



EU TECHNICAL ASSISTANCE
TO CIVIL SOCIETY ORGANISATIONS
IN THE WESTERN BALKANS AND TÜRKIYE

**DG ENEST Guidelines for
EU Support to Civil Society
in the Enlargement Region
2021–2027**

2024 Assessment

**Report for
SERBIA**



Funded by
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Abbreviations and Acronyms

BIA	Security and Intelligence Agency of Serbia
CASE	Coalition Against SLAPPs in Europe
CSO	Civil Society Organisation
DG ENEST	Directorate-General for Enlargement and the Eastern Neighbourhood
EU TACSO₃	European Union Technical Assistance for Civil Society Organisations (Phase 3)
KOMS	National Youth Council of Serbia
KRIK	Network of Investigative Journalists in Serbia
LGBTIQ	Lesbian, Gay, Bisexual, Transgender, Intersex, and Queer
NUNS	Independent Journalists' Association of Serbia
OECD	Organisation for Economic Co-operation and Development
RCC	Regional Cooperation Council
RSF	Reporters Without Borders
SNS	Serbian Progressive Party
UNS	Journalists' Association of Serbia
SLAPP	Strategic Lawsuit Against Public

Introduction to Annex

This country analysis is an Annex to the DG ENEST Guidelines for EU Support to Civil Society 2021–2027: Assessment Report 2024.

This assessment provides evidence for the situation against the Guidelines' indicators for 2024.

This annex provides a summary of the evidence for assessment of the situation in Serbia against each of the 59 indicators in the Guidelines. This annex should be read in conjunction with the main report, which is available on the tacso.eu website.

Methodology

The analysis presented in this report is based on data collected from primary and secondary sources. Primary research included a survey of civil society organisations (CSOs) and public officials, as well as a legal analysis of relevant laws. Secondary sources such as reports produced by CSOs, national human rights institutions, government, and others were reviewed to provide relevant information and data. The data collection and analysis primarily refer to 2024. The survey of public officials was run between 10 February to 3 March 2025. The aim of the survey was to collect the perspectives on specific relevant indicators of selected public officials who, in their work, engage most closely with CSOs. Thirty valid responses were received from Serbian public institutions, which represents an improvement when compared with the 17 responses for the 2023 Assessment and the 13 responses collected for the 2021 baseline assessment. The survey was anonymous.

The CSO survey was run between 19 January and 10 February 2025. It was disseminated through various channels with the support of CSOs, CSO networks, and the EU National Resource Centre, to make sure that the outreach covered a broad variety of CSOs. The survey elicited a total of 147 valid responses from CSOs in Serbia, compared with the 175 in 2023 and the 95 valid responses in the 2021 survey. The relevance of responses was ensured at the data-cleaning stage, when respondents who indicated that they did not belong to the target group were filtered out. While it was not possible to ensure geographical representation within Serbia or determine the size of the CSO population, given the lack of reliable data on the number of active CSOs within the definition relied upon in this exercise, based on the number of valid responses received, the margin of error has been 8%. This margin of error has been statistically calculated using the number of CSOs listed in the official CSO register hosted by the Serbian Business Registers Agency to determine the size of the population.

The CSO survey consisted of mostly closed questions and was anonymous. A majority of the respondents were senior officers within their organisations: executive directors (39%), senior managers (7%) and board members (25%). More than half of the respondents, 63%, identified as women. Most of the respondents, 45%, were aged 51 or older, while 24% belong to age group from 41 to 50. Nineteen percent of respondents identified as belonging to a community, minority or marginalised group. Of those who identified as belonging to such a group, most identified as belonging to the ethnic Roma, Ashkali or Egyptian communities, persons with disability and LGBTIQ. Most of the participating CSOs were established over the past two decades: 11% after 2021, 33% between 2011–2021, and 35 % between

2001–2011. Sixteen percent were established between 1991 and 2000, and 5% prior to 1990. Ninety seven percent of respondents came from officially registered organisations. Most of the participating officially registered CSOs, which is to say, 88%, are registered as citizen’s associations; 8% are foundations, 2% from non-profit companies and social enterprises. When it comes to the regions where their organisations are based, most respondents are from CSOs based in Belgrade (42%), followed by those in Šumadija and Western Serbia (23%), Southern and Eastern Serbia (18%), and Vojvodina (16%). Fifty-four percent of CSOs work at the national level, the same percentage work at the local level, 37% work on the regional level within the country, and the same percentage work internationally. Twenty percent of participating CSOs work exclusively at the local level, close to the 18% that work exclusively at the national level. Thirteen percent of respondents work exclusively internationally.

The highest proportion of CSOs participating in the survey, 29%, work in the sector of youth and youth rights, 26% work on social inclusion, followed by 22% working in the human rights sector, 17% in environment and climate action, 15% in arts in culture, 14% in education, research and innovation, 14% on rights of persons with disabilities, 12% on socio-economic development, 11% on gender equality and LGBTIQ rights, and 11% on public participation in policy and decision-making, followed by other areas. A significant majority of participating CSOs, 62%, were small organisations with 1–10 permanent, full or part-time staff and volunteers working at the time of the survey. Twenty percent of participating CSOs engaged between 10 and 20 staff and volunteers, while 15% engaged more than 21 staff and volunteers. Two percent of CSOs did not have any permanent, full or part-time staff and volunteers. Whilst 5% of CSOs did not have any annual turnover, 37% had an annual turnover of up to EUR 25,000. Twenty two percent of respondents stated that the annual turnover of their CSO was between EUR 25,000 and EUR 100,000, 19% had an annual turnover of between EUR 100,001 and EUR 500,000, and 15% stated that the annual turnover of their organisation exceeded EUR 500,000.

The sample of the CSO survey in 2024 shows a slight decrease in the number of respondents compared to the previous year — 147 valid responses in 2024, versus 175 in 2023. Despite the lower number of participants, the overall structure of the sample remained relatively stable across key demographic and organisational characteristics. The 2024 sample included fewer CSOs without staff or turnover, whilst having a higher proportion of organisations with larger turnovers, indicating the survey had reached more financially stable organisations. Sector-wise, youth-focused CSOs were more represented in 2024 (29%) than in 2023 (21%), while those working on environment and climate action were less represented (17% in 2024 vs. 23% in 2023).

Assessment against indicators

The data collected informed the analysis of the situation in 2024 against each indicator and the comparative values against the 2023 Assessment and 2021 baseline. The indicators were reviewed and assessed following the same method used in the baseline assessment¹. For indicators that have a normative assessment, such as compliance with legislation or standards, the following traffic-light system was used to provide a quick visual guide:

5 – fully meets standards
4 – meets most standards
3 – moderately meets standards
2 – minimally meets standards
1 – does not meet standards

The traffic light system was applied to those indicators where such an assessment was deemed meaningful. It was based either on the data collected through the CSO survey, or on the detailed analysis of applicable laws, policies and procedures against standards. The justification of the assessment is

¹ Values for Indicators 3.3.a, 3.7.a and 3.7.b for 2021 and 2023 were recalculated to rectify an error, the revised values are presented in the section related to each indicator.

available in the respective country reports and related analyses in Annexes 1–7.

The remaining indicators do not have a normative standard, but instead, provide an indication of year-on-year trends.

This Report assesses the state of civil society in Serbia throughout 2024, analysing key developments assessments and the levels of implementation of individual indicators under each of the three specific objectives.

The findings and indicator ratings are based on data collected and developments observed during the 2024 calendar year.

However, it is important to acknowledge that several significant events unfolded in the early months of 2025 that could substantially impact the assessment of specific indicators. These include a sharp escalation of threats to freedom of peaceful assembly amid ongoing mass protests following the collapse of a canopy at the Nevi Sad Railway Station.²

In addition, in January 2025, civil society representatives froze their participation in the Council for Creating an Enabling Environment for Civil Society. This decision was prompted by a series of alarming developments: the continuation of state-sponsored smear campaigns against CSOs, the lack of institutional response to reported threats and pressure on activists, and the arbitrary detention and expulsion of foreign participants involved in an Erste Foundation NGO training programme.³

Also in early 2025, the Directorate for the Prevention of Money Laundering requested that banks in Serbia provide account information for five individual activists⁴. This action mirrors a similar episode from 2019, widely known as the ‘List Affair’, when the Directorate requested financial data on 20 journalists, activists, and politicians, as well as 37 organisations, including investigative media outlets. That data was subsequently misused in smear campaigns aired by pro-government media. The 2019 incident was strongly condemned by international organisations⁵, and the recurrence of such practices in 2025 raises serious concerns about the continued misuse of state mechanisms to intimidate and discredit civil society actors.

These developments, though outside the scope of the 2024 reporting period, are noted here as they provide important context for understanding the deteriorating environment for civil society in Serbia and will be closely considered in future assessments.

² Civic Initiatives 2025

³ Radio Free Europe 2025

⁴ Maja Stojanović (Civic Initiatives), Katarina Đukić (ProGlas), Sofija Todorović (Youth Initiative for Human Rights), Predrag Voštinić (Local Front) and Nebojša Petković (Ne damo Jadar).

⁵ Radar 2025.



Specific Objective 1

A conducive environment for civil society to carry out its activities is in place.

SO 1.1. All individuals and legal entities in the Enlargement Region can establish, join and participate in non-formal and/or registered organisations, can assemble peacefully and can express themselves freely

Indicator 1.1.a: Extent to which relevant domestic legislation provides that:

- Associations can be established or registered without discrimination on any grounds;
- No unlawful restrictions are placed on the scope of their activities or pursuit of their objectives;
- Their termination may only occur following a decision by an independent and impartial court;
- No unlawful restrictions are placed on freedom of peaceful assembly;
- Freedom of expression is exercised by all, and no unlawful restrictions are imposed.

2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	3 – moderately meets standards

Freedom of association

There were no new laws or provisions introduced in 2024 that directly prevented the establishment or registration of associations/organisations.

The most important laws that regulate restrictions on the scope of activities or pursuit of objectives of associations/organisations are the Law on Associations and the Law on the Prohibition of Manifestations of Neo-Nazi or Fascist Organisations and Associations, and the Prohibition of the use of Neo-Nazi or Fascist Symbols and Marks.

There were no new laws or provisions introduced in 2024 that directly placed restrictions on the scope of activities or pursuit of objectives of associations/organisations. While the laws aim to protect legitimate state interests, the broad and sometimes vague wording of the restrictions on the scope of activities and objectives of associations creates an opportunity for arbitrary application of these laws, potentially hindering the freedom of association.

Both the Constitution and the Law on Associations explicitly forbid “secret and paramilitary associations”.

In late December 2024, Serbian President Aleksandar Vučić disclosed the existence of a faction within the ruling Serbian Progressive Party (SNS) referred to as «loyalists», describing them as ideologically extreme, organised, prepared to defend their regime and sworn by blood oath in a church—raising serious questions about the State’s impartiality in applying this legal standard.⁶ If any other political or civil society actor, particularly those critical of the government, were to engage in similarly clandestine or militaristic activities, they would almost certainly face swift investigation and legal sanctions. This incident illustrates the potential arbitrary application and selective enforcement of the law on Associations and Constitution. In response to these concerns, a segment of Serbian citizens initiated a petition demanding the disarmament of the so-called «loyalists». It called upon the relevant authorities to investigate, identify, and disarm the group, and to inform the public about

6 Novosti, 2024a

its membership and intentions.⁷ No official reaction from relevant state bodies has been recorded since.

According to publicly available data, in the reporting period there were no cases of termination of associations in a way not prescribed by law.

On 29 November 2024, the Socialist Movement Party, widely seen as pro-Russian, submitted a draft law to the Serbian Parliament proposing the creation of a registry for “agents of foreign influence,” raising serious concerns regarding freedom of association. The proposed law targets nonprofit organisations that receive over 50% of their funding from foreign sources or engage in broadly defined political activities, requiring them to register under this label. This designation could stigmatise civil society organisations (CSOs), deter foreign donors, and impose heavy administrative obligations, such as bi-annual financial disclosures. Additionally, the Ministry of Justice would be empowered to conduct extensive inspections and impose penalties, including fines, bans, and potential criminal charges against CSO leaders.⁸ The draft Law lacks current support from the ruling coalition to be adopted, but the president of the Socialist Movement Party (which is part of the ruling coalition) claims he will not give up on its intention to pass a law on foreign agents.

Freedom of assembly

Serbia’s legal framework for peaceful assembly in 2024 remains unchanged from previous years, and retains its existing weaknesses. Restrictions on assembly locations imposed by the Law on Protection from Noise Pollution in the Environment are defined too broadly, lacking specific risk assessments, allowing local governments to designate areas off-limits for gatherings, creating conflicts with the Law on Public Assembly and further restricting this fundamental freedom. The Law on Public Assembly grants the police broad discretionary powers to prohibit assemblies, without requiring a clear assessment of proportionality. The organisers of gatherings are obliged to notify the police, but the application process for notification is burdensome, often requiring extensive documentation, and even minor procedural errors can lead to bans on gatherings. As a result, assemblies that are not properly notified to the police may be penalised with fines, regardless of their peaceful nature or intent. The law provides no obligation for the police to notify organisers when an assembly is prohibited, whilst if the police do notify them, it leaves extremely short deadlines for appeals; and the absence of a mandatory time frame for court rulings against those decisions make legal remedies largely ineffective.

The latest annual report of the International CIVICUS Alliance continues to place Serbia where it was placed in 2019, in the category of «obstructed» countries when it comes to civic space, but due to a significant decline of civil liberties, Serbia has been added to the CIVICUS Monitor watchlist, which flags countries with rapidly declining civic space. In 2025’s first edition, Serbia joins four other nations with faltering civic space: the Democratic Republic of Congo, Italy, Pakistan and the United States of America.⁹ As CIVICUS reported in 2024, mass protests erupted in Serbia against a planned lithium mine. Dozens of activists were arrested in 17 cities in August 2024 for allegedly “calling for a violent overthrow of the constitutional order”, based on their social media posts or participation in protests. While most detentions were brief, civil society groups criticised the use of detention as an intimidation tactic. Activists and critics have also been confronted with anonymous threats, checks and prolonged detentions at border crossings. Of particular concern are the persistent narratives that portray resistance to the mining project as a foreign-backed plot to destabilise Serbia.¹⁰ On 1 November 2024, the collapse of a newly renovated railway station in Novi Sad, which killed 16 people (the figure known at the moment of preparing the Report), sparked fresh protests. Authorities responded with increased repression, including excessive force and arrests by plainclothes officers who refused to identify themselves, raising serious concerns about protesters’ rights and safety.¹¹

7 Vreme 2024

8 Slobodna Evropa 2024b

9 Civicus 2025

10 President Vucic accused the West of supporting the protests, adding that Russian security services had warned him that “mass riots aimed at a coup d’état” were being prepared. Slobodna Evropa 2024d

11 Civicus 2024 p65

The report from the National Youth Council of Serbia on Violations of Youth Rights and Threats to the Safety of Young Activists in Serbia highlight severe violations of the right to freedom of assembly in Serbia, particularly in response to the student-led protests and university blockades that started in November 2024. Peaceful demonstrations demanding government accountability were intensified after physical attacks on students during blockades occurred, and were met with repressive measures, including arbitrary arrests, intimidation, and physical violence. Protesters faced police brutality, as well as targeted attacks by individuals linked to the ruling party. Additionally, pro-government media campaigns sought to delegitimise the protests, portraying activists as foreign agents and fuelling an atmosphere of fear. Statements by high-ranking officials, including calls for deploying military police against protesters, further escalated tensions and reinforced the perception that the state views public gatherings as a threat rather than a democratic right.¹²

The systematic suppression of peaceful assembly, coupled with increasing violence and lack of institutional response, has significantly undermined civic engagement and democratic participation in Serbia.

In 2024, several instances illustrated a worsening situation in comparison to 2023, including excessive police force during environmental protests, arrests and detentions of activists¹³, and the use of 'informative interviews' and tax audits¹⁴ to intimidate those who participate in protests. Some of those interviews were conducted by the Serbian security and intelligence agency (BIA)¹⁵. Typically, interviews with citizens are functions more commonly assigned to other government entities, such as the Ministry of Internal Affairs, which handle communication with citizens. Intelligence services generally are not permitted to engage in informative or informal interviews without clear legal grounds. The BIA's engagement in such activities can be viewed as contrary to international human rights standards, particularly those designed to protect individuals from unwarranted government interference with their privacy and freedom.

In 2024, Serbia witnessed numerous spontaneous protests, particularly following the collapse of the canopy at the Nevi Sad Railway Station, which led to mass demonstrations. During these events, instances were recorded where the police response was delayed or inadequate, resulting in escalated violence and clashes between protesters and groups that were provoking and assaulting them.¹⁶

According to international standards, including decisions of the European Court of Human Rights,¹⁷ the police are obligated to ensure the right to peaceful assembly, regardless of whether protests are formally authorised or not. This entails a timely and proportionate response to ensure the safety of all participants and to prevent violence. Delayed or absent police response can lead to violations of these standards and endanger citizens' right to peaceful assembly.

In 2024 Serbian authorities, citing national security concerns, denied entry to various foreign nationals, including activists, artists, and journalists. Those include Bosnian activist Nedim Musić who had previously supported protests against lithium mining projects in Serbia as well as Bosnian actor and writer Feđa Štukan who was denied entry into Serbia at Belgrade's airport. Authorities labeled him a security risk. This was the second time Štukan faced such a ban; he was previously denied entry in mid-2023 after participating in mass civic protests in Belgrade. The specific reasons for these denials of entry were not publicly disclosed, leading to concerns about transparency and the potential suppression of dissenting voices.¹⁸

All these actions described above, along with targeted media campaigns against CSOs, highlight an increase in pressures and restrictions on assembly, contrary to international standards.

¹² KOMS 2025

¹³ Amnesty International Dec 2024

¹⁴ N1 2024b Aug 2024

¹⁵ Danas 2024b

¹⁶ Insajder 2024

¹⁷ Human Rights Action 2020

¹⁸ Slobodna Evropa 2024e

Compared to 2023, where similar issues were noted, 2024 showed an intensification of these practices with more arrests and police actions against protesters.

In 2024, the authorities banned public assemblies in Serbia. One illustrative case was the ban on the 'Mirëdita, Dobar Dan' festival, that has since 2014 been held once a year, bringing together artists, human rights defenders, peace activists and public figures from Kosovo and Serbia, with the goal to foster cooperation and peace building. The Ministry of Internal Affairs prohibited all festival events, violating the Constitution of Serbia, and the rights to freedoms of expression and assembly. This ban followed a hate campaign by state officials.¹⁹ Another example was the banning of the 'Kikinda Short' literary festival by city authorities, who labelled it «anti-Serbian».²⁰

The key challenges that have remained include a lack of accountability for police misconduct, the misuse of legal procedures to target activists, and the chilling effect of these actions on civic participation. Despite the existence of legal guarantees, the practical implementation reveals a shrinking space for peaceful assembly in Serbia.

Freedom of expression

In 2024, Serbia did not enact significant legislative changes directly affecting the freedom of expression. However, incidents and governmental actions during the year have raised concerns about the practical enforcement of this right, suggesting a divergence from international human rights standards.

The legislative framework continues to permit forms of state ownership that impede genuine media independence and pluralism, providing the possibility for the for-profit corporation carrying out electronic communication activities established by the State to co-own and establish media outlets. Heightened incidents of journalists being prevented from carrying out their work safely and freely place Serbia even further from compliance with international guarantees on freedom of expression.

Reports indicate that Serbian authorities have employed spyware, such as NeviSpy, to monitor the activities of activists and journalists. This spyware enables surveillance by capturing screenshots and copying contact lists from mobile phones, with the data being uploaded to government-controlled servers. Notably, the deployment of such surveillance tools has been facilitated by technology from companies like the Israeli firm Cellebrite, which has provided phone-cracking devices to Serbian authorities.²¹

These surveillance practices have raised serious concerns among international human rights organisations. Amnesty International has highlighted that such actions represent a direct attack on fundamental freedoms, including the right to privacy and freedom of expression. The organisation has called on the Serbian government to cease these practices, provide remedies to the victims, and hold those responsible accountable.²²

Given these developments, it is evident that while Serbia's laws may formally align with international human rights standards, the practices in 2024 have deviated from these norms. The state's surveillance activities are inconsistent with the principles enshrined in international human rights law, particularly regarding the protection of freedom of expression.

Attacks on journalists persisted throughout 2024, with particular concern regarding physical assaults, as well as targeting and pressure from high-ranking government officials.

Pressures mainly came from public officials and representatives of political parties, who insulted journalists or «explained» to them how to do their job. In 2024, the Independent Journalists Association of Serbia (NUNS) recorded a total of 166 attacks on journalists including 17 physical attacks, 6 attacks on property, 73 cases of pressure and 70 verbal threats.²³ There are numerous reports of physical assaults,

¹⁹ Nova.rs 2024c

²⁰ N1 2024c

²¹ Reuters 2024

²² AP 2024

²³ NUNS database on attacks on journalists <https://www.bazenuns.rs/srpski/napadi-na-novinare>

online harassment, and legal actions against journalists, including months-long campaign attacks and threats to journalists Dinko Gruhonjić and Ana Lalić Hegediš.²⁴

According to the Freedom House report, 'The Struggle for Rights', Serbia has shifted from being classified as «free» to «partially free,» with its score dropping from 60/100 in 2023 to 57/100 in 2024. The report highlights increasing media suppression, attacks on journalists, and the dominance of pro-government narratives, particularly during election periods. It also notes the use of SLAPP lawsuits to intimidate independent media.²⁵

The Supreme Court, in case Rev 13695/2024, ruled in favour of press freedom, emphasising that public access to politically relevant information outweighs concerns regarding personal reputation. It upheld that critical commentary, especially in public debates, should not be restricted by the State. However, the Constitutional Court took a different stance in case UŽ 2006/2022, rejecting a complaint from activist A.P., who was fined for defamation after calling a public official a «miserable wretch» ("bednik" in Serbian) on social media. The court ruled that the comments exceeded permissible criticism and violated the official's dignity, although a dissenting judge warned of potential chilling effects on public discourse.

The investigative portal KRIK was ordered to pay RSD 850,000 (approximately EUR 7,200) in compensation and trial costs after losing two court cases (the causes of the action were damage to reputation and honour, and violation of the presumption of innocence). KRIK filed a constitutional complaint and an appeal to the Supreme Court.²⁶

The Court of Appeal in Belgrade acquitted four defendants previously convicted for the murder of journalist Slavko Ćuruvija, a move criticized by journalists' associations.²⁷ The previous defendants in the murder of Slavko Ćuruvija have sued the foundation named after the murdered journalist over a statement expressing disagreement with the acquittal in his murder. They are suing Foundation Slavko Ćuruvija on the grounds of inflicted mental pain, and injury to reputation, honour and human rights, and are seeking compensation of RSD 500,000 (approximately EUR 4,250) each. The process is ongoing.²⁸

In the Reporters Without Borders Country Profile for 2024, the acquittal on appeal in 2024 of those accused of murdering newspaper publisher Slavko Ćuruvija in 1999 was seen as emblematic of the impunity of crimes committed against journalists.²⁹ Other findings include the presence of high-quality investigative journalism in Serbia, a media landscape heavily influenced by political pressures, fake news, and propaganda. The political climate remains hostile to journalists, who frequently face attacks from government officials and restrictions on access to public information. Although the legal framework guarantees freedom of expression, journalists often self-censor, and the judiciary has yet to demonstrate its independence in handling cases of violence and SLAPP lawsuits against the press. Financially, media outlets rely on advertising and opaque government subsidies, which are controlled by the ruling elite. Media concentration is an increasing concern, with state-owned Telekom Srbija and privately owned SBB competing for market dominance. Women journalists, as well as those covering sensitive issues like migrants and human rights defenders, face additional harassment, particularly from far-right groups.³⁰

In 2024, Serbia dropped 7 additional places, from 91 in 2023 to 98 in the World Press Index.

²⁴ Slobodna Evropa 2024g

²⁵ https://freedomhouse.org/sites/default/files/2025-02/FITW_World_2025_Feb.2025.pdf

²⁶ Javni Servis 2024

²⁷ Cenolovka 2024

²⁸ Slavko Ćuruvija Foundation 2024

²⁹ RSF 2024

³⁰ RSF 2024

SO 1.2. Public authorities protect CSOs from interference and attacks and respect their right to privacy.

Indicator 1.2.a: Extent to which CSOs have access to an effective remedy to challenge or seek review of decisions affecting exercise of their rights

2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

There have been no changes in legal regulations regarding an effective remedy to challenge or seek review of decisions affecting the exercise of CSO rights during 2024. The primary weaknesses listed below persist. The Serbian legal system does not provide CSOs with special legal remedies distinct from those available to other citizens and legal entities. In numerous instances, legal remedies have been available only after a decision has already been made and its consequences have taken effect. Rather than offering a way to prevent or suspend harmful actions, legal remedies have been rendered ineffective at offering timely relief. This issue is particularly notable in the case of the Administrative Court, which lacks a specific deadline for deciding on lawsuits against decisions, such as those prohibiting peaceful assembly. Furthermore, even if a legal remedy successfully proves that the decision to ban an assembly was unlawful, there remains no effective legal remedy to compensate for the damages incurred due to the violation of the right to peaceful assembly.

During 2024, the situation regarding CSO access to effective remedies in Serbia has generally worsened. Use of SLAPP lawsuits continued and there were numerous reports of verbal attacks, threats, and physical intimidation against journalists and activists. For instance, journalists from KRIK faced court verdicts and significant financial penalties,³¹ while the editor of a pro-regime tabloid physically assaulted a journalist from the independent weekly 'Radar'.³² The Pride Info Center was vandalised³³. Additionally, an anonymous group established the 'Kopaćemo' ('We will dig') website, where they published a 'Register of Ecological Terrorists' which targeted environmental activists³⁴. Some of the targeted activists filed a criminal complaint against the unknown individuals behind 'Kopaćemo' for labelling them as «ecological terrorists.» The Higher Public Prosecutor's Office in Belgrade rejected the case, stating it lacked elements of a criminal offence, but could qualify as defamation³⁵. Members of the Association of Agricultural Producers of Subotica were called in for «informative interviews» with the Security Information Agency (BIA) following farmers protests.³⁶ There were also cases of arrests of activists, including one pregnant woman,³⁷ for their social media activity and participation in protests, with many being interrogated on suspicion of calling for the violent overthrow of the constitutional order.

In a coordinated smear campaign following the environmental protest against lithium mining, fuelled by high-ranking officials, civil society has been accused of plotting a violent 'colour revolution' to take power with the support of the EU and the USA, even though both have publicly backed the lithium mining project. This claim, allegedly supported by intelligence provided by Chinese and Russian authorities, has been widely publicised.³⁸ The pro-government Informer, one of Serbia's largest outlets, aired multiple prime-time programmes claiming to expose alleged foreign financing of a coup. The programmes revealed sensitive information, likely provided by state agencies, including donors, specific financial transactions and details of employees of a CSO accused of leading the plot, including their salaries and photos.³⁹

³¹ Javni Servis 2024

³² RCMF 2024

³³ In September 2024, owing to the lack of financial and institutional support, Pride Info Center was closed. See Slobodna Evropa 2024f

³⁴ Danas 2024a

³⁵ Vreme 2024b

³⁶ N1 2024d

³⁷ Danas 2024c

³⁸ Nin 2024, Novosti 2024b, O21 2024

³⁹ Civicus 2024

The lack of accountability for these actions, combined with the absence of legal protections against unauthorised surveillance, demonstrates a systematic disregard for the rights of CSOs and activists. Instead of upholding democratic principles, public authorities have actively contributed to an atmosphere of fear, repression, and shrinking civic space.

Additionally, the use of Strategic Lawsuits Against Public Participation (SLAPP) aimed at excluding public participation is a concern. The Coalition Against SLAPPs in Europe (CASE) at the end of 2024 published a report with data collected in 2023. During 2023, Serbia, with a total of 10 verified SLAPP cases, was in the group of countries where a significant number of SLAPP lawsuits were recorded (the others being Italy (26), Romania (15) and Turkey (10)).⁴⁰ This creates an environment of impunity, making it harder for CSOs to challenge decisions affecting their rights.

Although legal (primarily judicial) and administrative remedies are formally available, civil society organisations in Serbia continue to face barriers in accessing them effectively, as was similarly recorded in the previous Assessment reports. Bureaucratic hurdles, including complex administrative requirements and lengthy judicial processes, often discourage organisations from seeking redress.

The current legal environment and practice in Serbia does not fully support CSOs in accessing effective remedies to challenge decisions affecting their rights. The lack of substantial government engagement, combined with instances of surveillance, suggests a misalignment with international human rights law standards.

The application of the Law Prohibiting Discrimination is inconsistent; and the lack of clearly defined sanctions and enforcement mechanisms, along with the absence of a specific legal protection regime and clear definitions of key terms, hinder effective protection for CSOs in Serbia.

Of the laws listed, only the Criminal Code has been amended in 2024 (Official Gazette RS, 94/2024).⁴¹

At first, the proposed amendments to the Draft Criminal Code, published in October 2024, introduced a new criminal offence of «publishing materials advising the commission of a criminal offence,» which could further endanger freedom of expression. Owing to strong public outcry, these amendments were deleted from the adopted version of the Code.

In the CSO survey, 21% of respondents said that in 2024 government authorities took decisions on their organisation which negatively impacted its ability to exercise its rights (compared to 25% in 2023, and 28.3% in 2021). The examples of those decisions expressed in the survey were the proposed «Foreign Agents» Law, the Ministry of Environmental Protection discontinuing its financial support to CSOs working on environmental issues, limited access to public Information – with authorities increasingly restricting access to crucial public documents and decision-making processes, Tax Administration decisions with negative financial impact, local government restrictions on CSO funding, denial of public space for activities – with CSOs being prevented from organising events in public spaces, and the exclusion of Foundations (endowments) from Public Funding Calls (Foundations have been declared ineligible for funding opportunities, despite legal eligibility).

Of those who said that government authorities took decisions on their organisation which negatively impacted its ability to exercise its rights in 2024, 4% of CSOs were able to effectively challenge government decisions which negatively impacted them through official, legal, judicial and administrative channels, while 69 % were unable to challenge decisions which negatively affected them. The responses of those that were not able to effectively challenge decisions highlight the multifaceted nature of the perceived challenges, from institutional abuse and state capture, a hostile political climate, lack of independent institutions or appeal mechanisms that can protect CSOs from discrimination or political pressure, and persistent media smears, to the inability to contest Tax Administration decisions

Meanwhile, 23% of respondents are still waiting for final decisions.

⁴⁰ CASE 2024c

⁴¹ https://www.paragraf.rs/izmene_i_dopune/281124-zakon-o-izmenama-i-dopunama-krivicnog-zakonika.html

Indicator 1.2.b: Extent to which CSOs are protected by law from threats, attacks, judicial harassment and discriminatory treatment, in particular:

- threats including intimidation, harassment, defamation, as well as hate speech online and offline;
- attacks including acts of violence, physical abuse, searches and damage to property;
- judicial harassment including arbitrary arrest and detention, unlawful interference with communications, and abuse of criminal, civil and administrative proceedings;
- or threats thereof;
- discriminatory treatment, including disproportionate reporting requirements for CSOs.

2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

Public authorities in Serbia have not protected civil society organisations (CSOs) from attacks and interference. Instead, they have created a hostile environment by participating in smear campaigns and surveillance. High-ranking officials have labelled CSOs as foreign agents, damaging their legitimacy. Authorities have also ignored violent attacks on activists, including physical assaults and threats from pro-government media. Privacy violations have increased, with activists' personal data being leaked and state security agencies using spyware to monitor them.

Serbia's legal framework still lacks adequate protection for CSOs against threats, attacks, and discrimination. The Criminal Code, Law on Public Information and Media, Law on Prohibition of Discrimination, Law on Police, and the Constitution all contain significant shortcomings. There is no specific legal regime for CSO protection, and they are treated like any other entity without special safeguards. The law does not offer specific protections against arbitrary arrest, interference with communications, or legal harassment, including SLAPP lawsuits. Proceedings involving CSOs often face delays, and even when convictions occur, protective measures for CSOs remain inadequate.

Of the laws listed, only the Criminal Code has been amended in 2024 (Official Gazette RS, 94/2024).⁴² The final enacted amendments modify only two areas in the existing Criminal Code of the Republic of Serbia:

1. Article 297 ("Serious offences against public traffic safety") – The punishment ranges are increased.
2. New Articles 344b, 344v, and 344g – These introduce criminal offences involving attacks on employees (and/or their families) in educational, healthcare, and social protection institutions.

Although enacted, these amendments do not explicitly reference CSOs, and some of the added provisions could affect their activities if a CSO operates or collaborates with schools, health centres, or social welfare institutions.

Each new article sets out specific prison terms for physically assaulting or threatening an employee/family member, or damaging their property, when the attack is connected to the employee's professional duties.

Some nonprofits run or support private schools, homes for the elderly, youth centres, or shelters. Hypothetically, if these CSO's employees or volunteers are officially recognised as staff under the relevant education/health/social statutes, they might benefit from enhanced criminal law protection against attacks. Conversely, if a CSO organises volunteer programmes inside these institutions, it must ensure staff or volunteers understand the potential legal protections (and obligations) under these provisions.

⁴² https://www.paragraf.rs/izmene_i_dopune/281124-zakon-o-izmenama-i-dopunama-krivicnog-zakonika.html

Indicator 1.2.c: Proportion of CSOs that operate effectively without threats, attacks, judicial harassment, in terms of: - number of complaints concerning lack of protection of CSOs;

- number of complaints concerning lack of protection of CSOs;
- number of attacks on CSOs and their members;
- number of instances of damage to property;
- number of instances when CSO offices were unlawfully searched, or subjected to inspections;
- number of instances of interference with the communications of CSOs.

The results of the CSO survey indicate that 22% of CSOs experienced threats, attacks, judicial harassment, and/or discriminatory treatment in 2024, compared to 29% in 2023 and 31% in 2021. In 2024, 19% of respondents reported that their organisations and/or members were subjected to threats or physical attacks (28% in 2023 and 30% in 2021).

Additionally, 6% of CSOs had their organisation subjected to threats or physical attacks (8% in 2023, and 12% in 2021). Furthermore, 5% of CSOs had their members subjected to threats or physical attacks (8% in 2023, and 10% in 2021), while 8% of CSOs reported that both the organisation and its members were subjected to threats or physical attacks (9% in 2023, and 8% in 2021).

The severity of the threats faced by certain civil society organisations in Serbia has intensified, with reported incidents including public attacks by high-ranking government officials such as ministers and MPs, online harassment from pro-government social media groups and bot networks, and selective law enforcement through legal harassment and prosecutorial questioning. Organisations and activists have also reported direct threats of job loss, exile, or physical harm, illegal surveillance including cell phone monitoring, and death threats via email or in-person confrontations. Journalists remain a key target, with at least 168 attacks recorded in 2024 by the Independent Journalist Association of Serbia (NUNS), while violence has also been reported against activists working on issues such as animal rights, human trafficking, and minority rights.

In 2024, 7% of CSOs submitted an official complaint because they were denied protection when they had submitted a complaint when their organisation (and/or their members) were subjected to threats or physical attacks, similarly to 2023 when this percentage was 8%. In 2021, 10% of CSOs submitted an official complaint.

Five percent of the respondents said that their organisation or its members did not submit an official complaint because they had complained in the past and the response by the authorities was not effective, whilst 2% of respondents said that their organisation or its members did not submit an official complaint because they felt their safety would be compromised if they did so. One percent of CSOs did not know how to submit an official complaint.

In 2024, 7% of CSOs experienced property damage as part of the threats and physical attacks against their organisation and/or members. One percent of respondents had their offices subjected to unlawful searches or unlawful inspections. Finally, 7% of CSOs believe that the authorities interfered with the communications of their organisation in 2024.

Between November 2024 and January 2025, the repression of youth activists in Serbia intensified significantly, according to a revised report by the National Youth Council of Serbia (KOMS). Despite earlier warnings, institutions failed to act, allowing violations to worsen—particularly after the student-led protests following the Nevi Sad Railway Station collapse. Authorities responded to demands for accountability with arrests, intimidation, and smear campaigns. Activists faced physical violence, threats, illegal surveillance, and public exposure of personal information, including from state-aligned media and pro-government groups. Even foreign activists were interrogated or deported. A climate of fear deepened as young people were portrayed as «foreign agents,» pushing nearly half of youth to consider emigration. In protest against institutional inaction, KOMS withdrew from government advisory bodies, urging stronger legal safeguards and alignment with European human rights standards, amid a growing rift between civil society and the state.⁴³

⁴³ KOMS 2025

The ongoing violations not only threaten youth activism, but also contribute to a broader culture of violence and repression in Serbia. Without urgent action to restore trust and ensure legal protections, the divide between young people and institutions will continue to widen, undermining prospects for social stability and democratic engagement. In the survey, implemented for the purpose of including the view of public administration representatives, a majority of public administration representatives consider that the extent to which CSOs were able to operate effectively without threats, attacks, judicial harassment and discriminatory treatment in 2024 was sufficient or very sufficient.

SO 1.3. Measures used to fight extremism, terrorism, money-laundering or corruption are targeted and proportionate, in line with the risk-based approach, and respect human rights standards on freedom of association, assembly and expression

Indicator 1.3.a: Extent to which laws to combat extremism, terrorism, money-laundering and corruption do not unduly restrict legitimate activities of CSOs.

2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

In 2024, Serbia implemented amendments to the Law on the Prevention of Money Laundering and Financing of Terrorism⁴⁴, introducing stricter regulations on cash transactions and expanding the scope of entities subject to compliance. While these legislative changes aim to align Serbia’s framework with international standards, there are possible concerns regarding their impact on civil society organisations (CSOs).

The law is primarily aimed at financial institutions and commercial entities, imposing strict risk-based assessments that do not adequately account for the unique funding patterns and organisational characteristics of non-profit CSOs. Many of these organisations rely on donations, grants, and public funds, which may be unfairly classified as high-risk under a regime designed for profit-seeking enterprises. This misalignment results in a disproportionate regulatory burden, as the law does not contain tailored provisions or exemptions for CSOs operating in the public interest. Furthermore, the lack of procedural transparency of the risk-classification process and of the availability of effective remedies for challenging such classifications add to the obstacles. The legislative framework has been strengthened; however, the application of these laws, particularly concerning additional compliance requirements and the treatment of CSOs, raises human rights concerns. Recent amendments introduce stricter anti-money laundering (AML) and counter-terrorism financing (CTF) measures, expanding compliance obligations for civil society organizations (CSOs), particularly those with international activities, complex structures, or foreign funding.

- **Expanded Definition of Beneficial Owner (Article 3, Paragraph 1, Point 10)**
Broadens the scope of who qualifies as a beneficial owner to include individuals with indirect control or those on whose behalf transactions are conducted, increasing scrutiny of CSOs’ ownership and financial flows.
- **Enhanced Due Diligence for High-Risk Entities (Article 35)**
Requires CSOs operating in sensitive areas or receiving foreign funds to implement stronger internal controls and provide additional documentation during financial transactions.

44 Law on Amendments to the Law on the Prevention of Money Laundering and Financing of Terrorism (Official Gazette RS, No. 94/2024)

- **Cash Payment Restrictions (Article 46)**
Prohibits cash payments over €10,000, including donations, loans, and real estate, pushing CSOs toward formal banking systems and potentially increasing administrative overhead.
- **Regulation of Digital Asset Use (Article 36)**
Imposes new compliance rules for CSOs using cryptocurrencies or other digital assets, aligning with institutional standards for financial integrity.
- **Risk-Based Classification (Article 42)**
Introduces simplified procedures for low-risk entities and stricter obligations for high-risk ones. Risk assessments are however internal and not publicly transparent, leaving CSOs uncertain about their classification.
- **Expanded Record-Keeping Requirements (Article 95)**
Requires retention of client files, correspondence, and analytical records, which must be accessible to oversight authorities upon request.
- **Disclosure of Governance Information (Article 99)**
Mandates that CSOs submit detailed information on top management, founding documents, and operational records—more extensive than what is currently required in the CSO Register.
- **Increased Penalties for Non-Compliance (Articles 115 & 115a)**
Introduces substantial fines for legal violations, including penalties of up to 12 times monthly income for CSO leaders.

Indicator 1.3.b: The proportion of CSOs whose ability to undertake legitimate activities is not restricted by the implementation of laws to combat extremism, terrorism, money-laundering and corruption, and in particular by:

- being judicially harassed for their alleged connections with extremism, terrorism, money-laundering and corruption;
- discriminatory restrictions placed on funding,
- authorities or banks preventing them from opening bank accounts, sending or receiving money.

In 2024, 85% of CSOs reported that their ability to conduct legitimate activities was not hindered by laws aimed at combatting extremism, terrorism, money-laundering, and corruption, whereas 9% experienced restrictions. Comparatively, in 2023, 87% of CSOs indicated no hindrance from such laws, while 6% did. In 2021, 78% were not restricted, and 17% were.

Two percent of respondents indicated that their organisation and its members faced judicial harassment in 2024 owing to alleged connections with extremism, terrorism, money-laundering, or corruption (compared with none in 2023, and 5% in 2021). No respondent reported either the organisation or its members being subjected to this type of harassment (compared to 2% in 2023, and 3.4% in 2021).

6% of CSOs stated in 2024 that their organisation faced discriminatory restrictions due to funding sources (compared to 5% in 2023, and 8.5% in 2021). Additionally, 2% of CSOs were prevented by government authorities or banks from opening a bank account, sending, or receiving money (the same percentage as in 2023, compared with 6.8% in 2021).

SO 1.4. Public authorities treat all CSOs equally with regards to their operations, and equitably with other entities (such as businesses)

Indicator 1.4.a Extent to which laws (1) do not require CSOs to submit more reports and information, and (2) do not submit CSOs to more inspections and sanctions, than business entities, all else being equal.

2024	4 – meets most standards
2023	4 – meets most standards
2021	4 – meets most standards

Serbia's primary laws governing Civil Society Organisation (CSO) reporting obligations comprise the Law on Associations, Law on Accounting, Law on Auditing, Law on Public Information and Media, and Law on Tax Procedure and Tax Administration. These regulations encompass financial reporting, activity disclosure, and tax compliance, with specific requirements varying based on a CSO's legal form and activities.

The significant legislative development during the reporting period was the 2024 Amendments to the Law on Tax Procedure and Tax Administration. These amendments introduced several provisions that may impact CSOs. Although nonprofits are not explicitly mentioned, the law applies universally to all legal entities, including CSOs.

One notable change is the establishment of a new electronic database for natural persons maintained by the Tax Administration (Article 28a), which may necessitate CSOs having to submit the personal data of their staff, volunteers, or collaborators, thereby increasing their administrative responsibilities.

Additionally, revised tax-filing and penalty regulations impose stricter fines for delayed or missing tax returns, which could affect CSOs even if they have minimal taxable income.

Overall, these amendments enhance reporting obligations and financial risks for CSOs, as they do for other legal entities.

SO 1.5. Central and/or local public authorities have enabling policies and rules for small community organisations and civic initiatives (grass-roots organisations)

Indicator 1.5.a: Small community/local organisations and civic initiatives are allowed to operate by law without registering.

2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

The legal framework maintains full freedom of association, allowing small community/local organisations and civic initiatives to operate without requiring registration.

Indicator 1.5.b: In law, unregistered small community/local organisations and civic initiatives enjoy the same right to participation in decision-making processes as registered CSOs.

2024	4 – meets most standards
2023	5 – fully meets standards
2021	5 – fully meets standards

In accordance with the provisions of the Constitution and the Law on Associations, unregistered small community/local organisations and civic initiatives have the same rights as their registered counterparts in participating in decision-making processes. Compared to 2023, there are no changes in the legal framework regarding the participation of unregistered organisations. It is notable that there is no explicit legal requirement for registration as a prerequisite for participating in the decision-making process; unregistered organisations and initiatives are considered equal to registered ones in this aspect. Nonetheless, community organisations encounter challenges in accessing public decision-making processes. The requirement that CSOs have to be registered for a certain time to be eligible for participation in some working groups creates a discriminatory barrier against many newer, active CSOs as well as nonregistered groups and movements. This was observed in the case of the Ministry of Environmental Protection's call for nominations for the Working Group for the Draft Law on Air Protection⁴⁵, which set a requirement of eight years of registration, excluding many newer organisations and unregistered groups dealing with air quality.

SO 1.6. All CSOs are free to solicit and receive funding.

Indicator 1.6.a: Extent to which relevant laws allow CSOs to seek a broad range of funding, including from abroad, without undue restrictions, as regards:

- cash and in-kind donations from all sources;
- funding from domestic public bodies;
- funding from institutional, corporate or individual donors; } funding from foreign governments or multilateral agencies..

2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

The legal framework continues to allow for a broad range of funding opportunities, including from both domestic and foreign sources, without imposing undue restrictions. This encompasses various forms of funding, such as cash and in-kind donations from all sources, funding from domestic public bodies, support from institutional, corporate, or individual donors, as well as funding from foreign governments or multilateral agencies. Importantly, there are no additional requirements mandated for CSOs receiving funding from abroad.

On 29 November 2024, a draft law was submitted to the Serbian Parliament proposing the establishment of a registry for «agents of foreign influence.» The proposed law, introduced by the Socialist Movement Party, raised significant public concern.

The draft law establishes a special registry for nonprofit organisations that receive more than 50% of their

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funding from foreign sources or engage in activities deemed as political influence. These organisations must register as “foreign influence agents,” a designation that could harm their public perception and impose administrative burdens. The definition of political activity is broad, including interactions with state bodies, policy advocacy, and election-related actions. Any CSO labelled a “foreign influence agent” must mark all public communications accordingly. Strict reporting requirements mandate detailed financial disclosures every six months, potentially deterring foreign donors. The draft law grants the Ministry of Justice authority to inspect, monitor, and penalize CSOs, with routine and extraordinary inspections possible. Noncompliance risks fines, suspension, or criminal charges. Organisations failing to register may face bans, and leaders could be held criminally liable.

Overall, the draft law threatens CSO independence and financial sustainability, significantly increasing state control, administrative burdens, and diminishing freedom of association.⁴⁶

Although the draft law poses serious concerns regarding CSO independence, freedom of association, and financial sustainability, it had not been adopted by the time this report was completed and remains at an early stage of the legislative process. Consequently, no formal legal restrictions have been imposed to date on CSOs’ access to funding from the sources mentioned above. Given that the draft law is still under parliamentary consideration and has not yet resulted in enforceable measures, the grade for this indicator has not been downgraded. Nevertheless, its introduction signals a potentially significant shift in the regulatory environment that warrants close monitoring.

Indicator 1.6.b: Proportion of CSOs that can access a broad range of funding without undue government interference.

In the CSO survey, 95% of CSOs reported that in 2024 they had not experienced government interference that prevented their organisations from accessing any type of funding. In 2023, 91% of CSOs reported similarly, while in 2021, this figure was 86%. Only 1% of CSOs in both 2024 and 2023 experienced arbitrary audits, compared to 5% in 2021.

SO 1.7. Public financial and non-financial support to CSOs is available in IPA beneficiaries, and provided in a transparent, accountable, fair and non-discriminatory manner

Indicator 1.7.a: The level of public funding available for CSOs and associations is clearly articulated in laws and regulations, and the rights and duties of the state body invested with the ability to set and revise the level of public funding available is clearly defined in law.

2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

The primary laws that regulate public funding levels for CSOs include the Law on Associations, the Law on Culture, the Law on Public Information and Media, the Law on the Budget System, and the Law on Ministries, as well as the bylaw or Regulation on Funds to Encourage Programmes or Provide Missing Funds to Finance Programmes of Public Interest Implemented by Associations. These are complemented by the annual Law on the Budget which allocates specific amounts to various government bodies and programmes, indirectly determining the potential pool of funds available for CSOs through diverse calls.

The current legal framework does not offer a clear and precise indication of the level of public funding available to CSOs. None of the statutes governing potential CSO funding stipulate a specific amount of public funds accessible to CSOs each year, nor a well-defined mechanism to ensure these resources

46 <https://www.eesc.europa.eu/en/news-media/presentations/serbia-draft-law-foreign-agents-risks-democratic-and-eu-integration-goals>

are efficiently and transparently directed towards CSOs. The framework omits provisions on minimum and maximum funding amounts, suffers from inadequate coordination between state bodies, lacks transparency in fund allocation, and fails to clearly delineate the role of the state body responsible for setting and revising funding levels.

In 2024, although the Budget System Law was amended, there were no changes concerning the level of public funding available for CSOs.

Indicator 1.7.b: Percentage of public budget actually disbursed to CSOs in a year.

The exact data on the percentage of the public budget disbursed is not available.

Based on the data presented on the online database of public calls created by BIRN Serbia, in partnership with Civic Initiatives and a team of researchers from 16 local civil society organisations, a total of RSD 5,997,354,475 budget (approximately EUR 51,260,000) was awarded through 576 Public Calls, and a total of 13,060 projects were financed in 2024. Those funds include all levels of public funding- national, provincial and local.

The database enables tracking of budget spending in the sectors of media and public information, culture and arts, civil society organisations, and youth. All those sectors in 2023 received RSD 6,647,277,597 (approximately EUR 56,815,000)

Out of this total amount distributed to Media, Civil Society, Culture and Youth, civil society in 2024 received RSD 2,928 billion (approximately EUR 25 million), compared to RSD 2,800 billion (approximately EUR 24 million) in 2023.⁴⁷ According to the law on the budget for 2024, the total revenues amount to RSD 2,040,9 billion (approximately EUR 17,5 billion, and expenditures to RSD 2,238 billion (approximately EUR 19 billion).⁴⁸

These figures are to be compared with the Budget Law for the year 2023, which anticipated total revenues amounting to RSD 1,843,4 billion (approximately EUR 15,7 billion) and total expenditures and outlays amounting to RSD 2,107,4 billion RSD (approximately EUR 18 billion).⁴⁹

Indicator 1.7.c: Extent to which legal provisions regulating the award of public funding to CSOs ensure that:

- funding criteria are clearly defined, objective and publicly announced;
- evaluation of proposals is clear and impartial;
- conflict of interest is clearly regulated;
- reporting requirements are clear and proportionate.

2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

In 2024, the situation showed no improvement compared to prior reports, with significant deficiencies persisting within the current legal framework. The most critical procedural issues include the absence of an evaluation mechanism for achievements and oversight of narrative and financial reports, the publication of non-standardised and inconsistent decisions concerning fund allocation, an inadequate appeals process unable to prevent abuses, and insufficient transparency in the operations of the evaluation committees that award funds.

The Fiscal Council reported the problematic allocation of funds from the budget reserve to the Football

⁴⁷ <https://birn.rs/baza-o-javnim-konkursima/>

⁴⁸ <https://www.blic.rs/biznis/skupstina-srbije-usvojila-budzet-za-2024-godinu/z4y54t0>

⁴⁹ <https://www.srbija.gov.rs/vest/670078/skupstina-srbije-usvojila-budzet-za-2023-godinu.php>

Association of Serbia (FSS) and other organisations. Significant amounts were reallocated without proper evaluation.⁵⁰

In March 2024, Coalition Openly About Competitions (OKO) criticised the Ministry of Family Care and Demography and the Ministry of Education for awarding funds to organisations that do not even meet the formal conditions of the Call, or changed the area of goals in their statutes immediately before the announcement of the Call, while half of the awarded organisations do not have a single channel of communication with the public and target groups, and do not even meet the minimum requirement of transparency.⁵¹

Key cultural organisations in Serbia criticised the Ministry of Culture for not announcing the results of the Call for supporting cultural projects on time in 2024, and the City of Belgrade for not even announcing the Call. This delay jeopardises the operations of numerous artistic and cultural programmes and organisations, leading to protests and appeals for unity among cultural workers⁵². Analysis done in 2024 by the Independent Cultural scene of Serbia shows the main problems related to funding procedures in the cultural sector that pertain to other sectors. These include:

- inadequate and non-transparent distribution of the existing funds, without the involvement of relevant stakeholders in the planning process;
- disregard for legal regulations and failure to act in accordance with the Decree that should regulate the implementation of public Calls;
- inefficiency, lack of transparency, and outdated procedures for public Calls;
- allocation of funds based on discretionary decisions by authorities (without any public oversight);
- lack of communication with applicants and ineffective evaluation of results of publicly funded projects at the end of the project cycle.⁵³

Coalition OKO criticised the Gender Equality Call launched by the Minister without Portfolio in charge of coordinating activities in the field of gender equality, issued in October 2024. The public call for RSD 55 million (approximately EUR 470,000) to prevent family and peer violence has raised concerns due to the very short period allocated for project implementation. The Coalition estimated that approved projects would need to be completed within a 12-day⁵⁴ window to meet the legally prescribed deadline at the beginning of December for all projects in the fiscal year. Additionally, there were concerns regarding the scoring system: out of a total of 100 points for a project proposal, only 5 points can be awarded for the applicant's previous experience, and a maximum of 10 points for the competencies of the project team. This approach minimises the significance of the expertise, knowledge, and long-term experience of women's organisations and other associations working with victims of violence.⁵⁵

The Minister without Portfolio in charge of coordinating activities in the field of gender equality, as well as the Minister without Portfolio in charge of reconciliation, regional cooperation and social stability, were criticised for allocating funds to less visible or politically affiliated organisations. Specific issues included:

- Extensions to submission deadlines during the Call process;
- Doubling of funding amounts without explanation during the Call process;
- Funding awarded to associations with no online presence or recent activity, raising questions about accountability and transparency.⁵⁶

50 <https://novaekonomija.rs/vesti-iz-zemlje/fudbalskom-savezu-srbije-jos-32-miliona-evra-iz-budzetske-rezerve>
<https://www.danas.rs/sport/fudbalski-klub-partizan-kosarkaski-savez-srbije-infrastrukturni-projekti/>

51 <https://www.gradjanske.org/ministarstva-da-preispitaju-ocene-projekata-udruzenja-predlozenih-za-finansiranje-u-2024/>

52 <https://www.masina.rs/nkss-ministarstvo-i-sekretarijat-za-kulturu-nanose-stetu-nezavisnoj-sceni/>

53 <https://nezavisnakultura.net/wp-content/uploads/2024/12/2-online-predlozi-mera-za-unapredjenje-konkursa.pdf>

54 Given that the Call was issued in October, the time left for the preparation of proposals and evaluation of the proposals signalled that the implementation of the projects cannot start until mid-November. All projects starting in any given year must be concluded and reports submitted by the beginning of December.

55 <https://www.gradjanske.org/ministarstva-da-preispitaju-ocene-projekata-udruzenja-predlozenih-za-finansiranje-u-2024/>

56 Civic Initiatives 2024b

By September 2024, a year after criminal charges were filed for suspected misuse of millions of euros in public calls by the Ministry for Family and Demography, no significant legal action had been taken. Civil society organisations, including the Coalition Openly About Competitions (OKO), demanded accountability and transparency from the Prosecutor's Office for Organised Crime. Their charges involve officials, organisations, and intermediaries accused of misconduct, including abuse of official position, falsification of facts to obtain funds, and influence trading. Despite evidence and investigations, progress in the case has been slow, raising concerns about the lack of accountability.⁵⁷

An analysis of public funding for gender equality was conducted between August 2024 and January 2025⁵⁸. As part of the research, FemPlatz conducted a desk analysis of selected projects funded through Calls from the Ministry for Family Care and Demography and the Provincial Secretariat for Social Policy, Demography, and Gender Equality. The analysis also covered budget allocations for associations dealing with gender equality in nine municipalities and cities. All findings relate to the budget periods of 2023 and 2024.

The analysis revealed that over 80% of the funds were awarded to phantom organisations. The public funding process is highly non-transparent, especially regarding project evaluation. There are no official decisions on the appointment of evaluation committees, and the civil society is not involved in the process. Moreover, the experience and expertise of associations in relevant fields are often ignored, allowing organisations with no proven track record to receive funding.⁵⁹

Indicator 1.7.d: Central governments make the information on awards publicly available and sufficiently detailed to identify individual awards.

2024	3 – moderately meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

The availability of data on awards has been improved with the introduction of the Calendar of Calls by the Ministry of Human and Minority Rights and Social Dialogue <https://kalendarkonkursa.minijmpdd.gov.rs/>. The Calendar provides information on upcoming and implemented calls for funding civil society organisations by national institutions and local self-governments. Although the Calendar is designed to offer detailed information on each call and awarded grants, the amount of information provided on awarded grants varies between the institutions. Some calls include comprehensive details on awarded grants, while others have limited or no information available. It is important to continue efforts to make all award information publicly accessible to further improve the grade of this indicator.

In a survey conducted with representatives of public institutions, the vast majority of respondents deemed the extent to which the relevant authorities disclosed information on the awarding of public funding to CSOs as sufficiently or fully public.

⁵⁷ Civic Initiatives 2024c

⁵⁸ The analysis was conducted as part of the project 'Strengthening Transparency of Public Funding through Analysis of Phantom and GON-GO Organizations', implemented jointly by Civic Initiatives, the Balkan Investigative Reporting Network (BIRN) Serbia, and FemPlatz.

⁵⁹ Civic Initiatives 2025b

Indicator 1.7.e: Proportion of CSOs indicating that the provision of domestic public funds is transparent, fair, and non-discriminatory.

2024	1 – does not meet standards	5%
2023	1 – does not meet standards	5%
2021	1 – does not meet standards	10%

Similarly to the report for 2023, only 5% of CSOs consider the provision of domestic public funds in 2024 to be transparent and fair. In 2021, that percentage was 10%.

Eleven percent of CSOs (as compared to 9% in 2023, and 18.6% in 2021) consider that in 2024 the provision of public funds was sufficiently transparent or very transparent, meaning that it has been carried out openly with full information publicly available, so that the public can trust the process. Seventy percent of CSOs stated that the provision of public funding to CSOs in 2024 was insufficiently transparent or not transparent at all.

Seventy-nine percent of CSOs considered the provision of public funds to be unfair or not sufficiently fair in 2024. Only 7 % of respondents (compared to 8% in 2023 and 13.6% in 2021) considered public funding to be fair in 2024, meaning that it had been provided by treating all CSOs equally without favouritism or discrimination.

On the other hand, in the survey that targeted representatives of public institutions, a significant majority of respondents considered the provision of public funds to CSOs that their institution was responsible for, to be transparent and fair.

Indicator 1.7.f: Public funding does not exclude CSOs on the basis of their constituency representation.

In the CSO survey, 12% of respondents indicated that their organisation's application for public funding was rejected because authorities did not want to fund the work with the people they serve and represent. This compares to 14% in 2023, and 4.5% who reported the same in the 2021 survey. In the survey targeting representatives of public institutions, the majority of respondents considered the provision of public funds to CSOs for which their institution was responsible to be inclusive.

SO 1.8. Individuals and corporations enjoy tax benefits for their donations to CSOs.

Indicator 1.8.a: Tax legislation allows for tax relief as regards:

- Individual giving
- Corporate giving

2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

The circumstances surrounding individual and corporate giving remained unchanged from the baseline report. Individual donors still do not receive tax benefits. Corporate donors are still eligible to claim a tax deduction of up to 5% of annual income for donations made towards qualifying public-benefit purposes.

Corporate donors are required to provide documentation of their donation (such as contracts, bank transfer information, or donation receipts), and additionally must submit proof that the recipient has used the donation for legitimate purposes.

Indicator 1.8.b: Proportion of private individuals who have given money to a CSO.

Year	Percentage of private individuals in Serbia who donated to a CSO
2024	43%
2023	41%
2021	60%

Data provided from CAF World Giving Index Report.⁶⁰

SO 1.9. Tax benefits are available to CSOs.

Indicator 1.9.a Extent to which applicable tax laws provide for the following:

- CSO income generated from grants, donations, and membership dues, income from economic activities, investment income, real property, gifts and inheritance is not subject to taxation;
- any excess revenue or profit generated through economic activity and used for mission-related purposes by CSOs is not subject to corporate income/profit tax.

2024	3– moderately meets standards
2023	3– moderately meets standards
2021	3– moderately meets standards

The legal framework has not changed since the baseline or previous report. CSOs are exempt from tax for donations up to RSD 100,000 (EUR 850). Donations exceeding this amount are taxable unless additional criteria are met, which are usually easy to fulfil.

⁶⁰ <https://www.cafonline.org/docs/default-source/in-side-giving/wgi/wgi2024.pdf>

CSOs are exempt from the Corporate Profit Tax Law, except when income from direct economic activities exceeds RSD 400,000 (EUR 3,400); above this threshold, a 15% tax rate applies, the same as for businesses. The Corporate Income Tax Law does not differentiate between mission-related and unrelated economic activities. Additionally, CSOs are exempt from property taxes on inherited or gifted property used exclusively for the public benefit purposes for which the organisation was established.

SO 1.10. The policies and legal environment provide incentives and facilitate volunteering for and employment in CSOs.

Indicator 1.10.a: Laws regulating volunteering are adopted.

2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

Throughout 2024, no progress had been made regarding the adoption of a new Law on Volunteering. The current law, adopted in 2010, remains in force, despite longstanding criticism from civil society organisations (CSOs) regarding its restrictive and overly bureaucratic approach to volunteering.

The Ministry of Labour, Employment, Veterans, and Social Affairs engaged in drafting a new Law on Volunteering, but the process was met with strong objections from civil society representatives involved in the working group. Concerns were raised about limited transparency, rushed consultations, and lack of meaningful discussion. The last recorded working group meeting took place on 18 May 2023, after which no further progress was made. The draft law was not forwarded for parliamentary procedure in 2024, nor were any additional working group meetings convened.

Indicator 1.10.b: Government volunteering strategies and programmes support volunteering for CSOs and have sufficient resources allocated for implementation.

2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	2 – minimally meets standards

Throughout 2024, no progress was made toward adopting a National Volunteering Strategy in Serbia. While volunteering remains recognised as important in existing strategic documents adopted in the previous period (Strategy for Creating an Enabling Environment for Civil Society 2022–2030, and Strategy for Youth in the Republic of Serbia for the Period 2023–2030), there have been no significant advances in terms of new government-led programmes or policies, nor funding mechanisms to systematically support volunteering.

Indicator 1.10.c: Proportion of CSOs that benefit from state employment strategies and programmes.

According to the CSO survey, 9% of CSOs reported benefiting from government employment programmes in 2024, compared to 12% in 2023 and 25% in 2021. The majority of CSOs benefiting from these measures indicated they benefited from programmes supporting first-time employment or internships, as well as programmes aimed at work activation for persons with disabilities.

Indicator 1.10.d: Proportion of CSOs that benefit from state volunteering strategies and programmes.

In 2024, there were no volunteering strategies and programmes in place.

Indicator 1.10.e: Proportion of employees in CSOs in relation to the total workforce.

According to the Labour Force survey data, the total active workforce in 2024 was 3,016,800.⁶¹ The employed population increased by 2.0%, reaching 2,897,500, while the unemployed population recorded a decline of 8.1% compared to the previous year, totalling 271,800.

The total number of employed in 2024 amounted to 2,368,948, presenting an increase of 0.4% in relation to the previous year, out of which 13,663 were registered as employed in the activities of associations.⁶² This number represented 0.58% of total employees (the same as in 2023, 2022 and 2021) and 0.45% of the total workforce (the same as in 2023, whilst in 2022, it was 0.44%, and in 2021, 0.43%).

Indicator 1.10.f: Percentage of people who have volunteered to give their time to an organisation.

Year	Percentage of the people volunteered their time to an organisation
2024	9%
2023	6%
2021	7%

Data provided from CAF World Giving Index Report.⁶³

⁶¹ Working age active population 15–64 years of age. <https://publikacije.stat.gov.rs/G2025/Pdf/G20255720.pdf>

⁶² <https://publikacije.stat.gov.rs/G2025/HtmlE/G20251025.html>

⁶³ <https://www.cafonline.org/docs/default-source/inside-giving/wgi/wgi2024.pdf>



Specific Objective 2

Strengthened cooperation and partnership between CSOs and public institutions.

SO 2.1. Public authorities and institutions include CSOs in decision- and policy-making processes.

Indicator 2.1.a: Laws, bylaws, strategies, other acts of public interest and policy reforms are effectively consulted with CSOs in that:

- CSOs have access to the draft document from the beginning of the drafting process to the end of the adoption procedure;
- At least 15 days are allowed for commenting before the draft document enters the adoption procedure;
- The use of extraordinary/expedited procedures to adopt legislation without allowing for consultation is an exception and duly justified;
- Reports on results of public consultations, including reasons for rejection of comments, are published in a timely fashion;
- Working groups members from CSOs are selected based on a public call, clear criteria and in line with equal treatment;
- Working group members from CSOs include representatives of society as a whole, including women's groups, LGBTIQ groups, migrant groups, minorities, disability groups, and others as appropriate, in line with the Human Rights Based Approach.

2024	2 – minimally meets standards
2023	1 – does not meet standards
2021	2 – minimally meets standards

During the reporting period, no significant changes were observed in the legal framework concerning the consultation process with Civil Society Organisations (CSOs) in the drafting and adoption of laws, by-laws, strategies, and other acts of public interest and policy reforms. Compared to 2023, challenges related to access to information, timely consultations, and arbitrary exclusion of CSOs persisted. The situation in 2024 indicates that CSOs continued to face difficulties in achieving meaningful participation in public decision-making.

The deficiencies in the legal framework highlighted in previous reports remain unchanged. The current legal structure continues formally and declaratively to support the involvement of CSOs in the decision-making process, yet it lacks any requirement to engage them during the initial stages of regulatory adoption, such as prior to conducting a public hearing.

When it comes to the implementation aspects, urgent procedures for law adoption have remained common, raising concerns about the adequacy of the consultation processes.

Based on the data collected and published by the 'Programme for improving the management of public policies and regulatory reform for the period 2021–2025', the percentage of laws adopted with a consultative process being carried out in 2024 was 58.3%⁶⁴. In 2021 this percentage was 44.4%, and

⁶⁴ <https://pujpr-monitoring.mduls.gov.rs/statistike.html?jnodeId=732&sid=18319&tab=indikator&depth=2>

in 2022 it was 29%, whilst in 2023, 52.8 %⁶⁵ of laws were adopted after including consultation with the public.

The share of adopted by-laws during the preparation of which a consultative process was carried out remain significantly lower – 29.7 % (compared to 21.4% in 2021, 30% in 2022, and 31.5% in 2023). The highest share pertained to documents of public policies, which in 100% of cases were accompanied by a consultative process in accordance with the Law on Planning System in 2024, the same as in 2022 and 2023 (in 2021, this percentage was 96.2%).

In the CSO survey implemented for the purpose of the Assessment, 24% of CSOs answered that the authorities effectively consulted their organisation in the drafting of laws, by-laws, strategies or acts of public interest and policy reforms (compared to 29% in 2021, and 18 % in 2023). The percentage of CSOs that consider their organisation has been effectively consulted is the main parameter for determining the grade of this indicator. Therefore, the change of this percentage to more than 20 percent determined raising the overall grade in comparison to the previous report.

Only 12 % of respondents in 2024 had access to the draft document from the beginning of the drafting process to the end of the adoption procedure (compared to 25 % in 2021, and 9% in 2023). Finally, 12 % of CSOs answered that their organisation had had at least 15 days available for commenting on the draft document before it entered the adoption procedure, which was the same as in 2023, whilst in 2021 this percentage was 20%.

When it comes to the inclusion of CSOs in working groups, the legal framework in Serbia does not mandate⁶⁶ that members of working groups from the civil society sector be selected based on public calls, clear criteria, and equal treatment. Although it sometimes occurs that members are appointed through a public call, this is not a legal requirement but rather at the discretion of the authorities. This lack of regulation can result in appointments being made based on subjective assessments or political connections, rather than expertise and relevant experience.

Additionally, Serbian laws do not stipulate the obligation for members of working groups from the civil sector to be chosen from diverse backgrounds. There are no provisions ensuring diversity among these group members. In cases of direct appointments, the process lacks transparency and may be influenced by subjective assessments and political considerations. Even when a public call is issued, there is no guarantee that the selection criteria will ensure diversity among working group members. Given the absence of legal provisions ensuring member diversity, it can be concluded that the current legal framework does not fully adhere to international human rights standards in this regard. There have been no changes to this situation in 2024. In the CSO survey, it is stated that 18% of CSOs had a representative of their organisation as a member of a working group tasked with the development of laws, by-laws, strategies or acts of public interest and policy reforms in 2024, compared to 14 % of CSOs in 2023, and 24% of CSOs in 2021.

The implementation of the mechanism of including CSOs in the activities of working groups is supported by the Ministry of Human and Minority Rights and Societal Dialogue that provides expert support to public authorities aiming to involve civil society organizations (CSOs) in the development of legislation and public policy documents. Based on the report prepared by the Ministry, the number of public calls published at the national level for membership in working groups and advisory bodies decreased

65 In the 'EUCSG Country Assessment Report', the percentage of laws for 2023 presented was 23%. This figure was later revised by the 'Programme for improving the management of public policies and regulatory reform for the period 2021–2025', after receiving additional contributions from the Ministries.

66 The 'Conclusion on the Guidelines for the Inclusion of Civil Society Organisations in Working Groups for Drafting Policy Documents and Regulations', directs state administration bodies towards implementing public calls based on pre-established criteria and equal opportunities for all participants, as a means of ensuring inclusive participation. This is however a recommendation, not an obligation.

in 2024 compared to previous years. In 2024, only 10 public calls were published⁶⁷, compared to 15 in 2023⁶⁸, 12 in 2022⁶⁹ and 18 in 2021⁷⁰. No state authority independently conducted a public call or followed the procedures prescribed by the Guidelines for the Inclusion of Civil Society Organisations in Working Groups for Drafting Public Policy Proposals and Legislative Drafts.

Out of a total of 54 established working groups, 22 did not include civil society organisations. In 32 working groups, civil society organisations actively participated; however, they were invited directly by the competent authority without applying the Guidelines.

A total of 152 civil society organisations were included in the work of the working groups through direct invitation, without adherence to the Guidelines. In contrast, 49 of CSOs were selected for participation in working groups through the application of the Guidelines and support by the Ministry of Human and Minority Rights through 10 public calls.⁷¹ The number of published public calls depends on the legislative activity of state administration bodies. For 2024, it is also necessary to take into account the fact that elections were held and the Government operated for part of the year in a technical mandate, which resulted in reduced legislative activity.

In the survey that targeted representatives of public institutions, almost half of respondents considered that CSOs were effectively consulted in the development of laws, by-laws, strategies, other acts of public interest and policy reforms for which their institution was responsible in 2024. Similarly, half of respondents considered that the public and CSOs were sufficiently informed of the opportunities to contribute to and participate in the development of laws, policies and strategies. The majority of respondents considered that the consultation processes with the public which took place in 2024 sufficiently took account of the views of all communities and groups affected by the laws, policies and strategies about which they were being consulted.

SO 2.2. Public authorities and institutions acknowledge the importance of civil society in societal policy debate and EU integration processes.

Indicator 2.2.a: Extent to which CSOs assess the attitude of public officials towards civil society as supportive.

2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

In the CSO survey, 11% of respondents in 2024 rated the attitude of public officials as supportive, compared to 6% in 2023, and 14% in 2021. Consistently with 2023, 82% of respondents in 2024 perceived public officials as not at all supportive or insufficiently supportive. This is nearly identical to the baseline survey, where 81% of respondents expressed the same view.

⁶⁷ The public calls covered the following areas: Air Protection Law (Ministry of Environmental Protection); Social Protection Strategy (Ministry of Labour, Employment, Veterans and Social Affairs); Law on Integrated Pollution Prevention and Control (Ministry of Environmental Protection); Programme for Industrial Safety (Ministry of Environmental Protection); Law on Combating Human Trafficking (Ministry of Interior); Amendments to the Legal Framework for Public Consultations (Republic Secretariat for Public Policies); Policy Document on Control of Small Arms and Light Weapons (2025–2030) – discontinued on account of absence of CSO applications; Civil Society Platform for Improving the Position of Roma – 22 CSOs joined; Law on Protection from Non-Ionizing Radiation (Ministry of Environmental Protection); Amendments to the Personal Data Protection Law (Ministry of Justice).

⁶⁸ <https://minijmpdd.gov.rs/wp-content/uploads/2024/04/Izvestaj-o-sprovedjenju-Smernica1932024.pdf>

⁶⁹ <https://minijmpdd.gov.rs/wp-content/uploads/2024/04/Izvestaj-o-primeni-Smernica-za-ukljucivanjeOCDu-radne-grupe-za-izradu-predloga-dokumenata-javnih-politika-i-nacrtadnosno-predloga-propisa-za2022.godine.pdf>

⁷⁰ <https://minijmpdd.gov.rs/wp-content/uploads/2024/04/Izvestaj-o-primeni-Smernica-za-ukljucivanjeOCDu-radne-grupe-za-izradu-predloga-dokumenata-javnih-politika-i-nacrtadnosno-predloga-propisa-tokom2021.godine-1.pdf>

⁷¹ <http://minijmpdd.gov.rs/wp-content/uploads/2025/03/izvestaj-2024-31.03-2024.docx>

Civil society in Serbia plays a significant but challenging role in the EU reform process. While CSOs actively engage in monitoring reforms, advocating for transparency, and promoting democratic values, their influence on policymaking remains limited. Although the National Convention on the EU (NCEU) provides a structured mechanism for dialogue, the extent to which its recommendations are integrated into policy remains insufficient. The 2024 Recommendation Book by the National Convention on the European Union (NKEU) highlights the stagnation in Serbia's progress toward the EU since 2021.

The book outlines 426 recommendations: 344 for the Serbian government, 42 for the EU, and 40 for civil society, with varying degrees of fulfilment.

The Serbian government has made limited progress, fulfilling only 8 out of the 344 recommendations completely; 4 recommendations to the EU remain unfulfilled or only partially fulfilled, while civil society struggles with issues of motivation and impact.

In October 2024, the Government of Serbia adopted the Reform Agenda, a strategic document developed in response to the European Union's Growth Plan for the Western Balkans, which offers EUR 6 billion to stimulate economic growth in the region. Serbia stands to receive approximately EUR 1.6 billion from this fund. The Reform Agenda outlines priority measures across four key areas: development of the business environment and private sector, green and digital transition, human capital, and foundational reforms. However, the process of defining these priorities has raised concerns due to the absence of a comprehensive Development Plan and very limited public dialogue, leading to questions about the criteria used for prioritisation of those key areas.

The highest political figures continued with defamation of civil society in 2024. President Aleksandar Vučić criticised international and domestic entities, including CSOs and the media, accusing them of undermining Serbia's position in international negotiations and attempting to destabilise the government⁷². He claimed that hundreds of millions of euros flow into Serbia to non-governmental organisations whose goal is to destroy him⁷³. This narrative was echoed by other high state officials, including Prime Minister Vucelic and President of the National Parliament, Ana Brnabić, to whom in August the National Convention on the EU sent an open letter. In this letter, it is stated, among other things, "We have witnessed an increasing number of activist arrests, as well as statements from high-ranking government officials accusing civil society organisations, including members of the National Convention, of being foreign agents, enemies of the state, and individuals whose goal is to destabilise the country and endanger the security of the President of the Republic, based on manipulations of Serbia's legal framework. This is despite the fact that these organisations have shared their knowledge and capacities with state institutions for years as part of the EU accession process."⁷⁴

In contrast to the views of CSOs, a majority of public administration representatives indicated that, in their opinion, public officials were sufficiently supportive or very supportive towards civil society. As an illustration of this support, most respondents from public institutions cited the financing of CSOs through public funds and the participation in meetings with CSO representatives as evidence of a positive attitude.

⁷² <https://n1info.rs/vesti/vucic-nacrtao-napade-na-njega-drzavu-optuzio-strane-sluzbe-medije-i-nvo/>

⁷³ <https://www.nin.rs/politika/vesti/55262/vucic-optuzio-nvo-da-su-dobile-desetine-i-stotine-miliona-evra-da-ga-ruse>

⁷⁴ <https://eukonvent.org/otvoreno-pismo-nkeu-predsednici-nrs-i-predsedniku-vlade-rs/>

SO 2.3. Public authorities contribute to civil society strengthening by cooperating with civil society through strategic policy frameworks and relevant institutional mechanisms.

Indicator 2.3.a: Proportion of CSOs that were effectively consulted in the preparation of civil society cooperation strategies.

In 2024 the Ministry of Human and Minority Rights and Societal Dialogue implemented the Strategy for Creating an Enabling Environment for the Development of Civil Society in the Republic of Serbia for the Period from 2021–2030 adopted in 2022. The consultation with civil society took place in 2021, and the process was described in the previous Assessment Report.

Indicator 2.3.b: IPA beneficiaries have adopted currently valid civil society cooperation strategies.

2024	5 – fully meets standards	Comprehensive national civil society cooperation strategy is in place
2023	5 – fully meets standards	Comprehensive national civil society cooperation strategy is in place
2021	1 – does not meet standards	No civil society cooperation strategy is in place.

In 2024 the Strategy for Creating an Enabling Environment for the Development of Civil Society in the Republic of Serbia for the period of 2022–2030, that was adopted on 3 February 2022, was in force.

Indicator 2.3.c: Civil society cooperation strategies are accompanied by adopted budgeted action plans.

2024	1 – does not meet standards	
2023	5 – fully meets standards	Action plan is adopted; budget is adopted
2021	1 – does not meet standards	

On 17 April 2024, the Ministry of Human and Minority Rights and Social Dialogue informed the interested public that the consultation process on the Proposal of Action Plan for the Implementation of the Strategy for Creating an Enabling Environment for the Development of Civil Society in the Republic of Serbia for the period 2024–2025 had begun. CSOs were involved in drafting the Action Plan, and the goals of the Action Plan included better CSO involvement in decision-making, improved financing transparency, and greater participation in socio-economic development and EU integration. The Action Plan incorporated feedback from CSOs, with collaborative drafting led by a Special Working Group that included members of civil society. Given that the Government was operating in a technical mandate for part of the year, the preparation process was delayed.⁷⁵ The Action Plan was only adopted in January 2025 for the period 2025–2026. Given that the previous Action Plan referred to 2022 and 2023, this indicator has been downgraded for 2024, given that in this year there was no accompanying Action Plan to the Strategy.

⁷⁵ Additionally, based on the Ministry of Human and Minority Rights and Social dialogue inputs provided to the Report, the preparation of the Action Plan took longer than expected owing to the need to coordinate with state administration bodies, particularly in aligning on realistic timelines for the implementation of activities for which they were designated as responsible.

Indicator 2.3.d: Proportion of CSOs that rate civil society cooperation strategies as relevant and effective.

Nine percent of CSOs in the survey found the national civil society strategy both relevant and effective. Twenty-one percent of CSOs in the survey found the national civil society strategy relevant, meaning that the strategy's objectives and design responded to civil society's needs, policies, and priorities, and would continue to do so even if circumstances change. A lesser percentage, 8%, found the strategy also to be effective, meaning that they expected it to achieve its objectives and its results.

Indicator 2.3.e: Public structures responsible for the implementation of civil society cooperation strategies are appropriately resourced.

The Department responsible for the civil society cooperation strategy in the Ministry of Human and Minority Rights and Societal Dialogue continues to operate with limited human, financial, and material resources, affecting its ability to implement its mandate fully.

While the Department was formally structured to include ten positions, only five employees were in place throughout the year. One of these employees was responsible for handling second-instance procedures related to business registry changes and appeals, a role not directly linked to the implementation of the strategy. In the views of employees in the department, obtained in two separate interviews, at least seven to eight employees would be required for the department to function at a more effective level.

Financial constraints were another major obstacle. The budget allocated for civil society project co-financing remains minimal, at only RSD 4,000,000 (approx. EUR 34,200) specifically intended to support projects that had already received EU funding. The Department relied heavily on external financial and technical assistance to carry out its responsibilities, with substantial support coming from international donors, including USAID and the Swiss Agency for Development and Cooperation-financed project 'For a Stronger Civil Society'. This external funding was crucial for key initiatives, such as drafting the 2025–2026 Action Plan, and supporting the work of the Council for Creating an Enabling Environment for Civil Society. However, with USAID ceasing its support, the sustainability of this assistance has remained uncertain. The Open Society Foundation has also contributed to the implementation of a public funds calendar, an important tool for tracking available funding opportunities.

Bureaucratic inefficiencies further hindered the Department's ability to operate effectively, according to employees in the sector.

The Department had adequate office space, equipment, and facilities to accommodate its current staff. However, a lack of in-house expertise meant that external consultants were required for essential tasks, particularly in areas such as designing transparent financing mechanisms for CSOs and drafting legal proposals relevant to the sector. The reliance on external expertise highlighted the Department's internal capacity gaps.

In a survey of public institutions, a minority of public servants stated that the state structure responsible for the implementation of national civil society cooperation strategy has adequate human and financial resources to implement the national civil society cooperation strategy effectively.

Indicator 2.3.f: Mechanisms for dialogue between civil society cooperation councils and central governments meaningfully include CSOs in that:

- they have an agreed programme of work;
- they have agreed rules of procedure;
- they meet regularly;
- rules allow CSOs to call the meetings and contribute to agenda setting;
- there is adequate follow-up to conclusions and recommendations.

2024	3 – moderately meets standards
2023	4 – meets most standards
2021	1 – does not meet standards

For the baseline assessment evaluating 2021, the Council for Creating an Enabling Environment for the Development of Civil Society was not formed. The Council was formed in September 2023, and the previous assessment indicator was graded against the process of its establishment, the inclusivity of its consultative process to determine its mandate, role and composition, as well as the transparent and democratic mechanisms for choosing representatives of civil society for this body, although only one session was held in 2023.

In 2024, the Council for Creating an Enabling Environment for the Development of Civil Society continued its activities, demonstrating a structured approach through the adoption of a work plan and regular meetings. However, despite these formal mechanisms, the Council's ability to meaningfully influence government policies remained limited, owing to structural inefficiencies and a lack of genuine government responsiveness. Information about the work of the Council was obtained through publicly available information as well as through a focus group with Council members, held on 6 February 2025, with four members and deputy members of the Council (all female) coming from CSOs.

The Council adopted its 2025 Work Plan in December 2024, outlining priorities such as monitoring the implementation of the Strategy for CSO Development (2022–2030), increasing transparency in public funding allocation for CSOs, analysing public policies affecting civil society, and engaging in legislative and policy processes. While the adoption of the plan indicated a commitment to structured dialogue, the practical impact of these efforts has been uncertain, as civil society representatives later decided to freeze their participation in early 2025, citing increasing hostility toward CSOs.

The Council also operated under a set of Rules of Procedure, which were amended in 2024 to allow the formation of expert subgroups on specific issues. However, several procedural gaps weakened its efficiency. One major issue was the lack of a clear process for replacing Council members when they left their organisations, leading to vacancies without a formal mechanism for re-election. Additionally, although the Council was intended to serve as an advisory body to the government, its members had not received training on how to effectively provide recommendations, which further diminished its impact. More significantly, the Council official recommendations could not be submitted directly to the government. This was evident in the case of the Council's official information document on media attacks against CSOs. While the document was prepared and approved by consensus, it had to pass through interministerial consultations where the Ministry of Finance and the Secretariat for Legislation ultimately decided which parts of the Council's proposals would be presented to Government. The fact that other ministries had the power to filter and revise the Council's proposals before they reached decision-makers underscored the Council's lack of autonomy.

Despite holding multiple sessions throughout the year—including extraordinary sessions in response to media attacks on CSOs—the Council struggled with delays and inefficiencies. Following the formation of a new government in May 2024, the Council's work was temporarily stalled as the mandates of government-appointed members automatically ended. It took time for new representatives to be

appointed⁷⁶, highlighting a recurring problem in the Council's functioning during political transitions. While discussions within the Council were open and inclusive, state representatives frequently avoided taking concrete positions on urgent issues. In particular, they often claimed they lacked jurisdiction when asked to address matters such as the detention of activists, thus limiting the Council's ability to secure meaningful government action.

A focus group discussion with Council members confirmed frustration with the body's lack of direct influence, its inability to respond swiftly to emerging threats, and the perception that it is ultimately ineffective in shaping government policy.

While the Council formally met several requirements of Indicator 2.3.f—such as having a work programme, rules of procedure, and regular meetings—its effectiveness was undermined by systemic barriers. The inability to submit recommendations directly to the government, the lack of substantial follow-up on CSO proposals, and the growing hostility toward civil society all contributed to a situation in which the Council functioned more as a symbolic body than as a genuine platform for civil society participation in policymaking. As a result, while the formal structures for dialogue between CSOs and the government remained in place, their practical impact was severely limited, making it clear that the requirements of Indicator 2.3.f were only partially met in 2024.

⁷⁶ <https://minijmpdd.gov.rs/ministar-zigmanov-sa-clanovima-saveta-iz-redova-civilnog-drustva/>



Specific Objective 3

CSO capacity and resilience to carry out their activities effectively are reinforced

SO 3.1. CSOs' internal governance structures follow the principles of good governance.

Indicator 3.1.a: Proportion of CSOs that have an independent and effective governing body, with clear terms of reference to oversee the organisation's strategic goals, impact, management, legal compliance, and accountability.

2024	3 – moderately meets standards	49%
2023	3 – moderately meets standards	53%
2021	3 – moderately meets standards	48%

The proportion of CSOs that in 2024 had an independent and effective governing body was 49%, which is similar to the baseline result from the 2021 survey (48%), and a decrease when compared to the 53% in the 2023 survey.

In the CSO survey for 2024, 90% of CSOs reported having a governing body, and 97% had a governing document. In the previous survey, 92% of CSOs reported having a governing body, and 99% on having a governing document. Similar percentages were recorded in the baseline survey, where 91% of CSOs reported having a governing body, and 99% had a governing document

As regards the independence of governing bodies, 42% of respondents reported that the executive director or another paid staff member of their organisation was a voting member of the governing body, which represents an increase when compared to the 39% of respondents in the 2023 survey, and a decrease compared to 2021, when this was the case for 45 % of the respondents.

Indicator 3.1.b: Proportion of CSOs that regularly check potential conflicts of interest with regard to the political, economic and personal relationships of their governing body.

2024	1 – does not meet standards	13%
2023	1 – does not meet standards	14%
2021	1 – does not meet standards	14%

The situation remains challenging regarding the potential conflict of interest of members of the governing body. Only 13% of CSOs (similar to the previous and baseline surveys, in which the portion was 14%) required that the conflict-of-interest declaration be signed every year, whilst 6% (compared to 2% in 2023, and 5% in 2021) required that a declaration be signed every second year.

Some 50% of respondents required a conflict-of-interest declaration to be signed only once, upon members of the governing body entering into their role, compared to 40% in 2023 and 33% in 2021. Twenty percent of CSOs never require the conflict-of-interest declaration to be signed by the members of the governing body, which is a significant decrease from 32% of CSOs in 2023 and 36 % in 2021. Other answers, adding up to a total of 11%, indicated reasons similar to those in the previous surveys:

that the declaration was signed when the CSO deemed it necessary, such as in processes of public procurement, when requested by the donor funding the project, or when specific issues arise during implementation of certain activities.

Indicator 3.1.c: Proportion of CSOs that share relevant information on their organisation, using the means and channels that are accessible to all stakeholders in terms of publishing.

2024	1 – does not meet standards	13%
2023	1 – does not meet standards	10%
2021	1 – does not meet standards	17%

There has been minimal variation over time when it comes to CSOs that publish their governing documents in conjunction with either their organisational structure, membership details, or both. According to the survey, only 13% of CSOs had those documents published on their website in 2024 – more than the 10 % in 2023, but less than the 17% of CSOs in 2021.

According to the survey, in 2024, 31% of CSOs had their governing document, statute, articles of association, or similar founding document published on the organisation's website. The structure of the organisation's board was published by 29 % of CSOs, and the names of the members of the board were published on the organisation's website by 34% of CSOs. Forty-two percent of CSOs did not have any information on their governing document, governance structure or names of the members of the board, published on their website.

Indicator 3.1.d: Proportion of CSOs that have an organisational gender equality policy.

2024	3 – moderately meets standards	58%
2023	2 – minimally meets standards	38%
2021	3 – moderately meets standards	51%

There has been a fluctuation in survey results over the years regarding the percentage of CSOs that have an organisational gender equality policy. In the most recent 2024 survey, 58% of CSOs reported having such a policy. In the baseline survey, 51% of respondents indicated they had a gender equality policy. In the survey conducted in 2023, only 38% of CSOs stated they had such a policy in place.

Indicator 3.1.e: Proportion of CSOs that have an organisational strategy, including vision, mission, and goals.

2024	4 – meets most standards	68%
2023	3 – moderately meets standards	59%
2021	4 – meets most standards	70%

In the survey, 68% of CSOs indicated that their organisation had an organisational strategy, strategic plan, or similar document for 2024. This percentage is closer to the baseline study results from 2021, where 70% of CSOs had such a document, compared to the previous survey in 2023, where only 59% confirmed having such a document.

SO 3.2. CSOs are able to communicate the results of their activities to the public.

Indicator 3.2.a: Proportion of CSOs that have at least one on-line channel of communication.

2024	5 – fully meets standards	94%
2023	5 – fully meets standards	95%
2021	5 – fully meets standards	99%

The use of online communication channels remained high, with 94% of respondents in the 2024 survey using at least one online channel regularly. However, in the 2021 survey, 99% reported regular use, compared with 95% in 2023.

Between 2023 and 2024, the use of social media in general increased. Facebook continued to be the most used platform by CSOs, with 83% using it in 2024, up from 80% in 2023. Instagram's usage rose from 52% in 2023 to 64% in 2024. Network X (formerly Twitter) was used by 22% of CSOs in 2024, compared to 19% in 2023. LinkedIn usage increased from 20% in 2023 to 29% in 2024, and TikTok was used by 8% of CSOs in 2024, up from 6% in 2023. YouTube was used as a communication channel by 34% of CSOs in 2024, up from 27% in 2023.

The usage of their own websites remained similar, with 54% in 2024 compared to 53% in 2023. Messaging apps such as Viber, Telegram, WhatsApp, and Signal were used by 26% of CSOs in 2024, compared to 24% in 2023.

Indicator 3.2.b: Proportion of CSOs that have specialised communication staff.

This indicator was not assessed.

Indicator 3.2.c: Proportion of CSOs that cooperate with the media.

In 2024, there was a further decline to 30% in the number of CSOs that cooperated with the media. According to the survey, in 2023, 32% of CSOs had collaborated with the media, compared to 47% in 2021.

SO 3.3. CSOs are transparent about their programme activities and sources of funding.

Indicator 3.3.a: Proportion of CSOs that publish their annual reports and financial statements.

2024	2 – minimally meets standards	25%
2023	1 – Does not meet standards	16% ⁷⁷
2021	2 – minimally meets standards	31% ⁷⁸

Both an annual report and a financial statement were published on either their website or in hardcopy by 25% of CSOs in 2024, compared to 16% in 2023 and 31 % in 2021⁷⁹. The official government register—the website of the Serbian Business Registers Agency—remains the primary channel for publishing these documents: 84% published it on the SBRA site. It is important to note that submitting a financial statement to the Serbian Business Registers Agency is a legal obligation for CSOs.

The reasons provided by CSOs for not publishing their annual reports and financial statements in 2024 included the recent establishment of the organisation, not having a website, not having a budget, being an informal group, periods of inactivity during the reporting year, and reliance on official records for providing financial information.

Indicator 3.3.b Proportion of CSOs that publish information on their sources of funding and amounts received in the previous year.

2024	2 – minimally meets standards	27%
2023	1 – does not meet standards	19%
2021	2 – minimally meets standards	23%

In 2024, information on both sources of funding and the amounts received in the previous year was published by 27% of CSOs, which was an increase compared to 2023, when only 19% of CSOs published the information. In 2021, the figure was 23%.

In 2024, 32 % of CSOs did not publish information on their sources of funding and the amounts they received, compared with 37% in 2023. Interestingly, the sources of funding were published by 55%, less than in 2023, when 60% of CSOs published this information; whilst the amounts received were published by 33% of CSOs, which was an increase compared to 23% in 2023.

⁷⁷ The 2023 value for Indicator 3.3.a was 37%. Following the recalculation of the indicator to ensure the accuracy of the value, the revised value for 2023 was 21%.

⁷⁸ The 2021 value for Indicator 3.3.a was 48%. Following the recalculation of the indicator to ensure the accuracy of the value, the revised value for 2021 was 31%.

⁷⁹ Value for Indicator 3.3.a was originally published as 45% in 2021 and 24% in 2023. Following the recalculation of the value to rectify an error, the revised value for 2021 is 31% and for 2023 is 16%.

Indicator 3.3.c: Degree of public trust in CSOs

According to the Regional Cooperation Council's (RCC) Balkan Barometer – the annual survey of regional perceptions and attitudes across a wide array of social, economic and environmental factors – public trust remains stable.⁸⁰

Degree of public trust in CSOs	
2024	41%
2023	40%

According to the Balkan Public Barometer for 2024,⁸¹ 45% of the public trust civil society. Another half of the respondents (55%) declared that they did not have trust in civil society.

These results show a decrease of public trust in Kosovo compared to 2023, when the degree of public trust in CSOs was rated at 50%.⁸²

SO 3.4. CSOs monitor and evaluate the results and impact of their work.

Indicator 3.4.a: Proportion of CSOs that have carried out an evaluation of their work in the last year.

2024	4 – meets most standards	79%
2023	4 – meets most standards	75%
2021	5 – fully meets standards	87%

In 2024, 79% of respondents conducted at least one evaluation, compared to 75% in 2023 and 87% in 2021. A majority of CSOs, 74%, reported that their organisation carried out a project evaluation in 2024, compared to 67% in 2023. Evaluation of strategy was conducted by 19% of CSOs (15% in 2023), while internal processes were evaluated by 23% of CSOs, the same as in 2023. However, 15% of respondents did not carry out any type of evaluation in 2024.

SO 3.5. CSOs use research and evidence to underpin their work.

Indicator 3.5.a: Proportion of CSOs whose work is based on evidence generated through research.

2024	4 – meets most standards	80%
2023	4 – meets most standards	79%
2021	5 – fully meets standards	86%

In the CSO survey, 80% of CSOs reported using some form of evidence-based research to inform their work in 2024 (in line with 79% in 2023, and comparable with the 86% in the baseline assessment of 2021). Among the methods used, 47% employed surveys with specific groups, 42% used focus group meetings,

⁸⁰ <https://www.rcc.int/balkanbarometer/results/2/public>

⁸¹ Balkan Public Barometer 2024 Index, available at: <https://www.rcc.int/balkanbarometer/results/2/public>

⁸² Balkan Public Barometer 2023 Index, available at: <https://www.rcc.int/balkanbarometer/results/2/public>

29% engaged in field research, and 26% performed desk research, showing percentages similar to those in 2023.

Less commonly used methods included public opinion surveys, which were used by 13% of respondents.

The CSOs that did not conduct any research cited reasons such as their being just newly established, lack of time, resources, or capacity, having no need for this type of research, or planning to undertake it in the future.

Indicator 3.5.b: Proportion of CSOs whose work is informed through consultation with people who have a stake in their current or future work.

2024	5 – fully meets standards	91%
2023	5 – fully meets standards	93%
2021	5 – fully meets standards	91%

The percentage of CSOs that reported consulting stakeholders on their work in the 2024 survey was 91%, which was the same as in the baseline survey, while in 2023 the percentage was 93%.

In 2024, 64% of CSOs consulted with their members, and 60% engaged with local communities. Local authorities were consulted by 34% of CSOs, followed by public institutions at 28%, and academic institutions at 27%. Private businesses were consulted by 21%, and national authorities by 28% of respondents. Additionally, 10% of CSOs consulted with other stakeholders, including trade unions, other CSOs and others.

SO 3.6. CSOs work in fair and respectful partnerships to achieve shared goals.

Indicator 3.6.a: Proportion of CSOs taking part in local, central and international CSO networks.

In the CSO survey, 83% of respondents indicated that their organisation participated in either local, national, or international networks. By way of comparison, this percentage was 75% in the 2023 survey, and 77% in 2021. In 2023, 67% of CSOs were members of civil society networks at the national level (compared to 56% in 2023), 41% were members of international networks (42% in 2023), and 21% participated in local networks (18% in 2023).

Indicator 3.6.b: Proportion of CSOs engaged in cross-sectoral partnerships with academia, social partners and private sector.

The CSO survey revealed that in 2024, 49% of CSOs were involved in cross-sectoral partnerships with academia, social partners (trade unions and employer organisations), and with the private sector. Conversely, 23% of respondents did not engage with any partners in 2024.

SO 3.7. CSO have a diversified funding base.

Indicator 3.7.a: Proportion of CSOs whose sources of donor income are diversified.

2024	3 – moderately meets standards	59%
2023	4 – meets most standards	69%
2021	3 – moderately meets standards	58%

CSOs that participated in the survey were asked whether they received funding from specific donors and the percentage of their budget attributable to each donor. The analysis indicates that 59% had a diversified donor income, meaning no single donor contributed more than 50% to their funding. This figure was very similar to the 2021 baseline study, where 58% of CSOs reported diversified income, but lower than the results from the 2023 survey, which recorded a percentage of 69%⁸³. In 2024, 8% of CSOs did not have any donors, compared to 11% in the baseline study.

The European Commission became an even more significant donor, emerging as the most dominant donor with 61% of CSOs using their funds in 2024, compared to 45% in 2023, and 38% in 2021. In 2024, 59% received funding from foreign private foundations and international CSOs, which had collectively amounted to a source of funding for 55% 2023 – 48% of CSOs in 2021.

Public funds (funding from national and provincial government, and local self-government) served as a source for 56% of CSOs, compared to 52% in 2023 and 58% in 2021. Additionally, 44% of CSOs reported receiving funding from bilateral donors, compared to 32% in 2021 and 46% in 2023.

International organisations (the United Nations, Organisation for Security and Co-operation in Europe, and Council of Europe) provided funding for 26% of CSOs in 2024, compared to 20% in 2023 and 25% in 2021.

CSOs that reported not having donor funding tended to be small organisations, relying primarily on volunteers (75% of those CSOs doesn't have any paid staff) and other sources of funding such as membership fees and individual donations.

Indicator 3.7.b: Proportion of CSOs raising funds from sources other than donors e.g. membership fees, corporate/individual giving and income generating activities.

2024	4 – meets most standards	74%
2023	4 – meets most standards	69%
2021	4 – meets most standards	73%

Seventy-four percent of CSOs that participated in the survey reported raising funds from at least one source other than donors in 2024, compared with 69% in 2023⁸⁴ and 73% in 2021. Although the overall percentage remains similar to the baseline study, we see decrease or stagnation in the raising of funds from each source except private business.

In 2024, 33% of CSOs indicated that they raised funds from individual donations, which marks a decrease from 43% in 2021. Income-generating activities—including a CSO's own business, social enterprise activity, or service provision—accounted for funding sources in 28% of CSOs, similar to 30% in 2021.

⁸³ Value for Indicator 3.7.a was originally published as 66% in 2023. Following the recalculation of the value to rectify an error, the revised value for 2023 is 69%.

⁸⁴ Value for Indicator 3.7.b was originally published as 78% in 2023. Following the recalculation of the value to rectify an error, the revised value for 2023 is 69%.

Membership fees constituted a funding source for 23% of CSOs, compared to 29% in 2021. Contributions from private businesses were received by 26% of the CSOs, up from 24% in 2021 and 2023. Crowdfunding was utilised by 12% of respondents, maintaining the same percentage as in 2023, which was an increase from the 8% reported in the 2021 survey.

However, although a large percentage of CSOs report raising funds from at least one source other than donors, for the vast majority of them, each of these sources contributes no more than 25% of their annual budget.

SO 3.8. CSOs have effective, empowered and developed human resources

SO 3.8. CSOs have effective, empowered and developed human resources.

Indicator 3.8.a: Proportion of CSOs that employ staff.

The percentage of CSOs that employed staff has remained consistent over time. In 2024, it was 70%, in 2023 it was 69%, and in 2021 it was 71%. In 2024, 29% of CSOs operated without paid staff, 48% employed 1–5 individuals, 14% employed 6–10 individuals, and 20% employed 11 or more individuals.

Indicator 3.8.b: Proportion of CSOs that have organisational human resources policies.

2024	1 – does not meet standards	1%
2023	1 – does not meet standards	0%
2021	1 – does not meet standards	0%

The indicator assessed whether the organisations had followed the organisational policies in place: the Diversity, Equality, and Inclusion policy, Safeguarding of Children and Vulnerable Adults policy, Bullying and Harassment policy, Recruitment policy, Performance Evaluation policy, Grievance/Complaints policy, Remuneration policy, Disciplinary policy and Redundancy policy. In 2024, for the first time, 1% of CSOs had all nine organisational human resources policies in place, compared to 2021 and 2023, when none had all of them. In 2024, 29% of CSOs reported having no policies, compared to 19% in 2021, and 32% in 2023.

Among the policies surveyed, 45% of CSOs had a Diversity, Equality, and Inclusion policy, 42% had a Safeguarding of Children and Vulnerable Adults policy, and 29% had a Bullying and Harassment policy. Additionally, 21% had a Recruitment policy, 20% had a Performance Evaluation policy, 18% had a Grievance/Complaints policy, 10% had a Remuneration policy, and 17% had a Disciplinary policy; but only 4% had a Redundancy policy.

Indicator 3.8.c: Proportion of CSOs that have advertised publicly their staff and volunteering vacancies in the last year.

This indicator was not assessed.

Indicator 3.8.d: Proportion of CSOs that have organisational policies encouraging recruitment of a diverse workforce.

In 2024, 14% of CSOs reported having both a Recruitment policy and a Diversity, Equality, and Inclusion policy in place, to help promote a diverse workforce, similarly to 10% in 2023 and 13% in 2021.

Indicator 3.8.e: Proportion of CSOs whose staff and volunteers have attended a training course in the past year.

2024	5 – fully meets standards	83%
2023	4 – meets most standards	76%
2021	5 – fully meets standards	83%

In 2024, 83% of CSOs reported that their organisation provided opportunities for staff or volunteers to attend a training course for professional development. This percentage matches the results from 2021, and shows an increase from 76% in 2023.

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