

**PREVENTION AND PROTECTION AGAINST DISCRIMINATION THROUGH EXPERIENCES AND
KNOWLEDGE OF VULNERABLE POPULATION GROUPS**



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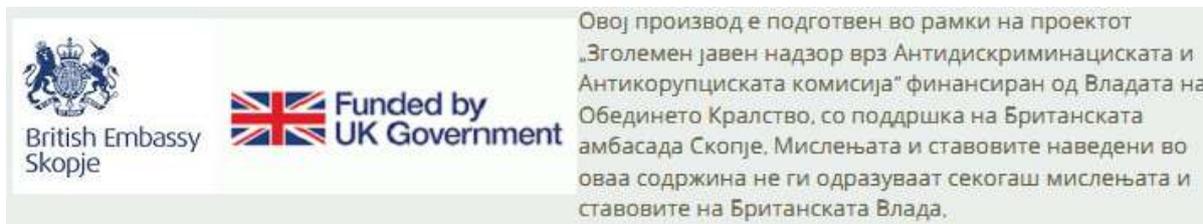
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1. INTRODUCTION

Adoption of the Law on Prevention and Protection against Discrimination in 2019¹ (hereinafter: LPPD or the law) has created normative preconditions for significant advancement of the system and institutional mechanisms that guarantee equality and provide prevention and protection against discrimination. Implementation of the law, to great extent, is conditioned with formation and operation of the Commission for Prevention and Protection against Discrimination (hereinafter: CPPD or the Commission) as separate body tasked with promotion of equality and non-discrimination in the society and protection of persons that have been discriminated.

In order to ensure effective implementation of the law, the Association for Emancipation, Solidarity and Equality of Women – ESE, in cooperation with the Institute for Human Rights, and with financial support from the British Embassy in Skopje, took a series of activities aimed to improve key aspects of the Commission's work, i.e. its transparency, accountability and effectiveness. In particular, the project team drafted an assessment of the Commission's law-stipulated mandate, which resulted in identification of preconditions for transparency, accountability and effectiveness that should be in place in order to ensure unhindered operation of this body. First and foremost, special attention should be paid to formation of new composition for the Commission for Prevention and Protection against Discrimination² and to employment of professional and expert service that will support the Commission's work. In parallel, the project team developed relevant methodology instruments for continuous monitoring of the Commission's work, which should serve as basis for progressive planning and performance of the Commission's law-mandated competences.

Having in mind that discrimination, i.e. unequal treatment, restricted exercise of rights and prevented access to goods and services, greatly affects vulnerable population groups, inclusion of their perspectives in this process is of crucial importance for completion of the project team's efforts to improve state-of-affairs in regard to equality and non-discrimination in the society. Hence, this analysis is intended to provide detailed data on the Commission's work through the prism of knowledge, views and experiences of communities that are affected by discrimination, such as: Roma, sex workers, people using drugs, LGBTI people and persons with disabilities. Therefore, this analysis provides a general image about the manner in which discrimination is understood, but also personal experiences and knowledge among above-indicated vulnerable population groups about

¹ "Official Gazette of RNM" no. 08-2888/1 from 16 May 2019

² Although the law-stipulated deadline for formation of the new commission expired on 22 August 2019, the Commission is still not formed.

available mechanisms for protection against discrimination, and detailed information about the Commission's transparency, accountability and effectiveness.

Analysis results will be used for advocacy to actualize specific needs for protection of vulnerable population groups against discrimination, and take continuous and systemic actions to familiarize them with protection mechanisms and the procedure led before the Commission for Prevention and Protection against Discrimination.

2. METHODOLOGY

The primary goal of this analysis is to integrate the perspectives of vulnerable population groups³ in the process on improving state-of-affairs in regard to equality and non-discrimination in the society. In that, the focus is put on knowledge, views and experiences of people that are particularly affected by discrimination, such as: Roma, sex workers, people using drugs, LGBTI people and persons with disabilities. This analysis includes detailed information on the needs of these vulnerable population groups, which should be taken into account in implementation of the new law and performance of expanded competences entrusted to the Commission for Prevention and Protection against Discrimination.⁴

The contents and findings of this analysis are based on data and information collected with several methodologies, as follows:

1. analysis of the legal framework on protection against discrimination;
2. use of secondary data sources; and
3. interviews with members of vulnerable population groups.

Analysis of the legal framework on protection against discrimination served as basis for establishment of basic competences assigned to the Commission, focused on transparency, accountability and effectiveness as key aspects of work performed by this body. In that regard, this analysis relied on the previously developed assessment of the Commission's law-stipulated mandate and the preconditions for its transparency, accountability and effectiveness.⁵

In parallel, the project team used secondary data sources, i.e. reports, research papers and analyses of different institutions and civil society organizations that are focused on the Commission's work and implementation of the Law on Prevention and Protection against Discrimination.

³ This analysis interchangeably uses the terms "marginalized communities" and "vulnerable groups".

⁴ Initially, the analysis was intended to address work of the new Commission according to the law from 2019, but due to the fact that the Commission was not formed within the law-stipulated deadline (August 2019), the methodology was adjusted and the analysis covers knowledge, views and experiences of marginalized communities with the previous two compositions of the Commission.

⁵ Assessment of the Commission's Law-stipulated Mandate and the Preconditions for Transparency, Accountability and Effectiveness, Association ESE, 2019, available at:

<http://www.esem.org.mk/pdf/Publikacii/2019/%D0%90%D0%9D%D0%90%D0%9B%D0%98%D0%97%D0%90%20%D0%BD%D0%B0%20%D0%B7%D0%B0%D0%BA%D0%BE%D0%BD%D1%81%D0%BA%D0%B8%D0%BE%D1%82%20%D0%BC%D0%B0%D0%BD%D0%B4%D0%B0%D1%82%20%D0%BD%D0%B0%20%D0%9A%D0%BE%D0%BC%D0%B8%D1%81.%20%D0%B7%D0%B0%20%D1%81%D0%BF%D1%80%D0%B5%D1%87.%20%D0%B8%20%D0%B7%D0%B0%D1%88%D1%82.%20%D0%BE%D0%B4%20%D0%B4%D0%B8%D1%81%D0%BA%D1%80%D0%B8%D0%BC..pdf>

Essential part of this analysis were interviews conducted with 150 individuals, i.e. 30 individuals from each vulnerable population group, which served as basis to establish their knowledge and experiences with discrimination, but also their expectations from the Commission, as the primary mechanism for protection against discrimination. The interview questionnaire was based on the previously developed assessment of the Commission's law-stipulated mandate and the developed methodology (with indicators) on monitoring the Commission's transparency, accountability and effectiveness. The questionnaire is comprised of 45 questions, grouped into several areas: basic data on interviewees; understanding of discrimination and personal experiences with discrimination; knowledge of legal possibilities for protection and the Commission's law-mandated competences; personal experiences with the protection procedure led before the Commission; transparency and accountability of the Commission; proposals to improve state-of-affairs in regard to discrimination and the Commission's work. Interviews were conducted by coordinators from civil society organizations that provide assistance and support to above-indicated vulnerable population groups, i.e. the Coalition Margins, Polio Plus, HOPS and Station LET. It should be noted that during interviews and drafting of this analysis, the coordinators from civil society organizations provided their opinions and views in terms of interpretation of data collected.

The analysis allowed the project team to infer conclusions and to draft recommendations that will be used as basis for advocacy to actualize specific needs of vulnerable population groups for protection against discrimination, and take continuous and systemic activities for legal empowerment of persons with disabilities, Roma, people using drugs, sex workers and LGBTI people, with a view to prevent discriminatory actions and ensure better protection in discrimination cases.

3. CONCLUSIONS AND RECOMMENDATIONS

a) Conclusions

Despite the improved legal framework on prevention and protection against discrimination, non-implementation of adopted legal provisions result in lack of protection for discriminated persons in the practice. The Commission for Prevention and Protection against Discrimination is not formed within the law-stipulated deadline and the necessary preconditions are not secured for effective implementation of the law.

Persons with disabilities, Roma, people using drugs, sex workers, and LGBTI people have basic knowledge about the elements of discrimination. Highest share of interviewees from vulnerable groups understand discrimination as unequal treatment (81.3%); restricted exercise of citizens' rights (44.6%); or prevented access to goods and services (34%). Majority of them (63.3%) believe they are not treated equally or they partially enjoy equal treatment (22%) in the state. Consequently, high 78% of them believe they were victims of discrimination. Most frequently indicated discrimination ground concerns belonging to marginalized group. Marginalized communities are victims of systemic discrimination, which is confirmed by the fact that state institutions are most frequently indicated as entities that have perpetrated discrimination. Persons with disabilities, Roma, people using drugs, sex workers and LGBTI people most often face discrimination in the area of social protection and healthcare, labour relations, judiciary and administration, and access to goods and services.

In case of discrimination, vast portion of interviewees from vulnerable population groups first address civil society organizations, and significantly smaller number of them address mechanisms competent for protection against discrimination. Two-thirds of interviewees responded that in case of discrimination they could address civil society organizations for assistance, while CPPD was indicated by 35%; the Ombudsman by 36.6%; and the court was indicated by 26.6%. This, inter alia, is a result of poor information among persons with disabilities, Roma, people using drugs, sex workers and LGBTI people about existence of separate law on prevention and protection against discrimination and insufficient knowledge about the Commission's competences. Interviewees that are informed about mechanisms for protection against discrimination most often obtained such information from civil society organizations or the media, and no interviewees have obtained such information from state bodies.

Lack of knowledge about the law, CPPD's competences and its protection function, is indicative of the fact that the Commission's new composition will have to intensively work on strengthening

public awareness and on promotion of its competences. Namely, 56.6% of vulnerable population groups have knowledge about existence of separate law, 50% of them lack knowledge about CPPD's role and competences, while 29.30% have partial knowledge about its role and competences. The new law provides broad bases for CPPD to take actions for promotion, prevention and protection of equality and human rights, and for suppression of all forms of discrimination, through public awareness campaigns, information dissemination and education.

There is great discrepancy between the exceptionally low number of complaints (n=9) and the high share of interviewees (78% or n=117) who responded they were victims of discrimination. Also, interviewees who were victims of discrimination indicated they have been discriminated on multiple grounds. These observations are confirmed by findings of civil society organizations, which show that reasons, inter alia, include low legal literacy and insufficient knowledge about protection mechanisms, systemic discrimination and distrust in the institutions among vulnerable population groups.

Vulnerable population groups believe that the Commission is insufficiently presented in the media and public. High share of interviewees (71.60%) from vulnerable groups who are often victims of discrimination also indicated great dissatisfaction with the manner in which the Commission is represented in the media. Also, high share (74.80%) of them is dissatisfied with the manner in which CPPD informs citizens and the public.

b) Recommendations

- It is extremely important for the Commission to build open and constructive relations with the public and media outlets, thus increasing its visibility and facilitating greater understanding of its role in prevention and protection against discrimination and gradually strengthening trust of citizens and the public. In that, CPPD should take specific measures and activities aimed at improving its transparency and accountability by means of promotion of its work at national and local level.
- CPPD's operational and financial reports should be regularly published on its website, while information posted on social networks and media should be regularly updated.
- CPPD is recommended to improve and enrich contents hosted on its website, which would allow broader affirmation of its role and competences and will significantly improve its transparency, openness and interaction with the public and direct beneficiaries.
- CPPD should establish and develop cooperation with other mechanisms for protection against discrimination, i.e. the Ombudsman, courts, equal opportunities coordinators and equal opportunities commissions at local self-government units.
- All competent bodies and institutions need to take systemic and long-term actions to address the problem of low number of complaints for protection against discrimination, by building comprehensive, effective and applicable anti-discrimination policies, efficient institutional cooperation, complete engagement and commitment on the part of CPPD in implementation of promotional and informative activities, field work, affirmation and familiarization of vulnerable population groups with its competences and other law-stipulated possibilities for protection against discrimination, and by regular monitoring of implementation of CPPD's decisions and inclusion of these vulnerable groups in mainstream society.
- CPPD should take more activities on information dissemination, promotion and education about equality and human rights and about protection against different forms of discrimination, especially among vulnerable population groups.

- In cooperation with civil society organizations, CPPD should organize and implement public awareness campaign against stigmatization and discrimination of Roma people, sex workers, people using drugs, LGBTI people and persons with disabilities, focused on discrimination grounds and discrimination areas in which members of enlisted vulnerable groups most often face discrimination.

- The Commission needs to improve its work by means of:
 - shorter deadline for decision-making upon complaints;
 - appointment of members with long-standing experience and track record in the field of non-discrimination;
 - employment of professional and competent expert service; and
 - reducing political influences on CPPD's work.

- Continuous training needs to be organized for employees at state institutions about relevant proceedings and for creation of activities on promotion and prevention of discrimination against vulnerable population groups:
 - The Ministry of Labour and Social Policy and the Ministry of Health should organize training courses for health professionals and expert services at Social Work Centres that will work with people using drugs, in order to reduce stigmatization and discrimination of this community in the area of social protection and healthcare;
 - The Academy of Judges and Prosecutors should organize and deliver training courses for academy candidates, judges and prosecutors on proceedings in cases when victims or defendants are sex workers, in order to reduce stigmatization and discrimination against sex workers in the area of judiciary and administration.

- Civil society organizations that provide services to vulnerable population groups should strengthen their activities on dissemination of information to communities about the legal and institutional framework on prevention and protection against discrimination.

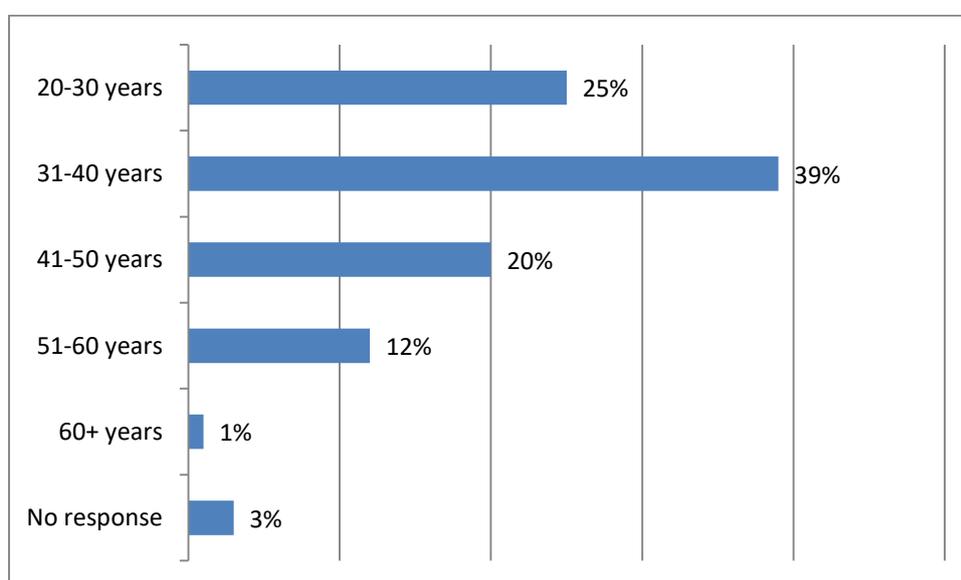
- Civil society organizations should establish cooperation with mechanisms for protection against discrimination through joint activities that will include persons with disabilities, Roma, people using drugs, sex workers and LGBTI people.

- Donors should provide financial support to civil society organizations that work with marginalized communities, in order to legally empower these communities, inform them about available mechanisms for protection against discrimination and assist them in exercising their rights before the institutions.
- Efforts are needed to advance the legal framework on protection against discrimination of persons with disabilities, Roma, people using drugs, sex workers and LGBTI people and to align other laws with LPPD.
- Efforts are needed to advance the legal framework by adopting law that will ensure legal recognition of gender for transgender people and same-sex partnerships.

4. BASIC DATA ON VULNERABLE POPULATION GROUPS

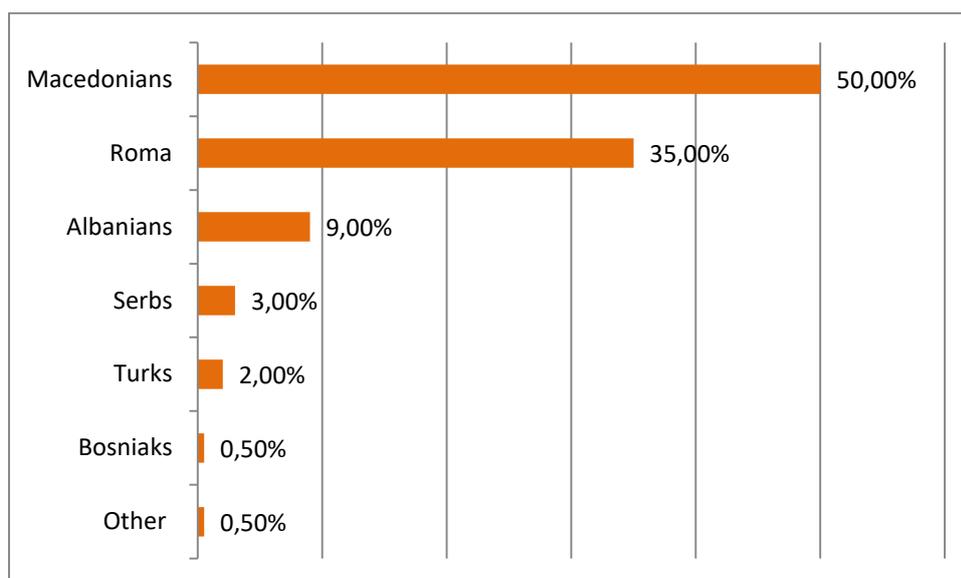
The research included organization of structured and in-depth interviews with total of 150 members of different marginalized communities, as follows: 30 persons with disabilities, 30 Roma, 30 people using drugs, 30 sex workers and 30 LGBTI people, 86 of which are female and 64 are male. As regards their gender, 86 interviewees identified themselves as women, 53 as men, 10 as transgender and 1 person identified itself as gender non-binary. Majority of interviewees (39%) belong to the age group 31-40 years, 25% of them are aged 20-30 years, 20% are aged 41-50 years, 12% of them are aged 51-60 years, and only 2 interviewees are aged 60+ years. Four interviewees did not indicate their age group.

Chart no. 1: Structure of interviewees according to their age group



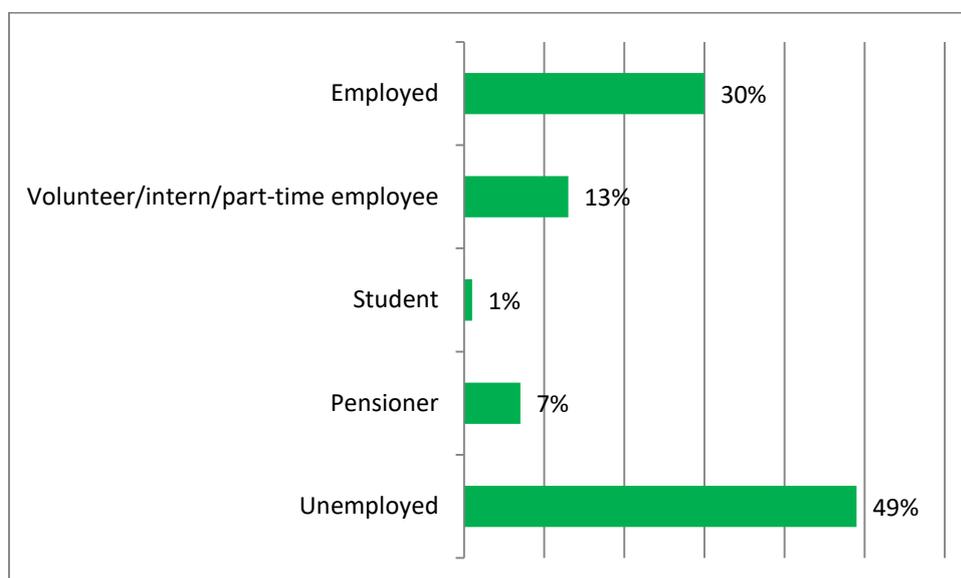
As regards ethnic background of interviewed members from vulnerable population groups, 50% are Macedonians, and around 35% are Roma, which shows that, in addition to Roma people as separate group of interviewees under this analysis, interviews were conducted with Roma who intersect with identities of other communities that are subject of this analysis. Among other interviewees, 9% are Albanians, 3% are Serbs, 2% are Turks, 1 interviewee is Bosniak and 1 interviewee indicated “other” in the column for ethnic background.

Chart no. 2: Structure of interviewees according to their ethnic background



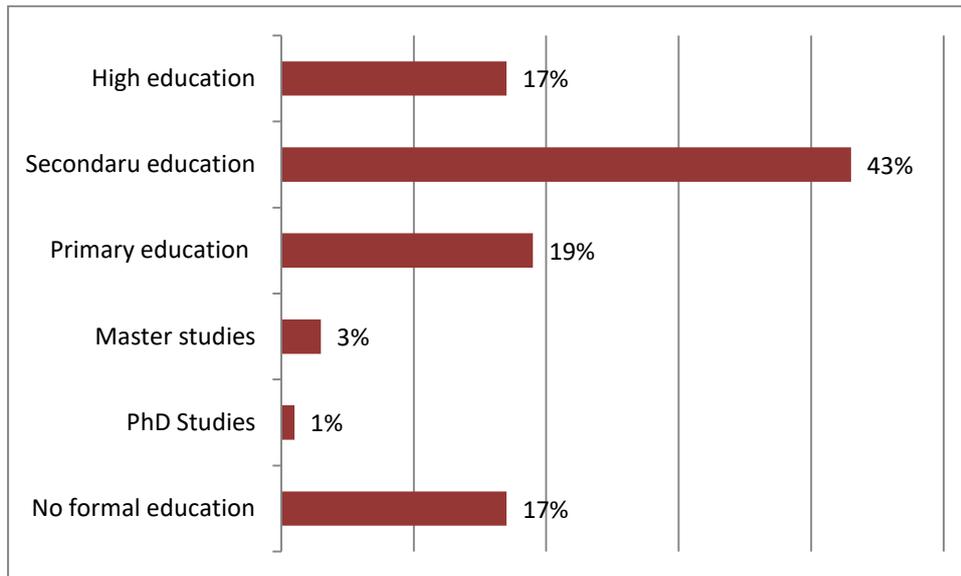
Vast majority of interviewees (97%) live in urban areas (Skopje, Prilep, Strumica, Tetovo, Kavadarci, Gostivar, Veles, Kumanovo, Ohrid, Struga and Bitola) and only 3% of them live in rural areas.

Chart no. 3: Structure of interviewees according to their employment status



Interviewees indicated different employment status. Almost half (49%) of interviewees from all vulnerable groups are unemployed, 30% are employed, 13% are engaged as volunteers, interns or part-time employees, 7% are pensioners and 1 interviewee is student.

Chart no. 4: Structure of interviewees according to their education



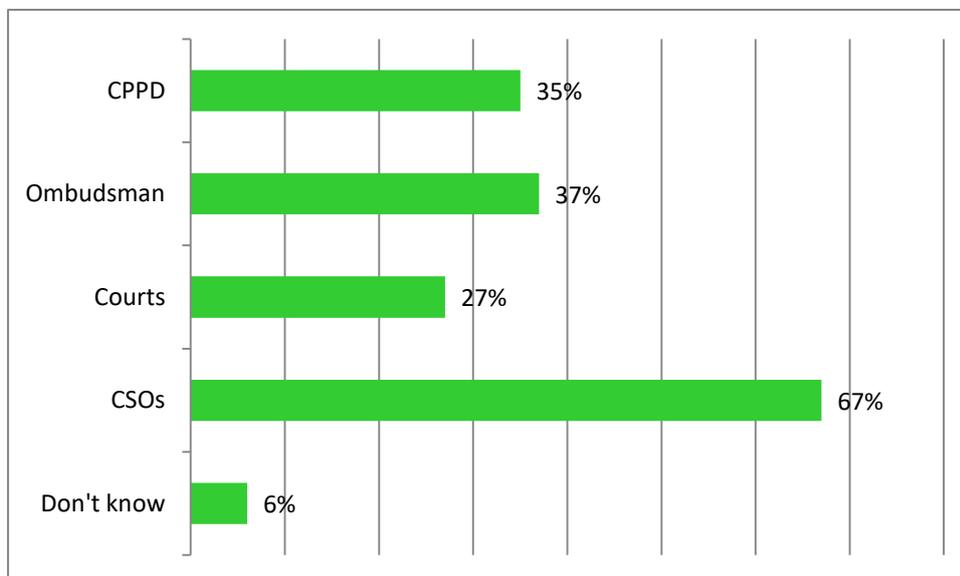
As regards their education background, 43% of interviewees have completed secondary education, 19% have completed primary education, 17% do not have formal education, 17% have completed higher education, 4 interviewees have completed Master studies and 2 interviewees have PhD degrees.

5. KNOWLEDGE ABOUT THE DISCRIMINATION ISSUE AND LEGAL POSSIBILITIES FOR PROTECTION

Almost all members of marginalized communities (94%) know where to seek protection in case of discrimination, while 6% of them are unaware of legal possibilities for protection against discrimination. However, data show that Roma, sex workers, people using drugs, LGBTI people and persons with disabilities lack information about different mechanisms for protection against discrimination.

Two-thirds of interviewees from vulnerable groups stated that in case of discrimination they could seek assistance from civil society organizations (67%), which could be expected having in mind that members of vulnerable population groups were included in this research through civil society organizations with which they have established regular communication and some of them are activists and are involved in implementation of activities of these organizations. This information corresponds with data from previous research studies on access to justice for marginalized communities and confirms that small share of them take action to have their legal problems solved, and when they seek assistance, they usually address civil society organizations.

Chart no. 5: Knowledge about legal possibilities for protection against discrimination

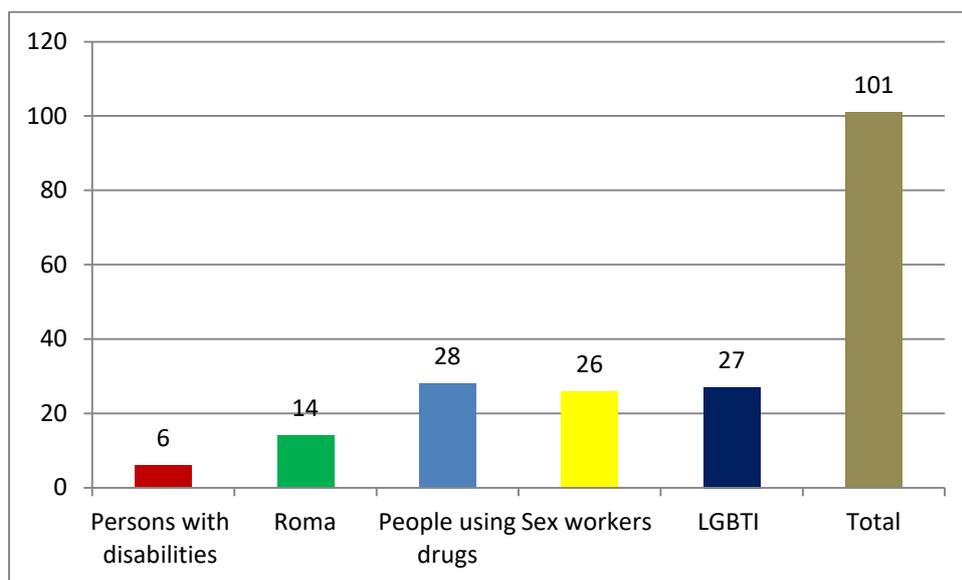


Every third member of vulnerable population groups would address the Ombudsman (37%) or CPPD (35%) for protection against discrimination, while 27% of them would address the courts (see Chart no.5).

Members of marginalized communities enlisted additional mechanisms for protection against discrimination, whereby 11 of them indicated the police, 3 interviewees indicated attorneys-at-law, and 1 interviewee each indicated the Social Work Centre, Commission for Equal Opportunities, healthcare facilities and the community.

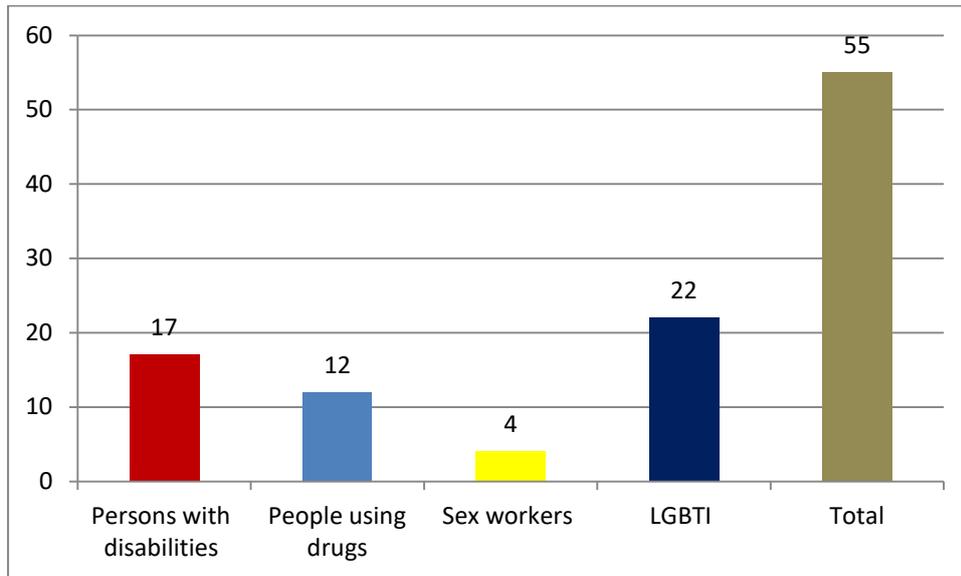
High level of knowledge about civil society organizations as mechanism for protection against discrimination is observed among persons using drugs (n=28), LGBTI people (n=27) and sex workers (see Chart no.6).

Chart no. 6: Number of interviewees (per vulnerable group) who have knowledge about civil society organizations



Highest level of knowledge about the Ombudsman's role is observed with LGBTI people, followed by persons with disabilities and people using drugs (see Chart no.7).

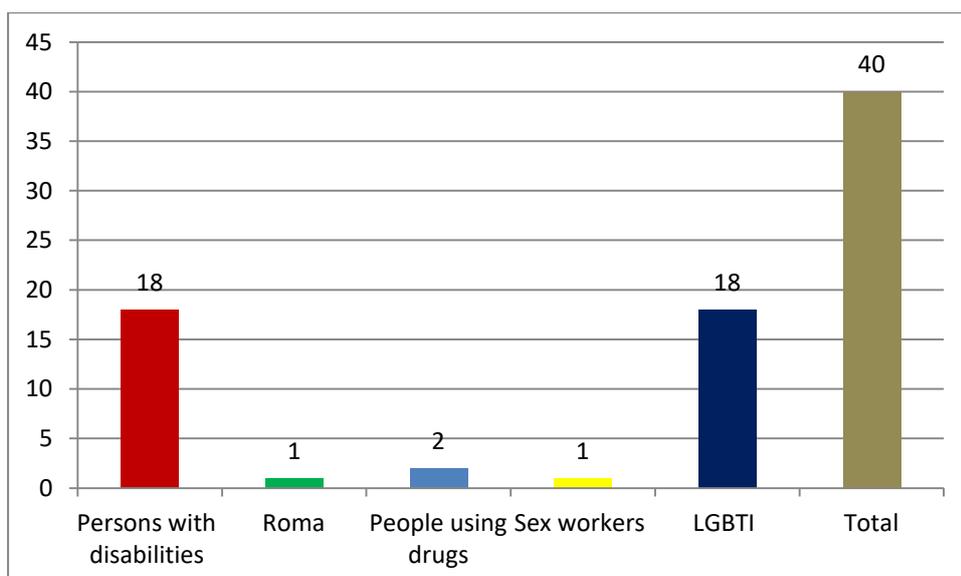
Chart no. 7: Number of interviewees (per vulnerable group) who have knowledge about the Ombudsman



The same level of information is noted in regard to CPPD. LGBTI people indicated highest level of knowledge about this protection mechanism compared to interviewees from other vulnerable population groups.

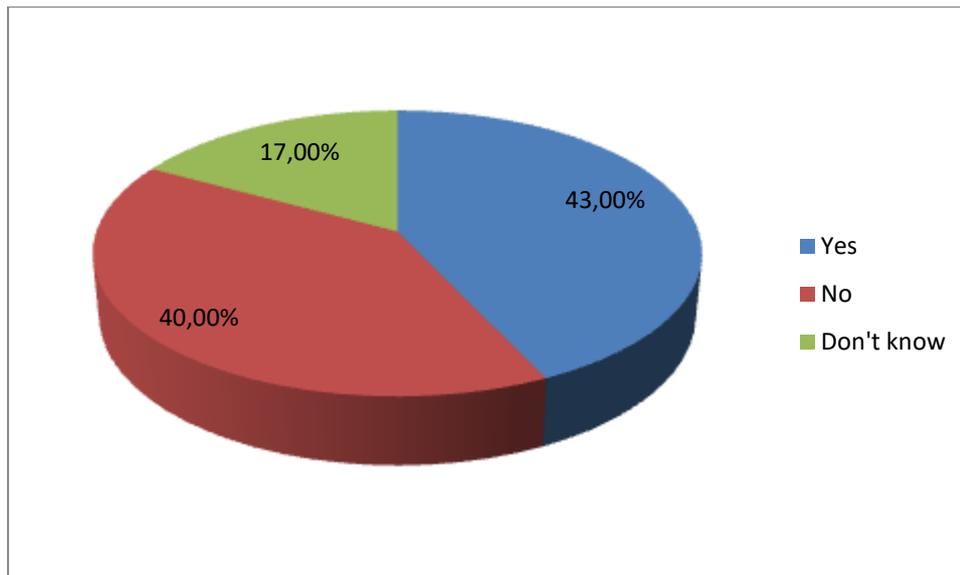
As regards court protection against discrimination, persons with disabilities (18) and LGBTI people (18) are better informed about this legal mechanism for protection against discrimination (see Chart no.8).

Chart no. 8: Number of interviewees (per vulnerable group) who have knowledge about the courts



Summary data about the level of knowledge about different mechanisms for protection against discrimination per vulnerable group provides the conclusion that LGBTI people⁶ have the highest level of knowledge about possibilities for protection compared to other vulnerable population groups. In general, it could be concluded that vulnerable groups have insufficient information about different mechanisms for protection against discrimination.

Chart no. 9: Knowledge about the Law on Prevention and Protection against Discrimination

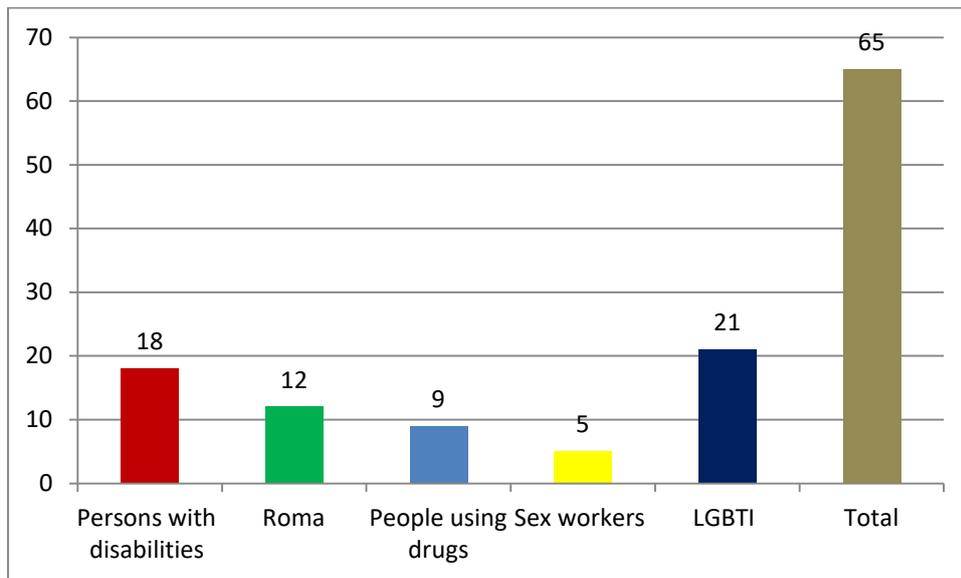


This confirms information that 57% of vulnerable population groups are not aware about existence of the new Law on Prevention and Protection against Discrimination. Interviewees who indicated knowledge about existence of separate law have learned thereof from civil society organizations (32%) and the media (18.6%). However, concerns are raised with the fact that no interviewees were informed about existence of this law from state bodies.

As regards the structure of interviewees who have knowledge about the law's existence, higher shares of LGBTI people (n=21) and persons with disabilities (n=18) indicated knowledge about this piece of legislation, unlike Roma people (n=12), people using drugs (n=9) and, especially, sex workers, who are less informed about existence of separate law on protection against discrimination (see Chart no.10).

⁶ Majority of LGBTI people are activists in civil society organizations and therefore they are better informed about different possibilities for protection against discrimination.

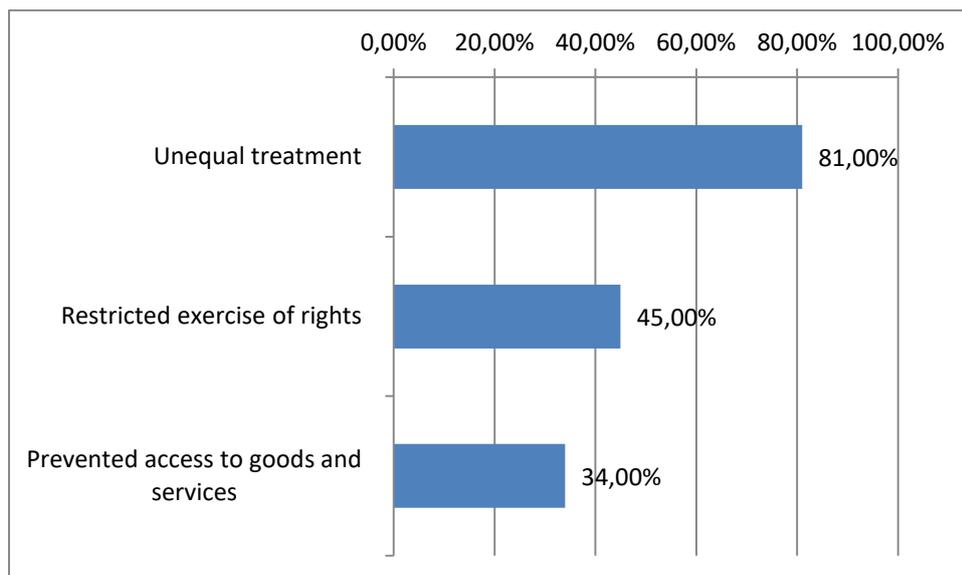
Chart no. 10: Number of interviewees (per vulnerable group) who have knowledge about the Law on Prevention and Protection against Discrimination



6. PERSONAL EXPERIENCES OF VULNERABLE POPULATION GROUPS WITH DISCRIMINATION

Almost all members of vulnerable groups covered with this research have certain perceptions about what is discrimination, which are basic elements of discrimination and how it affects people.

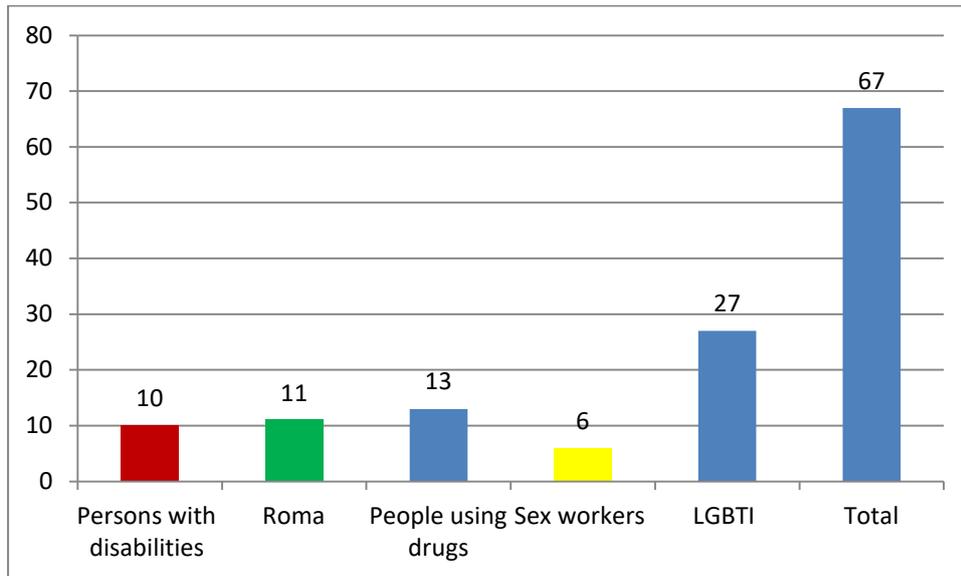
Chart no. 11: Interviewees' understanding of discrimination



High share of interviewees (81%) understand discrimination as unequal treatment. Proportionally, 27 of 30 interviewees who use drugs and are members of LGBTI community, 25 sex workers, 22 Roma and 21 persons with disabilities recognize unequal treatment as manifestation of discrimination.

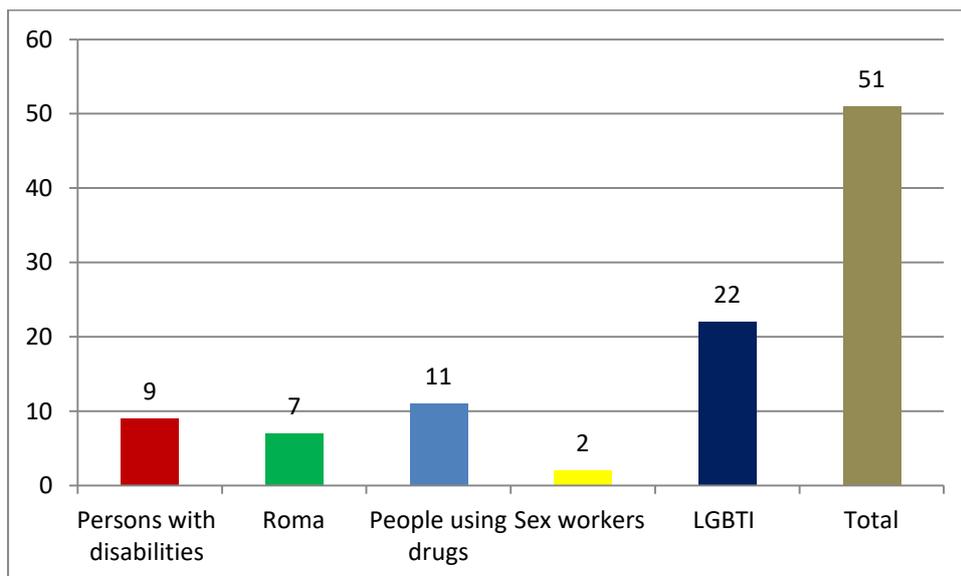
At the same time, portion of vulnerable groups (45%) believe that discrimination implies restricted exercise of citizens' rights. More specifically, LGBTI people showed greater knowledge about this form of discrimination, with 27 of 30 LGBTI interviewees indicating that discrimination implies restricted exercise of rights compared to persons using drugs (n=13), Roma (n=11), persons with disabilities (n=10) and sex workers (n=6), which less frequently defined discrimination as restricted exercise of rights (see Chart no. 12).

Chart no. 12: Number of interviewees (per vulnerable group) who believe that restricted exercise of rights amounts to discrimination



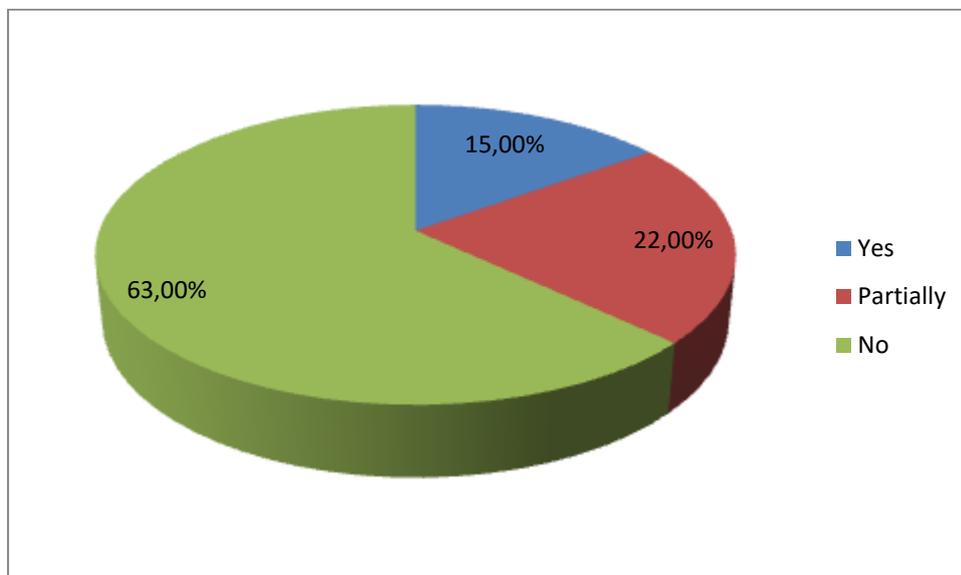
Every third interviewee (34% or 51 individuals) believes that prevented access to goods and services amounts to discrimination. In that, this element of discrimination was most frequently recognized by members of LGBTI community (n=22), followed by people using drugs (n=11) and persons with disabilities (n=9).

Chart no. 13: Number of interviewees (per vulnerable group) who believe that prevented access to goods and services amounts to discrimination



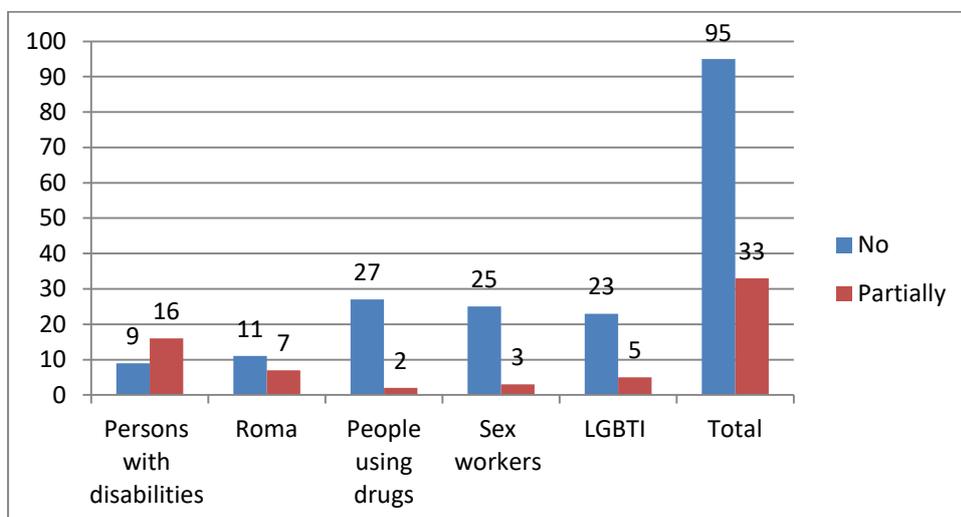
Moreover, 5 interviewees added other categories to explain what discrimination means to them. Hence, one of them indicated that discrimination means “being forced to live as somebody else”, while another responded “inequality, unequal treatment and prejudices”, and “double standards, restricted rights by the state”.

Chart no. 14: Enjoyment of equal treatment



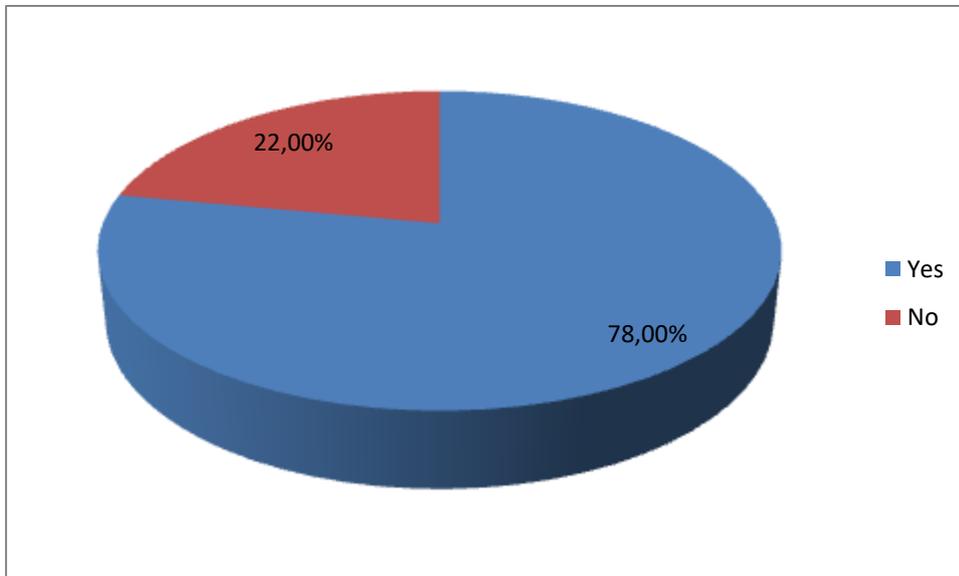
On the other hand, high share (two-thirds) of interviewed members from vulnerable population groups believe they do not enjoy equal treatment in the society, while 22% of them indicated they partially enjoy equal treatment (see Chart no. 14). Three vulnerable population groups are particularly affected by lack of equal treatment, those being: people using drugs, sex workers and LGBTI people. Highest number of responses indicating partially equal treatment is observed among persons with disabilities (see Chart no. 15).

Chart no. 15: Number of interviewees (per vulnerable group) who believe they do not enjoy equal treatment or they partially enjoy equal treatment in the society



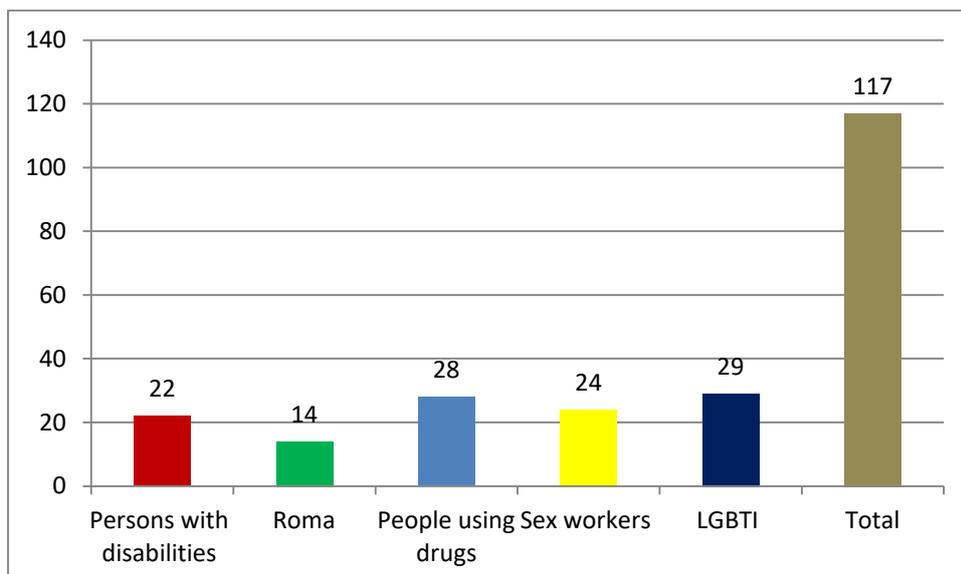
More than two thirds (78%) of interviewees from vulnerable population groups have been discriminated.

Chart no. 16: Have they been discriminated



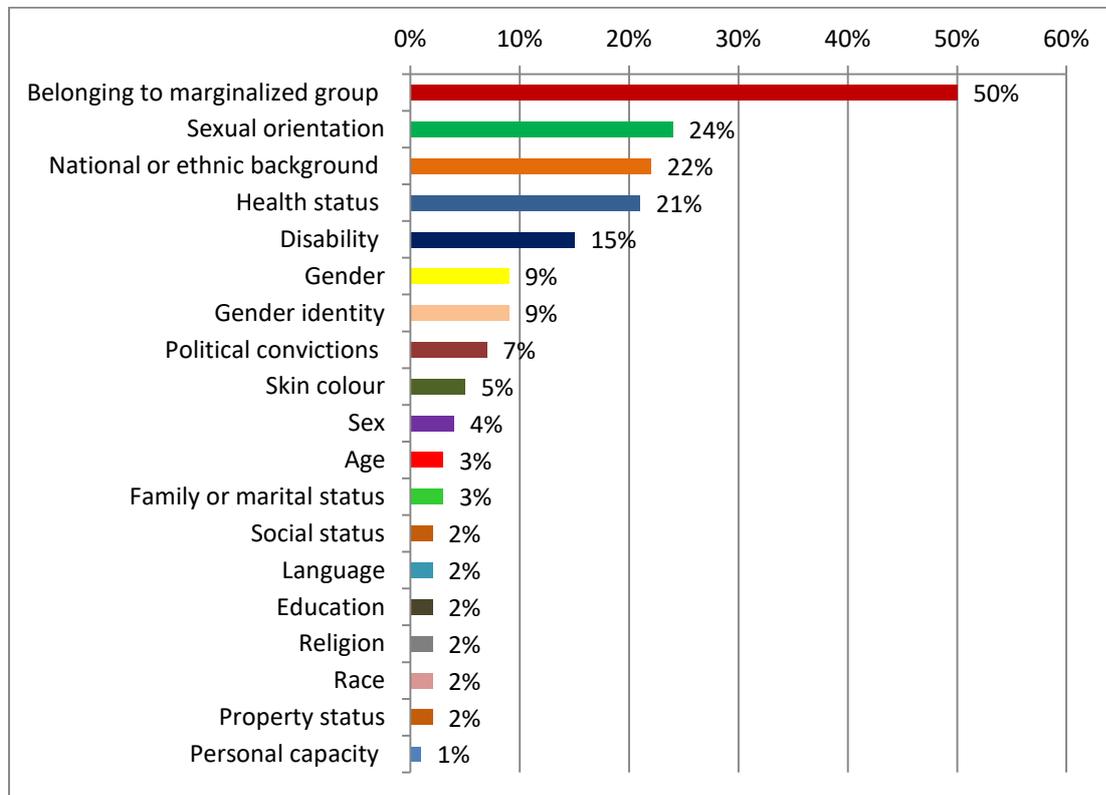
Most susceptible to discrimination are LGBTI people (n=29) and people using drugs (n=28), followed by sex workers (n=24), persons with disabilities (n=22) and Roma (n=14).

Chart no. 17: Number of interviewees (per vulnerable group) who believe they have been discriminated



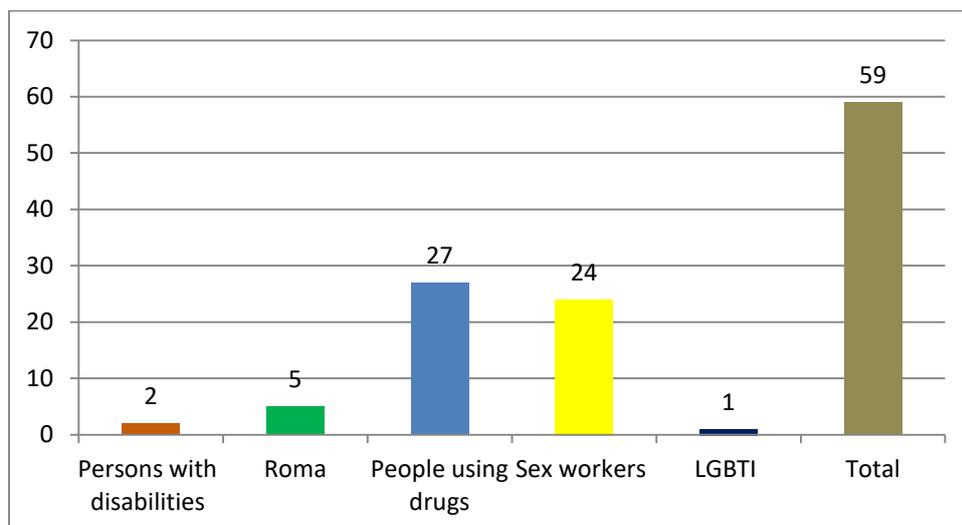
Most frequently indicated discrimination grounds are: belonging to marginalized group (50%), sexual orientation (24%), national or ethnic background (22%), health status (21%) and disability (14%). Other discrimination grounds are less represented (see Chart no.18).

Chart no. 18: Discrimination grounds



As it could be expected, majority of marginalized population groups are victims of discrimination on the basis of their belonging to these groups. Hence, this type of discrimination is most frequently suffered by people using drugs (n=27) and sex workers (n=24). For detailed breakdown of responses see Chart no. 19.

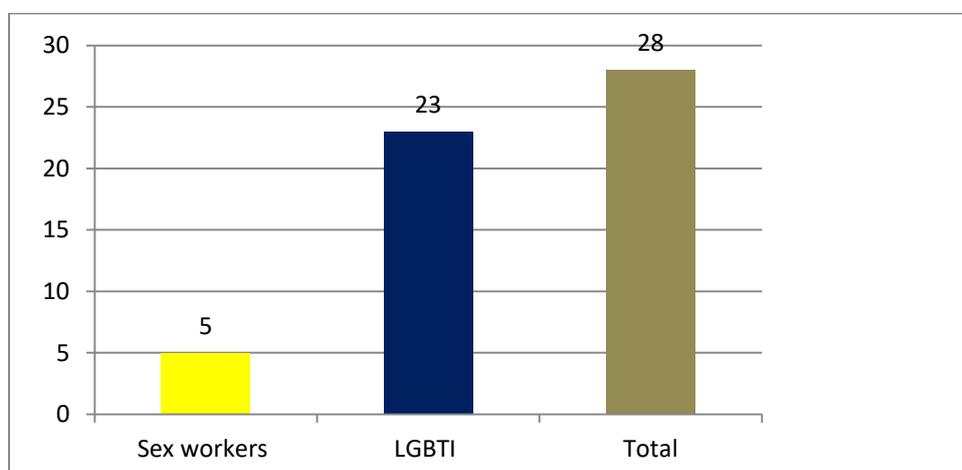
Chart no. 19: Number of interviewees (per vulnerable group) who have been discriminated on the basis of belonging to marginalized group



LPPD is rare example of legislation that includes belonging to marginalized group as separate discrimination ground, which is defined as “group of individuals that are united by specific status in the society, are subject of prejudice, share certain characteristics that make them susceptible to discrimination and/or violence and are less likely to exercise and protect their rights and freedoms”. Several elements need to be in place for this discrimination ground to be acknowledged and they include “specific status in the society” and “susceptibility to certain types of violence”. Marginalized status of these communities makes them more vulnerable to violence and discrimination and therefore it does not surprise that most interviewees have been discriminated on the basis of belonging to marginalized group.

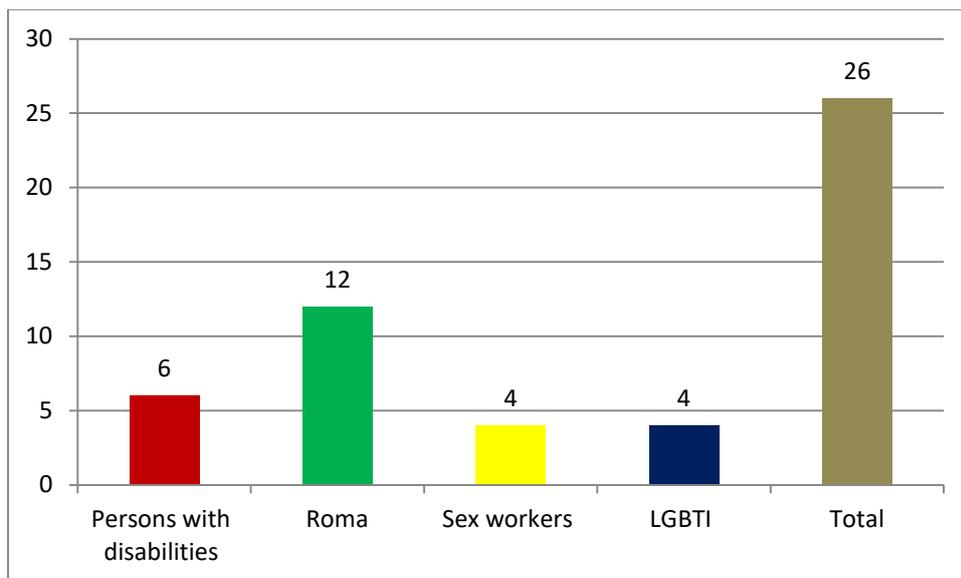
As it could be expected, sexual orientation was most frequently indicated as discrimination ground among LGBTI people and sex workers (see Chart no. 20).

Chart no. 20: Number of interviewees (per vulnerable group) who have been discriminated on the basis of sexual orientation



National or ethnic background is the third most frequently indicated discrimination ground, which is quite understandable having in mind that one of key communities covered by this analysis are Roma people, who are often victims of discrimination on the basis of ethnic or racial background.⁷ Persons with disabilities, people using drugs and LGBTI people are less frequently discriminated on the basis of their national or ethnic background (see Chart no.21).

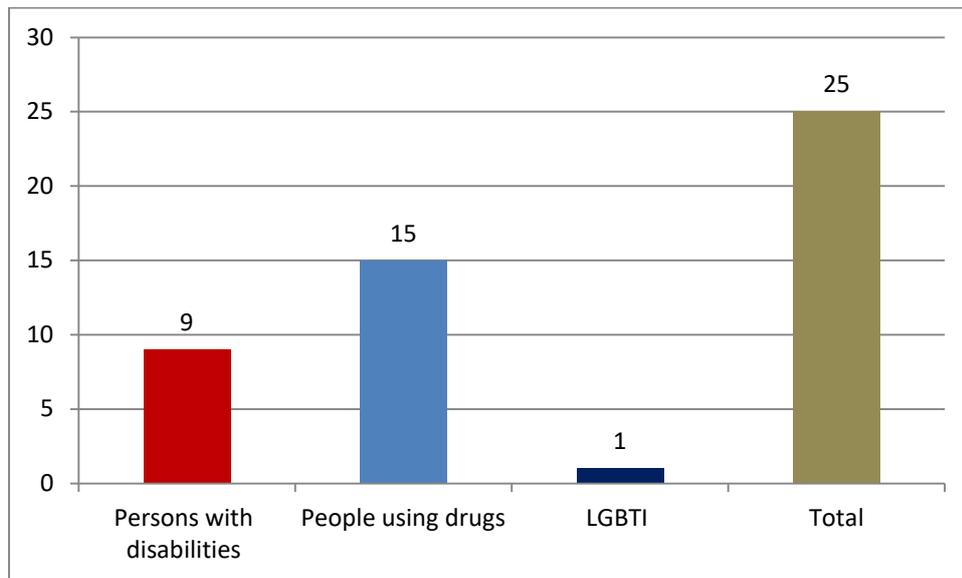
Chart no. 21: Number of interviewees (per vulnerable group) who have been discriminated on the basis of national or ethnic background



Discrimination on the basis of health status is most frequently indicated by people using drugs and persons with disabilities (see Chart no.22).

⁷ Center for Legal Research and Analysis. Analysis of the Status of Roma as Defendants in Criminal Proceedings in the Republic of Macedonia, 2017, pg. 8.

Chart no. 22: Number of interviewees (per vulnerable group) who have been discriminated on the basis of health status



Drug use is strong source of stigmatization and discrimination and therefore people using drugs are often faced with situations in which they are inadequately treated. Sometimes, drug use leads to addiction, which is qualified as health status that requires special treatment and support. Health status is discrimination ground that protects people from unequal treatment both on the basis of current and former health status. People who have once been labelled as drug users could suffer consequences and face discrimination also in the period when they no longer use or are no longer addicted to drugs.

Persons with disabilities most often interpret exercise of their rights through the medical model of disability. Therefore, their health status is often indicated as discrimination ground, unlike discrimination on the basis of disability, which is not always recognized as discrimination ground by them.

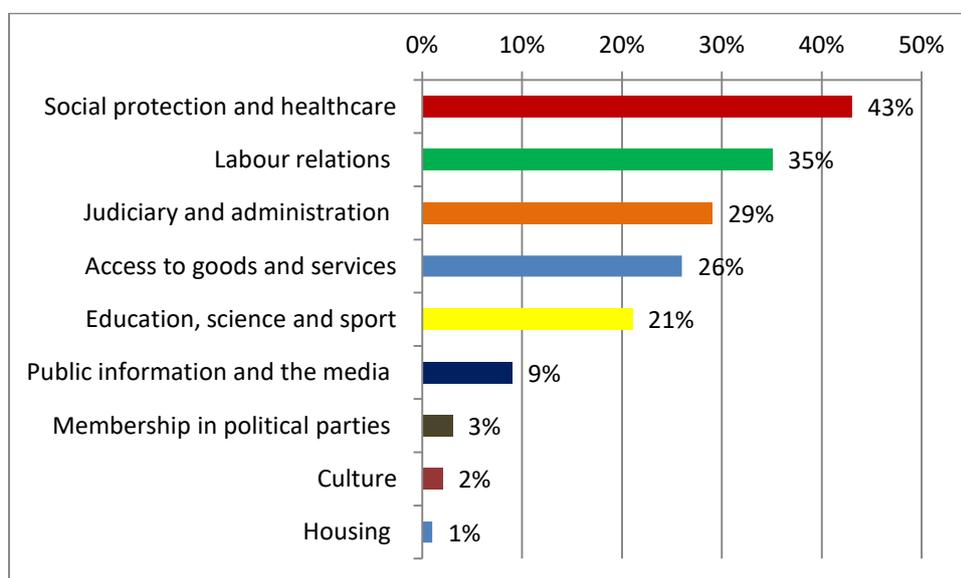
Comparison of data related to discrimination grounds among different vulnerable population groups provides the following breakdown: persons with disabilities most often face discrimination on the basis of disability or health status; Roma are discriminated on the basis of national or ethnic background; people using drugs are mainly discriminated on the basis of belonging to marginalized group and their health status; sex workers are discriminated on the basis of belonging to marginalized group ;and LGBTI people are discriminated on the basis of their sexual orientation.

Table no. 1: Number of interviewees (per vulnerable group) and most frequent discrimination grounds

	Persons with disability	Roma	People using drugs	Sex workers	LGBTI	Total
Belonging to marginalized group	2	5	27	24	1	59
Sexual orientation	0	0	0	5	23	28
National or ethnic background	6	12	0	4	4	26
Health status	9	0	15	0	1	25
Disability	17	0	0	0	0	17

As regards areas in which interviewed members of vulnerable groups most often suffered discrimination, majority of them (43%) have been discriminated in the area of social protection; labour relations (35%); judiciary and administration (29 %); access to goods and services (26%), and education, science and sport (21%). Small share of interviewees from vulnerable groups faced discrimination in other areas of societal life (see Chart no. 23).

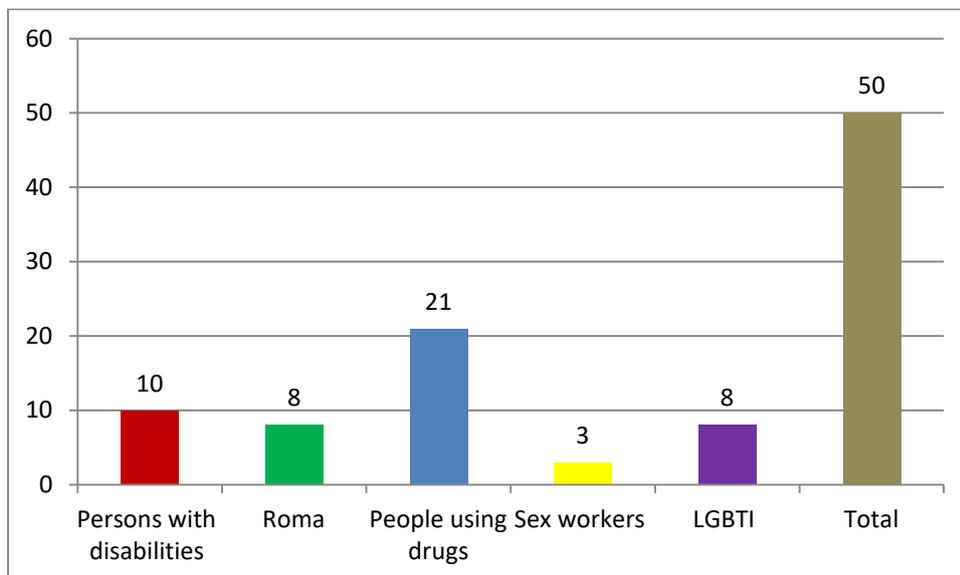
Chart no. 23: Areas of discrimination



Vast number of marginalized group members was discriminated in more than one area of societal life, i.e. 117 interviewees that have been discriminated reported a total of 198 cases of discrimination in above-enlisted areas.

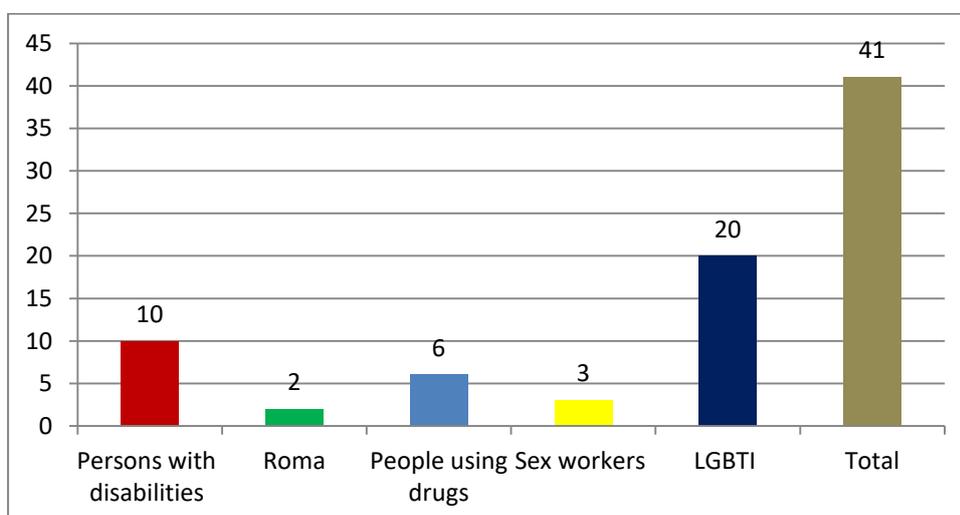
Discrimination in the area of social protection and healthcare was most frequently indicated by people using drugs (n=21), followed by persons with disabilities, Roma, LGBTI people and sex workers (see Chart no. 24).

Chart no. 24: Number of interviewees (per vulnerable group) who have been discriminated in the area of social protection and healthcare



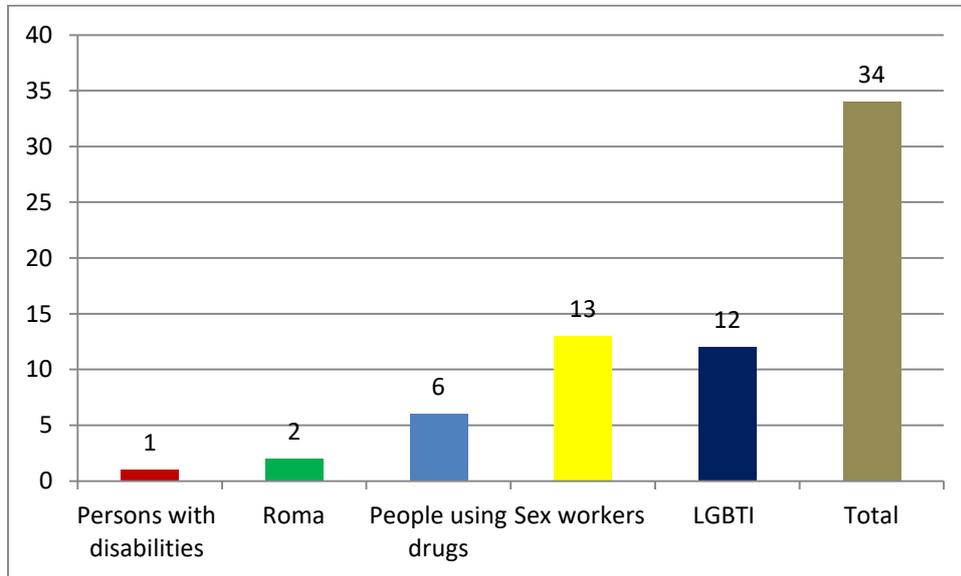
Discrimination in the area of labour relations was most frequently faced by members of LGBTI community, who accounted for almost half of all interviewees discriminated in this area, followed by persons with disabilities and people using drugs. Members of other vulnerable groups provided less frequent answers on discrimination in the area of labour relations (see Chart no. 25).

Chart no. 25: Number of interviewees (per vulnerable group) who have been discriminated in the area of labour relations



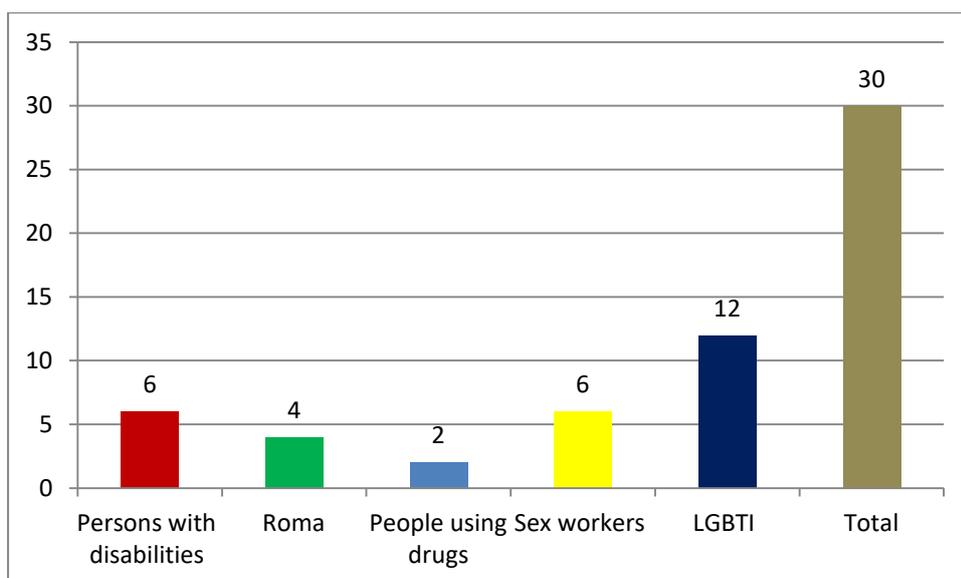
Sex workers, LGBTI people and people using drugs most frequently indicated discrimination in the area of judiciary and administration (see Chart no. 26).

Chart no. 26: Number of interviewees (per vulnerable group) who have been discriminated in the area of judiciary and administration



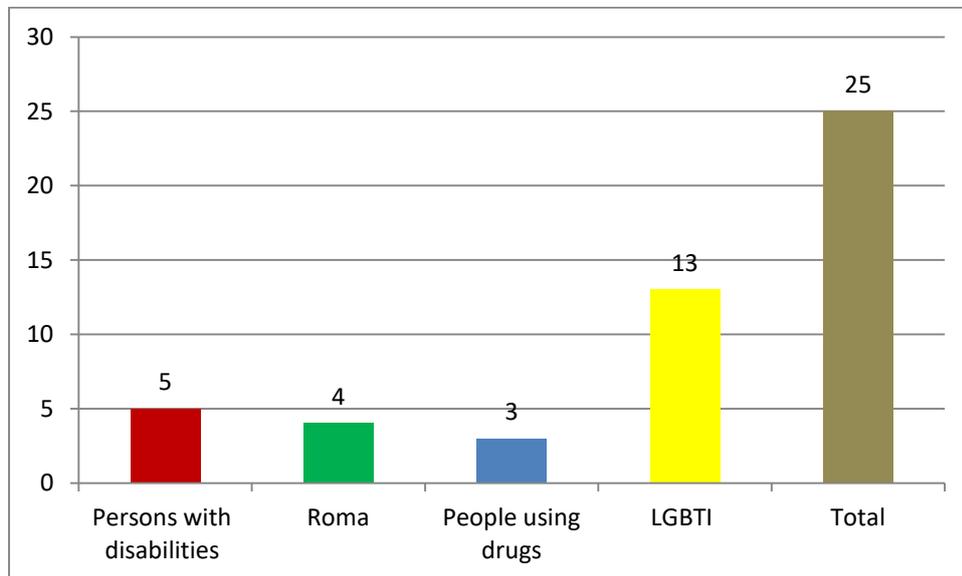
Access to goods and services is the most restricted area for members of LGBTI community as highest share of them indicated discrimination in this area (see Chart no. 27).

Chart no. 27: Number of interviewees (per vulnerable group) who have been discriminated in the area of access to goods and services



More than half of individuals discriminated in the area of education, science and sport are members of LGBTI community (see Chart no. 28).

Chart no. 28: Number of interviewees (per vulnerable group) who have been discriminated in the area of education, science and sport



Analysis of data about areas of discrimination in the context of different vulnerable population groups shows that persons with disabilities most often report discrimination in the area of social protection and healthcare and in the area of labour relations; Roma frequently reported discrimination in the area of social protection and healthcare; people using drugs reported discrimination in the areas of social protection, labour relations, and judiciary and administration; sex workers frequently reported discrimination in the area of judiciary and administration, and access to goods and services; LGBTI people reported discrimination in the area of labour relations, access to goods and services, and judiciary and administration (see Table no. 2).

Table no. 2: Number of interviewees (per vulnerable group) and most frequent areas of discrimination

Area of discrimination/vulnerable group	Persons with disabilities	Roma	People using drugs	Sex workers	LGBTI	Total
Social protection and healthcare	10	8	21	3	8	50
Labour relations	10	2	6	3	20	41
Judiciary and administration	1	2	6	13	12	34
Access to goods and services	6	4	2	6	12	30
Education, science and sport	5	4	3		13	25
Public information and the media	2	0	0	1	8	11
Membership in political parties	2	0	1	1	0	4
Culture	1	1	0	0	0	2
Housing	0	1	0	0	0	1

Data show that discrimination of marginalized communities is widespread in all areas of the society. Comparison of data with findings from other research studies provides the conclusion that state-of-affairs in relation to violation of rights and discrimination against marginalized communities has not been significantly changed. In particular, violation of labour rights, violations by the police and violations while serving imprisonment sentences are frequent problems faced by intravenous drug users.⁸ Sex workers frequently report problems in renting housing, access to public goods and services, problems with spouses/partners and with underage children.⁹

As regards practices of previous compositions of CPPD, the highest number of complaints was submitted in the area of employment and labour relations. Hence, 40% of total number of complaints (n=60) lodged in 2016 concerned the area of *employment and labour relations*. Next in frequency were complaints related to *access to public goods and services* (25%), *media and public information* (13%) and *judiciary and administration* (8%).¹⁰ In 2015, dominant number of complaints was lodged in the area of *employment and labour relations*. Hence, 30 from the total number of 70 complaints, accounting for 42%, were lodged in the area *employment and labour relations*. Second in

⁸ Cekovski, I., Dimitrievski, V. Legal Needs and Access to Justice for People Using Drugs and Sex Workers in the Republic of Macedonia, 2018, pg. 38.

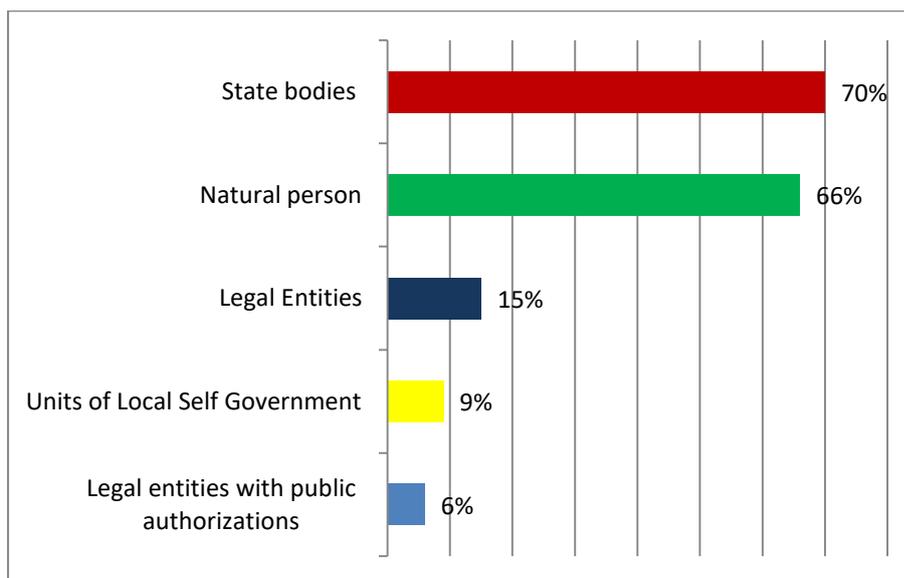
⁹ *Ibid.*, pg.38.

¹⁰ Commission for Prevention and Protection against Discrimination. 2016 Annual Report, March 2017, pg. 12.

frequency are complaints in the area *social protection* (n=14 or 20%), while 13 complaints did not indicate the area of discrimination.¹¹

Marginalized communities are victims of systemic discrimination, which is confirmed with results of this research. Namely, two-thirds of interviewees from vulnerable population groups were victims of discrimination by the institutions, i.e. 70% of them have been discriminated by state bodies, 9% of them have been discriminated by local self-government units, and 6% by legal entities with public authorizations. In that, people using drugs (n=24), sex workers (n=22) and LGBTI people (n=18) were most often discriminated by state bodies. Other interviewees indicated discrimination by natural persons (66%) and legal entities (15%). High share of natural persons who appear as discriminators are individuals, and they have committed discrimination when performing public authorizations and public services or when providing services at institutions or private companies.

Chart no. 29: Discriminators



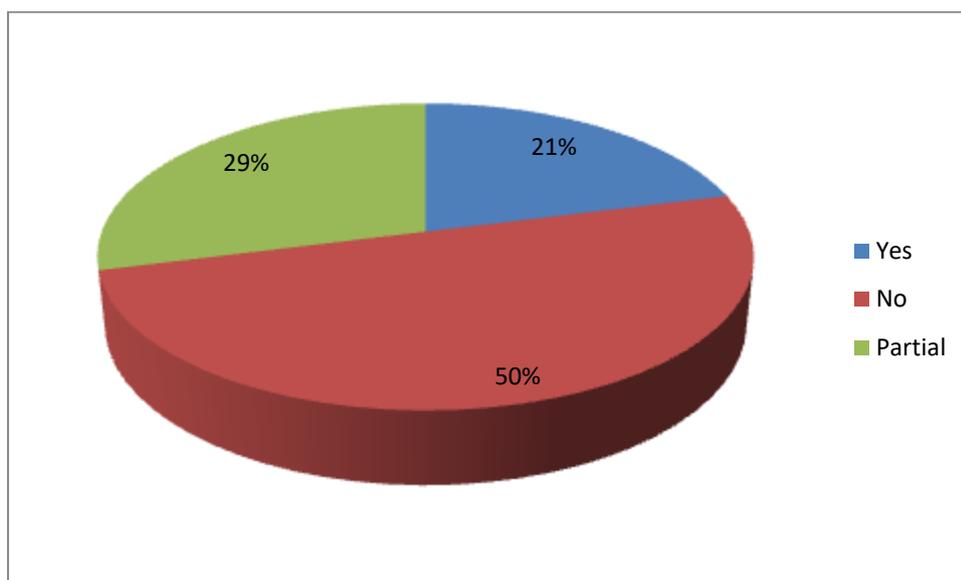
Roma, sex workers, persons using drugs, LGBTI people and persons with disabilities who have been discriminated also indicated other entities that have perpetrated discrimination, which allows clear image about natural persons that appear as discriminators in specific situations. They include colleagues, peers, family members, the media, banks, healthcare institutions, health professionals, police officers, accidental by-passers, University “Ss. Cyril and Methodius”, coffee shops, etc.

¹¹ Commission for Prevention and Protection against Discrimination. 2015 Annual Report, March 2016

7. KNOWLEDGE ABOUT WORK OF THE COMMISSION FOR PREVENTION AND PROTECTION AGAINST DISCRIMINATION

Roma, sex workers, people using drugs, persons with disabilities and LGBTI people are insufficiently informed about CPPD's work.

Chart no. 30: Knowledge about work of the Commission for Prevention and Protection against Discrimination

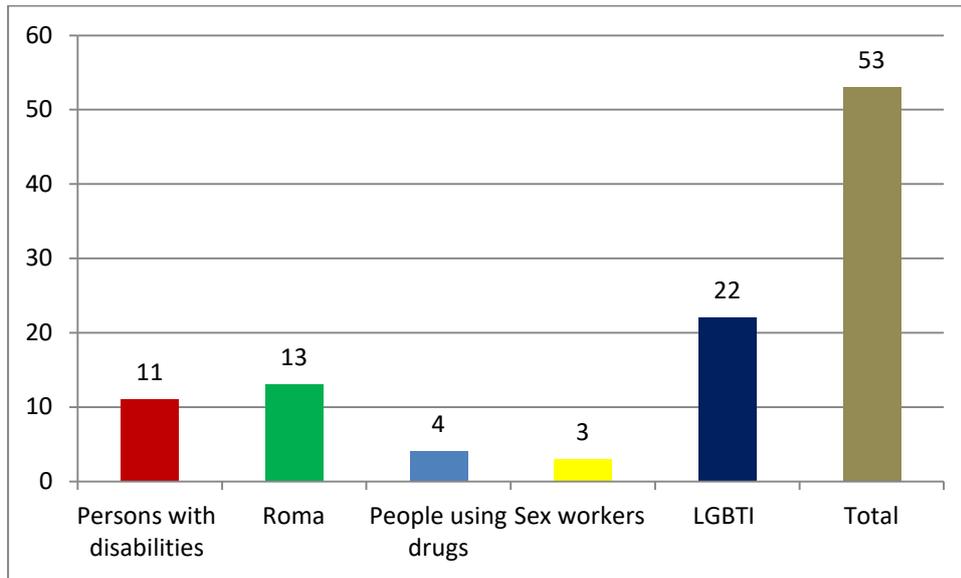


The observation that vulnerable population groups do not have sufficient knowledge about CPPD is confirmed by the fact that the share of interviewees who indicated full or partial knowledge about CPPD's competences and its role is equal to the share of those who do not have such knowledge. In particular, 21% of interviewees from vulnerable groups indicated knowledge about CPPD's role and competences, while 29% of them reported partial knowledge, compared to half of interviewees (50%) who do not have any knowledge about CPPD's role and competences (see Chart no. 30).

LGBTI interviewees showed highest level of knowledge about existence and work of CPPD (n=22),¹² followed by Roma and persons with disabilities. Sex workers and people using drugs have the least knowledge about CPPD's role and competences (see Chart no. 31).

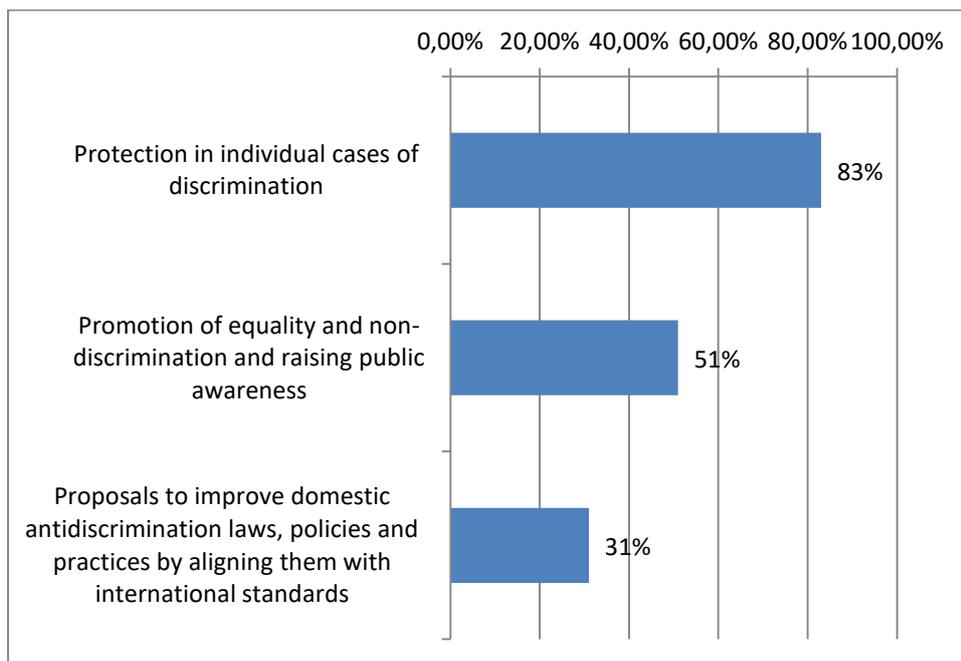
¹² Having in mind that the research included people in regular communication with civil society organizations and are actively involved in their work on protection against discrimination.

Chart no. 31: Number of interviewees (per vulnerable group) who have knowledge about CPPD's work



As regards knowledge of specific competences entrusted to CPPD, interviewees are mainly familiar with the Commission's protective function in individual cases of discrimination (83%); half of interviewees from vulnerable groups (51%) recognize its role in promotion of equality and raising public awareness; while one-third of interviewees from vulnerable groups (31%) are familiar with the Commission's role related to advancement of the national legal framework on protection against discrimination (see Chart no. 32).

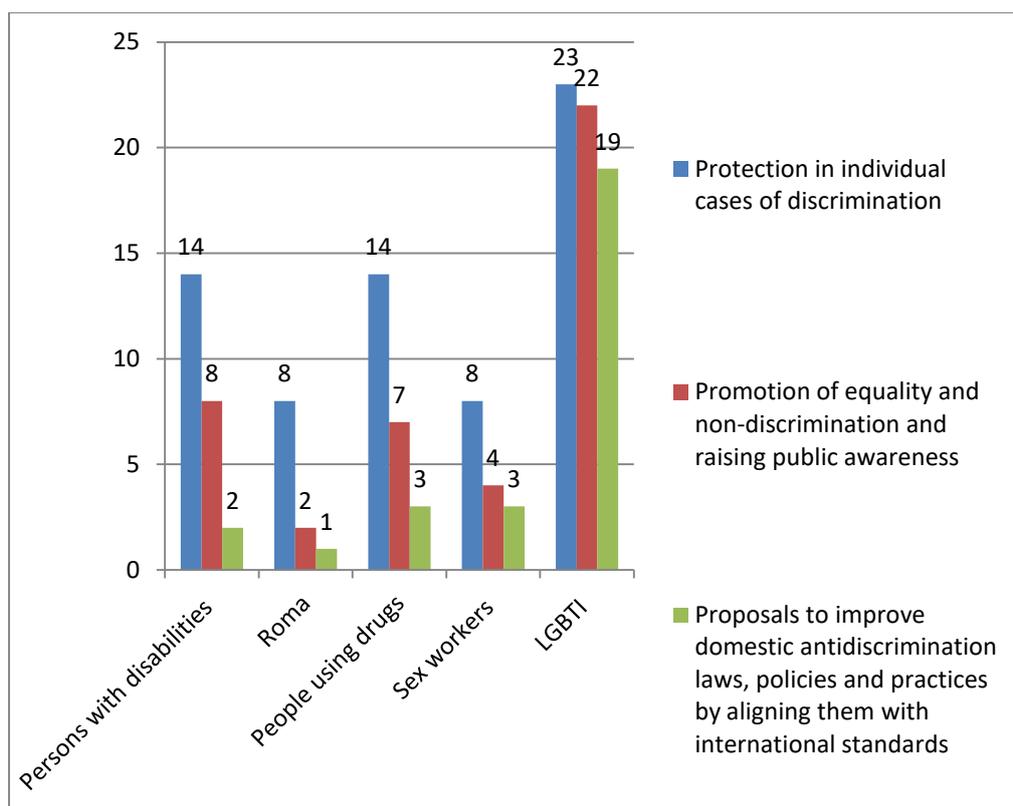
Chart no. 32: Knowledge about CPPD's competence



Four interviewees also indicated other competences of CPPD, as follows: to act as interfering party in court processes; to deliver training to employees in the police, state bodies and institutions; to initiate misdemeanour proceedings; to protect trans- and LGBTI community, and to provide legal assistance.

Members of different vulnerable population groups show variable level of knowledge about the Commission’s competences. LGBTI interviewees have significantly higher level of knowledge about the protection function performed by CPPD (n=23), and about its role in raising public awareness (n=22) and improving the national legal framework on protection against discrimination (n=19), compared to members of other vulnerable population groups. They are followed by persons with disabilities, while Roma and sex workers show the lowest level of knowledge about specific competences of the Commission (see Chart no. 33).

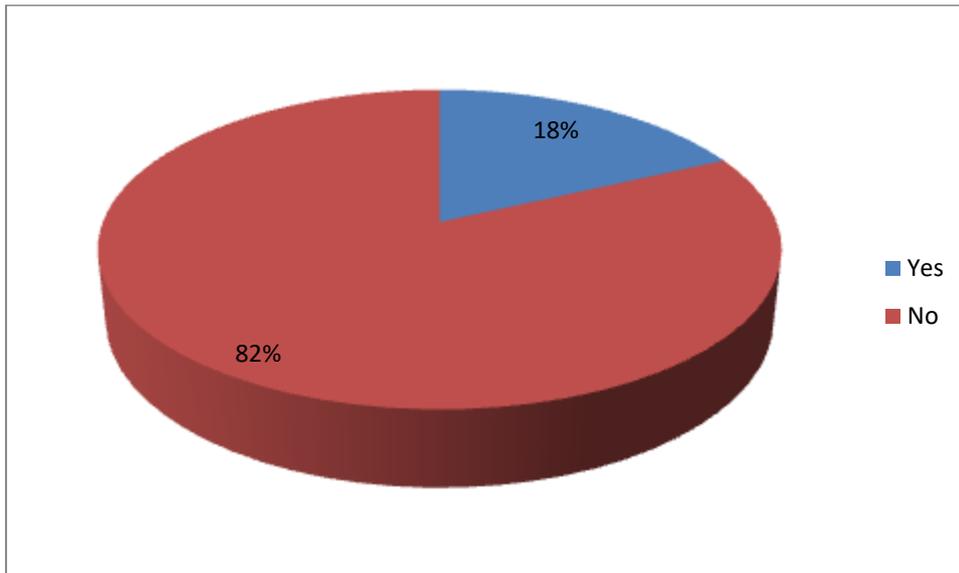
Chart no. 33: Number of interviewees (per vulnerable group) who have knowledge about CPPD’s competences



Although 50% of interviewees from vulnerable population groups have knowledge about key functions and competences of CPPD, concerns are raised with the fact that half of them are not familiarized with CPPD. Moreover, varying level of knowledge among different vulnerable groups

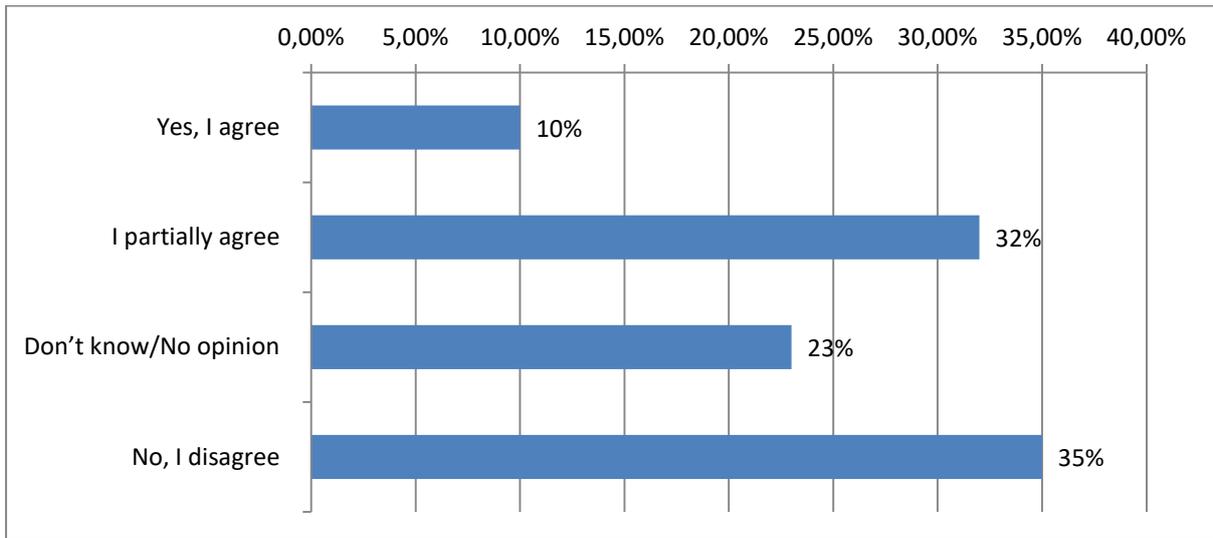
emphasizes the need for additional efforts to inform marginalized communities with new law-mandated competences of CPPD and the manner in which they are performed. High 82% of interviewees from vulnerable population groups do not know that underway is formation of new CPPD, while only 18% of them are aware of this fact.

Chart no. 34: Number of interviewees who know that underway is formation of new CPPD



In this context, it is interesting to elaborate perceptions of Roma, sex workers, people using drugs, LGBTI people and persons with disabilities whether state-of-affairs in terms of equal treatment and protection against discrimination in the state has improved in the last 5 years. Their responses show that only 10% of interviewees from vulnerable population groups believe that state-of-affairs in terms of equal treatment and protection against discrimination in the state have improved in the last 5 years, while 32% of them indicated partial agreement with this statement. On the other hand, high share of interviewees (35%) believes that state-of-affairs in terms of discrimination in the last 5 years has not improved, while 23% of interviewees do not have opinion about this question.

Chart no. 35: Number of interviewees who believe state-of-affairs related to discrimination have improved in the last years

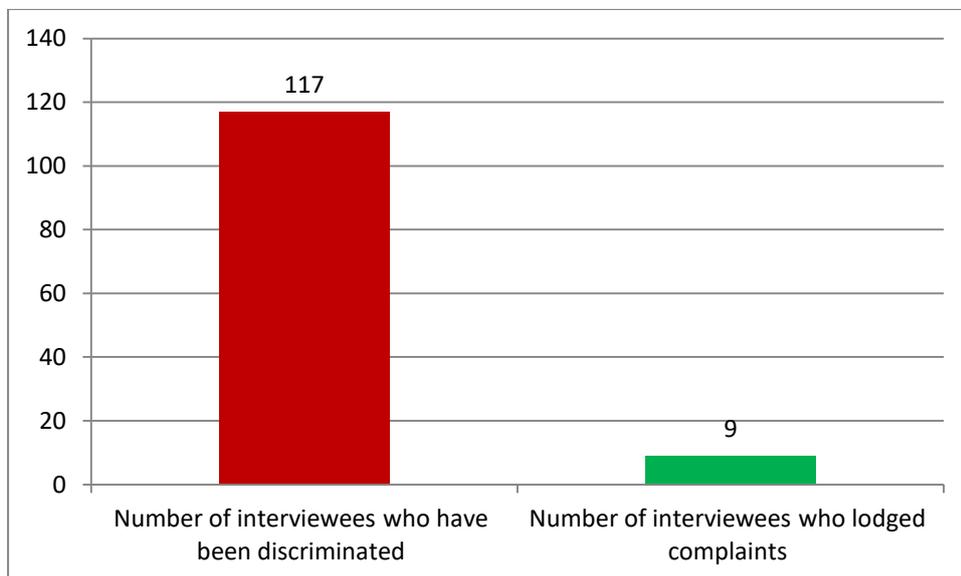


Portion of Roma, sex workers, people using drugs, LGBTI people and persons with disabilities express mild optimism that state-of-affairs related to equal treatment and protection against discrimination are improving in spite of their status and the systemic discrimination they are exposed to, but also in spite of their personal experiences with the justice labyrinths they have reported in their answers.

8. PERSONAL EXPERIENCES WITH THE PROCEDURE FOR PROTECTION AGAINST DISCRIMINATION AND VIEWS ON TRANSPARENCY, ACCOUNTABILITY AND EFFECTIVENESS OF THE COMMISSION

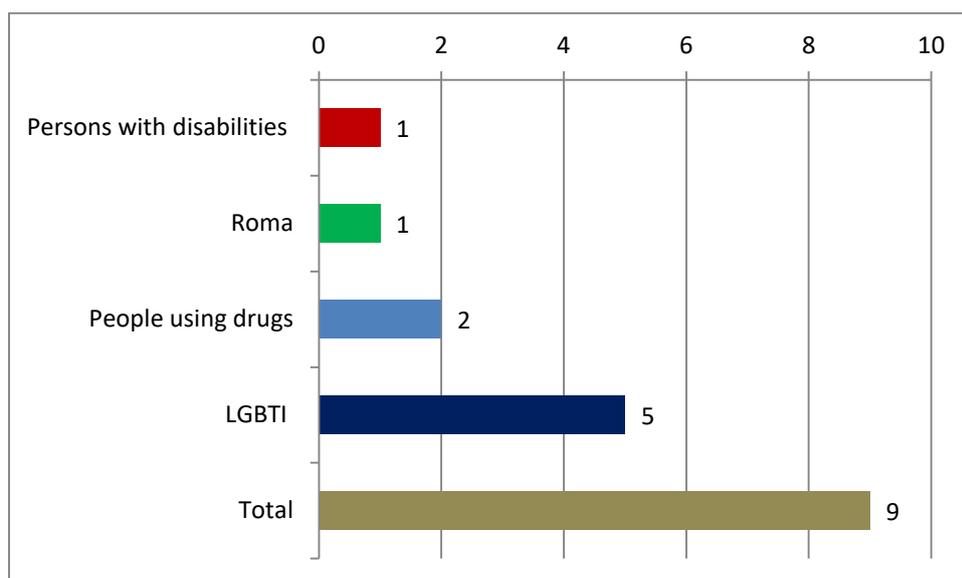
Only 9 interviewees lodged complaints before CPPD for protection against discrimination, which is indicative of the low number of procedures led by members of vulnerable population groups. There is discrepancy between the exceptionally low number of complaints and the high share of interviewees (78% or n=117) who reported that they have been victims of discrimination (see Chart no. 36).

Chart no. 36: Number of interviewees who have been discriminated compared to the number of interviewees who lodged complaints before CPPD



All 9 interviewees who lodged complaints also received support and free legal aid from civil society organizations. Most of these complaints were lodged by LGBTI people (n=5). Persons using drugs lodged 2 complaints, while Roma and persons with disabilities lodged 1 complaint each (see Chart no. 37). This information corresponds to proactive involvement of LGBTI people in activities of civil society organizations that work in this area.

Chart no. 37: Number of complaints (per vulnerable group) lodged before CPPD



One decade after LPPD was adopted the situation in terms of non-discrimination is worrying and discouraging. These observations are confirmed by research findings of other civil society organizations which indicate that reasons, inter alia, are identified in low legal literacy and insufficient knowledge about protection mechanisms, systemic discrimination, and distrust in the institutions among vulnerable population groups.

Competent bodies and institutions need to address this situation in systemic and long-term manner by developing comprehensive, effective and applicable non-discrimination policies, efficient institutional cooperation, full engagement and commitment on the part of CPPD in implementation of promotional and informative activities, field work, affirmation and education of marginalized communities with its competences and other legal possibilities for protection against discrimination, as well as regular monitoring on implementation of CPPD's decisions and inclusion of these population groups in mainstream society.

a) Views on CPPD's effectiveness

This analysis targeted effectiveness of the Commission through the prism of personal experiences and perceptions of Roma, sex workers, people using drugs, LGBTI people and persons with disabilities. The Commission's effectiveness was assessed against several parameters: reasonable deadline for decision-making by the Commission; the procedure's outcome and the Commission's opinion upon complaints; interviewees' satisfaction with and opinion whether discrimination was resolved.

Table no. 3: Reasonable deadline for decision-making

Do you believe that CPPD took decision in your case within reasonable deadline?	Total
Yes, reasonable deadline	2
Don't know	4
No, procedure was prolonged	3
TOTAL	9

Concerns are raised with the fact that 4 interviewees answered they do not know, i.e. they do not have opinion about the length of the deadline in which the Commission acted upon their complaints. Under circumstances when marginalized communities lack additional information, this could mean they do not have or have not received sufficient data about their procedures led before the Commission and about the law-stipulated deadline in which CPPD is obliged to take its decision.

Almost all interviewees who lodged complaints also believe that the decision-making deadline should be shorter, while 1 interviewee does not know. Under the new legal provisions, relevant deadline for the Commission to take its decision is shortened to 60 days. It remains to be seen how this deadline will be implemented in the practice and whether CPPD will take other necessary measures to improve its effectiveness and efficiency.

Table no. 4: Whether the Commission established discrimination

Did CPPD establish discrimination in your case?	Total
Yes	1
No	5
I'm still waiting for response	3
TOTAL	9

The Commission has established discrimination only in one case of complaints lodged by interviewees. As regards the outcome of remaining 8 complaints, the Commission established there is no discrimination in 5 cases, while 3 cases are still pending decision (see Table no. 5).

Table no. 5: Outcome of the procedure led before the Commission

What was the outcome of the procedure led before CPPD?	Total
Opinion that there is discrimination, with recommendation	1
Opinion that there is no discrimination	4
Procedure was not initiated	1
I'm still waiting for response	3

The case in which CPPD established discrimination concerns the complaint lodged by member of LGBTI community.

Majority of interviewees from vulnerable population groups who lodged complaints for protection against discrimination are not satisfied with actions taken by the Commission upon their complaint. Five interviewees reported they are completely dissatisfied with actions by the Commission upon their complaint, while two of them are partially dissatisfied.

Table no. 6: Satisfaction with actions taken by the Commission

Are you satisfied with actions taken by CPPD upon your complaint?	Total
Completely dissatisfied	5
Partially dissatisfied	2
Neither satisfied nor dissatisfied	1
Partially satisfied	0
Completely satisfied	1
TOTAL	9

*(*on the scale of 1 to 5 where 1 means completely dissatisfied and 5 means completely satisfied)*

On the contrary, only one person with disability indicated complete satisfaction with the manner in which the Commission acted upon his complaint, although in this case the Commission took decision not to initiate procedure. However, his satisfaction with actions taken by the Commission could be due to the fact that this interviewee is the single person whose discrimination problem was resolved.

Table no. 7: Resolution of discrimination issue

Was the discrimination issue resolved with the procedure led before CPPD?	Total
Yes	1
No	8
TOTAL	9

Other 8 interviewees who lodged complaints have not resolved the discrimination issue as a result of the procedure led before the Commission. The interviewee for whom the Commission adopted opinion with recommendation also indicated that, although he was awarded redress, he faces difficulties in resolution of the discrimination issue.

This analysis does not reflect only current state-of-affairs, but also views, opinions and proposals made by interviewed members of vulnerable population groups to address them. In that regard, members of vulnerable groups were allowed to provide own opinions/proposals aimed to improve actions taken by the Commission upon complaints lodged for protection against discrimination.¹³

Table no. 8: Proposals to improve CPPD's work

Proposals for improvement	Total
Shorter deadline for decision making	6
Appointment of members with long-standing experience	8
Employment of professional and competent expert services	4
Reducing political influences on CPPD's work	4

In that, interviewees from vulnerable groups who lodged complaints before the Commission also made several proposals aimed to improve CPPD's work, as follows: 1) shorter deadline for decision-making upon complaints – 6 interviewees; 2) appointment of commission members with long-standing experience and track record in the field of prevention and protection against discrimination

¹³ Interviewees were offered 4 answers and were allowed to select several options.

– 8 interviewees; 3) employment of professional and competent expert service – 4 interviewees; and 4) reducing political influences on CPPD’s work – 4 interviewees.

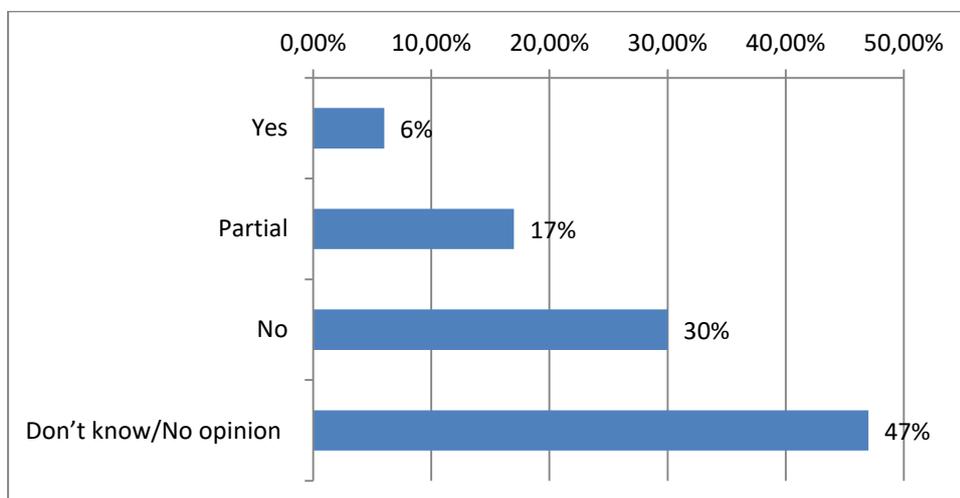
These data allow the conclusion that, according to opinions shared by Roma, sex workers, people using drugs, LGBTI people and persons with disabilities who lodged complaints before CPPD, all four solutions offered are relevant and needed, but the biggest importance was given to appointment of persons with long-standing experience and track record in the field of prevention and protection against discrimination as commission members. Vulnerable population groups that are directly exposed to discrimination and are facing numerous obstacles in protecting their rights have rightfully identified the key factor that could contribute to improved efficiency – relevant track record and professionalization of CPPD’s composition, which has been duly integrated as legal solution in the new LPPD.

In addition, 3 interviewees enlisted additional proposals to improve actions taken by CPPD upon complaints. They include: greater trust in statements made by victims; commitment on the part of commission members; focus on discrimination in the area of labour relations; and prevention of discrimination.

b) Views on CPPD’s transparency and accountability

Small share of 150 interviewees from vulnerable population groups (6% or n=9) have positive opinions and indicated CPPD is open and transparent in its work, while 17% indicated partial agreement with this statement. 30% of them believe that CPPD is not open and transparent in its work. On the other hand, 47% or almost half of them responded they do not know or they do not have opinion, which is complementary to data that half of interviewees from marginalized communities are not informed about the Commission’s role and competences (see Chart no. 38).

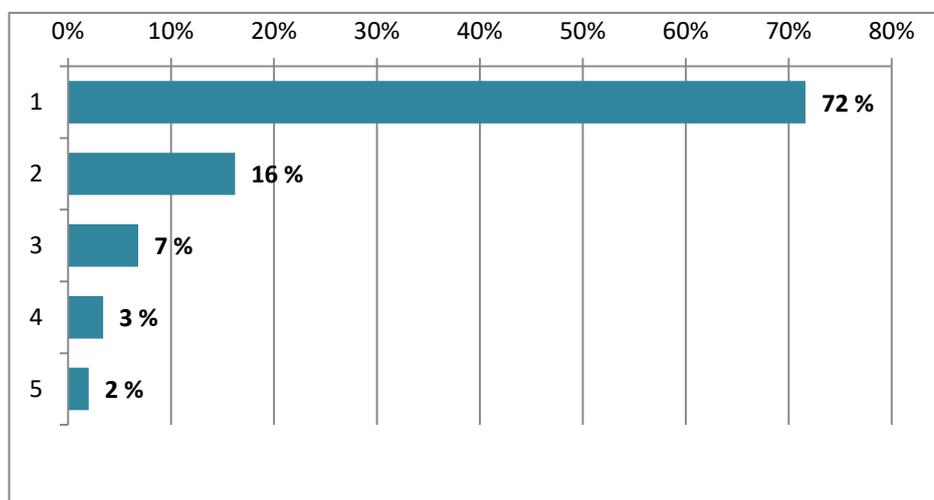
Chart no. 38: Views about the Commission’s transparency and accountability



Good examples about CPPD’s transparency indicated by 4 interviewees include: openness and availability of the Commission’s annual and financial reports; fast, public and transparent reaction by the Commission upon complaint lodged by Nikola Gruevski, which had not been the case with other complaints; complaints lodged by medical doctors; and complaint lodged against contents of pedagogy textbook. On the contrary, 13 interviewees enlisted examples of poor transparency on the part of the Commission, such as: the case of Nikola Gruevski; manner in which commission members were appointed; lack of knowledge about the Commission’s role and work, especially among people with lower education degrees; the fact that commission member discussed the case of certain interviewee on television; the fact that the public is not informed about the protection procedure; no examples can be indicated because commission members have not done anything; non-functional website; [the Commission] failed to acknowledge evident case of discrimination in textbook; [interviewees] have never heard about the Commission.

Above-indicated data show that the Commission has not developed a clear image about its role and competences among Roma, sex workers, people using drugs, LGBTI people and persons with disabilities, as one of key institutions they could address for protection against discrimination.

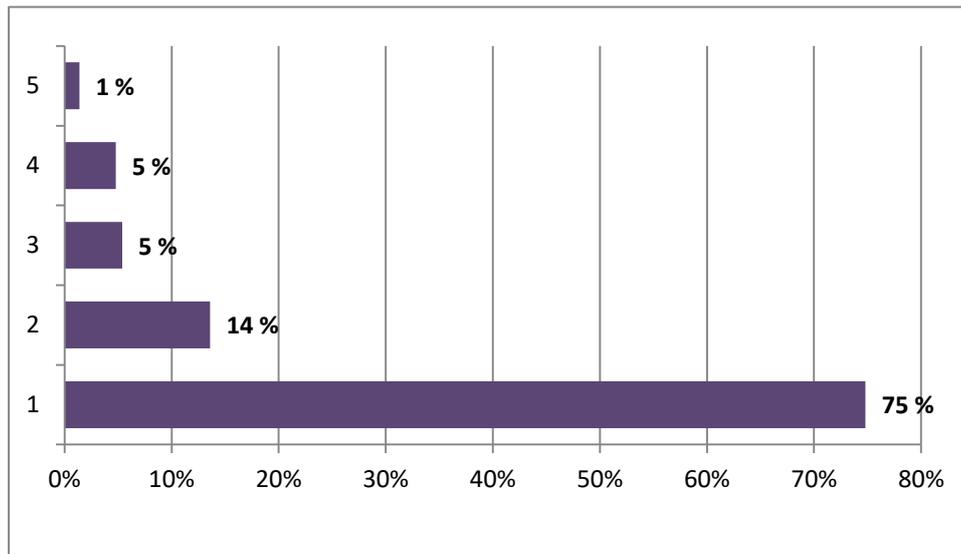
Chart no. 39: Satisfaction with the Commission’s representation in the media



(1=very dissatisfied, 2=partially dissatisfied, 3=neither satisfied nor dissatisfied, 4=partially satisfied, 5=very satisfied)

High share (72%) of interviewees from vulnerable population groups who are often victims of discrimination expressed great dissatisfaction with the manner in which the Commission is represented in the media, unlike 3 interviewees who indicated great satisfaction.

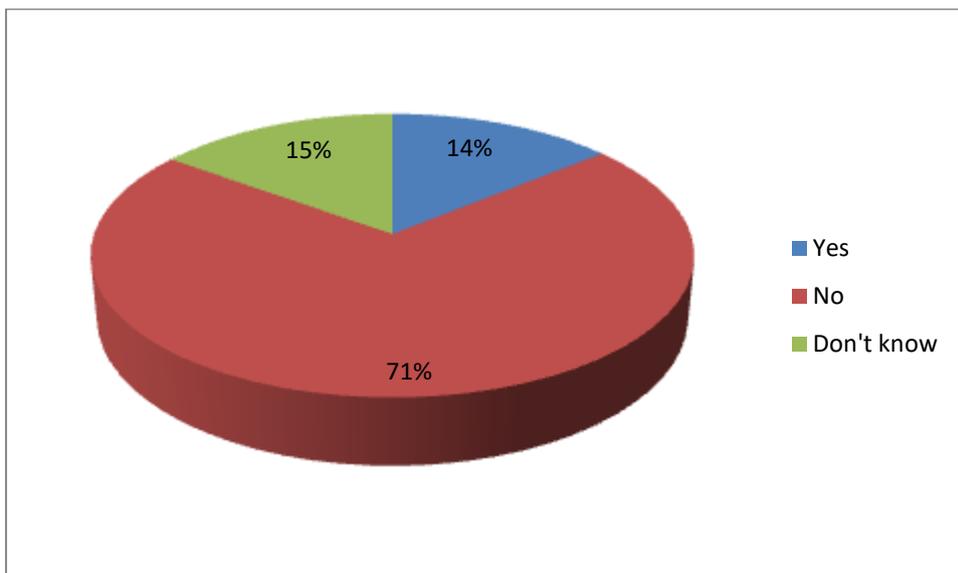
Chart no. 40: Satisfaction with the manner in which the Commission informs the public



(1=very dissatisfied, 2=partially dissatisfied, 3=neither satisfied nor dissatisfied, 4=partially satisfied, 5=very satisfied)

Also, high share (75%) of interviewees from marginalized communities indicated great dissatisfaction with the manner in which the Commission informs citizens and the public, while 14% of them indicated partial dissatisfaction. On the contrary, very low share of interviewees indicated great and partial satisfaction (6% in total).

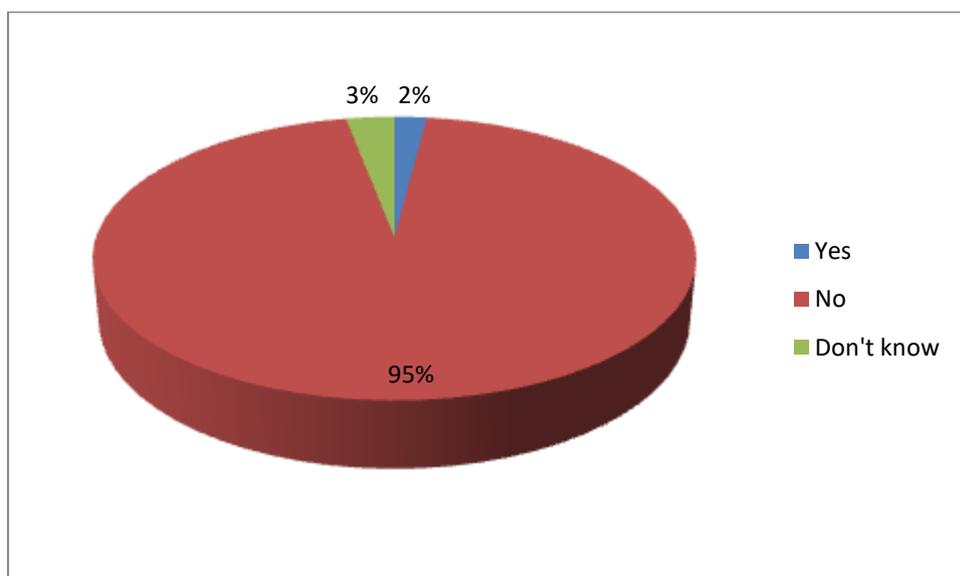
Chart no. 41: Knowledge about case in which CPPD informed the public



Only 14% of vulnerable population groups have knowledge about discrimination case or problem in which the Commission made public appeal for prevention or discontinuation of discrimination. High share of them have not heard (71%) or do not know (15%) of such case. 19 interviewees indicated cases in which CPPD made public appeal to prevent or discontinue discrimination, as follows: cases of discrimination against Roma people at the border-crossing point; restricted access of Roma to coffee shops and to swimming pools; discrimination on the basis of gender in vacancy announcements; restaurant practice to deny access for women wearing headscarves; person expelled from hospital in Tetovo; case of Nikola Gruevski, etc.

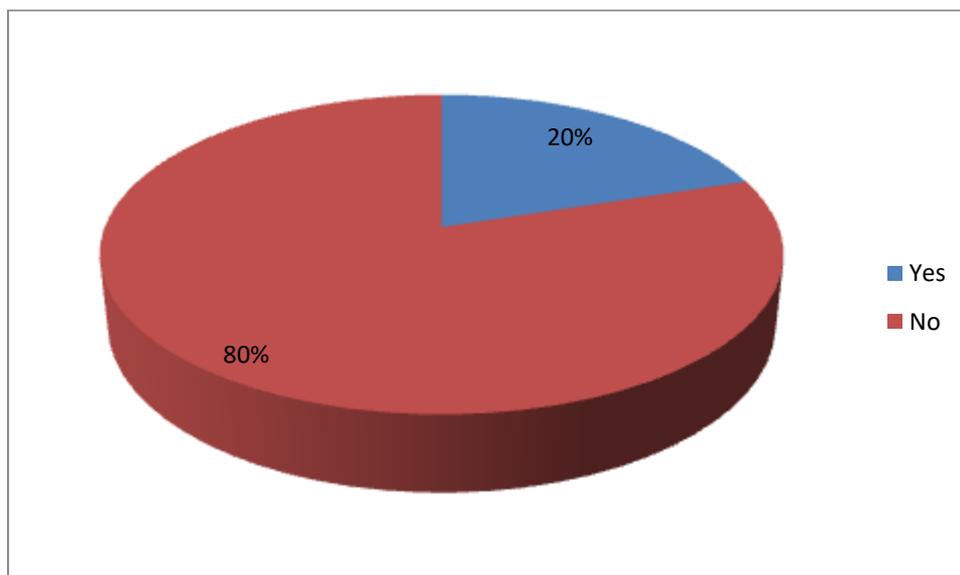
High 87% of interviewees from marginalized communities have not seen commission members to appear in the public (TV) or to inform the public about discrimination issues, while insignificant 8% of them provided affirmative answers. Among them, topics covered by CPPD members in their public appearances or in the media concerned: the new LPPD; information about and promotion of the Commission's work; LGBTI people; public events organized in cooperation with citizens' associations such as HERA, Coalition Margins and Polio Plus; disabilities; and information on specific cases, like the case of Nikola Gruevski. This confirms the conclusion that the media and media presence of commission members is one of the best ways to improve transparency and prevention and to strengthen awareness of the public and of vulnerable population groups about discrimination and protection mechanisms.

Chart no. 42: Participation in events organized by the Commission



Data on inclusion and involvement of vulnerable population groups in events organized by the Commission are astonishing. Only 3 representatives of Roma, sex workers, people using drugs, LGBTI people and persons with disabilities responded they had possibility to participate in such events. Remaining 95% of them did not have opportunities to attend events organized by the Commission, while 4 interviewees do not know. Events attended by 3 from 150 interviewees concerned topics related to disability and labour relations (n=2) and presentation of the Commission's annual report (n=1). These data underline the need for events organized by CPPD's new composition to actively involve vulnerable population groups, thereby allowing them to obtain information and knowledge about CPPD's role, its method, procedure and conditions for protection against discrimination, to build their trust in the institutional system for protection; and to encourage them to lodge complaints before CPPD and other competent institutions.

Chart no. 43: Knowledge about CPPD's website



Data that high share of interviewees from vulnerable groups (80%) are not familiar with the Commission's website does not contribute towards its transparency and openness. Only 20% of interviewees are familiar with the Commission's website. Almost half of those that indicated knowledge (47%) have not visited the Commission's website. Among those that visited this website, 4 interviewees found the information needed, while 12 interviewees did not find necessary information.

In order to improve transparency of CPPD's new composition, members of marginalized communities provided their specific views and proposals aimed to improve CPPD's website and new

composition. Hence, 13 interviewees believe that more information on the Commission’s work should be published on its website, 11 interviewees indicated the need for practical tools, examples from complaints lodged on different discrimination grounds, while 8 interviewees believe the website should facilitate interaction with commission members and its expert service. 4 interviewees provided additional proposals to improve CPPD’s website, as follows: publicity and transparency of the Commission’s actions in discrimination cases; accessibility; educational contents; resources on activities, campaigns, advertising material and detailed information on how to report discrimination. CPPD’s new composition is recommended to take these proposals into consideration.

Table no. 9: Proposals to improve CPPD’s transparency and accountability

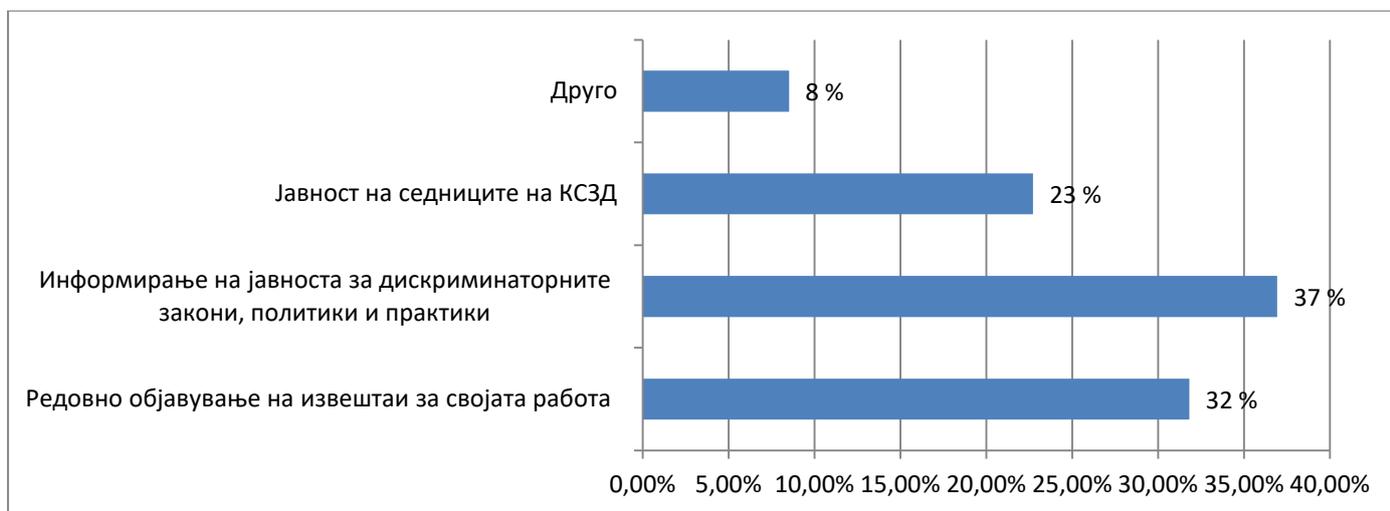
Proposals for improvement	Total
More information on CPPD’s work	13
Practical tools and examples of complaints	11
Interaction with CPPD members	4
Other proposals	4

No interviewees indicated knowledge about CPPD’s annual budget, although this question is of exceptional importance for the Commission’s transparency.

39% of interviewees from vulnerable population groups believe that CPPD’s sessions should be public, with respect for legal provisions on protection of personal data; 40% of them do not know, while 19.33% of interviewees did not answer this question. Only 2% believe that CPPD’s sessions should not be public. These data show that members of vulnerable population groups recognize, albeit to limited extent, advantages from openness and publicity of CPPD’s sessions.

Members of vulnerable population groups provided other specific proposals to improve transparency of CPPD’s new composition. Hence, 32% of interviewees believe that CPPD’s annual operation reports need to be regularly published; 37% indicated the need for public information on antidiscrimination laws, policies and practices; while 23% believe that transparency will be improved through publicity of CPPD’s sessions (see Chart no. 44).

Chart no. 44: Proposals to improve CPPD’s work



Превод за графиконот:

Other

Publicity of CPPD's sessions

Information dissemination on antidiscrimination laws, policies and practices

Regular publication of operation reports

Децималните записки во хоризонталната оска да се заменат во децимални точки (или да се преправи скалата без децимали, нема потреба од нив)

15 interviewees from marginalized communities provided additional comments and proposals aimed to improve transparency of CPPD's new composition, such as: placements of info desks in public spaces; information dissemination on the internet and social networks; greater visibility on social networks and social media campaigns. CPPD is recommended to demonstrate proactivity, to communicate with discriminated communities and to cooperate with the civil society in order to identify more cases and collect direct information from the terrain. Roma, sex workers, people using drugs, LGBTI people and persons with disabilities recommend CPPD's new composition to create e-mail lists of LGBTI, to prepare brief reports and letters, to disseminate feedback on resolution of cases and whether discriminators have acted upon recommendation to eliminate discrimination, to appear in television programmes, to promote their work on the internet and social networks, to engage in direct communication with citizens, to publish information about CPPD in more media outlets, special programs and debate shows on equality and non-discrimination, to participate in actions of civil society organizations, to promote its work on social media, through advertising, detailed and comprehensive reports on its actions, to organize more public debates, public appearances, etc.

9. SPECIFIC CHARACTERISTICS OF DIFFERENT VULNERABLE POPULATION GROUPS

The first part of this analysis presented summary data obtained from responses by all interviewed marginalized groups, while this part provides an overview of specific needs of individual vulnerable population groups.

Persons with disabilities

The analysis shows that persons with disabilities have insufficient knowledge and little personal experiences with CPPD. Most frequent discrimination grounds for this community include disability, health status, and national or ethnic background, while discrimination areas concern social protection and healthcare, labour relations, access to goods and services, but also education, science and sport.

Majority of persons with disabilities (70%) understand discrimination as unequal treatment, while 33% define it as restricted exercise of rights and 30% as prevented access to goods and services.

As regards equal treatment in the society, only 17% of persons with disabilities believe they enjoy equal treatment in the society, 30% of them believe they do not enjoy equal treatment, while 53% indicated partially equal treatment in the society. Accordingly, high 73% of persons with disabilities believe they are discriminated in our society, unlike 27% that indicated they are not discriminated.

Most frequently indicated discrimination ground is disability, as indicated by 57% of persons with disabilities, followed by health status (30%) and national or ethnic background (20%). Every third person with disability (33%) faced discrimination in the area of labour relations and social protection and healthcare, while 20% of them faced discrimination in access to goods and services. Most often, they have been discriminated by state bodies (47% or n=14), by local self-government units (27% or n=8), and by natural persons (27% or n=8).

As regards their knowledge about existence of separate law on prevention and protection against discrimination, 60% of them indicated knowledge thereof, but 40% are unaware of the law's existence. Accordingly, persons with disabilities need more and better information about CPPD's role and competences compared to other mechanisms for protection against discrimination (Ombudsman and the courts) for which they indicated knowledge. Only 37% of persons with

disabilities have knowledge about CPPD, unlike 60% that indicated knowledge about the courts or 57% that indicated knowledge about the Ombudsman. Some interviewees stressed they are unaware of this institution and its primary function. This observation is supported by the fact that only 1 interviewee from this vulnerable group lodged a complaint before CPPD, but CPPD did not initiate procedure.

Perceptions on the Commission's transparency and accountability are unsatisfactory, having in mind that only 10% of interviewees from this community believe that the Commission is transparent and accountable in its work, 47% believe that the Commission is partially accountable, while 43% believe that the Commission is not transparent and accountable. More than half of persons with disabilities (53%) have knowledge about the Commission's website. However, high 83% of those that visited this website did not find needed information. Opinions about the need for the public to be allowed to attend the Commission's sessions are diverse, whereby only 23% of persons with disabilities believe that the public should attend these sessions, while high share of them (73%) indicated they do not know whether the public should be allowed to attend the Commissions' sessions on reconsideration and decision-making upon complaints.

Persons with disabilities stressed the need for more information and greater presence of CPPD in the media, news programmes and newspapers, because all persons with disabilities do not have access to the internet and do not know how to use this tool.

Efforts are needed to build capacity of persons with disabilities and their representative organizations for advocacy and involvement in development of policies that affect them, especially discrimination on the basis of disability.

Relevant legislation need to be aligned with the Convention on the Rights of Persons with Disabilities, which was ratified by our country and according to which the concept of inclusive equality and non-discriminations is defined as both principle and right.

On daily basis, persons with disabilities are facing inaccessible infrastructure and buildings, but also barriers in exercise of their rights and obtaining certain services by the institutions. CPPD's premises are inaccessible for persons with disabilities. In our country, information is not provided in formats adequate for persons with disabilities. Official websites of institutions, the media, but also of CPPD, are not accessible for persons with sensory or intellectual disabilities.

The state is obliged to ensure physical accessibility and access to information for persons with disabilities (Article 9 of CRPD). Sign language, Braille's alphabet and easily understandable formats are limited and insufficiently promoted. CPPD must be accessible for persons with disabilities.

Roma

The Roma community rarely recognizes and reports discrimination. According to their statements, Roma are most frequently discriminated on the basis of national or ethnic background and on the basis of belonging to marginalized group, while discrimination areas they reported include: social protection and healthcare; education, science and sport; and access to goods and services.

Majority of Roma people (73%) perceive discrimination as unequal treatment, while 37% define it as restricted exercise of rights and prevented access to goods and services (23%).

40% of Roma believe they enjoy equal treatment in the society, unlike 37% of them who believe they do not enjoy equal treatment, i.e. they partially enjoy equal treatment in the society (23%). Accordingly, more than half of interviewees (53%) believe they are not victims of discrimination, unlike 47% who believe they have been discriminated.

Most frequently indicated discrimination ground is national or ethnic background (40%), followed by skin colour (20%), and belonging to marginalized group (17%). Roma most often indicated discrimination in the area of social protection and healthcare (27%), access to goods and services (13%), and education, science and sport (13%). Most often they have been discriminated by natural persons (27%), legal entities with public authorizations (17%) and by state bodies (13%).

60% of Roma do not have knowledge about existence of separate law, while 40% of them indicated knowledge about the new Law on Prevention and Protection against Discrimination. Roma interviewees indicated knowledge about CPPD's role and competences (43%), compared to other mechanisms for protection against discrimination (Ombudsman and the courts), for which they indicated lack of knowledge. Also, almost half (47%) of Roma indicated they could address civil society organizations for protection against discrimination. However, 1 of 30 interviewees from the Roma community lodged complaint before CPPD, but has not received any response thus far. Roma community's vulnerable and marginalized status is indicative of the need for greater field work focused on raising awareness about discrimination and possibilities for protection against discrimination.

As regards perceptions of Roma interviewees about the Commission's transparency and accountability, only 17% of them believe the Commission is transparent and accountable for its work, while 2 interviewees indicated partial transparency. On the contrary, high 67% of Roma do not have opinion on this question, while 10% believe the Commission is not transparent and accountable in its work. It should be noted that Roma do not have knowledge about the Commission's official website. Asked about the need for the public to attend the Commission's sessions, high 63% of Roma interviewees believe these sessions should be public, while 37% of them do not have opinion on this question.

High share of Roma (77%) believe the Commission should provide more information to the public about antidiscrimination laws, policies and practices, while almost half of them believe the Commission should regularly publish its operation reports.

People using drugs

This part of the analysis presents knowledge, experiences and needs of people using drugs based on their responses to questions from this analysis. Almost all interviewees (96.6%) responded that discrimination amounts to unequal treatment, while some interviewees believe that discrimination also represents restricted exercise of rights (46.6%) and prevented access to goods and services (43.3%).

Majority of people using drugs (90%) believe they do not enjoy equal treatment, while only 2 interviewees indicated partial enjoyment of equal treatment. Only 1 interviewee from persons using drugs believes they are treated equally. These data correspond to high share of personal experiences with discrimination, whereby 93.3% of interviewees responded they have been discriminated.

Serious concerns are raised by the fact that 70% of interviewees are not aware about existence of separate law on prevention and protection against discrimination; half of them (53.3%) are not familiar with CPPD's role and competences, while 30% have partial knowledge about CPPD's work.

As indicated above, drug use is strong source of stigmatization and discrimination and therefore people using drugs or undergoing treatment for opiate addiction, i.e. substitutional therapy, are suffering health problems that require treatment and support. Therefore, 50% of interviewees indicated that, among others, they had experiences with discrimination on the basis of health status. Compared to share of answers indicating health status as discrimination ground in the total number of interviewees that stands at 16.6%, the relevant share of such answers among people using drugs

shows they are disproportionately more frequently discriminated on this ground compared to other marginalized communities. Similar to answers among the total number of interviewees, belonging to marginalized group is the most frequently indicated discrimination ground indicated by people using drugs. Hence, 93.3% of them faced discrimination on this ground, which is indicative of the fact that their health status is not necessarily the reason for their discrimination, but rather their position in the society, non-acceptance by the society, their treatment as criminals by the police, perceptions that drug use is criminal offence, etc. Only 2 interviewees indicated personal experiences with discrimination on the basis of sex, while 1 interviewee indicated discrimination on the basis of gender. Data they provided do not make it clear whether these cases included multiple discrimination grounds (for example, belonging to marginalized group, health status, etc.) having in mind that interviewees were allowed to provide multiple answers to this question.

The area in which people using drugs were most frequently discriminated is social protection and healthcare (70%). Interviewees also indicated they faced discrimination in the area of labour relations, but also in the area of judiciary and administration, as indicated by 20% each. Other interviewees who use drugs indicated they faced discrimination in access to goods and services (n=2); education, science and sport (n=3), and 1 interviewee indicated discrimination in relation to the right for political party membership. The last information corresponds to data that one person had been discriminated on the basis of political convictions.

More sources indicate that people using drugs are victims of systemic discrimination, which is confirmed by data from this analysis and represents the biggest obstacle to reporting discrimination cases due to fear of victimization and worse treatment after such reports. In particular, 83.3% of interviewees indicated personal experiences with discrimination by state bodies, 1 interviewee by local self-government unit, while 2 interviewees indicated personal experiences with discrimination by natural persons.

Contrary to the high share of answers on personal experiences with discrimination, people using drugs do not have sufficient knowledge about available mechanisms for protection against discrimination. Almost all interviewees (93.3%) responded that in case of discrimination citizens could seek protection from civil society organizations, while some of them additionally indicated that protection could be sought from the Ombudsman (40%), CPPD (13.3%), and the courts (6.6%).

As regards personal experience of people using drugs with procedures for protection against discrimination, only 2 interviewees lodged complaints. Discrimination was not established in both of these cases. Interviewees who lodged complaints are not satisfied with such outcome, because one

case included decision that established there is no discrimination, while relevant procedure was not initiated in the second case, which prevented them to receive protection and to resolve problems they have faced.

As a result of this situation, people using drugs believe that improved protection against discrimination necessitates shorter deadlines for decision-making and appointment of members to CPPD who hold long-standing experience in this area. The latter is of particular importance in the period when this analysis is finalized, because it overlaps with validity of the open call for appointment of members to CPPD when all potential members that fulfil relevant terms and conditions from LPPD (at least 7 years of experience in the field of human rights, of which 5 years in the field of non-discrimination) should be mobilized and motivated to apply.

Knowledge about legal and institutional possibilities for protection against discrimination and motivation of people using drugs to report discrimination cases is of key importance in order to improve state-of-affairs related to discrimination against marginalized communities. Adherent performance of legal competences and proactivity of mechanisms for protection against discrimination, in particular CPPD, are important in order to inform citizens to abstain from discriminatory behaviour, to recognize discrimination and to act in cases of discrimination.

Data related to CPPD's transparency and accountability show that 66.6% of interviewees believe that CPPD is not transparent and accountable, while 33.3% of them do not have opinion on this question. These responses do not surprise given that high 93.3% of interviewees indicated lack of knowledge about CPPD's website and no interviewees from this vulnerable group have visited this website. Although people using drugs have not visited CPPD's website, they proposed measures aimed to improve its performance, i.e. *"to introduce practical tools, examples of complaints lodged on different discrimination grounds"* and *"to provide possibility for interaction with members of CPPD"*.

Interviewees do not have opinion whether CPPD's sessions should be public, whereby only two of them indicated that these sessions should be public, while the others responded they do not know. However, interviewees made proposals aimed to improve CPPD's transparency and accountability through *"regular publication of its operation reports"*; *"information for the public about antidiscrimination laws, policies and practices"* and *"publicity of CPPD's sessions"*.

Sex workers

Sex workers and their knowledge, perceptions and experiences with discrimination were also subject of this analysis. Unlike summary results presented above, this part of the document is focused on analysis of responses provided by interviewees who identify themselves as sex workers.

Similarly to results obtained from other communities, almost all sex workers define discrimination as unequal treatment (93.3%), restricted exercise of rights (26.6%) and prevented access to goods and services (16.6%).

Compared to survey results among people using drugs, smaller share of interviewed sex workers believe they do not enjoy equal treatment (83%), while 10% believe they partially enjoy equal treatment with other citizens. Only 2 interviewees believe they enjoy equal treatment in the society. These data correspond to high share of interviewees (80%) who have been discriminated or have personal experiences with discrimination.

Only 16.6% of interviewed sex workers indicated knowledge about existence of separate law on prevention and protection against discrimination, while 1 interviewee indicated knowledge about CPPD's competences.

As regards personal experiences with discrimination, 80% of sex workers who indicated they have been discriminated also reported that discrimination was based on belonging to marginalized group. Individuals who enjoy protection against discrimination on this ground are those marked by higher likelihood to be discriminated on different grounds.¹⁴ Sex workers are often victims of intersectional discrimination¹⁵ due to their gender, social status, and profession, while additional reasons for their discrimination include ethnic background and/or sexual orientation and gender identity. This is confirmed by results of this analysis, whereby sexual orientation is the second most frequently indicated discrimination ground among this community, which was indicated by 16.6% of interviewed sex workers, followed by gender identity - indicated by 13.3% of interviewed sex workers. One interviewee indicated he was discriminated on the basis of family and marital status.

As regards areas in which sex workers most frequently faced discrimination, majority of interviewees indicated judiciary and administration (43.3%) compared to the area of social protection that dominated the answers of all interviewed communities and the answers of people using drugs. Under the 2018 survey research on legal needs and access to justice for sex workers, 58% of them

¹⁴ Najchevska, M. and Kadriu, B. Glossary of terms related to discrimination. OSCE and MCIC, Skopje 2008, pg.61

¹⁵ Dimitrievski, V., Tosheva, M., Boshkova, N. Analysis of Needs for Change of Legislation on Sex Work in the Republic of Macedonia: Needs and Challenges, HOPS – Healthy Options Project Skopje, 2016.

indicated they have faced a legal problem in the last 3 years.¹⁶ Data clearly show that sex workers have limited access to justice when exercising their rights before institutions competent to protect citizens' rights. Hence, 20% of interviewed sex workers indicated personal experiences with discrimination in access to goods and services; social protection and healthcare (n=3); labour relations (n=3), and 1 interviewee indicated discrimination in the area of public information and the media. In 2017, the Coalition Margins conducted a survey research among sex workers in order to collect detailed information about their problems and priorities and the results showed that this community assigned the lowest score to the social protection system, i.e. a cumulative score of 2.12 (on the scale from 1 to 5, where 1 means the most negative assessment and 5 means the most positive assessment).¹⁷

Similar to people using drugs, sex workers are also victims of systemic discrimination, which was confirmed by interviewees' answers. High 73.3% of sex workers indicated they have been discriminated by state bodies, while 40% indicated they were victims of discrimination by natural persons.

Data show that sex workers recognize discrimination, whereby 80% of interviewees stated they were victims of discrimination. However, they lack knowledge about possibilities to report discrimination cases before competent institutions. High share of interviewed sex workers (86.6%) indicated that citizens could address civil society organizations for protection against discrimination. Interpretation of these data should take into account the fact that civil society organizations often mediate or refer members of marginalized communities to competent institutions where they could seek protection, such as the Ombudsman, courts, CPPD, police and other institutions. Four interviewees responded that the Ombudsman is competent for protection against discrimination, while 3 interviewees indicated CPPD. Majority of interviewed sex workers stated they were victims of discrimination by state bodies and having in mind that the Ombudsman has limited competences to act in cases of violations made by state bodies, it could be concluded that this is one of the reasons why sex workers more frequently indicted the Ombudsman as mechanism for protection against discrimination. Only 1 interviewed sex worker responded that courts are the competent mechanism for protection against discrimination.

According to data, some interviewed sex workers have knowledge about available mechanisms for protection against discrimination, while those who addressed civil society organizations most

¹⁶ Cekovski, I. and Dimitrievski, V. Legal Needs and Access to Justice for People Using Drugs and Sex Workers in the Republic of Macedonia, 2018, pg. 40.

¹⁷ Coalition Sexual and Health Rights of Marginalized Communities, MARGINS Skopje, 2017 Annual Report, Skopje 2018, pg. 80.

probably obtained information about their right to initiate procedure for protection against discrimination. However, no sex workers lodged complaints for protection against discrimination in spite of the fact that 80% of them were victims of discrimination.

Data obtained from this analysis correspond with results from the 2018 survey research on legal needs and access to justice for sex workers. One-third of sex workers do not take any action to have their legal problems resolved. Significantly lower proactivity in resolution of legal problems is noted among sex workers, Roma, people with lower education background and male sex workers. Similar to intravenous drug users, inactivity is mainly due to lost hope that anybody could help them resolve problems, distrust in the judiciary and poor economic power.¹⁸

Data about CPPD's transparency and accountability shows that no interviewees from this community believe that CPPD is transparent and accountable, while only 6.6% of them believe the Commission is partially transparent and accountable. Similar to people using drugs, these answers do not surprise having in mind that 90% of interviewees lack knowledge about CPPD's website and only 1 interviewee visited CPPD's website and obtained necessary information. Small share of interviewed sex workers shared their opinion that specific measures need to be taken to improve functionality of CPPD's website, i.e. *"there should be more information on CPPD's work"* and *"there should be practical tools and examples from complaints lodged on different discrimination grounds"*.

Same with the situation observed among people using drugs, interviewed sex workers do not know whether CPPD's sessions should be public: 2 interviewees responded these sessions should be public, while the remaining interviewees do not know. Nevertheless, interviewees provided proposals aimed to improve CPPD's transparency and accountability, notably by means of *"regular publication of its operation reports"* (n=1); *"information for the public about antidiscrimination laws, policies and practices"* (n=2) and *"publicity of CPPD's sessions"* (n=2).

LGBTI community

Lesbians, gay, bisexuals and trans-people showed knowledge about elements of discrimination whereby 90% of them responded that discrimination amounts to unequal treatment and restricted exercise of rights, while 73% added that discrimination also includes prevented access to goods and services. Similar to the situation observed with other communities, 76.6% of interviewed LGBTI

¹⁸ Cekovski, I., Dimitrievski, V. Legal Needs and Access to Justice for People Using Drugs and Sex Workers in the Republic of Macedonia, 2018, pg. 14.

people believe they do not enjoy equal treatment, while 16.6% indicated partially equal treatment. These data correspond to personal experiences related to discrimination among LGBTI people. In particular, 96.6% of interviewees responded they have been discriminated, while 76.6% of them indicated they have been discriminated on the basis of their sexual orientation. According to the World Bank's 2018 regional research which also included the Republic of Macedonia, 94% of LGBTI people indicated there is discrimination in our state.

Compared to other communities that are subject of this analysis, LGBTI people demonstrate better information about existence of separate law on prevention and protection against discrimination, whereby 70% of interviewees indicated knowledge about LPPD, 46.6% of them are familiar with CPPD's competences, while 30% have partial knowledge about CPPD's work. Interpretation of these data should take into account the fact that development and adoption of both LPPD (in 2010 and 2019) was accompanied by homophobic and transphobic statements by Members of Parliaments that raised discussions and reactions in the public, which must have contributed to higher level of knowledge among LGBTI people that are most affected by this law.

Survey data show that LGBTI people are subject of multiple discrimination on various discrimination grounds unlike other communities that are subject of this analysis. In addition to sexual orientation, 33.3% of interviewees responded they have been discriminated on the basis of gender, 30% on the basis of gender identity and 30% on the basis of political convictions. All interviewees discriminated on the basis of gender are women and almost all of them are female, with the exception of one male interviewee. This information shows that lesbians and bisexual women are more frequently discriminated on the basis of gender compared to sexual orientation as discrimination ground. Smaller number of interviewees reported they have been discriminated on the basis of national or ethnic background and age (n=4), family or marital status (n=3); property and social status (n=2), and belonging to marginalized group, health status, gender, education and religion (n=1).

Compared to data from the World Bank's 2018 regional research, similarities are observed in terms discrimination grounds indicated by LGBTI people, whereby the most frequently indicated discrimination grounds include: sexual orientation, gender identity, ethnic background, gender, etc.¹⁹

LGBTI people most often face discrimination at their jobs, whereby 66.6% of them stated they have been discriminated at their job, followed by 40% that indicated discrimination in the judiciary and

¹⁹ World Bank. Life on the Margins: Survey Results of the Experiences of LGBTI People in Southeastern Europe, 2018, стр. 36

administration, and access to goods and services. Significant 43.3% of interviewees responded they have been discriminated in the area of education, science and sport. There are several research studies confirming that LGBTI youth are facing harassment and bullying in the course of their education.²⁰

Findings from the Health Behaviour in School Aged Children's 2018 Macedonia Study (age 11, 13 and 15) showed that LGBTI youth are up to four times more frequently bullied by their peers, with boys more affected than girls. This trend is increasing instead of decreasing, with tendency of habituation and normalization of such behaviour as justified. 26.6% of interviewed LGBTI people responded they have been discriminated in the areas of social protection, public information and the media. On several occasions, CPPD reconsidered discrimination of LGBTI people in the media upon complaints lodged against media outlets that broadcasted discriminatory and harassing contents on the basis of sexual orientation and gender identity.²¹

Majority of LGBTI interviewees (76.6%) reported they were victims of discrimination by natural personal, 60% by state bodies, and 1 interviewee was victim of discrimination by local self-government unit.

Data show that LGBTI people recognize discrimination and are well informed about available mechanisms for protection against discrimination. However, majority of them (90%) indicated civil society organizations as the place where they could seek protection; 73.3% indicated CPPD and the Ombudsman; while 60% indicated the court as mechanism for protection against discrimination. Although LGBTI people demonstrate higher level of knowledge about available mechanisms for protection against discrimination, significantly smaller share of them (16.6%) responded they have lodged complaints for protection against discrimination. Among them, CPPD established discrimination in one case, did not establish discrimination in two cases, and 2 interviewees who have lodged complaints are still waiting for response.

As regards their satisfaction with the procedure's outcome, 1 interviewee indicated a score of 3 and 2 interviewees indicated a score of 1 on the scale from 1 to 5. Although 1 interviewee indicated that CPPD had taken positive decision that established discrimination, the legal problem of this person was not resolved. On the question whether the procedure led before CPPD resulted in resolution of

²⁰ Boshkova, N. Analysis of Mechanisms for Protection against Discrimination of Marginalized Communities at Local Level: Municipality of Bitola, Municipality of Strumica and Municipality of Centar, 2013. Kjostarova Unkovska, L. How equal and secure are youth in Macedonia in their sexual development and experiences? Data from HBSCM research among youth at the age of 15 years, 2016.

²¹ Commission for Prevention and Protection against Discrimination. Opinion no. 07-542 from 27.11.2014.

their discrimination problem, no interviewees provided affirmative responses, which leads to the conclusion that CPPD's decision is not efficient in ensuring protection against discrimination.

Interviewed LGBTI people believe that additional measures need to be taken to improve CPPD's work. In particular, they proposed shorter deadline for decision-making, which is already integrated in the new LPPD. Furthermore, 13.3% of interviewees proposed appointment of members with long-standing experience and employment of professional and competent expert service, while 10% believe that reduced political influences will improve CPPD's work. In addition, LGBTI interviewees believe that members appointed to CPPD should be dedicated and focused on discrimination in the area of labour relations and should give trust to victims seeking protection against discrimination. Representative of civil society organizations and LGBTI people should be part of CPPD.

Similar to other communities, 1 LGBTI interviewee believes that CPPD is transparent and accountable, while 30% do not have opinion about transparency and accountability of this institution. These data are logical having in mind that only 30% of interviewees are informed about CPPD's website. Only 3 interviewees visited this website, and one of them did not find information needed. As regards improved functionality of CPPD's website, LGBTI interviewees proposed: more information on CPPD's work (n=2); to introduce practical tools, examples of complaints lodged on different discrimination ground (n=3); and to provide possibility for interaction with CPPD members (n=1).

Data show that LGBTI interviewees believe CPPD is not transparent and accountable, and therefore 93.3% of them indicated CPPD's sessions should be public. Unlike other groups of interviewees, LGBTI people added other possible responses on this question and proposed: regular publication of CPPD's operation reports (80%); information to the public about antidiscrimination laws, policies and practices (90%); and publicity of CPPD's sessions (76.6%), and added a long list of proposal to improve CPPD's work.

Increasing the number of complaints lodged by marginalized communities before CPPD is one of the ways in which its work could be improved. In that, commission members would become more sensitive to everyday problems of LGBTI and would take measures to prevent discriminatory behaviour on the part of institutions and individuals.

LGBTI interviewees proposed better promotion of CPPD's work in mainstream media and social networks, as well as dissemination of information in the media on resolved discrimination cases and cases in which discrimination was established.

As regards better prevention and protection against discrimination, LGBTI interviewees believe that institutions need to show greater sensitivity to work with LGBTI people and CPPD members should be encouraged to act upon complaints related to violation of LGBTI rights. Also, efforts are needed to build mutual trust between LGBTI community and CPPD members through joint activities, participation of CPPD members in events organized by LGBTI community and other forms of cooperation. Increased participation of LGBTI people in the institutions will improve acceptance and will create an enabling environment for acknowledgement of the community's identity.

Improved legal framework for attainment of equality in the area of family and inheritance rights (marriage, civil partnership) and amendments to laws that discriminate LGBTI people will contribute to prevention and protection against discrimination. In addition to the protection granted under the law, interviewees proposed specific measures targeting employment, qualifications, re-training, housing for LGBTI people and other measures.

In the area of education, they proposed promotion of equality through education, inclusion of LGBTI topics in formal education and introduction of comprehensive sex education.

Trans-people proposed CPPD members to be more sensitive to specific problems and needs of the trans-community, to speak openly about discrimination against trans-people and to raise awareness about prohibition of discrimination and violence. Also, they stressed the importance for discriminators to be sanctioned in order to prevent future cases of discrimination. In that regard, LGBTI interviewees indicated the need for regular publication of statistical data on the number of sanctioned discriminators that would send the message that discrimination is *de facto* sanctioned.

Interviewees proposed better cooperation with other mechanism for protection against discrimination, for example, the Ombudsman. Also, they believe that CPPD, inter alia, should engage in promotion of its work at local level and inform people across the country about LPPD and mechanisms for protection against discrimination. Some interviewees proposed the local self-government units to appoint at least one person tasked to address discrimination issues.