



A CASE STUDY OF INACTION

Implementing UN CRC General Comment 21
on the Rights of Children in Street Situations
in Serbia



This project is funded
by European Union.



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Executive Summary

The United Nations Committee on the Rights of the Child issued General Comment 21 on the Rights of Children in Street Situations in June 2017. The Comment provides clear and authoritative guidance to States on how to develop comprehensive, long-term national strategies for protecting the rights of children in a street situation in accordance with the Convention on the Rights of the Child.

General Comment 21 is the first time the Committee on the Rights of the Child has provided guidance to States on protecting the rights of children in street situations. As such, it is an important milestone for efforts to protect and include children in street situations around the world.

The purpose of this report is to assess Serbia's progress towards implementing the guidance provided in General Comment 21 since its publication in 2017.

Who are children in street situations?

The term “children in street situations” is defined in General Comment 21 as (a) “children who depend on the streets to live and/or work, whether alone, with peers or with family; and (b) a wider population of children who have formed strong connections with public spaces and for whom the street plays a vital role in their everyday lives and identity”.

Progress towards implementing General Comment 21

Four and a half years after the General Comment 21 was published, in 2017, and despite the evident need to do so, Serbia has not begun to develop or implement a strategy on children in street situations. The competent state authorities should do so immediately.

Consultations with duty bearing institutions in Serbia as part of the preparation of this report indicate that almost no action has been taken directly in response to the guidance provided in General Comment 21 since its publication. Some action has been taken that is in line with the guidance provided in General Comment 21, but not directly in response to it. Duty bearing institution also referred to various actions related to the protection and social inclusion of children in general.

According to the duty-bearing institutions that contributed to this report, the only action taken in response to General Comment 21 since its publication has been to:

- Translate the document into Serbian (language), which was done in 2017;
- Present General Comment 21 at a meeting of the Council for Child Rights of the Government of Serbia, held in 2017;

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- Discuss General Comment 21 at a session of the [Serbian] Government Council for Monitoring the Implementation of the Recommendations of the UN Human Rights Mechanisms, also in 2017; and
- Include three recommendations responding to General Comment 21 in the implementation plan of the [Serbian] Government Council for Monitoring the Implementation of the Recommendations of the UN Human Rights Mechanisms.

Additionally, the City Centre for Social Works of the City of Belgrade and the drop-in shelter for children and youth in street situations of the City of Novi Sad stated that staff are familiar with General Comment 21; however they reported that no training on the application of the guidance provided in General Comment 21 has been provided to their professional workers.

In 2019 a drop-in shelter for children and youth in street situations was opened by the City of Belgrade¹; however duty-bearing public institutions did not mention this developed during consultations as part of the preparation of this report and it is unclear if the drop-in shelter was opened in response to General Comment 21. The drop-in shelter itself did not respond to a request to contribute to this report.

Data about children in street situations (or lack of it)

In Serbia, children in street situations are not officially recognised as a specific category of vulnerable children. As such, there are no official data about children in street situations. At no point has Serbia tried to systematically document or count the number of children in street situations in the country.

Due to the lack of official data collection, the number of children in street situations in Serbia is unknown. However, some data are available about the situations in Belgrade and Novi Sad, where the only specialised services in the country for children in street situations are located, which indicate that there are more than one thousand children in street situations in these two cities alone. How representative these situations are of the rest of the country is unclear.

Input from CSOs that work with children in Serbia indicates that the situation varies quite significantly across the country. Estimates by CSOs of the overall number of children in street situations in the country range from 2,000 (most commonly estimated) to 10,000. The available evidence does not clearly support or contradict the veracity of these estimates.

While the number of children in street situations is unclear, there is some evidence that it has substantially increased during the COVID-19 pandemic.

¹Note: The drop-in shelter operated by the City of Belgrade is a separate and unconnected service from the drop-in shelters operated by the Centre for Youth Integration in Belgrade.

Perceptions of children in street situations in Serbia

Children in street situations are widely viewed in Serbia –among both the general public and professionals that come into contact with children in street situations– to be victims of exploitation by their parents or other members of the Roma community, which shapes the response of duty bearing public institutions / practitioners.

Reality is more complex. While there is evidence that some children in street situations in Serbia are being exploited, including by their parents, experience shows that most children in street situations spend time on the streets –working alongside and/or in the care of their parents, siblings and/or peers– in circumstances that neither the child nor parent(s) perceive to be exploitative. Instead, in the face of extreme poverty and a lack of available alternatives, children (and parents) primarily perceive working on the street, including begging, as a means of survival. A special report on the rights of the child by the Protector of Citizens of RS, published in 2018, highlighted this point.

Approaches to children in street situations in Serbia: Policy

There is no legal or official definition of children in street situations in any Serbian law, regulation, strategy or action plan. General Comment 21 provides a clear definition of children in street situations, which Serbia should adopt.

While an increasingly comprehensive and progressive legislative framework seeks to protect children in Serbia, the law continues to discriminate against children in street situations and puts them at risk of violations of the Rights of the Child not faced by other children.

Most egregious is order 560-00-334/2018-01 on preventing the abuse of “street children”, which was originally issued by the Ministry of Labour, Employment, Veterans and Social Affairs in 2014, and re-issued in 2018 after the publication of General Comment 21. Order 560-00-334/2018-01 explicitly instructs centres for social work to coordinate with the police service to take a series of repressive measures against children in street situations, including separating children from their parents, which directly and seriously violate a child’s rights. The order should be rescinded immediately and protocols put in place to protect rather than repress children in street situations.

Children in street situations are not specifically referred to in any Serbian legislation. However, articles in three laws –the Law on Public Order and Peace, Criminal Code and Family Law– apply solely, in practice, to children in street situations, all with potentially negative outcomes for children.

Article 12 of the Law on Public Order and Peace directly and purposefully criminalizes children in a street situation and no other children for begging in public places. The Law violates the right of children in street situations to non-discrimination, includes provisions that are open to arbitrary application, and prevents children from undertaking activities necessary for their survival. Article 12 should be repealed immediately.

Article 193 of the Criminal Code and Article 81 of the Family Law include loosely defined provisions on the protection of children from violence, abuse and exploitation involved in begging that are open to misuse to repress children in street situations, including separating children from their parents. These provisions are operationalized by Order 560-00-334/2018-01 in a manner that clearly contravenes the rights of the child and demonstrates exactly how these laws are open to abuse. It is essential that both the Criminal Code and Family Law are strengthened in order to properly protect rather than repress children in street situations.

Several strategies and plans refer to children in street situations explicitly or to situations –mainly related to begging– that are solely relevant to children in street situations (children that are being in public spaces are children in street situations).

As noted above, the implementation plan of the Serbian Government Council for Monitoring the Implementation of the Recommendations of the UN Human Rights Mechanisms includes three recommendations responding to General Comment 21, which call for research into the number of children in street situations and its causes, implementation of the Special Report on Child Begging in RS, and the provision of support for children in street situations with full respect for the best interests of the child and their views. The Strategy of Social Inclusion of Roma for the Period from 2016 to 2025 calls for local protocols for the protection of Roma children who live and/or work in the streets and sustainable financial support for city services in the community, such as shelters, and increased use of the resources of social security institutions. These are well conceived and welcome proposals that should be implemented as part of a wider strategy on children in street situations in Serbia.

The Strategy for the Protection of Children from Violence and recently adopted General Protocol for the Protection of Children from Violence refer to child begging. The Strategy and General Protocols set important standards for protecting children from violence and should be operationalized, more explicitly recognising children in street situations, in order to effectively offer protection to these children.

Approaches to children in street situations in Serbia: Practice

Despite a raft of policies that increasingly promote child rights and measures to safeguard them, and notwithstanding repressive policies directly targeting children in street situations, most notably order 560-00-334/2018-01 on preventing the abuse of “street children”, experience shows that the main approach of duty bearing public institutions in Serbia towards children in street situations is inaction.

There are a severe lack of state funded services for children in street situations. Drop-in shelters in the cities of Belgrade and Novi Sad are the only know specialised services for children in street situations in the country.

When action is taken by other “competent” duty-bearing institutions, a combination of welfare and repressive approaches are typically applied. While this reflects the essence of order 560-00-

334/2018-01 on preventing the abuse of “street children”, the repressive provisions of the order are clearly not applied in every case. Rather, responses are typically inconsistent and contradictory, varying from case to case, plainly guided by the individual beliefs of the practitioners involved (social workers, teachers, health care workers, police, communal police, etc.). In our experience, rarely is a child rights approach applied. This is unsurprising given that, beyond the very basic repressive instructions provided in order 560-00-334/2018-01, there is no strategy, protocols or training available for practitioners that come into contact with children in street situations. As a consequence of indifference as much as design, Serbia systematically fails to adequately protect the rights of children in street situations.

While children in street situations in Serbia are generally failed by duty bearing institutions, it is important to highlight that numerous individual practitioners –social workers, mediators, teachers, health care and others– make genuine and significant efforts protect the best interests of children in street situations and support their development. All credit to them.

Conclusions

Children should not be abandoned to live or work on the street. It is dangerous and commonly results in the violation of the majority of the rights of the child. Children in street situations have the same rights as any other child. A strategy on children in street situations should be developed and implemented without delay to protect their rights. There are severe lack of developed services and measures to protect children working on the streets in Serbia. It is necessary to invest in support programmes for children in street situations and their parents. The application of existing regulations is often reduced to repression. Articles of law and/or professional standards should be developed to protect rather than repress children in street situations. Order 560-00-334/2018-01 on preventing the abuse of “street children” and Article 12 of the Law on Public Order and Peace should be repealed immediately. Legal standards of protection against violence and abuse must not be lowered – rather, legal provisions that protect children in street situations must be operationalized and strengthened in line with a child rights approach, as described clearly in General Comment 21.

For too long, children in street situations in Serbia have been ignored, mistreated and criminalized. It is time for change. General Comment 21 on children in street situations provides clear, authoritative guidance on how to develop a strategy on children in street situations. The Serbian Government should provide the leadership necessary to put principles into practice, in order to ensure the rights of all children in the country are protected.

2 Contributors to this report

CYI would like to thank the duty-bearing public institutions and CSOs that have contributed to consultations as part of the preparation of this report: The Ministry for Human and Minority Rights and Social Dialogue, Ministry of Family Welfare and Demography, Ministry of Justice, Ministry of Construction, Transport and Infrastructure, Ministry of Youth and Sports, Ministry of Education, Science and Technological Development, the Council for Child Rights of the Government of Serbia, Protector of Citizens (ombudsman) of RS, Statistical Office of RS, Republic Institute for Social Protection, City Centre for Social Work of the City of Belgrade, Drop-In Shelter for Children and Youth in Novi Sad, Friends of Children of Serbia, Friends of Children-Pozarevac, Friends of Children-Zemun, Friends of Children-Kragujevac, StartHub-Kosjerić, Okular-Cicevac, Uzice Child Rights Centre, Creative Pedagogy-Pozarevac, EduLink-Arandjelovac, Imagination Group-Prijepolje, and SOS Children's Villages Foundation Serbia.

While the input provided by these contributors suggests varying degrees of understanding – and indeed familiarity – with the guidance provided in General Comment 21, we are nonetheless grateful for their willingness to contribute.

In particular, we would like to thank the Ministry for Human and Minority Rights and Social Dialogue. The Ministry has been constructive and supportive from the outset, recognising that children in street situations are a vulnerable and currently underserved group of rights holders in Serbia. This kind of frank and open attitude to dialogue on human and child rights issues, which do not show Serbia in the best light, is undoubtedly difficult for duty-bearing public institutions, but it is both welcome and absolutely necessary in order to recognise the problems at hand and make positive change.

Several Ministries and public institutions, including key duty bearers with clear and vital roles to play in protecting the rights of children in street situations, failed to respond to repeated requests for input to this report: Ministry of Labour, Employment, Veterans and Social Affairs, Ministry of Interior, Ministry of Health, City of Belgrade, Directorate for Cooperation with Churches and Religious Communities of the City of Belgrade, National Academy of Public Administration, and the Chamber of Commerce and Industry of Serbia.

This failure shows a concerning attitude toward cooperation and accountability. General Comment 21 makes clear that States should cooperate with non-state actors in monitoring the implementation of legislation, policies and services through social accountability mechanisms.

Among the Ministries and public institutions that failed to respond to requests for input, it is particularly concerning that the Ministry of Labour, Employment, Veteran and Social Policy, which should be playing a leading role in protecting the rights of children in street situations, and the drop-in shelter for children and youth in street situations of the City of Belgrade, one of the few state-funded services for street children in the country, chose not to contribute to this report.

About the Centre for Youth Integration

The Centre for Youth Integration is an independent Belgrade-based non-profit association of citizens that provides specialized services and personal support to street-involved children and children at risk of becoming street-involved and their families.

The Centre for Youth Integration currently provides support to over 600 children and youth in street situations in Belgrade. Since 2007, we have provided support to over 2,000 children and their families.

The Centre for Youth Integration delivers support to children and their families at specialized facilities, on the streets and in the communities where they live through our drop-in shelter and outreach services, education programme, and employment programme. Alongside these services, we provide psychosocial support child migrants in Serbia through our child migrant programme.

We treat children with care and their families with respect, no matter their situation. We take pride in knowing the children and families we support, and in understanding their circumstances and needs from their perspective. Building long-lasting trust and cooperation is the foundation of our work.

The **drop-in shelter and outreach service** provides specialized psychosocial support children in street situations, aged 5 to 15, in Belgrade. The service is provided at two facilities (drop-in shelters), located in the Municipality of Zvezdara and the Municipality of Novi Beograd and through outreach on the streets and in the informal Roma settlement communities where the overwhelming majority of children in street situations in Belgrade live. The service has three main components: meeting children's immediate, urgent needs for shelter, food, clothing, hygiene and protection; providing individualized psychosocial support tailored to each child's specific needs and circumstances; and mediating on behalf of children and their families to ensure access to public services, focusing on –but not limited to– education, health care and social protection/welfare, in accordance with children's rights. Currently, 360 children regularly visit the drop-in shelters to access support. The drop-in shelter service benefits from generous public donations, which covers significant proportion of the operating costs of the shelters.

Our **education programme** supports children living in two large informal settlements in Belgrade to participate in preschool and primary school. In cooperation with preschools and schools, we support parents to enrol their children, accompany children from the informal settlements where they live to preschool, provide learning support to children in classrooms and at weekends, and offer material support, such as winter shoes and coats. Currently our education programme supports 160 children. Since 2010 the programme has support over 700 beneficiaries to enrol in and attend school. The programme benefits from the involvement of many

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volunteers, who lead children to and from preschool every day and provide learning assistance to children at weekends.

Our **employment programme** offers a pathway into formal employment for vulnerable Roma youth. The programme supports vulnerable young people to gain a vocational qualification, work experience (at our social enterprise, Café Bar 16, and with other employers in Belgrade), and to get a job. Annually, 20 vulnerable young people participate in the programme. To date, the programme has assisted 60 vulnerable Roma youth to get a job. Through our Inclusive Employers Network, this programme benefits from the support of many local business, who offer jobs to the young people we support.

Our **migrant programme** has provided information sharing and psychosocial support services to unaccompanied and separated children and children in transit with their families since 2015. To date, we have assisted over 15,000 child migrants at locations across the country. The assistance we provide has evolved to include education support for child migrants staying in Serbia. We cooperate closely Save the Children as well as with other local and international agencies and CSOs.

In November 2017, the Centre for Youth Integration organised the conference “Improving the quality of services for street-involved children in Serbia in line with UN General Comment 21”. Serbian and international officials and professionals in the field of social and child protection discussed General Comment 21 and possibilities for the implementation and improvement of services for children who live and/or work on the street in Serbia.



Introduction

4.1. General Comment 21 on children in street situations

The United Nations Committee on the Rights of the Child issued General Comment 21 on the Rights of Children in Street Situations in June 2017. The Comment provides clear and authoritative guidance to States on how to develop comprehensive, long-term national strategies for protecting the rights of children in a street situation in accordance with the Convention on the Rights of the Child.

The Comment notes that children in street situations experience violations of a large majority of the rights of the child. While the provisions of the Convention of the Rights of the Child are applicable to all children, General Comment 21 makes clear that, due to the myriad rights violations experienced by children in street situations, States must make special efforts to protect their rights.

General Comment 21 is the first time the Committee on the Rights of the Child has provided guidance to States on protecting the rights of children in street situations. As such, it is an important milestone for efforts to protect and include children in street situations around the world.

The purpose of this report is to assess Serbia's progress towards implementing the guidance provided in General Comment 21 since its publication in 2017.

4.2. About General Comments

General comments are issued by United Nations treaty bodies, such as the UN Committee on the Rights of the Child, to clarify the duties of States regarding certain provisions of treaties and suggest approaches for implementing treaty provisions. For example, General Comment 21 clarifies how the Convention on the Rights of the Child should be applied by States to children in street situations.

4.3. Definition of children in street situations

Numerous terms are used to describe children in street situations, including “street children”, “children on the street”, “runaway children”, “children living and/or working on the street”, “homeless children”, “street-connected children” and “street-involved children”. General Comment 21 uses the term “children in street situations”, which is defined as (a) “children who depend on the streets to live and/or work, whether alone, with peers or with family; and (b) a wider population of children who have formed strong connections with public spaces and for whom the street plays a vital role in their everyday lives and identity”. The Comment clarifies

that “this wider population includes children who periodically, but not always, live and or work on the streets and children who do not live or work on the streets but who regularly accompany their peers, siblings or family in the streets.” Further the term “street” is understood to mean a wider range of places, including street markets, parks, public squares and other community spaces, and bus and train stations.

5 Summary of the authoritative guidance provided to States in General Comment 21

General Comment 21 makes clear that the rights of the child, as set out in the United Nation Convention of the Rights of the Child, apply equally to all children; children in streets situations are no exception. To apply the provisions of the Convention of the Rights of the Child, a child rights approach is essential. A child rights approach recognizes children as rights holders and States –and their institutions– as duty bearers. As duty bearers, States are obliged to uphold the rights of children. In a child rights approach the process of realizing a child’s rights is as important as the end result. A child rights approach respects children’s dignity, life, survival, wellbeing, health, development, participation and non-discrimination.

General Comment 21 provides guidance for states on developing strategies on children in street situations that is both authoritative and concise. We encourage readers of this report to take a few minutes to read General Comment 21 for themselves. The summary provided here copies verbatim many of the key points of section B of General Comment 21, while paraphrasing the remaining points.

To comply with the obligations under the Convention on the Rights of the Child, General Comment 21 urges States to adopt holistic, long-term strategies on children in street situations, and allocate the necessary budgets to implement them. From the outset, States should take a cross-sectoral approach, recognizing that policy in one areas impacts on policy in another.

To address the multiple causes of children in street situations, which range from structural inequalities (such as poverty, social exclusion and discrimination, as in Serbia) to family violence, States are advised that a combination of legal, policy and service provision changes are likely to be needed.

As a first step, States should remove any legal provisions that directly or indirectly discriminate on the grounds that children –or their parents or family– are in street situations, and abolish provisions allowing or supporting the round-up or arbitrary removal of children and their families from the streets or public spaces. States should also abolish offences that criminalize

or disproportionately affect children in street situations, such as begging, breach of curfews, loitering, vagrancy and running away from home.

States should take steps to actively protect children in street situations, starting with the adoption of a law on protecting children in street situations, and put in place policies, mandates, operating procedures, guidelines, services, and oversight and enforcement mechanisms. Key stakeholders, including children in street situations, should be involved in this process.

States should adopt a legal definition of children in street situations, as a basis for the application of laws, policies and other measures; however, General Comment 21 make clear that the lack of a legal definition is not a valid reason to delay abolishing discriminatory legislation and practices, or adopting laws, policies and other measures aimed at protecting children in street situation.

States are obliged to help parents (and caregivers) to secure the necessary living conditions for a child’s optimal development. This applies to children in street situations as much as any other child.

Practical measures to prevent and respond to children in street situations should be based on a child rights approach and implemented within a holistic child protection system. Child protection systems must be (re)designed to ensure they reach children in street situations and incorporate the specific services they need.

Child protection systems must provide a continuum of care, across all relevant contexts, including prevention, early intervention, street outreach, helplines, drop-in shelters, day-care centres, temporary residential care, family reunification, foster care, independent living or other short- or long-term care options. Strategies must make clear that a child rights approach needs to be applied in each and every context.

States should make information available to children in child-friendly and accessible formats, and children in street situations should be supported to understand and navigate child protect systems. The administrative burden and delays in gaining access to services should be reduced.

States should commit to fulfilling human rights beyond childhood by putting in place follow-up mechanisms to support children in alternative care and in street situations as they transition to adulthood at the age of 18, avoiding an abrupt termination of support.

Strategies on children in street situations should recognise State and non-state actors as legitimate stakeholders in both developing and implementing legislation, policies and other measures aimed at protecting children in street situations. States should support civil society, as complementary actors, to provide personalized, specialist services for children in street situations through funding, accreditation and regulation, and are obliged to ensure non-State

service providers operate in accordance with the provisions of the Convention on the Rights of the Child. States should also enact measures to ensure that businesses that come into contact with children in street situations meet their responsibilities regarding the rights of children.

States should provide pre-service and in-service basic training on child rights, child protection and the local context of children in street situations for all professionals who may come into direct or indirect contact with children in street situations, in such areas as policymaking, law enforcement, justice, education, health, social work and psychology.

States should provide in-depth training on a child rights approach, psychosocial support and children empowerment for professionals with a mandate to work with children in street situations (such as street-based social workers and child protection units of police services). Professionals working with children in street situations should be involved in participatory development of operating procedures, good practice guidelines, strategic directives, plans, performance standards and disciplinary codes, and measures put in place to support them to implement these principles in practice.

States should also put in place measures to sensitize and train other stakeholders, such as transport workers, media representatives, community and spiritual/religious leaders and private sector actors, who come into contact with children in street situations, and encourage them to adopt the Children's Rights and Business Principles.

States should ensure children in street situations can access health and education services, justice, culture, sport and information, and provide specialised services for children on the streets delivered by trained social workers with a good understanding of the circumstance of local children and families in street situations. States should recognise that, although the State is the primary duty bearer, activities by civil society may complement the State's efforts to develop and deliver personalised service provision to children in street situations.

States should recognise that situations vary locally, and that a successful approach relies on a good understanding of local contexts and individualised support for children. For these reasons, care must be taken not to lose the focus on children when scaling up or replicating initiatives.

States are encouraged to support local, specialized interventions with adequate budgets, which are often led by CSOs with local expertise. Such local initiatives should be coordinated with local governments and supported by the State. Children in street situations should be supported to participate in the design of such initiatives, as part of a local, decentralised, bottom-up planning process.

Clear monitoring and accountability mechanisms are required to ensure the effective implementation of legislation, policies and services. Children in street situations should be involved in monitoring and accountability mechanisms, such as coalitions of State and non-State actors.

Public institutions with mandates for promoting and monitoring the implementation of the Convention of the Rights of the Child should be easily accessible to children in street situations.

Children in street situations that suffer human rights violations must have access to effective legal and other remedies, including legal representation. When domestic remedies are exhausted, access to international human rights mechanisms should be available, including the procedure set up by the Optional Protocol to the Convention on the Rights of the Child.

States should set up systematic, rights respecting, participatory mechanisms to collect data and share disaggregated information about children in street situations. Collection and use of such data must not stigmatize children in street situations. Data collection should be integrated in to national mechanisms for collecting data about children, but should not rely on solely on household surveys, in order to ensure children living outside household settings are covered. States should recognise that street situations change rapidly and, accordingly, conduct research periodically to ensure policy and practices are up to date.

6

Data about children in street situations (or lack of it)

6.1. Available data

There are no official data about children in street situations in Serbia; indeed, children in street situations are not even officially recognised as a specific category of vulnerable children. At no point has Serbia tried to systematically document or count the number of children in street situations in the country.

General Comment 21 notes that an absence of data makes children in street situations invisible, which leads to policies not being developed and measures that are ad hoc, temporary or short term - as is the case in Serbia. General Comment 21 advises that States should develop systematic, rights-respecting participatory mechanisms to collect data and share disaggregated information on children in street situations in order to guide the development of evidence-based policies and services. Serbia should do this immediately.

Due to the lack of official data collection, the number of children in street situations in Serbia is unknown. However, some data are available about the situations in Belgrade and Novi Sad -the only locations in the country with specialised services for children in street situations- which offer some indication of the number of children in street situations in these places and set a baseline for the scale of the issue nationally.

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The City Centre for Social Work in Belgrade, as part of consultations for this report, reported that in 2020 there were 16 children in street situations in the territory it covers. While the City Centre for Social Work in Belgrade should be credited for collecting data on children in street situations, and the lack of an agreed, official definition of what constitutes a child in a street situation in Serbia (see below) may result in children in street situations being counted in different ways, this figure is without doubt an extreme undercount.

For comparison, the drop-in shelters for street-involved children operated by the Centre for Youth Integration in Belgrade (at two locations) were regularly visited by 370 children (aged 5-15) in 2021. This figure represents the minimum number of verified children in street situations in Belgrade. Unfortunately, there are certainly many more children in street situations in Belgrade that do not visit the drop-in shelters to receive support, indicating that the true number is higher.

A survey of households in 28 informal Roma settlements in Belgrade, conducted by the Centre for Youth Integration in 2018, indicated that the number of children involved in some kind of work on the streets is probably at least 600, and is likely significantly higher. Centre for Youth Integration will undertake a follow up survey of households in informal settlements in Belgrade in 2022, which will provide more detailed and up to date data about the situation.

The drop-in shelter for children and youth in Novi Sad, as part of consultations for this report, reported that 418 children in street situations currently use the service. This figure offers a baseline minimum for the number of children in street situations in Novi Sad.

The available data about the situation in Belgrade and Novi Sad indicate that there are more than one thousand children in street situations in these two cities alone. How representative these situations are of the rest of the country is unclear.

Input from CSOs that work with children, collected as part of the preparation of this report, as well as anecdotal evidence, indicate that the situation varies quite significantly across the country, including several organisations that reported that there are no (known) children in street situations in the communities in which they work (mostly smaller towns).

Estimates of the overall number of children in street situations in Serbia made by CSOs that participated in consultations for the preparation of this report also varied widely, ranging from 2,000 (a common estimate) to 10,000. The available evidence does not clearly support or contradict the veracity of these estimates. Indeed, the wide variation in estimates is more indicative of the lack of clarity on the scale of the issue and, more fundamentally, how a child in a street situation is defined, than of the actual number of children in street situations in the country.

6.2. Impact of the COVID-19 Pandemic on children in street situations

While the number of children in street situations is unclear, there is evidence that it has substantially increased during the COVID-19 pandemic. The number of children visiting the drop-in

shelters operated by the Centre for Youth Integration in Belgrade increased by almost a third in 2020-21, while the number of children observed on the streets also increased. This is perhaps unsurprising. The prolonged period of regular school closures, and “on-line learning” that was simply inaccessible to children in the poorest families, combined with lockdowns that closed the public spaces in which many families that live in informal settlements generate vital income, created verdant conditions for children to become street-involved. That the increase in children in street situations has continued since lockdowns ended and children have returned to more regular school attendance is concerning.

7

Approaches to children in street situations

7.1. Perceptions of children in street situations in Serbia

Children in street situations are widely viewed in Serbia –among both the general public and professionals that come into contact with children in street situations– to be victims of exploitation by their parents or other members of the Roma community, which shapes the response of duty bearing public institutions / practitioners.

Reality is more complex. While there is evidence that some children in street situations in Serbia are being exploited, including by their parents, experience shows that most children in street situations spend time on the streets –working alongside and/or in the care of their parents, siblings and/or peers– in circumstances that neither the child nor parent(s) perceive to be exploitative. Instead, in the face of extreme poverty and a lack of available alternatives, children (and parents) primarily perceive working on the street, including begging, as a means of survival. A special report on the rights of the child by the Protector of Citizens of RS, published in 2018, highlighted this point.

7.2. Approaches to children in street situations in Serbia: Policy

There is no legal or official definition of children in street situations in any Serbian law, regulation, strategy or action plan. General Comment 21 provides a clear definition of children in street situations, which Serbia should adopt.

While an increasingly comprehensive and progressive legislative framework seeks to protect children in Serbia, the State continues to discriminate against children in street situations and puts them at risk of violations of the Rights of the Child not faced by other children.

Children in street situations are not specifically referred to in any Serbian legislation. However, articles in three laws –the Law on Public Order and Peace, Criminal Code and Family Law– apply solely, in practice, to children in street situations, all with potentially negative outcomes for children.

Such negative outcomes are explicitly required by order 560-00-334/2018-01 on preventing the abuse of “street children”. The order instructs centres for social work to coordinate with the police service to take a series of repressive measures against children in street situations, including separating children from their parents, which directly and seriously violate a child’s rights.

Several strategies and plans refer to children in street situations explicitly or to situations –mainly related to begging– that are solely relevant to children in street situations (children that are being in public spaces *are* children in street situations). These policy documents propose more progressive approaches that in line with the Convention of the Rights of the Child and the guidance provided by General Comment 21, but fall short of a comprehensive, holistic strategy on children in street situations that General Comment 21 calls for.

Serbia’s policy on children in street situations must be strengthened without delay, eliminating discriminatory policies and building on existing strategies and plans that recognise children in street situations and propose measures that are aligned with the guidance provided by General Comment 21.

7.2.1. Law on Public Order and Peace

Article 12 of the Law on Public Order and Peace specifically criminalizes begging that endangers the peace of citizens or disturbs public order. By definition, the law relates to begging in public places and thereby directly and specifically targets children and adult in street situations. The Law directly and purposefully criminalizes children in a street situation and no other children. The law offers no limiting definition of what constitutes “the peace of citizens”, leaving it open to abuse. The guidance provided by General Comment 21 clearly indicates that this Law is not in accordance with the UN Convention on the Rights of the Child, which has supremacy over domestic law, and should therefore be immediately repealed.

7.2.2. Criminal Code and Family Law

Article 193 of the Criminal Code outlaws abuse and forced labour and begging that is harmful to a child’s development². While prohibition of forced labour is clearly necessary, begging by children occurs almost exclusively on the streets and other public spaces and is therefore, in

²The Criminal Code (article 193, paragraph 2) states that “A parent, adoptive parent, guardian or other person who abuses a minor or forces them to overwork or into work that does not correspond to the age of the minor or begging or out of self-interest leads them to perform other actions that are harmful to their development, shall be punished by imprisonment of three months to five years.”

practical terms, solely relevant to children in street situations. A child working or begging in a public space *is* a child in a street situation. General Comment 21 makes clear that approaches that try to prevent begging and other survival behaviour directly discriminate against children in street situations and must be prohibited.

Article 81 of the Family Law prohibits forced labour of children *by their parents* and proscribes that parents that do so can be *completely deprived of parental rights*. While the Law cannot be said to specifically target children in street situations, it does have special –negative– implications for these children and their parents.

Together, Article 193 of the Criminal Code and Article 81 of the Family Law criminalize parents for activities that children in street situations routinely undertake (i.e. begging and other work on the street) in order to survive, for which parents can be punished by imprisonment or complete deprivation of the parental rights, thereby raising the prospect of separating children from their families.

Despite the real risks to children of begging and working on the street, separating children from the parents (due to imprisonment or deprivation of their parental rights) is very rarely in the interests of the child, as the outcomes for children placed in alternative care in Serbia attest, and is a violation of child’s right to a family life.

As the Committee on the Rights of the Child has repeatedly reminded States, a child’s right to a family life requires States to make exhaustive efforts to keep families together, which cannot credibly be claimed to be the case in Serbia, and a child should never be separated from their family for economic reasons.

While the provisions of the Criminal Code and Family Law may be well intentioned, and prohibition of abuse, forced labour and exploitation of children by parents and others is clearly necessary, in their current form this existing legislation discriminates against children in street situations and puts them at unequal risk of being separated from their families due, largely, to circumstances of extreme poverty, which clearly violates the rights of the child.

The law must be both clearer and more sophisticated, differentiating between work on the street, including begging, and parental abuse, forced labour and exploitation, in accordance with the realities of children in street situations, and must prioritise keeping families together while still protecting children in street situations from these real risks. This will require an informed, thoughtful child rights based approach from law makers.

7.2.3. Order 560-00-334/2018-01 on preventing the abuse of street children

Order 560-00-334/2018-01 on preventing the abuse of “street children” was issued originally issued in 2014 by the Minister of Labour, Employment, Veterans and Social Affairs and then re-issued, by the then Minister Zoran Đorđević, in May 2018.

Order 560-00-334/2018-01 instructs centres for social work to form a special teams consisting of an expert from the guardianship authority (i.e. centre for social work), a police officer and a representative of the regional health centre.

The order sets out the following instructions:

- In all cases where it is known that children are exploited, in accordance with Article 332, paragraph 2 of the Family Law, Centres for social work (the guardianship authority) are obliged to immediately take children in street situations away from their parents, guardians or persons with whom they are found [on the street] and place them in a social welfare institution or foster family;
- To protect children from abuse and neglect by parents, guardians or persons with whom children are found [on the streets] by filing criminal charges on the grounds that a criminal offense of neglect and abuse of children may have been committed, under Article 193 of the Criminal Code of the RS;
- To take protect children from parents who abuse, neglect or grossly abuse parental rights by initiating a procedure for complete deprivation of parental rights in accordance with Article 81 of the Family Law of the Republic of Serbia;

Order 560-00-334 / 2018-01 is an extraordinary failure of child protection policy-making. The order proposes measures that solely and systematically discriminate against children in street situations. It orders centres for social work to take action to separate children in street situations from their families on sight. The order demonstrates exactly how the provisions of the Criminal Code and Family Law are open to misuse. It is astonishing that Mr Đorđević, then Minister of Labour, Employment, Veterans and Social Affairs, re-issued the order in 2018, AFTER General Comment 21 had been issued (in 2017).

During consultations undertaken as part of the preparation of this report, the Ministry for Human and Minority Rights and Social Dialogue made clear that the provisions of order 560-00-334/2018-01 to take children in street situations away from their parents or guardians, initiate court proceedings to take away parental rights, prevent contact between parents and children, impose measures to protect against violence and file criminal charges against parents are contrary to the Convention on the Rights of the Child. This unambiguous assessment of the situation is welcome. Change is necessary.

In accordance with the guidance issued in General Comment 21, the competent authorities should immediately rescind order 560-00-334/2018-01 and replace it with appropriate protocols to protect the rights of children in street situations from exactly these kinds of abuses. We encourage the Ministry for Human and Minority Rights and Social Dialogue to provide vocal leadership in remedying this situation.

7.2.4. Strategy for the Protection of Children from Violence and Action Plan

In June 2020, the Government of the Republic of Serbia adopted the Strategy for the Prevention and Protection of Children from Violence for the period from 2020 to 2023. In section 3.7, on

“Child Labour Exploitation” the strategy refers to “children whose life or work are related to the street” and “street children”, however only in the context of child begging (no other aspect of street-involvement among children is referred to).

In stark contradiction of Order 560-00-334/2018-01 on preventing the abuse of “street children”, the Strategy for the Prevention and Protection of Children from Violence provides a frank, critical analysis of the Serbian States efforts to “prevent, combat and eradicate child begging”, stating that there is a “lack of vision, strategies and effective prevention programs”. While the analysis is narrowly focused on child begging, it describes well some of the key issues holding back a more effective, child rights approach to children in street situations in Serbia.

The Strategy states that:

- There is a lack of data about child begging, and the data that does exist is inconsistent and unreliable;
- There is insufficient understanding of the causes of child begging among duty bearing institutions (highlighting that social protection professionals and police believe that the main drivers of child begging are “belonging to the Roma ethnic group” and exploitation by “organized groups”);
- Roma children are at high risk of becoming involved in begging due to extreme poverty, ghettoization and exclusion from society, and lack of education and unemployment among parents.
- Although all public sector experts are aware of the multiple threats to the life, physical health and development of child begging, state institutions do not conduct field work or field activities to directly protect and reduce harm to children.
- Children involved in begging are not clearly recognized as victims of exploitation, violence, abuse and neglect in either regulations or in practice, and from the age of 14 children that beg are considered [under current law] to be perpetrators of a misdemeanour crime.
- Institutions responsible for the prevention and reduction of child begging have insufficient capacities, both in terms of material resources and staff, and that there are no professional standards that determine the conduct of state institutions in cases of child begging.
- When measures are taken, they are typically disorganized, unsystematic and spontaneous, and the effects of the measures are neither monitored nor analysed.
- Criminalizing and sanctioning child beggars and their parents has not reduced the number of “street children”, including those involved in child begging.
- Measures implemented by competent institutions in response to child begging are not aimed at the causes of begging.
- Preventive measures – those that are available and can to some extent affect the causes of child begging (such as material assistance) – are only implemented on a small scale.
- There is no engagement of local self-government units, in accordance with their competencies and allocated funds, to provide financial and any other assistance

and support to institutions and CSOs in activities to reduce and prevent child begging and protect children involved in begging.

While such a frank assessment of the situation is welcome, the Strategy narrowly focuses on child begging and fails to recognize the issue in the wider context –and circumstances– of children in street situations.

The new strategy for the prevention and protection of children from violence, from 2024 onwards, should recognize children in street situations and be aligned with the guidance provided by General Comment 21 or a national strategy on children in street situations, if one is developed in the meantime.

The Action Plan for the Implementation of the Strategy for the Prevention and Protection of Children from Violence for the period 2020-21, under measure 3.2., “Establishing, developing and ensuring the sustainability of measures aimed at protecting children from violence” foresaw action (activity 3.2.1.) to “Improve the capacities of institutions and bodies at the local level for cross-sectoral cooperation, by establishing local teams for the protection of children from abuse and neglect in the street situation”.

In principle, this is an important and welcome step forward. However, the duty-bearing institutions that contributed to the preparation of this report did not indicate if the proposed “local teams” have been established. If and when such “local teams for the protection of children from abuse and neglect in street situations” are established, it is vital that they take a child rights approach, rather than perpetuating the combination of “welfare” and “repressive” approaches that have characterized the treatment of children in street situations in Serbia to date.

7.2.5. General Protocol for the Protection of Children from Violence

On February 10, 2022, the Government of the Republic of Serbia adopted a General Protocol for the Protection of Children from Violence, replacing the General Protocol for the Protection of Children from Abuse and Neglect adopted in 2005. The Protocol does not specifically refer to children in street situations, but does refer to children involved in begging, which in almost all cases are children in street situations.

The purpose of the Protocol is to systematically prevent of all forms of violence against children and ensure effective, intersectoral protection measures in cases of violence against children. The new Protocol defines more than 20 forms of violence against children, including physical and peer violence, domestic violence, sexual violence and digital violence, child labour abuse and child marriage, which the Protocol describes as forms of violence that grossly violate the rights of the child.

The Protocol affirms that exploitation of children through begging is among the worst forms of child labour and exploitation. The Protocol describes child begging as activities in which a child seeks money or other material value, irrevocably or without providing a counter-service,

by invoking pity due to poverty, health, religion or other reasons. The Protocol states that if a child is accompanied by a parent or other adult, then the accompanying parent/adult should be considered to be begging, even if they are not doing so directly.

The Protocol rightly seeks to protect children that are begging from labour abuse, exploitation and trafficking. However, Protocol lack provisions to ensure the rights of children in street situations are properly considered and protected.

7.2.6. Strategy of Social Inclusion of Roma for the Period from 2016 to 2025

The Strategy of Social Inclusion of Roma for the Period from 2016 to 2025 refers to “children that live and/or work on the street” in the context of education and employment, and recognizes the multiple risks children in street situations are exposed to.

Under special objective 5 (on improving access to social security services and availability of financial aid for the purpose of reducing poverty and increasing social involvement of Roma men and women in the local community), the strategy sets out two measures directly targeting children in street situations. The measures call for (a) development and institutionalization of local protocols for the protection of Roma children who live and/or work in the streets and securing sustainable financial support or city services in the community, such as shelters, which contribute to their protection and social inclusion; and (b) organizing support for children who live and/or work in the streets, accompanied by increased use of the resources of social security institutions which provide permanent or temporary accommodation services, including intensive therapy services for children with structural personality or behavioural disorders.

Although these measures cover only a small part of the guidance provided in General Comment 21, they are welcome proposals that should be put into action. In doing so, a child rights-based approach must be applied. Any services, such as the “intensive therapy services for children with structural personality or behavioural disorders” must be implemented in accordance with a child’s rights, and must not be forced upon them due to perceived “behavioural disorders”. Being a in a street situation is not a behavioural disorder.

7.2.7. Government Council for Monitoring the Implementation of the Recommendations of the UN Human Rights Mechanism

The Ministry of Human and Minority Rights and Social Dialogue reported that the Government Council for Monitoring the Implementation of the Recommendations of the UN Human Rights Mechanisms has drafted a plan to fulfil all the recommendations of the UN human rights mechanisms sent to the Republic of Serbia, including the recommendation of the Committee on the Rights of the Child. The plan contains a total of 392 current recommendations and provides information on their status, purpose and deadline, as well as the competent authorities in charge of their implementation.

Paragraph 61 of the plan sets out recommendations relating to General Comment 21, as follows:

- a. Estimate the number of children living or working on the streets and studies on the causes of their situation;
- b. Implement, monitor and evaluate the Special Report on Child Begging in the Republic of Serbia, with the active participation of children living and working on the streets;
- c. Ensure that support, in particular reintegration with the family or placement in an alternative care system, is provided with full respect for the best interests of the child and that due regard is paid to their attitudes in accordance with their age and maturity.

The Ministry stated that reporting on the implementation of the Convention on the Rights of the Child is on-going. The Republic of Serbia should submit its report to the Committee on the Rights of the Child by the end of May 2022.

NOTE: In 2014, the Committee on Economic, Social and Cultural Rights called on the State party to improve the monitoring of child labour, and in particular to strengthen control of labour inspection in order to detect and prevent the worst forms of child labour, especially children working on the streets. The State party should also promote protection and reintegration programs that focus on family empowerment and the elimination of various forms of abuse and economic exploitation of children, including positive parenting programs for marginalized communities, and collect information, including statistics. These recommendations have not been implemented. In March 2022, the Committee on Economic, Social and Cultural Rights did not make any recommendation that explicitly referring to children in street situations.

7.2.8. Strategy for the Prevention and Protection against Discrimination

During consultations as part of the preparation of this report, the Ministry for Human and Minority Rights and Social Dialogue noted that the new Strategy for the Prevention and Protection against Discrimination for the period 2022-2030 recognizes children in street situations and stated that the Ministry is currently developing a two-year action plan that will specify measures aimed at implementing the strategy. The Ministry should take this opportunity to set out tangible actions to protect children in street situations from discrimination, in accordance with the guidance provided in General Comment 21.

The Ministry for Human and Minority Rights and Social Dialogue also stated that it has begun the process of drafting the first National Human Rights Strategy, which will be based primarily on ratified international human rights treaties and accompanying comments interpreting their application. This is an important step and an opportunity to embed action to protect the rights of children in street situations into a wider human rights strategy in Serbia. However, the State should not wait for this process to be concluded before starting the development of a strategy on children in street situations. The time for a strategy on children in street situations in Serbia is now.

7.3. Approaches to children in street situations in Serbia: Practice

General Comment 21 notes that various approaches are applied around the world with respect to children in street situations, in some cases in combination. These approaches are summarised in General Comment 21 as a “child rights approach”, in which the child is respected as a rights holder and decisions are made with the child; “a welfare approach”, involving the “rescue” of children from the street, whereby children are perceived to be victims and decisions are made on their behalf without serious consideration of their views; and “a repressive approach”, whereby a child is perceived to be a delinquent.

General Comment 21 reminds States that “welfare” and “repressive” approaches fail to take account of the child as a rights holder and result in forcible removal of children from the streets, which further violates their rights. General Comment 21 also makes clear that only a rights-based approach is acceptable, and notes that claiming that welfare and repressive approaches are in the best of children does not make them rights based.

Despite a raft of policies that increasingly promote child rights and measures to safeguard them, and notwithstanding repressive policies directly targeting children in street situations, most notably order 560-00-334/2018-01 on preventing the abuse of “street children”, experience shows that the main approach of duty bearing public institutions in Serbia towards children in street situations is *inaction*.

There is a severe lack of state funded services for children in street situations to deliver the support they need. Drop-in shelters in the cities of Belgrade and Novi Sad are the only know specialised services for children in street situations in the country.

When action is taken by other “competent” duty-bearing institutions, a combination of welfare and repressive approaches are typically applied. While this reflects the essence of order 560-00-334/2018-01 on preventing the abuse of “street children”, the repressive provisions of the order are clearly not applied in every case. Rather, responses are typically inconsistent and contradictory, varying from case to case, plainly guided by the individual beliefs of the practitioners involved (social workers, teachers, health care workers, police, communal police, etc.). In our experience, rarely is a child rights approach applied. This is unsurprising given that, beyond the very basic repressive instructions provided in order 560-00-334/2018-01, there is no strategy, protocols or training available for practitioners that come into contact with children in street situations. As a consequence of indifference as much as design, Serbia systematically fails to adequately protect the rights of children in street situations.

While children in street situations in Serbia are generally failed by duty bearing institutions, it is important to highlight that numerous individual practitioners –social workers, mediators, teachers, health care and others- make genuine and significant efforts protect the best interests of children in street situations and support their development. All credit to them.

8 Findings – Progress made by Serbia towards implementing the guidance provided in General Comment 21 on children in Street Situations

Consultations with duty bearing institutions in Serbia as part of the preparation of this report indicate that almost no action has been taken directly in response to the guidance provided in General Comment 21 since its publication. Some action has been undertaken that is in line with the guidance provided in General Comment 21, but not directly in response to it. Duty bearing institution also referred to various actions related to vulnerable children in general.

According to the duty bearing institutions that contributed to the preparation of this report, action taken directly in response to the guidance provided in General Comment 21 since its publication includes the following:

- The Ministry of Human and Minority Rights and Social Dialogue reported that it translated General Comment 21 into Serbian and distributed it to relevant institutions of the Serbian Government.
- General Comment 21 was presented at a session of the Council for Child Rights of the Government of Serbia in 2017, following the publication of the comment. There is no indication that any follow-up action was taken.
- General Comment 21 was discussed at a session of the Government Council for monitoring the implementation of the recommendations of the UN human rights mechanisms.
- The Drop-In Shelter for Children and Youth in Novi Sad, operated by the City of Novi Sad, reported that some of the Shelter's staff are thoroughly acquainted with General Comment No. 21, but that no training has been organized on the application of the guidance provided in the Comment.
- Three recommendations responding to General Comment 21 have been included in the implementation plan of the Serbian Government Council for Monitoring the Implementation of the Recommendations of the UN Human Rights Mechanisms, which call for (a) research into the number of children in street situations and its causes, (b) implementation of the Special Report on Child Begging in RS, and (c) the provision of support with full respect for the best interests of the child their views.
- The City Centre for Social Work of the City of Belgrade reported that staff are familiar with General Comment No. 21 but that they have not undergone training on the application of the guidance provided in the Comment. NOTE: No information was provided by the Ministry of Labour, Employment, Veterans and Social Affairs, so it is

unclear if staff working in other city and municipal centres for social work in Serbia are aware of General Comment 21.

Several other actions relevant to the guidance provided in General Comment 21 are known to have been implemented:

- In 2019 the City of Belgrade opened a drop-in shelter for children. No information on the types of services provided or number of service users is available. Neither the Drop-In Shelter nor the City of Belgrade responded to requests for input to this report.
- The Action Plan for the Implementation of the Strategy for the Prevention and Protection of Children from Violence for the period 2020-21, proposed action (activity 3.2.1) to "Improve the capacities of institutions and bodies at the local level for cross-sectoral cooperation, by establishing local teams for the protection of children from abuse and neglect in the street situation". However, it is unclear if any action has been taken to establish such teams.
- In 2017 the Government of Serbia adopted a decree on the determination of dangerous work for children, which in part covers the work of child in street situations.
- In 2016 the City of Belgrade adopted a "Protocol on Actions of Bodies, Institutions and Organisations in Situations of Work with Children Involved in life and Work on the Streets of the City of Belgrade", which defined the roles and responsibilities of bodies, institutions and organisation that come into contact with children in street situations. The protocols have not been implemented.
- A Rulebook on detail conditions and standards for the provision of social protection services, originally adopted in 2013 and amended in 2018 and 2019, under articles 77-82 sets out minimum standards the drop-in shelter service for children in street situations.
- Licencing for social protection services, introduced in 2013, regulates conditions the provision social protection, including drop-in shelter service for children in street situations

As the summary table (below) shows, several measures that are in line with the guidance provided by General Comment 21 have been implemented in Serbia, but almost no action has been taken directly in response to the guidance provided in General Comment 21 since the comment was published in 2017, and no serious steps been taken to develop a comprehensive strategy on children in street situations, which General Comment 21 makes clear all nations should do.

Due to the failure of several duty-bearing institutions to respond to (repeated) requests for input, we are left with an incomplete picture of an incomplete human and child rights protection system in Serbia that, experience shows, rarely reaches children in street situations.

Children should not be abandoned to live or work on the street. It is dangerous and commonly results in the violation of the majority of the rights of the child. Children in street situations have

the same rights as any other child. A strategy on children in street situations should be developed and implemented without delay to protect their rights. There are severe lack of developed services and measures to protect children working on the streets in Serbia. It is necessary to invest in support programmes for children in street situations and their parents. The application of existing regulations is often reduced to repression. Articles of law and/or professional standards should be developed to protect rather than repress children in street situations. Order 560-00-334/2018-01 on preventing the abuse of “street children” and Article 12 of the Law on Public Order and Peace should be repealed immediately. Legal standards of protection against violence and abuse must not be lowered – rather, legal provisions that protect children in street situations must be operationalized and strengthened in line with a child rights approach, as described clearly in General Comment 21.

9 Recommendations

Urgent action required:

- Order 560-00-334/2018-01 on preventing the abuse of “street children” must be rescinded immediately.
- Article 12 of the Law on Public Order and Peace should be immediately repealed.
- All professional practitioners that come into contact with street involved children –social workers, police, teachers and others– and staff of duty bearing institutions should ensure they have read General Comment 21 and thoroughly familiarized themselves with the guidance it provides. There is no excuse not to.

Specific recommendations:

- Serbia should immediately begin developing a strategy on children in street situations in accordance with the authoritative guidance provided in General Comment 21, accompanied by adequate action plan, including multi-sectoral cooperation, and necessary budget allocations for its implementation.
- Serbia should develop systematic, rights-respecting participatory mechanisms to collect data and share disaggregated information on children in street situations in order to guide the development of evidence-based policies and services.
- Serbia should adopt a definition of children in street situations (General Comment 21 provides a clear definition that Serbia could adopt immediately).
- Article 193 of the Criminal Code and Article 81 of the Family Law criminalize strengthened to protect rather than repress children in street situations.
- The new strategy for the prevention and protection of children from violence, from 2024 onwards, should recognize children in street situations and be aligned with the guidance provided by General Comment 21 or a national strategy on children in street situations, if one is developed in the meantime.

- The General Protocol for the Protection of Children from Violence should be strengthened to recognise children in street situations (rather than only addressing child begging) accordance with the guidance provided in General Comment 21.

General recommendations:

- Duty-bearing institutions and practitioners that come into contact with children in street situations must seriously consider views of children and make decisions with them, rather than for them without serious consideration of their views.
- The Protector of Citizens RS has, in the past, tried to coordinate policy and action by duty bearing institutions on children in street situations; we encourage the Protector of Citizens to continue to provide leadership and take an active role in coordinating other duty bearing institutions in developing a strategy on children in street situations.
- The Ministry of Human and Minority Rights has stated clearly that the provisions of Order 560-00-334/2018-01 on preventing the abuse of “street children” are contrary to the Convention on the rights of the child; we encourage the Ministry to take a leading role in ensuring the order is rescinded as soon as possible.

10 Report methodology

The purpose of this report is to measure Serbia’s progress toward implementing the guidance provided in General Comment 21. In particular, we have sought to identify what, if any, steps Serbia has taken to apply the comprehensive and authoritative guidance provided in General Comments 21 on implementing a holistic, child rights approach to children in street situations.

As a basis for doing this, the guidance provided in the Comment was assessed and 34 specific points of guidance were identified (see summary of Comment 21, below). These 34 points of guidance were then formulated as questions/indicators, each describing specific actions (or areas of action) required by States in order to develop comprehensive, long term national strategies on children in street situations that are in accordance with the rights of the child.

Based on the formulated questions/indicators, a comprehensive questionnaire, containing 34 mostly open-ended questions, was developed (see “summary table” in section 9, below). Anticipating that, without an overarching strategy on children in street situations, any action that has been taken in Serbia is likely to be fragmented, the use of open ended questions, typically using phrasing such as “What steps has Serbia taken to...”, or “what action has been taken to...”, which was intended to give duty bearing institutions broad scope to provide relevant information about legislation, policies and action within their areas of competency that, despite the lack of an overarching strategy, contribute to the implementation of the guidance issued in General Comment 21.

The questionnaire was first shared with the Ministry of Human and Minority Rights and Social Dialogue. The Ministry provided answers to questions within its area of responsibility and advised which other duty-bearing institutions, in accordance with their competencies, should be contacted regarding each of the other questions.

In accordance with the advice of the Ministry of Human and Minority Rights and Social Dialogue, 16 other duty-bearing institutions were sent questions related to their competencies, of which 11 responded.

Institutions from which information was requested	
<p>Institutions that responded</p> <ul style="list-style-type: none"> • Ministry of Human and Minority Rights and Social Dialogue • Ministry of Family Welfare and Demography • Ministry of Justice • Ministry of Construction, Transport and Infrastructure, • Ministry of Culture and Information • Ministry of Youth and Sports • Ministry of Education, Science and Technological Development • Council for Child Rights of the Government of Serbia • Protector of Citizens of RS • Statistical Office of RS • Republic Institute for Social Protection 	<p>Institutions that did NOT respond</p> <ul style="list-style-type: none"> • Ministry of Labour, Employment, Veterans and Social Affairs • Ministry of Interior • Ministry of Health • City of Belgrade • Directorate for Cooperation with Churches and Religious Communities of the City of Belgrade • National Academy of Public Administration • Chamber of Commerce and Industry of Serbia

Concurrently, a short questionnaire about service provision, containing nine questions, was prepared and sent to the state-funded drop-in shelters for children in street situations in Belgrade and Novi Sad (the only state-funded services specifically intended for children in street situations in Serbia), and the City Centre for Social Work in Belgrade. The state-funded drop-in shelter for children in street situations in Belgrade did not respond.

Finally, a short questionnaire was prepared for CSO containing nine questions about General Comment 21 and children in street situations in the communities in which they work, and disseminated through the Network of Organisations for Children of Serbia (MODS), a union of over 100 organisations focused on the protection and promotion of the rights of the child in Serbia. 13 organisations from across the country responded.

The answers provided by duty-bearing institutions and CSOs were then analysed and summarised (see the summary table in section 9). The available data and current legislative and policy framework on children in street situations -to the degree that it exists- was then analysed. The report was then circulated to key stakeholders for feedback.

Lastly, key recommendations, based on the guidance issued in General Comment 21 were formulated.



11

Summary of input provided by duty-bearing institutions, state institutions working directly with children in street situations, and CSOs working with children in Serbia

11.1. Summary table of action by duty bearing institutions related to guidance set out in General

Question No.	General Comment 21 Reference (Article, Line)	General	
1		Question	What action has been taken to raise awareness of General Comment 21 among professionals involved in policy making and those coming into contact with children in a street-situation?
		Contacted duty bearing institutions	- Ministry of Human and Minority Rights and Social Dialogue
		Summary of answers (provided by duty-bearing institutions)	After the adoption of General Comment 21 in 2017, the then Office for Human and Minority Rights (now the Ministry of Human and Minority Rights and Social Dialogue) translated the Comment into Serbian and distributed the document to the competent institutions. General Comment 21 was later presented at a session of the Council for Child Rights of the Government of Serbia. Additionally, General Comment 21 was discussed at a session of the Government Council for monitoring the implementation of the recommendations of the UN human rights mechanisms.
		Comments	The Centre for Youth Integration considers that insufficient activities have been carried out to raise awareness of General Comment 21 among professionals involved in policy-making and those who come into contact with children in street situations.

2		A14, L2-4	
		General Comment 21 Reference (Article, Line)	
		Question	What steps have been taken to remove provisions that directly or indirectly discriminate on the grounds of the street situation of children or their parents or family?
		Contacted duty bearing institutions	- Ministry of Human and Minority Rights and Social Dialogue
3		A14, L4-6	
		General Comment 21 Reference (Article, Line)	
3		Question	What steps have been taken to abolish provisions allowing or supporting the round-up or arbitrary removal of children and their families from the streets or public spaces?
		Contacted duty bearing institutions	- Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs - Ministry of Interior
3		Summary of answers (provided by duty-bearing institutions)	No response.
		Comments	n/a

Question No. 4	General Comment 21 Reference (Article, Line)	A14, L6-8
	Question	What steps have been taken to abolish offences that criminalize and disproportionately affect children in street situations, such as begging, breach of curfews, loitering, vagrancy and running away from home?
	Contacted duty bearing institutions	- Ministry of Interior
	Summary of answers (provided by duty-bearing institutions)	No response.
	Comments	Article 12 of the Law on Public Order and Peace (RS) specifically criminalizes begging that endangers the peace of citizens or disturbs public order. By definition, the law relates to begging in public places and thereby directly and specifically targets children and adult in street situations. The Law directly and purposefully criminalizes children in a street situation and no other children. The law offers no limiting definition of what constitutes "the peace of citizens", leaving it open to abuse. In accordance with the guidance provided in General Comment 21, Centre for Youth Integration considers that Article 12 should be repealed immediately.
Question No. 5	General Comment 21 Reference (Article, Line)	A14, L10-11
	Question	Has a law (act) on protecting children in a street situation been introduced?
	Contacted duty bearing institutions	- Ministry of Human and Minority Rights and Social Dialogue
	Summary of answers (provided by duty-bearing institutions)	The Ministry of Human and Minority Rights and Social Dialogue stated that there is no law or act that specifically concerns children in the street situation.
	Comments	No Comment

Question No. 6	General Comment 21 Reference (Article, Line)	A14, L11-14
	Question	What steps have been taken to put in place enabling policies, mandates, operating procedures, guidelines, service delivery, oversight and enforcement mechanisms? Have key stakeholders, including children in street situations, been involved in this process?
	Contacted duty bearing institutions	- Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs - Ministry of Interior - Ministry of Justice
	Summary of answers (provided by duty-bearing institutions)	The Ministry of Justice stated children in street situations are eligible for free legal aid, in accordance with the Law on Free Legal Aid, which came into force in 2019. Other duty bearing institutions did not respond.
	Comments	The Centre for Youth Integration notes that while some provisions of the Law on Free Legal aid may apply to children in street situations, this group of children is not mentioned explicitly in the law.
Question No. 7	General Comment 21 Reference (Article, Line)	A14, L14-17
	Question	What steps have been taken to develop and adopted a legal definition of "children in street situations"?
	Contacted duty bearing institutions	- Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs - Ministry of Human and Minority Rights and Social Dialogue
	Summary of answers (provided by duty-bearing institutions)	The Ministry of Human and Minority Rights and Social Dialogue stated that it is aware that a definition of "children in a street situation" has not been adopted and that doing so would enable systematic data collection. Other duty bearing institutions did not respond.
	Comments	As General Comment 21 highlights, establishing a definition of "children in street situations" is a precondition for both data collection and provision of rights-based, systemic support for this group of children.

Question No. 8	General Comment 21 Reference (Article, Line)	A15, L1-2
Question	Does the State recognize the role of non-state actors?	
Contacted duty bearing institutions	<ul style="list-style-type: none"> - Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs - Ministry of Human and Minority Rights and Social Dialogue 	
Summary of answers (provided by duty-bearing institutions)	<p>The Ministry of Human and Minority Rights and Social Dialogue stated that civil society organizations are involved in processes related to the drafting of strategic measures and laws. The Ministry also stated that the Platform of Organizations for Cooperation with UN Mechanisms (which has 17 CSO members, and includes a special cluster dealing with children's rights) has a permanent chair on the Council for Monitoring the Implementation of UN Recommendations. The Council has also signed MoUs with other CSOs, as a basis for their involvement in the work of the Council.</p> <p>Other duty bearing institutions did not respond.</p>	
Comments	While the Ministry of Human and Minority Rights and Social Dialogue is correct, the Centre for Youth Integration believes that the current approach of the State to non-State actors falls far short of the integral role foreseen by the guidance provided in General Comment 21.	

Question No. 9	General Comment 21 Reference (Article, Line)	A15, L2-5
Question	What steps has the State taken to help parents (and caregivers) to secure the necessary living conditions for a child's optimal development?	
Contacted duty bearing institutions	<ul style="list-style-type: none"> - Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs. 	
Summary of answers (provided by duty-bearing institutions)	Duty bearing institutions did not respond.	
Comments	n/a	

Question No. 10	General Comment 21 Reference (Article, Line)	A15, L5-8
Question	What steps has the state taken to support civil society in providing personalized, specialist services for children in street situations, in terms of funding, accreditations and regulations?	
Contacted duty bearing institutions	<ul style="list-style-type: none"> - Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs - Ministry of Interior 	
Summary of answers (provided by duty-bearing institutions)	Duty bearing institutions did not respond.	
Comments	n/a	

Question No. 11	General Comment 21 Reference (Article, Line)	A15, L10-11
Question	What steps has the State taken to ensure non-State service providers operate in accordance with the provisions of the UNCRC?	
Contacted duty bearing institutions	<ul style="list-style-type: none"> - Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs - Ministry of Human and Minority Rights and Social Dialogue 	
Summary of answers (provided by duty-bearing institutions)	<p>The Ministry of Human and Minority Rights and Social Dialogue stated that, within its competences, the Ministry publishes and distributes documents related to the Convention on the Rights of the Child, such as concluding observations with recommendations to the Member State, as well as general comments, to all relevant actors. The Convention on the Rights of the Child is publicly available on the website of the Ministry of Human Rights. The Ministry also provides technical and administrative support to the work of the Council for Monitoring the Implementation of UN Recommendations. At these sessions, discussions are held on the implementation of international human rights treaties, and thematic sessions are organized. The Council has an early alert mechanism, if it identifies that recommendations are not implemented at all or are delayed in their implementation. Civil society is a partner in this process.</p> <p>Other duty bearing institutions did not respond.</p>	

Question No. 11	Comments	Drop-in shelter services for children in street situations (whether provided by State or non-State actors) are subject to a licencing procedure. The Centre for Youth Integration is a licenced provider of this service. The Centre for Youth Integration does is not aware of any other mechanisms to ensure that State or non-State service providers working with children in street situations operate in accordance with the UN CRC.
Question No. 12	General Comment 21 Reference (Article, Line)	A16, L5-6
	Question	What steps have been taken to coordinate legal and policy responses and service provision for children in a street situation?
	Contacted duty bearing institutions	- Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs - Council for Child Rights of the Government of Serbia
	Summary of answers (provided by duty-bearing institutions)	Duty bearing institutions did not respond.
	Comments	n/a
Question No. 13	General Comment 21 Reference (Article, Line)	A16, L7-8
	Question	What steps have been taken to ensure support during children's transition into adulthood (beyond the age of 18)?
	Contacted duty bearing institutions	- Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs
	Summary of answers (provided by duty-bearing institutions)	Duty bearing institutions did not respond.
	Comments	n/a

Question No. 14	General Comment 21 Reference (Article, Line)	A17, L1-3
	Question	What steps have been taken to establish a holistic child protection system based on a child rights?
	Contacted duty bearing institutions	- Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs - Council for Child Rights of the Government of Serbia
	Summary of answers (provided by duty-bearing institutions)	Duty bearing institutions did not respond.
	Comments	n/a
Question No. 15	General Comment 21 Reference (Article, Line)	A17, L4
	Question	What steps have been taken to ensure the child protection system reaches children in a street situation?
	Contacted duty bearing institutions	- Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs - Ministry of Interior
	Summary of answers (provided by duty-bearing institutions)	Duty bearing institutions did not respond.
	Comments	n/a
Question No. 16	General Comment 21 Reference (Article, Line)	A17, L5-8
	Question	What steps has the State taken to ensure a continuum of care across all relevant contexts, including prevention, early intervention, street outreach, helplines, drop-in centres, day-care centres, temporary residential care, family reunification, foster care, independent living or other short- or long-term care options?

Question No. 16	Contacted duty bearing institutions	- Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs
	Summary of answers (provided by duty-bearing institutions)	Duty bearing institutions did not respond.
	Comments	n/a
Question No. 17	General Comment 21 Reference (Article, Line)	A17, L13-14
	Question	What action has been taken to ensure a child rights approach is applied in each and every context (relating to children in street situation)?
	Contacted duty bearing institutions	- Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs
	Summary of answers (provided by duty-bearing institutions)	Duty bearing institutions did not respond.
	Comments	n/a
Question No. 18	General Comment 21 Reference (Article, Line)	A17, L14-15
	Question	What steps have been taken to reduce the administrative burden and delays in children gaining access to children protection systems?
	Contacted duty bearing institutions	- Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs - Ministry of Interior - Ministry of Justice (No answer)
	Summary of answers (provided by duty-bearing institutions)	Duty bearing institutions did not respond.
	Comments	n/a

Question No. 19	General Comment 21 Reference (Article, Line)	A17, L15-17
	Question	What steps have been taken to make information available in children friendly and accessible formats to children in a street situation in order to access and navigate child protect systems?
	Contacted duty bearing institutions	Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs - Ministry of Interior - Ministry of Justice
	Summary of answers (provided by duty-bearing institutions)	Duty bearing institutions did not respond.
	Comments	n/a
Question No. 20	General Comment 21 Reference (Article, Line)	A18, L1-4
	Question	What steps have been taken to provide initial and in-service basic training on child rights, child protection and the local context of children in street situations for all professionals who may come into direct or indirect contact with children in street situations, in such areas as policymaking, law enforcement, justice, education, health, social work and psychology?
	Contacted duty bearing institutions	- Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs - Ministry of Interior
	Summary of answers (provided by duty-bearing institutions)	The Ministry of Justice, through the work of the Judicial Academy, covers several thematic areas focused on the rights of the child, including juveniles as perpetrators and victims of criminal acts, and Family Law. Training for public prosecutors includes the protection of the rights of the child. Judges and public prosecutors have access to the HELP program on child-friendly justice, developed by the Council of Europe. Other duty bearing institutions did not respond.
	Comments	The Centre for Integration of Youth considers that none of the mentioned thematic areas directly refer to children in street situations.

Question No. 21	General Comment 21 Reference (Article, Line)	A18, L18-21
	Question	What steps have been taken to sensitize and train other stakeholders, such as transport workers, media representatives, community and spiritual/religious leaders and private sector actors, who come into contact with children in street situations?
	Contacted duty bearing institutions	<ul style="list-style-type: none"> - Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs - Ministry of Construction, Transport and Infrastructure - City of Belgrade, Directorate for Cooperation with Churches and Religious Communities - Ministry of Culture and Information / Sector for Information and Media
	Summary of answers (provided by duty-bearing institutions)	<p>The Ministry of Culture and Information stated that it participates in the work of state bodies and working groups whose work includes dealing with the topic of children in the street situation, as well as encouraging cultural and artistic creativity of socially vulnerable groups by financing and co-financing various projects. One such project is "SVI U GLASI", which was implemented by the "Art Aparat" association. The beneficiaries of the project were children in street situations who visit the Drop-In Shelter. In the field of public information, in 2021 the Ministry supported the implementation of four projects that deal with children in the street situation, one of which entirely focused on children in street situations and the conditions in which they live. The Ministry also highlighted the existence of legislation on the protection of children's rights within the public information system.</p> <p>Other duty bearing institutions did not respond.</p>
	Comments	As far as the Centre for Youth Integration is aware, no action has been taken to sensitize or train stakeholders outside the social protection system that come into contact with children in street situations.
Question No. 22	General Comment 21 Reference (Article, Line)	A19, L1-3
	Question	What action has been taken to ensure children in a street situation can access health and education services, justice, culture, sport and information?

Question No. 22	Contacted duty bearing institutions	<ul style="list-style-type: none"> - Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs - Ministry of Health - Ministry of Youth and Sports - Ministry of Justice - Ministry of Education, Science and Technological Development
	Summary of answers (provided by duty-bearing institutions)	<p>The Ministry of Justice, as with question number 6, stated that children in street situations are eligible for free legal aid, in accordance with the Law on Free Legal Aid, which came into force in 2019.</p> <p>Other duty bearing institutions did not respond.</p>
	Comments	<p>In the experience of the Centre for Youth Integration, free legal aid, as a service, very rarely reaches children in a street situation.</p> <p>Other duty bearing institutions, beyond the Ministry of Justice, should be actively supporting children in street situations to access services in their field of competences.</p>
Question No. 23	General Comment 21 Reference (Article, Line)	A19, 3-6
	Question	What action has been taken to provide specialized services on the street?
	Contacted duty bearing institutions	<ul style="list-style-type: none"> - Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs - Ministry of Justice
	Summary of answers (provided by duty-bearing institutions)	Duty bearing institutions did not respond.
	Comments	n/a
Question No. 24	General Comment 21 Reference (Article, Line)	A19, L9-11
	Question	What non-State services for children in a street situation are available and how are they supported by the State?

Question No. 24	Contacted duty bearing institutions	- Ministry of Human and Minority Rights and Social Dialogue - Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs
	Summary of answers (provided by duty-bearing institutions)	Duty bearing institutions did not respond.
	Comments	n/a
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Question No. 25	General Comment 21 Reference (Article, Line)	A20, L7-9
	Question	What steps have been taken to involve other stakeholders (businesses, academia) in order to leverage their capacities to contribute to policy formulation and service provision?
	Contacted duty bearing institutions	- Ministry of Human and Minority Rights and Social Dialogue - Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs - Council for Child Rights of the Government of Serbia - City of Belgrade
	Summary of answers (provided by duty-bearing institutions)	Duty bearing institutions did not respond.
Comments	n/a	
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Question No. 26	General Comment 21 Reference (Article, Line)	A30, L11-13
	Question	What steps have been taken to support children to participate in local, bottom-up planning processes?
	Contacted duty bearing institutions	- Ministry of Human and Minority Rights and Social Dialogue - Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs - Council for Child Rights of the Government of Serbia - City of Belgrade

Question No. 26	Summary of answers (provided by duty-bearing institutions)	Duty bearing institutions did not respond.
	Comments	n/a
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Question No. 27	General Comment 21 Reference (Article, Line)	A21, L1-2
	Question	What action has been taken to put in place monitoring and accountability mechanisms for the implementation of legislation, policies, and services?
	Contacted duty bearing institutions	- Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs - Council for Child Rights of the Government of Serbia - Ministry of Human and Minority Rights and Social Dialogue
	Summary of answers (provided by duty-bearing institutions)	The Council for Child Rights of the Government of Serbia stated that since 2014 it has monitored the implementation of United Nations recommendations for human rights. The Council stated that it has drafted a Plan to fulfil all the recommendations of the UN human rights mechanisms sent to the Republic of Serbia, which contains a total of 392 current recommendations, and provides information on their status, purpose and deadline, as well as the competent authorities in charge of their implementation. The Council states that in order to better monitor the implementation of all recommendations in all relevant departments, contact persons in charge of this work have been appointed.
Comments	The Centre for Youth Integration considers that the Council for Child Rights has not done enough to implement the UN recommendations on human rights. The available evidence indicates that almost no action has been taken to implement the guidance provided in General Comment 21.	
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The Centre for Youth Integration considers that a dedicated plan to implement the recommendations provided in General Comment 21 on the rights of children in street situations should be developed and implemented without delay.		
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Question No. 28	General Comment 21 Reference (Article, Line)	A21, L3-5
	Question	What action has been taken to involve children in monitoring and accountability mechanisms?

Question No. 28	Contacted duty bearing institutions	- Ministry of Human and Minority Rights and Social Dialogue
	Summary of answers (provided by duty-bearing institutions)	The Ministry of Human and Minority Rights and Social Dialogue states that when reporting to the UN Committee on the Rights of the Child on the implementation of the Convention on the Rights of the Child, the views and opinions of children on the implementation of the Convention on the Rights of the Child in Serbia are taken into account.
	Comments	The Centre for Youth Integration considers that such mechanisms do not reach children in street situations and that these children do not have the opportunity to express their views.
Question No. 29	General Comment 21 Reference (Article, Line)	A21, L6-8
	Question	What action has been taken to ensure independent human rights institutions are accessible to children in street-situations?
	Contacted duty bearing institutions	- Commissioner for the Protection of Equality - Protector of Citizens
	Summary of answers (provided by duty-bearing institutions)	The Protector of Citizens stated that it has a clear procedure for reporting situations in which any right of a certain person, including children, has been violated. The Office of the Protector of Citizens states that since its establishment, it has dealt with the issue of children in the street situations. The Protector of Citizen's stated that it attempted to sign a joint agreement on cooperation with Ministries regarding the adoption of strategies, action plans and measures for the prevention of children street situations and their full social inclusion; however, this agreement was not signed or implemented. As a significant contribution, the Protector of Citizens stated that a Panel of Young Advisors of the Protector of Citizens has been established, which provides a permanent means of including children in the work of the institution. In order to acquaint the members of the Panel with the life of children living and working on the street, the activity "Deca-deci i deca za decu" was implemented, when various workshops were held in Roma settlements, places where children work, and drop-in shelters in Belgrade, Novi Sad and Nis. Additionally, the Protector of Citizens produces brochures and leaflets with information about the powers and work of the Protector of Citizens, as well as ways to address the institution in case of violation of children's rights. Other duty bearing institutions did not respond.

Question No. 29	Comments	The Centre for Youth Integration considers that the Protector of Citizens should take a central role in drafting a national strategy in children in street situations. The Centre for Youth Integration notes that the procedure for reporting violations of human rights is the same for all citizens and that no special mechanisms or measures to ensure access for children in street situations have been put in place.
Question No. 30	General Comment 21 Reference (Article, Line)	A22, L1-2
	Question	What steps have been taken to ensure victims and survivors of human rights violations receive effective legal and other remedies?
	Contacted duty bearing institutions	- Ministry of Family Welfare and Demography - Ministry of Justice
	Summary of answers (provided by duty-bearing institutions)	The Ministry of Justice states that the National Strategy for Exercising the Rights of Victims and Witnesses of Criminal Offenses in the Republic of Serbia for the period 2022-2025 has been adopted, as well as the establishment of a national network of victim support services. This Strategy recognizes children as a particularly vulnerable group and envisages changes in criminal legislation to prevent secondary victimization of children. Other duty bearing institutions did not respond.
	Comments	n/a
Question No. 31	General Comment 21 Reference (Article, Line)	A22, L3-6
	Question	What complaints and judicial and non-judicial mechanisms (for violations of human rights) exist at local and national levels?
	Contacted duty bearing institutions	- Ministry of Human and Minority Rights and Social Dialogue
	Summary of answers (provided by duty-bearing institutions)	The Ministry of Human and Minority Rights and Social Dialogue summarized that judicial protection, constitutional judicial protection and the office the Protector of Citizens are the main protectors of human rights, as well as that the National Mechanism for the Prevention of Torture, which operates within the institution of the Protector of Citizens.

Question No. 31	Comments	The Centre for Youth Integration considers that these mechanisms do not reach children in street situations.
Question No. 32	General Comment 21 Reference (Article, Line)	A22, L6-7
	Question	What steps have been taken to ensure children in a street situation can access applicable international human rights mechanisms when domestic remedies have been exhausted?
	Contacted duty bearing institutions	- Ministry of Human and Minority Rights and Social Dialogue
	Summary of answers (provided by duty-bearing institutions)	The Ministry of Human and Minority Rights and Social Dialogue stated that the European Court of Human Rights is available in cases when domestic remedies have been exhausted and notes that Serbia has signed but not yet ratified the III Optional Protocol to the Convention on the Rights of the Child on communication procedures.
	Comments	The Centre for Youth Integration considers that there is no clear procedure for children in street situations to report human rights violations; despite experiencing continuous violations of the rights of the child and on-going failure of domestic institutions to provide remedy, to the best knowledge of the Centre for Youth Integration, no case related to rights violations of children in street situations in Serbia has been taken up by applicable international human rights mechanisms.
Question No. 33	General Comment 21 Reference (Article, Line)	A23, L2-3
	Question	What steps have been taken to put in place mechanisms to collect data and share disaggregated information about children in street situations?
	Contacted duty bearing institutions	- Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs - Council for Child Rights of the Government of Serbia - Republic Statistical Office - Republic institute for social protection
	Summary of answers (provided by duty-bearing institutions)	The Republic Institute for Social Protection states that data on children in the street situation are collected annually through individual reports of "Svratište" and "Prihvatište" services. Other duty bearing institutions did not respond.

Question No. 33	Comments	The Centre for Youth Integration notes that the "Svratište" and "Prihvatište" services are completely different services - each of which is equally important to the children for whom it is intended. Combining data from these two services is not appropriate.
		The Centre for Youth Integration considers that the lack of a definition of "children in street situations" is a serious problem that makes accurate monitoring or data collection impossible.
Question No. 34	General Comment 21 Reference (Article, Line)	A23, L10-11
	Question	How often is research on children in street situations?
	Contacted duty bearing institutions	- Ministry of Human and Minority Rights and Social Dialogue - Ministry of Family Welfare and Demography - Ministry of Labour, Employment, Veterans and Social Affairs - Council for Child Rights of the Government of Serbia
	Summary of answers (provided by duty-bearing institutions)	
	Comments	n/a

A case study of inaction

NOTE: The Ministry of Family Welfare and Demography did not provide answers to the specific questions requested from them. Instead, the Ministry provided a general reply, a summary of which is provided below.

Question No.	General Comment 21 Reference (Article, Line)
n/a	
Question	General answer to questions 3, 6-28 and 30-34 (see above)
Contacted duty bearing institutions	- Ministry of Human and Minority Rights and Social Dialogue
Summary of answers (provided by duty-bearing institutions)	<p>The Ministry of Family Welfare and Demography invited the Government of the Republic of Serbia to form a working group to monitor the Strategy for Prevention and Protection of Children from Violence.</p> <p>The Ministry of Family Welfare and Demography has not taken special measures to protect children in the street situation, and states that the guardianship authorities are still acting according to the Instruction of the Ministry of Labour, Employment, Veterans and Social Affairs, which is not in accordance with the standards prescribed in Convention on the Rights of the Child and the General Commentary 21. The Ministry states that instruction on guardianship the centres for social work to cooperate with the relevant institutions and to form teams in the field, which has been realized in practice.</p> <p>The Ministry concluded by, stating that it is not expedient to participate in the research by answering the Questionnaire.</p>
Comments	n/a



11.2. Summary of input from public institutions working directly with children in street situations

Question No.	Duty bearing institution	City Centre for Social Work of Belgrade
1	Summary of input	The City Centre for Social Work of Belgrade stated that it was familiar with the General Comment No. 21 of the UN Committee on the Rights of the Child, but that the employees of the institution have not undergone training on the application of the guidance provided in the Comment. The City Centre for Social Work stated that employees have undergone training related to working with children in a street situation. The City Centre for Social Work collects data on children in the street situation, but stated that there is no precise data on how many such children there are in the City of Belgrade; they stated that in 2020 they recorded 16 children in street situations. The City Centre for Social Work stated that it provides services intended exclusively for children in street situations living in the territory of the City of Belgrade, namely assessment and planning services. They also stated that, in regard their beneficiaries, the City Centre for Social Work cooperates with other public services, especially education, health care, police, prosecutor's office and social protection institutions, as well as with non-governmental organizations.
	Comment	The Centre for Integration of Youth has no knowledge of the existence of accredited training on working with children in street situations in Serbia. It is assumed that the training for staff about children in a street situation, referred to by the City Centre for Social Work, is part of more general training, and not a specific training that focuses only on this group of children. Determining the exact number of children in street situations is challenging, with significant variations in estimations. There is a wide difference between the number of children in street situations in the records of the City Centre for Social Work of Belgrade (16 such children recorded in 2020) and the number of cases reported by the Drop-in Shelter service operated by the Centre for Youth Integration.

Question No.	Duty bearing institution	Drop-in Shelter for Children and Youth of the City of Novi Sad
2	Summary of input	Summary answer: The Drop-In Shelter for Children and Youth of the City of Novi Sad, which is operated by the City of Novi Sad, is a service that is exclusively intended for children in street situations in the territory of the city of Novi Sad, and in a small number of cases children who come from other territories. The Drop-In Shelter in Novi Sad stated that some of their staff are thoroughly acquainted with General Comment No. 21, but that no training has been organized on the application of the Comment. At the time of writing, the Drop-in Shelter in Novi Sad stated the service was being used by 418 children in street situations. The services provided by the Shelter include: a safe space, maintaining personal hygiene, nutrition, distribution of clothing and footwear, psychosocial support, mediation in connecting with other institutions, support and assistance in schooling and medical interventions. The Shelter stated that they are cooperating with the Centre for Social Work of the City of Novi Sad, which assesses if and what type of additional services are needed. The Drop-In Shelter in Novi Sad does not conduct outreach work in the community. Outreach work is instead carried out by the case managers of the Centre for Social Work of the City of Novi Sad, who, if they deem it necessary, refers children to the Drop-In Shelter service.
	Comment	

11.3. Summary of input from CSOs working with children (MODS members)

Location 1 - Pozarevac		
Are you familiar with General Comment No. 21 of the UN Committee on the Rights of the Child? If yes, can you list the actions taken by the Serbian state or official institutions to implement it?	Are there children in street situations in your community?	In your opinion, what are the main reasons why children are in a street situation?
No	No	Poverty, failure of parental care.
In your opinion, what percentage of children in street situations is exploited or are victims of human trafficking?	Are there services in your community designed exclusively for street children? If so, list them.	Do you come into contact with children in a street situation in your work? If so, how many do you work with annually?
We do not know.	We do not know.	No
Do you provide specialized services or activities intended exclusively for children in a street situation?	Do you cooperate with any organization or institution that provides services or activities intended exclusively for children in a street situation? If yes, specify with which.	According to your assessment, how many children are in the street situation on the territory of the Republic of Serbia?
No	No	About 2,000 children
Location 2 - Pozarevac		
Are you familiar with General Comment No. 21 of the UN Committee on the Rights of the Child? If yes, can you list the actions taken by the Serbian state or official institutions to implement it?	Are there children in street situations in your community?	In your opinion, what are the main reasons why children are in a street situation?
I think General Comment 21 is about child adoption. I am not familiar with the actions of the state.	No	Neglected by or without parental care
In your opinion, what percentage of children in street situations is exploited or are victims of human trafficking?	Are there services in your community designed exclusively for street children? If so, list them.	Do you come into contact with children in a street situation in your work? If so, how many do you work with annually?
We do not know.	We do not know.	No
Do you provide specialized services or activities intended exclusively for children in a street situation?	Do you cooperate with any organization or institution that provides services or activities intended exclusively for children in a street situation? If yes, specify with which.	According to your assessment, how many children are in the street situation on the territory of the Republic of Serbia?
No	No	No answer

Location 3 - National (Kraljevo, Belgrade)		
Are you familiar with General Comment No. 21 of the UN Committee on the Rights of the Child? If yes, can you list the actions taken by the Serbian state or official institutions to implement it?	Are there children in street situations in your community?	In your opinion, what are the main reasons why children are in a street situation?
We are familiar with General Comment No. 21. It seems to me that the only thing that has changed is that the terminology has changed and that the term "children in street situations" is used. I am not sure how the implementation is done at the local level and whether the Centres for Social Work have formed mobile teams to support these children, but it seems to me that the strategic framework, such as the Draft Social Protection Strategy, does not recognize these children and their specific situation. Moreover, the Draft does not recognize them as children in a street situation, but mentions child victims of begging.	Yes	The reasons are multiple. First of all, we think it is the dysfunction of the family and the presence of various forms of violence. In addition, poverty practically "forces" children to cope in different ways in a street environment where they often become victims of violence and exploitation again.
In your opinion, what percentage of children in street situations is exploited or are victims of human trafficking?	Are there services in your community designed exclusively for street children? If so, list them.	Do you come into contact with children in a street situation in your work? If so, how many do you work with annually?
Of the total number of children, we believe that at least 70% are exploited.	Belgrade and Novi Sad have drop-in shelters for children in street situations, which are the only services that target children in the street situation.	Yes, children in street situations come to the Children's Village Kraljevo for accommodation. And we work with young people who, after leaving the alternative care system, have nowhere to go and "end up on the street".
Do you provide specialized services or activities intended exclusively for children in a street situation?	Do you cooperate with any organization or institution that provides services or activities intended exclusively for children in a street situation? If yes, specify with which.	According to your assessment, how many children are in the street situation on the territory of the Republic of Serbia?
No	No	About 2,000 children

Location 4 - Belgrade		
Are you familiar with General Comment No. 21 of the UN Committee on the Rights of the Child? If yes, can you list the actions taken by the Serbian state or official institutions to implement it?	Are there children in street situations in your community?	In your opinion, what are the main reasons why children are in a street situation?
Apart from the terminological change and the formation of mobile teams at the centre for social work, nothing concrete has been done, and clearer statistics on children in the street situation have not been collected.	Yes	Poverty, given that most often it is Roma children, as well as social exclusion.
In your opinion, what percentage of children in street situations is exploited or are victims of human trafficking?	Are there services in your community designed exclusively for street children? If so, list them.	Do you come into contact with children in a street situation in your work? If so, how many do you work with annually?
We doubt there are clear statistics.	Yes - the drop-in shelter for children in Belgrade. There should be a drop-in shelter for Children in Belgrade operated by the city, but I don't know if it was established.	Yes, mostly indirectly.
Do you provide specialized services or activities intended exclusively for children in a street situation?	Do you cooperate with any organization or institution that provides services or activities intended exclusively for children in a street situation? If yes, specify with which.	According to your assessment, how many children are in the street situation on the territory of the Republic of Serbia?
Yes	Drop-in shelter for children Belgrade. Drop-in shelter for children and youth of the city of Novi Sad.	Minimum 2,000 children
Location 5 - Belgrade		
Are you familiar with General Comment No. 21 of the UN Committee on the Rights of the Child? If yes, can you list the actions taken by the Serbian state or official institutions to implement it?	Are there children in street situations in your community?	In your opinion, what are the main reasons why children are in a street situation?
We are familiar with General Comment 21	Yes	Poverty
In your opinion, what percentage of children in street situations is exploited or are victims of human trafficking?	Are there services in your community designed exclusively for street children? If so, list them.	Do you come into contact with children in a street situation in your work? If so, how many do you work with annually?
No answer	No answer	No

Location 5 - Belgrade		
Do you provide specialized services or activities intended exclusively for children in a street situation?	Do you cooperate with any organization or institution that provides services or activities intended exclusively for children in a street situation? If yes, specify with which.	According to your assessment, how many children are in the street situation on the territory of the Republic of Serbia?
No	Centre for Youth Integration	About 2,000 children
Location 6 - Belgrade		
Are you familiar with General Comment No. 21 of the UN Committee on the Rights of the Child? If yes, can you list the actions taken by the Serbian state or official institutions to implement it?	Are there children in street situations in your community?	In your opinion, what are the main reasons why children are in a street situation?
We are not familiar enough with General Comment 21	Yes	Poverty, lack of education, inability to access information that can help them.
In your opinion, what percentage of children in street situations is exploited or are victims of human trafficking?	Are there services in your community designed exclusively for street children? If so, list them.	Do you come into contact with children in a street situation in your work? If so, how many do you work with annually?
60%	I am not familiar with any.	We come into contact with a small number of children in street situations, say 20 or so.
Do you provide specialized services or activities intended exclusively for children in a street situation?	Do you cooperate with any organization or institution that provides services or activities intended exclusively for children in a street situation? If yes, specify with which.	According to your assessment, how many children are in the street situation on the territory of the Republic of Serbia?
No	No	About 10,000.
Location 7 - Kosjerić		
Are you familiar with General Comment No. 21 of the UN Committee on the Rights of the Child? If yes, can you list the actions taken by the Serbian state or official institutions to implement it?	Are there children in street situations in your community?	In your opinion, what are the main reasons why children are in a street situation?
Yes, we are familiar with General Comment 21. We do not know what actions the state has taken, (i.e. we are not sure if it has taken any action at all).	No	Poverty, inadequate response of social protection systems and other systems,

Location 7 - Kosjerić		
In your opinion, what percentage of children in street situations is exploited or are victims of human trafficking?	Are there services in your community designed exclusively for street children? If so, list them.	Do you come into contact with children in a street situation in your work? If so, how many do you work with annually?
The vast majority are exploited	No	No
Do you provide specialized services or activities intended exclusively for children in a street situation?	Do you cooperate with any organization or institution that provides services or activities intended exclusively for children in a street situation? If yes, specify with which.	According to your assessment, how many children are in the street situation on the territory of the Republic of Serbia?
No	Previously we cooperated with the ecumenical humanitarian organization Novi Sad	About 5000-6000 children
Location 8 - Cicevac		
Are you familiar with General Comment No. 21 of the UN Committee on the Rights of the Child? If yes, can you list the actions taken by the Serbian state or official institutions to implement it?	Are there children in street situations in your community?	In your opinion, what are the main reasons why children are in a street situation?
Yes, but I am not familiar with the actions of the state.	Yes	Poor financial situation of the family in which they live, domestic violence, certainly related to the dysfunction of the family in which they live.
In your opinion, what percentage of children in street situations is exploited or are victims of human trafficking?	Are there services in your community designed exclusively for street children? If so, list them.	Do you come into contact with children in a street situation in your work? If so, how many do you work with annually?
30%	No	We previously came into contact with children in street situations, but not recently, because there are fewer and fewer of them.
Do you provide specialized services or activities intended exclusively for children in a street situation?	Do you cooperate with any organization or institution that provides services or activities intended exclusively for children in a street situation? If yes, specify with which.	According to your assessment, how many children are in the street situation on the territory of the Republic of Serbia?
No	No	5000

Location 9 - Uzice		
Are you familiar with General Comment No. 21 of the UN Committee on the Rights of the Child? If yes, can you list the actions taken by the Serbian state or official institutions to implement it?	Are there children in street situations in your community?	In your opinion, what are the main reasons why children are in a street situation?
Yes, comment 21 refers to street children and their position, but I am not sure what has been done by the state and institutions to solve the problem of street children.	Yes	There are various reasons, some because of poverty, some because of the invisibility to institutions, some because the state is not doing enough to get children off the streets.
In your opinion, what percentage of children in street situations is exploited or are victims of human trafficking?	Are there services in your community designed exclusively for street children? If so, list them.	Do you come into contact with children in a street situation in your work? If so, how many do you work with annually?
We think that a large number of children that have been exploited and some are also victims of child trafficking.	There are no children in street situations in our city. Some families with children in street situations are beneficiaries of our services. But, in our city, there is no clearly defined services for these children (such as drop-in shelters)	No, we do not come into contact with street children through our work.
Do you provide specialized services or activities intended exclusively for children in a street situation?	Do you cooperate with any organization or institution that provides services or activities intended exclusively for children in a street situation? If yes, specify with which.	According to your assessment, how many children are in the street situation on the territory of the Republic of Serbia?
No	No	We do not know the exact number.

Location 10 - Novi Sad		
Are you familiar with General Comment No. 21 of the UN Committee on the Rights of the Child? If yes, can you list the actions taken by the Serbian state or official institutions to implement it?	Are there children in street situations in your community?	In your opinion, what are the main reasons why children are in a street situation?
We are familiar in principle with General Comment 21, considering that we deal with support for children from the Roma national community. However, we have no insight into what has been done. We know that the National Strategy for Social Inclusion of Roma Men and Women in the Republic of Serbia for the period 2016-2025 recognizes children in the street situation and in the Action Plan for 2017-2018 you can see the activities that are brought to this target group. Given that there is no report on monitoring and implementation of activities and measures from this action plan and that the Revised Strategy for Social Inclusion of Roma in the Republic of Serbia for the period 2022-2030 is being finalized, we believe that it is generally necessary to insist on establishing functional mechanisms for monitoring, in order to collect data and gain a picture of the real situation, especially at the local level.	Yes	Lack of support in the community for families where parents have low parenting competencies, poor socio-economic status and various other problems due to which children are neglected. Local governments do not sufficiently recognize this group of children as a group in need of support and do not allocate enough funds for services to support families.
Do you provide specialized services or activities intended exclusively for children in a street situation?		
No		

Location 10 - Novi Sad		
In your opinion, what percentage of children in street situations is exploited or are victims of human trafficking?	Are there services in your community designed exclusively for street children? If so, list them.	Do you come into contact with children in a street situation in your work? If so, how many do you work with annually?
We do not know.	There is a drop-in shelter for children and youth living and working on the streets run by a social work centre. The drop-in shelter is financed from the budget of the City of Novi Sad. However, this service is not sufficient in response to the needs of these children given the large number of children who are on the street situation. Several civil society organizations work with children in informal settlements, but we do not know if they target children in street situations.	Yes, considering that since 2013 we have been implementing a program of field support to families in informal settlements inhabited primarily by members of the Roma national minority. However, our program is aimed at supporting the early development and inclusion of children in the system of preschool education and we do not have activities that are aimed at children in the street situation. Through cooperation with 9 primary schools in Novi Sad, we have provided support in the formation and work of school teams for the prevention of dropouts from the education system; among children who receive support from these teams (in coordinated cooperation with the Centre for Social Work) are children in street situations. Unfortunately, we did not collect data on how many there were.
Do you cooperate with any organization or institution that provides services or activities intended exclusively for children in a street situation? If yes, specify with which.		According to your assessment, how many children are in the street situation on the territory of the Republic of Serbia?
	Centre for Social Work of the City of Novi Sad	We do not know.

Location 11 - Pozarevac		
Are you familiar with General Comment No. 21 of the UN Committee on the Rights of the Child? If yes, can you list the actions taken by the Serbian state or official institutions to implement it?	Are there children in street situations in your community?	In your opinion, what are the main reasons why children are in a street situation?
We have read General Comment 21 (2017) on children in a street situation. But we are not familiar enough.	No	Poverty, rejection of family.

Location 11 - Pozarevac		
In your opinion, what percentage of children in street situations is exploited or are victims of human trafficking? <i>Most children who find themselves in street situations/</i>	Are there services in your community designed exclusively for street children? If so, list them. <i>We do not know.</i>	Do you come into contact with children in a street situation in your work? If so, how many do you work with annually? <i>We have not come into contact with them; only children who beg with their parents, but have family accommodation.</i>
Do you provide specialized services or activities intended exclusively for children in a street situation? <i>No</i>	Do you cooperate with any organization or institution that provides services or activities intended exclusively for children in a street situation? If yes, specify with which. <i>No</i>	According to your assessment, how many children are in the street situation on the territory of the Republic of Serbia? <i>We have information that there are about 1,500 children a year using the drop-in shelter, and about 70 children visit per day. We do not know if this is from the entire territory of Serbia or only Belgrade.</i>
Location 12 - Arandjelovac		
Are you familiar with General Comment No. 21 of the UN Committee on the Rights of the Child? If yes, can you list the actions taken by the Serbian state or official institutions to implement it? <i>115 mobile teams have been formed at social work centres in Serbia.</i>	Are there children in street situations in your community? <i>No</i>	In your opinion, what are the main reasons why children are in a street situation? <i>Parental unemployment and poverty.</i>
In your opinion, what percentage of children in street situations is exploited or are victims of human trafficking? <i>35%</i>	Are there services in your community designed exclusively for street children? If so, list them. <i>No</i>	Do you come into contact with children in a street situation in your work? If so, how many do you work with annually? <i>No</i>
Do you provide specialized services or activities intended exclusively for children in a street situation? <i>No</i>	Do you cooperate with any organization or institution that provides services or activities intended exclusively for children in a street situation? If yes, specify with which. <i>Within the Network of Children's Organizations of Serbia (MODS)</i>	According to your assessment, how many children are in the street situation on the territory of the Republic of Serbia? <i>3000</i>

Location 13 - Kragujevac		
Are you familiar with General Comment No. 21 of the UN Committee on the Rights of the Child? If yes, can you list the actions taken by the Serbian state or official institutions to implement it? <i>Yes. The biggest actions are related to the work of social workers, judiciary, police and educational institutions and the creation of a network for data exchange.</i>	Are there children in street situations in your community? <i>Yes</i>	In your opinion, what are the main reasons why children are in a street situation? <i>Poverty, insufficient parental care and children from broken families; parents that use violent methods / domestic violence.</i>
In your opinion, what percentage of children in street situations is exploited or are victims of human trafficking? <i>A large percentage. They are all potentially in danger.</i>	Are there services in your community designed exclusively for street children? If so, list them. <i>They do not exist or are not known to us.</i>	Do you come into contact with children in a street situation in your work? If so, how many do you work with annually? <i>Yes. Several families. It depends on information given to us by educational institutions due to children not going to school.</i>
Do you provide specialized services or activities intended exclusively for children in a street situation? <i>No</i>	Do you cooperate with any organization or institution that provides services or activities intended exclusively for children in a street situation? If yes, specify with which. <i>Yes. Centre for social work, counselling for parents, Red Cross.</i>	According to your assessment, how many children are in the street situation on the territory of the Republic of Serbia? <i>We do not know. That question requires us to give estimates without any serious criteria.</i>

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