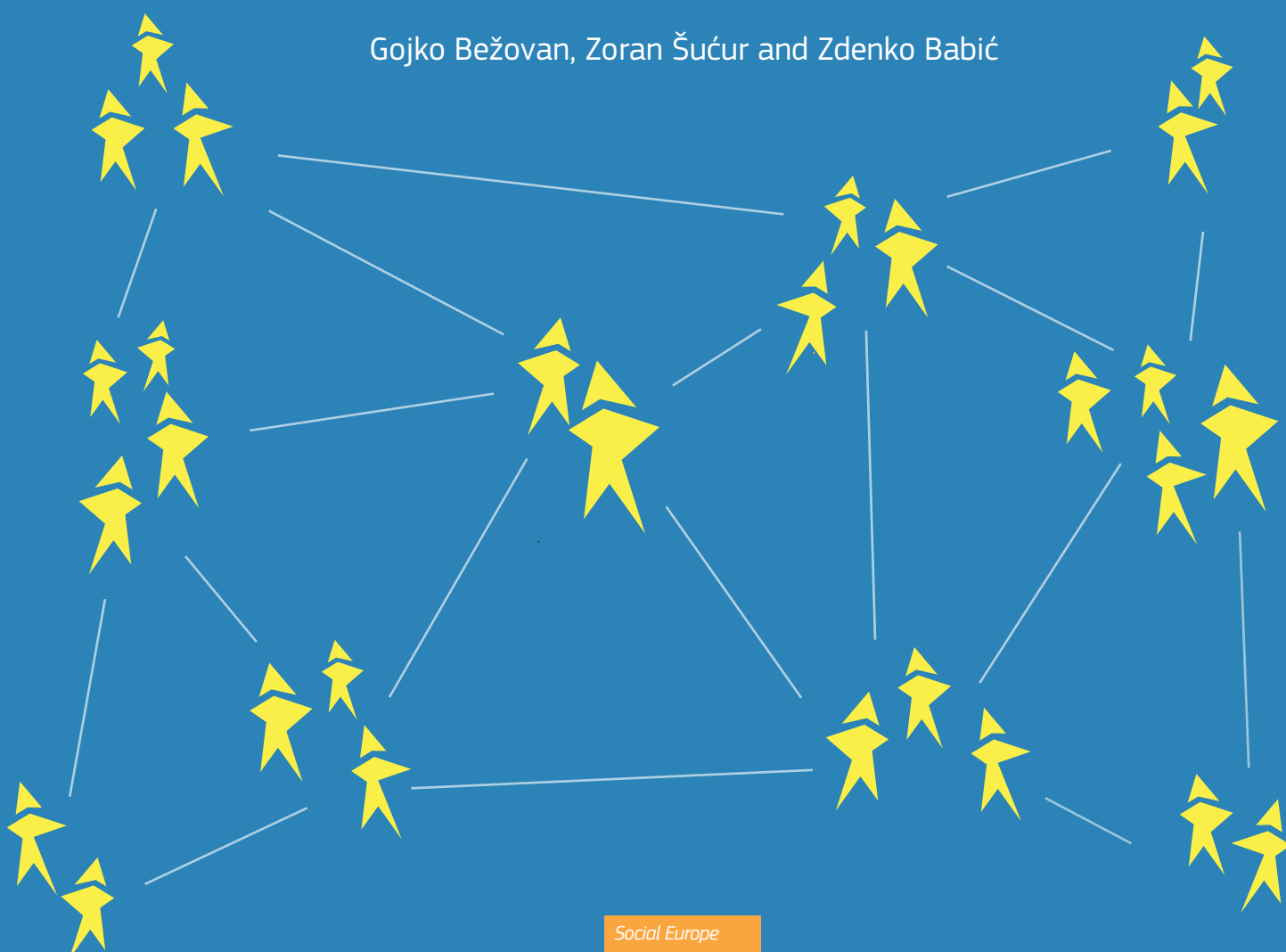


EUROPEAN SOCIAL POLICY NETWORK (ESPN)

Making access to social protection for workers and the self-employed more transparent through information and simplification

Croatia

Gojko Bežovan, Zoran Šućur and Zdenko Babić



EUROPEAN COMMISSION

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European Social Policy Network (ESPN)

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self-employed more
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information and simplification**

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2022

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CONTENTS

SUMMARY.....	4
1 CURRENT POLICIES AND PRACTICES TO ENSURE INFORMATION ON, AND TO SIMPLIFY ACCESS TO, SOCIAL PROTECTION FOR WORKERS AND THE SELF-EMPLOYED	5
1.1 Policies and practices to ensure access to information on social protection rights, entitlements and obligations	5
1.1.1 Policies and practices to ensure access to general and personalised information	5
1.1.2 General awareness-raising campaigns	9
1.2 Policies and practices to simplify access to social protection	10
1.2.1 Simplification objective embedded in reforms of social protection schemes	10
1.2.2 Simplification of the application process for accessing benefits	11
1.2.3 Simplification of the structures within the social protection administration	12
2 ISSUES, DEBATES AND ONGOING OR PLANNED REFORMS TO ENSURE INFORMATION ON, AND TO SIMPLIFY ACCESS TO, SOCIAL PROTECTION FOR WORKERS AND THE SELF- EMPLOYED	13
2.1 Issues, debates and reforms related to information	13
2.1.1 Issues	13
2.1.2 Debates.....	14
2.1.3 Ongoing or planned reforms.....	14
2.2 Issues, debates and reforms related to simplification	14
2.2.1 Issues	14
2.2.2 Debates.....	14
2.2.3 Ongoing or planned reforms.....	14
2.3 Suggestions for improvements	15
REFERENCES	16

Summary

The purpose of this report is to identify and analyse policies put in place by the country to improve transparency in access to social protection, considering both access to information and simplification of access. The report focuses on the six social protection branches covered in the 2019 Council Recommendation on Access to social protection for workers and the self-employed (hereafter "2019 Council Recommendation") and covers policies and measures implemented between January 2017 and May 2022.

General and personalised information on access to various social protection benefits is available on the websites of the Ministry of Labour, Pension System, Family and Social Policy (MLPSFSP), the Croatian Pension Insurance Institute (CPPI), the Croatian Health Insurance Institute (CHII), the Croatian Employment Service (CES), the Ministry of Health (MH) and other institutions. In addition to digital access, people can be informed about their rights via the phone or by physically coming to social welfare centres and CPPI, CHII or CES offices.

The CES provides information regarding unemployment benefits in a transparent manner through its website. The CES web portal is multifunctional and offers the facility to use an e-citizens web platform and to apply online or by e-mail for unemployment benefits.

Regarding benefits related to accidents at work or occupational diseases, information about the application procedure and the documents needed is available at the CHII webpage. Since 2017 it has been possible to apply for benefits online by filling in a predefined form from the CHII webpage.

On the CHII website, citizens, employees and the self-employed are informed about the rights they have under the compulsory health insurance system and any supplementary health insurance that they contract for themselves. In addition to this, the activities of the Croatian Association for the Promotion of Patients' Rights (CAPPR) promote patients' rights and provide information and advice on them.

Employees and the self-employed can be informed about the rights to maternity and paternity benefits via the websites of several institutions (such as the CHII and CPPI) or the "e-citizens" online portal. All portals explain separately the access to contributory and non-contributory maternity/paternity benefits.

General and personalised information on access to invalidity benefits is available on the MLPSFSP and CPPI websites, on e-citizens, or on the websites of social welfare centres and various associations of people with disabilities.

The CPPI website contains information on old-age benefits and on the length of service and age required to access them, as well as the conditions for exercising the right to survivors' benefits and who is entitled to them. Additional information can be obtained by telephone and e-mail.

There are very few examples of awareness-raising campaigns in Croatia related to social protection. This topic is poorly addressed in the media and in academic papers.

There is also very little information on measures and policies to simplify access to benefits. However, changes under the Employment Mediation and Unemployment Rights Act of 2017 were aimed at simplifying procedures and easing access to unemployment benefits for craftspeople and the self-employed.

Given that employees, the self-employed and citizens generally are not well enough informed about their social rights, campaigns to raise awareness of rights in various areas and branches of social protection are needed in the future. In addition, media campaigns would be mandatory when the existing legal regulations change significantly, and especially when new laws are passed.

In order to improve access to social protection rights, a system should be set up to ensure automatic access to rights across different sub-systems by sharing the necessary information between them, so avoiding the need to apply to each one separately.

1 Current policies and practices to ensure information on, and to simplify access to, social protection for workers and the self-employed

1.1 Policies and practices to ensure access to information on social protection rights, entitlements and obligations

1.1.1 Policies and practices to ensure access to general and personalised information

There are several key institutions and stakeholders that provide general and personalised information on access to various rights in the field of social protection. The most important among them are the Ministry of Labour, Pension System, Family and Social Policy (MLPSFSP), the Croatian Pension Insurance Institute (CPII), the Croatian Health Insurance Institute (CHII), the Croatian Employment Service (CES) and the Ministry of Health (MH). Information on access to many social protection rights is also available through the government's "e-citizens" portal. In addition to digital access, people can be informed about their rights via the phone or by physically coming to social welfare centres and CPII, CHII or CES offices. At the sub-national level, the role of social welfare centres and regional/local authorities (counties, cities and municipalities) is also important. There are sometimes links on local websites to central government websites and vice versa, but in principle local or central authorities provide information on benefits and services they provide and finance from their own budgets. Some of these stakeholders are responsible for policies and measures to ensure access to general and personalised information in several branches of social protection. Policies to ensure access to information in specific social protection sectors will be therefore explained in the sections relating to these sectors (unemployment, invalidity, pension insurance etc.).

The MLPSFSP covers several fields of social protection such as labour and (un)employment, the pension system, family policy and social welfare. The ministry's website is relatively complicated and contains several levels of information about rights. This means that users need to spend more time in order to access the information they are looking for, which can be found on the third or fourth level of sub-menus. In addition, this website primarily provides broader information on access to rights in the social welfare system (invalidity rights). General or personalised information on access to rights in the fields of pension insurance, family policy or unemployment is not available on the website of this ministry, but on the websites of the CPII, CES or the Central State Office for Demography and Youth. However, the ministry website provides an address book of social service providers, with current information on their name, postal address, e-mail address and telephone number by county and city. It also provides links to other institutions such as the CPII, CES, and the Institute for Expertise, Professional Rehabilitation and Employment of People with Disabilities. Information on social welfare rights is not available in English.

The CPII website provides information on access to pension insurance rights (old-age, disability, survivors', basic pensions, injuries, etc.) and some family benefits (child allowances). Employees, the self-employed and other citizens can get general and personalised information about each type of pension benefit through separate menus. Each of the menus offers detailed information on the conditions for exercising the right, the amount of benefits, etc. Pension calculators are also available for calculating different types of pensions. Through separate menus, citizens can get information and data on: international and domestic regulations on pension insurance; how to apply for, calculate and receive pensions; and where to find even more detailed information. Some pieces of information are accessible for blind people because they are available in the form of audio materials. Almost all the information on pension insurance rights on the website is available in English.

The government's e-citizens portal provides information on most social protection rights. Thus, in the "e-information" menu, citizens have access to general and personalised information related to benefits and services including compulsory and supplementary health insurance, pension insurance, social welfare, and unemployment protection. The comprehensiveness of information varies between areas of social protection. In addition, the e-citizens portal provides information on the addresses and web portals of institutions that are directly responsible for exercising the rights.

The CHII website provides general and personalised information on compulsory and supplementary health insurance rights and maternity and paternity benefits. Regarding healthcare, citizens have access to information on various aspects of healthcare (legal regulations, scope of rights, access to services, etc.). There is also a systematic overview of maternity and paternity benefits according to the employment status of users (contributory benefits for employees and the self-employed, and non-contributory ones for the unemployed and economically inactive people).

The MH is responsible for healthcare policy and the website provides general information on regulations and healthcare projects and programmes.

The CES provides general and personal information regarding unemployment protection, the unemployment benefits procedure and active labour market policies.

The CPII provides information on social protection rights in a user-friendly way; the language is simple and understandable, and the font size is appropriate for older people and similar groups. The same can be said for the CES. Information on the MLPSFSP website is not always adapted to people with lower education and digital skills. Administrative-legal language is sometimes used that is not easy understandable.

On the websites of many cities and municipalities information can be found on the social protection rights they finance from their own budgets, as well as on those financed from national sources. Local government websites can provide direct information on specific social rights or they can contain links, addresses and telephone numbers for institutions responsible for individual rights. However, there are differences in the provision of information on social protection rights between cities and municipalities, and between more developed and less developed local government units. Just as there are significant regional and local inequalities in access to social protection rights between local and regional government units (Babić and Šućur, 2022), so it can be assumed that there are differences in the availability of information on social protection rights.

1.1.1.1 Unemployment benefits

Regarding the availability of general information on how to exercise the right to unemployment benefits in Croatia, the CES provides it in a transparent manner through its website,¹ where phone contact information is also provided, including the phone numbers and e-mail addresses of regional CES offices. Information published on the CES website sets out in a clear and simple way, in detail, the essential conditions that need to be met by employees and the self-employed in order to be entitled to unemployment benefits.² More information on that is also provided in English for EU and other non-EU citizens. The CES web portal is multifunctional and also offers personalised information by using the e-citizen web platform and a facility to apply online or by e-mail for unemployment benefit (with scanned versions of necessary documents).

1.1.1.2 Sickness and healthcare benefits

On the CHII website, in the "frequently asked questions and answers" section, citizens, employees and the self-employed are informed about the rights they have under the

¹ <https://www.hzz.hr/en/services/rights-and-obligations-of-unemployed-persons/>

² <https://www.hzz.hr/usluge-poslodavci-posloprimci/prijava-u-evidenciju-nezaposlenih-2022/>

compulsory health insurance system and any supplementary health insurance that they contract for themselves.

Insured people are informed about benefits during temporary incapacity for work. It is explained how the benefit is calculated, what is the highest and the lowest amount, and in which cases 100% of the benefit is paid.

Personalised information can be obtained at CHII regional and local offices, and contact information can be found on the CHII website.

The activities of the Croatian Association for the Promotion of Patients' Rights (CAPPR)³ are aimed at: promoting patients' rights; creating preconditions for improving the protection of patients' rights; and providing information and advice on patients' rights.

Recent research covering a part of the CAPPR mission analysed 301 complaints about violations of patients' rights in 2017-2018. The most common complaint referred to the right of access to healthcare (35.3%), followed by the right to information (29.9%) and the right to safety (21.7%) (Karačić, Viđak & Marušić, 2021). The rights to information and to informed consent have been recognised in all Croatian laws regulating patients' rights since 1993. Patients have the right to information about their health, including the right to a second medical opinion, and the right to have information provided in an understandable way. The right to information was the second most often reported violation in this research, which may be related to the transition by the Croatian health system from a paternalistic to a partnership model. More transparency and a clear process for lodging complaints are needed to better understand patients' needs, resolve allegations, and prevent future complaints, thus increasing the quality and safety of the healthcare system.

1.1.1.3 Maternity and equivalent paternity benefits

Employed and unemployed people can be informed about their rights to maternity and paternity benefits via several institutions, such as the CHII, CPII, e-citizens portal or various associations. The CHII website⁴ contains data and information on the rights in a multilevel system (there are core menus on the homepage and sub-menus with detailed information on benefits). The legal regulations defining these rights are listed first, and for each right the general and specific conditions to be met are indicated, along with explanations relating to the amounts of benefits, timing of receipt, and circumstances that may lead to termination of benefits. Information on rights for employees and the self-employed is available separately. In addition, there is a repository on the website with frequently asked questions and answers related to individual rights and benefits, with separate menus for each kind. In addition, there is a section called "important information" which is related to the deadlines within which certain applications must be submitted.

The e-citizens and CPII portals also explain separately the access to maternity/paternity benefits for employees and the self-employed and for the unemployed or economically inactive. The e-citizens portal provides citizens with contact information on central and regional institutions in charge of these rights (postal addresses, telephone numbers and e-mail addresses).

1.1.1.4 Invalidity benefits

General and personalised information on access to various invalidity benefits is available on the websites of the MLPSFSP and a large number of social welfare centres, the CPII, the Ministry of Croatian Veterans, the official government website (e-citizens) and various associations of people with disabilities. The MLPSFSP website⁵ provides basic information

³ <https://pravapacijenata.hr/info-pacijenti>

⁴ <https://hzzo.hr/>

⁵ <https://mrosp.gov.hr/istaknute-teme/obitelji-i-socijalna-politika/socijalna-politika-11977/prava-u-sustavu-socijalne-skrbi-11978/11978>

on legal regulations that define the conditions for exercising invalidity benefits in the social welfare system (e.g. personal disability allowance and various services), the application procedures, the amount of benefits and the like. However, the conditions for the acquisition and loss of rights are not explained in detail, and potential beneficiaries are referred to the laws and regulations defining these rights. It is noticeable that some data and information on benefits have not been updated to reflect recent legal changes.

The CPII has a website⁶ with comprehensive information and data on the invalidity benefits it pays. Users have access to a multilevel information system with an overview of rights, and detailed information on individual rights (disability pensions, compensation for bodily impairment, etc.). The sub-menus provide an insight into domestic legislation and international agreements (including EU regulations), the application process (including the application form that can be downloaded or printed), the procedure for calculating benefits, and the possible ways of paying benefits. All application forms in PDF are available in a separate menu. In addition, the CPII publishes a few publications that explain in a comprehensive and simple way the structure of individual branches of social security (e.g. a pension guide). Most of this information is also available in English. In addition to the website, the CPII responds to citizens' questions via phone and e-mail.

The government's e-citizens portal⁷ also provides information on the conditions relating to invalidity benefits in the social welfare system (e.g. who is entitled to benefits, the amount of benefits, and a brief description of the application procedure), and on invalidity benefits in the jurisdiction of the CPII. In addition, this portal offers contact information (postal addresses, telephone numbers and e-mail addresses) of institutions directly responsible for the exercise of rights. However, the information is not always up-to-date and in line with any changes in legislation (some outdated data may remain for months after the legislation is changed).

Detailed information on the rights of people with disabilities within the social welfare system can also be found on the websites of many social welfare centres. People can get information there about the criteria for exercising the right or the procedure itself. In addition, forms that need to be completed and submitted to exercise certain rights may be available on those websites. However, some pieces of information can be outdated or invalid.

There is no clear or concise information on the rights to invalidity benefits on the website of the Ministry of Croatian Veterans; but the laws, regulations and decisions important for the exercise of these rights are listed. On the other hand, information is available on where and how potential users can contact the Ministry (by e-mail, phone and post).

1.1.1.5 Old-age benefits and survivors' benefits

The CPII website contains general information on old-age benefits and the length of service and age required to access them. There is also information on the conditions for exercising the right to survivors' benefits, as well as who is entitled to them. There are instructions for each category of pension on how to calculate the amount of pension. Additional information can be obtained by telephone and e-mail.

The Croatian Pensioners' Union (CPU) is a civil society association that fights to realise the social, economic, and civil rights of pensioners and older people.⁸ It provides information on the pension and health rights of pensioners and older people on a regional basis. It also publishes "Voice of Pensioners" (*Glas umirovljenika*) on a monthly basis, and is very active and visible as an advocate and source of information in respect of benefits for older people.

⁶ <https://www.mirovinsko.hr/>

⁷ <https://gov.hr/hr/prava-i-usluge-za-osobe-s-invaliditetom-iz-sustava-socijalne-skrbi/252>

⁸ <https://www.suh.hr/>

1.1.1.6 Benefits in respect of accidents at work and occupational diseases

The procedure for determining and recognising an accident or disease related to work, and related benefits, can be initiated by submitting predefined forms, which are available on the CHII webpage⁹ under the headings "Reporting an injury at work" and "Reporting an occupational disease". Since 2017 it has been possible to apply online by filling in these forms, which should be submitted to the competent CHII regional office according to the claimant's place of residence. The process for making an application, including the documents needed, is transparently explained on the CHII webpage.

1.1.2 General awareness-raising campaigns

This section describes initiatives targeted at improving information about the conditions and rules of access to one or more of the six branches of social protection. However, there are few examples of awareness-raising campaigns in Croatia related to the access to social protection rights. This topic is poorly addressed in the media and in academic papers.

1.1.2.1 Unemployment benefits

There is no information available regarding unemployment benefit awareness-raising campaigns.

1.1.2.2 Sickness and healthcare benefits

There is no information available regarding general awareness-raising campaigns on sickness and healthcare benefits in the period covered by the present report.

1.1.2.3 Maternity and equivalent paternity benefits

There is no information available regarding general awareness-raising campaigns on maternity and equivalent paternity benefits in the period covered by the present report.

1.1.2.4 Invalidity benefits

There is no information available regarding general awareness-raising campaigns on invalidity benefits in the period covered by the present report.

1.1.2.5 Old-age benefits and survivors' benefits

The Central Register of Insured People (REGOS) and the CPII established and equipped pension information centres (MICs) in larger cities as part of the "My Pension – Improving REGOS Services on the Labour Market" project, co-financed by the European Social Fund in 2019. Specially trained staff from these two institutions provide citizens and entrepreneurs with all the information about the pension insurance system.¹⁰

Workers in MICs answer citizens' questions about choosing or changing their pension fund, and provide information on: receipts and contributions paid for pension insurance; the turnover and balance on personal accounts; registrations and cancellations of insurance; the status of cases in the CPII; exercising the right to pension insurance and the right to child allowance; the choice of pension; e-services of the CPII; and closing a personal account. In addition, citizens can submit various applications and get various certificates in paper form.

At MICs, entrepreneurs can also get basic information on the calculation and payment of pension contributions, professional assistance related to resolving unrelated payments of

⁹ <https://hzzo.hr/ozljede-na-radu-i-profesionalne-bolesti-specificna-zdravstvena-zastita>

¹⁰ <https://www.mirovinsko.hr/hr/mirovinski-informativni-centri-na-jednom-mjestu-gradjani-mogu-dobiti-odgovore-na-sva-pitanja-o-mirovini/1710>

pension contributions, and unrelated payments to the second pillar scheme recorded on a temporary invoice. They can also obtain various documents in paper or electronic form.

MICs are becoming a key source of information and educational activities, playing an important role in improving pension literacy (essential for planning the financial future of citizens).

Mandatory pension funds and the Croatian Financial Services Supervisory Agency invest significant funds in financial literacy programmes for citizens. These are mostly geared towards promoting savings in the second mandatory pillar of pension savings and in the third voluntary pillar. Mandatory pension funds provide extensive information for their members and citizens on their webpages.¹¹

1.1.2.6 Benefits in respect of accidents at work and occupational diseases

There is no information available regarding awareness-raising campaigns around benefits in respect of accidents at work and occupational diseases.

1.2 Policies and practices to simplify access to social protection

1.2.1 Simplification objective embedded in reforms of social protection schemes

1.2.1.1 Unemployment benefits

Changes under the Employment Mediation and Unemployment Rights Act of 2017 (Official Gazette 16/2017, in force from 2 March 2017) were aimed at simplifying procedures and easing access in respect of unemployment benefits for craftspeople and the self-employed.

This law stipulated that the right to unemployment insurance covers, among other groups, self-employed people such as craftspeople and sole traders who are entered in the appropriate register. This puts craftspeople and self-employed people on the same footing as regular employees, in terms of unemployment protection rights and obligations.

Until February 2022, the “up-to-employment allowance” (a non-contributory unemployment benefit for people with disabilities) was regulated by the Social Welfare Act, and decisions on granting it were made by social welfare centres. In February 2022 the benefit was renamed as financial assistance for unemployed people with disabilities, and it has since then been regulated by the Labour Market Act (Amendments to the Labour Market Act, OG, 18/2022) and administered entirely by employment offices – which simplifies the procedure. (In any case, this right by its nature does not belong to the social welfare system.)

1.2.1.2 Sickness and healthcare benefits

There is no information available regarding sickness and healthcare benefits.

1.2.1.3 Maternity and equivalent paternity benefits

There is no information available regarding maternity and equivalent paternity benefits.

1.2.1.4 Invalidity benefits

The up-to-employment allowance, a non-contributory unemployment benefit aimed at unemployed people with disabilities, was transferred in 2022 from the social welfare system to the unemployment protection system (under the CES) (see Section 1.2.1.1).

¹¹ <https://www.rm.f.hr/financijska-pismenost-490/490> and <https://www.hanfa.hr/edukacija-i-potro%C5%A1a%C4%8Di/financijska-pismenost/>

1.2.1.5 Old-age benefits and survivors' benefits

There is no information available regarding old-age benefits or survivors' benefits.

1.2.1.6 Benefits in respect of accidents at work and occupational diseases

The system of workplace health and safety protection in Croatia was reformed by the Occupational Health and Safety Act in 2014, which was subsequently amended in October 2018. Atypical workers and the self-employed (including people who are not employed by an employer, but perform some tasks or receive training on employers' premises) are covered by the provisions of the Act and by related benefits for accidents at work and occupational diseases. Legislative changes in October 2018 simplified some procedures related to occupational health and safety, and also involved amendments relating to worker participation in risk assessment and the size and composition of the National Council for Occupational Health and Safety.

1.2.2 Simplification of the application process for accessing benefits

1.2.2.1 Unemployment benefits

Simplification of the application process for unemployment benefits in Croatia was a consequence of the COVID-19 restrictions, when social contacts were limited. After February 2020, the CES simplified the procedure so that people could apply online for unemployed status (by e-mail), and also for unemployment benefits (by scanning the documents required and sending them by e-mail), whereas until 2019 the application for unemployment benefits had been possible only in person.¹²

1.2.2.2 Sickness and healthcare benefits

During the COVID-19 pandemic the CHII made noticeable improvements in electronic communications, to simplify and speed up application processes in cases of sickness and access to healthcare benefits.

1.2.2.3 Maternity and equivalent paternity benefits

Due to the COVID-19 pandemic, the CHII made it possible (exceptionally) to apply for maternity and parental benefits electronically.

From 3 July 2020, citizens could submit applications for child allowance through the e-citizens platform.

1.2.2.4 Invalidity benefits

The applications for invalidity benefits delivered by the CPII can be submitted to the regional offices and branches of the CPII, according to the place of residence of the applicant, or free of charge at post offices in the Republic of Croatia. They can also be submitted orally or via e-services.

At the beginning of the COVID-19 pandemic, personal medical examinations as part of the process for establishing invalidity status were cancelled, and decisions were taken on the basis of medical documentation only. However, according to the Ombudsperson for People with Disabilities (2020) there were violations of the rights of people with disabilities, due to the fact that decisions were based on incomplete medical documentation. According to the previous practice, applicants submitted only a small part of the medical documentation along with their basic application, whereas they submitted the entire set of documents to the experts for inspection during the personal medical examination or assessment. According to the Institute for Expertise, Professional Rehabilitation and Employment of

¹² <https://hzz-helpdesk.kadei.cloud/207569-Zanima-me-dali-se-na-burzu-mo%C5%BEE-prijaviti-putem-maila-ili-se-mora-dolaziti-osobno->

People with Disabilities, during the pandemic (2020 and 2021), in 70% of cases decisions were taken on the basis of medical documentation only, and in 30% of cases the expertise included a personal examination. Basing decisions on documentation only shortened the time taken by the procedure, but the number of complaints about the quality and objectivity of expert assessments increased (Ombudsperson for People with Disabilities, 2021).

1.2.2.5 Old-age benefits and survivors' benefits

During the COVID-19 pandemic the CPII improved electronic communications in order to speed up processes in respect of old-age and survivors' benefits.

1.2.2.6 Benefits in respect of accidents at work and occupational diseases

From 1 October 2017 the application procedure was simplified, in that the CHII was obliged to accept legal applications for benefits in respect of accidents at work and occupational diseases in online form. Under this simplification, employers – who are required (according to Compulsory Health Insurance Act) to report injuries at work or occupational diseases for their employees – have been able to submit applications electronically if they have a valid electronic signature, in accordance with the provisions of the Electronic Signature Act.

1.2.3 Simplification of the structures within the social protection administration

1.2.3.1 Unemployment benefits

There is no information available regarding unemployment benefits.

1.2.3.2 Sickness and healthcare benefits

There is no information available regarding sickness and healthcare benefits.

1.2.3.3 Maternity and equivalent paternity benefits

There is no information available regarding maternity and equivalent paternity benefits.

1.2.3.4 Invalidity benefits

With the establishment of the Institute for Expertise, Professional Rehabilitation and Employment of People with Disabilities in 2014, the concept of a single and independent expert body was introduced for the first time.¹³ With this change the expert procedure became focused exclusively on objectively determining the functional status of people with disabilities, with the aim of creating opportunities for them in the labour market and enabling them to exercise their rights in different branches of social protection. Until 2015, invalidity and disability expertise was provided in six different systems based on 14 different regulations. Following the establishment of the institute and the adoption of the Law on the Single Expertise Body, in 2017, the Regulation on Expertise Methodologies (Official Gazette, 67/2017) was adopted. It was aimed at regulating the manner and the procedure for obtaining an expert opinion on invalidity status in different fields of social protection, including: social welfare; pension insurance; the professional rehabilitation and employment of people with disabilities; and the protection of civilian victims of war.

The establishment of the institute, and the adoption of the regulation, created the conditions in principle for people with disabilities to automatically exercise their rights in all systems on the basis of one finding and expert opinion. However, this has not happened in practice so far.

¹³ The Law on the Single Expertise Body, OG, 85/2014, 95/2015.

In order to promote the rights and interests of people with disabilities and bring it closer to citizens, the Office of the Ombudsperson for People with Disabilities has established three regional offices in Osijek, Split and Rijeka. The Osijek regional office started operating at the beginning of November 2018 and covers the area of eastern Croatia. The Split regional office has been operating since September 2019, and the Rijeka regional office since the autumn of 2020. The Split and Rijeka regional offices mainly cover the Adriatic coastal area. Because of a lack of information and problems in accessing their rights, citizens with disabilities can contact the central and regional offices in several ways: by mail, telephone, e-mail or by visiting the offices for an interview.

1.2.3.5 Old-age benefits and survivors' benefits

There is no information available regarding old-age benefits or survivors' benefits.

1.2.3.6 Benefits in respect of accidents at work and occupational diseases

There has been no simplification of the administrative structure for benefits in respect of accidents at work and occupational diseases.

2 Issues, debates and ongoing or planned reforms to ensure information on, and to simplify access to, social protection for workers and the self-employed

2.1 Issues, debates and reforms related to information

2.1.1 Issues

The CPII website contains general information on old-age benefits, including the length of service and age required to access them. There is also information on the conditions for exercising the right to survivors' benefits, as well as who is entitled to them. There are instructions, for each category of pension, on how to calculate the amount of pension. Additional information can be obtained by telephone and e-mail.

Dissatisfaction on the part of people with disabilities, due to poor access to services and insufficient information in the parts of Croatia away from Zagreb, has triggered several initiatives to establish regional offices of the Ombudsperson for People with Disabilities (there are now three regional offices, in Split, Rijeka and Osijek) (Ombudsperson for People with Disabilities, 2018).

The conditions for the acquisition and loss of rights are not always explained in detail on the websites of responsible institutions, and potential beneficiaries are referred to the laws and regulations defining these rights. Additionally, it is noticeable that some data and information on benefits on the websites have not been updated and harmonised with new legal changes. For example, information on invalidity benefits on the MLPSFSP portal or on the websites of many social welfare centres has not been updated to reflect the new Social Welfare Act, which entered into force in February 2022 and changed the conditions for exercising the rights to, and the amounts of, benefits.

The CAPPR programme points out that Croatia has not yet established effective protection of patients' rights. It has also not established adequate education in the field of health law, and the existing amount of knowledge in Croatia is extremely low and certainly insufficient for the needs of Croatian patients. Patients have more and more questions about their rights and fewer opportunities to get answers, because of insufficiently trained experts to give them advice. The CAPPR has therefore recognised that its subsidiary activities, providing advice and information to patients, should be significantly strengthened to help institutions to establish effective ways to protect patients' rights more quickly. The CAPPR

provides personalised assistance in the form of advice, information and/or psychological support.

2.1.2 Debates

No information is available on ongoing debates on the issues discussed in the present report.

2.1.3 Ongoing or planned reforms

We have not identified any ongoing or planned reforms aimed at improving access to general and personalised information in relation to the benefits discussed in the present report.

2.2 Issues, debates and reforms related to simplification

2.2.1 Issues

The issue of simplifying social protection benefits often features at national and regional round tables or meetings dealing with benefits and the rights of people with invalidity, because these people can exercise the same or similar rights in different areas of social protection.¹⁴ There are therefore frequent requests for the introduction of a benefit that would replace a number of similar benefits for people with invalidity. An “inclusive allowance” is most frequently mentioned as an example of such a benefit.

2.2.2 Debates

For a long time there have been discussions at political and institutional level¹⁵ about the introduction of an inclusive allowance (*Inkluzivni dodatak*) for people with disabilities. One of the objectives of the inclusive allowance is to make the system of benefits for people with disabilities more transparent, simpler and more accessible by merging most existing rights for people with disabilities into one benefit. Accordingly, it is important to make a decision about the rights to be included in the inclusive allowance and about the role of the means test¹⁶ in the future benefit. These debates refer to the 2019 Council Recommendation,¹⁷ because the inclusive allowance would cover people with invalidity (including employees and the self-employed).

2.2.3 Ongoing or planned reforms

Regarding benefits for people with disabilities, the objective is to update and improve the system for obtaining expert opinions, with the ultimate goal that people with disability can realise their rights in all systems automatically based on a single expert opinion. Another objective is to simplify the system of benefits by merging several benefits into one benefit. A key party in the ruling coalition – the Croatian Democratic Union – promised in its election programme (“Safe Croatia: Programme for the elections for the Croatian Parliament 2020”¹⁸) to introduce an inclusive allowance that would merge all or most of the rights of people with disabilities by the end of 2021. However, as this did not happen, the competent minister in February 2022, after the adoption of the new Social Welfare Act, again

¹⁴ <https://www.hsucdp.hr/financiranje-udruga-inkluzivni-dodatak-i-usluge-pomagaca-gdje-smo-i-sto-ocekivati/>

¹⁵ Several round tables were organised by the MLPSFSP, the Ombudsperson for People with Disabilities, and by organisations of people with disabilities (<https://www.hsucdp.hr/financiranje-udruga-inkluzivni-dodatak-i-usluge-pomagaca-gdje-smo-i-sto-ocekivati/>).

¹⁶ See more on the debates related to the inclusive allowance in Bežovan, Šućur and Babić (2022).

¹⁷ Council of the EU (2019).

¹⁸ https://hdz.hr/userfiles/pdf/Sigurna_Hrvatska_Program2.pdf

announced that the government intends to adopt a law on the inclusive allowance by the end of its term (2024).

2.3 Suggestions for improvements

Given that citizens do not have enough information about their social rights, awareness-raising campaigns about their rights in various areas and branches of social protection are needed. In addition, media campaigns should be mandatory when the existing legal regulations change significantly, and especially when new laws are passed. There is an obvious need to improve patients' healthcare literacy.

In order to improve access to social protection rights, a system should be set up to ensure automatic access to rights in different sub-systems by sharing the necessary information between them, so avoiding the need to apply to each one separately.

References

- Babić, Z., Šućur, Z. (2022). The Matthew Effect in Local Welfare Policy in Croatia, *Hrvatska i komparativna javna uprava [Croatian and Comparative Public Administration]*, 22(1), 159-186. Available at: <https://hrcak.srce.hr/file/399748>.
- Bežovan, G., Šućur, Z. and Babić, Z. (2022). ESPN Thematic Report on Social protection for people with disabilities – Croatia, European Social Policy Network (ESPN), Brussels: European Commission.
- Council of the EU (2019), "Council Recommendation of 8 November 2019 on access to social protection for workers and the self-employed", 2019/C 387/01. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32019H1115%2801%29>.
- Karačić, J., Viđak, M. and Marušić, A. (2021). Reporting violations of European Charter of Patients' Rights: Analysis of patient complaints in Croatia. *BMC Med Ethics* **22**, 148. Available at: <https://doi.org/10.1186/s12910-021-00714-3>.
- Ombudsperson for People with Disabilities (2018). Izvješće o radu Pravobranitelja za osobe s invaliditetom u 2018 [Work report of the Ombudsperson for people with disabilities in 2018]. Available at: <http://posi.hr/wp-content/uploads/2019/04/Izvje%C5%A1%C4%87e-o-radu-Pravobranitelja-za-osobe-s-invaliditetom-za-2018.-godinu.pdf> (accessed 25 April 2022).
- Ombudsperson for People with Disabilities (2019). Izvješće o radu Pravobranitelja za osobe s invaliditetom u 2020 [Work report of the Ombudsperson for people with disabilities in 2019]. Available at: <https://posi.hr/wp-content/uploads/2020/04/Izvje%C5%A1%C4%87e-o-radu-POSI-za-2019.pdf> (accessed 25 April 2022).
- Ombudsperson for People with Disabilities (2020). Izvješće o radu Pravobranitelja za osobe s invaliditetom u 2020 [Work report of the Ombudsperson for people with disabilities in 2020]. Available at: <https://posi.hr/wp-content/uploads/2021/04/Izvjescje-o-radu-Pravobranitelja-za-osobe-s-invaliditetom-za-2020.-godinu.pdf> (accessed 25 April 2022).
- Ombudsperson for People with Disabilities (2021). Izvješće o radu Pravobranitelja za osobe s invaliditetom u 2021 [Work report of the Ombudsperson for people with disabilities in 2021]. Available at: <https://posi.hr/wp-content/uploads/2022/04/Izvjescje-o-radu-Pravobranitelja-za-osobe-s-invaliditetom-za-2021.-godinu.pdf> (accessed 25 May 2022).

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