



# BRIDGING THE GAP

Enforcement of the 50+1  
Law on Employment of  
Persons with Disabilities  
in Mitrovica

APRIL 2026

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ENFORCEMENT OF THE 50+1 LAW ON EMPLOYMENT OF PERSONS  
WITH DISABILITIES IN MITROVICA

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# 1. Executive Summary

This report assesses the implementation of Law No. 03/L-019, which mandates the employment of persons with disabilities 50+1. It combines administrative data, institutional input, and qualitative evidence from internship beneficiaries to examine both formal compliance and real-life outcomes.

Findings show that, despite initial steps toward inclusion, implementation remains partial, inconsistent, and largely procedural. As of 2025, only 11 persons with disabilities are employed in municipal institutions, with a significant gender imbalance (10 men and 1 woman). At the same time, just four jobseekers with disabilities are registered at the Employment Office, and only one has secured employment.

Qualitative evidence further reveals a gap between policy and practice. While internship programs are valued as entry points, their impact is limited by weak mentorship, unclear roles, accessibility barriers, and lack of employment pathways. In several cases, experiences in public institutions were described as passive and not outcome-oriented inclusion.

The analysis identifies five key systemic barriers:

- Lack of enforcement and accountability mechanisms
- Weak and fragmented data systems
- Persistent accessibility barriers
- Limited labor market activation
- Gender disparities in employment

These findings indicate that the main challenge lies not in the legal framework, but in its implementation. Current efforts rely on formal compliance without the systems needed to ensure results. To address this, the report calls for a shift toward a coordinated, system-based approach, supported by:

- Mandatory monitoring and accountability mechanisms
- Centralized, gender-disaggregated data systems
- Full accessibility of public institutions
- Stronger employment services and activation measures
- Private sector engagement through incentives
- Targeted measures for women with disabilities

Advancing inclusive employment is not only a legal requirement, but a governance and human rights obligation. Without systemic implementation, the 50+1 Law will continue to fall short of its intended impact.

## 2. Introduction & Purpose

The employment of persons with disabilities in Kosovo remains one of the clearest gaps between legal commitment and institutional practice. Despite a well-established framework, including the 50+1 Law (Law No. 03/L-019), implementation continues to fall short, particularly at the local level, where enforcement responsibility is most direct.

The Municipality of Mitrovica South reflects this broader systemic challenge. While efforts toward inclusion exist, they remain fragmented and inconsistently applied, failing to ensure compliance with legal obligations. Persistent low employment rates, weak enforcement, and structural barriers point to a core issue: not the absence of policy, but the absence of institutional accountability and operational follow-through.

This report responds to that gap. It goes beyond assessing the current state of implementation to examine why the 50+1 Law is not functioning as an effective instrument for inclusion. Importantly, the analysis combines institutional data with the lived experiences of persons with disabilities who have participated in municipal employment initiatives. These perspectives provide critical insight into how policies are implemented in practice, and where they fail.

The report aims to:

- assess compliance with the 50+1 Law at the municipal level
- identify systemic barriers to effective implementation
- highlight gaps between formal measures and actual outcomes
- provide actionable, evidence-based recommendations

This is a policy-oriented assessment designed to support accountability and inform corrective action. At its core, the report advances a clear position: legal obligation without enforcement is ineffective, and inclusion without accountability remains rhetorical. For the 50+1 Law to deliver results, institutions must move beyond declarative commitments and adopt a system-based approach grounded in:

- measurable compliance
- transparent monitoring
- accessible infrastructure
- active labor market integration

The findings are intended to inform local and central institutions, as well as development partners and civil society, with the objective of shifting from partial implementation to enforceable and sustainable inclusion.

### 3. Background & Legal Context

The employment of persons with disabilities in Kosovo is governed by a comprehensive legal and policy framework that establishes clear obligations for public and private institutions. At its core is Law No. 03/L-019 on the Training, Rehabilitation and Employment of Persons with Disabilities<sup>1</sup> (the “50+1 Law”), which requires that for every fifty (50) employees, at least one person with a disability must be employed. This provision is binding and applies across both public institutions and private sector employers.

This national obligation is reinforced by Kosovo’s commitment to international human rights standards, most notably the United Nations Convention on the Rights of Persons with Disabilities (CRPD). The CRPD establishes the right of persons with disabilities to work on an equal basis with others, including the right to gain a living through freely chosen employment in an open, inclusive, and accessible labor market. It further obliges states to prohibit discrimination, ensure reasonable accommodation, and promote active inclusion in employment.

In principle, Kosovo’s legal framework reflects these standards. It moves beyond voluntary inclusion and establishes a quota-based, enforceable model intended to guarantee minimum participation in the labor market. Municipal institutions, as both employers and implementing authorities, carry a dual responsibility:

- to comply with the quota requirement in their own workforce
- to contribute to the enforcement and normalization of inclusive employment practices

However, evidence from Mitrovica South indicates that the existence of a strong legal framework has not translated into consistent implementation.<sup>2</sup> The gap between law and practice is not due to ambiguity in legal provisions, but rather to weaknesses in enforcement architecture and institutional accountability.

Key shortcomings include:

- Absence of formal monitoring and reporting mechanisms to track compliance with the quota
- Lack of enforcement measures or sanctions for non-compliance
- Limited institutional clarity regarding roles and responsibilities for implementation
- Weak integration of disability inclusion into human resource planning and recruitment processes

As a result, the quota system functions largely as a declarative obligation rather than an operational requirement. Compliance, where it occurs, appears incidental rather than systematically enforced.

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<sup>1</sup> LAW NO. 03/L-019 on vocational ability, rehabilitation and employment of people with disabilities

<sup>2</sup> Analysis of municipal employment data and institutional responses, Mitrovica South, 2025.

Furthermore, the legal framework is not sufficiently supported by complementary policies and systems necessary for its implementation. These include:

- functional labor market activation mechanisms
- accessible public infrastructure
- targeted training and qualification pathways
- and reliable, disaggregated data systems

The situation in Mitrovica South illustrates a broader structural issue, the effectiveness of disability employment policy in Kosovo is constrained not by the absence of law, but by the absence of enforcement and system-level coordination. Bridging this gap requires repositioning the 50+1 Law from a formal requirement to a monitored, enforced, and institutionally embedded obligation, supported by clear accountability mechanisms and operational tools.

## 4. Methodology & Scope

This report is based on a mixed-methods approach combining quantitative data, institutional input, and qualitative evidence to assess the implementation of the 50+1 Law in the Municipality of Mitrovica South during 2025–2026. The methodology is designed to move beyond formal compliance analysis and capture how legal obligations are experienced and operationalized in practice.

### 4.1 Data Collection and Sources

The analysis draws on three primary sources:

- Administrative and Institutional Data
- Qualitative Evidence: Beneficiary Interviews

Quantitative data was obtained from:

- The Municipal Human Resources Unit (employment figures and institutional practices)
- The Employment Office (SIMP system data on registered jobseekers and employment outcomes)
- Structured responses from municipal authorities collected through a standardized questionnaire

These sources provide the official basis for assessing compliance with the quota system, workforce composition, and institutional measures related to inclusion.

## Qualitative Evidence: Beneficiary Interviews

A central component of this report is the integration of qualitative evidence collected through semi-structured interviews with beneficiaries of a six-month paid internship program implemented by the Municipality of Mitrovica South.

A total of six (6) beneficiaries were interviewed, with selected cases presented in this report to illustrate key patterns and systemic issues. The interviews provide direct insight into:

- the quality of workplace integration
- access to mentorship and meaningful tasks
- physical accessibility of institutions
- perceived fairness and inclusion
- and employment outcomes following program completion

Unlike administrative data, which captures outputs, these interviews reveal how inclusion measures function in practice, including gaps that are not visible in institutional reporting. These accounts are not treated as anecdotal evidence, but as analytically relevant inputs that help explain systemic patterns observed in the quantitative data.

## 4.2 Scope and Limitations

The primary focus of this report is on public sector institutions at the municipal level in Mitrovica South. While the findings provide relevant insights into broader labor market dynamics, they are not intended to represent a nationwide assessment.

The qualitative component, while limited in sample size, is used deliberately to complement and deepen the quantitative findings rather than to provide statistical generalization. Its value lies in identifying recurring patterns, institutional behaviors, and practical barriers that are not captured through formal data systems.

## 5. Key Findings

The findings indicate that the implementation of the 50+1 Law in the Municipality of Mitrovica South remains partial, inconsistent, and structurally constrained. While elements of inclusion are present, they are not embedded within a coherent enforcement or implementation system. The result is a model characterized by isolated efforts rather than institutionalized compliance.

## 5.1 Limited but Existing Employment

Municipal data indicates that 11 persons with disabilities are currently employed across public institutions, primarily within administration, education, and primary healthcare.<sup>3</sup>

### Where Do We Stand?



Figure 1 Current State of Employment Inclusion in Mitrovica South

However, this level of employment does not appear to result from systematic enforcement of the quota. Two critical imbalances highlight this:

- **Gender disparity:** 10 men and only 1 woman employed
- **Lack of proportionality:** the employment does not align with quota requirements relative to total staff

This suggests that employment occurs on an ad hoc basis, rather than through structured compliance mechanisms.

Qualitative evidence reinforces this finding. Interviewees consistently described employment opportunities as limited, unpredictable, and not transparently structured, often dependent on individual initiative or external support rather than institutional pathways.<sup>4</sup>

<sup>3</sup> Municipal employment data, Mitrovica South, 2025, provided to REC by the Human Resources Department via questionnaire, March 2026.

<sup>4</sup> Interviews with internship beneficiaries, Mitrovica South, April 2026.

## 5.2 Weak Enforcement of the 50+1 Quota

Despite the binding nature of the 50+1 Law, there is no functional system in place at the municipal level to monitor or enforce compliance.

### 50+1 Law: Commitment vs Reality

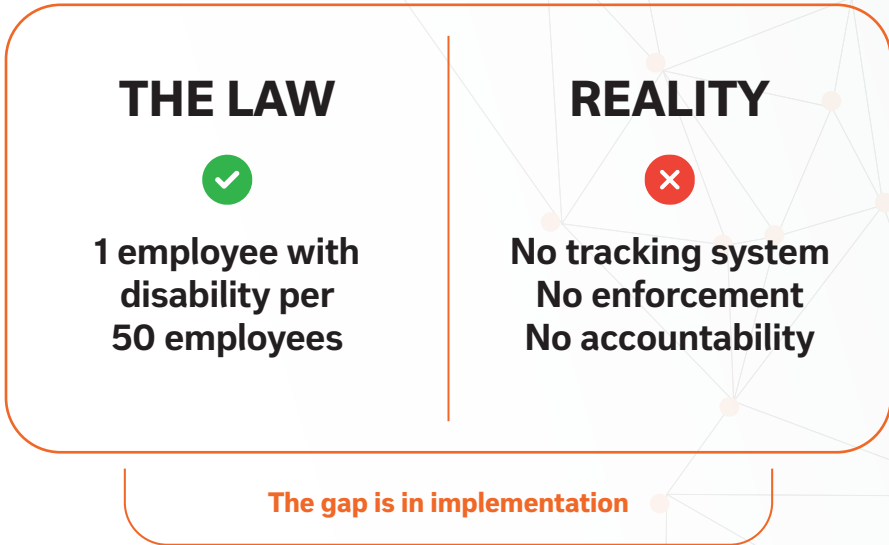


Figure 2 Commitment vs Implementation Reality

Key gaps include:

- absence of regular compliance assessments
- no public or internal reporting on quota fulfillment
- no corrective or sanctioning mechanisms for non-compliance

As a result, enforcement remains declarative rather than operational. This lack of accountability is reflected in beneficiary experiences. None of the interviewed participants reported awareness of structured institutional commitments to employing persons with disabilities beyond temporary programs such as internships.<sup>5</sup>

This indicates a disconnect between legal obligation and institutional practice, where compliance is neither tracked nor actively pursued.

<sup>5</sup> Ibid.

### 5.3 Low Labor Market Participation

Employment Office data shows a very limited number of registered jobseekers with disabilities:

- only 4 registered individuals
- only 1 person employed during 2025<sup>6</sup>

## From Jobseeker to Employment



Figure 3 Labor Market Activation Gap for Person with Disabilities

This points to a systemic issue in labor market activation, including:

- weak outreach and identification mechanisms
- barriers in accessing employment services
- limited trust or engagement with public institutions

Interview evidence provides further context. Several beneficiaries highlighted that their participation in employment-related opportunities was facilitated primarily through civil society initiatives or informal networks, rather than through Employment Office channels.<sup>7</sup>

This suggests that institutional mechanisms intended to support employment are underutilized or ineffective, limiting the pipeline of candidates required for the quota system to function.

<sup>6</sup> Employment Office (SIMP system), 2025 data. Provided to REC via questionnaire, March 2026.

<sup>7</sup> Interviews with Astrit Hasani, Eliza Delijaj, and Gazmend Hasani, April 2026.

## 5.4 Structural and Institutional Barriers

Persistent structural barriers continue to limit effective inclusion, particularly in relation to physical accessibility and workplace readiness.

### What's Holding Inclusion Back?

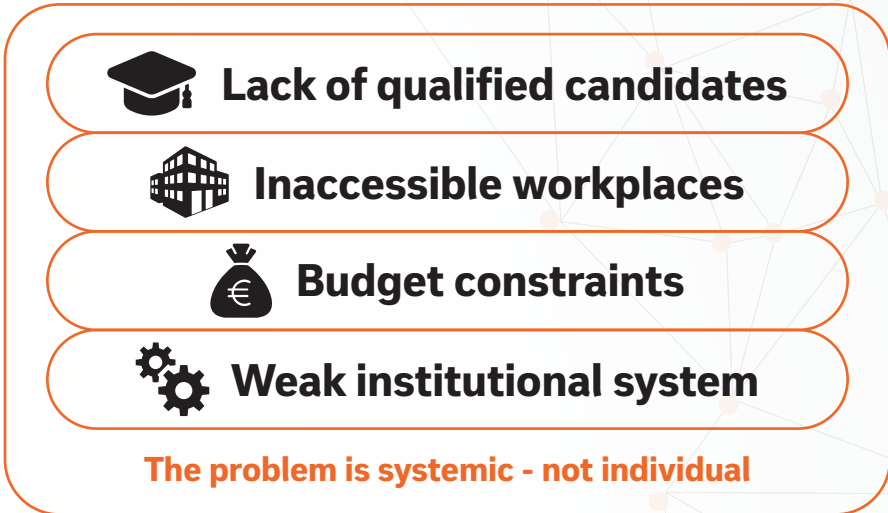


Figure 4 Structural Constraints Limiting Employment Inclusion

Municipal responses identify:

- incomplete accessibility of public buildings
- lack of adapted facilities
- budgetary constraints affecting implementation<sup>8</sup>

These barriers are directly confirmed by interviewees. For example, the absence of elevators in municipal buildings was cited as a significant obstacle to participation, restricting both access to workspaces and overall engagement in institutional life.<sup>9</sup>

In addition, the lack of accessible public infrastructure more broadly (e.g. transport, public facilities) continues to affect the ability of persons with disabilities to pursue education, training, and employment opportunities.

This demonstrates that employment inclusion is not solely a labor market issue, but a system readiness issue, where infrastructure and institutional conditions are not aligned with legal obligation.

<sup>8</sup> Municipal employment data, Mitrovica South, 2025, provided to REC by the Human Resources Department via questionnaire, March 2026.

<sup>9</sup> Interview with Eliza Delijaj, April 2026.

## 5.5 Structural and Institutional Barriers

Internship schemes represent one of the primary mechanisms through which municipal institutions engage persons with disabilities. While these initiatives are positively perceived in principle, their implementation reveals significant inconsistencies.

On the positive side, some beneficiaries reported that internships:

- provided initial exposure to institutional work environments
- contributed to personal development and confidence
- created a sense of inclusion and participation<sup>10</sup>

However, these outcomes are not consistent across cases. Recurring challenges include:

- lack of structured mentorship
- limited or unclear task allocation
- frequent changes in supervision
- absence of performance evaluation or certification

One beneficiary reported that, during the internship period, no meaningful tasks were assigned following a change in supervision, effectively reducing the experience to passive presence.<sup>11</sup>

A particularly significant finding is the contrast between public and private sector experiences. One interviewee described a transition from a municipal internship to a private sector placement, where they experienced:

- active mentorship
- equal treatment
- and ultimately, formal employment

This contrast highlights that the effectiveness of inclusion measures is highly dependent on institutional practices, rather than on the existence of programs alone.

Overall, current internship schemes risk functioning as short-term, symbolic measures unless linked to:

- structured learning objectives
- institutional accountability
- and clear employment pathways

Across all findings, a consistent pattern emerges: inclusion measures exist, but they are fragmented, uncoordinated, and not outcome-oriented. Interview evidence further reinforces this fragmentation. Beneficiaries consistently emphasized the lack of continuity, follow-up, and long-term opportunities, noting that initiatives often end without transition into employment.

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<sup>10</sup> Interview with Astrit Hasani, April 2026.

<sup>11</sup> Interview with Eliza Delijaj, April 2026.

## 6. Key Gaps & Policy Implications

The findings point to a set of systemic gaps that undermine the effective implementation of the 50+1 Law in the Municipality of Mitrovica South. These are not isolated shortcomings, but structural weaknesses that limit the law's ability to function as an enforceable instrument for inclusion.

Addressing these gaps requires moving beyond incremental improvements toward institutional and policy-level corrections.

Gap	Issue	Implication	Policy Implication (Required Actions)
<b>Gap 1: Absence of Enforcement and Accountability Mechanisms</b>	While the legal obligation is clear, there is no operational framework to ensure compliance. Monitoring, reporting, and enforcement mechanisms are not institutionalized.	Compliance becomes voluntary rather than mandatory, weakening the law's effectiveness and credibility. Institutions face no consequences for non-compliance.	<ul style="list-style-type: none"> <li>a. Mandatory institutional reporting on compliance</li> <li>b. Independent verification and oversight mechanisms</li> <li>c. Link compliance to institutional performance and accountability frameworks</li> </ul>
<b>Gap 2: Structural Barriers and Accessibility Deficits</b>	Public infrastructure remains partially inaccessible, and workplace adaptation is limited.	Employment environments remain exclusionary, reducing sustainability of inclusion and discouraging participation.	<ul style="list-style-type: none"> <li>a. Allocate dedicated budgets for accessibility</li> <li>b. Define clear institutional responsibilities and timelines</li> <li>c. Integrate accessibility standards into all planning and investments</li> </ul>
<b>Gap 3: Limited Labor Market Activation</b>	Very low number of registered jobseekers reflects weak outreach and limited activation measures.	The quota system lacks a functional pipeline of candidates, while reliance on NGOs indicates institutional underperformance.	<ul style="list-style-type: none"> <li>a. Conduct proactive outreach and registration</li> <li>b. Expand vocational training and upskilling</li> <li>c. Strengthen cooperation with CSOs and DPOs</li> </ul>
<b>Gap 4: Gender Inequality in Employment Outcomes</b>	Women with disabilities are significantly underrepresented in employment.	Intersectional discrimination limits equitable access and undermines inclusion policies.	<ul style="list-style-type: none"> <li>a. Develop targeted measures for women with disabilities</li> <li>b. Apply gender-sensitive program design and outreach</li> <li>c. Ensure gender disaggregated monitoring and reporting</li> </ul>

## 7. Strategic Recommendations

To move from partial and procedural implementation toward effective enforcement of the 50+1 Law, a focused set of priority actions is required. These recommendations are designed to be strategic, actionable, and institutionally relevant, addressing the core system gaps identified in this report.

### What Needs to Change?



Figure 5 From Commitment to Enforcement

#### 1. Establish a mandatory compliance framework for all public institutions, requiring:

- annual reporting on quota fulfillment
- standardized indicators and verification procedures
- oversight by a designated central authority

Compliance should be formally linked to institutional performance evaluation and managerial accountability. Without enforceable accountability mechanisms, legal obligations remain declarative and inconsistently applied.

#### 2. Create an interoperable, centralized database to track employment of persons with disabilities across institutions, ensuring:

- real-time data collection and updating
- disaggregation by gender, sector, and institution
- accessibility for monitoring and policy analysis

Reliable data is essential for enforcement, planning, and transparency. Current fragmentation limits evidence-based decision-making.

**3. Adopt a time-bound, fully funded plan to achieve accessibility across all public institutions, including:**

- physical infrastructure (elevators, entrances, sanitation facilities)
- workplace adaptation measures
- compliance with accessibility standards in all new investments

Accessibility is a precondition for inclusion, not a complementary measure. Without it, employment obligations cannot be fulfilled.

**4. Reposition Employment Offices as proactive actors in disability inclusion by:**

- conducting targeted outreach and registration campaigns
- providing tailored employment counseling and job-matching services
- expanding vocational training and upskilling programs
- Formalize cooperation with civil society and Disabled Persons' Organizations (DPOs) to improve outreach and trust.

The quota system depends on a functional pipeline of jobseekers, which is currently underdeveloped.

**5. Redesign internship programs as structured, outcome-oriented mechanisms by ensuring:**

- clear learning objectives and defined roles
- assigned mentorship and supervision
- performance evaluation and certification
- linkage to employment opportunities where possible

Internships should function as entry points into the labor market, not short-term or symbolic measures.

**6. Complement legal obligations with targeted measures to engage employers, including:**

- financial incentives or subsidies for inclusive hiring
- recognition schemes for compliant institutions and companies
- awareness campaigns promoting the value of inclusive workplaces

Enforcement should be paired with incentives and engagement, particularly to expand opportunities beyond the public sector.

## 7. Integrate gender-responsive approaches across all employment policies by:

- developing targeted programs for women with disabilities
- ensuring equal access to training and employment opportunities
- systematically monitoring gender-disaggregated outcomes

Addressing intersectional inequality is essential for achieving equitable and inclusive labor market participation.

### Implementation Priority

These recommendations should not be approached as isolated actions. Their effectiveness depends on coordinated implementation, where:

- enforcement mechanisms are supported by data systems
- accessibility enables participation
- activation measures generate employment pathways

The priority for decision-makers is clear:

**Shift from fragmented initiatives to a system-based approach where compliance is enforced, inclusion is measurable, and outcomes are sustainable.**



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