

WRITTEN COMMENTS

BY THE EUROPEAN ROMA RIGHTS CENTRE CONCERNING NORTH MACEDONIA

For Consideration by the United Nations Committee Against Torture, at
its 79th Session (15 April to 10 May 2024)

CHALLENGING DISCRIMINATION PROMOTING EQUALITY

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INTRODUCTION

The European Roma Rights Centre (ERRC)¹ hereby submits these comments concerning North Macedonia (FYROM) to the 79th UN Committee Against Torture session (15 April to 10 May 2024). The submission focuses on the plight of Roma within the criminal justice system, police brutality against Roma, ill-treatment of Romani prisoners, racial profiling at the borders, police violence during the Covid pandemic, reproductive and obstetric violence. ERRC's concerns have been echoed by international organisations, and UNCAT's worries in 2015 regarding police violence have proven to be well-founded in the years that followed.

In its 2015 Concluding Observations, UNCAT expressed 'worry' regarding the excessive use of force by police officials against Roma in North Macedonia, and called on the state to combat and prevent discriminatory police misconduct, to ensure that all alleged cases are promptly and effectively recorded and investigated, and, as appropriate, prosecuted and punished.²

In its 2021 report on North Macedonia, the European Commission expressed its concern that *"the civilian external oversight mechanism over the police is not fully functional, and the absence of genuinely independent investigators impedes efforts to address police impunity and effective prosecution."*³

ECRI in its 2023 report recommended that the authorities intensify their efforts to prevent and combat antigypsyism in policing. ECRI called for determined action to encourage Roma victims and witnesses of police abuse to come forward, provide them with appropriate support and ensure better police accountability notably by developing effective internal and external police oversight mechanisms, increase police training on issues affecting Roma populations, promote Roma recruitment to police services and ensure that Roma police officers enjoy equal opportunities for career development.⁴

This submission combines research findings, advocacy and litigation conducted by the ERRC and its partners in North Macedonia since 2015.

1 The ERRC is a Roma-led international public interest law organisation working to combat anti-Romani racism and human rights abuse of Roma through strategic litigation, research and policy development, advocacy and human rights education. Since its establishment in 1996, the ERRC has endeavored to provide Roma with the tools necessary to combat discrimination and achieve equal access to justice, education, housing, health care and public services. The ERRC has consultative status with the Council of Europe, as well as with the Economic and Social Council of the United Nations. More information is available at: <https://www.errc.org/>.

2 UN Committee Against Torture: Concluding observations on the third periodic report of the former Yugoslav Republic of Macedonia. 5 June 2015.

3 European Commission, *Commission Staff Working Document, North Macedonia 2021 Report*, 19 October 2021. Available at: <https://op.europa.eu/en/publication-detail/-/publication/242f0886-30ec-11ec-bd8e-01aa75ed71a1/language-en>.

4 ECRI Report on Macedonia (6th monitoring cycle) 29 June 2023. Available at: <https://rm.coe.int/sixth-ecri-report-on-north-macedonia/1680ac8c47>.

ROMA IN THE CRIMINAL JUSTICE SYSTEM

The European Roma Rights Centre (ERRC), in partnership with Fair Trials, produced a set of four country-reports to examine the impact that anti-Roma racism has on criminal justice systems. In North Macedonia, the evidence confirmed that at every stage of criminal proceedings, from arrest until sentencing, Romani defendants are faced with discriminatory attitudes and biases which leads to skewed decisions and unjust outcomes. In all four countries, Romani interviewees expressed their lack of trust and perception of the system as plainly unjust. Factors that contribute to the lack of trust include ethnic profiling, over-policing, the use of petty offence fining as a method of control and intimidation, and racially abusive behaviour in encounters with Roma.

Romani police officers from North Macedonia who were interviewed took it as a given that there was widespread mistrust in the criminal justice system among Roma, who, by virtue of profound marginalisation, cannot navigate the workings of the system, and are either not fully aware of their rights, nor in a position to effectively assert those rights. The officers reported regularly hearing their colleagues make insulting and derogatory remarks about Roma.

Most of the Romani interviewees from North Macedonia had experienced verbal racist abuse and physical intimidation by police officers. One described how he was taken into custody in a neighbourhood round-up of Roma after reports of a crime, and told: *“If you refuse to plead guilty during the interrogation process, then a police officer will force you to do so by slapping you in the face and beating you, and you will end up in pre-trial detention.”*

In the past two years, the ERRC has won two strategic litigation cases against North Macedonia at the European Court of Human Rights on account of the state’s failure to conduct effective investigations into allegations of police brutality against Roma.

In 2009, the North Macedonian government introduced a set of repressive measures which included passport confiscation, enhanced border controls, and ethnic profiling, which almost exclusively targeted Roma. The ERRC gathered extensive evidence, including interviews with 422 Romani people who were prevented from leaving the country; and a situation-testing exercise carried out in December 2013. This was followed by litigation in over 40 cases brought by Roma who were racially profiled at the border in civil courts in Skopje, Bitola, and Kochani. Fifteen of those cases were supported by the ERRC and the North Macedonian Young Lawyers’ Association, and some cases resulted in the Ministry of Interior being ordered to pay damages.

More recent cases and judgments, as recent as 2023, show that the issue of ethnic profiling at the borders persists. Following a testing exercise organised by the ERRC and its partners on the North Macedonian border, the court in Skopje ruled in favour of the Romani litigants who were denied the right to exit the country, ruling that they were discriminated against by border police on account of their ethnicity. More details can be found in the court cases section.

Given the proportion of Romani people relative to the general population, it was clear that Roma are disproportionately victims of police brutality. Other high-profile cases brought against the state of North Macedonia include three concerning suspicious prison deaths, and three cases about forced evictions.

Interviews with the Romani respondents and Romani police officers corroborated the evidence of anti-Roma bias and ethnic profiling. All of the Romani interviewees agreed that society generally harbours prejudicial attitudes towards Roma, citing reasons based on their personal experiences of discrimination and, more broadly, the general public’s perception that Roma are criminals and that the Romani community has inferior social status relative to the non-Roma community.

Outside the criminal justice system, many gave examples of the discrimination that they suffered because of their Romani ethnicity, with one Romani interviewee reporting that he had been refused permission to visit his brother in Europe at the North Macedonian border on the basis that he did not have a “letter of guarantee”, when non-Roma were not asked for such documentation. Others reported explicit discrimination whilst serving their prison sentences, with non-Romani prisoners being allowed certain privileges, such as use of a mobile phone, whilst Romani prisoners were not, and recounted incidents of Romani prisoners being physically beaten or forced to sell drugs by the prison guards.

Complaints lodged against ill-treatment by the police continue to raise concerns and give rise to the need to establish an independent oversight mechanism for the Ministry of Interior.

Reports of extreme and arbitrary violent attacks on members of the Romani community by police officers not only imply that racism is deeply ingrained within the police force, but also that certain officers are willing to act on such prejudices, and do so with a well-founded sense of impunity.

Concerns have also been raised in relation to inhuman conditions in police stations, social care and psychiatric facilities, and prisons (especially in Idrizovo and Skopje) and in relation to prison mortality rates, in particular because the majority of those who die in prison are of Romani origin.

Several studies have revealed the disparity in the police treatment of Roma compared to non-Roma, raising issues ranging from reports of officers attempting to coerce suspects into admitting guilt during interrogation, to flagrant abuses of police power through use of excessive force, to attempting to persuade Romani suspects to sign blank statements.

Interviews with legal professionals working with Roma corroborated this, suggesting that Roma face unequal and discriminatory treatment within the criminal justice system and particularly during police and investigation proceedings.

Half of the judgments handed down by the European Court of Human Rights against North Macedonia in relation to violation of Article 3 of the European Convention on Human Rights established inadequate investigation into Roma complaints of police abuse of power.

This research offers further evidence that Roma are more likely to be ethnically profiled and drawn into the criminal justice system than non-Roma. Once drawn in, Roma are less likely to receive adequate legal representation, and more likely to be held in pre-trial detention and to receive custodial sentences than their non-Roma counterparts.⁵

⁵ ERRC and Fair Trials, Roma in the criminal justice system of Macedonia, February 2023. Available at: <https://www.errc.org/reports--submissions/justice-denied-roma-in-the-criminal-justice-system-of-north-macedonia>.

POLICE VIOLENCE: CONCRETE CASES

Researchers for the ERRC/Fair Trials report found that many Roma interviewees who participated in the *Roma in the criminal justice system of Macedonia* research recalled instances of excessive and arbitrary force on Romani communities. One interviewee reported that when crimes were reported, the police would often assume that Roma were responsible and would attempt to coerce them into admitting guilt.

“When there is a theft in my neighbourhood, the police will come to the Roma community and order Romani residents to go to the police station to be interrogated, assuming that a Romani person has committed the crime. In the worst-case scenario, if you refuse to plead guilty during the interrogation process, then a police officer will force you to do so by slapping you in the face and beating you and you will end in a pre-trial detention.” (Romani interviewee)⁶

Below are some concrete illustrative examples from the ERRC files.

POLICING THE PANDEMIC

As in other countries, the period in which emergency measures were enforced in North Macedonia saw a number of incidents of police violence against Roma. During the Covid-19 lockdown, a significant number of actions taken by law enforcement in ‘policing the pandemic’ were observed which clearly violated the principles of non-discrimination and equality, and constituted cruel and inhumane behaviour. The following are drawn from the ERRC report *Roma Rights in the Time of Covid*.⁷

Shuto Orizari 15th May 2020: A 21-year-old Romani man was hit by a police car belonging to the special ‘Alfa’ police unit in front of his house in Shuto Orizari, sometime after 16:00 on the 15th May. A short time later, the police officers returned to his house and informed him that it was an accident and apologized. Later when his family took him to a hospital for examination, police officers were waiting for them there and took the man into custody. They brought him to Kisela Voda police station where he was reportedly beaten severely.

After he was released, he returned to the hospital to be examined where he was issued a medical certificate confirming the injuries he sustained at the police station. The incident was reported to the police, and it was announced on the 17th May 2020 that the case will be reported to the Internal Control of the Ministry of Interior.

Skopje Railway Station 7th June 2020: During curfew hours on the 7th June, a police patrol arrived at an area beneath the railway station in Skopje where ten Romani families were living together in informal housing. The group is comprised of around 60 people, of which 30 are children.

The officers were responding to complaints from some residents of nearby buildings that they were playing music loudly. The Roma told local media that a homeless man named Harun, who did not live in the neighbourhood, came there in a drunk state and asked them to play music. According to them Harun is already well known to the police for often causing problems and incidents in the area.

“When the police arrived, they asked us to turn off the music, which we did immediately” said Suzana Demir, a Romani woman who was present at the incident. “But Harun started arguing with the police and they called for reinforcements. In a few minutes, about 20 police officers from the section known as ‘Alfa’ arrived, with five or six vehicles, and without asking what was happening, they immediately started hitting us. They beat all of us including men, women, children and elderly.”

Suzana was beaten alongside the other Roma living underneath railway station. According to witnesses interviewed by the ERRC, the police officers used racial slurs and curses during their intervention, saying ‘fuck your mother’ (пичка ви матер) and ‘fuck you gypsy’ (да ве јебам цигани). One person who did not wish to be identified said *“I am afraid they will come again to beat us. There is no one to protect us. There is no one to complain to.”*

Another man described the moment the police reinforcements arrived: *“One of the police officers broke the door and forcibly entered the house and started to beat me and my wife who was holding a two-year-old child in her arms, I had no idea why they were beating us. The child was terrified and was screaming, but the police didn’t care”.*

⁶ *Ibid.*

⁷ Bernard Rorke and Jonathan Lee, *Roma Rights in the time of Covid*, ERRC, September 2020. Available at: https://www.errc.org/uploads/upload_en/file/5265_file1_roma-rights-in-the-time-of-covid..pdf

Following the attack, five people were arrested for charges relating to the Covid-19 restrictions.

One of the men who was beaten and arrested explained: *“After beating us, at about 8:00 p.m. they took the five of us to the police station in Aerodrom. Before we entered the police building they beat us more, and when we were about to enter the building, they realized that I was innocent and let me return home while the other four were taken in the police station and interrogated until midnight.”*

The four Roma who were interrogated now face criminal charges of “failure to act according to health regulations during an epidemic”, a misdemeanour of “humiliation of a police officer”, and a misdemeanour relating to non-compliance with the curfew and the Government’s recommendations for dealing with the Covid-19 pandemic (in accordance with Article 13 of the Law on Misdemeanours against Public Order and Peace). When approached by CIVIL Media, the Ministry of Interior issued the following response:

“On 07.06.2020 at around 18.30 behind the PIOM building on the quay by the river Vardar, police officers from the Police Station ‘Aerodrom’ undertook measures and activities, following a report by a citizen about violations of the curfew by a group of citizens who were gathered in a public place and disturbed public order and peace by playing loud music. In that occasion, five people had a rude behavior toward police officers after which they physically assaulted the police officers, and one of them threw a stone at the police van.”

The Ombudsman opened a case into the incident and provided legal support for the Roma victims.

‘Bair’ Community, Bitola 20th June 2020: A 25-year-old man named Doan was publicly beaten and humiliated by police officers in the informal community called ‘Bair’ in Bitola, before being taken back to the police station and further tortured in police custody. He was accused of stealing some metal.

He had reportedly been sent letters to appear before court. However, these had never arrived to his address because Bair is an informal neighbourhood without properly numbered houses, so Roma frequently do not receive mail which is sent there.

On Saturday 20 June, at around 7pm, Doan was out socialising with friends in the neighbourhood when police officers arrived to arrest him. The officers handcuffed him without explanation before beginning to beat him, according to eyewitnesses. They then stripped him to his underwear and were recorded on video dragging him down the street in front of his friends, his neighbours, and his 10-year-old daughter who later went and notified Doan’s mother about what had happened.

The next morning, at around 9am, his mother went to the police station in Bitola to see her son. A police officer there told her that, based on a judge’s decision, Doan would remain in prison for eight days in Bitola, before being transferred to Ohrid. When she was finally allowed to visit him, he was in a very poor state, exhausted, and still handcuffed and chained to a metal chair. He asked his mother for help and to find him a lawyer as he had not been offered one by the police officers, nor given any medical attention. He told his mother that the police officers there were beating him and forcing him to admit to criminal offences which he had not committed.

Doan was sentenced to three months imprisonment to be served in the prison in Prilep. For the time being, his sentence is suspended until after October because of the coronavirus pandemic. The ERRC is legally representing Doan in the criminal proceedings and initiated a complaint against the Ministry of Interior over police misconduct.

POLICE VIOLENCE AND ETHNIC PROFILING: DOMESTIC AND EUROPEAN COURT CASES

30 October 2023: *Judgment Condemns Racial Profiling At The Border In North Macedonia*

The European Court of Human Rights (ECtHR) has ruled against North Macedonia in a landmark judgment which condemns racial profiling of Roma at the border. The judgment, [Memedova & Others v North Macedonia](#), encompasses three separate applications and was successful despite a number of similar previous applications being settled through friendly settlements with the Government in recent years. The judgment pertains to five Romani applicants who were represented by the European Roma Rights Centre (ERRC) and lawyers affiliated with the Macedonian Young Lawyers Association (MYLA).

On 24th October 2023, the Court found that four of the Romani individuals had been subjected to discrimination and that their freedom of movement had been violated. North Macedonia is required to compensate them within three months of the decision with varying amounts of non-pecuniary damages totalling €13,000 collectively.

The cases brought before domestic courts were brought with the joint support of the European Roma Rights Centre and the Macedonian Young Lawyers Association.⁸

25 June 2021: *North Macedonia Failed To Investigate Racist Motivation In Police Brutality Case*

The ECtHR has ruled in favour of a Romani man who was physically assaulted by police officers in a racist attack during a violent raid in Topana, a Romani neighbourhood of Skopje, North Macedonia.

The incident occurred on 5 May 2013, when special police units conducted a raid using, what ERRC described at the time, as “excessive and arbitrary force.” Roma from the Topana neighbourhood told the ERRC that around 50 officers were involved, they forcibly entered several Romani houses and local shops without providing any explanation; harassing and pushing people, often in the presence of children. Roma reported that police officers kicked and punched them with fists and police batons. Around ten Romani individuals were beaten up, including three women. The complainant was in a shop at the time where he was kicked and punched by a large group of police officers, who also shouted racial insults at him.

The Court’s judgment found that the state authorities were in violation of Article 14 read in conjunction with Article 3 of the Convention on account of their failure to investigate the applicant’s allegations of racially motivated police brutality. The Court ordered the State to pay the applicant EUR 3,000 within three months.⁹

9 November 2020: *European Court Orders North Macedonia to Pay Compensation To Roma Brutalised By Police As Teenagers*

The European Court of Human Rights has ruled in favour of two Romani applicants, represented by the European Roma Rights Centre (ERRC), who were brutalised as teenagers by police in Skopje in 2014. The court ruled on account of the lack of an effective investigation by the police regarding the police brutality against the two Roma. However, the court refused to rule on the inhuman and degrading treatment faced by the applicants (article 3 of the Convention) or that the actions of the public prosecutor or police officers were discriminatory (article 14 of the Convention). The government of North Macedonia have been ordered by the Court to pay the Roma, who are now twenty-three and nineteen-years-old, the sum of €7,500 each.

The case concerns the failure to investigate an incident of alleged police brutality which occurred on 19th May 2014, when the Romani applicants were sixteen and thirteen years old. Police officers belonging to Skopje’s “Alfa” unit were searching for two assailants who had reportedly mugged a twenty-year-old woman nearby, and were described as males with dark skin, aged between sixteen and eighteen. A police-patrol later confronted the two teenagers, immediately assaulting them on the street, before bringing the sixteen-year-old into police custody at PS Centar station. Here the boy was allegedly further beaten by officers for several hours, until his father was summoned to the station and the boy was told: “find the bag or I’ll kill you in front of your father.” Under duress, he signed a confession stating that he had stolen a handbag from the twenty-year-old woman earlier in the evening. The thirteen-year-old boy also reported that police officers slapped his face and shouted “you Gypsies, you lie and steal!” at him on the street.

10 October 2017: *Roma Denied Exit From Macedonia Win Discrimination Case*

Two Romani families who were told they could not use their ID cards to travel outside the country, were victims of race discrimination, a court in Skopje has ruled. The four Romani litigants successfully sued the Macedonian Ministry of Interior for discrimination and violation of their right to equal treatment, with legal representation from the European Roma Rights Centre (ERRC).

Sevdije and Senad Asan and their three children, and Ajten and Suvat Bekir, who also have three children, had their passports confiscated after they returned to Macedonia, having tried to claim asylum unsuccessfully in the EU. On arrival, their passports were confiscated, and several weeks later the Ministry of Interior imposed a restriction which denied them use of their identity cards to travel across state borders.

⁸ For more information see: <https://www.errc.org/press-releases/roma-win-landmark-european-judgment-condemning-racial-profiling-at-the-border-in-north-macedonia>.

⁹ For more information see: <https://www.errc.org/press-releases/european-court-rules-north-macedonia-failed-to-investigate-racist-motivation-in-police-brutality-case>.

The passport confiscation was, at that time, in accordance with national law (which was not long after declared unconstitutional). However, the subsequent travel ban on their ID cards was, and is, illegal as the Ministry of Interior acted without any court approval to impose a travel ban. These measures, the Romani couples argued, were taken against them as part of a wider discriminatory pattern that exists within the Ministry of Interior aimed at preventing Roma from leaving Macedonia. Roma are routinely being ethnically profiled, denied exit at the border, and prosecuted for the criminal offence “abuse of visa free system” in a deliberate attempt to deny them exit from the country.

The Basic Court Skopje II delivered their first instance decision on 11 September, establishing a violation of the right to equal treatment, and awarding total damages of 200,000 MKD (€3,250) to the Romani couples. The court found that the Ministry of Interior has no role in applying EU entry regulations when performing border controls on people leaving the country, and also that the Romani couples did not represent a threat to the public policy or international relations of the Republic of Macedonia in any way. The court concluded that the Ministry discriminated against the litigants on the basis of their Romani ethnicity.¹⁰

¹⁰ See <https://www.errc.org/press-releases/roma-denied-exit-from-macedonia-win-discrimination-case>.

CASES OF CRUEL, INHUMAN OR DEGRADING TREATMENT OF WOMEN AND CHILDREN

6 April 2020: *Critically ill Romani mother and new-born die after six-hour wait for COVID-19 test results*

A 37-year-old Romani woman and her baby died in Skopje after being emergency transported to the hospital from Ohrid. The mother suffered complications which resulted in the death of her baby in utero, whilst she was denied treatment and left waiting for hours outside the hospital. She died later of sepsis after doctors in the emergency care unit were unable to revive her.

The incident occurred on 31st March after she had been waiting for three days since her waters had broken for doctors to accept her at the gynaecological clinic at Ohrid and deliver her child. The woman came from a very poor background and lived in substandard housing conditions. She visited the clinic several times complaining of extreme pain and showing signs of infection, but was denied treatment and sent home. She was finally rushed to the emergency department in Skopje only to be left outside the hospital for more than six hours while they tested her for the Covid-19 virus. The Ministry of Health subsequently confirmed that her results came back negative.¹¹

23 March 2020: *North Macedonia Ordered to Pay Compensation for Evicting Pregnant Roma*

The UN Committee on the Elimination of Discrimination against Women (CEDAW) has found in favour of six young Romani women (brought in two cases) who were evicted from their homes without warning, whilst pregnant, in August 2016. Municipal authorities came and bulldozed the homes of approximately 130 Roma, including these six women, living on the riverside beneath the Kale Fortress in the centre of Skopje. They destroyed the water pump used by the community, and also many of their possessions which were in their dwellings, leaving them homeless and vulnerable in extreme weather conditions. The Committee has given North Macedonia six months to provide reparations to the six women, as well as suitable accommodation, access to clean water, nutrition, and immediate access to affordable health-care services.

The decision comes after CEDAW responded to urgent requests from the ERRC in **November 2016** and **January 2017**, telling North Macedonia to provide immediate emergency accommodation for the six Romani women. The authorities responded by providing inadequate and substandard accommodation for the women, as temperatures in Skopje had by that time dropped to -20°C. These most recent decisions from CEDAW place an obligation on the state to provide suitable, secure accommodation and reparations.

The Committee also gave nine other recommendations to North Macedonia in relation to Roma women and girls. These called on the government to take measures to combat: intersectional forms of discrimination, poverty, lack of access to adequate housing, practices of illegal payments for reproductive health services, low quality health care, refusal for treatment by gynaecologists, obstacles in accessing adequate legal remedies and legal aid, and a specific recommendation to refrain from evicting pregnant Romani women.¹²

February 2018: *Sexual abuse of minors in Skopje care home: Romani victims accused of lying and inventing stories*

In February 2018, a scandal erupted in North Macedonia, forcing the immediate resignation of the head of '25 May' a centre for troubled youngsters in Skopje, "for moral reasons" over a scandal involving neglect and sexual abuse of Romani minors. This was prompted by the ERRC's action following disturbing reports and testimony from victims to an ERRC human rights monitor.

In one case, a 13-year-old girl, known only as R.I., had to undergo an abortion, following an ordeal in which she had been kidnapped from the centre and held for 30 days before she was able to escape. The care authorities did not report her disappearance to the police or parents. In her testimony to an ERRC human rights monitor, the girl also described how she had previously been sexually abused at a 'children's summer camp' by an unknown older man. When she reported these abuses to care-workers she was accused of lying and inventing the stories.

The ERRC obtained similar testimonies from two Romani sisters from the same institution, V.A aged 16, and L.A. aged 13. They would also frequently go missing from the care home, and their disappearances similarly went unreported to police and parents. According to their testimony, an older man identifying himself as an employee of the Centre for Social Work took them from the home to Skopje's old train station, where he

11 See <https://www.errc.org/news/9-month-pregnant-romani-woman-dies-after-waiting-six-hours-for-covid-19-test-results-to-get-emergency-care>.

12 See <https://www.errc.org/press-releases/north-macedonia-ordered-to-pay-compensation-for-evicting-pregnant-roma>.

sexually abused them. Their mother reported the case to the police and took them to a gynaecologist, who concluded that the girls had indeed suffered sexual violence.

The interventions by the ERRC prompted a series of actions which included disciplinary measures against 33 staff members, the resignation of the care home director, and two suspects being taken into police custody on charges related to human trafficking and abuse of minors. The scandal provoked strong condemnation from the Prime Minister and a promise that justice will be done.

The then relatively new ministry in the government, which assumed office in May 2017, said it was well aware of the poor state of Macedonia's social protection system, and stated: *"The case with R.I. shows the anomalies of a devastated social protection system, especially when it comes to children who face specific risks."* The ministry pledged that by mid-March 2018 it would start disbanding similar state facilities, which had remained practically unchanged since the fall of the old socialist system, and replace them with a network of smaller shelters, so that each vulnerable youngster receives more individualised attention.¹³

¹³ Bernard Rorke, *Promising Change: Romani Children in State Care in North Macedonia*, ERRC October 2023. Available at: <https://www.errc.org/reports--submissions/promising-change-romani-children-in-state-care-in-north-macedonia>.