
Recommendations for anti-discrimination policy in Croatia

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1. **Ensuring the effective implementation of anti-discrimination legislation**
 - 1.1. **Strengthening the capacity of the judiciary to apply anti-discrimination law**

Introduce mandatory, continuous, and specialized training for judges, state attorneys, and lawyers in the field of anti-discrimination law, with particular emphasis on the proper application of the burden of proof, understanding direct and indirect discrimination, multiple and intersectional discrimination, standards of domestic and European law, as well as the case law of national courts, the Court of Justice of the European Union, and the European Court of Human Rights. Such training should be ensured as a permanent component of professional development, with stable funding from the state budget, independent of project-based funding.
 - 1.2. **Establishing specialization within the judiciary for anti-discrimination cases and hate crimes**

Develop specialized court departments, specialized divisions, or at least permanent contact points for anti-discrimination and hate crime cases in order to improve the quality of decision-making, legal certainty, and consistency of case law. At the same time, it is necessary to prescribe that only those judges and state attorneys who have completed appropriate training in domestic and European anti-discrimination legislation may handle anti-discrimination proceedings and hate crime cases.
 - 1.3. **Ensuring real accessibility of free legal aid in discrimination cases**

Provide sufficient and predictable funding for the implementation of the Free Legal Aid Act to ensure that citizens of lower economic status have a real, not merely formal, possibility of judicial protection. This includes covering the costs of legal representation throughout the entire procedure, as well as adapting the system to the actual needs of victims of discrimination, especially in complex and lengthy proceedings.
 - 1.4. **Improving a comprehensive system for monitoring anti-discrimination court proceedings and case law**

Improve an up-to-date, standardized, and mutually comparable system for monitoring all court and related proceedings in the field of discrimination. The system should include data on the grounds of discrimination, the area in which discrimination occurred, the type and status of the perpetrator,

the gender and age of the victim, possible multiple discrimination, and other relevant case characteristics. It is also necessary to anonymize and publish all judgments in anti-discrimination proceedings and hate crime cases in a unified, publicly accessible, and searchable database, categorized by grounds of discrimination, field, type of perpetrator, and other relevant parameters.

1.5. Ensuring financial and procedural preconditions for strategic litigation

Provide stable and predictable sources of funding for civil society organizations to encourage strategic litigation, including joint legal action, as an important mechanism for the development of case law and the protection of the rights of groups exposed to discrimination. At the same time, it is necessary to reduce risks for claimants by limiting procedural costs, expanding access to free legal aid, and establishing mechanisms that mitigate the deterrent effect of high costs and procedural uncertainty.

1.6. Reducing the duration of anti-discrimination court proceedings

Shorten the duration of court proceedings in anti-discrimination cases by introducing prioritization in handling, reasonable deadlines for procedural actions, and more efficient case management. This would reduce the deterrent effect of lengthy proceedings on victims of discrimination and increase the effectiveness and accessibility of legal protection.

1.7. Harmonizing and strengthening sanctions for discrimination

Ensure more consistent and stricter sanctioning of perpetrators of discrimination by adopting clearer guidelines for courts and other competent authorities, particularly with regard to limiting the overly frequent application of sentence mitigation and suspended sentences. Sanctions should be effective, proportionate, and dissuasive, in order to strengthen the preventive effect of the law and send a clear social message about the unacceptability of discrimination.

1.8. Consistently investigating and prosecuting hate speech and public incitement to hatred

Ensure consistent, proactive, and effective investigation and prosecution of all forms of hate speech and public incitement to hatred, with a clear distinction between the limits of freedom of expression and punishable forms of incitement to discrimination, hostility, and violence. It is necessary to strengthen coordination between the police, state attorney's office, and courts in order to prevent selective or passive application of the law.

2. Improving the strategic framework for combating discrimination

2.1. Making the development of strategic documents more transparent and inclusive

Improve the process of drafting strategic documents through greater transparency, timely public information, and early and meaningful participation of relevant stakeholders, including civil society organizations, ombudsperson institutions, the expert community, and representatives of vulnerable groups. It is necessary to reduce administrative delays and interruptions caused by political changes and to ensure that changes in government do not lead to multi-year delays in the adoption or implementation of key policies.

2.2. Ensuring continuity of action plans and implementation

Ensure the continuity of adopting action plans and their timely implementation, without multi-year gaps between two planning periods. Strategic documents and action plans must follow one another in a way that ensures anti-discrimination policies are implemented continuously, rather than occasionally and discontinuously.

2.3. Introducing regular monitoring and evaluation of strategic documents

Regularly monitor implementation and evaluate the impact of key strategic documents upon their expiry, and where possible also at the mid-point of the implementation period. The findings of monitoring and evaluation should be clearly, publicly, and methodologically consistently linked to the development of new strategic documents, in order to avoid repeating the same shortcomings and to enable learning from previous implementation.

2.4. Substantively strengthening strategic documents in relation to vulnerable groups

Strategic documents should be substantively strengthened by defining concrete, targeted, and implementable measures for specific vulnerable groups, including LGBTIQ persons and other groups exposed to discrimination. For each measure, it is necessary to clearly define deadlines, responsible bodies, sources of funding, and measurable indicators of implementation and impact, in order to enable high-quality monitoring and evaluation of the actual results of anti-discrimination policies.

- 3. Improving the institutional framework and capacities for the implementation of anti-discrimination policy**
- 3.1. Strengthening the capacities of key executive branch institutions**

Strengthen the human and financial capacities of key executive institutions, in particular the Office for Human Rights and the Rights of National Minorities and the Office for Gender Equality, by increasing staffing levels, reinforcing expert teams, and ensuring more stable budgetary funding. It is necessary to ensure that these institutions have sufficient personnel and resources for policy coordination, monitoring implementation, analytical work, and intersectoral cooperation.
- 3.2. Increasing the autonomy and professional influence of officials in competent offices**

Ensure greater autonomy for experienced and expert officials within competent offices and strengthen their role in raising awareness among decision-makers on issues of human rights, equality, and non-discrimination. This would reinforce institutional memory and reduce dependence on political changes.
- 3.3. Institutionalizing the work of coordination bodies at a high political level**

Institutionalize and ensure the continuity of coordination bodies at a high political level, such as the Human Rights Council, with clearly defined mandates, composition, competences, and an obligation to meet regularly. It is necessary to prevent their work from depending on current political will and to ensure long-term coordination and strategic management of human rights policies.
- 3.4. Ensuring the timely implementation of recommendations by ombudsperson institutions**

Ensure the timely implementation of recommendations issued by ombudsperson institutions and that public authorities respond to them seriously, substantively, and within reasonable timeframes. It is necessary to strengthen accountability mechanisms for failure to act on recommendations, particularly where such failures are repeated year after year.

3.5. Ensuring timely and complete submission of data to ombudsperson institutions

Ensure the timely, complete, and comparable submission of data to ombudsperson institutions by public authorities, including the possibility of sanctioning non-compliance with legal obligations to provide data. Without reliable data, it is not possible to effectively monitor the situation, identify problems, or formulate effective recommendations.

3.6. Reforming parliamentary oversight of the anti-discrimination protection system

Reform parliamentary oversight of the anti-discrimination protection system by introducing an obligation for timely and substantive debate on ombudsperson reports, as well as strengthening their political visibility. It is necessary to ensure that the findings and recommendations of these institutions are systematically considered in the Croatian Parliament and have a more visible impact on public policies and legislative initiatives.

3.7. Establishing stable funding models for civil society organizations

Establish stable and predictable funding models for civil society organizations that go beyond an exclusively project-based approach, particularly for activities such as legal aid, strategic litigation, advocacy, policy monitoring, public information, and education. Such organizations often perform key functions within the anti-discrimination protection system, but without institutional stability they cannot plan their work in the long term.

3.8. Ensuring genuine inclusion of civil society organizations in decision-making

Ensure their genuine, rather than merely formal, inclusion in decision-making processes, including an obligation to provide reasons when their proposals are not accepted. Consultations should be timely, substantive, and structured in a way that influences final decisions, rather than being reduced to a mere formality.

3.9. Improving the structure and functioning of intersectoral bodies and working groups

Improve the structure and functioning of intersectoral bodies and working groups through clearer membership criteria, defined expert profiles required for participation, more clearly delineated competences, and more operational working formats. This would reduce system fragmentation and increase the effectiveness of coordination among different actors in the field of combating discrimination.

3.10. **Establishing a unified system for financial planning and monitoring of anti-discrimination policies**

Establish a unified and transparent system for financial planning and monitoring of anti-discrimination policies that enables linking specific measures with corresponding budget lines and their outcomes. This includes the development of program-based budgeting by “policy clusters” and digital tools that would enable timely and precise tracking of allocations and expenditure across different sectors and levels of government.

3.11. **Ensuring more stable and adequate funding for civil society organizations, including the costs of strategic litigation**

Ensure more stable and adequate funding for civil society organizations, including long-term funding programmes for activities such as advocacy, free legal aid, and strategic litigation. It is necessary to adapt existing EU funding models or establish national mechanisms that would cover the costs of strategic court proceedings, thereby strengthening the implementation of anti-discrimination legislation.

3.12. **Promoting training for state and local officials on anti-discrimination legislation**

Systematically encourage state and local officials to participate in training on anti-discrimination legislation, including training provided by the State School for Public Administration, in order to ensure more consistent application of equal treatment standards in the day-to-day work of public administration.

4. Improving education and preventing discrimination through combating prejudice against discriminated groups

4.1. Ensuring systematic training of education professionals

Ensure systematic training for teachers, early childhood educators, and professional staff in preschool institutions and schools on the obligations arising from anti-discrimination legislation, as well as on methods for reducing prejudice, preventing stereotypes, and building an inclusive educational environment. Such training should be part of both initial education and continuous professional development.

4.2. Systematically implementing civic and health education

Systematically implement civic and health education at all levels of education, in line with scientific knowledge, human rights principles, and the values of equality, dignity, and solidarity. It is particularly important to ensure that content related to discrimination, diversity, and equality is genuinely present in educational practice, rather than merely formally prescribed.

4.3. Conducting public campaigns and research to reduce prejudice

Conduct public opinion research, well-designed campaigns, and other activities aimed at raising awareness among the general population about the position, rights, and needs of discriminated groups. In the public sphere, it is necessary to actively promote the values of equality, equal treatment, and solidarity, and to consistently oppose the normalization of stereotypes, stigmatization, and exclusion.

5. **Combating discrimination on the grounds of sex**
 - 5.1. **Ensuring consistent and rigorous application of criminal law in cases of gender-based violence**

Ensure a more consistent, stricter, and gender-sensitive application of the Criminal Code in cases of gender-based violence, domestic violence, and femicide, with clearer recognition of the gender dimension of violence and greater emphasis on victim protection and the deterrent effect of sanctions.
 - 5.2. **Improving the conduct of courts, police, and the social welfare system**

Improve coordinated, timely, and victim-centered responses by courts, police, and the social welfare system in cases of violence against women, including standardized risk assessment, urgency in action, and better institutional coordination.
 - 5.3. **Providing systematic and continuous training for all involved services**

Systematically and continuously raise awareness and provide training for all services involved in responding to gender-based violence, including the police, judiciary, social welfare centers, healthcare system, and educational institutions, in order to reduce secondary victimization and improve the quality of protection.
 - 5.4. **Ensuring prevention as well as consistent recording and evaluation of violence cases**

Ensure systematic data collection, consistent record-keeping, and regular evaluation of cases of gender-based violence, including comparable data across institutions and monitoring of outcomes. Prevention must also include the analysis of patterns of violence, risk factors, and institutional shortcomings.
 - 5.5. **Adopting a protocol for femicide investigations and a risk management system**

Adopt a specific protocol for femicide investigations and develop a comprehensive system for assessing and managing risks of femicide and gender-based violence, with clear rules for inter-institutional information sharing and timely action.
 - 5.6. **Increasing the capacity of specialized shelters**

Increase the capacity of specialized shelters for women victims of violence and their children, ensuring their territorial accessibility, stable funding,

and responsiveness to the needs of women in different life situations, including women with disabilities and other multiply vulnerable groups.

5.7. Strengthening educational programmes on gender equality and sex education

Establish and strengthen educational programmes for children and young people on gender equality, gender-based violence, non-violent relationships, and sex education, based on scientific knowledge and human rights principles.

5.8. Increasing sanctions for political parties that fail to comply with gender quotas

Increase sanctions for political parties that fail to comply with prescribed quotas in candidate lists to a level that creates real financial disincentives for non-compliance and encourages the serious implementation of rules on equal representation.

5.9. Ensuring equal access to reproductive rights and services

Ensure equal and genuinely accessible access to healthcare in the field of reproductive rights, including the right to legal abortion and access to contraception, without territorial, financial, or institutional discrimination.

5.10. Regulating conscientious objection of gynecologists in the public healthcare system

Regulate conscientious objection of gynecologists in public healthcare institutions in a way that establishes a balance between the individual's right to act according to conscience and the state's obligation to ensure real and timely access to legally guaranteed healthcare services, without discrimination or territorial disparities.

5.11. Regulating conscientious objection of pharmacists

Regulate conscientious objection of pharmacists in public and contracted pharmacies within the Croatian Health Insurance Fund system in a manner that ensures the availability of legally prescribed medicines and contraceptives to all citizens, without barriers or denial of care.

5.12. Ratifying ILO Convention No. 190

Ratify the International Labour Organization Convention No. 190 on Violence and Harassment in the World of Work and ensure its implementation within the legislative and institutional framework.

- 6. Combating discrimination on the grounds of sexual orientation, gender identity, and expression**
- 6.1. Accelerating decision-making and procedures related to the rights of transgender persons**
- Accelerate the work of the National Health Council and other competent bodies to ensure that transgender persons can exercise their rights in accordance with their chosen gender identity in a timely manner and without unnecessary administrative barriers.
- 6.2. Regulating coverage of medical transition costs and availability of procedures**
- Introduce clear, transparent, and publicly accessible rules within the Croatian Health Insurance Fund regarding coverage of medical transition costs, including criteria, procedures, and scope of rights, and enable the provision of necessary procedures and medical services within Croatia in order to avoid the financial and health burden on individuals who are currently often referred abroad.
- 6.3. Ensuring local support centres for LGBTIQ youth**
- In cooperation with civil society organizations and educational institutions, ensure the funding and establishment of support centres for LGBTIQ youth at the local level, including psychosocial support, counselling, peer support, and safe spaces.
- 6.4. Ensuring consistent implementation of the Life Partnership Act**
- Ensure higher-quality and more consistent implementation of the Life Partnership Act for same-sex couples by aligning secondary legislation, administrative practices, and the conduct of competent authorities with the provisions of the Act, in order to remove barriers to the exercise of rights guaranteed by law.
- 6.5. Improving the recording of hate crimes and intersectoral cooperation**
- Establish improved record-keeping by the Ministry of the Interior and the State Attorney's Office on hate crimes, including those motivated by sexual orientation, gender identity, and gender expression, and strengthen intersectoral cooperation to ensure more consistent recognition, reporting, recording, and prosecution of such offences.

6.6. Including specific measures for LGBTIQ equality in strategic documents

Adopt a dedicated strategic document on LGBTIQ equality or, alternatively, include a specific, detailed, and implementable set of measures for LGBTIQ+ equality within existing strategies and action plans, in line with relevant European standards and the European Union's strategic framework for the period 2026–2030.

- 7. Combating discrimination on the grounds of ethnic identity, race, skin colour, and nationality**
- 7.1. Increasing awareness among national minorities about rights guaranteed by the Constitutional Act**
- Increase awareness among members of national minorities about the rights guaranteed by the Constitutional Act on the Rights of National Minorities, with particular emphasis on Article 22 and the possibilities of exercising rights in employment under special conditions, including the obligation to declare nationality when candidates invoke special minority quotas.
- 7.2. Introducing sanctions for non-compliance with provisions on the employment of minorities**
- Prescribe effective sanctions for non-compliance with Article 22, following the model of existing sanctions for failure to comply with quotas in the employment of persons with disabilities and Croatian war veterans, in order to ensure that the right to preferential employment becomes genuinely enforceable rather than merely declaratory.
- 7.3. Strengthening the capacities of national minority councils**
- Strengthen the financial and operational capacities of national minority councils at local and regional level for effective anti-discrimination work and the implementation of minority rights activities, including training on minority rights, anti-discrimination legislation, and protection mechanisms.
- 7.4. Amending and consistently applying regulations on minority languages and scripts**
- Amend the Act on the Use of Languages and Scripts of National Minorities and ensure its consistent implementation throughout the territory of the Republic of Croatia, without selective or politically conditioned enforcement.
- 7.5. Abolishing segregated Roma classes and ensuring inclusive education for Roma children**
- Abolish segregated Roma classes and ensure inclusive, high-quality, and non-discriminatory education for Roma children, including support for their integration into mainstream education programmes, language and professional support, and measures to prevent institutional segregation.

- 7.6. **Investing in housing conditions of the Roma population and desegregation of housing**
- Invest in improving the housing conditions of the Roma population and implement measures for the gradual desegregation of housing, in coordination with housing, education, social, and local policies in order to reduce spatial isolation and its consequences.
- 7.7. **Providing training on minority rights and anti-discrimination obligations**
- Implement awareness-raising measures on the rights of Roma, Serbs, and other minorities, as well as migrant groups, and provide broad and continuous training on anti-discrimination obligations for landlords, employers, public officials, and other relevant groups.
- 7.8. **Conducting campaigns to reduce social distance and prejudice**
- Conduct campaigns and educational activities aimed at reducing social distance and prejudice towards national minorities and minority groups within the general population, particularly among children and young people, in order to reduce the long-term social acceptability of discrimination.
- 7.9. **Organizing Croatian language courses for refugees and other migrants**
- Organize accessible and sufficiently widespread Croatian language courses for refugees and other migrants in order to facilitate their integration, education, access to public services, and employment.
- 7.10. **Timely and clear public condemnation and judicial sanctioning of violence, hate speech, and harassment against minorities**
- To timely, clearly, and at the highest political and institutional level publicly condemn and sanction violence against minorities, hate crimes, hate speech, and other forms of public harassment targeting the Serbian and other national minorities, as well as their organizations. Such condemnation must be consistent rather than selective in order to achieve a preventive and symbolic effect. Unacceptable Ustaša-related terminology and symbols should be more strictly sanctioned, and public awareness should be raised regarding the unacceptability of hate speech arising from the so-called “dual connotation.”
- 7.11. **Adopting a comprehensive and high-quality migration and integration strategy**
- Adopt a migration and integration strategy with clearly defined objectives, measures, and activities, as well as concrete implementation and impact

indicators, which applies to all persons of migrant origin, regardless of the ways in which their status is regulated, as well as measures aimed at raising awareness among the local population in order to reduce racist and nationalist attitudes and hate speech. This includes, among others, applicants for international and temporary protection, persons granted such protection, and migrant workers.

7.12. Protection of the labor rights of migrant workers

Ensure, in a timely and clear manner and at the highest political and institutional level, the effective protection of the labor rights of migrant workers, including the right to decent working conditions, fair remuneration, workplace safety, and access to legal protection. It is necessary to consistently monitor employers and employment intermediaries and to sanction all forms of exploitation, discrimination, and violations of labor legislation. Special attention should be given to informing migrant workers about their rights and available protection mechanisms, as well as to removing administrative and language barriers in exercising those rights. Furthermore, interinstitutional cooperation should be improved to ensure effective enforcement of regulations and the prevention of abuses.

8. **Combating discrimination on the ground of disability**

8.1. **Establish a unified, cross-sector disability assessment system**

Establish a unified, cross-sector disability assessment system based on the biopsychosocial model, instead of fragmented and sector-specific assessment models. The system should enable functional recognition of status for persons coming from other EU Member States, third countries, as well as migrants, returnees, seasonal workers, and refugees, without unnecessary reassessments. It should be aligned with EU practices and standards, the Convention on the Rights of Persons with Disabilities, and relevant guidelines for crisis and cross-border situations.

8.2. **Reform the legal capacity system and introduce supported decision-making**

Replace the system of full or broad deprivation of legal capacity with a supported decision-making model based on autonomy, equality, and respect for the individual's will. To this end, relevant laws should be amended and professionals in social care, the judiciary, and healthcare should be trained to implement a model that does not exclude individuals from making decisions about their own lives.

8.3. **Ensure personal assistance as a universal public service**

Ensure a universal, permanently funded, and geographically evenly accessible system of personal assistance as a public service, where the scope of support is determined according to the specific needs and life aspirations of each person with disabilities, regardless of the type of disability, age, or formal status. The system should include multiple forms of support for persons with complex needs and those living in rural and less accessible areas. A sustainable model for training, employment, and retention of necessary staff should be established, with adequate budgetary resources beyond EU funds and in cooperation with local and regional self-government units.

8.4. **Strengthen inclusive education and support for independent living**

Strengthen institutional support for inclusive education at all stages, from early development to higher education. This includes stable funding for teaching assistants, teacher training, social and peer mentoring, quality monitoring, and support mechanisms for employment and independent living after education, with an emphasis on supported housing. It is necessary to revise programs of special education institutions, improve

their integration with mainstream kindergartens and schools, and ensure systematic support for students with disabilities within university systems. It is also necessary to systematically increase the number of professional staff in the education system and related social care and healthcare systems to ensure truly inclusive education.

8.5. **Develop supported employment measures and protection of labor rights**

Systematically develop measures that enable persons with disabilities to access the labor market, including supported employment, workplace accommodations, a sufficient number of job assistants and trainers, support for self-employment, accessible legal protection in cases of discrimination, and strengthened labor inspections of employers.

8.6. **Implement deinstitutionalization and develop community-based services**

Ensure all necessary resources, monitor implementation, and conduct a comprehensive evaluation of the National Plan for the Development of Social Services and the Operational Plan for Deinstitutionalization. For the upcoming period, a unified National Plan for the Development of Community-Based Services and Deinstitutionalization should be adopted, covering all types of providers and priority services, and providing for investments in staff, quality, integration, and sustainability at the local level. The planned Operational Plan for Long-Term Care should emphasize home- and community-based care and horizontal and vertical integration of health and social services, and in the next planning cycle be integrated with the development of social and health services and deinstitutionalization into a single strategic package of measures.

8.7. **Ensure accessibility in all dimensions**

Consistently apply standards of reasonable accommodation and universal design in all public spaces, transport, digital services, education, and healthcare. Mechanisms for monitoring and sanctioning non-compliance with accessibility standards should be established, and persons with disabilities should be involved in the design, testing, and evaluation of accessible solutions. Programs of technical assistance for the public, non-profit, and business sectors should also be launched to accelerate the adaptation of Croatia's digital space to the European Accessibility Act.

8.8. **Strengthen protection from violence, crisis preparedness, and system sensitivity**

Ensure specialized mechanisms for preventing and responding to violence against persons with disabilities, including women, children, and older persons with disabilities. This includes risk assessment protocols in families and institutions, accessible reporting mechanisms, enhanced oversight, and tailored interventions. Inclusive crisis protocols should be developed for situations such as earthquakes, pandemics, and other crises, ensuring accessible assessment capacities and support in emergencies, and

urgently adapting shelters for victims of violence, especially for women with disabilities and children with developmental difficulties. All of this is necessary to ensure more consistent implementation of obligations under the Convention on the Rights of Persons with Disabilities, the Istanbul Convention, GREVIO recommendations, and the concluding observations of the UN Committee on the Rights of Persons with Disabilities.

8.9. **Reform financing of services and organizations of persons with disabilities**

Reform the financing of social services and civil society organizations by introducing multi-year contracts, realistic pricing, institutional support for core activities, and recognition of organizations of persons with disabilities as equal service providers. This ensures stability, staff development, and high-quality support for users.

8.10. **Ensure participation of persons with disabilities and change the public narrative**

Include persons with disabilities and their organizations in all stages of the design, implementation, and evaluation of public policies. Ensure accessibility of polling stations and political materials, and shift public discourse from a framework of charity and humanitarian approaches to one based on equality, dignity, and civil rights.

9. **Combating discrimination on the ground of health status and within the healthcare system**
 - 9.1. **Ensure equal territorial access to healthcare services**
 Ensure equal access to healthcare services across all regions of Croatia, including specialist examinations in every county, in order to reduce territorial inequalities in access to healthcare.
 - 9.2. **Introduce incentives for employing healthcare workers in underserved areas**
 Introduce incentive-based models for the employment and retention of healthcare workers on islands, in rural and less developed areas, including financial, housing, and career-related incentives.
 - 9.3. **Strengthen telemedicine and remote specialist consultations**
 Strengthen the telemedicine system so that patients, especially those from remote areas, can access specialist consultations without the need for frequent and costly travel.
 - 9.4. **Ensure transport and reimbursement of travel costs for patients from rural areas**
 Ensure effective public transport for patients from rural and less connected areas to hospitals and health centers, and provide reimbursement of travel costs when public transport is unavailable or unsuitable for the patient's health condition.
 - 9.5. **Establish full integration and digitalization of the healthcare system**
 Ensure full integration and digitalization of the healthcare system so that physicians at all levels of care, including emergency services, have timely, secure, and functional access to patients' medical records. This would enable higher-quality and more efficient multidisciplinary care, reduce administrative burden, and improve continuity of care.
 - 9.6. **Make waiting lists transparent and comparable**
 Establish publicly available, up-to-date, and transparent waiting lists by hospital, institution, and type of procedure, allowing patients to compare service availability and realistically plan their treatment.

- 9.7. **Introduce a standardized prioritization system**
Introduce a standardized prioritization system for urgent, oncological, chronic, and other time-sensitive cases in order to reduce arbitrariness in scheduling and ensure a fairer allocation of appointments.
- 9.8. **Continue digitalization of appointment systems and improve e-Booking**
Continue the digitalization of appointment systems and improve e-Booking to make it more user-friendly, functional, and accessible to citizens with different levels of digital literacy.
- 9.9. **Increase the capacity of secondary and tertiary healthcare**
Increase the capacity of secondary and tertiary healthcare to reduce waiting lists, relieve overburdened institutions, and ensure access to more complex diagnostic and therapeutic procedures.
- 9.10. **Systematically implement hospital accreditation and publish results**
Systematically implement hospital accreditation in accordance with the existing legal framework, with clear quality standards, regular external evaluations, and public disclosure of results, in order to harmonize the quality of healthcare and strengthen system governance.
- 9.11. **Strengthen primary healthcare, prevention, and palliative care**
Strengthen primary healthcare by increasing the capacity and availability of family physicians, pediatricians, and gynecologists, and by expanding their competencies. Increase investment in preventive programs, particularly in the areas of chronic and rare diseases, as well as in treatment and rehabilitation. Develop a palliative care system through mobile teams, day centers, and family support, and prioritize investment in health centers and local healthcare facilities, alongside greater decentralization of decision-making.
- 9.12. **Ensure financial fairness and access to therapies**
Increase overall public healthcare spending to levels comparable with the EU average and improve financial management by better utilizing various funding sources, including sectoral budgets, the Croatian Health Insurance Fund, local and regional governments, EU funds, and bilateral mechanisms. At the same time, ensure access to medical services and therapies by introducing clear criteria for the availability of medicines and treatments, revising supplementary health insurance to make it accessible to low-income citizens, and providing free supplementary insurance for socially vulnerable groups. Equal access to expensive therapies must be

ensured regardless of financial status.

9.13. **Introduce continuous education of healthcare professionals on rights, intersectionality, and non-discrimination**

Introduce mandatory and continuous training for healthcare professionals on patients' rights, the prohibition of discrimination, intersectionality, and working with vulnerable groups, both within higher education and vocational programs and through lifelong professional development.

9.14. **Adapt healthcare institutions and ensure support for vulnerable groups**

Adapt healthcare infrastructure to persons with disabilities and other vulnerable groups, and introduce mediators, interpreters, and coordinators for working with Roma communities, migrants, and persons with disabilities. In addition, actively inform citizens about patients' rights and mechanisms for protection against discrimination and other violations of patient rights.

9.15. **Significantly increase investment in health literacy**

Significantly increase investment in health literacy, in cooperation with the Croatian Institute of Public Health, civil society organizations, schools, and the media. Develop inclusive public health campaigns with a participatory approach and connect the healthcare and education systems to better support children and young people with serious health conditions.

9.16. **Protect the rights of workers with chronic and mental conditions and regulate the relationship between health and work**

Introduce mandatory training for employers, labor inspectors, and the Croatian Employment Service on the rights of workers with chronic, mental, and other serious health conditions. Ensure effective oversight of dismissals, reorganizations, and other labor-related situations that negatively affect persons undergoing treatment or recovery, and include health protection and the prohibition of discrimination in collective agreements and internal labor regulations.

9.17. **Align legislation with the right to be forgotten and strengthen insurance market oversight**

Align national legislation with European standards on the right to be forgotten for persons who have recovered from certain illnesses and strengthen oversight of the insurance market by enhancing the role of the Croatian Financial Services Supervisory Agency. Ensure transparent

and reasoned decision-making by insurers, as well as effective rights to complaint and appeal for policyholders.

9.18. **Systematically involve patients and civil society organizations in health policies**

Systematically involve patients and civil society organizations in the design, implementation, and evaluation of health policies, as well as in discussions on healthcare system priorities.

9.19. **Establish a publicly accessible database of complaints and recommendations by patient rights bodies**

Ensure systematic compliance with the obligation of regular annual reporting by county committees and the Committee for the Promotion and Protection of Patients' Rights within the Ministry of Health, and establish a unified, publicly accessible, and searchable national database of their complaints, recommendations, and decisions. It is necessary to mandate the use of this data in the work of the executive and legislative branches, independent institutions, and scientific bodies.

9.20. **Regulate public health action in crisis situations based on human rights**

Introduce clear criteria for crisis measures that may limit human rights, based on scientific evidence, necessity, legality, non-discrimination, and time limitation. Crisis measures must be adopted in consultation with ombudspersons and human rights organizations, with timely, clear, and multi-channel communication to the public. It is necessary to ensure equal access to information, actively combat disinformation, guarantee access to justice for victims of human rights violations, protect media freedom, and safeguard space for civil society and human rights defenders. Vulnerable groups must be included in decision-making and impact assessment, and investments should be made in capacities for cross-sectoral crisis response, with active involvement and training of citizens.

- 10. Discrimination on the ground of age**
- 10.1. Establish systematic data collection and public reporting on age discrimination**
- Establish systematic collection, analysis, and public reporting of data on age discrimination, including multiple discrimination, and improve the accessibility and effectiveness of reporting mechanisms. Data should enable differentiation between the experiences of children, young people, and older persons, as well as identification of overlaps with other grounds of discrimination.
- 10.2. Establish a permanent cross-sector coordination mechanism for policies combating age discrimination**
- Establish a permanent cross-sector coordination mechanism for policies combating age discrimination, with a clear obligation to monitor implementation and report regularly, in order to avoid fragmentation between the education, labor, healthcare, and social welfare sectors.
- 10.3. Adopt and implement a workforce development plan in key systems**
- Adopt and implement a workforce development plan in healthcare, education, and social welfare, with a particular focus on shortage occupations and equal territorial access to services. Staff shortages particularly affect children, young people, and older persons in smaller communities.
- 10.4. Ensure equal access to and quality of preschool and school education**
- Ensure territorially equal access to and quality of preschool and school education, including professional support, material conditions, and inclusion of children from vulnerable groups.
- 10.5. Introduce mandatory training for education professionals on non-discrimination**
- Introduce mandatory training for education professionals on the prohibition of discrimination, different forms of exclusion, and appropriate responses, along with clear and enforceable protocols for handling cases of discrimination, violence, and harassment.

- 10.6. **Establish a nationwide early intervention system**
Establish and ensure the availability of early intervention services across all parts of Croatia, regardless of place of residence, so that children at developmental risk or with developmental difficulties and their families receive timely support.
- 10.7. **Ensure support services for children with disabilities and their families**
Ensure the availability of support services for children with disabilities and their families, including assistants, professional teams, rehabilitation services, and respite care, in order to reduce the burden on families and increase children's inclusion in the community.
- 10.8. **Develop preventive family support programs**
Develop and implement preventive family support programs to reduce the removal of children due to poverty and other socioeconomic reasons that can be addressed through community-based support.
- 10.9. **Develop coordinated measures for youth linking employment, housing, and mental health**
Develop and implement coordinated measures for young people that integrate employment, housing, access to public services, and mental health, in order to address interconnected barriers to social inclusion.
- 10.10. **Combat age discrimination and the misuse of insecure forms of work, and develop quality first employment and work-based learning programs**
Strengthen oversight and sanctioning of age discrimination in youth employment, including the misuse of insecure forms of work, fake internships, jobs without real prospects for advancement, and other forms of precarious work. Develop quality first employment and work-based learning programs that genuinely improve youth employability, rather than serving as short-term, low-paid substitutes for standard employment.
- 10.11. **Increase access to mental health services for young people**
Increase access to mental health services for young people within the education system and local communities, including counseling services, psychological support, and timely referrals to specialized services.
- 10.12. **Improve pension indexation and reduce poverty among older persons**
Amend the pension indexation formula to better reflect the rising cost of living and develop targeted measures to reduce poverty among older

persons, especially those living alone, older women, and persons with low pensions.

- 10.13. **Conduct an analysis of the situation of older persons for targeted policymaking**
 Conduct a comprehensive analysis of the situation of older persons in order to adopt targeted measures to reduce risks of poverty, social exclusion, health and digital marginalization, and institutional invisibility.
- 10.14. **Increase access to long-term care, reduce waiting lists, and ensure transparency of information**
 Increase access to long-term care through the development of community-based services, expansion of accommodation capacities, and reduction of waiting lists, with greater emphasis on home- and community-based services. Ensure transparent, easily accessible, and regularly updated information on waiting lists and accommodation capacities so that users and their families can make informed decisions.
- 10.15. **Establish a registry of licensed care providers and combat illegal providers**
 Establish a publicly accessible and regularly updated registry of licensed accommodation providers and strengthen oversight of illegal providers in order to protect the safety and dignity of older persons.
- 10.16. **Adopt a long-term workforce policy for long-term care**
 Adopt and implement a long-term policy for the employment, education, and retention of staff in the long-term care system, including improvements in working conditions and opportunities for professional development.
- 10.17. **Regulate the labor framework for family members caring for older persons**
 Amend the legislative framework to enable the use of sick leave, extended leave, or other forms of absence for caring for older family members, including the possibility of suspending employment tenure and ensuring appropriate compensation, as well as introducing flexible working arrangements adapted to caregiving responsibilities.
- 10.18. **Regulate the status of family caregivers for older and dependent persons**
 Clearly regulate the status of family caregivers providing care for older and dependent persons in order to ensure legal certainty, access to rights, and adequate support.

10.19. **Expand access to respite care services for all informal caregivers**

Expand access to respite care services for all informal caregivers, regardless of whether they have formally recognized caregiver status. This would reduce the burden on family members and prevent their health and social exhaustion.

10.20. **Prevent digitalization from excluding older persons**

Ensure that the digitalization of public and private services does not exclude older persons by maintaining access to services in non-digital formats, developing support for the use of digital services, and adapting systems to persons with lower levels of digital literacy.

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