



**EU TECHNICAL ASSISTANCE
TO CIVIL SOCIETY ORGANISATIONS
IN THE WESTERN BALKANS AND TÜRKIYE**

**DG NEAR Guidelines for
EU Support to Civil Society
in the Enlargement Region
2021–2027**

2023 Assessment Report

ANNEX 4

**COUNTRY ANALYSIS
MONTENEGRO**



**Funded by
the European Union**



This study was carried out by a team of researchers under the supervision of the EU TACSO 3 project.

Lead Expert and main author: Snježana Bokulić

Data analyst and survey expert: Dr. Blerina Metanj Subashi

Country Analysis Authors:

Natasha Mazari – Albania

Kanita Kulić – Bosnia and Herzegovina

Sara Salihu – Kosovo

Aleksandra Gligorović – Montenegro

Marija Armenski – North Macedonia

Jelena Pajović van Reenen – Serbia

Ozge Konuralp – Türkiye

EU TACSO 3 Team Leader: Richard Allen

Legal Advisors

Dr. Ersida Teliti - Albania

Selim Kulić – Bosnia and Herzegovina

Miljan Vlaović – Montenegro

Maja Atanasova – North Macedonia

Dr. Robert Sepi – Serbia

Assoc. Prof. Dr. Ulaş Karan – Türkiye

Proofreading: prof. Jonathan Boulting M.A. (Eng. Lit. Trinity, Cantab)

Graphic Design: Bojan Ivanović, Brigada Design

Belgrade, Serbia, June 2024

<https://tacso.eu>

Introduction to Annex

This country analysis is an Annex to the DG NEAR Guidelines for EU Support to Civil Society 2021–2027: Assessment Report 2023.

The Guidelines outline the results towards which EU support to civil society in the enlargement region aspires in this seven-year period. This assessment provides evidence for the situation against the Guidelines' indicators for 2023, and a comparison with the baseline year, 2021.

This annex provides a summary of the evidence for assessment of the situation in Montenegro against each of the 59 indicators in the Guidelines. This annex should be read in conjunction with the main report, which is available on the tacso.eu website.

Methodology

The main report and country annexes analysis are based on data collected from primary and secondary sources. Primary research included surveys of CSOs and public officials and a legal analysis of relevant laws. Secondary sources, such as reports produced by CSOs, national human rights institutions, the government, and others, were reviewed to provide relevant information and data. The data collection and analysis refer to 2023 compared to the 2021 baseline.

The public officials' survey was conducted between 27 February and 13 March 2024. The aim was to collect the perspectives on specific relevant indicators of selected public officials who, in their work, engage most closely with CSOs. The survey consisted mostly of closed questions and was anonymous. For Montenegro, 14 responses were received from public institutions.

The assessment of CSO capacity and resilience was based on a survey of CSOs disseminated between 31 January – 19 February 2024. The survey was open to any CSOs willing to participate. It was disseminated through various channels with the support of CSOs, CSO networks, the National Resource Centre, UN agencies, international organisations and public institutions to make sure that the outreach covered a broad variety of CSOs. The relevance of responses was ensured at the data cleaning stage when respondents who indicated that they did not belong to the target group were filtered out.

One hundred and twenty-two valid responses were elicited for Montenegro, constituting 13% of the total responses from all seven IPA beneficiaries.

There were no significant differences in the sample structure of CSOs compared to 2021.

The biggest proportion, 44% of the respondents for 2023, were executive directors, 12% managers, 11% officers, and 5% board members.

Regarding gender distribution for 2023, 61% of the respondents were women, 38% were men, and 1% preferred not to disclose information of this nature.

The biggest proportion of respondents for 2023 (60%) was 41 years old and older (30% of the respondents were between 41 and 50, and 30% were over 51 years old), 25% were between 31 and 40, 13% were 21–30 years old, only 2% were below 20 years old, and 1% preferred not to disclose their age.

In total, 16% of the respondents identified as belonging to a community, minority, or marginalised group. Of those who identified as belonging to such a group, most identified as Roma.

Forty-four percent of the respondents represented CSOs established between 2011 and 2021, and 27% were part of CSOs established between 2001 and 2010. Sixteen percent were part of CSOs established between 1991 and 2000, 11% part of CSOs established after 2021, and only 2% from CSOs established in 1990 or earlier.

Almost all respondents, 99%, came from officially registered organisations, and 55% of participating CSOs were citizen associations. The rest were 2% from foundations, 10% from not-for-profit cooperatives, 1% from trade unions, 6% from non-profit organisations, and 1% from non-profit media.

Regarding the number of staff members of the CSOs participating in the survey, most of the respondents surveyed (63%) were part of CSOs with 1–10 people working at the time of the survey in an organisation (including permanent, fixed-term, full-time, part-time staff, volunteers, and interns). Eighteen percent of the respondents were part of CSOs with 11 to 20 people, 7% from CSOs with 21 to 50 people working in them, and the smallest proportion, 6%, from CSOs with more than 50 people at the time of the survey.

In terms of sector of work, respondents could choose up to three areas of work. The biggest percentage, 34% of the CSOs, worked in youth, 24% human rights, followed by 20% in the environment and climate action, 19% in education, research, and innovation, 18% in social inclusion, followed by 11% in minority rights and non-discrimination, 11% in gender equality and LGBTIQIA2s+ rights, 11% in socio-economic development and 10% in rule of law.

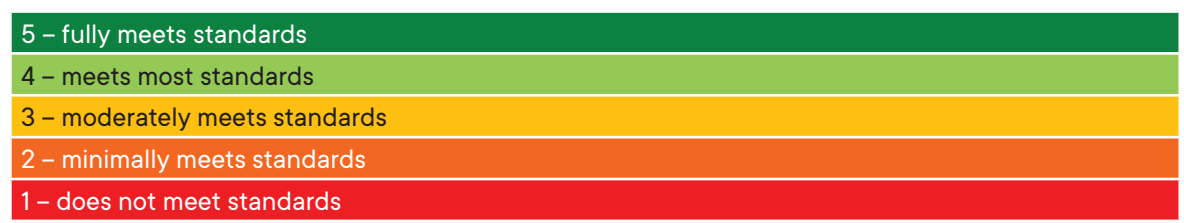
Lastly, in terms of the annual turnover of the CSOs in 2023, the biggest percent, 22% of the surveyed CSOs had a yearly turnover of between 5,001 and 25,000 EUR. This was followed by 20% of CSOs that had an annual turnover in 2023 of between 50,001 and 100,000 EUR. Sixteen percent were below EUR 5,000, whilst 16% had between 100,001 and EUR 500,000 EUR. Six percent had a turnover of more than 500 000 EUR, while 3% of the CSOs had no annual turnover in 2023.

Assessment against indicators

The data collected informed the analysis of the situation in 2023 against each indicator and the comparative values against the 2021 baseline.

The data collected informed the analysis of the situation in 2023 in Montenegro against indicators under review.¹ The indicators were reviewed and assessed following the same method used in the baseline assessment. To ensure greater clarity and accuracy of the assessment, the methodology for three indicators was enhanced with additional analysis.² The changes to simplify the CSO survey affected eight indicators for which the 2021 baseline was recalculated.³

For indicators that have a normative assessment, such as compliance with legislation or standards, the following traffic-light system was used to provide a quick visual guide:



1 The following indicators were not reviewed for 2023: 1.7.b; 1.10.e; 2.1.b; 2.1.c; 3.2.b; 3.8.c. These indicators were excluded from the review because data collection for their assessment was not feasible or because the language of the indicator was insufficiently specific to enable consistent data collection and analysis.

2 The assessment of the following indicators was enhanced with additional analysis: 1.2.a; 1.3.b; 1.6.b.

3 The baseline for the following indicators was recalculated: 1.1.a; 1.4.a; 1.5.b; 1.7.d; 1.9.a; 3.3.a; 3.4.a.

The traffic light system was applied to those indicators where such an assessment was deemed meaningful. It was based either on the data collected through the CSO survey or on the detailed analysis of applicable laws, policies and procedures against standards. The justification of the assessment is available in the respective IPA Beneficiaries reports and related analysis in Annexes 1-7.

The remaining indicators provide an overview of year-on-year trends building on the baseline established in 2021.

The report compiles the assessments and level of implementation of individual indicators following the structure of specific objectives under each of the three areas.



Specific Objective 1

A conducive environment for civil society to carry out its activities is in place.

SO 1.1. All individuals and legal entities in the Enlargement Region can establish, join and participate in non-formal and/or registered organisations, can assemble peacefully and can express themselves freely.

Indicator 1.1.a: Extent to which relevant domestic legislation provides that:

- Associations can be established or registered without discrimination on any grounds;
- No unlawful restrictions are placed on the scope of their activities or pursuit of their objectives;
- Their termination may only occur following a decision by an independent and impartial court;
- No unlawful restrictions are placed on freedom of peaceful assembly;
- Freedom of expression is exercised by all, and no unlawful restrictions imposed.

2021 assessment:

4 – meets most standards

2023 assessment:

4 – meets most standards

The legal framework regulating all three rights (freedom of assembly, freedom of assembly, and freedom of expression) remained the same in Montenegro in 2023.

Regarding **freedom of association**⁴, although constitutional and legal provisions are in line with international standards (Council of Europe Convention on Human Rights and Recommendation CM/Rec (2007) 14 of the Committee of Ministers of Member States on the Legal Status of Non-Governmental Organizations in Europe) and the practice of the European Court of Human Rights, the most significant shortcoming is the fact that Law on NGOs prescribes the Administrative Court's competence to decide on the prohibition of NGO's registration. , the compatibility of the provisions of Article 18a of the Law on NGOs with the Constitution and with international standards is disputed in terms of the competence of the Administrative Court to decide on the request for registration in the Register of NGOs. Specifically, according to the principle of separation of powers among the legislative, executive and judicial branches, enshrined in Article 11 of the Constitution, the Constitutional Court should have exclusive authority to decide whether the goals of the NGO are prohibited by the Constitution and the law, and to decide on the grounds for prohibition of NGO' registration. Furthermore, Article 149⁵, paragraph 1, item 6 states that the Constitutional Court decides on a ban on the work of a political party or non-governmental organisation – so it should not be part of the competence of the Administrative Court to decide on the request for registration in the Register of Non-Governmental Associations, as prescribed by the Law on NGOs⁶.

Also, institutional capacities require certain improvements that would further strengthen the effective and consistent application of the Constitution and laws at all levels. This was especially evident during

4 Regulated by the Constitution and the Law on Non-Governmental Organizations.

5 Constitution of Montenegro: CONSTITUTIONAL COURT OF MONTENEGRO. Jurisdiction, Article 149 The Constitutional Court decides: 6) on the prohibition of the activities of a political party or a non-governmental organisation.

6 Article 18a of the Law on NGOs: Refusal of registration: "The registration of a non-governmental organisation in the appropriate register referred to in Article 14 of this law shall be refused if the objectives specified in the statute of the non-governmental organization are contrary to the Constitution or the law. An appeal against the decision referred to in paragraph 1 of this Article may be filed with the Administrative Court of Montenegro."

2023 on account of the political changes that took place in a short period of time, which was reflected the slow process which could be observed in the registration of organisations in accordance with the Law on Non-Governmental Organisations.

There were no cases in Montenegro in this period where authorities terminated associations in ways not prescribed by law.

The legal framework that regulates the area of **freedom of peaceful assembly** in Montenegro has not been changed. The Law on Public Gatherings and Public Events is harmonised with international standards as was the case in the previous analysis. However, there is a space and need to improve this law in the future - for example, to make amendments to the Law on Public Gatherings and Public Events and, more precisely, to regulate the term “**spontaneous gathering**”, so the actions of police officers could be more closely regulated in the case when this type of gathering occurs and any type of selective action by police officers would be excluded when there is a “**spontaneous gathering**” of citizens.

According to Ministry of the Interior Affairs’ Report on the application of the Law on Public Gatherings and Public Events for the year 2023⁷, 422 public gatherings were held in the territory of Montenegro in 2023. About 215,000 citizens attended all types of public gatherings (registered, unregistered and spontaneous) in 2023 on the territory of Montenegro. The structure of “secured” public gatherings (police officers overseeing the security) in 2023 was the following: 45 political, 193 socio-economic, 79 religious and 73 «other» public gatherings.

Of the total number of public gatherings, 311 were reported, 97 were held unannounced, and 14 were spontaneous. Of the total number of public gatherings - 422, police officers of the Police Administration secured 390 of them.

Regarding **freedom of expression**, there were no changes to the legislative framework in the indicated period, but intensive work is being done on the preparation of a new set of laws on media and a new Law on Free Access to information⁸, still to be adopted.

The Constitutional Court of Montenegro did not make decisions in the indicated period in relation to the freedom of association or peaceful assembly. Also, in the indicated period, there were no decisions of the European Court of Human Rights in relation to Montenegro, which refer to Article 10 of the European Convention on Human Rights and Fundamental Freedoms. Precise information about the number of court decisions brought in 2022 and 2023 in this area is not available on the judicial portal, or in annual reports on the work of judicial institutions.

7 Report on the application of the Law on Public Gatherings and Public Events, for the year 2023 (Ministry of Interior Affairs, Police administration, Department for Public Order and Peace, <https://wapi.gov.me/download/15d3f40c-c381-457f-948d-74deda45b9c6?version=1.0>)

8 According to the current announcements, Drafts of three laws from the set of media laws have been prepared (but are still to be adopted): Law on amendments and additions to the Law on Media; Law on National Public Broadcaster, Radio and Television of Montenegro; Law on Audiovisual Media Services.

SO 1.2. Public authorities protect CSOs from interference and attacks and respect their right to privacy.

Indicator 1.2.a: Extent to which CSOs have access to an effective remedy to challenge or seek review of decisions affecting exercise of their rights.

2021 assessment:

4 – meets most standards

2023 assessment:

4 – meets most standards

Compared to 2021, no changes have happened that affected CSOs' access to an effective remedy to challenge or seek a review of decisions affecting their rights. NGOs are also entitled to use the constitutional appeal in proceedings before the Constitutional Court, seeking damages for violations of constitutionally recognised human rights, including the right to association, peaceful assembly and freedom of expression, given that the Constitutional Court has the authority to review all alleged constitutional and human rights violations. If it finds a violation, it vacates the lower court's decision and refers the case to an appropriate court or authority to rectify the deficiency. Upon exhaustion of all available domestic remedies, individuals and legal entities, regardless of citizenship or seat, may appeal cases alleging government violations of the European Convention on Human Rights at the European Court.

Therefore, all procedural laws in Montenegro ensure the right to an effective legal remedy through regular and extraordinary legal remedies, and protection is enjoyed by both natural and legal entities, including NGOs. Nevertheless, the entitlement to legal remedies needs to be practical and effective. According to the Report by Montenegro's Agent before the European Court of Human Rights from 2021, administrative disputes last long, and for that reason, the Agent has recommended that judicial authorities carry out efficient supervision over the implementation of the Law on Administrative Procedure⁹, especially in the areas of timely action and adoption of administrative acts by the first instance and second-level public law bodies within the legal terms¹⁰, but this commendation is yet not implemented.

Therefore, all procedural laws in Montenegro provide the right to an effective legal remedy through regular and extraordinary legal remedies, and protection is enjoyed by individual and legal persons, including non-governmental organisations. Also, everyone has the right to submit a constitutional appeal, as well as an application to the European Court of Human Rights. However, concerns remain regarding the duration of administrative disputes. According to the Report of the Administrative Court for 2022, the Administrative Court in the period from 1 January 2022 until 31 December 2022, had a total of 22,381 cases under way, which is more cases under way than in previous years (15,107 in 2021). The average duration of an administrative dispute in 2022 was 532.4 days.

Unfortunately, the report for 2023 had not been published at the time of preparation of this assessment.

According to the CSO Survey results, 17% of the CSOs stated that in 2023 the authorities made decisions that negatively impacted their ability to exercise their rights. In total, only **4% stated they were able to effectively challenge such decisions** through official, legal, judicial and administrative channels, and 8% declared that they were not able to challenge such decisions. The proportion shows the same percentage of those able to challenge these decisions in 2023 as in 2021, but a 10% decrease in those unable to challenge such decisions compared to 2021, when 18% of CSOs stated that they were not able to challenge such decisions.

⁹ Law on Administrative Procedure, available at: https://www.paragraf.me/propisi-crnegore/zakon_o_opstem_upravnom_postupku.html

¹⁰ Report on the Work of the Office of the Representative of Montenegro before the European Court of Human Rights in Strasbourg for the year 2021 – conclusions (July 2022), available at: <https://www.gov.me/en/documents/9d5004de-f356-4c34-b981-46bf1026ba77>

Indicator 1.2.b: Extent to which CSOs are protected by law from threats, attacks, judicial harassment and discriminatory treatment, in particular:n, as well as hate speech online and offline;

- threats including intimidation, harassment, defamation, as well as hate speech online and offline;
- attacks including acts of violence, physical abuse, searches and damage to property;
- judicial harassment including arbitrary arrest and detention, unlawful interference with communications, and abuse of criminal, civil and administrative proceedings. or threats thereof;
- discriminatory treatment, including disproportionate reporting requirements for CSOs..

2021 assessment:

4 – meets most standards

2023 assessment:

4 – meets most standards

here were no changes in the legislative framework when compared to the report for 2021.

There is no legal definition of attacks or threats specifically against CSOs in the Montenegrin legal system, but the legal system contains many provisions which prohibit threats, attacks, judicial harassment and discriminatory treatment, and protects natural persons and legal entities from such treatment, including CSOs. Only in the case of two criminal offences - Prevention of Political, Trade Union or Other Association and Activities, Article 182 of the Criminal Code¹¹, and the Law on Racial and Other Discrimination (Article 443) – does Montenegrin law refer to organisations, which include CSOs. Specific laws such as Article 182 of the Criminal Code and the Law on Racial and Other Discrimination does refer to organisations, including CSOs, and provides protection against various forms of harassment and discrimination. Additionally, Article 7 of the Law on Prohibition of Discrimination is crucial for advocacy and human rights CSOs, as it addresses harassment based on various grounds and considers such actions as discrimination. Despite the robust legal protections, the absence of a targeted legal definition of attacks or threats specifically against CSOs and the need for further specificity in legislation, warrant a mark of 4, indicating that while most standards are met, there is still room for improvement.

Indicator 1.2.c: Proportion of CSOs that operate effectively without threats, attacks, judicial harassment and discriminatory treatment, in terms of:

- number of complaints concerning lack of protection of CSOs;
- number of attacks on CSOs and their members;
- number of instances of damage to property;
- number of instances of discriminatory treatment in reporting;
- number of instances when CSO offices were unlawfully searched, or subjected to inspections;
- number of instances of interference with the communications of CSOs.

According to the CSO Survey results for 2023, 76% of CSOs stated that they were able to operate effectively without threats, attacks, or judicial harassment in 2023. In 2021, this percent was bigger - 82%; so we have a decrease, a -6% point change, when compared to 2021.

Only 2% responded that their organisation was subject to threats or physical attack, with in 9% of cases the object of the aggression being its members, and in 4% of cases, both organisation and members.

Only 1% of organisations stated they submitted an official complaint because they had been denied protection from threats or physical attacks (1 CSO, and 4% of members i.e. 5 persons). In 2% of cases, the organisation experienced property damage.

¹¹ Criminal Code, Official Gazette of Montenegro, Nos. 57/2009, 49/2010, 47/2014, 2/2015, 35/2015, 58/2015, 28/2018, 116/2020, 145/2021, available at: <https://www.paragraf.me/propisi-crnegore/krivicni-zakonik-crne-gore.html>

Only 2% of CSOs stated that the offices of their organisations were subjected to unlawful searches or unlawful inspections (96% not, 3% unsure).

According to the **Public Authorities Survey**, the vast majority of respondents thought that CSOs were sufficiently or very able to operate effectively without threats, attacks, judicial harassment and discriminatory treatment.

SO 1.3. Measures used to fight extremism, terrorism, money-laundering or corruption are targeted and proportionate, in line with the risk-based approach, and respect human rights standards on freedom of association, assembly and expression

Indicator 1.3.a: Extent to which laws to combat extremism, terrorism, money-laundering and corruption do not unduly restrict legitimate activities of CSOs.

2021 assessment:

5 – fully meets standards

2023 assessment:

5 – fully meets standards

In the legal framework there are no specific provisions which restrict the activities of CSOs, and there were no applicable changes to the laws governing this issue in 2022 and 2023.

Indicator 1.3.b: The proportion of CSOs whose ability to undertake legitimate activities is not restricted by the implementation of laws to combat extremism, terrorism, money-laundering and corruption, and in particular by:

- being judicially harassed for their alleged connections with extremism, terrorism, money-laundering and corruption;
- discriminatory restrictions placed on funding,
- authorities or banks preventing them from opening bank accounts, sending or receiving money.

According to the findings of the CSO Survey, in 2023 the vast majority (**89%**) of CSOs stated that **they were able to undertake legitimate activities without restrictions such as judicial harassment, discriminatory restrictions placed on funding or being prevented from opening bank accounts and receiving money.** This shows us that situation has further improved - the proportion of CSOs (89%) slightly increased in 2023, as compared to 2021 (86%).

According to the CSO Survey, no CSOs in 2023 were prevented by government authorities or banks from opening a bank account or sending or receiving money. The same situation applied in 2021.

SO 1.4. Public authorities should treat all CSOs equally with regard to their operations, and equitably with other entities (such as businesses)

Indicator 1.4.a Extent to which laws (1) do not require CSOs to submit more reports and information, and (2) do not submit CSOs to more inspections and sanctions, than business entities, all else being equal.

2021 assessment:

5 – fully meets standards

2023 assessment:

5 – fully meets standards

There were no changes in the legislative framework in the indicated period: according to the legislation in force, NGOs fall under the regular regime of the civil liability and liability of the legal entities. They are not subject to more inspections and sanctions than business entities.

SO 1.5. Central and/or local public authorities have enabling policies and rules for small community organisations and civic initiatives (grass-roots organisations)

Indicator 1.5.a: Small community/local organisations and civic initiatives are allowed to operate by law without registering.

2021 assessment:

5 – fully meets standards

2023 assessment:

5 – fully meets standards

Article 53, paragraph 1 of the Constitution of Montenegro guarantees the freedom of political, trade union, and other forms of organization and activity, without prior approval, following registration with the competent authority. Although both the Constitution and the Law on NGOs refer to the mandatory registration of NGOs, the Law on Non-Governmental Organisations does not prescribe misdemeanour sanctions for organisations that operate without registration. Under this law, non-governmental organisations (NGOs) include *non-governmental associations*, which are voluntary, non-profit membership organisations established to achieve specific goals and interests, and *non-governmental foundations*, which are voluntary, non-profit organisations without membership, established to achieve general goals and interests, with or without initial assets. Although not forbidden to work, non-registered associations cannot get funding from national public sources, because distribution of funds is done in line with the Law on NGOs, meaning that they must have the status of a legal entity registered in line with this specific law, to be eligible to apply for the state budget.

Indicator 1.5.b: In law, unregistered small community/local organisations and civic initiatives enjoy the same right to participation in decision-making processes as registered CSOs.

2021 assessment:

3 – moderately meets standards

2023 assessment:

3 – moderately meets standards

There were no changes in the legislative framework compared to the report for 2021.

This framework moderately meets standards because the **Law on Public Administration**¹² that regulates participation in public decision-making processes and prescribe the possibility for organisations to take part in public discussions, and in working groups involved in law and strategy preparation, states that only registered NGOs (associations and foundations) can nominate representatives to these working groups, thus excluding unregistered and newly formed groups from participating in that way¹³. This exclusion limits diversity of input and reduces the representation of emerging or informal organisations in the process of creation of policy documents.

Additionally, Article 4 of the Regulation on the election of representatives of CSOs to the working bodies of state administration bodies and the conducting of a public hearing in preparation of laws and strategies states that “an organisation can nominate its representative to the working body **if**, among other things, **it has in the previous three years** conducted research, created a document, organised a meeting or implemented a project aimed at improving the situation in a certain area; and submitted to the tax authority the application for the previous fiscal year (photocopy of balance sheet and income statement)” – which **not only prevents unregistered groups but also newly formed groups from participating in working groups and decision-making**.

However, there is still the possibility for unregistered small community/local organisations and civic initiatives to take part, but only during public hearing phase or in specific processes led by some specific parts of the government, because some other laws and regulations¹⁴, such as the Rules of Procedure of the Government of Montenegro¹⁵, permit even individuals, including scientists and experts, to participate; however, these provisions do not fully compensate for the lack of involvement from unregistered groups in general.

12 Official Gazette of Montenegro, Nos. 78/18, 70/21 and 52/22), <https://me.propisi.net/zakon-o-drzavnoj-upravi/>

13 The detailed criteria and procedure for the selection of organisations' representatives in working groups and other working bodies formed by state administrative bodies, as well as the procedure for conducting a public discussion, are determined by the Regulation on the election of representatives of CSOs to the working bodies of state administration bodies and the conducting of a public hearing in preparation of laws and strategies (Official Gazette of Montenegro, No. 41/18) available at the link <https://www.gov.me/dokumenta/1f353a31-1729-4db3-a378-e8c4610a5b04>

14 The domestic legislation that regulates the participation of citizens in decision-making at the national level in Montenegro includes, in addition to the Constitution, other lower legal acts, such as the Rules of Procedure of the Government of Montenegro, the Rules of Procedure of the Parliament of Montenegro, and the Law on Free Access to Information.

15 Rules of Procedure of the Government of Montenegro published in Official Gazette of Montenegro, Nos. 003/12 of 13.01.2012, 031/15 of 18.06.2015, 048/17 of 24.07.2017, 062/18 of 21.09.2018).

SO 1.6. All CSOs are free to solicit and receive funding.

Indicator 1.6.a: Extent to which relevant laws allow CSOs to seek a broad range of funding, including from abroad, without undue restrictions, as regards:

- cash and in-kind donations from all sources;
- funding from domestic public bodies;
- funding from institutional, corporate or individual donors;
- funding from foreign governments or multilateral agencies.

2021 assessment:

5 – fully meets standards

2023 assessment:

5 – fully meets standards

In 2023 there were no changes in the legal framework related to this indicator, and as in 2021, in Montenegro the relevant laws allow CSOs to seek a broad range of funding, including from abroad, without undue restrictions, as regards cash and in-kind donations from all sources, funding from domestic public bodies, funding from institutional, corporate or individual donors, and funding from foreign governments or multilateral agencies.

According to the law, CSOs are permitted to compete for government funds and any other grants and donations of an institutional, corporate or individual nature. Namely, pursuant to Article 28 of the Law on Non-Governmental Organisations, an organisation acquires assets from membership fees, voluntary contributions, gifts, donations, legacies, interest on stakes, dividends, rent, income from economic activity and in other ways that do not contradict the law.

There are no specific provisions regarding the receipt of funding by CSOs from a wide range of sources; however, CSOs have legal liability for the usage and transfer of funds and are obliged to comply with accounting standards and to file financial reports under the terms and conditions of the tax legislation.

Indicator 1.6.b: Proportion of CSOs that can access a broad range of funding without undue government interference.

According to CSO Survey results, **93% of CSOs stated that they were not subjected to arbitrary audits, frozen accounts, or the requirement to register as a foreign agent**, which is an increase of 11% compared to 2021, when this proportion was 82%. This shows an improvement of the situation.

The CSO Survey indicated that only **2% of the CSOs stated that they were subjected** to arbitrary audits or frozen accounts, or the requirement to register as a foreign agent. However, in 2021 this value was zero - there were no CSOs reporting this

SO 1.7. Public financial and non-financial support to CSOs is available in IPA beneficiaries, and provided in a transparent, accountable, fair and non-discriminatory manner

Indicator 1.7.a: The level of public funding available for CSOs and associations is clearly articulated in laws and regulations, and the rights and duties of the state body invested with the ability to set and revise the level of public funding available is clearly defined in law.

2021 assessment:

5 – fully meets standards

2023 assessment:

5 – fully meets standards

There were no changes in the legislative framework in the indicated period, and the level of public funding from national level available to CSOs is set in laws and regulations.

According to Article 32 of the **Law on Non-Governmental Organisations**, the state provides funds for financing projects and programmes of NGOs by allocating at least **0.5% of the annual budget** for a particular year, as follows:

- at least 0.3% for areas of public interest;
- 0.1% in the field of protection of persons with disabilities;
- at least 0.1% for co-financing and inter-financing of NGO projects and programmes supported by EU funds.

Indicator 1.7.b: Percentage of public budget actually disbursed to CSOs in a year.

This indicator is not reviewed for 2023.

Indicator 1.7.c: Extent to which legal provisions regulating the award of public funding to CSOs ensure that:

- funding criteria are clearly defined, objective and publicly announced;
- evaluation of proposals is clear and impartial;
- conflict of interest is clearly regulated;
- reporting requirements are clear and proportionate.

2021 assessment:

3 – moderately meets standards

2023 assessment:

3 – moderately meets standards

The **legal provisions regulating the award of state funding of the country remained the same as in 2021**, mainly governed by the Law on Non-Governmental Organisations. The obligation to publish criteria for funding is prescribed by Article 3 of the **Rulebook on the content of the public competition for the distribution of funds for financing NGO projects and programmes and the appearance and content of the application for the public competition**.

The legal framework for awarding public funding to CSOs in Montenegro includes clear criteria for funding, mandates the publication of these criteria, and requires independent assessment of proposals¹⁶. However, the lack of true independence among assessors, inconsistent reporting requirements across ministries for CSOs whose projects and programmes are funded, and potential conflicts of interest, undermine the process.

While the criteria for funding are transparent and the law includes provisions to prevent conflicts of interest, **the assessors' lack of independence** was regularly criticised by CSOs in 2023 as well as in 2021, because of the criteria for their selection; and the fact is that they are not independent, since 90% of the assessors on the list for 2023 were employees in the ministries (they were employed in one ministry and acting as "independent assessors" of projects submitted to another ministry's call for projects). Also, besides being employees in a ministry, they were very often without any experience in volunteering, project management, or the topic that they were evaluating (although such experience is one of the criteria prescribed by the regulation).

Also, Article 32b, paragraph 4 of the **Law on Non-Governmental Organisations** prescribes that the representative of non-governmental organisations in the commission cannot participate in the decision-making on the projects and programmes which are submitted by the organisation that has proposed him as the representative of non-governmental organisations in the commission. Despite the potential risk that a member of the Commission would advocate for a certain decision on behalf of the NGOs that proposed him/her for this position, s/he is not legally obliged to submit a statement on the absence of conflict interest related to his/her work in the Commission.

Indicator 1.7.d: Central governments make the information on awards publicly available and sufficiently detailed to identify individual awards.

2021 assessment:

5 – fully meets standards

2023 assessment:

5 – fully meets standards

In line with the previous indicator, the situation remained the same in 2021 regarding the openness and transparency of the central government institutions and making sufficiently detailed information about the awards publicly available. All the ministries publish information on awards on their websites, with sufficiently detailed information to identify individual awards.

According to the Public Authorities Survey for 2023, a large majority of public officials think that the extent to which relevant authorities make the information on awards of public funding to CSOs publicly available was sufficiently and fully available publicly, which is an improvement of the situation from 2021, when one third of respondents answered that the extent to which the relevant authorities made the information on public funding awards to CSOs available to the public was insufficient.

¹⁶ In accordance with paragraph 2 of Article 32v of the **Law on Non-Governmental Organizations**, the Commission for the distribution of funds is obliged to publish a public competition on the website of the state administration authority responsible for the priority area of public interest and on the e- Government portal. The **Law on Non-Governmental Organizations** stipulates that the scoring of each proposed project and NGO programme is done by the two so-called "independent assessors" from the list determined by the Ministry of Public Administration based on a public call (Article 32d).

Indicator 1.7.e: Proportion of CSOs indicating that the provision of domestic public funds is transparent, fair, and non-discriminatory.

2021 assessment:

1 – does not meet standards

2023 assessment:

1 – does not meet standards

According to the data of the CSO survey in 2023, **18% of respondents stated that state funding is transparent and fair**, which shows an improvement, since we have an increase of 8% compared to 2021.

In terms of transparency, **49% considered them not transparent or insufficiently transparent**. 28% of CSOs indicated that provision of public funding to CSOs was sufficiently transparent, and 6% indicated it was very transparent.

In terms of fairness, only 3% of CSOs said it was very fair, and 18% said it was sufficiently fair, while the majority had a negative opinion: **16% said it was not fair at all, and 43% that it was insufficiently fair**. 21% of CSOs indicated that they didn't know whether it was fair.

According to the Public Authorities Survey for 2023, more than half of the public officials participating in the public official survey stated that their institution/agency provided funding to CSOs in 2023. All public officials participating in the public official survey considered that those funds were provided sufficiently/very transparently and sufficiently/very fairly.

Indicator 1.7.f: Public funding does not exclude CSOs on the basis of their constituency representation.

According to the CSO Survey results for 2023 regarding whether CSOs have applied for public funding, 72% stated that they had applied for public funding, which was a decrease of 2% compared to 2021, when 74% of the respondents stated that they had applied.

In 2023, 68% of the respondents who applied for funding stated that the applications of their CSOs were unsuccessful, which was a decrease from 2021, when it was 77%. The perceptions of those CSOs whose applications were rejected were that mainly **(in 50% of cases)** the reason behind this was that the authorities **tended to fund their preferred organisations** (the same as in 2021). They were followed by a **proportion (34%) of respondents who believed that the competition was very strong**, and 18% who said that their proposal was not good enough.

In total, 44% of the CSOs did not apply for public funds because they believed they did not have a realistic chance of winning (in 2021, this percentage was 52.6%); and 7% did not apply because the funds offered were too small (whilst in 2021, 16% stated that the funds offered were too small). In 2023, 7% missed the application deadline, similar to the percentage in 2021, when 5.3% missed the deadline. In 2023, 15% of CSOs stated that they did not need public funding, whilst for 7%, the application procedure was too complicated.

The perception of most public officials regarding the inclusiveness of the award of public funding to CSOs for which their institution was responsible in 2023 was very positive (by inclusive, we mean a broad range of CSOs working on a vast variety of issues and representing many different communities or groups).

SO 1.8. Individuals and corporations enjoy tax benefits for their donations to CSOs.

Indicator 1.8.a: Tax legislation allows for tax relief as regards:

- Individual giving
- Corporate giving

2021 assessment:

4 – meets most standards (2021)

2023 assessment:

4 – meets most standards (2021)

Nothing changed in 2023 as regards individuals' and corporations' tax deductions following their giving of donations to CSOs in Montenegro.

Individuals and corporations have access to tax deductions. However, there are restrictions depending on the topics/areas. Also, individual and corporate giving is insufficiently practiced, owing to a lack of information and therefore an unclear administrative procedure for tax incentives

Indicator 1.8.b: Proportion of private individuals who have given money to a CSO.

According to the World Giving Index for 2023¹⁷ by the Charities Aid Foundation, the proportion of individuals who had given money to a CSO was 33%, which is a decrease compared to 2021, when it was 39%, meaning that the situation regarding giving has not improved in 2023; on the contrary, it has worsened.

This is one of the reasons why for 2023 **Montenegro has World Giving Index 27 and is ranked 127th on the list (out of 142)** (in 2021, Montenegro was 59th).

17 The report provides information that only 9% (of adults) volunteered, 33% donated money, and 38% helped a stranger.

SO 1.9. Tax benefits are available to CSOs.

Indicator 1.9.a Extent to which applicable tax laws provide for the following:

- CSO income generated from grants, donations, and membership dues, income from economic activities, investment income, real property, gifts and inheritance is not subject to taxation;
- any excess revenue or profit generated through economic activity and used for mission-related purposes by CSOs is not subject to corporate income/profit tax.

2021 assessment:

3 – moderately meets standards¹⁸

2023 assessment:

3 – moderately meets standards

Regarding the tax benefits available to CSOs, **the situation remained the same as in 2021.**

According to the Law on Profit Tax of Legal Entities, non-governmental organisations (NGOs) engaged in non-profit activities are exempt from profit tax. However, if they conduct economic activities, they must register with the Tax Administration's Central Register of Legal Entities, as outlined in the Law on Non-Governmental Organisations, and the profit generated from economic activities should be reinvested within Montenegro to fulfil the organisation's founding goals. But for NGOs registered to conduct economic activities, Article 32 of the Law on Profit Tax reduces the tax base to €4,000, provided that the profit is used to achieve the organisation's objectives; and this threshold may need adjustment over time to align with inflation and the country's economic conditions.

Article 6 of the Legal Entity Profit Tax Law¹⁹ provides a comprehensive list of entities exempt from profit taxes, encompassing a wide range of organisations involved in non-profit activities, including non-governmental organisations (NGOs), and this exemption encourages the growth and sustainability of these organisations by alleviating the financial burdens associated with taxation. Article 14(1) represented a result of CSO advocacy and a positive step towards promoting philanthropy and social responsibility, as it has expanded tax-exempt in-country donations for various beneficial purposes. By incentivising donations, the law fosters support for important societal causes, such as healthcare, education, environmental protection, and poverty reduction.

However, despite these positive aspects, there are areas in need of improvement. The distinction between the exhaustive list of public benefit activities in the Legal Entity Profit Tax Law and the illustrative list in the Law on NGOs creates ambiguity and inconsistency. Aligning these lists more closely would provide clarity and coherence in promoting public benefit activities.

What is more, while Article 14(2) specifies recognised forms of donations, ensuring transparency and accountability in the handling of donations remains crucial. Establishing clear guidelines for donation management and reporting requirements would enhance trust and confidence in the tax exemption system.

¹⁸ The baseline assessment was changed to reflect a more rigorous application of indicator criteria.

¹⁹ Legal Entity Profit Tax Law, available at: <https://www.gov.me/dokumenta/d9df63ce-558e-433e-a7af-f0129eb3f7b9>

SO 1.10. The policies and legal environment provide incentives and facilitate volunteering for and employment in CSOs.

Indicator 1.10.a: Laws regulating volunteering are adopted.

2021 assessment:

2 – minimally meets standards (2021)²⁰

2023 assessment:

2 – minimally meets standards (2021)

The situation as regards volunteering law didn't change when compared to 2021.

The Law on Voluntary Work²¹ (2010) exists but treats volunteering as a special form of labour-law relations, rather than as a voluntary, individual citizens' initiative. And a **new legal framework – a draft Law on Volunteering²² – , although underway since November 2019, has not yet been adopted by the Parliament.**

Besides treating volunteering as a special form of labour-law relations, the overarching issue also stems from the discrepancy between the Law on Voluntary Work and its practical implementation, resulting in ineffective regulation of volunteering and a lack of an environment conducive for its growth. The current legislation governs “voluntary service” rather than “volunteering” activities, leading to misunderstandings and challenges in implementation. Corporate volunteering is not accommodated, and children under 15 are prohibited from engaging in volunteer work (although high school and elementary school education programmes also encompass volunteering activities, and there are accredited programmes for that purpose).

Despite these shortcomings, the existing law outlines voluntary work, delineates volunteer rights, and promotes volunteerism through a strategy for its development. Additionally, other legal frameworks, like the Law on Youth and the Law on Non-Governmental Organisations, support and encourage volunteering, providing opportunities for youth-led initiatives and greater engagement in community development (the Law on Youth in Montenegro is founded on principles such as equality, volunteerism, solidarity, active participation, and informing young people; and the Law on NGOs permits individuals aged 14 and above to establish non-governmental organisations, providing a legal basis for the implementation of youth-led voluntary initiatives and fostering greater direct engagement of young people in community development).

²⁰ The baseline assessment was changed to reflect a more rigorous application of indicator criteria.

²¹ Law on Voluntary Work, available at: <https://www.gov.me/dokumenta/506a88a7-b783-46cb-a1ee-1151014ad9f9>

²² On account of the mistreatment of volunteering by existing legislation, after years of criticism, the Ministry of Labour and Social Welfare and its working group, with the support of the EU and its Technical Assistance (TA) to the Government project, created a draft of the Law on Volunteering; but although it has been going through the necessary procedure since November 2019, it has not yet been adopted by Parliament. Draft available at: <https://wapi.gov.me/download/da92fdc2-0045-4528-b013-c9ec78757bc2?version=1.0>

Indicator 1.10.b: Government volunteering strategies and programmes support volunteering for CSOs and have sufficient resources allocated for implementation.

2021 assessment:

1 – does not meet standards

2023 assessment:

1 – does not meet standards

The situation didn't change compared to 2021.

Although the existing Law on Voluntary Work prescribes that the role and importance of volunteer work, long-term goals, development priorities and measures for their realisation are determined by the Strategy for Volunteerism Development, in 2023 there was no active strategy in place.

Even though Montenegro was one of the first countries in the region to adopt the National Strategy for Volunteerism Development (2010–2015), since its expiration a new strategy was never created.

Indicator 1.10.c: Proportion of CSOs that benefit from state employment strategies and programmes.

According to results of the CSO Survey, 19% of CSOs indicated that they have benefitted from government employment programmes in 2023. It is a decrease when compared to the situation in 2021, when it was 31% of CSOs.

When asked about more details, the CSOs mainly referred to the professional training programme for university graduates, and so-called Public Works. Public works are local or state employment programmes aimed at increasing employment for harder-to-employ individuals registered with the Employment Agency, including long-term unemployed, persons with disabilities, and recipients of social benefits. These programmes, conducted in cooperation with various institutions and organisations, focus on socially beneficial and non-profit work, such as social care, environmental protection, and assistance to the elderly, to promote social inclusion and enhance work skills.

Indicator 1.10.d: Proportion of CSOs that benefit from state volunteering strategies and programmes.

There was no volunteering strategy in place in 2023, although the existing Law on Voluntary Work prescribes that the role and importance of volunteer work, long-term goals, development priorities and measures for their realisation are determined by the Strategy for Volunteerism Development.

Indicator 1.10.e: Proportion of employees in CSOs in relation to the total workforce.

This indicator is not reviewed for 2023.

Indicator 1.10.f: Percentage of people who have volunteered to give their time to an organisation.

According to the CAF World Giving Index Report 2023²³, the proportion of people who volunteered their time for an organisation was 9% in 2023, which was a decrease compared to 2021 (when it was 11%)

23 https://www.cafonline.org/docs/default-source/about-us-research/wgi_report_2023_final.pdf?sfvrsn=402a5447_2



Specific Objective 2

Strengthened cooperation and partnership between CSOs and public institutions.

SO 2.1. Public authorities and institutions include CSOs in decision- and policy-making processes.

Indicator 2.1.a: Laws, by-laws, strategies, other acts of public interest and policy reforms are effectively consulted with CSOs in that:

- CSOs have access to the draft document from the beginning of the drafting process to the end of the adoption procedure;
- At least 15 days are allowed for commenting before the draft document enters the adoption procedure;
- The use of extraordinary/expedited procedures to adopt legislation without allowing for consultation is an exception and duly justified;
- Reports on results of public consultations, including reasons for rejection of comments, are published in a timely fashion;
- Working groups members from CSOs are selected based on a public call, clear criteria and in line with equal treatment;
- Working group members from CSOs include representatives of society as a whole, including women's groups, LGBTIQ groups, migrant groups, minorities, disability groups, and others as appropriate, in line with the Human Rights Based Approach.

2021 assessment:

4 – meets most standards (2021)

2023 assessment:

4 – meets most standards (2021)

There is a policy framework that should ensure involvement of CSOs in decision- and policy-making processes, and the situation remained the same as in 2021 regarding the policy framework for effective consultation with CSOs in the process of drafting and adopting laws, bylaws, strategies, other acts of public interest and policy reforms. Specifically, the **Law on Public Administration**²⁴ regulates NGO participation in public decision-making processes; and the detailed criteria and procedure for the selection of CSO representatives in working groups and other working bodies formed by state administrative bodies, as well as the procedure for conducting a public discussion, are determined by the **Regulation on the election of representatives of CSOs to the working bodies of state administration bodies and the conducting of a public hearing in preparation of laws and strategies**.²⁵

The legal framework in Montenegro mandates access to draft documents and public consultations throughout the legislative process²⁶. However, shortcomings persist, such as the lack of diversity in

24 Law on Public Administration, Official Gazette of Montenegro, Nos. 78/18, 70/21 and 52/22), available at: <https://me.propisi.net/zakon-o-drzavnoj-upravi/>

25 The Regulation on the election of representatives of CSOs to the working bodies of state administration bodies and the conducting of a public hearing in preparation laws and strategies (Official Gazette of Montenegro, No. 41/18) available at the link <https://www.gov.me/dokumenta/1f353a31-1729-4db3-a378-e8c4610a5b04>

26 According to the Law, the public should have access to the draft document from the beginning of the drafting process to the end of the adoption procedure. Also, according to the Law on Free Access to Information, "the authority is obliged to publish the following information on its website: drafts, proposals and final texts of strategic documents and the plans and programmes for their implementation; drafts and proposals of laws and other regulations, as well as expert opinions on those regulations.

working group members from CSOs, and the absence of a requirement for diverse backgrounds among representatives.

While there have been improvements in the duration of public consultations and CSO representation in working groups compared to 2021, challenges remain in effectively consulting CSOs and incorporating diverse perspectives into policy development.

There is a space left for not organising a public hearing, since the Law on Public Administration prescribes three cases when a public hearing is not mandatory: a) when issues in the field of defence and security and the annual budget are regulated by law or strategy; b) in extraordinary, urgent or unpredictable circumstances; c) in the case of minor amendments to the law that do not regulate an issue with any significant difference.

Even though the Regulation mentioned above (Article 18 of the Regulation) stipulates the obligation to publish the report on public consultations promptly, and the Report should include the reasons for rejecting the proposals given, not all the ministries regularly publish reports in such a way.

According to the CSO Survey results for 2023, 31% of the respondents stated that the authorities effectively consulted their CSOs in drafting laws, bylaws, strategies, acts of public interest, or policy reforms. This proportion is smaller by 3% than in 2021, when it was 34%.

24% of all CSOs covered by survey stated they had access to the draft document from the beginning of the drafting process to the end of the procedures in 2023. That was a smaller proportion than the 26% in 2021, but similar.

In total, 26% of CSOs stated that they had been accorded at least 15 days for comment in 2023, which is an improvement compared to 22% in 2021 (+4%).

In 2023, 20% of respondents had their representative in the working groups tasked with developing laws, bylaws, strategies, acts of public interest, or policy reforms, while in 2021 this had been 23% of the CSOs that answered the Survey.

A large proportion of the public officials participating in the survey observed that CSOs were effectively consulted and informed as to the participation of their institutions in developing laws, by-laws, strategies, and other policy documents in 2023.

Thinking about the consultation processes with the public they were aware of taking place in 2023, the vast majority of public officials stated that the extent to which they took account of the views of all communities and groups affected by the laws, policies and strategies that were being discussed, was **sufficient**.

Indicator 2.1.b: CSOs are effectively included in oversight mechanisms.

This indicator is not reviewed.

Indicator 2.1.c: Proportion of CSOs that have participated in consultations during preparation of state reports under international human rights and other legal obligations, and the implementation of treaty body recommendations.

This indicator is not reviewed.

SO 2.2. Public authorities and institutions acknowledge the importance of civil society in societal policy debate and EU integration processes.

Indicator 2.2.a: Extent to which CSOs assess the attitude of public officials towards civil society as supportive.

2021 assessment:

1 – does not meet standards	13%
-----------------------------	-----

2023 assessment:

1 – does not meet standards	18%
-----------------------------	-----

According to the CSO Survey for 2023, only 18% of CSOs indicated the attitude of public officials towards civil society as being supportive (in 2021 it was 13%).

By contrast, a significant number of public officials assessed their support of CSOs as positive in 2023, with many stating it was sufficiently supportive and a notable proportion considering it very supportive.

According to the CSO Survey for 2023, 69% of CSOs indicated the attitude of public officials towards civil society as not being supportive in 2023 (in 2021, the lack of support was measured at 79%)

SO 2.3. Public authorities contribute to civil society strengthening by cooperating with civil society through strategic policy frameworks and relevant institutional mechanisms.

Indicator 2.3.a: Proportion of CSOs that were effectively consulted in the preparation of civil society cooperation strategies.

In 2023, there was no consultation process for the creation of the Strategy, because the Government of Montenegro had already adopted in July 2022 the Strategy for the Cooperation of State Bodies Administration and Non-Governmental Organisations 2022–2026, along with the Action Plan for the period 2022–2023.

Indicator 2.3.b: IPA beneficiaries have adopted currently valid civil society cooperation strategies.

2021 assessment:

1 – does not meet standards

2023 assessment:

5 – fully meets standards

The country had an active Strategy for the Cooperation of State Bodies Administration and Non-Governmental Organisations 2022–2026, along with the Action Plan for the period 2022–2023 adopted by the Government of Montenegro, in July 2022.

Indicator 2.3.c: Civil society cooperation strategies are accompanied by adopted budgeted action plans.

2021 assessment:

1 – does not meet standards

2023 assessment:

5 – fully meets standards

The Government of Montenegro adopted the Strategy for the Cooperation of State Bodies Administration and non-governmental organisations 2022–2026, along with the budgeted Action Plan for the period 2022–2023. Costs for activities planned within the Action Plan for 2022–2023, which is an integral part of the Strategy, were budgeted with 1.3 million EUR.

Indicator 2.3.d: Proportion of CSOs that rate civil society cooperation strategies as relevant and effective.

According to the CSO Survey results, only 14% of CSOs rate the national civil society cooperation strategy as relevant and effective.

Indicator 2.3.e: Public structures responsible for the implementation of civil society cooperation strategies are appropriately resourced.

The Ministry of Public Administration oversees the management of cooperation policies between state administration bodies and the civil sector, as well as regulating the operational environment for the civil sector. This includes tasks such as registering organisations, developing policies governing state-civil sector cooperation, and monitoring their implementation. According to government reports, the Ministry has been enhancing the capacities of the personnel responsible for proposing regulations related to the establishment and operation of CSOs, fostering cooperation between state administration bodies and organisations, and overseeing public hearings during law and strategy preparation. Thematic training sessions are necessary to improve the quality and efficiency of these tasks, as analyses indicate that the state administration needs to adhere consistently to the rules governing public and CSO participation in the formulation of policy and regulations .

According to a survey of public officials, a large majority of respondents perceived that this structure had sufficiently adequate human and financial resources to operate effectively in 2023.

A mechanism known as the Council for Cooperation between the Government and Non-Governmental Organisations should be aiming to advance institutional mechanisms for CSO cooperation and participation, to monitor the implementation of the Strategy for Cooperation with CSOs and to support the development of relations between the Government and civil society, but it was not existing in 2023.

Indicator 2.3.f: Mechanisms for dialogue between civil society cooperation councils and central governments meaningfully include CSOs in that:

- They have an agreed programme of work.
- They have agreed rules of procedure.
- They meet regularly.
- Rules allow CSOs to call the meetings and contribute to agenda setting.
- There is adequate follow up to conclusions and recommendations.

2021 assessment:

3 – moderately meets standards

2023 assessment:

1 – does not meet standards

There was no Council for the Cooperation of the Government and Non-Governmental Organisations in 2023.

The mandate of the previous Council for the Cooperation of the Government and Non-Governmental Organisations expired in September 2021, the last meeting was held on 28th July 2021. In the three-year term of work, the Council held 11 sessions, at which it discussed 20 items on the agenda.

The process of establishing a new Council for the Cooperation of the Government and Non-Governmental Organisations, which started in August 2022 with the publication of a Call for six CSO representatives, is still not finished. The Council is not yet established.



Specific Objective 3

CSO capacity and resilience to carry out their activities effectively are reinforced

SO 3.1. CSOs' internal governance structures follow the principles of good governance.

Indicator 3.1.a: Proportion of CSOs that have an independent and effective governing body, with clear terms of reference to oversee the organisation's strategic goals, impact, management, legal compliance, and accountability.

2021 assessment:

3 – moderately meets standards ²⁷	46%
--	-----

2023 assessment:

3 – moderately meets standards	46%
--------------------------------	-----

According to the CSO Survey results, **46% of CSOs indicated that they had an independent and effective governing body** (the same value as 2021).

A total of 84% of CSOs have a governing body (by governing body, we mean a board or council, or board appointed by the Assembly, which comprises individuals who are responsible for strategic oversight of the organisation, its legal compliance, and accountability), but 42% of the respondents reported that the executive director or another paid staff member of their organisation was a voting member of the governing body (in 2021 it was 41%).

Although part of the Global Standard on CSO accountability, in Montenegro registered associations are not legally required to have a board; this requirement applies only to foundations²⁸.

Indicator 3.1.b: Proportion of CSOs that regularly check potential conflicts of interest with regard to the political, economic and personal relationships of their governing body.

2021 assessment:

1 – does not meet standards ²⁹	20%
---	-----

2023 assessment:

1 – does not meet standards	18%
-----------------------------	-----

According to the CSO Survey for 2023, only 18% CSOs regularly (i.e. once per year) checked potential conflicts of interest with regard to the political, economic and personal relationships of their governing body, which was less than in 2021, when it was 20%.

According to the CSO Survey, **members of the governing bodies of CSOs are required by their organisations to sign a conflict of interest declaration when stepping into their roles. In the case**

²⁷ The baseline assessment was changed to reflect a more rigorous application of indicator criteria.

²⁸ According to Law on NGOs, organisations registered as "associations" are not obliged to have a board, while organisations registered as "foundations" are so obliged. For the registration of an association, the founding act, minutes of the founding assembly, and statutes are submitted along with the registration application. For the registration of a foundation, the founding act or testament (if established by testament), minutes of the founding board meeting, and statutes are submitted along with the registration application.

²⁹ The baseline assessment was changed to reflect a more rigorous application of indicator criteria.

of 41% of the CSOs, 18% have to sign it every year, but one third (31%) of the CSOs have never asked their governing body members to sign such documents.

Indicator 3.1.c: Proportion of CSOs that share relevant information on their organisation, using the means and channels that are accessible to all stakeholders in terms of publishing.

2021 assessment:

2 – minimally meets standards	33%
-------------------------------	-----

2023 assessment:

1 – does not meet standards	16%
-----------------------------	-----

CSO transparency is a vital part of good governance and accountability. In total, **16% of the respondents to the CSO Survey published their governing documents and governance structures using means and channels that are accessible to all stakeholders. This was a decrease of 17% compared to 2021, when it was 33% of CSOs.**

In relation to publishing on the website, the organisation's governing document is published by 62% of CSOs, and the structure of the organisation's board by 20%.

Indicator 3.1.d: Proportion of CSOs that have an organisational gender equality policy.

2021 assessment:

2 – minimally meets standards	39%
-------------------------------	-----

2023 assessment:

2 – minimally meets standards	37%
-------------------------------	-----

Gender equality is a vital element for the socio-economic development of peaceful societies. According to the CSO Survey, 37% of CSOs had **gender quality policies in place in 2023, which is similar to 2021, when it was 39% - but it is still lower by 2%.**

Indicator 3.1.e: Proportion of CSOs that have an organisational strategy, including vision, mission, and goals.

2021 assessment:

3 – moderately meets standards ³⁰	59%
--	-----

2023 assessment:

3 – moderately meets standards	59%
--------------------------------	-----

A defined strategy, strategic plan, mission, vision, and goals are prerequisites for successful operations and a clear direction for CSOs. In 2023, the **proportion of respondents who prepared and had such documents in place was 59%, the same as in 2021.**

³⁰ The baseline assessment was changed to reflect a more rigorous application of indicator criteria.

SO 3.2. CSOs are able to communicate the results of their activities to the public.

Indicator 3.2.a: Proportion of CSOs that have at least one on-line channel of communication.

2021 assessment:

5 – fully meets standards	98%
---------------------------	-----

2023 assessment:

5 – fully meets standards	94%
---------------------------	-----

94% of CSOs stated they had at least one communication channel in 2023 functioning regularly (i.e. at least once a month) to communicate information about their work to the public; whilst in 2021, it had been a bit higher, at 98%.

If we look at what type of channels they used in 2023, we observe that: 75% of CSOs used Facebook (95% in 2021); 39% of CSOs had a website (59.5% in 2021); 57% of CSOs used Instagram (65% in 2021); 40.8% of CSOs used YouTube (29% in 2021); 22% of CSOs used messaging apps (Viber, Telegram, WhatsApp, Signal) (39.8% in 2021); 16% of CSOs used X (ex-Twitter) – (27.6% in 2021); and 4% used TikTok 4% in 2023 (2% in 2021).

Indicator 3.2.b: Proportion of CSOs that have specialised communication staff.

In 2023, this indicator was not assessed.

Indicator 3.2.c: Proportion of CSOs that cooperate with the media.

CSOs cooperate with various partners (media, universities, municipalities, social partners, and similar) to achieve their goals and objectives and thus impact society. In 2023, **one-third (29%) of CSOs reported that they cooperated with the media (engaging in partnership)**, which was larger than in 2021, when it was 26% of CSOs.

SO 3.3. CSOs are transparent about their programme activities and sources of funding.

Indicator 3.3.a: Proportion of CSOs that publish their annual reports and financial statements.

2021 assessment:

3 – moderately meets standards ³¹	54%
--	-----

2023 assessment:

2 – minimally meets standards	37%
-------------------------------	-----

The CSOs' openness and transparency indicate accountability principles within the organisation.

According to the CSO Survey, 37% of CSOs published both their financial statements and annual reports for 2023 on their organisational website or in hard copy. The percentage was higher in 2021 (54%).

Financial statements were the most published documents - 64% of CSOs published their financial statements. In total, 53% of CSOs published their annual reports, while 19% did not publish an annual report or financial statement.

Indicator 3.3.b Proportion of CSOs that publish information on their sources of funding and amounts received in the previous year.

2021 assessment:

2 – minimally meets standards	36%
-------------------------------	-----

2023 assessment:

2 – minimally meets standards	27%
-------------------------------	-----

According to the CSO Survey results, **27% of CSOs published information on their sources of funding and amounts received. This proportion was higher in 2021 (36%).**

Indicator 3.3.c: Degree of public trust in CSOs

According to the **RCC Survey for 2023** and the Balkan Barometer, 39% of the public trust CSOs (the number represents the sum of the percentage of respondents who "tend to trust" and the percentage of those who "totally trust."), 34% Tend not to trust, 18% Totally distrust.³²

³¹ The baseline assessment was changed to reflect a more rigorous application of indicator criteria.

³² <https://www.rcc.int/balkanbarometer/results/2/public>

SO 3.4. CSOs monitor and evaluate the results and impact of their work.

Indicator 3.4.a: Proportion of CSOs that have carried out an evaluation of their work in the last year.

2021 assessment:

4 – meets most standards	77.3%
--------------------------	-------

2023 assessment:

4 – meets most standards	78%
--------------------------	-----

According to the CSO Survey, **78% of CSOs said that their organisation carried out an evaluation of project OR strategy OR internal process in 2023. This was almost the same as in 2021, when the figure was 77%.**

Most of the evaluations conducted were project-related - 68% of CSOs conducted a project evaluation in 2023 (64.9% in 2021).

This was followed by evaluations of internal processes: 18% of CSOs in 2023 (33% in 2021) stated they had carried out an internal process evaluation; whilst 14% of CSOs in 2023 (17.5% in 2021) stated they had carried out an evaluation of their strategy.

Those who did not conduct any type of evaluation, including all three forms (13%), stated that they were not required to do so and would have needed additional funds to complete it.

SO 3.5. CSOs use research and evidence to underpin their work.

Indicator 3.5.a: Proportion of CSOs whose work is based on evidence generated through research.

2021 assessment:

4 – meets most standards	80%
--------------------------	-----

2023 assessment:

5 – fully meets standards	81%
---------------------------	-----

According to the CSO Survey for 2023, the work of 81% of CSOs was based on evidence generated through research ('Survey' OR 'Public opinion survey' OR 'Randomized control trial' OR 'Desk research' OR 'Field research' OR 'Focus group meetings'). In 2021, it was almost the same percentage - 80% meaning that the change 2023 - 2021 was only 1%.

The most common methods in 2023 were: Survey with specific group 44%, Field research 41%, and Focus group meetings 41%. The most common methods in 2021 were: Consultation with the community used by 57.7% of CSOs; Focus group meetings used by 52.6%; Surveys with specific groups used by 44.3% of CSOs. Some CSOs commented that for research purposes they used association meetings with parents and members (their constituencies or target groups), or results of the research conducted by donors.

17% of CSOs did not carry out any research in 2023. Among the common reasons for not undertaking research, CSOs mentioned the following: there were no funds available; there was no need; there was lack of interest from association members; there was lack of financial support for their projects. We received similar answers from CSOs in 2021 also: lack of research resources; the feeling research was unnecessary, given their constant communication with the community; lack of projects; lack of need for research; or lack of capacity for such consultations.

Indicator 3.5.b: Proportion of CSOs whose work is informed through consultation with people who have a stake in their current or future work.

2021 assessment:

5 – fully meets standards	88%
---------------------------	-----

2023 assessment:

5 – fully meets standards	91%
---------------------------	-----

Consultation with stakeholders is an essential method of evidence collection for CSOs. In total, the majority of the respondents - 91% of CSOs - stated as essential consultations with Local communities OR 'Members' OR 'Local authorities' OR 'National authorities' OR 'Public institutions' OR 'Private businesses' OR 'Academic institutions. This is further improvement compared to 2021, when the figure was 88%.

The groups most included in these consultations were the members of the CSOs (in 62% of the cases), followed by local communities (51%), local authorities (47%), and public institutions (39%). These were followed by national authorities (33%), academia (27%) and private businesses (23%).

SO 3.6. CSOs work in fair and respectful partnerships to achieve shared goals.

Indicator 3.6. Proportion of CSOs taking part in local, central and international CSO networks.

As regards networking as a mechanism for joint goal achievement and cooperation, 71% of CSOs stated they were taking part in 'Local' OR 'National' OR 'International' CSO networks in 2023. This was an improvement compared to the situation in 2021, when it was 61% of CSOs.

During 2023, the situation was as follows: 24% of CSOs stated they were not members of any civil society networks; 23% of CSOs stated they were members of local networks; 50% of CSOs were members of national networks; and 41% of CSOs stated they were members of international COS networks.

In 2021, the largest proportion - 38% of CSOs - were part of international networks, and 37.5% of national networks. Networking on a local level was much less in evidence, with 20% of CSOs reporting they were part of local networks. The number of CSOs who stated they were not part of any network was 17.5%.

Indicator 3.6.b: Proportion of CSOs engaged in cross-sectoral partnerships with academia, social partners and private sector.

According to the CSO Survey, 43% of CSOs engaged in cross-sectoral partnerships with 'Universities' OR 'Social partners' OR 'Private sector' in 2023. This was a significant decrease - by 22% - compared to 2021, when the value was 65% of CSOs.

The greatest percentage engaged in cross-sectoral partnerships with the private sector (26%), or with universities (25%), followed by the 13% of CSOs who engaged with social partners (by social partners were meant trade unions and employer organisations).

SO 3.7. CSO have a diversified funding base.

Indicator 3.7.a: Proportion of CSOs whose sources of donor income are diversified.

2021 assessment:

3 – moderately meets standards	45%
--------------------------------	-----

2023 assessment:

4 – meets most standards	64%
--------------------------	-----

When it came to a diversified donor base, 64% of CSOs in 2023 had no single donor type contributing more than 50% of their funding.

Another 36% of CSOs therefore had at least one type of donor contributing more than 50% of their funding.

In 2021, the percentages for this indicator were the reverse. Forty-five percent of CSOs had no single donor type contributing more than 50% of their funding versus 55% of CSO having at least one type of donor contributing more than 50% of their funding. This indicates an improvement for 2023.

If we take a look at sources, local and national government was the most common source of funding, with 74% of CSOs receiving such funding. It was followed by the European Commission with 52% of CSOs receiving funding. Foreign private foundations and international CSOs were at 49% of CSOs.

These were followed by bilateral donors, with 22%, and intergovernmental organisations, 23%; domestic private foundations were at 15%.

In 2021, only 45% of CSOs had no single donor type contributing more than 50% of their funding. The European Commission was the most prominent source at 53.2%, followed by international CSOs at 46.9%. Additionally, a significant portion of funding in 2021 came from local and national governments, bilateral donors, private foundations, foreign private foundations, the United Nations, and the Council of Europe.

Indicator 3.7.b: Proportion of CSOs raising funds from sources other than donors e.g. membership fees, corporate/individual giving and income generating activities.

2021 assessment:

3 – moderately meets standards	57%
--------------------------------	-----

2023 assessment:

3 – moderately meets standards	55%
--------------------------------	-----

Regarding CSOs raising funds from other sources besides donors (membership fees, corporate/individual giving, and income generated from economic activities), according to the CSO survey responses, 55% of CSOs stated that in 2023 they had at least one other source of income in 2023 – a percentage very similar to 2021, when it was 57%.

In 2023, 3% of CSOs obtained financial support from crowdfunding, and 34% from individual donations. At the same time, 80% of CSOs did not collect membership fees, 84% CSOs did not receive funding from private businesses, and 87% CSOs did not get funding from their own business/social enterprise activity/service provision.

In 2021, 37% had said that individual donations were their second biggest source of funding, while 23.9% pointed to membership fees, and 22.1% to private businesses. Eleven percent indicated the CSOs' own business/social enterprise activity/service provisions, and 10% crowdfunding.

SO 3.8. CSOs have effective, empowered and developed human resources.

Indicator 3.8.a: Proportion of CSOs that employ staff.

In 2023, 74% of CSOs stated they had employed 1–5, OR 6–10, OR 11 or more staff in 2023. This showed an increase compared to 2021, when it was 70% of CSOs.

When asked the question in December 2023 as to how many paid staff (permanent, temporary, full-time or part-time, excluding consultants) their organisation employed, the answers were as follows: No paid staff: 25% of CSOs; from 1 to 5: 45%; from 6 to 10: 15%; and from 11 upwards: 14% CSOs.

Indicator 3.8.b: Proportion of CSOs that have organisational human resources policies.

2021 assessment:

1 – does not meet standards	1%
-----------------------------	----

2023 assessment:

1 – does not meet standards	0%
-----------------------------	----

In terms of the organisational human resources policies in place, so vital for empowering CSO workers, 0% of CSOs in 2023 stated they had all nine of them - 'recruitment policy' AND 'diversity equality and inclusion policy' AND 'disciplinary policy' AND 'grievance/complaints policy' AND 'performance evaluation policy' AND 'redundancy policy' AND 'remuneration policy' AND 'bullying and harassment policy' AND 'safeguarding of children and vulnerable adults' policies'. In 2021 also, none of the respondents had all policies in place.

According to the CSO Survey, a number of policies were, however, adopted from the list of nine, as follows: only one of them: 16%; only two: 13%; three: 10%; four: 5%; five: 3%; six: 5%; seven: 0%; eight of them: 2%. Overall, this means that 54% of CSOs had at least one policy from the list.

Indicator 3.8.c: Proportion of CSOs that have advertised publicly their staff and volunteering vacancies in the last year.

This indicator was not assessed.

Indicator 3.8.d: Proportion of CSOs that have organisational policies encouraging recruitment of a diverse workforce.

In 2023, 15% of CSOs had policies supporting a diverse workforce (recruitment and diversity, equality and inclusion policies), a slight increase of 3% compared to 2021, when the proportion was 12%.

Indicator 3.8.e: Proportion of CSOs whose staff and volunteers have attended a training course in the past year.

2021 assessment:

5 – fully meets standards	82%
---------------------------	-----

2023 assessment:

5 – fully meets standards	81%
---------------------------	-----

As regards the human resources development of CSO employees and the proportion of organisations that supported their employees and volunteers through different training programmes in 2023, the situation was similar to that of 2021: the proportion in 2023 was 81%, as compared to 82% in 2021.

In 2023, 15% of CSOs answered in the negative – 2% less than in 2021, which was at 17%.

Bibliography

- Balkan Barometer 2023 – Public Opinion, Regional Cooperation Council (RCC), available at: <https://www.rcc.int/balkanbarometer/results/2/public>
- “Contribution of non-program countries for the EU Wiki for Youth, Chapter III: Montenegro – Voluntary activities”, CoE EU Partnership for Youth, 2017, <https://bit.ly/3Hj3xG7>
- “Giving Montenegro 2022 - Report on the State of Philanthropy”, Catalyst Balkans, available at: <https://givingbalkans.org/content/giving-montenegro-2022>
- “Information on the Process of Developing the Strategy for Cooperation between State Authorities and Non-Governmental Organizations 2022–2026”, Ministry of Public Administration, available at: <https://wapi.gov.me/download/fff7d2d8-bb93-40cf-bd33-3c2ed8df9fa0?version=1.0>
- MONSTAT – Statistical office of Montenegro, <https://monstat.org/eng/index.php>
- Montenegro Protector of Human Rights and Freedoms (Ombudsperson): Report on the Work for the year 2023, published in March 2024, available at: https://www.ombudsman.co.me/docs/1681285008_finalizvjestaj_12042023.pdf
- “The state of the rule of law in Europe: Reports from National Human Rights Institutions Montenegro 2023”, ENNHRI, available at: https://ennhri.org/wp-content/uploads/2023/08/Montenegro_Country-Report_Rule-of-Law-2023.pdf
- “World Giving Index 2022”, Charities Aid Foundation, available at: https://www.cafonline.org/docs/default-source/about-us-research/caf_world_giving_index_2022_210922-final.pdf
- “World Giving Index 2023”, Charities Aid Foundation, available at: <https://www.cafonline.org/docs/default-source/updated-pdfs-for-the-new-website/world-giving-index-2023.pdf>
- Report on the application of the Law on Public Gatherings and Public Events for the year 2023, Ministry of Interior Affairs, Police Administration, Department for Public Order and Peace), available at: <https://wapi.gov.me/download/15d3f40c-c381-457f-948d-74deda45b9c6?version=1.0>
- Report of the Administrative Court for 2022. Available at: <https://www.gov.me/en/documents/ace537d0-fdfc-4aef-9b2b-2d3b917876fc>
- Report on the Implementation of the Strategy for Cooperation between State Bodies and Non-Governmental Organizations 2022–2026 for the year 2022, available at: <https://www.gov.me/dokumenta/5bf83bf5-edcc-4b6f-b2eb-acbfedb3a4bb>
- Report on the Work of the Office of the Representative of Montenegro before the European Court of Human Rights in Strasbourg for 2022 (published 20.04.2023), available at: <https://wapi.gov.me/download-preview/6207dd5b-b07f-4d51-97a4-95356dc4449c?version=1.0>
- Report on the Work of the Office of the Representative of Montenegro before the European Court of Human Rights in Strasbourg for the year 2021 – Conclusions** (July 2022), available at: <https://www.gov.me/en/documents/9d5004de-f356-4c34-b981-46bf1026ba77>
- Strategy for Cooperation between State Authorities and Non-Governmental Organizations 2022–2026 with the Action Plan 2022–2023. available at: <https://www.gov.me/dokumenta/cc6fef07-782f-4b78-8b15-fa851ccc3abf>

List of Laws Consulted

- Constitution of Montenegro, available at: <https://www.skupstina.me/me/ustav-crne-gore>
- Criminal Code, "Official Gazette of the Republic of Montenegro," no. 70/2003, 13/2004, 47/2006, and "Official Gazette of Montenegro," no. 40/2008, 25/2010, 32/2011, 64/2011 - other law, 40/2013, 56/2013, 14/2015, 42/2015, 58/2015 - other law, 44/2017, 49/2018, 3/2020, 26/2021 - correction, 144/2021, 145/2021, and 110/2023. available at: <https://www.gov.me/dokumenta/c4dcee51-ee88-430f-a8db-de91f38eadc4>
- Decree on the Selection of Representatives of Organizations in Working Bodies of State Authorities and Conducting Public Consultations in the Preparation of Laws and Strategies, "Official Gazette of Montenegro," no. 041/18 from June 28, 2018. available at: <https://www.gov.me/dokumenta/1f353a31-1729-4db3-a378-e8c4610a5b04>
- Draft Law on Volunteering, available at: <https://www.gov.me/dokumenta/7331bc28-9fa1-485c-a60b-32e8a8065031>
- Law on Accounting, "Official Gazette of Montenegro," no. 145/2021 from December 31, 2021, came into force on January 8, 2022, and the provisions of Article 9, Paragraph 3, Points 2 and 4 of this law will apply from the day of Montenegro's accession to the European Union, available at: <https://me.propisi.net/zakon-o-racunovodstvu/>
- Law on Administrative Procedure, "Official Gazette of Montenegro," no. 056/14, no. 020/15, no. 040/16, no. 037/17. available at: https://www.paragraf.me/propisi-crnegore/zakon_o_opstem_upravnom_postupku.html
- Law on Corporate Income Tax, "Official Gazette of the Republic of Montenegro," no. 65/01, 12/02, 80/04, and "Official Gazette of Montenegro," no. 40/08, 86/09, 40/11 - other laws, 14/12, 61/13, 55/16, and 146/21, available at: <https://me.propisi.net/zakon-o-porezu-na-dobit-pravnih-lica/>
- Law on Courts, "Official Gazette of Montenegro," no. 11/15, 76/20, and 54/24. available at: <https://me.propisi.net/zakon-o-sudovima/>
- Law on Free Access to Information, "Official Gazette of Montenegro," no. 44/12, 30/17, available at: <https://www.gov.me/dokumenta/f9dcdea6-e2b9-4b1a-a80c-e243a073d7b4>
- Law on General Administrative Procedure, available at: https://www.paragraf.me/propisi-crnegore/zakon_o_opstem_upravnom_postupku.html
- Law on Inspection Supervision, "Official Gazette of the Republic of Montenegro," no. 39/03, and the "Official Gazette of Montenegro," no. 76/09, 57/11, 18/14, 11/15, 52/16, and 84/24. Available at: <https://me.propisi.net/zakon-o-inspekcijskom-nadzoru/>
- Law on Internal Affairs, "Official Gazette of Montenegro," no. 070/21 and 123/21, available at: <https://www.katalogpropisa.me/propisi-crne-gore/zakon-o-unutrasnjim-poslovima-2/>
- Law on International Restrictive Measures, "Official Gazette of Montenegro," no. 56/2018 and 72/2019, available at: <https://me.propisi.net/zakon-o-medjunarodnim-restriktivnim-mjerama/>
- Law on Media, available at: <https://me.propisi.net/zakon-o-medijima/>
- Law on Non-Governmental Organizations, available at: <https://www.gov.me/dokumenta/e0a79560-b887-4a20-9de3-c1cea8ec6548>
- Law on Personal Income Tax, available at: <https://www.paragraf.me/propisi-crnegore/zakon-o-porezu-na-dohodak-fizickih-lica.html>
- Law on Public Administration, "Official Gazette of Montenegro," no. 78/2018, 70/2021, and 52/2022. available at: <https://me.propisi.net/zakon-o-drzavnoj-upravi/>
- Law on Public Gatherings and Public Performances, "Official Gazette of Montenegro," no. 52/2016. available at: <https://www.katalogpropisa.me/propisi-crne-gore/zakon-o-javnim-okupljanjima-i-javnim-priredbama-2/>

- Law on the National Security Agency”, Official Gazette of the Republic of Montenegro,” no. 28/2005, and “Official Gazette of Montenegro,” no. 86/2009 - other law, 20/2011, 8/2015, and 125/2023. available at: <https://me.propisi.net/zakon-o-agenciji-za-nacionalnu-bezbjednost/>
- Law on the Prevention of Money Laundering and Terrorist Financing, “Official Gazette of Montenegro,” no. 33/2014, 44/2018, 73/2019, and 70/2021, available at: <https://www.gov.me/dokumenta/88d9a409-56ad-48a6-9e91-b5713d770f42>
- Law on the Prohibition of Discrimination, “Official Gazette of Montenegro,” no. 46/2010, 40/2011, 18/2014, and 42/2017, available at: https://www.ombudsman.co.me/docs/1612165541_zakon-o-zabran-diskriminacije.pdf
- Law on Voluntary Work, available at: <https://www.gov.me/dokumenta/506a88a7-b783-46cb-a1ee-1151014ad9f9>
- Law on Youth, available at: <https://www.katalogpropisa.me/propisi-crne-gore/zakon-o-mladima-4/>
- Regulation on the procedure and method of co-financing projects and programs of non-governmental organizations supported from European Union funds, available at: <https://www.gov.me/dokumenta/810fa44c-f447-477e-8089-92d509943574>
- Rules of Procedure of the Government of Montenegro**, Official Gazette of Montenegro, Nos. 003/12 of 13.01.2012, 031/15 of 18.06.2015, 048/17 of 24.07.2017, 062/18 of 21.09.2018, available at: https://legislationline.org/sites/default/files/2024-01/4%20-%20Rules%20of%20Procedure%20of%20the%20Government%20of%20Montenegro_2012_am2018_ENGLISH.pdf
- Rules of Procedure of the Parliament of Montenegro, available at: <https://www.skupstina.me/en/rules-of-procedure>

