

**SUBMISSIONS TO THE SPECIAL RAPPORTEUR ON VIOLENCE
AGAINST WOMEN, ITS CAUSES AND CONSEQUENCES
ON SHELTERS**

Bosnia and Herzegovina

Croatia

Macedonia

Montenegro

Serbia

Slovenia

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BOSNIA AND HERZEGOVINA

United Women, Banja Luka

In Bosnia and Herzegovina, establishment and functioning of safe houses is regulated by laws on protection from domestic violence in the two Entities: in the Republic of Srpska (RS)¹ and the Federation of BiH (FBiH)². In the RS, shelters can be founded by legal entities³. Accommodation for victims is provided on the basis of decision of the competent centre for social work (CSW), with the victim's consent. Victim has a right to submit a request for using a special support measure-temporary accommodation in a safe house to the competent CSW or social care service⁴. Funds for this service are allocated in the amount of 70% from the budget of the RS and 30% from local municipalities, in accordance with the price of accommodation, which is determined by the Minister of Family, Youth and Sport, once a year⁵. In the FBiH, safe house can be founded by both natural persons and legal entities⁶. Apart from sheltering in safe house, victims can be also sheltered in other competent institutions or in another family⁷, on the basis of a decision by the guardianship authority, with the victim's consent, which has no legal possibility to obtain independently the implementation of this measure. Funds for this service are allocated in the amount of 30% from the Canton budget and 70% from the budget of FBiH⁸.

In the RS, by-laws set detailed standards in terms of space, equipment and staff that are to be fulfilled by a legal entity which run a shelter, their entry in the register, as well as prescribed means of allocation of funds to shelters⁹. In the FBiH, there is no Regulation that provides standards for the establishment, operation and funding of shelters. In 2015, the Parliament of FBiH discussed the Draft Law on amendments to the Law on Protection from Domestic Violence which provides for changes in the means of establishment, status, funding and monitoring over the work of safe houses in FBiH. With this Draft, non-governmental organizations are excluded from the system of protection from domestic violence and there is no recognition of the importance and significance of their long-term work and experience in providing support to victims of domestic violence.

There are 8 active shelters (5 in the FBiH and 3 in the RS), which are run by women's NGOs¹⁰. In the Brčko District there are no shelters. At the beginning of 2016, one shelter in Mostar was closed because of the lack of financial support. The total capacity of the shelters is 175 places (beds), of which 55 beds in the RS and 120 in the FBiH. Bosnia and Herzegovina meets less than half of the Council of Europe standards on the shelter accommodation (46%) that require 379 beds in shelters¹¹. Victims can be placed in shelter accompanied by their children. The laws do not define an age limit of beneficiaries, but there is a practice of not

¹ Law on Protection from Domestic Violence, *Official Gazette of the Republic of Srpska*, No. 102/12, 108/13, 82/15

² Law on Protection from Domestic Violence, *Official Gazette of the Federation of Bosnia and Herzegovina*, No. 20/13

³ Article 15. paragraph 3. Law on Protection from Domestic Violence of the Republic of Srpska

⁴ Article 15. paragraph 1. Law on Protection from Domestic Violence of the Republic of Srpska

⁵ Article 18. Law on Protection from Domestic Violence of the Republic of Srpska

⁶ Article 35. paragraph 1. Law on Protection from Domestic Violence of the Federation of BiH

⁷ Article 34. Law on Protection from Domestic Violence of the Federation of BiH

⁸ Article 35. paragraph 2. Law on Protection from Domestic Violence of the Federation of BiH

⁹ Regulation on standards for the realization of safe houses, *Official Gazette of the Republic of Srpska*, No. 25/13, Regulation on the content and method of keeping the registry of safe houses, *Official Gazette of the Republic of Srpska*, No. 25/13, Regulation on the method of allocating funds to the safe houses, *Official Gazette of the Republic of Srpska*, No. 62/13, Decision (which established the prices of sheltering victim of violence in safe house pro month in the amount of 1.668,00 BAM), *Official Gazette of the Republic of Srpska*, No. 10/16.

¹⁰ *Report of civil society organizations on implementation of the concluding observations and recommendations of CEDAW committee for Bosnia and Herzegovina 2013-2017*, <https://hcabl.org/wp-content/uploads/2016/11/CEDAW-ENG-web.pdf>, p. 54-55.

¹¹ Rosa Logar and the WAVE Team (2016). *WAVE Report 2015 on the role of specialist women's support services in Europe*, WAVE – Women against Violence Europe, Vienna, available at: http://files.wave-network.org/researchreports/WAVE_Report_2015.pdf

placing all adult males, specifically boys over 18 years, in accompaniment of their mothers. The length of stay in shelters in the RS may not last longer than six months, provided that, in justified cases, it can be extended for another six months, or until the completion of the procedure and the execution of the decision by which the protective measure is imposed on perpetrator¹², and in Federation of BiH, these six months, on the request of safe house, can be extended with the written consent of the competent guardianship authority¹³.

The practice in BiH points out the difficult access to the shelter accommodation. In the RS, apart from the legally constituted victim's right to obtain accommodation in the safe house, competent CSW delivers its decision only if the victim has no family members or friends with whom she could be sheltered, and they often refuse to deliver decision in order to avoid paying the accommodation expenses. The experience of safe houses in BiH points out that CSWs plan in advance the number of victims that are going to be in safe house during the year and they do not want to increase it. The example of good practice in BiH is Safe House in Sarajevo that is run by Foundation of Local Democracy. Canton Sarajevo is the only local municipality on the whole territory of BiH, that has systematically solved the funding of the work and functioning of Safe House in a manner of signing the agreement on co-financing of a victim's stay in shelter between Foundation of Local Democracy and Ministry of Labor, Social Policy, Refugees and Displaced Persons of Canton Sarajevo and Cantonal Center for Social Work (CSCW). In that manner, the funds for the accommodation of beneficiaries in Safe House are allocated in the amount of 70% from the total costs. CSCW do not adopt pre-planned budget, and the accommodation of victims is being conducted in accordance with the report of violence and the need to accommodate victim. There was no single situation, that because of lack of funds, it was impossible to shelter victim in safe house. Other safe houses on the level of FBiH did not manage to regulate in the same way the participation in costs of sheltering victims in safe houses¹⁴.

¹² Article 15, pa. 5. and 6. Law on Protection from Domestic Violence of the Republic of Srpska

¹³ Article 33, pa. 2. and 3. Law on Protection from Domestic Violence of the Federation of BiH

¹⁴ Petrić, Aleksandra and others, *Alternative CEDAW report – Report of civil society organizations on implementation of concluding observations and recommendations of CEDAW Committee for Bosnia and Herzegovina 2013-2017*, Helsinki Citizens Assembly Banja Luka and Rights For All Sarajevo, November 2016, available on: <https://hcabl.org/wp-content/uploads/2016/11/CEDaW-WEB-final-novembar-2016.pdf>, pages 54-56

CROATIA

Autonomous Women's House, Zagreb

In Croatia there are *autonomous women's shelters* run by women's non-governmental organizations (NGOs) and "*State homes*". Autonomous women's shelters are operated by NGOs founded by women's groups and operating according to the Law on non-governmental organizations. They are self-regulating and are independent of state bodies, political parties, religious organizations, and private companies. However, in recent years there have been efforts by the Government to impose rules and restrictions on running autonomous women's shelters. The Government has set criteria for operating the shelters under the *Regulations for minimum standards for social service provision*¹⁵. Under these Regulations, which were not created in cooperation with the shelters, but entirely arbitrarily by the State, the shelters are required to obtain a "license" in order to prove that they comply with the Government rules. They are then subject to both regular and *ad hoc* inspections by the State officials. There are three serious problems with this approach. First, most of the shelters were opened before these Regulations were passed and with little or no help from the State, which means that they didn't have as much State funding for opening the shelters as State homes, so they are operated from flats that may not have all the amenities as State homes, but are still in decent conditions and able to work according to general standards for such shelters. Second, for those shelters that have a secret address (address that is an official secret such as Autonomous Women's House Zagreb), the licensing and inspection requirements pose a significant threat to exposing the secret address and putting women, children and shelter workers in danger. In such cases, there are no provisions that would allow for off-site inspections. Such off site inspections would ensure the safety of the shelter address, while still giving the State insight into the quality of the programs. Third, the Government really only provides a small portion of the yearly funding necessary for operation of the shelters, while trying to impose on shelter autonomy. Shelters are a part of the women's movement and of civil society. Therefore, they need to remain independent in order to do their work. "State homes" are state, city or county institutions that may or may not have been opened in cooperation with an existing NGO or through the creation of a new NGO. Such a home may offer care to wards of both sexes, victims of domestic violence, addicts, homeless persons, victims of trafficking, asylum seekers, and migrants, among others. State, city, and county homes must comply with regulations and are operated under the Law on Social Welfare.

The Council of Europe Taskforce Recommendations requires 428 shelter spaces for victims of domestic violence in Croatia. In Croatia, there are 7 autonomous women's shelters and 10 state/city/church run shelters as described above. Croatian shelters and state, church and city homes provide only 267 spaces. State homes and autonomous women's shelters have the same number of beds: 141 and 142 beds¹⁶.

There are two types of financing, one for the shelters and one for the State homes. State homes and church homes, as well as NGO state homes are financed on a per-bed scheme. Each month, they receive a fixed sum per person who stays in the shelter. This type of funding depends on the referral from the Centre for Social Welfare (CSW) and is conditioned upon the requirement to report violence to the police. Since it is the CSW that makes the decision whether the woman needs the shelter and for how long, the typical length of stay is a few months, so women don't have the time to resolve their situation and gain independence

¹⁵ *Official Gazette of the Republic of Croatia*, No. 40/2014, available at: [Pravilnik o minimalnim uvjetima za pružanje socijalnih usluga](#)

¹⁶ *Consideration of Reports Submitted by States Parties under Article 40 of the Covenant Pursuant to the Optional Reporting Procedure: Third Periodic Reports of States Parties Due in October 2013: Croatia*, Human Rights Committee Jan. 8, 2014, ¶100-01

from the violent partner. The typical length of stay at the autonomous shelters is longer, normally up to a year, which means that autonomous shelters have a much higher rate of success in preventing further violence. There are no referral requirements, which mean that the woman has more access to the shelter. **However, since the State is reducing the autonomy of the shelters more and more, some shelters are starting to operate more like state homes.** For example, at one shelter, the CSW brought a decision that child contacts with the violent father should take place at the shelter/counselling center, instead of in one of the state institutions. This means that the shelter workers and the woman are not safe and have to cooperate with and accommodate the abuser, which is not the job of the shelters. The location of these shelters is also not secure anymore now that they have to comply with this type of decisions.

The financing of the autonomous women's shelters had reached security in 2009 when at the time 5 shelters signed contracts with the State, the city and the county to receive a total of 90% of their yearly budget. This was supposed to be a permanent solution, but there were funding cuts since 2010 and this model doesn't exist anymore. Instead, the shelters are back to writing projects to various institutions to receive yearly funding, while the Ministry for Demography, Family, Youth and Social Policy provides a three-year program-based funding, but with severe cuts. For example, Autonomous Women's House Zagreb received 185.000,00 kn less from the Ministry, which means that instead of 30%, AWHZ now receives only about 17% of its yearly funding from the State. **Therefore, the funding for autonomous women's shelters is no longer secure or sufficient, while at the same time there are new regulations preventing shelters from doing their independent work in protection women and children.**

However, the new Minister seems more open to cooperation with the shelters, so we hope to regain some of the rights and hopefully create new standards for the shelters.

Shelters typically provide housing to victims for a limited period of time, often between six and twelve months. Many NGOs allow extended stays where circumstances warrant, but due to capacity constraints, shelters are unable to provide a long-term solution. Once they leave a shelter, victims' housing options are limited. There is no state-subsidized housing specifically for victims of domestic violence, although the status of victims of violence can increase eligibility in some cases, for example in the city of Zagreb.

We can safely say that in Croatia there is no second and third stage housing. This is an area where shelters could expand their work, but while there is no secure and adequate funding for first stage shelters, there can be no hope to create good alternative housing programs.

Recommendations:

1. The State should provide regular and adequate funding to autonomous women's shelters, while respecting the autonomy of their work.
2. The State should further make sure that the Shelters with secret address have a special approach that respects the value of such programs, such as ensuring off-site inspections and granting the license after performing an inspection through video-link, instead of endangering the address and safety of women and children.
3. The State should create special programs for free housing for women survivors of violence as well as fund NGO shelter initiatives to create second stage housing.

MACEDONIA

National Council for Gender Equality, Skopje

Protection and accommodation in shelters are performed according to the bylaws of the Government of Macedonia and in accordance with national regulations. These categories including children, according to the Law on Social Protection and the Family Law are appropriate forms of protection and accommodation. Accommodation for all of these beneficiaries is free of cost and is covered by the Ministry of Labour and Social Policy.

On the territory of Macedonia there should be at least 20 shelters with a capacity of at least 8 seats/beds. According to the available data, in the country **there are 4 state shelters** that provide accommodation for 30 victims up to one year. These shelters are organizational unit of the centres for social work (CSWs) and the shelter workers are employed in CSW. Victims who are high at risk are accommodated in these shelters. Macedonia has no specific specialized shelters for women with disabilities. Migrant women victims of violence are not accommodated in shelters for victims of domestic violence, but they are provided with a special centre or Safety House which is under the umbrella of the NGO's and is funded by the Ministry of Labour and Social Policy. In addition, there are **2 crisis centres** operated by non-governmental organizations (one provides accommodation for up to 6 months and the other provides emergency housing for up to 48 hours). These services have been set up for victims of domestic violence and violence by intimate partner, and also provide accommodation for women (mothers) and their children. Geographically, one shelter is located in Skopje and the rest are located in Sveti Nikole, Kochani and Bitola. The two crises centres operated by non-governmental organizations are also located in Skopje. Taking into account this information, one can easily come to the conclusion that providing a safe place to stay for women victims of violence is far from satisfying the real needs and standards.

The Ministry of Labour and Social Politics keep records of the victims who are accommodated in the shelters. The total number of victims accommodated in the four shelters is 43, of which 23 women, 1 man and 19 children.

MONTENEGRO

Women's Safe House, Podgorica

The *Law on Social and Child Protection*¹⁷ defines the right to accommodation services including accommodation “in the institution, the refuge – shelter, and in other types of accommodation”. Furthermore, the Law foresees that shelters should be financed by the local municipalities, but all shelters are run by women’s civil society organizations (CSOs) and mainly funded from the foreign funds and donations, while the state assistance is sporadic and insufficient. The strategic documents have introduced the system of licensing for CSOs that provide social and child protection services, including the shelter accommodation. The license for social protection service providers shall be issued by the Ministry of Labour and Social Welfare. There are no common standardized procedure and standards for admission to the shelter for victims of violence, neither the shelters functioning rules and regulations, and each shelter has its own procedures and rules. Victims can approach the shelter directly or can be referred by the state authorities. According to the *Protocol on the Treatment, Prevention and Protection from Domestic Violence*¹⁸ jurisdiction of the police officer is to inform the victim about the possibility to get accommodation in a shelter and, if it is necessary, to transfer the victim to the shelter. The competence of Center for Social Work (CSW), among other things, is to establish cooperation with the shelter or CSO that provides accommodation for victims. The initiation of judicial proceedings is not a prerequisite for women to be provided with the accommodation in a shelter.

In Montenegro, there are 3 shelters for women victims of violence with the total capacity of 44 places (beds), which means that Montenegro lacks 18 places or 71% of the capacities recommended by the Council of Europe¹⁹. The shelter accommodation services are not equally available to women and children victims of violence due to their uneven geographical distribution: one shelter is in the north and two of them in the central part of Montenegro. All accommodation services, legal and psychosocial support and assistance provided within the shelters are free of charge for beneficiaries. Two of the three shelters provide support programs for members of Roma population and migrants, while the shelters are inaccessible for women with disabilities. The shelters are open 24 hours a day, 7 days a week, and individual plans are regularly prepared for women victims of violence. In 2015, the shelters provided accommodation for a total of 171 women and 198 children survivors of violence²⁰. Those shelters are mainly financed from the foreign donations (70%), less from the state funds in the form of sporadic financing based on public calls and tenders (15%) and only 5% by private donors²¹. In all shelters the staff is obliged to complete training before the engagement.

There are no common standardized rules on the length of stay of the victims in a shelter. As regard to an age limit for children, each of the three CSOs has defined its own internal rules. The Women’s Safe House in Podgorica cannot provide a minor with the shelter accommodation without a parent or legal guardian. Besides that, older male minors cannot stay in the shelter with their mothers if there are girls older than 14 years. On the other hand,

¹⁷ *Official Gazette of Montenegro No. 27/2013*, article 64, available at:

<http://www.sluzbenilist.me/PravniAktDetalji.aspx?tag=%7BA59F86F8-0A40-46FC-9E5E-B7F6EFDB3101%7D>

¹⁸ *Protocol on the Treatment, Prevention and Protection from Domestic Violence*, November 2011, available at: <http://sudovi.me/podaci/vrhs/dokumenta/641.pdf>

¹⁹ R. Logar and WAVE Team (2016). *WAVE Report 2015 on the role of specialist women’s support services in Europe*, WAVE – Women against Violence Europe, Vienna, available at: http://files.wave-network.org/researchreports/WAVE_Report_2015.pdf

²⁰ *Ibid.*

²¹ M. Lesur, Stelmaszek, B. and Golden, I., (2014). *WAVE Country report for 2013 – Reality check on European services for women and children survivors of violence: A right for Protection and Support?*, available at: http://files.wave-network.org/researchreports/COUNTRY_REPORT_2013.pdf

the SOS shelter for women and children victims of violence Nicsic has an age limit for boys older than 15 years, and provides the shelter accommodation for girls older than 14 years even without the presence of their parents or legal guardians.

Recommendations:

1. The State should provide a sufficient number of easily accessible shelters for women and children victims of violence.
2. The State should provide regular and adequate funding to autonomous women's shelters, while respecting the autonomy of their work.

SERBIA

Autonomous Women's Center, Belgrade

In the Republic of Serbia, the provision of accommodation in a shelter is regulated by the *Law on Social Protection (LSP)*²² and the *Rulebook on Detailed Conditions and Standards for the Provision of Social Services*²³. In accordance with the LSP, the provision of such accommodation (organising services and funding) falls under the competence of local self-governments, which includes the temporary accommodation and ensures the safety of beneficiaries, sustainable solutions to crisis situations, meeting their basic needs and access to other services (art. 55). The Rulebook defines *minimum common standards for all accommodation services*, including shelters for victims of domestic violence, which are not gender sensitive. It is specified that the accommodation services are provided 24 hours a day, throughout the year (art. 41). The accommodation in a shelter is provided no longer than six months to children, youth and adult victims of domestic violence, abuse and neglect. *Specific minimum structural standards* for shelters, in terms of location, facilities and equipment, prescribe that the service provider, if necessary, has a procedure for ensuring the secret location and safety of beneficiaries, as well as that the service provider shall provide a special room for a mother with child/children (art. 58).

The official data shows that there are 15 shelters for victims of violence in Serbia, most of which (14) are run by the state service providers – Centre for Social Work (CSW) or Centre for Services Provision²⁴. Their total capacity is 272 places (beds), which mean that Serbia does not meet the Council of Europe standards, according to which there should be 719 places (beds) in shelters. The services in most shelters (93%) are available free of charge for beneficiaries and only one shelter requires participation of beneficiaries in the cost of services. Dominant funding sources for the services in those shelters are the local government budgets (73%) and donations (20%). Out of 80 engaged shelter workers, less than half (47.7%) are professional shelter workers (social workers, psychologists, pedagogues, psychiatrics and lawyers). In more than half shelters (53%) the entire staff has completed the accredited training and the majority of the staff is trained in a fifth of shelters. In 2015, those shelters provided accommodation for total of 642 beneficiaries, of which 487 were women.

Practical experience and research show that some state shelters do not recognize the gender dimension of domestic violence. Recent research results pointed out that only 60% of shelters (9 out of 15) are specialized for assisting women and children victims of violence²⁵. Only less than half of all shelters are accessible for women and children with disabilities. Most of them are open 24/7 for the emergency accommodation and more than half of them provide services free of charge (58%). Only 1/3 of shelters replied that accommodation is available even without referral from the CSW.

In the licensing process for social protection services providers, only 4 shelters have so far been licensed to provide accommodation for victims of domestic violence, of which three

²² *Official Gazette of the Republic of Serbia No. 24/2011*, available at: http://paragraf.rs/propisi/zakon_o_socijalnoj_zastiti.html

²³ *Official Gazette of the Republic of Serbia No. 42/2013*, available at:

<http://www.minrzs.gov.rs/files/doc/porodica/licenciranje/PRAVILNIK%20O%20BLIZIM%20USLOVIMA.doc>

²⁴ Database of social protection services under the competence of local self-government-Annex 2 to the *Mapping Social Protection Services at the Local Level in 2015 in the Republic of Serbia*, Social Inclusion and Poverty Reduction Unit of the Government of the RS, Republic Institute for Social Protection and the Standing Conference of Towns and Municipalities, 2016, available at: http://socijalnoukljucivanje.gov.rs/wp-content/uploads/2017/01/Mapiranje_usluga_socijalne_zastite_2015_Aneksi.zip

²⁵ *Shadow Report of the Autonomous Women's Center (AWC) on the Follow-up state's report to the Concluding observations of the Committee*, Autonomous Women's Center, 2016, available at: http://www.womenngo.org.rs/images/CEDAW/2013/INT_CEDAW_NGS_SRB_23731_E.pdf

are state-owned and one shelter is run by non-governmental organization²⁶. Three shelters provide specialized accommodation for women and children victims of violence with total capacity for 51 beneficiaries, and one shelter is licensed to provide accommodation for 15 children, youth and adult beneficiaries.

Since the provision of accommodation in a shelter is the local social protection service, the state has no control over it, neither there is a plan created by the state of the necessity to build shelters. Besides the inadequate institutional infrastructure for providing sheltered accommodation, the quality and availability of those services are influenced by the fact that shelter funding is mostly based on the funds from the local budgets and donations. The shelters are not easily accessible to victims because of their inadequate geographical distribution and the fact that women must be provided with the referral form from the CSW in order to access the safe house. Access to shelter is even more difficult for women (and their children) whose residence is different from the municipal territory of a shelter, because of the obligation that their municipal CSW cover the shelter costs. The findings of the Independent Regulatory Bodies have confirmed that women in situations of acute domestic violence (currently occurring violence) are not always provided with sheltered accommodation in safe houses or shelters²⁷. On the other hand, some research results indicate that the possibility of providing women who have experienced violence with the accommodation in a shelter is insufficiently used²⁸.

Recommendations:

1. The state should ensure that women survivors of violence have direct access to shelters on their own initiative, without requirement to apply to other state institutions.
2. The competent ministries should create a plan for the establishment and funding to shelters on the regional level, with contributions from the municipal and state budgets, in order to make sheltered accommodation sustainable and available throughout the country.
3. It is necessary that all local documents precisely regulate accommodation of women survivors of violence in shelters, as well as all issues related to housing (second and third stage housing, social housing, subsidies for housing and communal services).

²⁶ *List of licenses for shelters for victims of domestic violence*, Ministry of Labour, Employment, Veteran and Social Affairs, updated in December 2016, available at:

http://www.minrzs.gov.rs/files/2016_godina/Briga_o_porodici/Usluge_socijalne_zastite/30.12/SPISAK_LICENCI-Prihvatile_za_zrtve_nasilja.doc

²⁷ *Protector of Citizens 2013 Annual Report*, Protector of Citizens, Belgrade, 2014, available at: <http://www.ombudsman.rs/attachments/2013%20Annual%20Report%20of%20the%20Protector%20of%20Citizens.pdf>

²⁸ Nikolić-Ristanović, V., (ed.) (2010), *Domestic violence in Vojvodina*, Novi Sad: Provincial Secretariat for Economy, Employment and Gender Equality.

SLOVENIA

Association SOS Help-line for women and children – victims of violence, Ljubljana

There are 16 women's shelters on hidden locations in Slovenia. They are run by 14 different organizations: 4 CSWs, 12 NGOs (11 women's NGOs with gender-specific/feminist approach and 1 faith-based organization). Among the 16 women's shelters, one accommodates women survivors of domestic violence who are also battling drug addiction. Women's shelters are present in all regions of the state. Women can stay in shelters up to one year, some shelters have dislocated units (apartments) where women can go after their stay in shelter is finished. The only criterion for entering shelter is experience of violence (mostly women have experience of domestic violence and/or intimate partner violence). Boys older than 16 years old are not allowed to stay in shelters, for them different form of accommodation is arranged. Consultation to present the rules of shelters and to get to know the situation of women is necessary prior of the accommodation.

Furthermore, there are 3 crisis centers for women and children – victims of violence. They are run by 3 different organizations: 2 CSWs and 1 women's NGO. Crisis centres are available 24 hours and can accommodate women victims of violence immediately in contrast with shelters where prior consultation is need for entering. Usually women stay in crisis centers up to three months as this is for immediate crisis situations. There are also 11 maternity homes. They are run by 8 different organizations: 2 CSWs and 6 NGOs (2 women's NGOs and 4 faith-based organizations). In contrast with shelters they are not on hidden locations. The number of women and children staying in these programs is every year published in the report on the implementation of programs by the Social Protection Institute of the Republic of Slovenia available on their web page²⁹.

Based on Council of Europe Taskforce Recommendations, approximately 204 women's shelter places (number includes all mentioned forms of accommodation) are needed in Slovenia. With approximately 273 beds available (89 rooms)³⁰, Slovenia meets the Council of Europe Taskforce Recommendations on provision of women's shelters.

We can claim that a network of shelters is very well developed and regionally accessible. But other services for victims of violence (especially independent NGO services) are mainly accessible in bigger cities.

In Slovenia we have so-called Network of programs for violence prevention, support for victims of violence and work with perpetrators of violence that is part of social welfare programs and programs are cofounded by the Ministry of Labour, Family, Social affairs and Equal Opportunities. Ministry fund welfare programs up to 80 % but in average 60,8 %³¹. Usually other funds for shelters come from municipalities and donations. Most common forms of governmental funding are one-year and five-years core funding. Funding allocated in 2015 amounted to EUR 2.459.045,31 EUR³².

Women staying in shelters pay certain amount that is around 80 eur, if she has children amount increase. For women without financial sources accommodation is free. Especially

²⁹ Smolej Jež, S., Kovač, N., Vidrih, N., Žiberna, V. (2016) *Monitoring the implementation of social protection programs*, Report on the implementation of the reports in 2015, Final report, Ljubljana: Institute of the Republic of Slovenia for Social Protection, Ministry of Labour, Family, Social Affairs and Equal Opportunities, Directorate for Social Affairs. Available at: https://www.irssv.si/upload2/SVP%20koncno_16.%205.%202016.pdf, 21. 11. 2016.

³⁰ Ibid, page 29.

³¹ Ibid.

³² Official letter from the Ministry of Labour, Family, Social Affairs and Equal Opportunities, Directorate for Social Affairs, Ferlan Istinič, M. Provision of data on prevention of violence, 2nd of October 2015.

difficulty is the situation of women (migrant or refugee) victims of violence without any legal status, when they are not eligible for social aid or to have health security insurance.

There is an informal network in Slovenia, organized as the Section for Safe Houses, Maternity Homes and Related Organizations in Slovenia, at the Social Chamber of Slovenia.

The section includes 19 non-governmental and governmental organizations working in the field of preventing family violence: safe houses, crisis centers, maternity homes and women's counseling centers. The mission of this network is to ensure coordination and representation of interests of the organizations.

There is also 1 safe place / shelter, specialized for women – victims of trafficking, but it is not included to this group.

Recommendations:

1. The State should withdraw the reservation on the Article 59 of the Istanbul Convention to provide women victims of violence without status or when residence status depends on that of the spouse or partner as recognized by internal law arrange special status on the basis that they are victims of violence.
2. The State should arrange different forms of accommodation – flats for women survivors of violence after their stay in shelter is finish.