

REPORT OF THE OMBUDSMAN TO THE COMMITTEE ON RIGHTS OF PERSONS WITH DISABILITIES

To: Human Rights Council and Treaty Mechanisms Division
Office of the United Nations High Commissioner for Human Rights
HCHR-Palais Wilson, 52 rue des Pâquis
CH -1211 Geneva 10
Switzerland

To : Catherine I. Pedreros P. (Ms.)
Human Rights Officer
Office of the United Nations High Commissioner for Human Rights
E-mail: cpedreros@ohchr.org
Tel: +41 22 917 9309
Fax: +41 22 917 9034

I. Introductory remarks

The provision of special protection for disabled persons and conditions for their inclusion in the social life is a right guaranteed by the 1991 Constitution of the Republic of Macedonia, which is further implemented through the competence and the right to protection of children and persons with disabilities (persons with disabilities) the Ombudsman, in the 2003 Law on the Ombudsman, or additionally through the amendments to the Law on References 2009 and 2016. Namely, the possibility was created for the establishment of a special unit that will work on the promotion, prevention and protection of the rights of children and persons with special needs, that is monitoring of the respect and realization of the rights of children and persons with special needs, prescribed in international agreements , the laws and bylaws of the Republic of Macedonia.

As an institution that has a long standing practice of dealing with the protection of basic human rights and freedoms, the Ombudsman through this Information aims to contribute to the consideration of the implementation and implementation of the Convention on the Rights of Persons with Disabilities.

In the information we present the situation in the period 2012-2017, presented in the annual reports of the Ombudsman, through statistical data on the received complaints and related work in the area of protection of the rights of the citizens, more precisely the number of initiated procedures for protection of the rights of the children and persons with disabilities, when they are injured by state administration bodies, and by other bodies and organizations that have public authority.

At the same time, the Information presents conclusions from the monitoring of the general conditions related to the rights of the children, that is, the persons with disabilities, and accordingly recommendations from the Ombudsman, which are an integral part of the Special Reports and Information, were given after the researches conducted in the mentioned period. At the moment of submitting this information, a Report on the conducted research on the inclusion of children with disabilities in preschool institutions, ie kindergartens is in preparation.

The Ombudsman of the Republic of Macedonia sincerely hopes that this information will help in the preparation of the final report on the Republic of Macedonia regarding the implementation of the Convention on the Rights of Persons with Disabilities. At the same time, we inform you that additional information on the work of the Ombudsman, including the Department for protection of the rights of children and persons with disabilities can be found on our website www.ombudsman.mk.

II. About the institution Ombudsman

The Ombudsman, in accordance with the Law on the Ombudsman, pays special attention to the protection of the rights of children and persons with disabilities, as well as the exercise of their rights guaranteed by the Constitution, laws and ratified international agreements. The constitutional provision according to which "the Republic provides special protection to the disabled persons and conditions for their inclusion in the social life" has been operationalized in the 2003 Law on the Ombudsman, and more specifically in the amendments and supplements to this Law in 2009, through the established competence of the Ombudsman the Ombudsman to

provide special protection of the rights of children and persons with special needs through a special department for protection of the rights of children and persons with special needs. Pursuant to the amendments to the Law on the Ombudsman in 2016, the Ombudsman, as a body of the Republic of Macedonia, promotes and protects the constitutional and legal rights of the citizens and all other persons (Article 2), ie it prevents and provides special protection of the rights of children and persons with disabilities (Article 11-b) of the Law on Amending the Law on the Ombudsman ("Official Gazette of the Republic of Macedonia" No. 60 / 03,114 / 09,181 / 16,189 / 16,35 / 18).

It should be noted that the Ombudsman acts upon a complaint submitted by the citizens, which should contain the circumstances, facts and evidence upon which the allegations of violation of the right are presented, and at the same time he can act on his own initiative for violation of the constitutional and legal rights of a large number of citizens, juveniles, impotent persons, persons with disabilities, which does not require the consent of the person / persons whose rights are violated.

When filing the complaint, the language in which it is submitted does not constitute an obstacle to communication with the Ombudsman. It can be communicated with it except in the official language and alphabet and in the language and alphabet of any community that lives in the Republic of Macedonia, and the Ombudsman corresponds to the Macedonian language and its Cyrillic alphabet, as well as in the official language and alphabet used by the applicant of the complaint. The complaint that initiates the procedure does not have the prescribed form, it can be submitted in writing, orally on the record or electronically. The complainant is exempt from paying fees for the procedure before the Ombudsman.

If during the procedure the Ombudsman establishes and concludes that certain actions or acts violate the rights of the citizen or there is discrimination on grounds of disability or other basis, he can give recommendation, suggestion, opinion and suggestion to the state administration bodies, the units of the local self-government and to bodies and organizations with public authorizations. The bodies should respect the recommendations, suggestions, opinions and suggestions of the Ombudsman, and if they are not respected, the Ombudsman has a legal opportunity to inform the competent minister, the Government or the Parliament of the Republic

of Macedonia, and can additionally present him publicly in public a competent authority or an official who has committed a violation of the right of the citizen.

The Department for protection of the rights of children and persons with disabilities acts in accordance with the legal competences, in the protection of the constitutional and legal rights of the citizens by the state administration bodies, the organizations that have public authorizations, the local self-government bodies and the public institutions and services by submitting on complaints. At the same time, the department promotes human rights and freedoms, and points to the need for their protection, conducts appropriate research, educational activities in schools and other institutions for care and protection of children and persons with disabilities.

Through direct meetings with children and persons with disabilities and their parents, it contributes to greater awareness and knowledge of the rights, methods and mechanisms for their protection, prepares, prints and distributes brochures and flyers related to their rights, and participates in workshops and conferences , both in the country and abroad, which are addressing issues related to the exercise of the rights of children and persons with disabilities.

In the realization of the aforementioned, the Department for Protection of the Rights of Children and Persons with Disabilities in the Ombudsman cooperates with the civil sector, ie numerous civic associations, as well as other domestic and international organizations, including with the Ombudsman institutions in the region and wider in the field of protection of the basic freedoms and rights of the citizens, ie protection of the rights of children and persons with disabilities.

Description of the situation

The Ombudsman actively monitors the actions of the competent bodies in accordance with the requests of the citizens regarding the realization and protection of the rights of children and persons with disabilities, and therefore as a contribution to solving the problems of this vulnerable category to the competent line ministries and other bodies state administration, the units of the local self-government and the public estates and services for protection and care of these citizens submit all their research and reports on the implemented activities related to the rights of children

and persons with disabilities, in which besides the established situations in different areas recommendations and guidelines are given to promote their status and purposeful integration into society.

The small number of complaints submitted by children and persons with disabilities at the Ombudsman prompted the Ombudsman to review the situation with the exercise of the rights of this vulnerable and marginalized group, given the awareness that their acceptance, inclusion and integration in society is not at a satisfactory level . This conclusion of the Ombudsman arises from the numerous surveys, the monitoring of the situation in the society, as well as the meetings with the children and the persons with disabilities, their parents and the associations of citizens who work diligently with this group of citizens. In this context, the statistical data submitted to the Ombudsman in the period 2012-2017 shows the number of 60 complaints in which the applicants requested the protection of the rights explicitly as persons with disabilities, and the content of the same is indisputable the conclusion that the problems are related to a larger number citizens with the same disability.

Regarding the number of complaints related to the rights of children, including the rights of children with disabilities, the total number of complaints in the period 2012-2017 is 784, for protection of rights from different spheres.

Within the subject matter, the Ombudsman constantly points to the prohibition of discrimination on any grounds, including on grounds of disability, referring to domestic and international regulations, indicating that there is no visible progress in the realization of the rights of children and persons with disabilities and their inclusion in society. At the same time, there is lack of a multidisciplinary approach and inter-ministerial cooperation to improve the access and realization of the rights of children and persons with disabilities in several areas, and stereotypes and prejudices among others towards this category of citizens are still present, making them more vulnerable and left on the margins in the society.

Article 5, 6 and 7: Equality and non-discrimination / Women with disabilities / Children with disabilities

The right to equality and the prohibition of discrimination, guaranteed by the Constitution, have been operationalized in the Law on Protection and Prevention against Discrimination, which in Article 3 - Basis of discrimination prohibits any direct and indirect discrimination, incitement of discrimination and assistance in discriminatory treatment among others, and based on sex, age, mental and physical disability, or any other basis provided for by law or by ratified international agreement.

The rights of women / girls with disabilities, that is, their possibilities are not regulated by specific provisions in the Law on Prevention and Protection against Discrimination, nor in the Law on Equal Opportunities for Women and Men. Their rights are regulated in other legal solutions, in which the principle of prohibition of discrimination is expanded, and with the National Strategy for Equality and Non-Discrimination based on sex, age, ethnicity, mental and physical disability 2005-2015, the country is strategically oriented towards realization the right to equality and the creation of equal opportunities. However, in practice, the guarantee of non-discrimination against children and women with disabilities is more declarative, which is the conclusion of the parents / guardians of children with disabilities from the immediate meetings with the Ombudsman.

Namely, the perception of the parents / guardians of children / persons with disabilities is that girls and women with special needs feel the discrimination on several levels: on the basis of their gender, disability and ethnicity. In that context, continuous activities are needed in this area, and affirmation of the mechanisms for protection against discrimination, as well as measures and activities for greater inclusion of the children / persons with disabilities themselves and their parents / guardians, in order to overcome the prejudices and difficulties for the unhindered access and exercise of rights in different areas, ie their equal treatment with others.

During 2017 parents of children and persons with disabilities through peaceful protests requested changes and amendments to the legal and by-laws for persons with disabilities, and the Ombudsman initiated a procedure on his own initiative in the case. In addition, to the Minister of Education and Science, the Minister of Labor and Social Policy and the Minister of Health submitted that they should seriously consider the requests of the parents of children and persons with disabilities who refer to the

improvement of the exercise of the rights to social protection, education health care and insurance, through amendments and supplements to the law and by-laws, in order to create conditions for exercising the rights, without discrimination, as citizens of this country.

The Ombudsman requested that conditions be provided for the full enjoyment of the rights and freedoms of children / persons with disabilities, and their full participation in society, measures to ensure accessibility and access to physical, social, economic and cultural environments, as well as access to services in the field of health, education, or the necessary information, in order to enable them to fully enjoy the human rights and fundamental freedoms, which will significantly contribute to compensating for the social and other disadvantages of these persons in the society.

Article 8 – Raising awareness

The Department for protection of the rights of children and persons with disabilities in the Ombudsman, in order to promote the rights of these citizens, to inform them about the Ombudsman Institution, the mandate, the role and the competences of this body, and to introduce them to the ways of their address, as well as to hear the thoughts of this group of citizens about access to rights in various spheres of social life, in the period March-April 2016, realized educational and promotional meetings with children / persons with disabilities and their parents bodies / caregivers, that is, the Associations of people with special needs¹.

The first informative meeting was held in March 2016 in the premises of Dare Dzambaz - Skopje, with the presidents of most organizations and bodies for persons with disabilities, such as: "National Council of Disabled Organizations of Macedonia", "National Union of the Blind of Republic of Macedonia ", " National Association of Deaf and Hard of Hearing ", " National Union of Persons with Physical Disabilities of Macedonia Mobility Macedonia ", " Republic Center for Support of Persons with Intellectual Disability-Communication ", " National After this meeting, he had meetings with parents of children and persons with cerebral palsy with parents of children with

¹ Information on the rights of children with special needs (children and persons with cerebral palsy, Down syndrome, intellectual disability, blind and sleeping people), from the perspective of children / persons with disabilities and their families, August 2016, Special Reports of the Ombudsman.mk

Down syndrome members of the association "Trisomnia 21", parents whose children attend the "Center" Children's Day with intellectual disability "Poraka" - Skopje, as and members of the Association of Blind and Blind People of the City of Skopje.

This initiative of the Ombudsman for meetings with parents of children / persons with disabilities, attended by people with different types of disabilities, was hailed and positively assessed as an opportunity to openly express the perceptions of the difficulties they face in access to rights and the treatment of others.

All unanimously agreed that persons with disabilities, whether they are referred to as "persons with disabilities", "persons with disabilities" or "persons with disabilities", continue to be on the margins of society, and are on a daily basis fighting to prove that their needs must be taken into account in the context of human rights and freedoms. In this context, the competent authorities propose through continuous campaigns, trail tables or other types of activities to contribute to the promotion of rights, raising awareness of needs and equal access to the rights of this category of citizens.

In this context, the expectations and demands of the parents of children and persons with disabilities are nothing more than raising the awareness of their existence and the necessary solving of the problems, promoting the rights of persons with special needs and ensuring the conditions for full enjoyment of human rights which are not a privilege. It is also necessary to perceive persons with disabilities and their active involvement as citizens of this society who have the same right as others to live, create a family and raise their own children, the right to education and work, participate in social life. for which it is necessary to create an environment without barriers and encouraging to live independently, contributing to society in every aspect, bearing in mind the equal dignity and value of every human being.

Article 9 – Accessibility

The exercise of this right for persons with disabilities is difficult, both in terms of access to services and access to a particular facility. The physical environment is still not sufficiently accessible for children and persons with disabilities. Most streets, means of transport and public institutions are not accessible to persons with disabilities, and due to the architectural barriers in the environment in which people

live, they are unable to move unaccompanied by another person, but are also unable to use free transport if not submit a consilient opinion about their companion.

The Ombudsman welcomes the installation of auxiliary paths that will significantly facilitate the movement of persons, which will be functional and blind people will be able to fulfill their obligations in an easier way, and contribute to their interaction in the society.

For children with disabilities, inclusive playgrounds are set up in several municipalities, and it is recommended to continue building such places for the recreation of children with disabilities in several municipalities.

In the Official Gazette of the Republic of Macedonia, under No 6/2016, a Program for reimbursement of funds paid as customs duties, value added tax and excise for the purchase of a passenger car for persons with at least 80% disability in the lower limbs, persons with moderate, severe and profound intellectual disability, for completely blind people with a companion and for completely deaf people for 2016.

The Ombudsman, from the practical handling of submitted complaints, found that parents of children with disabilities, who move with the help of a wheelchair, in accordance with the needs of the children, are forced to additionally incorporate elements in the vehicle that they use exclusively for the needs of their children, that is yes carry out the adjustment of the vehicle for safe transport (installation of a ramp and appropriate belts). However, for these incentives, although they are additionally paid by their own funds, they are not refunded, in accordance with the aforementioned program, which gave the possibility for refunding funds for funds paid as customs duties for the purchase of a passenger car. In doing so, the Ministry of Labor and Social Policy justifies the refusal of the requests on the grounds that the purchased passenger vehicle is with a higher value of 10.000,00 eva in denar value, which does not meet the requirements of Article 213-a of the Law on Social Protection, as and criteria in the Program for reimbursement of funds paid as customs duties, value added tax and excise duty for the purchase of a passenger car which refers to persons with at least 80% disability in the lower limbs, persons with moderate and severe e a patchwork intellectual disability, for completely blind people with a companion and for completely deaf people. The parents of these children

informed the Ombudsman that the car market does not have a vehicle that costs up to 10,000 euros, and meets the criteria for carriage of a person in a wheelchair, and that the roof of the vehicle should have a minimum height of 140 cm, which in some way obliges parents to find a vehicle that meets these standards for safe and secure use for the needs of children in a wheelchair.

It therefore follows that Article 213-a of the Law limits the amount when purchasing the vehicle (up to € 10,000), and the actual amounts for the purchase of a vehicle for transporting a child / person with a wheelchair are not taken into account, and for that a sum may be purchased for a vehicle transporting a person with another disability, which is mobile. Having in mind the foregoing, the Ombudsman, having in mind the Convention on the Rights of Persons with Disabilities, asked the Ministry of Labor and Social Policy to conduct a market research of vehicles and to determine the factual situation and to consider the possibility to take measures in the direction of correction of the criterion of 10,000 Euros in MKD equivalent for vehicles that will transport persons in a wheelchair, but also the maximum refund limit of 180,000 MKD. per purchased vehicle.

In addition, he pointed out that the vehicles that refer to the needs of children in a wheelchair as passengers need a supplement which is additionally paid, which will enable the child to be loaded into the cart (by installing a ramp, elevator and etc.) and appropriate belts (or similar) for fastening the cart, but also suitable belts (belts) so that they can be safely transported, and suggested that the Ministry of Labor and Social Policy should consider the possibility of a complete refund of funds, which would mean amending and supplementing the Law for social protection.

Having in mind the right to accessibility, the Ombudsman has indicated to the competent authorities that it is necessary to respect and enforce the legal regulations in a consistent manner so that every person with a disability can move smoothly and be orientated in the space by providing ramps, lifts, sound and light signaling, appropriate sidewalks, etc., as well as undertaking measures for adjusting the buses with access ramps for persons with physical disabilities in order to increase accessibility to the means of public transport of these persons.

In addition to the aforementioned, having in mind that the issue of the availability of information to be provided in an easy, understandable manner and format, in accordance with the disability of the persons, the Ombudsman emphasized the role of the media in raising public awareness by informing the persons with disability respecting the dignity of these people, as well as greater engagement of the bodies / institutions at central and local level for undertaking specific actions for informing persons with disabilities, but also for the public on the rights and the needs of these people, respect for these rights and greater social awareness of their existence and the need for inclusion of all kinds.

Otherwise, the Report on the Survey conducted by the Ombudsman during 2017, regarding the accessibility of schools, concluded that public high schools do not meet the necessary conditions for providing physical accessibility. Namely, the analysis of the data obtained from 92 out of 107 secondary schools showed that in 55 secondary schools (53%) there is an access ramp to the entrance of the school building, 15 (14%) have adapted classrooms and other interior premises, or there is no external lift entrance to the school building, and only 13 (13%) have adapted (accessible) toilets. Furthermore, 2 schools (2%) have a built-in internal elevator for moving between floors, 15 (14%) answered that no special measures were taken in this direction, while 4 (4%) answered another, without specifying what it refers to .

From the immediate visits, we noticed that when it comes to accessibility, the entrance of the schools is accessible, but not the inner part. Although there is an access ramp at the entrance, it does not benefit the students because it does not meet and adheres to the accessibility standards. In addition, students using a wheelchair need support that is usually provided by their parents.

The accessibility of the toilet in many schools as a concept is not sufficiently known. Adjustment consists of mounting a VC shell, and the largest part of the school's toilets are "cufflinks". The lack of accessible toilet makes it difficult for students to stay in school and imposes the need to involve a parent, or carry "prevention" so that the student can sit at all hours.

The most common adaptation when it comes to physical accessibility, which schools provide is maintenance of all classes in a classroom located on the ground floor

The situation is even more unfavorable when it comes to the availability of accessible (adapted) pedagogical devices and teaching aids. Namely, 74 schools (80%) do not have such equipment that facilitates the active involvement of students with disabilities, 12 schools (13%) said that they have adapted didactic materials. Most often, these are schools in which defectologists produce tailor-made materials for individual work with students, ie schools in whose career centers is provided with assistive information technology.

Article 12 - Equal recognition before the law

According to the Constitution of the Republic of Macedonia², citizens are equal before the Constitution and the laws, and with the operationalization of this constitutional regulation in the Law on Prevention and Protection against Discrimination, discrimination on the basis of disability (mental and physical disability) of the citizens is clearly proscribed.

Following the situation with the exercise of the right to education of children with disabilities in primary and secondary education, the Ombudsman concludes that the key acts - the Law on Primary Education³ and the Law on Secondary Education⁴ explicitly prohibits discrimination based on gender, race, color skin, national and social origin, political and religious beliefs, property and social status, but does not predict disability as a basis for discrimination.

The analysis of the legal regulation governing the right to education, from the aspect of equality before the law, shows that Article 33, paragraph 1 of the Law on Secondary Education, ensures the right to enroll in a secondary high school is provided for "regular students who have finished primary education"; Article 34, paragraph 1, provides for the right to enroll in secondary vocational school for "full-time and part-time students who have completed primary education". Students with disabilities are not mentioned at all in the provision regarding the enrollment of pupils in regular secondary education.

Furthermore, Article 39, paragraph 1, stipulates that "in secondary education for students with special educational needs, students are trained according to programs for appropriate occupations, that is educational profiles or for work training". Additionally, Article 40, paragraph 1, stipulates that "secondary education for students with special educational needs includes students who are registered and distributed according to the type and degree of developmental disabilities".

When these two provisions are looked at together, children and young people with a disability who have adequate documentation of their disability appear to refer to special secondary schools. When considering that special secondary education is training its students for a limited number of professions, it can be considered that

² Article 9 from the Constitution of R.M

³ Article 2 paragraph 2 from the Law on primary education

⁴ Article 3 paragraph 3 from the Law on secondary education

these solutions encourage the segregation of students with disabilities, reducing the opportunities these students can provide in the future for employment in the open labor market. Therefore, improvements in two directions are needed - children with disabilities to enroll more in regular education, which also implies the need for a differentiated educational program, and on the other hand it is necessary to modernize the curriculum and educational programs under which teaching is carried out in special schools.

The Law on textbooks for primary and secondary education⁵ stipulates that the textbook is the primary teaching tool and source of knowledge for achieving the educational goals set in the curriculum for elementary and secondary education. None of the articles in the Law stipulates that textbooks should be made in a format that will be available to all students including electronic textbooks in an accessible format, textbooks on Braille, readable textbooks etc, according to the needs of children with disabilities. In the Law on Vocational Education⁶, none of the articles stated that both students with disabilities have the right to vocational education and training, or that adjustments should be taken regarding the physical accessibility of vocational education and training facilities, preparation of individual education plans for vocational education and training, availability of learning materials or customized safety equipment. And in the Law on Student Standards⁷, especially in the articles regarding the student houses, gives the impression that there are student houses for students with special educational needs and student houses for other students.

There are no provisions that stipulate that student dormitories should be easily accessible, to have at least one or two access rooms where students with disabilities can stay, as well as an accessible toilet.

From the work of the Ombudsman, after submitting complaints regarding equality before the law, regarding the access to certain services such as banks, it is stated that most banks do not have access to the use of certain services. By filling out a form, persons who are blind and blind people can perform certain transactions or other types of financial services. However, in conversation with these people, information was received that the facsimile that they use as a hand-written signature is not always accepted by the institutions as credible - a circumstance that they regard as unequal access and an obstacle in the exercise of their rights, guaranteed by law.

⁵ Article 2 from the Law on textbooks for primary and secondary education (Official gazette of the Republic of Macedonia No. 98/2008, 99/2009, 83/2010, 36/2011, 135/2011, 46/2012, 24/2013, 120/2013, 29/2014, 146/2015, 217/2015 и 30/2016

⁶ Law for Vocational education and training (Official gazette of the Republic of Macedonia No.71/2006, 117/2008, 148/2009, 17/2011, 24/2013, 137/2013, 41/2014, 145/2015 и 55/2016) .

⁷ Law for student standards (Official gazette of the Republic of Macedonia No. 52/2005, 117/2008, 17/2011, 135/2011, 15/2013, 41/2014, 146/2015 и 30/2016)

Following the situation with the exercise of the right to vote of persons with disabilities from the aspect of equality before the laws, the Ombudsman found that persons with disabilities can not fully exercise this right, if the voting place is in a building without elevator or on a higher floor they are not able to reach that place.. There is no adequate infrastructure and ramp for wheelchairs, the compartment and the voting box are very high placed for persons with wheelchairs. Due to the inability to independently exercise the right to vote, the perception of persons with disabilities is that they are not equal before the law, and they feel discriminated by the state.

The Ombudsman concluded that the Voters 'Register and the Voters' List were not adjusted to Braille letter. There is no electronic voting method for blind persons who do not know Braille Letter, and the web site of the State Election Commission does not allow these persons to be informed by audio recording and receive specific information that would help them to exercise their voting right.

The Ombudsman welcomes the efforts of the state for adoption the Guidelines arising from Article 112-a of the Election Laws. The State Election Commission for the voters - persons with disabilities tried to find a way for equal access to the voting units , the conclusion is that there is no system for equal access for all citizens to the voting units .

The Ombudsman recommended that the State Election Commission, as an independent body that is responsible in conducting the election process, should undertake certain measures for resolving the infrastructural problems, that is, if the voting procedure take place in public buildings (schools, municipalities etc.), these objects must meet all the standards for access of persons with disabilities. The Ombudsman recommended that every voting object should provide at least one compartment that would be adjusted for persons in wheelchairs, and the level of the voting boxes should be on a proper height, so persons with other health or congenital problems(short stature , hunchbackness) could easily reach the voting boxes. In the direction of equal treatment and protection against discrimination, the Ombudsman recommended to the State Election Commission to amend the Guidelines by enabling electronic voting for the visually impaired persons , as well as to modify the SEC website by placing a special application suitable for blind and visually impaired persons.

Due to the fact that the Ombudsman's recommendations were not implemented and respected by the State Election Commission, in accordance with the legal competences, a special Information was submitted to the Government of the Republic of Macedonia in which we listed the recommended solutions for amending the specific Guidelines arising from Article 112-a of the Election Code.

Article 13 - Access to justice

In 2013, in order to exercise the right to an interpreter in the procedures before the bodies and institutions, the Ombudsman indicated to the Ministry of Labor and Social

Policy to consistently respect the right to provide an interpreter, and to undertake measures to increase the number of trained experts in the sign language, which will simplify the accessibility of these persons to different institutions of the system. During this period, the Ministry of Labor and Social Policy informed about registered licensed interpreters of the sign language at the level of the Republic of Macedonia, which deaf people can engage for their personal needs, but also in communication with the relevant institutions, based on the decision delivered by the Center for Social Work, which the deaf person is granted the right to an interpreter. In order to continuously increase the number of licensed interpreters in the sign language for 2014, additional funds were provided for organizing sign language training in the framework of the existing program activities of the National Union of Deaf and Hard of Hearing of the Republic of Macedonia and the Sign Language Commission. For 120 pharmacists was organized training for elementary level of communication, in several cities throughout the country, for which additional funds were provided in the Budget of the Ministry.

Article 19 - Independent living and community involvement

In the period 2012-2016, the Ombudsman acting as a National Preventive Mechanism made regular and subsequent visits to the Special Institute Demir Kapija. According to the Statute, the basic activity of the institution is accommodation of persons with disabilities in mental development, care, health care, rehabilitation, work and occupational therapy, in accordance with the capacity and health condition of the users. The visits were made on 20.12.2012 (first regular unannounced visit), 28.11.2013 (unannounced sequential visit) and from 23-27.06.2016 (unannounced visit).

During the regular unannounced visit, there were 240 users with moderate and severe physical and mental disabilities. In 2013, during a subsequent unannounced visit, this number was 262 users with moderate and severe physical and mental disabilities, and during the third visit, 227 users were registered. In addition, during the first regular visit conducted in 2012, as well as during the subsequent visit in 2013 it was concluded that the material conditions do not meet the required standards in maintaining the hygiene of the premises. The users are bathe by people of the opposite sex, which was not changed during the subsequent visit when it is concluded that even though there are male carers in the institution, the more severe cases of users are bathe by female carers.

The Ombudsman-NPM determined that only a small number of users were deprived of their working ability and were appropriately appointed a guardian. The NPM team suggested a detailed assessment to be made on the situation and appropriate procedures should be initiated for deprivation of the working ability and appointment of guardians for all users where needed. The sequential visit showed that this recommendation was partially implemented, having in mind that although efforts have been made to appoint guardians by the Center for social work, the Institute

does not have an employed social worker. The Ombudsman also recommended sufficient quantity and variety of food and meals for the users, including the users with diabetes which do not have special diet provided.

Attendance and visits from external associates (gynecologist, internist and physician) are not at satisfactory level, and despite the recommendation to increase the presence and visits of external associates, a subsequent visit concludes that this recommendation has not been implemented.

After the regular unannounced visit in 2016, the Ombudsman found the deficiency of working staff from all profiles, and in that context, sent a recommendation to the Ministry of Finance and the Ministry of Labor and Social Policy to act in accordance with the Requests for new employments of the Special Institute Demir Kapija and to enable employment of additional staff which is required.

According to the Ombudsman, the continuous reception of new users in the Institution is contrary to the policy and principle of deinstitutionalization noted in the "National Strategy for deinstitutionalization in the system of social protection in the Republic of Macedonia 2008-2018", The Ombudsman noted that it is necessary the process of deinstitutionalization to continue, The Ministry of Labor and Social Policy and the Special Institution to undertake specific activities for the preparation and accommodation of the users in biological families or in another extra-institutional care, and to enforce the standards for realization of the deinstitutionalization .

In response to the recommendation, the Ministry of Labor and Social Policy point out that in order to implement the deinstitutionalization process, it has prepared an Action Plan for the expanding the residential units for persons with disabilities. it is planned to open 21 new residential units in which 105 new people with mental disabilities will live. In 2017 it is planned to open 3 additional residential units for 15 users, in 2018 , 5 residential units for 25 users, in 2019 ,6 residential units for 30 users, for 2020, 1 residential unit for 5 users and in the following five years, another residential unit for 5 users.

The Ombudsman found that in the last 5 (five) years none of the users who died in the Institution had been autopsied and pointed out to a case of unusual death among the users. it is necessary the centers for social work, that is, the management of the Special Institute to request for an autopsy in order to determine the cause of death. Another concern is also the fact that there is no separation of the users in the institution, so that in one room there are male and female users, which is contrary to the Program and activities of the Special Institution Demir Kapija.

The Ombudsman concluded that the food is served in improvised dining rooms located in the halls, next to the sanitary nodes, which is a really dangerous because it can cause infections and diseases. So in that direction, it recommended to provide dining rooms at a suitable place where consumers will consume food in conditions

that satisfy the basic sanitary, facilities and health standards, while at the same time it will be avoided the danger of infections and diseases.

The extremely bad living conditions do not meet the minimum standards for functioning of this institution (unbearable and strong urine odor, low level of hygiene, poor condition of the sanitary facilities and non-functional toilets, many insects, moisture etc.), which is why it is necessary to improve the level of hygiene and the situation with the sanitary facilities and material conditions of the Institution in general, through renovation of the Institution and by employing more hygienists who will take care of hygiene maintenance.

In addition to the stated, the Ombudsman-National Preventive Mechanism during the visit of the Institute in 2016, detected lice among the users, as well as a large number of insects in all parts of the Special Institute, including in the kitchen. It was not possible to have adequate physical therapy, because the physical therapy room is out of use, and the physical therapy is carried out in the accommodation rooms. The elevator it is out of function for years and the users are not able to exercise their right to go outside and they are forced to stay in the premises on the floor. There is not enough sport, educational and creative activities. There are not enough organized excursions and visits to manifestations of cultural-entertaining character. The users are not included in any work or occupational activity in accordance with their physical and mental abilities.

Article 24 Education

The Ombudsman concluded that there are no evident changes for the children and persons with disabilities in exercising their right to education. According to the national survey carried out by the Ombudsman in 2016, about the level of involvement of children with special needs in the primary schools (325 primary schools were covered), it appears that the legal and part of the relevant subordinate legislation in the Republic of Macedonia is not in accordance with the international standards given in the Convention on the Rights of the Child, the Convention on the Rights of Persons with Disabilities, and the Statement of Salamanca.

In that sense, the disability is absent as a basis for discrimination in the Law on Primary Education and other laws and subordinate laws related to education, and more declaratively the inclusion is being promoted, with the impression that inclusion is an exception, and the separation is the rule.

According to the Ombudsman, the legal regulation in the Republic of Macedonia is more focused on the disability of children as a medical category and towards addressing the problems that arise from it, rather than the potentials of the children and their abilities.

There is no educational system that is subordinate to the diversity and needs of each child (reasonable adjustment), so children are categorized and enrolled in

educational institutions in accordance with those categorizations, making the medical categorization a key document for the further course of the child through the educational system and in conditions of having special schools (which are associated with a certain type of disability) and special classes in regular schools (which are also related to the medical categorization), cannot discuss for a unified system of education.

The Ombudsman, through his work can conclude that in the legal and the subordinate regulation there are no solutions that put the child and his best interest in the center of attention, and thus the absence of a system for support during the entire process of education. Also, there is no efficient and complete systematic (legal) change for support in the education of children with disabilities, and the institutional support of inclusion as a level of capacities is insufficient (factual existence of appropriate institutions, knowledge and skills and accessibility to the existing institutions), as well as on the level of organization (communication between institutions, sharing rights and responsibilities, target instead of functional direction).

The institutional fragmentation impedes the child with disabilities in obtaining quality education and special help, while lacking knowledge, skills and coordinated action at the institutional level in the direction of the best interest and appropriate inclusive education of the child with disabilities.

Institutionalizing the children with disabilities in separate (special) classes in regular schools is treated as inclusion from great number of teachers, even though the practice shows that these children do not have at all or have limited contacts with the other children. The schools are not appropriately staffed and technically equipped to implement the inclusion of children with disabilities in the regular primary education. Also, there is lack of adequate and continuous training of the teaching staff for working with these children in the schools, and thus the absence of improvement in the quality of education they receive. A greater sensibility of the employees in the schools is needed as well, for the situation with these children and the importance of their inclusion, and the assessment / testing of the gained knowledge and skills of the children with disabilities is not adjusted and is not an objective overview of their knowledge.

The constataions and recommendations of the Ombudsman from the conducted research were submitted to all schools and competent parties, as well as to the Ministry of Education and Science, with a request to undertake measures towards full realization and protection of the right to education of children with special needs.

In addition to the stated, the Ombudsman concluded that the inclusion in the secondary education is reduced to impromptu implementation, which is a consequence of the superficial understanding and interpretation of what the inclusion means. The lack of legal compliance and consistent application of existing laws,

insufficient preparation of school conditions and staff for work with students with disabilities, incompleteness of professional teams, low level of awareness for the needs of students with disabilities influence the creation of equal educational opportunities for all. Schools often provide incomplete measures and their implementation is reduced to "pro forma" which does not result in positive effects. The absence of clearly defined inclusion standards leads to low expectations and an unrealistic picture of inclusion as a process.

This is based on the following concrete remarks: The legislation is not fully in line with the provisions of key international documents in this field. This includes the right to enroll students with disabilities in regular secondary education. There is no mechanism for systematic identification, recording and monitoring of students with disabilities in the regular secondary education. On the one hand, it greatly reduces their educational opportunities, and on the other hand it makes it difficult to plan educational policies. Support for inclusion is mainly declarative. Not enough budgetary resources are provided to support the inclusion of students with disabilities in regular secondary education. Although the accessibility of education is generally understood in the physical sense, it is not sufficiently provided. Mainly, it refers to providing an access ramp in the school buildings, while neglecting the standards, very little is done about the accessibility of the internal premises and didactic means, i.e. school equipment for inclusive teaching. Despite the positive experiences from piloting the use of assistive technology (the result of a civil society initiative), the role of modern information and communication technology as a tool for educational inclusion is almost completely ignored. Accessible didactic tools and materials are not being used, as well as no textbooks and other educational material in the Braille letter, in audio format or in accordance with the web accessibility standards. There is no adequate legal framework on this issue. Teachers do not have adequate knowledge and skills in terms of work with students with disabilities and individualization of the teaching. Particular difficulty is the development and application of the individual educational plans and the assessment of students working according those individual education plan. There is no unified approach to this issue.

This was mentioned in the Ombudsman's research conducted in 2017 on the inclusion of children and youth with disabilities in the regular secondary education.

The conclusion, among other things, is that the inclusive school teams do not have a sufficiently clear role and competences. Their formation is currently of formal character. Additionally, the current legal solution (which sets out the obligation to form inclusive school teams) suggests that such teams should be formed in special secondary schools. There is insufficient support for the inclusion of the general and expert public. One of the effects is the lack of use of special schools and their capacity to function as resource centers to support inclusion in regular education. There are no mechanisms for sharing experiences and good practices between schools, professional teams and teachers. There are no mechanisms for exchanging information and coordination between different levels of education (for example, primary and secondary education). There is insufficient awareness of the needs, capabilities and abilities of students with special educational needs in the school, narrower and wider public. Very poor participation of students with special educational needs and their families was noted in the processes that prefer their active participation as partners: assessment of abilities, opportunities and needs, creation of an individual educational plan and adjustment of the school environment and resources. Students with special educational needs are minimally represented by their participation in extracurricular activities.

Regarding the education of children with disabilities, complaints with parents' petitions are often submitted to transfer a child with disabilities from the class where children without disabilities learn, in order not to "hinder" the education of the other children. The Ombudsman believes that more engagement from the professional services in the school for working with all children, programs and activities for respecting and respecting the diversity is needed.

Article 25 / Article 28 – Health

From the meetings carried out with parents of the children / persons with cerebral palsy and Down syndrome, as well as with parents of children with hearing impairment, the Ombudsman established that these persons have difficulties to access the right to health care and health insurance, or more precisely they have difficulties to be provided with orthopedic device.

Having found that these persons can not exercise the right to an orthopedic device due to not fulfilling the conditions established in the Rulebook on indications of the right to orthopedic devices (Official Gazette of the Republic of Macedonia No.

84/2012), the Ombudsman established violation of the rights of the who are in need of an orthopedic device. Namely, the aforementioned Rulebook is bylaw, adopted by the Health Insurance Fund which stipulates a condition of a six-month uninterrupted duration of the health insurance in order for these persons to be able to obtain an orthopedic device.

According to the Ombudsman, the relevant bodies and institutions shall put the protection of the children's health and prevention of the harmful consequences thereto as a priority. Therefore, the Ombudsman issued a recommendation to the Health Insurance Fund to review the provisions of the Rulebook on indications of the right of orthopedic devices (Official Gazette of the Republic of Macedonia No. 84/2012), and to reconsider the condition of a 6 month uninterrupted duration of health insurance required for a child to receive an orthopedic device. With special information the Ombudsman informed the Minister of Health to proceed with amendments to the Law on Health Insurance, which will enable these persons to exercise the right to an orthopedic device without meeting the condition of having 6 months uninterrupted health insurance.

In the course of 2016, the Ombudsman investigated the situation in the specialized psychiatric institutions in Skopje, Negorci and Demir Hisar in order to assess the level of exercise of the rights of persons with mental disabilities, in accordance with the Law on Mental Health. The NPM found poor material conditions, lack of staff - doctors, nurses, paramedics and caregivers, especially in the PHI Psychiatric hospital in Skopje, where since 2009 there are 100 vacant job positions. The level of hygiene in the premises is at a satisfactory level, and given the dilapidation in part of the facilities the highest level of hygiene cannot be expected.

From the performed visits and the determined conditions it was concluded that there is no strategy for mental health as a strategic document that regulates the issues of hospitalization and treatment of this category of patients. It is necessary to adopt a special program for reconstruction of the facilities and premises where the patients are staying and, as well as to establish standards for continuous education and training of the staff in order to raise public awareness on the mental health. The findings of the Ombudsman from the field research along with the issued

recommendations are compiled in comprehensive information that was submitted to the relevant authorities.

According to the Ombudsman, the adoption of a new National Strategy for Mental Health will create preconditions for continuing the process of de-institutionalization and strengthen prevention in the field of mental health. Among other things, the Ombudsman recommended urgent measures to be taken to improve the poor material conditions, especially the male section of the Psychiatric Hospital Skopje including adequate staffing of the specialized healthcare institutions, especially in the PHI Psychiatric Hospital Skopje.

During 2016, following the intervention of the Ombudsman, children with endocrine disorders continued their treatment with the same growth hormone therapy. Namely, the Pediatric Clinic in agreement with the Ministry of Health decided to procure only biologically similar hormone therapy for all children with endocrine disorders. After being informed that the change of therapy can cause serious contraindications and side effects on the children's health, the Ombudsman issued a Recommendation and asked for appropriate measures to be taken for in order to provide continuous health care for these children and in order for them to continue with the same growth hormone therapy.

Article 27 – Work and employment

The Ombudsman's survey conducted in 2012⁸ on the exercise of the right to employment of persons with disabilities in 2012 showed that although there is good legal framework in place, it lacks consistent and full implementation. Namely, in practice, these people face stereotypes and prejudices in exercising the right to employment, and neither the employers nor these persons are aware of the rights and responsibilities arising from the labor relations. These persons are unsatisfied with the services of the supervising authorities since they are being discouraged to report abuses occurring at the workplace. The dissatisfaction is also due to the delayed procedures for reaching a decision of the Commission for assessment of the working capacity.

⁸ Round table on "Employment of persons with disabilities, conditions and challenges", 2012, www.ombudsman.mk

This research also showed that the relevant authorities do not possess complete documentation, and in particular there is no single record of the number of persons with disabilities working or the number of persons whose employment has been terminated. At the same time, the communication between these persons, the employers and the authorities is carried out with difficulties, depending on the level of one person's disabilities, due to which the process of socialization of the persons with disabilities is slow and incomplete. Therefore, it is necessary to create conditions and opportunities for employment, that is, increase the number of employments of persons with disabilities in the so-called protective trade companies, but also in the public and state administration.

Following the job vacancy for a total of 300 employees (persons with disabilities) and acting upon complaints filed by these persons due to delayed start date of their employment; in 2016 the Ombudsman conducted a survey on the level of exercise of the right to employment of these persons. The research aimed to assess the level of exercise of the right to employment after the abovementioned job vacancy in October 2013 by the PE "Macedonian Forests". For this purpose, the Ombudsman prepared and submitted questionnaire to the PE "Macedonian Forests", the Ministry of Information Society and Administration and the Ministry of Labor and Social Policy. In doing so, he established that the overall procedure for employing a larger number of persons with disabilities has numerous weaknesses.

Namely, it is not well planned, conceptualized or timely realized. There was no assessment of the real need for employment of these persons prior to the job vacancy. Instead, the assessment was carried out after the job vacancy has been posted. Moreover, there is a discrepancy between the job vacancy and the real vacant job positions. There is large number of persons with disabilities who have exercised the right to employment slowly and with difficulties, and there are still persons who have not exercised their right. Although the period ranging from the ranking of eligible candidates to their start date was envisaged to last from 4-6 months, 3 years after the job vacancy there is still a significant number of persons that are not yet employed, they do not get paid and neither are insured. Additionally, the persons with disabilities were referred to the Commission for assessment of the working capacity in order to have the type and level of disability determined, as well as to assess their ability to perform certain tasks.

The Ombudsman also established a lack of coordination between the bodies / institutions in charge of implementing the Government's Employment Program for 300 persons with disabilities (PE "Macedonian Forests", the Ministry of Labor and Social Policy and the Ministry of Information Society and Administration) which proved detrimental to the candidates. Consequently, the Ombudsman issued recommendations and informed the public through the Annual Report. The whole report concerning the aforementioned situation is published on the Ombudsman's website.

In practice, no real preconditions have been created so that these persons can exercise this right on an equal basis with others, noting that due to the need for appropriate adaptation of the persons with disabilities, they are no longer eager to be employed. In this direction, it is necessary to promote the model of supported employment, and not only the model of protective employment that functions in the Republic of Macedonia, since these persons get no support in the course of their work, that is, they either can't get or can't keep the job.

According to the Ombudsman, the state should undertake precise and continuous measures aimed at employment of these persons in all the administrative bodies / institutions, and not only in the protective trade companies, that is, to create and offer opportunities for professional growth of the persons with disabilities.

The employment of these persons requires individual approach in accordance with the capacities of each person, as well as creating mechanisms for detection and sanctioning of the fictitious employments and the workplace abuse of the persons with disabilities.

Article 28 - Appropriate standard of living and social protection

The Ombudsman noted obstacles in the implementation of the rights on social protection, such as the allowance for mobility, blindness and deafness as a result of untimely adoption of decision. Upon the Ombudsman interventions, the citizens were able to exercise that right before the competent centers for social work and the Ministry of Labor and Social Policy. Such situation was concluded from the content of the submitted complaints.

The Ombudsman concluded that the parents of children / persons with disabilities are familiar with the right to financial compensation, but also that the amount of compensation is not sufficient to cover the needs of the children / persons. In this direction goes the dissatisfaction with the state of the day care centers and the other forms of care and support for children / persons with disabilities.

At the meetings with the relatives of the children with disabilities, as well as with the children themselves, so as through their visits to the Ombudsman Office, it was emphasized that in absence of child care centers and trained personnel, most parents need 24 hours care over the child which affects their jobs. Such situation increases the risk they are already exposed to.

Particular dissatisfaction and a feeling of inequality among the parents derives from the Law on Social Protection, which allows accommodation and care for these children / persons in a foster family, whereby the family receives a monthly allowance for the expenses of accommodation and care for those persons. On the other side, such allowance is not envisaged for the parents. Children / people with Down's syndrome need a companion that will help them move more easily, that is, to orient themselves in the space, but also to physically support them because of the specificity of the condition they are in. In the absence of day care centers, that is, a place where they can spend a certain part of their time through social and other activities, parents report that for years they do not know how to get out and relax, to visit theater, cinema since they must be with their children 24 hours.

According to the Ombudsman, it is necessary for the state to provide adequate forms of independent housing for children / persons with disabilities with the help of an assistant, as well as to provide assistants to the parents who need them. That will enable the parents to plan their leisure activities (visit theater, cinema, rest, etc.), without fear who will take care of their children, an opportunity provided in some other countries.

The Ombudsman visited some of the day care centers for people with special needs, where aside of the positive benefits, detected problems these day-care centers face in their work. It was found that the centers do not have sufficient material resources for normal development of the daily activities and tasks, so as adequate professional staff, technical and financial resources.

The visits to the day centers, among other, confirmed that the functioning of these centers presents a good solution, since the rehabilitation and socialization for these people is of great importance, also their active participation in the social life is encouraged. At the same time, such centers stimulate the acceptance of people with special needs, support is given to overcome the situation with the social isolation, so as easier adaptation to a new environment. There is also a positive change in the behavior of the children with special needs, among other thing, they develop certain skills and abilities, increase their personal independence, communication and working abilities, motor skills and speech, and build awareness of the right and proper attitude towards other people with disabilities.

The Ombudsman submitted to the Ministry of Education and Science and to the Ministry of Health an Initiative for amending and supplementing the Rulebook for assessment of the specific needs of persons with disabilities in the physical or psychological development, because the existing normative solutions stipulated in the Rulebook, prevent children / persons with cystic fibrosis to exercise the right to a special financial allowance because this disease is not covered, that is, contained in the Article 9 paragraph 1 of the Rulebook on Request for specific needs of people with physical or mental development.

Taking into account the stated situation and the problem faced by the patients with cystic fibrosis, the Ombudsman requested amending and supplementing of the rulebook, so that cystic fibrosis would be included in the group of most severe forms of chronic diseases in order these patients to be provided with unobstructed access to the right to a special financial allowance. At the same time consideration was given to recognize the right to allowance for adults with cystic fibrosis, that is, persons over the age of 26.

The Ombudsman's request was accepted, and the Rulebook was amended so that the cystic fibrosis disease was included in the group of most severe forms of chronic diseases, which enabled children to exercise their right to financial compensation.

Article 30 - Participation in cultural life, recreation, leisure and sport

Children / people with disabilities are insufficiently involved in the cultural life of the community, their participation depends on the possibilities of the parent /

guardian. Children with mild disabilities involved in the educational system within the curriculum participate in some types of sports and recreational activities, which is not the case for the other children with more severe disability. The community emphasizes the need for greater engagement of the local communities for organized visits of all children equally, among them children with special needs, encouraging participation in the sports and the recreational events, by providing free use of the services of some facilities. That will increase the participation of these children / persons in sports and recreation, will change the awareness of the others towards the children and people with special needs, that is, will contribute to greater acceptance of the difference. It is also necessary to adjust the programs by which these children / people will be able to engage in sports and recreational activities, as well as to take measures for exercise of the rights of these children / persons who live in the rural areas where the opportunities are largely limited.

According to the Ombudsman, the respect and exercise of the rights of children and persons with disabilities should be directed towards creating conditions for providing a meaningful life based on equality and non-discrimination, and in that sense, it is necessary to hear and take into account their considerations, as well as create conditions for participation in the community, contributing towards a society which ensures equal enjoyment of human freedoms and rights, equal treatment of differences, respect of the human dignity. The promotion, protection and provision of persons with disabilities to enjoy full and equal enjoyment of human rights and fundamental freedoms, and to promote respect for their dignity is in fact, the main objective of the Convention on the Rights of Persons with Disabilities as well as the Convention on the Rights of Persons with Disabilities the rights of the child.

Apart of the above mentioned, the Ombudsman considers it necessary to take continuous measures in all spheres of the social life in order to raise awareness about the disability and develop inclusive services, accepting in such way the fact that children / persons with disabilities need an individualized approach. The principle of participation and inclusion should enable inclusion of these persons in the society, especially in the process of decision making about them and their rights, whereas those without disabilities (special needs) should show readiness and openness for the process of inclusion.

IV. Statistics

In addition, the Ombudsman submits to the Committee a review of submitted complaints per years and areas where the applicants, as persons with disabilities requested protection of their rights, so as an overview of the Ombudsman's proceedings since the ratification of the Convention on the Rights of Persons with Disabilities.

REVIEW ON RECEIVED COMPLAINTS																				
	2008		2009		2010		2011		2012		2013		2014		2015		2016		2017	
	No.	%																		
ion-discrimination and dequats and equitable representation	21	0,69	20	0,55	16	0,4	42	0,99	32	0,74	51	1,35	66	1,55	53	1,2	69	1,83	70	2,17
olice procedures	236	7,81	252	6,94	238	5,89	179	4,21	220	5,06	177	4,68	173	4,07	156	3,54	133	3,52	152	4,72
ivil statue and other starlor affairs	132	4,37	154	4,24	169	4,18	126	2,96	156	3,59	97	2,57	85	2	90	2,04	45	1,19	53	1,64
udiciary	883	29,22	744	20,5	757	18,7	732	17,2	710	16,34	732	19,37	901	21,2	850	19,32	577	15,28	576	17,87
ocial protection	115	3,81	95	2,62	140	3,46	193	4,53	240	5,52	206	5,45	279	6,57	382	8,67	245	6,49	157	4,87
abor relations	253	8,37	389	10,7	365	9,03	412	9,68	306	7,04	246	6,51	299	7,04	265	6,02	155	4,11	199	6,17
ousing relations	34	1,13	57	1,57	89	2,2	65	1,53	57	1,31	76	2,01	36	0,85	42	0,95	48	1,27	11	0,34
health protection	69	2,28	72	1,98	93	2,3	115	2,7	166	3,82	128	3,39	125	2,94	79	1,79	83	2,2	101	3,13
ension and disability insurance	180	5,96	181	4,98	159	3,93	237	5,57	241	5,55	224	5,93	221	5,2	175	3,97	135	3,58	138	4,28
ducation, science, culture and sport	39	1,29	49	1,35	48	1,19	45	1,06	35	0,81	34	0,9	21	0,49	41	0,93	29	0,77	17	0,53
hildren's rights	145	4,8	157	4,32	111	2,75	144	3,38	161	3,7	116	3,07	124	2,92	158	3,59	106	2,81	119	3,69
urban planning and onstruction	162	5,36	170	4,68	170	4,2	146	3,43	155	3,57	140	3,7	168	3,95	168	3,81	165	4,37	158	4,90
vironment	15	0,5	21	0,58	20	0,49	26	0,61	35	0,81	20	0,53	26	0,61	16	0,36	15	0,4	22	0,68
inances	48	1,59	50	1,38	71	1,76	101	2,37	130	2,99	106	2,8	407	9,58	865	19,64	1039	27,52	510	15,82
roperty – legal relations	317	10,49	361	9,94	401	9,92	360	8,46	272	6,26	261	6,9	239	5,62	224	5,09	174	4,61	125	3,88
consumers' rights	147	4,86	277	7,63	553	13,7	673	15,61	948	21,81	646	17,09	486	11,44	368	8,36	309	8,19	281	8,72
enitentiary – correctional and educational – ersons with special needs			347	9,55	395	9,77	352	5,27	278	6,4	247	6,53	274	6,45	257	5,84	198	5,25	264	8,19
ensus							12	0,28	3	0,07										
electoral rights							90	2,11			42	1,11	78	1,84	2	0,05	65	1,72	25	0,78
ther	226	7,48	236	6,5	248	6,13	206	4,84	191	4,39	221	5,85	230	5,41	203	4,61	170	4,5	240	7,45
TOTAL:	3022	100	3632	100	4043	100	4256	100	4346	100	3780	100	4249	100	4403	100	3775	100	3223	100