INCLUDED BUT INVISIBLE:

Employment Policies, Practices and Outcomes for Young Persons with Disabilities in Albania, North Macedonia and Serbia

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Included but Invisible: Employment Policies, Practices and Outcomes for Young Persons with Disabilities in Albania, North Macedonia and Serbia

This report is prepared by the Employability Team of the Regional Youth Leadership Mobility Programme 2025/2026 (RYLMP).

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The views in this document are solely of the authors and do not necessarily reflect the views of the project cohort nor the Open Society Foundation Western Balkans (OSFWB).

List of Abbreviations

ALMMs	Active Labour Market Measures
CSOs	Civil Society Organisations
HR	Human Resources
IEP	Individual Employment Plan
NAES	National Agency for Employment and Skills
NEET	Not in Employment, Education, or Training
NES	National Employment Service
NGOs	Non-Governmental Organisations
PES	Public Employment Services
RNM	Republic of North Macedonia
YPWD	Young people with disabilities
OPDs	Organizations of Persons with Disabilities
EU-SILC	European Union statistics on income and living conditions

EXECUTIVE SUMMARY

- This policy paper examines the employability of young persons with disabilities in Albania, North Macedonia and Serbia, focusing on whether existing employment legislation, strategies, active labour market measures and institutional practices effectively respond to the specific needs of this group.
- Despite the formal inclusion of young persons with disabilities in active labour market measures in Albania, North Macedonia and Serbia, there is a lack of comparative and evidence-based research assessing their real effectiveness, implementation practices, and employment outcomes.
- The analysis combines desk research, online surveys and structured interviews with institutions, CSOs, experts and young persons with disabilities. Although the survey sample is not representative, it provides indicative evidence of key tendencies, barriers and perceptions.

Key secondary research findings

- Across all three countries, young people and persons with disabilities are formally recognised, but young persons with disabilities are rarely treated as a distinct intersectional group. This limits the development of targeted measures, indicators, budgets and monitoring systems.
- This gap appears differently across countries: in Albania, access to measures is often more formal than practical, in North Macedonia, disability-focused support is not systematically age-sensitive and in Serbia, the framework is more detailed, but young persons with disabilities remain included mainly under broader categories.

Key primary research findings

Recognition and visibility of young persons with disabilities as a distinct group

- The primary research confirms the finding from the secondary research that young persons with disabilities are formally included in employment and youth-related frameworks, but are not sufficiently visible as a distinct group in practice.
- Across the three countries, institutions generally refer to existing laws, strategies and programmes that cover either young people or persons with disabilities. However, CSOs and young persons with disabilities emphasize that this approach does not

adequately address the specific barriers faced by young people who are also persons with disabilities.

Awareness and access to employment services and active labour market measures

- Access to employment services and active labour market measures is formally available in all three countries, but practical access remains uneven. Survey findings show that many respondents are not registered with Employment Agencies, especially in North Macedonia, where 64% reported being unregistered, while Albania and Serbia show a more balanced distribution.
- Interviews further suggest that formal availability does not always translate into real access. Young persons with disabilities often rely on CSOs, families, schools, friends or individual initiative for information, rather than on proactive institutional outreach.

Transition from education to employment

- Transition from education to employment remains insufficiently structured in all three countries. While internships, training, vocational rehabilitation and employment support measures exist, none of the three countries has a fully developed transition pathway specifically designed for YPWD.
- Country findings show that in Albania support often depends on families, individual initiative or CSOs, in North Macedonia, the main gaps are career counselling and practical work opportunities, while in Serbia, access to adequate guidance often depends on individual advisers, local practice and available programmes.

Employment outcomes and job sustainability

- Survey findings suggest that participation in employment programmes does not consistently translate into employment: no employment outcome was reported by 59% of participants in Serbia, 35% in North Macedonia, and, depending on the calculation used, between 28.6% and 50% in Albania.
- Interviews with CSOs and young persons with disabilities indicate that employment outcomes are often short-term, insufficiently monitored or dependent on temporary support measures.

Main barriers to employment

- The main barriers identified across the three countries include employer prejudice, lack of adapted support, limited information, lack of work experience, inaccessible workplaces, insufficient career guidance and mismatch between education and labour market needs.
- Institutional and CSO interviews show that these barriers are not isolated, but interconnected: weak outreach limits access to measures, insufficient counselling affects career choices, inaccessible procedures reduce participation, and employer prejudice affects recruitment and retention.

Discrimination, equal treatment and rights awareness

- Discrimination during job applications remains a significant concern in all three countries. Survey findings show that disability, either alone or combined with age, is frequently reported as a basis for discrimination.
- Interviews suggest that discrimination is not always experienced only as direct refusal. It may also appear through inaccessible recruitment processes, lack of reasonable accommodation, unsuitable job offers, limited information about rights and weak institutional response.

Employer engagement, reasonable accommodation and workplace adaptation

- Reasonable accommodation is still not systematically understood or applied. Survey findings show that only a small share of respondents in all three countries reported that employers usually provide appropriate workplace accommodations.
- Interviews confirm that accommodation should not be understood only as physical accessibility, but also as accessible communication, adapted procedures, assistive support, mentoring, workplace adaptation and support after employment

Data, monitoring and institutional learning

- Administrative data on youth, disability and employment exist in all three countries, but age-and-disability cross-disaggregated data are not systematically published or used for policy design.
- The absence of consistent cross-disaggregated data combining age and disability data limits the ability of institutions to design targeted measures, monitor access, evaluate outcomes and assess whether programmes lead to sustainable employment.

Institutional coordination and role of CSOs

- CSOs play an important gap-filling role in all three countries. They often provide outreach, information, rights navigation, application support, employer mediation, psychosocial support and informal job coaching. However, this role is often project-based rather than systematically integrated into formal service delivery.
- Institutional coordination remains fragmented, especially between employment agencies, educational institutions, social protection, disability assessment bodies, equality bodies, employers and CSOs.

Common recommendations for Albania, North Macedonia and Serbia

- Recognise young persons with disabilities as a distinct target group.
- Develop targeted employment measures that respond to both age-related and disability-related needs.
- Improve outreach and accessible information.
- Make employment agencies more proactive and accessible.
- Strengthen transition-to-work support.
- Expand career counselling, vocational orientation, internships, practical training, supported employment and job coaching.
- Link training and employment programmes more clearly to real job opportunities.
- Improve the quality and sustainability of employment outcomes.
- Strengthen employer engagement.
- Ensure reasonable accommodation in employment programmes and workplaces.
- Strengthen anti-discrimination enforcement and rights protection.
- Improve data collection, linking and publication.
- Evaluate active labour market measures based on impact, not only participation.
- Formalise cooperation between institutions and CSOs.
- Provide sustainable support for CSOs and organisations of persons with disabilities.

INTRODUCTION

Across Albania, North Macedonia, and Serbia, the legal, strategic, and institutional frameworks formally recognize youth and persons with disabilities as protected and supported groups within employment policy. However, in none of the three countries are young persons with disabilities codified as a distinct intersectional category within employment legislation or operational policy design. Strategic documents address youth and disability in parallel tracks, without establishing specific objectives, measurable indicators, or tailored transition pathways for their intersection. Active labour market measures are available to both groups, yet disability-focused measures rarely differentiate by age, while youth-focused measures seldom incorporate structured accommodation mechanisms.

Monitoring systems remain largely output-oriented, emphasizing participation and number of beneficiaries rather than long-term employment sustainability, job quality, or transition outcomes. Cross-disaggregated data combining age and disability are not systematically published, and longitudinal tracking mechanisms are absent or fragmented across institutional databases. While institutional responsibilities are formally defined, implementation depends heavily on administrative capacity, inter-sectoral coordination, and, in some contexts, project-based support. Collectively, these findings reveal a structural policy gap: young persons with disabilities are formally included but not operationally visible as a distinct group within employment systems, limiting evidence-based evaluation of their labour market inclusion and justifying the need for primary empirical research.

1. SECONDARY RESEARCH

1.1. POLICY AND LEGAL FRAMEWORK

1.1.1. Definition of Young Persons with Disabilities in Employment-Related Legislation

Across Albania, North Macedonia, and Serbia, youth and persons with disabilities are legally defined within separate legislative instruments. However, in all three systems, young persons with disabilities are not formally recognized as a distinct legal category within employment-related legislation, nor are they codified as a specific high-risk group facing intersectional vulnerability.

In **Albania**, "young people" are defined under the Youth Law (Law No. 75/2019, Art. 3(f)) as individuals aged 15–29.[1] Persons with disabilities are defined by Law No. 93/2014 on inclusion and accessibility (Art. 3(9)) as individuals with long-term physical, mental, intellectual, or sensory impairments which, in interaction with various barriers, including environmental and attitudinal barriers, hinder their effective participation in society.[2] Employment-related provisions are grounded in Law No. 15/2019 on employment promotion, which identifies special groups including young people under 29 who are not in employment, education, or training (Art. 3(4)(h)) and persons with disabilities (Art. 3(4)(c)). The law also establishes the Social Employment Fund to support employment-related measures for persons with disabilities (Art. 21).[3] While youth and persons with disabilities are explicitly targeted as separate categories, young persons with disabilities are not recognized as a distinct legal group. This results in the absence of a unified definition and limits the recognition of potential double discrimination.

A structurally similar situation exists in **North Macedonia**. Young persons are defined under the Law on Youth ("Official Gazette of RNM" No. 113/2023, Article 3) as individuals aged 15–29. Persons with disabilities are defined under the Law on Employment of Persons

[1] Law No. 75/2019 "Për Rininë", Art. 3(f): https://www.observator.org.al/wp-content/uploads/2020/02/ALB-Youth-law-No.-75-2019-English.pdf

[2] Law No. 93/2014 "Për përfshirjen dhe aksesueshmërinë e personave me aftësi të kufizuara", Art. 3(9): https://platforma-pak.al/wp-content/uploads/2019/03/1.-ligj_nr_93_dt_24_7_2014-converted.pdf

[3] Law No. 15/2019 "Për nxitjen e punësimit", Art. 21: https://akpa.gov.al/wp-content/uploads/2021/05/ligj-nr-15-dt-13.3.2019_nxitja-e-punesimit.pdf

with Disabilities[4] as individuals with physical, sensory, intellectual, or other impairments limiting effective participation in employment. The law provides employer incentives, workplace adaptation support, and vocational training opportunities but does not create a separate category for young persons with disabilities. Anti-discrimination provisions, including those in the Law on Prevention and Protection against Discrimination[5], protect persons with disabilities in employment but do not explicitly recognize young persons with disabilities as a distinct intersectional group.

In **Serbia**, young people are defined under the Youth Law as individuals aged 15–30.[6][7]The Youth Law refers to young people with disabilities under the principle of youth responsibility and solidarity, emphasizing equal participation in social life.[8] Persons with disabilities are defined under multiple legislative acts. The Law on the Prevention of Discrimination against Persons with Disabilities defines disability in relation to barriers limiting participation. The Law on Professional Rehabilitation and Employment of Persons with Disabilities defines disability in relation to permanent impairments affecting work capacity and labor market access.[9] The Labor Law provides special protection for employees under 18 and for employees with disabilities and includes a dedicated section addressing employees with disabilities.[10][11] Despite this relatively comprehensive legal architecture, young persons with disabilities are not codified as a distinct employment policy category.
Thus, in all three countries, youth and disability are separately defined and legally protected, yet none formally integrate both characteristics into a specific legal definition of "young persons with disabilities" in employment legislation.

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[4] Law on Employment of Persons with Disabilities, Official Gazette of the Republic of North Macedonia No. 44/2000. Available at: https://dejure.mk/akti/akt/zakon-za-vrabotuvanje-na-invalidni-lica

[5]Law on Prevention and Protection against Discrimination, Official Gazette of the Republic of North Macedonia No. 258/2020. Available at: https://ldbis.pravda.gov.mk/PregledNaZakon.aspx?id=54105&utm

[6]Youth Law, „Official Gazette of the RS", No. 50/2011 and 116/2022 – other Law: https://www.paragraf.rs/propisi/zakon_o_mladima.html

[7] Article 3, paragraph 1. Youth Law.

[8] Article 9, paragraph 1. Youth Law.

[9] Law on professional rehabilitation and employment of persons with disabilities, "Official Gazette of RS", no. 36/2009, 32/2013 and 14/2022 - other law: https://www.paragraf.rs/propisi/zakon_o_profesionalnoj_rehabilitaciji_i_zaposljavanju_osoba_sa_invaliditetom.html

[10]Labor Law, "Official Gazette of the RS", no. 24/2005, 61/2005, 54/2009, 32/2013, 75/2014, 13/2017 - decision of the US, 113/2017, 95/2018 - authentic interpretation and 109/2025 - other law: https://www.paragraf.rs/propisi/zakon_o_radu.html

[11] Article 12, Paragraph 4, Labor Law.

1.1.2. National Strategic Frameworks

At the strategic level, the three countries have adopted frameworks addressing youth and disability, but without systematically operationalizing their intersection.

In **Albania**, employment inclusion is guided by the National Employment and Skills Strategy 2023–2030, adopted alongside the Youth Guarantee Implementation Plan 2023–2024.[12] The National Youth Strategy and Action Plan 2022–2029 complements youth policy.[13] In relation to persons with disabilities, the National Action Plan for Persons with Disabilities 2021–2025[14] and the National Social Protection Strategy 2024–2030[15] provide the broader framework for inclusion. While these strategies address youth and disability separately, they do not define young persons with disabilities as a distinct strategic target group with specific indicators.

In **North Macedonia**, strategic guidance for disability inclusion is provided through the National Strategy on the Rights of Persons with Disabilities 2023–2030 and its accompanying Action Plan (2023–2026).[16] Youth measures are implemented primarily through Annual Operational Plans for Active Labour Market Measures, rather than through a distinct youth employment strategy. Although youth are covered under the Law on Youth and disability under the dedicated strategy, no strategic document establishes specific objectives, indicators, or dedicated measures targeting young persons with disabilities as a separate category.

In **Serbia**, the Strategy for Youth 2023–2030 adopts the definition from the Youth Law[17] The Strategy for the Advancement of Persons with Disabilities 2025–2030 defines persons

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[12] National Employment and Skills Strategy 2023–2030, including the Youth Guarantee Implementation Plan 2023–2024: https://arkiva.financa.gov.al/wp-content/uploads/2023/10/National-Employment-and-Skills-Strategy-2030_EN.pdf

[13] National Youth Strategy and Action Plan 2022–2029: https://riniafemijet.gov.al/wp-content/uploads/2023/04/SKR29_Anglisht.pdf

[14] National Action Plan for Persons with Disabilities 2021–2025: https://arkiva.shendetesia.gov.al/wp-content/uploads/2022/03/Plani-Kombetar-2021-2025_ENG.pdf

[15] National Social Protection Strategy 2024–2030: https://qeverisjavendore.gov.al/wp-content/uploads/2024/06/STRATEGJIA-KOMBETARE-E-MBROJTJES-SOCIALE-2024-2030.pdf

[16] National Strategy on the Rights of Persons with Disabilities 2023–2030, available at: https://portal.mdt.gov.mk/post-body-files/nacionalna-strategija-za-pravata-na-licata-so-poprecenost-2023-2030-file-ms7q.pdf

[17] Strategy for youth of the Republic of Serbia for the period 2023-2030, “Official Gazette RS”, 9/2023: http://demo.paragraf.rs/demo/combined/Old/t/t2023_02/SG_009_2023_002.htm

with disabilities in line with the social model of disability.[18] Active employment policy is governed by the Employment Strategy 2021–2026 and implemented through the Action Plan 2024–2026.[1920] While both youth and persons with disabilities are included in these strategies, young persons with disabilities are not identified as a distinct strategic priority.

Across the three countries, strategic frameworks reflect parallel but separate policy tracks. Intersectionality is largely implicit and not operationalized through dedicated measures, targets, or monitoring mechanisms.

1.1.3. Active Labour Market Measures (ALMMs) and Youth Guarantee

Active labour market measures across all three countries formally include persons with disabilities and youth as beneficiaries. However, age differentiation within disability measures remains limited, and intersectional targeting is generally weak.

In **Albania**, ALMMs are grounded in Law No. 15/2019 on employment promotion, which establishes the Social Employment Fund and identifies young people under 29 who are not in employment, education, or training (NEET) and persons with disabilities as special target groups.[3] While both categories are formally included, young persons with disabilities are not explicitly recognized as a distinct subgroup. Strategically, employment inclusion is framed by the National Employment and Skills Strategy 2023–2030 and the Youth Guarantee Implementation Plan 2023–2024.[4] Disability inclusion is supported through the National Action Plan for Persons with Disabilities 2021–2025[6] and the National Social Protection Strategy 2024–2030.[7] Operationally, Albania applies a mixed approach. Mainstream measures under Council of Ministers Decision No. 17 (15 January 2020) [21] include subsidized employment, on-the-job training and professional practice, covering both youth and persons with disabilities. Targeted disability support is provided through the Program for Promoting Employment of Persons with Disabilities (Council of Ministers Decision No.

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[18] Strategy for the Advancement of Persons with Disabilities 2025–2030, „Official Gazette of the RS“, no. 6/25: http://demo.paragraf.rs/demo/combined/Old/t/t2025_01/SG_006_2025_001.htm

[19] Employment Strategy of the Republic of Serbia for the period 2021-2026, “("Official Gazette of the RS", nr. 18/2021 i 36/2021 -ispr: http://demo.paragraf.rs/demo/combined/Old/t/t2021_03/SG_018_2021_003.htm

[20] Action Plan 2024–2026 for the implementation of the Employment Strategy 2021–2026, “Official Gazette of the RS”. 22/2024: http://demo.paragraf.rs/demo/combined/Old/t/t2024_03/SG_022_2024_002.htm

[21] Council of Ministers Decision No. 17, dated 15 January 2020, on employment promotion programmes: https://www.shendetesia.gov.al/wp-content/uploads/2020/01/VKM-nr.-17-date-15.01.2020.pdf

248, 30 April 2014), [22] which offers employer subsidies, training and workplace adjustments. The Youth Guarantee serves as the main youth activation instrument.[4] However, across these instruments, young persons with disabilities are not formally identified as a separate target group.

In **North Macedonia,** youth-specific measures are implemented through the Annual Operational Plans for Active Labour Market Measures and include internships, subsidized employment for young people, youth self-employment support, and training programmes for in-demand skills. Disability-focused measures implemented by the Employment Agency include financial support for permanent employment, workplace adaptation, and vocational training, partly financed through the Special Fund for Employment of Persons with Disabilities.[23] However, disability measures do not differentiate by age, and youth measures are not specifically tailored to young persons with disabilities. The Youth Guarantee in North Macedonia has been implemented in the period 2018 - 2022[24], initially as a pilot and later nationwide. While comprehensive in scope, the Youth Guarantee does not explicitly recognize young persons with disabilities as a distinct target group, nor does it institutionalize a specific accommodation framework within the scheme.

In **Serbia,** ALMMs are implemented by the National Employment Service (NES) under the Action Plan 2024–2026 for the implementation of the Employment Strategy 2021–2026,[2526] adopted by the Ministry of Labor, Employment, Veterans and Social Affairs. The Action Plan structures measures into four groups: (1) activation of persons with disabilities (including Work Activation of Persons with Disabilities and Public Works engaging persons with disabilities); (2) measures for persons with disabilities employed under special conditions (including workplace adjustment and provision of professional support to newly employed persons with disabilities); (3) individualized support for persons included in active

[22] Council of Ministers Decision No. 248, dated 30 April 2014, on the programme for promoting employment of persons with disabilities: https://natlex.ilo.org/dyn/natlex2/natlex2/files/download/110950/ALB-110950.pdf
[23] EMPLOYMENT OF DISABLED PERSONS, ESA of North Macedonia. Available at: https://av.gov.mk/employment-of-disabled-persons.nspx
[24] Youth Guarantee in North Macedonia 2018 - 2022. Available at: https://av.gov.mk/youth-guarantee.nspx
[25] Action Plan 2024–2026 for the implementation of the Employment Strategy 2021–2026, “Official Gazette of the RS”. 22/2024: http://demo.paragraf.rs/demo/combined/Old/t/t2024_03/SG_022_2024_002.htm
[26] Employment Strategy of the Republic of Serbia for the period 2021-2026, "Official Gazette of the RS", nr. 18/2021 i 36/2021 -ispr: http://demo.paragraf.rs/demo/combined/Old/t/t2021_03/SG_018_2021_003.htm

policy measures; and (4) subsidized employment and self-employment, including subsidies for hard-to-employ categories and wage subsidies for persons with disabilities without work experience. Youth are recognized within the broader category of hard-to-employ persons in certain measures. In addition to disability-focused measures, Serbia operates a Youth Guarantee programme providing job offers, education and training offers, and work placement opportunities. Within this framework, employment offers include unsubsidized youth employment, subsidized youth employment, subsidies for hard-to-employ youth, and specifically subsidies for the employment of young persons with disabilities without work experience. This constitutes a limited but explicit recognition of young persons with disabilities within the youth policy framework. However, disability-focused ALMMs themselves do not differentiate beneficiaries by age. Measures targeting persons with disabilities apply uniformly, regardless of whether the beneficiary is young or older. Therefore, while young persons with disabilities are explicitly recognized within the Youth Guarantee programme, they are not codified as a distinct category within disability employment measures or within the broader legal framework governing professional rehabilitation and employment of persons with disabilities.

1.1.4. Transition-to-Work

Transition from education to employment remains insufficiently structured for young persons with disabilities across the three countries. In **North Macedonia**, while internships, training programmes, and professional rehabilitation exist, there is no formally defined, dedicated transition-to-work scheme specifically targeting young persons with disabilities. There is also no institutionalized supported employment model established as a distinct national programme. In **Albania** and **Serbia**, although internships, traineeships, and professional rehabilitation measures exist, no formalized, dedicated transition-to-work framework exclusively targeting young persons with disabilities is identified within the provided information.

1.1.5. Monitoring and Institutional Responsibilities

Monitoring responsibilities are institutionally distributed in all three countries.

In **Albania,** implementation is carried out by the National Agency for Employment and Skills, while disability monitoring is coordinated through the Ministry of Health and Social

Protection and the National Council on Disability. Youth policy is coordinated separately. No dedicated YPWD monitoring structure is identified.

In **North Macedonia,** the Employment Agency maintains administrative data on registered unemployed persons, including persons with disabilities. The State Statistical Office provides labour market indicators. The Ministry of Social Policy, Demography and Youth is responsible for policy coordination and strategic monitoring. However, no dedicated body is exclusively responsible for monitoring employment outcomes of young persons with disabilities, and there is no evidence of systematic age-and-disability disaggregated monitoring.

In **Serbia,** the Ministry of Labor monitors policy implementation and reports to the Government, the NES maintains administrative records and implements measures, and the Republic Statistical Office provides labour market data. Despite formally defined roles, no institution is exclusively responsible for monitoring employment outcomes of young persons with disabilities. There are annual reports of the Ombudsman with a section for employment, but there are no data about complaints from young people with disabilities, or from people with disabilities for employment.[27] Since the reports did not contain the relevant information, additional details were requested through a request for access to public information; however, the response did not provide the missing information.

1.2. INSTITUTIONAL FRAMEWORK

1.2.1. Role of Public Employment Services

Across Albania, North Macedonia, and Serbia, public employment services (PES) constitute the central operational pillar of employment inclusion for persons with disabilities, including young persons with disabilities. In all three countries, employment policy is normatively anchored in laws and strategies adopted at the governmental level, while implementation is delegated to national employment agencies and their local offices. However, the institutional logic through which these measures are operationalized differs in structure, degree of formalization, and reliance on complementary actors.

In **Albania,** employment inclusion is primarily delivered through the National Agency for Employment and Skills (NAES) and its local employment offices. These offices are

[27] https://www.ombudsman.rs/index.php/izvestaji/godisnji-izvestaji

responsible for registering jobseekers, providing counseling, matching candidates with vacancies, and referring eligible individuals to active labour market measures. Law No. 15/2019 on employment promotion provides the legal anchor, particularly through the Social Employment Fund, which is intended to finance disability-related measures, including supported hiring, training, and workplace adaptation. Targeted disability measures are implemented under Council of Ministers Decision No. 248 (30 April 2014), which aims to reduce employer costs and facilitate workplace adjustments. Mainstream employment schemes regulated by Council of Ministers Decision No. 17 (15 January 2020) may also apply to persons with disabilities but are not disability-specific.

Despite the existence of a structured legal framework, the Albanian system has historically faced implementation weaknesses. Notably, earlier quota and levy provisions contained in the 1995 employment law were never implemented due to the absence of secondary legislation. As a result, quota obligations were not monitored and levies were not collected, undermining the intended financial and enforcement logic of the system. This historical precedent illustrates that the challenge lies less in the formal existence of instruments and more in enforcement capacity and inter-agency coordination. Effective implementation depends on cooperation between employment offices, tax authorities, labor inspection bodies, and disability assessment actors. Where coordination is weak, delivery becomes uneven and often dependent on project-based support.

In **North Macedonia**, the Employment Agency and its local employment centers serve as the primary operational actors. In regards to persons with disabilities, the system is regulated through the Law on Employment of Persons with Disabilities and supported financially through the Special Fund for Employment of Persons with Disabilities. The model is primarily incentive-based, relying on wage subsidies, workplace adaptation grants, and vocational training rather than mandatory employment quotas. Jobseekers must register and undergo eligibility assessment, while employers apply for financial incentives through clearly regulated procedures.

Although procedures are formally prescribed, implementation varies across local employment centers depending on staffing levels, employer engagement, and available funding. The system activates support once a person registers as unemployed, rather than through proactive transition planning from education to work. No standardized national supported employment model exists, and there is no structured transition pathway specifically tailored to young persons with disabilities. Thus, while the framework is legally

regulated and financially supported, operational outcomes depend heavily on administrative practice and employer responsiveness.

In **Serbia**, the institutional framework is normatively centralized and legally detailed. The Government adopts the Employment Strategy and corresponding Action Plans, while the Ministry of Labor, Employment, Veterans and Social Affairs drafts regulations, monitors implementation, and reports on outcomes. The NES functions as the central operational body implementing training, subsidies, internships, mediation, counseling, and professional rehabilitation. The system is primarily regulated through the Employment and Unemployment Insurance Act, the Act on Professional Rehabilitation and Employment of Persons with Disabilities, and annual action plans.

Serbia's model is characterized by a formal individualization mechanism. Each unemployed person, including persons with disabilities, undergoes registration, profiling, and development of an Individual Employment Plan (IEP). Where applicable, work capacity assessments are conducted by authorized professional teams. The Individual Employment Plan defines employment goals, selected measures, and mutual obligations between the beneficiary and the NES, and is revised at least every six months. While this mechanism represents a structured approach to personalized support, reports indicate that in practice the allocation of measures may depend more on availability and institutional capacity than strictly on assessed needs.

Overall, while all three countries rely on centralized public employment services, Serbia demonstrates the most formalized individual planning procedure, North Macedonia operates primarily through financial incentives, and Albania applies a mixed mainstream-targeted model with historically weak enforcement mechanisms.

1.2.2. Role of Civil Society Organizations

Civil society organizations (CSOs), particularly organizations working in the area of rights of persons with disabilities, play important, yet structurally different roles across the three systems.

In **Albania**, CSOs frequently fill operational gaps by providing outreach, rights navigation, employer mediation, and job-coaching style support. However, their involvement is not embedded as a standardized institutional pathway within employment offices. Instead, their

role remains supplementary and often project-dependent, especially where inter-agency coordination is weak or administrative capacity is limited.

In **North Macedonia**, CSOs similarly provide complementary services, including assistance with administrative procedures, mediation with employers, and project-based training initiatives. Their engagement is often donor-supported, rather than institutionally integrated into the employment service structure. There are no formalized referral pathways ensuring systematic cooperation between public employment services and Organizations of Persons with Disabilities (OPDs).

Serbia presents a more hybrid model. CSOs participate formally in policy development and monitoring processes, including membership in working groups for strategies and action plans, and in some cases through public calls issued by the Ministry. They may also serve as accredited service providers or project partners. Informally, CSOs play a significant intermediary role by identifying beneficiaries, preparing them for participation in measures, assisting with documentation, providing psychosocial support, and piloting innovative programs. Nonetheless, the practical implementation of innovative or targeted measures often relies on donor-funded projects, indicating that the system functions as a combination of formal institutional mechanisms and project-based operational expansion.

Across all three countries, therefore, civil society plays an intermediary and gap-filling role. While Serbia institutionalizes consultative mechanisms more explicitly, the operational reality in all contexts reflects some level of dependency on project support and ad hoc coordination.

1.2.3. Formal Procedures versus Actual Implementation Practices

A common regional pattern emerges when comparing formal frameworks with actual implementation practices.

Formally, all three systems are normatively structured. Laws define competencies, eligibility criteria, funding mechanisms, and monitoring obligations. Strategic documents outline objectives and target groups. Procedural steps for registration, assessment, and allocation of measures are prescribed.

However, practice reveals important discrepancies.

In **Albania,** although legal instruments exist, enforcement and coordination weaknesses undermine effectiveness. Administrative data may allow disaggregation by age and disability, yet cross-tabulations isolating young persons with disabilities are not routinely published. Transparency gaps limit systematic evaluation of employment outcomes.

In **North Macedonia,** implementation quality varies across local centers. The absence of a standardized supported employment model and structured transition planning limits proactive inclusion of young persons with disabilities. The incentive-based system depends heavily on employer participation, making outcomes sensitive to local labor market conditions.

In **Serbia,** although the institutional architecture is detailed and centralized, practical implementation is described as "operationally hybrid." Measures are formally categorized, but access may vary by region. Reports point to limited budgets for targeted measures, reliance on project funding, high caseloads per counselor, and uneven monitoring of long-term employment outcomes such as job retention and career progression. The transition from education to employment remains insufficiently systematized, despite the existence of training and rehabilitation measures.

Thus, across all three countries, a distinction emerges between formal regulatory design and operational delivery. Legal frameworks provide structured systems; however, administrative capacity, inter-sectoral coordination, local institutional strength, and project funding significantly shape real-world implementation.

1.3. Data Availability, Monitoring, and Evidence Gaps

1.3.1. Administrative and Statistical Data on Employment Outcomes

Across Albania, North Macedonia, and Serbia, administrative and statistical data related to persons with disabilities and youth unemployment formally exist. However, systematic monitoring of employment outcomes for young persons with disabilities remains limited in all three countries due to fragmentation, lack of cross-disaggregation, and insufficient outcome tracking.

In **Albania**, administrative data are primarily maintained by the NAES, which records registered jobseekers, disability status, participation in active labour market measures, and reported placements. While these data theoretically allow identification of both youth and

persons with disabilities, public reporting does not routinely cross-tabulate young age (15–29) with disability status. As a result, young persons with disabilities do not appear as a distinct analytical category in publicly available reports. Population-level statistics provide structural context but limited outcome tracking. The 2023 Population and Housing Census applies the Washington Group Short Set to measure disability prevalence by age and socio-economic characteristics.[28] However, census data do not capture employment transitions, retention, workplace accommodations, or program participation. Albania's Survey on Income and Living Conditions (EU-SILC/SILC) collects information related to income, health and disability, employment and material deprivation, but INSTAT states that SILC microdata are not available at micro level for external users and that only aggregated data are provided. Published tables therefore do not allow independent calculation of employment rates for young persons with disabilities. [29] Consequently, Albania lacks regularly published employment rate indicators specifically for persons with disabilities, let alone young persons with disabilities. According to the Census, 6.5% of the population aged 5 years and over reported at least one form of disability, with prevalence higher among women (7.2%) than men (5.9%).[14] Women also accounted for 55.6% of persons with at least one functional difficulty, while men accounted for 44.4%.[10] Disability prevalence is strongly age-related, as 59.5% of persons with disabilities were aged 65 years or over.[10] The most commonly reported functional difficulties were walking or climbing stairs (4.3%) and seeing (2.3%).[14] Census data also show important educational disparities: among persons with disabilities aged 15 years and over, the literacy rate was 85.8%, compared with 98.6% among persons without disabilities.[14] Only 31.9% of persons with disabilities had completed upper secondary or higher education, compared with 56.6% of persons without disabilities, while higher education attainment was 6.1% among persons with disabilities compared with 21.2% among persons without disabilities.[10]

In **North Macedonia**, administrative data are maintained by the Employment Agency, which records registered unemployed persons, disability status, participation in active measures, and use of the Special Fund for Employment of Persons with Disabilities. Annual reports provide aggregated figures on youth unemployment (up to 29 years of age) and

[28] INSTAT, *Albania Population and Housing Census 2023*, disability section: https://www.instat.gov.al/media/13626/cens-2023-census-botim.pdf

[29] European Commission, Eurostat, "EU Statistics on Income and Living Conditions: Microdata," accessed 22 June 2026, https://ec.europa.eu/eurostat/web/microdata/collections-research/european-union-statistics-on-income-and-living-conditions.

separately on persons with disabilities. However, combined cross-tabulations are not systematically published. It is therefore not possible to determine what proportion of young persons with disabilities participate in specific measures or achieve sustainable employment after subsidy expiration. Official statistical sources, including the Labour Force Survey conducted by the State Statistical Office, allow analysis by age and certain health limitations. However, regular public indicators on employment rates for persons with disabilities are not published, and tables combining age and disability variables are not routinely available. The 2021 Census provides prevalence data by age and region but does not track dynamic employment outcomes such as job retention, duration of unemployment, or transition from education to work.[30] The 2021 Census confirms that around 5% of the population in North Macedonia has a form of disability.

In **Serbia**, national census data (2022) record that 5.6%[31] of the population have a disability, though methodological changes affect comparability with earlier census rounds. Public statistical publications provide demographic breakdowns by sex and region, and impairment categories. However, impairment categories are not mutually exclusive, and official statistics do not clearly indicate how many persons with disabilities are young people in relation to labour market participation. Administrative data from the NES are comparatively detailed regarding participation in active labour market measures. The 2024 Annual Report records: 31,464 individual consultations with 17,111 unemployed persons with disabilities, 26,703 employability assessments, 25,978 individual employment plans, 14,830 persons with disabilities covered by individual planning, and 6,940 persons with disabilities included in funded measures.[32] These figures illustrate that while planning and counselling activities are extensive, the number of beneficiaries participating in concrete employment measures is significantly lower. However, similarly to Albania and North Macedonia, public reports do not systematically disaggregate outcomes by age within disability categories. Young persons with disabilities are therefore not consistently visible in outcome monitoring.

1.3.2. *Monitoring Gaps and Limits of Available Evidence*

[30] Census of Population, Households and Dwellings in the Republic of North Macedonia, 2021. Available at: https://www.stat.gov.mk/PrikaziSoopstenie_en.aspx?rbrtxt=146.
[31] The Statistical Office of the Republic of Serbia, 2022 Population, Households and Dwellings Census https://www.stat.gov.rs/sr-Latn/vesti/20231201-invaliditet
[32] The Annual Report of the National Employment Service for 2024: https://www.nsz.gov.rs/filemanager/Files/Dokumenta/Izve%C5%A1taj%20i%20program%20rada%20NSZ/Izve%C5%A1taj%20o%20radu%20NSZ%20za%202024.%20godinu.pdf

Across Albania, North Macedonia, and Serbia, a common pattern emerges: monitoring systems are primarily focused on outputs, such as the number of beneficiaries, consultations, and measures implemented, rather than on long-term employment impact. While administrative and statistical data formally exist, key outcome indicators remain either unavailable or not systematically published.

In **Albania**, publicly accessible information does not consistently include data on employer quota compliance, levy collection into the Social Employment Fund, fund expenditures by beneficiary characteristics, workplace accommodation measures, or post-program employment retention at 6 or 12 months.

In **North Macedonia,** reports do not provide cross-disaggregated data combining age and disability, nor do they systematically track employment sustainability after wage subsidies end, retention rates, effectiveness of workplace accommodations, or structured transition from education to employment. Institutional databases operate separately, without integrated mechanisms for longitudinal tracking.

In **Serbia**, although participation data are relatively detailed, significant outcome gaps persist. Public reporting does not systematically present post-program employment status, job quality indicators, long-term retention rates, or integrated datasets linking demographic characteristics with employment sustainability. Data on unsuccessful applicants or dropout reasons are also not routinely available.

A specific finding for Serbia is that the NES has a relatively developed administrative and counselling framework for registered unemployed persons with disabilities, including young persons with disabilities. The data provided by the NES cover registered unemployed persons, participation in active employment measures, and employment status after participation, including follow-up after six and twelve months. This indicates that Serbia has certain administrative capacity to monitor the employment trajectories of registered beneficiaries. In practice, access to Active Labour Market Measures is based on an employability assessment and an Individual Employment Plan, which defines the level of support needed, the activities to be undertaken and the measures in which the jobseeker may participate. The response also highlights that lack of work experience and relevant labour market skills is one of the key reasons for inactivity and non-inclusion of young people in

the labour market, which is why young people under 30 without work experience are treated as a harder-to-employ category with priority for inclusion in active employment measures.[33] Young persons with disabilities in Serbia may also benefit from the Youth Guarantee pilot, professional practice, traineeships and other measures aimed at acquiring practical knowledge and first work experience. However, this framework is primarily linked to persons registered with the NES, meaning that young persons with disabilities who are outside the register may remain less visible. In addition, the quality of support depends strongly on the individual planning process and the capacity of employment counsellors. The NES also points to cooperation with employers and CSOs, including long-standing cooperation with the Forum of Youth with Disabilities, particularly in projects aimed at improving employability, piloting new support measures and strengthening the capacities of counsellors working with persons with disabilities.[34]

Overall, monitoring frameworks across all three countries remain largely implementation-oriented rather than impact-oriented. The absence of consistent age in regards to disability disaggregation, limited transparency of outcome indicators, and lack of longitudinal tracking create substantial evidence gaps.

Importantly, desk research alone cannot explain critical dimensions of labour market inclusion. Quantitative data do not capture administrative barriers, employer attitudes, adequacy of workplace accommodations, inter-institutional coordination practices, or the lived experiences of young persons with disabilities during their transition from education to employment. Furthermore, fragmented databases prevent tracking of individual employment trajectories over time.

These limitations reinforce the need for primary research to complement administrative data and to provide a fuller understanding of both systemic and experiential barriers to employment inclusion.

[33] Data provided by the National Employment Service of Serbia in response to an access to public information request, 2021–2025.

[34] Data provided by the National Employment Service of Serbia in response to an access to public information request, 2021–2025.

2. PRIMARY RESEARCH

2.1. Methodology

The primary research combined an online survey with young persons with disabilities and interviews with relevant institutional and non-institutional stakeholders in Albania, North Macedonia and Serbia. The purpose of the primary research was to collect direct insights on the experiences of young persons with disabilities in accessing employment, employment support measures, career guidance, reasonable accommodation and protection from discrimination.

The online survey was conducted among young persons with disabilities in the three countries. In Serbia, the survey collected **46 responses**, in North Macedonia it collected **55 responses** and in Albania **20 responses**. The survey sample is not representative and the findings cannot be generalised to the entire population of young persons with disabilities in the three countries, however, the results provide important indicative insights and help identify key tendencies, challenges and perceptions among respondents.

In addition to the survey, interviews were conducted in all three countries using a structured questionnaire/interview guide. The interviews were designed to complement the survey findings by gathering more detailed information from institutions, experts, CSOs and young persons with disabilities. The same general approach was applied across the three countries in order to allow comparison of the main findings.

In **Albania,** interviews were conducted with representatives of CSOs, including Autism Speaks, CCIS Albania, the Down Syndrome Albania Foundation and PRO PAK Service Center. On the institutional side, input was received from AKPA – the National Employment and Skills Agency, while the Commissioner against Discrimination provided a link to relevant publicly available information. One Member of Parliament was also included in the consultation process. Other contacted institutions did not provide official responses. In addition, three interviews were conducted with young persons with disabilities in Albania, and a short poll/survey was completed by 20 young persons with disabilities. These inputs provided additional insight into individual experiences with employment services, access to information, barriers to work, discrimination, reasonable accommodation and priority improvements.

In **North Macedonia**, interviews were conducted with representatives of the Ministry of Social Policy, Demography and Youth, a Member of Parliament, the Employment Agency, the Ombudsman, the Commission for Prevention and Protection against Discrimination, the Public Institution Rehabilitation Institute for Children and Youth – Skopje, a Professor of Labour Law at the Faculty of Law "Iustiniaus Primus" at Ss. Cyril and Methodius University (UKIM), NGOs working with persons with disabilities, and young persons with disabilities. Responses to requests for access to public information were received from the Employment Agency and the Ombudsman.

In **Serbia**, interviews were conducted with representatives of the the Ministry of Labour**,** Employment**,** Veteran and Social Affairs of the Republic of Serbia, the Ministry of Tourism and Youth of the Republic of Serbia, the Ombudsman, the Commissioner for Equality, the National Employment Agency, NGO Youth with Disabilities Forum, and a human rights expert. Interviews were also conducted with young persons with disabilities. In addition, responses were received to requests for information submitted as part of the research, from all interviewed institutions.

The combination of survey data, stakeholder interviews, interviews with young people with disabilities, and responses to information requests enabled the research to capture both the experiences of young persons with disabilities and the perspectives of institutions and organisations involved in employment-related support. This mixed approach provides a stronger basis for identifying common challenges, country-specific differences and practical recommendations for improving access to employment for young persons with disabilities.

2.2. Online survey with young people with disabilities

Among respondents, registration with Employment Agencies varies across the three countries. In Albania, the results are evenly distributed, with 50% of respondents registered and 50% not registered. In Serbia, the share of respondents who are not registered is slightly higher, at 55%, compared to 45% who are registered. The largest difference is observed in North Macedonia, where almost two-thirds of respondents, or 64%, are not registered with the Employment Agency, while 36% reported that they are registered (Chart 1).

Overall, although the sample is not representative, the data suggests that a considerable share of young persons with disabilities who participated in the survey are not formally connected to public employment services. This is most visible in North Macedonia, but it is also

relevant in Serbia, while Albania shows a more balanced situation. The findings may point to the need for stronger outreach, better information, and more accessible support from Employment Agencies for young persons with disabilities across the three countries (Chart 1).

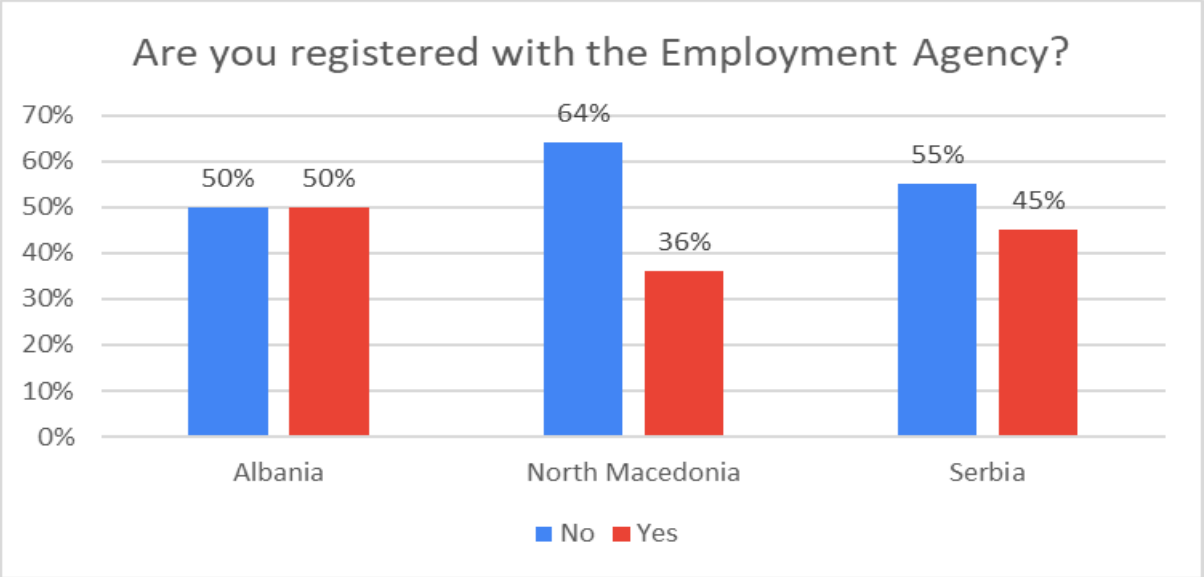


Chart 1

The level of exposure to employment programmes differs noticeably between the surveyed respondents in the three countries. In Albania, most respondents have not participated in such programmes, with 65% answering “No” and 35% answering “Yes”. In North Macedonia, participation is almost evenly divided, as 51% have not participated, while 49% have taken part in an employment programme. Serbia shows a more positive pattern, with 55% of respondents reporting participation, compared to 45% who have not participated (Chart 2).

Overall, although the sample is not representative, the results suggest that respondents in Serbia have had the highest level of participation in employment-related support measures, while participation appears lowest in Albania. North Macedonia stands between the two, with nearly equal shares of participants and non-participants (Chart 2).

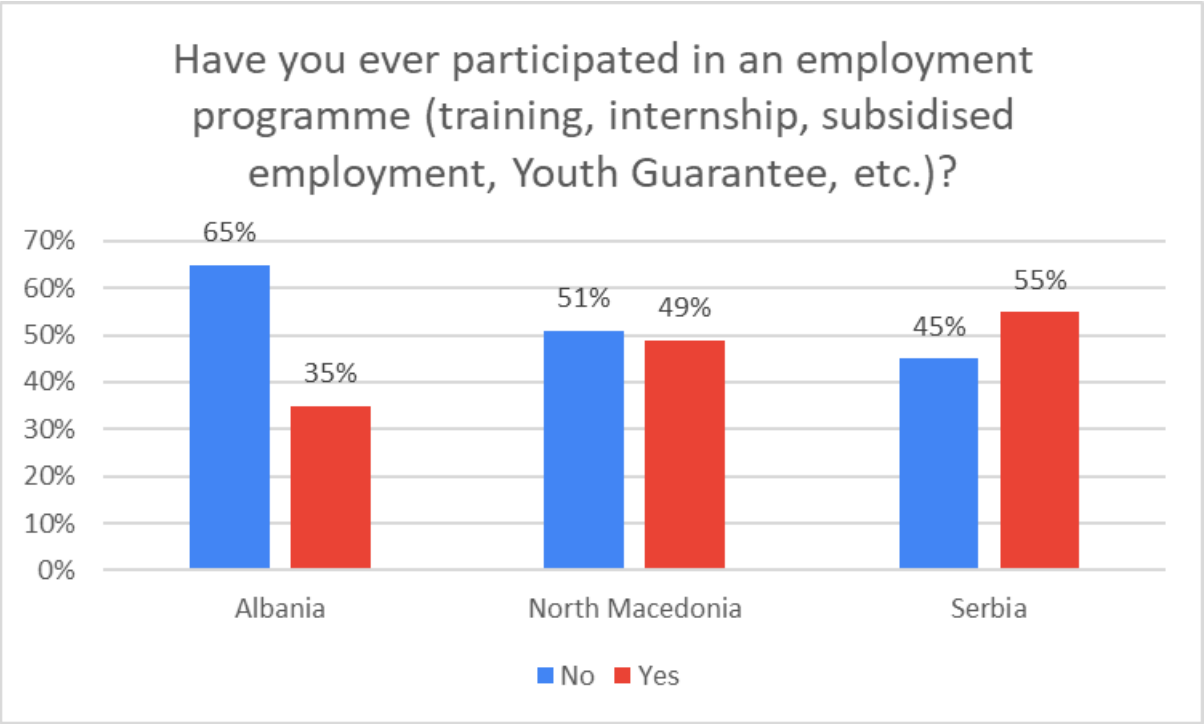


Chart 2

The data presented here refers only to respondents who reported that they had participated in some type of employment programme. Among these respondents, training appears to be the most common form of support, particularly in Albania, where 67% of participants reported taking part in training, followed by Serbia with 45% and North Macedonia with 28%. Internship or practical training was reported by around one quarter of participants in Albania (25%) and Serbia (24%), while it was lower in North Macedonia (14%, Chart 3). North Macedonia shows a more diverse distribution of programme types, with respondents reporting participation in the Youth Guarantee (25%), wage subsidy programmes (25%) and grants to start their own business (8%). In Serbia, wage subsidy programmes were also relatively common (27%), while Albania's reported participation was concentrated mainly in training and internships. Overall, the results suggest that, among those who accessed employment programmes, training is the most frequently used measure, while other types of support appear less evenly distributed across the three countries (Chart 3).

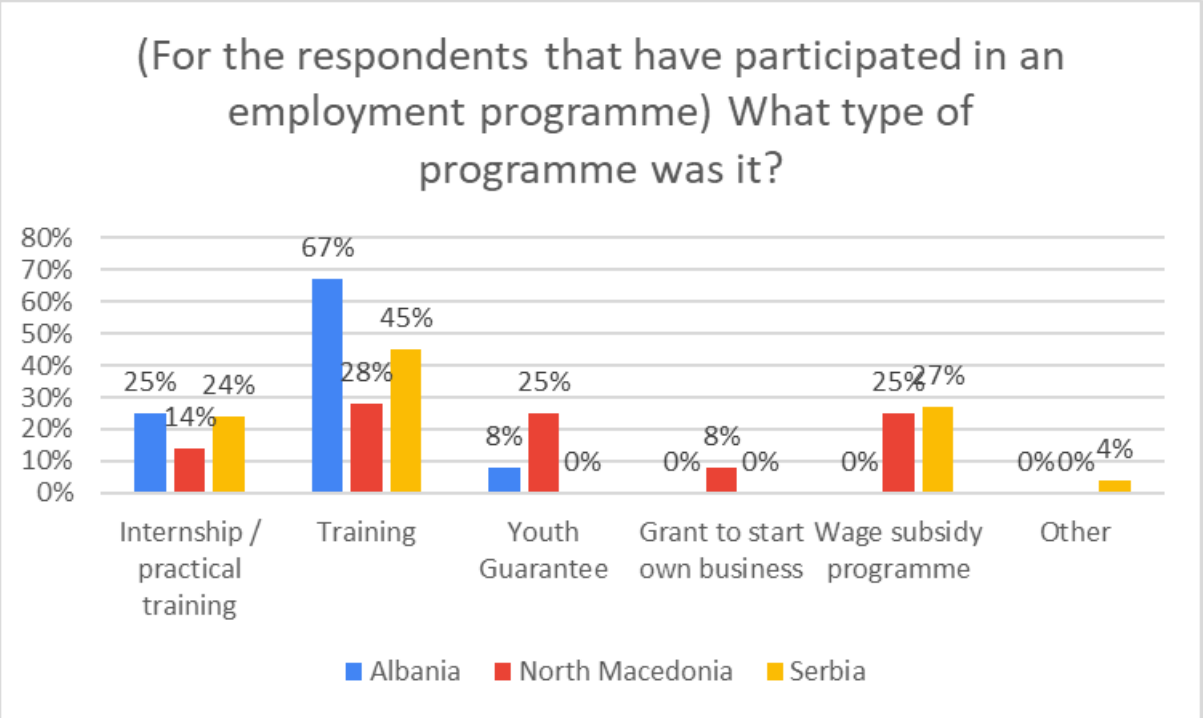


Chart 3

Adequate accommodation appears to be provided unevenly across the employment programmes attended by respondents. It should be noted that these findings refer only to respondents who had participated in an employment programme. North Macedonia shows the most positive result, with 64% of participants stating that the programme provided adequate accommodations according to their needs. An additional 18% reported that accommodations were provided only partially, while 18% stated that they were not provided (Chart 4).

In Albania, the assessment is more mixed. Half of the respondents (50%) indicated that accommodations were provided only partially, while 31% stated that the programme did not provide adequate accommodations. Only 13% reported that their needs were adequately accommodated. In Serbia, 28% answered positively and 24% reported partial accommodation, while 36% stated that such support was not necessary in their case. Overall, the findings suggest that accessibility and individualised support within employment programmes are not consistently ensured. While North Macedonia records the highest level of positive assessment, the results from Albania and Serbia point to the need for more systematic provision of reasonable accommodation, adapted conditions and support measures for young persons with disabilities. As the sample is not representative, the results should be interpreted as indicative (Chart 4).

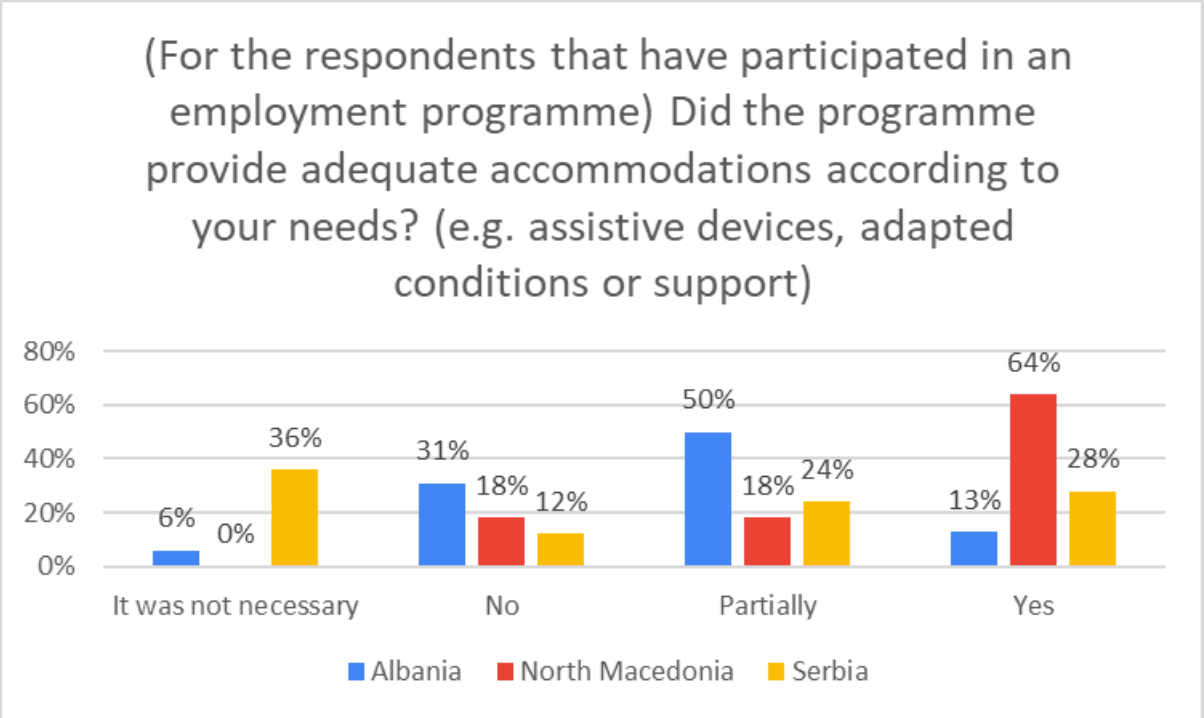


Chart 4

The contribution of employment programmes to actual employment outcomes appears to differ across the three countries. For Albania, the results should be interpreted with caution, as Chart 5 is based on respondents who provided a substantive answer to the employment-outcome question, while the number of respondents who clearly reported participation in an employment programme is smaller. In Albania, half of the respondents included in the Chart 5 outcome calculation (50%) stated that the programme did not contribute to their employment. However, a substantial share (44%) reported that the programme contributed to temporary employment, while only 6% linked it to permanent employment. When the analysis is restricted only to respondents who clearly reported participation in an employment programme, 28.6% stated that the programme did not lead to employment, 57.1% reported temporary employment and 14.3% reported permanent employment. Due to the small number of confirmed programme participants, these Albania findings should be treated as indicative.

In North Macedonia, the responses are more evenly distributed. Around one third of respondents stated that the programme did not contribute to their employment (35%), while the same share reported that it contributed to permanent employment (35%). An additional 29% said that the programme contributed to temporary employment. In Serbia, the majority of respondents (59%) reported that the programme did not contribute to their employment.

At the same time, 33% stated that it contributed to permanent employment, while only 8% reported temporary employment as an outcome (Chart 5).

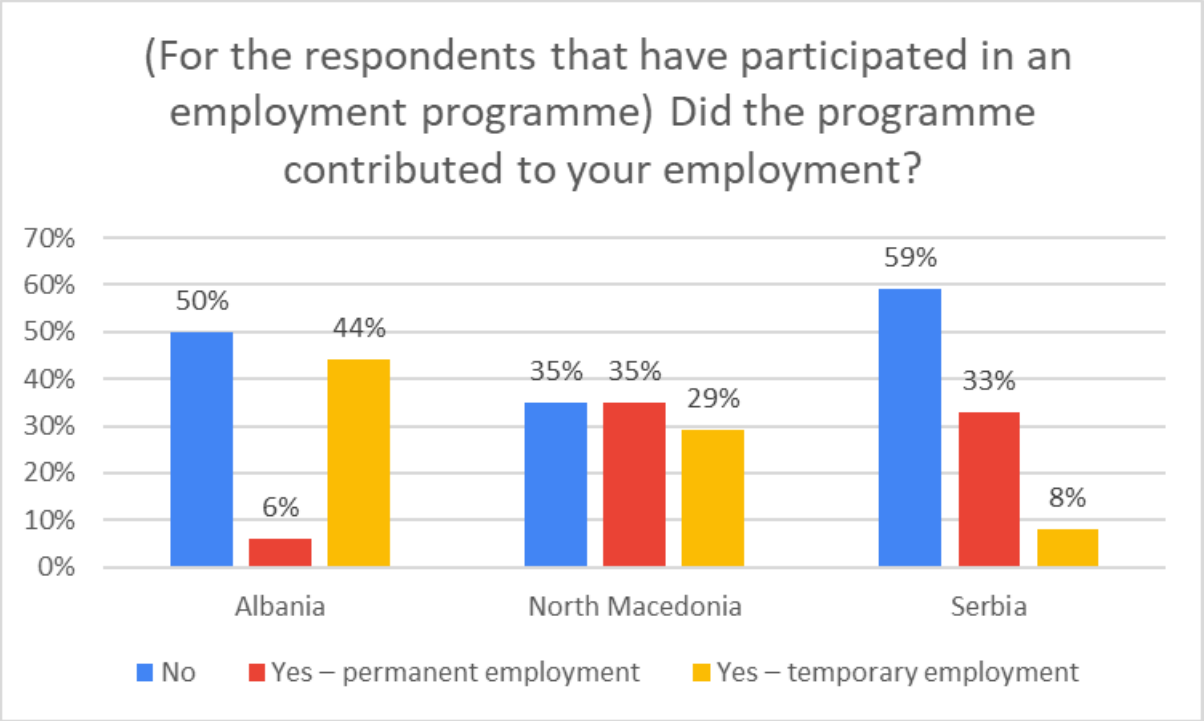


Chart 5

Respondents were also asked to identify up to two challenges they consider to be the biggest when finding a job, from the provided list of options. The results show some differences across the three countries. In North Macedonia, the most frequently mentioned challenge was the lack of adapted support, followed by employers' attitudes and limitations related to health conditions. This suggests that young persons with disabilities often face barriers linked not only to the labour market itself, but also to the insufficient availability of tailored support mechanisms. In Serbia, employers' attitudes were most often identified as the main challenge, followed by limitations related to health conditions and lack of work experience. This indicates that perceptions and readiness among employers remain an important barrier, while young people also face difficulties related to previous labour market exposure. In Albania, although the sample is smaller, employers' attitudes were again the most frequently mentioned challenge, followed by lack of adapted support. Other challenges, such as health-related limitations, lack of work experience and accessibility issues, were also mentioned, pointing to a combination of social, institutional and practical barriers to employment.

Perceived discrimination during job application processes emerges as a significant issue among respondents in all three countries. In Albania, half of the respondents (50%) reported feeling discriminated against because of their disability, while an additional 20% stated that

they had experienced discrimination based on both age and disability. Only 30% reported that they had not felt discriminated against when applying for a job. In North Macedonia, discrimination appears most frequently as an intersection of both age and disability, reported by 46% of respondents. A further 22% felt discriminated against because of disability, while 7% identified age as the reason. Only 16% stated that they had not experienced discrimination during job applications. In Serbia, disability was the most commonly reported basis for discrimination, mentioned by 46% of respondents, while 19% reported discrimination on the grounds of both age and disability. Around one third of respondents (31%) stated that they had not felt discriminated against. In general, although the sample is not representative, the findings indicate that discrimination in job application processes remains a relevant concern for young persons with disabilities across the three countries. Disability appears as the main reported ground of discrimination, either on its own or combined with age, particularly in North Macedonia (Chart 6).

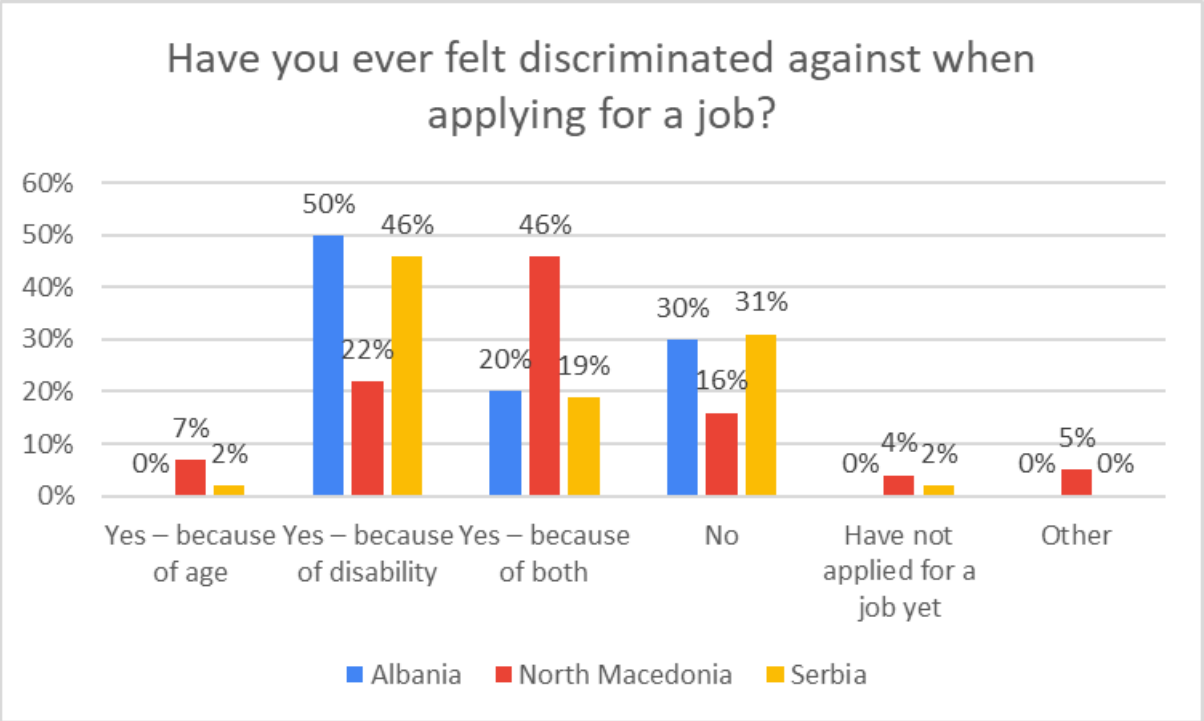


Chart 6

Workplace accommodations appear to be provided inconsistently across the three countries. In Albania, the largest share of respondents stated that employers provide reasonable or appropriate accommodations sometimes (40%), while 35% said this happens rarely and 20% answered never. Only 5% reported that such accommodations are usually provided. A similar pattern is visible in North Macedonia, although the share of positive responses is slightly higher. One third of respondents (33%) stated that accommodations are provided

sometimes, while 31% said rarely and 24% answered never. Only 12% reported that employers usually provide appropriate workplace accommodations. Serbia shows the most concerning pattern, with almost half of respondents (48%) stating that accommodations are provided rarely. A further 38% said they are provided sometimes, while only 4% answered yes (Chart 7).

Again, although the sample is not representative, the findings suggest that reasonable accommodation in the workplace is not yet a regular or systematic practice. Across all three countries, positive responses remain low, indicating that young persons with disabilities may still face significant barriers in accessing adapted working conditions and adequate employer support.

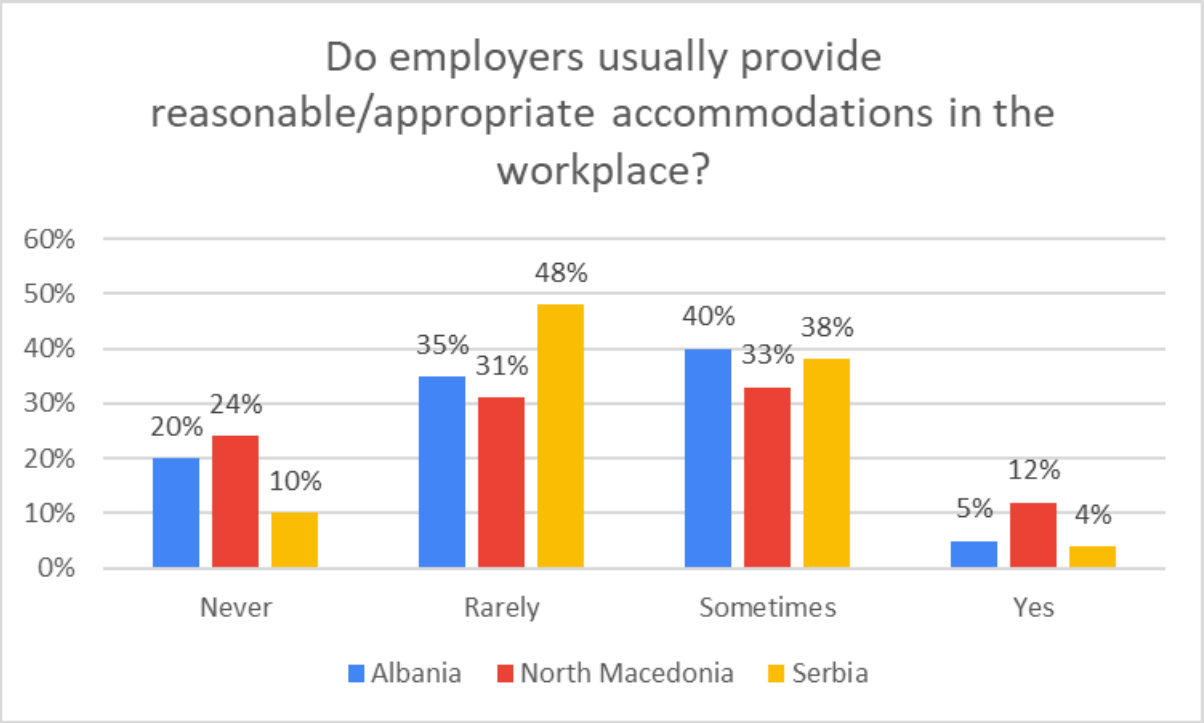


Chart 7

Access to career counselling and guidance appears particularly limited in North Macedonia and Serbia, where more than half of respondents stated that they never receive such support (53% in both countries). In addition, 27% of respondents in North Macedonia and 30% in Serbia reported receiving career counselling only rarely, indicating that structured guidance is largely absent or irregular for many respondents. Albania shows a somewhat more favourable pattern. The largest share of respondents (40%) reported receiving counselling or guidance sometimes, while 30% said they receive it rarely and 25% stated that they never

receive such support. However, regular access remains low in all three countries, with only 5% in Albania, 5% in North Macedonia and 8% in Serbia reporting that they receive career counselling regularly (Chart 8).

Respondents were asked afterwards to indicate who provides career counselling if they did receive support. Across all three countries, the answers show that career counselling is generally limited and fragmented, with many respondents reporting that they do not receive any counselling.

In North Macedonia, the most common answer was that respondents do not receive career counselling. Among those who did receive some form of support, NGOs and CSOs were the most frequently mentioned providers, followed by schools/universities, employment-related programmes, the workplace, and private or self-initiated support. In Serbia, the pattern is similar, with a large share of respondents stating that they do not receive career counselling. Where support was mentioned, it most often came from NGOs, employers, the NES, or informal sources such as mentors, colleagues, family or friends. In Albania, fewer respondents explicitly stated that they do not receive counselling, but the answers suggest that support is still inconsistent. Career guidance appears to come from a mix of self-searching and online information, NGOs, training centres, schools, organisations and, in some cases, agencies or institutions.

The findings suggest that career counselling for young persons with disabilities is not systematically provided in any of the three countries. Instead, support often depends on NGOs, individual initiative, occasional institutional contact, or informal sources.

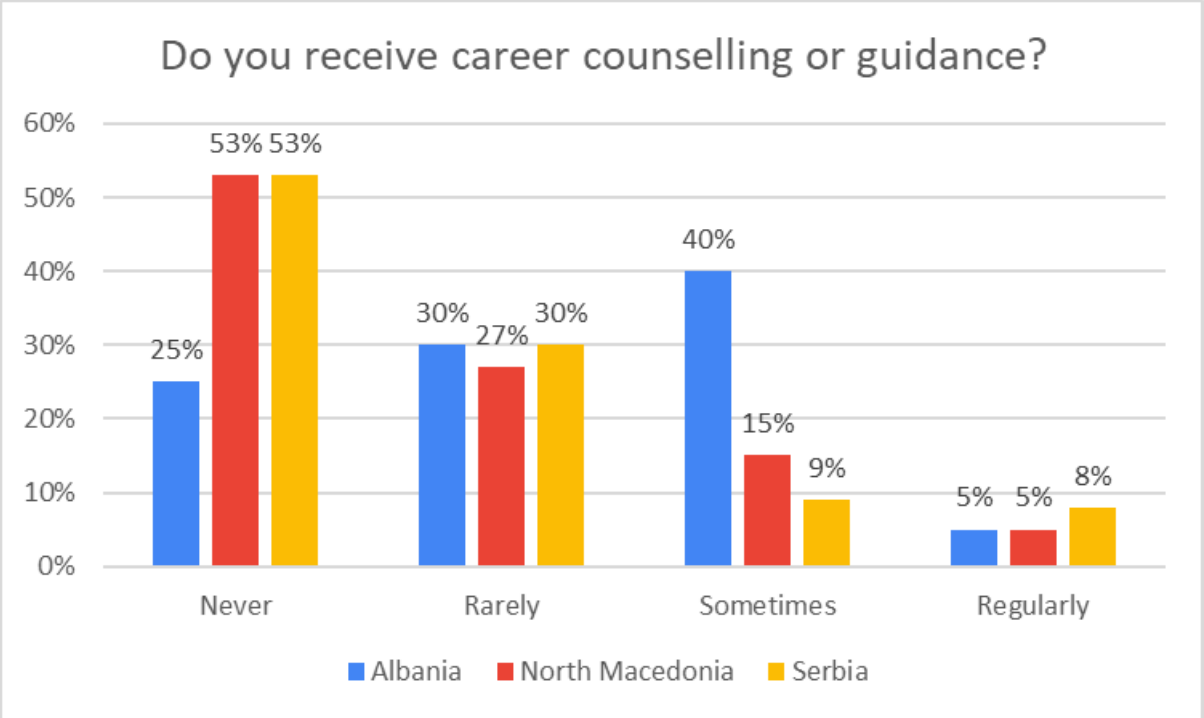


Chart 8

Respondents generally do not perceive employment programmes as fully designed and adapted for young people with disabilities. This is most visible in Albania, where 85% of respondents stated that programmes are only partially adapted, while 15% answered No and none of the respondents answered Yes. In North Macedonia, perceptions are more critical: 47% of respondents stated that employment programmes are not designed and adapted for young people with disabilities, while 43% said they are only partially adapted. Only 10% gave a positive response. Serbia shows a similar pattern, with 53% reporting partial adaptation, 41% answering negatively and only 6% stating that programmes are adequately designed and adapted. The low share of positive responses across all three countries suggests that existing employment programmes are perceived as insufficiently tailored to the needs of young persons with disabilities, especially in terms of accessibility, individualised support and adaptation of measures (Chart 9).

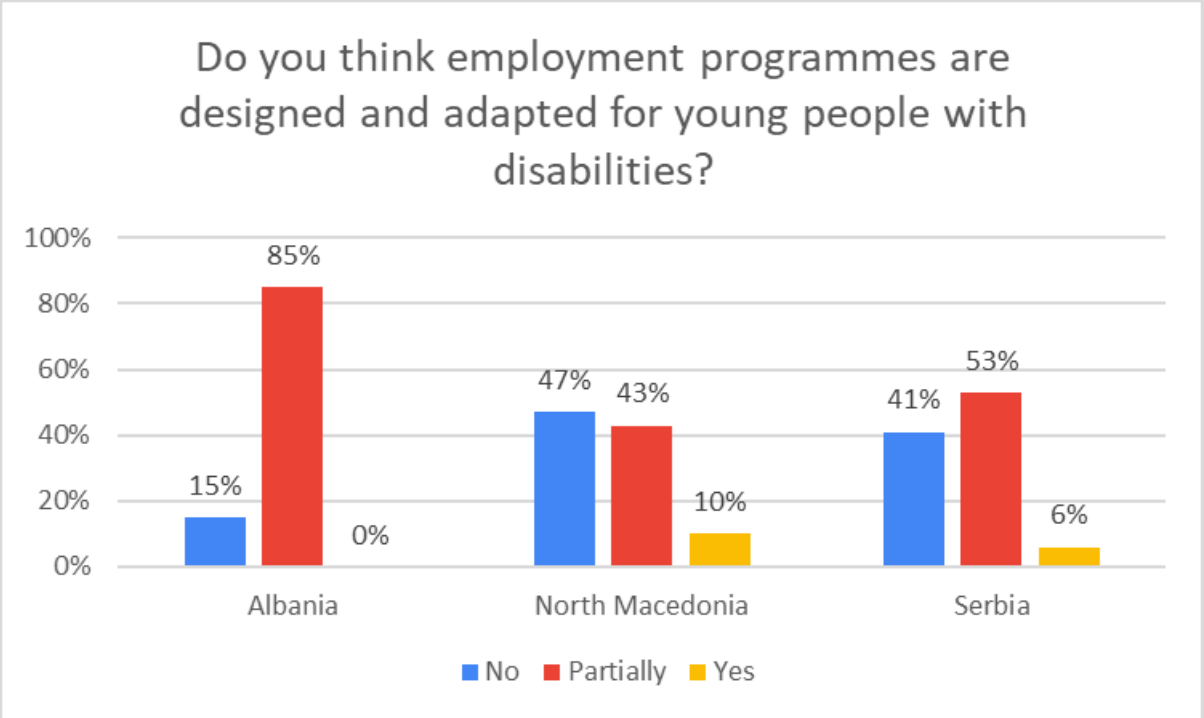


Chart 9

Respondents were asked: **"In one sentence, what is the biggest change needed to help young persons with disabilities find employment?"** The main messages from the three countries are summarised below as country-specific conclusions and recommendations, followed by common priorities identified across the responses:

Albania

- Employment support for young persons with disabilities should become more practical and better connected to real job opportunities.
- Greater emphasis is needed on accessible training, internships and work-based learning opportunities that can support the transition from education or unemployment into the labour market.
- Institutions should improve outreach and information-sharing, so that young persons with disabilities are better informed about available employment services and programmes.
- Employers should be encouraged and supported to provide reasonable accommodation and inclusive working conditions.

North Macedonia

- Employment programmes should be more directly adapted to the needs of young persons with disabilities, rather than being designed as general measures with limited individual support.
- Stronger career counselling and guidance are needed, particularly in preparing young persons with disabilities for job applications, interviews and career planning.
- Measures should focus not only on participation in programmes, but also on whether they lead to concrete and sustainable employment outcomes.
- Reducing discrimination in recruitment and improving employers' understanding of disability and reasonable accommodation should be a priority.

Serbia

- Employment support should focus more strongly on the effectiveness of programmes and their link to actual employment.
- More systematic cooperation is needed between Employment Agencies, employers and organisations of persons with disabilities.
- Wage subsidies and other employer-oriented measures should be combined with mentoring, workplace adaptation and continued support for young employees with disabilities.
- Career guidance and access to information should be strengthened, especially for young persons who are outside formal employment support systems.

Common messages across the three countries

- Employment programmes should be more personalised, accessible and adapted to the specific needs of young persons with disabilities.
- Career counselling and guidance should be continuous, practical and available at different stages of the job-search process.
- Employers need more awareness, guidance and incentives to hire young persons with disabilities and provide reasonable accommodation.
- Training and internships should be linked more clearly to real employment opportunities, rather than remaining isolated short-term measures.
- Public institutions, employers, schools and organisations of persons with disabilities should cooperate more closely in designing and implementing employment support.
- Measures should be assessed not only by the number of participants, but also by their outcomes, including job placement, job quality and sustainability of employment.

2.3. Interviews with relevant institutions, organisations and individuals

2.3.1. Recognition and visibility of young persons with disabilities as a distinct group

Albania

The primary research in Albania suggests that young persons with disabilities are formally included in employment policy, but mainly through broader categories rather than as a distinct intersectional policy group. From the perspective of the Agency for Employment and Skills, the existing legal and strategic framework already provides support for both young people and persons with disabilities. The Agency states that Albania's framework includes measures for "the employment of young people and persons with disabilities," and that young persons with disabilities may benefit from general employment promotion and vocational training programs, including job mediation, vocational training and employer subsidies. At the same time, the Agency acknowledges that "the degree of access and adaptation of these measures for this category remains a challenge, especially in the transition from education to the labor market".

This shows that the Agency recognizes young persons with disabilities as covered by existing services, but not necessarily as a distinct group requiring a separate policy approach. They appear mainly through the categories of youth, persons with disabilities or priority jobseekers. Although the Agency reports that data on registered unemployed persons with disabilities include age, education and qualifications, this does not by itself amount to an intersectional approach. The issue is not only whether the system can identify them administratively, but whether it uses that identification for targeted outreach, tailored support, specific indicators and monitoring of employment outcomes.

CSO interviews provide a more critical view. Across these interviews, respondents state that young persons with disabilities are not treated in a specific way as an intersecting group, but are usually mentioned either as "young people" or as "persons with disabilities". One respondent notes that young persons with disabilities are not specifically included in the law on employment promotion, although they may benefit from employment promotion programs and Youth Guarantee measures. In practice, this creates a "policy gap," because the specific barriers linked to both age and disability are not fully addressed. CSOs also emphasize that access to Active Labor Market Measures is mostly formal. One respondent summarizes this as: "Formally yes, but in reality access is limited". Another states more directly that "in most cases, they do not have real access, and even less the possibility to

access them independently". Other CSO respondents link this limited access to weak implementation of existing legislation, lack of sanctions, poor accessibility, employer resistance, lack of information and the absence of a structured transition from education to employment.

The interviews with young persons with disabilities and the short survey support this finding at the service-delivery level. One interviewed young person had accessed training through an organization rather than directly through the Employment Agency, while another respondent, a 28-year-old woman with Multiple Sclerosis, had no contact with any Employment Agency at all. This suggests that some young persons with disabilities may be formally covered by employment policies while remaining weakly reached by public employment services. The short survey, based on 20 responses from young persons with disabilities, also asked whether respondents were registered with the public Employment Agency and whether they had participated in employment programs, such as training, internships, wage subsidies, the Youth Guarantee or similar measures. While the survey is not nationally representative, it provides indicative evidence on whether young persons with disabilities are visible within formal employment support systems.

The Member of Parliament interview supports the finding that the group is weakly visible politically. When asked whether young persons with disabilities are discussed in parliamentary debates on employment, the Member of Parliament answered: "To my knowledge, no. There have been no such discussions". The same respondent also stated that there had been no specific initiatives addressing this group and that they had not observed political will to treat them as a separate policy group.

Overall, the interviews and survey suggest that young persons with disabilities in Albania are formally present but operationally weakly visible. The lack of a distinct category affects targeting, outreach, eligibility, support and monitoring. It makes employment measures more generic, limits adaptation to school-to-work transition needs and weakens the ability to track whether programs lead to sustainable employment. The contrast between institutional responses, CSO perspectives, youth interviews and the short survey shows that the main issue is not only formal recognition, but whether recognition is translated into direct outreach, individualized support, accessible services, enforcement and monitored employment outcomes.

North Macedonia

The research findings indicate that institutions in North Macedonia generally do not recognize young persons with disabilities as a distinct category within employment policies. Instead, they are most often treated as part of broader groups, namely “young people” and “persons with disabilities.” This approach results in their limited visibility in policymaking processes and the absence of specifically targeted measures.

In contrast to the institutional approach, CSOs and persons with disabilities themselves emphasize that recognizing young persons with disabilities as a separate category would allow for greater focus on their specific needs and the development of more adequate measures for their employment and empowerment. According to their views, the existing unified approach results in young persons with disabilities remaining insufficiently covered by current programs.

This perception is also reflected in the respondents' statements. One young person with a disability stated: “I would not say that there is no recognition at all, young persons with disabilities are indirectly recognized as a category under the broader categories of ‘young people’ and ‘persons with disabilities.’ For me, it is much more important how this works in practice, and unfortunately, in practice, it is superficial. Programs do exist, but they are not focused on addressing the real barriers faced by persons with disabilities or on providing genuine support.”

From an institutional perspective, representatives of the Ministry pointed out that young persons with disabilities were indirectly taken into account in the development of certain policies and programs, but they are not explicitly defined as a separate target group. The main reasons identified for this include the lack of detailed statistical data and the dominant practice of categorization based on broader groups. Nevertheless, some institutions expressed interest in developing targeted measures in the future, particularly in internships, career counselling, and supported employment.

Regarding youth policies, representatives of the Ministry responsible for social policy, demography, and youth emphasized that young persons with disabilities are not sufficiently explicitly targeted in existing youth strategies. Although the principle of inclusiveness is formally present, there is a lack of concrete activities, indicators, and budget lines specifically directed toward this group. Furthermore, although some cooperation with CSOs exists, young persons with disabilities are rarely directly involved in policymaking processes, despite institutional commitments to ensuring their greater participation.

Similarly, issues related to young persons with disabilities are rarely the subject of parliamentary debates. Although there are individual initiatives, they generally address

persons with disabilities or young people as broader categories. Members of Parliament mostly receive feedback through CSOs, while direct communication with young persons with disabilities remains limited. Some institutional interlocutors pointed out that young persons with disabilities are less frequently directly involved in consultative processes, emphasizing the need for additional mechanisms to encourage their greater participation and engagement.

In terms of the overall assessment, some interviewed institutional representatives believe that there is a declarative political will to improve the situation of persons with disabilities, but that concrete and systemic measures aimed at increasing the employability of young persons with disabilities are lacking. On the other hand, CSOs highlight that although formal access to active labour market measures exists, in practice, young persons with disabilities face significant barriers, such as the inaccessibility of institutions and workplaces, prejudice among employers, insufficiently adapted training programs, lack of individualized support, and limited opportunities for practical experience.

Serbia

Institutional perspectives on the visibility of young persons with disabilities in policy design differ from the perspectives of CSOs and young persons with disabilities themselves. The NES, the Commissioner for Equality and the human rights expert consider this group to be visible, and assess the legal framework as generally clear and adequate. They share the view that young persons with disabilities are recognised because they are included within broader vulnerable groups.The NES emphasizes that young people are determined as hard to employ. In the category of hard employable there are also people with disabilities. Young people with disabilities may qualify under both categories (young people and persons with disabilities) when applying for a measure, which can give them additional priority compared to applicants who belong to only one of these categories. They use a separate identification code in the database to classify persons with disabilities**.**

On the other hand, CSOs assess this recognition as insufficient. According to their perspective, persons with disabilities are recognised as part of the broader disability category, without differentiation based on age, while young people are recognised only as young people. As a result, young persons with disabilities are not treated as a distinct group. CSOs do not consider this level of recognition to be adequate. Similarly, the interviewed young persons with disabilities stated that they do not see themselves reflected in policy design or implementation. One interviewed young person noted that the National

Employment Agency only formally informed him about available measures and contacted him for jobs that were not appropriate for his disability, such as jobs requiring him to carry heavy items despite having a physical disability. Interviewed young persons with disabilities also reported that they did not feel treated equally compared to persons without disabilities or compared to older persons with disabilities.

The response of the Ombudsman indicates that young persons with disabilities in Serbia are recognised within the broader legal and strategic framework for the protection of persons with disabilities. Serbia has ratified the UN Convention on the Rights of Persons with Disabilities and has adopted several relevant laws and strategic documents addressing disability rights, anti-discrimination, professional rehabilitation, employment and social protection. However, in practice, young persons with disabilities appear to be treated mainly as part of the broader category of persons with disabilities, rather than as a distinct group facing specific barriers linked to both age and disability. This suggests that their visibility as an intersectional policy group remains limited, which may affect the design of targeted measures, outreach, support and monitoring.

The Ministry of Tourism and Youth states that young persons with disabilities are recognised to a significant extent within Serbia's legislative framework and strategic documents related to employment. According to the Ministry, existing laws, measures and programmes aim to support their inclusion in the labour market and ensure equal opportunities. In the youth policy framework, young persons with disabilities are explicitly recognised in certain objectives, indicators and measures of the Youth Strategy of the Republic of Serbia 2023–2030, while in other cases they are included under the broader category of young people from vulnerable social groups. This suggests that young persons with disabilities are visible within youth policy, although their recognition is not always framed through a distinct intersectional approach combining both age and disability.

The Ministry of Labour, Employment, Veteran and Social Affairs also emphasizes that young persons with disabilities are recognised within the broader employment policy framework in Serbia. The Employment Strategy 2021–2026 and its action plans identify both young people and persons with disabilities as categories of persons who are harder to employ and therefore require additional and more intensive support. The Ministry also notes that young persons with disabilities are recognised in other public policy documents, including the Youth Strategy 2023–2030 and the Strategy for Improving the Position of Persons with Disabilities 2025–2030. However, the response also confirms that young persons with disabilities are not defined as a separate target group in employment policy,

but are mainly included within broader categories such as youth and persons with disabilities. This shows that the group is formally covered, but not fully developed as a distinct intersectional policy category.

2.3.2. Awareness and access to employment services and active labour market measures

Albania

Based on the available interview responses and short survey data, awareness and access to employment services and Active Labour Market Measures in Albania appear uneven. From the institutional side, the Employment Agency presents Active Labour Market Measures as formally available to young persons with disabilities. It states that young persons with disabilities can benefit from general employment promotion and vocational training programs, including job mediation, vocational training and employer subsidies. The Agency also notes that persons with disabilities are treated as a priority group within these measures and that registered unemployed persons with disabilities are recorded with information such as age, education and qualifications. However, the response does not clearly show whether disability-focused measures differentiate by age, whether young persons with disabilities are coded as a separate group or whether cross-tabulated data are systematically used for targeting and monitoring.

CSO responses provide a more critical picture of actual access. Across the four CSO interviews, respondents emphasize that access is formally available but limited in practice. One respondent states that access is “formally yes, but in reality limited,” because practical adaptations, especially communication access and support services, remain weak. Another respondent states that in most cases young persons with disabilities “do not have real access” to Active Labour Market Measures, especially independently. Other CSO respondents link limited access to weak implementation of existing legislation, lack of sanctions, poor accessibility, lack of information, employer resistance and insufficient adaptation of measures to the transition from education to employment. Reported barriers include inaccessible services and information, recruitment difficulties, lack of reasonable accommodation, lack of adapted vocational training, employer refusal, weak mentoring, low wages, inaccessible transport, unsuitable workplaces and physical access barriers.

Interviews with young persons with disabilities support this finding. One respondent accessed training opportunities through an organization rather than directly through the Employment Agency, and support with the process also came mainly from the organization.

Another respondent, a 28-year-old woman with Multiple Sclerosis, had no contact with any Employment Agency at all. These experiences suggest that formal availability of employment services does not necessarily translate into direct institutional outreach or independent access for young persons with disabilities.

CSOs also question whether programs lead to sustainable employment. One respondent notes that Active Labour Market Measures often support short-term or initial employment, but lack long-term follow-up and career support. Another notes that reduced support periods weaken sustainability and trust in institutions. The additional CSO interviews reinforce this concern by pointing to weak enforcement, lack of employer accountability and the absence of structured transition support as factors that limit sustainable outcomes.

North Macedonia

The findings of the research indicate that young persons with disabilities in North Macedonia have formal access to employment services and Active Labour Market Measures, but their awareness of and participation in these measures remains limited. Although institutions provide various employment support programmes, the survey and interview findings suggest that a significant proportion of young persons with disabilities either do not make use of the available opportunities or are not sufficiently informed about them.

From an institutional perspective, the Employment Agency treats persons with disabilities as a priority category within active labour market measures. According to the data provided by the Agency, as of 31 December 2025, there were 98 registered unemployed persons with disabilities aged 20–24 and 115 persons with disabilities aged 25–29, amounting to a total of 213 young persons with disabilities within these two age groups. These figures indicate that young persons with disabilities represent a significant category within the register of unemployed persons and highlight the need for stronger support for their labour market integration.

Interviews with young persons with disabilities revealed that information about available measures is obtained through various channels, including the Employment Agency, CSOs, educational institutions, family members, friends, and online sources. Nevertheless, several respondents noted that information is often insufficiently visible, unclear, or inaccessible, resulting in limited awareness of available opportunities. CSOs further emphasized the lack of a proactive approach in informing and reaching out to young persons with disabilities.

With regard to the application process, some interviewees reported that procedures are not always simple or accessible. Persons with intellectual disabilities, visual impairments, and hearing impairments particularly highlighted the need for additional support when preparing applications, gathering required documentation, and communicating with institutions. These findings suggest that the formal availability of measures does not necessarily translate into genuine accessibility for all categories of young persons with disabilities.

In addition, representatives of institutions and CSOs noted that existing measures are generally designed either for young people as a whole or for persons with disabilities as a whole, while young persons with disabilities are rarely recognized as a distinct target group with specific needs. As a result, there is a lack of measures that simultaneously address challenges related to both age and disability, which limits their potential effectiveness for this category of citizens.

Serbia

With regard to the effectiveness of active labour market measures in reaching young persons with disabilities, the Ombudsman stated that it does not have sufficient information, based on its previous work, to draw a clear conclusion. This limitation is relevant in itself, as it points to the absence of strong institutional evidence on whether existing measures effectively reach this group. While active labour market measures formally exist, the lack of specific information on their accessibility and effectiveness for young persons with disabilities suggests that further monitoring and assessment are needed, particularly from the perspective of actual access, outreach and practical use of employment services.

The Ministry of Tourism and Youth considers that existing active labour market measures contribute to greater inclusion of young persons with disabilities by providing opportunities for work experience, training and employment. However, it also acknowledges that the reach and effects of these measures are not always consistent, and that some young persons with disabilities remain insufficiently informed or face barriers in accessing available support. The Ministry also reports that employment-related institutions participate in regular reporting on the implementation of the Youth Strategy and are represented in the working group responsible for monitoring and adopting annual implementation reports. This indicates that formal coordination mechanisms exist, but the response also points to the need for better information, stronger outreach and more adapted support.

According to the Ministry of Labour, Employment, Veteran and Social Affairs, active labour market measures are available to unemployed persons registered with the NES. The Ministry

explains that outreach activities are not formally part of active labour market measures, meaning that access largely depends on whether a person is registered as unemployed. At the same time, the Ministry states that the share of unemployed persons with disabilities included in active labour market measures is higher than their share in total registered unemployment, which is presented as an indicator of intensified support for this category. Information on the participation of young persons with disabilities in specific active labour market measures is available through NES' reports. This indicates that formal access exists, but outreach and activation of those outside the register remain important challenges. On the other hand, the Ministry also states that certain active labour market measures planned until 2026 have been revised to improve their effectiveness and In addition, new measures have been introduced, including the work activation programme for persons with disabilities, as well as new support services such as individualized support for beneficiaries participating in active labour market measures.[35]

The NES noted that a dedicated budget exists for active labour market measures targeting persons with disabilities. However, the main challenge is that the allocated funding remains limited. Over the past ten years, the budget has remained at approximately 550 million euros. The Ministry of Labour has repeatedly requested an increase in funding from the Ministry of Finance, but these requests have not yet received a positive response. NES points out that implementation data show that the number of beneficiaries participating in the measures has been roughly twice as high as initially planned. According to the NES, this is largely due to efforts to maximize available funding from various sources, including project-based financing and the Service's own resources. However, an additional challenge in the current year is that the NES's internal budget has also been reduced, placing further pressure on the implementation of employment measures.The problem is also that some individuals may choose not to declare disability status, which directly affects the equitable targeting of support.

2.3.3. Transition from education to employment

Albania

The research findings suggest that transition support for young persons with disabilities in Albania is partial and not systematic. The Employment Agency states that some measures

[35] Data provided by the Ministry of Labor, Employment, Veteran and Social Affairs in response to an access to public information request.

include practical training, such as “training through work” and “learning the profession in the workplace,” and that unemployed jobseekers can access free vocational training . However, this remains general and does not show a dedicated transition pathway for young persons with disabilities. The Agency also acknowledges that access and adaptation remain challenging, especially “in the transition from education to the labor market”.

CSOs are more critical. One respondent notes that existing programs include some transition elements, but are “not designed specifically for young persons with disabilities”. Another states that many young persons with disabilities finish education without feeling prepared for the labor market. The additional CSO interviews reinforce this finding, describing the transition from education to employment as largely uncovered and arguing that current employment measures are not sufficiently adapted to this stage. Reported gaps include weak career guidance, lack of individualized mentoring, limited reasonable accommodation, insufficient job coaching, inaccessible vocational training and weak employer mediation.

Youth interview evidence points in the same direction. One respondent had participated in training activities, but these did not directly lead to employment or appear to form part of a structured transition pathway. Another respondent, a 28-year-old woman with Multiple Sclerosis, had no contact with any Employment Agency, which means there was no evidence of institutional career guidance, referral to training or support in moving toward employment. The short survey also provides limited indicative context, as it asked whether respondents had participated in employment programs such as training, internships, wage subsidies, the Youth Guarantee or similar measures. However, it should be used cautiously here, since it shows connection to possible transition-related programs rather than directly measuring transition support.

Overall, transition support appears to depend more on individual initiative, family support or Civil Society Organization/project-based assistance than on a stable institutional pathway. The Employment Agency response does not directly address mechanisms for tracking education-to-work transition, database links with education, social protection or disability assessment systems, or barriers to longitudinal tracking. No responses were available from the Ministry of Labour or the Ministry responsible for Youth on this issue.

North Macedonia

The research findings indicate that the transition from education to employment represents one of the greatest challenges for young persons with disabilities in North Macedonia. A large number of CSOs working with persons with disabilities, as well as young persons with

disabilities themselves, believe that this process is insufficiently structured and that institutional support remains limited. Particular emphasis is placed on the lack of career counselling and vocational guidance tailored to the needs of young persons with disabilities. According to the respondents, young people often do not receive sufficient support to recognize their own abilities, interests, and potential, nor are they provided with guidance regarding the professions they could pursue. The lack of individualized counselling affects their educational choices, further professional development, and employment opportunities.

During the research, it was highlighted that interruption or limitation of education represents a significant issue among young persons with disabilities. Although in North Macedonia, students with disabilities in primary education are provided with support through personal assistants, and such support is envisaged for secondary education starting from the 2025/2026 academic year, young persons with disabilities who continue into higher education still do not have systematically provided professional and assistive support in the learning process. This issue was particularly emphasized by young persons with visual impairments, who pointed out that the literature they need for their studies is often not available in audio format or other accessible forms. The lack of accessible educational materials creates additional difficulties in the studying process, which for some young people leads to demotivation to continue their education after secondary school and to decisions not to enrol in higher education.

Additionally, the relevant institutions covered with the research highlighted that the country lacks mechanisms for monitoring the transition of persons with disabilities from secondary to higher education. It was noted that there is limited information regarding whether young persons with disabilities who complete secondary education, particularly those following individualized educational programmes, are adequately prepared to continue into higher education. Interviewees questioned whether students with intellectual disabilities who achieve strong academic performance in secondary education receive sufficient guidance and support when considering higher education pathways, especially in study programmes with demanding academic requirements. According to institutional representatives, there is a need for more systematic monitoring of the educational trajectories of young persons with disabilities, as well as stronger mechanisms for career guidance and support to help them make informed educational and professional choices.

In addition to the challenges related to formal education, young persons with disabilities also point to the lack of practical work, internships, and opportunities to gain work experience. Some respondents emphasized that despite obtaining an education, they do not have

sufficient opportunities to apply their knowledge and skills in a real working environment. This further complicates their transition into the labour market and affects their self-confidence and competitiveness in employment.

Based on the responses obtained, it can be concluded that the professional development and successful transition to employment of young persons with disabilities largely depend on their personal efforts and the support they receive from their families, rather than on systematically and institutionally provided mechanisms. Although there have been certain positive developments in the area of educational inclusion, the research shows that support during the transition from education to employment remains insufficiently developed and insufficiently adapted to the specific needs of young persons with disabilities.

Serbia

Interviews with institutions, young persons with disabilities and survey findings indicate that support during the transition from education to employment remains insufficiently developed in Serbia. The interviews with young persons with disabilities and CSOs show that one of the main problems in this transition is the lack of information. Young persons with disabilities are often not familiar with the next steps they should take after completing education. Even when they are registered with the National Employment Agency, the quality and individualisation of support depends largely on the assigned career adviser.

The interviews also indicate that there are no clear mechanisms to systematically track or support the transition from education to employment. This is also reflected in the responses to requests for information. The Commissioner for Equality, the human rights expert and CSOs stated that existing measures are not sufficiently adapted to respond to the transition from education to the labour market, and that a much stronger connection is needed between the education system and labour market needs. From the perspective of CSOs, for many young persons with disabilities, employment measures are the only way to gain work experience or access employment opportunities. However, work activation and public works programmes are often short-lived, which limits their long-term impact.

Interviewed young persons with disabilities stated that they did not receive professional guidance or career counselling. According to respondents, young people often do not receive sufficient support to recognise their own abilities, interests and potential, nor are they provided with guidance regarding the professions they could pursue. CSOs in Serbia also emphasized that adequate career counselling is lacking. Although formal career counselling teams exist in high schools and universities, in practice, such support is often not available.

After finishing high school, young people are frequently left to manage the transition on their own.

Another issue highlighted by CSOs is the mismatch between the education system and the labour market. For example, a person may graduate with formal knowledge for working in a call centre, but the training may be based on outdated models, such as old-fashioned call centres with cables and manual connections. As a result, they may lack the knowledge and skills needed to work in a modern call centre, despite being formally educated for this type of work. In such cases, retraining and additional training are necessary, but these opportunities are not available in sufficient measure. Current measures therefore do not reach a sufficient number of young persons with disabilities.

The Ombudsman also noted that it does not have sufficient information to assess whether employment measures are adapted to support the transition of young persons with disabilities from education to work. This indicates an important evidence gap regarding one of the most sensitive stages in the employment pathway. The absence of clear institutional conclusions on this issue suggests that transition support is not systematically monitored from the perspective of the Ombudsman's work. In the research, this finding should be complemented with evidence from young persons with disabilities, CSOs and employment institutions, particularly regarding career counselling, internships, practical training and first work experience.

The Ministry of Tourism and Youth recognises the transition from education to employment as an area where further improvement is needed. The Ministry notes that employment measures to some extent address the need to support young persons with disabilities during this transition through professional practice, training, career guidance and employment incentives. However, it also emphasizes that these measures should be further adapted to the individual needs of young persons with disabilities. Stronger cooperation between education institutions, employment services and employers is identified as important for ensuring more continuous support and easier labour market inclusion.

The Ministry of Labour, Employment, Veteran and Social Affairs considers that certain employment measures, especially those related to additional education and training, are designed to support a timely, efficient and sustainable transition from education to work. However, the response also highlights that successful transition depends on the type and level of education, acquired knowledge and skills, and the specific needs of employers. The Ministry identifies an unfavourable education structure among unemployed persons with disabilities as one of the main barriers to employment, particularly the high share of persons

without qualifications or with low qualifications. It also stresses the need to introduce new qualifications and educational profiles in schools attended by persons with disabilities, in line with labour market demand.

On the other hand, National Employment Agency emphasises that there are active labour measures meant for transition from education to work- internship measure i professional practice measure.Traineeship and work placement programmes, available for individuals with secondary and higher education qualifications, are designed to provide the knowledge and skills necessary for a specific job position. There are also employment support services, such as active job search measures, which help individuals learn how to present themselves to employers, prepare an effective resume, and improve their job application skills. In addition, there is also self-efficacy training, where psychologists may be involved when more intensive support is needed. Key challenges include family overprotection and excessive concern, insufficient awareness among young people about available opportunities, and lack of interest among some young people to engage in such programmes and services.

2.3.4. Employment outcomes and job sustainability

Albania

The findings for Albania indicate that employment outcomes among young persons with disabilities remain uneven and insufficiently monitored. Survey findings, institutional responses, interviews with young persons with disabilities and civil society organization interviews all suggest that existing employment measures have limited evidence of producing stable and sustained employment.

The Albania survey provides the clearest indicative evidence on current employment status and programme outcomes. Among 20 respondents, 7 reported being employed, 7 were unemployed and actively looking for work, 3 were in education or training, 2 were unemployed and not actively looking for work, and 1 gave a mixed response. This shows that the surveyed group includes both young persons already in employment and a substantial share who remain outside stable employment.

Participation in employment-related programmes was also limited. Twelve respondents reported that they had not participated in any employment programme, while 7 reported participation and 1 response was unclear. Among respondents who clearly reported participation in an employment programme, 2 stated that the programme did not lead to

employment, 4 reported temporary employment and 1 reported permanent employment. Because this calculation is based on only 7 confirmed programme participants, the findings should be interpreted as indicative rather than conclusive. Although these results should be interpreted cautiously because of the small sample size and some inconsistency between participation and outcome answers, they suggest that participation in employment measures does not consistently lead to stable or permanent employment. The survey also does not provide detailed information on the timing and quality of employment outcomes. It does not show whether employment was obtained within 0–3 months, 3–6 months, 6–12 months or after one year. It also does not include detailed information on contract type, full-time or part-time status, wage level, working hours or whether employment was retained after programme support ended. Therefore, the survey is useful for identifying broad patterns, but it cannot fully assess job quality or long-term sustainability.

From the institutional side, the Employment Agency presents vocational training, job mediation and employer subsidies as available measures for young persons with disabilities. However, the response does not provide detailed evidence on whether outcomes are monitored after programme completion, whether employment continues after subsidies expire, or whether employers discontinue employment once financial support ends. Official administrative systems record registered jobseekers, disability status, participation in active labour market measures and reported placements, but publicly available data do not routinely provide cross-disaggregation, post-programme employment status by age and disability, job retention, contract type or wage information. This limits the possibility of assessing sustainable employment outcomes specifically for young persons with disabilities. Broader official data sources also remain insufficient for this purpose. Census data and other published statistics provide some information on disability prevalence and labour market status, but they do not capture employment transitions, retention, workplace accommodation, programme participation or post-programme outcomes for young persons with disabilities. As a result, Albania lacks regularly published indicators that would allow systematic assessment of whether young persons with disabilities move from employment measures into stable and decent work.

Interviews with young persons with disabilities help illustrate these limitations. One interviewed young person had participated in training activities, but the programme did not directly lead to employment and there was no clear evidence of institutional follow-up after participation. Another respondent, a 28-year-old woman with Multiple Sclerosis, had no contact with any Employment Agency, meaning that her employment pathway would not

be captured through formal employment-service monitoring. These cases suggest that even when support exists, it may not be connected to sustained employment outcomes or systematic tracking. Civil society organization interviews also question the sustainability of current measures. Respondents noted that Active Labour Market Measures often support short-term or initial employment, but lack long-term follow-up, career support and employer accountability. They also linked weak employment outcomes to poor implementation of existing legislation, limited sanctions, employer resistance, lack of workplace adaptation and the absence of structured transition support from education to employment.

Overall, the Albania findings suggest that employment outcomes and job sustainability remain weakly evidenced and uneven in practice. The survey points to limited programme participation, frequent non-employment after programme participation and very few reports of permanent employment. Institutional and official data show that outcome monitoring remains insufficiently disaggregated and does not provide enough information on retention or job quality. Interviews with young persons with disabilities and CSOs reinforce the same conclusion: the key issue is not only whether young persons with disabilities enter employment programmes, but whether these programmes lead to stable, decent and retained employment after support ends.

North Macedonia

The findings of the research indicate that employment outcomes among young persons with disabilities in North Macedonia vary considerably and are influenced by the type of support received, workplace conditions, employer attitudes, and the availability of follow-up support after employment. Survey findings, institutional data, and interviews with young persons with disabilities and CSOs provide insight into both the effectiveness and the limitations of existing employment measures.

The institutional data provided by the Employment Agency offer a broader overview of employment outcomes related to active labour market measures between 2021 and 2025. It is important to note that these data refer to all persons with disabilities and not specifically to young persons with disabilities, as no disaggregated data on programme participation and outcomes for young persons with disabilities were made available. According to the Employment Agency data, a total of 434 persons with disabilities participated in active labour market measures during the period 2021–2025. Participation remained relatively stable between 2021 and 2023, with 99 participants in 2021, 101 in 2022 and 96 in 2023, before declining to 65 participants in 2024 and increasing slightly to 73 participants in 2025.

The most frequently used measures throughout the observed period were public works programmes, self-employment support and subsidized employment measures.
A comparison of programme outcomes suggests that self-employment measures generated the strongest employment results. In several years, nearly all participants who received self-employment support remained employed after programme completion. In 2025, for example, 18 persons with disabilities participated in self-employment measures and all 18 were recorded as employed six months after participation. Similar results were observed in previous years, indicating that self-employment support may contribute to more sustainable employment outcomes than several other available measures.
Positive outcomes were also recorded for subsidized employment measures and the programme "Employment and Growth of Legal Entities." In 2025, 16 persons with disabilities participated in this measure, of whom 12 remained employed six months after programme completion. These findings suggest that measures directly linked to job creation and employer incentives tend to achieve more sustainable employment outcomes than measures primarily focused on temporary labour market activation. By contrast, measures such as public works, community work programmes, internships and certain training activities appear to have more limited long-term employment effects. Although public works consistently recorded the highest or among the highest numbers of participants, the proportion of participants who remained employed after programme completion was considerably lower. In 2025, 26 persons with disabilities participated in public works programmes, while only one participant was recorded as employed within twelve months after programme completion and one participant remained employed six months after completion. This suggests that public works programmes function primarily as short-term activation measures rather than pathways to sustainable labour market integration.
Similarly, internships and vocational training programmes demonstrated relatively modest employment outcomes. In 2025, only one person with a disability participated in an internship programme, with no recorded employment outcome following completion. Training programmes for in-demand occupations involved five participants, of whom only one secured employment within twelve months. While such programmes may contribute to skills development, the available data suggest that their effectiveness depends largely on the extent to which they are linked to actual labour market demand and subsequent employment opportunities.
The data on the implementation of Employment Agency funds for supporting persons with disabilities further illustrate variations in programme utilization. In 2021, measures were

planned for 210 persons with disabilities, while 157 persons were ultimately included, with a budget implementation rate of 82.8%. In 2022, 137 persons participated out of a planned 200, with a budget implementation rate of 76.2%. In 2023, despite the highest planned coverage of 300 persons, only 130 participants were included, while the implementation rate reached 36.6%. In 2024, 101 persons participated out of a planned 150, with implementation reaching 41.4%. In 2025, 80 persons participated out of a planned 150, while budget implementation reached 85.9%. These fluctuations suggest that planned coverage and actual utilization do not always correspond, and that programme implementation varies considerably across years.

Interviews with young persons with disabilities indicate that sustaining employment often remains a challenge even after securing a job. Respondents frequently emphasized that employer attitudes represent one of the key factors affecting job retention. Several interviewees reported that some employers appear primarily interested in accessing financial incentives associated with employing persons with disabilities rather than investing in their long-term inclusion and professional development. As a result, employment may become less stable once the initial period of support ends.

Participants also highlighted the lack of continued support after employment, particularly in relation to workplace assistance, mentoring, adaptation of work tasks and individualized support. According to several respondents, maintaining employment often depends on personal resilience, family support and the willingness of employers to accommodate their needs rather than on systematic institutional follow-up.

CSOs similarly noted that many programmes lead to short-term employment or temporary labour market participation rather than long-term and sustainable employment. According to their assessments, financial incentives alone are insufficient to ensure lasting employment outcomes. They emphasized the importance of individualized assessment of work capacity, workplace accommodation, post-placement support and systematic monitoring of employment outcomes in order to improve the sustainability of employment for persons with disabilities.

Serbia

The Commissioner for Equality emphasizes that one of the most noticeable issues is the presence of public works projects that lead to employment for only a few months, or six months at most, without any further steps. This, according to the Commissioner, points to the limited effect of this measure. The Republic of Serbia, both under the Employment Act

and the Budget Act, is obliged to implement active employment policy measures. This obligation is fulfilled through the allocation of funds into the employment budget fund, but this does not necessarily represent a consistent application of the law. The Commissioner also points out that some measures adopted several years ago are still being applied, although they are not adapted to the current labour market. Active employment policy measures should therefore follow and respond to actual labour market conditions.

Interviews with institutions indicate that employment outcomes are monitored six months after programme completion. However, the interviews with young persons with disabilities suggest that participation in employment services does not always lead to appropriate employment. In Serbia, the interviewed young persons with disabilities stated that they did not obtain employment through the NES. This issue was particularly emphasized by a young person with a physical disability, who explained that the jobs offered by the NES were not suitable for him, including jobs that required carrying heavy items despite his physical disability.

The Ombudsman's response does not provide detailed information on employment outcomes, job retention or the long-term sustainability of employment programmes for young persons with disabilities. However, the institution does refer more broadly to complaints related to the right to employment, professional rehabilitation, job security and adapted working conditions. This suggests that employment outcomes should not be assessed only through participation in programmes, but also through the stability and quality of employment, the availability of reasonable accommodation and the extent to which persons with disabilities are able to maintain employment under appropriate conditions.

The Ministry of Tourism and Youth presents active labour market measures as relevant for improving employability and supporting labour market inclusion, particularly through work experience, training and employment-related programmes. However, its response does not provide detailed information on whether these measures lead to sustainable employment, long-term retention or stable job outcomes for young persons with disabilities. This means that the Ministry's contribution is more useful for understanding formal availability and policy intentions than for assessing the actual effectiveness of programmes in producing durable employment outcomes.

The Ministry of Labour, Employment, Veteran and Social Affairs provides important information on the monitoring of employment outcomes. It states that the monitoring framework includes both output-oriented and impact-oriented approaches. In particular, the effectiveness of financial employment measures is assessed through an indicator measuring

the share of participants employed on the 180th day after exiting the measure or completing the contractual obligation. This indicator can be disaggregated for different categories of harder-to-employ persons, including young people and persons with disabilities. The Ministry also notes that independent evaluations are conducted, including external evaluations of specific active labour market measures. This makes the Ministry's response particularly relevant for assessing whether programmes are monitored beyond participation numbers and whether employment outcomes are tracked over time.

The NES highlighted that ensuring the sustainability of employment remains a challenge, particularly for individuals who have been unemployed or inactive for a long period and may withdraw after entering a labour market measure. To address this issue, a mentoring support service was introduced through the Employment Strategy Action Plan. Initially piloted in the local branches of Pančevo, Požarevac, Jagodina, and Pirot, the programme provided additional support to help beneficiaries adjust to workplace routines, hierarchies, and responsibilities, producing positive results. The service was primarily aimed at the long-term unemployed and could also be provided at the request of employers. It is intended to become a permanent measure, although its wider implementation depends on available staffing and resources. The NES also noted that monitoring longer-term employment quality and sustainability would require stronger data integration, particularly with the Tax Administration.

2.3.5. Barriers to employment

Albania.

Young persons with disabilities in Albania face multiple barriers when accessing employment. These barriers appear before, during and after contact with employment services: in access to information, institutional support, accessibility, skills development, employer attitudes and personal or social circumstances. Survey findings, youth interviews, civil society organization interviews and the Employment Agency response suggest that the main issue is not only the formal existence of employment measures, but whether young persons with disabilities can access and use them in practice.

Information barriers: Lack of information appears as a barrier, although it is not the most frequently selected survey response. In the survey, 1 out of 20 respondents identified lack of information as the biggest challenge in finding work. However, broader survey answers show that access to guidance is weak. Only 1 respondent reported receiving career guidance

regularly, while 8 received it sometimes, 6 rarely and 5 never. Youth interview evidence supports this finding. One respondent accessed training through an organization rather than directly through the Employment Agency, while another had no contact with the Employment Agency at all. This suggests that information about employment measures, rights and services is not reaching all young persons with disabilities through systematic institutional channels.Administrative and institutional barriers: The Employment Agency presents vocational training, job mediation and employer subsidies as formally available to young persons with disabilities. However, the available evidence does not show that these measures are consistently individualized according to age, disability type or support needs. Survey findings also point to this limitation: 17 respondents considered employment programmes only partially designed and adapted for young persons with disabilities, while 3 said they were not adapted. CSOs similarly identify weak implementation, unclear institutional responsibilities, limited outreach and lack of sanctions as major barriers. These findings suggest that institutional access exists formally, but remains uneven in practice.

Accessibility barriers: Accessibility is one of the clearest barriers in the Albania findings. In the survey, 3 respondents identified workplace accessibility as the biggest challenge in finding work, while 4 identified lack of adapted support. Employer provision of accommodation also appears weak: only 1 respondent said that employers usually provide necessary accommodations, while 8 said this happens sometimes, 7 rarely and 4 never. Civil society organization interviews reinforce this finding by pointing to inaccessible workplaces, public buildings, transport, sidewalks, services, information and communication. Accessibility therefore goes beyond physical entry into a workplace; it also includes transport, communication, adapted materials, support services and the practical ability to participate equally in training, recruitment and employment.Education, skills and work experience barriers: Survey findings show that 3 respondents identified lack of work experience as their biggest challenge, while 1 identified mismatch between education and labour market needs. These barriers are also reflected in interview evidence. CSOs note that the transition from education to employment is weakly supported and that existing training measures are often not sufficiently adapted to young persons with disabilities. The Employment Agency refers to vocational training and workplace-based learning, but the evidence does not show a structured pathway linking schools, vocational training centres, employment services and employers. As a result, young persons with disabilities may leave education without practical experience, adapted training or clear career guidance.

Employer-related barriers: Employer attitudes are the most frequently reported barrier in the survey. Five respondents identified employer attitudes as their biggest challenge in finding work. This is consistent with civil society organization interviews, which refer to prejudice, low expectations, reluctance to provide accommodation and limited willingness to invest in training or adaptation. Some CSO respondents also note that employers may reject young persons with disabilities indirectly, for example by claiming that they lack required skills rather than considering reasonable accommodation or workplace adjustment. These findings suggest that employer resistance remains a central barrier, even where employment measures or subsidies formally exist.Personal and social barriers: Some barriers are linked to individual and social circumstances, but these should not be interpreted as personal failure. In the survey, 3 respondents identified health-related limitations as their biggest challenge in finding work. Interviews and CSO responses also suggest that confidence, family dependence, limited networks and lack of rights awareness can affect employment access. These barriers are shaped by previous exclusion, weak institutional support and inaccessible services. For this reason, personal and social barriers should be addressed through counselling, peer support, rights information, family engagement where appropriate and stronger institutional outreach.

Overall, the Albania findings show that employment barriers are interconnected. Employer attitudes, weak accommodation, limited adapted support, insufficient guidance, accessibility problems and weak institutional outreach reinforce one another. While formal employment measures exist, the evidence suggests that young persons with disabilities still face practical barriers in accessing information, receiving individualized support, reaching workplaces, gaining experience and being treated as capable jobseekers by employers.

North Macedonia

Young persons with disabilities face multiple interconnected barriers when accessing the labour market. These barriers appear at different stages of the employment process, from obtaining information about employment opportunities and Active Labour Market Measures, through education and gaining work experience, to securing and maintaining employment.

Information barriers: Lack of information is one of the barriers faced by young persons with disabilities. In the survey, 12.7% of respondents identified insufficient information as one of the main challenges in finding employment. During the interviews, several young persons stated that they were not sufficiently informed about available measures, programmes and

employment-related rights. The Employment Agency expressed a similar view, emphasizing that young persons with disabilities are not adequately informed about opportunities available through Active Labour Market Measures. The research also shows that many young persons obtain information through CSOs, educational institutions, family members and friends, rather than through systematic institutional mechanisms for information dissemination and career guidance.

Administrative and institutional barriers: Although institutions provide access to Active Labour Market Measures, some respondents indicated that procedures related to registration, documentation and access to services are not always simple or sufficiently adapted to the needs of persons with disabilities. The interviews also revealed a lack of individualized approaches that take into account different types of disabilities and the specific needs of young persons.

In addition, institutional coordination remains insufficiently developed, while the absence of integrated monitoring systems makes it more difficult to provide continuous support during the transition from education to employment.

Accessibility barriers: Accessibility remains one of the most significant challenges. In the survey, 18.2% of respondents identified workplace accessibility as one of the main barriers to finding employment, while 41.8% reported that the lack of adapted support is the greatest challenge.

CSOs and young persons with disabilities emphasized that accessibility goes beyond physical access to workplaces. It also includes access to information, communication, transportation, digital tools, assistive technologies and support services. The lack of reasonable accommodation and individualized support continues to limit equal participation in the labour market.

Education, skills and work experience barriers: The lack of work experience represents an important obstacle for many young persons with disabilities. In the survey, 9.1% of respondents identified insufficient work experience as their greatest challenge in finding employment, while 12.7% reported a mismatch between their education and labour market requirements. During the interviews, young persons with disabilities often emphasized that the education system does not provide sufficient practical preparation for entering the labour market. Limited internships, practical training opportunities and first work experience further reduce their competitiveness when applying for jobs. CSOs also noted that existing training programmes are not always sufficiently adapted to different types of disabilities and individual needs.

Employer-related barriers: Employer attitudes emerged as one of the most prominent barriers. In the survey, 29.1% of respondents identified employer attitudes as the greatest challenge in finding employment. CSOs also pointed to the persistence of prejudice, low expectations and limited willingness among some employers to provide reasonable accommodation. The Employment Agency also identified mistrust as a key barrier, both among employers and within the system itself. This points to the need to strengthen confidence in the abilities and potential of young persons with disabilities and to raise awareness among employers about the benefits of inclusive employment.

Personal and social barriers: Some respondents also highlighted personal and social factors affecting their employability. In the survey, 21.8% reported that limitations related to their health condition represent a significant barrier when seeking employment. Individual respondents also referred to fears related to frequent health-related absences, feelings that suitable jobs are unavailable to them, and insecurity resulting from previous negative labour market experiences. Some responses also pointed to the instability of employment opportunities. For example, one respondent reported that their employment ended after the expiration of state financial incentives provided to the employer. Although such cases were not frequently reported, they illustrate the vulnerability of some young persons with disabilities and the need for greater sustainability of employment measures.

Serbia

On the topic of main barriers, the Commissioner for Equality considers accessibility to be the biggest obstacle. Accessibility is seen as a general barrier to the exercise of any other right. If a person does not have access to public transportation or accessible streets, they cannot properly travel from home to work, which represents a major obstacle. For persons who use wheelchairs or have mobility difficulties, not being able to use a bus means that they can only compete for jobs they can reach on foot. In the Commissioner's view, this significantly narrows the labour market available to them.

The Commissioner also notes that there is no structural discrimination in regulations and laws, and that the legal framework is extremely clear. The problem lies in the fact that measures adopted many years ago are still being applied, although they are not adapted to the current labour market. Active employment policy measures must keep pace with labour market conditions. Interviews with the Commissioner for Equality and the human rights expert show that laws themselves are not discriminatory, but that inconsistent application of

laws and regulations can lead to discrimination or produce effects that resemble discrimination.

In the Commissioner's opinion, intersectional discrimination is sufficiently regulated. Whether a case is classified as intersectional discrimination or discrimination is, in their view, a theoretical distinction that does not have much practical significance. The main difficulty lies in data collection and proof. For example, it is difficult to determine whether only young persons with disabilities were discriminated against, and not older persons with disabilities. It is also difficult to prove that young people were discriminated against compared to older people. The challenge is to establish why an employer did not hire someone — whether because of gender, age, disability, or another personal characteristic. Therefore, the problem lies in collecting and analysing data, as well as identifying the specific personal characteristic that served as the basis for discrimination. A special report on the situation of persons with disabilities provides a number of recommendations to public authorities, including specific recommendations in the area of work and employment. One of the tasks of one of the Commissioner's sectors is the continuous training of employers. During the research period, the Commissioner held a series of meetings with different types of employers, focusing on equality partnerships and the equality code.

CSOs are seen as an invaluable source of information and ideas on how to overcome certain problems, particularly regarding what is needed to improve the transition from education to employment. They have the capacity to support both the private and public sectors, the NES and other institutions responsible for these tasks. From the perspective of CSOs in Serbia, it is not simply a question of whether young persons with disabilities disclose their disability or not; this depends on the employer, and the situation varies. Larger employers are generally more open. Some employers are open because of human resources sensitivity, while others want to be inclusive but do not know how. The problem is often a lack of knowledge and insufficient understanding when communicating with human resources departments. In HR, there is often fear about how to conduct the conversation and how to approach the issue, with employers assuming that the process is much more complicated than it actually is. According to CSOs, training is needed for employers and managers at all levels, along with increased sensitivity.

According to the Ombudsman, complaints received from persons with disabilities in relation to the right to work most often concern employment and professional rehabilitation, job security, adapted working conditions and insufficient accessibility. Accessibility barriers include not only architectural obstacles, but also information and communication barriers.

These issues are directly relevant for young persons with disabilities, as they can affect access to employment services, participation in programmes, communication with institutions and employers, and the ability to work under equal conditions. The findings point to a combination of legal, institutional, practical and accessibility-related barriers that continue to shape access to employment.

Interviews with young persons with disabilities in Serbia show that the biggest challenge is, first, employer attitudes, followed by lack of information. They reported feeling discriminated against based on age, because employers often require several years of experience, and based on disability. They also stated that they are not sufficiently aware of their rights, because no one informed or educated them about these rights. All interviewed young persons with disabilities were or are registered with the National Employment Agency.

The Ministry of Tourism and Youth identifies several key barriers faced by young persons with disabilities in accessing employment. These include the lack of accessible workplaces, as some working environments and infrastructure are not adapted to different types of disabilities. Employer assumptions and prejudices are also highlighted, particularly scepticism regarding the abilities and productivity of persons with disabilities. In addition, the Ministry points to limited information and support, as young people are sometimes insufficiently informed about available measures, training programmes and employment opportunities. Insufficient preparation during education, including limited professional orientation and practical experience, is also recognised as a barrier to the transition from education to the labour market.

The Ministry of Labour, Employment, Veteran and Social Affairs identifies two major barriers affecting the employment of young persons with disabilities. The first is the unfavourable educational structure of unemployed persons with disabilities, including a significant share of persons without qualifications or with low levels of qualification. The second is the need to introduce new qualifications and educational profiles in schools attended by persons with disabilities, especially those for which there is demand in the labour market. These barriers suggest that employment difficulties are closely connected to the education system and the mismatch between existing skills and labour market needs. The response therefore points to the importance of reforming both formal and non-formal education pathways.

The NES notes that there are many barriers, but some of the most significant can be highlighted. The Law on Professional Rehabilitation and Employment of Persons with

Disabilities has brought progress in improving the position of persons with disabilities. However, despite this and despite all the promotional activities carried out by the NES, employers remain reluctant, and various forms of prejudice still persist. Another barrier is the overprotectiveness often present in the individual's environment, particularly within the family. The NES strives, through its activities and outreach campaigns conducted across its local branches, to present itself as a partner to young people. Nevertheless, a lack of trust in the NES as an institution continues to exist. Transportation and mobility issues can also be identified as significant barriers for persons with disabilities. A small budget is also one of the barriers because it affects how many people will be included in measures.

2.3.6. Discrimination, equal treatment and rights awareness

Albania

The interviews with youth suggest that discrimination during job applications is a significant concern for young persons with disabilities, although direct experiences varied between respondents. One interviewed young person did not describe being directly asked about disability during recruitment, but still identified employer attitudes and disability-related barriers as relevant factors affecting access to employment. Another respondent, who had no contact with any Employment Agency, had no clear institutional pathway for receiving information on employment rights, available support or reasonable accommodation. This suggests that awareness of rights depends heavily on whether young persons are reached by institutions, CSOs or other support networks, rather than being guaranteed through a systematic public employment pathway.

Civil Society Organization interviews describe discrimination more structurally. Respondents identify employer prejudice, low expectations, lack of information, inaccessible workplaces and reluctance to provide training or accommodation as recurring barriers. One CSO respondent noted that employers may reject persons with disabilities indirectly, by saying they lack the required skills instead of offering training, adaptation or reasonable accommodation. CSOs also emphasize that weak implementation of existing legislation and the lack of effective sanctions reduce the practical value of anti-discrimination safeguards. Based on the obtained data, the main issue appears to be the gap between formal anti-discrimination rights and practical enforcement in recruitment, reasonable accommodation and workplace inclusion. While rights may exist in law, the

interviews suggest that young persons with disabilities may still depend on individual employers, CSO support or personal networks to make those rights meaningful in practice.

North Macedonia

The research findings indicate that discrimination remains a significant challenge for young persons with disabilities when accessing the labour market. Although the legal framework in North Macedonia guarantees the principles of equality, non-discrimination and reasonable accommodation, the experiences of young persons with disabilities demonstrate that they continue to face various forms of unequal treatment throughout the employment process. CSOs working in the disability sector emphasized that discrimination most often does not take the form of direct refusal to hire a person. Instead, it is reflected through lower expectations from employers, limited opportunities for professional advancement, insufficient willingness to provide reasonable accommodation, and assumptions that persons with disabilities are less productive or represent an additional financial burden for employers. Similar experiences were reported by young persons with disabilities during the interviews, where participants noted that employers often focus on their disability rather than on their qualifications, knowledge and ability to perform job-related tasks. Regarding institutional protection against discrimination, data provided by the Ombudsman show that a total of eight complaints related to persons with disabilities were submitted between 2021 and 2025, four of which concerned young persons with disabilities. The Ombudsman noted that not all complainants indicate their age, meaning that the actual number of complaints submitted by young persons with disabilities may be higher. A particularly important case involved a person with autism who filed a complaint after being unable to secure employment in a sheltered company. Although the employer was willing to hire the individual, autism was not explicitly covered by the former Law on Employment of Disabled Persons from 2000, preventing the employer from accessing the benefits intended for workplace adaptation and employment support. Following an initiative submitted by the Ombudsman, persons with autism were explicitly included in the legal framework in 2025. This case illustrates how certain forms of discrimination may arise from the legal framework itself when specific groups are not adequately recognized in legislation. The Ombudsman further noted that many complaints submitted by persons with disabilities were either unfounded or outside the institution’s competence. According to their observations, a significant number of persons with disabilities do not clearly recognize what constitutes discrimination and are not sufficiently familiar with the available protection

mechanisms. This finding points to the need for additional education and awareness-raising regarding employment rights and anti-discrimination protection mechanisms. Data provided by the Commission for Prevention and Protection against Discrimination show that the Commission maintains statistical records by age, ground and area of discrimination and is able to generate cross-tabulated reports. In the area of employment and labour relations, a total of 15 complaints based on disability were submitted between 2021 and 2025. The number of complaints increased in 2024, when six complaints were submitted, while four complaints were recorded in 2025. The Commission also identified cases in which age and disability appeared as combined grounds for potential discrimination in employment. Regarding the outcomes of complaints, some cases resulted in findings of discrimination, while others were assessed as unfounded. Certain proceedings were discontinued, and some complaints were dismissed due to lack of jurisdiction or other procedural reasons. Nevertheless, the number of formally reported cases remains relatively low compared to the survey findings, where a substantial proportion of respondents reported experiencing discrimination. This discrepancy may indicate insufficient awareness of protection mechanisms, lack of trust in institutions, or reluctance to initiate formal complaint procedures.

In terms of rights awareness, the interviews revealed varying levels of knowledge regarding the right to reasonable accommodation and available protection mechanisms against discrimination. Some young persons with disabilities reported learning about their rights through CSOs, while others stated that they were not sufficiently informed about the options available if they encountered discrimination during recruitment or in the workplace.

Serbia

CSOs emphasized that the issue of discrimination in employment cannot be reduced only to the question of whether young persons with disabilities disclose their disability or not. According to their view, the situation depends largely on the employer. Larger employers are generally more open, while some employers demonstrate openness because of greater human resources sensitivity. Others may be willing to employ persons with disabilities but do not know how to approach the process in practice. A key problem is the lack of knowledge and insufficient understanding within human resources departments. HR staff may often feel uncertain about how to conduct interviews or communicate with candidates with disabilities, assuming that the process is much more complicated than it actually is. For

this reason, CSOs emphasized the need for training employers and managers at all levels, as well as increasing their sensitivity and understanding of disability inclusion.

CSOs also identified several priority reforms related to equal treatment and labour market inclusion. These include reforming the work capacity assessment system, strengthening psychosocial support, establishing multiple work centres, improving budget allocation, ensuring uniform decision-making by work capacity assessment committees, increasing incentives for employers, introducing a more individualised approach, simplifying procedures for employers to obtain funds for workplace adaptation, and shortening the approval process for incentives. In this context, CSOs can play an important role by connecting stakeholders, exchanging information, networking, strengthening unity among organisations, empowering organisations to write project proposals, and forming a network of CSOs of persons with disabilities.

The Ombudsman's response clarifies that complaints related specifically to discrimination fall primarily within the mandate of the Commissioner for the Protection of Equality. At the same time, the Ombudsman identified the protection of labour rights and support for the employment of persons with disabilities as one of its priorities. This is relevant for the research because discrimination in employment may not always appear only as a formal discrimination complaint, but also through unequal access to employment support, inadequate reasonable accommodation, inaccessible procedures or weak institutional response. The findings therefore point to the need for accessible complaint mechanisms, stronger awareness of rights and better institutional coordination in addressing unequal treatment.

Although the Ministry of Tourism and Youth's response does not directly address discrimination complaints or protection mechanisms, it recognises employer prejudice and the need to ensure equal opportunities for young persons with disabilities. The emphasis on limited information, insufficient support and negative assumptions by employers suggests that unequal treatment may occur not only through formal discrimination, but also through practical barriers, lack of accessibility and weak awareness of the capacities of young persons with disabilities. This points to the importance of strengthening rights awareness, inclusive recruitment practices and employer sensitivity.

The response of the Ministry of Labour, Employment, Veteran and Social Affairs does not focus directly on discrimination complaints or individual cases of unequal treatment. However, it notes that the legislative framework relevant to employment is based on the principles of non-discrimination and affirmative action toward categories of persons who

are harder to employ. This is important for understanding the formal legal basis for equal access to employment measures. At the same time, the lack of more detailed information on discrimination, rights awareness or complaint mechanisms suggests that this section should be complemented with findings from the Commissioner for Equality, the Ombudsman, CSOs and young persons with disabilities.

Data provided by the Commissioner for Equality show that the Commissioner maintains statistical records by age, ground and area of discrimination. In the area of employment and labour relations, a total of 78 complaints based on disability, and 69 complaints based on age. were submitted between 2021 and 2025. They collected that data for the purpose of this research because electronic search was not possible. The number of complaints based on disability increased in 2025, when 22 complaints were submitted, while the highest number of complaints based on age were recorded in 2023 and 2022, when 18 complaints were submitted.. Nevertheless, the number of formally reported cases remains relatively low compared to the survey findings, where a substantial proportion of respondents reported experiencing discrimination.[36]

The NES highlighted that, while many employment measures are targeted at specific age groups, age limits are generally waived for persons with disabilities as a form of positive discrimination aimed at improving labour market inclusion.

2.3.7. Employer engagement, reasonable accommodation and workplace adaptation

Albania

The research findings indicate that employer engagement, reasonable accommodation and workplace adaptation remain limited in Albania. From the institutional side, the Employment Agency presents employer subsidies, vocational training, job mediation and support measures as available to young persons with disabilities. However, the available response does not provide detailed evidence on whether workplace adaptations are systematically recorded, evaluated or followed up, nor whether employers retain young persons with disabilities after subsidies or support measures end.

Civil Society Organization interviews confirm that employer resistance is a central barrier. Respondents describe prejudice, low expectations, lack of information and unwillingness to train or adapt workplaces as common problems. One CSO respondent noted that employers

[36] Data provided by the Commissioner for Equality,in response to an access to public information request, 2021–2025.

may reject candidates indirectly by claiming they do not have the required skills, instead of providing training or adaptation. Other CSO responses also link employer resistance to weak enforcement of legal obligations and lack of sanctions.

Youth interview evidence supports this assessment. One interviewed young person had participated in training activities, but the programme was general and did not appear to include individualized accommodation or lead directly to employment. Another respondent had no contact with any Employment Agency, meaning there was no institutional support for obtaining workplace adjustments or negotiating reasonable accommodation.

Overall, employer engagement in Albania appears to depend too heavily on employer willingness, project-based mediation or individual initiative. Reasonable accommodation and workplace adaptation are not yet consistently embedded in employment programmes, recruitment or workplace follow-up. The evidence points to the need for stronger employer training, clearer standards for reasonable accommodation, better monitoring of workplace adaptations, incentives linked to actual retention and stronger enforcement of employer obligations.

North Macedonia

The research findings indicate that in North Macedonia, employer involvement in the employment process of persons with disabilities, as well as the implementation of reasonable accommodation and workplace adaptation, remains at a limited level. Although there is a legal framework that provides for the principles of non-discrimination and the obligation to ensure accessible and adapted working conditions, the practical implementation of these obligations remains inconsistent. Respondents point out that employers often demonstrate limited willingness to invest in workplace adaptation and to provide individualized support for persons with disabilities. In practice, reasonable accommodation is most often reduced to basic physical adjustments, while needs related to work organization, mentoring support, assistive technology, or flexible working arrangements are less frequently taken into account.

In this context, sheltered companies play an important role in providing employment opportunities for persons with disabilities. However, the research shows that there is a risk that they contribute to segregation rather than inclusion in the open labour market. Some interlocutors pointed to cases in which sheltered companies formally employ persons with disabilities but do not ensure adequate workplace adaptation or real work integration, instead primarily benefiting from the incentives and financial advantages provided for such

companies. In certain cases, persons with disabilities reportedly receive remuneration without being meaningfully integrated into the work process, raising concerns regarding the effectiveness of monitoring mechanisms and the actual purpose of the incentives granted to sheltered companies.

From a legal perspective, the employment of persons with disabilities in North Macedonia is regulated by the Law on Employment of Persons with Disabilities, adopted in 2000, which as a lex specialis in relation to the Law on Labour Relations governs the employment of persons with disabilities in the labour market, particularly within sheltered companies. Although the law has been amended several times, some interviewees believe that it has not fully achieved its objectives, particularly in terms of ensuring sustainable and inclusive employment. For this reason, a Draft Law on Employment and Professional Rehabilitation of Persons with Disabilities has been proposed, which envisages the establishment of at least four vocational rehabilitation centres across the country, in Skopje, Bitola, Tetovo and Shtip. According to the proposal, these centres would provide services such as counselling, motivation and encouragement, assessment of working capacity and professional competencies, planning and adaptation of workplaces and working environments, professional support and post-employment follow-up, strengthening of work potential, virtual workshops, architectural and technical adaptations, as well as assessment of work efficiency.

In interviews with representatives of the Public Institution Institute for Rehabilitation of Children and Youth, it was emphasized that such an individualized approach is particularly important, as without adequate assessment of working abilities, persons with disabilities are often employed in unsuitable positions, which results in early termination of employment and unsuccessful integration into the workplace. According to the interviewees, proper assessment and matching of an individual's abilities with workplace requirements are essential preconditions for sustainable employment.

The research further shows that the role of the Employment Agency of the Republic of North Macedonia in workplace assessment and adaptation is limited. Under the current system, the Agency is not mandated to conduct compulsory on-site assessments of the extent to which a specific workplace is adapted to the needs of a person with a disability; instead, assessments are mostly based on submitted documentation. Although the Agency plays a role in approving funds for workplace adaptation and vocational training, the legal framework does not provide a detailed and systematic methodology for mandatory field inspections and monitoring of the actual implementation of adaptations.

Interviews with young persons with disabilities and CSOs indicate that employer attitudes continue to play a significant role in shaping employment opportunities. While some employers demonstrate openness and willingness to provide support, others remain reluctant to employ persons with disabilities due to concerns regarding productivity, absenteeism, adaptation costs or a lack of understanding of disability-related needs. Several interviewees noted that employment is sometimes maintained only for as long as financial incentives are available, raising concerns about the long-term sustainability of employment relationships after support measures expire.

Serbia

The Ombudsman's response provides an important example related to reasonable accommodation in the workplace. In a case concerning a person with a disability, the Ombudsman found that the Labour Inspectorate failed to adequately consider the fact that the complainant was a person with a disability and did not properly address the employer's obligation to adapt communication so that the employee could fully understand their rights and obligations arising from the employment relationship. This example shows that reasonable accommodation should not be understood only as physical adaptation of the workplace, but also as accessible communication, adapted procedures and meaningful support within the employment relationship. It also highlights the need to strengthen the capacities of inspection bodies and employers to recognise and implement reasonable accommodation in practice.

Employer engagement is also presented as an important condition for improving the employability of young persons with disabilities. The Ministry of Tourism and Youth stresses the need to support employers through education and incentives aimed at creating accessible workplaces and promoting the inclusion of young persons with disabilities in employment. The response also highlights the importance of removing workplace-related barriers and adapting training and professional practice programmes to different needs and types of disability. This indicates that reasonable accommodation should be understood not only as physical accessibility, but also as adapted training, supportive working environments and employer readiness to provide inclusive conditions.

The Ministry of Labour, Employment, Veteran and Social Affairs addresses employer engagement mainly through the connection between employment measures, labour market demand and skills development. The Ministry notes that some measures have been modified to improve their effectiveness and that new forms of support have been introduced, including

individualised support, mentor training and external mentoring for users of self-employment subsidies. It also stresses that education and training programmes should be aligned with current and projected needs of the economy. While the response does not provide detailed information on reasonable accommodation in workplaces, it indicates that employer needs, mentoring and labour-market-relevant training are important elements for improving the employment prospects of young persons with disabilities.

2.3.8. Data, monitoring and institutional learning

Albania

The findings of the research indicate that institutions in Albania collect some employment-related data on persons with disabilities and young jobseekers, but important gaps remain in disaggregation, monitoring and practical use for policy evaluation. However, the available data do not make young persons with disabilities sufficiently visible as a distinct group. As a result, young persons with disabilities remain formally present in administrative systems, but weakly visible in published monitoring and policy evaluation.

The Employment Agency's response also suggests that monitoring remains more focused on formal participation than on longer-term employment impact. While the Agency refers to existing measures such as vocational training, job mediation and employer subsidies, the available response does not show whether employment outcomes are systematically monitored six or twelve months after programme completion, whether employment continues after subsidies expire, or whether workplace adaptations are assessed for effectiveness over time. Similarly, publicly available information does not consistently show employer quota compliance, levy collection into the Social Employment Fund, fund expenditure by beneficiary characteristics or job retention after support ends.

The interviews with young persons with disabilities and CSOs point to a gap between administrative records and lived experience. One interviewed young person accessed training through an organisation rather than directly through the Employment Agency, while another had no contact with the Employment Agency at all. These cases show that some young persons with disabilities may remain outside formal employment-service monitoring. CSOs also emphasised the lack of accurate data combining youth and disability, and argued that existing information does not sufficiently capture barriers such as accessibility,

employer attitudes, rights awareness, reasonable accommodation and follow-up after programme participation.

Institutional coordination also appears limited. Employment policy, youth policy, disability inclusion, social protection and education are managed through separate institutional channels. No dedicated monitoring structure for young persons with disabilities was identified, and there is no clear evidence of an integrated system linking employment data with education, social protection or disability assessment databases. This limits the possibility of tracking the transition from education to employment and of evaluating whether support measures lead to sustained labour market inclusion.

Strengthening institutional learning would therefore require regular publication of cross-disaggregated data, stronger outcome indicators, better coordination between databases and greater use of youth, CSO and employer feedback in evaluating employment measures.

North Macedonia

The findings of the research indicate that institutions in North Macedonia collect a certain amount of data related to persons with disabilities and employment; however, important gaps remain in the availability, disaggregation and practical use of these data for policy development and evaluation.

According to information provided by the Employment Agency, the institution maintains records that combine disability status and age. The available database enables the generation of age-disaggregated statistics for registered unemployed persons with disabilities, including categories such as 15–19, 20–24, 25–29, 30–34 years of age and older groups. As of 31 December 2025, the Employment Agency recorded 98 unemployed persons with disabilities aged 20–24 and 115 persons with disabilities aged 25–29. These data demonstrate that age and disability can be cross-tabulated within the existing information system and that the technical capacity for producing such statistics exists.

Despite this technical possibility, the research identified important limitations in the use of data for monitoring the labour market inclusion of young persons with disabilities. While institutions are able to provide information on the number of unemployed persons with disabilities by age category, they were not able to provide detailed data on the participation of young persons with disabilities in specific Active Labour Market Measures, nor on employment outcomes achieved by this particular group. Most of the available statistics are

collected and reported for persons with disabilities as a whole, without systematic analysis of the specific experiences and outcomes of young persons with disabilities.

Information provided by the Employment Agency shows that some follow-up data are collected after programme completion, including information on employment status six and twelve months after participation in selected measures. The Agency also monitors indicators such as employment retention and, in some cases, contract continuation following subsidized employment measures. However, the available monitoring system does not provide a comprehensive picture of job quality, wage levels, career progression, workplace inclusion or long-term employment stability. Similarly, available records concerning workplace adaptation primarily focus on approved financial support for workplace adaptation and training measures. The current system does not include a comprehensive methodology for assessing the effectiveness of workplace adaptations, nor does it systematically monitor whether accommodations continue to meet the needs of employees over time.

Interviews with CSOs and young persons with disabilities indicate a significant gap between administrative monitoring and the actual experiences of programme participants. Many respondents reported that they received little or no follow-up support after programme completion or employment placement. According to several interviewees, institutions rarely assess whether employment remains sustainable after the initial support period, whether accommodations continue to be provided, or whether the employee has successfully integrated into the workplace. CSOs further emphasized that official statistics do not always capture the full range of barriers faced by young persons with disabilities. In their view, available data provide information about participation rates and programme implementation but offer limited insight into accessibility barriers, discrimination, workplace adaptation, quality of employment, or the reasons why some participants fail to secure or maintain employment.

The research also identified limitations regarding data integration across institutions. Although certain information is available within the Employment Agency's databases, there is no fully integrated system that systematically connects employment data with education, social protection, disability assessment and other relevant databases. This makes it difficult to monitor the transition from education to employment, track long-term employment trajectories and evaluate the broader impact of employment policies on young persons with disabilities.

Representatives of institutions acknowledged that additional data would be useful for evaluating the real impact of employment measures. Among the areas identified as requiring stronger monitoring are long-term employment retention, quality of employment, workplace accommodation, career progression, transitions from education to employment and the specific outcomes achieved by different categories of persons with disabilities.

Serbia

The Ombudsman stated that it does not keep data on complainants or persons whose rights were violated according to the specific age category of "young people", but does keep data related to persons with disabilities. This points to an important data gap: even where disability-related information exists, it is not necessarily combined with age in a way that would make young persons with disabilities visible as a specific group. The lack of age-disaggregated disability data can limit the ability of institutions to identify specific needs, monitor access to services, assess the effectiveness of measures and design targeted employment policies for young persons with disabilities.

Regarding data and monitoring, the Ministry of Tourism and Youth refers to annual reports on the implementation of the Youth Strategy, annual research on the position and needs of young people, and the Youth Wellbeing Index. These instruments provide a basis for monitoring youth policy more broadly. However, the response does not clearly indicate whether data are systematically disaggregated by both age and disability in a way that would allow specific monitoring of young persons with disabilities as a distinct group. Therefore, while monitoring mechanisms exist, further development of age-and-disability disaggregated data would be important for assessing the reach and effectiveness of employment-related measures for this group.

The Ministry of Labour, Employment, Veteran and Social Affairs 's response provides substantial information on data and monitoring. It states that the NES keeps records on unemployed persons in accordance with relevant regulations, including data that can combine age and disability. The Ministry also explains that coverage of young persons with disabilities in active labour market measures is monitored through the Performance Agreement of the NES, while more detailed disaggregated data can be obtained through specific requests. In terms of institutional learning, the Ministry highlights the use of action plan reports, indicator passports, independent evaluations and future ex-post and ex-ante analyses for the preparation of the next employment strategy cycle for 2027–2032. However,

the systematic public publication of cross-disaggregated data is not fully addressed, as the Ministry notes that it is not the producer of official statistics.

The National Employment Agency monitors and evaluates the impact of the measure on the 180th days after completion of the programme, irrespective of how long the measure lasted.The NES highlighted that greater integration of institutional systems would facilitate administrative procedures, as well as the registration and monitoring of beneficiaries. Improved data sharing would enable more comprehensive support for service users. According to the NES, the lack of interconnected systems and integrated services remains one of the main institutional barriers to effective monitoring and service provision. Attempts have been made to establish integrated services between the NES and social welfare centres; however, implementation has not been successful in all locations. Where such cooperation has been achieved, positive outcomes and improved service delivery have been observed. These arrangements have generally been easier to establish in smaller communities, particularly where the institutions are located in close proximity, such as in the same building or nearby facilities.

2.3.9. Institutional coordination and role of CSOs

Albania

The research suggests that institutional responsibilities in Albania are formally divided between employment services, social protection structures, disability-related bodies and youth institutions. However, the primary research provides limited evidence that these actors cooperate through structured mechanisms specifically for young persons with disabilities. The Employment Agency presents itself as the main operational actor for access to employment promotion measures, vocational training, job mediation and employer subsidies. However, its response does not directly explain whether there are database links with education, social protection or disability assessment systems, or whether integrated tracking exists across institutions.

The primary interviews therefore suggest that coordination remains weakly documented and likely fragmented. There were no direct responses from the Ministry responsible for Youth, Ombudsman institutions or equality bodies, so their role in cooperation, referrals or policy coordination cannot be assessed from the primary data. The Member of Parliament interview also indicates limited political responsiveness, with feedback coming mainly from broader

disability-related associations rather than directly from young persons with disabilities or their specific representative structures.

Civil Society Organization responses show that CSOs play an important gap-filling role. One respondent argues that CSOs should strengthen advocacy and monitoring, provide supported employment and job coaching and build concrete links with the private sector. Another respondent stresses that CSOs themselves need better coordination, because overlapping projects can create confusion and weaken long-term support. These responses suggest that CSOs are not only consulted as advocacy actors, but also compensate for gaps in outreach, guidance, employer mediation and practical support.

Overall, while secondary research points to formally distributed institutional responsibilities, the primary findings suggest that cooperation is not clearly formalized around young persons with disabilities. CSOs appear to function more as informal or project-based gap-fillers than as systematically integrated partners in service delivery or transition-to-work pathways. This points to the need for structured referral mechanisms between employment services, education institutions, social protection systems, disability-related bodies and CSOs.

North Macedonia

The findings of the research indicate that support for young persons with disabilities in the employment process involves a range of institutions and stakeholders, including the Employment Agency, the Ministry of Social Policy, Demography and Youth, educational institutions, the Ombudsman, the Commission for Prevention and Protection against Discrimination, social work centres, and CSOs. However, despite the involvement of multiple actors in this field, the research suggests that coordination between them is most often carried out through individual initiatives, projects and ad hoc activities, rather than through systematic and formalized cooperation mechanisms.

Representatives of institutions noted that a certain level of communication and cooperation exists among different actors, particularly within specific projects, programmes and working groups. Nevertheless, there is no comprehensive and integrated system that continuously links institutions responsible for employment, education, social protection and disability assessment. This finding is consistent with the results presented in the section on data and monitoring, where it was identified that databases are not fully interconnected, making it more difficult to coordinate services and track the transition of young persons with disabilities from education to employment.

CSOs play a particularly important role in providing support. According to the responses received, CSOs frequently offer services and assistance that are either unavailable or insufficiently developed within the institutional system. Their activities include providing information on employment opportunities, career guidance, assistance with applications for employment measures and programmes, awareness-raising on disability rights, mediation with employers, psychosocial support, and referrals to relevant institutions. As a result, CSOs often act as intermediaries between young persons with disabilities and public institutions, filling important gaps within the support system.

Interviews with young persons with disabilities indicate that they most commonly receive information about employment opportunities through CSOs, educational institutions, family members and friends, while institutional career guidance mechanisms are used less frequently. These findings suggest that career guidance is still not a systematically developed service available to all young persons with disabilities. The lack of structured support during the career planning process further complicates the transition from education to employment and limits opportunities for young persons with disabilities to obtain timely information about occupations that match their abilities, interests and needs.

During the research process, several institutions and CSOs emphasized the need for more systematic support and referral mechanisms. In this regard, the proposed Law on Employment and Professional Rehabilitation of Persons with Disabilities represents an important development. The proposed legislation envisages the establishment of professional rehabilitation centres in several regions of the country. According to the proposed provisions, these centres would provide counselling, motivation and encouragement, assessment of work abilities and professional competencies, career guidance, support in career choice, preparation for employment, workplace adaptation, professional support after employment, and monitoring of labour market integration. Existing institutions working with persons with disabilities would also play an important role in the implementation of these activities.

The research findings indicate that CSOs are currently involved not only in advocacy and policy consultation processes, but also in the direct provision of support to young persons with disabilities. However, their activities largely depend on project-based funding and available resources, which affects the continuity and accessibility of services. Consequently, several interviewees highlighted the need for formalized cooperation mechanisms between public institutions and CSOs, as well as clear referral systems, coordination procedures and

information-sharing practices, in order to ensure that young persons with disabilities receive timely, continuous and comprehensive support throughout their employment pathways.

Serbia

The responses from the relevant institutions point to the importance of institutional coordination and cooperation with CSOs in improving the position of young persons with disabilities in the labour market. The Ombudsman emphasized its broader role in monitoring the work of public authorities, issuing recommendations and initiatives, and contributing to the protection and promotion of the rights of persons with disabilities. It also established a Council for the Rights of Persons with Disabilities, composed of persons with disabilities, representatives of organisations working on disability rights, accessibility experts and representatives of the academic community. This mechanism is important because it reflects the principle "Nothing about us without us" and creates space for expert and advisory input from persons with disabilities and their organisations. For employment policy, such cooperation is relevant in identifying barriers, improving institutional practice and ensuring that policy measures reflect the lived experiences of persons with disabilities.

The Ministry of Tourism and Youth also emphasizes cooperation between institutions as an important element of youth policy implementation. Employment-related institutions participate in regular reporting and in the working group responsible for monitoring the Youth Strategy. The Ministry further recognises the importance of cooperation between education institutions, employment services and civil society in supporting the transition from education to the labour market. It also states that young people from vulnerable groups should be continuously included in the development of national and local strategic documents and in activities implemented by associations, youth offices and other actors. This points to a policy intention to strengthen inclusive participation, although the Ministry also acknowledges that participation is still not systematically ensured in all phases of policymaking.

The Ministry of Labour, Employment, Veteran and Social Affairs similarly recognises the importance of cooperation with relevant stakeholders for improving employability and employment outcomes for persons with disabilities, including young persons with disabilities. It specifically notes the need for CSOs to intensify outreach and activation activities targeting young persons with disabilities in the labour market. The Ministry also states that it will continue consultative processes with relevant actors at national and local

level, including social partners and the donor community, in order to identify additional forms of support and cooperation.

The National Employment Agency emphasizes the need of cooperation with the business sector and educational institutions in order to encourage a greater number of individuals to register with employment services and access available support measures. It notes cooperation with Tax administration and social welfare centres.

Overall, the institutional responses show that cooperation between public institutions, CSOs, education institutions, employment services, employers and other stakeholders is considered important, but still requires stronger systematisation. A more structured multi-stakeholder approach is particularly relevant for reaching young persons with disabilities who are not sufficiently connected to formal employment services, improving outreach and information-sharing, and ensuring that employment measures are better adapted to their actual needs.

2.3.10. Reform priorities and recommendations from the interviewed institutions, CSOs and young people with disabilities

Albania

- Young persons with disabilities should be recognised as a distinct employment-policy target group, rather than being addressed only under broader categories such as youth, persons with disabilities or vulnerable groups.
- Outreach and accessible information on employment measures, rights and services should be improved, especially for young persons who are not registered with the Employment Agency.
- Active Labour Market Measures should be adapted to age- and disability-specific needs, including individualised support, reasonable accommodation and post-programme follow-up.
- Transition-to-work support should be strengthened through career counselling, internships, practical training, job coaching and stronger links between schools, vocational training centres and employment services.
- Employer engagement should be improved through awareness-raising, incentives linked to retention, support for workplace adaptation and stronger monitoring of employer obligations.
- Enforcement of existing legislation should be strengthened, including quotas, sanctions and anti-discrimination mechanisms.

- The Social Employment Fund should be made functional and visible for workplace adaptation, employer incentives and employment-related support.
- Data and monitoring should be improved, especially disaggregated data combining age and disability data, programme outcomes, job retention and follow-up after subsidies or training.
- Coordination between employment services, education institutions, social protection, disability bodies, local government and CSOs should be strengthened.
- The gap in institutional recommendations should be addressed. No direct responses were available from the Ministry of Labour, the Ministry responsible for Youth or the Ombudsman. The anti-discrimination/equality body mainly referred to existing documents, while the Employment Agency mostly referred to current measures rather than proposing detailed reforms.

North Macedonia

- Young persons with disabilities should be explicitly recognised as a distinct target group within employment strategies, youth policies and Active Labour Market Measures, with targeted programmes that address their specific needs during the transition from education to employment.
- A system of continuous career guidance and vocational orientation should be established for young persons with disabilities, beginning in secondary education and continuing throughout higher education and the employment process.
- Opportunities for internships, work placements, supported employment and first work experience should be expanded in order to facilitate the integration of young persons with disabilities into the labour market.
- The physical, communication and digital accessibility of workplaces and employment services should be improved, while a more effective system of reasonable accommodation based on individual needs assessments should be established.
- The professional rehabilitation centres envisaged under the proposed Law on Employment and Professional Rehabilitation of Persons with Disabilities should be established and supported, ensuring individualised assistance both before and after employment.

- Efforts to raise awareness among employers about the capacities and potential of persons with disabilities should be strengthened, together with measures promoting reasonable accommodation and inclusive working environments.
- A more comprehensive system for collecting, linking and publishing data disaggregated by age, type of disability and employment status should be established, alongside stronger monitoring of the long-term outcomes of employment measures.
- Awareness among young persons with disabilities regarding their employment rights, available anti-discrimination protection mechanisms and employment support opportunities should be strengthened.
- Formalised mechanisms for coordination and cooperation should be established among public institutions, educational institutions, employers and CSOs, including clear referral pathways and support systems for young persons with disabilities throughout the employment process.
- Active Labour Market Measures should be regularly evaluated not only on the basis of the number of beneficiaries, but also according to their actual impact on sustainable employment, job quality and the social inclusion of young persons with disabilities.

Serbia

- A stronger statistical database on persons with disabilities should be developed. Since the NES and the Republic Pension and Disability Insurance Fund hold relevant data, and since persons have the right not to disclose their disability status, data from these institutions should be combined to provide a clearer picture of the number and position of persons with disabilities.
- Implementation of the law should be monitored more closely, as the main problem lies in implementation in practice. Stronger monitoring should help identify where implementation gaps occur.
- The law should be implemented consistently and precisely. Although the legal framework is clear, poor implementation can lead to discrimination or discriminatory effects.
- Programmes should be developed through cooperation among several institutions, rather than by one institution alone. Coordination and collaborative programme creation should contribute to more sustainable Active Labour Market Measures.

- Cooperation between institutions should be improved. For example, cooperation between the NES and Centres for Social Work may function better in smaller places, where institutions are physically closer or located in the same building, while in larger places this cooperation is often weaker or absent.
- Establish and strengthen stronger connections between education and the labour market to ensure a smoother transition from education to the labour market.
- Stronger monitoring and enforcement by the Tax Administration would help ensure compliance with employment-related obligations.
- Awareness about who is considered a young person should be increased. Survey responses included a number of persons aged 32, who do not belong to the youth category, which indicates misinformation about the definition of young people.
- Wider research should be conducted in order to create special programmes for young persons with disabilities.
- Training for employers and HR staff should be provided in order to raise awareness that hiring young persons with disabilities is not complicated and to increase sensitivity.
- Provide targeted training and workshops for employers to improve understanding of disability inclusion and reasonable accommodation in the workplace.
- Better career guidance should be developed within the NES, so that the quality of support does not depend on the individual career adviser assigned to the young person.
- A larger budget should be allocated to the NES in order to increase the number of Active Labour Market Measures and ensure that existing measures last longer and can be more effective.
- The procedure for assessing work capacity should be reformed to include a more psychosomatic evaluation of the person.
- More work centres should be developed as one of the options through which persons with total disability can obtain some form of employment and, as a result, income.
- Active employment measures should be adapted to labour market needs by changing existing programmes so that people can acquire skills applicable to available jobs.
- Existing rights should be implemented consistently in practice, so that inclusion of persons with disabilities does not remain only declarative, but is translated into accessible employment support, adapted working conditions and effective protection of labour rights.

- Awareness of rights and available protection mechanisms should be strengthened, both among persons with disabilities and among public authorities, including information on how to use complaint mechanisms when rights are violated.
- Regulatory and systemic gaps should be addressed, including the adoption of missing bylaws related to work centres and, where needed, amendments to existing regulations affecting the employment and work engagement of persons with disabilities.
- Tailored transition-to-work support should be strengthened by expanding individual career guidance, adapted training, professional practice and cooperation between schools, employment services and employers.
- Introduce a systematic approach from the early stages of education to better prepare young persons with disabilities for the labour market and facilitate their transition to employment.
- Outreach and accessibility of employment measures should be improved so that young persons with disabilities and their families are better informed about available programmes, support services and employment opportunities.
- Employer engagement and workplace accessibility should be increased through awareness-raising, incentives, support for accessible workplaces and measures that address prejudice and assumptions about the abilities of young persons with disabilities.
- Alignment between education and labour market needs should be improved by introducing new qualifications and vocational profiles for persons with disabilities, especially in secondary vocational education.
- Adapted non-formal training opportunities should be expanded by increasing the number and type of accredited adult education providers offering programmes accessible to persons with disabilities.
- Outreach and activation of young persons with disabilities should be strengthened, particularly through cooperation with CSOs, employment services, social partners and local-level actors.
- NES should write and publish some informative brochure for YPWD about the registration process, possibilities for cooperation with NES and active labour measures and services.
- Activities for raising awareness YPWD of their rights in employment.

CONCLUSION

The comparative findings show that Albania, North Macedonia and Serbia have all established legal, strategic and institutional frameworks that formally include young people and persons with disabilities in employment-related policies. However, across the three

countries, young persons with disabilities remain insufficiently recognised as a distinct intersectional group. They are most often addressed either as part of the broader youth population or as part of the wider group of persons with disabilities, which limits the development of targeted measures, specific indicators and tailored support mechanisms.

The research shows a common gap between formal inclusion and practical access. Employment services, Active Labour Market Measures, training programmes and employer incentives exist in all three countries, but their accessibility, adaptation and effectiveness vary. Across the region, the transition from education to employment remains one of the weakest parts of the system. Young persons with disabilities often lack career counselling, practical work experience, accessible training, mentoring and structured guidance on how to move from school or university into the labour market. Employer attitudes, lack of reasonable accommodation, limited accessibility, insufficient information and weak coordination between institutions further restrict their employment opportunities.

The findings also indicate that participation in employment programmes does not automatically lead to sustainable employment. Monitoring systems still focus largely on participation and outputs, while less attention is given to job retention, job quality, long-term outcomes and workplace inclusion. CSOs play an important role in filling these gaps, but their support is often project-based rather than formally integrated into employment systems.

Overall, the research points to the need to move from formal recognition toward practical, targeted and monitored support. Improving the employability of young persons with disabilities requires stronger institutional coordination, accessible and individualised services, better data, more effective employer engagement and employment measures that respond to both age-related and disability-related barriers.

Common recommendations for Albania, North Macedonia and Serbia

- **Recognise young persons with disabilities as a distinct target group** in employment strategies, youth policies, disability policies, Active Labour Market Measures and monitoring systems, rather than addressing them only through broader categories such as “youth”, “persons with disabilities” or “vulnerable groups”.
- **Develop targeted employment measures that respond to both age-related and disability-related needs**, including tailored support for young persons with

different types of disabilities, different education levels and different levels of labour market readiness.

- **Improve outreach and accessible information** on employment services, rights, available programmes and application procedures, especially for young persons with disabilities who are not registered with Employment Agencies or are outside formal support systems.
- **Make Employment Agencies more proactive and accessible**, including through accessible formats, simplified procedures, direct outreach, support in preparing applications, and clearer communication with young persons with disabilities and their families.
- **Strengthen transition-to-work support** by linking schools, universities, vocational training providers, Employment Agencies, employers and CSOs through structured pathways from education to employment.
- **Expand career counselling, vocational orientation, internships, practical training, supported employment and job coaching**, starting from secondary education and continuing throughout the job-search and employment process.
- **Link training and employment programmes more clearly to real job opportunities**, so that participation in programmes does not remain an isolated activity but leads to internships, work placements, temporary employment or sustainable employment.
- **Improve the quality and sustainability of employment outcomes**, by monitoring whether employment continues after training, wage subsidies or other support measures end, and by assessing job quality, retention and career progression.
- **Strengthen employer engagement** through awareness-raising, practical guidance, incentives and support for inclusive recruitment, workplace adaptation and retention of young persons with disabilities.
- **Ensure reasonable accommodation in employment programmes and workplaces**, including not only physical accessibility, but also accessible communication, assistive devices, adapted working conditions, mentoring, workplace support and individualised adjustments.
- **Strengthen anti-discrimination enforcement and rights protection**, including better recognition of intersectional discrimination based on both age and disability, accessible complaint mechanisms, and stronger institutional response to discrimination in recruitment and employment.

- **Improve data collection, linking and publication**, especially by producing and using age-and-disability disaggregated data on registration, participation in employment measures, employment outcomes, job retention and post-programme follow-up.
- **Evaluate Active Labour Market Measures based on impact, not only participation**, including whether they lead to sustainable employment, improved employability, better job matching and meaningful inclusion in the labour market.
- **Formalise cooperation between institutions and CSOs**, including referral pathways between Employment Agencies, education institutions, social protection services, disability assessment bodies, equality bodies, employers and organisations of persons with disabilities.
- **Provide sustainable support for CSOs and organisations of persons with disabilities**, recognising their role in outreach, rights navigation, application support, employer mediation, psychosocial support and informal job coaching.