

Contribution of the Network of Organizations for Children of Serbia (MODS) to the 2026 Serbia Annual Report

Area: Rights of the child

The reporting period has been marked by stagnation and backsliding in certain areas, with a pronounced gap between the legislative framework and its implementation. There has been a deterioration in the conditions for child and youth participation, weaknesses in protection within the educational, digital, and media environments, as well as serious concerns regarding institutional accountability and regulatory oversight.

Legal uncertainty and the selective application of protective mechanisms and access to justice in cases of police violence against children and young people, coupled with the lack of response from competent prosecution offices, are deeply concerning.

Of particular concern are the underdeveloped preventive and supportive services for children and families, weak inter-sectoral cooperation, limited access to mental health services, and inconsistent protection of children from violence, as well as a worsening environment for civil society organizations. Children from vulnerable groups—especially Roma children, children with disabilities, children living in poverty, children in street situations, and children in alternative care—continue to be disproportionately affected by systemic weaknesses.

1. Introduction

The Network of Organizations for Children of Serbia (MODS) submits this contribution as part of the consultations for the preparation of the European Commission's 2026 Serbia Country Report. This document is based on contributions from MODS member organizations active in the field of protection and promotion of children's rights, including: Friends of Children of Serbia, Užice Child Rights Centre (UCRC), Centre for Youth Integration (CIM), Psychosocial Innovation Network (PIN), Libero, Union of Secondary School Students of Serbia (UNSS), Center for Children and Youth, Praxis, Western Balkans Institute – Tutoring Program, Organization for Creative Gathering (OKO), PAAD, and other organizations.

The analysis covers the period starting from 1 September 2025 and focuses on the legislative and strategic framework, its practical implementation, the functioning of institutions, the position of children from vulnerable groups, and the realization of children's rights in education, social protection, mental health, participation, media, and the digital environment, as well as the working conditions for civil society organizations.

2. General Assessment of Progress

The reporting period has been marked by stagnation and backsliding in the field of children's rights. Although certain regulations exist or are under preparation, progress has remained largely confined to formal frameworks, without corresponding results in the day-to-day realization of children's rights.

The primary reasons for this assessment lie in the failure to meet the goals and indicators related to children's rights within the Reform Agenda (Growth Plan) under the pillars of Human Capital and Fundamental Rights. Furthermore, there is an active erosion of existing standards, politicization of institutions, a lack of continuity in strategic planning, and insufficient consideration of recommendations from civil society organizations, experts, and children themselves.

The identified problems consist of several interconnected dimensions: weak capacities in the social protection, education, and mental health systems; inconsistent and often reactive conduct by institutions; the absence of a comprehensive strategic framework for children's rights; a deteriorating environment for civil society; formalized or weakened mechanisms for child and youth participation; and increasingly visible risks in the media and digital space.

It is particularly concerning that the protection of children's rights in the media and digital environment has emerged as a cross-cutting issue. The way children are represented in the media, the spread of digital violence, weak privacy protection, and ineffective regulatory oversight create additional risks to children's safety, dignity, and development.

In 2025, instances of police violence against children and youth were recorded in the context of exercising the civil freedom of assembly. There is a clear asymmetry in the response of the police and the prosecution regarding the processing of children and youth—specifically, high efficiency in initiating proceedings against them in the context of civic protests, contrasted with a complete lack of response when children and youth are victims of police violence or attacks by regime supporters. A glaring example is the **Basic Public Prosecutor's Office** in Valjevo, which has failed to act for eight months on criminal complaints regarding police abuse of children and youth in Valjevo on 14 August 2025. This is despite the fact that such proceedings are subject to the **Methodology for Investigating Cases of Abuse by the Police**, which mandates that such investigations must be conducted with urgency and efficiency.¹

3. Key Recommendations

1. **Adopt and implement a comprehensive strategic framework for children's rights**, including clear indicators, budgetary support, and mandatory monitoring of implementation.
2. **Conduct urgent and independent investigations** into all cases where children and youth were victims of police abuse, and call upon public prosecutor's offices to act without further delay. This is essential to achieve legal certainty and to end the selective application of the law and the asymmetry in the conduct of state authorities.

¹ <https://www.pars.rs/public/Dokumenti/Publikacije/1163/metodologija-za-sprovođenje-istrage-u-slučajevima-zlostavljanja-od-strane-policije.pdf>

3. **Strengthen institutional accountability and inter-sectoral cooperation.** It is necessary to establish effective accountability mechanisms for schools, social work centers, healthcare institutions, the police, and prosecution offices, supported by clear cooperation protocols, oversight of conduct, and sanctioning of professional failures. Particular emphasis should be placed on improving timely responses to cases of violence, neglect, and violations of children's rights.
4. **Develop community-based preventive services and strengthen the mental health system.** Standardized and sustainably funded preventive, socio-educational, and counseling-therapeutic services for children and families are required. Additionally, the accessibility of mental health services for children and youth must be significantly improved by strengthening school professional services, increasing the number of psychologists and child psychiatrists, and developing local support services.
5. **Enhance inclusive education and the protection of the most vulnerable children.** It is imperative to prevent the segregation and discrimination of Roma children, children with disabilities, children in street situations, and children in alternative care. This should be achieved through equal access to quality education, the availability of personal assistants and pedagogical assistants, and stable funding for community support services.
6. **Ensure meaningful participation of children and youth.** Efforts must be made to ensure that the participation of children and youth in decision-making does not remain merely formal. This includes functional student parliaments, local youth councils, feedback mechanisms, and the protection of children's and young people's freedom of expression, assembly, and public action.
7. **Ensure the protection of children's rights in educational, media, and digital environments.** Measures introduced in the name of security, including biometric surveillance and restrictive bans in schools, must comply with the standards of privacy, proportionality, and the best interests of the child. Simultaneously, protection against digital violence must be strengthened (**aligned with the EU Strategy on the Rights of the Child and the Digital Services Act**), as well as protection against sensationalism, privacy violations, and harmful media content.
8. **Strengthen independent oversight and the space for civil society.** Ensure a transparent and credible selection of members for the REM Council (Regulatory Authority for Electronic Media), strengthen the independence of regulatory bodies, and provide fair and depoliticized funding for civil society organizations, ensuring their substantive involvement in the creation and monitoring of public policies in the field of children's rights.

4. Reform Agenda and EU's Growth Plan for the Western Balkans

In October 2024, the Government of Serbia adopted Reform Agenda, a strategic document aimed at accelerating ongoing reforms aligned with Serbia's EU accession negotiations. Developed in collaboration with 37 Serbian institutions and the European Commission, the agenda responds to the EU's Growth Plan for the Western Balkans, providing a framework for faster integration into the EU single market.

The Reform Agenda outlines key policy measures to accelerate EU-related reforms, including in the areas of Human Capital and Fundamental Rights. These reforms aim to improve education, skills development, and social inclusion, particularly for vulnerable groups.

MODS monitored the implementation of the Reform Agenda in two critical areas:

1. **Human Capital** – Enhancing the quality, equity, and accessibility of education at all levels.
2. **Fundamental Rights** – Strengthening the protection of vulnerable individuals and national minorities, with a focus on deinstitutionalization and the development of community-based social services.

MODS tracked the following indicators aligned with the Reform Agenda and relevant for promoting children's rights and social inclusion:

Human Capital (Education and Skills Development)

1. Participation of at least **38%** of children aged 6 months to 3 years in preschool education (by June 2026, which is envisaged taking into account an ambitious but realistic growth rate);

According to the latest available data from the Statistical Office of the Republic of Serbia, in the 2025/2026 school year, the total number of children attending pre-school education and care was 235,319, of whom 48.5% (114,148) were girls and 51.5% (121,171) were boys.

The total number of children aged six months to three years was 59,902, **representing 25.5%,² whereas the Reform Agenda stipulates a target indicator of 38%.**

Considering the age structure within this category, the largest number of children of both sexes are between two and three years of age.³

2. Include at least 80% of children aged 3 to 5.5 years in preschool education (by June 2026, which is envisaged taking into account an ambitious but realistic growth rate);

The number of children aged three years until enrolment in primary school who attended pre-school education in the same year amounted to 175,417, or **74.5%, indicating that the coverage envisaged by the Reform Agenda (80%) has not been achieved in this segment either.**

The pre-school education and care program is organized within 508 pre-school institutions (197 public and 311 private), with the highest proportion of children (over 87%) attending public/state institutions.⁴

Fundamental Rights (Child Protection and Inclusion)

1. The Law on Juvenile Offenders of Criminal Offenses and Criminal Protection of Minors shall be adopted by the end of 2025.
2. The Law on the Prevention of Domestic Violence will be passed by the end of 2025

Although the Reform Agenda, in the area of improving fundamental rights related to child protection and inclusion, envisaged the drafting of a new Law on Juvenile Offenders and the Criminal Protection of Minors—specifically with regard to reviewing the types and system of criminal sanctions applicable to minors, as well as introducing special obligations and new educational measures—the Republic of Serbia **has not made substantive reform progress in this field.**

² Republički zavod za statistiku, *Predškolsko obrazovanje i vaspitanje 2026*, available at <https://publikacije.stat.gov.rs/G2026/Html/G20261104.html> accessed on 28.04.2026.

³ Republički zavod za statistiku, *Broj dece u predškolskom vaspitanju i obrazovanju prema uzrastu i polu*, available at <https://data.stat.gov.rs/Home/Result/11010309?languageCode=sr-Cyrl> accessed on 28.04. 2026. godine.

⁴ Republički zavod za statistiku, *Predškolsko obrazovanje i vaspitanje 2026*, available at <https://publikacije.stat.gov.rs/G2026/Html/G20261104.html> accessed on 28.04.2026.

On the website of the Ministry of Justice, under the public consultations section (<https://mpravde.gov.rs/javne-rasprave-1>), a draft Law on Juvenile Offenders and the Protection of Minors in Criminal Proceedings can be found, for which a public consultation period was scheduled from 10 September to 1 October 2025. Additionally, the same website contains a draft proposal for amendments to the Law on the Prevention of Domestic Violence, along with information indicating that the public consultation period was scheduled from 12 November to 2 December 2025. However, both draft laws and the related calls for public consultation lack sufficient clarity and transparency, as relevant stakeholders were not adequately informed about the draft texts nor formally invited to participate in consultations, or to submit comments and suggestions. Pursuant to the Law on the Planning System, the competent ministry was obliged to issue, through the Ministry for Human and Minority Rights and Social Dialogue, a public call inviting civil society organizations to apply for participation in working groups established for the drafting of amendments to the aforementioned laws. No such call has been published on the website of the Ministry for Human and Minority Rights and Social Dialogue. Furthermore, no public invitation was issued to the wider public to participate via the e-Consultations platform by submitting comments on the proposed amendments, nor to take part in the public consultation process.

In this regard, it may be concluded that the indicators set out in the Reform Agenda, relating to the adoption of amendments to the Law on Juvenile Offenders and the Protection of Minors in Criminal Proceedings, as well as the Law on the Prevention of Domestic Violence, have not been fulfilled.

3. Family law

The Reform Agenda also envisaged the adoption of amendments to the Family Law, including the abolition of child marriages and the enhancement of protection against domestic violence. **Unlike the previously mentioned legislation, at the time of drafting this report, the process of amending the Family Law is underway and is being conducted in accordance with the Law on the Planning System, with particular emphasis placed on the prohibition of corporal punishment of children. Some of the proposed changes include the abolition of child marriages, as well as the elimination of the legal institution of full deprivation of legal capacity.** Although these amendments to the Family Law have not yet been adopted, progress in this area has been observed.

4. Action Plan for the Implementation of the Deinstitutionalization Strategy

A key document intended to support the realization of the right to community-based living for beneficiaries of social protection, through processes of deinstitutionalization and social inclusion, is **the Action Plan for the Implementation of the Strategy on Deinstitutionalization and the Development of Community-Based Social Protection Services for the period 2022–2026, adopted for the period 2025–2026 and published in the Official Gazette of the Republic of Serbia on 5 December 2025.**

The introductory section of the Action Plan for 2025–2026, within the framework of the aforementioned Strategy, states that the key results achieved during the previous period include: evident progress in the development of community-based services that support individuals in remaining within their families for as

long as possible; a continuous upward trend in the total number of licensed community-based service providers over recent years; and the establishment of a pluralistic service provision system, now predominantly composed of providers from the non-public sector, as opposed to the previously prevailing public-sector dominance. The introductory section further notes that such services are delivered in over 90% of municipalities, with a more balanced territorial distribution across districts compared to earlier periods.⁵

5. Increase the number of users of community services provided by licensed service providers by 18%

The most recent available reports of the Republic Institute for Social Protection from 2024 indicate that a slowdown in the service licensing process has had a direct impact on the number of service users, which decreased by 10% in 2024 compared to 2023. Consequently, this indicator has not been achieved as envisaged by the Reform Agenda.

When observed over a longer period, from 2016 onwards, trends in the number of service users do not appear to correlate with the number of service providers. Specifically, while the number of providers has steadily increased between 2016 and 2024, the number of users has fluctuated. In 2024, the total number of users of services provided by licensed providers at the local level amounted to 21,448, with a higher representation of women (59.4%) compared to men (40.6%). Continuously, the largest proportion of users has been recorded in the home assistance service (58.8%), followed by the personal assistant service for children, which was used by a total of 4,221 children. By contrast, the combined share of users of all other services amounts to only 21.5%.⁶

5. Legislative and Strategic Framework

In the reporting period, there has been no significant improvement in the legislative and strategic framework regarding children's rights. The core problem lies not only in the absence of new or enhanced policies but also in the **lack of continuity in strategic planning**, monitoring, and evaluation of existing commitments.

For more than a decade, Serbia has lacked a valid and comprehensive strategic document in the field of children's rights: the National Action Plan for Children expired in 2015, and the Strategy for the Prevention and Protection of Children from Violence expired in 2023. A new strategy has yet to be adopted, nor has a publicly available report on the implementation of the previous strategy been developed. The absence of a strategic direction **weakens institutional accountability**, hinders the development of community-based services, and slows down the reform of the child protection system.

The processes for drafting and amending regulations in the field of education also remain problematic. During the preparation of the **Action Plan for the implementation of the Education Strategy until 2030**,

⁵ Pravno informacioni sistem, *Akcioni plan za period 2025 – 2026. godine za sprovođenje Strategije deinstitutionalizacije i razvoja usluga socijalne zaštite u zajednici za period 2022 – 2026. godine*, available at <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/drugiakt/2025/110/1> accessed on 28.04.2026.

⁶ Republički zavod za socijalnu zaštitu, *Izveštaj o uslugama socijalne zaštite na lokalnom nivou koje pružaju licencirani pružaoci usluga u 2024. godini*, available at <https://www.zavodsz.gov.rs/media/3122/izveštaj-o-uslugama-socijalne-zaštite-na-lokalnom-nivou-koje-pruzaju-lplu-2024.pdf> accessed on 28.04.2026.

proposals concerning accessibility, equity, and quality of education—including issues such as the insufficient number of pedagogical assistants and the lack of clear indicators for monitoring student progress—were not taken into account⁷.

In this context, amendments to the **Law on Textbooks**⁸ and other educational regulations further point to a formalistic approach and the absence of meaningful involvement of children and youth in decision-making processes and the consideration of their views and opinions.

6. Judiciary and Fundamental Rights (Chapter 23)

During the reporting period, serious concerns have been raised regarding the protection of the **civil and political rights of children**, as well as broader weaknesses in the functioning of the protection system. A particular challenge is the conduct of the police, prosecution, and educational institutions in situations where children and youth participated in protests or other forms of public expression of opinion.

Cases of **police violence and abuse of children** have been recorded, including the detention of minors without full protection of their **procedural rights**. Specifically, there were instances where children and youth were detained without the presence of a parent or a lawyer. Furthermore, there has been a notable **lack of response from the public prosecution** (for example, the Basic Public Prosecutor's Office in Valjevo) regarding criminal complaints for police abuse of children and youth in Valjevo on 14 August 2025. Inadequate institutional reactions were observed, alongside the absence of an effective, timely, and consistent institutional response to allegations of misconduct towards children.⁹

Of particular concern is the **failure to prosecute** allegations of police violence against children, as well as the further **shrinking space** for freedom of speech, assembly, and child participation within the context of the ongoing socio-political crisis. Children and youth who participate in public assemblies are exposed to an increased risk of institutional pressure, as well as **public targeting** and **media lynching**.¹⁰

Legal protection mechanisms remain slow, inefficient, and insufficiently **child-sensitive**. In cases of violence, neglect, or institutional failure, reports are often not resolved in a timely manner, while sanctions are rare or lack a **deterrent effect**.

Child and Youth Participation

In the reporting period, opportunities for children and youth to participate in decision-making processes that affect them remain limited, with no visible substantive progress. Although formal participation mechanisms exist, their practical application often fails to enable a real impact on decision-making processes.

⁷ <https://www.srednjiskolci.org.rs/doprinos-akcionom-planu-za-sprovođenje-strategije-obrazovanja-u-2027/>

⁸ <https://www.srednjiskolci.org.rs/kriticki-osvrt-na-nacrt-zakona-o-izmenama-i-dopunama-zakona-o-udžbenicima-2025/>

⁹ https://zadecu.org/wp-content/uploads/2025/07/Citizens_movement_for_rule_of_law_and_democracy_in_Serbia_%E2%80%93_child.pdf

¹⁰ https://zadecu.org/wp-content/uploads/2025/07/Citizens_movement_for_rule_of_law_and_democracy_in_Serbia_%E2%80%93_child.pdf

While the legislative framework recognizes the child's right to participation to a certain extent, the culture of respecting children's opinions within institutions remains underdeveloped. Consultations with children and youth are often conducted pro forma, without clear mechanisms to ensure that their proposals are considered in final decisions, further undermining trust in participatory mechanisms.

Within the school system, student parliaments in many environments function predominantly formally, lacking a real role in protecting students' rights or participating in decision-making. At the local level, youth councils are often non-existent, non-functional, or lack real mandates and influence. At the national level, institutional participation mechanisms do not operate continuously, further limiting opportunities for youth involvement in public policy.

In the broader socio-political context, there is a further **shrinking of the space** for freedom of expression, assembly, and the active participation of children and youth in matters of public importance. Such trends may have long-term consequences for the development of a democratic culture and youth's trust in institutions.

At the same time, the civil sector remains one of the few spaces where more meaningful models of participation are being developed, including child advocacy groups, the involvement of children as co-researchers, and digital forms of participation through campaigns, petitions, and peer advocacy.

7. Justice, Freedom, and Security (Chapter 24)

In the field of protecting children from violence, exploitation, and other security risks, serious systemic weaknesses persist. Although a normative and protocol framework exists to a certain extent, its implementation is inconsistent, and institutional responses often depend on individuals and local capacities rather than consistently applied standardized procedures.

Coordination between schools, social work centers, the police, healthcare institutions, and prosecution offices remains insufficient. This leads to delays in response, disruptions in the continuity of support, and the shifting of responsibility between institutions. In practice, this results in situations where children are left without timely protection and adequate support, often **"falling through the cracks"** of the system due to fragmented institutional responses.

In addition to challenges in inter-institutional cooperation, there is a continued need within the security and police sectors for further sensitization and training of professionals working with children, particularly regarding the protection of children's rights and handling sensitive situations. Reports of inadequate conduct in certain cases are deeply concerning, including documented instances of **excessive and disproportionate use of force** against students and children during protests in Serbia.¹¹ Such cases point to the need for a more consistent application of child rights protection standards, greater institutional accountability, and more effective oversight mechanisms regarding police conduct.

Of particular concern are the measures of **enhanced surveillance** in schools, including the procurement of **biometric cameras**¹² (in 30 schools). These measures have been assessed as **disproportionate**, problematic in relation to current regulations, and potentially harmful to the privacy, freedom of expression, and the

¹¹ <https://zadecu.org/wp-content/uploads/2025/06/Child-Human-Rights-Defenders-in-Serbias-Civic-Protests.pdf>

¹² <https://birnsrbija.rs/izvestaj-o-nabavkama-tehnologija-nadzora-u-srbiji/>

sense of security of children. Furthermore, they represent a sign of increased repression and control over students.

Additionally, organizations point to the rise of digital risks facing children, including online violence, harassment, and exposure to harmful content, while existing protection mechanisms fail to keep pace with the dynamics of the digital environment.

Institutional Accountability and Functioning of the Protection System

In the reporting period, one of the most prominent and consistent problems remains the lack of institutional accountability in protecting children's rights. Cases of inaction, delays in proceedings, inefficient procedures, a lack of sanctions, and the shifting of responsibility between different actors in the system have been recorded.

This issue specifically concerns social work centers, schools, the police, prosecution offices, and healthcare institutions. Inter-sectoral cooperation between these entities is neither consistent nor systemic, and communication often depends on individual initiatives rather than clearly defined and mandatory procedures. The consequences include delays in response, disruptions in the continuity of support, and situations where no single institution assumes full responsibility for the protection of the child.

Of particular concern is the practice of covering up peer and digital violence in schools, where reported cases are often handled "behind closed doors" without initiating appropriate disciplinary proceedings or involving the external protection network. Such a situation undermines public trust in the protection system, discourages the reporting of new cases, and further increases the risk for children who are already in vulnerable positions.

8. Social Policy and Employment (Chapter 19)

In the reporting period, the social protection system continues to operate under significant pressure, characterized by limited institutional capacities, a shortage of professional staff, and the uneven development of community-based services. Preventive and supportive services for children and families remain insufficiently developed, standardized, and accessible across the country.

A particular challenge is the lack of standardization of socio-educational and counseling-therapeutic services, which results in many community-based preventive services being practically non-existent or underdeveloped. This specifically concerns day-care centers for children and youth with behavioral challenges, intensive counseling-treatment programs, and early intervention mechanisms. Community-based services remain significantly uneven across local self-governments, directly impacting the accessibility of support for children and families.

Social Work Centers are facing excessive workloads, delays in proceedings, and an insufficient number of professional staff. In a significant number of cases, there is a failure to conduct timely field visits or risk assessments, while disciplinary proceedings for professional misconduct rarely result in meaningful accountability. The system still relies heavily on reactive measures rather than early intervention and prevention.

Child poverty and social exclusion remain a particular concern, especially for children in street situations, children from Roma communities, and children living in families without personal documents or formal residence. Children in these circumstances often live in informal settlements without basic living conditions, work on the streets, and remain outside the social protection system due to their inability to exercise rights to social assistance, health insurance, or child allowance.

The at-risk-of-poverty rate in 2025 stood at 19.6%, while children from Roma settlements and rural areas are disproportionately vulnerable. It is particularly concerning that only about 7% of children from Roma settlements attend preschool institutions, which deepens developmental and educational inequalities from early childhood.

A limited positive development in this area is the adoption of the Law on the Alimony Fund in June 2025, which introduces a mechanism for alimony payments from the state budget in cases where the liable parent fails to pay for at least two consecutive months. While this law is an important step in protecting the rights of the child and single parents, its actual impact will depend on consistent and effective implementation.

9. Education and Child Rights within the Education System (Chapter 26)

During the reporting period, the education system in Serbia has emerged as an area with particularly pronounced challenges regarding the realization of children's rights. There is a noted decline in the quality of the educational process, institutional instability in certain schools, diminished trust between actors in the system, and serious restrictions on the fulfillment of students' rights.

In several secondary schools, severe problems in institutional functioning have been recorded, including the suspension of classes, illegal recruitment of teaching staff, obstruction of the work of parents' councils and student parliaments, mass dismissals of leadership, and the imposition of emergency administrations. These situations directly impact not only the quality of education but also students' rights to assembly, freedom of expression, and participation in school life.

While formal mechanisms for student participation exist, their actual impact remains limited. During the drafting of the Action Plan for the Implementation of the Education Development Strategy until 2030, student proposals—specifically those regarding the alignment of the number of pedagogical assistants with actual needs and a clearer definition of indicators for monitoring student progress—were not taken into account¹³. Such practices indicate that participation often remains formal, without any real impact on public policies.

Regarding inclusive education, the gap between formally guaranteed rights and their practical realization remains significant. Children with disabilities, children from poor families, Roma children, and children in street situations continue to face serious barriers to accessing quality and full education. A large number of children from particularly **marginalized groups** complete primary education without **functional literacy**.

Additional concern is raised by trends regarding security and control in schools, including the **introduction of biometric surveillance**¹⁴ and restrictive measures such as the **total ban on mobile phones** in primary and

¹³ <https://www.srednjoskolci.org.rs/doprinos-akcionom-planu-za-sprovođenje-strategije-obrazovanja-u-2027/>

¹⁴ <https://birnsrbija.rs/izvestaj-o-nabavkama-tehnologija-nadzora-u-srbiji/>

secondary schools¹⁵. These measures are often implemented without adequate consultation with students and parents, raising questions about their impact on children's digital literacy, privacy, and the overall school climate.¹⁶

The **Draft Law on the Ban of Mobile Phone Use in Primary and Secondary Schools**, initiated by the **Protector of Citizens**, raises serious concerns from the perspective of children's rights and international standards.¹⁷ The proposed model introduces a general ban as the most restrictive measure, without clear evidence that milder and more proportionate solutions were previously considered. The mandatory handing over of devices, the keeping of records, and the imposition of disciplinary measures raise questions of **proportionality, privacy, data protection, and the equal treatment of children**, especially children with disabilities and students for whom mobile phones serve as assistive tools.

10. Media and Child Rights

The manner in which children are represented in the media has a direct impact on their safety, dignity, and the realization of their rights. During the reporting period, media reporting on children showed serious weaknesses regarding the protection of privacy, compliance with professional standards, and the inclusion of children as equal actors in the public sphere.

The research "Media Image of Children in Serbia 2025"¹⁸ shows that children are treated as a marginalized topic in domestic media, often exploited for the sake of sensationalism, while their perspectives and voices are almost entirely neglected.

According to the research findings, a segment about children is broadcast in the central news programs of televisions with national frequencies on average only every fifth day; daily newspapers publish an average of 1.4 texts about children per issue, while web portals publish an average of 5.3 texts per day. Simultaneously, as many as 71% of texts about children on the most-read portals have a negative connotation, while 57.5% of such texts are negatively intoned in the daily press. Violations of the Code of Ethics of Serbian Journalists regarding reporting on children are recorded in every fifth text on portals and every tenth in the press.

The success, achievements, and developmental perspectives of children remain almost invisible in the media, while dominantly negative reporting—mainly focusing on violence, accidents, and incidents—creates an unhealthy media climate and further endangers the well-being of children. The almost complete absence of children's voices contributes to a distorted public image of childhood and reinforces the perception of children as objects rather than rights-holders.

The high level of digital risks to which children are exposed is particularly concerning. Frequent cases of digital harassment have been recorded, with a significant number of children experiencing some form of online violence on a weekly basis. In practice, situations have been noted where schools and other institutions fail to react adequately or attempt to conceal incidents to avoid reputational damage.

An additional problem is the public targeting and media lynching of children and youth who participate in protests and other forms of public expression of opinion. This increases the risk of secondary victimization and further endangers their safety and dignity.

¹⁵ <https://zadecu.org/saopstenje-za-javnost-organizacija-civilnog-drustva-koje-rade-sa-decom-i-za-decu-2/>

¹⁶ <https://www.srednjiskolci.org.rs/telefone-volimo/>

¹⁷ <https://zadecu.org/pripremljen-set-ekspertskih-analiza-za-jacanje-kapaciteta-organizacija-i-javnosti-povodom-nacrta-zakona-o-zabrani-koriscenja-mobilnih-telefona-u-skolama/>

¹⁸ <https://ucpd.rs/wp-content/uploads/2025/11/ceprom-publikacija-medijska-slika-dece-u-srbiji-2025-1.pdf>

Key challenges in this area include insufficient protection of children's privacy, sensationalism in reporting, the absence of children's voices in the media, inadequate regulation of digital risks, and the weak application of existing professional standards.

Regulatory Authority for Electronic Media (REM)

The protection of children's rights in the media is directly linked to the functioning of the **Regulatory Authority for Electronic Media (REM)**, which plays a key role in supervising electronic media and protecting the public interest, including the protection of children from harmful, violent, and unethical content. The effectiveness of this system depends on the independence, transparency, and credibility of the regulator itself.

According to the **Law on Electronic Media**, REM is a functionally and financially independent body that protects the public interest in the field of electronic media and media service users. The law stipulates that the **REM Council** consists of nine members. However, the National Assembly missed the opportunity during its session on November 12, 2025, to elect a full Council based on the proposals of authorized nominators. Instead of nine, only eight members were elected, which led to the **resignations of four elected Council members** due to the compromised election process.

Child protection associations gathered within the **Network of Organizations for Children of Serbia (MODS)** participated in two election processes for the REM Council as authorized nominators, consistently insisting on compliance with the law, prescribed procedures, and full transparency.

Protecting children from harmful and unethical media content requires a regulatory framework that is credible, transparent, and operational. When there is doubt regarding the transparency of the election of Council members, or when the composition of the regulatory body is incomplete or contested, **public trust diminishes** regarding REM's ability to react effectively in cases of child rights violations, hate speech, sensationalist reporting, or the broadcasting of content harmful to children.

In this sense, the election of REM Council members is not merely an institutional or procedural issue; it has a direct impact on the protection of children's rights in electronic media. It is necessary to ensure a transparent and credible election process, strengthen the regulator's independence, and provide consistent supervision of content that may jeopardize the rights, safety, and well-being of children.

11. Mental Health of Children and Youth

Regarding the protection of children's mental health, a significant gap persists between the needs of children and youth and the available support services. This is accompanied by a chronic shortage of professional staff, territorial unevenness of services, and insufficiently developed preventive mechanisms.

Capacities within the **primary healthcare system** remain severely limited. In primary healthcare institutions, there is approximately one psychologist for every **16,540 children and adolescents**, while fewer than 50 child psychiatrists work within the public health system for the entire country. At the same time, the number of professional associates in schools is insufficient—averaging about **1.5 psychologists or**

pedagogues per school for more than 750,000 students. This significantly limits the possibility of providing timely support and conducting preventive work.¹⁹

Preliminary results of the national **Study on the Prevalence of Psychiatric Disorders in Children and Adolescents** indicate a serious scale of the problem: **20.4% of youth** aged 11 to 19 meet the criteria for at least one psychiatric diagnosis; 9% exhibit suicidal behavior; 4.2% reported a suicide attempt, while 14.5% report experiences of self-harm. More than half of young people report symptoms of anxiety, while less than a third utilize professional help.

A specific problem is that **professional services in schools** lack the time and capacity for preventive and counseling work, as they are largely burdened with administrative tasks. This further diminishes the possibility of early identification of problems and timely response.

An additional challenge is the **discontinuity in public policies and funding** for mental health services, including the absence of public calls for proposals from the Ministry of Tourism and Youth during 2025, and the uncertainty regarding the sustainability of certain support services, such as the Youth Center (**CEZAM**). Such instability directly affects the continuity of support and user trust in the system.

Without the systemic strengthening of public capacities, available community and school-based services, and stable funding for preventive programs, the mental health of children and youth remains an area where children's rights are not fully realized.

12. Children from Vulnerable Groups

During the reporting period, children from vulnerable groups continued to bear a disproportionately high burden of systemic weaknesses and institutional failures. The most at-risk groups include Roma children, children with disabilities, children living in poverty, children in alternative care, children in street situations, and children participating in protests or other forms of public expression.

Roma children remain particularly exposed to segregation, poverty, and early school leaving. Forms of **covert segregation** persist within the education system, including the formation of majority-Roma classes and the inappropriate referral of Roma children to schools for students with developmental disabilities. The high dropout rate among Roma girls is especially concerning, often linked to **child marriages**, which are still not effectively addressed as a violation of children's rights.

For **children with disabilities**, the greatest challenge remains the gap between formally guaranteed rights and their practical implementation. The lack of adequate support directly affects their ability to attend school regularly and fully participate in the educational system. Without such support, children are often forced into shortened school hours or face isolation and exclusion from the educational process.

¹⁹ <https://www.mzpokret.rs/wp-content/uploads/2026/03/Analiza-stanja-i-zagovaracki-okvir-za-Strategiju-mentalnog-zdravlja-u-Republici-Srbiji.pdf>

Children in street situations face extreme forms of discrimination, low-quality education, and almost total **institutional invisibility**. They often live in informal settlements without basic living conditions, work on the streets, and remain outside the social and healthcare systems.

Care leavers (children leaving alternative care) also remain insufficiently supported during their transition to independent living. The lack of supported housing programs, financial assistance, and institutional preparation for independence increases their risk of poverty and social exclusion.

13. Civil Society Environment

During the reporting period, the environment for civil society organizations (CSOs) has further deteriorated. Particularly pronounced are the issues of **non-transparent funding**, the favoring of government-aligned and formally existing but essentially inactive organizations (**GONGOs**), the reduction of public funds for independent actors, as well as political pressure and targeting in the public sphere.

During 2025, serious objections were recorded regarding the allocation of public funds intended for CSOs in the fields of education and youth policy. It was pointed out that a significant portion of funds in the Ministry of Education's call for projects in pre-university education was allocated to organizations **without visible references**, experience, or capacity for working with children and youth, while independent organizations with long-standing experience remained without support.²⁰ At the same time, budgets allocated to youth alliances, student associations, and youth support programs have been further reduced, and in some cases, completely abolished ²¹, specifically in instances where these organizations provided support to youth involved in civic initiatives and protests.

The **shrinking space** for civil society is further exacerbated by an increase in repression, surveillance, and the public targeting of organizations and activists. There is a documented rise in negative media campaigns, political pressure, and intensified institutional oversight, alongside growing **self-censorship** due to fear of repercussions for the organizations' operations and their beneficiaries.

14. Positive Developments

During the reporting period, **no significant systemic advancements** were recorded that would indicate a fundamental improvement in the status of children or the realization of their rights. Most identified problems persist, while positive examples are largely limited in scope and lack a broader systemic impact.

The following are noted as **limited positive developments**:

- The adoption of the **Law on the Alimony Fund**;
- Local action plans for youth developed with a certain degree of participation;
- Specific local practices for funding personal assistants and school companions;
- Individual activities and educational initiatives in the field of mental health.

These may serve as a basis for future improvement if followed by consistent implementation and systemic support.

²⁰ <https://www.srednjoskolci.org.rs/pegled-republickog-budzeta-za-obrazovanje-2026/>

²¹ https://koms.rs/2025/12/srbija_drzava_koja_urusava_sistem_brige_o_mladima/

Furthermore, in early April 2026, the Government of the Republic of Serbia established the **Council for the Rights of the Child**, which represents an important institutional step for coordinating policies and monitoring the state's obligations in this field. Additionally, at the end of March 2026, a public debate commenced on the **Draft Law on Amendments to the Family Law**. In April, work also began on the new **Program for the Prevention and Protection of Children from Violence in Serbia**.