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# Better Private Security in Serbia Remains a Far Cry

Main developments in private security in Serbia and policy recommendations

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The private security sector in Serbia was finally regulated in November 2013, when the Serbian National Assembly adopted the Law on Private Security (hereinafter Law on PSC). Due to the fact that it took two decades to regulate this sector, the general public as well as experts had high expectations for the Law. It was almost publicized as a panacea to all problems related to private security. The greatest expectation however was related to training and licensing of PSC staff, as well as licensing private security companies (PSCs). Such a process should result in an accurate and transparent profile of the private security sector, as well as in better trained and professional security guards, which in turn should contribute to increased citizen safety. However, after almost three years of implementation none of the expected results were realized nor will they be achieved within a set timeframe; leaving private security today where it was before the Law. This should be attributed not only to flaws in the Law but also to its poor implementation by both the Ministry of Interior (MoI) and PSCs. Due to this, positive spill over effects to other aspects of private security work have been left out, and as a consequence private security is fraught with old problems. Furthermore, these problems cannot be solved without prior and proper completion of licensing. In the following pages we will analyse key issues in the governance of private security and will propose recommendations for addressing them.

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# Defining PSCs services and relationship with public tasks

## *Better definition of services*

The Law on PSCs prescribes that PSCs cannot conduct services reserved for police and military. Additionally, it clearly specifies that PSCs cannot “collect debts”. PSCs are currently merging their services on the market, usually offering security along with maintenance/cleaning services (the latter service also being outsourced on the market, and obtained through public procurement). The services PSCs are entitled to perform are the following: protection of persons and property by physical and technical means (not covered by statutory actors), protection of cash in transit, and maintenance of order on public and sport events.<sup>1</sup> In accordance with the law, PSCs cannot use methods and means used by the police.

The key challenge is whether the State can rely on PSCs as a partner in ensuring safety and security of its citizens. The National Security Strategy of Serbia defines the role of PSCs in the protection of persons, property and material assets which are not protected by the state,<sup>2</sup> keeping certain tasks of security within the public domain. However, regarding the tasks that PSCs can perform, Serbia is not counting on PSCs to their full potential, whatever skills and expertise this sector may possess. For example, for emergency situations the State lists 353 companies, determining them as “authorized and trained legal entities for protection and rescue in Serbia”, none of which are a PSC.<sup>3</sup> The skills of PSCs to fulfil this role were demonstrated in practice during floods of 2014, when a number of those companies assisted and helped to contain the floods.

## *Protection of critical infrastructure*

Protection of critical infrastructure is a challenge in Serbia. Until recently, protection was provided by in-house security, while now most of services are being outsourced in a restructuring process.<sup>4</sup> The Law on private security recognizes “mandatory secured facilities”, defining them as “objects of strategic importance for Serbia, whose damage or destruction would seriously affected lives of Serbian citizens or would jeopardize the country’s defense.”<sup>5</sup> There are two clear deficiencies with this formulation within the Law; first, there is a lack of a proper definition of critical infrastructure (and thereby a lack of harmonization of different laws and bylaws), which second has the consequence of a lack of proper criteria for protection that should be stricter than protection of “uncritical” infrastructure.

Some assets demand higher quality of the staff (nuclear facilities, hydro power plants, thermal power plants, etc.), detailed procedures and cooperation with police and other relevant actors. Another problem is that the current system of public procurement (involving one year contracts) does not help to ensure a proper level of protection as PSCs that win the contract are not motivated to invest in the protection of facilities, given that there is no guarantee that the contract will be renewed past the first year. The solution might be found in public-private partnerships, where the law that regulates this envisages contracts which last for at least 5 years. However, the state is hesitant to commit to this because it is afraid of a lack of control over the arrangements. On the other hand, PSCs would be motivated to invest more in already the first year (equipment, procedures), having the security of a long-term contract, which would pay off in long run, something that is not feasible in current public procurement cycles. The bottom line is that without proper legally binding standards with sufficiently specific criteria, and without market incentives to upgrade existing security, critical infrastructure lacks proper protection.

1 Law on Private Security, Official Gazette RS 104/2013 and 42/2015, art. 2

2 National Security Strategy, Official Gazette RS 28/2009 p. 24

3 Decision on Determining Authorized and Trained Legal Entities for Protection and Rescue in Serbia, Official Gazette RS 36/2011

4 See case study on Djerdap Hydropower Plant. Milosevic M., Petrovic P., „Privatising the Security of Critical Infrastructure in Serbia – The Case of Private Security at the Hydropower Plant Djerdap“ In: Klopfer, F., Amstel, N. (eds.), (2016), Private Security in Practice: Case studies from Southeast Europe, DCAF, Geneva.

5 Law on Private Security, Official Gazette RS 104/2013 and 42/2015, art. 4-5

*What (not) to outsource?*

There are some doubts regarding what PSCs can or cannot protect. Currently there are a few security challenges to which PSCs may be able to contribute, but their ability to provide security in the sensitive areas needs to be thoroughly discussed.

There is currently a demand for more prisons in Serbia, and PSCs see an opportunity for investment in this area, but current laws forbid outsourcing of this activity. This is not uncommon known worldwide, “we build prison facilities according to EU standards, but we usually sign the contract for 20 years, to have feasibility [sic].”<sup>6</sup> The advantages of such a system are that costs are known from the start (cost of a prisoner per day), so the budget can be planned well in advance. An additional benefit would be the attached transportation of prisoners: currently the Ministry of Justice lacks resources for transportation of prisoners, and sometimes court cases are delayed as prisoners could not be escorted. PSCs can take on this service as well “so everyone benefits”.<sup>7</sup> On the other hand, one multinational company currently protects the nuclear facility Vinča, and they secured the transportation of a radioactive reactor to Russia. As their manager explained “it was (publicly) unknown that our company provided security for the transportation, as everyone believed that was the task of the state. And now people ask questions whether the private sector can protect critical infrastructure?” They constantly protect transportation of dangerous/toxic material through Serbia. Moreover, that transportation has a regional dimension as they secure such transports from Austria through Hungary, Serbia, and Romania up to Turkey. “We are eligible for such tasks, compatible to various security requirements in different countries”.

Another challenge is piracy on the Danube River. As an international waterway, it is used by various countries to transport goods. On this waterway the police are underequipped: until recently they had only one boat which was not operational<sup>8</sup> to patrol 588km of the Danube in Serbia. They were donated one more boat<sup>9</sup> but it is yet to be seen how much this contribution will do for the efficiency and efficacy of police patrol. The Customs department has a 6-man team with one rubber boat to oppose smugglers on this same waterway.<sup>10</sup> This lack of provision of security was recognized as an opportunity by smugglers and pirates and their activities increased.<sup>11</sup> Unable to cope with such challenges and not being able to rely on police protection, some companies hired PSCs to protect their assets. Until January 2012, US Steel, while operating in Serbia, had in-house security that also had the task of protecting their commercial fleet and its cargo. This is a clear example where a gap between public provision of security and potential risks was filled by PSCs.

*Recommendations*

The following are a list of recommendations stemming from the analysis of private security development in Serbia:

- Clearly defined services for PSCs indicating what they are and are not allowed to perform, while encouraging participation in areas where their use can be explored more sufficiently, such as in emergency situations;
- Enabling implementation of public-private partnership by adaptation of long term financial plans (critical infrastructure asset’s budgets, compliance with Ministry of Finances) could result in more clearly defined and fairer procurement practices;
- Control mechanisms to monitor PPP can be used in order to provide accountability and feasibility to counterbalance the longer duration of contracts;

<sup>6</sup> Respondent, multinational company, January 2015

<sup>7</sup> Ibid.

<sup>8</sup> Večernje Novosti 26.9.2014. Smederevo: Pirati haraju na Dunavu, available <http://www.novosti.rs/vesti/srbija.73.html:511844-Smederevo-Pirati-haraju-na-Dunavu>

<sup>9</sup> B92, 26.3.2016. MUP dobio deset borbenih ovozila i čamac, available [http://www.b92.net/info/vesti/index.php?yyyy=2016&mm=03&dd=26&nav\\_id=1112313](http://www.b92.net/info/vesti/index.php?yyyy=2016&mm=03&dd=26&nav_id=1112313)

<sup>10</sup> Politika, 3.8.2016. Lovci na krijumčare nafte, available <http://www.politika.rs/scc/clanak/360449/Lovci-na-krijumcare-nafte>

<sup>11</sup> B92. 7.12.2015. Pirati sa Dunava, available [http://www.b92.net/zivot/vesti.php?yyyy=2015&mm=12&dd=07&nav\\_id=1071656](http://www.b92.net/zivot/vesti.php?yyyy=2015&mm=12&dd=07&nav_id=1071656)

- Better definition of critical infrastructure protection<sup>12</sup> and roles and duties of PSCs in this area is necessary;
- There is a wider need for public discussion on the basis for and safeguards surrounding the use of PSCs for security challenges that are currently not addressed, such as prisoner transportation and anti-piracy operations.

## Private security companies, service, and politics & government

### *Political parties before the state, society and citizens*

Ties with ruling political parties have always played a decisive role in expanding private business in Serbia, as they open possibility for PSCs to find clients in the public sector and offer their services to a number of state institutions. Doing business with state institutions is even more important today given the fact that private businesses in Serbia have been declining steadily since the economic crises hit the global economy in 2007. It is estimated that around 45% of contracts for physical technical protection are concluded with state institutions. “State institutions are slow in paying the bills, but they always pay in the end. It is safe and predictable to do business with the state. Also, when working with the state you can engage the write-off security guards<sup>13</sup>”. Through these contracts almost 80% of all private security guards (physical protection) is engaged. Private clients tend to invest more in technical protection combined with mobile teams which is more expensive in the beginning but pays off in mid or long term. On the other hand, it is much easier to earn extra-profit by engaging physical instead of technical protection.

More importantly, political ties guarantee more lax oversight and control of numerous state institutions over private security companies’ work and conduct. In practice that means that ‘political’ companies can resort to illegal or semi-legal practices in order to maximize the profit and side line the competition. In the following pages, we will describe the main elements of such a strategy.

### *Unrealistically low prices go unpunished*

It is not an unusual practice for politically aligned PSCs to win on the tender for providing security for state institutions by offering an unrealistically low bid. For instance, in 2014 the Tax Administration procured private security for only 158RSD (~1.35€), a price by which it would obviously be impossible to pay all state taxes. According to an analysis produced by the Association of Private Security the lowest possible realistic price was 255RSD (~2.25€) at that time. PSCs can generate profit while receiving unrealistic prices only by resorting to illegal or semi-legal mechanisms: engaging fewer guards than contracted, forcing guards to return a part of their salary to the company, contracting staff on the basis of vocational improvement, and not paying taxes for the guards. The example of the Tax Administration does not stand alone, but it is very illustrative how pervasive political influence in Serbia functions since the staff of this institution knew well that with the unrealistically low prices they paid, not even the taxes could be covered.

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<sup>12</sup> This issue is covered in greater detail in: Milosevic M., Petrovic P., „Privatising the Security of Critical Infrastructure in Serbia – The Case of Private Security at the Hydropower Plant Djerdap“ In: Klopfer, F., Amstel, N. (eds.) (2016) Private Security in Practice: Case studies from Southeast Europe, DCAF, Geneva.

<sup>13</sup> In this comment, a PSC manager interviewed by the authors refers to “write-off security guards“ who are employed by the PSC to protect public property, however the quality of the services they deliver is very low. This would be impossible to do with private clients given the demand for higher quality services.

### *Failure of almost all oversight instances*

Such illegal and semi-legal practices are possible only by strong political backing, which is present in all control and oversight instances. Political parties that win elections and form the government appoint loyal personnel in key positions in state institutions and state owned/controlled businesses even at the lowest managerial levels.<sup>14</sup> They are the entry points for doing business with selected PSCs, making tender documentations and deciding if the winning criteria would in fact be the lowest price or value for money. They also make the final decision whether unrealistically low price can be accepted, but do not control whether the companies follow all the legal and contractual obligations.

Loyal party members and supporters working in other controlling institutions turn a blind eye to such practices. It was noted that the Labor Inspectorate thoroughly inspected PSCs close to the former regime and were negligent or very mild toward PSCs linked to the current government, even though some PSCs were forming “new” companies by adding “plus” to the old name and registering it with this extension in order to create a “clean” company without any debts toward clients and workers. For more than a decade, private security guards have been lodging complaints against such companies (such PSCs usually did not pay employees for months) but with little effect. The only sanction that such companies can suffer is the change of government to one they are not aligned with, which is when their business could start to decline. Unfortunately that is of no use to unpaid private security guards. The Labor Inspectorate refused to disclose information or findings on which PSCs were influenced by political parties and any irregularities found in PSCs - in this way they are protecting “their own men”.

A similar practice can be observed within the Commission for Protecting Bidders’ Rights, which has not sanctioned irregularities (unrealistically low price) reported by bidders. “They are using different criteria for the same subject. Sometimes the same or a similar price is unrealistically low while at other times it is not.”<sup>15</sup> It is no surprise that PSCs reluctantly participate in tenders without political ties and when they do take part they do not file complaints to the Commission for unfair competition: “If I make a noise, my chances of doing a business in the future are slim.”<sup>16</sup>

The Committee for Defense and Internal Affairs Control has a limited mandate in overseeing the PSCs since they are private businesses, but it can influence private security through regulation and by overseeing the MoI which is mandated with the implementation of the Law on Private Security. However, as with other oversight institutions, political loyalty dominates over loyalty to state and society, the Committee has not requested reports from the MoI about the dynamics of the implementation of the Law on Private Security. BCSP’s research identified that intertwining of political parties and PSCs were one of the main reasons that it took 20 years to regulate the private security industry. Unregulated private security has enabled PSCs to employ semi-legal and illegal tactics to earn extra profit under the protection of politicians – now that there is a law, the implementation is impaired by the same political interlinkages.<sup>17</sup>

### *PSCs forced to employ political party staff*

Recent parliamentary and local elections in Serbia in April revealed another pervasive mechanism of how political parties meddle in private security business. In some municipalities where changes of ruling parties occurred following elections, a change in the PSC providing services to a municipality building was among the first measures undertaken by new ruling party. However, the contract with the private security company was not cancelled since this would be very difficult, but instead the PSC had to replace private security staff guarding the building.

Many of the private security guards had been working there for many years, but the new ruling political party wanted to have security guards loyal to them. In this way, political parties also provide jobs for their members and their relatives. Furthermore, employing unemployed persons from the National employment office awards a company 60% tax return for a certain period, providing further incentive. The party’s added

<sup>14</sup> For information on state corruption in Serbia please see “Serbia: Overview of Political Corruption” by the Anti-Corruption Helpdesk, Transparency International, 2014

<sup>15</sup> Petrovic P., Milosevic M. (eds.) (2015) Novi-stari izazovi privatnog sektora bezbednosti, BCBP, pp. 76-77.

<sup>16</sup> Ibid

<sup>17</sup> Ibid

value is that those who got a job will continue to vote for them. Political parties also pressure PSCs that are providing security to other state institutions, state owned business and critical infrastructure to employ their members or supporters. In order to avoid “disagreements” with political party strongmen, PSCs usually accept this practice. In this way they are trying to prevent labour inspections and other controls for some time, and it might open the door for working with state. Even larger companies cannot resist these pressures.

### *(Im)possibility to address politicisation*

Illegitimate influences of political parties on private security are well known, but it proves very difficult to address them because they are not sector specific.

The mechanisms of illegitimate influences of politics on private security are well known. The main issue here is how this problem can be solved or at least diminished. This is a very difficult task for two main reasons. Firstly, this problem is not specific for private security but is widespread and deep rooted in almost all aspects of life in Serbia. Secondly and more importantly, almost all policy recommendations intended for remedying this problem are to be implemented by the ruling parties, being the actors that are responsible for these problems. The only strategy that remains is to exert constant pressure on the government by revealing research findings disclosing the damaging influence of politics on private security and society.

- It is of utmost importance to increase transparency of all stakeholders. The Labor Inspectorate has to be compelled to regularly make data publically available on conducted controls: which PSCs were controlled; what irregularities and in which PSCs were registered; what sanctions and to which PSCs were they issued.
- Cooperation with the Commission for Free Access to Information is very important, as is cooperation with media, which can spread the findings to a broader public.

## Professionalism and standards of operations

### *Unsuccessful licensing of PSCs*

Even though the Law on Private Security was adopted in November 2013, by August 2016 only 1788 individuals and 8 PSCs obtained licenses.<sup>18</sup> This is extremely low given the fact that estimates suggest that there are between 40’000 and 50’000 private security personnel and 300 companies that are to be licensed, as well as that no less than 91 training centres exist,<sup>19</sup> and that the deadline for completing licensing was extended from April 2015 to January 2017. But even worse, research findings obtained through interviews with individuals who completed the training and obtained the private security guard license suggest that training does not improve professionalism of private security. This begs the questions how and why policy makers have failed to achieve two very important goals of the Law – to license private security companies and through trainings improve professionalism, as well as what should be done next in order to remedy this situation.

### *Ministry of Interior slow on adopting and implementing bylaws*

The very first factor that jeopardized achieving the goals envisaged by the Law was the fact that full implementation of the Law depended on adoption of more than a dozen bylaws by the MoI. Among the most important documents were those that regulate setting up training centres, determining the training curriculum and the final exam which are all highly technical documents.<sup>20</sup> However, within the MoI very few staff were

<sup>18</sup> MoI response to BCSP’s questionnaire, August 1, 2016.

<sup>19</sup> Ibid.

<sup>20</sup> They are: Rulebook on Detailed Requirements for Legal Entities and Individuals who Wish to Conduct Vocational Private Security Training, Rulebook on Programmes and Ways of Realizing Trainings for Private Security, Rulebook on the Ways of Conducting Private Security Exams, their Prices and Content and Methods of Keeping Exam Records, Decision on Setting Up the Exam Commission for Private Security.

knowledgeable on the private security industry and working on it,<sup>21</sup> resulting in the MoI being more than one year late in adopting those documents without which training and licensing could not commence. That is why the MoI proposed the new deadline for the completion of licensing process to January 2016,<sup>22</sup> and the National Assembly adopted law amendments but with a new, more realistic deadline of January 2017. As a consequence, the momentum for the implementation of the Law was lost, and private security companies found excuses for not preparing themselves and their employees for this process.

### *Who takes care of the bill?*

Another obstacle for the full implementation of the law was coverage of expenses necessary for licensing private security staff, private security companies and private security guards. These costs are not insignificant: typically over 300 Euro for the whole process per individual case. As expected, private security companies were reluctant to cover these costs since private security guards, not the companies themselves, are the owners of the license and can easily change employers. This opinion dominated in the first several months after the Law was adopted.

However, over time it became clear that private security personnel were unwilling to pay for their licensing, arguing that they were already underpaid (average month salary 230 Euro) and exploited by companies. They also invoked Article 49 of the Labor Law, which stipulates that employers are obliged to provide all trainings that are “necessary for working process and introduction of new work organization.”<sup>23</sup> ... “Training costs are to be covered by employers and from other sources.”<sup>24</sup> The Labor Ministry issued a nonbinding opinion that training should be paid for by employers.<sup>25</sup> After that, private security companies slowly started offering training to their staff. However, the problem now is that while many companies have covered training expenses, they have declined to pay examination fees and costs of issuing licenses as well. At the same time,

**There are more trained than licensed private security guards.**

trained private security guards are reluctant to cover these costs on their own. As a consequence, there are more trained than licensed private security guards.

### *Theory over practice*

Additional time for completing the licensing criteria, which was granted by the parliament, has not been used effectively by policymakers in creating good training programmes. Instead, demanding and overly theoretical curriculum was created. For the physical-technical protection license,<sup>26</sup> the curriculum stipulates 101 hours of training, divided into 16 themes. Training centers usually cover this content in no more than 18 days. According to interviewed trainees, too much content is to be covered in a short period of time, and as a result only theoretical aspects are covered during classes.

21 In April 2015, MoI founded Department for Monitoring and Supervision of PSC and Detectives. See more in the section of this paper: Monitoring compliance and ensuring accountability.

22 Veliki izazovi u primeni Zakona o privatnom obezbeđenju [Great challenges in the implementation of the Law on Private Security ], Report from the roundtable, BCSP, 31.3.2015, <http://www.bezbednost.org/Bezbednost/5766/Veliki-izazovi-u-primeni-Zakona-o-privatnom.shtml>

23 Article 49, para 1, Labor law, Official gazette No. 24/2005, 61/2005, 54/2009, 32/2013 i 75/2014.

24 Article 49, para 3, ibid.

25 Branka Vasiljevic, Na obuci samo dva odsto radnika obezbeđenja [Only 2% of private security guards on trainings], Politika online, 8.2.2016, <http://www.politika.rs/sr/clanak/348748/Na-obuci-samo-dva-odsto-radnika-obezbeđenja> accessed:

26 Four vocational training programmes for private security exist: 1. Training for risk assessment in protecting individuals, property and businesses; 2. Training for physical-technical protection of individuals and property, as well as for maintaining order at sports events, rallies and other places of people’s gatherings; 3. Training for planning and designing of the technical systems of protection; 4. Training for installation, putting into operation and maintenance of the technical systems of protection. (Pravilnik o programima i načinu sprovođenja obuke za vršenje poslova privatnog obezbeđenja [Rulebook on Programmes and Ways of Realizing Trainings for Private Security],”Sl. glasnik RS”, br. 117/2014 [Official Gazette, No. 117/2014 ]). The most of 50000 private security staff have to undergo training for for physical-technical protection.

Trainees question, for instance, why an ordinary private security guard should know what legal conditions legal entities must fulfil in order to be registered as private security company, or know all industry codes for private security. One Professor from the Criminal Police Academy (CPA) estimates that such a demanding training curriculum should last at least three months. This assessment is realistic since CPA programmes have many overlaps with current curriculum for private security.

During classes, top priority is given to learning what competences private security guards have at their disposal. But as with any rote learning, the shortcoming is that there is no decent understanding of the subject. Therefore, most of the trainees do not know how and when to use these competences. “All the energy is focused on what the commission will ask so as to pass the exam easily”. Even in self-defence classes, there is very little practice. “There is only time for presenting a few blocking moves, throws, rolls and break falls, and there is no time for practicing and perfecting them. As a result they are of no use in every day conduct of duty”. The same applies to first aid classes, “it is pure theory, and no single trainee knows how to provide resuscitation (CPR).”<sup>27</sup>

### *High exam passing rate*

In order to help candidates to better prepare for the final exam, the MoI created a list of exam questions<sup>28</sup> which follows the logic of the learning fields. In practice this is of little use for candidates because the list is essentially just repetition of themes and issues from the training programme. The exam itself is separated in two parts, theory and self-defence, which are conducted in different locations on the same day.

On both parts of the exam, the commission tries to get at least some correct answers from candidates in order to prevent exam failure. On the self-defence exam part, one member of the commission said in the beginning: “I’m aware of the fact that you cannot learn much during 35 hours of self-defence classes. Therefore, I’ll ask you 1, 2, 3, 4... questions and only if you do not know anything, you would fail the exam.” One candidate remarked, “But I don’t need to know any self-defence technique, I’m working in the archive”.<sup>29</sup>

The Commission seems to have a different approach to younger candidates, and is noticeably more stringent toward them. “Examination of younger people looked more like a real exam, they had to know more answers”.<sup>30</sup> This is a form of discrimination, since test criteria should be the same for similar licenses. Also, the possible positive effects of this practice, reflected in increased professionalization of private security, are minor since younger people have been a minority among trainees and candidates.

However, it should be noted that some candidates failed the exams due to total lack of knowledge. “One didn’t even know how to make a hand punch.”<sup>31</sup> Another could not name one competency of a private security guard. It is also possible to fail only in one field<sup>32</sup> of the exam which the candidate could re-test during a correctional exam. In this situation they pay less than for a full examination. It seems that the MoI’s statistic confirms this observation, as only 25 candidates out of 1763 completely failed exams (candidates who failed in any tested field and did not show up on correctional exam).

27 A vocational training participant’s statement, 2016

28 Fond ispitnih pitanja po program u stručne obuke za vršenje poslova fizičko-tehničke zaštite lica i imovine i održavanja reda na sportskim priredbama i javnim skupovima i drugim mestima okupljanja građana [List of exam questions under the training programme for physical-technical protection of individuals and property and stewarding of sport and other public events] <http://goo.gl/jSwk8f>

29 However, one interviewee said that he heard from other candidates that in one of the exams a commission member came from Gendarmerie and he was not so lenient towards candidates on self-defence exam. But this stance is unusual.

30 Petrović P. (2016) *Anatomy of the Failed Private Security Licensing*, BCSP, p. 8. [http://www.bezbednost.org/upload/document/anatomy\\_of\\_the\\_failed\\_private\\_security\\_licensing.pdf](http://www.bezbednost.org/upload/document/anatomy_of_the_failed_private_security_licensing.pdf)

31 Observation of interviewee passing the finale exam for private security guard, 2016.

32 Questions are organized around subject fields that are further divided in to themes that contain questions. List of exam questions under the training programme for physical-technical protection of individuals and property and stewarding of sport and other public events <http://goo.gl/jSwk8f>

*Programme needs to suit the needs of private security*

As previously noted, given the number of PSCs and private security guards who have obtained licenses, it seems obvious that private security industry licensing will not be completed before the legally prescribed deadline – January 1, 2017. The policy makers (primarily MoI) have two options. The first option is to strictly follow current regulation and to begin fining companies and their employees working without necessary licenses as of January 2017. By extending the deadline implementation, MoI has given private security companies enough time to at least send their staff to vocational training. However, fining PSCs is an unlikely option since it would severely endanger business which would negatively impact Serbia's already weak economy. A second solution would be to "tacitly" extend the deadline for licensing, meaning that MoI will not be fining PSCs immediately after January 1, 2017 but would rather leave additional time (i.e. 6 months) for PSCs to complete licensing. In this scenario, MoI would slowly start with inspections.

Regardless of how this process will ultimately be completed, it is essential to improve the quality of training. Licenses currently being issued will be valid for five years, after which they must be renewed. The private security industry will be employing new individuals that will be trained and licensed. The following changes in training and licensing must be done. Training curriculum should be changed to take the needs and weaknesses of the private security staff into account. Curriculum must be shortened and made more practical, focusing on real life situations and grey zones in applying PSCs competences. This would also contribute to less infringement of human rights in the future. If the self-defence module continues to be irrelevant, it should be abolished. MoI should allow for the creation of multiple commissions which could work in parallel. Commissions must have the same criteria for younger and older candidates, and should not unfairly assist weak candidates. In order to make these changes happen, it is important to acknowledge and systematically address weaknesses. Otherwise, the situation is unlikely to improve in five years' time.

**Average trainee<sup>1</sup>**

- Above 40 years old
- Secondary education
- Already employed as a private security guard
- Sedentary lifestyle
- Poor physical fitness
- Low interest in self-improvement
- Average month salary €230

<sup>1</sup> Profile of the average trainee is made according to responses of interviewed vocational training participants and private security managers. See more in: Petrović P. (2016) Anatomy of the Failed Private Security Licensing, BCSP

**Licensing costs-specification**

- Health certificate – €35
- Vocational training – €110 – €200
- Firearm handling course – €50
- Exam – €60
- License – €25

Total: ~€320

## Procurement policies

### *Unrealistically low price dominates the market*

It is estimated that nearly 45% of contracts of private security provision are signed with the state (ministries, various agencies, public enterprises, local authorities, all those founded by the state and financed from the budget), and 55% with various private clients. It is also estimated that the vast majority (some respondents claim 80%) of personnel (security guards) are allocated in businesses with the state. The reason for such disparity is a lack of security managers in statutory clients, resulting in a lack of internal oversight that stimulates reliance on physical security. When considering procurement policies, it is important to consider both public procurements by statutory clients and procurements by private clients.

### *Business with statutory clients*

Statutory clients are shaping the price of physical security. The procedure is defined in the 2012 Law on Public Procurements. The previous law in place had major shortcomings regarding procurement of services, including private security services. It was defined that all procurement of services were treated as “low value procurements” (whatever the sum involved), which meant that the clients should obtain three offers and select the best one. This practice led to serious faults as companies often divided the market; pre-set the prices offered, and determined which company would submit the best bid. This was a fertile ground for usage of political connections (and for subsequent clandestine financing of political parties) for winning contracts. As public procurements were not particularly public, the clients would handpick three sample companies. One could observe specific companies flourishing during the reign of their political patrons, and subsequent decline after loss of political backing. In order to reduce this practice, a new law was introduced in 2012 offering two criteria for awarding contracts – lowest price and best value for money. The latter offered 17 different criteria that could be used to evaluate bids. The problem associated with statutory clients is that licensed public procurement officers have little or no knowledge on acquisition of private security services, and there is often no single in-house security manager. They may take advice from skilled persons (security managers, consultant), but are not obligated to do so. Ultimately, the lowest price usually determines which service is hired. Bids are made public, unless there is a rare exception by law. The bid winners are published on the public procurement portal.

This new solution – to make an open procedure obligatory for all procurements – does not prevent improper procurement practices, but makes it more difficult for PSCs to ensure winning of the contracts and profit. Usually, companies resort to lowest price criterion, and PSCs have developed various strategies to win the contract and obtain the profits. The lowest price is calculated by adding up the working hours, and should include wage and taxes. In order to fulfil these demands, without earning profit (usually referred as “positive zero” status), one man-hour should have been 240 RSD in 2014, or 253 RSD as of 2015 (roughly 2EUR). It was not uncommon to see companies offering lower amounts. For example, the Tax Authority had acquired security services for 158 RSD.<sup>33</sup> The Article 92 of the Law on Public Procurement envisages options for discarding the contracts if obtained with “unusually low prices”.<sup>34</sup> The Serbian Chamber of Commerce also created an analysis of “realistic prices” of private security services, starting from a minimal guaranteed wage with all obligatory taxes. However, fierce competition at the Serbian private security market rendered wide acceptance of this document among PSCs impossible. Worse, the Commission for Protecting Bidders’ Rights did not accept the major arguments from this document when determining if unrealistically low prices were accepted by tender commissions, recalling the document is not a legally binding.<sup>35</sup>

There are long term and short term consequences to these behaviours. The long term consequences relate to legal provisions, one such provision being that each procurement price can only increase by 10% per year. This condemns the private security sector in the long run to low profit increase. In the short term, consequences include lower tax revenues, legal risks for employers (PSCs), and security risks for clients, unmotivated guards, and black market activity. In order to keep prices low, several strategies were identified: paying employees 115RSD/h (minimum wage at the time), fining employees for arbitrary offenses(un-ironed

33 Petrovic P., Milosevic M. (eds.) (2015) Novi-stari izazovi privatnog sektora bezbednosti, BCBP, p. 53

34 Zakon o javnim nabavkama, (“Sl. glasnik RS”, br. 124/2012, 14/2015 i 68/2015).

35 Petrovic P., Milosevic M. (eds.) (2015) Novi-stari izazovi privatnog sektora bezbednosti, BCBP, p. 76

shirt, dirty necktie, taxation for training, equipment and uniform...), paying employees less than 115 RSD/h in practice but signing contracts promising that sum, asking return of some amount in cash, hiring retired persons, employing persons on training contracts, hiring persons on a black market and subsequently failing to pay taxes, hiring persons from National employment service – when 60% of taxes are written off; positioning less workforce than agreed – 2 guards monitoring the position of absent third guard; refusing to pay overtime and more.

The mechanisms mentioned above are enabled by “control gaps”. First, there is rarely internal control from a security manager, so technical specifications contained in the tender documentation could increase the number of necessary security guards. By procuring a greater number of security guards than required, PSCs could earn the profit despite low prices – they deliver the contracted (inflated) number of security guards regardless. Furthermore, performance goes unmonitored. External control could be enforced by the Labour Inspectorate, but they are mandated to only process perpetrators caught on the spot. They cannot estimate if a company employed guards from a black market previously, and as a result some companies that have prior been exempt from control begin obeying the Law as their patron parties lose power. BCSP analysis proved that companies with close ties to ruling parties were exempt from Labour inspectorate control in 2014, whereas companies close to the previous regime were thoroughly inspected. The Labour inspectorate proclaimed that during the 2014 inspection, 14,000 workers were without contracts. Respondents in a BCSP survey claimed that around 30% of their workers do not have contracts.

The other criterion – best value for money – is rarely used due to complicated procedure and lack of knowledge. When applied, it was either used to discriminate between competitors (e.g. the terms of references would be asking for 100 guns, 20 patrol cars and grey uniforms, for a job for 10 guards, 3 of them armed), or it was reduced to “lowest price criterion”, as it used criterion of price (awarded 80 points) and other criterion (awarded 20 points), rendering it unimportant. There were accounts that PSCs complained during the procedure to eliminate discriminative practices, but few companies resorted to such “legal battle”. As previously mentioned, this criterion offers at least 17 predefined criteria that could be taken into account. Considering price was one criterion, and reducing by evading labour law and taxation, this criterion offers possibility of control over employees’ rights: number and quality of guards and social criteria (paid taxes, full amount of salary, etc).

EU recently adopted 2014/24/EU Directive recommending “Best value for money” criteria for procuring security services. Member states have a two year deadline to adopt their legislation. Serbia is an EU candidate and this issue will be addressed in the Chapter 5 of the EU acquis regulating procurements.

### *Business with the private sector*

The private sector tends to rely mostly on technical security, supplemented with a small amount of physical security further strengthened by mobile teams. The latter solution enables private clients to engage those teams only when necessary, and allowing them to avoid keeping mobile teams on full payroll during the contract. Private clients are not obliged to use the Law on public procurement, but practice shows that selection between several companies’ offers is a way to reach best value for money. The important difference is the presence of security managers in private companies, as well as that private companies are investing their own private resources on security. They select, monitor and evaluate performance of PSCs contracted. Private clients introduce procedures to establish performance of PSCs’ activities and strive to ensure quality of provided services. The private sector pays higher prices for private security. During the previous law on Public procurement, prices with statutory clients were higher, this has since changed. Previously, the private sector used to pay slightly higher prices for ensured quality. Recently, the trend of low prices dominating the public sector has started to have spill over effects into the private sector. Namely, “bank managers are reluctant to pay security guards 2.20 EUR, whereas the same PSC is doing similar business with the state for 1 EUR”. Another contributing factor is that global crisis forces private companies to cut costs. So far, pricing contracts in the private sector that were away to ensure profitability of PSCs that have contracts with statutory clients have become profitable. The latest trends show a slight decrease of prices in private sector, and thus reliance on semi-legal and illegal methods of profiting from statutory contracts have increased.

## Recommendations

- Amending Law on Public Procurements ensuring compliance with 2014/24/EU Directive on “Best value for money” procurements of services
- Introducing obligatory consultation with security managers/consultants when announcing procurement of security services
- Introducing security managers in public companies

## Monitoring compliance and ensuring accountability

### *Lack of proper control and oversight*

The control of the private security sector is a complex task as it involves both the private and public sphere. There are numerous instances that should affect different aspects of the sector such as compliance with laws, if public money is well used, and elimination of black and grey economy. For those tasks, control bodies should be interconnected and share information. The biggest burden rests on the Ministry of Interior which controls several aspects of private security practice. The MoI adopted the necessary legislation and functions as a gate keeper: they are in charge of conducting exams and issuing licenses for both security companies and private security personnel. The challenge appears to be growing as recent trends indicate possible future cooperation in security between PSCs and MoI (critical infrastructure, airports,).

External control that should enforce accountability of PSCs is conducted by several institutions: the Ministry of Interior, Labor inspectorate, State audit institution, Parliament (Parliamentary Committee for Defence and Internal Affairs), the judiciary and the clients themselves.

The biggest burden rests on the Ministry of Interior which controls several aspects of private security practice.

### *The Ministry of Interior*

As of April 2015, the MoI founded the Department for Monitoring and Supervision of PSC and Detectives. Police directorates in Belgrade, Nis, Novi Sad and Kragujevac have special sections for those tasks, and in other regional departments selected policemen are tasked to monitor and supervise local PSC activities. So far the Ministry of Interior didn't control PSCs in Serbia. It is expected to perform such tasks once the licensing period is completed, when control over the black market and unregistered security guards should start. Currently, all the MoI's efforts are invested in licensing private security.

### *Labour inspectorate*

The Labour inspectorate checks compliance with labour law and suppresses the grey and black market. Their control is ad hoc and biased. There were three waves of control in 2014 and 2015. Such control targeted roughly 350 (out of 600) PSCs operating in Serbia. It was discovered that 14,000 security guards were working without contract.<sup>36</sup> 40,000 security guards operate in Serbia, and 14,000 are not registered or paid properly based on a sample of half of the existing companies. It is likely that 28,000 or more unregistered guards exist in the sector as a whole. Yet, the Labour inspectorate is biased as many respondents claimed that some companies that were said to employ unregistered workers or withhold salaries for months, were not addressed during the systematic inspections. One such company<sup>37</sup> suffering financial difficulty formed a subsidiary company with a

<sup>36</sup> Data acquired from the report of Serbian Association for Safety and Security at Work (Udruženja za bezbednost i zaštitu na radu Srbije) <http://www.ubzrs.org/najnovije/izvestaj-inspektorata-za-rada-za-period-maj-septembar-2014/>

<sup>37</sup> Inex immoguard (IIG) registration number. 17511904, in liquidation; In 2013 they had negative balance of 77 500 000 RSD.

similar name and took over its employees and equipment without paying their previous salaries, and continued to compete on public procurements.<sup>38</sup> One positive note is that Labour Inspectorate cooperates with the Central Register of Mandatory Social Security, thus increasing its capacity to counter the black market.

### *State Audit Institution*

The State Audit Institution (SAI) was founded in 2005 with the aim to control the legality and purposefulness of financial conduct of statutory institutions. So far the SAI has controlled the MoI, the MoD and numerous other public entities, ministries and agencies. However, the SAI has never controlled the acquisition of PSCs services. In several interviews<sup>39</sup> and workshops,<sup>40</sup> their representatives expressed the commitment to pursue acquisition of private security under unusually low prices, but at the present no such control has occurred.

### *Parliament*

Parliamentary control could be performed through the Parliamentary Committee for Defence and Internal Affairs. Yet such control is indirect, and would entail control over the level of monitoring and supervision executed by the MoI. Oversight of the MoI's performance in monitoring and supervising PSCs would be a new development as parliamentarians have not done this previously. The only active role MPs took was during the adaptation of the Law on Private Security, and later amendments. Efficiency of such control is unclear, and MPs are overwhelmed with obligations. Some members of this committee are members of other committees as well. Professional assistance is weak with few resources available. Sessions of the Committee do not last long, so expectations are low. In order to enhance the work of MPs, BCSP issued a guide "10 questions that MPs can ask MoI on supervision of Private Security".<sup>41</sup> The problem is that the majority of MPs in the Committee are from the ruling party, so "they do not want to control their own (companies)" and that even among party members there are informal relations, so that when "one minister is a very good friend with an MP it is very unlikely that he is going to control the minister."<sup>42</sup>

### *Judiciary*

Another weak link in accountability is the judiciary. Several rounds of judiciary reform during 2000 failed to resolve some major issues.. The main problems, according to the Anti-Corruption Council, are political pressures on the judiciary and prosecution, lack of financial and material assets for their proper functioning and unreasonably long court processes.<sup>43</sup> Court processes are stalling, last a long time and the citizens lack

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In the same time, Inex Plus was founded with the same management. Data on those companies can be verified on site of Serbian Business Register Agency: IIG <http://pretraga2.apr.gov.rs/EnterprisePublicSearch/Details/EnterpriseBusinessName/1020365?code=850905E2E8576340C14169C38495866FF3829708> and Inex Plus <http://pretraga2.apr.gov.rs/EnterprisePublicSearch/Details/EnterpriseBusinessData/6487702?code=A534CC89685986723DD13927FB8A69111A776F08> (accessed 8.8.2016.)

38 For more details see: Klopfer F., Van Amstel N. (2015) „A Force for Good: Mapping the Private Security Landscape in Southeast Europe“, DCAF, p. 97 and Petrovic P., Milosevic M. (eds.) (2015) Novi-stari izazovi privatnog sektora bezbednosti, BCBP, p. 45-46

39 Respondent, mid level management of SAI explained: "that makes sense. For instance, when we see four engineers hired for the task of one engineer, than it is a misdemeanour. The same principle stands for inflated number of private security personnel";

40 In the round table organized during PRO CURE project, October 2015, SAI senior representative was presented with the findings of survey on PSCs procurments, and actively engaged in ensuing dialogue, expressing commitment to further deal with issues of unrealistically low prices. <http://www.bezbednost.org/All-projects/5777/PROCURE-Strengthening-Civil-Scrutiny-of-Public.shtml>

41 BCSP: „10 poslaničkih pitanja MUP-u o nadzoru nad privatnim obezbeđenjem“ <http://www.bezbednost.org/Sve-publikacije/5779/10-poslanickih-pitanja-MUPu-o-nadzoru-nad.shtml>

42 Opinion given by one MP: at the time of interviews, deputy head of the Committee Marija Obrdovic was (and still is) a close friend of former and present minister of interior Nebojsa Stefanovic.

43 Governmental Anti-Corruption Council, Report on the state of the judiciary, ref. no. 021-00-3296/2016, 22.3.2016. Available (in Serbian): <http://pescanik.net/wp-content/uploads/2016/03/Izvestaj-o-pravosudju.pdf> (accessed 9.8.2016.)

trust in the judiciary.<sup>44</sup>

In a sample of court cases<sup>45</sup> from 2013-2015 on Labour Inspectorate's pleas against PSCs, many cases were discontinued, a handful were dismissed, but most are still in process, with very few ultimately being terminated.

### *Control by the Clients*

Gaps arise when the law fails to ensure proper solutions to problems. When oversight bodies perform poorly, the market may have a role in the control of PSCs. In dealing with private clients, security managers handle the misbehaviour of contracted PSCs. The control is more detailed, starting from the planning of the security arrangements, through procurement and finally during implementation of the contract. Private clients can easily break contracts with underperforming or problematic PSCs and find another suitable PSC on the market if they are dissatisfied. "The private client asks for quality, and we usually send better guards there. In public institutions security guards are write offs".<sup>46</sup> In a statutory institution there is a lack of such management, and problematic situations (low paid guards, discrepancy in number of contracted vs. provided guards, damages, incidents...) are usually addressed by public procurement officers. Breaking a contract and entering into a new procurement is rarely an option in these situations. Bad contracts are frequently tolerated with eventual sanctions expected after the change of republic/local government.<sup>47</sup>

### *Recommendations*

- Coordinate control of PSCs by exchange of information, such as between the Labour Inspectorate and Central Register of Mandatory Social Security;
- Increase cooperation on other two insurances: Pension and disability insurance fund and National health insurance fund;
- Increased control over training centres (MoI)
- Include reporting on PSC oversight in annual MoI report to Parliament
- Increased transparency of control: Labor inspectorate reports should be also proactively given to Parliamentary Committee, or given on request by MPs. It should contain data which companies were controlled, which companies hired security guards from black market, which PSCs were sanctioned etc.

<sup>44</sup> 82% of citizens think that it is ineffective, 81% that it is corrupt etc... Beta survey on perception of chapters 23 and 24, summary available on: EURACTIV, 2.1.2015. „Građani ne veruju institucijama“ (Citizens don't trust institutions), available <http://www.euractiv.rs/pregovori-sa-eu/8212-graani-srbije-ne-veruju-institucijama->

<sup>45</sup> BCSP acquired data from all 44 misdemeanour courts in Serbia on cases against PSCs in 2013-2015

<sup>46</sup> Statement of a respondent, manager in PSC

<sup>47</sup> For example, the former mayor of Zrenjanin was arrested for malversations, including one with local PSC. More on: B92, 30.10.2009. „Optužena: Tender jeste bio namešten“ Available (in Serbian): [http://www.b92.net/info/vesti/index.php?yyyy=2009&mm=10&dd=30&nav\\_id=389739](http://www.b92.net/info/vesti/index.php?yyyy=2009&mm=10&dd=30&nav_id=389739)

## Concluding remarks

In Serbia, governance of private security has failed. The major goal of the Law on PSCs (2013), licensing of PSCs and their staff, has not been achieved and there is no indication when and if this process will be completed. As of August 2016, only 8 PSCs (out of 300) and 1788 private security staff (out of 50 000) have been licensed, despite a deadline extension and that 91 training centres have been registered so far. Worse, the quality of existing vocational training is very poor. Due to the ineffective curriculum that is overly theoretical and demanding for average security guards, those who have completed training generally do not acquire new, relevant knowledge to improve their professionalism and effectiveness as private security guards. Considering that the deadline for completing licensing was January 2017, decision makers must reconsider what is to be

Two options appear clear - to fine PSCs that employ unlicensed staff or to set a new deadline and redefine the training curriculum.

done to address this issue. Two options appear clear - to fine PSCs that employ unlicensed staff or to set a new deadline and redefine the training curriculum so it is suitable for private security guards. An undesirable but realistic solution would be to license remaining private security staff (nearly 50,000 persons) in a rush and without consideration of quality for the sake of meeting the deadline.

Regardless of licensing problems, other important governance issues remain relevant, though state stakeholders are unlikely to address these issues in the near future. Unrealistically low prices accepted by state institutions on tenders distort the private security market and favours low quality services. It also creates a situation ripe for security guards to have their labour rights infringed upon. It also damages the state budget since unrealistically low prices do not allow for covering all taxes. Politicised control and oversight institutions only further strengthen this practice of low pricing as PSCs close to the current government are not monitored. Without addressing these issues, improvement in private security is unlikely. It is also difficult to expect any healthy and effective public private partnerships in security.

As in the past when the reforms needed to be initiated, today decisive action of CSOs, media and independent regulatory bodies are required to move further from the current stalemate. Free from influence of political parties, these groups are in position to publicise unbiased research findings and demand concrete actions from state institutions. Transparency of state institutions that control and oversee PSCs, and state institutions that outsource private security must be improved significantly. International CSOs ought to be included in advocating international standards and best practices in private security.

## Contributors

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*The Private Security Research Collaboration (PSRC) Project in the Western Balkans was launched in June 2014 and brings together researchers from DCAF and four partner organisations in the Western Balkans and Eastern Europe to develop research outputs on private security company (PSC) regulation in Albania, Bulgaria, Kosovo and Serbia.*

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