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# Analysis of legal framework on social and economic rights of vulnerable foreigners in Montenegro



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# I. INTRODUCTION

## (context, profiles and statistics)

1. All human beings—regardless of their migration status—have an equal right to enjoy their human rights. This includes economic, social, and cultural rights – the rights to work, social security, and an adequate standard of living, housing, health, and education. States must not make distinctions in providing services to ensure access to these rights.

One of the already established principles of international law is that states must ensure and guarantee the protection of human rights for all persons under their jurisdiction. This means not only on their territory but also in all areas where they effectively exercise authority.<sup>1</sup> According to the European Convention on Human Rights, individuals who are not nationals of the country on whose territory they are located or are otherwise within the jurisdiction of the high contracting party enjoy the protection of rights.<sup>2</sup>

However, migrants found crossing the border irregularly also have certain human rights, i.e., protection that must be provided by the authorities responsible for border control and preventing irregular migration.

The total area of Montenegro is 13,812 km<sup>2</sup>, with approximately 633,158 inhabitants according to preliminary data from the Statistical Office of Montenegro – Monstat, obtained based on the 2023 Census of Population, Households, and Dwellings.<sup>3</sup>

According to the Ministry of Interior data, 63,659 foreigners have a temporary residence permit in Montenegro, and 29,709 have permanent residence, totaling 93,368 foreigners residing in Montenegro in accordance with the Law on Foreigners.<sup>4</sup>

Data shows that every fifth resident is a foreigner and that the number has been increasing since 2018, especially since 2022, due to a significant influx of Ukrainian and Russian citizens because of the war.

1 <https://www.ombudsman.co.me/img-publications/52/zastitnik%20analiza%20a4.pdf>

2 The European Convention for the Protection of Human Rights encompasses rights and fundamental freedoms, which include: Article 1 - Obligation to respect human rights, Article 2 - Right to life, Article 3 - Prohibition of torture, Article 4 - Prohibition of slavery and forced labor, Article 5 - Right to liberty and security, Article 6 - Right to a fair trial, Article 7 - No punishment without law, Article 8 - Right to respect for private and family life, Article 9 - Freedom of thought, conscience, and religion, Article 10 - Freedom of expression, Article 11 - Freedom of assembly and association, Article 12 - Right to marry, Article 13 - Right to an effective remedy, Article 14 - Prohibition of discrimination, Article 15 - Derogation in time of emergency, Article 16 - Restrictions on political activity of aliens, Article 17 - Prohibition of abuse of rights, Article 18 - Limitation on use of restrictions on rights, as well as Protocol No. 4, Article 4 - Prohibition of collective expulsion of aliens, Protocol No. 7, Article 1 - Procedural safeguards relating to expulsion of aliens..

3 Statistical Office of Montenegro-Monstat-<https://www.monstat.org/cg/page.php?id=1992&pageid=1992>

4 Ministry of Interior Report for 2023.

Data from the Ministry of Interior also shows that the majority of foreign nationals, besides those from regional countries, come from Russia, Turkey, Ukraine, Germany, China, Kazakhstan, Italy, Israel, France, Moldova, the Philippines, Belarus, Azerbaijan, Austria, Australia, the United Kingdom, and Switzerland. For example, in 2018, there were 5,151 Russian nationals, and currently, there are 24,775. The number of immigrants from Turkey has tripled in the same period - in 2018, there were 3,629, and now there are 10,859. During the same period, the number of immigrants from China has decreased more than five and a half times, largely due to the completion of highway construction work, which predominantly employed Chinese nationals.

A large number of so-called economic migrants are typically from neighboring countries as well as from distant countries like Russia, Ukraine, and Turkey. The reasons for migration of this profile are better economic opportunities and work in areas such as construction, hospitality, tourism, and agriculture in Montenegro. Most of these individuals have work permits and regulated residence.

## II. LEGAL FRAMEWORK

2. The Constitution of Montenegro<sup>5</sup> in Article 9 prescribes: that ratified and published international treaties and generally accepted rules of international law are an integral part of the internal legal order, and that they have primacy over domestic legislation and are directly applicable when they regulate matters differently from domestic legislation.

Montenegro has adopted two key laws: the Law on International and Temporary Protection of Foreigners<sup>6</sup> and the Law on Foreigners<sup>7</sup>, through which European standards are largely implemented, reflecting on the quality and efficiency of foreigners' rights, the management of legal migration flows, and the suppression of irregular migration through coordinated and clearly prescribed procedures.

2.1 At the level of the European Union (EU), the protection of fundamental rights is an issue that affects multiple segments and areas. The bodies within this association of states must take these rights into account in their work, regardless of their place within the institutional structure or the topics they deal with. EU member states have agreed on a common European asylum policy, which includes subsidiary and temporary protection. This is very important to consider in the context of the fact that national legislation and practice in the field of asylum formally aim to fully harmonize/alignment with EU law, thereby fulfilling the obligations undertaken by the Stabilization and Association Agreement.<sup>8</sup>

<sup>5</sup> Constitution of Montenegro ("Official Gazette of Montenegro", no. 01/07 and 38/13)

<sup>6</sup> Law on International and Temporary Protection ("Official Gazette of Montenegro", No. 2/17, 3/19)

<sup>7</sup> Law on Foreigners ("Official Gazette of Montenegro", No. 12/18, 3/19)

<sup>8</sup> <https://www.ombudsman.co.me/img-publications/52/zastitnik%20analiza%20a4.pdf>

The laws largely contain the standards of the Asylum Procedures Directive, which establishes common standards for fair and effective asylum procedures, especially provisions that guarantee access to the asylum procedure, the right of the applicant to remain in the territory of Montenegro until a final decision on their application is made, the right to appeal a negative decision, and more.

Namely, through further harmonization of the Law with EU directives, and especially through simplifying procedures for issuing/extending temporary residence and work permits, integrating all authorities involved in this process, and improving coordination of competent services, there will be an indirect/direct impact on reducing rights violations, increasing respect for migrant rights, and reducing inequalities (detailed further in the text).

As will be detailed further in the text, the lack of a formally prescribed procedure, methodology, and mechanisms for determining the identity and age of migrants makes it difficult to access the procedure and exercise the rights of minor foreign persons, as well as other irregular migrants who are potential asylum seekers.

In the process of harmonizing further legislative changes, it is necessary to prescribe additional guarantees within the provisions regulating the procedure at the border and transit area (especially in terms of ensuring adequate accommodation conditions, determining the duration of the procedure at the border in accordance with the Directive's objective, and more closely regulating the rights and obligations of the applicant during the appeal procedure).

The Law on International and Temporary Protection of Foreigners<sup>9</sup> in Article 2 prescribes that international protection of foreigners includes asylum<sup>10</sup> and subsidiary protection.<sup>11</sup> The procedure for granting international protection – expressing the intention to submit a request for international protection is regulated by Article 34 of the same law. The expression of intent to seek international protection is possible in all municipalities, authorities, institutions, and border crossings, at all places where these persons come into contact with state authorities. However, only about 2.1% of foreigners who expressed the intention to seek international protection eventually submit a request, while the rest continue their migratory movements.

At border crossings, the intention for international protection is only recorded by border police officers, but further procedures and actions are not provided at the border crossings.<sup>12</sup>

<sup>9</sup> Law on International and Temporary Protection ("Official Gazette of Montenegro", no. 2/17, 3/19)

<sup>10</sup> Article 3: Asylum is granted to a foreigner seeking international protection, who is outside their country of origin and has a well-founded fear of persecution based on race, religion, nationality, membership in a particular social group, or political opinion, and therefore cannot or does not want to seek the protection of that country.

<sup>11</sup> Article 4: Subsidiary protection is granted to a foreigner seeking international protection, who does not meet the conditions for asylum, if there are justified reasons indicating that upon return to the country of origin, they will face a real risk of suffering serious harm and is unable or, due to such risk, unwilling to seek the protection of that country.

<sup>12</sup> According to the conclusions from the "Analysis of the State Authorities' Procedures Regarding International Protection Seekers": <https://www.ombudsman.co.me/img-publications/52/zastitnik%20analiza%20a4.pdf>.

Article 5 of the Law on Social and Child Protection<sup>13</sup> stipulates that rights from social and child protection established by this law and international treaty can be exercised by a foreigner with approved temporary or permanent residence in the country. Rights from social and child protection established by this law and international treaty can also be exercised by an asylum seeker and a foreigner under subsidiary protection, in accordance with the law. Exceptionally, a person who is not covered within the meaning of this article and who, due to special circumstances and social risk, requires an appropriate form of protection, has the right to one-time financial assistance and the right to temporary accommodation services.

Categories of foreigners not covered by this law, and thus not entitled to social and child protection, are at risk of poverty and engaging in some illegal activities. In this regard, it is necessary to consider and expand the number of foreigners in need of social and child protection. In practice, one-time financial assistance amounts are very low, and the process of obtaining assistance sometimes takes weeks.

The Law on Misdemeanors of Montenegro<sup>14</sup> should not apply punitive measures in cases where asylum seekers, as a particularly vulnerable category of migrants, cross the border illegally. Article 13 of the Law on International and Temporary Protection prescribes non-punishment for illegal entry or stay in Montenegro for a third-country national or stateless person who has entered Montenegro illegally from an area where they fear persecution. They will not be punished for illegal entry or stay if they express the intention to apply for international protection without delay and justify the reasons for illegal entry or stay in Montenegro.

In this part, there are no clear criteria specified for foreigners to use to justify reasons for illegal entry or stay, creating insecurity and uncertainty among foreigners.

Other foreigners who illegally cross the state border can be punished, and even deprived of liberty. The Law on Border Control<sup>15</sup> qualifies crossing or attempting to cross the state border outside a border crossing point, outside working hours at a border crossing point, or contrary to the purpose of the border crossing point, as well as crossing or attempting to cross without a valid travel or other document, as a misdemeanor (Article 67). Illegal entry is also regulated as a misdemeanor under Articles 212, 213, 214, 215 of the Law on Foreigners.<sup>16</sup> However, unlike the Law on Border Control, which prescribes both a fine and deprivation of liberty for violations of illegal entry rules, the Law on Foreigners exclusively provides for the imposition of a fine.

<sup>13</sup> file:///C:/Users/Win/Downloads/zakon-o-socijalnoj-i-djecjoj-zastiti%20(1).pdf

<sup>14</sup> Law on Misdemeanors ("Official Gazette of Montenegro", No. 001/11 of 11.01.2011, 006/11 of 25.01.2011, 039/11 of 04.08.2011, 032/14 of 30.07.2014, 043/17 of 04.07.2017, 051/17 of 03.08.2017)

<sup>15</sup> Law on Border Control ("Official Gazette of Montenegro", No. 72/2009, 20/2011 - other law, 40/2011 - other law, 39/2013, and 17/2019)

<sup>16</sup> Law on Foreigners ("Official Gazette of Montenegro", No. 12/2018, 3/2019, and 86/2022)

Misdemeanor courts and presiding judges should recognize migrants who express the intention for international protection and inform them about the possibilities of obtaining international protection without punishment.

The Law on Free Legal Aid Article<sup>17</sup> 12 stipulates that the right to free legal aid under the conditions established by this law can be exercised by: (2) a stateless person (apatrid) who lawfully resides in Montenegro and a person seeking asylum in Montenegro; (3) a foreigner with permanent residence or approved temporary residence, and other persons who lawfully reside in Montenegro; and (4) other persons in accordance with ratified and published international treaties. Although stateless persons and seekers of international legal protection have the right to free legal aid provided by free legal aid services at the courts, this right, according to available information, has not been realized in practice and is not being utilized.

The application of this institute is questionable regarding the right of asylum seekers to participate in the process and follow its course in a language they have indicated they understand. There are also serious challenges related to securing a sufficient number of interpreters, especially when it comes to rare language groups (Pashto, Urdu, and Farsi). The Asylum Directorate currently has one permanent interpreter who works for the Directorate (proficient in French, English, Arabic, and Berber), financed by UNHCR, which is very useful given that the majority (80%) of asylum applications are from Maghreb countries.<sup>18</sup>

Although stateless persons and seekers of international protection have the right to free legal aid provided by free legal aid services at basic courts, according to court data, this right has been utilized by only one person (a stateless person) since the application of the Law on Free Legal Aid<sup>19</sup> began on January 1, 2012. Among asylum seekers, there have been no users of this institute.

Considering that communication with parties (asylum seekers) is significantly hampered due to language barriers, it is necessary to find permanent and structural solutions to the problem of the lack of interpreters, in accordance with Directive 2005/85/EC on asylum procedures and Directive 2003/9/EC regarding the submission of applications and the process in a language known to the applicant, free legal aid, assistance with filing appeals, and the right to appeal. In this context, there is also a need for continuous training of police officers responsible for handling individuals within the asylum system, with the aim of raising awareness of international humanitarian law standards.

<sup>17</sup> Law on Free Legal Aid ("Official Gazette of Montenegro", No. 020/11 of 15.04.2011, 020/15 of 24.04.2015)

<sup>18</sup> The term for North African countries (between the Libyan desert, the Mediterranean Sea, the Atlantic Ocean, and the Sahara) that formed the western part of the Arab empire (from the 7th century), i.e., Algeria, Morocco, and Tunisia, as well as Libya.

<sup>19</sup> Law on Free Legal Aid ("Official Gazette of Montenegro", No. 020/11 of 15.04.2011, 020/15 of 24.04.2015)

## III. STRATEGIC DOCUMENTS

3. In Montenegro, the strategic documents dealing with migrations include:

The Strategy on Integrated Migration Management 2021-2025<sup>20</sup> with the Action Plan for the Implementation of the Strategy on Integrated Migration Management; The Readmission Strategy 2015-2020;<sup>21</sup> The National Strategy for Gender Equality 2021-2025 with the Action Plan 2023-2024 (hereinafter: NSGE 2021-2025 and AP 2023-2024); The National Employment Strategy for the period 2021-2025; The National Strategy for Combating Human Trafficking 2019-2024;<sup>22</sup> The Asylum Development Strategy 2017-2021; The National Strategy for Sustainable Development until 2030 (NSSD), which represents Montenegro's long-term development strategy;<sup>23</sup> The National Security Strategy of Montenegro; The Strategy for Durable Solutions to Issues Concerning Displaced and Internally Displaced Persons in Montenegro; Sectoral strategic documents: Schengen Action Plan, Strategy for the Social Inclusion of Roma and Egyptians in Montenegro 2021-2025 - this document is based on improving the social inclusion and living conditions of Roma and Egyptians, including migrants from these communities; The Strategy for the Development of the Social and Child Protection System 2018-2022, which includes measures to improve the social protection system that includes the specific needs of migrants and refugees, especially vulnerable groups such as children, women, and the elderly; The Strategy for the Integration of Asylum Seekers and Persons Granted International Protection in Montenegro 2017-2021, which focuses on the social integration of asylum seekers and refugees through access to education, employment, healthcare, and social services; The Strategy on Migration and the Reintegration of Returnees in Montenegro for the period 2021-2025.

Strategic documents and their measures mostly aim to combat social, health, and other exclusions targeting groups at risk of marginalization, considering the status of individuals (those who express the intention for international protection, migrants, asylum seekers, refugees, persons at risk of statelessness). Fulfilling the conditions for membership in the European Union also involves meeting standards in the field of migration.

In the public domain, the argument has been made several times that new strategies are being adopted without evaluating the results of previously valid strategies, that precise and updated data for careful strategic planning are lacking, and that, due to the involvement of a large number of actors, there is a price to be paid in terms of efficiency in fulfilling strategic goals. Finally, the lack of funds is often cited as the reason for not achieving strategic measures and activities, indicating unsustainable budgeting in their planning and adoption.

<sup>20</sup> <https://www.zzzcg.me/wp-content/uploads/2022/02/strategija-o-migracijama-i-reintegraciji-povratnika-u-crnoj-gori-2021-2025g-s-akcionim-planom-za-2021-i-2022-g-1.pdf>

<sup>21</sup> <https://www.zzzcg.me/wp-content/uploads/2022/02/strategija-o-migracijama-i-reintegraciji-povratnika-u-crnoj-gori-2021-2025g-s-akcionim-planom-za-2021-i-2022-g-1.pdf>

<sup>22</sup> <https://www.gov.me/dokumenta/ffadb5a-c40e-4ab2-ad5d-3606cfca4a97>

<sup>23</sup> <https://www.scribd.com/document/429771520/Nacionalna-strategija-odrzivog-razvoja-do-2030>

## IV. STATE AUTHORITIES AND BODIES DEALING WITH MIGRATION ISSUES

4. In addition to the Ministry of Interior and the Police Directorate, as key bodies dealing with migration issues in Montenegro, significant roles are played by: Ministry of Foreign Affairs, Ministry of Finance, Ministry of Labor and Social Welfare, Ministry of Economic Development, Ministry of Education, Ministry of Health, Centers for Social Work, Red Cross, Revenue Administration, Customs Administration, Employment Agency, Protector of Human Rights and Freedoms, NGOs and local self-governments, which perform tasks related to meeting the needs of immediate and common interest for citizens – local population.

Significant international organizations in the field of migration in Montenegro are: United Nations (UN), International Organization for Migration (IOM), United Nations High Commissioner for Refugees (UNHCR), FRONTEX.

The status agreement between Montenegro and the EU on the activities carried out by Frontex in Montenegro is harmonized with the new EU regulation and foresees the possibility for Frontex to engage its officers with executive powers in any part of the territory of Montenegro, not only at the border with the EU, as which it was until now. The border police sector also initiated the implementation of the new Agreement on police border cooperation between the MUP of Montenegro and Frontex, through an expanded joint operation - Joint Operation Montenegro Land.

## V. ACCESS TO SOCIO-ECONOMIC RIGHTS

5. After expressing their intention, migrants have rights determined by law. In legal traffic, there is a certificate issued by the border police to foreigners who have expressed their intention to submit an application for international protection, although the law does not prescribe the form, content and obligation to issue such a certificate anywhere.<sup>24</sup>

The Ministry of Internal Affairs is obliged to issue a document on the prescribed form to the foreigner within three days, which proves that he has submitted an application for international protection, and which will serve as his residence permit in Montenegro until the decision on the application for international protection becomes final.<sup>25</sup> Instead of them, according to long-standing practice, certificates of the submitted request for international protection-paper are issued.

From January 1 to December 31, 2023, a total of 4,998 intentions to submit applications for international protection were registered in Montenegro. Of this number, 4,283 were adult males; 343 adult females; 165 minor males; 121 minor females; and nine (9) unaccompanied

<sup>24</sup> Art. 34 st. 8 of the Law on International and Temporary Protection;

<sup>25</sup> Art. 71 of the Law on International and Temporary Protection;

minor males. There is a noticeable increase in the number of unaccompanied minors applying for international protection.

According to preliminary data from the Asylum Directorate, out of this number, from January 1, 2023, to December 31, 2023, there were a total of 126 applications for international protection. Thirteen (13) applications for international protection were approved including nine (9) asylums and four (4) subsidiary protections. In 57 cases, the procedure was suspended; 82 applications were rejected; and 92 cases are ongoing. These data clearly indicate a discrepancy between the number of expressed intentions on the one hand and formally submitted applications for international protection on the other, confirming the earlier conclusion that Montenegro remains a transit country.

The rights of a foreigner seeking international protection are prescribed by Article 58 of the Law on International and Temporary Protection.<sup>26</sup> This means that reception includes accommodation in the Reception Center, food, clothing, reimbursement of public transport costs if transportation is needed to participate in the process of granting international protection or exercising other rights, and financial assistance to the foreigner seeking international protection.

Although the reimbursement of public transport costs is prescribed as a legal right, in practice, it is not fully implemented. Additionally, the statement “if transportation is needed for...” is inappropriate, considering the freedom of movement and the exercise of their rights. However, the legal solution has several shortcomings compared to current practice. This represents an excessive financial burden for individuals, especially the most vulnerable, and the community should bear the costs (more on transportation costs in the section on challenges of foreigner integration).

Regarding accommodation, Montenegro has two reception centers - the Reception Directorate in Božaj and the Reception Directorate in Spuž, with a total capacity of 164 beds, of which 60 beds are in the temporary container settlement in Božaj.

Asylum seekers have the right to work after a period of nine months from the date of submitting the application for international protection if the Ministry has not made a decision. These individuals have the right to work without permits obtained from the administrative authority; however, employers in Montenegro are mostly not aware of this regulation and request proof—a work permit—from asylum seekers. The language barrier is also a problem when employing this category of people. This raises the question of what types of jobs they can take, and it shows that employers tend to give them jobs that “nobody wants to do in the country,” i.e., the most physically demanding jobs.

Therefore, according to the applicable Rulebook on the Employment Booklet, foreigners seeking international protection cannot obtain an employment booklet from the competent municipal

<sup>26</sup> A foreigner seeking international protection has the right to: 1) stay in Montenegro; 2) freedom of movement in Montenegro; 3) acceptance; 4) health care; 5) primary and secondary education; 6) information necessary for residence and legal advice regarding the procedure for requesting international protection and free legal aid; 7) free legal aid; 8) work; 9) documents in accordance with this law; 10) family unity.

labor secretariats because these individuals do not have any proof of identity (identity card or passport), do not have a personal identification number, and the system does not allow the processing of the employment booklet without the entered personal identification number. The procedure for issuing employment booklets is conducted in accordance with the Rulebook on the Employment Booklet. This Rulebook has been in effect since January 1983 and dates back to the time of the SFRY, so it no longer corresponds to the labor-law nor the social reality. For foreigners seeking international protection, according to the applicable regulations, assigning a personal identification number is not foreseen. Also, in the records of unemployed persons of the Employment Agency in 2022 and 2023, there is usually one or no person who is a foreigner seeking international protection.

The right to work as one of the rights for foreigners seeking international protection is still not fully accessible, despite all efforts to find adequate solutions. This right is not recognized as an exception in the Law on Foreigners, which is the fundamental regulation in the field of work and employment of foreigners, in the same way as it is for persons with international protection and foreigners under subsidiary protection.

At the same time, the Law on Foreigners<sup>27</sup> prescribes that a foreigner in Montenegro can work based on a temporary residence and work permit or a work registration certificate and only with the employer who employs them. The employer can assign the foreigner only to the jobs for which the residence and work permit or the work registration certificate has been issued. The employer must have a copy of the residence and work permit or the work registration certificate of the foreigner working for them in their business premises or place of work. The employer must not employ or use the labor of a foreigner who is illegally residing in Montenegro.

A temporary residence and work permit, according to its purpose, can be issued for: 1) employment of a foreigner; 2) seasonal employment of a foreigner; 3) work of a posted worker. A temporary residence and work permit for the employment of a foreigner is issued for a validity period of up to one year and can be extended for up to two years. The employer is obliged to conclude an employment contract with the foreigner and register them for mandatory social insurance within eight days from the date of issuing the temporary residence and work permit for employment, in accordance with labor regulations.

The annual number of temporary residence and work permits for foreigners is determined by the Government, in accordance with migration policy, the state, and trends in the labor market in Montenegro, no later than November 30 of the current year for the following year. The annual quota determines the activities and occupations in which foreigners can be employed or provide contracted services. The annual quota is determined by the Government on the proposal of the state administration body responsible for labor affairs, after obtaining the opinions of the Employment Agency, state administration bodies responsible for certain

<sup>27</sup> Law on Foreigners ("Official Gazette of Montenegro", no. 12/2018, 3/2019 and 86/2022).

activities for which the annual quota is determined, and the Social Council. The Government can limit the annual quota, increase the number, or reallocate according to purposes if conditioned by changes in the supply and demand relationship in the labor market or due to special conditions in certain activities.

The quota for employing foreigners in 2023 is 21,454 permits. Of this number, 5,500 work permits are allocated for additional redistribution by the Ministry of Labor and Social Welfare, in accordance with labor market needs. In the utilized quotas for employing foreigners, four occupational groups predominantly participate (81.38%): construction, accommodation and food services, other service activities, and trade. However, language barriers, cultural differences, and customs represent obstacles to employment and a potential risk of poverty, which should be overcome with policies of financial and non-financial support from the state.

In Montenegro in 2022, there were 18,400 foreign-owned enterprises, which is 25.4 percent more compared to 2021, and it is likely that there was a similar increase, if not more, in 2023. According to Monstat data<sup>28</sup>, the largest number of active business entities in foreign ownership, according to the country of origin of the owner, were from Turkey, with 5,000 or 27.2 percent, followed by Russia with 4,380 or 23.8 percent, Serbia with 2,140 or 11.6 percent, and Ukraine with 874 or 4.7 percent.

According to the latest data, there are currently 26,000 companies established by foreigners. Most of those with foreign ownership structures, almost more than a quarter, are registered in Podgorica and Budva. These figures show that Montenegro is an attractive area due to certain legal facilitation and procedures for obtaining temporary residence, permanent residence, establishing foreign companies, regulating certain status rights, and a favorable labor and capital market for foreign nationals.

The largest number of companies were established by citizens of Turkey, Russia, Serbia, Ukraine, and Germany. Various companies are being opened, dealing in wholesale and retail trade, professional, scientific, and technical activities, information and communication, IT, construction, administrative and support service activities, accommodation and food services, motor vehicle repair, and others.

According to the data, the most numerous companies are engaged in unspecialized wholesale trade, with about 3,500 of them, followed by consulting activities related to business and other management - around 3,400. There are about three thousand companies operating in the construction sector, and about 1,600 restaurants and mobile catering establishments. Over 1,500 companies are engaged in computer programming. The increase in the number of new enterprises founded by foreign nationals has also led to a large number of employees who are not citizens of Montenegro.

<sup>28</sup> Statistical Office of Montenegro - Monstat - <https://www.monstat.org/cg/page.php?id=1992&pageid=1992>

## VI. Students-foreign citizens

6. The number of foreign students in Montenegro has been increasing in recent years. According to preliminary data, 700 foreign students enrolled at the University of Montenegro (UCG) in the 2022/2023 academic year, while in 2023/2024, the number reached around 800. Most students come from regional countries, but there are also students from a broader international context.

Favorable study conditions, including lower tuition fees compared to other European countries and exchange programs like Erasmus+<sup>29</sup>, create a positive environment for the smooth academic experience of foreign students.

The Law on Higher Education<sup>30</sup> and the Regulations on the Conditions, Criteria, and Enrollment Procedures for Undergraduate Studies at the University of Montenegro<sup>31</sup> stipulate that foreign nationals have the right to enroll in study programs in Montenegro under the same conditions as Montenegrin citizens, in accordance with the law and the institution's statute. However, foreign nationals must have temporary or permanent residence in Montenegro. For study purposes, foreign students must possess an appropriate visa or residence permit. Visa or residence permit applications are usually completed at diplomatic missions or the nearest embassy. Complete lists of required documents can be found on the websites of the respective embassies.

Due to increasing mobility, one of the critical challenges in the application process is the requirement for proof of a clean criminal record in the countries where they previously resided. These requirements are often selectively activated (i.e., not always mandatory), but when they are, they can lead to very complicated situations. A residence permit is necessary to access a local bank account, which in turn is required for processing local scholarships.

Additionally, the costs of collecting and authenticating criminal record documents, along with their translations into the local language, can be significant. Foreign nationals can enroll under the same conditions as Montenegrin citizens, but their diplomas must be recognized. If the diploma recognition process is not completed, foreign nationals can be conditionally enrolled, assuming the process of diploma recognition has already been initiated. Foreign students hold the status of self-financing students. Self-financing students who pass all exams may become budget-financed students if there are available places in their study programs. These students are selected based on their earned ECTS credits and academic performance during their studies.

However, the practical situation differs from the legislative framework. Namely, foreign students in Montenegro do not have the same rights as Montenegrin students, such as the right to accommodation in dormitories or access to meals in cafeterias. Foreign students

<sup>29</sup> <https://www.ucg.ac.me/objava/blog/19379/objava/44512-mobilnost-studenata-erasmus-konkursi-objavljeni-u-zimskom-semestru-2023-24;>

<sup>30</sup> Law on Higher Education of the Republic of Montenegro;

<sup>31</sup> Rulebook on the conditions, criteria and procedure for enrollment in undergraduate studies at the University of Montenegro.

can only obtain accommodation and meals at economic (market) prices, not at regular rates. The most significant expense and concern for both students and their parents is how to find decent, safe accommodation, well-connected by public transport, close to the university, and reasonably priced. Students typically choose between staying in student dormitories or renting a room/apartment. The cost of renting a room/apartment depends on many factors: distance from the university, size and condition of the apartment, number of roommates, local real estate standards, and prices in the city/country.

One of the main documents required for obtaining a residence permit is proof of health insurance. State scholarships and many scholarships from private foundations include insurance costs as part of the scholarship. The biggest issue foreign students face is accessing healthcare, as they cannot receive treatment in accordance with the health insurance they have in their home country (which typically covers all medical services). For example, extended hospital stays, ongoing therapies, and similar situations are not covered by their insurance in Montenegro. In these cases, students must return to their home country to receive adequate and complete healthcare.

It should also be noted that there is a lack of response from student representatives, considering that foreign students are defined as students of the University of Montenegro, and they often join their Montenegrin colleagues in advocating for rights and demands.

Language learning is a challenge for foreign students, as the only certified school is the "Slobodan Škerović" Gymnasium in Podgorica, which runs a Montenegrin language education program for asylum seekers and individuals with subsidiary protection. This program was developed in accordance with the Common European Framework of Reference for Languages and learning standards. Foreign students who attend study programs in other cities in Montenegro are, in most cases, unable to regularly attend language classes.

Public transportation is commonly used by students, often offering the option to purchase a monthly pass with a student discount, but this is usually valid only within the respective city. For transferring money between their home country and Montenegro, students use direct bank transfers, as well as services like Western Union, Ria, and Transferwise. Additionally, students often use revolving credit cards linked to their parents' bank accounts, allowing them to receive financial support from their parents without transaction fees. This method is highly functional for students, reducing the need for cash, as most payments are made electronically.

The most common source of income for students abroad is scholarships, but in most cases, parents play a primary role in financing their studies. Another option is taking out a student loan from a bank, where one of the parents can act as a guarantor. In most cases, a student residence permit allows a limited number of working hours per week (10 hours per week). Some employment opportunities for students include working at the university, hotels, restaurants, and cafes, where knowledge of multiple foreign languages can be a significant advantage. Salaries depend on the agreement and the willingness of the employer.

## VII. PERSONS WITH GRANTED TEMPORARY PROTECTION - REFUGEES FROM UKRAINE - MASS INFLUX

7. From the beginning of the conflict, i.e., from February 24, 2022, to the end of the year, 88,392 Ukrainians entered Montenegro, and 81,294 left. During 2023, 98,871 Ukrainians entered Montenegro, and 97,860 left.

Montenegro, applying the Council Directive 2001/55/EC of July 20, 2001, on minimum standards for granting temporary protection in the event of a mass influx of displaced persons, and with the support of international organizations (UNHCR), is working on providing assistance and support to Ukrainian refugees. The Government of Montenegro, at the proposal of the Ministry of Interior, on March 10, 2022, adopted the Decision on Granting Temporary Protection to Persons from Ukraine<sup>32</sup>. This Decision on granting temporary protection to people was amended in 2023, in light of the fact that the Council of the European Union officially adopted the Decision on extending temporary protection (EU) 2023/2409 on October 19, 2023, introduced by the earlier Decision (EU) 2022/382, until March 4, 2025.

Montenegro, as a partner of the Western Balkans, received the largest number of Ukrainian citizens by the end of March 2023, of which 7,857 received temporary protection, with 70% being women. Additionally, 4,264 people extended their status, and 1,052 new applications were submitted after the deadline, bringing the number of people under temporary protection to 5,316 by June 2023 (including 3,226 women).

The Coordination Body<sup>33</sup> prepared a draft Response Plan for the reception of people from Ukraine with EU support. However, Montenegro has mainly relied on ad hoc and emergency solutions, which were not embedded in the state social system. An emergency plan was lacking. Some sectoral laws still need to be harmonized with the Law on Foreigners to ensure that persons under temporary and international protection can fully exercise their social rights (see the text on harmonizing laws).

Montenegro has provided access to healthcare services and accommodation for displaced persons, exceeding EU minimum standards. Free accommodation in hotels, including meals and other services, was provided for 104 displaced persons from Ukraine; 27 people were housed and are still in the Reception Directorate in Spuž. About 2,500 medical services were provided. However, adequate psychosocial support was lacking, as many of them suffered trauma from being forced to leave their homeland and from the war.

<sup>32</sup> file:///C:/Users/Win/Downloads/informacija-u-vezi-statusa-lica-iz-ukrajine-pod-privremenom-zastitom-u-crnoj-gori-sa-predlogom-odluke-o-izmjeni-i-dopuni]

<sup>33</sup> Decision of the Government on March 31, 2022, established the Coordination Body between the Ministries of Interior, Labor, Health, Education, Finance, and Foreign Affairs, the Consulate of Ukraine, the International Organization for Migration, the United Nations High Commissioner for Refugees, and the Red Cross to coordinate support and integration measures for displaced persons from Ukraine

Access to education is legally guaranteed, but the number of Ukrainian children enrolled in Montenegrin schools remains low (151 children out of 1,114 school-aged children), although it should be noted that some children attend online classes in Ukrainian. Foreign children in the education system often do not know the local language, and teachers frequently have communication problems with these students, who also face the same barriers.

According to data from the Ministry of Education for the 2022/2023 school year,<sup>34</sup> students of foreign nationals come from the following countries: Albania 139, Argentina 4, Australia 3, Austria 2, Azerbaijan 3, Belgium 1, Belarus 97, Bosnia and Herzegovina 313, Bulgaria 2, Czech Republic 3, Denmark 7, Egypt 1, Ecuador 5, Philippines 1, France 9, Greece 4, Netherlands 9, Croatia 42, Italy 12, Israel 12, South Africa 1, Canada 18, Kazakhstan 25, China 4, Kosovo 238, Jordan 1, Cuba 4, North Macedonia 56, Moldova 6, Germany 66, Pakistan 1, Poland 2, Romania 2, Russia 1,269, United States 46, Slovakia 2, Slovenia 16, Spain 4, Serbia 1,540, Switzerland 6, Sweden 8, Turkey 97, United Kingdom 6, and Ukraine 422. (4,509). It is necessary to provide adequate accommodation capacities for the appropriate accommodation of foreigners under temporary protection, necessary assistance, and basic means for living.

Administrative barriers complicate access to healthcare and employment due to the lack of a personal identification number compatible with state information systems for social, health insurance, and employment (Pages 62-66 of the European Commission Report on Montenegro for 2023). Additionally, communication difficulties due to language barriers further complicate access to many rights, including the right to work.

The state of economic, social, and cultural rights, as well as the measures taken by the competent authorities to achieve them, remains below the standards prescribed by confirmed and published international instruments in these areas. The realization of these rights depends on the economic development of the country, and these rights can be fully realized only gradually, but this does not diminish the state's obligation to continually take measures to ensure the necessary level of economic, social, and cultural rights. The situation is particularly difficult for the unemployed, who are numerous, and even those employed often work the hardest jobs that the local population avoids.

In this area, it is necessary to intensify activities to reduce the unemployment rate through effective active employment policies, and take more effective measures to ensure that economic entities, i.e., employers, fulfill their obligations by providing employees with the right to regular payment of wages, overtime wages, wages for work during national and religious holidays, social contributions, as well as respecting other rights.

Montenegro has done a lot in this field, but the problem of integrating people into the local community remains due to cultural differences and discrimination.

<sup>34</sup> Ministry of Education data 01-007/23-918/2.

## VII.I. PERSONS WITH GRANTED TEMPORARY PROTECTION - REFUGEES FROM UKRAINE - MASS INFLUX

The integration of asylum seekers and foreigners under subsidiary protection is a weak link in the system of international protection in Montenegro. The international protection system is such that it creates a new number of social cases. Mainly, these are individuals who, even after several years of residence in Montenegro, are unemployed and recipients of social assistance. A serious obstacle to integration is the language barrier.

There is also a lack of interest in obtaining protection due to a series of socio-economic and societal factors, and a restrictive asylum policy, which together has a disincentive effect on migrants.

Integration is a complex process, and Montenegro has been at the beginning of this process for a long time. Local self-government units, as one of the key actors in the integration process of asylum seekers and persons under subsidiary protection, are not sufficiently recognized. Most persons under international protection reside in the capital city of Podgorica, while in other cities these individuals are almost non-existent, so integration has not been perceived as a problem.

In the Strategy on Migration and Reintegration of Returnees in Montenegro for the period 2021-2025, in the part concerning the integration of asylum seekers, the role of local self-governments is completely neglected. Only in one activity is the local self-government unit recognized as one of the actors, specifically in the part concerning the organization of workshops for actors in the field of integration, which would deal with creating conditions for the successful integration of asylum seekers and foreigners under subsidiary protection. The implementation of all other key activities in the fields of employment, housing, education, health, and social protection is the responsibility of state institutions, i.e., individual ministries, relying on the financial support of traditional allies and international organizations.

In line with available programs and employment opportunities, the Employment Agency of Montenegro provides certain support for the employment of this category of individuals, with a notable level of cooperation and understanding of their needs and issues, although the support is limited (low in number). The first, and for many years the only, employment program offered to foreigners with approved international protection is through the Public Works program "Let It Be Clean," which involves work on maintaining public hygiene and waste removal.<sup>35</sup>

However, no specific employment programs have been developed, and the existing ones are not adapted to individuals granted international protection, whether they have little or no education or possess a good general education.

<sup>35</sup> "Let it be clean" project

## VII.II. The Right to Montenegrin Citizenship - An Illusory Right?

Since 2007, when the asylum system was established in Montenegro, there has been no recorded case of obtaining Montenegrin citizenship on the basis of granted asylum. Although there is currently a small number of asylum seekers in Montenegro, there are cases that can be considered in the context of the possibility of obtaining Montenegrin citizenship. The possibility of receiving Montenegrin citizenship for asylum seekers is currently more declarative in nature. The conditions defined by the Law on Montenegrin Citizenship<sup>36</sup> are restrictive because in practice asylum seekers cannot meet these conditions. On the other hand, foreigners with subsidiary protection cannot obtain Montenegrin citizenship as the Law on Montenegrin Citizenship does not recognize them. Obtaining a release from previous citizenship and obtaining a certificate of no criminal record, which is insisted upon in Article 8 of the Law on Montenegrin Citizenship, puts these individuals in an unequal position compared to other categories of foreigners and practically deprives them of the possibility of applying for Montenegrin citizenship.

Additionally, the Law on Foreigners<sup>37</sup> in Article 44 prescribes that a temporary residence permit for family reunification is issued to a foreigner who is a close family member of a Montenegrin citizen or a close family member of a foreigner who has been granted permanent or temporary residence in Montenegro. A close family member, for the purposes of paragraph 1 of this article, is considered to be: 1) spouses; 2) their minor children born in or out of wedlock; 3) children of one of the spouses and adopted children, up to the age of 18; 4) parents or adoptive parents of minor children.<sup>38</sup> Exceptionally, from paragraph 2 of this article, another relative may be considered a close family member if there are special personal or humanitarian reasons for family reunification in Montenegro.

Article 12 of the Family Law<sup>39</sup> prescribes: The life partnership of a man and a woman that has lasted at least three years (hereinafter: common-law marriage) is equated with marriage in terms of the right to mutual support and other property-legal relationships. If a joint child is born in a common-law marriage or it continues with the conclusion of a marriage, this common-law marriage is equated with marriage in terms of the rights from paragraph 1 of this article even before the expiration of the three-year period. However, in practice, it is very difficult to prove the existence and duration of a common-law marriage for foreigners and to obtain a temporary residence permit, and later it is impossible to obtain permanent residence. All this collectively prevents these individuals from achieving both economic and social rights.

<sup>36</sup> Law on Montenegrin Citizenship ("Official Gazette of Montenegro", Nos. 13/2008, 40/2010, 28/2011, 46/2011, 20/2014, 54/2016, and 73/2019)

<sup>37</sup> Law on Foreigners ("Official Gazette of Montenegro", Nos. 012/18 of February 23, 2018, 003/19 of January 15, 2019)

<sup>38</sup> European Court of Human Rights (ECHR), in the case of *Fosi v. Greece and Saudin v. Greece*, October 28, 2010 (discrimination regarding the mother's allowance in large families officially recognized as political refugees, based on national origin). *Niedzwiecki v. Germany and Okpisz v. Germany*, October 25, 2005 (discrimination regarding child benefits based on permanent residence permits).

<sup>39</sup> Family Law ("Official Gazette of the Republic of Montenegro", No. 001/07 of January 9, 2007, "Official Gazette of Montenegro", Nos. 053/16 of August 11, 2016, 076/20 of July 28, 2020)

## VIII. STATELESS PERSONS – PERSONS WITHOUT CITIZENSHIP

8. In Montenegro, the number of stateless persons fluctuates depending on different sources and data collection methodologies. Statistically, these individuals are most often Roma and internally displaced persons from Kosovo. An agreement between the Government of Montenegro and the Government of the Republic of Kosovo on the subsequent registration of internally displaced persons from Kosovo residing in Montenegro into the registers of the Republic of Kosovo stipulates that the competent authorities of Kosovo, within their jurisdiction, must ensure the necessary conditions for subsequent registration in the primary civil registers based on a document that proves any relevant information regarding civil status.

According to the Law on Non-Contentious Proceedings<sup>40</sup> regarding the determination of place and date of birth, Article 70a states that the court determines the time and place of birth of a person who is not registered in the birth register.

According to the data from the Report on Work and Situation in the Administrative Areas under the Competence of the Ministry of Interior, with the organizational unit of the Ministry responsible for police affairs for 2023,<sup>41</sup> 3,125 applications for Montenegrin citizenship were submitted, 1,214 cases from the previous period were unresolved, and 1,075 cases were resolved.

These figures indicate that these individuals face significant obstacles in the process of determining citizenship in Montenegro because without registration in the birth register, it is not possible to realize the right to citizenship, and the processes of registration and issuance by the Ministry of Interior take a long time.

However, it is noted that through active participation in the global UNHCR campaign, within which a global plan for the elimination of statelessness for the period 2014–2024 was adopted, Montenegro, at the Global Forum on Statelessness (Geneva 2019), took on obligations, which include, among other things: ensuring the registration of children abandoned by their mothers or whose mothers do not have identification documents; strengthening the procedure for determining the status of stateless persons, harmonizing regulations to ensure uninterrupted access to rights for individuals who have obtained citizenship from countries in the region.<sup>42</sup> Regulating the status of these individuals allows them access to employment, social and health protection, and all human rights enjoyed by the local population.

<sup>40</sup> Law on Non-Contentious Proceedings ("Official Gazette of the Republic of Montenegro", Nos. 027/06 of April 27, 2006, "Official Gazette of Montenegro", Nos. 073/10 of December 10, 2010, 020/15 of April 24, 2015, 075/18 of November 23, 2018, 067/19 of December 11, 2019)

<sup>41</sup> file:///C:/Users/Win/Downloads/izvjestaj-o-rad-u-i-stanju-u-upravnim-oblastima-iz-nadleznosti-ministarstva-unutrasnjih-poslova-sa-organizacionom-jedinica

<sup>42</sup> Strategy on Migration and Reintegration of Returnees in Montenegro for the period 2021–2025, with an action plan for 2021 and 2022 - October 2020 - Ministry of Interior of Montenegro

## IX. RECOMMENDATIONS:

**Communication is Key and Free!** The most effective means to combat prejudice is establishing contact with members of the group towards whom we hold prejudices. Measures in this direction require no special financial resources, just the goodwill to work on reducing prejudices. Besides education, the media plays a crucial role by avoiding sensationalism and significantly contributing to promoting tolerance and combating hate speech.

**We Must Understand Each Other!** Given that communication with applicants (asylum seekers) is significantly hindered due to language barriers, it is necessary to find permanent and structural solutions to the problem of a lack of interpreters, in line with Directive 2005/85/EC on asylum procedures and Directive 2003/9/EC concerning the submission of applications and the procedure in the language known to the applicant, free legal aid, assistance in lodging appeals, and the right to appeal.

**Continuous Education!** Continuously work on educating police officers and other officials responsible for dealing with asylum seekers to raise awareness of international humanitarian law standards.

**No Successful Plan Without Data!** Methodologically harmonize the collection of statistical data at the state level to obtain precise and up-to-date data as a prerequisite for proper and complete planning of all measures taken at the state or local self-government levels.

**Sustainable Strategic Planning!** All future strategic documents should be based on the evaluation of the implementation of previous ones ("lessons learned") with timely provision of funds for their implementation.

**Apply International Standards!** State bodies are obliged to apply and implement convention law and the standards of the European Court of Human Rights when adopting and applying domestic regulations.

**Utilize Future Harmonization with EU Directives!** Through further harmonization of domestic regulations with EU directives, ensure the integration of all bodies in this process and improve the coordination of competent services to reduce rights violations, increase respect for migrants' rights, and reduce inequalities, including simplifying procedures for issuing/extending temporary residence and work permits. Align domestic legislation with the Reception Directive 2003/9/EC, which prescribes urgent basic care and necessary treatment, special care, and treatment of persons with psychosocial disorders, health rights, and ensure that mandatory health checks are organized upon the reception of foreigners seeking international protection in the interest of their personal and public health.

**Ensure Uniform Access!** Establish a unified system for the identification and fingerprint registration of migrants (electronic database) linked to the central biometric database.

**Interinstitutional Cooperation as a Condition!** All state bodies that decide on the rights of foreigners in extradition proceedings should cooperate interinstitutionally and apply the European Convention on Human Rights and the standards of the European Court of Human Rights expressed in relevant judgments.

**Harmonize Domestic Regulations!** Align the Law on International and Temporary Protection of Foreigners and the Law on Foreigners to enable foreigners' right to work, as well as the right to permanent residence, with a particular emphasis on properly and fully informing foreigners and acknowledging the fact that providing proof of secured accommodation and means of subsistence is a serious problem in practice because asylum seekers and foreigners under subsidiary protection are mostly unemployed and cannot provide this evidence. Include categories of foreigners not covered by the Law on Social and Child Protection, considering humanitarian law and the risk of poverty, in the social protection system. Expand the scope of foreigners needing social and child protection.

**Clarify and Consistently Apply Regulations with an Individual Approach, Not Formalistic!**

- The Rulebook on Residency Rules and House Rules in the Reception Center should explicitly define the manner and criteria for determining the amount of compensation for public transport costs (transportation costs for departure and return) for the purpose of the international protection approval procedure.
- Clearly specify the criteria in the Law on International and Temporary Protection that foreigners should use to justify the reasons for illegal entry or stay.
- Consistently apply Article 7 of the Law on Montenegrin Citizenship, which prescribes the manner of acquiring citizenship by birth on the territory of Montenegro.
- Ensure that the procedure for expressing the intention to seek international protection is fully carried out at border crossings in accordance with the law.
- In any case of accommodation in the Reception Center, ensure a medical examination of the accommodated person.

**Remove Obsolete Regulations from Legal Traffic!** Adopt a new or amend the existing Rulebook on Workbooks, which has been in force since 1983, to remove barriers for foreigners seeking international protection, who cannot obtain a workbook from the competent municipal labor secretariats due to the lack of identification documents (identity card or passport), and a personal identification number, which is a basic requirement for entering personal data into the register of issued workbooks maintained electronically.

## Pay Special Attention to Vulnerable Groups!

- Ensure systematic and sustainable provision of free legal aid to asylum seekers.
- Misdemeanor courts and judges should recognize migrants who express the intention to seek international protection and inform them about the possibilities of obtaining international protection without imposing penalties.
- Improve the criminal justice system's response to human trafficking without delaying judicial proceedings and by applying deterrent penalties. Montenegro should strengthen its capacity to detect human trafficking for all exploitative purposes and identify victims early, especially in high-risk sectors and targeted actions for particularly vulnerable groups.
- Improve support services and assistance to human trafficking victims, particularly for victims who are migrants and refugees, and especially vulnerable categories within migrants and refugees, such as women, children, and persons with disabilities.
- In the readmission procedure, special attention should be paid to certain vulnerable groups that are subject to readmission by inertia, especially due to the fact that they may be additionally endangered, such as child victims of human trafficking, women and children victims of various forms of violence and exploitation, stateless persons with specific characteristics that make them even more at risk in the process of returning to third countries or the country of origin.
- Given the particularly vulnerable position of children and the circumstance that the rights guaranteed by the Convention should be available to every child, regardless of the status of their parents, it is necessary to take measures aimed at ensuring that every child is registered in the birth registry immediately after birth in simplified procedures, regardless of whether the child's parents possess personal documents or not.
- Ensure a sufficient number and continuous training of guardians for minor asylum seekers, as well as interpreters, to enable guardians to take substantive and meaningful care of their best interests.
- Systematically regulate the inclusion of foreign children (who wish to) in the formal education system by providing support to overcome language barriers and other types of support according to the circumstances of the specific child.
- Ensure that the Law on Life Partnership of Same-Sex Persons is interpreted in line with the spirit of the law. As previously mentioned, foreigners occasionally face insurmountable administrative barriers in realizing their "life" rights; it is necessary to act carefully and in accordance with the law, considering the circumstances of each future case, avoiding any formalistic approach, and interpreting norms in line with the spirit of the law.

## **Enable a Life Worthy of Human Dignity!**

- Ensure adequate housing capacities for appropriate accommodation of foreigners under temporary protection, necessary assistance, and basic means of living.
- Continuously and coordinately work on taking measures to ensure the required level of economic, social, and cultural rights.
- Give special emphasis to integration into the local community, which must be systemically regulated and sustainable, focusing on the individual, their education, and other personal attributes to the greatest extent possible.
- The media should inform, educate, and send messages of zero tolerance towards expressing hostile attitudes towards migrants.

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