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THE PROTECTOR OF
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**NATIONAL PREVENTIVE
MECHANISM AGAINST TORTURE**

Report
on the Monitoring of the Treatment of Refugees
and Migrants

Belgrade, 2015

NATIONAL PREVENTIVE MECHANISM AGAINST TORTURE MANDATE

The Act on the Ratification of the Optional Protocol to the Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishments¹ stipulates that the National Preventive Mechanism against Torture (NPM) pays visits to institutions where persons deprived of liberty are or can be situated, with the aim to prevent public authorities and officials from any form of torture or any other form of abuse, and to direct public authorities towards creating accommodation and other life conditions in the institutions for accommodation of persons deprived of liberty in line with the current provisions and standards.

NPM has the right to: an unimpeded and unannounced access at all times to all places where persons deprived of liberty are or may be placed; talk in private with those persons and all the officials who are obliged to cooperate on that matter, and all other persons who may have information relevant to the treatment of persons deprived of their liberty; access to all documentation related to these persons; send recommendations to the competent authorities in order to improve the treatment of persons deprived of their liberty and improve the conditions in which they are detained or where they reside.

Article 2a of the Act provides that the Protector of Citizens performs the activities of the NPM and in that process cooperates with the Protectors of Citizens of autonomous provinces and associations whose statute provides the aim of alliance to be the enhancement and protection of human rights and freedoms, in line with the law.

The Protector of Citizens and the Protector of Citizens in Vojvodina signed a Memorandum on cooperation with regard to performing activities of the NPM², which provides that the Provincial Protector of Citizens shall participate actively in the NPM monitoring team's visits to institutions where persons deprived of liberty are situated, on the territory of Vojvodina.

On the basis of the conducted procedure at a public call³, the Protector of Citizens has selected associations for cooperation in performing the activities of the NPM, namely the Belgrade Centre for Human Rights, the Victimology Society of Serbia, the Dialogue, the Mental Disability Rights Initiative of Serbia (MDRI-S), the Lawyers' Committee for Human Rights (YUCOM), the International Aid Network (IAN), the Human Rights Committee - Valjevo, the Helsinki Committee for Human Rights in Serbia and the Centre for Human Rights - Niš.

Following the visit, the NPM composes reports which are delivered to the visited institution. Thereafter, the NPM maintains constant dialogue with the visited institution, and the authority whose structure the institution belongs to, with the aim to remove determined irregularities which may cause torture, inhuman or demeaning actions.

While performing the activities of the NPM, the Protector of Citizens sent a recommendation no. 75-6/14 with the effect from 10 February 2012 to the competent authorities. In fact, while investigating the legality and regularity of the procedures, and the application of the existing standards towards the asylum seekers, i.e. migrants found in Serbia, the NPM has noted that public authorities have not established a systemic approach which enables efficient procedures in accordance with the current rules and regulations and international standards in the area of asylum and migrations.

¹ "Official Gazette of Serbia and Montenegro - International Agreements", no. 16/2005 and 2/2006 and "Official Gazette of RS - International Agreements", no. 7/2011.

² Signed on 12 December 2011.

³ Published on 29 December 2011 in the "Official Gazette of RS".

1. INTRODUCTION - VISITS OF NATIONAL PREVENTIVE MECHANISM AGAINST TORTURE IN 2015.

Performing the activities of the National Preventive Mechanism against Torture, in cooperation with the Belgrade Centre for Human Rights, the Protector of Citizens made the total of 59 visits in 2015, with the aim to investigate the actions of public authorities in accordance to the existing rules and regulations and international standards towards refugees and migrants. Institutions visited are: police directorates and police stations within their structure; regional border police centres; asylum centres; reception centres; Reception Centre for Foreigners in Padinska Skela; Nikola Tesla Airport; reception units for accommodation of unaccompanied underage foreigners; social work centres and correctional facilities. Out of the total number of visits, 50 visits were announced while nine visits were made without notifying public authorities in advance. Based on the visits, the total of 30 reports were composed.

Having noticed irregularities in their actions, and with the aim to enhance the position of refugees, the NPM sent 36 recommendations to public authorities.

2. POLICE DIRECTORATES

During the course of 2015, the NPM visited 15 police directorates in Serbia, while the total number of visits is 18 (PD Kikinda, PD Vranje and PD Pirot were each visited twice during the year). The visits were made both in the police directorates and police stations within their structure, namely: PD Zaječar, PD Valjevo, PD Šabac, PD Prokuplje, PD Pirot, PD Niš, PD Kraljevo, PD Kragujevac, PD Kikinda, PD Čačak, PD Bor, PD Sombor, PD Vranje, PD Subotica and PD for the city of Belgrade.

After the visit to the Police Station in Kanjiža in September 2015, the NPM issued the following recommendation:

- **“Having in mind great load and enlarged scope of work due to the increased influx of refugees and migrants on the territory of PD Kikinda, the NPM is of the opinion that the Ministry of Interior should consider the requests of PD Kikinda for additional vehicles.”**

The Ministry of Interior responded to this recommendation in the following manner⁴:

“The Border Police Directorate of the Ministry of Interior has initiated, through the Sector of Finance, Human resources and Common Affairs, the process of providing suitable vehicles for the need of police officers of PD Kikinda - Border Police Directorate for Foreigners, Prevention of Illegal Migration and Trafficking.”

After the visit to PD Kikinda and the RBPC (Regional Border Police Centre) towards Hungary in September 2015, it was observed that a significant number of refugees from war inflicted areas were charged with a misdemeanour and that the standards for this practice were quite different at different police directorates; therefore, the NPM issued the following recommendation to the Ministrz of Interior:

- **“... the NPM is of the opinion that the Ministry of Interior is to take steps within its authority in order that requests are not submitted for initiation of misdemeanour proceedings for illegal state border crossing nor illegal residence proceedings against persons who fled war inflicted countries.”**

The Ministry of Interior responded to this recommendation in the following manner⁵:

⁴ Response of the Ministry of Interior, 03/10 no. 07-4195/15-1, from 10 November 2015.

“Regarding the recommendation that requests for the initiation of misdemeanour proceedings for illegal state border crossing and illegal residence proceedings in Serbia against persons who fled war inflicted countries are not submitted by this Directorate, the Regional Centre towards Hungary was instructed to hold a meeting with the president of the Misdemeanour Court in Subotica in order to adjust a uniform approach towards the above mentioned category of persons in the coming period. The meeting has still not been held.”

3. REGIONAL BORDER POLICE CENTRES

During 2015, the NPM team made six visits to regional border police centres (RBPC) namely: two visits to the RBPC towards Bulgaria⁶, two visits to the RBPC towards Macedonia⁷, the RBPC towards Hungary⁸, and the RBPC towards Croatia⁹.

During the visit to the RBPC towards Hungary, irregularities were noticed in the actions of police officers under the responsibility of MOI. The officers of the RBPC towards Hungary had not received any official notification or instruction on the course of actions, even though it had already previously been announced that Hungary would completely close its border on 15 September 2015, when the incident occurred where Hungarian police officers applied excessive force to prevent illegal entry of several hundreds of refugees to the Hungarian territory. The following recommendation was sent:

- **“... the attitude of the NPM is that the Ministry of Interior should act proactively and direct the actions of organisational units, delivering to them all relevant data and necessary instructions for action prior to the creation of crisis situations when certainty exists that they will occur.”**

The Ministry of Interior responded to this recommendation in the following manner¹⁰:

“In accordance with the current situation, there is a daily horizontal and vertical briefing and reporting on all security interesting occurrences and events to the competent organisational units of this Directorate on regional and local levels, instructions are delivered directly as well as appropriate directions for actions in particular cases.

For the purpose of further standardisation of the police officers practice and actions, the Border Police Directorate shall undertake systematic control-instructive activities with the stress on the application of legal and sublegal acts.”

4. RECEPTION CENTRE FOR FOREIGNERS PADINSKA SKELA

The NPM team visited the Reception Centre for Foreigners in Padinska Skela on 13 August. Four recommendations were sent to the Ministry of Interior on that occasion.

During the visit, the interviewed officials underlined that the persons waiting to be forcibly removed are often highly upset and in difficult mental state, which is why the NPM sent the following recommendation to the Ministry of Interior:

- **“... the NPM is of the opinion that the Ministry of Interior should consider the possibly of employing a professional who would provide psychological support to persons awaiting deportation in the coming period.”**

The Ministry of Interior responded to this recommendation in the following manner¹¹:

⁵ Response of the Ministry of Interior, 03/10 no. 07-4195/15-1, from 10 November 2015.

⁶ The visits were made on 10 June 2015 and 16 October 2015.

⁷ The visits were made on 4 June 2015 and 10 September 2015.

⁸ The visit was made on 18 September 2015.

⁹ The visit was made on 25 September 2015.

¹⁰ Response of the Ministry of Interior, 03/10 no. 07-4195/15-1, from 10 November 2015.

“In regard to your recommendation that the Ministry of Interior should consider the possibility of employing a professional who would provide psychological support to persons awaiting deportation in the coming period, we hereby inform you that we are taking action in line with the abovementioned recommendation. Qualified persons of this Ministry employed in the Department for Health and Psychological Prevention provide psychological support to persons awaiting deportation by examining persons, who are being forcibly removed from Serbia, evaluating their capability for this action, suggesting measures and in certain cases escorting persons to the handover to foreign border authorities. Furthermore, persons being deported are under daily surveillance of the doctors employed at the Correction Facility Padinska Skela, who are especially trained for providing medical and psychological aid to detained persons.”

During the tour of the Reception Centre it was observed that the hygiene of the rooms, bathrooms and sanitary facilities used for the accommodation of male persons is not satisfactory, wherefore the following recommendation was sent:

- **“The Reception Centre for Foreigners shall improve the hygiene of rooms, sanitary facilities and bathrooms used in the annex of the Reception Centre, allocated for the accommodation of male persons.”**

The Ministry of Interior responded to this recommendation in the following manner¹²:

“In regard to the recommendation that the Reception Centre for Foreigners enhances the hygiene of rooms, sanitary facilities and bathrooms allocated for the accommodation of male persons, we hereby inform you that we have initiated the procedure of repairment and renovation of sanitary facilities as well as the hygienic painting of rooms for the accommodation of persons through the Department for Construction and Maintenance of Objects and Equipment, which will be completed in the coming period according to the financial possibilities.”

Since the beginning of 2015 until the visit to the Reception Centre for Foreigners, there was only one occurrence of the use of means of coercion, namely tying of a person the employs of the Reception Centre were escorting to the border crossing towards Bulgaria for forceful removal. At the inspection of the Report on the use of means of coercion, it was established that it does not contain all necessary data and it cannot be determined with certainty whether the reports are made after each use of means of coercion. For these reasons, the NPM sent the following recommendation:

- **“Police officers of the Reception Centre for Foreigners shall compose full reports on the use of means of coercion after each use of these means, and regular records shall be kept of it.”**

The Ministry of Interior responded to this recommendation in the following manner¹³:

“In regard to the recommendation that police officers of the Reception Centre for Foreigners shall compose full reports on the use of means of coercion after each time they are used, and keep regular records it, we hereby inform you that in the present period it has been acted fully according to the aforementioned recommendation in line with the provisions of the Police Act (“Official Gazette of RS” no.101/2005,63/2009 and Decision of CC no. 92/2011), the Rules and Regulations on Technical Markings and Ways of Using Means of Coercion (“Official Gazette of RS” no.19/07, 112/08 and 115/14) and Compulsory Instructions on the Manner of Reporting and Estimation of the Justification and Regularity of Using the Means of Coercion. Police officers submit a Report on each use of means of coercion within the assigned deadline and on an assigned form, a direct supervisor and the supervisor of the organisational unit estimate the adequacy of the use of these means, and the data on the use and estimation of the adequacy of the use are entered into the Informational system of the MOI of Serbia. As per the particular case you refer to in the report, the police

¹¹ Response of the Ministry of Interior no. 26-4946/15, from 21 September 2015.

¹² Ibid.

¹³ Ibid.

officers of the Reception Centre for Foreigners fully complied with the stipulated procedure, the use of means of coercion was estimated as adequate and we can deliver further detailed data and documentation upon your request."

One female Russian citizen was accommodated at the Reception Centre for Foreigners, who had previously undertaken the security measure of compulsory psychiatric treatment and safekeeping at a medical institution. Due to psychic disorders and suicidal inclinations, the Reception Centre for Foreigners employees had to submit her to the Clinic "Dr. Laza Lazarević" several times for the provision of competent medical aid. The Reception Centre employees are not adequately trained nor do they have necessary qualifications for working with persons with psychic disorders, wherefore the NPM team sent the following recommendation:

- **"... the NPM is of the opinion that hereafter persons with severe medical conditions and psychic disorders should not be accommodated at the Reception Centre, that is, the legal possibility to provide these persons different, adequate accommodation should be used."**

The Ministry of Interior responded in the following manner¹⁴:

"In reference to the recommendation that hereafter persons with severe medical conditions and psychic disorders should not be accommodated at the Reception Centre, that is, the legal possibility to provide these persons different, adequate accommodation should be used, we hereby inform you that in the previous period we took into account the aforementioned and that the said persons were accommodated at the Reception Centre for Foreigners exclusively following completed medical examinations by the suitable specialist doctors and their estimate that these persons should not be hospitalised, rather that the treatment should be performed out of the medical institution and that they were capable for accommodation and residing at the Reception Centre with treatment at a medical clinic. At the same time, we inform you that there does not exist a legal possibility of accommodation of said persons at a Special Prison Hospital."

5. NIKOLA TESLA AIRPORT IN BELGRADE

In 2015 the NPM team¹⁵ visited Nikola Tesla Airport four times, and sent three recommendations.

During the visit, it was established that the officials did not keep records on persons accommodated in the room at the airport, wherefore the following recommendation was sent:

- **"It is the NPM's opinion that the BPO (Border Police Office) Belgrade at Nikola Tesla Airport and Nikola Tesla Airport should take measures to establish and keep records on persons who are accommodated in the room at the Airport, and all important events, that is facts relevant for their residing in that room."**

Response¹⁶ of the Ministry of Interior:

"... we hereby inform you that in the coming period the Border Police Department of MOI of the Republic of Serbia will take measures within its jurisdiction and initiate that data processing of persons accommodated in the rooms at the airport is provided in the Bill on the Recording and Data Processing in the Field of Internal Affairs. Until the realisation of the activity, the Border Police Department, Border Police Office Belgrade shall consider the possibility of using data from the records kept by Nikola Tesla Airport. "

Furthermore, during the visit it was determined that Police Border Office Belgrade at Nikola Tesla Airport does not perform the dactyloscopy nor take photographs of persons who express intention to seek asylum, and the following recommendation was sent:

¹⁴ Ibid.

¹⁵ The visits were made on 20 May, 29 June, 15 July and 7 August 2015.

¹⁶Response of the Ministry of Interior no. 3062/15-39 from 13 October 2015 .

- **“The Police Border Office Belgrade at the Nikola Tesla Airport shall perform the dactyloscopy and take photographs of all foreigners who express intention to seek asylum and shall enter the data in appropriate records.”**

Response¹⁷ of the Ministry of Interior:

“...we hereby inform you that during the month of September 2015 equipment was installed and the network system “Papillion System” was set-up for electronic scanning of finger prints and photographing faces at the official facilities of the Border Police Office Belgrade at Nikola Tesla Airport. Furthermore, the police officials of the Crime Investigation Police Department of MOI, NCTC (National Crime Technology Centre) trained the police officials of the Border Police Station in Belgrade for operating the abovementioned system. Accordingly, on 6 June 2015, the dactyloscopy, photography and recording procedures of persons who express intention to seek asylum in Serbia, officially began at the Police Border Station Belgrade at Nikola Tesla Airport.”

It was determined during the visit that the premises for accommodation of persons who do not fulfil entry conditions at Nikola Tesla Airport is not adequate for a multi-day residence and there is no possibility for them to spend time in the fresh air, hence the following recommendation was sent:

- **“Nikola Tesla Airport shall provide adequate premises for the accommodation of persons who do not fulfil entry conditions, in accordance with the current standards and appropriate space for physical recreation in the open air.”**

Response¹⁸ of the Ministry of Interior:

“... we hereby inform you that the police officials of the Border Police Department, of the Border Police Station in Belgrade have established contact with the relevant authorities from Belgrade Nikola Tesla Airport with the aim of construction of the abovementioned facility. On that occasion Belgrade Nikola Tesla Airport officials presented that the technical documentation for the annex of the Finger Pier C, at Belgrade Nikola Tesla Airport, within which the construction of the abovementioned premises is also planned in accordance with the current rules and regulations and recommended standards, and the “Concept Design for the Pier C Annex” at Belgrade Nikola Tesla Airport was delivered to the Border Police Department for approval and that the Border Police Department of MOI made assent for the said project on 1 October 2015, particularly taken into consideration recommendations of the Protector of Citizens which refer to the construction of the abovementioned premises and to follow the course of its construction.”

6. RECEPTION CENTRES

A great number of the Middle East refugees who transited through Serbia in 2015, caused the need for reception centres for accommodation of refugees to be established. In 2015, eight reception centres were visited. The Reception Centre in Preševo was visited on 9 September, 24 November and 7 December. The Reception Centre in Kanjiža was visited on 17 September, the Reception Centre in Principovac on 25 September and 31 October, the Reception Centre in Sombor on 7 October and 1 November, the Reception Centre in Dimitrovgrad on 16 October, the Camp Site in Miratovac on 9 September, 24 November and 7 December, the Reception Centre Adaševac on 31 October and the Reception Centre in Šid on 9 December.

During these visits, the NPM team determined certain irregularities in the performance of public authorities, and a possibility for the enhancement of the refugees accommodated at the reception centres, which is why 14 recommendations were forwarded to the Commiserate for Refugees and Migrations, the Ministry of Interior and the Ministry of Labour, Veteran and Social Affairs.

¹⁷ Ibid.

¹⁸ Ibid.

6.1. Reception centre in Preševo and Camp Site in Miratovac

During the visit to the Reception Centre in Preševo and Camp Site in Miratovac on 9 and 10 September, the NPM team issued the following opinions and recommendations:

- **“The NPM is of the opinion that it is necessary for the Working Group for the Solution of the Problem of Mixed Migration Flows, in cooperation with the Ministry of Interior, the Ministry of Labour, Veteran and Social Affairs and the Commiserate for Refugees and Migrations to enhance the coordination of activities at the Reception Centre and appoint a person to manage and be responsible for the complete work of the Reception Centre.”**

Response¹⁹ of the Commiserate for Refugees and Migrations:

“Slobodan Savović manages operations of the Reception-Transit Centre in Preševo and the employees of CRM (Commiserate for Refugees and Migrations). The coordination of these authorities is entrusted to Milenko Nikić, an employee of the Ministry of Labour, Veteran and Social Affairs. The matter of coordination and managing of the Reception-Transit Centre in Preševo is rather complex, particularly due to the fact that the representatives of various authorities and involved in different segments of the centre’s activities, while the number of migrants registered daily is very large. CRM invests continual efforts with the aim to enhance the existing system of coordination and management.”

- **“The Ministry of Interior officials shall take photographs of all underage persons when issuing the certificates of the expressed intention to seek asylum.**
- **“When issuing the certificates for seeking asylum to the underage unaccompanied persons, the Ministry of Interior officials shall enter first and last name of the persons accompanying them and the number of the certificates issued to these persons in the abovementioned certificates.”**

Response²⁰ of the Ministry of Interior:

“Taking photographs of all underage persons when issuing the certificates of the expressed intention to seek asylum cannot currently be done with the available technical capacities of the Reception Centre in Preševo.” The only available system for criminalistics technical recording is AFIS (Automated Fingerprint Identification System), where photographs are inserted after dactyloscopy. In order to enforce this recommendation, the Ministry of Interior shall attempt to provide technical capacities and additional number of practitioners.

There are technical possibilities for the realisation of the part of the recommendation that refers to the entry of data of persons accompanying underage persons and the numbers of certificates issued to these persons. Our remark is that the introduction of such procedure would significantly prolong the time of processing persons (Processing of one family with five children would last 20 minutes the least), so that with the current number of appointed police officials the number of issued certificates could not exceed 3000 during 24 hours.”

- **“The Ministry of Interior officials shall provide the personnel and technical capacities necessary for the practice of an efficient procedure of issuing certificates of the expressed intention to seek asylum in Serbia.”**

Response²¹ of the Ministry of Interior:

¹⁹ Response of the Commiserate for Refugees and Migrations no. 019-4018/1 from 20 October 2015.

²⁰ Response of the Ministry of Interior no. 3062/15-48 from 12 November 2015.

²¹ Ibid.

"... we hereby inform you that this Ministry shall make maximum effort to provide personnel given the fact that appointing the minimum of 35 police officials per shift is necessary for daily issuing of 10000 certificates."

- **"The notification for the possibility to submit corruption reports in English, Arabic and Farsi shall be visibly displayed at the Reception Centre."**

Response²² of the Commiserate for Refugees and Migrations:

"The sign informing migrants of the possibility to submit corruption reports has been translated into English and Arabic and displayed visibly at the centre."

Response²³ of the Ministry of Interior:

"In view of the recommendation that the notification for the possibility to submit corruption reports in English, Arabic and Farsi should be visibly displayed, we hereby inform you that IOM, in cooperation with the Ministry of Interior and the Commiserate for Refugees and Migrations and the Ministry of Labour, Veteran and Social Affairs, shall publish information for asylum seeking which will be available to persons which express their intention to seek asylum in Serbia. The information shall be translated to languages spoken in the areas where the largest number of asylum seekers come from, as well as English. Along with the notification on the rights of asylum seekers, the telephone number where they can report corruption cases shall be included in the information as well."

- **"The house rules translated into English, Arabic and Farsi shall be visibly displayed at the Centre."**

Response²⁴ of the Commiserate for Refugees and Migrations:

"House rules are clearly displayed on the billboard size 5 x 2.5 meters which is placed in the yard in front of the counter-diversion door." It has been translated into English, French, Arabic and Farsi."

- **"The Commiserate for Refugees and Migration shall take appropriate steps, in cooperation with the Preševo Municipality, so as to provide cleaning and maintenance of public surfaces in the vicinity of the Reception Centre, setting up overhead covers in front of the entrance of the Reception Centre in order for refugees waiting to enter to be able to take shelter in case of rain or snow, and installing portable toilets."**

Response²⁵ of the Commiserate for Refugees and Migrations:

"Since the Centre in Preševo started operating, the CRM has been paying for the services of the Moravica Public Communal Company (PCC), which removes garbage from the Centre on a daily basis. Furthermore, the house rules inform migrants that they are to dispose of garbage appropriately. In order to enhance the capacities of this company UNOPS has to date donated ten metal garbage disposals for PET garbage, ten portable toilets set up in front of the Centre and the eight cubic meters trucks for collecting garbage are being purchased and shall be donated these days to PCC Moravica whereby the capacity of this company will be greatly improved and services will be improved."

The CRM shall undertake all measures so that overhead covers are installed in front of the entrance to the Reception-Transit Centre so that migrants could find shelter from rain and snow. In terms of the enhancement of conditions while migrants are waiting to be registered, three large tents with firm foundation,

²² Response of the Commiserate for Refugees and Migrations no. 019-4018/1 from 20 October 2015.

²³ Response of the Ministry of Interior no. 3062/15-48 from 12 November 2015.

²⁴ Response of the Commiserate for Refugees and Migrations no. 019-4018/1 from 20 October 2015.

²⁵ Ibid.

dimensions 24x10 meters have been set up in the yard, whereby it is provided that 300 persons can find shelter from severe weather conditions while they are waiting to be registered."

- **"The Commiserate for Refugees and Migrations shall provide appropriate premises for accommodation of persons with disabilities."**

Response²⁶ of the Commiserate for Refugees and Migrations:

"The room which was urgently adapted in the existing building with the aim to provide accommodation for women and children is located on the second floor and during the period of adaptation it was not possible to enable access to disabled persons, i.e. the technical possibilities for setting up a ramp do not exist. However, the Danish Refugee Council is beginning with the adaptation of premises for accommodation of migrants in the ground floor area and all measures will be taken to enable access to the disabled persons in this space, that is, the ramp set-up is planned."

- **"The Ministry for Labour, Veteran and Social Affairs shall undertake measures for CSR representatives appointed at the Reception Centre in Preševo to undergo appropriate training on treating unaccompanied underage foreign persons."**

Following the visit on 24 November 2015, with the aim to review acting upon recommendations, the NPM has learnt, in conversation with a representative of CSR Preševo, that representatives of CSR Preševo had undergone training on treating unaccompanied underage foreign persons.

- **"The Ministry of Labour, Veteran and Social Affairs shall undertake measures in order for appropriate procedures and development of mechanism for a more efficient identification of unaccompanied underage persons to be established, as well as their particularly sensitive categories of persons who need additional assistance and care."**

From the response²⁷ of the Ministry to the recommendation directed at CSR Pirot and CSR Dimitrovgrad, response was received for this recommendation as well:

"... the Ministry is already working on the construction of a special instruction which will contain specific indicators for determination of the presence of unaccompanied children, in which cases an intervention of the guardianship bodies is necessary for protection of their personality, right and interest."

- **"The Commiserate for Refugees and Migrations shall provide a special office at the Reception Centre in Preševo for performing uninterrupted and confidential conversation of CSR officials with the users."**

Response²⁸ of the Commiserate for Refugees and Migrations:

"CRM is bringing to a close the renovation process of the former 'Administration building' and it has been planned that one of the rooms is used as a special office within the Reception-Transit Centre for performing uninterrupted and confidential conversation of the officials of CSR with the users."

- **"The Ministry of Interior and the Ministry of Labour, Veteran and Social Affairs shall enable access to the Camp Site in Miratovac to vehicles which transport refugees free of charge from the Camp Site to the Reception Centre in Preševo."**

Response²⁹ of the Ministry of Interior:

²⁶ Ibid.

²⁷ Response of the Ministry of Labor, Veteran and Social Affairs no. 07-00-02098/2015-14 from 10 November 2015 .

²⁸ Response of the Commiserate for Refugees and Migrations no. 019-4018/1 from 20 October 2015.

²⁹ Response of the Ministry of Interior no. 3062/15-48 from 12 November 2015.

“In view of the recommendation to enable access to the Camp Site in Miratovac to vehicles which transport refugees free of charge from the Camp Site to the Reception Centre, we hereby inform you that the Camp Site in Miratovac field is reached by the local country road in there are no obstacles for vehicles. The Ministry of Interior did not disable access to vehicles which transport refugees free of charge in the previous period either.”

6.2. Reception Centre Principovac

Following the visit to the Reception Centre Principovac, the NPM sent the following recommendations:

- **“The Commiserate for Refugees and Migrations shall take measures to establish and keep records on the number of persons who arrived at the Reception Centre, with the basic data on their age and sex structure.”**

Response³⁰ of the Commiserate for Refugees and Migrations:

“It was stated in your report that during the visit of the NPM team to the Centre it was noticed that records were not kept on the users who arrive at and leave the Centre so the recommendation was for Commiserate for Refugees and Migrations to take measures to establish and keep records on the number of persons arrived at the Reception-Transit Centre with the basic data on their age and sex structure. Migrants spend short time at this Centre, usually up to two hours, they use the time to take a shower, change clothes, freshen up and take some rest, therefore at such a short period, having in mind the fact that the Centre was opened quickly as an urgent response to the arrival of a great number of migrants to the Croat-Serbian border, the CRM employees were appointed for the duties of primary reception. Following your recommendation, as of 15 October 2015, the CRM started keeping records on the numbers of persons who arrived at the Centre and soon afterwards keeping records on the sex and age structure was established.”

- **“The house rules translated into English, Arabic and Farsi shall be visibly displayed at the Centre.”**

Response³¹ of the Commiserate for Refugees and Migrations:

“In terms of the recommendation that House Rules translated into English, Arabic and Farsi are displayed visibly in the Centre, we hereby inform you that House Rules translated into all three languages have been set up in all rooms for accommodation of migrants in the Centre during mid-October.”

- **“With the aim to enhance the conditions for residence at the Reception Centre, the Commiserate for Refugees and Migrations shall undertake possible measures to enable putting in use the heating system and laundry room operation.”**

Response³² of the Commiserate for Refugees and Migrations:

“The CRM has been continually working on the enhancement of conditions for residence at the Centre, and in regard with your recommendation to undertake possible measures to enable putting in use the heating system and laundry room operation, we hereby inform you of the undertaken measures. The heating system has been completely repaired and is in function. In terms of the laundry room functioning, the existing laundry room is not operable and it is not possible to bring it to use again. However, the CRM has been undertaking all possible measures to provide laundry services for linen in professional laundry rooms in Šid.”

7. ASYLUM CENTRES

³⁰ Response of the Commiserate for Refugees and Migrations no. 019-4331/1 from 18 October 2015.

³¹ Ibid.

³² Ibid.

The NPM team visited asylum centres four times in 2015, with the aim to monitor the treatment of refugees from the war inflicted areas and asylum seekers in Serbia. The visits were made in March 2015 to the Asylum Centre in Sjenica and Asylum Centre in Tutin. The NPM team visited the Asylum Centre in Krnjača and Asylum Centre in Banja Koviljača in August. The NPM team sent six recommendations: four to the Asylum Centre in Banja Koviljača, and two to the Asylum Centre in Krnjača.

7.1. Asylum Centre in Krnjača

During the visit to the Asylum Centre in Krnjača, oversights were noticed that the NPM team pointed at in the report sending two recommendations to the Commiserate for Refugees and Migrations. Right before the arrival of the NPM team at the Centre, a physical fight occurred between a citizen of Iran and a citizen of Sudan in the vicinity of the Centre. The NPM team found the citizen of Iran with head and right hand injuries. Although it was a surface injury of the head, due to abundant bleeding, medical intervention was necessary. Furthermore, the citizen of Iran insisted that police be called. After one hour, during the NPM visit, police officials arrived from the Police branch office in Borča to take depositions from both actors in the event. According to their statements, official notes on collecting notices will be forwarded to the Immigration Office of the Police Department in Belgrade for further action. In addition, the ambulance arrived in the meantime. According to the statement of the citizen of Iran, for a longer period of time there had existed intolerance between him and the person he had confronted. He stated that they had been accommodated in the same room and he could not sleep next to this person as he made phone calls all night long. On the contrary, an employee of the Centre stated that the two of them had been separated two days prior to the NPM visit and they no longer resided in the same rooms. Having in mind the abovementioned, the following recommendation was made:

- **“... the opinion of the NPM is that employees of the Centre should pay special attention in future when accommodating foreigners in the accommodation units of the Centre and to rearrange them in case they find out that relationships between foreigners accommodated in the same unit have been harmed and conflicts may occur.”**

Response³³ of the Commiserate for Refugees and Migrations:

“... physical fight of these two persons occurred outside of the premises of the Asylum Centre Krnjača, and upon their return to the centre, the CRM employees took immediate action, police officials and the ambulance were contacted immediately. On that same day, these persons who shared a room were rearranged in different rooms. We take this occasion to mention that the citizen of Iran had disagreements with the majority of persons accommodated at the Centre continually during his stay, which the CRM managed to handle successfully. Both persons left the centre voluntarily, without notifying the Centre authorities on the day of the physical fight, therefore it was not possible for the Asylum Office to take further measures against these persons.

This incident is an individual case which surprised the Centre employees as well. However, the Centre employees monitor each individual's conduct and take appropriate measures. Special attention is paid if it is established while accommodating foreigners in accommodation units of the Centre that there are harmed relationships and conflicts may occur, and on such occasions these persons are separated and their conduct is closely monitored by the Centre employees, with the aim to prevent any incidents in the Centre and following the house rules.

Employees of the Asylum Centre in Krnjača deliver daily written reports on the numbers and extreme events in the Centre by email. The reports are delivered to the CRM and the employees of the Asylum Office.

³³ Response of the Commiserate for Refugees and Migrations no. 019-3461/1 from 28 October 2015.

The Asylum Office employees were notified on this particular event on 14 August, by authorised persons in the Centre...

- **“The authorised person in the Centre shall inform the Asylum Office on breaking house rules of the Asylum Centre in Krnjača by foreigners accommodated at the Centre, in order for measures to be taken in accordance to Asylum Act.”**

Response³⁴ of the Commiserate for refugees and migrations:

“... system for informing the Asylum Office was established at the beginning of the Centre’s operation, on a daily basis, in a report which contains precise information on the numbers and extreme events. This practice shall be continued and we shall work on its enhancement, especially in a situation when a significant number of house rules are broken by foreigners accommodated in the Centre, and the Asylum Office shall be additionally notified of major incidents with the aim of timely undertaking measures in accordance with the Asylum Act.”

7.2. Asylum Centre in Banja Koviljača

Following the visit to the Asylum Centre in Banja Koviljača, four recommendations were sent.

- **“The Commiserate for Refugees and Migrations and the Asylum Centre in Banja Koviljača shall provide continual presence, i.e. availability of interpreters at the Centre, in order for uninterrupted communication to be possible to be made with the foreigners accommodated there.”**

Response³⁵ of the Commiserate for Refugees and Migrations:

“... we hereby inform you that two persons who received subsidiary protection of the Republic of Serbia have been residing at the Centre constantly since 24 September. These two persons are employed as interpreters for Arabic and Somali languages. The residence of one interpreter in Reception-Transit Centre in Kanjiža was on a one-time basis and urgent for the duration of three weeks, during which time the number of foreigners in Kanjiža was significantly higher in relation to the Asylum Centre in Banja Koviljača. During this period, a new interpreter for the Centre in Kanjiža was appointed, so the interpreter from Banja Koviljača was returned to the Centre in Banja Koviljača and this way the continual presence of interpreters for the Arabic and Somali languages was provided. Additionally, the Asylum Centre in Banja Koviljača is in full-time contact with an additional interpreter for Arabic who lives in the town of Loznica, and can be employed when needed in case of the absence or illness of the full-time interpreter.”

During the visit to the Asylum Centre in Banja Koviljača, the NPM team determined that after hours on workdays and throughout the whole day at weekends, only members of security stay at the Centre, wherefore the following recommendation was sent to the Commiserate for Refugees and Migrations and the Asylum Centre in Banja Koviljača:

- **“The Commiserate for Refugees and Migrations and the Asylum Centre in Banja Koviljača shall provide that Centre officials work in shifts or shall establish their duties, so that they can be continually present and could meet the needs of foreigners accommodated at the Centre.”**

The Commiserate for Refugees and Migrations made the following response:³⁶

“The Asylum Centre in Banja Koviljača operates in such a way that the needs of foreigners accommodated at the Centre can be met continually. Namely, the first shift which organises the process of whole-day activities

³⁴ Ibid.

³⁵ Response of the Commiserate for Refugees and Migrations no. 019-3787/1 from 3 November 2015.

³⁶ Ibid.

is present during the day. In the afternoon and night hours on-call duties have been introduced. The official on duty is obliged to come to the Centre within five minutes of the phone call of the security which is always present there. The security of the building is instructed and empowered to call the ambulance, police and the Centre official on duty immediately upon the established urgent situation. This practice was introduced in accordance with the tendency to reduce the number of persons present at the Centre. Namely, in September 15 asylum seekers resided at the Centre on average, and in October that number was reduced to nine persons on average. In case of a more significant increase in the number of asylum seekers at the Centre, the practice shall be shifted from the on-call duty regime to the presence of the Centre employees in shifts, so the tendency is that in accordance to the needs there is an urgent response to the needs of foreigners currently accommodated at the Centre."

At the moment of the visit, a foreigner with a hindered medical condition was accommodated at the Centre. This person was accommodated in a room on their own and it was obvious they needed help and special care which the Centre employees were not trained for nor did they have appropriate capacities. The Centre officials pointed out that they were not adequately trained to treat this person and that it would be easier primarily for him, but them as well, that different more appropriate accommodation is provided, so the NPM team sent the following recommendation:

- **"The Asylum Centre in Banja Koviljača, in cooperation with the Commiserate for Refugees and Migrations, shall undertake appropriate measures so that the person with hindered medical condition, who is accommodated at the Centre i.e. provided other adequate accommodation and appropriate rehabilitation."**

Response³⁷ of the Commiserate for Refugees and Migrations:

"The person in question is from Bangladesh, born in 1988, and as it was stated in your report the person was in a traffic accident near the town of Leskovac and due to the consequences of the accident was placed in a hospital in Niš. After the medical treatment, the person was discharged from the hospital in Niš and transferred to the Asylum Centre in Banja Koviljača, but still could not move by themselves and the health state required further rehabilitation. The Centre employees provided a wheelchair and crutches upon admission of this person to facilitate their walking. The Medical Centre in Loznica was contacted immediately and the person was directed at the orthopaedic department of the General Hospital, and after that, for rehabilitation, the Special hospital in Loznica. The Centre officials provided daily transport to the authorised institutions and following the course of recovery of this person. The expenses of the treatment and rehabilitation were enabled by the Ministry of Health in accordance to the provisions of Law. Rehabilitation, under the surveillance of the authorised health services, and orthodontist and physiatrist, with the help of the Centre employees lasted for two weeks. Following the recovery, the person feels significantly better, does not use the wheelchair nor the crutches any longer but the tripod and is in noticeably better shape. They go for meals and take care of themselves on their own. The check-ups were scheduled to keep track of the further recovery of this person."

It was noticed during the visit that when female persons accommodated at the Asylum Centre in Banja Koviljača are inspected, at the registration by the Asylum Office officials, the inspection is performed by the officials of the Asylum Centre in Banja Koviljača since there are no female employees working for the Asylum Office in this Centre so the following recommendation was sent:

- **"The Asylum Office shall enable that inspection of female persons accommodated at the Asylum Centre in Banja Koviljača is performed by female police officers, that is they shall undertake measures in order to employ at least one female police officer at the Asylum Centre in Banja Koviljača."**

Response³⁸ of the Ministry of Interior:

³⁷ Ibid.

³⁸The response of the Ministry of Interior, directorate of the police no. 26-4917/15, from 21 September 2015.

“... we hereby inform you that the Rulebook on amendments and additions of the Rulebook on the internal organisation and systematisation of jobs in the Ministry of Interior Pov.01 no. 9681/14-8 from 14 January 2015 in which the Asylum Office was created with 29 job positions, six positions were provided for performing registration of asylum seekers at the asylum centre. Two of these positions have been fulfilled so far.

Keeping in mind the abovementioned and the fact that the outline of the action plan of the Republic of Serbia for chapter 24 within the subheading Asylum in the activity 2.1.2.1. provides that all job positions are fulfilled in the Asylum Office concluding with the first quarter of 2016, the Border Police Department shall take all necessary measures in its jurisdiction in order to implement all your recommendations within the shortest period possible.”

8. DIRECTORATES FOR EXECUTION OF CRIMINAL SANCTIONS

8.1. District Prison in Subotica

The NPM team visited the District Prison in Subotica and on that occasion sent two recommendations.

- **“Subotica DP (District Prison) shall make information regarding the realisation of the rights of foreign citizens in Prison available to them in the language they understand, if they do not understand Serbian or English.”**

The Ministry of Justice responded³⁹ that:

“... the District Prison in Subotica shall comply with this recommendation in future within its material capabilities and possibilities of securing interpreters in accordance with the needs of persons deprived of liberty.”

- **“Subotica DP shall notify the country’s diplomatic-consular missions solely with the agreement of the person admitted for serving prison.”**

Response⁴⁰ of the Ministry of Justice:

“Complying with this recommendation, all state officials of the District Prison in Subotica have been notified of this recommendation, so the diplomatic-consular missions are notified only with the agreement of the persons deprived of liberty.”

8.2. Correctional Institution in Sombor

The NPM team visited the Correctional Institution in Sombor, and sent the following recommendation on that occasion:

- **“The Directorate for Execution of Criminal Sanctions and CI (Correctional Institution) Sombor shall undertake necessary measures and activities so that persons convicted with misdemeanour can be accommodated in a special unit (department), separate from the sentenced persons.”**

8.3. Correctional Institution for Underage Persons in Valjevo

The NPM team visited the Correctional Institute for Underage Persons in Valjevo. In 2015, six irregular migrants convicted with misdemeanour were serving prison in the Institution, all of them

³⁹ Response of the Ministry of Justice no. 021-34-14057/15-05 from 23 November 2015.

⁴⁰ Ibid.

with the residence in Afghanistan. Having an insight in documentation and following the conversation with the Institution representatives, it was determined that there were no irregularities in the treatment of migrants.

9. SOCIAL WORK CENTRES

The NPM team visited social work centres six times in 2015, with the aim to monitor the treatment of underage refugees from war inflicted areas and asylum seekers in Serbia. Visits were made to the centres in: Pirot, Dimirtovgrad, Loznica, Kanjiža, Subotica and Preševo. The NPM team sent three recommendations to the Ministry of Labour, Veteran and Social Affairs.

9.1. Social Work Centre in Loznica

During the visit to the Social Work Centre in Loznica in August 2015, it was determined that the procedure for appointing a guardian for a unaccompanied underage foreign person upon their accommodation in the asylum centre, from the locally authorised SWC is a long procedure, during which time unaccompanied underage foreign persons leave asylum centres arbitrarily. The following recommendation was sent on that occasion:

- **“The Ministry of Labour, Veteran and Social Affairs shall take measures to ensure an efficient procedure to place unaccompanied underage foreign persons under guardianship when they are accommodated in the asylum centre.”**

The Ministry of Labour, Veteran and Social Affairs responded to this recommendation in the following manner⁴¹:

“Ministry of Labour, Veteran and Social Affairs issued an Instruction for the actions of Social Work Centres and Institutions of Social Protection for Accommodation of Users for Providing Protection and Accommodation of Unaccompanied Underage Migrants no. 110-020-00469/2015-14 from 10 July 2015, which was delivered to all Social Work Centres and which contained instructions on actions of the Centres in cases of significant increase of immigration in the Republic of Serbia. The aim of the Instruction was providing timely, whole, unified and legal actions of the Social Work Centres, institutions for accommodations of users which have special organisational units in their organisational structure for temporary accommodation and care of unaccompanied underage migrants and other social protection institutions for accommodation where underage immigrants and immigrants who can be accommodated in the social protection institutions in accordance with the Migration Management Act (“Official Gazette of RS” no. 107/2012).

Through the Instruction, listed institutions were presented with the obligation to provide measures of family legal protection of guardianship and the service of accommodation in accordance with the principle of the protection of the rights of immigrants, respecting to the fullest possible extent the specifics of their needs and interests, in accordance with the abilities of the Republic of Serbia and respecting ratified international agreements and generally accepted rules of international law. Furthermore, the Social Work Centres were given a directive through the Instruction to provide guardianship protection to such underage person, immediately upon the receipt of an oral or written notice by the Ministry of Interior, the Police Directorate, Border Police Department or Commiserate for Refugees and Migrations, that an underage immigrant without protection was found, by appointing a temporary guardian in accordance to Article 132, paragraph 2, item 4 of the Family Law (Serbia “Official Gazette of RS” no. 18/2004, 72/2011 - state law, 6/2015).”

Additionally, during the visit to the Social Work Centre in Loznica, it was determined that the SWC employees who act as guardians, cannot efficiently take care of underage foreigners whom they were appointed guardians due to their regular assignments. Therefore, the following was recommended:

⁴¹Response of the Ministry of Labor, Veteran and Social Affairs no. 551-00-00605/2015-14 from 10 November 2015.

- **“The NPM is of the opinion that the Ministry of Labour, Veteran and Social Affairs should employ a person in SWC Loznica who would carry out only the affairs of guardianship over unaccompanied underage foreigners accommodated at the Asylum Centre in Banja Koviljača.”**

The Ministry of Labour, Veteran and Social Affairs responded to this recommendation in the following manner⁴²:

“In terms of the recommendation of the Protector of Citizens that the Ministry of Labour, Veteran and Social Affairs should employ a person in SWC Loznica who would carry out only the affairs of guardianship over unaccompanied underage foreigners accommodated at the Asylum Centre in Banja Koviljača, we hereby inform you that the Ministry is unable to employ a person for carrying out listed activities due to the Government’s Regulation on the Prohibition of Employment.”

9.2. Social Work Centres in Pirot and Dimitrovgrad

In October 2015, the NPM visited the SWC in Pirot and SWC in Dimitrovgrad, when it was determined that the processes of appointing temporary guardians for unaccompanied underage foreigners were not performed properly, given that foreign citizens were appointed as guardians, although there did not exist a possibility to determine their identity with certainty, nor if there were obstacles to perform guardianship duties in each individual case. With regard to the abovementioned, the following recommendation was sent:

- **“The Ministry of Labour, Veteran and Social Affairs shall amend the Instruction⁴³ by additionally regulating the procedure for determination of personal characteristics and abilities necessary for performing guardianship duties over unaccompanied underage migrants.”**
- **“The Ministry shall provide instructions for the activities of social work centres and institutions of social protection in case that it is not possible to determine if there are obstacles for performing guardianship duties for a person who accepted to be a guardian. “**

The Ministry responded to this recommendation of the NPM⁴⁴ in the following manner:

“.. taking measures of guardianship protection is exclusively necessary when a child is found unaccompanied by a particular adult or group whiting which they have incorporated and where they feel safe, and not for children without parental guardianship. Measures of guardianship protections are not taken over children who are accompanied by an adult, responsible person, who is not a parent or accompanied by a group in which they feel safe, that is, where their safety, health and existential conditions are not endangered and the guardianship organ does not have the obligation to take any measures, rather regarding the best interest of the underage child, they enable the continuation of the movement of the child within the existing conditions. This attitude is in line with internationally accepted conventions and instructions.

“... the Ministry is already working on the construction of a special instruction which will contain specific indicators for determination of the presence of unaccompanied children, in which cases an intervention of the guardianship bodies is necessary for protection of their personality, right and interest.”

In regard with the particular recommendation, the Ministry estimates that it is not possible to regulate procedures stipulated in the Family Law through the Instruction, if they refer to placing under guardianship, choosing and appointing guardians, supervision of the performance of guardians etc. In these cases of taking measures of guardianship protection, the authorised guardianship organ shall comply with all provisions of

⁴²ibid.

⁴³ Instruction for the Actions of Social Work Centres and Institutions of Social Protection for Accommodation of Users for Providing Protection and Accommodation of Unaccompanied Underage Migrants no. 110-00-00469/2015-14 from 10 July 2015.

⁴⁴Response of the Ministry of Labor, Veteran and Social Affairs no. 07-00-02098/2015-14 from 10 November 2015.

the Family Law, which means that no person for whom the process of determining their suitability to be a guardian cannot be performed within the meaning of provisions in Articles 126, 126 and 128 of the Family Law, can be placed on duty.

Given that in the situation of massive refugees on the whole the relevant procedure cannot be undertaken, the Family Law must be applied, namely provision 131 placing protégés under immediate guardianship, which enables the guardianship organ to react without delay. Placement under immediate guardianship does not require the enforcement of legally provided procedures of determination of suitability of a different individual for performing guardianship duties, given that the guardianship duties are performed immediately by the guardianship organ."

10. CENTRES FOR ACCOMMODATION OF UNDERAGE PERSONS

The NPM team visited the Centre for Accommodation of Underage Foreigners - Institute for Youth Education ⁴⁵ in Niš and Centre for Accommodation of Underage Foreign Persons Vasa Stajić in Belgrade⁴⁶. The NPM team did not find irregularities in the performance of these bodies.

11. INFORMAL PLACES OF GATHERING OF REFUGEES/MIGRANTS - BRICKYARD IN SUBOTICA

Within the visit to the Police Directorate in Subotica on 18 September 2015 the NPM team also visited the Old Brickyard, the place of informal gathering of refugees. The Old Brickyard is occasionally visited by the police officers of PD Subotica, while the Red Cross, communal police and other NGOs which distribute food, water and hygiene packets are also present.

⁴⁵ The visit was made on 9 July 2015.

⁴⁶ The visit was made on 6 July 2015.

Report	Official Note	Announced Visit	Unannounced Visit	Name	Date	Number of Visits	Police Directorate/ Police Station / MOI	Asylum Centre	Reception Centre	Reception Centre for Foreigners	Regional Border Police Centre	Social Work Centre	Correctional Institution Accommodation Centre for Underage Foreigners	Airport
X		X		Police Directorate in Kikinda	26/27.02	1	1							
X				number of recommendations			0							
X		X		Police Directorate in Kraljevo	23,30.3	1	1							
X				number of recommendations			0							
X		X		Police Directorate in Čačak	26/27.3	1	1							
X				number of recommendations			0							
X		X		Police Directorate in Kragujevac	20/21.4	1	1							
X				number of recommendations			0							
X		X		Asylum Centre Sjenica	31.3	1		1						
X				number of recommendations			0							
X		X		Asylum Centre Tutin	30.3	1		1						
X				number of recommendations			0							
	X	X		Nikola Tesla Airport	20.5	1								1
X				number of recommendations										
X		X		Police Directorate in Pirot	9.6	1	1							
X				number of recommendations			0							
X		X		Police Directorate in Prokuplje	10.6	1	1							
X				number of recommendations			0							
X	X(KPZ)	X		Police Directorate in Valjevo and Correctional Institution for Underage Persons in Valjevo	12.6	2	1						1	
X				number of recommendations			0							0
X		X		Regional Border Police Centre towards	10.6	1					1			

			ic a											
X				number of recommendations			1	4				2		
X		X	M ir at o va c	Reception Centre in Preševo, Camp Site in Miratovac, Police Stations in Preševo and Bujanovac, Regional Border Police Centre towards Macedonia, Social Work Centre in Preševo	9/10.9	5	1		2		1	1		
X				number of recommendations			0		11		0	0		
X		X		Reception Centre in Kanjiža	17.9	1			1					
X				number of recommendations					0					
X		X		Subotica District Prison	18.9	1							1	
X				number of recommendations									2	
X		X		Regional Border Police Centre towards Hungary, PD in Subotica, PS in Kanjiža, Centres for Social Work in Kanjiža and Subotica, Old Brickyard in Subotica	17/18.9	6	2				1	2		
X				number of recommendations			3				0	0		
X		X		Reception Centre Principovac	25.9	1			1					
X				number of recommendations					3					
X		X		Regional Border Police Centre towards Croatia	25.9	1					1			
X				number of recommendations							0			
X		X		Correctional Institution in Sombor	7.10	1							1	
X				number of recommendations									1	
X		X		Police Directorate in Sombor	7.10	1	1							
X				number of recommendations			0							
X		X		Reception Centre Sombor	7.10	1			1					
X				number of recommendations					0					
X		X		Regional Border Police Centre towards Bulgaria, Border Police Stations for Protection of State Border Pirot	15/16.10	5	1		1		1	2		

				(Reception Centre in Dimitrovgrad), PD Pilot, Social Work Centre in Pilot, Social Work Centre in Dimitrovgrad														
X				number of recommendations			0		0		0	1						
	X		X	Reception Centres Principovac, Adaševci and Sombor	30.10/1.11	3			3									
				number of recommendations					0									
X		X		Police Administration Zaječar	4-6.11	1	1											
X				number of recommendations			0											
X		X		Police Directorate in Bor	4/5.11	1	1											
X				number of recommendations			0											
			M ir at o va c	Reception Centre Miratovac and Reception Centre Preševo - internal report	24.11	2			2									
X		X		number of recommendations					0									
X		X		Reception Centre in Prševo, Camp Site in Miratovac	7.12	2			2									
				number of recommendations														
		X		Reception Centre in Šid	9.12	1			1									
				number of recommendations														
Total number of visits					59		18	4	14	1	6	6	3	2	4			
Total number of recommendations					36		4	5	14	4	0	3	3	0	3			