults.

## 7. DEVELOPMENTS ON SOCIAL POLICY AND EMPLOYMENT CONCERNING WOMEN AND OTHER GROUPS

Only 21% of Kosovar women are formally employed. Women are over-represented among informal workers (65%) exposed to insecure employment, limited rights and economic vulnerabilities, including lower income and pensions.<sup>23</sup> Measures to address informality and low labour force participation must be gender-responsive and “do no harm”.

Factors contributing to women’s low labour force participation include limited care services. Aligning with the EU Barcelona Objectives would enable more women to work, support children’s development and transform unpaid work into paid labour.<sup>24</sup>

Labour and anti-discrimination laws lack harmonisation with the LGE. Termination of a probationary period due to pregnancy is not treated as direct discrimination, and women continue to face discrimination in hiring due to the Law on Labour; the cost of maternity leave falls largely on employers, which can discourage employment of women. Fathers

are entitled to only two days of paid leave, compared to the EU Work-Life Balance Directive’s 10 days of paternity leave and four months of parental leave per parent. This reinforces social norms positioning women as caregivers. The law does not include carers’ leave.

Kosovo’s Law on Safety and Health at Work is broadly based on related EU acquis, but implementation remains a challenge. There are not enough inspectors, and they lack skills for inspecting gender-based discrimination. Sexual harassment at work remains widespread, underreported and poorly addressed. Reforms related to health and safety require a stronger gender perspective, given that women and men have different needs.

The quality of social services remains limited. Municipalities’ capacity in service planning and delivery, data collection, gender analysis, GRB and integrated care generally is weak.

21 Under Threat, and Resilient: The Situation of Women’s Organisations in Kosovo KWN, (2026).

22 Ibid.

23 In the Shadows – A Gender Analysis of Informal Work in Kosovo. KWN, (2024).

24 Who Cares? Demand, Supply, and Options for Expanding Childcare Availability in Kosovo KWN, (2016).

People with disabilities face unequal access to education, employment and services, partly due to outdated and inconsistent legal definitions of disability that leave some groups unrecognised and ineligible for support. Personal assistance is not

recognised as a rights-based service, resulting in lack of regulatory minimal standards, dedicated funding and oversight. Personal assistants, mostly women, operate outside the labour law with no labour right protections and earn less than minimum wage.<sup>25</sup>

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## 8. DEVELOPMENTS ON WOMEN, PEACE AND SECURITY ISSUES AND RESOLUTION OF ONGOING CONFLICTS

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Women have been largely absent from the Belgrade-Pristina Dialogue, particularly in decision-making positions. The Dialogue does not consult sufficiently with civil society, limiting women's (and men's) ability to raise their needs and priorities related to it.<sup>26</sup>

The Law on the Status and Rights of War Victims recognises survivors of sexual violence during

the war but imposes deadlines and limits that leave some survivors, particularly from minority groups, without support.<sup>27</sup>

The National Action Plan on WPS has not been renewed since its expiry in 2015. Prior programs and the forthcoming Kosovo Program for Gender Equality, however, is set to include a pillar on WPS. KWN and other WCSOs are supporting its drafting.

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## 9. DEVELOPMENTS ON CONSUMER AND HEALTH PROTECTION

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The absence of public health insurance disproportionately affects women who often have fewer financial resources. Women with disabilities, rural and minority women face additional barriers to accessing quality healthcare due to limited transportation and weak and/or inaccessible health infrastructure.

Sexual and reproductive health remains a taboo topic, particularly in rural and

conservative areas, limiting women's and girls' access to family planning and contraception. Sexual education still is not a standalone subject in schools.

Although Kosovo has an e-health information system, it is not used by all health institutions. The lack of sex-disaggregated data hampers evidence-based, gender-responsive policymaking.

<sup>25</sup> KWN paper forthcoming, 2026.

<sup>26</sup> [Peace and Security in Kosovo: A Gender Analysis](#), Kosovo Women's Network (2025).

<sup>27</sup> Ibid.

## Recommendations for the 2026 Country Report

1. Call for the adoption of the amendments to the Labour Law in line with the EU Work-Life Balance Directive, including well-regulated maternity, paternity and parental leave and the alignment of the legislation with the Employment Equality Directive and Racial Equality Directive
2. Call for the adoption of the Civil Code and Law on Civil Status to safeguard the fundamental rights of all individuals including those of diverse genders, gender identities and sexual orientations and to eradicate discrimination based on sexual orientation and gender identity in Family law
3. Call for the harmonisation of the Law on Local Elections and Law on General Elections with the Law on Gender Equality to ensure equal representation of women and men in elected bodies
4. Recommend revising the Law on Public Financial Management and Law on Public Procurement to better institutionalise gender-responsive budgeting in line with the requirements of the Law on Gender Equality and Sustainable Development Goal indicator 5.c.1.
5. Continue addressing the issue of the capacities of the judiciary in handling cases of GBV in the section on the functioning of the judiciary and call for better coordination among institutional actors and close cooperation with women's rights CSOs providing specialised services to victims/survivors of violence; Call for the inclusion of clear definitions of Technology-facilitated Gender-based Violence in the Criminal Code.
6. Recommend that the Government establish clear procedures to ensure that gender equality impact assessments and quality assurance reviews of draft laws and policies are conducted prior to their adoption.
7. Call on the Government to meaningfully engage civil society in EU-related reforms, including by establishing monitoring bodies with civil society experts to monitor and advice on reforms, including towards ensuring they are gender-mainstreamed.
8. Call for the adoption of a new Law on Disability that includes all forms of disabilities and clear allocations and labour rights protections for personal assistants.
9. Recognise the role of (W)CSOs in peacebuilding and reconciliation, as well as in providing services, and call on the Government to provide sustained funding for diverse CSOs, including through the new Government Strategy for Cooperation with Civil Society, the finalisation and adoption of the Administrative Instruction on public-private partnership, and the establishment of a dedicated state budget line for support to CSO service providers.
10. Ensure diverse women and women's CSOs are consulted and engaged in the Pristina-Belgrade Dialogue at all levels and include a gender perspective in the Report section on normalisation of relations between Kosovo and Serbia.



# MOLDOVA

# 1. INTRODUCTION

The September 2025 parliamentary elections, in which the pro-European Party of Action and Solidarity (PAS) secured a clear majority, confirmed Moldova's European trajectory despite intense Russian hybrid interference aimed at polarising society and undermining EU integration momentum.<sup>28</sup> The campaign period was marked by coordinated disinformation operations, including online harassment, misogynistic narratives, and gendered attacks targeting women politicians, activists, and journalists, alongside broader efforts to undermine trust in democratic institutions and EU integration.<sup>29</sup>

The governor of the predominantly Russian-speaking and Russian-influenced autonomous region of Gagauzia, Yevgenia Gutsul, was sentenced to 7 years in prison for financial links with Russian criminal groups. The sentencing triggered large demonstrations – with reports of some 7,000 participants in Comrat, the capital

of the autonomous region. International legal representatives pledged to escalate Gutsul's case to European and UN bodies, arguing that prosecutors had singled her out because she represented a community with opposing political views. This highly polarised environment created a chilling context for women's political participation more broadly.

Moldova does not exercise formal control over the Transnistrian context. The Transnistrian conflict context means that gender-based services, legal protections, and EU *acquis* standards cannot be applied to roughly 400,000 people in the breakaway region – a direct *acquis* compliance gap that the EU is now openly linking to the accession progress. Ongoing human rights concerns in the Transnistrian context, concerns regarding freedom of expression, and continued discrimination addressing vulnerable groups remained a key issue during the reporting period.

# 2. WOMEN'S POLITICAL PARTICIPATION

Moldova has made unprecedented strides in women's political participation. According to the 2025 Global Gender Gap Report<sup>30</sup>, women now occupy 40% of parliamentary seats in Moldova. In the executive branch and security sector, significant gaps remain. Only four of 17 Cabinet Ministers are women; in the State Protection and Guard Service, women hold 5% of management positions; and within the Police, around 14% of leadership positions are held by women.

In the 2025 parliamentary elections, in part owing to the mandatory 40% gender quota, women constituted 44% of all candidates, and women now comprise 39.6% of MPs – above the European average. However, key barriers continue to affect women's equal and meaningful participation,

including the persistence of conservative gender roles and stereotypes, deteriorating attitudes towards women's political participation, sexist attacks, violence and harassment targeting women politicians, persistent beliefs that the ideal member of parliament should be a man, women's continued underrepresentation in top political positions.<sup>31</sup>

Moldova continues to be targeted by Foreign Information Manipulation and Interference (FIMI) by Russia. Gender- and identity-based disinformation (GID) is one of the primary focus areas for hybrid threats, where women political actors and LGBTQI community members are instrumentalised by anti-gender actors and harmful homophobic narratives are used widely to polarise public opinion during election campaigns. Yet, most FIMI analyses do not

28 [Observation of the parliamentary elections in Republic of Moldova](#), Parliamentary Assembly of the Council of Europe (PACE), Ad hoc Committee of the Bureau (2025).

29 [Representation, power, and gender inequalities in the 2025 parliamentary elections](#), Center Partnership for Development (CPD), UNDP Moldova, UN Women Moldova (2025).

30 [Global Gender Gap Index](#), World Economic Forum, page 36 (2025).

31 [Representation, power, and gender inequalities in the 2025 parliamentary elections](#), Center Partnership for Development (CPD), UNDP Moldova, UN Women Moldova (2025).

take this into account, and civil society, marginalised community members, and state actors do not yet possess specific skills and capacities to address GID.

Roma women and LGBTQI persons remain largely underrepresented at both local and national levels. While gender quotas exist in electoral legislation, they do not address intersectional barriers, and Roma women are rarely included in party lists in electable positions. Hate speech and discrimination are largely

used against LGBTQI persons as a political tool. Key barriers identified during the reporting period include persistent discrimination based on ethnicity and gender, limited access to education and political networks, lack of financial resources, and absence of institutional support mechanisms such as mentorship or capacity-building programs. Additionally, Roma women candidates face stigma, including from within their own communities, as well as limited visibility in media and public discourse.

### 3. DEVELOPMENTS ON GENDER EQUALITY, ANTI-DISCRIMINATION AND LGBTQI RIGHTS

During the reporting period, Moldova maintained its legal framework on gender equality and anti-discrimination, broadly aligned with European standards. However, implementation remains uneven and largely ineffective in practice, particularly for women facing intersecting forms of discrimination, including Roma women and LGBTQI people.

The anti-discrimination framework remains underutilised, with limited access to remedies and weak enforcement mechanisms. There is no systematic collection of disaggregated data by ethnicity and gender, which hinders the identification and effective addressing of discrimination against Roma women.

Regarding LGBTQI rights, while the legal framework provides a basic level of protection, implementation is limited. Reports<sup>32</sup> indicate LGBTQI persons in Moldova continue to face challenges including violence, unwanted sexual behaviour, persistent discrimination, hate speech and social marginalisation. According to the Annual Report of the Ombudsperson for 2024 (published in October 2025),<sup>33</sup> hate speech and disinformation, especially in public and institutional spaces is a major concern affecting vulnerable groups since such narratives reinforce negative stereotypes and contribute to a hostile environment. The situation is further compounded by continued stigma, lack of effective investigation of hate-motivated incidents as well as insufficient institutional response.

### 4. GENDER-BASED VIOLENCE, INCLUDING DIFFERENT FORMS OF VIOLENCE (DOMESTIC VIOLENCE, SRSV, FORCED MARRIAGES, ON-LINE VIOLENCE AND TRAFFICKING IN HUMAN BEINGS ETC.)

Moldova upgraded its legal and policy framework addressing gender-based violence to progressively align it with international standards and the EU Acquis. In July 2025, Moldova's Criminal Code was amended to

introduce femicide as a distinct legal concept – a significant legislative step towards fuller Istanbul Convention implementation. However, a full consent-based definition of rape is still missing from the Criminal Code.

32 [Report on the situation of LGBT+ rights in the Republic of Moldova GENDERDOC-M, \(2025\).](#)

33 [Annual report on the observance of human rights and freedoms in the Republic of Moldova in 2024, People's Advocate Office of Moldova \(2025\)](#)

In July 2025, Moldova adopted a comprehensive legislative package criminalising digital violence for the first time, further aligning the legal framework with the EU Directive on Combating Violence against Women and Domestic Violence. Stalking, non-consensual sharing of intimate images, and repeated online harassment are now criminal offences. Protection orders were also extended from three to six months. The new provisions entered into force on 14 February 2026. This development is particularly significant for the most marginalised groups, e.g. Roma women, LGBTQI people, or refugee women who, far from their support networks, are at heightened risk of digital abuse and exploitation.

In January 2026, the first national information resource and guidelines dedicated to the prevention of digital violence and the support of women and girls online was launched. Direct complaints of violence can now be registered on the relevant online platform, the national Helpline for Women and Girls. A register of offenders in cases of violence against women and domestic violence had been developed to strengthen inter-institutional coordination and prevent recidivism.

In practice, implementation of existing legislation on GBV remains inconsistent. Significant gaps persist in the response of law enforcement and judicial authorities. Documented cases indicate failures to conduct timely risk assessments, delays in issuing protection orders and a tendency to downplay the

severity of domestic violence. Criminal investigations are often not initiated promptly and sanctions remain limited, contributing to a pattern of impunity.

Roma women and the LGBTQI community members remain disproportionately affected. Documented cases show barriers in accessing legal aid, limited availability of interpretation and mediation services, and discriminatory attitudes from authorities. These factors contribute to underreporting and ineffective investigation of violence against Roma women and LGBTQI individuals. At the same time, there is no systematic collection of disaggregated data by ethnicity and gender, which prevents targeted policy responses.

While civil society has increased its role in case documentation, legal assistance, and advocacy, access to justice and protection for Roma women and LGBTQI persons remains limited in practice. Many services, including in the Transnistrian context, continue to be provided by non-governmental organisations instead of the State, which, compounded with funding shortages, means that some of these services and their accessibility may be severely impacted.

While Moldova's new digital violence law applies nationally and benefits women also in Gagauzia, the region's specific governance structures, deeply entrenched patriarchal norms and values, and social conservatism mean implementation and enforcement face additional local barriers.

## 5. DEVELOPMENTS ON MINORITY RIGHTS, REFUGEES AND ASYLUM SEEKERS

Moldova remains the highest per-capita refugee host, with nearly 140,000 Ukrainian refugees residing in the country. Of these, women make up 39%, children 40%, the elderly approximately 13%, and people with disabilities approximately 19%.<sup>34</sup>

Moldova adopted a National Programme for the Phased Integration of Foreigners (2025–2027), a legal framework on the protection of refugees and asylum seekers, largely aligned with international standards and the EU *acquis*. However,

implementation remains limited, particularly for women from these groups.

Roma women continue to face systemic discrimination in access to services and justice, with no targeted measures ensuring their inclusion or meaningful political participation. Refugee and asylum-seeking women benefit from temporary protection, but face gaps in access to integration, employment, and gender-sensitive support, as well as heightened risks of gender-based violence.

Funding for the displacement response has declined significantly: for 2025, \$206 million was requested, with a further decline to \$159 million projected for 2026 – a drop that reflects reduced available funding, not reduced needs. As

funding from major donors has dwindled, several international organisations have withdrawn from Moldova and many assistance programmes have been terminated, with particularly dire consequences for refugee women.

## 6. DEVELOPMENTS ON ENVIRONMENT FOR CIVIL SOCIETY AND CONSULTATIONS

Moldova's overall environment for civil society organisations is broadly functional but remains marked by persistent structural weaknesses. While there has been some progress during the reporting period in improving the legal framework for transparency and consultations, including a participatory process in the process of drafting the Law on Public Participation, the impact of CSOs on shaping public policy remains limited also due to limited institutional capacities. Parliamentary processes in particular have faced criticism for sporadic hearings and last-minute notifications to civil society stakeholders.

Meaningful participation of women's CSOs, including Roma-led organisations, is limited. These groups

play a key role in advocacy, service provision and documenting cases of gender-based violence, yet their recommendations are rarely reflected in policy. Anti-gender narratives, especially in the regions, such as Gagauzia, continue to undermine women's rights organisations, creating societal resistance to gender equality reforms, as well as anti-LGBTQI narratives. Structural challenges, including unstable funding, further constrain the work of grassroots and Roma women's groups.

In the Transnistrian context, restrictive legislation for civil society organisations persists with NGOs required to disclose detailed information regarding foreign funding.

## 7. DEVELOPMENTS ON SOCIAL POLICY AND EMPLOYMENT CONCERNING WOMEN AND OTHER GROUPS

A staggering 55.7% of all women aged 25–54 were economically inactive in Moldova due to family responsibilities, compared to only 2.5% of men in the same age group citing the same reason.<sup>35</sup> This high rate of inactivity is particularly concentrated among women with children under the age of 3, due to the scarcity of available childcare services. The unequal division of family responsibilities, where women are predominantly responsible for household and care activities, directly limits their participation in the labour market. To respond to this problem, Moldova has expanded early education infrastructure, improving sanitation

and accessibility for children with disabilities and refugees, however, much remains to be done to improve childcare services.

During the reporting period, Moldova made some steps towards further aligning its legislation with the EU Acquis. In March 2026, the Moldovan government approved a draft law aimed at aligning the legislation with the EU Directive on Women on Boards. The draft law requires that by January 1, 2028, women occupy at least 40% of non-executive director positions or 33% of all director positions in joint-stock companies (JSCs) traded on the regulated market.<sup>36</sup>

<sup>35</sup> [Comments submitted by Equality Council from the Republic of Moldova concerning the 19th National Report on the implementation of the European Social Charter, Council of Europe, \(2025\).](#)

<sup>36</sup> [Gender balance in JSC management to be legalized, Shikiriyskaya Tatiana, Logos Press Business Review, 23 March 2026.](#)

Legislation adopted in July 2025 empowered the State Labour Inspectorate to combat violations of occupational safety and health. Furthermore, a new Decent Work Country Programme (2025–2027), agreed upon in June 2025, aims to improve work-life balance through enhanced collective bargaining.<sup>37</sup> While not fully transposed, by early 2026, Moldovan labour market practices began shifting toward EU norms (e.g., removing „negotiable salary“ in job offers) to facilitate the eventual 7 June 2026 deadline for pay transparency.<sup>38</sup>

Starting 1 January 2026, the Labour Code of the Republic of Moldova has been updated to include new provisions on preventing and combating violence and harassment in the workplace. The new amendments to the Labour Code explicitly define the notions of “workplace violence” and “workplace harassment”, prohibiting all forms of violence and harassment.<sup>39</sup>

Roma women continue to face multiple barriers to access formal employment, including discrimination by employers, limited access to education and vocational training, and social stigma. Reports indicate that harassment and exclusion in workplaces persist, while available maternity and family support measures are often inaccessible to women in vulnerable communities. LGBTQI persons continue to encounter discrimination and social stigma in employment, with limited recourse to effective remedies. Overall, structural inequalities, weak enforcement, and lack of targeted support programs hinder equal access to employment and social protections for these groups.

Ukrainian refugees in Moldova continue to face compounding barriers – language, lack of childcare, legal constraints, and wage discrimination. This in turn compounds risks and exposure to SGBV and exploitation. There are, however, ongoing programmes that address these challenges.<sup>40</sup>

## 8. DEVELOPMENTS ON WOMEN, PEACE AND SECURITY ISSUES AND RESOLUTION OF ONGOING CONFLICTS

During the reporting period, women’s participation in conflict response, recovery, and reconstruction in Moldova remained limited, particularly for Roma women and other ethnic minorities. While the government has a National Action Plan on UNSCR 1325, its implementation is uneven, with few mechanisms ensuring meaningful inclusion of women in decision-making related to security, peacebuilding, and community-level conflict resolution.

Roma women’s voices are largely absent in local conflict mediation and recovery processes, despite

facing compounded risks during intra-community tensions. Civil society, including women-led and Roma-focused organisations, continues to provide essential support, such as psychosocial assistance and advocacy, but their input is rarely integrated into formal recovery planning.

However, while civil society and UN-driven dialogue platforms exist (e.g. the Women’s Advisory Board), designed to advance gender-sensitive peacebuilding efforts in the context of the conflict settlement process, women remain structurally absent from formal Chişinău-Tiraspol negotiations.

37 [Republic of Moldova and ILO sign new agreement to advance decent work](#), International Labour Organisation (ILO), 4 June 2025.

38 [Pay Transparency in the Republic of Moldova: Are We Ready to Adopt EU Standards in 2026?](#), 27 March 2026.

39 [Labour Code updated on January 1st: Stricter rules against violence and harassment at work](#), UN Women, 13 January 2026.

40 See for example [Policy Brief - Catalysing the Integration of Ukrainian Talent into the Moldovan Labour Market](#), UNHCR, (2025).

## 9. DEVELOPMENTS ON CONSUMER AND HEALTH PROTECTION

During the reporting period, Moldova maintained a legal framework for health protection, including sexual and reproductive health and rights (SRHR). However, access remains limited for women from marginalised groups, particularly Roma women, refugees, and asylum seekers. Roma women face barriers including discrimination in healthcare facilities, lack of culturally sensitive services, limited information in their language, and financial constraints. Refugee and asylum-seeking women, including those displaced from Ukraine, encounter gaps in access to SRHR services, mental health support, and maternal care.

However, Moldova introduced mobile youth-friendly health centres that offer specialised

sexual and reproductive health services, including in rural areas. These centres ensure access to sexual and reproductive health services without discrimination. Moreover, Moldova has been strengthening mechanisms for the procurement and free distribution of modern contraceptives to 12 vulnerable categories, including young people up to 24 years of age, survivors of violence, and refugees.

In January 2026, the Ministry of Health of Moldova officially approved revised Family Planning protocols and 2024 Safe Abortion protocols, aligning them with World Health Organisation (WHO) standards.

### Recommendations for the 2026 Country Report

1. Recommend further alignment of national legislation with the EU *acquis* on gender equality, human rights and non-discrimination, including adopting missing legislation and policies
2. Recommend amending the Criminal Code in relation to hate crimes and hate speech and the effective enforcement of legal framework to protect the rights of LGBTQI persons; recommend the adoption of a unified methodology for collecting data on hate crimes incidents
3. Recommend further strengthening legal framework on addressing gender-based violence in line with the EU *acquis* and international standards; recommend stepping up implementation of existing legal framework ensuring timely risk assessment, protection measures, and prosecution, with particular attention to Roma women and LGBTQI persons. In addition, recommend amending the Criminal Code of Moldova to include a fully consent-based definition of rape.
4. Include a thorough analysis of women's political participation and issue a specific recommendation to address barriers to women's political participation, including intersectional barriers for Roma women and LGBTQI people
5. When reporting on FIMI, pay special attention to gender- and identity-based disinformation (GID), which is one of the most widespread forms of propaganda. Recommend strengthening the capacities of the Centre for Strategic Communications or the National Agency for Cyber Security to identify, analyse and address GID.
6. Recommend strengthening the system of collection and dissemination of data disaggregated by gender, sexual orientation, ethnicity, or disability across different sectors under Chapter 18 and across all chapters of the report

- 7.** Recommend full involvement of diverse civil society organisations, including those promoting women's rights, LGBTIQ rights and rights of minorities, in policymaking at national and local level and ensure adequate mechanisms for their oversight of EU-accession reforms, including those of the Reform Agenda and the Moldova Growth Plan
- 8.** Further strengthen the intersectional perspective across the reports, especially attention to multiple forms of discriminations against Roma women, minorities and refugees; include a gender-sensitive account of the situation of Ukrainian refugees in the asylum section highlighting their specific needs and challenges in accessing services
- 9.** Highlight the role of women's CSOs in providing specialised services to survivors of gender-based violence, assisting refugee women and vulnerable groups from Ukraine and the current funding and security challenges; address the issue of security of women human rights defenders and the human rights situation in the Transnistrian context
- 10.** Strengthen implementation of the National Action Plan on UNSCR 1325, ensuring inclusive participation of women from minority and marginalised communities in peacebuilding and conflict response; report on EU-Moldova cooperation and exchange on best practices on WPS, as provided in the EU-Moldova Security and Defence Partnership



# MONTENEGRO

## 1. INTRODUCTION

Montenegro is often described as the current frontrunner for the EU Accession, with the prospect to close all negotiating chapters till 2028. On 22<sup>nd</sup> April 2026, the EU Member States approved the formation of a working group to prepare a Treaty on EU accession for Montenegro. The new working group will define the specific terms of Montenegro's accession, tailored to its current circumstances.

While this is a positive step forward for the country, Montenegro faces challenges, including judicial reforms, fighting corruption, tackling organised crime, and resolving bilateral disputes. Also, concerns have been raised by civic actors that fast tracking harmonisation with EU standards can lead to excluding the interested public in reforms and legislative processes.

## 2. WOMEN'S POLITICAL PARTICIPATION

Amendments to the Electoral Law adopted in July 2025<sup>41</sup>, have strengthened the combined gender quota system, raising it to at least 40% for the under-represented gender. These changes include a 2011 CEDAW conclusion that recommended mandatory requirement that, within every three positions on electoral lists, at least one must be reserved for the under-represented gender. Similarly, the Draft Law on Government establishes a 40% quota for women in ministerial positions and stipulates that, in cases where multiple vice-presidential roles exist, at least one must be allocated to the under-represented gender.

Nevertheless, systemic barriers to women's political participation persist, particularly

conservative male leadership and the pervasive misogynistic and sexist discourse targeting women in politics and public life, which remains largely unaddressed. In this context, women in public sphere face heightened exposure to technology-facilitated gender-based violence (GBV). Political parties in Montenegro continue to use women as a sign of formal modernisation, while denying them meaningful influence in decision-making. Women are visible on electoral lists and during campaigns, but remain largely excluded from decisions on appointments, budgets, coalitions, and political priorities, revealing a persistent gap between formal representation and real political power.

## 3. DEVELOPMENTS ON GENDER EQUALITY, ANTI-DISCRIMINATION AND LGBTQI RIGHTS

Despite intensive legislative activity, the growing presence of anti-rights disinformation in the media, particularly narratives targeting women and sexual minorities, indicates a broader mobilisation of anti-rights and anti-democratic initiatives that affect

the adoption of gender equality legislation and the public discourse. A recent survey on attitudes and perceptions of citizens and public administration employees towards gender equality in Montenegro<sup>42</sup> shows that traditional patriarchal norms and

41 Entered into force on 29<sup>th</sup> July 2025.

42 Gender mainstreaming: Attitudes and Perceptions of Citizens of Montenegro and Public Administration Employees on Gender Equality, UNDP (2025).

gendered stereotypes on women in society remain widespread. This entrenched traditionalism can significantly undermine the implementation of gender-sensitive policies and the overall quality of services delivered to vulnerable groups.

The planned amendments to the Law on Gender Equality, expected by the second quarter of 2026, represent an important opportunity to strengthen Montenegro's institutional framework for gender equality. In particular, the amendments should improve the effectiveness of existing gender equality mechanisms and clarify the mandate, authority and coordination role of the relevant coordinating body. The law also needs to be fully aligned with international standards (CEDAW, Istanbul Convention) and the relevant EU *acquis* on gender equality. This includes standards related to equal treatment, protection from discrimination, equal pay, work-life balance, gender balance in decision-making, and protection from gender-based violence.

It is also essential that the amended law contains clear enforcement and sanctioning mechanisms. Without effective sanctions for non-compliance, legal obligations may remain declaratory and difficult to implement in practice. The law should therefore define the responsibilities of public institutions and other relevant actors, establish monitoring and reporting obligations, and provide proportionate,

effective and dissuasive sanctions where those obligations are breached. This would help ensure that gender equality commitments are translated into measurable institutional practice rather than remaining only policy objectives.

There are growing concerns that anti-gender and anti-rights political forces may obstruct its adoption. A strong and visible stance from the EU against any regression in gender equality policies would be both timely and essential.

During the reporting period, there has been no follow up on the Law on Legal Gender Recognition based on Self-Determination which remains blocked by the Government of Montenegro, despite the calls for its urgent adoption by international bodies such as the UN Committee against Torture (CPT) and UN CEDAW Committee. It is to be noted that trans women, particularly those in public life, face increase level of technology facilitated hate speech that includes death threats.<sup>43</sup> These cases of hate speech are not being addressed by prompt institutional response.

The 2025–2029 National Gender Equality Strategy included large portion of the UN CEDAW recommendations. However, to date, no single meeting of the Working Group for monitoring the implementation of Strategy was held.

## 4. GENDER-BASED VIOLENCE, INCLUDING DIFFERENT FORMS OF VIOLENCE (DOMESTIC VIOLENCE, SRSV, FORCED MARRIAGES, ON-LINE VIOLENCE AND TRAFFICKING IN HUMAN BEINGS ETC.)

The National legislation for combating GBV is in place but still need to be harmonised further with Istanbul Convention, EU Directive 2024/1385 on Combating Violence Against Women and Domestic Violence and Victims' Rights Directive. Measures for victim protection during criminal proceedings, such as restraining and eviction orders and other measures that are available in misdemeanour proceedings need to be included in the Criminal Procedure Code.

During the reporting period, the Draft Law on Amendments to the Criminal Code of Montenegro introduced femicide as a specific form of aggravated murder of a female person 'motivated by gender-based reasons' (article, 144 point 9). To avoid difficulties in the legal qualification of femicide, Women's Rights Center proposed amendment that would specify 'gender-based reasons', strengthen the use of security measures and ensure provisions to support children of victims of femicide.

43 Latest case of attacks to Ida Marković, trans rights activist and psychologist. See more at: <https://rtcg.me/vijesti/drustvo/818697/kvir-montenegro-prijetnje-otmicom-i-nasiljem-upucene-idi-markovic-ne-smiju-proci-nekaznjeno.html> (in local language).

There is no evident progress in adopting the changes of the Law on Protection Against Domestic Violence, drafted in 2023. The planned amendments to the Law should be used to strengthen victim protection, improve institutional accountability and ensure full harmonisation with the Istanbul Convention and EU acquis, particularly Directive (EU) on Combating Violence Against Women and Domestic Violence. However, the current draft remains problematic, as its definitions are not fully aligned with the Istanbul Convention. The law should therefore revise the relevant definitions, introduce stronger child-safeguarding provisions, ensure urgent and immediately enforceable protective measures, provide for automatic firearm restrictions in domestic violence cases, require updated risk assessments before protective measures are lifted, and ensure effective monitoring and accountability mechanisms for institutions responsible for protection and enforcement.

Monitoring of the work of the prosecution and court proceedings in domestic violence cases<sup>44</sup>, as well as the 2025 analysis of sentencing policy in domestic violence cases conducted by the Women's Rights Center, show only limited progress in the way prosecutors and courts handle cases of victims/survivors of GBV. Significant challenges remain, particularly in sentencing policy. These include lenient penalties, the low number of imposed protective measures and the insufficient application of the *Sentencing guidelines* issued by the Supreme Court in December 2025.

Although launched in 2019, Montenegro still awaits the Unique Database on Gender Based Violence to become operational. The key problem concerns the

fact that officers of the Police Directorate still do not enter data on reported domestic violence. A detailed review of the entered data also noted that the quality of information is often unsatisfactory. For this reason, it was assessed that there is a need for additional training for centres for social welfare and particularly police officers.

The Operational Team for the fight against family and gender-based violence, in its mid-term report<sup>45</sup>, called for a stronger and more coordinated institutional response to ensure the protection of children who witness domestic violence, highlighting repeated failures of Centres for Social Welfare to act urgently, conduct timely risk assessments, and effectively communicate with other actors, as well as shortcomings in court practices in applying Istanbul Convention standards and prioritizing child safety over parental contact requests.

The Law on Free Legal Aid still needs to be amended to include specialised legal support provided by non-governmental organisations among legal aid providers supported by state funding, particularly because they cover most of the legal representation required by women. Similar practice exists in EU countries such as Croatia, where authorised organisations are recognised as free legal aid providers by the Law<sup>46</sup>, under the condition they have a hired person who has graduated from a law school, passed the bar or state exam and has at least two years of work experience in the profession, or an appropriate scientific degree. Additionally, organisations must have concluded a contract on liability insurance for damage caused by the provision of legal aid, in the amount of at least 50% of the insurance prescribed by the Law on the Bar.

44 [Monitoring Report on the Normative Framework for Combating Gender-Based Violence in Montenegro](#), Women's Rights Center, (2026).

45 [Semi-Annual Report of the Operational Team](#) only available in Montenegrin.

46 More on this at: <https://www.zakon.hr/z/286/Zakon-o-besplatnoj-pravnoj-pomoći>

## 5. DEVELOPMENTS ON MINORITY RIGHTS, REFUGEES AND ASYLUM SEEKERS

Women (WWD, rural women, Roma and trans women) continue to face multiple forms of discrimination<sup>47</sup>. Roma and Egyptian women and girl still don't have access to basic services as education, healthcare and employment<sup>48</sup>. Only 7 percent of children in Roma settlements attend secondary school. Although stipulated in the Law on Social and Child Protection, personal assistance is still not available to most people with disabilities. The regulations further limit this right exclusively to adults who simultaneously

use certain material benefits and are in the education system or in employment, denying it to many people in need. According to publicly available information, personal assistance is currently licensed for only 49 users nationwide, which is an unacceptably small coverage, especially compared to the number of people with disabilities only placed in closed and semi-closed institutions<sup>49</sup>. Such lack of essential services also affects the position of women as major caregivers in Montenegro.

## 6. DEVELOPMENTS ON ENVIRONMENT FOR CIVIL SOCIETY AND CONSULTATIONS

The involvement of civil society in policymaking remained formal and selective, since the last reporting period. The overall environment for civil society remains insufficiently enabling. Persistent concerns include limited access to information, inadequate public consultation practices, and various forms of pressure and targeting of critical civil society actors. These trends point to the need for stronger safeguards for civic space and more effective institutional responses to threats, smear campaigns, and other forms of pressure aimed at discouraging independent civic action and public criticism.

As an example, the latest amendments to the Law on Free Access to Information introduced the obligation that „each party in an administrative dispute, which is initiated due to the silence of the administration, shall bear its own costs“. Such a provision may discourage citizens, NGOs and media outlets from initiating administrative disputes to

exercise their constitutional right to free access to information when public authorities fail to respond, as they would be required to bear their own legal costs even in cases caused by administrative silence. The EC issued a positive opinion on the Law, but the assessed version did not include the above amendment<sup>50</sup>. The new Law additionally stands against recommendations of international bodies, such as SIGMA (OECD&EU)<sup>51</sup>, demonstrating unilateral acting of the government, which keeps ignoring public dialogue and re-introduces already seen anti-democratic practices of previous regimes.

Anti-gender and anti-rights narratives influence the public discourse, targeting feminist organisations as enemies of tradition, family and nation, making them frequent subjects of reputational attacks. It is a deliberate strategy to weaken CSO watchdog role and to silence critical voices. Women's rights organisations and human rights CSOs

47 Harmful gender norms that affect the position of women in society have been addressed by several reports, such as the UN Human rights Committee (ICCPR in March 2025 and UPR in May 2023), CEDAW (June 2024) and CoE GREVIO (November 2024) including the EU Delegation CLIP 2025–2027 (January 2026).

48 UN CEDAW Committee Recommendations to Montenegro, 2024

49 More on this at: <https://umhcg.com/novosti-me/saopstenje-za-javnost-personalna-asistencija-je-pravo-a-ne-privilegija-niti-socijalna-usluga/>

50 See more at the link: <https://www.cdtmn.org/2026/01/15/pes-kao-nekad-dps-kontinuitet-sabotiranja-slobodnog-pristupa-informacijama/>

51 Full SIGMA opinion find at the link: <https://www.gov.me/dokumenta/a4508d9f-5e68-4525-b3da-8bd54a52385c>

remain essential democratic actors as they are often at the forefront of resisting anti-EU, anti-gender and disinformation campaigns. They translate abstract EU norms, such as rule of law, equality, participation and accountability into concrete local practices. They connect environmental justice, social

rights, and gender equality and diligently involve in policy making and monitoring of legal and human rights standards. Crucially, women's CSOs also challenge the false choice often promoted by anti-EU actors that societies must choose between tradition and democracy.

## 7. DEVELOPMENTS ON SOCIAL POLICY AND EMPLOYMENT CONCERNING WOMEN AND OTHER GROUPS

Following the European Commission's recommendation to adopt and implement the Law on Social and Child Protection, the Law on the Protection of Equality and Prohibition of Discrimination, and amendments to the Labour Law, Montenegro has made visible legislative progress, although effective implementation remains the key challenge.

The new Law on the Protection of Equality and Prohibition of Discrimination was adopted in December 2025, introducing broader protection against discrimination, including intersectional, systemic and multiple discrimination, as well as stronger procedural safeguards such as rules on the burden of proof, protection from victimisation, interim measures and collective actions.

Amendments to the Law on Social and Child Protection were adopted by Parliament in April 2026, strengthening the legal basis for the development of social and child protection services, including support for foster care, the Barnahus model for child victims and witnesses of violence, support services for victims and vulnerable groups, respite care, psychosocial support, intensive family support and social mentoring.

Amendments to the Labour Law were adopted by Parliament on 7 April 2026, with the aim of further aligning labour legislation with the EU acquis, including the EU Work-Life Balance Directive. In this regard, the amendments introduce fathers' entitlement to 10 working days of paid leave

following the birth of a child and provide for the extension of parental leave from 12 to 14 months after childbirth, including two months reserved exclusively for fathers as a non-transferable portion of parental leave. While these changes represent an important step towards improving social protection, anti-discrimination safeguards and the more equal distribution of unpaid care work, the 14-month parental leave model will only become applicable from the date of Montenegro's accession to the EU, which delays its practical impact.

Montenegro still faces lower employment rate of women (47,2%) than of man (53,8%)<sup>52</sup> Occupational segregation is widespread in Montenegro, with significantly more women employed in wholesale and retail trade, education, health and social protection<sup>53</sup>. This translates in lower wages, often barely surpassing the legal minimum, in so called *feminised* occupations. High-paying occupations are still predominantly reserved for men, such as construction, transport and other engineering activities. Such occupational segregation is particularly evident in pension gap, around 12% according to the latest data from 2024. The most recent available data on *gender wage gap* date back to 2021, indicating a difference of 21%, with no officially updated figures collected since.

A recent gender analysis of Population Census statistics<sup>54</sup> showed gender-specific differences in the reasons why women and men decide to go abroad. Men mostly go in search of better employment and earnings. The causes of the more massive economic

52 [https://www.monstat.org/uploads/files/ARS/2025/3/ARS%20saopstenje\\_2025\\_Q3.pdf](https://www.monstat.org/uploads/files/ARS/2025/3/ARS%20saopstenje_2025_Q3.pdf) MONSTAT (2025).

53 Data gathered from Population Census 2023, MONSTAT.

54 See at the link: <https://womensrightscenter.org/wp-content/uploads/2026/02/Rodna-slika-opstina-u-Crnoj-Gori.pdf>

migration of men compared to women can also be found in various cultural, social and economic factors. Family reasons, on the other hand, are the main motive for female migration. This can mean family reunification (with a husband who previously left for economic reasons). Such gender differences in migration motives indicate a still strong traditional division of gender roles, with long-term implications for women's economic autonomy and their opportunities for independent participation in the labour market.

There is a significant number of single-parent families in which mothers take care of children alone, and their representation in some municipalities exceeds 20% of the total number of families<sup>55</sup>. Their social and economic vulnerability is particularly visible in the risk of poverty data. According to MONSTAT, households in which families consist of one adult with at least one

dependent child are at twice the risk of poverty compared to other households<sup>56</sup>.

Montenegro ratified ILO 190 Convention on Violence and Harassment, but its provisions are still not transposed through the Law prohibiting harassment at work<sup>57</sup>. According to the Convention, employers are meant to establish procedures for the prevention, reporting and sanctioning of violence and harassment and to provide training for employers and workers on the prevention of harassment and gender-based violence. The relevant laws should also prescribe the obligation for employers to provide confidential and safe channels for reporting violence and harassment, as well as guarantees against re-victimisation of victims. The Convention additionally requires the introduction of special support mechanisms for victims of domestic violence (flexible working hours, leave, job protection, etc.).

## 8. DEVELOPMENTS ON WOMEN, PEACE AND SECURITY ISSUES AND RESOLUTION OF ONGOING CONFLICTS

Montenegro has a strategic framework for the implementation of UNSCR 1325 on Women, Peace and Security<sup>58</sup>. While the Strategy remains in force until 2027, the first accompanying Action Plan covered the period 2024–2025, and there is no clear public evidence that a follow-up Action Plan for 2026–2027 has been developed.

More than half of the employees in the defence sector are women indicating the fact that women make up half of the personnel engaged in administrative work. As for the Armed Forces of Montenegro female members are represented in

a percentage of 15.7%. Out of the total number of managerial and command personnel, women make up only 6%, among whom the majority are in the category of officers and non-commissioned officers. In the period ahead, greater attention should be paid to intensifying activities to continuously ensure the availability of all types of advanced training and additional training to female members of the armed forces, which are a prerequisite for successful professional and career development. In addition, there are no women in international missions, operations and exercises and at military-diplomatic and diplomatic missions.

55 The largest number of single-parent families consisting of mothers with children live in the municipalities of Cetinje and Kolašin (over 20% of the total number of families), followed by the municipalities of Nikšić, Herceg Novi and Andrijevica.

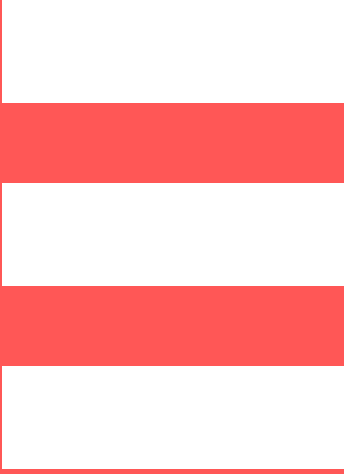
56 See MONSTAT data on at-risk-of-poverty rates by household type for the previous three years.

57 <https://www.skupstina.me/me/clanci/treca-sjednica-drugog-redovnog-zasjedanja-u-2024-godini-12-dan>

58 Government of Montenegro adopted Strategy for the implementation of UNSCR 1325 – Women, Peace and Security and its accompanying resolutions for the period 2024–2027 (2023).

## Recommendations for the 2026 Country Report

- 1.** Call on the authorities to further harmonise national legislation with the Istanbul Convention, EU Directive on Combating Violence Against Women and Domestic Violence, and the Victims' Rights Directive. This should include strengthening protection mechanisms against gender-based violence through amendments to the Law on Protection from Domestic Violence, aligning the definitions of gender-based violence and violence against women across the legal framework with the Istanbul Convention and GREVIO recommendations, and introducing femicide as a specific criminal offence.
- 2.** Call authorities to amend the Criminal Code and include "serious hate speech" as a qualified form of criminal offense hate speech particularly in relation to women in public, in media and political life, including those belonging to LGBTQI community.
- 3.** Recommend further amending the Criminal Procedure Code (CPC) in order to be aligned with the EU Victims' Rights Directive. In addition, Law on Amendments to the Criminal Code of Montenegro should fully be aligned with the EU Directive on Violence Against Women and Domestic Violence.
- 4.** Recommend the adoption of the new Law on Gender Equality and the Law on Legal Gender Recognition based on Self-Determination.
- 5.** Recommend government to recognise women CSO's as service providers by the Free Legal Aid Law since the increasing number of beneficiaries demonstrates the genuine need for specialised and gender sensitive legal aid services, also recognised by GREVIO report.
- 6.** Encourage authorities to ensure appropriate and sustainable funding for women's rights NGOs running specialised support services for women victims of all forms of violence, through funding opportunities that allow for continuous service provision, such as long-term grants.
- 7.** Call on authorities to ensure enabling environment for CSO's by safeguarding women's human rights defenders and independent organisations from smear campaigns and political pressure, strengthening institutional dialogue mechanisms and enforcing their accountability.
- 8.** Recommend full harmonisation of amendments to the Law prohibiting harassment at work with the ILO 190 Convention on Violence and Harassment and provide safe and enabling professional environment for employees, particularly women.
- 9.** Recommend further improvement in collection of gender disaggregated data across different sectors, including on incomes and salaries in line with the EU Pay Transparency Directive currently being transposed through the new Labour Law.
- 10.** Recommend authorities to prioritise the development and implementation of targeted support measures at both national and local levels to address the heightened risk of poverty and socio-economic vulnerability among single-parent families, particularly those headed by women who are disproportionately represented in low-paid and precarious employment sectors.



# NORTH MACEDONIA

## 1. INTRODUCTION

In 2025, limited progress was observed in implementing the European Commission's previous recommendations related to fundamental rights, including improving the protection and fulfilment of human rights and strengthening the implementation of recommendations from international and regional human rights bodies. Long-standing structural weaknesses in the areas of rule of law,

fundamental rights and gender equality remain a significant challenge, largely due to the persistent gap between the adoption of laws and policies and their effective implementation. No progress has been recorded regarding the independence and effective functioning of equality bodies, including the National Ombudsman and the Commission for Prevention and Protection against Discrimination (CPPD).

## 2. WOMEN'S POLITICAL PARTICIPATION

For the last 2025 local elections, the EC noted that the elections were competitive overall, but also stressed that there had been no progress on implementing outstanding OSCE/ODIHR and Venice Commission recommendations before the local vote.<sup>59</sup> An analysis of party programmes for the 2025 local elections conducted by REACTOR<sup>60</sup> shows that while these stressed the importance of transparency, participation and open local government, women are rarely recognised as political actors facing specific barriers. In addition, the analysis shows that party programmes generally do not include measures for women's leadership, local women's forums, balanced participation, or gender-responsive local decision-making.

Overall, the picture is one of formal compliance but weak substantive equality. North Macedonia has quota rules and a legal framework that formally recognises equality, but most recent national and local electoral processes show that these measures are insufficient to guarantee women's real political

influence. The key problems are the weakness of existing quotas in practice, lack of targeted corrective measures, poor support for women's candidacies, underrepresentation in executive and mayoral positions, and a regressive political environment increasingly shaped by anti-gender actors and structural and party-based barriers.<sup>61</sup>

The analysis of the legal framework mapping by Reactor<sup>62</sup> suggests that where quotas exist, they do increase women's presence on candidate lists, but they have had only a limited transformative effect, as women's chances of election, campaign visibility and influence remain constrained by internal party hierarchies and unequal access to resources. The legal mapping suggests a way forward, including possible incentive-based measures, such as linking public party financing to women's representation, creating targeted training and promotional programmes for women candidates, guaranteeing more equal media access, and investing in mentoring and political support for women entering politics.

<sup>59</sup> [Country Report North Macedonia](#), European Commission (2025).

<sup>60</sup> [Local Elections 2025 – Review of the Candidate Lists for Mayors and the Elected Office Holders from a Gender Perspective](#) (available only in Macedonian), Reactor – Research in Action (2026).

<sup>61</sup> [Mapping of the legal framework for gender responsive elections](#) (available only in Macedonian) Reactor Research in action (2026).

<sup>62</sup> Ibid.

### 3. DEVELOPMENTS ON GENDER EQUALITY, ANTI-DISCRIMINATION AND LGBTQI RIGHTS

Developments related to gender equality, anti-discrimination and LGBTQI rights in North Macedonia over the past year have been minimal, due to a challenging political and institutional environment, marked by democratic backsliding and increasing anti-gender mobilisation. Coordinated anti-gender groups, comprising more than thirty actors, have actively opposed gender equality reforms and have influenced public discourse and policymaking, particularly in education and labour rights policies<sup>63</sup>. These developments have contributed to shrinking civic space, particularly affecting organisations working on gender equality and LGBTQI rights.

North Macedonia formally maintains a legal framework for gender equality, including the Law on Equal Opportunities for Women and Men and the Law on Prevention and Protection against Discrimination. However, progress in strengthening this framework or implementing commitments already in place has been limited as in previous years. The implementation of the National Gender Equality Strategy also remains limited<sup>64</sup>. The adoption of the Law on Gender Equality remains stalled despite several years of advocacy and preparation. Anti-gender mobilisation has played a major role in blocking the adoption of this law and in obstructing related reforms, including legislative initiatives addressing workplace harassment and labour-rights protections for women.

The Law on Prevention and Protection against Discrimination remains the key legal instrument addressing discrimination on multiple grounds, including sex, gender identity and sexual orientation. However, implementation challenges persist. Monitoring reports highlight the need to strengthen institutional capacity, improve enforcement mechanisms and ensure consistent application of anti-discrimination provisions across sectors. The negative practices of political influence over the appointment of independent human rights protection

bodies, such as the Commission for Prevention and Protection against Discrimination (CPPD) continued, despite the recommendations in the previous European Commission reports for merit-based appointment and functional independence. No steps were taken toward assuring the legally guaranteed financial autonomy of CPPD neither.

In the beginning of 2026, the Parliamentary Committee on Elections and Appointments proposed three candidates for membership in the Commission. The Network for Protection against Discrimination publicly raised concerns regarding the nomination of one of the candidates, arguing that she does not meet the legal criteria for appointment, particularly with regard to the required professional experience in the fields of human rights, equality and non-discrimination. Such nominations raise concerns about the professionalism and independence of the institution and reinforce concerns about the continued political influence on the CPPD, an institution with a key mandate to ensure protection against discrimination and safeguard the rights of vulnerable groups.

Additionally, recent amendments to the Law on Primary Education and the Law on Textbooks in Primary and Secondary Education erased the scope of protection against gender-based discrimination within the education system, following pressure from conservative actors and anti-gender movements. The adopted amendments removed the grounds of “gender”, “sexual orientation” and “gender identity” from the provisions on the prohibition of discrimination. In addition, provisions related to sexual and reproductive health were removed, and the prohibition of segregation was weakened. References to the Law on Prevention and Protection against Discrimination were replaced with a general reference to the Constitution. The amendments were adopted through an expedited procedure and without public consultation.

63 Gender Analysis of European Commission Country Report for North Macedonia, REACTOR (2026).

64 Shadow Report on the implementation of Gender Equality Strategy, REACTOR (2025).

## 4. GENDER-BASED VIOLENCE, INCLUDING DIFFERENT FORMS OF VIOLENCE (DOMESTIC VIOLENCE, SRSV, FORCED MARRIAGES, ON-LINE VIOLENCE AND TRAFFICKING IN HUMAN BEINGS ETC.)

Despite recent developments, including the preparation of a national strategy and the establishment of a National Coordinative Body, the legislation to address gender-based violence in North Macedonia remains incomplete and is not fully aligned with the EU acquis, including the EU Directive on Violence Against Women and Domestic Violence.

Long-term structural challenges in addressing violence against women remain. These include insufficient financial and human resources, weak prevention measures, irregular data collection, the absence of a comprehensive monitoring and evaluation system, limited institutional coordination, restricted access to protection mechanisms and victim services, and lenient penal policies towards perpetrators. According to Ministry of Interior data<sup>65</sup>, a total of 6,915 cases were reported in 2025, marking a 24% increase compared to 2024 and reaching an average of 19 cases per day, the highest level recorded in the past 10 years. Only 17% of reported cases are registered as criminal offences,

leaving around 83% of perpetrators without criminal prosecution or punishment.

The situation of women survivors of domestic violence is further aggravated by the economic consequences of violence and limited financial support mechanisms. Economic insecurity often forces women to remain in abusive relationships or prevents those who leave from achieving economic independence. Recent analysis of women survivors and long-term monitoring of the State's response<sup>66</sup> shows that women survivors are often unable to compensate for the financial losses caused by domestic violence, including loss of employment, health costs and housing expenses. Also, limited financial capacity prevents survivors from resolving their legal problems, as court costs and advance payments for expert assessments remain significant barriers to access to justice, while existing exemptions and free legal aid mechanisms are complex, narrowly applied and rarely used.<sup>67</sup> Finally, child support is often inadequate, irregular and poorly enforced.<sup>68</sup>

## 5. DEVELOPMENTS ON MINORITY RIGHTS, REFUGEES AND ASYLUM SEEKERS

The environment for civil society in North Macedonia has become increasingly challenging over the past year, with growing pressures on organisations working on gender equality, human rights and democratic governance<sup>69</sup>. Civil society organisations report increased shrinking civic space, reduced

transparency in decision-making processes and limited opportunities for meaningful consultation. Policy processes are often conducted through expedited procedures or with limited access to draft documents, reducing the possibility for substantive engagement by civil society.

65 [Summary Analysis for Total Crime 2010–2025](#), (available only in Macedonian), Ministry of Interior (2025).

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

67 [The Influence of Court Fees and Costs – Barriers or Opportunities for Women Survivors](#), ESE, (2025)

68 [Does Child Alimony Satisfies Children's Needs](#), ESE, (2025)

69 [The Missing Lens: Rethinking the Enabling Environment for Gender Equality and Civil Society in the Western Balkans](#), Balkan Civil Society Development Network (2025).

The anti-gender narratives and politics has further compounded the situation. Organised anti-rights groups have increasingly mobilised to influence legislative and policy processes, particularly in the education sector. Their activities have targeted initiatives such as the draft National Education Strategy and draft National Strategy on prevention and protection against GBV against women and domestic violence. Using available legal and participatory mechanisms, such as submitting formal comments, mobilising parents through social media platforms, and sustaining campaigns against gender-related issues, these groups continue to contribute to the politicisation and stigmatisation of gender equality. Women's rights and LGBTQI organisations have also reported ongoing digital violence, disinformation campaigns, and public attacks against activists, creating a normalisation of intimidation that discourages participation in public debate.

Another important development concerns the reinstatement of the Government Council for Cooperation with Civil Society, which in principle

should serve as a key institutional mechanism for dialogue between public authorities and civil society organisations. While the reactivation of the Council represents a positive formal step, its practical impact on improving civic participation and consultation remains limited so far.

In parallel, consultations related to the Reform Agenda under the EU Growth Plan illustrate persistent shortcomings in participatory policymaking. Although authorities reported that consultations were conducted with civil society and other stakeholders, independent monitoring indicates that these discussions were brief, largely informational, and held at a late stage of the process, without sufficient access to draft texts or clear evidence of how civil society input was incorporated. As a result, civil society organisations – particularly women's rights organisations – were not systematically engaged as strategic partners in shaping or monitoring the Reform Agenda, raising concerns about the depth of democratic scrutiny and the inclusiveness of EU-related reform processes.

## 6. DEVELOPMENTS ON ENVIRONMENT FOR CIVIL SOCIETY AND CONSULTATIONS

Developments in social policy and employment affecting women and LGBTQI persons in North Macedonia remain marked by persistent structural inequalities and limited progress in aligning national legislation with EU standards under Chapter 19 (Social Policy and Employment). National statistics consistently show that women's employment and activity rates remain substantially lower than those of men, while women are overrepresented in unpaid care work and informal economic activities. These disparities reflect longstanding barriers related to care responsibilities, limited access to childcare services and labour-market segmentation. They also contribute to gender gaps in earnings, pensions and economic security.

At the same time, the country has yet to fully align with key EU directives relevant to labour equality, including the Work-Life Balance Directive, Pay Transparency Directive and Women on Boards Directive, which limits progress toward addressing structural gender inequalities in the labour market. Ongoing revisions of the Labour Law and the Law

on Protection against Harassment at the Workplace remain marked by unclear timelines, limited transparency and opaque selection of working group members. The working group for the Law on Protection against Harassment at the Workplace is operational but the outcomes are fully dependent on the Labour Law, as a *lex specialis* directly related to this law.

In addition, the legislative and policy environment addressing workplace discrimination, harassment and equal opportunities remains incomplete. The proposed Law on Gender Equality, which could lay the foundations for strengthening institutional mechanisms and accountability remains stalled. LGBTQI persons face additional barriers to accessing formal employment, including discrimination, stigma and limited enforcement of anti-discrimination protections, despite the legal framework recognising sexual orientation and gender identity as protected grounds. Anti-gender narratives increasingly shape policy debates, including on strengthening labour rights and equality protections at diverse levels.<sup>70</sup>

<sup>70</sup> Gender Analysis of European Commission Country Report for North Macedonia, REACTOR, (2026).

## 7. DEVELOPMENTS ON SOCIAL POLICY AND EMPLOYMENT CONCERNING WOMEN AND OTHER GROUPS

North Macedonia has continued implementation of UNSCR 1325 through its Second National Action Plan (NAP) 2020–2025. However, the NAP remains narrow and largely security-sector focused, with limited public evidence of a broader, whole-of-government approach to women's participation in dialogue, peacebuilding and prevention, limiting the scope of the Women, Peace and Security agenda.

According to REACTOR's analysis<sup>71</sup>, the most visible progress has been in the defence sector, especially in promoting women's participation in security institutions and integrating a gender perspective into training and institutional processes.<sup>72</sup> Shadow monitoring shows substantial

implementation of activities under the gender equality strategy related to "women, peace and security", including seminars, public campaigns, outreach to encourage girls' education for careers in peace and security, and measures to ensure more balanced participation in defence training. Women's representation in the Army rose from 10.8% in 2020 to 11.99% in 2024, and women made up 48% of Ministry of Defence staff the same year, with women in leadership category B positions increasing from 48% to 54% over the same period.<sup>73</sup> Still, the reports emphasise the need for sustainable change, including stronger institutional support, continued awareness-raising, and more systematic monitoring.

## 8. DEVELOPMENTS ON WOMEN, PEACE AND SECURITY ISSUES AND RESOLUTION OF ONGOING CONFLICTS

In 2025, the same barriers in women's access to reproductive health services persisted as in previous years. There continues to be an insufficient number of primary gynaecologists, and their territorial distribution remains inadequate. Women continue to report unlawful charging by primary gynaecologists for services that should be free of charge under the regulations of the Health Insurance Fund (HIF). In 2025, inspections conducted by the HIF and the Public Revenue Office found irregularities in 23 out of 49 inspected gynaecological practices, including charging for services that should be free and failure to issue fiscal receipts. Such practices represent a serious financial barrier to accessing gynaecological and obstetric healthcare, particularly for women from rural areas, Roma women and other vulnerable groups.

The implementation of the cervical cancer screening programme also remains problematic. In 2025, the Ministry of Health continued the practice of non-transparent planning, as the programme does not specify the number of women to be covered by screening and success indicators remain narrative rather than quantified. HPV testing has still not been introduced as a replacement for PAP testing despite being a more accurate method for early detection. Monitoring shows that screening coverage declined in 2024 to 50,346 women, representing only 10% of the target population and a 22% decrease compared to 2023, which is far below the 75% coverage required for effective screening.

Services intended for vulnerable women remain limited in scope and accessibility, particularly for

71 Ibid.

72 [Shadow Report on the implementation of Gender Equality Strategy](#), REACTOR, (2025).

73 Ibid.

women in rural areas and other marginalised groups.<sup>74</sup> Access to safe drinking water also remains a critical public health issue. In many rural areas, drinking water quality is not regularly monitored and local water supply systems often lack adequate treatment, disinfection

and professional management. Evidence shows frequent microbiological contamination in rural water systems and wells, posing significant health risks. Limited sanitary inspections and monitoring further compromise drinking water safety<sup>75</sup>.

## Recommendations for the 2026 Country Report

1. Call for strengthening the enabling environment, safety and security for CSOs and HRDs by tackling and processing cases of misinformation, hate speech and attacks against activists, including technology-facilitated gender-based violence, ensuring protection of CSOs/HRDs and journalists
2. Recommend authorities to ensure the independence, transparency and merit-based appointment of members of independent human rights institutions, including the Commission for Prevention and Protection against Discrimination (CPPD) and the Ombudsman, while guaranteeing adequate financial and human resources to enable their effective and independent functioning, in line with national legislation and international standards.
3. Recommend the adoption of the long-delayed legislation related to gender equality, including the Law on Gender Equality, the new Labour Law and the Law on Protection against Harassment at the Workplace, in line with EU acquis and international standards and in consultation with women's rights and feminist organisations.
4. Recommend urgent amendments to the Electoral Code to introduce quotas where absent, move toward 50–50 gender parity in elected and appointed bodies, and strengthen accountability of political parties for women's representation, especially at local level and in executive positions.
5. Recommend systematic implementation of the National Gender Equality Strategy and related action plans, including allocation of adequate financial resources, monitoring mechanisms and institutional accountability.
6. Recommend the effective implementation of the existing Law on the Prevention and Protection from VAW and Domestic Violence and the forthcoming National Strategy and the first Action Plan (2026–2029), through adequate budgeting and human resources, while prioritizing strengthening the National Coordinative Body, improving data collection and monitoring systems, ensuring that the police and Centres for Social Work have adequate resources to effectively implement their mandate
7. Recommend authorities to improve access to justice for women survivors of domestic violence, through resolution of their existential economic needs: economic empowerment and employment; legally guaranteed secondary legal aid in all procedures; financial support in the transition period of 12 months after the divorce or separation; effective enforcement of child support.
8. Ensure equitable access to reproductive health services by increasing the number and improving the territorial distribution of primary gynaecologists, while strengthening oversight to prevent unlawful charging for services covered by the Health Insurance Fund.
9. Improve the effectiveness and transparency of preventive health programmes, particularly cervical cancer screening, by introducing HPV testing, setting clear coverage targets and indicators, and ensuring adequate implementation and monitoring of services for women from rural areas and other vulnerable groups.
10. Ensure equal access to safe drinking water and wastewater infrastructure in rural areas, by prioritizing investments in rural water supply systems, strengthening monitoring of drinking water quality and improving sanitation infrastructure in line with EU Water Directives, Water Resilience Strategy and Waste Water Directive.

74 [Preventive health programs under scrutiny. How to achieve better results?](#) (available only in Macedonian) Association ESE, 2025.

75 [Report on the status, quality and safety of drinking water in RNM](#), IPH – Institute of Public Health, (2025).



SERBIA

# 1. INTRODUCTION

Student protests, initially sparked by demands for the prosecution of those responsible for the collapse of the railway station canopy in Novi Sad in November 2024, which resulted in 16 fatalities, have evolved to include calls for early elections. The state response has been characterised by intensified repression targeting students, activists, educators, cultural workers, independent media outlets, and journalists, as well as all individuals who expressed support for the demonstrations. In this political climate, key areas – including the rule of law, fundamental rights, and the fight against corruption and organised crime – are experiencing either stagnation or regression.

In an atmosphere of eroding rule of law and democratic processes, legislation is increasingly being passed via expedited procedures without public consultation, thanks to the amendment of the Rules of Procedure of the Government of the Republic of Serbia. A case in point is the recent adoption of a set of controversial amendments to key judicial laws proposed by a member of the ruling party<sup>76</sup>. Furthermore, independent oversight bodies, such as the Ombudsman, are failing to protect citizens from executive overreach. Instead, they are facilitating the suppression of freedom of expression by proposing amendments to the Law on Public Order and Peace,

which would extend the definition of ‘public space’ to include online platforms. The announced acceleration of the adoption of laws and strategic documents risks undermining their quality<sup>77</sup>.

In an election year, the appointment of all members of the Regulatory Body for Electronic Media (REM) remains incomplete. Furthermore, key leadership positions within police departments have been replaced by less qualified individuals, raising concerns over political appointments based on loyalty to the ruling party. Political pressure on the judiciary is intensifying, including pressure on prosecutors during the elections for the High Prosecutorial Council. Reports have surfaced indicating that certain prosecutors were interrogated by the Security Intelligence Agency (BIA). Despite the initial elections for the High Prosecutorial Council being held as early as December 2025, the electoral process remains unfinished due to formal complaints and systematic interference.

On Sunday 29 March, local elections took place in 10 Serbian municipalities in a crucial vote after the 2-years long student protests. Student-led opposition, which had put forward candidates in all 10 municipalities recorded cases of violence at polling stations.

# 2. WOMEN’S POLITICAL PARTICIPATION

In the National Assembly, women make up 38% of MPs, while in the Government 9 out of 30 members are women. At the local level, however, women serve as mayors or heads of municipalities in only 13.3% of cases. In the Special Report on Discrimination Against Women, the Commissioner for the Protection of Equality cites statements by women politicians noting that “*women in politics are*

*often perceived as decoration,*” highlighting that sexist attitudes toward women in politics remain present in public discourse<sup>78</sup>.

Women played a prominent role in the protests and were disproportionately exposed to violence, intimidation, and targeted attacks<sup>79</sup>. There has been no adequate response from competent authorities to

76 See [article](#), European Western Balkans website, accessed on 22 April 2026.

77 This is the task of the newly established Operational Team for Serbia’s EU accession, led by the Head of the Mission of Serbia to the EU in Brussels; the plan is to secure funding under the EU Growth Plan and Reform Agenda for the Western Balkans.

78 Commissioner for the Protection of Equality, Special Reports: <https://ravnopravnost.gov.rs/posebni-izvestaji/>

79 [Women’s Rights in Western Balkans 2025](#), page 66, Kvinna till Kvinna (2025)

violence against female students, opposition women politicians, women candidates in local elections, or to the misuse of women in public institutions for political purposes. Women participating in the protests report experiences of verbal, online, and physical

violence, as well as sexual violence and threats, often accompanied by sexist insults and humiliation. Media coverage of women participating in the protests was also inadequate, demonstrating the continued difficulty in accepting their equal public role<sup>80</sup>.

### 3. DEVELOPMENTS ON GENDER EQUALITY, ANTI-DISCRIMINATION AND LGBTQI RIGHTS

There has been no progress in implementing recommendations from international bodies and the EU regarding anti-discrimination policies. The Anti-Discrimination Strategy has not been consistently implemented, and there has been no effective systemic response to widespread hate speech, xenophobia, racism, and increasing political and religious discrimination. There are no reports on the implementation of the Action Plan for the Anti-Discrimination Strategy for 2024 and 2025 on the website of the competent ministry. During the public consultations on the Action Plan for 2026–2027, no comments were submitted by the interested public.

Similarly, there is no report on consultations regarding the revision of the Gender Equality Strategy for 2026–2027, nor information on whether a corresponding Action Plan has been developed. There is also no report on the implementation of the Gender Equality Action Plan for 2024. It has been almost two years since the Constitutional Court temporarily suspended the Law on Gender Equality until the end of the proceedings. The

suspension is leading to legal uncertainty and is severely undermining progress on gender equality in Serbia. Since the Constitutional Court does not have deadlines for acting in such cases, the suspension could last for several years.

The Gender Equality Committee of the National Assembly has not convened since 1 June 2025, preventing discussion of the Commissioner's report and follow-up on its recommendations. The Government's Coordination Body for Gender Equality held a constitutive meeting in January 2026 after being inactive since 2023, but the official announcement contains only minimal information and no activity plan.

At the end of the year, a new Commissioner for the Protection of Equality (a candidate of the ruling coalition) was elected. His statements regarding discrimination and violence have remained neutral and restrained, and human rights civil society organisations (CSOs), including members of the National Convention on the European Union 23 coalition, declined a meeting with him.

## 4. GENDER-BASED VIOLENCE, INCLUDING DIFFERENT FORMS OF VIOLENCE (DOMESTIC VIOLENCE, SRSV, FORCED MARRIAGES, ON-LINE VIOLENCE AND TRAFFICKING IN HUMAN BEINGS ETC.)

Violence against women continues to remain a matter of concern. There is no information that the competent authorities plan to align national legislation with the EU Directive on combating violence against women and domestic violence (2024/1385).

The first thematic GREVIO evaluation report<sup>81</sup> contains a number of urgent recommendations, as in many areas there has been no significant progress compared to the Baseline Report (2020)<sup>82</sup>. GREVIO points to several worrying trends: the growing anti-gender narrative and its impact on violence against women; the shrinking space for women's rights organisations; an epidemic of digital violence without an adequate systemic response; and persistent structural barriers faced by Roma women as a result of their systemic discrimination.

The Strategy for the Prevention and Combating of Gender-Based Violence against Women and Domestic Violence (2021–2025) never became operational, as the necessary action plans for its implementation were not adopted. The duration of the Strategy has been extended until the end of 2027, while no action plan has been adopted for 2026. The recording and monitoring of all forms of GBV (including femicide) have still not been improved in accordance with the provisions of Article 11 of the Istanbul Convention. Insufficient resources hinder the effective provision of both general and specialised support services. Services provided by specialised women's organisations lack systematic support from public budgets. At the same time, licensed service providers face additional requirements (such as inclusion in the SOZIS information system), which require additional financial and human resources.

The revision of the Criminal Code and the Criminal Procedure Code were halted after the public consultation process due to numerous comments from CSOs regarding newly proposed criminal offences, including provisions that would undermine victims' rights. At the initiative of the Autonomous Women's Center and under public pressure, a proposal was adopted to criminalise the non-consensual sharing of intimate images as a new criminal offence. Also under public pressure, the Ministry of Justice withdrew its proposal to introduce a separate criminal offense of „sexual intercourse without consent“ and announced changes to the criminal offense of rape (lack of consent as the first paragraph of the offense of rape).

The Programme for Combating Trafficking in Human Beings in the Republic of Serbia for the period 2024–2029, together with the Action Plan for its implementation for 2024–2026, remains in force. The establishment of a working group to draft a new Action Plan is expected. However, it is evident that the previous plan was not developed on the basis of actual needs for combating trafficking in human beings and providing support to victims and vulnerable groups but to use already allocated donor funding for activities implemented by the institutions of the Republic of Serbia and presented as joint activities in the fight against trafficking in human beings<sup>83</sup>. Also, public policies are increasingly focused on addressing labour exploitation but trafficking of women and girls for the purpose of sexual exploitation is being entirely neglected.

CSOs supported by donors are the only service providers for victims of human trafficking who are mainly coming from socially marginalised groups.

81 [First Thematic Evaluation Report Serbia](#), GREVIO (2025).

82 [Baseline Evaluation Report Serbia](#), GREVIO (January 2020).

83 [Alarm Report on Progress of Serbia in Cluster 1](#), PrEUgovor, (May 2025).

Based on the publicly available report on the material and financial operations of the Centre for Human Trafficking Victims' Protection for 2024<sup>84</sup>, the Centre's funding is provided exclusively from the budget of the Republic of Serbia, in the total amount of

48,047,000 RSD (approximately 410,000 EUR), out of which a staggering 76.5% of the total budget is spent on salaries and personal income and only 5.5% is allocated to direct support for victims of human trafficking, predominantly for shelter-related costs.

## 5. DEVELOPMENTS ON MINORITY RIGHTS, REFUGEES AND ASYLUM SEEKERS

Despite the adoption of strategic documents aimed at improving the situation of Roma in Serbia<sup>85</sup>, their implementation remains elusive and Roma communities continue to face systemic discrimination, social exclusion and significant barriers in accessing basic rights and public services. CSOs, including A 11 Initiative for Economic and Social Rights, continue to document structural inequalities affecting Roma communities, particularly in the areas of housing, access to personal documents, social protection and employment.<sup>86</sup> Roma women are particularly affected by intersecting forms of discrimination and poverty, which significantly restricts their access to education, employment and healthcare. Socio-economic indicators confirm the structural marginalisation of Roma communities.<sup>87</sup>

Housing conditions remain one of the most pressing human rights concerns affecting Roma communities. Many Roma families live in informal settlements lacking secure tenure and access to basic infrastructure. Roma communities continue to face the risk of unlawful forced evictions linked to infrastructure or urban development projects.

These evictions are frequently carried out without meaningful consultation with affected communities, adequate notice, or the provision of sustainable alternative housing solutions, raising concerns about Serbia's compliance with international human rights standards on the right to adequate housing.

Discriminatory public discourse by high-level public officials is further compounding the situation. In 2025, A11 Initiative, together with Roma CSOs, filed a complaint before the Commissioner for Protection of Equality against the Minister for Human and Minority Rights and Social Dialogue, Demo Beriša, following his public statement suggesting that Roma "must understand that the state and local authorities are not bank machines." The Commissioner later concluded that the minister's statement constituted discrimination against Roma and recommended that he issue a public apology. Such rhetoric by senior public officials contributes to the stigmatisation of Roma communities and reinforces harmful stereotypes, undermining efforts aimed at combating anti-gypsyism.

84 [Report on Material and Financial Operations for 2024](#), Center for protection of victims of trafficking, (March 2025).

85 [Strategy for Social Inclusion of Roma and Roma Women in the Republic of Serbia \(2022–2030\) and Strategy for Prevention and Protection against Discrimination \(2022–2030\)](#).

86 [A system adverse to the poor – Report on Economic and Social Rights in Serbia, A11 – Initiative for Economic and Social Rights \(2024\) and Unaffordability of Social Housing in Belgrade: From the Burden of Housing Costs to Spatial Segregation, A 11 – Initiative for Economic and Social Rights, \(2025\)](#).

87 [Trapped by Automation: Poverty and Discrimination in Serbia's Welfare State](#), Amnesty International (2023).

## 6. DEVELOPMENTS ON ENVIRONMENT FOR CIVIL SOCIETY AND CONSULTATIONS

Space for CSOs continued to shrink over the reporting period. The European Parliament in its resolution<sup>88</sup> strongly condemns Serbia's deteriorating human rights situation, including a pattern of repression marked by illegal surveillance, intimidation, and arbitrary detention of activists, journalists, students, and protesters, many of whom are engaged in defending democracy and women's rights. As a result, several non-governmental organisations, including the National Convention on the European Union (NCEU), have maintained their decision to suspend cooperation with state authorities and participation in government-established bodies until the human rights situation for activists improves.

In addition to the daily attacks and the diversion of public funds through the creation of phantom CSOs by the ruling party and its coalition partners – practices repeatedly documented by investigative journalists – there are also more sophisticated forms of obstructing the work of CSOs. CSOs that provide services to the most vulnerable groups are required to undergo demanding licensing procedures, yet these services are subsequently not financed from the state budget. Furthermore, obstruction has been observed within the licensing process itself, including administrative silence lasting more than three years.

A worrying development in the reporting period concerns the amendments to the Rules of Procedure of the Government of the Republic of Serbia. These changes allow the Government, upon the proposal of an "authorised proposer"<sup>89</sup> to bypass the mandatory public consultation process for specific legislation. This undemocratic mechanism was notably applied during the adoption of amendments to judicial laws, undermining transparency and inclusive law-making.

The shrinking space for civil society extends beyond attacks on protesters, pointing to ongoing patterns of restriction. Throughout the reporting period, numerous cases arose where personal data of activists had been published in tabloids<sup>90</sup>. Women and LGBTQI+ defenders are especially vulnerable, often being subjected to misogynistic, sexualised, and discriminatory rhetoric. Serbia's authoritarian turn has had a disproportionate impact on women and girls, who face heightened exposure to violence, harassment, and discrimination amid the rollback of legal protections. Particularly troubling is the public disclosure of personal data and the proliferation of hate speech targeting women and minorities, which together deepen insecurity and reinforce gender-based inequalities in Serbia's already shrinking civic space.<sup>91</sup>

## 7. DEVELOPMENTS ON SOCIAL POLICY AND EMPLOYMENT CONCERNING WOMEN AND OTHER GROUPS

In 2025, discussions on long-announced amendments to the Labour Law and related labour legislation continued, but the reform process has been significantly delayed. Although the need to harmonise labour legislation and

strengthen protections for workers has been repeatedly highlighted in EC reports and policy discussions, concrete legislative reforms addressing precarious work, discrimination in employment and enforcement of labour rights remain limited.

88 [Resolution of 7 May 2025 on the 2023 and 2024 Commission Reports on Serbia \(2025/2022\(INI\)\)](#), European Parliament, (2025).

89 Authorised are: 1) The Government (or any ministry); The President of the Republic; 3) The National Assembly as a whole; 4) A parliamentary committee; 5) An individual deputy or parliamentary group; 6) The Supreme Court of Cassation; 6) The Prosecutor's Office; 7) A court of law; 8) A local self-government unit (municipality, city, or autonomous province); 9) A citizen initiative that has gathered at least 40,000 signatures.

90 [Civic Space Report 2024 – Western Balkans](#), Balkan Civil Society Development Network, (2025).

91 [WAVE Statement on the Escalating Repression in Serbia](#), Women Against Violence Europe – WAVE, (2025).

The lack of progress in reforming labour legislation continues to disproportionately affect workers in insecure forms of employment and women working in low-paid sectors.

Women from marginalised communities, particularly Roma women, remain among the most disadvantaged groups in the labour market. According to available data, the employment rate of Roma women in Serbia remains significantly lower than that of the general population, with a large proportion of Roma women either unemployed or economically inactive. Structural discrimination, lower levels of formal education and limited access

to stable employment opportunities contribute to their economic exclusion.

At the same time, labour rights concerns remain visible in sectors with a predominantly female workforce. In 2025, the non-renewal of employment contracts for approximately 1,500 teachers at the beginning of the school year raised concerns about the widespread use of temporary contracts and job insecurity in the education sector. Such practices contribute to precarious employment and disproportionately affect women, who represent the majority of employees in education and other public service sectors.

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## 8. DEVELOPMENTS ON WOMEN, PEACE AND SECURITY ISSUES AND RESOLUTION OF ONGOING CONFLICTS

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Negotiations between Serbia and Kosovo remain stalled, with limited publicly available information and a significant amount of propaganda surrounding the process. Women's organisations are not included in the official negotiations. Exchange and cooperation between women's rights activists of the two sides continues to take place mainly thanks to foreign donor organisations. Recently, with the support of the OSCE, Network 1325, an organisation gathering women's and other groups dealing with this topic, was renewed.

The National Action Plan on UNSCR 1325 was adopted without public consultation, and proposals submitted by women's organisations regarding victims of conflict-related sexual violence continue to be consistently ignored, as well as the issue of the participation of women in the normalisation of relations between Kosovo and Serbia. A year after the adoption of the Plan, there is still no official report on its implementation.

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## 9. DEVELOPMENTS ON CONSUMER AND HEALTH PROTECTION

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The working group of the Ministry of Health produced the first National Guide for Pregnancy and Childbirth, which refers to the health care of women during pregnancy, natural childbirth and the use of ultrasound in pregnancy. The guide is not mandatory, and there is no data on whether it is applied in practice. The availability of health care in smaller cities is a big problem, which is reflected in the insufficient number of doctors, the inaccessibility of gynaecological examinations for women with disabilities, elderly women, the lack of conditions for the field work of patronage services, which are important for the care of mothers and newborns, as well as the elderly and people with disabilities. For the

first time in Serbia, a court case is being conducted against a gynaecologist accused of obstetric violence against two women during childbirth; in both cases, the babies died.

There is also a worrying trend of low response to immunisation against human papillomavirus (HPV), as only 8.5% of children and young people aged nine to 19 received the first dose of the vaccine. This confirms the need for greater mobilisation of the health system and the entire community in preventive activities, especially bearing in mind that in Serbia every year more than 700 women die from cervical cancer, although this can be prevented by immunisation.

## Recommendations for the 2026 Country Report

1. Call on Serbia to cease all forms of repression and interference with the rights to freedom of peaceful assembly and expression, which are key conditions for EU accession. Urge authorities to halt disproportionate use of force, ensure prompt and independent investigations into police misconduct and attacks on protesters, and end smear campaigns and other forms of pressure against activists and civil society.
2. Urge Serbia to restore the independence and effectiveness of the judiciary by withdrawing or revising the recently adopted judicial laws and aligning them with European standards, following meaningful public consultation.
3. Urge authorities to lift the suspension of the Gender Equality Law, and move forward in further aligning legislation with the EU *Acquis* and international conventions; call for the adoption of the stalled Draft Law on Same Sex Partnership
4. Recommend authorities to adopt outstanding action plans and the protection of rights of LGBTQI persons and minorities and adequate budget for their implementation, full implementation of Law and Strategy on Non-discrimination and implementation of hate crime legislation.
5. Recommend that the Government and the competent ministries give due consideration to the First Thematic GREVIO Evaluation Report for Serbia and incorporate all priority recommendations into the relevant laws and action plans for the prevention and combating of gender-based violence.
6. Recommend authorities to reform social protection policies to better reflect the socio-economic realities of marginalised communities, including Roma, by increasing the adequacy of social assistance benefits to ensure a dignified standard of living and by guaranteeing broader and more effective access to social rights.
7. Continue to acknowledge the role of women's rights organisations, who are increasingly under attack, in providing intersectional support to victims/survivors of gender-based violence, advocating for legal and policy changes to improve the situation of women and girls and reaching those from minority communities or vulnerable groups
8. Recommend authorities to harmonise the legal framework with the EU *Acquis*, including the Work-Life Balance Directive and prioritise the adoption and effective implementation of comprehensive labour law reforms aimed at strengthening protection of labour rights, addresses discrimination, job insecurity and the socio-economic exclusion of women and other vulnerable groups.
9. Monitor the implementation of the third NAP on UNSCR 1325 in Chapter 31 (Foreign, Security and Defence Policy) and the participation of women CSOs in its activities; ensure a gender perspective in the section on Normalisation of Relations between Serbia and Kosovo.
10. Closely monitor and push for the adoption of the draft Law on Prevention and Suppression of Human Trafficking; Ensure that the future action plans on human trafficking are based on real needs in prevention, victim identification and protection, with clear institutional responsibilities and adequate allocations from the state budget



# UKRAINE

# 1. INTRODUCTION

Ukraine's EU accession process has continued to advance during the reporting period despite the ongoing war, with the country demonstrating remarkable institutional resilience. The EC completed the screening process for all chapters of the *acquis Communautaire* (EU *acquis*) in September 2025 and by March 2026 all negotiating chapters were technically opened until the political conditions allow the opening of the formal negotiation process.<sup>92</sup> Ukraine has adopted Roadmaps on the rule of law, public administration, and democratic institutions – key deliverables under Cluster 1.

On 1 April 2026, the Cabinet of Ministers of Ukraine adopted Resolution No. 438 approving the National Programme for the Alignment of Ukrainian Legislation with EU Law<sup>93</sup> – a key instrument of Ukraine's EU accession process establishing a

framework for systematic implementation of reforms aligned with the EU's *acquis*.

The wartime context continues to shape both the opportunities and constraints for reform. Martial law restricts electoral activity, limits parliamentary oversight, and diverts national resources toward defence – creating structural pressures that slow legislative progress and deepen pre-existing inequalities, particularly for women and marginalised groups. Energy blackouts throughout the winter have also exacerbated security concerns, especially for women and the most marginalised groups. At the same time, the war has intensified international scrutiny of Ukraine's human rights commitments, with the EU and Council of Europe increasingly linking reconstruction funding and accession milestones to concrete legislative outcomes on gender equality, non-discrimination, and civil society freedoms.

# 2. WOMEN'S POLITICAL PARTICIPATION

In May 2025, the Cabinet of Ministers approved an operational plan for 2025–2027 implementing the State Strategy for Ensuring Equal Rights and Opportunities for Women and Men until 2030. One objective is the effective functioning of the national gender equality mechanism across all levels of decision-making for Ukraine's recovery. Despite this, women remain underrepresented at the highest levels of government, with no significant progress recorded during the reporting period. Women still hold only about 21% of seats in parliament, with just 5 women in the 21-member Cabinet of Ministers, making most of the political decision-making in Ukraine heavily male-dominated.

While over 95% of citizens support equal voting rights<sup>94</sup>, political parties have failed to

institutionalise inclusion<sup>95</sup> within their internal structures.

Women with disabilities face intersecting forms of discrimination that further limit their political participation. Healthcare facilities and administrative buildings do not generally comply with inclusivity standards, limiting access to key decision-making spaces. The absence of properly regulated ramps, sign language interpretation, and Easy-to-Read materials in government hubs effectively disenfranchises women with disabilities from the very consultations intended to address their rights. A further systemic concern is the guardianship model: under current legislation, courts may declare an individual „legally incapable,“ automatically stripping women with intellectual or psychosocial disabilities of their right to vote.

92 So far, Hungary's veto has blocked the formal opening of the negotiation process.

93 Government approved the National Programme for the Adaptation of Ukrainian Legislation to EU Law, Service of the Deputy Prime Minister of Ukraine, 3 April 2026

94 Play-off of the Electoral League: The State vs. People with Disabilities, p. 5, NGO „Fight for Right“ (2019).

95 Social Cohesion in Ukraine: Challenges and Barriers for Vulnerable Groups. OPORA (2025).

### 3. DEVELOPMENTS ON GENDER EQUALITY, ANTI-DISCRIMINATION AND LGBTQI RIGHTS (CHAPTER 23)

Ukraine's existing legal framework on equal rights and anti-discrimination is not fully in line with the EU *acquis*. Ukraine's Rule of Law Roadmap includes a dedicated Section 3.11 on LGBTQI discrimination, requiring amendments to the Anti-discrimination Law, criminal and administrative legislation on hate crime and hate speech, and the development of a registered civil partnership bill.

On 25 February 2026, a ruling of the Ukrainian Supreme Court confirmed that a same-sex couple could be legally recognised on the basis of cohabitation and shared family life, in the absence of marriage equality or registered partnership. However, while the newly registered draft Civil Code<sup>96</sup> provides a framework for civil partnerships, it simultaneously undermines progress achieved in terms of LGBTQI rights. The draft Civil Code defines marriage exclusively as a union between a woman and a man, excluding same-sex couples and leaving children of

such unions without legal protection from one parent. Also, article 1495 provides that a change of gender marker by one spouse may render the marriage invalid, threatening existing family relationships for transgender people without clear safeguards.

The anti-discrimination framework in Ukraine remains fragmented and inconsistent, lacking a definition of multiple discrimination and omitting sexual orientation and gender identity as protected grounds. Draft Law No. 13597 (registered August 2025) aims to address these gaps by adding both grounds to protected categories, introducing administrative liability for discrimination, and updating Article 161 of the Criminal Code in line with EU requirements. However, human rights experts caution that the bill does not provide full protection – some vulnerable groups and forms of discriminatory harm may remain insufficiently covered – and further revision is needed for it to have systemic effect.

### 4. GENDER-BASED VIOLENCE, INCLUDING DIFFERENT FORMS OF VIOLENCE (DOMESTIC VIOLENCE, SRSV, FORCED MARRIAGES, ON-LINE VIOLENCE AND TRAFFICKING IN HUMAN BEINGS ETC.)

Ukrainian legislation on combating violence against women and domestic violence is not yet fully in line with the Istanbul Convention and with the EU *acquis*. The absence of „violence against women“ as a distinct legal concept obscures its structural and gender-based nature, while the lack of „intersectional discrimination“ recognition prevents adequate protection for women facing compounded forms of discrimination. Furthermore, the Criminal Code does not criminalise any of the four main cyber violence

forms specified in the EU Directive on Combating Violence against Women and Domestic Violence: non-consensual sharing of intimate or manipulated materials, cyber stalking, cyber harassment, or cyber incitement to violence or hatred.

Gender-based violence, already high before the war,<sup>97</sup> has surged 36% since its outbreak. A 2025 UNFPA report<sup>98</sup> based on discussions with over 300 women found that heightened domestic violence is driven by

96 [Proposed new Civil Code will distance Ukraine from EU Accession](#), ILGA Europe, (2026).

97 [Three years of full-scale war in Ukraine roll back decades of progress for women's rights, safety and economic opportunities](#), UN Women, (2025).

98 [Voices from Ukraine Report: Assessment Findings and Recommendations](#), UNFPA Ukraine, (2025)

increased stress, aggression, and substance abuse, with men returning from military service struggling with Post Traumatic Stress Disorder (PTSD) affecting their behaviour at home. Also, increased circulation of small arms and light weapons is severely exacerbating domestic and intimate partner violence, as those with arms at home use them to intimidate partners and family members. Official statistics confirm a steady upward trend in domestic violence by military personnel, with a frequent escalation from psychological to physical and sexual violence.

The absence of economic security and clear legal pathways continues to facilitate exploitation of women with disabilities. Recent reports from April 2026 reference marriages of convenience for illegal border crossings, highlighting how poverty and legislative loopholes enable men to exploit women's disability status.

The 2024 Law on the Legal and Social Protection of Persons Affected by Sexual Violence related to Russia's Armed Aggression against Ukraine, which entered into force in 2025, still lacks a comprehensive regulatory framework for implementation and is effectively not being enforced. Resources must be allocated for secondary legislation and bylaws, designation of responsible institutions, and development of accessible reparation mechanisms for survivors. The legal framework also remains disability-blind, failing to address reproductive

coercion or the withholding of assistive devices for women with disabilities.

On the rights of survivors/victims of crime, Ukraine committed to ensuring the effective implementation and observance of the rights of survivors, in particular the standards of the EU Victims Rights Directive by 2027. In 2025, a multi-stakeholder working group was established to align the Criminal Procedure Code with EU standards and best international practices. The group has been working on the development of the draft law on "On Amendments to the Criminal Procedure Code of Ukraine Regarding the Protection of the Rights of Victims of Criminal Offenses".<sup>99</sup>

Official GBV statistics are incomplete, as GBV remains largely under-reported, particularly for under-represented groups including Roma women, queer and trans women, and women with disabilities. Survivors' trust in local government institutions remains low, constituting a serious obstacle to support and access to justice.

Local civil society organisations are the primary service providers for GBV survivors in the absence of effective state-level support. Cooperation with women's CSOs with relevant expertise, and ongoing systematic training for service providers, investigators, prosecutors, judges, and lawyers in survivor-centred, trauma-informed approaches, are essential for effective implementation of existing legislation.

## 5. DEVELOPMENTS ON MINORITY RIGHTS, REFUGEES AND ASYLUM SEEKERS

Roma women remain among the most acutely at-risk ethnic minority groups in Ukraine, with long-standing structural problems amplified by the war and compounded by multiple layers of discrimination and marginalisation.<sup>100</sup> In February 2026, the ERGO Network highlighted that Roma inclusion in Ukraine's recovery is central to its human rights and EU membership commitments.<sup>101</sup>

The Transcarpathian Hungarian minority has been extensively instrumentalised ahead of Hungary's

April 2026 elections. While this instrumentalisation is well-documented, its gendered dimensions remain largely invisible in official discourse and policy, requiring additional scrutiny. Since February 2022, thousands of ethnic Hungarians living in Transcarpathia, especially young men crossing the border to avoid military service emigrated, largely to Hungary. This has skewed the demographic composition of the region, already economically challenged, toward older people and women, who continue to face multiple forms of insecurity.<sup>102</sup>

99 [Ukraine's EU integration: JurFem's recommendations on victims' rights, CRSV response system, modernisation of labour legislation](#), JurFem, (2025).

100 International Charitable Organisation Roma Women's Fund Chiricli, UN Women.

101 [Four years on: Ukraine's Roma are still fighting – for their country, and for recognition](#), ERGO Network.

102 [Minorities at War, Exodus of the Hungarian minority from Ukraine? War-induced ethnic dynamics in the Ukrainian-Hungarian border region](#), Eröss, Ágnes; Kovály, Katalin; Tátrai, Patrik in *Minorities at War*, Routledge (2024).

Ethnic Russian women in Ukraine face a uniquely difficult environment, as their identity is associated – by many Ukrainians and by Russian propaganda – with the aggressor state. Academic research<sup>103</sup> recently analysed how wartime appeals to unity and loyalty have blurred into securitisation processes depicting Russian speakers as potential security threats.

As of November 2025, over 4 million Ukrainians held temporary protection status in the EU, including 2.5 million women and girls, with Germany, Poland, and Czechia hosting the largest numbers. A recent study<sup>104</sup> found that 54% of Ukrainian refugee women in the EU had faced aggression and discrimination for speaking Ukrainian, 51% reported experiencing sexual harassment since the start of the war, only one in five said they could make ends meet easily, and one in three worked without a contract or under a contract not covering all their working hours. Refugee women in Hungary, Poland, and Slovakia report<sup>105</sup> barriers to accessing sexual and reproductive healthcare, social benefits, and GBV services, with many returning temporarily to Ukraine to access these – exposing themselves to additional safety risks.

Ukraine’s legal framework for national minorities and displaced populations – primarily the Law „On National Minorities (Communities)” – has undergone significant updates in 2025–2026 to align with EU standards. Resolution containing Certain Issues of Support for Internally Displaced Persons launched experimental projects providing long-term nursing care and contractual shelter services for low-mobility IDPs, including elderly women and women with disabilities. The Draft Law proposing amendments to the Law „On Ensuring the Rights and Freedoms of Internally Displaced Persons” would introduce a strict ban on forced eviction of IDPs from temporary stay facilities during martial law.

Despite these institutional steps, a profound implementation gap persists for women from ethnic minority and displaced groups, particularly those with disabilities. The 2025–2026 Regional Refugee Response Plan does not explicitly protect Roma women or displaced women with disabilities, who continue to face „triple discrimination” on grounds of gender, ethnicity, and disability.

## 6. DEVELOPMENTS ON ENVIRONMENT FOR CIVIL SOCIETY AND CONSULTATIONS

Ukraine maintains a broadly enabling legal framework for civil society, and the full-scale war has prompted a spike in civil society activity. Ukraine has developed formal mechanisms for CSO engagement in the EU accession process, with the EU-Ukraine Civil Society Platform (CSP)<sup>106</sup> serving as the primary structured dialogue mechanism. Productive cooperation between CSOs and government agencies – specifically the Office of the Prosecutor General and the Ministry of Internal Affairs – remains strong. However, further improvements are needed to ensure civil society’s input is meaningfully taken into account and that most marginalised groups have access to consultations, including through dedicated budgeting for transportation, security, and accessibility measures.

The updated 2025–2026 Action Plan for the National Strategy for Facilitating the Development of Civil Society<sup>107</sup> is reinforced by legislative advances in social procurement (social contracting), creating a formal mechanism for the state to fund specialised services such as inclusive care, accessible transport, and shelters. For women-led organisations in particular, this transition provides a vital legal pathway beyond precarious grant cycles toward becoming permanent, sustainable service providers within the state’s social protection infrastructure. This is particularly important as women-led organisations are projected to lose almost EUR 53 million by the end of the year due to global funding cuts to gender equality programmes, forcing them to halt lifesaving services to at least 63,000 women and girls.<sup>108</sup>

103 *Securitizing the Internal Other: Radical Right Narratives, Minority Rights, and Framing in Wartime Ukraine*, Dr. Vasilevich, Hanna. International Conference “Migration Dynamics and New Trends in European (In)Security,” Cluj-Napoca, October 23–24, 2025, 22 October 2025

104 *Seeking Safety from War: Violence and rights abuses against women from Ukraine*, European Union Agency for Fundamental Rights (2026)

105 *Women fleeing the war: Access to sexual and reproductive healthcare in the EU under the Temporary Protection Directive*, EIGE (2023).

106 *The EU-Ukraine Civil Society Platform*, European Economic and Social Committee (EESC).

107 *“On Approval of the National Strategy for Promoting the Development of Civil Society in Ukraine for 2021–2026”*, Cabinet of Ministers of Ukraine, Decree No 1161-r, (March 2025).

108 *Trapped by war, energy attacks and funding cuts: Women and girls in Ukraine face a deadly triple crisis*, UN Women, (February 2026)

## 7. DEVELOPMENTS ON SOCIAL POLICY AND EMPLOYMENT CONCERNING WOMEN AND OTHER GROUPS

The draft Labour Code, registered in January 2026 and submitted to parliament, opens the door to legally enshrining gender equality standards in the workplace – specifically on harassment prevention, equal pay, and work-life balance – in both the public and private sectors, taking into account the Equal Pay Directive and Equal Treatment Directive. While an important foundation for new gender policies, the draft is still at the second reading stage and may be amended.

Ukraine has significantly advanced its alignment with the EU disability *acquis* during the reporting period. The Law „On Amendments to Certain Legislative Acts of Ukraine Regarding Ensuring the Right of Persons with Disabilities to Work”, ensures funds are reinvested directly into workplace adaptation and employer subsidies. Failure to

provide reasonable accommodation is treated as a form of direct discrimination.

Effective implementation is also severely hindered by a critical lack of gender-disaggregated data on the employment of persons with disabilities. While the Pension Fund of Ukraine reported an aggregate 19.7% employment rate for persons with disabilities in January 2026,<sup>109</sup> this figure is not disaggregated by gender, sexual orientation, or disability type, nor does it track the success rates of reasonable accommodation measures. This statistical invisibility masks whether reforms effectively reach women with disabilities – who face systemic discrimination and glass ceiling effects compared to male counterparts – and leaves the legal framework blind to workplace harassment of LGBTQI persons.

## 8. DEVELOPMENTS ON WOMEN, PEACE AND SECURITY ISSUES AND RESOLUTION OF ONGOING CONFLICTS

In February 2026, Ukraine adopted a new National Action Plan (NAP) for the Implementation of UN Security Council Resolution 1325 for the period up to 2030, along with an implementation roadmap. The new NAP aligns with Ukraine’s Euro-Atlantic integration goals and the 2022 Framework of Cooperation with the UN on Preventing CRSV,<sup>110</sup> and envisages a comprehensive gender-sensitive security system and post-war reconstruction prioritising the diverse needs of all women. Its development has been described as a positive outcome of multi-stakeholder collaboration, led by the Ministry of Social Policy in engagement with diverse women’s rights organisations.

During the reporting period, diplomatic activity around a potential settlement of the conflict has been almost

entirely devoid of women’s meaningful participation. The Presidential Decrees of 15 May, 1 June, and July 2025 on Ukraine’s negotiating delegations confirmed that no women were included in any delegation – a clear structural exclusion from the highest levels of decision-making on sovereignty and security, despite active civil society advocacy for their inclusion. Several CSOs and the Government Commissioner for Gender Policy convened consultations drawing on a 10-Point Compact for Ukraine’s Just and Sustainable Peace,<sup>111</sup> which outlines civil society priorities and calls for a formal consultative mechanism of women’s civil society leaders to inform the negotiation team.

While women are increasingly active in humanitarian response, defence, early recovery,

<sup>109</sup> Data on the employment of persons with disabilities in Ukraine Confederation of Employers of Ukraine, (January 2026).

<sup>110</sup> United Nations Development Programme, Retrieved April 7, 2026.

<sup>111</sup> 10-Point Compact for Ukraine’s Just and Sustainable Peace, GIWPS, 22 April 2025.

and previously male-dominated professions such as transit, security, and demining, they continue to face barriers to equal representation in formal decision-making. Consultations with state authorities around conflict transformation and negotiation efforts remain largely formal and performative, failing to substantively incorporate evidence-based recommendations. The decentralised Gender Ombudswoman office is a theoretical success, but local WPS efficacy is inconsistent, heavily dependent on the individual capacity and workload of regional representatives.

The war has produced significant internal social fractures with pronounced gendered dimensions bearing directly on the sustainability of any eventual peace. IDP-host community tensions are the most extensively documented fault line. Veterans' reintegration is emerging as a further critical fault line: 89% of respondents to a survey consider it the most critical social issue for recovery.<sup>112</sup> The psychological dimension is severe, and the gendered dynamics of return – men returning to communities where women have assumed new economic and civic roles – remain largely unaddressed in current policy frameworks.

## 9. DEVELOPMENTS ON CONSUMER AND HEALTH PROTECTION

Article 31 of the draft Civil Code of Ukraine provides that a natural person's legal capacity arises from the moment of their birth; however, in cases specified by law, the interests of a conceived but not yet born child are protected. Such wording could lay the groundwork for a broad interpretation of the legal status of the embryo and the potential prioritisation of the interests of the foetus over the rights of the pregnant person, which could influence approaches to the regulation of reproductive rights and access to relevant services.

Ukraine's alignment with Chapter 28 is driven by the Law "On Digital Content and Digital

Services" and the updated Law "On Consumer Protection", which together transpose the requirements of the European Accessibility Act. These laws mandate that essential digital products and services, such as banking and e-commerce, must be accessible to women with disabilities by design, treating non-conformity as a contractual violation. This framework is further operationalised by the 2026 launch of the E-Consumer Portal, providing a formal mechanism to report accessibility barriers and ensuring compliance with the National Strategy for a Barrier-Free Environment.<sup>113</sup>

<sup>112</sup> Mobilizing 'Team Ukraine' for a successful recovery, Lutsevych, Orysia, Chatham House, 7 July 2025.

<sup>113</sup> „On Approval of the National Strategy for Creating a Barrier-Free Environment in Ukraine for the Period until 2030,” Cabinet of Ministers of Ukraine 14 April 2021

## Recommendations for the 2026 Country Report

1. Recommend further alignment of national legislation with the EU *acquis* on gender equality, human rights and non-discrimination, including adopting missing legislation and policies
2. Recommend further alignment of national legislation with the EU *acquis* on the rights of LGBTQI persons and anti-discrimination, including: amending the Criminal Code in relation to hate crimes on the basis of sexual orientation and gender identity (SOGIE); amending the Law on Principles of Preventing and Combating Discrimination to explicitly define and prohibit intersectional and multiple forms of discrimination; ensuring that the Civil Code, currently being drafted, recognises equal rights to same-sex partnerships in line with the EU *acquis* and does not discriminate against trans people.
3. Ensure the establishment and strengthening of formal, inclusive and accessible mechanisms for the participation of CSOs, including those working on women's and LGBTQI rights, the rights of displaced women, ethnic minorities, persons with disabilities, in the EU accession consultation process and reforms, moving beyond their role as service providers to recognised political partners.
4. Recommend that government and administrative institutions ensure the accessibility of facilities and public spaces to women with disabilities and that the guardianship model be revisited in order to guarantee equal participation for women with different types of disabilities
5. When reporting on FIMI, pay special attention to analysing gender- and identity-based disinformation (GID), which is one of the most widespread form of propaganda, in tandem, recommend amending the Criminal Code to address cyber violence
6. Include a thorough analysis of the connection between the circulation of small arms/light weapons and GBV, especially IPV, in cooperation with GBV organisations as part of the fundamental rights and rule of law obligations in the accession process
7. Recommend adoption of the regulatory framework for the implementation of the Law on the Legal and Social Protection of Persons Affected by Sexual Violence related to Russia's Armed Aggression Against Ukraine. Recommend allocation of adequate resources, designation of responsible institutions, and development of accessible reparation mechanisms for survivors, in line with EU Victims Rights Directive.
8. Ensure adequate support to inclusive peace and a human-centred peace and recovery processes, in line with the requests put forward by women leaders and women-led organisations<sup>114</sup>; ensure adequate support and funding for full and meaningful participation of women at all stages of the peace and recovery process; ensure adequate attention to the needs of survivors of CRSV and of women IDPs.
9. Analyse the human rights and security situation of diverse ethnic minority groups in and outside of Ukraine, as well as those of displaced Ukrainian women, including through recommending the adoption of more sustainable measures on how to support Ukrainian women refugees post-TPD, and through addressing IDP-host community tensions and the gendered dimensions of return
10. Recommend strengthening the system of collection and analysis of data disaggregated by gender, sexual orientation, or disability across all chapters of the report

**For all women's rights,  
in every corner of the world.**