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EMPLOYEE RIGHTS (LEGAL FRAMEWORK), SAFETY AT WORK AND IMPLEMENTATION MECHANISMS

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Foreword

The Kosovo Foundation for Open Society has supported Kosovo's European integration process since 2006, when it founded the European Integration and Good Governance program. Since then, the Foundation has constantly supported the non-governmental organizations' engagement in the process with their analysis, monitoring of policy developments, public discussions, and advocacy processes. The support has resulted in numerous analyses through the years and acquisition of essential knowledge and expertise over the processes by Kosovo's civil society organizations. Hence, in joint effort with a number of organizations already active in certain segments of integration process, the Foundation initiated the project "Civil Society for the Progress Report 2014" through which it offered the organizations an opportunity to channel their contribution to the upcoming Progress Report and the current Stabilization and Association Process Dialogue through focused and well-informed analysis, built on their multi-year experience and engagement.

Each analysis produced within the project addresses a specific segment of the current dialogue between Kosovo and the European Union, informing about the current situation, from the civil society's point of view, followed by the recommendations on the needed improved performance.

We hope that this exercise has produced will be of value not only to Kosovo's civil society organizations for further amplification of their voice within the integration process, but also to the European Union and the Government of Republic of Kosovo towards building of a standing cooperation with this segment of the state-building process. Ultimately, we hope that as a result of all the stakeholders' engagement, Kosovo's European integration process will accelerate, overcoming all the political barriers that stand on our way to this destination.

Iliriana Kacaniku
European Integration and
Good Governance Program

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Introduction

Employee rights in Kosovo, their respect and protection are some of the important issues, but they have been poorly addressed by Kosovo institutions. While some progress is made in the field of drafting legislation that protects employee rights, still in many cases, this legal framework is either incomplete or mechanisms and capacities for its implementation are lacking.

The Labour Law passed by the Kosovo Assembly on 02.11.2010 laid the foundation of a legal framework that would regulate the field of employee rights. But delays in developing by-laws have significantly made it difficult to implement the law. Further, the lack of capacities of the Labour Inspectorate and other responsible institutions for protection of employee rights and insufficient engagement of civil society organizations, in particular trade unions, created the situation in which guaranteed employee rights are constantly violated.

Employees in the private sector are in a more difficult situation, whose situation is more serious compared to those of public sector since a large part of employees in the sector are part of the informal economy, known as black economy¹, and as a result, they are discriminated from the right to contribute to their pension fund by their employers.

Further, employees in the private sector to a large extent work without a job contract; working hours are not respected; they work up to 12 hours a day²; the majority of them are denied from the right to enjoy weekly or annual leave; they are not compensated for their overtime work³; there is significant lack of workplace safety and lack of protective equipment, and as a result this directly affects safety and health of employees; and they are not reimbursed for the medical costs incurred at the workplace⁴.*

1 Hoti, Afrim: Respektimi dhe Mbrojtja e të drejtave të punëtorve në Kosovë, Prishtinë 2010, pp.13-14.

2 Interview with Mrs.Shukrije Rexhepi, legal officer of the Union of Independent Trade Unions of Kosova(BSPK) 29.04.2014

3 Hoti, Afrim: Respektimi dhe Mbrojtja e të drejtave të punëtorve në Kosovë, Prishtinë 2010, pp.13-14

4 Center for Policies and Advocacy: Monitoring of Implementation of Labour Law, Prishtinë 2012.

*According to this report, half of those employed in the private sector do not possess a formal contract, while only 20% of the employed were compensated for injuries inflicted in their job place.

The following analysis emphasizes the current situation with regard to the adopted legislation and its practical implementation in the field of employee rights, operation of some of the key institutions that deal with employee rights, and current challenges as well as some ways to address them.

Basic legal framework on labour rights

Primary Legislation from UNMIK Regulation to Labour Law

Labour legislation has relatively a short history in Kosovo. Regulation No. 2001/27 on Basic Labour Law in Kosovo was the first legal document that regulated employer-employee relations. The regulation that was drafted by UNMIK administration laid the first framework for regulating labour in Kosovo, including labour relations according to which work is completed or services provided. Labour relations as part of public service, UNMIK, KFOR and foreign offices or international governmental organizations are not covered by the regulation⁵. The regulation has been applicable from 2001 to 2011, when the Kosovo Assembly approved the new law known as Labour Law.

Contrary to UNMIK Regulation No. 2001/27, which was approved without any public consultation, the Labour Law has been a topic of discussions and negotiations, mainly among employer associations and trade unions, organized by the respective assembly commission and numerous civil society organizations⁶. Consultations lasted for almost a year, before the law was passed by the Kosovo Assembly.

The Law aims to regulate rights and responsibilities in labour relations. The provisions of the law are implemented for both public and private employees and employers in the Republic of Kosovo⁷.

The Law is divided into twelve (12) chapters and contains 100 articles:

- I. Basic provisions,
- II. Establishing labour relation,
- III. Systematization of the employee at the workplace,
- IV. Working hours,
- V. Leave and absence from work,
- VI. Protection and safety at work,
- VII. Wage and benefits of the employee,
- VIII. Termination of labour relation,

5 Regulation No. 2001/27 on Basic Labour Law in Kosovo; article 1.1 and 1.2.

6 http://www.institutigap.org/documents/33549_GAPLigjiPunes.pdf, p.3.

7 Labour Law No. 03/L-212; article 2.1, 2.2 and 2.3.

- IX. Procedures for realizing rights from labour relations,
- X. Employee and employer organizations,
- XI. Punishing provisions, and
- XII. Provisional and final provisions.

The role of trade unions and civil society organizations in developing the draft labour bill was very important, and thanks to their contribution, a series of key issues were included in the final version of the bill, which was later passed at the Assembly. Thanks to the recommendations that were derived from the trade unions and civil society, some of the articles of the bill were amended and supplemented, including: work contract is only in written form; trial job period lasts only for 6 months at most; working hours are at 40 hours per week; employees are entitled to a 30 minute break; there is a 4 week annual leave, while women are guaranteed a 12 month maternity leave, 9 of which are paid⁸.

The Labour Law in general is assessed to have created a solid basis in regulating employer-employee relations.

The Law also included provisions of the International Labour Organization (ILO) Conventions, which serve as standard basis for individual states to regulate the field.

The Law content / Conventions	Kosovo	ILO Convention
Contract	Written	According to international laws / collective agreements
Working hours	8 hours per day, and 40 hours per week	8 hours per day and not more than 48 hours a week ⁹
Working days per week	Unspecified	Unspecified
Weekly break	At least 24 hours	At least 24 hours

8 http://www.institutigap.org/documents/33549_GAPLigjiPunes.pdf, p.2

9 Hours of Work (Commerce and Offices) Convention, 1930 (No. 30), article 3

Maternity leave	12 months (9 months paid and 3 months unpaid)	Not less than 14 weeks ¹⁰
Annual leave	4 weeks	Not less than three weeks for a year of work ¹¹
Compensation of medical leave as a result of injury or professional condition at work	70% of the wage	60%

Besides the Labour Law, which is the basis for regulating employer-employee relations, there is a series of other laws that directly or indirectly regulate the rights and responsibilities of employers and employees. This legal framework includes the following:

- 1) Law No. 04/L-119 on amending and supplementing the Law No. 03/L-200 on Strikes¹² passed on 6 September 2012. This law aims to recognize and guarantee the rights of employees to organize and attend strikes, based on applicable laws and international standards.
- 2) Law No. 04/-L-011 on trade union organizations in Kosovo¹³, passed on 28.07.2011 by the Kosovo Assembly. This Law aims to regulate and define rights and freedoms of the employees to freely and voluntarily establish and organize trade union organizations in the public and private sector, in order to represent and protect economic, social and professional rights of the employees at work and in labour relations.
- 3) Law No. 04/L-161 on safety and health at work¹⁴ passed on 16.05.2013 – The purpose of this law is to define measures for improving safety and health levels of the employees at work.

10 Maternity Protection Convention, 2000 (No. 183), article 4

11 Holidays with Pay Convention (Revised), 1970 (No. 132), article 3.3

12 <http://gzk.rks-gov.net/SearchIn.aspx?Index=2&s=ligji%20per%20grevat&so=1>

13 <http://gzk.rks-gov.net/SearchIn.aspx?Index=2&s=ligji%20per%20organizimin%20sindikal&so=1>

14 <http://www.kuvendikosoves.org/common/docs/ligjet/Ligji%20per%20sigurine%20dhe%20shendetin%20ne%20pune.pdf>

- 4) Law No. 2003/19 on Safety at Work, Protection of Health and Environment at Work¹⁵ was passed on 09.10.2003 – The purpose of the Law on Safety at Work and Protection of Employee Health and Environment at Work is to prevent injuries at work, professional illnesses at workplace and to protect working environment.
- 5) Law No. 03/L-136 on issuing a working permit and hiring foreign nationals in the Republic of Kosovo¹⁶ was passed on 10 July 2009 – This law regulates the manner, conditions and procedures for issuing a working permit and hiring foreign nationals in the Republic of Kosovo based on the defined criteria by law, international conventions and inter-state agreements.
- 6) Law No. 03/L-017 on Labour Inspectorate¹⁷ was passed on 29 April 2008. The law established the Labour Inspectorate as an executive body of the Ministry of Labour and Social Welfare. The Labour Inspectorate supervises implementation of legal provisions and by-laws in the field of labour generally, including labour relations, safety at work, protection of health of the employees and working environment.
- 7) Law No. 04/L-008 on Social-Economic Council¹⁸ was passed on 21 July 2011. The Law establishes the Social Economic Council (SEC) in order to establish and develop social dialogue in the Republic of Kosovo for employees and employers, on issues of special relevance pertaining to realization of their economic, social and professional rights that are enacted by resolving disputes through bilateral and trilateral agreements.
- 8) Law No. 03/L-019 on Training, Re-training and Employment of Persons with Disabilities¹⁹ was passed on 18 December 2008. The purpose of the Law is legal and institutional support for training, retraining, and professional development for appropriate employment of persons with disabilities based on the principle of equal opportunities, including gender opportunities.

15 http://www.gazetazyrtare.com/e-gov/index.php?option=com_content&task=view&id=83&Itemid=28

16 <http://gzk.rks-gov.net/ActDetail.aspx?ActID=2645>

17 <http://gzk.rks-gov.net/SearchIn.aspx?Index=2&s=Ligji%20Nr.%2003/L-017%20per%20Inspektoratin%20e%20Punes&so=1>

18 <http://gzk.rks-gov.net/SearchIn.aspx?Index=2&s=Ligji%20Nr.%2004/L-008%20p%C3%ABr%20K%C3%ABshillin%20Ekonomiko-Social&so=1>

19 http://www.kuvendikosoves.org/common/docs/ligjet/2008_03-L-019_al.pdf

Secondary legislation

In order to better implement the laws passed by the Assembly of the Republic of Kosovo, line ministries adopted administrative instructions and other necessary legislation, including the following:

- i. Administrative Instruction (AI) no. 01/2011, on setting and issuing fines for non-implementation of provisions of the Labour Law,
- ii. AI no. 02/2011, Labour Cards,
- iii. AI no. 05/2011, on regulating and defining administrative procedures of the financial payment for maternity leave,
- iv. AI no. 10/2011, on classification and systematization of hazardous jobs that harm employee health,
- v. AI no. 11/2011, on systematization of laborious and hazardous jobs that harm pregnant and breast-feeding women,
- vi. AI no. 12/2011, on registration of collective agreements,
- vii. AI no. 13/2011, on defining jobs with harmful effects on employees, as a prerequisite for duration of the annual leave,
- viii. AI no. 14/2011, on regulating procedures for establishment of labour relations in the public sector,
- ix. AI no. 15/20011, on amending and supplementing the AI no. 05/2011, on regulating and defining administrative procedures of financial payment for maternity leave,
- x. AI no. 01/2012, on systematization of easy and banned jobs for persons under 18 years old.

While adoption of legislation that regulates employee rights is extremely important, the practice in Kosovo has shown that without competent mechanisms for law monitoring and enforcement, these rights only remain on paper. Key issues regulated with the applicable legal framework continue to remain a great challenge for respective institutions, especially for employees, whose rights continue to be violated, including the very life of employees.

Safety and health at work

Safety at work is a key issue and undoubtedly the most important not only for employees but for employers as well. Safety and health issues at work are regulated by the Law no. 04/L-161 on Safety and Health at Work²⁰, which was passed by the Assembly of the Republic of Kosovo in May 2013.

The purpose of this law is to define measures for improving safety levels and health of the employees at workplace. The law contains general principles for preventing professional risks, elimination of risk factors and accidents, information, consultation, balanced participation in improvement of safety and health levels at work, training of employees, their representatives and general instructions for implementation of these principles²¹.

Provisions of the law are implemented in public, private, public-private and state administration sectors at local and central levels. Provisions of the law apply to the following: interns, pupils and students in internships during schooling, sentenced persons hired for work, visitors, business associates, service users and persons in professional training or retraining at the employer. Provisions of the law do not apply in sectors, whose activity is regulated with special laws, such as: Kosovo Security Forces, police, fire department service and services for protection and rescue²².

The Law on Safety and Health at Work establishes the National Council for Safety and Health at Work. The Council proposes, recommends and drafts policies for improving safety and health levels at workplace and constantly follows safety and health situation of employees at workplace²³. The Council consists of eleven (11) members: three (3) Government representatives, two (2) employer representatives, two (2) employee representatives, two (2) experts from the field of safety and health at work, one (1) expert of labour medicine, and one (1) ad hoc expert, depending on the nature of the issue²⁴.

20 <http://www.kuvendikosoves.org/?cid=1,191,1027>

21 Law on Safety and Health at Work, articles 1.1 and 1.2.

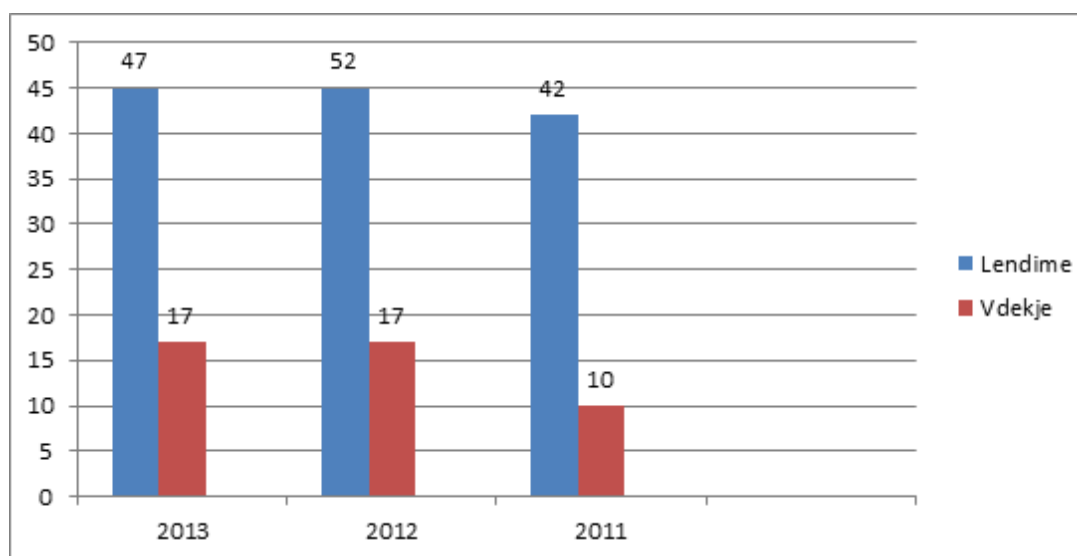
22 Law on Safety and Health at Work, articles 2.1, 2.2 and 2.3

23 Ibid, article 4.1

24 Ibid, article 4.2

The Council is still not operational and it is in the consultative phase. It is expected to become operational in June 2014, while working regulation of the Council is at the final phase of development²⁵.

Despite relatively good legal framework, safety of employees at the workplace in Kosovo still remains concerning. Every year, as a result of inadequate and unsafe working conditions at workplace, many injuries and casualties were recorded in Kosovo. Last year alone (2013), 47 serious injuries, and 17 death cases of employees at the workplace were recorded²⁶. In 2012, the situation was about the same, with 52 accidents with injuries, and 17 deaths²⁷, while in 2011 there were 42 accidents with injuries and 10 death cases at workplace²⁸.



Even though the Labour Inspectorate had organized training for health and safety inspectors²⁹, the trend shows that there was no improvement of safety situation at the workplace, on the contrary, the situation got worse.

25 Interview with the chief inspector of the Labour Inspectorate Mr. Basri Ibrahim, 13.05.2013.

26 Ibid.

27 <https://mpms.rks-gov.net/Portals/0/Librat/Objektivat,%20aktivitetet%20dhe%20t%C3%AB%20arriturat%20e%20Inspektoratit%20t%C3%AB%20Pun%C3%ABs%20gjat%C3%AB%20vitit%202012.pdf>

28 <https://mpms.rks-gov.net/Portals/0/Librat/Raporti%20vjetor%202011%20i%20TEIP.pdf>

29 http://www.europarl.europa.eu/meetdocs/2009_2014/documents/dsee/dv/6/6en.pdf

Labour Inspectorate Executive Body (LIEB)

Labour Inspectorate Executive Body competencies

The Labour Inspectorate Executive Body was established based on the Law No. 2002/9 on Labour Inspectorate in Kosovo, adopted in 2002, and amended in 2008. This body operates under the authority of the Ministry of Labour and Social Welfare (MLSW) and it is run by the Chief Labour Inspector, who is required to report to the MLSW for his work at the body. The Labour Inspectorate Executive Body currently comprises of 3 deputy chief inspectors and 50 inspectors in addition to the chief inspector³⁰. All 50 labour inspectors operate in 37 municipalities in Kosovo and they are required to inspect at least once every employer, or even more often upon request of a party. They are also required to supervise implementation of the labour law, including safety at work, protection of health and assessment of working conditions, as well as supervision of other by-laws pertaining to the labour relations in the public and private sectors³¹.

Labour inspectors have authorizations to enter without a notice and uninterrupted at any workplace to conduct their examinations, inspections and research to ensure that law provisions are being implemented. However, during the inspection, the inspectors have to inform the employer for his presence, and at the end to submit to the employer the official report on the conducted inspection, irrespective of whether the inspector found violations of law or not³².

Functions and obligations of the Inspectorate defined with the national legislation also rely on the International Labour Organization (ILO) Standards, its Convention No. 81 and its protocol, from 1995, article 3.1.a. which defines that functions of the labour inspection system must “ensure implementation of the legal provisions related to work conditions and protection of employees at the workplace, provisions that deal with hours, remuneration, insurance, health and welfare of children and young persons and other issues, to the extent that such provisions are implemented by labour inspectors”. This requires full support by central authorities, primarily by creating adequate labour conditions and optimal logistic support³³.

30 Interview with chief inspector Mr. Basri Ibrahim

31 http://www.institutigap.org/documents/33549_GAPLigjiPunes.pdf, p.8

32 Ibid, p. 9

33 Hoti, Afrim : Respektimi dhe Mbrojtja e të Drejtave të Punëtorëve në Kosovë, Prishtinë 2012, p.9.

Labour Inspectorate Executive Body Work Performance

The limited number of inspectors poses a serious problem for fulfilling their performance as guardians of employee rights. Another obstacle is the lack of equipment (vehicles) that are necessary for performing the tasks, since inspectors' work takes place in the field ³⁴.

Limited capacities of the Labour Inspectorate were also noted in the progress report of last year (2013)³⁵ as well as in the conclusions of the first meeting of the dialogue on Stabilization-Association Agreement ³⁶.

Lack of inspectorate capacities is directly reflected in inspectors' performance. In 2013, 8378 cases were inspected; upon request of the party, 357 inspections were conducted, as well as 120 joint inspections with other institutions. It issued 125 punitive measures³⁷. Meanwhile, there were 82995 active businesses registered with the Agency for Business Registration in 2013. On the other hand, there are about 50000 businesses that pay taxes to Kosovo Tax Administration(KTA). Based on this calculation, the Labour Inspectorate managed to inspect only 10.1% of businesses in Kosovo, without calculating here employers in the public sector, which means that in the best case scenario (compared to KTA data) about 17% of total businesses were inspected.

The same situation prevailed in previous years as well. In 2012, the Labour Inspectorate conducted 7074 inspections, from which 4694 were regular inspections (inspections planned by inspectors), 1886 were repeated inspections (inspections to verify elimination of weaknesses found during regular inspections of employers), 332 were inspection upon request of the parties for completion of the labour relation rights, and 162 were joint inspections with other monitoring institutions. A written remark was written to 1886 businesses, a fine was written to 157 businesses, which upon reception of the written remark did not act to eliminate weaknesses identified by labour inspectors, while due to non-respect for legal provisions, 83 cases were sent to

34 Ibid

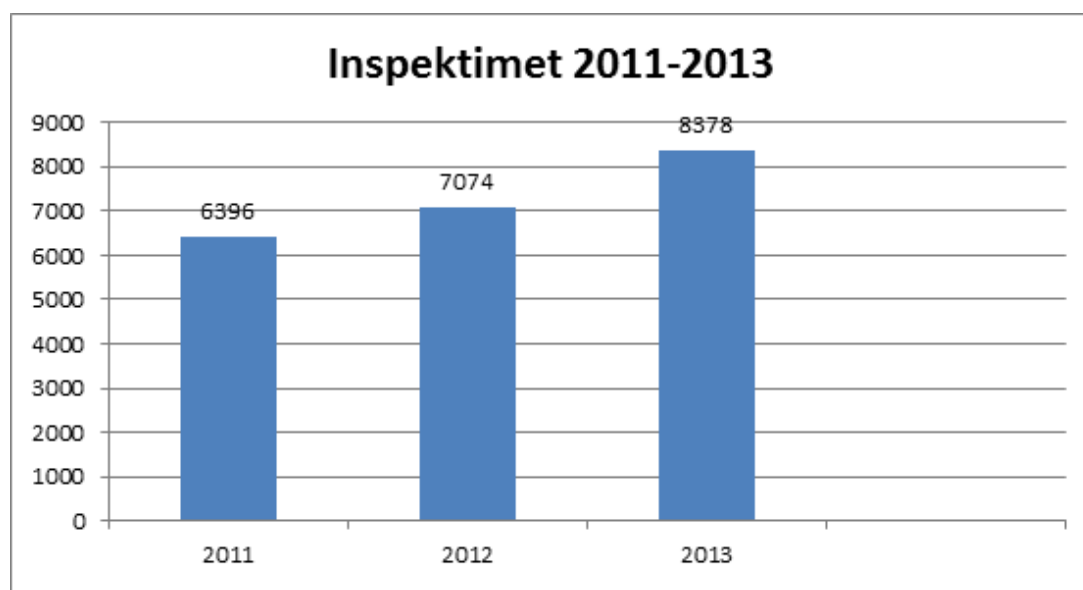
35 http://www.europarl.europa.eu/meetdocs/2009_2014/documents/dsee/dv/6/6en.pdf

36 http://www.europarl.europa.eu/meetdocs/2009_2014/documents/dsee/dv/6/6en.pdf

37 Interview with chief inspector Mr. Basri Ibrahim

the second degree³⁸.

In 2011, the overall number of conducted inspections to businesses was 6396, out of which: 4273 were regular inspections, 1204 were repeated inspection to see whether the employer had acted upon remarks received from the labour inspectorate, to eliminate the weaknesses identified and to act in compliance with legal provisions; 308 were inspections conducted upon request of the party, in order to fulfil the rights of labour relations, safety at work, protection of employee health and working environment, and 611 were joint inspections with other supervision institutions in order to fight informal economy. Punishing measures were prescribed to 872 cases, from which the measure of written notice to 736 cases and fines were written to 136 businesses ³⁹.



Annual budget of the Labour Inspectorate has constantly been insufficient and as such it has posed obstacles to increase of the number of inspectors. Since 2011, Labour Inspectorate's budget was cut every year. In 2011, the budget allocated to the Labour Inspectorate was in the amount of 557 720 Euros; in 2012, a small increase of the budget occurred and it was at 565 720 Euros, while in 2013, the budget for the institution was cut to 515 720 Euros. The same amount was allocated in 2014 as well. Although the Labour Inspectorate constantly had requested increase of the budget, such a request was not approved by the Kosovo Government⁴⁰. For 2015, this body has submitted a

38 2012 Labour Inspectorate Report .

39 2011 Labour Inspectorate Report.

40 Interview with chief inspector Mr. Basri Ibrahim

request for a budget in the amount of 947 740 Euros ⁴¹.

41 Ibid

Conclusions and recommendations

- Employee rights in Kosovo continue not to be respected to a large extent by employers. The issue of safety at work, in particular for workers of the construction sector, remains extremely concerning. The number of employees that lose their lives at the workplace has increased in recent years. Further, these workers were not insured and as a result their families do not receive any financial support⁴². Also, while there are no official data, the number of employees that harm their health at the workplace is concerning. In many cases, employees work without being equipped with protective equipment at workplace.
- Although, the legislation that regulates employee-employers relations and employee rights in genera is relatively good, its implementation is extremely poor. Trade unions of employees, as mechanisms to protect their rights, are still not at the required satisfactory levels. Trade unions are not as yet a strong voice that protects employee rights. Furthermore, in many cases they are politicized and were used by the government to buy silence of the employees.
- The legal framework, while being relatively good, must be supplemented with other by-laws that facilitate law enforcement. Line ministries must adopt by-laws and put into place their mechanisms for respecting and protecting employee rights.
- The Government must increase capacities of respective bodies for supervision and implementation of employee rights. The Labour Inspectorate must be strengthened in terms of human capacities, through provision of trainings and other forms of capacity building, as well as allocation of larger financial funds and other supporting facilities⁴³. To inspect all businesses in Kosovo, based on the performance of the Labour Inspectorate in 2013, it will take 450 inspectors so that they guarantee full implementation of labour legislation.
- On the other hand, the Labour Inspectorate must be more efficient in performing its tasks. It is insufficient that an inspector inspects only 167 employers during 220 working days, which means they don't manage to inspect even employers a day on

42 Interview with Mrs.Shukrije Rexhepi, BSPK legal officer

43 http://eeas.europa.eu/delegations/kosovo/documents/eu_kosovo/20140520_conclusions_sapd-inno_2014_final.pdf

average⁴⁴.

- The Labour Inspectorate must create a special and specialized team⁴⁵ only for the field of safety and health at workplace. Currently these inspections are conducted by inspectors who also conduct inspections of other nature.
- Strengthening the rule of law and efficiency of the judicial system significantly affects respecting of employee rights. Cases of violation of employee rights and the Labour Law must be reviewed with priority by specialized courts, while employers that violate the law and employee rights must be punished.

44 The Republic of Macedonia had 107 inspectors in 2012, and they had inspected 34 275 employers, where one inspector inspected about 320 employers on average, or twice and a half more their counterparts in Kosovo. See Macedonia's 2012 Labour Inspectorate report at http://dit.gov.mk/godisnilzvestai_full.php?id=2012.

45 Macedonia's Labour Inspectorate has 38 out of 109 inspectors specialized in area of safety and health at work. See <http://dit.gov.mk/al/oblasti.php>.

About Center for Policies and Advocacy (CPA)

Center for Policy and Advocacy(CPA) was established in 2008. CPA is a non-for-profit, non partisan organization aiming to strengthen and promotes an active citizenry; citizens' participation in designing, implementing and monitoring of public policies. CPA also aims to influence decision making structures through lobbying and advocacy, to raise issues that are on the interest of citizens and make them part of government agenda. CPA will work to increase transparency, responsibility and accountability of political and public officials towards citizens

To achieve its goals, CPA will undertake the following activities:

- Organize advocacy and media campaigns
- Organize conferences, debates and roundtables
- Draft reports, recommendations on public policies
- Organize trainings, consultancy on the field of public policies
- Support and be part of other Civil Society initiatives

CPA is a member of several local and international networks including; The World Justice Forum (www.wjp-forum.org), The Euclid Network (www.euclidnetwork.eu), CiviKos (www.cso-ks.org), Democracy in Action (www.demokraciaveprim.org), The Justice and the People (www.justiceandthepeople.org).

The main projects: The main projects: For more transparent judiciary (2014), We deserve a clean environment (2014), Monitoring of parliamentary elections (2014), Protection of river White Drin from degradation (2013), Monitoring of implementation of Strategy for integration of RAE community(2013), Provide legal assistance to Office of Prime Minister's (OPM) (2012-2013), Political and social right of Diaspora (2012-2013), Monitoring the implementation of labor law (2012), Provide research and analyses on best practices of legislation drafting (2012), Monitoring implementation of the right to information (2012), The better informed more protected you are (2011), Initiating the Law on legislative Initiatives (2011), Road Safety (2011), Facilitate participation of civil society in EU integration and Visa liberalization process (2011), Facilitate public participation in law making process (2010-2011), Public Seminars on Independent Oversight board (2010-2011), Increase transparency and civic participation in law making process(2010). For a better environment. (2009), Increasing transparency of

public institutions (2009), Helping citizens to have better access to public information (2009).



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