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Public Services for Vulnerable Groups of Citizens With and Without Disabilities

Executive Summary

This policy brief proposes concrete measures to enhance access to public services for citizens with and without disabilities in the Republic of North Macedonia (NM). It has been prepared within the Western Balkans Enablers for Reforming Public Administrations—Monitoring of Public Administration Reform project (WeBER 3.0). The methodological framework combines normative analysis of domestic legislation and institutional mechanisms with comparative alignment with United Nations (UN) conventions and jurisprudence relevant to this field. It employs a mixed-methods approach grounded in normative-legal analysis, quantitative benchmarking, and qualitative stakeholder insights. It draws on the analytical findings from the focus group held on 12 May 2025. This brief highlights systemic gaps in the provision of public services for vulnerable groups of citizens with and without disabilities. The framework adheres to the Principles of Public Administration (also known as the SIGMA Principles) to evaluate the coherence between legal frameworks, institutional practices, and inclusive equality.

Strategic Framework
for Public Administration Reform (PAR)

North Macedonia's public administration framework, based on the Law on Organisation and Work of State Administration outlines structures, functions, and principles for transparent, efficient, and citizen-focused governance. The Public Administration Reform (PAR) Strategy 2023–2030 (PAR) identifies four key segments for intervention in the forthcoming period. Although the strategic framework sets out a comprehensive structure for reform, its implementation remains slow and fragmented.

Across all SIGMA dimensions, North Macedonia demonstrates only moderate preparedness that was confirmed and by the European Commission (EC) Report for North Macedonia in 2024. At the regional level, the OECD/SIGMA, Western Balkans 2024 indicates an average range of 50–52%, positioning R.N. Macedonia slightly below the Western Balkans regional average, identifying a similar pattern of "moderate preparedness and uneven implementation across all functional dimensions." This observation is reaffirmed in the country-specific report, *OECD/SIGMA R.N. Macedonia 2024*, which states that "implementation of public administration reforms in North Macedonia has been limited since 2021".

From the perspective of the Convention on the Rights of Persons with Disabilities (CRPD), there are no existing studies on the normative framework and its alignment with the CRPD; The existing legislation indicates insufficient incorporation of CRPD principles into the overall public administration framework.

Policy Development and Coordination (PDC)

Across the Western Balkans, progress in the area of PDC has remained largely stagnant, According the report *OECD/SIGMA, Western Balkans 2024*, despite gradual improvements in the formal legal and institutional framework. In the PDC area, the region's performance remains stagnant despite improvements in legal frameworks. The regional average is 46/100, while North Macedonia is among the weakest, with approximately 38/100 in this area.

National strategic documents, PAR Strategy 2023-2030 and the National Development Strategy 2024-2044, provide a stable normative framework, but do not have measurable inclusivity, accessibility, or equality indicators, leaving CRPD principles insufficiently operationalized. The *ReSPA Analytical Paper* reinforces these findings. It indicates that the prevailing system is marked by limited inter-ministerial cooperation and weak monitoring mandates. According to the paper (p. 51), weak mandates for coordination, insufficient monitoring, and limited cross-ministerial cooperation result in fragmented and inconsistent policymaking processes. Regional research further emphasizes that transparency in administrative reforms across the Western Balkans remains low. The "Transparency of public administration reform in the Western Balkans study", reports limited transparency and sporadic open-government practices.

At the local and regional levels, studies highlight the systemic obstacles. The Study "Policy and Strategy Development & Coordination and Human Resources Management in Local Self-Governments, 2018" shows that while standards and procedural guidance formally exist, actual coordination and strategic management remain weak.

Municipalities frequently view strategy development as a compliance task, rather than a coordinated, evidence-driven process linking policy objectives to budgets.

Despite being recognised as "positive transparency instrument", the Electronic National Register of Regulations (ENER) which serves as the central platform for public consultations, is often used in a procedural rather than a substantive manner. (OECD/SIGMA R.N. Macedonia, 2024). The report "Mirror of the Government", illustrate persistent institutional shortcomings in participatory governance indicating that the public participation remains moderate. In 2024, citizens and organisations has submitted 143 comments across 20 out of 40 ENER-posted draft laws, yet ministries issued only 50 feedback responses (35%), most of which provided generic acknowledgements without substantive justification.

The ENER portal remains inaccessible to persons with disabilities, lacking compliance with accessibility standards as required under the CRPD. The report *Digital Transformation of Public Administration* reports that services are not accessible and are often not fully available, frequently redirecting users to external websites. Similarly, *UNPRPD Situation Analysis* notes that "persons with disabilities have limited access to information and communication due to lack of accessible formats and technologies." The EC Report for North Macedonia in 2024 additionally outlines the need to ensure inclusive and accessible e-government services.

The *Digital Gap Assessment* report further reveals significant barriers: only 16% of citizens have used the platform, while 55% have never used it, and 29% are unaware of its existence. Key obstacles include a lack of devices or internet access (53%), limited digital skills (33%), and language barriers (21%). Only 22% of respondents believe the platform is accessible to persons with disabilities. As a result, citizens still rely on in-person procedures, particularly in rural areas, which highlights gaps in interoperability, user experience, and digital literacy.

Public Service and Human Resource Management (PSHRM)

In the area of PSHRM, *the* OECD/SIGMA report for R.N. Macedonia assigns North Macedonia a score of 2.5 out of 5 for PSHRM, positioning it below the Western Balkans regional average of 2.8.

Although the Law on Administrative Servants and secondary legislation provide the basis for merit-based employment, implementation remains inconsistent, fragmented, and politically influenced. The OECD/SIGMA report for R.N. Macedonia notes that "the professionalisation of the public service in North Macedonia is hindered by political influence, inadequate strategic HRM, and the absence of a depoliticised senior management structure."

Empirical findings in *PAR Monitor,* reinforce these conclusions, observing that "appointment procedures continue to depend on political loyalty rather than professional capacity" Similarly, the EC Report for North Macedonia in 2024 detects "persistent challenges in ensuring merit-based recruitment, adequate training, and the professionalisation of the public administration." These assessments collectively demonstrate that while the normative framework is in place, its transformation into practice remains partial and uneven.

PSHRM practices shape both access to employment within the civil service and the quality of services they receive. Evidence shows that structural, cultural, and procedural barriers persist, limiting equal participation of vulnerable groups with and without disabilities, The *Situational Analysis of the Rights of Persons with Disabilities – 2021*, highlights the experiences of disrespect and aggressive behavior from civil servants. Regional studies on recruitment underline gaps in advertising, transparency, and accessibility for under-represented groups. The OECD/SIGMA report for R.N. Macedonia, stresses that the lack of intersectional data prevents effective monitoring of equal-opportunity and diversity measures.

Focus-group discussions conducted by EPI in the frames of WeBER 3.0 Project reveal that inclusion of persons with disabilities in public administration remains procedural rather than transformative. While the legal framework promotes equality and non-discrimination, civil servants reported uncertainty about how to recruit or support employees with disabilities.

Persons with disabilities pointed to structural barriers such as inaccessible workplaces, lack of reasonable accommodation, and absence of mentoring or support systems. The focus group participants articulated a strong consensus that inclusion must transition from isolated training sessions to an institutionalised training framework, embedding disability inclusion in the learning management system (LMS) and establishing annual mandatory modules. Also, Persons with disabilities emphasised that institutions need to be more open to cooperation with organisations of persons with disabilities (OPDs) and other civil society experts.

Civil servants confirmed that institutional human resource units "don't know what to do and how to employ/engage people with disabilities", illustrating limited procedural clarity and the absence of training on inclusive recruitment. Integrating disability-related questions into the civil service entrance exam, as recommended by participants, would concretely operationalise Principle 3 - PSHRM. These observations confirm that inclusive practices remain project-based and donor-dependent rather than institutionally owned consistent with As the OECD/SIGMA for R.N. Macedonia (2024) report observed, implementation of merit-based and inclusive practices "remains weak, and training and professional development are largely dependent on donor projects" assessment that implementation of HRM principles remains weak and training largely externally funded.

The Balancer tool obliges institutions to plan employment based on ethnic representation. While it enhances fairness in ethnic distribution, it entirely excludes gender, disability, and age dimensions. Despite legal commitments under the CRPD, the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) and Sustainable Development Goal (SDG), gender, disability, and youth parity in public administration remain limited due to weak data systems and fragmented inclusion mechanisms.

Organisation, Accountability, and Oversight

The legal framework on accountability, transparency, and accessibility remains fragmented across sectoral laws, lacking a unified, rights-based architecture. As a result, the country does not have an integrated system ensuring vertical, horizontal, and participatory accountability.

Participants from the focus group underlined that accountability cannot be limited to legal texts, as one participant stated: "It's the best approach to involve us from the very beginning in the initial phase of service design." This testimony highlights a significant deficit: persons with disabilities are often consulted too late or only symbolically, which contradicts the obligations under CRPD. The failure to include end-users in the design of digital and administrative services undermines both the merit-based, participatory ethos of the SIGMA Principle 4, which expects public organisations to be accountable to citizens for service outcomes and inclusivity.

Regarding the vertical chain of responsibility, there is no effective line of accountability, resulting in adverse effects on performance outcomes. The conclusion from the report OECD/SIGMA for R.N. Macedonia (2024) is that the oversight architecture remains fragmented. The State Commission for the Prevention of Corruption (SCPC), the State Audit Office (SAO), and the Ombudsman operate with overlapping mandates, with limited data exchange, and no unified indicators. Transparency International Corruption perception index 2024 scores the country at 40/100, reflecting a decline of two points compared to the previous year and ranking the country 88th out of 180 40 for 2024. This downward trend underscores ongoing challenges with enforcement, institutional integrity, and systemic accountability."

Digital accountability also remains partial. Although information and digital accountability are legally regulated, their implementation remains only partly aligned with the CRPD. According the PAR Monitor, 2024/2025, the institutional websites and e-services (uslugi.gov.mk) are largely inaccessible; *40% of users report difficulties due to low accessibility and complex authentication.*

Feedback mechanisms exist only formally. Institutional feedback systems were described by participants from the focus group as non-functional or performative: "Do you have a complaint box?" "Yes, but it doesn't matter because it's not being used."

Participants and officials acknowledged that while mechanisms exist, there is no follow-up or monitoring in place. One of the civil servants stated: "When we receive such queries, we forward them, but we don't know what happens next". Civil servants from the focus group stated that the problem is broader and "raising public awareness is also needed."

Such testimonials highlight that institutional structures fail not just in digital accessibility but in broader participation and complain mechanisms. Under the CRPD institutions must ensure accessibility of services and access to justice for persons with disabilities.

Access to public information is a core element of democratic participation and anti-corruption oversight. Free access to public information is a cornerstone of transparency, democratic participation, and anti-corruption oversight. The European Court of Human Rights (ECtHR) has confirmed that this right is a substantive component of public accountability and institutional trust. In Magyar Helsinki Bizottság v. Hungary

(2016), the Court held that effective access to public data is a prerequisite for accountability and public debate, particularly in matters of public interest, budgetary spending, or decisions that affect the wider community. Similarly, in Youth Initiative for Human Rights v. Serbia (2013), the Court found that state authorities must not disregard their obligations of transparency and accountability, as this directly undermines public trust and restricts parliamentary and civic oversight. These judgments underscore that access to information is not merely an administrative procedure, but a fundamental element of the rule of law and public accountability

Under the Copenhagen criteria and EU Chapters 23 and 24, accountability is a fundamental dimension of democratic governance and the rule of law. EC Report for North Macedonia in 2024 notes that despite legislative progress, enforcement remains weak with limited institutional follow-up. Operationalising SIGMA Principle 4 through stronger oversight bodies, functional information systems, user-centred and accessible digital services, and participatory consultation practices is essential for aligning with EU standards, CRPD obligations, and SDG commitments.

Principle 5: Service Delivery and Digitalisation

A full understanding of service delivery is crucial for policy-making, yet policy makers in North Macedonia lack comprehensive data on service efficiency and user outcomes. The absence of inclusive policies often leads to inadequate service provision. Research highlights the importance of co-production of public services (International Journal of Public Administration, 2021), where vulnerable groups with and without disabilities actively participate in the design and implementation of services (Mulvale, 2019). This approach ensures that services are more responsive to their needs, enhancing both accessibility and user satisfaction.

Although the national legal framework (Law on General Administrative Procedure, Law on Public Services, Law on Electronic Governance, etc.) sets foundational rules at the national level, the delivery of services is further regulated through sectoral laws that define specific standards and mechanisms for individual areas. These specific laws operationalise the principle of public service delivery within sectors, each with its own standards, indicators, and institutional mechanisms for monitoring service quality and user satisfaction. EC Report for North Macedonia in 2024 notes that, despite this framework, institutions still do not provide user-oriented services, particularly for vulnerable groups including persons with disabilities.

The report OECD/SIGMA, 2024, Public Administration in the Western Balkans acknowledges institutional progress in digitalization, driven by the PAR Strategy -30, but emphasizes persistent fragmentation of responsibilities between institutions, hindering the implementation of the user-centric service principle. As it noted in the report the ". mechanism to centrally monitor service accessibility for disadvantaged groups has not been established, and relevant data are scarce".

The OECD/SIGMA Paper No. 74 (2024) finds that national e-service systems across the region, including those of North Macedonia, remain fragmented and fail to fully comply with accessibility and interoperability standards. It also notes that "special attention should be given to preparedness for the user-centricity requirements—user interface standards, user statistics and user feedback on services."

Focus-group participants confirmed that services are developed without user testing and that persons with disabilities are excluded from design and evaluation processes. Both citizens and officials emphasized that service information and physical infrastructure remain largely inaccessible ("70% of polling stations are inaccessible," according to direct participant statements) and the awareness of available e-services is low.

The PAR Monitor, 2024/2025, shows that although North Macedonia has strategic frameworks for transparency and accessibility, practical implementation is limited. The national e-services portal (uslugi.gov.mk) functions technically, yet vulnerable groups with and without disabilities remain excluded due to low digital literacy and inconsistent accessible design. Municipal capacities are weak: only 25% of municipalities offer functional e-services, most rely on paper processes, and many buildings remain physically inaccessible.

Additionally, research Western Balkan Regional Study on Digitalisation in Government (2023) highlights that public services in the region remain institution-centric rather than citizen-centric and recommends introducing a "service-by-design" approach that includes testing with end-users. Collectively, these studies demonstrate that technical digitalisation without accessibility, universal design, and user consultation fails to realise the essence of the public service delivery principle.

Overall, these studies demonstrate that technical digitalisation without accessibility, universal design, and user consultation fails to realise the essence of the public service delivery principle. Sustainable reforms require user-centric design, inclusive co-production, interoperable systems, and meaningful involvement of persons with disabilities at every stage of service development.

Public Financial Management

According to the report OECD/SIGMA for R.N. Macedonia (2024), "public services shall be citizen-oriented, equal, accessible, and continuously improved.". This principle establishes a direct connection between budget execution and equity in service delivery, requiring transparent and results-based budgeting. The CRPD Committee, in its Concluding Observations on North Macedonia (2023), identified persistent gaps in budgetary and institutional measures aimed at ensuring equality and accessibility within the judiciary and public administration. The Situational Analysis of the Rights of Persons with Disabilities – 2021 further highlights the absence of dedicated budget lines, monitoring mechanisms, and cross-ministerial systems for tracking inclusion, reasonable accommodation, and accessibility creating non-compliance with CRPD obligations.

In North Macedonia, there is a legal obligation for gender-responsive budgeting at both the national and local levels according the Budget Law. This obligation is applied in a one-dimensional manner, as it does not incorporate an intersectional approach. Therefore, it is necessary to revise the legal framework and introduce an obligation for "inclusive equality budgeting," which will ensure the systematic integration of intersectional principles and guarantee that budget processes reflect the diverse needs of all communities. This model would enable a fair allocation of public resources and strengthen equality in line with CRPD.

Budget transparency, accessibility and comprehensibility of budgetary information for citizens remain limited. The Citizens' Budget, is remain difficult for the general public to understand and does not meet accessibility standards. Similar shortcomings affect financial and budget documents, which are frequently published in non-accessible formats. The Open Budget Survey, 2023 scores North Macedonia 35/100 for transparency and only 7/100 for public participation, indicating weak or symbolic opportunities for citizen involvement in the budget process.

At the municipal level, transparency and public engagement are inconsistent. The UNDP (Citizen-Centered Financial Management at the Local Level and Finance Think reports (Financial Transparency and Reporting at the Local Level (2022)) show that many municipalities and public enterprises lack accessible websites, fail to publish machine-readable budget data, and provide limited participatory budgeting opportunities—leaving vulnerable groups with and without disabilities excluded from fiscal decision-making.

The Public Procurement Law formally transposes parts of Directive 2014/24/EU, including Article 42, which governs technical specifications. However, the core requirements from Article 42(1) of the Directive has not yet been incorporated. This omission is not merely a technical issue but a governance failure, as accessibility constitutes both an accountability and equality dimension of procurement integrity. The report OECD, 2024, Public Administration in North Macedonia finds that although institutional foundations are solid, practical implementation remains weak and has not improved efficiency or integrity in procurement. The establishment of the Electronic System for Public Procurement (ESPP) (www.e-nabavki.gov.mk) has improved transparency and traceability of procurement procedures. Nevertheless, practical implementation remains limited. Although electronic systems exist, genuine accessibility and inclusiveness are still lacking. Also considering this issue, the EC Report for North Macedonia in 2024 presents that the remedies system remains slow, under-resourced, and inefficient, particularly in tracking and classifying types of violations.

The management of public funds must ensure *integrity, transparency, accountability,* and *equal treatment* of all market participants. Procurement is therefore not merely a technical function but a mechanism of rule of law and public trust. A cornerstone of EU jurisprudence on transparency in procurement is the Court of Justice of the European Union (CJEU) judgment in the case Telaustria Verlags GmbH and Telefonadress GmbH v. Telekom Austria AG In paragraph 62, the Court is states: "The principle of transparency implies a degree of advertising sufficient to enable the services market to be opened up to competition and the impartiality of procurement procedures to be reviewed."

This ruling establishes that transparency is not optional, but it is a fundamental requirement that ensures competitive, fair, and reviewable procurement processes across EU Member States and candidate countries alike.

Horizontal Principles (Data, Accessibility, and Equality)

The integration of horizontal principles, including data collection, accessibility, and equality remains weak. Disaggregated data on disability, gender, and ethnicity, as required under CRPD and SIGMA Principles 3 and 6, are largely absent, which limits the monitoring of inclusivity in policies, services, and human resources.

The Personal Data Protection Law (2020) and national surveys, including the 2021 Census, do not adequately capture disability and intersectional factors, thereby undermining transparency and accountability in line with Council of Europe and EU standards.

Accessibility is a hybrid right and is applied inconsistently. Beyond physical infrastructure, violating the Anti-Discrimination Law and the CRPD call for unified standards and oversight. Regulatory bodies also lack sufficient capacity as well as representation of people with disabilities.

Accessibility is still interpreted narrowly, confined to physical adjustments rather than systemic change in digital, procedural, and communicational domains.

Equality and non-discrimination norms under CRPD and SIGMA principles remain largely formalistic, with weak complaint-handling, monitoring, and training systems, reflecting a structural gap in the operationalisation of these principles across public administration.

Conclusion

North Macedonia's public administration demonstrates a strong formal commitment to reform, but its implementation remains weak. Human rights commitments, including the ratification of the CRPD and CEDAW, are undermined by the lack of measurable indicators, disaggregated data on disability, gender, and ethnicity, as well as accessible budgeting. Legal and administrative systems remain formalistic, resulting in policies that are "inclusive on paper" but inaccessible in practice—as seen in limited consultation with OPDs and poorly accessible digital platforms.

Public servants often lack training and confidence in applying inclusive principles, while vulnerable citizens including and citizens with disabilities face systemic exclusion. Accountability mechanisms and citizen feedback systems exist, but they operate in silos and are largely symbolic, thereby limiting transparency and civic oversight. Service delivery and digitalisation remain fragmented. Most municipalities rely on in-person, paper-based procedures, with limited access to e-services, excluding vulnerable citizens with and without disabilities. Public financial management treats accessibility and inclusion as optional, without limited disability responsive budgeting and enforceable procurement standards.

Horizontal principles remain the weakest link. Disaggregated data is largely absent, accessibility is narrowly interpreted, and equality provisions are applied reactively rather than proactively.

Policy Recommendations

The following recommendations target systemic gaps identified in this policy brief. They aim to enhance institutional accountability, accessibility, and inclusivity in North Macedonia's public administration.

1. Strategic Framework for PAR

The strategic direction of PAR must evolve into a genuinely inclusive, measurable, and human-rights-aligned framework. The PAR Strategy should explicitly integrate CRPD principles, clearly defined equality indicators, and mechanisms that monitor how reforms affect vulnerable groups with and without disabilities. A systematic approach to inclusivity must be institutionalised through a dedicated assessment tool and annual reporting, ensuring the PAR Strategy remains a living, accountable instrument rather than a static policy document.

Key Actions:

1.1 Amend the PAR Strategy 2023–2030 to embed CRPD-based objectives and measurable inclusion indicators across all reform pillars.

1.2 Introduce a mandatory Inclusivity Impact Assessment (IIA), complementing the RIA, to evaluate every legislative or policy proposal's implications for accessibility, reasonable accommodation, and equality.

1.3 Publish an Annual Inclusive Governance Report tracking progress on accessibility, equality, and SDG 16.6 benchmarks.

2. Policy Development and Coordination

PDC must be grounded in structured, evidence-based, and participatory approaches. This requires systematic consultation with organisations of persons with disabilities, updated methodologies that capture equality impacts, and accessible civic participation tools. Digital platforms must be redesigned to enable meaningful, traceable participation, while policymakers must be trained to apply inclusive governance standards and international jurisprudence on transparency and public participation.

Key Actions:

2.1 Amend the core governance laws to mandate OPD and equality-body participation in all regulatory processes.

2.2 Update the Regulatory Impact Assessment (RIA) Methodology to include mandatory equality impact analyses.

2.3 Ensure full accessibility and usability of the ENER and uslugi.gov.mk, integrating traceable e-consultation functions.

2.4 Align the National Development Strategy 2024–2044 with inclusivity indicators.

3. Public Service and Human Resource Management

A modern civil service must be diverse, merit-based, and reflective of society's full composition. To achieve this, recruitment, onboarding, professional development, and promotion must be grounded in inclusive equality. Training institutions should embed CRPD principles into mandatory curricula, while ministries and municipalities must develop systems for systematic reporting, reasonable accommodation, mentoring, and retention of employees from vulnerable groups. A coherent HRM data architecture is essential for monitoring fairness and parity.

Key Actions:

3.1 Enact the Law on Senior Civil Service with binding provisions for diversity, provision for reasonable accommodation, and transparent accessible recruitment.

3.2 Integrate CRPD-based modules (inclusive equality, accessibility, intersectionality, anti-discrimination) into the Public Administration Training Academy's curriculum, mandatory for certification and advancement.

3.3 Require annual HR diversity reporting, disaggregated by disability, gender, age, and ethnicity.

3.4 Establish a National Mentoring Programme for public servants with disabilities to promote advancement and retention.

3.5 Mandate inclusive recruitment and retention policies in municipalities, with reasonable accommodation measures.

3.6 Implement local capacity-building programmes (in partnership with the Academy and OPDs) on inclusive equality, CRPD rights, and anti-discrimination duties.

3.7 Expand the Balancer web tool to include gender, disability, and youth indicators for comprehensive parity management.

4. Organisation, Accountability and Oversight

Accountability mechanisms must ensure transparency, oversight, and citizen engagement across public institutions. This requires accessible information, inclusive inspection systems, and interoperable data platforms linking oversight bodies. Parliamentary oversight should be regular and anchored in CRPD guidance, while citizens must have access to clear, public dashboards tracking institutional performance. International and national reports must be in accessible formats, ensuring that transparency obligations apply equally to all groups.

Key Actions:

4.1 Amend the Law on Free Access to Public Information to mandate accessible formats (Easy Read, audio, sign language, and HTML) as an obligation to all public and private entities that are providing public services.

4.2 Amend the Law on Inspection Supervision to include inclusive inspection teams with OPD and individual with disabilities participation.

4.3 Create an Open Data Transparency Platform interlinking the SAO, the SCPC, and the Ombudsman for data sharing and monitoring under the OGP Action Plan (2024–2026).

4.4 Develop citizen-monitoring dashboards tracking audit recommendations, complaint follow-up, and service quality outcomes.

4.5 Ensure that all reports, assessments, and publications produced by public officials OECD/SIGMA, the EC, and national monitoring institutions are available in accessible formats.

5. Service Delivery

Public services must be designed and delivered in ways that are accessible, understandable, and responsive. Co-design with OPDs and vulnerable groups with and without disabilities is essential to ensure usability and system trust. Accessibility standards must be unified and enforced across all levels of government, while municipalities should be empowered to implement local inclusion plans. Consistent communication and awareness-raising are critical for ensuring that citizens understand their rights and available services.

Key Actions:

5.1 Adopt a National Accessibility Standard harmonised with Directive (EU) 2019/882 and CRPD.

5.2 Establish a Co-Design Framework mandating the involvement of OPDs and vulnerable citizens in e-service testing and evaluation.

5.3 Create a Service Quality and Accessibility Index (SQAI) within uslugi.gov.mk to monitor inclusion and satisfaction, disaggregated by intersectional data.

5.4 Amend the Law on Electronic Management and Electronic Services to mandate full accessibility compliance and independent audits.

5.7 Introduce a legal obligation for all public institutions to publish accessible information and conduct regular public-awareness campaigns on accessibility rights.

6. Public Financial Management

Fiscal processes must embed inclusive equality as a core value, ensuring that public resources reflect the needs and rights of all citizens. Transitioning from a one-dimensional gender-budgeting model to inclusive budgeting will ensure that budgets promote equal participation and access. Procurement must incorporate accessibility and equality criteria, and financial transparency tools must be accessible in all formats. Human rights assessments must guide resource allocation decisions across all budget cycles.

6.1 Amend the Budget Law to institutionalise Disability and Gender-Responsive Budgeting (Inclusive budgeting) *and* require additional budget lines for accessibility and reasonable accommodation.

Key Actions:

6.2 Integrate accessibility compliance clauses in all procurement procedures

6.3 Develop accessible procurement guidelines with model clauses rewarding inclusive suppliers.

6.4 Ensure the Citizen Budget Portal and all financial reports are published in accessible formats.

6.5 Conduct Human Rights Impact Assessments across all funding cycles to ensure compliance with the CRPD, ECHR, ICCPR, and ICESCR standards.

7. Horizontal Principles: Data, Accessibility, and Equality

A robust system for inclusivity requires reliable, disaggregated data, coherent accessibility obligations, and harmonised equality standards. Disability must be recognised as a standalone category within personal-data frameworks, distinct from medical approach. Sectoral guidance on reasonable accommodation must be mandatory, and an intersectional national data system should enable monitoring across disability, gender, age, and ethnicity. Regular reporting and a dedicated authority for accessibility and equality compliance will strengthen institutional accountability.

Key Actions:

7.1 Amend the Law on Personal Data Protection to explicitly recognise disability as a separate personal data category for equality monitoring

7.2 Define data-separation protocols to prevent mixing disability data with medical or impairment categories, and conduct training explaining that disability data is required to be collected.

7.3 Mandate every ministry to prepare sector-specific guidelines on reasonable accommodation for all ministries, municipalities, and public enterprises.

7.4 Establish a National Intersectional Data System (NIDS) under the State Statistical Office for cross-sector, disaggregated data (disability, gender, age, ethnicity).

7.5 Require annual inclusivity reports in an accessible format from all ministries and municipalities, aligned with the Law on Personal Data Protection.

7.6 Introduce mandatory training programmes for public officials, academia, and the private sector on inclusive equality, accessibility, and CRPD compliance.