



## CHAPTER 24

# NORTH MACEDONIA SHADOW REPORT



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## **CHAPTER 24 NORTH MACEDONIA SHADOW REPORT**

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**ОТБОРЕНА ПОРТА**  
AGAINST VIOLENCE AND TRAFFICKING



The Shadow Report focus is on fight against organized crime and human trafficking. The report assesses the progress in combatting human trafficking and present recommendations for further actions. The period covered with this report is 2021 and 2022.

- Current situation**
- Legal framework well developed and is continuously upgraded.
  - Right to free-of-charge medical services does not apply to all victims.
  - Current compensation procedure is complex and bureaucratic.
  - Limited access to justice, late appointment of legal representatives.
  - Well-established cooperation between the state & non-state actors.
  - Lack of availability and limited access to some public health services.
  - Mobile teams are a good practice in proactive identification and cooperation between civil society and government.
  - The number of officially identified victims does not reflect the reality.
  - Labour exploitation is not easily identified.
  - Shelter has limited capacity, services for man or foreign victims are missing, children accommodated together with adults.
  - Reintegration of human trafficking victims weak.
  - Immigration detention used for unaccompanied children.
  - Capacity of the anti-trafficking system influenced by a high turnover of staff, as well as lack of knowledge and sensitivity

- Progress**
- Legal framework upgraded with new law on violence against women, law on compensation, new strategy and action plan, and by-laws regulating cooperation between institutions.
  - New operational team for coordination and management of human trafficking cases established.
  - One victim received compensation.
  - The state labour inspectorate conducted 514 inspections in the agriculture sector, not one victim of human trafficking identified.
  - The mobile teams were reactivated, assisted 260 persons, and identified 67 potential victims of trafficking.
  - CSO provided legal aid and information to 6 officially recognized and to 55 potential victims of human trafficking.
  - Seven persons were sheltered in the Center.
  - Ten individuals were identified as potential and 48 as officially recognized victims of human trafficking.

- Recommendation** → Continue with the good practice of CSOs contributing in the making of legislation/policy and participate in its implementation.
- Invest in effective access to compensation.
  - Support free medical services for all victims.
  - Ensure sustainability of the mobile teams.
  - Expand the current shelter services.
  - Ensure continuous funding for the shelter.
  - Improve access to active employment measures.
  - Discontinue use of detention for unaccompanied children.
  - Ensure timely appointment of legal representative.
  - Advance identification efforts.

## I. INTRODUCTION

This Shadow report is produced under the framework of the operating grant: *Listen the voice of trafficked persons and fight organized crime*. The purpose of this grant is to support participatory democracy as part of North Macedonia's European integration process. One of its objectives is to empower civil society actors to actively monitor the government policies, to take actions in the fight against organized crime and to become a strong victim advocate.

The Shadow Report focus is on fight against organized crime and human trafficking. The report assesses the progress in combatting human trafficking and present recommendations for further actions. The period covered with this report is 2021 and 2022.

This report was prepared based on interview with stakeholders and desk review of policy, various reports prepared by government authorities, civil society actors and media representatives.

## II. OVERVIEW OF CHAPTER

The EU accession process is put in place to assess the readiness of applicant countries the ability to take on and effectively implement the obligations of EU membership. The assessment is done according to three accession criteria: political, economic and the EU *acquis* criteria. The 35 chapters of the *acquis* form the basis of the accession negotiations.<sup>1</sup>

In February 2020, a revised methodology for the accession negotiations was introduced. The negotiating chapters were divided in six thematic clusters, allowing for a broader thematic engagement with the accession countries. One of the six clusters is the Fundamentals that among other things looks at judiciary, fundamental rights, justice, freedom & security. Negotiations on the fundamentals open first and close last and the progress under the fundamentals' cluster determine the overall pace of negotiations.<sup>2</sup>

Chapter 24 belongs to the Fundamentals. Chapter 24 looks at the progress in the areas of freedom, security, and justice. The issues covered within Chapter 24 are:

- Border control
- Visas
- External migration
- Asylum
- Police cooperation
- Fight against organised crime and against terrorism,
- Cooperation in the field of drugs
- Customs cooperation
- Judicial cooperation in criminal and civil matters.

The focus of this report is organized crime and the fight against human trafficking, including migration in the context of human trafficking.

### III. CURRENT SITUATION

#### Legislation

1. There is a consensus that the **legal framework is well developed and is continuously upgraded**.
2. Victims of human trafficking have **right to claim compensation** for material and non-material damage. It can be done by joining the criminal proceedings and/or before the civil court. The Law on Criminal Procedure provides legal grounds for compensation of damages from state funds to victims of crime for which the Criminal Code prescribes minimum four years of imprisonment. However, only child victim of human trafficking, sexual assault, and rape can get compensation from the state fund available in the Ministry of Justice. This right is guaranteed under the Law on Justice for Children.<sup>3</sup>
3. All victims that are nationals or foreign victims with a permit to stay, have a right to free-of-charge **medical services**. This right does not apply to nationals who are missing birth certificate or other types of personal documentation, and to foreign victims without legal right to stay in the country. The laws do not provide for free-of-charge psycho-social support and medicine.

#### Institutional

4. The current **compensation procedure is complex and bureaucratic**. In practice this means, that once the compensation is approved by a court decision, the victim has to initiate the procedure for the execution of the judgment. Once this procedure is completed, another court has to pass a decision that the victim was unable to claim the compensation from the defendant through the procedure for the execution of the judgment. Then that court issues a decision, based on which the Ministry of Justice is bound to pay the compensation claim. The complexity of the process often discourages victims from pursuing action and as a result the number of persons who have claimed and received compensation is low.<sup>4</sup> In some cases of human trafficking, the victims apparently could not file a compensation claim because neither they nor their lawyers were invited to the main hearing.
5. Some groups of people have limited **access to justice**, especially people without legal identity (no ID and citizenship) and irregular migrants transiting through the country who are victims of violent criminal acts.<sup>5</sup> Legal aid to human trafficking victims is provided by the CSO Open Gate/La Strada, through counselling and legal representation in the court hearings. The Free Legal Aid Law gives right to victims to obtain free legal aid through the Ministry of Justice regional departments of the or through authorized CSOs. However, none of the victims used this right due late appointment of legal representative.
6. There is a **well-established national cooperation** between the state and non-state actors. CSOs have formal and unformal role in prevention, identification, and protection of human trafficking victims, they influence policy and legal making, they provide direct support services to victims, and they are participating in the work on the national coordination bodies.
7. In practice, the right to **medical help is limited**. There is a lack of availability and limited access to some public health services, such as psychiatric treatment, there is a long waiting time to have an appointment though the "Moj termin" platform, and the administrative personnel working in the medical institutions is not always informed and know about the right to free medical assistance. Access to medical services was difficult during COVID19. Free-of-charge testing was available to victims, however there were very long waiting time to get a medical appointment to test, up to few months. Due to the immediate need for testing, the NGO Open Gate was covering the expenses for COVID19 testing. The drug treatment is tailored for adults not for children, thus depriving child victims of human trafficking who at the same time have drug addiction to access services needed for their rehabilitation. Absence of such service has a great impact on the court case and its final outcome. Namely, if a child is not offered an age-appropriate drug treatment, the child cannot stabilize and give a statement to the authorities, based on which the authorities can prosecute the case.

8. The **Office of the National Referral Mechanism (NRM)** within Ministry of Labour and Social Policy (MoLSP) remained responsible for coordinating the identification and referral procedures. First responders referred potential victims to the anti-trafficking unit and/or the NRM, which are authorized to officially identify victims. NRM officials and social workers participated in interviews with potential victims, however the police did not consistently include NRM officials and social workers at the outset of identifying potential trafficking cases.<sup>6</sup>
9. The **mobile teams** are considered as a **good practice in proactive identification and cooperation** between civil society and government. The mobile teams were established in 2018 as part of a donor supported project to the MoLSP, identify the majority of potential victims every year. They consist of police officers from the National Unit to Combat Human Trafficking and Migrant Smuggling (Task Force), social workers and representatives of non-governmental organizations. In 2020/2021, funding constraints and the pandemic, limited the mobile teams' ability to proactively identify potential victims.<sup>7</sup>
10. There is a consensus that **the number of officially identified victims does not reflect the reality** on the ground. Despite the fact that the number of officially identified victims in 2021, was significantly higher compared to the previous year/s. However, this was due the identification of one large group of Taiwanese persons trafficked for the purpose of labour exploitation. **Barriers** that prevent a **more efficient identification** of human trafficking victims are insufficient human resources, lack of cooperation of victims as witnesses, lack of trained and specialized personnel, lack of consistently screening for trafficking indicators at border crossings or during raids in casinos, nightclubs, and bars etc.<sup>8</sup>
11. Inadequate identification efforts are also observed when local police **deported foreign potential victims** before their two-month reflection period expired. Additionally, local police detained and deported individuals in commercial sex without screening for trafficking indicators or notifying the Task Force.<sup>9</sup> Border police does not consistently screen for indicators of trafficking and, as a result, authorities likely deported some unidentified trafficking victims without referral to appropriate services or safeguards to prevent re-trafficking.<sup>10</sup>
12. The context in which the professionals operate is the widely accepted that trafficking happens for the purpose of sexual exploitation. So, the efforts to identify victims are concentrated in the commercial sex. As a result, victims trafficked for the purpose of **labour exploitation** might not be identified. Another reason is that the labor inspectors, who are responsible for identifying labor exploitation, they don't recognize it as such, and during regular inspections, they do not pay attention to whether there are victims of human trafficking, rather they evaluate the compliance of the inspected place with the employment related laws.<sup>11</sup>
13. Open Gate/La Strada runs the only shelter in the country i.e., a **Center for victims of human trafficking** (hereafter the Center). The Center is a government licensed service with capacity for six persons, women and girls, nationals and foreign citizen who have temporary residence permit. The shelter is located in the capital and offers housing, food, access to medical, access to education, legal, and psychosocial assistance, vocational training, creative and educational workshops. There is no specialized service to accommodate man or foreign victims of human trafficking, and children are sometimes accommodated together with adults. The foster families and small group homes exists as services, but not specialised to work with human trafficking victims.
14. A worrying problem in the country is the **reintegration of human trafficking victims into the community** once they leave the shelter. This is primarily due to the absence of long-term sustainable programs to support their reintegration in the community. The Employment Agency implements the **active employment measures** provided by the state. The current system of the employment agency does not guarantee the personal data protection of the victims and protection of their status and privacy as victims. As a result, the human trafficking victims do not use active employment measures. This affects the reintegration of the victims into the community after leaving the shelter and increases the possibility of their re-entering the human trafficking chain.<sup>12</sup>
15. Detaining migrants to ensure their presence as witnesses in criminal proceedings is arbitrary and illegal,



and remained to be the main reason for **immigration detention**. The detainees did not always understand the reason, the duration of their detention and sometimes the reasons for their detention were not explained in a language understandable to them. Considering this and that some of them were quarantined (COVID related) for 15 days before being brought to testify, these persons were denied access to effective legal aid. There were cases when **unaccompanied children were used as witnesses in criminal proceedings** against the smuggler. The standard operation procedure for unaccompanied child does not allow for a child to be used as a witness in a criminal proceeding, with the exception of when the child is the only witness in that criminal proceeding. In 2021, the number of detained children in all locations was 85, which is alarming.<sup>13</sup> In most cases, legal guardian was appointed to the unaccompanied detained children. However sometimes there was a delay in the timely appointment of a guardian.<sup>14</sup> Unaccompanied minors run a significantly increased risk of being trafficked, however)

### Technical (administrative) resources

16. All institutions handling human trafficking cases, report **insufficient human resources** as one of their main problems. In addition, the institutions sometimes have problem with other resources such as access to vehicles, to be able to perform their regular tasks. Some are complementing their operational needs with donations from international organizations.
17. The police and prosecutors **did not have adequate resources and equipment** to conduct proactive investigations. As a result, authorities relied almost exclusively on victim testimony with little corroborating evidence. The Organized Crime and Corruption Prosecution Office, with only 10 prosecutors in the office to handle all cases under its jurisdiction, lacked sufficient resources to handle all cases.<sup>15</sup> The Task Force does not have adequate resources (staff and budget) to implement reactive and proactive trafficking investigations, as appropriate in accordance with the standard operating procedures in force. The problem with insufficient human resources that are also shared by the Centers for Social Work and among labour inspectors. The police reports complementing their operational needs with donations from international organizations and institutions, and the labour inspectors are using resources from other state institutions to help them perform some of their duties.<sup>16</sup>
18. The **capacity** of the anti-trafficking system is heavily **influenced** by a **high turnover of staff, as well as lack of knowledge and sensitivity**. The local police officers, usually the first point of contact with the victim, lack an understanding of human trafficking. As a result, it did not consistently notify the Task Force of potential trafficking cases. Some professionals lack the sensitivity to deal with human trafficking victims and/or don't have the knowledge of the indicators to identify victims of human trafficking. Some labour inspectors keep who their focus limited within their mandate to inspect, assess, and report breach of employment legislation. Some public prosecutors ask the victim to repeat their testimony or victims are sometimes forced to give a testimony, even though they are not ready. For example, if all professionals have gathered, and they have a camera and room available to take the testimony, then they force the victim to give a testimony regardless of if s/he is ready to do so. In this way victims are pressured, revictimized, they close for cooperation and the testimony is of poor quality and can have a major impact on the case leading to unsuccessful prosecution of the alleged perpetrator.
19. **There is a need have more administrative staff to support the work of the National Commission to Combat Human Trafficking and Illegal Migration** (hereafter: the Commission). The Commission is a multi-agency body, and it's work is supported by civil society and international organizations, and it's led by the national coordinator. The Commission is the highest coordination body responsible for monitoring the situation with human trafficking and illegal migration and coordination of activities. There is one person, employed within Ministry of Interior, that provides administrative support and is responsible for communication and coordination with all partners, monitoring of projects and managing the implementation of the national strategy and action plan.

#### IV. PROGRESS IN THE CHAPTER

20. In 2021, the Parliament adopted a new **Law on Prevention and Protection from Violence Against Women and Domestic Violence**.<sup>17</sup> The new Law covers women victims of all forms of gender-based violence, foresees a reintegration program that allows for any victim of violence to access reintegration, and the multi-sectoral teams' competences are extended to all forms of gender-based violence, not limited to domestic violence only.<sup>18</sup>
21. In 2021, the National Commission adopted a new **National Strategy and National Action Plan (2021-2025)**. The strategy is structured around five strategic goals: the institutional framework, prevention, identification and referral, direct assistance and support, and efficient detection and prosecution.
22. In 2021, the National Commission adopted a **decision to establish an Operational team for coordination and management of human trafficking cases**. This body has been established in order to do the formal identification of victims of human trafficking, and to coordinate and monitor individual cases.
23. In 2021, the MoLSP adopted a **new Rulebook standardizing the social service provision** in a temporary residence. With this Rulebook, the MoLPS determined the prices of social services provided within a place of temporary residence, that covers the services provided in the Center for victims of human trafficking.<sup>19</sup>
24. In 2022, **the State Labour Inspectorate (SLI) and the Ministry of Internal Affairs (MIA)** developed a Memorandum of Understanding (MoU) that will regulate the cooperation and referral between the SLI and MIA.
25. In 2022, the Parliament adopted the **Law on the Payment of Monetary Compensation to Victims of Criminal Offences**, including victims of trafficking and gender-based violence. The law provides for compensation for the direct and the indirect victims, such as children, parents, grandparents etc. It is expected that some of the obstacles to access compensation will be solved.<sup>20</sup>
26. Since 2016, there is a **Program run by the Ministry of Justice** for compensation of children who are victims of violent crimes, including human trafficking. In 2021, the Ministry of Justice allocated one million denars to the Programme, and four children were paid compensation at a total cost of 1,500,000.00 denars, one of which was a victim of human trafficking.<sup>21</sup> It took six years for the victim of human trafficking to receive the compensation that was based on a court verdict from 2015.<sup>22</sup>
27. In 2022, an **Operational team for coordination and management of human trafficking cases** was established. This body has been established in order to do the formal identification of victims of human trafficking, and to coordinate and monitor individual cases. It is comprised of government and CSOs representatives.
28. In 2021, six **people were cared for at the Center**, four of which were newly identified, two children (citizens) and two adults (foreigners), and 2 children extended their stay from the previous year. In 2022, 9 persons were accommodated in the center. The average length of stay is from one week to 10 months.<sup>23</sup>
29. Open Gate/La Strada provides shelter services as a state licenced service. As such it should receive **state funds to cover the shelter's operational costs**. In 2021, Open Gate/La Strada did not receive funds from the Government to cover the operational costs. In 2022, the total amount received was 900,055.00 Macedonian Denars, an amount to cover 8 percent of the cost for running the shelter. The funds were transferred to Open Gate/La Strada in July 2022.
30. **Agriculture, construction, and animal husbandry** represent areas/sectors where the **highest risk for labor exploitation** has been identified. Majority of the seasonal workers are hired in the agricultural sector. This is a high-risk sector for human trafficking because of the nature of the work, verbal contracts, seasonal workers are isolated when performing their work, hiring of labor without complying

with the national employment regulations for seasonal work, etc. In 2021 and 2022, the state labour inspectorate conducted a total of 514 inspections in the agriculture sector. They did not identify any victim of human trafficking.<sup>24</sup>

31. The **mobile teams were reactivated** in august 2021, with a donor support. They continued with a proactive identification and field work.

Table 1: Mobile teams, number of assisted and potential victims of human trafficking

| Description  | 2021 |
|--|------|
| Total number of assisted persons                       | 260  |
| Total number of men                                    | 88   |
| Total number of foreigners                             | 15   |
| <b>Potential victims of human trafficking</b>          |      |
| Total number of potential victims of human trafficking | 67   |
| Total number of men                                    | 12   |
| Total number of foreigners                             | 2    |

Source: National Commission Annual Report 2022

32. The CSO Macedonian Young Lawyers Association is a member of the mobile teams. In 2021, it provided legal aid and information to 6 victims of human trafficking, and to 55 potential victims of human trafficking.<sup>25</sup>
33. In 2021, a total of ten individuals were identified as **presumed or potential victims of human trafficking**, out of whom 50 percent were children. The majority or eight were female. Among the child potential victims of human trafficking two were unaccompanied children. Data regarding the form of exploitation was not available for all cases.<sup>26</sup>
34. In 2021, a total of 48 individuals were identified and **officially recognized as victims of human trafficking**, out of whom majority were adults, male, foreign national trafficked for the purpose of labour exploitation. The children who were trafficked for the purpose of non-sexual forms of exploitation were forced to begging. The children who were trafficked for the purpose of sexual and labour exploitation were forced into marriage.<sup>27</sup>

## Concrete field examples

### Case 1: Trafficking for the purpose of sexual exploitation (link to story [here](#) and [here](#) )

**Description of the case:** When she was five, her parents forced her to beg. Their parental rights were terminated, and she entered the state protection system. First, she was placed in a foster family. The first foster family emigrated, and she was moved to another foster family. The latter physically and emotionally abused her and forced her to work. In 2017, when she was twelve years she was identified as victim of trafficking and placed in the shelter for twenty days. After the shelter, she was moved to a state care institution. While in state care, she becomes again victim of human trafficking and in February 2018, she was again placed in the shelter. To date she is still living in the shelter.

**What went wrong:** - After all options for accommodations were exhausted and unsuccessful, she is living for more than four years in the shelter. - She had more than eight guardians from the Center for Social Work, making it difficult to build trust and continuity in service provision. - She needs clinical counselling and therapy, but the state has not made it available to her.

**What went well:** - Fast reaction from the public prosecutors, victim identified in February, in April she was called in to give a statement. - Sensitive and knowledgeable prosecutor that invested time to gain the victim's trust, gather evidence from various sources (police, guardians, CSOs, etc.) and invited a person of trust to support the victim during giving statement. – One interview with the victim conducted in the public prosecutor's office where social worker/guardian, psychologist, lawyer, and a person of trust was present.

### Case 2: Trafficking through forced marriage (link to story [here](#))

**Description of the case:** She lived with a mother who was sick and father who was alcoholic, physically abused her and forced her to beg. The father sold her to a family where she was sexually abused and forced to work in the home. With the help of a neighbour, she reported the case to the police. When she was fourteen, she was identified as victims of human trafficking and placed in the shelter. After the shelter she was placed in a small group home, and when she became eighteen, she left the state care system.

**What went wrong:** - It took more than one year for the victim to be called to give a statement before the prosecutor. – The prosecutor collected evidence only to prosecute the father, so when the child decided to only testify for the family where she was forced married, the prosecutor closed the case. None was prosecuted. Open Gate/La Strada filed a complaint to the Chief of Organized Crime and Corruption Prosecution Office. To date there is no answer on this case.

**What went well:** - The victim was actively participating in all procedures and cooperating with the authorities. More than one year after she left the shelter, the victim was in contact with Open Gate/La Strada. In this time, she received advice, support regarding education and employment, support to contact institutions, etc. This continuous support and contact with the CSO, made her better prepared and willing to cooperate with authorities. – The public prosecutor came in the place of residence of the child to take the statement.

### Case 3: Cybersex trafficking (link to story [here](#))

**Description of the case:** In 2022, the first victim of cybersex trafficking was identified. The grooming of the victim started when she was nine and half years old and she was fourteen when the case was discovered. The victim and the trafficker met online. The trafficker had a fake online profile, as a girl. They became online friends, and in the course of friendship they exchanged photos, which later were used by the trafficker to force the victim into cybersex trafficking. The trafficker was a part of a Balkan network of traffickers, and he recorded and/or streamed her exploitation.

**What went well:** - Cross-border cooperation between the police in the region to investigate the case and collect evidence. – Police awareness on cyber-trafficking. – Due to the experience and the knowledge of the police inspector who interviewed the victim, the victim recognized the police inspector as person of trust and confide to her. – The gender of the police inspector who interviews the victim, was the same as the victims.

## V. RECOMMENDATIONS

- 33. Continue with the good practice of CSOs contributing in the making of legislation/policy and participate in its implementation.** CSOs have formal and informal role in prevention, identification, and protection of human trafficking victims. They contribute towards policy and law development through their participation in the work of the Secretariate and the Trafficking in Children Subgroup of the National Commission. The CSOs provide training to professionals, prevention lectures in primary and secondary schools, and raising awareness activities etc. The CSOs have a formal role in the identification and protection of victims of human trafficking through their participation in the mobile teams and they are also foreseen as a member in the yet-to-be established new Operational Team. The CSO Open Gate is a state-licenced service provider, and they are managing the only shelter in the country. CSOs contributed to preparing the new Law on Prevention and Protection from Violence Against Women and Domestic Violence, the new Law on the Payment of Monetary Compensation to Victims of Criminal Offences and the new Strategy and Action Plan.
- 34. Invest in effective access to compensation.** Simplify the procedure to claim and receive compensation and shorten its duration so victims can receive compensation in a reasonable time.
- 35. Free medical services for all victims:** The state needs to remove the legal obstacles that prevent victims accessing free medical help. The state needs to provide for free-of-charge psycho-social support and medicine.
- 36. Ensure sustainability of the mobile teams:** The mobile teams are considered as a good practice in proactive identification and cooperation between civil society and government, however they are dependent on donor support. The Government needs to invest in sustainability of the mobile teams by allocated state funds for its functioning.
- 37. Expand the current shelter services:** Increase and diversify the capacity to accommodate victims of human trafficking, by providing specialized services depending on the age or the gender of the person and making alternative care services such as foster care and small group homes available to victims of human trafficking. Ensure that foreign victims of trafficking have access to adequate accommodation services.
- 38. Ensure continuous funding for the shelter:** The MoLSP should ensure that the funding for the functioning of the shelter is stable and available every year, at the beginning of the year, and it is sufficient to cover all operational costs.
- 39. Improve access to active employment measures:** The current system of the employment agency does not guarantee the personal data protection of the victims and protection of their status and privacy as victims. Victims should be given a priority access to active employment measures, while guaranteeing their privacy and protection of data
- 40. Use of detention for unaccompanied minors should be discontinued:** The state should protect the rights of children and use alternatives care services, such as foster care and group homes.
- 41. Ensure timely appointment of legal representative** to guarantee access to legal aid for victims of human trafficking.
- 42. Advance identification efforts:** Introduce a victims-center approach to identification and treatment of victims of human trafficking.

## VI. ANNEX: RESOURCES CONSULTED

<sup>1</sup> [https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-10/eu\\_accession\\_process\\_clusters%20%28oct%202022%29.pdf](https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-10/eu_accession_process_clusters%20%28oct%202022%29.pdf)

<sup>2</sup> [https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-10/eu\\_accession\\_process\\_clusters%20%28oct%202022%29.pdf](https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-10/eu_accession_process_clusters%20%28oct%202022%29.pdf)

<sup>3</sup> Gender Equality Platform, 2022, Shadow Report on the Implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence in North Macedonia, available [here](#)

<sup>4</sup> Interview with key stakeholders, November 2022

<sup>5</sup> <https://globalaccesstojustice.com/global-overview-north-macedonia/>

<sup>6</sup> U.S. Department of State, 2021, Trafficking in Persons Report: North Macedonia, available [here](#)

<sup>7</sup> Interview with key stakeholders, November 2022 and U.S. Department of State, 2021, Trafficking in Persons Report: North Macedonia, available [here](#)

<sup>8</sup> Interview with key stakeholders, November 2022 and U.S. Department of State, 2021, Trafficking in Persons Report: North Macedonia, available [here](#)

<sup>9</sup> U.S. Department of State, 2021, Trafficking in Persons Report: North Macedonia, available [here](#)

<sup>10</sup> U.S. Department of State, 2022, Trafficking in Persons Report: North Macedonia, available [here](#)

<sup>11</sup> Open Gate/La Strada, 2020, Предизвици во идентификацијата, заштитата и реинтеграцијата на жртвите на трговијата со луѓе [The challenges in identification, protection and reintegration of victims of human trafficking] and Interview with key stakeholders, November 2022

<sup>12</sup> Open Gate/La Strada, 2020, Предизвици во идентификацијата, заштитата и реинтеграцијата на жртвите на трговијата со луѓе [The challenges in identification, protection and reintegration of victims of human trafficking] and Interview with key stakeholders, December 2022

<sup>13</sup> Macedonian Young Lawyers Association, 2022, Состојбата на азилот во Република Северна Македонија во 2021 година [Situation with Asylum in North Macedonia for 2021]

<sup>14</sup> Macedonian Young Lawyers Association, 2021, Immigration detention in North Macedonia expressed in numbers

<sup>15</sup> Interview with key stakeholders, November 2022 and U.S. Department of State, 2021, Trafficking in Persons Report: North Macedonia, available [here](#)

<sup>16</sup> Interview with key stakeholders, November 2022

<sup>17</sup> National Network to End Violence against Women and Domestic Violence, 2021, Baseline study report on measuring satisfaction of the beneficiaries with services received in CSW, available [here](#)

<sup>18</sup> National Network to End Violence against Women and Domestic Violence, 2021, Baseline study report on measuring satisfaction of the beneficiaries with services received in CSW, available [here](#)

<sup>19</sup> National Commission to Combat Human Trafficking and Illegal Migration, 2022, Annual Report for 2021

<sup>20</sup> <https://www.lastradainternational.org/news/new-compensation-law-adopted-in-north-macedonia/>

<sup>21</sup> [https://ener.gov.mk/files/propisi\\_files/ria1/1\\_1317108951Mart%202022%20Finalen%20ZPD.doc](https://ener.gov.mk/files/propisi_files/ria1/1_1317108951Mart%202022%20Finalen%20ZPD.doc) and U.S. Department of State, 2021, Trafficking in Persons Report: North Macedonia, available [here](#)

<sup>22</sup> <https://nezavisen.mk/zatvoreniot-krug-na-elena-najdramatichniot-slučaj-od-trgovijata-so-deca/>

<sup>23</sup> National Commission to Combat Human Trafficking and Illegal Migration, 2022, Annual Report for 2021


<sup>24</sup> Macedonian Young Lawyers Association, 2022, Сезонската работа - плодна почва за трудова експлоатација [Seasonal Work – fertile land for labour exploitation], available [here](#)


<sup>25</sup> Macedonian Young Lawyers Association, 2021, Annual Report, available [here](#)


<sup>26</sup> Source: Ministry of Internal Affairs, November 2022


<sup>27</sup> Source: Ministry of Internal Affairs, November 2022



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