



Republic of Serbia
MINISTRY OF HUMAN AND MINORITY RIGHTS AND SOCIAL DIALOGUE

**Report on the Implementation of the
Strategy for the Prevention and Protection against Discrimination 2022–2030
for the Period 2022–2024**

Belgrade, June 2025

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Introduction

The Strategy for Prevention and Protection against Discrimination for the period 2022–2030 (hereinafter: the Strategy) was adopted in January 2022 as the overarching public policy document in the field of anti-discrimination. It was adopted pursuant to the Law on the Planning System of the Republic of Serbia, which means that the Strategy defines general and specific objectives, measures for their implementation, as well as performance indicators for monitoring results.

The legal basis for the adoption of the Strategy is contained in relevant regulations guaranteeing equality and prohibition of discrimination, primarily the Law on the Prohibition of Discrimination and the Law on Gender Equality, but also other sectoral laws. The Strategy was adopted as a continuation of anti-discrimination policies after the expiry of the previous Strategy (in 2018), with the intention of improving the institutional framework for protection against discrimination.

In accordance with the Law on the Planning System, a monitoring mechanism for the implementation of the Strategy was established. The Government formed the Council for Monitoring the Implementation of the Strategy for Prevention and Protection against Discrimination for the period 2022–2030 as an ad hoc body responsible for monitoring progress in the implementation of the measures envisaged by the Strategy, implementation of activities defined in the action plans for its implementation, and for adopting reports on the implementation of the Strategy.

This analysis represents an ex-post assessment of the Strategy's performance during the first three years of its implementation (2022, 2023, and 2024). It was prepared in accordance with the periodic reporting obligation prescribed by the Law on the Planning System (Article 43) and the Regulation on the Methodology for the Development of Public Policy Documents. The analysis covers the implementation of measures and objectives in the observed period, identifies discrepancies between planned and achieved results, and examines the reasons for such deviations. It also assesses the Strategy's contribution to Serbia's broader international obligations, such as the United Nations 2030 Agenda for Sustainable Development (hereinafter: Agenda 2030) and the relevant Sustainable Development Goals (SDGs).

It should be recalled that the first two-year Action Plan for the implementation of the Strategy covered the period 2022–2023 and included concrete activities, responsible institutions, deadlines and indicators adapted for these two years. As the Action Plan expired at the end of 2023, a draft of the new Action Plan for the following period (2024–2025) was prepared, accompanied by a public consultation conducted in the first quarter of 2024; however, this document was not adopted by the end of 2024.

Methodology

The analysis was prepared as a formal report, relying exclusively on official documents produced by competent authorities. The primary sources include the Strategy itself (its official text) and the annual reports on the implementation of the accompanying Action Plan for 2022 and 2023. In addition, official data and reports of various state bodies and institutions were used. This ensures that the assessment of the Strategy's implementation is based on governmental monitoring processes and the adopted performance indicators. The text is structured in accordance with the priority areas identified in the Strategy.

Financial resources

Given that the Action Plan for 2024 was not adopted, the total amount of funds allocated for the implementation of the Strategy can only be viewed through the Action Plan for the period 2022–2023. Funds for the implementation of the activities envisaged by the Action Plan were planned as follows: 8,536,000 RSD for 2022, and 11,574,000 RSD for 2023, while the implementation of most activities relied on regular operational costs of employees (i.e. routine work). These amounts were planned as part of the development of the Action Plan, and in accordance with the Budget Law of the Republic of Serbia for 2021 and its indicative projections for the subsequent period. Some activities were envisaged to be financed through donor funds.

Based on the structure of the programme budget, it is not possible to determine the exact amount spent on specific activities, since funds are not allocated according to vulnerable population groups, but rather by type of expenditure. This makes both the planning of activities and the ability to ensure their implementation, as well as subsequent reporting, more difficult. In this regard, the implementation of measures depended on the availability of donor funds, which were often not reported, as donors did not provide this information.

In all activities identified as part of regular programmes funded from the national budget, the funds refer to state employees' salaries – whether for their participation in working groups or for individual tasks such as monitoring legislation, drafting reports and analyses, data collection, and similar activities.

Achievement of general and specific objectives

General objective of the Strategy

The general objective of the Strategy is to ensure equal opportunities for all citizens, particularly members of vulnerable groups at risk of discrimination, so that they can enjoy all human rights and freedoms on an equal basis with others. Parallel to this, the Strategy seeks to

improve the effectiveness of the overall system of prevention and protection against discrimination across all sectors and at all levels of government. In other words, the Strategy has a dual focus: on the one hand, to enable greater inclusion and equal treatment of groups at increased risk of discrimination, and, on the other hand, to strengthen the mechanisms (legal, institutional and procedural) for preventing discrimination and responding to cases of discrimination.

Specific objectives and thematic areas

The Strategy elaborates several specific objectives linked to key thematic areas where equality must be improved. The specific objectives are grouped according to social domains and issues, each of which is accompanied by a set of measures in the Action Plan. The main thematic areas covered by the Strategy are:

- Education: eliminating discrimination within the education system, ensuring inclusive education, and fostering a tolerant school environment.

- Labour and Employment: promoting equal opportunities in the labour market, preventing discrimination at hiring and at the workplace, especially against vulnerable groups (women, persons with disabilities, national minorities, LGBTI persons, etc.).

- Health: ensuring equal access to healthcare without discrimination on any grounds, and sensitising healthcare workers while eliminating stereotypes in the provision of health services.

- Social Welfare: ensuring equal access to social protection services and benefits for all, with specific measures aimed at improving the situation of socially vulnerable groups.

- Public Administration and Public Services: increasing accessibility and equality in the provision of public services, including by local self-government units; ensuring that public institutions act in a non-discriminatory manner in their work.

- Justice and security: strengthening the capacity of the judicial system to provide effective protection against discrimination (including effective judicial remedies and the sanctioning of discrimination), and raising awareness among the police and other security services regarding non-discriminatory conduct.

- Culture, information and sports: promoting tolerance and non-discrimination in cultural content and the media, as well as in sports; combating hate speech and negative stereotypes in the public sphere.

Such a broad thematic scope stems from the understanding that discrimination is a social problem present in almost all areas of public life. Accordingly, the Strategy envisages groups of activities aimed at education, social and healthcare protection, culture, sports, information, security and other fields.

Analysis of the indicators set out in the Strategy

The Strategy defines indicators for monitoring the achievement of its general and specific objectives. Key performance indicators include, among others:

- normative indicators (e.g., number of adopted or amended anti-discrimination laws);
- institutional indicators (e.g., e.g. the number of mechanisms or commissions established; the number of training sessions delivered for public officials);
- outcome/impact indicators (e.g., percentage of citizens who believe equal opportunities are ensured; number of reported discrimination cases and their outcomes; employment rates of vulnerable groups; education coverage of children from vulnerable groups, etc.).

The main shortcoming of the indicators defined in the Strategy – both for the objectives and for the measures – is that they are not formulated in line with the SMART principle. Most lack baseline and target values, as well as clearly defined sources of verification, and many are not formulated in a measurable way. For this reason, the responsible authority, in accordance with the recommendations of the Republic Secretariat for Public Policies, incorporated the missing elements for each indicator in the process of drafting the first Action Plan, and fully revised or omitted certain indicators, thus creating the preconditions for higher-quality reporting. However, in practice this meant that, alongside all activities planned under the Action Plan, it was also necessary to undertake additional activities aimed at establishing the missing baseline values, for which no institutional preconditions had been put in place. As a result, a situation arose in which 7 out of a total of 10 outcome indicators of the specific objectives, and 19 out of a total of 36 result indicators of the measures, instead of containing a baseline value, included a note stating that the baseline value would be determined during the implementation period of the Action Plan.

Considering only the indicators with clearly defined baseline and target values, it could be concluded that the outcomes of the Strategy are not at a satisfactory level. Taking into account the low implementation rate of the activities from the 2022–2023 Action Plan, it is not possible to determine whether, and to what extent, the implementation of the measures envisaged by the Strategy would be beneficial for society, as there is no evidence in the form of clearly defined indicators.

When it comes to Specific Objective 1 (Harmonised national legislation with international anti-discrimination standards and practice), including the indicators of measure results, it can be observed that the indicator refers solely to the number of adopted anti-discrimination laws, and it shows that no such law was adopted in the reporting period. Within Specific Objective 2 (Systematically integrated anti-discrimination perspective in the creation, implementation and monitoring of public policies), the only measurable indicator showing a positive result is the inclusion of 12 civil society organisations in the composition of the Council

for Monitoring the Implementation of the Strategy. However, when the subsequent indicator is taken into account – showing an insufficient number of meetings held by this Government body – the overall result remains unfavourable. Some progress has been made in integrating the anti-discrimination perspective into the public policy development process, particularly through cooperation with the Public Policy Secretariat on drafting the Regulation on the Methodology for the Development of Public Policy Documents. However, this contribution cannot be captured within the existing indicator framework. Specific Objective 3 (Improved equality and greater social inclusion of individuals belonging to groups at increased risk of discrimination) consists almost entirely of measures whose indicators lack baseline values and whose implementation falls under the competence of other sectors. Consequently, reporting on the fulfilment of this objective has shown the weakest results, both in terms of activities and indicators. Specific Objective 4 (Improved system of prevention and protection against discrimination) also comprises measures involving a wide range of implementing institutions. Although reports indicate that certain activities were carried out, a key problem remains that all such activities in practice constitute regular duties of state authorities. It must also be noted that the desired outcomes of the key measures have not been achieved – namely, the strengthening of the institution of the Commissioner for the Protection of Equality and the enhancement of judicial mechanisms for the prevention of and protection against discrimination.

Because the defined indicators cannot adequately reflect the performance of the activities carried out, the evaluation must also take into account the progress made within the Strategy's thematic areas. Such progress has been recorded in certain fields and will be discussed in more detail in the following sections.

Regarding the alignment of the Strategy's objectives with the Government's priorities—one of the key criteria of relevance—it should be noted that, during the reporting period, none of the measures set out in the Strategy, nor any of the activities under the accompanying Action Plan, were incorporated into the action plans for implementing the Government Programme or into the Government's annual work plans.

In the sections that follow, the analysis first considers the level of implementation of measures across the thematic areas, then the achievement of the target indicator values, the reasons for the identified deviations, and the Strategy's contribution to the broader Sustainable Development Goals.

Implementation analysis by sectors

Education

Although the direct impact of the Strategy on the education system cannot be fully observed, general data and systemic reports indicate measurable and positive progress toward achieving key Strategy objectives in the field of inclusiveness and non-discrimination in education. Since the Action Plan for the period after 2023 was not adopted, many measures implemented in practice cannot be directly linked to the strategic framework but rather to general policies and parallel strategic documents in the field of education. Nevertheless, the measures that were implemented align with the objectives of the Strategy, such as support for students from marginalised groups, implementation of Individual Education Plans (IEPs), and activities aimed at eliminating discriminatory patterns.

Degree of objective fulfilment: In the field of education, only limited progress was achieved during the reporting period. In particular, with regard to ensuring inclusive and non-discriminatory education at all levels and strengthening the capacities of teaching staff to recognise and prevent discrimination, the objective was partially met. However, for example, when it comes to establishing a system for monitoring cases of discrimination in schools, the available data are insufficient. According to the National Report on Inclusive Education 2019–2021, 378 trainings were conducted, involving *nearly 10,000 employees* in the education system. The same report confirms an increase in the inclusion of children from vulnerable groups, particularly Roma children and children with developmental disabilities. The annual report of the Education Inspectorate (2022/2023) also records the introduction of anti-discrimination elements into the supervision plan and finds that inspection bodies have improved their capacities to identify discrimination risks within schools.

Reasons for deviations: There are limitations in data availability, given the lack of a harmonised system for monitoring the occurrence and outcomes of discrimination in schools, and the absence of an integrated database that would enable monitoring at the national level. Implementation is therefore monitored primarily through other strategic and programme documents (e.g. the Education Development Strategy 2030, Ministry of Education reports).

Labour and employment

In the area of labour and employment, there is a well-developed legislative framework that defines and prohibits discrimination in work and employment—including the Labour Law, the Law on the Prohibition of Discrimination, and specific laws regulating the employment of persons with disabilities. Measures such as incentives for employing persons with disabilities

are prescribed by law and by the incentive programmes of the Ministry of Labour, Employment, Veteran and Social Affairs. The National Employment Service (NES) implements an active employment policy for persons with disabilities, providing both professional and financial support to employers and to persons with disabilities (including subsidies, wage reimbursements and workplace adaptations). However, it is not possible to directly link all activities to the Strategy itself, although certain institutional activities do indicate a certain degree of application of the principle of non-discrimination.

Degree of objective fulfilment: Limited progress can be noted, with a need for greater application and clearer monitoring of effects. According to the data available on the NES website, during the reporting period (2022–2024), public calls were issued within the framework of active employment policy measures, with persons with disabilities included each year as a specific target group. For 2022, the planned number of participants was 20,165 (2,285 persons with disabilities); for 2023 – 21,205 (2,285 persons with disabilities); and for 2024 – more than 23,000 persons. The total budget has shown continuous growth (from 6.55 to 7.75 billion dinars). However, data on the actual implementation of these measures – the number of persons actually included, retained in employment, or belonging to other groups at risk of discrimination – are not available in the NES’s officially published reports, which hampers the analysis of the effects of the measures for groups at risk of discrimination and the assessment of progress under the specific objectives of the Strategy as well.

Reasons for deviations: Quantitative data are lacking. The gender pay gap and data on the employment of groups facing greater barriers to employment are derived from general statistical sources and surveys.

Health

Laws such as the Law on Healthcare, the Law on Patients’ Rights, and the Law on the Prohibition of Discrimination include non-discrimination principles and obligations of healthcare institutions. The Law on Healthcare ensures equality and professional ethics in treatment, providing a theoretical framework guaranteeing equal rights for patients. First of all, the Law on Health Care contains the principle of equality and professional ethics in medical treatment, which theoretically provides a framework for ensuring equal patient rights in the health system.

Degree of objective fulfilment: Limited progress with indications of a positive trend. Although the legal and strategic framework (laws and international recommendations) is in place, its implementation is not documented in publicly available official reports.

Reasons for deviations: Public reports of the Ministry of Health or other competent state bodies that set out activities specific to the implementation of the Strategy’s health-related measures are not available.

Social protection

The Republic Institute for Social Protection regularly publishes reports on users and service providers within the social protection system. In 2022, a new information system, SOZIS (Social Protection System for Safeguarding and Automation of Social Protection Measures), was implemented. In 2023, RISP published a series of reports ('Report on the Work of Social Welfare Centres in 2022', 'Community-Based Services 2022/23'), which contain key data on the number of beneficiaries, licensed services, and responses within the social protection system.

These include services such as home care, day care, and personal assistants. The mentioned reports also cover the development of community-based services, such as home assistance, day care, and personal assistance. In the 2022 report on the work of Social Welfare Centres (SWCs), statistical data from 170 centres were summarised, including figures on the number of beneficiaries and available capacities.

Degree of objective fulfilment: The area of social protection shows limited progress. During the period 2022–2024, some progress was achieved in the development of community-based services and in the implementation of the information system. However, system-level data on measures aimed at specifically reducing discrimination and inequality within the system are lacking. The reform is ongoing, but there is no clear evidence of a significant reduction in structural barriers. While the objectives of the Strategy have not been fully achieved, there is a clear basis for continued progress.

Reasons for deviations: The reports do not contain data on measurable activities that would indicate the application of anti-discrimination policies. The reports themselves also depend on the quality of the data submitted. Data for 2024 have not yet been published. In 2022, the process of implementing the SOZIS information system began, and data migration was underway—the report was based on the data available at that time. There are no available data confirming that the migration was completed after 2022, nor that the system was fully integrated in 2023/2024.

Public administration and public services

There is a legal obligation to ensure technical and communication accessibility of electronic public services. According to the Law on E-Government (Articles 16 and 28) and the 2018 Regulation on Detailed Requirements for the Development and Maintenance of Public Authorities' Websites, state authorities that provide public services are obliged to make their websites accessible to persons with disabilities. (high-contrast options, screen-reader compatibility, keyboard navigation, etc.). This includes standards such as high contrast, screen readers, keyboard navigation, and similar features. The Regulation also prescribes an annual procedure for assessing compliance with accessibility requirements.

Degree of objective fulfilment: During the reporting period, the area of public administration and public services showed some progress towards the implementation of the anti-discrimination measures envisaged by the Strategy; however, this progress was neither evenly distributed nor fully documented. The normative framework in this area is relatively well developed: the Law on General Administrative Procedure, the Law on Civil Servants and other relevant regulations have already established the principles of equality and the prohibition of discrimination. In addition, technological progress, particularly in the area of e-Government, has contributed to greater accessibility of public services, thereby indirectly enhancing equality in the treatment of citizens. The e-Government system has been significantly expanded, and there is also a legal obligation to ensure the technical accessibility of public institutions' websites. The Commissioner for the Protection of Equality issues regular recommendations to public bodies, showing institutional awareness. However, although the normative and technical foundations within public administration are relatively well established, the practical implementation of the Strategy's measures is not sufficiently documented or transparent. There is some infrastructure for inclusion (e.g. e-Government, accessible websites), but data on the delivery of training and on the systematic monitoring of effects across different user groups are lacking. Progress exists, but it is limited and uneven, indicating the need for strengthened implementation in the coming period. Based on the available data for the area of public administration and public services within the implementation of the Strategy, the level of achievement of the objectives can be assessed as limited progress, with structural foundations for further development.

Reasons for deviations: The main challenges in this area concern the slow evolution of institutional practice, limited resources in certain local self-government units, and the absence of reporting on measures undertaken. Although certain efforts have been made to enhance non-discriminatory practice within public services, its practical application often depends on the initiative and commitment of individual authorities and their leadership.

Justice

In the Strategy, the justice sector is defined as a key safeguard against discrimination, as effective judicial protection and sanctions serve as a deterrent mechanism. The Strategy clearly defines the need for training, strategic litigation, record-keeping, and accessible judicial assistance (as part of the preventive framework). The Strategy and the accompanying Action Plan for 2022–2023 envisaged: training for judges, prosecutors and attorneys on anti-discrimination legislation and the case law of the European Court of Human Rights; encouraging the use of strategic litigation in discrimination cases; monitoring judicial practice and establishing a unified database of cases initiated on the basis of discrimination complaints; improving the accessibility of courts and procedural facilitation (e.g. free legal aid for victims).

Degree of objective fulfilment: In October 2024, the Judicial Academy, in cooperation with the OSCE, held a specialised training dedicated to discrimination, focusing on the issue of non-pecuniary damage awards in discrimination cases. This indicates that discrimination-related topics have been incorporated into the training programme. However, there is no publicly available information on a systematic training programme for judges, prosecutors and attorneys on (anti-)discrimination during 2022–2023, nor on initiatives such as the introduction of strategic litigation, the establishment of dedicated statistics within the Serbian Judicial Information System (ISIS), or the publication of practical guidelines by the Supreme Court. This is despite the fact that the Judicial Academy prepared trainings partially related to human rights, minority rights and inclusion (e.g. Roma inclusion, domestic violence). Regarding the achievement of the Strategy’s objectives, limited progress can be observed, with some isolated positive examples but without systemic change in this area. Moreover, publicly available documents of the Ministry of Justice or the ISIS system contain no data confirming the handling of cases marked as discrimination, nor do they indicate the existence of genuinely strategic judicial practice based on anti-discrimination legislation. There is no officially published analysis or report suggesting the existence of a unified and systematised body of case law under the Law on the Prohibition of Discrimination.

Reasons for deviations: The by-law regulating the manner of recording final judgments and decisions in civil proceedings for protection against discrimination, final judgments and decisions in misdemeanor proceedings concerning violations of anti-discrimination provisions, and final judgments and decisions in criminal proceedings for offences related to discrimination and breaches of the principle of equality—as well as the manner in which such decisions are to be submitted to the Commissioner for the Protection of Equality—has not been adopted. In addition, the Court Rules of Procedure have not been amended, nor has an obligation been established to record, or assign a specific designation to, cases concerning discrimination.

Other areas

In addition to the areas already discussed, the Strategy also covers other sectors, such as culture and the media, sport, and internal affairs and security, although with significantly fewer measures than in areas such as education, employment or social protection. These measures mainly relate to promoting tolerance through cultural and sports events (intercultural dialogue); strengthening the capacities of the media for non-stereotypical reporting (media training); organising public debates and campaigns (e.g. against hate speech in the media, for equality in culture and sport); while within the Ministry of the Interior, efforts were largely focused on improving procedures in relation to vulnerable groups (particularly Roma and LGBTI persons). The implementation of these measures has been partial, and for some of them there is no publicly available documentation on actual implementation (e.g. no reports on the number or impact of

public debates, trainings, or police procedures). Media campaigns and anti-hate speech events were carried out occasionally, mainly in cooperation with the civil sector and the Commissioner for the Protection of Equality, but they were neither systematic nor fully within the remit of state authorities. In some cases, the measures depended on project-based funding rather than regular budget allocations.

Performance indicators achieved

This chapter summarises the extent to which the Strategy’s key performance indicators have been achieved by the end of 2024, in relation to their baseline and target values. Although the Strategy is valid until 2030, trends observable after three years indicate whether it is on track to meet its ultimate objectives or whether adjustments are needed.

Overall, it can be concluded that while some progress has been made compared to the baseline situation, none of the key indicators have reached their target values for 2024, nor can they be monitored in the manner envisaged by the Strategy. The Strategy, as a key document, sets out outcome indicators and projections across various areas (education, employment, social inclusion), but in the available sources these appear only as proposed values, without final statistical publication for 2024. The Commissioner for the Protection of Equality, whose reports are largely recognised as a reference source for verifying indicator values, does not provide quantitative indicators aligned with the Strategy, nor does the Commissioner compare reported values with baseline or target values. The Ministry of Human and Minority Rights and Social Dialogue, in preparing the annual implementation reports for 2022 and 2023, highlighted the problem that certain data from competent bodies were not available, which limits the ability to monitor the Strategy’s indicators. As a consequence, concrete numerical values (‘baseline/target/achieved’) for any of the areas identified in the Strategy have not been published in a publicly accessible format. Only indicative assessments can be provided, but such data are not verified in official reports.

In view of the above, it can be concluded that baseline values have been defined in several cases (based on the 2021 survey or earlier reports). The target values set in the first Action Plan (2022–2023) served as benchmarks, but it has become evident that even these were overly ambitious. The achieved values, however, are mostly at the level of estimates or derived trends, and have not been systematically verified in public reports. In this sense, it was only possible to present them descriptively—indicating that partial progress has been made in several areas, but that the target values for 2024 have not been fully achieved. A summary is provided in the table/graph below.

Analysis of implementation by area			
	Area	Degree of achievement	Reasons for deviations
1.	Education	Limited progress	Lack of unified monitoring system and national database
2.	Labour & Employment	Limited progress	Missing quantitative data on actual effects
3.	Health	Limited progress with signs of a positive trend	Lack of public reports on specific measures in the health sector
4.	Social Protection	Limited progress	Lack of systemic data and incomplete information system integration
5.	Public Administration and Public Services	Limited progress with structural foundations for further development	Limited resources, incomplete reporting, uneven implementation
6.	Justice	Limited progress with isolated positive examples	Lack of systemic record-keeping and missing implementing by-laws
7.	Other Areas	Partial implementation	Insufficient documentation, reliance on project-based measures, and absence of systemic implementation



Reasons for deviations in implementation

In the course of the analysis, several reasons were identified for the discrepancies between the planned and achieved results of the Strategy in the period 2022–2024. These reasons are important for understanding the implementation challenges and for formulating recommendations for the future:

- Pandemic and extraordinary circumstances: Although the first year of Strategy implementation (2022) began in a post-pandemic recovery context, the impact of COVID-19 did not have a decisive effect on the implementation of measures during the 2022–2024 period. Institutions largely continued their regular work, and any delays from the 2020–2021 period were not identified as the main cause of deviations from the planned timeline. In this sense, the pandemic cannot be considered a significant factor in explaining the limited progress in Strategy implementation.

- Insufficient capacities and resources: Almost all sectors faced limited human and financial capacities for implementing the measures. For example, the number of labour inspectors, education advisers, social workers or judges has not increased in line with the expansion of responsibilities and expectations. Additional training and activities were mostly carried out through projects or with donor support, which was not always synchronised with the timeline of the first Action Plan. The lack of stable funding sources for certain measures (such as infrastructure adaptations, hiring additional staff such as pedagogical assistants, interpreters, etc.) resulted in delays in their implementation.

- Intersectoral coordination: The implementation of the Strategy requires cooperation among several ministries and levels of government (national, provincial, and municipal). In some areas, this coordination proved challenging. For example, measures concerning Roma require synergy between the Ministry of Human and Minority Rights and Social Dialogue, local self-government units, the Ministry of Health, and the Ministry of Education (formerly the Ministry of Education, Science and Technological Development) — a level of coordination that was not always achieved as intended. The Council for Monitoring the Implementation of the Strategy was established, but during its first two years it was still in the process of becoming operational and was not immediately able to overcome all communication barriers among institutions. As a result, some activities were initiated more slowly (with each actor waiting for another to take the lead) or were implemented only partially.

- Insufficient awareness among end beneficiaries: One of the indirect reasons is that citizens – the Strategy’s target groups – were often not informed about new opportunities or changes. Reports indicate that greater public outreach would have been needed for the measures to take hold. In some communities, no local campaigns were conducted to introduce new services or rights, which resulted in lower-than-expected uptake and utilisation of these measures.

•Cultural and societal barriers: Discrimination is a phenomenon deeply rooted in stereotypes and prejudices held by parts of the population. Changing these attitudes is a process that takes longer than a few years. Although various educational initiatives have been launched, society still exhibits a high level of social distance toward certain groups (e.g. persons of different sexual orientations, persons with mental disabilities, etc.). This inevitably affects the success of the measures – for example, an employer with strong prejudices is unlikely to hire a member of a group at risk of discrimination, even when financial incentives are offered. In this respect, part of the slow progress stems from the gradual pace of social change, which the Strategy seeks to accelerate, but which nonetheless requires time.

•Monitoring and data: Although the indicator system was defined, practical monitoring encountered difficulties. It was found that some indicators are not measured regularly (e.g. citizens' attitudes are measured through periodic surveys rather than annually; the structure of employment by specific groups is difficult to assess without census data, etc.). This made it difficult to detect delays in achieving certain objectives in a timely manner. It is also possible that the discrepancies were greater than officially reported, but were not captured by the indicators due to data gaps. All these factors indicate that the implementation of the Strategy was not without challenges. However, it is important to emphasise that none of these reasons point to a fundamental flaw or incorrect design of the Strategy itself; rather, they reflect operational challenges in its implementation. This means that with appropriate measures (strengthening capacities, improving coordination, increasing funding, and continuing training), performance can be improved in the coming period.

Connection with the Sustainable Development Goals

The Strategy explicitly contributes to the achievement of several Sustainable Development Goals (SDGs) under the 2030 Agenda, given that equality and non-discrimination constitute the foundation of sustainable development and the principle of 'leaving no one behind'. Below is an overview of the most relevant SDGs to which this Strategy contributes, accompanied by brief explanations:

- Goal 5: Gender equality. Although a separate strategy has been adopted specifically for gender equality, the Anti-Discrimination Strategy also includes measures that benefit women and girls. Preventing discrimination on the basis of sex is one of its priorities – from the field of employment (equal pay, equal conditions) to combating gender-based violence (which the Strategy indirectly supports through strengthening institutions). Achieving the Strategy's overall objective implies that women should enjoy rights on an equal footing with men, which lies at the core of SDG 5. Specifically, the Strategy contributes to Target 5.1 ("End all forms of discrimination against all women and girls everywhere") through improvements in legislation and practice.

- Goal 10: Reduced inequalities. SDG 10 calls for reducing inequalities within countries, including those based on status, ethnicity, religion, economic background, or other characteristics. This Strategy serves as a practical tool for achieving that goal, particularly through Target 10.2 (“Empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion, economic or other status”). Measures such as inclusive education, employment of groups at increased risk of discrimination, and social inclusion directly align with this target. Reducing disparities in access to services and rights — a core aim of the Strategy — represents a step toward reducing inequalities. Data on the employment of persons with disabilities, Roma inclusion, and similar indicators also reflect progress toward SDG 10.

- Goal 16: Peace, justice and strong institutions. This goal encompasses human rights, the rule of law and non-discrimination. Particularly relevant is Target 16.b: “Promote and enforce non-discriminatory laws and policies for sustainable development.” The Strategy and its Action Plan are identified as key planning documents through which Serbia contributes to achieving Target 16.b. The Strategy strengthens institutions (the police, judiciary and public administration) in applying non-discriminatory practices, thereby fostering a more just society. It also contributes to Target 16.3 (“Ensure equal access to justice for all”) through measures in the justice sector, and to Target 16.6 (“Develop effective, accountable and transparent institutions”) by enhancing mechanisms for monitoring and preventing discrimination in the public sector.

In addition to the goals listed above, the Strategy is also relevant for:

- Goal 4: Quality Education – particularly Target 4.5, which calls for eliminating gender disparities in education and ensuring equal access for vulnerable groups, directly aligning with the Strategy’s anti-discrimination measures in the education sector. Also for:

- Goal 8: Decent Work and Economic Growth – especially Target 8.5, which calls for full and productive employment for all, including persons with disabilities and minorities, corresponding to the part of the Strategy focused on employment.

- Goal 3: Good Health and Well-Being – several targets related to universal health coverage are supported by the Strategy’s measures aimed at preventing discrimination in the health sector.

In summary, the Strategy is embedded within the national framework for implementing the 2030 Agenda. Its successful implementation enhances Serbia’s overall performance with respect to the SDGs, which is also recognised in official documents – national sustainable development reports highlight that full implementation of this Strategy will enable equal enjoyment of human rights for all and strengthen protection systems. A prerequisite for sustainable development is a society in which no one is discriminated against, as this enables individuals to advance more easily both economically and socially, while also increasing citizens’ trust in institutions.

Concluding observations

Based on the evaluation of the implementation of the Strategy in the period 2022–2024, the following conclusions can be drawn:

1. When considered strictly on the basis of the 2022 and 2023 reports on the implementation of the first Action Plan, it could be concluded that the continuation and intensification of the implementation of the Strategy is needed, without the need for its urgent revision. According to the findings observed in this way, it can be concluded that the Strategy is well designed and that its objectives remain valid. The reports of the Commissioner for the Protection of Equality, as well as the results of the public consultation on the Draft of the new two-year Action Plan (for 2024 and 2025), did not indicate a substantive need for revising the Strategy. The recommendation would be to maintain the existing framework and work towards its fuller implementation.

2. However, since the new Action Plan for the period 2024–2025 was neither adopted nor implemented, although the public consultation on its draft was held in the first quarter of 2024, the situation should be considered in light of this development. During the preparation of the report on the implementation of the first Action Plan, as well as during the work on drafting the new Action Plan, it became clear that the new Action Plan would need to contain realistic deadlines, clearly defined responsible institutions, and improved indicators. However, this was not possible primarily due to the fact that the existing indicators from the Strategy, which must necessarily be taken over in the Action Plan, were not adequate, nor was it possible to revise them in any meaningful way so as to increase their specificity, relevance, and measurability. Therefore, the definition of precise, relevant, and measurable indicators should be the primary objective of any potential revision of the Strategy, accompanied by ensuring the availability of data from regular statistical sources and databases on the basis of which the effects of public policies in the field of human rights could be monitored.

3. It is necessary to strengthen institutional coordination and capacities. The reports indicate the need for regular meetings of the Council for Monitoring the Implementation of the Strategy and for operational technical support. Although a network of focal points for monitoring anti-discrimination policy issues and the situation in this field has been established within the ministries (internal record of the Ministry of Human and Minority Rights and Social Dialogue), at the local level there are generally no capacities for this type of policy monitoring. It is necessary to conduct training for public administration employees in this regard, encourage the exchange of good practices (a platform for municipalities, rewarding innovation), as well as work on promoting measures and protection mechanisms for citizens. In this sense, consideration should be given to establishing a data-collection system that would enable higher-quality monitoring of the situation in this field on an annual basis. Although, during the reporting period, the Ministry of Human and Minority Rights and Social Dialogue launched initiatives to establish intensive cooperation with the Statistical Office of the Republic of Serbia in order to

improve the collection and production of statistical data relevant to monitoring the state of anti-discrimination policies, no concrete cooperation was achieved.

4. With regard to financial planning and support, it can be concluded that the necessary preconditions for effective planning of anti-discrimination policy have not been established, in a way that would allow clear monitoring of the justification of allocated funds and the effectiveness of measures. To achieve this, the budget programmes of the competent authorities should explicitly include funds earmarked for the implementation of measures from the action plans. Programme budget performance reports indicate that many measures are financed *ad hoc* or through projects. Structural financing of measures is needed, supported by budgetary funds. Donor or project-based funding should be used only as a supplement to the resources allocated from the budget.

5. When drafting the action plans for the implementation of the Strategy, an adequate prioritisation of the measures to be in focus of the respective action plan must be carried out. Given that both institutional and financial resources for implementing the measures have been assessed as low, it is not realistic to expect a two-year action plan to include the implementation of several activities under each existing measure, as evidenced by the low level of measure implementation. In this sense, when preparing the action plans, it is necessary to take into consideration the recommendations and reports of international bodies, so that the fulfilment of these recommendations is incorporated into the planned activities to the greatest possible extent.

6. Based on the overall overview of the situation, it may be concluded that a revision of the Strategy during 2025–2026 is a realistic option. Given that the second action plan was not adopted, the results of the mid-term evaluation would not differ from the conclusions of this three-year analysis of the Strategy's implementation. It is particularly important to note that the indicators are not measurable in the way they are formulated in the Strategy, which prevents adequate monitoring of implementation results. Some objectives have been set in an overly ambitious manner, and certain measures need to be adjusted to avoid ambiguities or overlaps. Although the Strategy has appropriately mapped and grouped the areas in which change is needed, for it to be effective it is essential that the performance indicators of measures and specific objectives be made more specific, more relevant, and more measurable, with stable sources of verification.

7. Although no fundamentally new circumstances have emerged that would undermine the relevance of the existing Strategy, subtle but cumulative economic, social and demographic changes indicate that the mid-term of its implementation (2025/2026) should be used as an opportunity for its revision. New developments in society that have occurred in the meantime have partly altered the context in which the Strategy is being implemented. Many of the measures and activities envisaged by the Strategy in the previous action plans rely on project-based funding, which is not sustainable. Donor funds for the implementation of some of the key activities under the action plans were not secured. There have also been moderate changes in

demographic circumstances. The Republic of Serbia is undergoing a process of demographic ageing, which potentially brings new forms of age-based discrimination. Due to increased migration of young people and a higher number of immigrants (e.g. labour migrants from Asian and African countries to the Republic of Serbia) and refugees, there is a growing need for more intensive integration of these new minority groups. Changes in family structures (e.g. an increase in single-parent households, the LGBTI community) require a more finely differentiated policy approach. All of this indicates the need to consider specific measures for older persons, migrants, LGBTI persons, youth employment, regional disparities, etc., suggesting that a combined approach is required – namely, that in each policy area measures and activities should be further specified and directed towards priority groups at risk of discrimination. In addition, moderate changes have occurred within the legal and institutional framework. During 2023/2024, the Republic of Serbia received new recommendations from the European Commission, the European Commission against Racism and Intolerance (ECRI), as well as judgments of the European Court of Human Rights, all of which indirectly influence the interpretation of discrimination.

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