

Professional rehabilitation and employment of persons with disabilities (PWDs) in Serbia /Host Country Case study/¹

1. PWDs position and participation in the labour market

The issue of professional rehabilitation and employment of persons with disabilities has come into public attention in Serbia simultaneously with the growing interest in the subject on a wider international level. Over previous decades, Serbia has accepted and ratified a number of international documents promoting protection of human rights, equal opportunities and inclusion of PWDs, including ILO Convention No. 159 and Recommendations No. 168 on Vocational Rehabilitation and Employment of Persons with disabilities issued in 1983 and the UN Standard Rules on the Equalization of Opportunities for People with Disabilities issued in 1993. In 2009 the National Assembly of Serbia ratified the UN Convention on the Rights of Persons with Disabilities (UNCRPD) issued in 2006², thus accepting it as legally binding instrument in the field of protection of human rights of persons with disabilities³.

Historical evidence in Serbia shows a several centuries-long tradition in recognition of persons with disabilities as a vulnerable group under the risk of poverty and social exclusion. Namely, the first legal act from the XIII century (*Zakonopravilo* or *Krmčija Svetoga Save*) mentions persons with physical disabilities (*deaf, blind, mute and crippled*) as vulnerable groups in need of social assistance⁴. In more recent history, protection of rights of PWDs was primarily based on the assistance provided by the state and state institutions. Financial support was distributed directly or through the associations of PWDs as well as through enterprises established under their auspices (so called *DES*, for more details see Box 1). However, until the beginning of the new millennium, disability in Serbia was mainly treated as a medical rather than a social problem reflecting on both economic and social well-being of PWDs.

Box 1: Enterprises employing PWDs in Serbia

In the Republic of Serbia, enterprises offering employment to persons with disabilities were established upon initiative of the Association of Deaf dating back to 1948 when *DES Novi Sad* (<http://www.des.co.rs/s/>) started its operations. Since its establishment, DES Novi Sad engaged primarily persons with hearing deficiency, yet also offered employment, professional rehabilitation, education and training to all PWDs capable of performing manual work. DES Novi Sad continued its operations as an enterprise for professional rehabilitation and

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² The Law on ratification of Convention on the Rights of Persons with Disabilities (Official Gazette of the Republic of Serbia No. 42/09).

³ Tatić, D., *Pravni okvir za zapošljavanje osoba s invaliditetom u Republici Srbiji*, Alternativa, Beograd, 2010.

⁴ Government of the Republic of Serbia: Poverty Reduction Strategy Paper.

employment of PDWs engaging 60% of PWDs among its employees in 2017. Several other DES enterprises established centuries ago still operated as enterprises for professional rehabilitation and employment of PDWs, including DES Belgrade (<http://www.hemija.rs/des-doo.html>) and DES Subotica (<http://www.des-kazani.rs/o-nama/>) engaging more than 70% of PWDs as employees.

Following the political changes in year 2000, the transition and EU accession processes accelerated. In line with that, the development of new regulation in accordance with the EU standards became one of the main drivers of change. With regards to PWDs, the Poverty Reduction Strategy Paper issued in 2003 came as the first strategic document focusing on their vulnerable position and setting specific goals directed at promotion of equal opportunities for this population in the fields of work, employment and education. It was followed by the National Employment Strategy Paper 2005-2010 which was rooted in the principle of non-discrimination and further recognized vulnerable position of PWDs in the labour market. The document enlisted a set of measures in support of enhancement of their activity in the labour market, employability and employment on the open labour market as well as through special forms of employment⁵.

Analysis of labour market position and participation of PWDs in social activities and labour market is quite limited due to rather low level of data sources about this particular population. Even the number of PWDs and their share in the total population in Serbia is only an estimate of between 500,000 and 800,000 persons belonging to this group⁶. According to Census data (2011), there are 571,780 (7.9%) PWDs in Serbia⁷ but the figure represents the number of persons who declared personal (self-perceived disability) or disability of a family member. It is thus generally accepted that PWDs represent 10% to 15% of the total population, which is the same as in the case of the world's population⁸. Various sources describe the overall labour market position of PWDs in Serbia in the first decade of the 21st century as rather weak, primarily due to their limited access to education and employment. Based on the available data, it is estimated that about 50% of PWDs had no more than primary education while only 13% had opportunity to work and one third of them was provided with a working place adjusted to their needs. In consequence, not only the impairment lowering the working capacities but also the low competencies of PWDs make this vulnerable group particularly hard-to-employ, especially under the unfavourable labour market conditions characterized by high unemployment rates.

While the unemployment rate in Serbia has been decreasing over the last few years, it is still over the threshold of 7%, which limits the choice of employers, thus opening more space for vulnerable groups to get hired. Namely, the unemployment rate in the last quarter of 2017 was 14.7%, thus contributing to a strong negotiation power on the side of employers. While the unemployment of PWDs is certainly much higher, we are yet unable to compare it with the general population since this particular population has not been traced by LFS in Serbia.

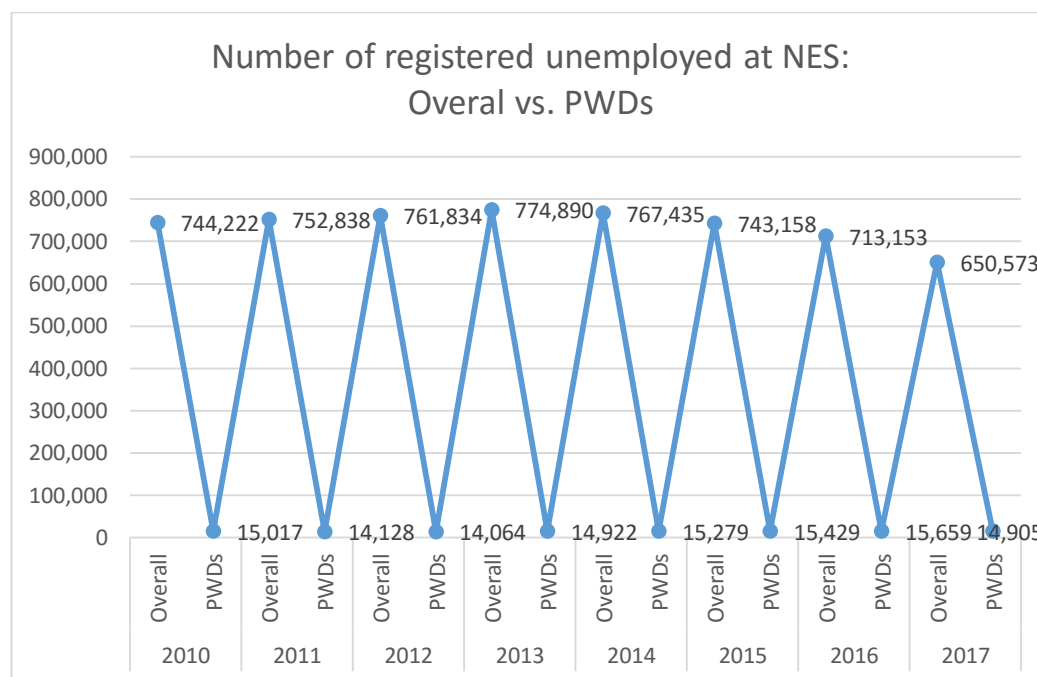
⁵ Government of the Republic of Serbia: National Employment Strategy Paper 2005-2010.

⁶ Zec, Z. Ostvarivanje prava osoba s invaliditetom na ravnopravno uključivanje na tržište rada – mesto i uloga sindikata, UGS Nezavisnost, Beograd, decembra 2009 (in Serbian).

⁷ Marković, M., Osobe s invaliditetom u Srbiji, Popis stanovništva, domaćinstava i stanova u Republici Srbiji, Beograd, 2014 (in Serbian).

⁸ Achieving Equal Employment Possibilities for PWDs through legislation, guidelines, International Labour Office, Geneva: ILO 2007.

However, data gathered in the unique information system (JIS) of the National Employment Service (NES) allow monitoring of labour market participation of PWDs. The number of registered PWDs, their participation in active labour market programmes (ALMPs) and employment are available from the NES registry. The available data show that the number of PWDs registered at NES has remained constant through years (see Graph 1 below), with a rather small share of all registered clients at NES (2.0% in 2010 vs. 2.3% in 2017).



Source: NES⁹

Registered PWDs differ substantially by structure (gender, age, competencies and unemployment spell) from registered NES clients in general. Namely, women are much less represented with only 1.67% among overall women registered at NES, or 33.14% women PWDs vs. 51.10% women overall in 2017. Additionally, registered PWDs seem to belong to older population, as young PWDs (15-34) represent 25.66% of all registered PWDs in comparison with registered young clients overall representing 34.66% share of NES clients. The most striking difference however comes from the fact that long-term unemployment is much more frequent among PWDs with 79.35% vs. 68.78% in the overall registered at NES waiting for employment for more than 12 months as of 2017. The figure explicitly points out the hard-to-employ status of PWDs, but it also calls for specific attention to the prevention of further deterioration of already very low skills of PWDs as a result of their long-term unemployment status. Namely, registered unemployed PWDs are generally less qualified with 39.25% of persons with no/low qualifications in comparison to 32.7% of persons with no/low qualified among registered unemployed overall at NES in 2017. Therefore, professional rehabilitation (with focus on institutional and workplace trainings) comes into place as one of the most important measures to enhance labour market position, employability and employment of PWDs.

⁹ The data represent annual averages of registered PWDs at NES who are active and ready to work thus differing from the total number of registered PWDs (22,582 as of 31.12.2016 according to NES annual report).

Over the years, the European Union as well as a number of international organizations (e.g. UNDP, ILO, USAID) have provided technical and financial support for developing legal background, enhancing public policies and building capacities of NES in delivering various active labour market programmes directed at PWDs. More recently, the project “*Increasing the Effectiveness of Employment Policies towards Disadvantaged Groups*”, funded through IPA 2012 direct grant, focused on the enhancement of employment of vulnerable groups and was successfully implemented by NES¹⁰. While the emphasis was in the first place on the effectiveness of employment policies directed at Roma, the project closely monitored and evaluated the implementation and effectiveness of services (Career guidance and counselling centres, Employment caravans) and measures (Job clubs, Trainings in response to labour market needs, Public works and Internship) directed at PWDs. On the other hand, the planned outcomes of an ongoing project within NES (*Technical Assistance in Capacity Building in Employment Policy*) funded through IPA 2013 direct grant, include the enhancement of services and measures directed at PWDs and improved quality of professional rehabilitation in enterprises for professional rehabilitation and employment of PWDs¹¹.

The actions taken by the Government of Serbia in the last 7 years have contributed to the enhancement of labour market position of PWDs in Serbia, yet there is still a long way to go to their full integration into society in general, and particularly in the fields of work and employment. However, in the first step, an adequate legal and strategic framework has been set up, allowing the implementation of created policies and measures directed at the enhancement of labour market position and possibilities for PWDs. The text below provides a detailed description of the regulatory framework (legislative and strategies) as well as labour market policies and measures directed at PWDs and gives an insight into the results achieved in the period from 2010 till 2017 with regard to the professional rehabilitation and employment of PWDs in Serbia.

2. Regulatory framework in the field of professional rehabilitation and employment of PWDs

The regulatory framework in the field of professional rehabilitation and employment of PWDs has substantially developed since 2000. Herein, the regulatory framework refers to all legal acts and strategic documents regulating the professional rehabilitation and employment of PWDs, based on policies and measures developed and implemented by governmental institutions responsible for the fields of labour and employment in Serbia (see Box 2).

The Law on professional rehabilitation and employment of persons with disabilities¹² is the main pillar of the legal framework in the field of professional rehabilitation and employment of PWDs

¹⁰ Marjanovic, D.&D. Aleksic, Evaluation of Trainings in response to labour market needs, Internships and Public Works Programmes implemented within the IPA 2012 Direct Grant; Ognjanov, G. &M. Rakic, Evaluation of interventions under IPA 2012 DG Contract: Job Clubs, Career Guidance and Counselling Centres and Employment Caravans.

¹¹ http://www.nsz.gov.rs/live/otopost/nama/Projekti/eu_podr_ka_nacionalnoj_sluzbi_zapo_ljavanje_ipa_2013.cid43306

¹² The Law on professional rehabilitation and employment of persons with disabilities, Official Gazette of the Republic of Serbia No. 36/2009 and 32/13.

in Serbia. It governs the promotion of employment of PWDs through the creation of conditions for equal participation of persons with disabilities in the labour market; assessment of their capacity for work; professional rehabilitation; obligation to employ persons with disabilities, conditions for establishment and operation of enterprises for professional rehabilitation and employment of persons with disabilities and other special forms of employment and recruitment of persons with disabilities, other issues relevant for professional rehabilitation and employment of persons with disabilities (Article 1). The Law has been in line with the positive legislative framework of the European Union and relevant international declarations and legal acts, ratified by the Republic of Serbia. Also, it has been in line with the legislative framework and strategic documents already in existence in Serbia, regulating the issues of human rights, including the right for employment and work, such are the Constitution of the Republic of Serbia¹³, the Law on Prevention of Discrimination against Persons with Disabilities¹⁴ and the Strategy for Improving the Position of Persons with Disabilities¹⁵.

Box 2: Regulatory framework relevant for the employment of PWDs

Legal acts and bylaws:

Labour Code (Official Gazette of the Republic of Serbia No. 24/2005, 61/2005, 54/2009, 32/2013 and 75/2014)

Law on professional rehabilitation and employment of persons with disabilities (Official Gazette of the Republic of Serbia No. 36/2009 and No. 32/13)

Law on Employment and Unemployment Insurance (Official Gazette of the Republic of Serbia No. 36/2009, 88/2010, 38/2015, 113/17 and 113/17 other law)

The Law on Contribution for Mandatory Social Security Insurance (Official Gazette of the Republic of Serbia No. 84/2004, 61/2005, 62/2006, 5/09, 52/2011, 101/2011, 47/2013, 108/2013, 57/2014, 112/2015, 113/2017)

Regulation on more detailed conditions, criteria and standards for the implementation of measures and activities of professional rehabilitation (Official Gazette of the Republic of Serbia No. 112/2009)

Regulation on more detailed manner, cost and criteria for assessing working capacity and employment opportunities or maintenance of employment of people with disabilities (Official Gazette of the Republic of Serbia No. 36/2010 and 97/2013)

Regulation on the method of monitoring the execution of duties of employment of persons with disabilities and the way of proving the realization of these duties (Official Gazette of the Republic of Serbia No. 101/16)

Regulation on issuing, content and form of license of inspectors for monitoring Law on professional rehabilitation and employment of persons with disabilities (Official Gazette of the Republic of Serbia No. 97/2009, 101/2012 and 65/2014)

Regulation on more detailed content of data and the way of managing databases in the area of employment (Official Gazette of the Republic of Serbia No. 15/2010)

Decision on the establishment of the Budget Fund for professional rehabilitation and employment of persons with disabilities (Official Gazette of the Republic of Serbia No. 36/2010, 83/2012 and 46/2013).

¹³ The Constitution of the Republic of Serbia, Official Gazette of the Republic of Serbia No 98/2006

¹⁴ The Law on Prevention of Discrimination against Persons with Disabilities, Official Gazette of the Republic of Serbia No. 33/2006

¹⁵ The Strategy for Improving the Position of Persons with Disabilities, Official Gazette of the Republic of Serbia No. 01/2007

National strategies

Poverty Reduction Strategy Paper (2003)
National Employment Strategy 2005-2010
National Employment Strategy 2011-2020
Social Protection Development Strategy (2005)
Strategy for Improving the Position of Persons with Disabilities (2007)

The Law on professional rehabilitation and employment of PWDs is built upon the principle of non-discrimination which has been established as one of the fundamental principles of the Constitution of the Republic of Serbia and with regards to PWDs, further guaranteed by the Law on Prevention of Discrimination against Persons with Disabilities. In addition, it is built upon a novel approach toward protection of rights of PWDs in Serbia, enrooted in the Law on Prevention of Discrimination against Persons with Disabilities and the Strategy for Improving the Position of Persons with Disabilities. In accordance with changed international standards, the documents promoted a new definition of PWDs which placed emphasis on social barriers preventing their inclusion in social activities rather than on their medical condition as such (*from patient to citizen approach*). The Law on Prevention of Discrimination against Persons with Disabilities defined PWDs as *persons with congenital or acquired physical, sensory, intellectual or emotional inabilities without or with limited opportunities to participate in social activities at the same level with others due to social or other barriers, with no regard if they could perform those activities with the use of technical aids or other kind of support* (Article 3).

The Strategy for Improving the Position of Persons with Disabilities served as a mid-term plan of activities directed at provision of support to PWDs toward their social integration and protection of their human rights, developed in line with other relevant strategic documents, e.g. Social Protection Development Strategy¹⁶. The main objectives included the development of policies and measures and implementation of special programmes in the fields of education, employment, work and habitation allowing equal opportunities for PWDs and supporting their independence, personal development and active participation.

The Law on professional rehabilitation and employment defines PWDs in line with the accepted human-rights approach as *the person suffering permanent consequences of bodily, sensory, mental and psychiatric impairment or sickness which cannot be eliminated by any treatment or medical rehabilitation and faced with social and other limitations affecting his/her working capacity and possibility to find or retain employment and who does not have the possibilities or has reduced possibilities to be included in the labour market or apply for employment on equal terms with other persons* (Article 3). In accordance, *an unemployed person with disability is the person of 15 to 65 years of age who has no labour relations or has not otherwise achieved the right to work, who is willing to work and accept professional rehabilitation for the purposes of employment and who actively seeks employment and is registered in the unemployment records with the organization in charge of employment issues*. Pursuant to the Law, PWDs are entitled to: *have her/his status established and work capacity assessed; promotion of employment, labour and social inclusion and affirmation of equal opportunities in the labour market; professional rehabilitation measures and activities; employment under general conditions; employment under*

¹⁶ Social Protection Development Strategy, Official Gazette of the Republic of Serbia No.108/05.

special conditions; active employment policy measures; employment in specially organised forms of employment and recruitment of persons with disabilities; other rights in accordance with the law (Article 6).

Apart from the Law on professional rehabilitation and employment of persons with disabilities, there are several other legal acts relevant for the employment of PWDs, such as the Labour Code¹⁷, the Law on Employment and Unemployment Insurance¹⁸ as well as the Law on Contribution for Mandatory Social Security Insurance¹⁹. Namely, the Labour Code bans discrimination based on personal disabilities (Article 18). The Law on Employment and Unemployment Insurance is governed by the principle of affirmative actions directed toward hard-to-employ unemployed persons (Article 5) who may take precedence in having special rights in the implementation of certain active employment policy programmes and measures in accordance with the Law (Article 31). The Law on Contribution for Mandatory Social Security Insurance envisages the removal from obligations for paying contributions for mandatory social security insurance for newly employed PWDs for the period of three years (Article 45b). In addition, a number of bylaws (i.e. regulations and decisions) have been issued to assure proper implementation of policies and measures directed at PWDs envisaged by the strategic documents and legal acts regulating the field of employment of PWDs (for more details see Box 2).

The National Employment Strategy 2011-2020²⁰ has placed employment of PWDs among the main objectives. It envisages increased participation in ALMPs and increased employment of PWDs as expected outcomes against the baseline of 2,264 PWDs included in ALMPs in 2009 and 1,609 PWDs registered at NES, who found employment in 2010. The implementation of the Strategy is assured through annual National Employment Action Plans, which further develop the measures in support of employment of PWDs.

The development and implementation of legal and regulatory framework in the field of labour and employment, including employment and professional rehabilitation of PWDs is a core responsibility of the Ministry of Labour, Employment, Veterans and Social Affairs (MoLEVSA) and National Employment Service (NES) in Serbia.

MoLEVSA is responsible for policy making, i.e. the creation and implementation of policy measures to support social inclusion of PWDs and prevent their exclusion from the labour market by rising their motivation and improving skills and knowledge to assure their competitiveness in the labour market. NES is responsible for organizing, planning and implementing a set of active labour market programmes (ALMPs) directed at PWDs to improve the employability and employment of this hard-to-employ population group in the labour market.

¹⁷ The Labour Code, Official Gazette of the Republic of Serbia No 24/2005, 61/2005, 54/2009, 32/2013 and 75/2014

¹⁸ The Law on Employment and Unemployment Insurance, Official Gazette of the Republic of Serbia No 36/2009, 88/2010 and 38/2015.

¹⁹ The Law on Contribution for Mandatory Social Security Insurance, Official Gazette of the Republic of Serbia No. 84/2004, 61/2005, 62/2006, 5/09, 52/2011, 101/2011, 47/2013, 108/2013, 57/2014, 112/2015, 113/2017

²⁰ Government of the Republic of Serbia: The National Employment Strategy 2011-2020.

3. Employment policy for PWDs

The employment policy built in the Law on professional rehabilitation and employment of PWDs (the Law) is based both on the principle of equality and the affirmative action toward PWDs. The principle of equality is being promoted through setting grounds for assuring equal opportunities for PWDs at the labour market based on an assessment of work capacity, offering professional rehabilitation as well as support in employment through reasonable accommodation and employment subsidies. On the other hand, a quota-levy scheme has been introduced by the Law as the affirmative action undertaken to enhance employment of this hard-to-employ vulnerable group.

The Law has set the legal ground for the implementation of the new policies directed at PWDs and the assessment of work capacities of PWDs (see Box 3) based on a multidisciplinary approach. Pursuant to the Law, PWDs belong to a rather diversified group of persons including disabled war veterans, disabled war veterans in peacetime, disabled war veterans in civil service, persons categorised as disabled persons and persons whose work capacity is assessed under this Law. The recognized status of PWDs entitles the right granted by the Law with regards to equal opportunities at the labour market, finding employment and retaining their jobs.

Box 3: Assessment of work capacity

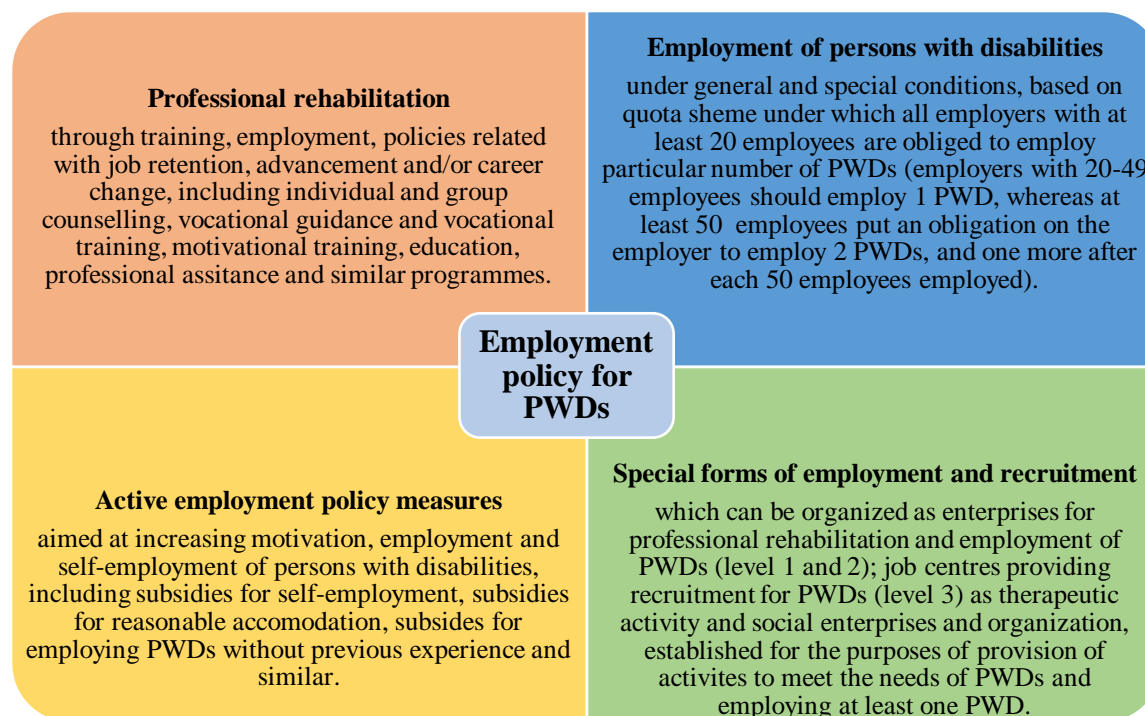
The new assessment of work capacity uses medical, social and other criteria to assess possibilities of PWD for inclusion in the labour market and their capabilities to perform concrete work. In accordance with the Law, PWDs can be employed under general conditions or special conditions. The assessment is based on a four-level scale, where level 0 acknowledges minor difficulties and obstacles not affecting the working capacity; level 1 acknowledges difficulties and obstacles that are small but affecting the working capacity; level 2 acknowledges moderate or substantial difficulties and obstacles affecting working capacity and level 3 acknowledges multiple difficulties and obstacles severely affecting the working capacity at the extent at which a person could perform less than one third of an average performance expected with relation to the job placement. While level 0 doesn't give a person a PWD status in accordance with the Law, level 1 allows persons' employment under general conditions (i.e. job placement with an employer without adjusted work activities, workplace or work activities and workplace) and level 2 under special conditions (i.e. job placement with an employer with the adjustment of work activities, workplace or work activities and workplace). Level 3 doesn't entitle a person to employment either under general or special conditions while she may be engaged within Work center representing a special form of employment and recruitment envisaged by the Law.

Assessment of work capacities makes an important step in recognizing status of PWDs. According to NES annual reports, assessment of work capacities was performed for between 4,200 and 5,700 persons annually in the period from 2011 till 2017, which makes one third of all registered PWDs at NES in the same period. Persons categorized under levels 1, 2 and 3 are entitled status of PWDs which makes them eligible for exercising the right on employment

policies and measures specially created in support of this hard-to-employ group. PWDs categorized under levels 1 and 2 are engaged in ALMP and may be employed under general or special conditions.

Employment policies directed at PWDs are grounded in professional rehabilitation, employment, active labour market policy measures and special forms of employment and recruitment of PWDs as its four main pillars (see figure 1 below).

Figure 1: Four pillars of employment policy directed at PWDs



Employment policies (i.e. professional rehabilitation, active employment policy measures and special forms of employment and recruitment) are financed from the established Budget Fund for professional rehabilitation and employment of PWDs (the Fund). Employers are relieved from the obligation to employ a PWD should they decide to participate in income of a PWD employed in enterprises for professional rehabilitation and/or social enterprises in the amount of not less than 50% of average income in the Republic of Serbia (Article 26). In addition, they may be relieved from the obligation by signing business contracts and procurement agreements for purchase of products or services with an enterprise for professional rehabilitation and employment of PWDs in the amount of 20 average incomes per each PWD they are obliged to employ (Article 27).

Available data²¹ show that the number of employers with the obligation to employ PWDs has increased over the last three years, from 6.592 in 2015 to 8.066 employers in 2017, i.e. 22.4%. In the same time, the number of employed PWDs in accordance with the quota scheme has

²¹ Report on accomplishing the obligation to employ PWDs (source: MoLEVSA, in Serbian).

increased from 14,646 in 2015 to 18,791 employed PWDs in 2017 (January to October 2017 average), i.e. 28.3% in the observed period. Contributions (50% of average income in the Republic of Serbia per one PWD due to employ) paid by employers failing to accomplish the obligation to employ PWDs in accordance with the quota scheme have been relatively constant since 2015, amounting at between 2,6 and 2,8 billion RSD annually. In addition, number of business contracts and/or procurement agreements with enterprises for professional rehabilitation and employment of PWDs has substantially increased, from 78 contracts signed and reported in 2015 to about 257 contracts for the first ten months in 2017. Total contracted amount has also increased from 6.2 billion RSD in 2015 to 9.5 billion RSD in 2017. Taking into consideration issuing the new *Regulation on the method of monitoring the execution of duties of employment of persons with disabilities and the way of proving the realization of these duties*²² in 2016 it seems likely that allowing accomplishment of the obligation to employ PWDs through signing contracts based on smaller individual values²³ has particularly contributed to increasing use of this modality of execution of the obligation stemming from the quota scheme.

The Fund is managed by MoLEVSA and allocated for: 1) financing employment of PWDs through special forms of employment and recruitment (Special forms of employment for PWDs) and 2) financing programmes related with professional rehabilitation and active employment policy measures which are carried out through NES (ALMPs for PWDs). The table below shows the allocation of the Fund for financing employment policies in the period from 2011 till 2017. Allocation of funds is shown separately from actual amounts spent (delivery) and the actual utilisation of allocated funds is calculated as % of realization.

Table 1: Allocation and Delivery of the Budget Fund for professional rehabilitation and employment of PWDs (the Fund)

²² Regulation on the method of monitoring the execution of duties of employment of persons with disabilities and the way of proving the realization of these duties, Official Gazette of the Republic of Serbia No. 101/16.

²³ Prior to 2016, quota-levy scheme was based on business contract and procurement agreement signed with enterprises for professional rehabilitation and employment of PWDs amounting at 20 average salaries in the Republic of Serbia per one individual contract. However, limited production and delivery capacities of these enterprises substantially hindered the use of this modality to fulfill the quota obligation by employers. Therefore, a recommendation to change such an approach provided in the document *Assessment of the implementation of the Law on Professional Rehabilitation and Employment of Persons with Disabilities (PWDs) in Serbia*, UNDP 'Enhanced Capacities for Human Development' Project, Belgrade 2016 (obtained from MoLEVSA) resulted issuing of the new Regulation (see footnote above).

Year	The Fund for PWDs (mil RSD)			Special forms of employment of PWDs (mil RSD)			ALMPs for PWDs (mil RSD)		
	Allocation	Delivery	% of realization	Allocation	Delivery	% of realization	Allocation	Delivery	% of realization
2011	2.120	1.281	60	1.320	925	70	800	356	45
2012	1.895	1.478	78	1.145	781	68	750	697	93
2013	1.695	1.177	69	995	772	78	700	405	58
2014	1.270	964	76	751	721	96	519	243	47
2015	1.250	1.073	86	750	749	100	500	323	65
2016	1.250	1.050	84	700	639	91	550	411	75
2017	1.250	1.172	94	700	696	99	550	476	87
Total 2011-	10.730	8.195	76	6.361	5.283	83	4.369	2.911	67

Source: NES and MoLEVSA

As shown above, the part of the Fund invested in special forms of employment of PWDs has remained greater though the total funds have decreased through the observed period after the enforcement of the Law. However, realization (i.e. utilisation of the allocated funds) has been increasing for the last four years, reaching 94% of realization of the Fund for PWDs, with 99% of realization in the part directed at special forms of employment of PWDs and 87% or realization in the part directed at ALMP for PWDs in 2017.

Financing special forms of employment of PWDs (refereeing to support measures provided for enterprises for professional rehabilitation and employment) is administered through MoLEVSA. In accordance with Articles 40 and 41 of the Law, these support measures include 1) compensation for the participation in income in the amount 50% of the average income in the Republic of Serbia (i.e. subsidised salary of PWDs employed in enterprises for professional rehabilitation and employment) on monthly basis and 2) provision of funds for improvement of working conditions and production programmes, introduction of standards, improvement of product and service quality, adjustment of workplaces or other purposes.

Box 4: Establishment of enterprises for professional rehabilitation and employment of PWDs

Enterprises for professional rehabilitation and employment of PWDs are legal entities established to employs and conducts professional rehabilitation of persons with disabilities in accordance with the Law (Article 35).

Employment of PWDs

Enterprises for professional rehabilitation and employment of PWDs may be founded by the Republic of Serbia, autonomous province, local government unit, company, association of persons with disabilities or any other legal or natural person, for the purposes of creation of new jobs and job placement of persons with disabilities, provided that they employ at least 5 PWDs based on permanent contract, at least 50% of PWDs based on temporary contracts within the total number of employees out of which, at least 10% of PWDs who can be employed only under special conditions (level 2), professionals for vocational training and rehabilitation of persons with disabilities, if the enterprise employs more than 20 persons with disabilities i.e. outsources

professionals if the enterprise employs less than 20 persons with disabilities as well as provided such legal entities have provided adequate space and technical and other equipment for vocational training and work of persons with disabilities and are licensed for carrying on the business activity (Article 36).

Conducting professional rehabilitation for PWDs

In addition to providing employment to PWDs with regards to the business activities they obtained the licence to perform, the enterprises for professional rehabilitation and employment of PWDs also implement the programme of measures and activities for professional rehabilitation for persons with disabilities (e.g. vocational training, additional training, re-training, skills development, individual and group programmes aimed at improvement of labour and social integration) to those employed in such enterprises but also to high school students acquiring education according to the syllabus designed for handicapped students and persons with disabilities included in the measures and activities for professional rehabilitation (Article 39).

The Law envisaged establishment of enterprises for professional rehabilitation and employment of PWDs as a special form of employment and recruitment of PWDs which shall be conducted by legal entities founded by the Republic of Serbia, autonomous province, local government unit, company, association of persons with disabilities or any other legal or natural person, for the purposes of creation of new jobs and job placement of persons with disabilities (detailed description is provided in Box 4). The newly established enterprises for professional rehabilitation and employment of PWDs came in as legal successors of previously existent *sheltered workshops* many of which had operated as separate units of big public companies (e.g. *Zastitna radionica* established in 2005 by JSC Serbian Railways or *Lola preduzetnistvo* established in 1997 by Lola Corporation). Existing sheltered workshops re-registered into enterprises for professional rehabilitation and applied for restructuring and transformation. Many of these now operate as state-owned companies or private initiatives, while new enterprises have also been established in accordance with the Law. The total number of enterprises for professional rehabilitation has decreased from 59 before the enforcement of the Law to 43 in 2011. However, over the following years new enterprises have been established employing around 1,700 employees annually, with more than two thirds of them belonging to PWDs. In 2017 there were 51 enterprises for professional rehabilitation and employment of PWDs who applied for subsidies offered through the Fund in the amount of 639.494.586,03 RSD (5.272.008 EUR), employing 1,881 employees, 1,261 of which were PWDs.

4. Active labour market programmes (ALMPs) for PWDs

NES is responsible for planning, implementing, delivering, monitoring and evaluation of the effects of ALMPs for PWDs, which are financed from the Fund since 2011 (see Table 1 above). Herein, the ALMPs include diverse set of services and programmes in the field of professional rehabilitation as well as active employment policy measures (i.e. programmes for enhancing employment of PWDs and support measures for reasonable accommodation aimed at PWDs employed under special conditions). For the purposes of this case study, these are classified into three broad groups (see Box 5 for details).

Box 5: Types of ALMPs for PWDs delivered by NES

Over the observed period NES has delivered a number of ALMPs for PWDs including those available exclusively to disabled and general measures available to all NES clients. While programmes delivered may vary in type through years, for the purpose of this Case study ALMPs have been classified in three broad groups:

I - Measures and activities of professional rehabilitation of PWDs

Employment fairs, Job clubs, Active job search training (ATP 1),
Self-efficiency training (ATP 2), Trainings for the labour market,
Trainings at the request of employer, Workshops dealing with stress of job loss,
Acquiring practical knowledge, Professional practice,
Educational programmes for entrepreneurship and similar programmes aimed
at provision of information, education and guidance in career change and development

II - Programmes for enhancing employment of PWDs

Subsidies for self-employment, Subsidies for salaries of PWDs without work experience,
Subsidies for opening new jobs, Public works

III – Support measures for PWDs

Refunds for reasonable accommodation of workplace for PWDs
employing under special conditions, Refund of costs for engaging
professional assistance to PWDs

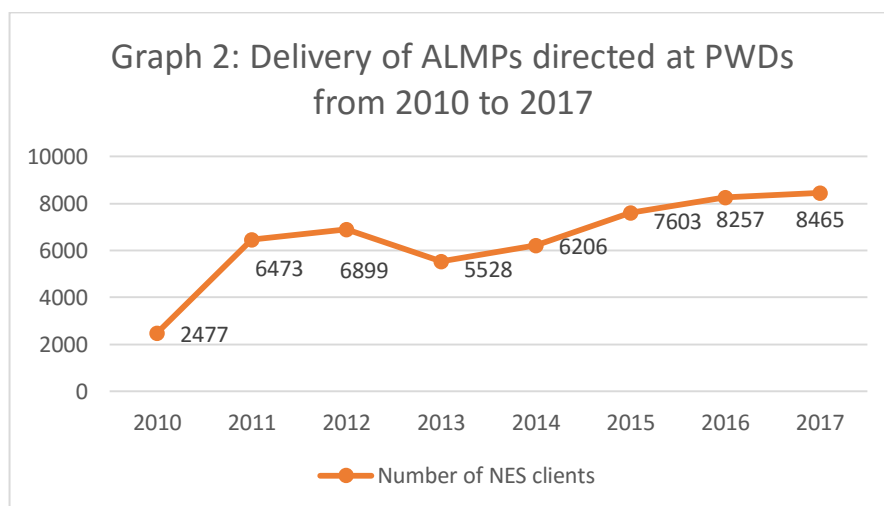
Centre for professional rehabilitation was established in 2009 in NES branch office in Belgrade, as the first contact point for PWDs through which they will be offered information, individual and group counselling, trainings and other available programmes aiming at enhancement of their employability and employment as well as labour and social integration. Further improvements in services and support for PWDs as well as delivering ALMP were enabled through the new organization of NES activities and units introduced in 2015. In accordance, PWDs were directed to newly appointed counsellors for PWDs in NES branch offices throughout the Republic of Serbia. NES human resources as well as their competencies in provision of services and support to PWDs have been developed on the country level which substantially contributed to further standardization of activities directed at PWDs previously available through four regional Centres. The new Department for Professional Rehabilitation and Employment of PWDs has been established within the NES Head Office thus contributing to further improvement of planning and monitoring of activities and ALMPs implemented through NES Branch offices.

As of 2015, package of services for PWDs was first time implemented providing a set of services and measures based on developed individual employment plans for registered PWDs. In the first year of implementation of package of services for PWDs NES counsellors drafted 22,382 individual employment plans based on which about 7,600 clients (2,997 women) were included in ALMPs²⁴.

Number of PWDs included in ALMPs has grown substantially since the establishment of the Fund in 2011 (see graph 2, below). Year 2010 is presented as a baseline, with no public calls announced separately for PWDs and less than 2,500 NES clients from this vulnerable group included in ALMPs. Establishment of the Fund and allocation of funds for financing professional rehabilitation and employment of PWDs allowed provision of ALMPs for almost 6,500 registered PWDs at NES in 2011. The number of PWDs included in various programmes offered

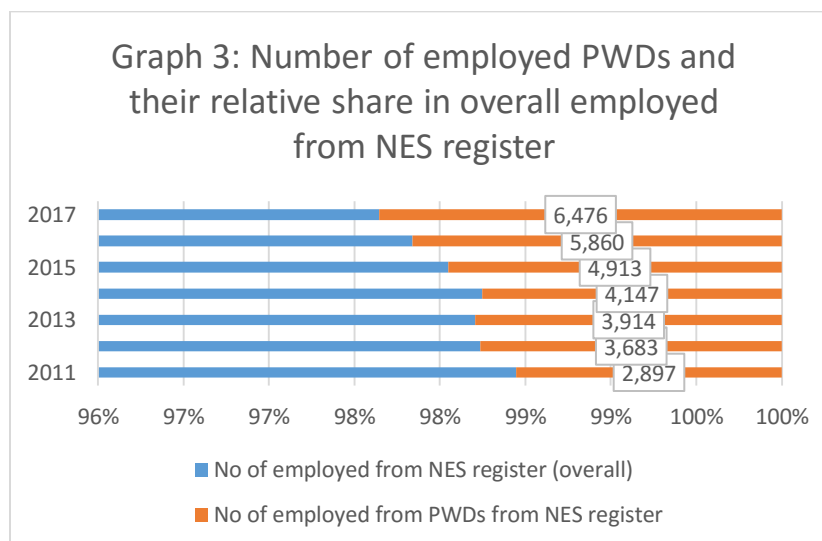
²⁴ Source: Report on the implementation of NEAP 2015 (MoLEVSA and NES)

through NES continued to grow in the following years (with an exception of a decline which appeared in 2013) reaching almost 8,500 in previous year.



Source: NES

Participation of PWDs in ALMPs is substantial also according to 5.6% share of involved PWDs in overall NES clients participating in ALMPs, compared with their 2.2% share in overall registered clients at NES in 2016. The effects on employment of PWDs may be judged based on relative share of employed PWDs which, in the same year, was 2.21%. Graph 3 below shows that the number of employed PWDs from the NES register has been constantly increasing from 2,897 PWDs employed in 2011, reaching 6,476 employed as of 2017. In the same period, their relative share in overall employed from the NES register increased from 1.58% to 2.41%.



Source: NES

Employment of women PWDs also showed increasing trend over the observed period (i.e. from 993 women PWDs employed in 2011 to 2,570 employed in 2017), yet its share in overall

employed women from the NES register stayed relatively smaller than the share of employed PWDs in overall employed from the NES register (1.86% vs. 2.41% respectively in 2017).

In addition to the above, relative shares of employed in registered clients at NES both overall and PWDs may also be taken into consideration to further evaluate the effects of the employment policies directed at PWDs. In accordance with the data presented in Table 2 below it is evident that the share of employed PWDs from the NES registry has increased from initial 20.51% in 2011 to 43.45% in 2017. It should be stressed that for the first time last year the relative share of employed PWDs outreached the respective share of employed overall by 2.18 percent points.

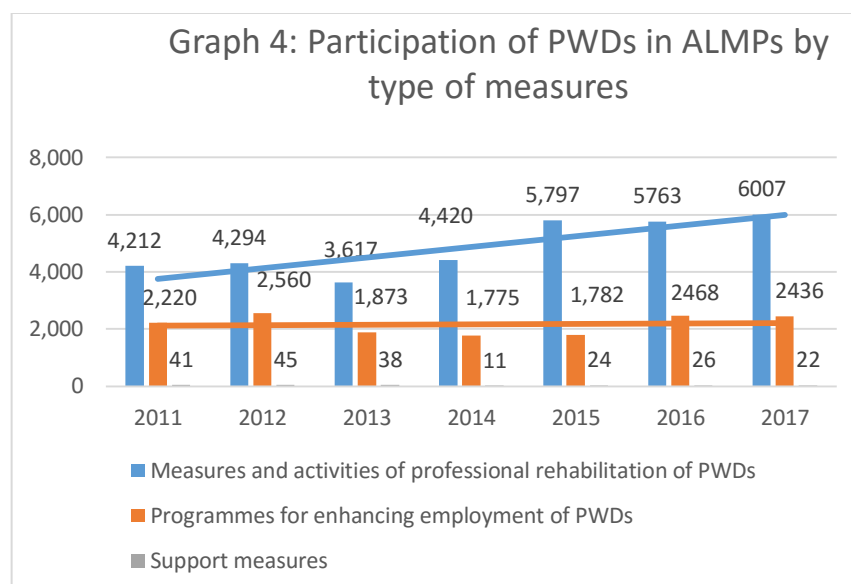
Table 2: Employment of registered NES clients, overall and PWDs

	2011	2012	2013	2014	2015	2016	2017
REGISTERED UNEMPLOYED OVERALL	752.838	761.834	774.890	767.435	743.158	713.153	650.573
REGISTERED UNEMPLOYED PWD	14.128	14.064	14.922	15.279	15.429	15.659	14.905
SHARE OF EMPLOYED OVERALL	24,37	26,95	27,68	30,27	33,21	37,17	41,27
SHARE OF EMPLOYED PWD	20,51	26,19	26,23	27,14	31,84	37,42	43,45

Source: NES

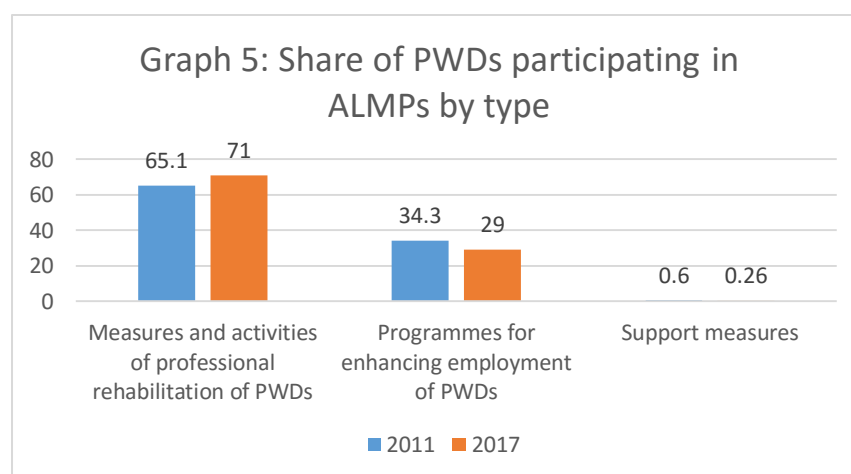
Therefore, the establishment of the Fund in 2011 and the implementation of the employment policies directed at PWDs have undoubtable resulted in higher involvement of PWDs in ALMPs as well as higher employment of PWDs. It is also evident that to achieve similar effects on employment as in the case of overall registered at NES relatively higher involvement of PWDs in ALMPs is needed. However, firm conclusions with regards to such a notion could be derived only after analysing participation of PWDs in particular types of ALMPs and their actual effectiveness related with employment. The text below provides some important inputs for such an analysis and points to the need for relying more intensively on implementation of programmes related with institutional and workplace trainings.

Among the three groups of ALMPs directed at PWDs, measures and activities of professional rehabilitation remain absolutely dominant with the highest participation of PWDs registered at NES (see graph 4). Additionally, participation of PWDs grew substantially over the observed period, from 4,212 PWDs in 2011 to 6,007 PWDs in 2017. On the other hand, programmes for enhancing employment of PWDs involved much less PWDs, showing rather flat growing trend from 2,220 involved PWDs in 2011 to 2,436 PWDs who participated in 2017. Support measures are almost insignificant with only 22 PWDs who benefited from this type of programmes in 2017.



Source: NES

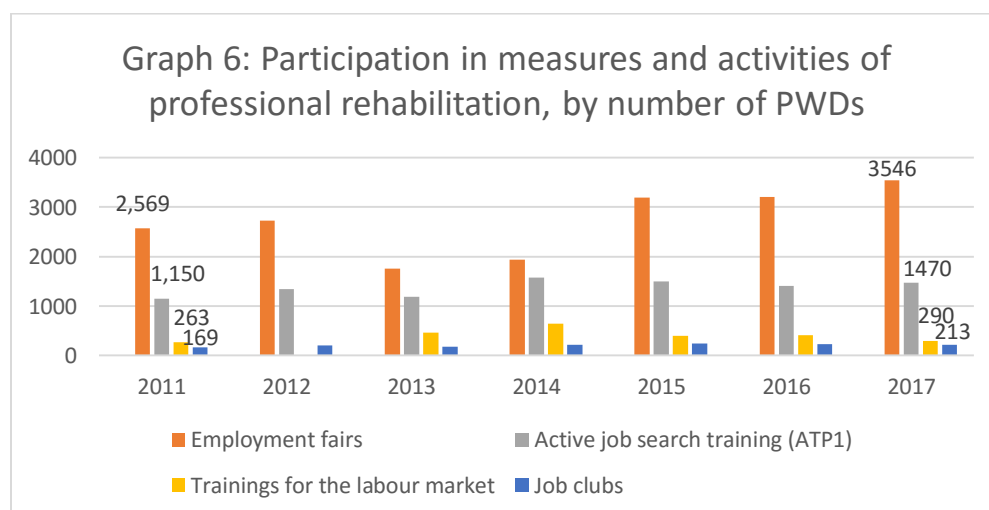
It is evident that the share of PWDs involved in each of the three groups of programmes has changed in favour of measures and activities of professional rehabilitation. Graph 5 below clearly shows that the share of PWDs participating in measures and activities of professional rehabilitation have increased from 65% to 71% whereas the share of PWDs involved in programmes for enhancing employment has dropped from 34% to 29% over the observed period. Rather small participation in support measures has become even more underrepresented, dropping from 0.6% to 0.26% in 2017.



Source: NES

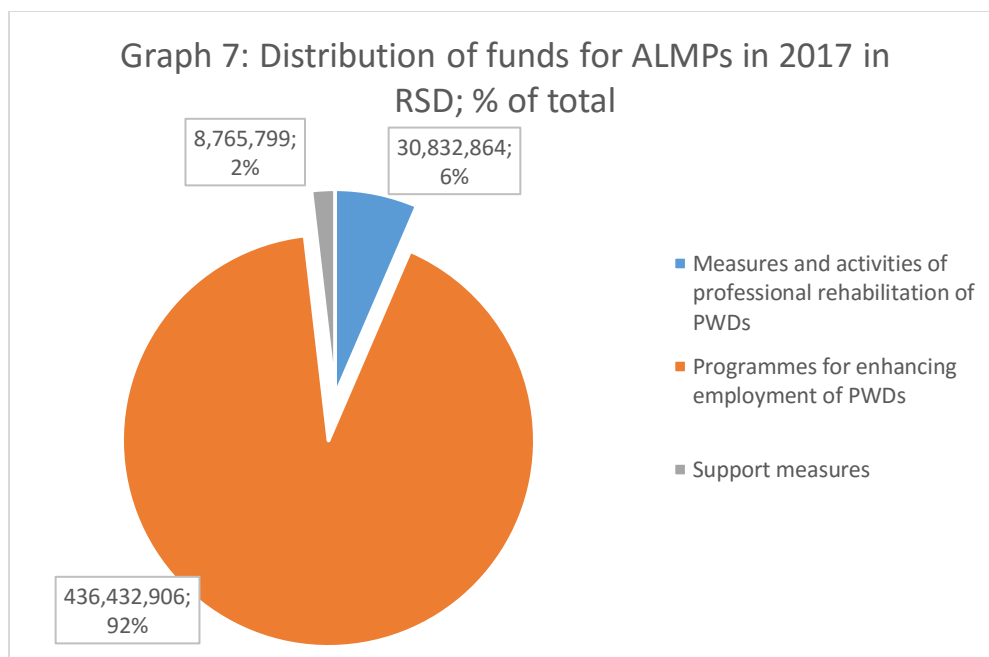
Among the three groups of ALMPs measures and activities of professional rehabilitation are the most diversified by types of programmes offered to PWDs. However, in a broad range of different programmes directed at PWDs only a few are dominating by the number of participating PWDs. As shown on Graph 6, registered PWDs have participated mostly in Employment fairs, Active job search training (ATP 1), training for the labour market and Job clubs. While the number of PWDs participating in Employment fairs has substantially increased

over time (from 2,569 to 3,546) the increase was quite moderate with regards to other three types of programmes: from 1,150 to 1,470 PWDs participating in Active job search training (ATP1); from 263 to 290 PWDs participating in trainings for the labour market and from 169 to 213 PWDs participating in Job clubs. With regards to previously commented lower effectiveness of ALMPs directed at PWDs, the fact that Employment fairs make the most frequently used programme may provide an adequate explanation. Namely, this programme aims primarily at providing information on the labour market opportunities and its direct effects on employment are hard to assess. On the other hand, PWDs in Serbia participate in trainings for the labour market and in particular, trainings at the request of employer at lesser extent (e.g. less than 290 PWDs participated in trainings for the labour market and no PWDs participated in training at the request of employer in 2017). However, institutional and workplace trainings may be of crucial importance for enhancement of employability and employment of persons under the risk of exclusion from the labour market due to reduced capacities for performing particular jobs in combination with no/low qualifications and long unemployment spell, all of which is particularly the case with PWDs in Serbia.



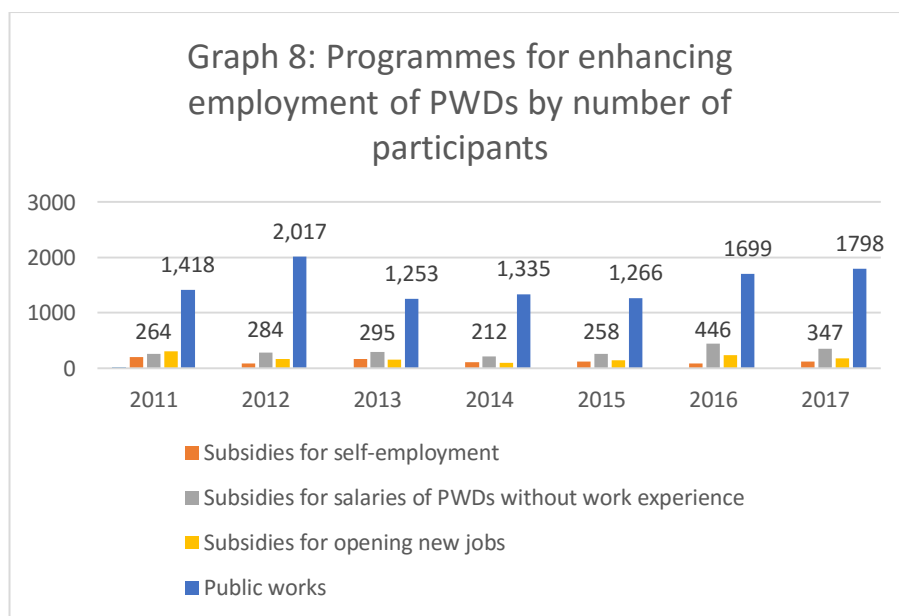
Source: NES

Measures and activities of professional rehabilitation are relatively inexpensive in comparison with the other two groups of ALMPs for PWDs. Over the observed period from 2011 till 2017, a substantially lower share of the total funds was invested in this group of ALMPs (4.22% median value) yet achieving substantially higher participation of PWDs. On the other hand, the highest share of the overall funds were invested in programmes for enhancing employment of PWDs (93.55%), while support measures amounted to remaining 2.21%. In 2017, the total amount spent on ALMPs was 476.031.568 RSD which was distributed among the three groups of measures as shown on graph 7.



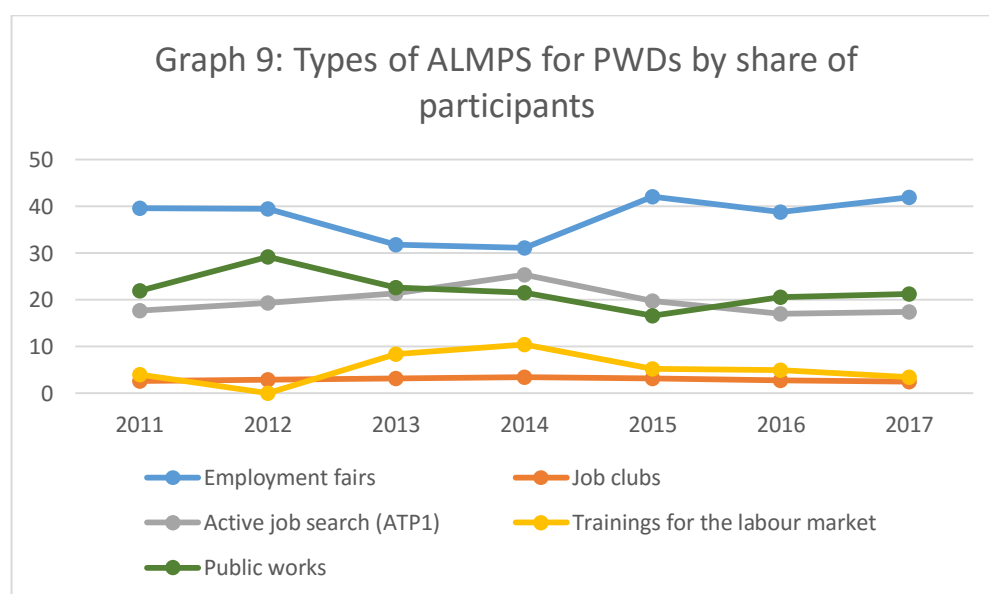
Source: NES

As Graph 7 clearly shows, the highest share of the total funds spent on ALMPs are invested in programmes for enhancing employment of PWDs. Dominating type of programme within this group is Public works, with between one and two thousands of involved PWDs in the period from 2011 till 2017 (see graph 8). Apart from it, subsidies for salaries of PWDs without work experience have involved a few hundreds of participating PWDs annually, while other programs engaged much less participants in the observed period.



Source: NES

In summary, by their subsequent shares in the total number of involved PWDs for the last seven years, Employment fairs have remained the most frequently delivered type of ALMPs through NES with about 40% of all PWDs involved. The next two most frequently delivered types of ALMPs for PWDs are Public Works and Active job search trainings (ATP1) with around 20% and 17% share of participants, respectively. Trainings for the labour market and Job clubs involved rather small shares of participants (around 3% each as of 2017). Graph 9 below shows the trends of delivery of the five types of programmes most frequently delivered at PWDs since the Fund has been established in accordance with the Law on professional rehabilitation and employment of PWDs. As can be noted, with a few exceptions (e.g. increase of Public Works in 2012 at 29% of involved PWDs, decrease of Employment Fairs at 31% of involved PWDs and increase of Active job search (ATP1) and Trainings for the labour market at 25% and 10% of involved PWDs respectively in 2014) the sequence of programmes and the shares of participants remained almost the same over the observed period.



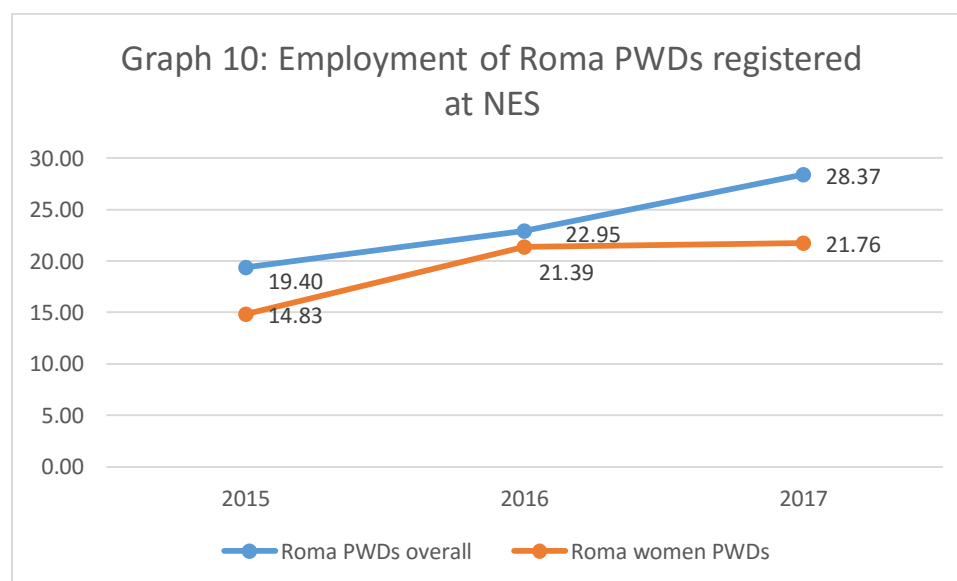
Source: NES

ALMPs for PWDs belonging to Roma minority

Based on their vulnerable position on the labour market affected not only by generally lower capacities of performing jobs, but also by lower qualifications and longer unemployment spell PWDs have been acknowledged status of hard-to-employ population and thus offered additional support by respective institutions to assure equal opportunities at the labour market. Hard-to-employ status has also been acknowledged to other disadvantaged groups, including women, young unemployed, long-term unemployed, unemployed with no/low qualifications and Roma. While PWDs are already disadvantaged by several criteria, i.e. longer unemployment spell, lower qualifications, women their additional vulnerability may come from belonging to Roma national minority. Unemployed Roma registered at NES are thus offered support measures based on individual employment plans and targeted for participation in available ALMPs. In such a

way non-discrimination and affirmative actions toward Roma PWDs have been assured and those registered at NES may be offered additional support on both basis – their established PWDs status and recognition of disadvantage derived from the Roma nationality.

Monitoring of their participation in ALMPs as well as evaluation of employment outcomes is based on segregated data on this vulnerable group available from the NES registry. According to the available data it is evident that 3.22% of all registered PWDs belong to Roma minority. The share of Roma PWDs in overall registered unemployed PWDs seems satisfactory taking into consideration overall representation of Roma minority in the total population in Serbia (2%, Census 2011)²⁵ as well as the share of registered PWDs among Roma population in Serbia. Namely, this minority group is not much different from the total population by the share of PWDs registered in Census 2011, where 7.8% of Roma reported obstacles in completing everyday activities due to an impairment vs. 7.9% of the total population²⁶. On the other hand, the share of persons with no/low qualifications within Roma PWDs registered at NES is much higher (75%) than for the overall unemployed PWDs registered at NES (39.35%) while the share of Roma women PWDs is rather low (30%). Participation of Roma PWDs in ALMPs remained relatively constant in number yet their employment measured as share of employed among registered unemployed Roma PWDs at NES substantially increased for both overall Roma PWDs and Roma women PWDs (graph 10).



Source: NES

Graph 10 clearly shows increasing trend in employment of Roma PWDs registered at NES likely to result from better targeting as well as monitoring and evaluation of effects of programs and measures directed at Roma PWDs. According to NES data for period 2015-2017, Roma PWDs

²⁵ According to the official Census 2011 data there are 147,604 (about 2%) persons belonging to the Roma minority in the Republic of Serbia. However, numerous researchers point out that the figure is underestimated as 450,000 persons or about 6% of total population in Serbia belong to Roma minority. For more details, please refer to: <http://www.euractiv.rs/srbija-i-eu/1362-procena-da-u-srbiji-ivi-oko-450000-roma>.

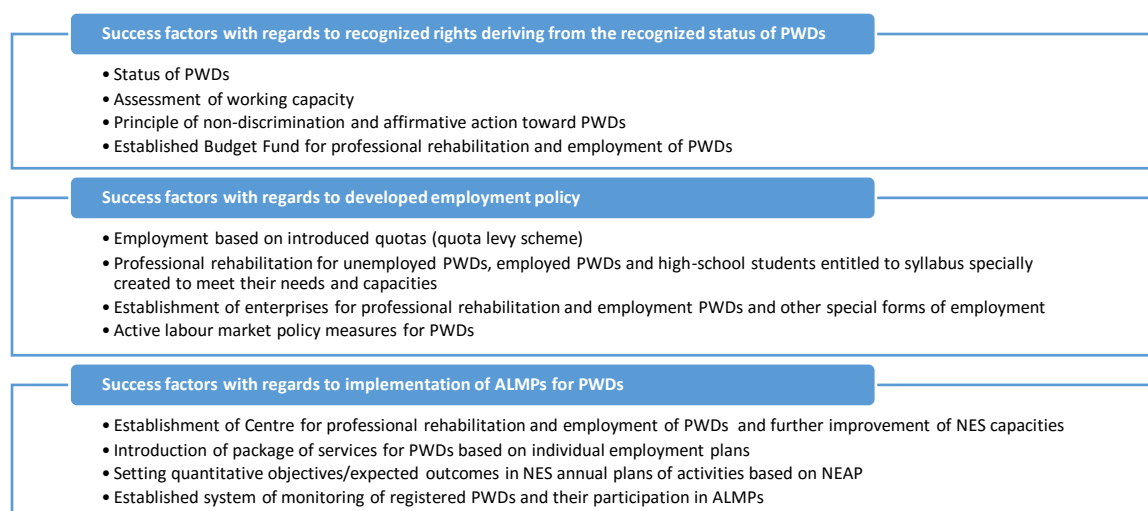
²⁶ Radovanović S., Knežević, A., Romi u Srbiji, Republički zavod za statistiku, Beograd, 2014.

mostly participated in Employment Fairs, Public Works, Motivational trainings for persons with no/low qualifications, and Trainings for active job search.

5. Success factors and transferability

The regulation with regards to professional rehabilitation and employment of PWDs and developed employment policies implemented over the last decade have undoubtedly contributed to higher participation of PWDs in ALMPs and offered new opportunities for their employment. Such a conclusion has been derived taking into consideration the number of registered PWDs at NES and the number of employed PWDs from the NES register over the period from 2011 till present. Both indicators have shown growing trends, though the Funds allocated and delivered through MoLEVSA and NES decreased over time. The core success factors are thus derived from the developed regulatory framework supporting the established employment policy as well as the mechanisms set to ensure its implementation (figure 2).

Figure 2: Success factors and transferability



As previously explained, the legal acts, by-laws and strategic papers with regards to employment of PWDs have been adjusted to the UN convention and developed in accordance with the EU regulations and standards. Successful practices from other EU countries have been transferred and adjusted to the local labour market conditions. On the other hand, some neighbouring countries have further developed their regulation based on the Law on professional rehabilitation and employment in Serbia. In conclusion, Serbian experiences with regards to regulation, employment policy and ALMPs may provide a valuable input to policy makers in other countries while developing regulation and employment policy in the field of professional rehabilitation and employment of PWDs. While the level of transferability may depend on the local conditions, the main success factors and the caveats (i.e. lessons learned listed further in the text) could undoubtedly contribute to development of a more effective employment policies and programmes.

Most important success factors stem from **the recognition of rights to work and employment and assuring equal opportunities for PWDs based on recognized status of PWDs and assessment of capacities**. Namely, prior to enforcement of the Law assessment of capacities of those with acquired disability from work as well as other PWDs was primarily based on medical criteria, without taking into consideration the social definition of disability. Focusing on disability to perform particular job rather than ability to work prevailed. Further integration of PWDs and their increased participation in the labour market improved by enforcement of the new Law based on the non-discrimination principle and undertaking affirmative action toward PWDs as well as establishment of the Budget Fund for professional rehabilitation and employment of PWDs.

Additionally, success factors are also related with the **developed four pillars of employment policy**, including: employment of PWDs based on binding quotas, professional rehabilitation for unemployed PWDs, employed PWDs and high-school students entitled to syllabi specially created to meet their needs and capacities, establishment of enterprises for professional rehabilitation and employment of PWDs as well as other special forms of employment of PWDs and active labour market policy measures for PWDs. Following the experiences from other EU countries, the employment policy directed at PWDs in Serbia envisaged introduction of quota levy scheme. Such a scheme imposed binding obligation on employers to employ PWDs while offering other options to get exemption from the obligation through supporting employment of PWDs by participating in their monthly salaries paid from the Budget Fund and/or arranging procurement contracts with enterprises for employment and professional rehabilitation of PWDs.

Success factors are also closely connected with **proper implementation of ALMPs for PWDs through NES**. Established Centre for professional rehabilitation and employment of PWDs followed by appointing counselors for employment of PWDs in all NES branch offices as well as establishment of Department for professional rehabilitation and employment of PWDs in NES Head Office contributed to improved delivery of services, including individual and group counselling, provision of information, trainings, career guidance and counselling. Better targeting of programmes was assured through developed package of services for PWDs, based on individual employment plans agreed upon between NES counsellor and registered client. Yet among the most important success factors was also setting quantitative objectives and planned outcomes within National Employment Action Plans as well as NES annual plans of activities. Paired with properly developed unique information system (JIS) it allowed timely and precise monitoring and evaluation of ALMPs as well as undertaking of corrective actions to improve future planning of programmes directed at PWDs.

6. Lessons learned and recommendations

Positive impact of the implemented employment policy toward PWDs over the last seven years is indisputable, yet certain problems still remain. While some of these are structural, other problems are more related with existing gap in attitudes and interest with regards to employment of PWDs on the demand and supply side of the labour market.

Structural problems stem from generally weak economy and unfavourable labour market conditions, including low economic activity, lack of investments, low creation of jobs, high

unemployment as well as long-term unemployment leading to further deterioration of already low competences and skills of PWDs in combination with obsolete educational programmes not adjusted to the needs of the labour market. Structural problems have mostly challenged successful implementation of employment policies for PWDs over the observed period, however other challenges appeared with regards to existing ignorance of employers, negative stereotypes with regards to PWDs but also their lack of interest to stay active. Namely, employers are often not well informed about capabilities of PWDs to perform jobs with the same productivity and sometime even more productively than persons without disabilities performing the same job. This reflects mostly on the lack of employers' willingness to adhere to the obligation to employ PWDs in accordance with the Law. On the other hand, many PWDs are often more interested in applying for retirement than retaining their jobs or actively seeking for jobs which then negatively reflects on their participation in ALMPs. Improvements could be made through putting more emphasis on educational campaigns, promotion of social dialogue and social responsibility.

In consequence, further development and implementation of employment policy for PWDs must take into consideration a number of appearing caveats. Some of the most important are as follows:

1. PWDs still represent an unknown segment of potential employees to employers who may not be familiar with their real abilities and strong motivation to work. Therefore, employers may often show resistance to engaging PWDs focusing on their potentially lower capabilities rather than on their competencies to perform a job.
2. It seems that though the regulatory framework has been developed based on social approach in defining disability, purely medical approach has prevailed in public discourse as well as among employers. Educational campaigns need to be initiated through mass media to change focus from health issues to social barriers creating obstacles to performing a job. The viewpoint has to be changed from problems related with health conditions of PWDs (e.g. moving in wheelchairs) to problems caused by inadequate conditions within the environment (e.g. no elevator). In the same manner, campaigns should address PWDs and rise their motivation for active search of jobs.
3. Employers may find obligation to employ PWDs unacceptable especially if they have to employ more than one PWD depending on the number of their employees, calling the attention to at least two arguments - non-existent need for additional workers and non-existent eligible candidates for jobs. The latter is typical for smaller regional labour markets where not many PWDs with adequate abilities and competences may be available, whereas labour mobility of PWDs from other regional labour markets is generally very low.
4. Employers are generally not well informed about the possibilities to be exempted from the obligation to employ PWDs. Therefore, should it be decided to keep the quota levy scheme, relevant ministries, public employment services and other social partners (e.g. trade unions, associations of employers, civil sector etc) would need to initiate and implement an information campaign to educate employers on all other possibilities to support employment of PWDs other than hiring them according to set quotas. In addition, should the primary aim be to enhance employment of PWDs with reduced working capacities (employment under special conditions) introduction of additional mechanism

and/or incentives to motivate employers to employ them (e.g. employment of one PWDs with substantially reduced working capacities would equal two employed PWDs according to quota scheme).

5. Modalities of fulfilling the obligation to employ PWDs may not be adequate for all employers and/or all market conditions and thus would need to be readjusted to better suit the interests of various parties. Namely, the exemption from the obligation to employ one PWD by setting procurement agreement with enterprises for professional rehabilitation and employment amounting at 20 average incomes in the Republic of Serbia might be acceptable for bigger enterprises, but it often exceeds the needs for purchasing goods and services of smaller enterprises leaving them with little options for fulfilment of the binding obligation imposed by the Law.
6. Social dialogue makes one of the main prerequisites for successful implementation of employment policy as the most effective way of assuring protection of rights of employed and unemployed PWDs at the best interest of employers. Policies and interventions agreed upon in social dialogue involving all interested parties are more likely to be accepted and fully implemented. It also contributes to introducing higher transparency in the whole process which may of crucial importance particularly where quota levy scheme has been introduced.
7. Social responsibility may still not been widely accepted by employers and should thus be further promoted. Therefore, instead of enforcing obligations and sanctions (e.g. penalties for not fulfilling the binding obligations) it is worth trying to implement more positive approach, including recognition and public promotion of socially responsible employers, exemption from taxes and similar measures.
8. Monitoring of implementation of employment policy toward PWDs is limited by lack of statistical data which makes one of the most severe caveats for successful implementation of employment policy. Apart from the data available from the NES registry, official statistics with regards to PWDs would need to improve allowing more information on the size and structure of this vulnerable group, including their employment/unemployment status. It is worth considering creation and use of instruments (i.e. questions to be integrated within questionnaires developed for the purposes of LSF/SILC/Census) to allow deeper analysis of overall position of PWDs and improvements made through implemented policies.

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