

APPENDIXES

Appendix 1. Relevant strategic documents

National Sustainable Development Strategy until 2030 (NSDS): Promotes the protection of cultural heritage and diversity as part of the sustainable development of Montenegro. Also, in the National Strategy for Sustainable Development until 2030, which is the implementation document of the 2030 Agenda for Sustainable Development in Montenegro, the insufficient level of integration into Montenegrin society is indicated as the most important problems in the areas faced by members of the Roma population (primarily problems in the area of the need for adequate regulation of legal status, education, employment, health and housing). It also emphasizes the problems of social exclusion of members of minorities and the need for their greater representation in public and political life. In this regard, the following strategic objectives and accompanying measures from the NSDS are of particular importance for the implementation of Roma policy:

Strategic Objective 1.3: Ensure inclusive and quality education and promote lifelong learning opportunities for all.

Strategic objective 2.1: To stimulate the active relationship of key stakeholders towards the sustainability of development

Measure 2.1.3 – Eliminate national and religious discrimination – the target outcomes by 2030 are as follows:

- Ensuring equal opportunity and reducing inequality of outcomes through the elimination of discriminatory laws, policies and practices and the promotion of appropriate laws, policies and measures.
- Increased number of Roma and Egyptian children completing primary education.
- Reduced level of ethnic distance in Montenegro.
- proper regulation of their legal status.

Judicial Reform Strategy 2024-2027: The overall objective of the Strategy is: Further strengthening of the rule of law through strengthening the independence, accountability, expertise and efficiency of the judiciary, as well as improved access to justice and legal certainty in the process of achieving the protection of citizens' rights and freedoms and raising the level of trust in the judicial system. The Strategy is based

on three specific strategic objectives: Strengthening the independence, impartiality and accountability of the judiciary, Improving the expertise and efficiency of the judiciary, Improving access to justice, transparency and trust in the judiciary.

Strategy for Interculturalism and Social Cohesion 2025-2028: The Strategy is a key document in improving social relations and strengthening social cohesion in Montenegro. The aim of this strategy is to respond to the challenges arising from ethnic, cultural and religious diversity, and to promote an inclusive society that respects and values all its members. This document addresses key problems in society such as ethnic tensions, discrimination, and lack of intercultural dialogue and aims to improve the situation in the field of interpersonal relations, reduce social and economic inequalities between different ethnic groups, and ensure that all citizens of Montenegro have equal opportunities to participate in social, cultural and political life.

Montenegro's Economic Reform Programme (PER) 2024-2026: The Economic Reform Programme (PER) is the most important document in meeting the economic criteria in Montenegro's EU membership negotiations. The main strategic objective of Montenegro's economic policy is: "achieving smart, sustainable and inclusive economic growth that will contribute to improving the quality of life of all its citizens". The measures from the PER will further affect gender equality through greater access to health services for women, especially those of Roma and Egyptian origin, women in rural areas, women with disabilities. Roma and Egyptians are recognized as a vulnerable category in employment, where the PER envisages the need to identify unemployed persons who are at risk in the labor market, define measures and programs of active employment policy, as well as acquire knowledge, skills and experience needed for the labor market. In the field of social inclusion, poverty reduction and equal opportunities, PER puts emphasis on the development of services in the field of social and child protection, which will remove the obstacle to difficult access to services for vulnerable categories of persons.

National Gender Equality Strategy 2021-2025: This is the fourth strategic document that intends to establish a better framework for achieving gender equality in Montenegro. The Action Plan for Achieving Gender Equality clearly points to the particularly unequal position of Roma and Egyptian women in Montenegrin society,

primarily to the fact of marginalized position in the areas of education, health care, housing and employment. The strategic document states that at the primary level of health care of the population, the planned processes of education of women and young people in the field of healthy lifestyles, reproductive health, preparation of women for motherhood are not adequate to the needs and are especially inaccessible to women of the countryside and some marginal groups (Roma and Egyptian women).

Strategy on Social Inclusion of Roma and Egyptians in Montenegro 2021–2025:

Focused on the inclusion of the Roma and Egyptian communities through education, employment and culture. This Strategy is an umbrella document relating to the position of Roma and Egyptians in Montenegro. This document prescribes all the necessary activities to be carried out in order to improve the position of this community in the areas of: employment, housing, health and social protection, exercising the right to personal documentation, education, etc. These goals are also represented within the Strategy for Social Inclusion of Roma and Egyptians 2021-2025, primarily through addressing the specific problems faced by the Roma and Egyptian populations in specific areas and proposing adequate responses to the identified problems. It is particularly important to emphasize the harmonization in the field of strengthening the level of political participation, amendments to the electoral legislation and representation in the Parliament of Montenegro, all with the aim of increasing the level of authentic political representation of the Roma and Egyptian communities.

Strategy for Combating Human Trafficking 2019-2024: The overall objective of the Strategy is to improve the efficiency and functionality of the system of prevention, identification, protection, assistance and monitoring of victims of trafficking in human beings with a special focus on children, as well as the effectiveness of investigations, prosecution and adequate punishment of perpetrators of this crime, in accordance with national criminal legislation and accepted international standards. The Strategy also takes into account important international documents dealing with this area, as well as reports by relevant international partners that carefully monitor and analyse the efforts undertaken by countries in the field of combating trafficking in human beings and provide useful recommendations in order to improve them, of which it is important to mention: the NATO Programme against Trafficking in Persons, the concluding observations of the UN Committee on the Rights of the Child and the UN Committee

on the Elimination of Discrimination against Women (CEDAW), The Committee that monitors the implementation of the International Convention on the Elimination of All Forms of Racial Discrimination (CERD), the Committee that monitors the implementation of the Council of Europe Convention on preventing and combating violence against women and domestic violence – the so-called The Annual Reports of the State Department on Trafficking in Persons, as well as the recommendations of the Second Report of the Council of Europe Group of Experts (GRETA) on the Implementation of the Council of Europe Convention on Action against Trafficking in Human Beings.

Youth Strategy 2023-2027: The Youth Strategy is an important document from the aspect of improving the position of young Roma and Egyptians, primarily through an emphasis on:

- The need for young people to achieve economic and social security through easier access to the labour market and the acquisition of employment;
- Young people have access to quality education;
- Young people are active citizens, engaged, motivated, proactive and participate in decision-making processes, community development, policy making and implementation;
- Young people are in good health, safe, have access to an adequate support system for the transition to adulthood and self-realization, are self-aware, innovative, show initiative and accept diversity;
- Young people have access to quality cultural content as creators and consumers.

Inclusive Education Strategy 2019-2025: Within the field of inclusive education addressed in the relevant strategic document, special importance for the public policy of Roma and Egyptians refers to: Ensuring access and equity of education for all children together with their peers through the necessary cross-sectoral support; Ensuring equity and continuity of inclusive education through successful cooperation within and between sectors and the transition from one level of education to the next, and Improving quality inclusive education through strengthening school policies, culture and practice.

Strategy for Improvement of the Quality of Life of LGBTQ Persons 2024–2028:

The vision of the Strategy is that Montenegro is a country where everyone feels free to be who they are, regardless of their sexual orientation, gender identity and other personal characteristics. The Strategy has two strategic goals, namely: (1) LGBTIQ people feel significantly more accepted in Montenegrin society and their potentials come to the fore; (2) LGBTIQ persons feel more encouraged to seek and exercise their rights in the fields of health and social protection, work and employment.

Minority Policy Strategy 2024–2028: The Minority Policy Strategy is an umbrella sectoral strategic document in the field of minority protection, combating discrimination and strengthening the social inclusion of minority peoples. This strategy defines the policy of the Government of Montenegro in the field of respect and protection of the rights of minority peoples and other minority national communities. The primary focus is on compliance with strategic and operational objectives in the areas of: Education; Employment; Culture and identity of minorities; Political participation of the minority. The Minority Policy Strategy defines that by 2023, the number of educated members of minority peoples and other minority national communities on the importance of political participation will be increased. An important place belongs to the implementation of education for young members of the Roma and Egyptian population to empower them to participate in political life, with a special emphasis on women.

Strategy on Migration and Reintegration of Returnees in Montenegro 2021-2025:

The Strategy on Migration and Reintegration of Returnees in Montenegro for the period 2021-2025 is a key document governing the country's approach to migration management, including irregular migration, asylum, integration of foreigners, and in particular the reintegration of Montenegrin citizens returning from abroad – often after failed asylum applications. The strategy sets goals such as strengthening institutional capacity, improving the legal framework, more effective border control, and providing support to returnees through access to education, healthcare, employment and social services. A special focus is placed on vulnerable groups, including Roma and Egyptians. The document is aligned with European standards and represents a step towards the harmonization of Montenegro's migration policy with those of the European Union, especially in the context of the EU accession process.

Appendix 2. Statistics

Aggregated, processed data from the 2023 Census of Population, Households and Dwellings can be found on the official website of the Directorate of Statistics (MONSTAT):

<https://www.monstat.org/cg/page.php?id=1992&pageid=1992>

Appendix 3. Data from the Second Gender Equality Index in Montenegro

(website of the Bureau of Statistics:

[https://www.monstat.org/uploads/files/Mediji/Indeks%20rodne%20ravnopravnosti%20MNE%20\(2\)_25.7.pdf](https://www.monstat.org/uploads/files/Mediji/Indeks%20rodne%20ravnopravnosti%20MNE%20(2)_25.7.pdf))

The Gender Equality Index in Montenegro for 2023 is 59.3, which is an increase of 4.3 index points compared to the 2019 Index. In the EU-27, the Gender Equality Index is 68.6. Compared to the EU-27, Montenegro recorded a lower index value by 9.3 index points. The index of the main domains of gender equality shows that the largest gap of inequality is in the area of money (lower index value by 20.7 index points compared to the EU-27 average), while the smallest gap in Montenegro compared to the EU-27 average was recorded in the domain of health (lower index value by 0.8 index points compared to the EU-27 average).

Domains and subdomains of the Gender Equality Index, 2023

The RAD **domain** measures the situation regarding equal access to employment and working conditions for women and men and amounts to 70.7. The participation subdomain combines two indicators: participation in full-time equivalent (FTE) employment rates and length of working life. The value of this subdomain is 77.9. Segregation and quality of work are included in the second subdomain. Segregation is measured by the participation of women and men in the education, health and social work sectors and is 64.1.

WORK	
70,7	
Participation	Segregation and quality of work
77,9	64,1

The **MONEY domain** measures gender inequalities in access to financial resources and the economic situation of women and men and amounts to 61.9. The first subdomain of financial resources includes the monthly earnings and income of women and men. The value of this subdomain is 48.2. The second subdomain of economic resources includes the risk of poverty and the distribution of income between women and men and its value is 79.6.

MONEY	
61,9	
Financial resources	Economic Resources
48,2	79,6

The **KNOWLEDGE** domain measures gender inequalities in educational achievement, participation in education and training throughout life. The value of this domain on a scale of 1 to 100 is 53.4. The educational achievement subdomain is measured by two indicators: the percentage of female and male graduates and the participation of women and men in formal and non-formal education and training throughout their lives. The value of this subdomain is 67.1. The second subdomain of segregation has a value of 42.4, and includes gender segregation in tertiary education through the percentage of women and men among students in the fields of education, health, social welfare, humanities and arts.

KNOWLEDGE	
53,4	
Educational achievements	Segregation
67,1	42,4

The **TIME** domain measures gender inequalities in the distribution of time spent on care activities, household chores and social activities. The value of this domain is 58.9. The first subdomain of care, measures gender differences in the extent to which women and men are involved in the care and education of their children or grandchildren, the elderly and infirm, as well as the extent to which they are involved in cooking and other household chores. The value of this subdomain is 61.7. The

second subdomain of social activity explores how many women and men engage in social activities. Specifically, it measures gender gap in sports, cultural or recreational activities outside their home, combined with their engagement in voluntary and charitable activities. Its value is 56.2.

TIME	
58,9	
Him	Social activities
61,7	56,2

The **POWER** domain measures gender equality in decision-making positions in the political, economic and social spheres and has a value of 44.1. The political power subdomain examines the representation of women and men in national parliaments, government, and local assemblies (53,2). The economic power subdomain measures gender balance in economic decision-making through the proportion of women and men on the boards of the largest national listed companies and the national central bank. The value of this subdomain measured on a scale of 1 to 100 is 34.7. In the social power subdomain, data on the participation of women and men in decision-making in research-funding organizations, media and sport are included and amounts to 46.5.

POWER		
44,1		
Political power	Economic power	Social power
53,2	34,7	46,5

The **HEALTH** domain measures gender equality in three health-related aspects: health status, health behaviour and access to health services. The value of this domain is 87.9. The health status subdomain is 87.5 and looks at differences in life expectancy for women and men, along with the age perceived by health and healthy living (also referred to as healthy life expectancy). This is complemented by a set of health behavioral factors, based on the recommendations of the World Health Organization. In this regard, the consumption of fruits and vegetables, physical activity, smoking and alcohol consumption were measured. The value of the health behavior subdomain is

81.1. Access to health care is measured by the percentage of people who report unmet medical and/or dental needs. The value of this subdomain is 95.9.

HEALTH		
87,9		
Health status	Psychological barrier	Access to healthcare
87,5	81,1	95,9

Appendix 4. Training of civil servants

Trainings were held on the following topics:

- "Improving skills for early identification and referral of potential cases of trafficking in human beings in Montenegro",
- "The role of health professionals in the fight against trafficking in human beings",
- "Raising awareness of the phenomenon of trafficking in human beings at the local level",
- "Fight against trafficking in human beings",
- "The Role and Possibilities of Action of the Ministry of Foreign Affairs and Diplomatic and Consular Missions in the Fight against Trafficking in Human Beings" – for representatives of the Ministry of the Interior/Police Directorate, social work centers of the MFSS, the Directorate for Inspection Affairs, health workers, diplomatic and consular staff, as well as representatives of local self-government.

With the support of the International Organization for Migration (IOM), in the period 17-18 May; October 24–25; 09-10 November 2022; Jan. 17-18; Feb. 21-22; On April 12–13, 2023, trainings were organized on the topic: "Identification and referral of victims of trafficking in human beings – implementation of the National Plan for the Formal Identification of Victims of Trafficking in Human Beings", for representatives of the Ministry of the Interior/Police Directorate, Ministry of Labor and Social Welfare/Social Welfare Centers, public institutions for shelter/safe house accommodation, as well as non-governmental organizations.

During the reporting period, trainings and workshops were conducted, among others, on the following topics:

- "The Istanbul Convention and Gender-Based Persecution"
- Capacity Building to Identify and Mitigate the Risk of Gender-Based Violence in Asylum and Migration Processes in Europe
- "Regional Support to Migration Management While Protecting the Rights of Migrants in the Western Balkans and Turkey"
- "Strengthening the skills of early identification and referral of potential cases of trafficking in human beings in Montenegro with a special focus on inter-institutional cooperation"
- "Integration of Persons under International Protection in Montenegro – Development of Integration Plans"
- "Development of Standard Operating Procedures in the Field of Reception of Foreigners Seeking International Protection"
- "Law on International and Temporary Protection of Aliens"
- "Safe Country of Origin"
- "Strengthening capacities in the field of asylum and international protection"
- "Respect, Protection and Promotion of Fundamental Human Rights and Gender Equality"
- "An Integrated Approach to the Reintegration of Returnees in Montenegro"

UNHCR: Four trainings were held for the officers of the Asylum Directorate on the topic of "Countries of Origin" (Turkey, Afghanistan, the Russian Federation and Cuba).

NGO sector: Officials of the Asylum Directorate participated in a two-day training on "Recognizing Indicators of Trafficking in Human Beings in Mixed Migration Flows", which was held in Budva on 18 and 19 October 2021, organized by the NGO "Legal Center" as part of the project "Let's Mobilize Against Trafficking in Human Beings!", which is implemented with the support of GIZ. A two-day training on "Alternatives to Migrant Detention" was also held, organized by CEDEM, in Kolašin, on 25-26 October 2021, which was attended by officials of the Asylum Directorate.

Police Directorate:

Police officers attended trainings on the topics of racial discrimination and related areas (gender equality, gender discrimination, trafficking in human beings, domestic violence, work with vulnerable groups, etc.):

- "Prohibition of Discrimination", "Domestic Violence", "Gender Equality", "Gender Equality in the Police",
- "Resolution 1325 – Women, Peace and Security",
- "Prevention and Protection of Children from Trafficking in Human Beings", "Combating Domestic Violence",
- "Reducing discrimination against the Roma and Egyptian communities",
- "Hate crime", "Fight against hate crime and the rights of LGBT people",
- "Prevention of Sexual Exploitation and Abuse",
- "Mechanisms for the prevention of child begging",
- "Using Guidelines to Conduct Interviews with (Potential) Victims of Human Trafficking",
- "Identification and Referral of Victims of Trafficking in Human Beings – Application of the National Plan for the Formal Identification of Victims of Trafficking in Human Beings",
- "Early/forced/arranged marriages, domestic violence and street begging in the Roma and Egyptian communities",
- "Strengthening the national response to hate crimes, hate speech and discrimination against LGBTIQ people",
- "Available support mechanisms for women and children victims of domestic violence and trafficking in human beings",
- "Training on the prosecution of hate crimes with a special focus on the LGBTIQ community",
- "Prevention and Combating of Violence against Women and Domestic Violence".
- Appendix 5. Statistical data for the period 2019-2023 for criminal offenses under Article 370 and Article 443 of the Criminal Code under the jurisdiction of the Higher State Prosecutor's Office in Podgorica and Bijelo Polje

Racial and Other Kinds of Discrimination under Article 443 of the Criminal Code of Montenegro Higher State Prosecutor's Office in Podgorica							
Year of Formation		2019.	2020.	2021.	2022.	2023.	Total
Number of Cases			2	2	2		6
Number of Persons Involved			2	3	2		7
Proceedings before the Prosecutor's Office	Preliminary Investigation						
	Referred			1			1
	Dismissed		2	2	2		6
	Complaint against the decision on the dismissal of the criminal charges	Founded					
		Unfounded			2		2
	Investigation order						
	Indictment Proposal						
	Post Investigation Indictment						
	Direct Indictment						
Court Decisions	Prison Sentence						
	Probationary Sentence						
	Imposed Security Measure						
	Acquittal						
	Appeal:	Accepted					
		Rejected					
		Rejected by the court					

Incitement to national, racial and religious hatred under Article 370 of the Criminal Code of Montenegro Higher State Prosecutor's Office in Podgorica							
Year of Formation		2019.	2020.	2021.	2022.	2023.	Total
Number of Cases		5	36	13	16	1	71
Number of Persons Involved		6	42	17	44	1	110
Proceedings before the Prosecutor's Office	Preliminary Investigation					1	1
	Referred		7	1	24		32
	Dismissed		6	31	13	19	69
	Complaint against the decision on the dismissal of the criminal charges	Founded					
		Unfounded	4	2	12		18
	Investigation Order		4	3	1		8
	Indictment Proposal						
	Post Investigation Indictment						
	Direct Indictment						
Court Decisions	Prison Sentence			6			6
	Probationary Sentence			1			1
	Imposed Security Measure						
	Acquittal				1		1
	Appeal:	Accepted		1			1
		Rejected		5			5
		Unresolved			1		1

Racial and Other Kinds of Discrimination under Article 443 of the Criminal Code of Montenegro Higher State Prosecutor's Office in Podgorica							
Year of Formation		2019.	2020.	2021.	2022.	2023.	Total
Number of Cases				2			2
Number of Persons Involved				3			3
Proceedings before the Prosecutor's Office	Preliminary Investigation						
	Referred			3			3
	Dismissed			3			3
	Complaint against the decision on the dismissal of the criminal charges	Founded					
		Unfounded					
	Investigation order						
	Indictment Proposal						
	Post Investigation Indictment						
	Direct Indictment						
Court Decisions	Prison Sentence						
	Probationary Sentence						
	Imposed Security Measure						
	Acquittal						
	Appeal:	Accepted					
		Rejected					
		Rejected by the court					

Incitement to national, racial and religious hatred under Article 370 of the Criminal Code of Montenegro Higher State Prosecutor's Office in Bijelo Polje							
Year of Formation		2019.	2020.	2021.	2022.	2023.	Total
Number of Cases			10	6	2		18
Number of Persons Involved			12	26	10		48
Proceedings before the Prosecutor's Office	Preliminary Investigation						
	Referred		2	9	4		15
	Dismissed		6	16	6		28
	Complaint against the decision on the dismissal of the criminal charges	Founded					
		Unfounded		1			1
	Investigation Order						
	Indictment Proposal		4	1			5
	Post Investigation Indictment						
	Direct Indictment						
Court Decisions	Prison Sentence						
	Probationary Sentence						
	Imposed Security Measure			1			1
	Acquittal		4				4
	Appeal:	Accepted					
		Rejected					
		Unresolved					

Racial and Other Kinds of Discrimination under Article 443 of the Criminal Code of Montenegro Higher State Prosecutor's Office (Joint Table Higher State Prosecutor's Office in Podgorica and Bijelo Polje)			
			Total
Number of Cases			8
Number of Persons Involved			10
Proceedings before the Prosecutor's Office	Preliminary Investigation		
	Referred		1
	Dismissed		9
	Complaint against the decision on the dismissal of the criminal charges	Founded	
		Unfounded	2
	Investigation Order		
	Indictment Proposal		
	Post Investigation Indictment		
	Direct Indictment		
Court Decisions	Prison Sentence		
	Probationary Sentence		
	Imposed Security Measure		
	Acquittal		
	Appeal:	Accepted	
		Rejected	
		Rejected by the court	

Incitement to national, racial and religious hatred under Article 370 of the Criminal Code of Montenegro (Joint Table Higher State Prosecutor's Office in Podgorica and Bijelo Polje)			
			Total
Number of Cases			89
Number of Persons Involved			158
Proceedings before the Prosecutor's Office	Preliminary Investigation		1
	Referred		47
	Dismissed		97
	Complaint against the decision on the dismissal of the criminal charges	Founded	
		Unfounded	19
	Investigation Order		
	Indictment Proposal		
	Post Investigation Indictment		13
	Direct Indictment		
Court Decisions	Prison Sentence		6
	Probationary Sentence		1
	Imposed Security Measure		1
	Acquittal		5
	Appeal:	Accepted	1
		Rejected	5
		Rejected by the court	1

Appendix 6. Procedures carried out by the Agency for Electronic Media / Agency for Audiovisual Media Services

In 2018, the Agency for Electronic Media ex officio conducted proceedings against broadcasters and issued a warning for the use of offensive terms that could be associated with a certain social group.

In 2020, the Council of the Agency for Electronic Media ex officio conducted proceedings against two broadcasters from Serbia and temporarily (for three months) limited their rebroadcasting of certain program content due to the promotion of hatred, intolerance and discrimination on the basis of nationality.

In 2021, the Agency for Electronic Media ex officio conducted proceedings against broadcasters and issued a warning for content that emphasized belonging to a certain gender as a form of discrimination against a certain group. The agency received four complaints and on that basis issued one warning for broadcasting content that encouraged discrimination and intolerance on the basis of religion or membership in another group, and three complaints were rejected.

In 2022, the Council of the Agency for Electronic Media ex officio conducted proceedings against two broadcasters from Serbia and temporarily limited their rebroadcasting of certain program content for a period of six months for promoting hatred, intolerance and discrimination on the basis of nationality. Also, the Agency, ex officio, conducted two proceedings against broadcasters from Montenegro and issued two warnings for content that emphasized belonging to a certain group as a form of discrimination against it. The Agency received four complaints related to hate speech and discrimination, and on that basis issued one warning for hate speech, and rejected three complaints. She also received one complaint that was only related to discrimination and the same was rejected.

In 2023, the Agency for Electronic Media received two complaints and on that basis issued one warning for broadcasting content that incited discrimination, belonging to a certain group and one warning when it comes to hate speech.

In 2024, the Agency for Electronic Media, now the Agency for Audiovisual Media Services, ex officio, initiated a procedure when it comes to an offensive term that can be associated with a certain group and issued a warning on that basis. The Agency rejected two complaints related to hate speech and discrimination on the basis of gender, one complaint on the basis of offensive speech, as well as a complaint on the basis of inciting religious hatred and offensive speech. On the basis of a complaint related to discrimination on the basis of belonging to a certain group, a warning was issued.