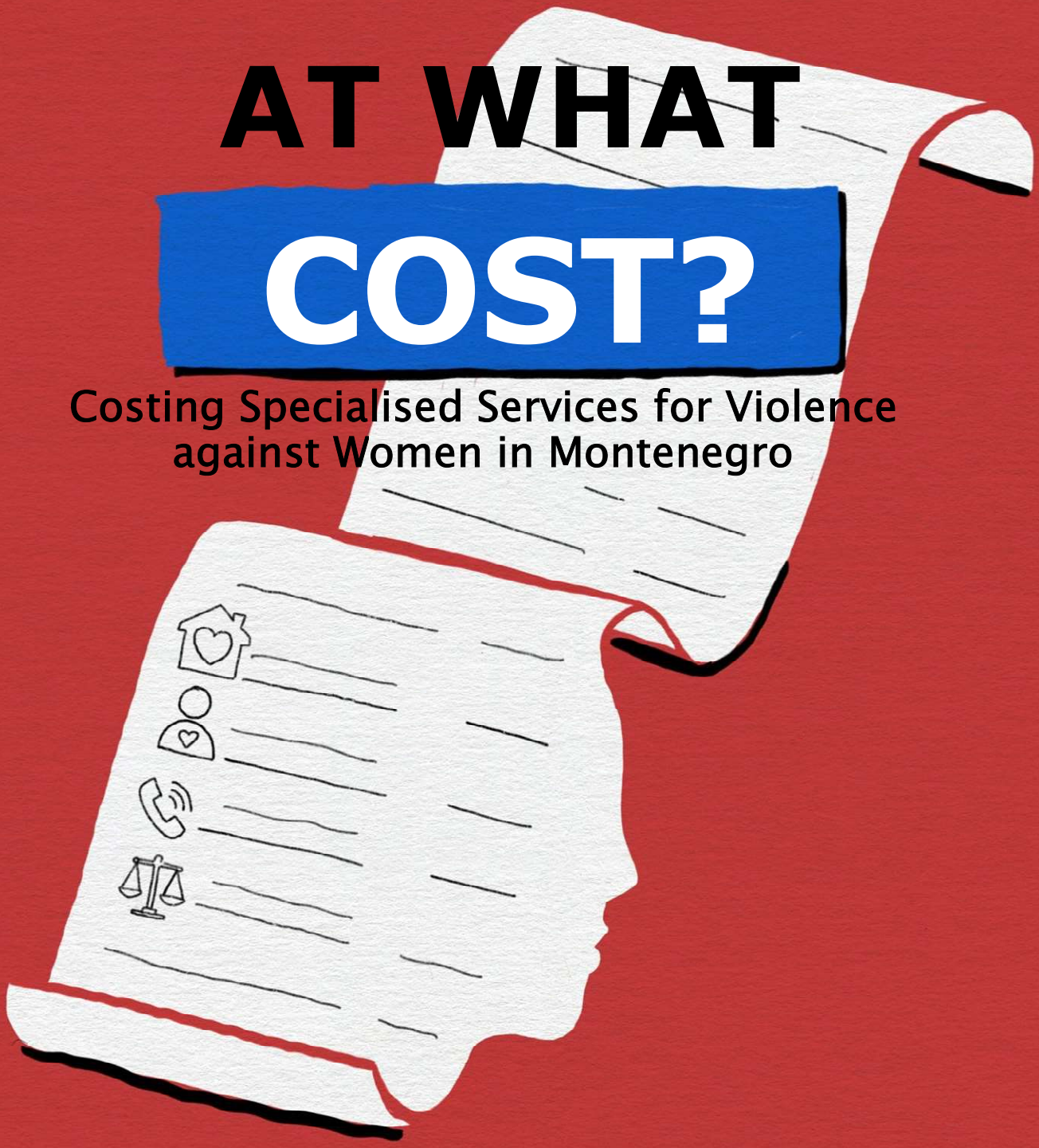
International Partnerships Austria

WOMEN'S RIGHTS CENTER
CENTAR ZA ŽENSKA PRAVA

AT WHAT COST?

Costing Specialised Services for Violence against Women in Montenegro



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CostingSpecialisedServicesforViolence against Women in Montenegro

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ACRONYMS

AP	Action Plan
BiH	BosniaandHerzegovina
CEDAW	ConventionontheEliminationofAllFormsofDiscriminationagainst Women
CoE	CouncilofEurope
CRPD	ConventionontheRightsofPersonswithDisabilities
CSP	ChildandSocialProtection
CSW	CentreforSocialWork
EC	EuropeanCommission
EU	EuropeanUnion
FPG	FiscalPolicy Guidelines
GRB	Gender-responsivebudgeting
GREVIO	GroupofExpertsonActionagainstViolenceagainstWomenand Domestic Violence
IC	IstanbulConvention
VAW	Violenceagainst Women
DV	Domestic Violence
IPA	InstrumentforPre-Accession
KWN	KosovoWomen'sNetwork
LBTIQ+	Lesbian,bisexual,trans,intersex,queerandotheridentifying MF Ministry of Finance
MH	MinistryofHealth
MHMR	MinistryofHumanandMinorityRights
MJ	MinistryofJustice
MLESD	MinistryofLabour,EmploymentandSocial Dialogue
MLSW	MinistryofLabourandSocial Welfare
MSWFD	MinistryofSocialWelfare,FamilyCareandDemography
MTBF	Medium-term Budget Framework
NA	Notavailableor applicable
NGO	Non-governmentalorganisations
OSCE	OrganisationforSecurityandCo-operationinEurope
RIA	RegulatoryImpactAssessment
SAI	StateAuditInstitution
SDG	SustainableDevelopmentGoal
SOS Bijelo Polje	SOStelephoneforwomenandchildrenvictimsofviolenceBijeloPolje SOS
NK	Women and Children Victims of Violence in Nikšić
SOS PG	SOStelephoneforwomenandchildrenvictimsofviolence UN United Nations
TBC	Tobeconfirmed
WB	WesternBalkan
WCSO	Women'srightscivilsocietyorganisation
WRC	Women'sRightsCenter

EXECUTIVESUMMARY

In 2013, Montenegro ratified and therefore undertook an international obligation to harmonise its domestic legislation with the provisions of the Istanbul Convention (IC). IC Article 8 requires states Parties to the Convention to allocate adequate financial and human resources to effectively implement policies and programmes addressing all forms of violence coveredbythisConvention,includingthosecarriedoutbycivilsocietyandnon-governmental organisations. However, Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO) monitoring has suggested that WB governments tend to lack knowledge and capacity for providing these services, provide inadequate budgeting and rely significantly on international donors and WCSOs providing specialised services.

The legal and budgetary framework in Montenegro demonstrates significant shortcomingsinboththeunderstandingandimplementationofgender-responsivebudgeting (GRB) and ensuring adequate specialised services for women experiencing gender-based violence. TheLaw onGenderEquality of Montenegro obliges allpublic andprivate entitiesin Montenegro to gender mainstream all relevant policies, as well as to conduct gender impact analysis across differentsectors andlevels of decision making.Even though Montenegrohas introduced programme budgeting, which has facilitated monitoring of budget expenditures, GRB is still not recognised by the Law on the Budget and Fiscal Policy. Mandatory rules or similar procedures for GRB implementation still have not been adopted.

This research has found that budgets for specialised services are not stated clearly and transparently, but rather through "regular budget funds" (at the central level) or in "institutions, individuals, the non-governmental and public sector" budget lines (at the municipal level). Funding for specialised services cannot be tracked, particularly at the municipallevel,duetonon-specificbudgetcallsandfundingthroughpubliccalls.Specificand transparent budget lines are essential for ensuring effective implementation, monitoring and evaluation of GRB. For this reason, Montenegro cannot clearly track the planning and execution offunds securedfor specialisedservicesrecognisedbytheIC.Inaddition,funding related to gender equality and violence against women in Montenegro is not monitored, as required by the Sustainable Development Goal (SDG) indicator 5.c.1. of the United Nations (UN)Agenda2030.Thelackofspecificbudgetlineshindersadequateandeffectivemonitoring ofexpenditures,consequentlyleadingtodifficultiesinidentifyingrealbudgetaryneedsbased on prior expenditures' efficiency and results.

Tracking public calls published by the Ministry of Social Welfare, Family Care and Demography(MSWFD)orlocalmunicipalitiesremainstheonlywaytotrackallocationoffunds for specialised services for women experiencing violence. Existing support relies heavily on donor funding and unpredictable public calls with insufficient allocations at central and local levels. This research the GREVIO finding that international donors are envisaged as the only orasupportingfundingsourceforimplementingnumerousstrategicactivitiesandmeasures. This financial dependency presents risks for implementation and undermines service sustainability.

Existing strategies and action plans (APs) should be more inclusive when planning, allocatingandimplementingfundsforspecialisedservicesforwomenwithdisabilities,aswell as women belonging to national and ethnic minorities, and lesbian, bisexual, trans, intersex, queer and other identifying (LBTIQ+) women. In Montenegro, WCSOs providing specialised services offer these servicesinclusively to all women, includingwomen belongingto national and ethnic minorities, LBTIQ+ women as well as women with disabilities.

The State should develop a list of available local government facilities to improve accessforvictimsofviolenceagainstwomentolonger-termfinancialassistance,social

housing and support finding employment to enable them to recover from violence and live independently.

The Law on Social and Child Protection of Montenegro deals with general social services and does not specifically regulate specialised services needed by women victims of gender-based violence. Notably, the IC requires such a legal provision. Regulations on licensing of specialised services in Montenegro include only general social services. Recently adopted amendments to the Law on Social and Child Protection did not tackle the issue of specialised services for women victims of gender-based violence. It is necessary to amend andformallyrecognisespecialisedservicesforwomenvictimsofgender-basedviolence,along with accompanying clear regulations and standards governing the licensing, financing and operation of these services.

The establishment of referral and rape crisis centres in Montenegro is crucial as they would guarantee adequate referral of victims to appropriate and specialised services, providing necessary care. Notably, the Montenegro Reform Agenda already envisages establishment of three rape crisis centres, to align with GREVIO's requirement to have one crisis centre per 200,000 capita.

Montenegro also lacks specialised shelter for child and forced marriage survivors. Under the IC, each form ofviolence requires tailoredservices,includingshelters designedto meet the specific needs of victims. However, existing policies and budgets for the social protection of women with disabilities, Roma and Egyptian women have not been sufficiently analysed to support the development of new social protection strategies. In some instances, the allocations foreseen have been spent as planned while others have yet to be evaluated.

Critical gaps in the Montenegrin legal and economic framework include the lack of comprehensive recognition of GRB within the domestic legal system, lack of specialised and dedicated budget lines, insufficient prioritisation of central and municipal allocations concerninggender-basedviolence,andinsufficientcrisiscentresbasedonGREVIOstandards. As emphasised by GREVIO's thematic report, Montenegro must allocate sustainable, transparentandlong-termstatefundingtosupportspecialisedservices for womenvictims of gender-based violence.

INTRODUCTION

All WB governments have committed to implementing the Council of Europe's (CoE) Istanbul Convention (IC), which obliges states to provide comprehensive, survivor-centred services for all forms of gender-based violence. However, evidence shows that WB governments oftenlack the knowledge, capacity andsufficient, sustainable public fundingto provide these services. Despite formal commitments, WB governments often fail to allocate adequate budgets for violence against women related services, instead relying on WCSOs to deliver essential support. Despite their critical role in service delivery, WCSOs are underfunded, which threatens both their sustainability and survivors' access to essential services.

To address this, a regional network of seven WCSOs is implementing the Institutionalising Quality Rehabilitation and Reintegration Services for Violence Survivors II Action, supported by the Austrian Development Agency.[1] The Action aims to strengthen and institutionalise quality rehabilitation and reintegration services for survivors of gender-based violence, using GRB methods to estimate actual costs and inform public budget allocations. This research, conducted across six WB countries, analysed state funding for specialised servicesfortreatingviolenceagainstwomenin2022-2025,includingtheroleandcostsborne by WCSOs. It compares budgeted and actual expenditures, as well as examines planned expenditures for 2026-2029.Theresearch seeks toassess theactual costs of theseservices, if provided in accordance with the IC. The research aims to support relevant institutions in medium-term and annual budget planning with evidence of budget allocations needed for quality specialisedservices for addressing violence against women in line with the IC. It also seeks to establish templates that institutions can use to continue similar budgeting in the future as part of budget processes.

AboutThisResearch:AnAbbreviatedMethodology

Themethodologyutilisedbestpracticesin GRB,drewonexistingguidanceforcosting similar services and built on KWN's internationally recognised costing methodology.[2] The research involved a unit costing approach, focusing on estimating the precise costs incurred byinstitutionsandserviceprovidersindeliveringspecialisedservicesforsurvivorsofgender-based violence. It did not examine other costs, such as related to policing, justice or employment,whichwouldrequirefurtherresearch.Nordiditexamineinstitutionalisedcosts, such as general healthcare services provided by health institutions.

Researchquestions

Themainresearchquestionsguidingthisresearchincluded:

1. To what extent have WB governments allocated and spent sufficient funds for providing specialised services for treating violence against women and domestic violence in line with the IC in 2022-2025; and budgeted sufficient funds for 2026-2029?

[1]Partners include the Gender Alliance for Development Centre in Albania, Albanian Women's Empowerment Network, Kosovo Women's Network, FoundationUnitedWomen in BosniaandHerzegovina, National Network to End Violenceagainst WomenandDomesticViolencein NorthMacedonia.Women'sRightsCentrein Montenegro, and Autonomous Women's Centre in Serbia.
[2]KWN,AtWhatCost?,2012.

2. What are the estimated costs of providing specialised services in line with IC requirements, including for supporting WCSO service providers, for 2026-2028?

ResearchMethodsandData Sources

In responding to the research questions, the methodology involved mixed methods, including:

- **Legalanalysis**ofexistinglawsandpoliciesrelatedtospecialisedservicesfortreating violence against women and domestic violence as per the IC. Data from laws, state budgets, strategies and reports were analysed to identify shortcomings in the legal framework. This involved examining the extent to which budget documents and processes have adequately involved GRB and budgeted adequately for specialised services to address gender-based violence, as per the IC.
- **Institutional analysis** of key institutions responsible for budgeting and providing specialised services for survivors of gender-based violence. Data were collected from institutions' websites, reports and existing literature.
- **Budgetanalysis** to assess the extentto whichWB governments have allocatedand spentsufficientfundsforspecialisedservicesfortreatingviolenceagainstwomenand domestic violence in 2022-2025 and planned adequate budgets for 2026-2029. This included analysing specific budget lines for these services, actual expenditures, any inefficiencies, beneficiaries and the impact of these expenditures. Data sources included government budgets, expenditure reports, audit reports, data provided by institutions and other literature.
- **Costing analysis** applied best practices in GRB to estimate the actual costs of specialised services for supporting survivors of gender-based violence, based on the IC.Itinvolvedreviewingexistingcostestimates,marketpricesandpriorexpenditures, as well as conducting interviews with key stakeholders and institutions. It seeks to inform budget forecasts for 2026-2029.
- **Interviews** with research participants included nine interviews conducted with WCSOs andrelevantmunicipal representatives, including: WRC, WCSO Lea Bar, CSO SOS Helpline for Women and Children Victims of Violence in Nikšić (SOS NK), WCSO Women'sSafeHouseinPodgorica,CentreforRomaInitiativesinNikšić,SOStelephone for women and children victims of violence (SOSPG), SOS telephone for women and children victims of violence Bijelo Polje (SOS Bijelo Polje), gender equality officers in the Municipality of Podgorica and gender equality and financial officers in the Municipality of Nikšić.

Validity

The research team employed triangulation, including mixed methods, data sources and research teams with expertise from various disciplines, as well as participant checks towards enhanced validity.

Limitations

Limitationstothisresearchincludeitsfocusonspecialisedservices.Itdidnotexamine specificcostsrelatedtoprevention(e.g.,awareness-raisingandcapacitybuilding),protection and/or justice (e.g., policing, prosecution, courts), which were beyond its scope. Exceptions mayexistwhererehabilitationandreintegrationservicesareinterrelatedwithprevention,

suchasininformationmaterialsrelated toaccessing services.Also,thisresearchfocused primarilyonvictimsofviolenceagainstwomenandonlyincludedchildrenaccompanyingtheir mothers in shelters.This research didnotlook intotraffickingin human beings,even though itis aformofgender-basedviolence,sinceitis averybroadandcomplexthematicareathat would require additional research. Lastly, this research did not include a detailed costing of the establishment and operation of a Barnahus model since it was beyond the scope of this researchandshouldbeundertakenaspartof futureplanningandimplementationprocesses. Whiletheresearchsoughttoestimateactualcosts,somedatawaslacking.Akey limitation was the inability to track allocated and spent funds due to the lack of a dedicated budgetlineunderwhichfundsforsupportservicesforvictimsof violenceagainstwomen are planned. Where information was missing, mainly for 2026–2029, data from previous years wereused,consideringtheaverageannualinflationrateinMontenegrofromtheprevious year.

Another limitation was the lack of data provided by responsible government actors. Somemunicipalities wereunresponsivetothe researcher's official requests for dataof public importance, while others provided the information mostly in writing. Municipalities that responded to data requests provided very generic information. Also, the key institutions, Ministry of Finance (MF) and MSWFD did not agree to participate in an interview, so WRC couldonly use information inresponse to official requests for access to information of public importance.

WhatIsinThisReport?

This reportisdividedin two chapters. Thefirstchapter examines the extentto which the legal framework requires GRB, particularly related to addressing gender-based violence. It also analyses the legal framework pertaining to the provision of services in line with IC requirements, examining the extent to which existing strategies and action plans for addressing violence against women in Montenegro, as well as budgets, have allocated sufficientresourcesfortheseservices.Itsummarisesinstitutionalresponsibilitiesforcollecting and maintaining data on beneficiaries and budgeting for specialised services. The second chapter examines the demand and costs of providing services in accordance with IC requirements. It discusses overall budgetary allocations and expenditures related to gender-basedviolence,aswellasestimatesneededexpensesaspertheIC.Finally,recommendations are presented. All numbers have been rounded to the nearest whole number or percentage to facilitate readability.

CHAPTER1.LEGALANALYSIS

This chapter first examines the extent to which the legal framework in Montenegro requires GRB, particularly related to addressing gender-based violence. Second, it analyses thelegalframeworkpertainingtoprovisionofspecialisedservicesinlinewithICrequirements andexaminestheextenttowhichexistingstrategiesandactionplansforaddressing violence againstwomenhaveallocatedsufficientresourcesforservices.Third,itexaminesinstitutional responsibilitiesforimplementingthelegalframework,includingGRB.Itthenanalysesmidterm and annual allocations for services.

LegalObligationsforGender-responsiveBudgeting

This section examines the extent to which the legal framework requires GRB, particularly related to addressing gender-based violence.

GRB is still not formally required by Montenegro's legal framework. The Law on Gender Equality introduced the concept of gender mainstreaming all phases of decision-making and policymaking.[3] This created an obligation for GRB to be introduced in the legal framework for budgeting and financialpolicy.Yet,theLawon Budget and Fiscal Policy only partially addresses GRB;[4] it does not include any provisions obliging GRB implementation.[5] Therefore, GRB is not obligatory for all institutions providing specialised services for victims experiencing violence against women at national and local levels.

Table1.LegalObligationsforGRB

Criteria	Finding
GRBisobligatoryforallinstitutions	No
Institutions'GRBresponsibilitiesareclear	Partially
Genderanalysisisrequiredtoplanbudgets	Yes
Monitoringbeneficiariesdisaggregatedbysexis required by law	Yes
Genderimpactanalysis(evaluation)isrequiredby law	Yes
Sex-disaggregateddataisavailablefromservice providers	Partially

WhilelegallybindingGRBrequirements arelacking,MFandother lineministries have sought to gender-mainstream key strategic documents.[6] The MF and relevant line ministries have been instructed to create gender-impact analyses and budget impact assessments on gender equality, as well as to collect sex-disaggregated data. However, strategies are not legally binding.

Gender impact analysis is required by law, since the MF issues guidelines that line institutions should use when planning budgets, which include conducting gender analysis. Montenegro'sbudgetingsystememploysprogrammebudgeting,whichcanfacilitateGRBand theintegrationofagenderperspectiveintobudgeting.[7]AlthoughtheLawonGenderEquality requires gender mainstreaming of all relevant policies and has established a legal basis for introducing GRB in Montenegro, policies are still not sufficiently gender mainstreamed.

[3]LawonGenderEquality.(OfficialGazetteofMontenegro46/07,73/10,40/11,35/15). Article3.

[4]LawonBudgetandFiscalPolicy.No.0/11/2025/115.2025.

[5]Damjanović,Minja, andXhani, Blerina. "StateofplayofGRBin Montenegro:Overviewofkeyachievements, gaps and ways forward". 14.

[6]Ibid.20.

[7] SecretariatoftheCouncil forCompetitivenessMontenegro."Gender-responsivebudgetinginMontenegro2020-2023"." 2024. 3.

A main precondition for adequate and transparent reporting, planning and implementation of GRB is collecting and disaggregating data based on sex. Monitoring beneficiaries, disaggregated by sex, is required by law; all statistical data and all other information collected, recorded or processed in public institutions, private entities and organisationsmustbedisaggregatedbysex.[8]WCSOsprovidingservicestovictimsofviolence againstwomen maintain sex-disaggregateddata. However, this datais notpublicly available inaconsolidated,anonymousform.Nordopublicinstitutionspublishsex-disaggregateddata on beneficiaries of social services related to gender-based violence. Thus, such data is only partiallyavailable,hinderingindependentreviewandanalysis.Gender impactanalysis is only partiallyrequiredbythelegalframeworkbecauseitisincorporatedonlyintheLawonGender Equality but not in the Law on Budget and Fiscal Policy of Montenegro.

LegalFrameworkRelatedtoViolenceagainstWomen

This section examines the extent to which the legal framework includes specialised services in line with IC requirements. It analyses the extent to which existing strategies and action plans for addressing violence against women and domestic violence have allocated sufficient resources for services.

InternationalObligationsunder theConstitutionofMontenegro

Adopted in 2007, the Constitution embraces the monistic principle,[9] stipulating the supremacy of international law; ratified international treaties and generally accepted norms of international law constitute an integral part of the domestic legal system andare "directly applicable when they regulate matters differently from domestic legislation". The ***UN ConventionontheEliminationof DiscriminationAgainstWomen(CEDAW)***isdirectly applicableundertheConstitution.ThisConventionregulatestheprotectionofwomenvictims of domestic and gender-based violence. The Committee, the monitoring body of the Convention, has issued specific recommendations to states, which include creating a legal frameworkthatprotectswomenandsecuringappropriateprotectiveandsupportservicesfor victims recognised under the Convention.[10]

The ***UNBeijingDeclarationandPlatformforAction*** aims to "advance the goals of equality, development and peace for all women everywhere in the interest of all humanity".[11] It emphasises eight critical areas where gender equality should be improved. Montenegro has selected areas in which it will make efforts to improve gender equality, including the general protection of women's rights and gender equality, as well as gender equality in the economy.[12] The Platform emphasises the importance of access to adequate socialservicesforallwomenandcallsforincreasingbudgetaryallocationsforsocialandhealth services for women.[13]

Montenegrohasratifiedthe***UNConventionontheRightsofPersonswith Disabilities***(CRPD).InaccordancewithArticle28oftheConvention,Montenegrohasa

[8]LawonGenderEquality.(OfficialGazetteofMontenegro46/07,73/10,40/11,35/15). Article14.

[9]Rajović, Miloš."TheRelationship betweenDomesticand InternationalLawAccordingtotheConstitutionof Montenegro". Faculty of Law, University of Belgrade. 2023. 46.

[10]CEDAWGeneralRecommendation19.Paragraph23.1992.

[11]BeijingDeclarationandPlatformforAction. 1995.

[12]MinistryofJustice,HumanandMinorityRights. "ReportonMontenegro's ImplementationofBeijing Declaration and Platform for Action 1995, and Sustainable Development Agenda (2030)". 2019. 8.

[13]BeijingDeclarationandPlatformforAction.1995.Paragraph110.Point1.1995.47.

responsibilitytotakeadequatemeasurestoprovidepeoplewithdisabilitieswithequalaccess to social services, including general social services and services for social protection.[14]

AsacandidatecountryforthemembershipintheEuropeanUnion,Montenegroshould also harmonise its national legal framework to the European acquis. Namely, a document of particularrelevancesuchasthe ***VictimsRightsDirective2012/29/EU*** whichrecognises victims of violence against women as a particularly vulnerable category, requires victim's access to specialised services, protective measures and to information in the relevant procedures.[15]Aswell,***Directive(EU)2024/1385*** isalsoofparticularrelevance.Besides introducingminimumrulesonthecriminalisationofspecificformsofviolenceagainstwomen, including certain forms of digital violence, it establishes a comprehensive framework for preventionofviolenceandthe protectionofvictims,aswellasvictim'saccesstojustice.The Directive requires Member States to ensure availability of accessible specialised support servicesthatcanrespondtospecificneedsofvictimsexperiencingdifferentformsofviolence againstwomen.Theseinclude:specialistsupportservices,shelters,24/7telephonehelplines, rape crisis and sexual referral centres, specialist counselling service, and service of the coordinated referral to other relevant support services.[16]

Montenegro has adopted the CoE***ConventiononPreventingandCombating Violence against Women and Domestic Violence*** (known as the Istanbul Convention - IC).[17]Itsmaingoalistoofferprotectionfromalltypesofviolenceagainstwomen,aswellas to prevent, protect, prosecute and eliminate domestic and violence against women. The IC obliges CoE member states to develop comprehensive frameworks, policies and protection measurestohelpwomenvictimsofgender-basedviolence;thisincludesofferinggeneraland specialisedservicestosupportvictims.[18]Additionally,theConventionrequiresmemberstates toallocateappropriatefinancialmeansandhumanresourcesfortheadequateimplementation of all policies and measures regarding all types of violence recognised by the IC.[19]

Inadditiontochildren'sprotectionfromviolenceguaranteedbythe***UNConvention ontheRightsoftheChild***, the IC identifies the need to protect and support children witnesses, while upholding the child's best interest.[20]

GREVIO,anindependentexpertbodymonitoringtheimplementationoftheIC,issues country reports on the current state of play regarding compliance with the IC. GREVIO has identifiedissuesthatrequireconsistentandcomprehensiveaction,callingforMontenegroto:

> ensure appropriate resources for the implementation of policies, measures and legislation aimed at preventing and combating violence against women, including those envisaged in the new NationalPlan, and sustainable funding forthe women's

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[14]UN.ConventionontheRightsofPersonswithDisabilities.2006.Article 28.

[15] Directive 2012/29/EU of the European Parliament and of the Council of 25 October 2012 on establishingminimumstandardsontherights,supportandprotectionofvictimsofcrime,andreplacing Council Framework Decision 2001/220/JHA.

[16] Directive (EU) 2024/1385 of the European Parliament and of the Council of 14 May 2024 on combating violence against women and domestic violence.

[17]ConstitutionofMontenegro.(Official GazetteofMontenegro,No. 1/2007and38/2013 –Amendments I-XVI). Article 9. Montenegro ratified the IC in 2013, but the ratification came into force in 2014. Accessed on 11 April 2025. Available at: https://www.coe.int/en/web/istanbul-convention/montenegro.

[18]CoE. TheConvention on PreventingandCombatingViolenceAgainstWomenandDomesticViolence.Article1, point v in relation to Articles 20 and 22. 2011.

[19]Ibid.Article8.

[20]CoE.ConventiononPreventingandCombatingViolenceAgainstWomenandDomesticViolence.2011.Article 26. Montenegro ratified this Convention in 2006. Available at: https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=116&Lang=en.

> rightsorganisationsthatrunspecialistsupportservicesforwomenvictimsofallforms of violence.[21]

While GREVIO's recommendations are not legally binding, they provide Montenegro with expert guidance toward compliance with the IC by highlighting effective results and good practices, as well as legal and policy shortcomings.

The ***UN Agenda 2030, SDG*** No. 5 focuses on achieving gender equality and empoweringall women andgirls by the endof 2030. Although theAgenda constitutes a soft law legal document, it still provides international pressure and creates strong incentives for Montenegrotoalign its national legal framework,strategies andpolicies withtheUNAgenda 2030, particularly SDG 5, which includes institutionalising GRB.[22] To comply with the UN Agenda 2030, in 2016Montenegro adopteda National Strategy on Sustainable Development until2030.[23]Itservesasanon-bindingguidelineforMontenegrotoalignitsnationallegislation and policies with international standards regarding sustainable development.

However, Montenegro still has not aligned its national legal framework with the IC, CEDAWandotherrelevantinternationalstandardsdealingwithgenderequality.Toconclude, Montenegro must fulfil the aforementioned international obligations. Relevant to budgeting for specialised services foreseen in the IC, Montenegro must comply with the IC and follow GREVIO's guidelines requiring GRB in providing specialised services for victims of gender-based violence.

NationalLegalFrameworkofMontenegro

LawonGenderEqualityofMontenegro

Adoptedin 2007, itrequires gender mainstreamingin all relevantphases of decision-makingand policymakingandestablishes alegal basis for introducingGRBintothedomestic legalsystem.[24]Moreover,theLawregulatesgeneralandspecificmeasuresaimedatachieving gender equality, including positive measures that can be undertaken in areas such as health or social protection.[25] Regarding GRB, the Law prescribes that all relevant

> statebodies,publicadministrationauthorities,andlocalself-governmentunits,public institutions and enterprises, and other legal entities exercising public authority, accompanied with business entities and other legal persons and entrepreneurs, are obliged to assess and evaluate the impact of their decisions and activities on the position of women and men, at all stages of planning, decision-making, and implementation, with the overall aim of achieving gender equality.[26]

However, Montenegro's public policies are still not sufficiently gender mainstreamed.[27] The LawisnotfullyalignedwiththeEuropeanUnion(EU)acquisandrelevantinternational

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[21]GREVIO. "Buildingtrust bydeliveringsupport, protectionandjustice:Montenegrofirstthematicreport".2024. 5.

[22]UN.DepartmentofEconomicandSocialAffairs,SustainableDevelopment. "Achieve gender equalityand empower all women and girls".

[23]GovernmentofMontenegro.Montenegro'sNationalStrategyonSustainableDevelopmentby2030.2012.

[24]Damjanović,MinjaandXhani, Blerina. "Stateofplayofgender-responsivebudgetinginMontenegro:overview of key achievements, gaps and ways forward"." UN Women Europe and Central Asia. 2024. 13.

[25]LawonGender Equality.(Official GazetteofMontenegro,No. 046/07from31 July2007,073/10 from10 December 2010, 040/11 from 8 August 2011 and 035/15 from 7 July 2015). Article 17. Paragraph 1.

[26]Ibid.Article3.

[27] GovernmentofMontenegro. Ministry ofHumanandMinorityRights(MHMR). "National StrategyonGender Equality 2021-2025 with its accompanying Action plan for 2025". 3.

standards, as it shouldclearly define policy measures towards improvinggender equality, as well as require gender analyses in different sectors.[28]

TheLawonSocialandChild Protection

Adopted in 2013, it regulates child and social protection (CSP), including social and othersupportandservices.[29]ThisLawforeseesthatinadditiontotheCentreforSocialWork (CSW)as apublicinstitution,providers of childandsocial services canincludeorganisations, entrepreneurs,business entities or individuals.[30]Thecompetent administrativeauthority,the MinistryofSocialWelfare,FamilyCare,andDemography(MSWFD), supervisestheLaw's implementation and the professional work of service providers.[31] The Law states that funds forbasicmaterialaidandCSPservicesshouldbeallocatedfromthestate'sbudget;itforesees thatbothstateandmunicipalbudgetsshouldallocatefundsforimplementingCSWservices.[32] The Law has a significant shortcoming: regulations and services are the same forall users and do not recognise the specific needs of women and children experiencing gender-based violence.[33] Montenegro lacks child, family and victim support services, and rape crisis and sexual violence referral centres are still not in place, including for children victims of violence.[34]

In Montenegro, social service workers are not trained specially for handling cases or victims of gender-based violence. Social service workers within CSWs are providing social servicestoallcategoriesofbeneficiariesrecognisedbytheLawonSocialandChildProtection. Youthandgrownindividualswhoarevictimsofneglect,abuse,exploitation,domesticviolence or who are at risk of becoming a victim: have special protection under this Law.[35] As provisioned by the Law, the state offers social services of social and child protection, as well asservicesofprovidingbasicmaterialbenefitsforbeneficiaries.[36]Thebasicmaterialbenefits whichthestatecanprovide,andarerelevantinthespecificcontextofviolenceagainstwomen or domestic violence are: allowances for care and assistance, healthcare and one-time financial assistance. Finally, the state provides the following services of social and child protection, in accordance with the relevant Law: counselling, therapeutic and socio-educational services, accommodation (shelters and reception centres), emergency interventions and other services.

Montenegro relies on social services offered by WCSOs, mostly funded by donors.[37] However,thepricingofspecialisedsupportserviceshasyetnotbeendefined.Thisrelatesto donorsprovidingmostfunding.TheGovernment'splannedactivitiesfor2025includeddrafting a proposal for a new Law on Social and Child Protection, as well as determining the cost of CSP services financed at the national level.[38]

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[28]EuropeanCommission(EC).Montenegro2024progressreport.2024.39.

[29]LawonSocialandChildProtectionofMontenegro. ("OfficialGazette, MNE", No.27/2013,1/2015,42/2015, 47/2015, 56/2016, 66/2016, 1/2017, 31/2017 - decision: US, 42/2017 and 50/2017). Article 1.

[30]Ibid.Article13in relationtoArticle19oftheLaw.

[31]Ibid.Articles162and163.Paragraph1.

[32]Ibid.Article 154.Paragraph1and 2.

[33]WRC."Theexistingservicesregardingthe rehabilitationandreintegrationof women experiencingviolencein Montenegro." 2020. 7.

[34]EC.MontenegroReport2024.40-74.

[35]LawonSocialandChildProtectionof Montenegro.(Official Gazetteof Montenegro"No.27/2013,1/2015, 42/2015, 47/2015, 56/2016, 66/2016, 1/2017, 31/2017 - and decision CC: 42/2017 and 50/2017) Article 4.

[36]Ibid.Article11.

[37]Thepricesofserviceshavenotyet beendefined, whichrelatesto donorsprovidingmostfunding.

[38]GovernmentofMontenegro.MontenegroProgramonEconomicReforms2023-2025.2023.219.

LawontheProtectionfromDomesticViolence

Adoptedin2010,thisLawguaranteesvictimsofdomesticviolencetherighttopsycho-social support and legal aid,[39] as well as healthcare and social protection (including material and non-material aid, accommodation and social services under the Law on Child and Social Protection).[40] Services prescribedin this Lawareguaranteedfor victims of domesticviolence in general withoutanyspecial reference to women experiencingdomestic violence as aform of gender-based violence. The institutions responsible for implementing this Law are state bodies offering comprehensive and adequate protection to victims, which include the police, misdemeanour authorities, the State Prosecutor's Office, CSWs, healthcare institutions and otherrelevantinstitutionsprovidingprotectiontovictimsofdomesticvioleinMontenegro.
WCSOs as well as other legal or individual entities also can provide protection in accordance with the Law.[41] The Law states that it relates to any material and nonmaterial services and legal aidbut does not state explicitly whichinstitution has responsibilitiesforfinancingthese services.

LawonFreeLegalAid

Adopted in 2011, this Law secures the right to a fair trial by guaranteeing free legal aid to individuals with poor financial means, all victims of criminal offenses of domestic violenceandhumantraffickingaswellasbeneficiariesofCSPservices.[42]Amendmentstothis Law,adopted in2024,[43]expanded thecategories of beneficiaries,includingvictims of crimes against sexual freedom (sexual violence) and torture. In Montenegro, legal aid is a state owned service, which is not specialised for women victims of gender-based violence. The budget for free legal aid is planned by the Judicial Council of Montenegro, including for all courts in Montenegro and their offices for free legal aid. Budget allocations for free legal aid are not made in line with GRB principles, such as using gender analysis of prior expenses to project future costs; they do not recognise the diverse needs of women and girls, such as socio-economicchallenges.[44]Itisalsonotpossibletodeterminefromannualreportspublished bytheJudicialCouncilhowmanywomenhavereceivedthistypeof assistance,asthedatais notdisaggregatedbysex.[45]Further,reportsdonotprovideinformationonbudgetallocations according to the grounds for exercising the right to free legal aid, making it impossible to determinehowmuchfundingwasallocatedfordomesticviolenceproceedings,sexualviolence cases or other categories of beneficiaries.

Montenegrostilllacksgenderresponsivelegalaidandsensitisedlegalprofessionalsto facilitatewomenvictimsofviolence'saccesstojustice,remediesandrelevantprocedures.As there is no obligatory education or trainingfor legal professionals on gender-basedviolence, most are not sensitised enough to handle such cases with necessary levels of empathy, professionalism andconfidentiality. Further,legal professionals are appointedin every single casefromthebarassociation'spubliclist.Thisleadstothesituationwhereonewomanvictim ofviolencemayhavemultiplelegalrepresentativesinseverallegalmattersrelatedtoher

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[39] TheLawonProtectionfromDomesticViolenceofMontenegro."OfficialGazette,Montenegro, No.46/2010". Article 4.
[40]Ibid.Article12.

[41]Ibid.Article6.Paragraph1.

[42] The LawontheFree Legal AidofMontenegro."Official GazetteMNE, No.20/2011".Article13.Paragraph1, point 4.

[43]Amendments totheLawonFreeLegalAidofMontenegro. No.011/24-1971/2-01.2024. Availableat: https://www.sluzbenilist.me/propisi/375969.

[44]UNWomen."Whatisgender-responsivebudgeting?".2024.

[45]JudicialCouncil ofMontenegro.AnnualReportonthe workoftheJudicial Council andoverall stateofjudiciary for 2024. 2025. Available at: https://sudovi.me/static//sdsv/doc/IZVJESTAJ_O_RADU_2024.pdf.

access to justice, violence based on gender or domestic violence. Legal professionals and lawyers are appointed randomly for each reported case that fulfils conditions for providing free legal aid. This does not involve any previous analysis of the circumstances of the case, such as the need to appoint a legal representative with certain qualifications to handle the caseeffectively.Thiscouldpotentiallyleadtoretraumatization,wherethevictimmustexplain her case to the relevant legal professionals over and over again.

The aforementioned amendments to the Law, which expanded the right to free legal aid and enabled the provision of legal aid in related proceedings, may contribute to overcoming some of the previously identified shortcomings, particularly if they ensure continuity of representation by the same lawyer in multiple related proceedings. However, it remains to be seen how consistently these provisions will be implemented in practice.

The Law still does not recognise or financially support legal services provided by specialised WCSOs, including strategic legal representation for women victims of gender-basedviolence. Consequently, these organisationscontinue to rely predominantly on foreign donor funding to provide such services.

LawontheHealthProtectionofMontenegro

Under the Law on the Health Protection in Montenegro, "all citizens are equal when exercisingrighttohealthcare,regardlessoftheirnationality,race,sex,age,language,religion, education, social origin, financial status or any other personal characteristic"[46]. Health protection is guaranteed for Montenegrin citizens on all levels of health protection: primary, secondaryandtertiarylevel.Further,providers of thehealthcareservices in Montenegrocan be state organs, local municipality units, domestic or foreign legal entities and individuals.[47] As for foreigners residinginMontenegro,healthprotection is providedtoindividuals whoare refugees and all persons who have been granted temporary protection in Montenegro. Also, health workers are obliged to provide emergency healthcare services to all foreigners in Montenegro.[48] In addition, foreigners who obtained permanent or temporary residence permitsinMontenegrocanenjoyhealthinsurance(thereforehealthprotection)inMontenegro if they fulfil certain conditions: are employed; unemployed persons registered with the Employment Agency of Montenegro who receive financial compensation in accordance with the law governingemployment; recipients of pensions under the regulations on pension and disability insurance and so forth.[49] Yet, none of these laws addresses the needs of women victims of gender-based violence, nor special healthcare services to be provided for these women.

Whenitcomestofunding,theLawontheHealthProtectionofMontenegrostatesthat astateprovidesfundsfromitsbudgettospecificcategoriesofhealthcareprotection,including funds for providing healthcare and protection to victims of domestic violence.[50] The Law is generally gender-sensitive and its provisions are directed towards both men and women. Therefore, women victims of gender-based violence, who legally fulfill general conditions enjoygeneralandfreeaccesstohealthcareservicesinMontenegro.Yet,in2021,theStrategy observed that not all Roma and Egyptians (including Roma and Egyptian women victims of gender-based violence) enjoy health insurance and free access to health services under the

[46] LawontheHealthProtectionofMontenegro. ("Official GazetteofMontenegro", No.39/04from09/04/2004, and "Official Gazette of Montenegro", No. 14/10 from 17/03/2010, 40/11 from 08/08/2011). Article 4.

[47]Ibid.Article50inrelationwitharticles51 and52.

[48]Ibid.Article31.

[49]Lawonmandatory healthinsuranceof Montenegro.("OfficialGazetteofMontenegro."No.6/2016,2/2017, 22/2017, 13/2018 and 67/2019). Article 6.

[50]LawontheHealthcare ProtectionofMontenegro.("OfficialGazette Montenegro",No.3/2016,39/2016, 2/2017, 44/2018, 24/2019 - other laws: 82/2020 and 8/2021). Article 17.

sameconditions.[51]In2025,theimplementationreportfoundthatmanyRomaandEgyptians donotenjoyaccessiblehealthcareservices,whichisadirectconsequenceoftheirunregulated civil status and lack of adequate identification documentation.[52]

Sexual and reproductive health services, including testing and treatment for sexually transmitted diseases and laboratory diagnostics are available for all citizens of Montenegro who fulfil conditions to have state health insurance.[53] In addition to this, women victims of violence who qualify for the state guaranteed health services also can seek sexual and reproductive health services from state appointed gynaecologists working on the primary, secondary and tertiary levels of health protection. However, Roma and Egyptians (including Roma and Egyptian women victims of gender-based violence) do not enjoy health insurance and free access to these health services under the same conditions.[54]

LawonBudgetandFiscalPolicy

In 2014, this Law introduced medium-term budget planning.[55] This was a first step towards creating favourable conditions for introducing GRB in legislation dealing with fiscal policy.In2020,MFissuedtheGuidelineonthepreparationandassessmentofimpactanalyses of decisions and other regulations of local governments, a step toward GRB.[56]

Meanwhile,thebudgetisplannedusingprogramme-basedbudgeting,whichismainly result-oriented and based on outputs, facilitatingGRB.[57] By integrating a gender perspective intoprogrammebudgeting,policymakerscanassesstheintendedimpactofplannedactivities basedonexpectedoutcomesandlinkbudgetallocationstogenderequalityobjectives.[58]GRB also can support monitoring and evaluation results, and it is an essential part of the entire budget cycle including planning, allocation, execution and auditing process. Implementation of GRB in all phases of the budget cycle remains critical for adequate budgeting for all specialised services related to addressing gender-based violence.

However, the 2024 version of the Law only partially addressed GRB requirements. Experts have observed that, "there are still gaps in the legislative framework that make the implementationofgendermainstreaminginpolicyandbudgetanoptionalactivity,ratherthan amandatoryrequirement."[59]AlthoughMontenegrohasadoptedInstructionsfortheMedium-term Budget Framework (MTBF), including guidelines regarding GRB, gender budget statements and introducing gender indicators in the public finance system, Montenegro consistentlyfailstoregulatethesematters.[60]DespiterecommendationstowardadoptingGRB,

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[51]GovernmentofMontenegro. Ministry of Justice,HumanandMinorityRights.StrategyonSocial Inclusionof Roma and Egyptian Population 2021-2025". 57-58.

[52]MinistryofJustice,HumanandMinorityRights ofMontenegro."ThereportontheRealizationof the2024 Action Plan within the Strategy on Social Inclusion of Roma and Egyptian Population 2021-2025". 13.

[53] LawontheHealthProtectionofMontenegro.("Official GazetteofMontenegro", No.39/04 from 09/04/2004, and "Official Gazette of Montenegro", No. 14/10 from 17/03/2010, 40/11 from 08/08/2011). Article 4.

[54]GovernmentofMontenegro. Ministry ofJustice,HumanandMinorityRights. "StrategyonSocial Inclusionof Roma and Egyptian Population 2021-2025". 57-58.

[55]LawonBudgetandFiscalPolicyofMontenegro.2014.

[56]Guideline on the preparationandassessmentofimpactanalysesofdecisions andotherregulationsoflocal governments. "Official Gazette Montenegro, No. 105/20 - 29/10/2020". 2020.

[57]GovernmentofMontenegro. TheSecretariatoftheCompetitivenessCouncil."Gender-responsive budgetingin Montenegro: 2020-2023". 2024.

[58]"Ibid.

[59]Damjanović,MinjaandXhani, Blerina. "Stateofplayofgender-responsivebudgetinginMontenegro:overview of key achievements, gaps and ways forward". UN Women Europe and Central Asia. 14. 2024.

[60]CenterforResearchandPolicyMaking,GenderBudget WatchdogNetworkandSida."DeliveringonSDG 5.1.C.inWesternBalkansandRepublicofMoldova". 4. 2021.

thenew2025LawonBudget andFiscalpolicydidnotfullyinstitutionaliseGRBinthebudget process.[61]

GRBinStrategiesandActionPlansAddressingViolence againstWomen and Domestic Violence

This section examines the gender-responsiveness and implementation of GRB in strategies and action plans providing for specialised services for addressing gender-based violence.

MontenegroReformAgendafor2024-2027

Related to the EU Accession process, Reform Measure 4.4.1 in this Agenda requires Montenegro to fulfil its obligations under the IC and to address GREVIO's recommendations toestablishthreecrisiscentresforvictimsofsexualviolence,inaccordancewithICstandards: integrated health, legal and psychological victim support.[62] This Measure should be implementedby theend of December 2025.[63]The Agendastates that a state shouldprovide sheltersforvictimsofviolenceagainstwomen thatwillsupportvictimswhoexperienced"the most extreme manifestations of gender inequality in Montenegro". These shelters should be accessibleinaccordancewiththeUNCRPD.[64]Additionally,theAgendaenvisagesestablishing at least three CSP services in all municipalities. Measures include securing land, construction or reconstruction of buildings thatcan be adapted for establishingshelters. The Agenda also states that victims in these rape crisis centres will receive protection under the One Stop principle: as a part of the service, victims shall be able to receive temporary accommodation for up to three days, counselling, a forensic examination and provide a single statement to thecompetentauthorities.This service is additionallyrecognisedbytheNational Planfor the implementation of the IC, which is Montenegro's main strategic document for protection against gender-based violence.[65] Lastly, the Agenda identifies the main possible obstacles to the reform process, including: lack of financial resources for reforms, delays in adopting strategiesandlawsduetochangesindecision-makingstructures,andinsufficientawareness and capacities for providing family and community services.

Table2.MontenegroReformAgendafor2024-2027

Criteria	Finding
Strategy/actionplanclearlystatebudgetforallactivities	No
Budgetedamountsaresufficientforrealisingactivities	NA
Theinstitutionresponsibleforthebudgetis clear	Yes
Sufficientstateresourcesareallocated(withoutdonor dependency)	NA
Thebudgetisfullyallocated(secured)	NA
Theallocatedbudgetisspentasplanned	TBC

The Agenda clearlystatesinstitutions responsible for the reform activities, with MSWFD being tasked to ensure the implementation of the Measure 4.4.1 – to ensurethataunique databaseonDomesticviolenceincludes"atleast95%ofdomesticviolencecasesreportedto the police or social welfare officers"[66]; as well as, to ensure the establishment three crisis centres for victims of sexual violence by the end of 2025.The Reform Agenda states clear budgetsforpriorityareaconcerningFundamentalRightsandRuleofLaw,inthetotalamount

[61]Damjanović,MinjaandXhani, Blerina. "Stateofplayofgender-responsivebudgetinginMontenegro:overview of key achievements, gaps and ways forward"." UN Women Europe and Central Asia. 31-33. 2024.

[62]MinistryofEuropeanAffairsofMontenegro. "ReformAgendaofMontenegro 2024-2027:Theinstrumentfor EU growth and development". 2024,192.

[63]Ibid.192.

[64]Ibid.17.

[65]Ibid.159.

[66]MinistryofEuropeanAffairs.MontenegroReformAgenda2024-2027:ReformandGrowthFacility.2024. 109.

of €96,742,498.85.[67] Moreover, a specific Measure4.4.1. under this policy goal envisages an amountof €2.317.185,60for decreasingthelevelof violenceagainstwomen in Montenegro.

Action PlanforMeeting the Closing Benchmarks inNegotiationChapter23– JudiciaryandFundamentalRights

In April 2025, the Government of Montenegro adopted this AP. Request 3.4. calls for establishing a clear, credible track record on implementing provisions aimed at fighting discrimination,achievinggenderequalityandcounteractinggender-basedviolence.Activity 3.4.6. aims at improving protection of victims of sexual violence by establishing three crisis centres for women experiencingsexual violence in accordance with IC requirements, as well as ensuring these centres are accessible for women with disabilities.[68] MSWFD should undertakethis activity.The statedsourceof financingis thestate's budget,in the amountof €2.2million.PartofthesefundswasenvisagedwithintheEUGrowthPlanfortheWBforthe period2026-2027.[69]Thus,thisAPpartlyreliesonfutureEUfunding(2026-2027)toimplement support services, which can result in delays or uncertainty regarding the start and implementation of the activity.

Table 3. AP for Meeting the Closing Benchmarks in Negotiation Chapter 23 – Judiciary and Fundamental Rights

Criteria	Finding
APclearlystatesbudgetforall activities	Partially
Budgetedamountsaresufficientforrealisingactivities	TBC
Theinstitutionresponsibleforthebudgetis clear	Yes
Sufficientstateresourcesareallocated(withoutdonor dependency)	No
Thebudgetisfullyallocated(secured)	TBC
Theallocatedbudgetisspentasplanned	TBC

TheAPdoesnot clearly state the financial amount necessary for the implementation of all relevant activities. Rather, these activities are funded by both state and donor funds, dependingonthe activity. The AP gives precise information on the institutions responsible for its implementation. The AP states clear budget funds for the implementation of two crucial measures:Measure3.4.6.(improvingtheprotectionofvictimsexperiencingdomesticviolence – 100,000fundsoriginatingfromboththeBudgetofMontenegroandtheGrowthPlanforWB 2026-2027), Measure 3.4.7. (Improving the protection of victims of sexual violence by establishing3rapecrisis centresinlinewiththeIC,thatwouldbeaccessibletovictims living withdisabilities –2,200,00funds originatingboth fromthestate budgetand GrowthPlanfor WB 2026-2027). Implementation of foreseen budget allocations cannot yet be assessed as the activity is set to begin in 2026.

NationalGenderEqualityStrategy(2021-2025)andActionPlan(2021-2022)

Adoptedin2021,thisStrategyandAPisthefourthstrategicdocumentofMontenegro aimed at improving the policy framework regarding gender equality. This goal-oriented strategy focuses on elevating gender equality by 2025.[70] The Strategy calls for MF and the Ministry of Labour and Social Welfare (MLSW) to standardise procedures for gender mainstreaming public policy.[71]

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[67]Ibid.260-261.

[68]MinistryofEuropeanAffairs."ActionPlanforMeetingthe ClosingBenchmarksinNegotiationChapter23 – Judiciary and Fundamental Rights". 32.

[69]Ibid.32.

[70]GovernmentofMontenegro. MHMR. "NationalStrategyonGenderEquality2021-2025 withits accompanying Action plan for 2025". Operational Goal No. 1. 3.

[71]In2025,MSWFD. The MinistryofSocialWelfare andMFseparatedintoindependentministriesduringthe period between the first and second Action Plan.

TheStrategydoesnotclearlyspecifyallbudgetamounts.Forsomeamounts,itstates: "funds from regular state budget" and does not transparently estimate amounts. Both the Strategy and AP state which institutions and donors are responsible for implementing activities.Forexample, the AP clearly states that €12,000 (from the Organisation for Security and Co-operationinEuropeasa donor) are allocated for analysing all relevant policies and developing a methodology for gendermainstreaming public policies.[72] Yet, no funds were allocated for the activity to amend Regulatory Impact Assessment(RIA)Guidelinestoincludegenderimpactanalysisandfurtheranalysisofreports and guidelines related to gender mainstreaming.[73]

Table4.NationalGenderEqualityStrategy(2021-2025)andAP (2021-2022)

Criteria	Finding
Strategy/APclearlystatebudgetforallactivities	Sometimes
Budgetedamountsaresufficientforrealisingactivities	No
Theinstitutionresponsibleforthebudgetis clear	Yes
Sufficientstateresourcesareallocated(withoutdonor dependency)	No
Thebudgetisfullyallocated(secured)	Partially
Theallocatedbudgetisspentasplanned	No

Additionally, Measure 1.6 calls for introducing GRB in the public finance system.[74] MSWFDistheleadinstitutionandactivityimplementer.However,nofundswereallocatedfor activities, including preparation of guidelines on how budget users should conduct gender analysisofrelevantprogramsandcompleteagender-responsivebudgetcircular,orguidelines forGRBinrelationtofinalaccounts.[75]MFonlydevelopedrelevantguidelines,suggestingthat this activity was only partially fulfilled in 2023.[76]

TheAPhasallocatedfundsforadvisoryandlegalaidtowomenexperiencingeconomic violence, assisted by WCSOs providing support and services to victims of domestic violence. Forthisactivity,theMinistryallocated€20,000fromtheStateBudget.[77]AsaresultofMeasure 3.4.3, MLSW[78] spent€440,000for WCSOs supporting victims of violenceagainstwomen and domestic violence; €200,000 for shelters for victims of domestic violence; and €100,000 following a public call.[79] Finally, €146,285 was spent based on a decision of the CSW.

The 2023-2024 AP envisaged realising almost all partially and non-implemented activitiesin2021-2022.[80]WRC'smonitoringreportfoundthatthemostsignificantprogressof thefirsttwo-yearAPwasintheareaofGRB,becausethelineministriesandinstitutionshave organised roundtables, workshops, rulebooks andtraining for directors, budget analysts and employeesofvariousinstitutions.Aswell,inco-operationwiththeCouncilforCompetitiveness andOrganisationforSecurityandCo-operationinEurope(OSCE),MFhaspresentedproposals foramendingtheLawontheBudgetandFiscalPolicyofMontenegro:GenderBudget

[72]GovernmentofMontenegro. MHMR. "NationalStrategyonGenderEquality2021-2025 withits accompanying Action plan for 2025". Measure 1.1. 82.

[73]Ibid. TheNationalGenderEqualityStrategyandAPImplementationreportfrom2023statedthatthisactivity was fulfilled bydevelopinga draftRIAguideline (incooperation withjoint EUandOrganisation for EconomicCo-operation and Development (OECD) initiative Support for Improvement in Governance and Management (SIGMA).

[74]Ibid.63-64.

[75]Ibid.85.

[76]MHMR. "Report:Implementationofthe ActionPlanofNational GenderEquality Strategy forthe period2021-2022". 2023. 27.

[77]Ibid. Measure3.4.3. 90.

[78] In2024,MLSWsplit into twoseparateministries, withMSWFD nowresponsible forviolence againstwomen issues.

[79]AllocatedtoNGOWomen's SafeHouseandSOSNK.

[80]Ibid.

Statement.[81] Overall, specific allocations targeting GRB related to violence against women seem insufficient to ensure meaningful introduction and implementation of GRB in the Montenegrinlegalandpolicysystem.TheECMontenegroreport2024statedthat"theMinistry of Human and Minority Rights mid-term evaluation of implementation of the 2021-2025 National Gender EqualityStrategyandits 2023-2024Action Plan showedastrongdownward trendof budgetallocations for gender equalityandthe marginalization of gender equalityon the political agenda."[82] Meanwhile, the Gender BudgetWatchdogNetwork hasobservedthat Montenegro has made some efforts to institutionalise GRB in its budget system.[83]

NationalStrategyforSustainableDevelopmentby2030

Adoptedin2016,thisisthemain,long-termstrategicdocumentinMontenegro,based ontheUNAgenda2030andSDGs,includingSDG5relatedtogenderequality.SDG5focuses on achieving gender equality and empowering all women and girls by the end of 2030. Although the Agenda constitutes a soft law legal document, it still provides international pressure and creates strong incentives for Montenegro to align its national legal framework, strategies and policies with the UN Agenda 2030, particularly SDG 5, which includes institutionalisingGRB.AlthoughMontenegro's Strategyfor SustainableDevelopmentby2030 envisagesresourcesforSDG5implementation,itdidnotdeterminetheallocationofresources forrealisinganySDG5goal,includingSDG5.1and5.c.1.Nevertheless,theStrategyidentified sixSDG5sub-indicatorsfor2018-2024whichincludeindicator5.1.c,focusedon"making public allocations for gender equality and women empowerment."The Ministry of Human and Minority Rights (MHMR) was appointed responsible for introducing these indicators by the end of 2024.[84] In 2022, Montenegro adopted the Second State National Report, focusing on progressinachieving6SDGs, includingSDG5.[85]Yet,thenationalindicatorthatcorrespondswithSDG5.c.1.isnotcurrently monitored, and it is not possible to determine implementation status due to lack of data.[86] The Strategy's accompanying fifteen-year AP includes Measure 2.1.2.6, which requires adopting laws and policies that concern gender equality and women's empowerment at all levelsofSDG5.[87]AlthoughtheStrategyenvisagesresourcesforSDG5implementation,itdid notdeterminetheallocationofresourcesforrealisinganySDG5goal,includingSDG5.1and

Table5.NationalStrategyforSustainableDevelopment by 2030

Criteria	Finding
Strategyclearlystatesbudgetforallactivities	No
Budgetedamountsaresufficientforrealisingactivities	No
Theinstitutionresponsibleforthebudgetis clear	Yes
Sufficientstateresourcesareallocated(withoutdonor dependency)	No
Thebudgetisfullyallocated(secured)	No
Theallocatedbudgetisspentasplanned	No

[81] Stjepčević,Anita, andKordić, Izabela. WRC."Monitoringreportonimplementationof2023Actionplanfor National Strategy for Gender Equality 2021-2025". 2024. 15.

[82]EC.Montenegro2024progressreport.2024.39.

[83]CenterforResearchandPolicyMaking. GenderBudget WatchdogNetwork. "DeliveringonSDG5.C.1.inthe Western Balkans and Republic of Moldova". 2021. 6.

[84] MinistryofSustainableDevelopmentandTourism. "NationalStrategyforSustainableDevelopmentby2030". 2016. 362.

[85]GovernmentofMontenegro."SecondVoluntaryNationalReport:MontenegroandSustainableDevelopment Goals 2016-2021".2022.Montenegro presenteditsSecondVoluntary NationalReportontheprogressregarding SDGs 1,4, 5, 14, 15 in July 2022. This report reflects on the implementation of the National Sustainable Development Strategy for 2016-2021.

[86]Ibid.65.

[87] MinistryofSustainableDevelopmentandTourism. "NationalStrategyforSustainableDevelopmentby2030". 2016. 285.

indicator 5.c.1 on GRB.[88] Nevertheless, the Strategy did identify six SDG 5 sub-indicators for 2018-2024,[89] which include indicator 5.c.1., focused on "making public allocations for gender equality and women empowerment."[90] The monitoring system is still being developed by UN Women and MHMR as the competent authority. Yet, Montenegro remains the only country in the region that did not include GRB in its budget circular, due to a lack of political will.[91]

National Plan for the Implementation of IC for the period 2023-2027

After three years without any policy document on violence against women, following GREVIO's suggestion to put in place a long-term and coordinated strategy, in 2023 Montenegro adopted this National Plan.[92] It was established as a result of the National Strategy for Sustainable Development 2030,[93] and as a legal continuum to the previous National Strategy for Protection from Domestic Violence (2017-2021). It aims to accomplish goals set by the IC, including "drafting a comprehensive framework, policies, and measures of protection for all victims experiencing violence against women, as well as domestic violence by the end of 2027".[94] The National Plan has precise amounts and percentages of funds allocated from the state budget regarding specialised services for women victims of violence. Responsible implementers are MLSW, MF and WCSOs.

Table 6. National Plan for the Implementation of IC for the period 2023-2027

Criteria	Finding
Plan clearly states budget for all activities	No
Budgeted amounts are sufficient for realising activities	No
The institution responsible for the budget is clear	Yes
Sufficient state resources are allocated (without donor dependency)	No
The budget is fully allocated (secured)	No
The allocated budget is spent as planned	No

Operational Goal 2 is tasked with achieving a "Holistic answer to violence against women in Montenegro". Operational Goal 1 addresses Roma, Egyptian and rural women's access to specialised services. Measure 2.3. of Operational Goal 2 aims to ensure sustainable funding for women's non-governmental organisations (NGOs) that provide specialised support services for women who are victims of all forms of violence. The Plan states that this activity will be implemented by MLSW and allocates €1,000,000.[95] Further, the Plan allocates €1,000,000 for securing sustainable financing for WCSO providers of specialised services supporting women victims of all types of violence.[96] The financial means in the Plan are the state and donors, depending on the measure/activity. The allocated amount is stated as "regular budget funds"; no clear information exists for specific budget lines of planned funds.

[88] Ibid. 437.

[89] Ibid. 362.

[90] UN Women. Sustainable Development Goal Indicator 5C1. Accessed on 20 April 2025. Available at: https://gender-financing.unwomen.org/en/highlights/sustainable-development-goal-indicator-5c1.

[91] Risteska, Marija, and Striković, Slavica WNGO Women Action. "Report on the 5.c.1. SDG Indicator: Proportion of countries with systems to track and make public allocations for gender equality and women's empowerment – Montenegro". 2020. 19-20.

[92] GREVIO. "Building trust by delivering support, protection and justice - Montenegro, first thematic evaluation report". GREVIO (2024)10. 2024. 11.

[93] Government of Montenegro. MSWFD. "Report on the Implementation of the National Action Plan for the Implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention) for the Period 2023–2024". 6.

[94] "National Plan for the Implementation of the CoE Convention on Preventing and Combating Violence Against Women and Domestic Violence (Istanbul Convention), for the Period 2023–2027". Montenegro. 2023. 22.

[95] Ibid. 22.

[96] Ibid. 25.

This measure has been partially realised. MSWFD (acquiring responsibilities from MLSW) secured €150,000 for victims in shelters in 2023 and €300,000 for 2024.[97] The new amountforsustainablefundingofWCSOsprovidingspecialisedservices forwomenvictimsof violence was €965,000, implementedby MF, MSWFD andthe specifiedWCSOs by the fourth quarter of 2027. Measure 4.3., ensuring victims of violence against women have access to servicesforrehabilitationandreintegrationalsohasbeenpartiallyimplemented,buttheexact fundsspenthavenotbeenstatedinthereport.[98]Measure4.5,"securingtheadequatenumber of shelters to women and children victims of violence"[99]was successfully implemented. The Ministry licensed two more services and opened a shelter for victims of sexual exploitation with three accommodation units. However, it has not reported the amount spent.[100]

Measure4.8foreseesestablishingrapecrisiscentresandservicesforvictimsofsexual violence that would offer forensic and medical support to women experiencing violence, as wellastraumasupportandcounselling;itenvisagesdonationsintheamountof€150,000for implementation.[101]Thereportstatedthatthestartdatefor themeasureimplementationwas the fourth quarter of 2024 and that this measure should be implemented by the end of the fourthquarterof2027.AsofthetimewhentheReportontheimplementationoftheNational Planwasissued,themeasurestartdatewasnotrealised.Donationswerestatedasthemain source of funding for this measure's realisation in the future.[102]

GREVIO noted the lack of state funds committed to the previous strategy and the state'sstrongdependencyoninternationaldonorstofundplannedactivities.[103]Moreover,the amountplannedseemslowforestablishingthreesuchservices(rapecentres)by2027.Many measures are foreseen to be funded by donors, which can risk implementation of these measures.[104] GREVIO also has raised concern that some measures are costly but not funded andthat"theoverallcostingmaybetoolowinsomecasestoachievethedefinedtargets."[105] Moreover, concrete budget lines need clarification, including their source of funding.[106] Regarding implementation, the report for 2023/2024 states that Measure 4.8. was not realised: A working group was formed to develop a Strategy for the Protection of Victims' Rights. MSWFD licensed 25 service providers for victims of violence against women and domestic violence.

StrategyfortheDevelopment of theSocial and Child ProtectionSystem for the period from 2025 to 2028 and Action Plan for 2025

As requested in October 2024 by the EC report on Montenegro, the Government adoptedthisfourthstrategicdocumentonthedevelopmentoftheCSPsystemandanAPfor 2025.[107] Its strategic goal is to "establish and develop an integrative and sustainable system ofsocialand child protectionby guaranteeing improvementsinthe quality ofbeneficiaries'

[97]MSWFD. "Report on the realisation of the National Plan for the Implementation of IC for the period 2023-2024."2024.14-15.Only€200,000was spentwith anadditional€300,000 securedbasedon aprioranalysisof needs and costs across the Ministry's specific sectors.

[98]Ibid.43-44.

[99]Ibid.46-48.

[100]Ibid.46-48.

[101]Ibid.40.

[102]Ibid.50.

[103]GREVIO. "Buildingtrust bydeliveringsupport, protectionandjustice:Montenegrofirstthematicreport." 2024. 13.

[104]Ibid.14.

[105]Ibid.12.

[106]Ibid.13.

[107]GovernmentofMontenegro, MSWFD. "Strategy forthe DevelopmentofSocialandChildProtectionforthe period 2025-2028, with accompanying Action Plan for 2025". 2024. 22.

lives."[108] The Strategy states that there was a consistent increase in allocations for CSP services in all local governments during the period of 2020-2022.[109] For example, in 2020, local governments allocated around €3.5 million in total for CSP services, compared to approximately €4.5 million allocated in 2022. The financial framework of the 2025 Strategy and AP partially states the exact amounts needed for realising Operational Goal 2 (improving social and child protection services by increasing the number of beneficiaries with access to services); funds are to be allocated from both the state budget (€2,306,400) and donors (€1,000,000).[110] MSWFD has the responsibility of coordinating implementation of both activities and the budget.[111] Additionally, representatives of ministries and other relevant state bodies included in the Strategy working group are responsible for monitoring the Strategy's implementation.[112] The first evaluation of the Strategy and AP's implementation is expected to be presented by the end of 2026 as a mid-term report.[113]

Table 7. Strategy for the Development of the Social and Child Protection System

Criteria	Finding
Strategy/AP clearly states budget for all activities	Partially
Budgeted amounts are sufficient for realising activities	No
The institution responsible for the budget is clear	Yes
Sufficient state resources are allocated (without donor dependency)	No
The budget is fully allocated (secured)	TBC
The allocated budget is spent as planned	TBC

A SWOT (Strengths, Weaknesses, opportunities and Threats) analysis of the current state of play in CSP found that underdeveloped CSP services, undefined service prices, unclear division of financial responsibilities between local and central levels of governance and a lack of financial resources to support sustainable development of services present threats to advancing the CSP system in Montenegro.[114] The EC progress report for Montenegro (2024) concluded that Montenegro's CSP policy is outdated, and expected reforms are challenged by planning and budgeting process.[115]

Strategy on Roma and Egyptian Inclusion in Montenegro for 2021-2025

Operational Goal 10 of this Strategy calls for the establishment of specialised services for temporary daytime shelter for Roma and Egyptian children victims of forced marriages and begging. The Strategy's AP allocated €10,000 from the municipal budget of the Capital City of Podgorica for this.[116] However, this Strategy did not deal with specialised services or support to Roma and Egyptian women experiencing violence. The Report on the realisation of the Strategy, published in 2025, concluded that the number of specialised daytime shelters has grown from one in 2021 to three in 2025.[117]

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[108] Ibid. 22.

[109] Ibid. 25.

[110] Ibid. 11-13, 72-73.

[111] Ibid. 72.

[112] This includes representatives from MSWFD; Ministry of Health; Ministry of Human and Minority Rights; Ministry of Labour; Institute for Child and Social Protection; and the Directorate for Inspection Affairs and the Association of Municipalities of Montenegro.

[113] Ibid. 74.

[114] Ibid. 36-37.

[115] EC Progress report for Montenegro. 2024.

[116] Government of Montenegro. MHMR. "Strategy on Social Inclusion of Roma and Egyptian Population 2021-2025". 127.

[117] MHMR. "The report on the Realization of the 2024 Action Plan within the Strategy on Social Inclusion of Roma and Egyptian Population 2021-2025". 13.

The Strategy identifiedthemainsources offundingasdonors,state budget and resources allocated from the EU Instrument for Pre-Accession (IPA) funds.[118] Yet, it does not clearly state a budget for all activities,andthebudget allocatedis shownas atotal amountfor thestate budget, IPA andother donor funds.[119]The responsibility for monitoring the Strategy has been divided between line ministries and the Strategyworkinggroup(constitutedbythemembersofallrelevantministries).[120]Oneactivity in the new AP envisages developing a new strategy on improving the position of Roma and Egyptians in Montenegrobydraftinganew strategyon RomaandEgyptian population social inclusion 2026-2030.[121]

Table8.StrategyonRomaandEgyptianInclusionin Montenegro 2021-2025

Criteria	Finding
Strategy/APclearlystatebudgetforallactivities	No
Budgetedamountsaresufficientforrealisingactivities	No
Theinstitutionresponsibleforthebudgetis clear	Yes
Sufficientstateresourcesareallocated(withoutdonor dependency)	No
Thebudgetisfullyallocated(secured)	Partially
Theallocatedbudgetisspentasplanned	No

The realisation report for the National Plan for the implementation of the IC stated that a measure regarding increasing access to specialised services for marginalised women, includingRomaandEgyptianwomen,hasbeensuccessfullyimplemented.[122]Althoughwomen victims of violence enjoy general and free access to healthcare services in Montenegro, in 2021, the Strategy observed that not all Roma and Egyptians (including Roma and Egyptian women victims of gender-based violence) enjoy health insurance and free access to health services under thesameconditions.[123] In 2025, the realisation reportfoundthatmanyRoma and Egyptians do not enjoy accessible healthcare services, which is a direct consequence of their unregulated civil status and lack of adequate identification documentation.[124]

StrategyfortheProtectionof Persons with Disabilities from Discriminationand PromotionofEquality2022-2027

This Strategy is the second strategic document with a goal to guarantee the equal positionandrightsofpersonswithdisabilities.[125]AnoveltyofthenewStrategyisitsfocuson the status of women and girls with disabilities.[126] This Strategy recognises social policy as essential for empowering women and girls with disabilities.[127] Women with disabilities experiencing sexual violence or rape face double discrimination due to the lack of referral centresofferinggynaecologicalservicesandunequalaccesstoreproductivehealthcare

[118]GovernmentofMontenegro. MHMR. "StrategyonSocial Inclusion ofRomaand EgyptianPopulation2021-2025". 82.

[119]Ibid.82.

[120]Ibid.80.

[121]Ministryof EuropeanAffairs."ActionPlan forMeeting the Closing Benchmarksin NegotiationChapter23 – Judiciary and Fundamental Rights". 34.

[122]MSWFD."ReportontheRealisationoftheNationalPlan forthe ImplementationofICfor the period2023-2024". 2024. 8-10.

[123]GovernmentofMontenegro. MHMR. "StrategyonSocial InclusionofRomaandEgyptianPopulation2021-2025". 57-58.

[124]MHMR. "ThereportontheRealisationofthe2024Action Plan withintheStrategyonSocial Inclusionof Roma and Egyptian Population 2021-2025". 13.

[125]Reportedly,morethan91%ofpersonswithdisabilitiesfaceddiscriminationwhileaccessingsocialservicesin 2022.(MinistryofEuropeanAffairs. "ActionPlanfor Meetingthe ClosingBenchmarks inNegotiation Chapter23 – Judiciary and Fundamental Rights. 52). MHMR. Strategy for the Protection of Persons with Disability and Promotion of Equality 2022-2027. 2022.

[126]Ibid.4.

[127]Ibid.27.

services,particularlyatthelocallevel.[128]However,participantsinWRC'sresearchstatedthat they have never sheltered or supported a woman with a disability. Moreover, the shelters visited do not have infrastructural conditions to support access for women with disabilities, such as specialised toilets, rooms and an accessible shelter building.

TheMHMRhasthe main responsibility for coordinatingtheStrategy's implementation.[129]However, public financial policiesdonotcontainclear budget lines regarding personswithdisabilities,[130] especiallyforwomenwith disabilities who have experienced gender-based violence. The Strategy clearly defines sources of secured budget allocations for activities, including donors, the state budget and IPA funds.[131] However, the policy calls for increased and more rational budget allocations regarding social services for people with disabilities.[132]

Table 9. Strategy for the Protection of Persons with DisabilitiesfromDiscriminationandPromotionofEquality 2022-2027

Criteria	Finding
Strategy/APclearlystatebudgetforallactivities	No
Budgetedamountsaresufficientforrealisingactivities	No
Theinstitutionresponsibleforthebudgetis clear	Yes
Sufficientstateresourcesareallocated(withoutdonor dependency)	No
Thebudgetisfullyallocated(secured)	Yes
Theallocatedbudgetisspentasplanned	NA

Regarding specialised social services, the 2022-2023 AP clearly allocates "regular budgetfunds"formakingexistingservicesforprotectionfromviolence,sheltersandreception centresmoreaccessibletopersonswithdisabilitieswhohavefacedgender-basedviolence.[133] However, the 2022-2023 report on the Strategy's implementation stated that this measure has not been realised because a similar measure was planned by the National AP on the ImplementationoftheIC.[134]TheNationalPlanimplementationreportstatedthatthismeasure of providing access to specialised services to marginalised women, including women with disabilities,hasbeensuccessfullycarriedout.[135]The2025APforesaw"draftinganewLawon Social and Child Protection which will address access to services in accordance with the UN Convention on the rights of persons with disabilities" by theendof2025.[136]EvaluationoftheStrategy'simplementationandeffectivenessisexpected to be conducted ex-post in the beginning of 2027.[137]

Conclusion

Whilestrategies tendto identifyresponsible institutions, they donotclearly define all budget lines and allocations for the envisaged activities or services. Strategies tend to refer to"regularbudgetfunds",whichisunclearregardinghowmuchfundsareplannedtobe

[128] Ibid. 67. The limited numberof gynaecologicalchairstailored for women withdisabilities has increasedin 2025, as statedbythe newAP.However,thereisnoevidence asto whether thisnumberissufficientto meet the needs of women with disabilities, including those who have experienced gender-based violence.

[129]Ibid.4.

[130]Ibid.9.

[131]Ibid.79-80.

[132]Ibid.53.

[133]ActionPlan forthe ImplementationoftheStrategyforthe Protectionof PersonswithDisabilities from Discrimination and Promotion of Equality, for 2022-2023. Operational goal 5, Measure 5.7. 2022. 98.

[134]Reportontherealizationof anAction Plan for the ImplementationoftheStrategyfortheProtectionof Persons with Disabilities and Promotion of Equality (2022-2027) for the period 2022-2023. 2024. 61.

[135]MSWFD."Reportonthe realizationofthe NationalPlan forthe ImplementationofICfor the period2023-2024. 2024. 8-10.

[136]Reportontherealizationof anAction Plan for the ImplementationoftheStrategyfortheProtectionof Persons with Disabilities and Promotion of Equality (2022-2027) for the period 2022-2023. 132.

[137]MHMR.StrategyfortheProtectionofPersonswithDisabilityandPromotionofEquality2022-2027.80.

spent. Although obligatory gender impact analysis across different sectors and levels of decision-makingisrecognisedbytheLawonGenderEqualityofMontenegro,non-recognition ofGRBintheLawontheBudgetandFiscalPolicyremains themainissuehinderingplanning, allocatingandsecuringbudgetsforserviceprovidersofspecialisedservicesforwomenvictims ofgender-basedviolence.Often,budgetallocationsseeminsufficient.Moreover,asobserved by the GREVIO Committee, international donors are foreseen as a funding source for implementing numerous measures, presenting a risk to their implementation.[138] Meanwhile, existing policies and budgets for the social protection of women with disabilities, Roma and Egyptianwomenhavenotbeensufficientlyanalysedtosupportthedevelopmentofnewsocial protectionstrategies.Insomeinstances,foreseenallocationshavebeensentasplannedwhile others have yet to be evaluated. In summary, strategies and APs for addressing violence against women have not allocated sufficient resources for specialised services.

InstitutionalResponsibilities

This section first examines the existing mechanisms for the inter-institutional coordination in the protection of women victims of gender-based violence. It then analyses the institutional framework for GRB, strategic planning and financing of specialised services, outliningtheresponsibilities of thekeyinstitutionsinvolvedin planning,budgeting,oversight and service provision.

Inter-institutionalCoordinationinProtectingVictims

Montenegro has a legal and policy basis for multi-agency coordination in cases of domestic violence. The Law on Protection from Domestic Violence, particularly Article 11, provides that the police, misdemeanour bodies, public prosecution service, CSWs, CSP institutions, healthcare institutions and other relevant bodies have a duty to provide victims with"fullandcoordinatedprotection",whileNGOsmayalsoprovideprotectioninaccordance with the Law. The Law requires mutual communication and assistance among institutions to prevent and detect violence, eliminate its causes and help victims regain safety. It allows CSWs to establish expert teams composed of representatives of CSWs, local government, service providers, police, NGOs and family experts to prepare victim assistance plans and coordinate support activities in accordance with the victim's needs and choices.

Inpractice,GREVIO'sFirstThematicEvaluationReportonMontenegrofoundthatlocal multidisciplinary teams have largely been replaced by case conferences for individual cases, butthese"seemtoexistmoreintheorythaninpractice"andarerarelyheld.[139]GREVIOnotes that the case worker in the CSW is expected to coordinate with professionals from other institutions, but thereisno clear obligation to organise case conferences; women's specialist support organisations also reported that their requests for such conferences are usually not actedupon.Overall,cooperationisoftenbasedonindividualprofessionalrelationshipsrather than institutionalised procedures, and where case conferences are held, data protection arrangements remain unclear.

At the national level, Montenegro also has an **Operational Team for Combating DomesticViolenceandViolenceagainstWomen**,establishedin2018toensurehigher-

[138] GREVIO. "Buildingtrust, bydeliveringsupport,protectionandJustice:Montenegro first thematicevaluation report". GREVIO (2024)10. 2024. 13.

[139] GREVIO.FirstthematicevaluationreportforMontenegro.2024. https://rm.coe.int/first-thematic-evaluation-report-building-trust-by-delivering-support-/1680b28771.

levelmulti-agencycooperation.ItwasoriginallyestablishedundertheMinistryofInteriorand included representatives of relevant ministries, the Police Directorate, the State Prosecutor's Office, courts and selected NGOs. Its role was to supervise high-risk cases, identifysystemic shortcomingsininstitutionalresponsesandmakerecommendationsforimprovingthegeneral systemof protection,basedon reviewof representativecases.TheTeamwas re-established in2024atacross-governmentallevel,asa**strategicandsupervisorycoordinationbody**, and not as a substitute for local case conferences or multidisciplinary teams. Its mandate should include monitoring the functioning of the protection system, reviewing complex and high-risk cases, identifying recurring institutional failures, proposing systemic measures, ensuring implementation of GREVIO recommendations and IC standards and improving cooperation between ministries, police, prosecution, courts, CSWs, health institutions and specialised women's NGOs. It should not take over direct case management from local institutionsbutshouldensurethatlocalcoordinationmechanismsfunctioneffectivelyandthat institutional failures are addressed at policy and operational levels.

Montenegroneedstoimprovemulti-agencycooperationinallcasesofviolenceagainst women,notonlydomesticviolence,byensuringthatmulti-agencyteamsfunctioninpractice and include specialist women's and children's support services where relevant; that interventions are based on a gendered understanding of violence, victims' safety, human rights and the victim's perspective. This should include a clear legal or by-law obligation to convene regular multidisciplinary meetings and urgent case conferences in high-risk cases; mandatory participation of CSWs, police, prosecution, health institutions, municipalities and specialised WCSOs; clear confidentiality and data protection rules; survivor consent and safety-centred procedures; minutes and follow-up obligations; and regular monitoring of implementation. The costs of these periodic coordination meetings include space, coordination, documentation, secure data management, travel costs where necessary and participation of specialised WCSOs. These should be covered by the state and/or municipalities, rather than depending on donor-funded projects or informal professional relationships. This is necessary to ensure that coordination becomes part of the protection system, not an ad hoc practice dependent on individual commitment.

GRandGBV-relatedstrategicplanningandbudgeting

TheParliamentof Montenegro

TheCommissiononGenderEqualityoftheParliamentofMontenegro,asapermanent bodyoftheParliament,adoptslawsandmonitorstheimplementationofstrategiesrelatedto gender equality;[140] considers and monitors proposals of laws and other relevant documents concerninggender equality;isincludedindraftingandcomplianceof Montenegrinlegislation with the EU acquis and EU programs regarding gender equality; and cooperates with other relevantinstitutionsandWCSOsdealingwithgenderequality.[141]Additionally,theCommission is taskedwith pre-assessingtheAnnual BudgetLawandidentifyingshortcomings in theGRB implementations process.[142]

TheParliamentaryBudgetOfficeisaninstitutiontaskedwith "providingprofessional supporttoMembersofParliamentbypreparingresearchpapers,analyticalinformational

[140] MHMR. "NationalStrategyonGender Equality2021-2025withitsaccompanyingActionPlan2021-2022". 2021. 16.

[141]GovernmentofMontenegro. CommitteeonGender EqualityoftheParliamentofMontenegro.Accessed:22 April 2025. Available at: https://www.skupstina.me/me/radna-tijela/odbor-za-rodnu-ravnopravnost.

[142]Damjanović,MinjaandXhani, Blerina."Stateofplayofgender-responsivebudgetinginMontenegro: overviewofkeyachievements,gapsandwaysforward".UNWomenEuropeandCentralAsia.2024.28.

materials, and summarising the relevant official domestic publications and publications of international institutions on topics of significance for the implementation of economic and fiscal policy, as well as the budget and budgetary policy".[143]

GovernmentofMontenegro

MinistryofHumanandMinorityRights

Within this Ministry, the Gender Equality Department coordinates activities regarding gender equality,participates in thedevelopmentof local andnational action plans,publishes data on violence against women and actively monitors the implementation of international genderequalitystandards,aswellastakesactiontoincorporatethemintothedomesticlegal system.[144] Most importantly, it monitors the implementation of the Law on Gender Equality and National Strategy for Gender Equality. Moreover, it coordinates the work of the ***Commissionfortheimplementationandmonitoringofthegenderequality strategyandAP***.[145]

GeneralSecretariatoftheGovernmentof Montenegro

The Secretariat proposes the adoption of strategic documents to the Government, ensures their quality and provides opinions and recommendations regarding strategic documents. This Government body also assesses compliance of Montenegrin strategic and national development plans with requirements for EU Accession, thematic EU policies and other fundingrequirements.[146]Inaddition to the Gender EqualityDepartmentof the Ministry of Justice (MJ), the ***SectorforStrategicPlanningandCoordinationof Government policiesintheGeneralSecretariat***alsoisakeystakeholderresponsibleforgender mainstreamingstrategicdocuments.[147]GRBhasbeenaddressedinitsMethodologyforpolicy development in the section regarding budgeting for activity implementation. This document emphasises the importance of GRB implementation in public funding, emphasising the need to link funding to existing gender equality issues.[148]

In accordance with the Law on Gender Equality, ministries and other administrative bodies are obliged to appoint state officials as focal points for cooperation, implementation andpolicymonitoringrelatedto gender equality.[149] Since 2016,more than 109 officialshave been appointed on the national and local level. In addition, all municipalities are required to develop gender equality action plans to efficiently address local specific needs.[150]

Ministryof Finance

In accordance with the Manual for Program Budgeting, the MF is responsible for developing and executing the program budget. Further, the MF issues the budget circular containing instructions for gender-responsive statements, gender-responsive objectives and

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[143]ParliamentaryBudget Office. Officialmandate.Accessed6February2026.Availableat: https://pbk.skupstina.me/. 28.

[144] MHMR. "NationalStrategyonGender Equality2021-2025withitsaccompanyingActionPlan2021-2022". 2021. 16.

[145]Ibid.

[146]Ibid.16.

[147]Damjanović,MinjaandXhani, Blerina. "Stateofplayofgender-responsivebudgetinginMontenegro: overviewofkeyachievements,gapsandwaysforward".UNWomenEuropeandCentralAsia.2024.21.

[148]Ibid.23.

[149]LawonGenderEqualityMontenegro. Article23.2022.

[150]MHMR. "National StrategyonGenderEquality2021-2025withitsaccompanyingActionPlan2021-2022". 2021. 16.

indicators for programs, activities and projects. It also prescribes reporting templates for implementing the program budget, including reporting on the achievement of gender-responsiveobjectivesandindicators.Itbuildsthecapacityofspendingunitsforimplementing GRB and utilises data and evidence on gender disparities from budget expenditure reports submitted by spending units to shape future budget policies. The executive summary of the MF'sreportprovidesinformationonbudgetprogramsthathaveincludedgender-relatedissues in their budget documents, but it does not include gender impact analyses reported by line ministries.

The ***Directorate of State Budget*** oversees the process of formulating and implementing the program budget. The Division for the **Medium-term Budget Framework**(MTBF), Programme Budget and Management of Fiscal Risks has two divisions: theDivisionforProgramBudgetingandDevelopmentoftheBudgetSystem,andtheDivision for the Medium-term Budget Framework, Fiscal Risk Management and Reporting. The Directoratecoordinatesthedevelopmentofprogramclassificationsfortheannual BudgetLaw and MTBF in cooperation with other divisions of the Directorate; develops the program methodology and budget system; coordinates GRB, child budgeting, budgeting in line with SDGs and other dimensions of budgeting in accordance with best practices and the Law.

MinistryofSocialWelfare,FamilyCare,andDemography

WithinMSWFD,theDirectorateforFamilyCareandChildProtection,DivisionforFamily CareandProtection againstViolenceagainstwomen andDomesticViolenceis competentfor financing social services. Moreover, the Division is responsible for monitoring IC implementation.[151] The Reform Agenda obliged MSWFD to establish three Sexual Violence Crisis Centres for victims of sexual violence in line with the standards prescribed by the IC, ensuring the provision of integrated medical, legal and psychological support services to victims.

StateAuditInstitutionofMontenegro

In accordance with the Constitution of Montenegro, the State Audit Institution of Montenegro(SAI)auditsthelegalityandefficiencyofthemanagementofstatepropertyand liabilities, budgets and all financial operations whose sources of funding are public or arise from the use of state property.[152] Pursuant to Article 5 of the Law on the State Audit Institution, the audit process establishes efficiency in achieving goals of specific financial transactions, programs and projects and their effects compared to planned impacts.[153] In 2023, SAI published two reports on the effectiveness of gender equality policies in Montenegro, and on the effectiveness of GRB implementation in Montenegro.[154]

Conclusion

Despitetheexistenceof arelativelycomprehensivelegal andinstitutional framework, Montenegrocontinuestofacesignificantchallengesinensuringeffectiveimplementationof

[151]MSWFD."Rulebookoninternalorganisationandsystematization".2024.7.

[152] ConstitutionofMontenegro.(Official GazetteofMontenegroNo.1/2007 and38/2013 - Amendments I-XVI). Article 144.

[153]LawontheStateAuditInstitution. (OfficialGazetteofMontenegro,No.28/04from29/04/2004,27/06from 27/04/2006,78/06from22/12/2006;Official GazetteofMontenegro, No.17/07from31/12/2007,73/10 from 10/12/2010, 40/11 from 08/08/2011, 31/14 od 24.07.2014). Article 5.

[154] StateAudit Institution.SAINo.02-035/23-420/20. "Reviewofsuccess:EffectivenessofImplementingGender EqualityPoliciesin Montenegro.Finalreport". 2023;StateAudit Institution. SAINo.02-035/23-1080/44. "Review of success: Effectiveness of Implementing Gender-Responsive Budgeting in Montenegro, Final Report". 2023.

gender equality policies, GRB and protection mechanisms for victims of gender-based violence. Many coordination mechanisms andinstitutionalresponsibilitiesremainstronger on paper than in practice, with limited accountability for failures in implementation, insufficient monitoring of outcomes and uneven cooperation among relevant actors. The persistence of fragmentedserviceprovision,inadequateinstitutionalisationofmulti-agencycoordinationand continuedrelianceonproject-baseddonorfundingforspecialisedsupportservicesundermine the effectiveness and sustainability of the protection system. To meet its obligations under the IC and international gender equality standards, Montenegro must move beyond formal compliance and adopt a more systematic, adequately funded and results-oriented approach that places victims' safety, rights and needs at the centre of policy planning, budgeting and service delivery.

MidtermBudgetCommitmentsforAddressingViolence against Women and Domestic Violence

Thesectionfirstdiscussesgeneralmacroeconomictrendsthatmayaffectfinancingof specialisedservices.Itthenexaminestheextenttowhichfundingforviolenceagainstwomen is reflected in MTBF objectives and whether indicators, baselines and targets exist for measuring progress.

GeneralTrends

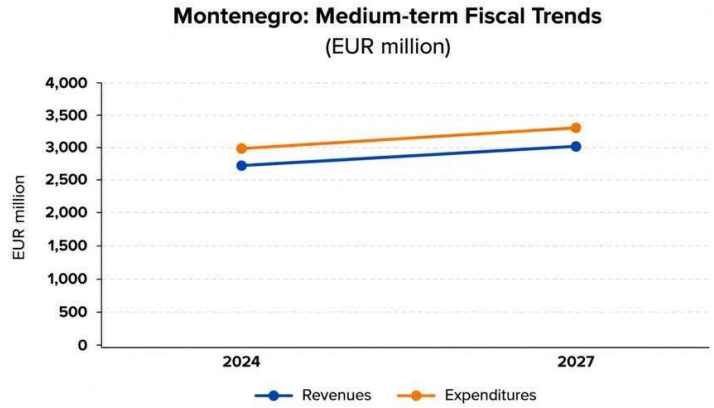
AccordingtotheFiscalStrategyofMontenegroforthePeriod2024–2027:

> Stronghouseholdconsumption,increasesin theminimumandaveragewagesaswell as minimum and average pensions, reforms of tax policy and the business environment, growth in investment activity, and the continued expansion of the tourism sector alongside sectoral support measures and relevant projections of economic activity and inflation in Europe constitute the key assumptions of the medium-term macroeconomic scenario.[155]

In line with the baseline macroeconomic scenario, the Montenegrin economy is projected to grow at an average annual rate of 3.7% over the medium term, specifically 3.8% in 2024, 4.8% in 2025, 3.1% in 2026 and 3.2% in 2027, respectively. As price pressures ease at the European level, inflation is expected to gradually decelerate, averaging 3% over the period 2025–2027.Originalbudgetrevenuesareprojectedto rangefrom€2,759.6million,or37.9% of GDP in 2024, to €3,081.2 million, or 35.8% of GDP in 2027. On the other hand, budget expendituresareprojectedtorangefrom€2,982.8million,or41%ofGDPin2024,to€3,349.9 million, or 38.9% of GDP in 2027.

Graph1.MontenegroMedium-termFiscalTrends

[155]Fiscal StrategyofMontenegroforthePeriod2024–2027.2024.6.



Given the projected medium-term economic growth and the stable fiscal outlook for the period 2024–2027, there is a clear opportunity to further strengthen the financing of services addressing gender-based violence. The anticipated increase in revenues, alongside responsible fiscal management, creates additional space for targeted social investments withoutunderminingfiscalsustainability.ForMontenegro,thisisparticularlysignificantinthe contextofongoingEUaccessionnegotiations,thegradualclosingofnegotiationchaptersand overallalignmentwithEUstandards,wherestrengtheninginstitutionalresponsesandsupport services for victims of violence against women represents an important benchmark in areas of rule of law, fundamental rights and social policy.

The budget is planned on a multi-year and annual basis. The MTBF serves as the foundation for adopting the annual budget. The annual budget is a financial plan based on estimates of revenues and expenditures. The budget is adopted for a fiscal year and is valid for the year in which it is adopted. The fiscal year corresponds with the calendar year. The budget is adopted in the form of a law.[156]

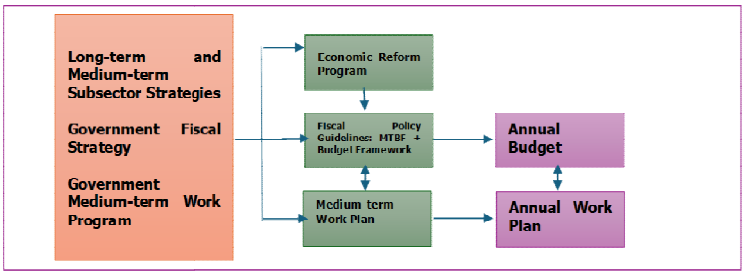
TheMTBFisgenerallyunderstoodasanintegralpartofthepre-budgetreportthrough whichtheGovernmentoutlinesitsfiscalandbudgetarypolicy.Itsetsfinancingprioritieswithin available resources based on macroeconomic and fiscal projections and the Government's Work Program. It defines medium-term spending ceilings for line ministries and first-level budgetary units.

The MF prepares Fiscal Policy Guidelines (FPG) based on the Government's medium-term Fiscal Strategy and macroeconomic projections. The FPGs are presented in the Macroeconomic and Fiscal Policy Guidelines, which is adopted by the Government. The FPG contains macroeconomic projections and a three-year fiscal framework, prepared in accordance with the Government's Fiscal Strategy and the Economic Reform Program.

Graph2.LinkingStrategieswiththeAnnualBudgetandGovernmentWorkProgram[157]

[156]LawontheBudgetof Montenegro.2025.Accessedon 23April2025.Availableat: https://me.propisi.net/zakon-o-budzetu-i-fiskalnoj-odgovornosti/

[157]GovernmentofMontenegro.Informationontheimprovementofthebudgetingsystemandthe Medium-term budget framework.Accessedon17April2025.Availableat: https://wapi.gov.me/download/39069231-f55b-49b1-a249-9f3c9d360a97?version=1.0



During the budget preparation process for 2021, a new **Program Budgeting Methodology** was implemented. This methodology is aligned with international standards and practices, adapted to Montenegrin conditions and legal regulations. It facilitates introducing GRB.[158] The MF adopted the Guidelines for the Preparation of the Medium-term BudgetFramework, the Guidelinesfor the Preparation ofthe Budgetfor the UpcomingFiscal Year, the Manual for Program Budgeting and the Manual for the Medium-term Budget Framework.[159] These documents provide guidance on how to incorporate GRB into program budgeting. Objectives and indicators are set within a medium-term plan. When submitting budget requests, budgetary units implementing gender-sensitive activities are required to provide information on gender-related objectives and indicators through the budget management information system, along with an explanation of how their budget programs (subprograms, projects and/or activities) contribute to reducing gender disparities and improving the status of vulnerable groups in society.

Integratinggenderissuesintopublicfinancemanagementispartofthe Public Finance Management Program and is elaborated in its operational objectives and activities. The EC 2024Reportstates thatMontenegrohasprogressedinGRB;however,itisstillnotintegrated into the legal framework and efforts are yet to yield concrete results.[160]Similarly, in its performance audit on the Effectiveness of the Implementation of Gender Equality Policies in Montenegro, the SAI assessed that:

> Theimplementationofgenderequalitypoliciesin Montenegrohasnotbeensufficiently successful. It was determined that the existing normative framework supports and promotes gender equality in Montenegro, although challenges remain in achieving equality in the treatment and realization of rights for women and men. Deficiencies were identified in the implementation and reporting of program (gender) budgeting, indicating the need for improvements and precise definition of competencies and responsibilities for the implementation of budget programs by spending units.[161]

Notably, implementing gender equality policies **is not mandatory.** The audit authority concluded that only a few entities comply with it, emphasising the importance of making it mandatory.TheMFispreparingamendmentstotheLawonBudgetandFiscalResponsibility, which will include provisions for gender budgeting in line with EU best practices.[162]

Withinprogramclassifications,allprograms,subprogramsandactivitiesimplemented bybudgetusers(spendingunits)aregroupedinto12mainprograms,whichshowthe

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[158]The State Audit InstitutionReport onthe Effectivenessofthe ImplementationofGender Equality Policiesin Montenegro. 2023. 45.

[159]Thesedocumentsarenotpubliclyavailable;theyaredevelopedbyMFanddistributedtospendingunits.

[160]ECMontenegroReport2024.2024.25.

[161]The State Audit InstitutionReport onthe Effectivenessofthe ImplementationofGender Equality Policiesin Montenegro. 2023. 6.

[162]PublicFinanceManagementReformProgram2022-2026.2025. 18.

purposes for which the budget is spent.[163] One of these is **Program 22 – Social Welfare**. AccordingtotheGuidelinesforMacroeconomicandFiscalPolicyfundsunderthisprogramare intendedforvariouspurposes,includingCSP,protectionofpersonswithdisabilities,protection of the elderly, **combating domestic violence and the protection of children from violence**.[164]Thechapterincludesmultiplespendingunits,namely:MF,theAdministrationfor Capital Projects, the Social Council, the Agency for Social and Child Protection, MSWFD and the Pension and Disability Insurance Fund.

In accordance with international legal frameworks and the conventions ratified by Montenegro, a government priority is preventing all forms of violence against children and women, peer violence and domestic violence.[165]

In the **Government's Medium-term Work Program** Priority 3 "Healthy and educated individuals as the foundation of a prosperous and cohesive society", Objective 18, "A SupportiveSociety for a DignifiedLife", focuses onimprovingaccess to andthe quality of CSP by strengthening legislation and adopting strategic documents (see Table 10).[166]

Table 10. Government's Medium-term Work Program Priority 3 "Healthy and educated individuals as the foundation of a prosperous and cohesive society" - Objective 18, "A Supportive Society for a Dignified Life"

Goal18:	ASupportiveSocietyforaDignifiedLife			
Performanceindicator	Baselinevalue 2023	Interimvalue 2025	Interimvalue 2026	Targetvalue 2027
Numberofsocialandchild protection service providers for victimsofgender-basedviolence[167]	13[168]	Increase5%	Increase5%	Increase5%

The **Updated Public Financial Management Reform Program 2022-2026 (2025)**defines operational objective 1.3 with indicators and detailed activities for "Further developmentofprogrambudgetingwithafocusonthegenderdimension"(seeTable11).[169]

Table11.ActionPlan–OperationalObjective1.3-"Furtherdevelopmentofprogram budgeting with a focus on the gender dimension"

Indicator	Source of Verification	Baseline Value (2021)	Interim Value(by 2023)	Target Value (2026)

[163]Names andcodesofthemain programs(11 -Politicalsystem andgovernance,12-Judiciary and protection of rights, 13 - Public security and defence, 14 - Public finances, 15 - Economy and tourism, 16 - Agriculture, forestry and water management, 17 – Transport, 18 - Spatial planning and environmental protection, 19 - Education, science and sport, 20 – Culture, 21 – Healthcare, 22 – Social Welfare).

[164]GovernmentofMontenegro.Draftguidelinesformacroeconomicandfiscalpolicyfortheperiod2024–2027. Accessedon17April2025.Availableat: https://www.gov.me/dokumenta/e5286401-6770-4635-8cd2-d348a6c5e83a.

[165] Government's Medium-term Work Program2024-2027. 2024. 15. In2024,theMinistrywasdividedintwo separate ministries: the Ministry of Labour, Employment and Social Dialogue (MLESD) and MSWFD.

[166] Government of Montenegro. General Secretariat. Medium-term work program of the Government of Montenegro2024–2027andworkprogram ofthe Government for2024.Accessedon17April 2025.Availableat: https://wapi.gov.me/download-preview/ee885398-748f-48fd-912a-29bbac334bfb?version=1.0.

[167]RegisterofLicensedServiceProviders, MLSW,accessedon23 April2025.Available at: https://www.gov.me/dokumenta/06942559-ef10-4559-baa1-90e24e3c9b73.

[168]The valueachievedin2024is 25.

[169]UpdatedProgram forPublicFinancialManagementReform2022-2026.Accessedon17 April2025.Available at: Ažurirani Program reforme upravljanja javnim finansijama 2022-2026.

Percentage of spending units with integratedgender-orientedpolicies in the program budget	Ministry of Finance(MF)	0%	10%	20%

The Strategy for the Development of the Social and Child Protection System for the period 2025-2028, Action Plan for 2025 contains Operational Objective 2: Improvement of CSP services by increasing the number of beneficiaries with access to services, including: establishing a clear normative framework for financing services at national and local levels; increasing budget allocations for CSP services by 260%, from €5.5 million in 2024 to €20 million in 2028; expanding the number of licensed service providers from 532 to 600; increasing the number of shelters for vulnerable groups from three to five; and establishing specialised services for women and children victims of sexual violence with at least three services operational by 2028.[170] Measures (i.e. planned activities) include defining methods for financing CSP services at national and local levels, as well as developing pricing methodologies for counselling, shelters, group homes and integrated services for vulnerable groups. Other actions involve establishing bylaws and protocols for crisis centres for victims forsexualviolence,regulatingserviceproviderconditionsandassessingoverallserviceneeds. These activities are coordinated by various government bodies (e.g., MSWFD, Ministry of Health[MH],MJ),WCSOs,theRedCross andmunicipal unions.Mostarescheduledbetween Q1 2025 and Q4 2026. Funding is primarily expected from regular budget sources, and, in some cases, from donor funds. Several tasks state that they do not require additionalfunds.

Within the **National Action Plan for the Implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and DomesticViolence(IstanbulConvention)2023-2027**,ChapterIIon"HolisticResponse toViolenceAgainstWomenincludesOperationalObjective2"Ensureefficient,comprehensive, and coordinated policies across the entire country through improved institutional, financial, and organizational framework". It aims to improve the institutional response to violence against women by increasing the number of specialists in key institutions.[171]By 2025, the number of specialised experts in CSWs, police, health institutions, local governments, and ministries is expected to increase by 20% in 2025 and by 30% in 2027. Additionally, it aims to increase financial resources for the prevention of all forms of violence covered by the IC, targetinga 30%increaseby2025 and 50%by 2027.Further,itplans todevelop a database andmakeitaccessibletoall relevantinstitutions withthegoalof expandingaccess fromtwo institutions to four by 2025 and six by 2027.

Measures planned under Operational Objective 2 are: strengthening the legal and financialframeworkforthepreventionandeliminationofallformsofviolence.Theseinclude adopting and implementing relevant laws and measures that ensure gender equality, allocating sufficient professional and financial resources for institutions and organisations working to protect women, and increased state budget allocations to demonstrate financial accountability and ownership (€1,000,000 Q1 2023 – Q4 2027). **Particular attention is giventoensuringsustainablefundingforwomen'scivilsocietyorganisationsthat provide specialised services to victims of violence, including the establishment of long-termgrantsandimprovementstopublicprocurementprocedures** (€1,000,000 Q4 2024 – Q4 2027). Legislative and by-law amendments are also foreseen to ensure the accessible services for women with disabilities who have experienced violence, as well as to enablelicensedWCSOstoprovidespecialisedsupportserviceswithoutbeneficiaries

[170]MSWFD.Strategyforthe developmentofthesocialandchildprotection system for the period2025–2028. 2024. Accessed on 17 April 2025. Available at: https://www.gov.me/dokumenta/bb77fe25-5ffd-43a2-9313-738e0e0b725e.

[171]NationalPlanforthe ImplementationoftheCoEConventionon PreventingandCombatingViolence Against Women and Domestic Violence (Istanbul Convention), for the Period 2023–2027. Montenegro. 23.

necessarily being referred from CSWs. In line with efforts to enhance coordination and data collection in preventing and eliminating violence, two additional measures are planned. One foresees establishing one or more official coordination bodies with mandates to collect, coordinate,implement,monitor andevaluatepolicies relatedtoall forms of violencecovered bytheIC.ThesebodieswillincluderepresentationfromrelevantWCSOsandareexpectedto produceannualpublicreportsontheiractivities.Thismeasurewillbefinancedthroughregular state funds and is planned for the period from Q4 2023 to Q4 2027. The second measure involves the collection of standardised and disaggregated statistical data at regular intervals on allformsof violence against women withspecial attention to casesinvolvingwomen with disabilities, as well as maintaining detailed records on related health, social and child protection services. This activity is planned for Q4 2027 and to be financed through donor funds, highlighting the need for external support in building comprehensive data systems essential for evidence-based policy making and monitoring.

Under Chapter IV Protection and Support, Operational Objective 4 includes to "Establishandstrengthenspecializedservicesinaccordancewiththe Conventionandprovide protection and support to victims and witnesses of all forms of violence covered by the Convention, in order to ensure the realization of human rights and the safety of victims". It foresees increasingthe licensingof specialisedservices in line with the IC from three to four services, with a target of six services by 2027.[172] The number of shelter places for women victims of domestic violence is expected to rise from 38 in 2023 to 50 by 2025 and 62 by 2027. **New services for victims of forced marriages, stalking and sexual violence are planned to be established including three services by 2025 and five by 2027. Additionally,one crisiscentreforsexualviolencecaseswillbedevelopedby2025 and additional two by 2027.**

Operational Objective 4 also outlines a series of measures aimed at improving institutional responses toand children, focusing on strengthening inter-institutional cooperation, ensuring access to clear information, support services, legal assistance and specialised care. Key activities include reviewing and applying protocols, distributing informational materials, training professionals and enhancing complaint mechanisms. ResponsibleinstitutionsincludetheMSWFD,MJ,MH,MHMR,theSupremeCourtandWCSOs. Most measures are scheduled from Q4 2024 to 2027 and are funded through regular funds. Additionally, these objectives outline key actions for supporting victims of gender-based violence, especially women and children, through improved infrastructure, services and protocols (€600,000). It includes establishing an adequate number of safe houses with consistent funding and geographic coverage, enhancing services to empower women's work andindependence**andenablingthecreationofaccessiblecrisiscentresforrapeand sexual violence victims, offering medical, forensic, trauma and counselling services (€150,000 donor funding).** It also proposes programs to support children who havewitnessedviolence,ensuringlegalandpsychosocialassistance(€2,000+45,000).[173]Each action is linked to responsible institutions, implementation timelines (from Q3 2024 to Q4 2027) and estimated funding sources, including regular funds and donations.

Table12.ProposedBudgetfortheImplementationoftheNationalActionPlanforthe Implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention) 2023-2027

Operationalobjectives	Budget (€)	Donations (€)

[172]National Plan for the Implementation of the CoE Conventionon Preventing and Combating Violence Against WomenandDomesticViolence (IstanbulConvention), forthePeriod2023–2027"Montenegro.36. The document does not state clearly which services these are.

[173]ThisishowitiswrittenintheAP.

Ensure the promotion and protection of everyone's rights, especially women's,tolivefreefromviolenceinbothpublicandprivatespheres,in accordance with the principles of equality and non-discrimination.	1,000,000	0
Effective,comprehensive,andcoordinatedpoliciesacrossthecountry, supported by all necessary institutional, financial, and organizational structures.	2,000,000	35,000
Achieving gender equality and preventing violence against women through changing societal and cultural behaviors of women and men, eliminating prejudicesandgenderstereotypes,adequatetrainingofallprofessionals,as well as programs for perpetrators of violence to prevent furthervictimization of survivors of gender-based violence.	15,000	513,000
Establishingandstrengtheninglegislativeorothermeasures,inaccordance with international law, to provide protection and support to victims and witnesses of all forms of violence covered by the Convention, based on an understanding of violence against women and domestic violence from a gender perspective, focused on human rights and the safety of the victim.	957,000	0
Creatingthenecessarylegislativeframeworkforpreventingviolenceagainst women, to protect victims from further victimization and to ensure strong intervention and prosecution by law enforcement authorities.	0	40,000
Creating conditions for investigations and court proceedings to be conductedwithoutunduedelay,takingintoaccountanunderstandingof violence from a gender perspective, in order to ensure effective investigation and prosecution for all criminal offenses covered by this Convention.	0	4,000
Ensurethe practicalimplementationofArticle 52 ofthe Law onForeigners, whichallowsmigrantwomenwhoarevictimsofviolenceagainstwomento obtain, on humanitarian grounds, an autonomous residence permit, and develop gender-sensitive guidelines aimed at raising awareness among relevant actors about the specific protection needs of asylum-seeking women who are victims of, or at risk of, gender-based violence.	2,000	0
Mid-termevaluation	2,500	0
Totalbysourcesoffunding:	3,974,500	594,000
Total2023-2027		4,568,500

As illustrated by the overview above, although Montenegro has undertaken commitments toaddressviolenceagainstwomenthroughanumberofstrategies,actionplansandsectoral policies,thesecommitmentsarenotyetconsistentlyreflectedintheMTBFsandrelatedbudget programmes. As a result, it remains difficult to clearly trace how strategic objectives and planned measures are translated into medium-term budget allocations and annual spending plans. Strengthening the linkage between policy commitments, MTBF priorities and budget programmes would improve transparency and enable more effective monitoring of the resources dedicated to preventing and responding to gender-based violence.

MunicipalMedium-term Budgeting

Local governments do not use programme and performance budgeting or consider a medium-term perspective. Municipalities prepare their budget on a cash basis, with a traditional line-item structure. Budgets are not structured around programmes, and performance budgetingis not practisedat the local government level.Local governments do

not plan their expenditures over the medium term; they do not use MTBFs.[174]Since 2020, regulations have been adopted representing initial steps toward introducing gender-responsive local policies, including GRB. The MF adopted the Guidelines on the Preparation and Assessment of Impact Analyses of Decisions and Other Regulations of Local Self-Government Bodies, which include a gender dimension. Article 2 stipulates that the Impact AnalysisofRegulationsshouldincludedefiningtheproblemortheobjectivestobeaddressed by the proposed regulation, identifying and analysing options for solving those problems, assessing the fiscal impact, assessing the impact of the regulation on gender equality, stakeholder consultations, monitoring and evaluation.[175]

For this research, the Local Plan for the Promotion of Social Inclusion and the Development of Social and Child Protection Services 2024–2027 of the largest municipality and capital city of Podgorica was analysed as illustrative of municipal budgeting practices; it is also the most developed municipality in terms of specialised services so more relevant information was available compared to other municipalities.[176]

Within the Plan's Strategic Objective 4, "Improved support, protection and social inclusion services for victims of gender-based and domestic violence", the Table 13 provides an overview of related activities over a three-year period.

Table 13. Action Plan - Objective 4, "Improved support, protection and social inclusion services for victims of gender-based and domestic violence"

Activity	Indicators	Responsible Parties	Timeframe	FundingSources
4.8Strengthenthe capacities of the Shelter for domesticviolence victims	-Shelteraligned with standards -Atleast50 beneficiaries	Civil Society Organizations in cooperationwith Ministry and Secretariat for Social Welfare	2024–2027	€3,000annually Capital City, Ministry,Donors
4.9 Establish a Crisis Center for victims of violence againstwomen(per Istanbul Convention)	- Service established -200 beneficiaries	Civil Society Organizations in cooperationwith Ministry and Secretariat for Social Welfare	2024–2027	€5,000 annually Ministry,Donors, Capital City
4.10Establisha support (reintegration) program for women victims of long-termviolence	- Number of programs implemented - Numberof participants	Ministry Secretariat for Social Welfare OfficeforGender Equality;WCSOs; Institutions; Int'l Orgs	2024–2027	Ministry,Capital City, Donors

The table illustrates that although several actors are identified as potential funding sources for activities, the distribution of financial responsibility among them is not specified. Availableinformationsuggeststhatresourcesmaybedrawnfromacombinationofmunicipal budgets, national allocations and donor contributions. However, the absence of a detailed fundingbreakdownlimitstransparencyregardingtheproportionofsupportfromeachsource.

[174]OECDPaperonbudgeting-StrengtheningpublicfinancialmanagementinMontenegro.2025. 17.

[175]MF.2024. Guidelinesforthe preparationandassessment ofimpactanalysisofdecisions andother regulations of local self-government bodies. Accessed on 17 April 2025. Available at: https://www.gov.me/dokumenta/552adc6e-4b4e-458b-a9ec-b8feedd2562f.

[176]Local Planfor the PromotionofSocial InclusionandtheDevelopmentofSocial andChildProtectionServices 2024–2027 Montenegro. 31.

Further, the documentation does not indicate how these commitments are embedded in the municipality'smulti-yearbudgetframework(whichdoesnotexist)orreflectedinthenational budget. Through the annual budget at the level of Podgorica, it is not possible to clearly determine whether funds for specialised services have been allocated, nor in what amount.

However,accordingtotheReportontheImplementationoftheActionPlanforAchieving GenderEqualityintheCapitalCity2023–2025(2023),aswellastheinterviewsconductedfor this research, the Capital City supports the Safe Women's House by providing the premises used as a shelter for women and children victims of violence.

AnnualBudgetCommitmentstoAddressingViolence against Women and Domestic Violence

One way of presenting budget expenditures is through **program classification**. Within this classification, all programs, sub-programs and activities implemented by budget beneficiaries(spendingunits)aregroupedin **12mainprograms**,whichshowthepurposes for which the budget is beingspent. One of theseprogramsis **Social Welfare** within which funds areplannedatthe central level thatcanbe linkedtospecialisedservices as definedby the IC. However, no clearly designated budget lines can be directly associated with services provided to victims of violence against women in annual budgets.

From2022to2025,allocationslargelyservedthesamepurposeswithslightvariations in execution due to changes in institutional responsibilities and external funding (e.g. EU projects). Budget tables do not clearly show where funds are intended for financing services for victims of violence against women or domestic violence. Thus, only the 2025 budget is presented as an example. In it, transfers for social protection amount to €1,068 million, accounting for 37% of the total planned expenditures for 2025 (see Table 14).

Table14.LawontheBudgetfor2025 -ExplanationofExpendituresbyEconomic Classification (42 – Transfers for social protection)[177]

Economicclassification	Planfor2025(€)	%share
42Transfersforsocialprotection	1,068,001,585	100
421Rightsinthefieldofsocialprotection	221,540,000	21

Rights in the field of social protection are planned to account for 21% of the total planned expenditures for social protection and are intended for: implementation of child allowances, protection of war veterans and persons with disabilities, material support for families, maternity leave benefits, assistance and care by another person, nutrition of children in preschoolinstitutions,maintenanceofbeneficiariesinresidentialinstitutionsandotherrights in the field of social protection. The specific amount allocated for specialised services for persons who have suffered violence against women is not stated.

Transfers to institutions, individuals, WCSOs and the public sector are planned in the amount of €444.4 million, which accounts for nearly 16% of total planned expenditures for 2025 (see Table 15).

[177]Parliamentof Montenegro.DraftontheLawon the Budgetof Montenegro for2025.2024.Accessedon17 April 2025. Available at: https://zakoni.skupstina.me/zakoni/web/app.php/akt/3552.

Table 15. The Law on the Budget for 2025 - Explanation of Expenditures by Economic Classification(43–Transferstoinstitutions,individuals,non-governmentalandpublic sector)[178]

Economicclassification	Planfor2025(€)	%share
43Transferstoinstitutions,individuals,non-governmentaland public sector	446,404,295	100
431Transferstoinstitutions,individuals,non-governmentaland public sector	401,052,338	90
432Othertransfers	45,351,957	10

Although a breakdown of the purposes of the planned funds is provided, allocated funds for servicesforvictimsofviolenceagainstwomenareunclear.[179]Thebudgetlawdoesnotprovide preciseinformationonthebudgetlinesunderwhichfundsintendedforfinancingservicesfor victims of violence against women are planned.[180]

Theonlyfundingforspecialisedservicesthatcanbetrackedisfundsallocatedthrough public calls. In 2022, MLSW allocated €300,000 through the public call "Protection Against Violence Against Women and Domestic Violence" for projects implemented by WCSOs in the fieldofprotectionfromviolenceagainstwomenanddomesticviolence.[181]Althoughthepublic call statedthat it was intendedfor specialisedservices in line with the IC, its criteria allowed participationbyamuchbroaderrangeoforganisations.Further,thecallcoveredthreepriority areas:activitiesimplementedbylicensedserviceproviders,capacitybuildingoforganisations for the licensing process and projects implemented by non-licensed service providers. The minimumprojectamountwas€20,000,whilethemaximumwas€40,000.Thiswasdistributed among 12 organisations, the majority of which were not specialised service providers. In addition, interviews conducted for this research, as well as the calculation of the allocated amounts, indicate that organisations were requested to reduce their proposed budgets prior tosigningcontracts.[182]InthesameyearTheMinistryalsoallocated€40,000forfinancingthe SOShelplineserviceforadultsandelderlyvictimsofabuseandviolence.[183]Thesefundswere awardedtoasingleorganisation,whichwasaspecialisedserviceprovider,althoughthepublic call did not explicitly require applicants to be specialised service providers. The organisation received the entire allocated amount because the only other applicant, which was not a specialisedserviceprovider,failedtosubmitcompletedocumentation.[184]Further,€100,000

[178] Official GazetteofMontenegro'swebsite. LawontheBudgetofMontenegro for2025.OfficialGazetteof Montenegro No. 11/2025. Accessed on 17 April 2025. Available at: https://www.sluzbenilist.me/propisi/3B74EDB7-095E-4176-9B7C-2777D6C50FA8?page=6

[179]Budgetline431includes:4311Transfersforhealthcare,4312Transfersforeducation,4313Transfersto culturalandsports institutions,4314Transferstonon-governmentalorganizations,4315Transferstopolitical parties, associations, and unions, 4316 Transfers for one-time social assistance, 4317 Transfers for interns' personal income, 4318 Other transfers to individuals and 4319 Other transfers to institutions.

[180]Nordid MSWFDprovideanywrittenresponsetoclarifywhich budgetlinesincludeallocations for addressing violence against women during WRC's research in 2025.

[181]MLESD.Publiccall forfinancingtheprojectsinthe area ofprotectionofwomenagainstviolence andviolence within the family for 2022. Accessed on 21 April 2025.Available at: https://www.gov.me/clanak/javni-konkurs-za-finansiranje-projekata-nvo.

[182]MLESD.Decisiononthеallocationoffundsfor financingNGOprojectsinthefieldofprotectionagainst violenceagainst womenanddomesticviolence.2022. Accessedon27April2025.Availableat: https://www.gov.me/dokumenta/0d890933-56d9-4418-afc8-78af8eeb2d9e.

[183]MFSW. Public call for the financing of the SOS telephone service for adults and elderly persons who are victims of abuse, neglect, domestic violence, and exploitation. 2022. Accessed on 21 April 2025. Available at: https://www.gov.me/clanak/javni-poziv-za-finansiranje-usluge-sos-telefona-za-odrasla-i-stara-lica-koji-su-zrtve-zlostavljanja-zanemarivanja-nasilja-u-porodici-i-eksploatacije.

[184]MFSW.DecisionNo.21-128/22-847/9.2022.Accessedon 27April2025.Availableat: https://wapi.gov.me/download/60e20f14-e192-46b6-84ee-91f8fac64ac6?version=1.0.

wasallocatedforsheltersforvictimsofviolence.[185]Thiswasdistributedtotwo organisations.[186] Although this public call was also not specifically intended for specialisedserviceproviders,bothorganisationsthatreceivedfundingwerespecialisedserviceprovi ders, whilethethirdapplicantwasreportedlyrejectedduetothelatesubmissionoftheapplication. In2023,MLSWagainallocated€300,000throughabroaderpubliccalltitled "AccommodationandCounsellingforVictimsofDomesticViolence"underthesameconditions as in the previous year.[187] This was distributed to 11 organisations, some of which were not specialisedserviceproviders.[188]Itallocated€39,998forfinancingtheSOShelplineservicefor abusedadultsandelderlypersons,[189]withthefullamountawardedtoonespecialisedservice provider.[190]Also,itallocatedfundsforshelteraccommodationforchildren,adultsandelderly persons, or adults with children who are victims of abuse, neglect, violence against women anddomesticviolence,awarding€99,928viaapubliccall,whichwasdistributedtotwo organisationsthatprovidespecialisedservices.[191]

In 2024, the MSWFD allocated €172,803 for counselling services through a public call titled"Counsellingfor Girls andWomen with Disabilities, LBTIQ Persons, Roma andEgyptian Women Victims of Violence".[192] Although the title of the call referred specifically to women from marginalised groups, the priority areas also encompassed other women victims of violence.Comparedtotheprevioustwoyears,when€300,000hadbeenallocatedforbroader public calls in the field of violence against women and domestic violence, this represented a reduction of approximately 42% in the total available funding. In addition, the amount availableperprojectwasreducedfrom€20,000–€40,000inpreviousyearsto€10,000–€15,000 in 2024. At thesame time, the number of supportedorganisationsincreased, which further reduced the amount of funding available per organisation. The grants were awarded to14organisations.[193]Morethanhalfwerenotspecialisedserviceproviders.Thereductionof the overall budget for this public call placed small, specialised organisations, which do not have continuous institutional funding to license and maintain services, in an even more disadvantaged position, particularly considering that this represented their only opportunity to obtain funding from the Ministry. In the same year, the Ministry allocated €200,000 for shelter accommodation services, which represented a 100% increase in the total fund allocatedforshelterscomparedtopreviousyears.However,sincethefundingwasdistributed among four organisations, the amount allocated per organisation effectively remained unchanged.[194] Further, it allocated €40,000 for financing the SOS helpline for abused adults

[185]MLSW. PublicCall No.01-128/22-1090/1.2022.Accessedon26April2025.Availableat: https://www.gov.me/dokumenta/72cf58d5-a6e3-48a3-bd5a-9e92ad52d4d7.

[186]MLSW.DecisionNo.01-011/22-1090/6.2022.Accessedon27 April2025.Available at: https://www.gov.me/clanak/odluka-o-finansiranju-usluge-smjestaja-u-prihvatilistu.

[187]MLSW. Publiccallfor proposals:"AccommodationandCounsellingforVictimsofDomesticViolence. 2023. Accessed on 21 April 2025. Available at: https://www.gov.me/clanak/javni-konkurs-smjestaj-i-savjetovanje-za-zrtve-nasilja-u-porodici.[188]MLSW. Decision No. 01/-128/23-2826/40. 2023. Accessed on 29 April 2025. Available at: https://wapi.gov.me/download-preview/208cf437-8a9e-4e24-a8cd-26358ec17293?version=1.0.[189]MLSW. Public call No. 2023. Accessed on 21 April 2025. Available at: https://www.gov.me/dokumenta/ea5a7e16-25d2-4e07-b908-f86fbdc4bf57.

[190]MLSW.DecisionNo.01-128/23-773/9.2023.Accessedon27April2025.Availableat: https://www.gov.me/dokumenta/870e0b27-9e86-4c53-9418-8c0db33a126a.

[191]MLSW. Decision No. 01-128/23-2393/17. 2023. Accessed on 30 April 2025. Available at: https://wapi.gov.me/download-preview/4cfd5a11-5851-41b0-8b5d-a778cc37a7ba?version=1.0.[192]MLSW. Public call. 2024. Accessed on 21 April 2025. Available at: https://wapi.gov.me/download-preview/b4db3e36-44c9-4027-a113-e0f219be6bdb?version=1.0.[193]MSWFD. Decision No. 01-128/24-140/10. 2024. Accessed on 23 April 2025. Available at: https://wapi.gov.me/download-preview/d14e5851-61cc-48e5-a6ad-495d11864e31?version=1.0.

[194]MLSW.Decisiononthefinancingofaccommodation servicesin areceptioncentre/shelter.2024. Accessedon 23 April 2025. Available at:

and elderly persons, provided to a single organisation, which was also the only organisation that applied.[195] Interviews conducted for this research indicated that local SOS helplines do not meet the conditions of the public call because they do not possess the required licence. According to interviewees, due to unstable and project-based financing, these organisations are unable to ensure continuous salaries for professional staff, which is one of the key requirements for obtaining and maintaining a licence.

In 2025, MSWFD plannedto allocate €170,000 for projects aimedatpreventing violence against women and empowering girls and women with disabilities, LBTIQ+ individuals and RomaandEgyptianwomenwhoexperiencedviolence.[196]Comparedtothe€172,803allocated in 2024, this represented a slight reduction of approximately 1.6% in the total available funding. Grants were again awarded to 14 organisations, around half of which were not specialised service providers.[197] In the same year, the fund allocated for shelter accommodation services increased from €200,000 to €500,000[198] representing a 150% increase compared to the previous year. The funding was again distributed among four organisations, which resulted in a significant increase in the amount allocated per organisation. Further, €45,000 was allocated for financing the SOS helpline for adults and elderlyvictimsofabuse,neglect,VAW,domesticviolenceandexploitation.[199]Thefundingwas awarded to a single organisation, which was also the only applicant.[200]

Additionally,intheMHMRbudget,fundswereplannedandallocatedwithinthebudget program12025–ImprovementandProtectionofHumanandMinorityRightsandPromotion of Gender Equality.[201] The allocation of these funds was not monitored, as this research did not focus on promoting gender equality generally.

TheplannedexpenditurespresentedintheBudgetLawfor2025forposition22025 - SocialProtectionis250,679,449,withprojectionsofapproximately256,569,510for2026and 259,101,200for2027.Thesefiguresreflecttheplannedexpendituresfortheupcomingyears based on current estimates. Information is only available in this consolidated form for the entire social protection program, without detailed projections for specific activities for 2026 and 2027.

Graph3.Allocationsforspecialisedservicesthroughpubliccalls

https://www.gov.me/clanak/odluka-o-finansiranju-usluge-smjestaja-u-prihvatilistu-sklonistu.

[195]MLSW.DecisiononthefinancingoftheSOStelephoneservice foradults and elderlypersons. 2024. Accessed on 23 April 2025. Available at: https://www.gov.me/clanak/odluka-o-finansiranju-usluge-sos-telefon-za-odrasla-i-stara-lica.

[196]MSWFD. Public call. 2025. Accessed on 23th of April 2025. Available at: https://wapi.gov.me/download-preview/1d9d9697-db8c-488c-aef9-14f30a23a640?version=1.0.

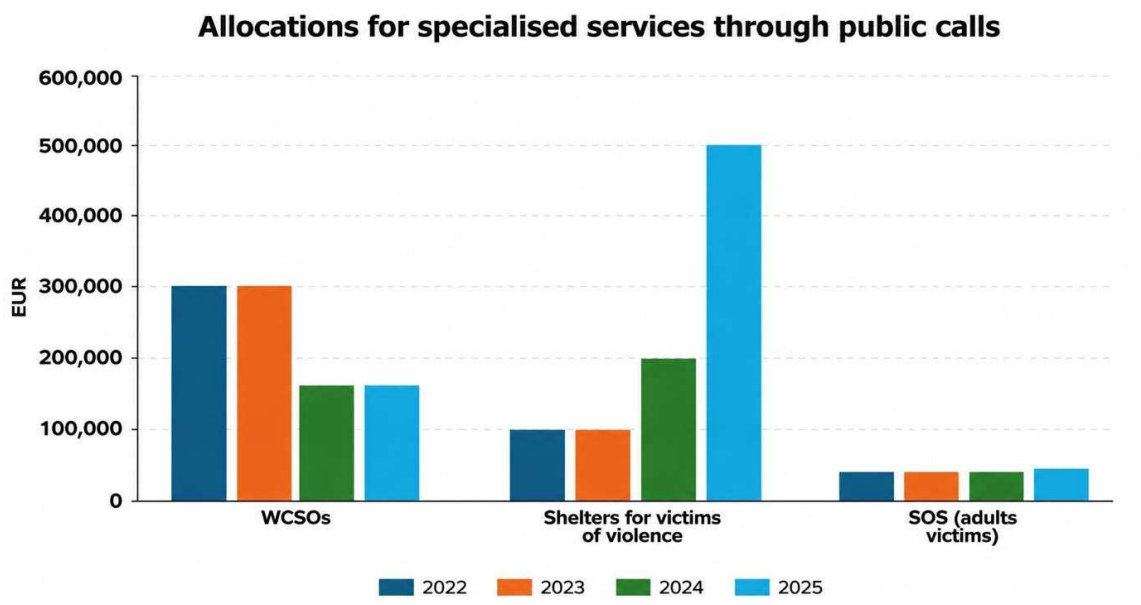
[197]MSWFD.Decisionontheallocationof funds forthe financingof NGO projects andprogrammes.No:01-128/25-2015/60. Available at: https://wapi.gov.me/download-preview/a3770405-8079-48a9-85b5-ac90c7b270d2?version=1.0

[198]MSWFD.Publiccall No. 01-128/24-2866/2.2024.Accessedon23thofApril2025.Availableat: https://www.gov.me/dokumenta/c8d47ad6-eb7b-4162-98e3-a65aef46173e.

[199]MSWFD. Accessed on 23th of April 2025. Available at: https://www.gov.me/dokumenta/31759f62-9ad2-4f24-9776-71ac2ec868d1.

[200]MSWFD. Decision on the Financing of the SOS Helpline Service for Adult and Elderly Victims of Abuse, Neglect, Gender-BasedViolence,Domestic ViolenceandExploitation,andPersons atRiskofVictimisation, forthe Period 1 January–31 December 2025. Available at: https://www.google.com/url?q=https://wapi.gov.me/download-preview/0c5dab72-9718-4ca5-a298-410179047201?version%3D1.0&sa=D&source=docs&ust=1780334541908661&usg=AOvVaw1qgRSMuJxo0WI13.gBpNz4Y

[201]MSWFD. Public call. 2024. Accessed on 8 August 2025. Available at: https://wapi.gov.me/download-preview/01c1ccb2-f0e3-4a20-aa33-8377185539fe?version=1.0.



Sincepubliclyavailabledatadoesnotindicatefromwhichspecific MSWFD budget lines these funds are allocated to organisations, it is not possible to monitor whether the Ministry actually distributed the amounts planned in the budget, nor to determine the difference between the planned allocations and the actual spending.

These findings demonstrate that financing for specialised services for women victims of violence against women in Montenegro remains largely dependent on project-based and external funding, without clear long-term state planning or dedicated budget lines. In this context, international and EU funding mechanisms represent an important opportunity for financing reforms and strengthening specialised support services. Montenegro has been granted €80 million in non-repayable support from the EU's IPA III, which represents a significant step forward in utilising EU funds to implement key reforms for EU membership. Funds are available through two multiannual financial agreements between the Government ofMontenegroandtheEU.Thesefundsincludesupportforreformstoimprovethequalityof life of citizens by strengthening employment and **social inclusion**. An amount of **€31.6 million intended for employment and social inclusion** is available through the Operational Programme for Employment and Social Inclusion (2024–2027). The Operational ProgrammeforEmploymentandSocialInclusionisfocusedon:strengtheningsocialcohesion, increasingemployment–particularlyamongyouthand**vulnerablegroups.**TheMSWFDhas claimedthatit"continuestoimprovethequalityandaccessibilityofsocialservices, **withthe aim of enhancing the living standards of the most vulnerable citizens**".[202]

EU IPA III funds relatedto social inclusion offer opportunities forfinancingreforms if allocated to improve specialised services. While important for immediate reforms, such as constructing rape crisis and sexual violence centres, such support is short-term. Meanwhile, theGovernmentplansforfundsforseveralkeyactivitiestocomefromforeigndonations.This can pose a risk to their implementation and sustainability in the long-term.

[202]MF."Montenegrosecures 80millionEUR inEUgrant funds:Results ofteamworkanddedicatedcoordination of IPA Structures". 2025. Accessed on 12 August 2025. Available at: https://www.gov.me/clanak/crna-gora-obezbijedila-80-miliona-eura-bespovratnih-sredstava-iz-eu-fondova-rezultat-timskog-rada-i-posvecene-koordinacije-ipa-struktura.

MunicipalBudgets

Of25totalmunicipalitiesinMontenegro,11providespecialisedservices:Bar,Berane, Bijelo Polje, Herceg Novi, Nikšić, Plav, Plužine, Podgorica, Rožaje, Tuzi and Ulcinj. The other 13 do not have any such services: Andrijevica, Budva, Cetinje, Danilovgrad, Golubovci, Gusinje, Kolašin, Mojkovac, Petnjica, Pljevlja, Šavnik, Tivat, Zeta and Žabljak.

Each municipality plans andadopts its own annual budget. Municipal budgets have a budget line called "Transfers to Institutions, Individuals, Non-Governmental and Public Sector". Within this budget item, there are budget lines presentedin the followingtables (8, 9, 10 and 11). Funds **could be allocated** from these budget lines for specialised services related to VAW. However, publicly available data do not provide precise information on allocations.[203]

For illustration, thissubsection provides anoverview of the municipalitiesof Podgorica, Nikšić,Bar andBijeloPolje.Thesewereselectedas partof thesampleto cover all regions of the country: central (Podgorica and Nikšić), southern (Bar) and northern (Bijelo Polje); and becausetheyhaveWCSOsprovidingspecialisedservices,suchasSOShelplines,sheltersand psychological support to survivors of VAW. Selection of such municipalities allows for better estimatingthecostsofsuchservicesbecausewomen'sWCSOsareprovidingthem;suchcosts could not be easily assessed where no such services are offered.

The***MunicipalityofPodgorica***didnotstateclearlyinitsannualbudgetsfor2022-2025whether anybudgethas beenallocated explicitlyfor specialisedservices for addressing VAWorDV.TheMunicipalityallocatedwithintheSecretariatforSocialWelfarefundsfor2024 and 2025 for "Other transfers to individuals - Supported housing". In 2024, the amount allocated was €2,000 and €4,000 were planned for 2025. It was unclear how this amount would be distributed and what "supported housing" entails.

Throughapubliccallin2022,theMunicipalityofPodgoricadistributedfundstoseven WCSOs. However, the organisations that received funding do not provide specialised services.[204] A review of the public call through which the Municipality awarded €60,000 to WCSOs in 2023 revealed that it was distributed to eight organisations working in various fields.[205] Part of these funds were awarded to an organisation that provides specialised servicesrelatedtoVAW,but thedecisiondoesnotstatewhichorganisationortheamountof fundsprovided.Generally,fundsdistributedthroughmunicipalpubliccallsarenot earmarked fororganisationsprovidingspecialisedservices.In2024,budgetexecutionforthebudgetline "transfers to NGOs" was under 3%; publicly available data show that calls for the allocation of funds to WCSOs were not published at all.

In 2025, Podgorica allocated €175,000 for a public call to fund NGOs working in the field of CSP. Priority areas included: assisting and supporting the elderly; improving social inclusionofpersonswithdisabilities,Roma,Egyptians,materiallyvulnerablefamiliesandother vulnerablegroups;encouragingthedevelopmentofCSPservices;andenhancingprevention, support and protection of victims of violence, as a priority. The Decision on the allocation of

[203] NordidthemunicipalitiesstudiedprovideclarificationsduringWRC's2025research, whichsuggests inadequate planning for specialised services and/or insufficient transparency.

[204]MunicipalityofCapitalcityPodgorica.RankinglistofNGOprojectsunderthepubliccallfortheallocationof funds. 2022. Accessed on 24 April 2025. Available at: https://starisajt.podgorica.me/storage/25079/62fe24166311a_Rang-lista-projekata-NVO.pdf.

[205]MunicipalityCapitalcity Podgorica.Rankinglistof NGO projectsunderthepublic call fortheallocationof funds. 2023. Accessed on 28 April 2025. Available at: https://starisajt.podgorica.me/storage/27010/6433daba6e5f9_Rang-lista.pdf.

fundsforthiscallshowedthat€29,700wereawarded,distributedamongfiveorganisations.[206] However, there were no organisations providing services to victims of VAW.

What can be seen through the final account of the Municipality's budget is that it is unclear whether activities related to violence against women are financed from the budget lines:"transferstonon-governmentalsector"and"one-timesocialassistancetransfers"inthe previous period 2022-2025.

The***MunicipalityofNikšić's***annualbudgetsfor2022-2025havenotclearlystated budget lines related to providing specialised services for addressing VAW. According to published public documents, the only funding available seems to be from general support to WCSOs. The website of the Municipality of Nikšić shows that public calls for funds for NGOs in 2022-2025 were in priority areas, includingwomen's entrepreneurship, sports, spatial and urban planning, agriculture, and rural development.[207] Violence against women was not included in the list of priorities for support in 2022,[208] 2023,[209] 2024[210] or 2025[211].

The***MunicipalityofBar's***annualbudgetsfor2022-2025havenotclearlystated budgetlinesrelatedtospecialisedservicesforaddressingviolenceagainstwomeneither.Like othermunicipalities,theonly fundingavailableseemsto befrom generalsupporttoWCSOs. In 2025, The Municipality of Bar financed one organisation providing shelter for victims of throughWCSOprojectfunding,aswellasthroughtheLocalActionPlanforachievinggender equality. However, these funds are for carrying out project activities but not directly supporting services.

Likeothermunicipalities,the***MunicipalityofBijeloPolje's***annualbudgetsfor 2022-2025 have not clearly stated budget lines for specialised services for addressing VAW. Publicly available data show that the Municipality of Bijelo Polje has had a budget line for socialhousingforseveralyears(€18,000in2023and€45,000in2024).Thiscouldpotentially be used to support survivors of VAW, among others. However, budget execution has been zero. The 2025 budget plan allocated €100,000.[212] Despite WRC's official requests, the Municipality didnot explain theintended purposeof thesefunds or why theywere not spent as planned. The organisation providing specialised services stated that "The last time the municipalityprovidedfundswasin2010,andsince2010theyhaveonlyannouncedacallfor WCSOstwoorthreetimes,whichraisesthequestionofwherefundshavegone."Meanwhile, theMunicipalityallocatedfrom€142,000in2022to€210,000in2025forthePublicInstitution

[206]Secretariat for social welfare. Decision No. 01-018/25-3597/5. 2025. Accessed on 18 September 2025. Availableat:https://podgorica.me/wp-content/uploads/2025/09/Odluka-o-raspodjeli-sredstava-za-finansiranje-i-sufinansiranje-projekata-i-programa-NVO-iz-oblasti-socijalne-i-djecje-zastite.pdf.

[207]MunicipalityofNikšić'sofficial website. NoticeBoard.Accessed on 29April2025.Availableat: http://niksic.me/oglasna-tabla.

[208]MunicipalityofNikšić.Reportof the Commissionfor theAllocationofFundsfortheFinancingof NGO Projects of the Municipality of Nikšić. 2025. Accessed on 29 April 2025. Available at: http://api.niksic.me/uploads/Izvjestaj_Komisije_za_finansiranje_projekata_NVO_za_2022_godinu_6f5e96355c_ef783aeafe.pdf.

[209]MunicipalityofNikšić.Publiccallforproposalsforthefinancingofnon-governmentalorganisationprojectsfor 2023. 2023. Accessed on 29 April 2025. Available at: http://api.niksic.me/uploads/Javni_konkurs_za_nvo_431a949527.pdf.

[210] MunicipalityofNikšić.Publiccall for proposalsforthefinancingofnon-governmentalorganisationprojectsfor 2024. 2024. Accessedon29 April 2025. Available at: http://niksic.me/news/odluka-raspodjela-sredstava-nvo-24.[211] MunicipalityofNikšić.Publiccall for proposalsforthefinancingofnon-governmentalorganisationprojectsfor 2025. 2025. Accessed on 29 April 2025. Available at: http://api.niksic.me/uploads/JAVNI_KONKURS_ZA_FINANSIRANJE_PROJEKATA_NEVLADINIH_ORGANIZACIJA_ZA_2025_GODINU_e77b82dad6.docx.

[212]MunicipalityofBijelo Polje.FinalAccountoftheMunicipalityof BijeloPoljefor2025.Accessed on 12August 2025. Available at:https://www.bijelopolje.co.me/images/2025/budzet-2025-konacno.pdf.

Center for Support to Children and Families. It is not a specialised institution exclusively for women victims of violence and does not meet IC standards, as reported by GREVIO.[213]

Conclusion

Montenegro has recognised the importance of combating violence against women in line with the Istanbul Convention. Progress has been made in introducing programme budgeting, medium-term fiscal planning and elements of gender-responsive budgeting. Strategic and policy documents increasingly recognise violence against women as a priority area and include objectives related to expanding specialised services, strengthening institutional capacities and improving financing arrangements.

Despite these commitments, they are not yet consistently reflected in the budgeting framework. Although Programme 22 – Social Welfare includes activities related to domestic violence and the protection of women and children, neither the Medium-term Budget Framework nor annual budgets provide sufficiently detailed information to identify planned allocationsforspecialisedservicesforwomenvictimsofviolenceagainstwomenortomonitor their implementation. Existing budget structures therefore do not allow transparent tracking of allocations and expenditures for specialised services in accordance with the Istanbul Convention.

The only public funding that can be clearly identified and monitored is that allocated through annual public calls issued by the MSWFD. However, these calls reveal several structural shortcomings. Although they often formally refer to specialised services and the Istanbul Convention, their eligibility criteria allow participation by organisations that are not specialisedserviceproviders.Fundingremainsannual,project-basedandunpredictable,while organisations interviewed for this research reported that they were frequently requested to reducetheirproposedbudgetsbeforecontractsweresigned.Thisfinancingmodelparticularly disadvantagessmall,specialisedwomen'scivilsocietyorganisations,whichoftenrelyonthese public calls as their only source of state funding for maintaining specialised services.

At the local level, the situation is even less transparent. Municipal budgets generally do not contain dedicated budget lines for specialised services addressing VAW, while public calls are usually directed broadly towards civil society organisations rather than specialised services.MorethanhalfofMontenegro'smunicipalitiesstilldonotprovidespecialisedservices, and publicly available budget data rarely allow monitoring of allocations or expenditures.

Overall,theanalysisdemonstratesasignificantgapbetweenstrategiccommitmentsand budgeting practice. While national strategies increasingly recognise the need to strengthen specialised services and improve their financing, the current public financing framework remainsfragmented,predominantlyproject-basedandinsufficientlytransparent.Theabsence of dedicated budget lines, service-specific expenditure data and clearly identifiable medium-term budget allocations makes itdifficulttoassesswhether publicresources areadequateto ensure the availability, accessibility and continuity of specialisedservices envisaged by the Istanbul Convention and national strategic documents.

Thefindings further demonstratethatthesustainabilityof specialisedservices depends notonly on the level of public investment, butalso on the financingmodel itself. A financing frameworkbased predominantlyonannualproject grantscannot providethepredictability

[213]GREVIO.FirstthematicreportonMontenegro.2024.Paragraph120.

necessary to maintain specialised services in the long term. Sustainable service provision requires transparentandidentifiable public budgetallocations, complementedby predictable multi-year financing that enables specialised women's civil society organisations to retain qualified staff, ensure continuity of support for victims, contribute to the monitoring of institutional responses and engage in evidence-based policy development. Without such a financingframework,interruptionsinspecialisedservicesremainasignificantrisk,potentially underminingboth the continuity of support for victims andthe implementation of the state's strategic commitments.

CHAPTER2.INSUM:THECOSTSOF SPECIALISED SERVICES FOR ADDRESSING VIOLENCE AGAINST WOMEN

This chapter examines the availability, demand, financing and estimated costs of specialised services for victims of violence against women in Montenegro. It focuses on services for which costing was conducted, namely SOS helplines, counselling services and shelters, analysing institutional responsibilities, available data on beneficiaries, impact, demand for services, budget allocations, actual expenditures and projected future costs.

In addition, the chapter examines the existing policy framework, international standards, existing models and Montenegro's commitment to establish three rape crisis centres, and other specialized services, although a detailed costing of the establishment of the rape crisis centre was beyond the scope of this research. Recognising that recovery from violence extends beyond immediate protection, the chapter also discusses the importance of social housingasakeyprerequisiteforsurvivors'long-termrecovery,reintegrationandindependent living.

Finally, the chapter presents the estimated overall cost of ensuring the specialised services examined in this research and compares these costs with the overall state budget and the budget allocations of the MSWFD for transfers to NGOs, illustratingthe financial implications ofestablishingasustainablesystemofspecialisedsupportforwomenvictimsofgender-based violence.

CapacitiesforGRBSpecialisedServices

This section examines the extent to which responsible officials have the capacities to utilise GRB in planning adequate budgets for specialised services. Services Public officials responsible for budgeting services partially understand their legal obligations and how they should budget for specialised services. However, their understanding of the relevant legal framework is insufficient. Some research participants misinterpreted and lacked elementary awareness of the legal and policy framework.[214]

In addition, there is limited understanding of the importance of collecting and using sex-disaggregated data for planning violence against women related services, even though this is a clear legal requirement set by the Law on Gender Equality of Montenegro. For now, dataiscollectedadhoc,anditisnotstandardised.Thereisnosystematic,organisedapproach to collecting data on beneficiaries of services related to VAW. Sex-disaggregated data is collected for certain social welfare services (e.g. public kitchen), but not specifically for violence against women related services.

Genderequalityofficersandfinanceofficersinmunicipalitiesrarelycooperate,ifatall. Iftheycooperate,itisinsufficienttoensurethatfinancialandgenderaspectsareadequately

[214]ResearchersinterviewedsevenWCSOrepresentativesandtwo financialandgender equalityofficers from different municipalities.

considered during budget processes. An interviewed gender equality officer said that he/she is not included in budget processes at all; rather, the Secretary of the Secretariat of Social Welfare drafts the budget and sends it to the Secretariat for Finance, where all budget proposalsarecollected.Insufficientinteractionbetweengenderequalityofficers,socialservice providersandfinanceofficersduringthebudgetdraftingprocesscancontributetoinaccurate estimations of costs affiliated with offering specialised services.

Although steps have been taken towards implementing GRB, the necessary preconditions for its effective and systematic implementation are not fully met. Even though the normative framework and budget preparation tools have been introduced, SAI has assessed that significant gaps exist in monitoring and evaluating indicators in the MTBF and strategicplansremainweak.[215]Budgetaryunitsstilldonotconductregularbudgetanalysisor ensurethatdata is disaggregated by sexas obligedby theLaw on Gender Equality.Thelack of accurate data inhibits GRB for specialised services.

SOSHelpline

According to IC Article 24, states are to establish appropriate support services for victims of gender-based violence, including helplines, which should be available 24/7. Helplines should be confidential, free of charge and accessible for all survivors, providing immediate assistance and information about available services and legal options. In Montenegro, this service is provided by WCSOs.

Responsibilities

The Law on Social and Child Protection of Montenegro regulates SOS helplines as a social support service.[216] Montenegro does not have a single specialised, state-led service providing social support and services to women experiencing gender-based violence. CSWs, as public institutions, are responsible for offering general social support services and protection. Montenegrin law also recognises that social support services and protection can be provided by private entities and organisations.[217] As already noted, all specialised SOS helplines in Montenegro are operated by WCSOs. Currently, three licensed SOS helplines provide specialised support to women: the national SOS helpline for victims of domestic violenceandaspecialisedSOS helplinefor victimsof forcedmarriage,both located in Nikšić, and one SOS helpline in Plužine.

Inaddition,sevenWCSOsprovideSOShelplineservicesatthelocallevelbutarenotlicensed forthisspecificservice.TheseorganisationsoperateinPlav,Podgorica(threeorganisations), Ulcinj,BijeloPoljeandBerane.Somearelicensedtoprovidecounsellingservices,whileothers are not formally licensed but have long been recognised within their local communities as trusted providers of specialised support for women experiencing violence. They employ qualified and trained professionals, provide survivor-centred and trauma-informed support, andmanyrelypredominantlyonvoluntarywork.However,duetothelack ofsustainableand continuousfunding,theyareunabletomeetallofthestaffingandorganisationalrequirements necessary for obtaining a licence for SOS helpline services.

[215]TheStateAudit InstitutionReport ontheEffectivenessoftheImplementationofGRBinMontenegro.2023.

[216]LawonSocialandChildProtection.Article119inrelationtoArticle63.

[217]LawonSocialandChildProtection.Article119.

Regarding the institutions responsible for budgeting, within each Ministry in Montenegro there are dedicated financial departments responsible for submitting budgetary datato theMinistryofFinance,specificallytotheBudgetDirectorate,whichconsolidatesthis information.Similarly, at thelocallevel, allrelevant entitiessubmit their financial data to the Secretariat for Finance, where comprehensive budget planning is conducted. At the central level,theresponsibleauthorityforbudgetingisMSWFD,whileatthelocallevelthisishandled by local Secretariats for Social Welfare.

DataonBeneficiaries andImpacts

TheLawonGenderEqualityofMontenegrostatesthatthe"statisticalinformationand information which are being collected, recorded, and processed in both public bodies and companies, as well as other commercial and legal entities must be disaggregated presented by sex".[218] Sex-disaggregated data are released inconsistently and sporadically, making it difficult to track trends and inform evidence-based policymaking. As for the specialised services, publicly available data are limited to shelter beneficiaries, namely the number of women andchildrensupportedeach year. Otherexistingexamples of the sex-disaggregated datacollectionarelimitedtocertainmunicipalsupportservices,suchaspublickitchens,where municipalities collect sex-disaggregated data on beneficiaries. Overall, awareness among responsible institutions of the importance of systematically and transparently collecting, analysing, and publishing sex-disaggregated data remains limited.Meanwhile, general awareness among officials on the importance of collecting this data and disaggregating it based on sex or gender is concerningly low.

In contrast, WCSOs providing specialised services maintain detailed beneficiary records, routinely collecting sex and age-disaggregated data. Most WCSOs providing this servicecollectdataonbeneficiariesofservices,disaggregatedbysexandage.WCSOscollect someinformationregardingbeneficiaries'placeofresidenceandethnicityifwomensharethis informationorgrantpermissionfordatacollection.Collectingsuchdataismoredifficultwhen services are provided via phone, particularly anonymous phone calls, on SOS helplines. A researchparticipantobservedthechallengeofcollectingdataonethnicity,whichmayonlybe sharedifbeneficiariesopenlydiscussit.WCSOstendedtostorebeneficiaries'dataonprivate laptops, secured and not connected to the internet.

MSWFD's annual reports publish statistical data in total figures. The 2024 report presentsdataonthenumberofpeoplewhosoughthelpthroughtheSOShelpline,thenumber of calls received, the number of services provided, as well as the type of service provided, including(information,confidentialconversations,psychologicalcounselling,legalcounselling, mediation, urgent interventions and referrals, requests for accommodation and accompanimentbyaconfidentialperson).Sex-disaggregateddatacollectedandpublishedby thecompetentinstitutionsarereleasedinanunsystematic,inconsistent,andsporadicmanner, hindering monitoring, trend analysis, and evidence-based policymaking.As for the publicly availabledataconcerningthebeneficiariesofspecialisedservices,theonlysex-disaggregated data available refers to shelters, showing the number of women and children assisted annually.

[218]LawonGender EqualityofMontenegro. Article14.

DemandforSOSServices

According to available data, the National SOS helpline receives between 2,300 and 2,400 calls annually. On a monthly basis receives between 190 and 200 calls, averaging 6-7 calls daily.[219]

Table16.PastandAnticipatedBeneficiariesofSOSServices

Year	#of beneficiaries (state)	#ofbeneficiaries known/services provided	# women	# children	# men
2022	Actual#	324	276	27	23
2023	Actual#	373	335	25	33
2024	Actual#	409	338	37	34
2025	Actual#	373	325	29	19
2026	Forecasted#	370[220]	319	30	27
2027	Forecasted#	370	319	30	27
2028	Forecasted#	370	319	30	27

Table16indicatesaconsistentlyhighdemandforthenational SOShelpline.Thetotal number of beneficiaries increased from 324 in 2022 to 409 in 2024, before declining slightly to 373 in 2025. Forecasts for the following years anticipate a relatively stable demand of approximately370beneficiariesannually.Womenconsistentlyaccountedforthevastmajority of beneficiaries, which is expected given that domestic violence is gender-based and predominantly affects women and girls. Interviewed WCSOs observed that violence against womenhasbecomemorevisibleduetowomen'sincreasedempowermentandwillingnessto reportviolence,aswellasthesupportprovidedbyWCSOsandshelters.Whilesomeresearch participants considered that violence always has existed but is now more visible, others pointed to the emergence and increase of new forms of violence, particularly cyber, psychological and sexual violence. One organisation also reported an increase in violence against older women, especially after the COVID-19 pandemic.

Although Montenegro has established a relatively solid legal framework, interviewed organisations emphasised that inconsistent implementation continues to undermine the effectivenessofprotectionmechanisms.Consequently,mostWCSOsdonotexpectareduction in either violence or the number of service users in the coming years. Based on previous trends and interviews conducted for this research, the state should plan sustainable and potentially increased funding for SOS helpline services in accordance with the existing and expected level of demand.

BudgetandExpenditures2022-2025

MSWFDisresponsibleforbudgetingforandimplementingthebudgetlinefortheSOS helpline at the central level, while municipalities are responsible for financing their organisational units and social welfare. However, specific budget lines and exact allocations forSOShelplinesinaccordancewithICstandardarenotpubliclyavailable.Thelackofbudget

[219]Press. "Morethan3,500 womenandchildrenseek helpannually".2025.Accessedon10August2025. Available at: https://press.co.me/vise-od-3-500-zena-i-djece-godisnje-zatrazi-pomoc/.

[220]Forecasts for 2026–2028arebased onthe average numberof beneficiaries recordedduring the period 2022–2025

datapublishedinstatebudgetssuggeststhatthesegovernmentbodieshavenotusedcosting as a basis for estimating budget allocations for this service. No such costing has been publishedandGovernmentofficialsdidnotrespondtoWRCrequestsforinformation.WCSOs involved in providing these services stated that they have not been consulted on needed budget allocations for this service.

As noted, public calls for SOS services do not explicitlyspecify that they are intended for specialised services, nor exclusively for violence against women services. Nevertheless, through these public calls the Ministry allocated €40,000 in 2022, €39,998 in 2023, €40,000 in2024and€45,000in2025forSOShelplineservicesforabusedadultsandelderlypersons. Although the Ministry presents these allocations in its annual reports as financing for the National SOS Helpline, the funds are not allocated directly to that organisation/service, but ratherthroughpubliccallsforwhichotherNGOsalsomayapply.Otherorganisationsdidapply during some years covered by this research; however, the National SOS Helpline remained theonlyapplicantwithcompletedocumentationandthereforetheonlyorganisationreceiving funding. This situation may change in the future, which could result in the available funds beingdistributedamongseveralorganisations.Atthesametime,localSOShelplinesgenerally do not apply for these public calls because they do not meet the prescribed licensing requirements and therefore mostly rely on broader calls related to counselling services.

Although Montenegro is obliged under the Istanbul Convention to ensure adequate and sustainable funding for a national 24/7 SOS helpline, this research found that public fundingcovers less then50%of theactual costs requiredtooperate theservice.GREVIO,in its First Thematic Evaluation Report on Montenegro (2024), welcomed the existence of a national SOS helpline available 24/7 and accessible in additional languages, including Albanian,UkrainianandRussian,whilenotingthatthestatefinancesonlypartoftheservice, despitetheobligationundertheICtoensureadequateandsustainablefinancialresourcesfor services provided by public authorities and civil society organisations.

Meanwhile,smallerlocalSOShelplinesgenerallydonotapplyforthesefundsbecause they do not meet the licensing requirements prescribed by the public call. According to interviewees, many local SOS services are unable to obtain licences due to unstable and project-based financing, which prevents them from ensuring continuous salaries for professional staff, one of the key licensing requirements. Instead, these non-licensed organisations apply for broader public calls intended for a wide range of NGOs and projects, where funding is significantly less predictable and usually insufficient to ensure sustainable service provision.

NospecificfundsforSOShelplinesareforeseenwithintheMTBFfortheperiod2026–2029. Based on previous allocations, it may be expected that the MSWFD will continue allocating approximately up to €50,000 annually through public calls. At the same time, available budget documentation does not allow monitoring of whether the amounts planned by the Ministry for SOS helpline services were actually allocated and spent as intended. Nor does it provide sufficiently detailed expenditure breakdowns within the Ministry's budget. Consequently, it is not possible to assess spending gaps, under-spending or the relationship between allocated funds and service quality or outcomes.

Further, amounts in calls arenot determinedbasedon service providers' (NGOs) real needs or consultations with NGOs. Rather, the state decides on the amount to be allocated basedonitspriorityareas.Forexample,dataonthewebsiteoftheMunicipalityofNikšićshow that public calls for allocating funds to WCSOs in the previous period were in priority areas such as women's entrepreneurship, sports, spatial and urban planning, agriculture and rural development.Violenceagainstwomenwasnotincludedinthelistofprioritiestobesupported. Problematically,laws,strategiesandAPsdonotobligethestatetospendacertainamountof funds on SOS services each year.

Costs

Thissectionseekstorespondtothesecondmainresearchquestion:whatarethe estimated costs of SOS services, including for supporting WCSO service providers, for 2026-2029.Thisaimstoprovidebudgetestimatesbasedonbestpracticesin GRBcosting,toinform the MSWFD future budget allocations. For this purpose, the research used a costing methodology developed for this research, which included the following categories of expenditures[221]:

- Humanresourceexpensesincludesalariesfortrainedandqualifiedpersonnel,support staffandcontractedexperts,suchaslawyers,psychologists,operators,administrators andpersons of trust. These positions are essentialfor the effective managementand deliveryofservices,ensuringcomprehensivecareandsupportforbeneficiaries.These positions must be consistently funded regardless of the number of clients treated because they always must be available. To ensure quality services, salary levels for those working in SOS helplines should not be lower than for persons employed in similarpositionswithsimilarqualifications.Affiliatedcostssuchascontinuoustraining and certification, psychotherapy and/or supervision for staff also must be included to reduce burnout and enhance wellbeing, improving the overall quality of services provided.
- Communication costs are needed for outreach, awareness-raising and encouraging persons to report violence in line with the IC.
- Equipmentlikephones,laptops,projectors,securitycamerasandvehiclesarerequired for operations.
- Operational costs include essential daily expenses like rent, utilities (i.e., electricity, water, internet and telephone services), transportation and fuel costs, stationery, cleaning materials, bank fees, taxes including for vehicles and annual audit costs.

Costing must consider trends in prior beneficiaries, as well as beneficiaries that require services that have not been provided in the past, such as due to lack of access. It must consider existingservices,as well as services thatdonotyet existbutshouldexistaccording to the IC.

The total cost of the SOS service is calculated by aggregating **personnel costs** and **operational costs** required for its continuous operation, using current market prices. Personnel costs include monthly salaries (includingtaxes and benefits) for key staff involved in delivering the SOS service, such as the project coordinator, multiple SOS operators (includinganoperatorfortheAlbanianlanguage),apsychologist,alawyer,anadministrator, and a confidential support person, all calculated over a 12-month period. Operational costs cover essential expenses that enable day-to-day functioning of the service, including communication costs, electricity, water, transport and fuel, office supplies, bank fees, database maintenance, prevention and visibility activities, and promotional activities.[222]

[221]Detailedmethodologyandsupportinginformationareprovidedin Annex 1.

[222]Detailedmethodologyandsupportinginformationareprovidedin Annex 1

Thedatafor2025wasestimatedincooperationwithanWCSOprovidingSOShelpline services,whileprojectionsfor2026,2027,2028and 2029werepreparedconsidering the Montenegro'saverageinflationratein2026predictedbytheIMF,whichamountedto3.2%.[223] The budget to be allocated through a public call in the upcoming period 2026–2029 is not yet known, however, given the long-standing trend of allocating the same amount each year, it has been estimated that the allocated funding will be approximately the same as in 2025.AsTable17indicates,theestimatedactualcostofservicesbasedoncalculationsmade according to WCSO' budgets are significantly more than the state is budgeting. To provide services in line with the IC, the state would need to budget more.

Table17.PastandAnticipatedCostsofNationalSOSHelpline

Year	ActualBudget[224]	Cost	FundingGap
2022	40,000	n/a	n/a
2023	40,000	n/a	n/a
2024	40,000	n/a	n/a
2025	45,000	100,976	**55,976**
2026	45,000	104,207	**59,207**
2027	45,000	107,542	**62,542**
2028	45,000	110,983	**65,983**
2029	45,000	114,534	**69,534**

RapeCrisisCentreandReferralCentre

According to IC Article 25, states are required to take necessary legislative or other measurestoensuretheestablishmentofappropriateandeasilyaccessiblerapecrisisorsexual violencereferralcentres.InMontenegro,theRefromAgenda,theNationalAPforMeetingthe Closing Benchmarks in Negotiation chapter 23 (Judiciary and fundamental Rights), and the National Plan for the Implementation of the IC for the period of 2023-2027 are aimed at improvingtheprotectionofvictimsofsexualviolenceandenvisagetheestablishmentofthree crisis centres in Montenegro. In accordance with the aforementionedAP, the MSWFD should undertakethis activityandbear responsibilityfor its implementation.WhiletheAPenvisaged the startof these activities in early 2026, no transparentmeasureshave been undertaken to date to implement this activity. It should also be noted that the National Plan for the Implementation of the Istanbul Convention foresees the completion of this measure by the fourth quarter of 2027.

These centres must exist in sufficient numbers to provide survivors with medical and forensic examinations, trauma support and counselling. A clear distinction should be made betweenreferralandrapecrisiscentres,includingintermsoftheirfunctionsandinstitutional organisation. Rape crisis centres may take on different organisational forms. They provide long-term support through counselling, support groups and assistance in accessing other services, including supporting victims during civil and criminal proceedings through accompaniment, advocacy and practical assistance.

On the other hand, sexual violence referral centres may specialise in providing immediate medical care, forensic examinations and crisis intervention. They are often integrated within hospitals and provide emergency medical assistance, forensic evidence collectionandreferraltospecialisedcommunity-basedorganisationsforfurther

[223] International Montetary Fund. Inflation rate, average consumer prices. Available at: https://www.imf.org/external/datamapper/PCPIPCH@WEO/OEMDC/ADVEC/WEOWORLD

[224] Allocatedbystate/municipality.

support.Referralcentresareusuallyattachedtohospitalsorotherqualifiedhealthinstitutions, particularly due to the need for urgent medical assistance and timely forensic evidence collection within the first 24-48 hours following the assault. Rape crisis centres primarily provide long-term support for victims of sexual violence, including services of counselling, accompaniment,advocacyandassistanceinaccessingotherservices.Suchservicesareeither organisedasspecialised,stand-aloneinstitutionsorintegratedwithinexistingcounsellingand support services.

Responsibilities

Montenegro currently lacks both referral centres and rape crisis centres, despite its internationalobligationsarisingfromICArticle25.[225]TheMontenegroReformAgenda(2024-2027) and Action Plan for Meeting the Closing Benchmarks in Chapter 23 both envisage the establishment of three crisis centres for victims of sexual violence, in line with GREVIO standards requiring approximately one specialised centre per 200,000 inhabitants.[226]The Agenda states that currently zero crisis centres are in place and outlines a plan to establish fully integrated health, legal and psychological support services. The Agenda envisages that the establishment of the three crisis centres in Montenegro is a sole responsibility of the MSWFD.

The new Law on Social and Child Protection recognises crisis centres for victims of sexual violence and provides a legal basis for implementation. Meanwhile, the second implementation report stated that the draft regulation was ready and undergoing inter-ministerialharmonisation.Noinformationwasprovidedontheplannedlocationsofthethree centres,orwhethertheywouldbestand-aloneinstitutionsorattachedtohospitals/counselling centres.[227] No information detailed the number and profile of specialised staff required. The next implementation should define locations, institutional model, staffing standards, training requirements,referralprotocols,accessibilitystandardsandsustainablefinancingforthethree centres.

Rape crisis centres may immediately refer victims to appropriate, specialised organisationsthatprovidethenecessarycarestatedinArticle25oftheICExplanatoryReport. Research has shown that it is good practice to carry out forensic examinations regardless of whether the matter will be reported to police, as well as to offer the possibility of having samplestakenandstoredsothatthe decisionastowhetherornottoreporttherapecanbe taken at a later date.[228]

DataonBeneficiariesandImpactsandDemandforServices

As Montenegrodoes notcurrentlyprovidetheseservices,noonehas benefittedfrom theserviceyetandimpactscannotbeassessed.Futuredemandforservicescanbeestimated basedontheICprojectionsthatatleastoneRapeCrisisCentreshouldexistperevery200,000 inhabitants. Table 19 suggests where these centres should be located based on population needsandthesurroundingareastheycouldservegeographically.Thethreecitieswherecrisis centres should be established are Podgorica, Nikšić and Bar.

[225]WRC."Theexistingservicesforrehabilitationandreintegrationof women experiencingviolencein Montenegro". 2020. 15.

[226]GREVIO. ExplanatoryreporttotheCoEIstanbulConvention.No. 210.2011. 26.

[227]GovernmentofMontenegro.SecondReportontheImplementationoftheNationalPlanfortheImplementation of the Istanbul Convention (2023–2027). 2024.

[228]Ibid.

Table19.Requi redNumberof CrisisCentresaccor dingtoIC

Municipality (By Size)	Total Population[229]	% of Montenegro's Total Population	RequiredRape Crisis Centres	Current Crisis Centres	Crisis Centres needed
Andrijevica	3910	0.63%	0.02	0	
Bar	45812	7.35%	0.23	0	1
Berane	24645	3.95%	0.12	0	
BijeloPolje	38662	6.20%	0.19	0	
Budva	27445	4.40%	0.14	0	
Cetinje	14494	2.32%	0.07	0	
Danilovgrad	18617	2.99%	0.09	0	
Gusinje	3933	0.63%	0.02	0	
HercegNovi	30824	4.94%	0.15	0	
Kolašin	6700	1.07%	0.03	0	
Kotor	22746	3.65%	0.11	0	
Mojkovac	6728	1.08%	0.03	0	
Nikšić	65705	10.54%	0.33	0	1
Petnjica	4957	0.79%	0.02	0	
Plav	9050	1.45%	0.05	0	
Plužine	2177	0.35%	0.01	0	
Pljevlja	24134	3.87%	0.12	0	
Podgorica	179505	28.78%	0.89	0	1
Rožaje	23184	3.72%	0.12	0	
Šavnik	1569	0.25%	0.01	0	
Tivat	16338	2.62%	0.08	0	
Tuzi	12979	2.08%	0.06	0	
Ulcinj	20507	3.29%	0.1	0	
Zeta	16071	2.58%	0.08	0	
Žabljak	2941	0.47%	0.01	0	
TOTAL	**623633**	**100.00%**	**3.12**	**0**	**3**

Costs

For the purposes of this research, no costing exercise was undertaken for rape crisis centres, as the legal and operational framework for these services has not yet been established in Montenegro. In particular, the bylaws regulating their organisation, staffing, service standards and operational requirements are still to be adopted, making it impossible topreparereliablecostestimate.Instead,theexamplespresentedbelowidentifypromising institutional models and propose possible organisational arrangements for Montenegro that couldserveasthebasisforfuturecostingandbudgetplanningoncethenecessarysecondary

[229] Accessed on 10 August 2025. Available at: https://www.monstat.org/uploads/files/popis%202021/saopstenja/SAOPSTENJE_Popis%20stanovnistva%202023%20I_cg.pdf.

legislationhasbeenadopted.Thesemodelsalsoillustratetheimportanceofensuringintegrated, trauma-informed and victim-centred support for victims of sexual violence.

Belgian "One-stop" Model

ForMontenegro,possiblythemostappropriatemodelwouldbean **adapted Belgian "one-stop" model**,organisedthroughthreeregionalcrisiscentres,asalreadyenvisagedby the**Montenegro Reform Agenda 2024–2027** and the**Action Plan for Meeting the Closing Benchmarks in Chapter 23**.

In Belgium, medical examinations and forensic examinations, including evidence collection, are provided within the same crisis centre. Belgian **Sexual Assault Centres** are organised as integrated, hospital-based "one-stop" services. They are physically located in hospitals and provide free 24/7 support to victims of sexual violence.[230] These centres are staffed by specially trained professionals, including forensic nurses, doctors, psychologists, coordinators and administrative staff. Police officers also have designated space within the centretotakeastatementifthevictimdecidesto reporttheviolence.Themodelisbasedon cooperation between three key partners: hospitals, police and prosecution services, while nationalcoordinationisprovidedbytheBelgianInstituteforthe EqualityofWomenandMen. The services provided include emergency medical care, treatment of injuries, medical examination, emergency contraception, testing and treatment for sexually transmitted infections, HIV risk assessment, hepatitis prophylaxis and other health interventions. The forensic component includes documentation of injuries and collection of evidence from the victim's body or clothing. Psychological support includes crisis intervention, information on common traumareactions after sexual violence and the possibility of follow-up consultations with a clinical psychologist. The centres also provide follow-up care, including medical and psychological monitoring and referral to legal and other psychosocial services.

A key feature of the Belgian model is that reporting to the police is **not a precondition** for receiving assistance. Victims can first receive medical, psychological and forensicsupport,whileevidencemaybestoredfor adefinedperiod,allowingthem todecide later whether to report the case. This is particularly important because many victims are not readytoreportimmediately,whileforensicevidenceneedstobecollectedassoonaspossible.
Therefore, the Belgian model combines the functions of both a **sexual violence referral centre** anda**rapecrisiscentre**.Itoperatesasareferralcentrebecauseitprovidesurgent medical andforensic care, evidence collection and linkswith police andprosecutionservices. Atthesametime,itincludeselementsofarapecrisiscentrebecauseitprovidespsychological support, follow-up, case management and referral to longer-term assistance.

TheBelgianmodelcanbedescribedasadesirableimplementationmodelof an**integrated hospital-based sexual violence centre**, where urgent medical and forensicinterventionisdirectlyconnectedwithpsychologicalsupportandaccesstothejustice system. Its main added value is that victims can receive comprehensive, coordinated and victim-centred support in one place, reducing secondary victimisation and improving access to protection, evidence collection and long-term recovery.

Notably, the **Swedish and Austrian models** are also provided inside health institutions. In Sweden, emergency support for adult victims of sexual violence is primarily organised through hospital-based specialist services, such as the Emergency Clinic for Rape Victims at Södersjukhuset/Region Stockholm,[231] where medical and forensic examinations, treatment, counselling and follow-up are provided within the healthcare system. Police reportingandquestioningremainseparatepolice/prosecutorialfunctions:ifthevictimreports

[230] See: https://www.icrhb.org/en/projects/the-belgian-sexual-assault-care-centres-from-piloting-to-evaluation.

[231] Available at: https://www.sodersjukhuset.se/avdelningar-och-mottagningar-sos/akutmottagningar/akutmottagningen-for-valdtagna-patientinformationemergency-clinic-for-rape-victims-in-other-languages/

the case, the police may collect the forensic kit and relevant documentation from the clinic. Meanwhile, Austria has developed clinical-forensic outpatient services (Gewaltambulanzen) linkedtomedicaluniversities,hospitalsandforensicmedicine.Theirprimarygoalistoprovide confidential,unbureaucraticexaminationsandsecureevidencethatcanbeusedinacourtof law. Services include confidential documentation of injuries, forensic evidence preservation andmedicalsupport,oftenindependentofanimmediatepolicereport.However,theyremain clinical-forensicserviceswithinorattachedtothe healthandforensicmedicinesystem,while police questioning remains a police/prosecutorial procedure.

TheAustrianBAFÖmodel

TheAustrianBAFÖmodelprovidesarelevantexampleofspecialisednon-hospitalrape crisis support.[232] BAFÖ is a nationwide network of autonomous women's counselling centres specialised in addressing sexual violence, with a specialised service available in each of Austria'sninefederalprovinces.Theservicesareconfidential,freeofchargeandmaybeused regardless of whether the sexual violence occurred recently or many years earlier. They include crisis support, information, psychosocial counselling, counselling on reporting to the police,accompanimenttothepolice,psychosocialandlegalcourtaccompaniment,supportin finding psychotherapy, counselling for support persons and professionals, prevention, awareness-raising and professional networking.

This model is importantfor Montenegrobecauseitshows thatlonger-term rapecrisis supportcan be providedoutside hospitals by specialisedwomen's counsellingservices, while urgent medical and forensic functions remain attached to qualified health and forensic institutions.

Montenegro'sModelforRapeCrisisandSexualViolenceReferralCentres

Similar to the Austrian BAFÖ model, Montenegro should develop a two-pillar model thatincludesbothhospital-basedsexualviolencereferralmechanismsforurgentmedicaland forensiccareandspecialisedrapecrisiscounsellingandsupportservices,preferablyoperated by or in close cooperation with specialised WCSOs, providing confidential, free, trauma-informedandlong-termsupporttovictims.Thiswillbuildonandutilisetheexistingexpertise among WCSOs. These centres should not be developed only as formal new services but as functionalregionalmechanismscombining(1)**hospital-basedurgentreferral services**and(2)**longer-termrapecrisissupport**,asdetailedinthefollowingsubsections.

Hospital-basedUrgentReferralServices

The urgent medical andforensic component shouldbe attached to health institutions (suchastheClinicalCentreofMontenegroorotherrelevanthealthinstitutionsforthecentral region andnorthern andsouthernregions,respectively). Theyshouldensure separate space that safeguards victims' privacy; available staff specifically trained to work with victims of sexualviolence,includingtrauma-informedmedicalexamination,forensicevidencecollection, risk assessment, crisis intervention, informed consent, confidentiality and prevention of secondary victimisation; and referral to specialised psychological, legal and social support services. This would ensure timely medical examinations, forensic evidence collection, emergencycontraception,treatmentofinjuries,preventionofsexuallytransmittedinfections, secure evidence storage and immediate crisis intervention. The state also must invest in specialised training, supervision and retention of forensic nurses, doctors, clinical psychologists, trauma counsellors, legal advisers, case managers, police officers and prosecutors. This is particularly important because existing evidence shows that victim-centred, trauma-informed and gender-sensitive approaches remain insufficiently integrated

[232] Availableat:https://www.sexuellegewalt.at

intoinstitutionalpracticeinMontenegro,whilespecialisedsupport,accompanimentand continuity of assistance are crucial for victims' safety, trust and access to justice.

Longer-termRapeCrisisSupport

All crisis supportmustnotbehospital-based.Alongsidethe hospital-attachedmedical andforensicreferralcomponent,Montenegroshouldestablishseparatespecialisedrapecrisis centres or safe crisis accommodation units for short-term accommodation and intensive supportforvictimsofsexualviolence.[233]Thesecentresshouldprovideimmediatesafety,24/7 reception, short-term stay where the victim cannot safely return home, crisis counselling, trauma-informed psychological first aid, legal information, accompaniment to police, prosecution, courts, health institutions and CSWs, safety planning, case management and referral to longer-term psychosocial and legal support. They should be victim-centred, confidential,accessibletowomen and girls from all municipalities andavailableregardless of whether the victim decides to report the violence immediately.

Such short-term crisis accommodation should be clearly distinguished from the medical-forensic referral function. The collection of forensic evidence, medical examination, emergency contraception, treatment of injuries and prevention of sexually transmitted infectionsshouldremainattachedtohealthinstitutionswithtrainedforensicandmedicalstaff. Theseparaterapecrisis accommodation/supportcentres shouldfunction as specialised, safe and non-medical spaces for stabilisation, protection, counselling, accompaniment and recovery, preferably operated by or in close cooperation with specialised WCSOs and sustainably funded by the state. This combined model would allow Montenegro to meet the need for urgent forensic and medical response while also ensuring that victims have a safe place to stay and receive continuous specialised support after the immediate examination.

In smaller municipalities, where stand-alone rape crisis institutions may not be immediately accessible, formal protocols can be established with existing specialised WCSOs and counselling providers, or other qualified providers, depending on local capacity and licensing.Theseservicesalsomustbesustainablyfinanced,regulatedandlinkedtohospitals, police, prosecution, courts and CSWs.

IntegratingtheBarnahusModelintoMontenegro'sResponsetoSexualViolence

The Barnahus model (pioneered in Iceland and adapted to two well-established Barnahus models, in Sweden and Norway), integrates social welfare and the justice system so the child's needsremain the priority.[234] As aninstitutionalidea, the aimof themodelis to improve society's handling of violence and abuse against children in a holistic manner. The Barnahus idea has been based on a strong victim orientation from the start, with the fundamental aim of avoiding"secondary victimisation"of childrenin thehandlingof violence and/orsexualabusecases.Thisavoidanceisideallyenabledthroughinter-agencyandmulti-professional collaboration and coordination in a child-friendly atmosphere.[235] However, this model should not be presented as a general adult rape crisis centre model.

[233]ThisisplannedbytheActionPlanforChapter23andtheReformAgenda.

[234]JohanssonS.,andStefansen,K."Policy-makingforthediffusionofsocialinnovations:thecaseoftheBarnahus modelintheNordicregion andthebroader Europeancontext."TheEuropeanJournalof Social ScienceResearch, 33(1).2020.4–20.

[235]Johansson, S., Stefansen, K., Bakketeig, E., & Kaldal, A. "Implementing the Nordic Barnahus Model: Characteristics and LocalAdaptions. InCollaboratingAgainst ChildAbuse: Exploring the Nordic Barnahus Model." 2017. 1–31

Montenegro officially announced[236] the introduction of the Barnahus model for child victims andwitnessesofsexualviolence,abuseandexploitationwithsupportfromUNICEF,[237]CoE[238] andthe EU. Recent legislative amendments also envisage the establishment of an institution for the protection of children, adults and older persons from sexual violence.[239]

Forchildren,MontenegroshouldpreservethecoreBarnahusprinciples:achild-friendly environment, specialised forensic interviewing, multidisciplinary case assessment, trauma-informed support, protection from repeated questioning and strong safeguards against secondary victimisation.

Foradultvictims,thesupportmodelshouldbebasedonautonomy,informedconsent, confidentiality, access to support regardless of whether the victim reports the violence and the possibility to receive medical, forensic, psychological, legal and social support through coordinated referral pathways. For older victims, the model should also include accessibility measures, assessment of dependency and care-related risks, protection from coercion or family pressure,supportfor persons withdisabilities or cognitivedifficulties andcoordination with health, social care and adult protection services.

Therefore,theBarnahusmodelshouldbetreatedasthechild-specificcomponentofa broader multidisciplinaryresponsesystem,whileadultandolder victims shouldbesupported through adapted sexual violence referral services, rape crisis support and safe short-term accommodation.

This means thattheBarnahus-typeapproachshouldfunction as thecoordinationand child-friendly access point, while the crisis support component should include separate specialised rape crisis services and safe short-term accommodation units, providing 24/7 reception, immediate safety, crisis counselling, psychological first aid, legal information, accompaniment, safety planning, case management and referral to longer-term support.

Therefore,MontenegroshouldnottreatBarnahus,sexualviolencereferralcentresand rape crisis centres as competing models. Instead, it should develop:

- Barnahus/child-friendlyservicesforchildren;
- hospital-attachedmedicalandforensicreferralservicesforadultvictimsofsexual violence; and third,
- specialisedrapecrisisandshort-termsafeaccommodationservicesforadultsandolder victims, preferably operated by or in close cooperation with specialised WCSOs.

ThiswouldallowthestatetomeettheReformAgendacommitmenttoestablishthreeregional crisiscentres,whileensuringthatservicesare age-appropriate,trauma-informed,accessible, confidential and compliant with IC standards.

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[236]GovernmentofMontenegro. "AccordingtotheBarnahusmodel, Montenegrowillestablishits ownChildren's House for child victims of violence". 17. 2024. Available at: https://www.gov.me/clanak/po-modelu-barnahus-crna-gora-ce-imati-svoju-djeciju-kucu-za-djecu-zrtve-nasilja?

[237]UNICEFMontenegro."MontenegrointroducestheBarnahusmodel".2024. Link:https://www.unicef.org/montenegro/en/stories/montenegro-introduces-barnahus-model.

[238] See: https://www.coe.int/en/web/podgorica/-/montenegro-to-introduce-barnahus-model-to-support-child-survivors-and-witnesses-of-violence-abuse-and-sexual-exploitation

[239]GovernmentofMontenegro. "TheGovernment adopted theDraftLawonAmendments totheLawonSocial and Child Protection". 2026. Available at: https://www.gov.me/clanak/vlada-usvojila-predlog-zakona-o-izmjenama-i-dopunama-zakona-o-socijalnoj-i-djecjoj-zastiti, https://wapi.gov.me/download/24053ae8-44cc-4a01-8d75-8284a76b694c?version=1.0.

Shelters

AccordingtoICArticle23,statesshalltakenecessarylegislativeorothermeasuresto ensure the establishment of appropriate and easily accessible shelters, available in sufficient numberstoprovidesafeaccommodationandtoproactivelyreachsurvivors,especiallywomen andtheir children. The responsibleinstitution remainsMSWFD, while shelters aremostly run and operated by the WCSOs.

Responsibilities

The Law onSocial andChildProtectionrecognisesshelter accommodation as asocial service for victims of violence, to be provided by licensed service providers. The primary responsibilityfor financingsocial andchildprotection services lies withtheState throughthe central budget, while municipalities may finance and provide additional services, including shelters, through their local budgets. Where municipalities are unable to secure adequate funding for specialised services, the State is required to participate in their financing.[240]

AccordingtotheMSWFDAnnualReportfor2024,sevensheltersforvictimsofviolence operateinMontenegro[241].However,notallofthesearespecialisedsheltersforwomenvictims of gender-based violence. The shelter in Bijelo Polje is a public institution providing support to children andfamilies andis notspecialisedforwomen victims of violence. In addition, the Crisis Centre in Podgorica, established as a short-term shelter for women victims of gender-based violence, ceased operating in 2024 due to insufficient funding.

Although the secondarylegislation governing the licensing of social services does not recognise specialised services in accordance with the IC, the Register of licensed service providers maintained by the MSWFD indicates that four shelters are licensed to provide accommodation to "adult persons - women with children who are victims of abuse, neglect, gender-based violence, domestic violence and exploitation, or who are at risk of becoming victims": two in Bar, one in Podgorica and one in Nikšić.[242]

DataonBeneficiariesandImpactsandDemandforService

Regarding current shelter places, WCSO Lea Bar has 14 beds for women victims of gender-based violence, WCSO System has 16 beds,[243] WCSO Women's Safe House has 17 beds,andWCSOSOSNKshelterhas20beds forwomenvictimsofgender-basedviolence.[244] The number of beds is determined in accordance with the available spatial capacity, as well as other technical and staffing requirements prescribed for shelter licensing in Montenegro.

AccordingtotheIC,sheltersforvictimsofviolenceagainstwomenshouldbeavailable in every region of the country, ensuring that one "family place" is available for every 10,000 inhabitants,withtheactualnumberofbedsbasedonrealneeds.InMontenegro,thereare

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[240]LawonSocialandChildProtectionMontenegro.Article 154.

[241]AnnualReportMSWFD.2024. 41.

[242]GovernmentofMontenegro.Registryofthelicensedprovidersof services for September2025.Availableat: https://data.gov.me/dataset/registar-licenciranih-pruzalaca-usluga-septembar-2025.

[243]MSWFD.Registerofthelicensedserviceproviders.2026.Availableat: https://www.google.com/url?q=https://www.gov.me/dokumenta/db04fddb-9677-4862-88fa-adff7d8e106a&sa=D&source=docs&ust=1781812842629870&usg=AOvVaw1iyWGWuTOI7XzTSYNNYGCO[24]

[4]Register of Licensed Service Providers. 2025. At: https://www.google.com/url?q=https://data.gov.me/dataset/registar-licenciranih-pruzalaca-usluga-septembar-2025&sa=D&source=docs&ust=1780411975044738&usg=AOvVaw2ggeJE5pWTBaBs0XXliebt.

currently five shelters providing such services, with a total accommodation capacity of 67 beds. However, this is not enough if, in accordance with the IC, the calculation is based on "family places"[245] rather than the number of beds. The state does not meet the requirement of having a shelter in each region, given that the shelter located in the northern part of the countryisnotspecialisedforwomenvictimsofgender-basedviolence,butisinsteadasupport centre for children and families, where male victims of trafficking are also frequently accommodated.

The Table 20 presents the currently available specialised shelter places in Montenegro and identifiesthemunicipalitieswhereadditionalsheltercapacityisrequired.Itusesthestandard of a family place, as defined by the IC, which is not equivalent to one shelter place or one bed, but rather reflects the average size of a family requiring accommodation. As noted in GREVIO's 2022 Baseline Evaluation Report on Norway, a family place "requires a bed space for the mother and the average number of children in the country."[246]

For the purposes of this research, data were requested from MONSTAT on the average number of children under the age of 18 in families with children. According to MONSTAT, thesefamilieshaveanaverageof1.8children.Consequently,onefamilyplacewascalculated as threebeds:onefor themother andtwofor herchildren.Tofacilitatecomparison withthe official data published by the MSWFD, which are presented in the number of beds, the table belowincludesboththeestimatednumberoffamilyplacesandthecorrespondingnumberof beds.

Table20.RequiredNumberofShelterFamilyPlacesaccordingto IC

Municipality	Total Population	% of Montenegro's Total Population	Required Family Places	Required Places (beds)	Current Family Places	Current Places (beds)	Family Places Needed	Places (beds) Needed
Andrijevica	3,910	0.63%	0.4	1	0	0	0	1
Bar	45,812	7.35%	4.6	14	10	30	-5	-16
Berane	24,645	3.95%	2.5	7	0	0	2	7
BijeloPolje	38,662	6.20%	3.9	12	0	0	4	12
Budva	27,445	4.40%	2.7	8	0	0	3	8
Cetinje	14,494	2.32%	1.4	4	0	0	1	4

[245]A"familyplace"requiresabedspaceforthemotherandtheaveragenumberofchildreninthe country.
[246]GREVIO.BaselineevaluationreportonNorway.2022.

Danilovgrad	18,617	2.99%	1.9	6	0	0	2	6
Gusinje	3,933	0.63%	0.4	1	0	0	0	1
HercegNovi	30,824	4.94%	3.1	9	0	0	3	9
Kolašin	6,700	1.07%	0.7	2	0	0	1	2
Kotor	22,746	3.65%	2.3	7	0	0	2	7
Mojkovac	6,728	1.08%	0.7	2	0	0	1	2
Nikšić	65,705	10.54%	6.6	20	7	20	0	0
Petnjica	4,957	0.79%	0.5	1	0	0	0	1
Plav	9,050	1.45%	0.9	3	0	0	1	3
Plužine	2,177	0.35%	0.2	1	0	0	0	1
Pljevlja	24,134	3.87%	2.4	7	0	0	2	7
Podgorica	179,505	28.78%	18.0	54	6	17	12	37
Rožaje	23,184	3.72%	2.3	7	0	0	2	7
Šavnik	1,569	0.25%	0.2	0	0	0	0	0
Tivat	16,338	2.62%	1.6	5	0	0	2	5
Tuzi	12,979	2.08%	1.3	4	0	0	1	4
Ulcinj	20,507	3.29%	2.1	6	0	0	2	6
Zeta	16071	2.58%	1.6	5	0	0	2	5
Žabljak	2,941	0.47%	0.3	1	0	0	0	1
TOTAL	**623,633**	**100.00%**	**62.4**	**187**	**22**	**67**	**40**	**120**

Thedata presentedabove demonstratethat Montenegrodoes notcurrentlymeetthe sheltercapacitystandardsetbytheICwhencalculatedonthebasisofavailablefamilyplaces rather than individual beds. While the existing shelters provide 67 beds, this corresponds to only22familyplaces,whereasapproximately62familyplaces(or187beds)wouldberequired based on Montenegro's population. This means that Montenegro currently lacks around 40 family places, equivalent to approximately 120 additional beds.

The analysis also highlights significant geographical disparities in the availability of shelterservices.Thegreatestgapexistsinthenorthernregion,whereapproximately22family places(66beds)arerequiredbutnospecialisedshelterforwomenvictimsof violenceagainst women currently exists. A specialised shelter should therefore be established to serve the northern municipalities. In the central region, the largest accommodation deficit is recorded in Podgorica, where an additional 12 family places (37 beds) are required. By contrast, the existing shelter in Bar exceeds the municipality's minimum accommodation requirements by approximately five family places (16 beds). However, because of its geographical location at the southern end of the coast, it cannot ensure practical accessibility for women from the westerncoastalmunicipalities,particularlyHercegNovi,Kotor,TivatandBudva.Thefindings therefore suggest that future planning of shelter capacity should take into account not only population-based standards but also the geographical accessibility of specialised services, in order to ensure equal access for women across all parts of the country.

Theestimatedneedforadditionalsheltercapacityisfurthersupportedbydataonthe useofshelterservices,whichindicateaconsistentlyhighdemandforaccommodation.During the observed period, the two longest-established shelters in Podgorica and Nikšić accommodated between 51 and 95, and between 61 and 72 beneficiaries per year, respectively,while thenewly establishedshelterin Barrecordeda rapidincrease in demand, fromeightbeneficiariesduringitsfirstmonthsofoperationin2024to21beneficiariesin2025.

However, according to interviewees, these figures do not fully reflect the actual demand for shelter services. Women oftenremainin shelters for prolonged periods,in some cases for up to one year, even after they no longer require emergency protection, because theyareunabletosecuresafeandsustainablehousingafterleavingtheshelter.Thisislargely due to the lack of transitional housing, limited access to social housing and the economic insecurity of many victims, who are frequently financially dependent on the perpetrator or otherwise unable to afford independent accommodation. As a result, shelter places remain occupied for longer, limiting shelters' ability to admit new beneficiaries. Service providers further reported that, when no places are available, women are referred to shelters in other municipalities. Many decline such referrals because relocation wouldrequire their children to change schools or kindergartens, while others are unable to relocate due to employment or other family responsibilities. Consequently, the recorded number of beneficiaries is likely to underestimate the actual demand for specialised shelter services in Montenegro.

BudgetandExpenditures

Specificbudgetlinesandpreciseamountsallocatedforspecialisedshelterservicesare notpubliclyavailable.Theonlypublicisedspecificdataonfundingforshelterservicesisfrom public calls published by MSWFD and municipalities.

In 2022, €100,000 was allocated for shelters for victims of violence through a public call issued by MSWFD.[247] This amount was distributed between two shelters. In the same year, among the 12 organisations that received a total of €300,000 following the Public Call for the Protection Against Violence Against Women and Domestic Violence, €31,991 was allocated for a shelter for women who experienced gender-based violence.Most of these resourcesweredirectedtowardsprojectsfocusedonprevention,awareness-raising,

[247]MSWFD. Decision on Financing the Service of Accommodation in a Shelter for a Child, Adult and Elderly Person,oranAdult withachild, whoisa victimofabuse, neglect, gender-basedviolence, anddomesticviolence for 2022.Available at:
https://www.gov.me/clanak/odluka-o-finansiranju-usluge-smjestaja-u-prihvatilistu

counselling, rehabilitation, empowerment and institutional support for victims of violence against women and domestic violence and not for shelters.[248] In 2023, the Ministry allocated €99,928 for shelters. In 2024, the amount was €200,000 for shelter accommodation, distributed among four WCSOs leading shelters, which effectively meant that the amount per shelter remained unchanged (approximately €50,000 each). In 2025, this increased to €500,000 for financing shelter services for victims of abuse, neglect, violence against women and domestic violence. Again, it was distributed among four shelters. As stated, these public calls were not intended exclusively for specialised services but were broader in scope, in line with the legislation governing service licensing. Public calls have not been designed based on an assessment of costs or conclusions drawn from consultations with WCSO survivors. Thus, they have not complied with real specialised service needs.

Although funding for shelters increased significantly in 2025 compared to previous years, service providers still perceive this support as uncertain and unsustainable. Shelter providers currently have relatively more stable funding than other specialised service providers, given that the total amount allocated through public calls has substantially increased and that shelters additionally receive a compensation per beneficiary. While the MSFWD still has not established an official cost of services based on a detailed needs and cost analysis, interviews with research participants affiliated with shelters indicated that, when a woman and her children are accommodated in a shelter (regardless of whether the survivor contacted the shelter directly or was referred by the CSW), the CSW is notified and issues a placement decision. Based on this decision, the organisation providing the service receives a payment of €350 per month per beneficiary. These funds are paid based on decisions issued by the CSW and form part of the Ministry's budget. However, it is not possible to determine from publicly available data which Ministry budget line these funds are allocated from, nor the total amount allocated for this purpose. For the purposes of this research, information on these payments was obtained directly from the organisations participating in the study.

Despite these improvements, providers emphasised that financing remains unstable because budget allocations are determined without consultations with service providers, funding decisions are made on an annual basis and contracts are signed yearly. In addition, the methodology used by the Ministry to distribute the total amount allocated for shelters among individual organisations remains unclear. While organisations do not receive equal amounts of funding, neither publicly available information nor the experience of interviewed service providers provides a clear explanation of how individual allocations are determined. Concerns regarding sustainability are further intensified in a context of frequent changes among decision-makers, making long-term planning and retention of qualified staff particularly difficult. These concerns regarding sustainability are evidenced by the example of the short-term shelter for women victims of gender-based violence, which had been licensed but was closed after one year due to insufficient funding.

As previously noted, for most municipalities it is not possible to determine from publicly available data whether funds are allocated for specialised services for women victims of violence at all. However, where funding is allocated, public institutions providing shelter services appear to be in a significantly more favourable position than specialised WCSOs. This can be illustrated by comparing the northern municipality of Bijelo Polje and the southern municipality of Bar.

[248] MLSW. Decision on the Allocation of Funds for the Financing of Non-Governmental Organisation Projects in the Field of Protection against Violence against Women and Domestic Violence for 2022. Available at: https://www.gov.me/clanak/odluka-o-raspodjeli-sredstava-za-finasiranje-projekata-nevladinih-organizacija.

In Bijelo Polje, the Municipality allocated between €142,000 in 2022 and €210,000 in 2025 annually to the Public Institution Centre for Support to Children and Families. This institution includes a shelter component with only four beds and is not a specialised service exclusively for women victims of violence. As confirmed by GREVIO, it does not meet IC standards. In contrast, in Bar the local government allocated €11,000 in 2024 and slightly over €12,000 in 2025 to an organisation providing a specialised shelter service for women victims of violence with a capacity of 14 beds, which necessarily entails significantly higher operational andstaffingcosts.This examplesupports thefindings of this researchthatfunds allocated by the Ministry for specialised shelters remain insufficient for ensuring sustainable, adequate service provision in line with the needs of beneficiaries and IC standards.

Costs

Thecostspresentedinthefollowingtablesrefertotheimplementationandfunctioning of the service for providing accommodation in a shelter for women victims of violence and their children. They include several categories of expenditures necessary for the continuous and effective delivery of this service. A significantportion of the budget relates to personnel costs,includingsalaries,taxesandbenefitsforstaffinvolvedinshelteroperations(supervision andcontinuoustraining),includingthedirector,servicecoordinator,financemanager,lawyer, psychologist,socialworker,medicalstaff,childcaregiversandadriver.Inaddition,projections includeoperationalexpensesrequiredforthedailyfunctioningoftheshelter,suchasrentand maintenanceofpremises,utilities(electricity,water,heatingandinternet),aswellasvehicle-related costs and maintenance. They also cover expenses related to equipment, safety and securitymeasuresandotheroperationalneedsnecessarytoensuresafeaccommodationand adequateprofessionalsupportforwomenvictimsofviolenceandtheirchildren.Costestimates were developed in communication with WCSOs, aiming for the most realistic assessment of actual costs of providing the service.[249]

For the purposes of this research, the column "Budget (State Funding)" includes all public funding received by each shelter from the state and/or municipalities, including allocations awarded through public calls and payments made by the MSWFD on the basis of placement decisions issued by CSW (€350 per beneficiary per month). These figures were verified directly with the participating organisations.

The column "Actual Cost (Overall Budget)" represents the estimated annual budget required for the sustainable provision of the service, including all personnel, operational and programmecostsnecessarytodelivertheserviceinaccordancewithapplicablestandardsand currentmarketprices.Theseestimatesweredevelopedbytheresearchersincooperationwith the participating organisations, based on a detailed review of staffing needs, operational requirements and budget structures. Detailed budget breakdowns for each shelter are presented in the Annexes.

The "Funding Gap" represents the difference between the estimated annual budget requiredto provide the service andthe public fundingreceived. The analysisfurther showed thatthese fundinggaps are frequentlynotfully coveredthrough additional funding. Instead, manyorganisationscontinueprovidingservicesbyadaptingtheiroperationstotheresources available, often relying on voluntary work, unpaid overtime and other internal cost-saving measures, so that women and children do not experience any reduction in the availability or quality of services.

[249]Detailedmethodologyandsupportinginformationareprovidedin Annex 2, 3 and 4

The amount that the shelter in Podgorica receives annually from MSWFD covers only approximatelyhalf of its real costs of operatingthe service. Projections for the period 2026–2029 were prepared taking into account Montenegro's average inflation rate for 2026, as forecast by the IMF at 3.2%.

Table21.PastandAnticipatedCostsofLongTermShelterCentralRegion-Podgorica

Year	Budget(State Funding)	ActualCost(Overall Budget)	FundingGap	# of Beneficiaries
2022	n/a	n/a	n/a	95[250]
2023	n/a	n/a	n/a	54[251]
2024	n/a	n/a	n/a	59[252]
2025	157,000[253]	301,010	**144,010**	51[254]
2026	168,000[255]	320,500	**152,500**	60[256]
2027	170,000	340,800	**170,800**	64[257]
2028	170,000	354,432	**184,432**	64
2029	170,000	365,773	**195,773**	64

The shelter in Nikšić has not received sufficient funding. In some years it covered only approximately one-third of its actual operational expenses. Table 22 shows projections for future years. Projections for the period 2026–2029 were prepared taking into account Montenegro's average inflation rate for 2026, as forecast by the IMF at 3.2%.

Table22.PastandAnticipatedCostsofLongTermShelterCentralRegion-Nikšić

Year	Budget(State Funding)	Actual Cost (OverallBudget)	FundingGap	# of Beneficiaries
2022	121,136	302,840	**181,704**	62[258]
2023	178,020	356,040	**178,020**	70[259]
2024	133,050	385,560	**252,510**	72[260]
2025	272,461	391,630	**119,169**	61[261]

[250] 38 women, 57 children. Available at: https://www.google.com/url?q=http://szk.co.me/wp-content/uploads/2023/02/Izvjestaj-o-radu-2022.-godina-final.pdf&sa=D&source=docs&ust=1781898615681180&usg=AOvVaw38yQhUFOktWDWtlkOkD9Z6[25]

[1] 21 women, 33 children. Available at: https://www.google.com/url?q=http://szk.co.me/wp-content/uploads/2024/02/Godi%25C5%25A1nji-izvje%25C5%25A1taj-o-radu-2023.-godina-S%25C5%25BDK.pdf&sa=D&source=docs&ust=1781898615681337&usg=AOvVaw3gFlsBo4R6wpBS-cQxOmlp

[252] 21 women, 38 children. Available at: http://szk.co.me/wp-content/uploads/2025/02/GODI%C5%A0NJI-IZVJE%C5%A0TAJ-2024.konacan.pdf

[253]125,000percalland32,000perbeneficiaryprovidedbystate

[254] 27women,24children.Availableat:https://www.google.com/url?q=http://szk.co.me/wp-content/uploads/2025/02/GODI%25C5%25A0NJI-IZVJE%25C5%25A0TAJ-2024.konacan.pdf&sa=D&source=docs&ust=1781898615681457&usg=AOvVaw0JI0jMXYp1k-Mxg_3pO_jf

[255]128,000 percallandaround40,000perbeneficiaryprovidedby state(projectionuntiltheendof2026)

[256]The forecastfor 2026isbasedonservice utilisationduringthe firsthalfofthe year. ByJune2026,the shelter had already recorded 45 beneficiaries,compared with 51 beneficiaries during the whole 2025, indicating that the annual number of beneficiaries is likely to exceed that of the previous year.

[257]Forecasts for 2027–2029arebased onthe average numberof beneficiaries recordedduring the period 2022–2026

[258]28women,14girls,20boys.

[259]33women,21girls,16boys.

[260]37women,16girls,19boys.

[261]33women,28children.

2026	312,816	446,880	**134,064**	66[262]
2027	325,542	465,060	**139,518**	66[263]
2028	341,208	487,440	**146,232**	66
2029	341,208	503,038	**161,830**	66

The shelter in Bar is relatively new. In the previous period, all funds were secured through projects and were intended for project activities rather than for shelter services for womenvictimsofviolenceandtheirchildren.Projectionsfor2026,2027,2028and2029were preparedconsideringMontenegro'saverageinflationratein2026predictedbytheIMF,which amounted to 3.2%.

Table23.PastandAnticipatedCostsofLongTermShelterSouthernRegion -Bar[264]

Year	Budget(State Funding)	ActualCost(Overall Budget)	FundingGap	# of Beneficiaries
2022	n/a	n/a	n/a	n/a
2023	n/a	n/a	n/a	n/a
2024	17,150	49,248	**32,098**	8[265]
2025	19,460	203,428	**183,968**	21[266]
2026	100,000[267]	209,938	**109,938**	25[268]
2027	105,000[269]	216,656	**111,656**	23[270]
2028	105,000	223,589	**118,589**	23
2029	105,000	230,744	**125,744**	23

It is important to note that during the period 2022–2026, the allocation of funds throughthepubliccallforshelteraccommodationserviceslackedsufficienttransparency.The official funding decisions only presented the total amount distributed among a number of organizations, without specifyingthe individual amounts allocatedto each organization. As a result, it was not possible to determine how much funding each service provider received. Furthermore,aninterviewconductedwithoneoftheWCSOconfirmedthatthedistributionof funds was unequal and that no clear evidence existed for determining allocated amounts.

Thisresearchalsoexaminedtheexampleoftheshort-termshelterforwomenvictims of violence that was closed after less than two years due to lack of funding. Although this shelter is no longer operational, researchers considered it important to include it in the analysis, as it illustrates how relatively limited financial resources were required to maintain such an important specialised service. As a research participant explained:

[262]The forecastfor2026isbasedonthe service utilisationtrendobservedduringthefirsthalfofthe year.

[263]Forecasts for 2027–2029arebased onthe average numberof beneficiaries recordedduring the period 2022–2026

[264]The shelterwasopenedinmid-2024.

[265]3 women,4girls,1 boy.

[266]10women,11children.

[267]75,000percallandaround25,000per beneficiaryprovidedbystate(projectionuntiltheendof2026)

[268]ProjectionprovidedbyemployeeswithintheWCSOindicatingthattherewillbemoreuserscomparedto previous year and the trend so far in 2026

[269]The forecast for2026isbasedontheserviceutilisationtrendobservedduringthefirsthalfoftheyear.

[270]Forecasts for 2027–2029 are based on the average number of beneficiaries recorded in 2025 and 2026. The 2024datawereexcludedfromthecalculationbecausethesheltercommencedoperationsinthesecondhalfofthe year.

"ThecrisiscenterwasopenedwithIPAfundsmanagedbytheMinistryofFinanceand supported by MLSW with part of the equipment donated by OSCE. Initial funding of about 40,000 euros covered only nine months of staff salaries and rent. When additional funds were requested to ensure continuity, the application was rejected. Despite this, the shelter operated voluntarily for about a year to support clients but eventuallyhadtocloseduetolackof regular fundingandresources for staffsalaries. An approximate estimated cost of the service is 90,000 euros per year.[271]"

During the interview, the research participant further clarified that the application for additional funding,aimedatensuringthecontinuity of serviceprovision,has beensubmitted to the MSWFD.

Table24.PastCostsofShortTermShelterCentralRegion–Podgorica

Year	Budget(State Funding)[272]	Actual Cost (OverallBudget)	FundingGap	# of Beneficiaries
2022	7,050	62,540	**55,490**	0
2023	44,480	63,352	**18,872**	15[273]
2024	n/a	n/a	n/a	6[274]
2025	n/a	n/a	n/a	n/a
2026	n/a	n/a	n/a	n/a
2027	n/a	n/a	n/a	n/a
2028	n/a	n/a	n/a	n/a

Amongtheshelters operatingin Montenegro, onlyonehad providedsupportservices towomenwithdisabilities,accommodatingtwoorthreesuchcasestodate.Allothershelters stated that they had never accommodated a woman with a disability who was a survivor of violence,nor hadtheyreceivedany official requests for shelter accommodationfromwomen with disabilities. This finding highlights the need for greater attention, outreach and empowermenteffortsaimedatensuringaccesstoprotectionandsupportservicesforwomen with disabilities. As well, one shelter representative noted that, although plans have been made to improve physical accessibility through infrastructural adaptations, significant challengesremainregardingstaffcapacityandpreparednesstosupportwomenwithdifferent types and levels of disability. This suggests that, in addition to accessible facilities, shelters requirespecialisedtrainingandadditionalresourcestoprovideadequateandinclusivesupport to all women victims of violence.

CounsellingServices

The IC requires parties to ensure specialist support services for women victims of gender-basedviolence.Counsellingservices areoneof thekey components of suchsupport, complementing shelters, SOS helplines and other specialised services.

Responsibilities

[271]InterviewwithanNGOformerlyrunningashort-termshelter.

[272]The Budgetrepresents funds allocatedonly by the stateormunicipality,asdonorcontributions areintended for project-related activities rather than for the service itself.

[273]7 women,3girls,5 boys.

[274]4 women,2girls.

In Montenegro, counselling services for women victims of violence are primarily provided through specialised services run by WCSOs. These services include psychosocial support, psychological counselling, support in communication with institutions and accompaniment by a confidential person throughout proceedings before institutions, in line with the IC and the Law on Protection from Domestic Violence. Some organisations,such as WRC,alsoprovidepsychotherapyservicesandstrategiclegalrepresentation.InMontenegro, MSFWDholdstheprimaryresponsibilityoffinancingandlicensingcounsellingservicesoffered to women victims of gender-based violence. Importantly, under the existing licensing regulations, counselling is not classified as a specialized service. Yet, a number of organisations have been identified as providers of this service, irrespective of their licensing status.

As a service, counseling is regulated by the Law on Social and Child Protection of Montenegro. However, counseling as a form of psychosocial support is directly linked to providing service and supporting rights to mental health. Concerning this, the Law on the Health Protection of Montenegro does not recognise any specialised mental health services for victims of VAW. It does not recognise these victims as a particular vulnerable category. Generalhealthprotectionservices,includingmentalhealthservices,shouldbeprovidedtoall citizens, regardless of their sex, gender identity, sexual orientation or any other personal determination.[275] However, relevant institutions in Montenegro do not always guarantee an adequate understanding of violence against women and trauma, which can sometimes lead to re-traumatisation of women victims of violence. This further highlights the importance of specialised services provided by WCSOs. In practice, these services are uniquely placed to providetrauma-informedpsychologicalcounsellingandpsychotherapytailoredtothespecific needs of women victims of gender-based violence. Their approach is based on an understanding of the dynamics and consequences of violence against women and aims to avoidsecondaryvictimisationwhilesupportingvictims'recovery,empowermentandlong-term reintegration.

DataonBeneficiariesandImpactandDemandforCounselingServices

Ofthe12WCSOscurrentlyprovidingcounsellingservices,fivearelicensed(inBerane, Nikšić, Rožaje and two in Podgorica), while seven organisations providing these services are not yet licensed (in Berane, Herceg Novi, Plav, Podgorica, Tuzi and Ulcinj). In Montenegro, WCSOs play a key role in providing specialised services because they offer comprehensive, survivor-centredandmultidisciplinarysupporttailoredtothespecificneedsofwomenvictims of gender-basedviolence,ensuringcontinuityof assistancethroughoutvictims' recovery and reintegration.

The data collected for the purposes of this research also demonstrate a consistently high demand for specialized counselling services. The three organisations included in the costing analysis alone provided counselling and psychosocial support to between approximately430and610womenannuallyduringtheobservedperiod.Thesefiguresrelate onlytotheorganisationsparticipatinginthisresearchandthereforedonotreflecttheoverall number of women receiving counselling services from all specialised WCSOs in Montenegro.

[275] TheLawonHealthProtection. "Official GazetteofMontenegro. No.3/2016, 39/2016,2/2017, 44/2018, 24/2019 - other laws, 82/2020 and 8/2021". Articles 1 and 4 in relation to Article 5.

Counselling services are also the most geographically accessible specialised service, with WCSOs providing this type of support in all three regions of Montenegro. In many organisations, counselling is delivered alongside other specialised services, such as SOS helplines, legal aid, psychotherapy and shelter services, enabling women to access comprehensiveandcontinuoussupportwithinthesameorganisation.However,whileseveral organisationsinthecentralregionhavecomparativelymorestablefunding,mostcounselling providersinthenorthernandsouthernregionscontinuetooperatewithverylimitedfinancial resources. As a result, they rely heavily on project-based funding, voluntary work and donor support to maintain the continuity of services, which affects both the sustainability of the service and its long-term availability to women victims of gender-based violence.

BudgetandExpenditures

When it comes to state financing, counselling services are in the relatively disadvantagedpositionamongspecialisedservices.TheMSWFDdoesnotpublishadedicated public call for financing counselling services for women victims of gender-based violence. Instead, organisations providing these services compete for funding through broader public callsopentoawiderangeoforganisations,manyofwhichdonotprovidespecialisedservices for women victims of gender-based violence. In 2022 and 2023, the total amount allocated throughthesecallswas€300,000annually.In2024,theavailablefundingwasreducedto €172,803, and in 2025 to €170,000. During the same period, the number of supported organisationsincreasedfrom12(in2022)to14(in2024and2025),whilethemaximumgrant amount per project was reduced from €40,000 (in 2022–2023) to €15,000 (from 2024 onwards). Consequently, the amount available to individual specialized service providers decreasedsignificantly,leavingcounsellingservicesheavilydependentondonorfunding.The public funding framework is discussed in greater detail in the previous chapter.

Anillustrativeexampleoftheextenttowhichtheimportanceandoperationalrealities of these services are overlookedby MSWFD can be foundin a statementmade by a Ministry representativeduringthe session of the"Women's Parliament"heldon 6 March2024,ahead of International Women'sDay.[276] In responseto apreviouslysubmittedquestion on whether theMinistryplannedtoconductacostinganalysisforcounsellingservices,therepresentative stated that experts hadbeen engagedto develop a costingmethodologyforfiveservicesfor children. According to that methodology, the hourly cost per beneficiary for counselling services amounted to €2.68. A WCSO representative responded that, according to this methodology,ifonequalifiedprofessionalworkerprovidedservicestoeight beneficiariesper day, every working day of the month, the total monthly income generated would amount to €471.68. This is significantly below the gross minimum salary for a person with a university degreeinMontenegro,withoutevenconsideringallotheroperationalandservice-relatedcosts necessary for maintaining such a specialised service.

Until political commitment to combating violence against women genuinely strengthens, these services will continue to function primarily through volunteer work, and the support of foreign donors.

Costs

[276]ParliamentofMontenegro.The SixteenthSessionoftheWomen'sParliament.(2:25:54- 2:32:19) Available at: https://www.youtube.com/watch?reload=9&v=VQgT1T3fem4&t=2s.

Table 25 presents an estimate of the annual budget required to provide specialised support services delivered by WRC to women victims of violence, including counselling, psychologicalsupportandfreelegalaid.Aswiththepreviousspecialisedservicesanalysedin thisreport,thecolumn"Budget(StateFunding)"includesallpublicfundingreceivedfromthe state and/or local government. The column "Actual Cost (Overall Budget)" represents the estimated annual budget required for the sustainable provision of the service, including all personnel, operational, programme and equipment costs, calculated on the basis of current market prices. The "Funding Gap" represents the difference between the estimated budget required to provide the service and the public funding received. The table also includes the number of beneficiaries, illustrating that differences in the estimated costs among organisations providingthe same type ofservice are largely driven by differences in demand and, consequently, by the staffing and operational capacities required to respond to that demand. Detailed budget breakdowns are presented in the Annexes.[277]

Projections for 2026, 2027, 2028 and 2029 for the overall budget were prepared consideringtheMontenegro'saverageinflationratein2026predictedbyIMF,whichamounted to 3.2%.

Table25.PastandAnticipatedCostsofCounsellingService-WRC(CentralRegion)

Year	Budget(State Funding)	ActualCost(Overall Budget)	FundingGap	# of Beneficiaries
2022	2,650	122,896	**120,246**	297
2023	9,211	122,974	**113,763**	221
2024	6,562	138,403	**131,841**	237
2025	0	148,476	**148,476**	261
2026	0	153,227	**153,227**	270[278]
2027	3,685	158,130	**154,445**	257[279]
2028	3,685	163,190	**159,505**	257
2029	3,685	168,412	**164,727**	257

Table26showsanestimateoftheactualresourcesneededtoprovidesupportservices towomenvictimsofviolenceforanotherorganizationinthecentralregion.Unliketheexample in the previous table, this sample organisation does not provide free legal aid services but only counselling and psychological support. The secured budget also covers only about half of the actual costs of providing these services. Again, the actual budget secured consists largely of donor funding, while a significantly smaller portion is provided by the state. Projectionsfor 2026, 2027, 2028 and2029 for theoverall budget were preparedconsidering the Montenegro's average inflation rate in 2026 predictedby IMF, which amountedto 3.2%.

Table2 6.PastandAnticipated CostsofCounsellingservices -PGSOS(C entralRegion)

Year	Budget(State Funding)[280]	ActualCost(Overall Budget)	FundingGap	# of Beneficiaries
2022	26,502	65,346	**38,844**	103
2023	0	64,986	**64,986**	117
2024	3,636	84,738	**81,102**	125
2025	12,172	99,084	**86,912**	154

[277]Detailedmethodologyandsupportinginformationareprovidedin Annex5

[278]The2026figureisprojectedbasedonthenumberofbeneficiariesrecordedsofarthisyear

[279]Forecasts for 2027–2029arebased onthe average numberof beneficiaries recordedduring the period 2022–2026

[280]Providedbythestate

2026	10,578	102,254	**91,676**	150[281]
2027	10,578	105,526	**94,948**	130[282]
2028	10,578	108,903	**98,325**	130
2029	10,578	112,388	**101,810**	130

Table 27 presents an estimate of the costs for the counselling service located in a northernmunicipalityofthecountry.Theorganisationdoesnotreceivefundingforspecialised services from the central or local level government. Instead, all funds received have been allocated to specific project activities. Cost estimates for previous years were prepared in cooperationwiththeWCSO.Projectionsfor2026,2027,2028and2029fortheoverallbudget werepreparedconsideringtheMontenegro'saverageinflationratein2026predictedbyIMF, which amounted to 3.2%.

Table27.PastandAnticipatedCostsofCounsellingService -SOSBijeloPolje(Northern Region)

Year	Budget(State Funding)[283]	ActualCost(Overall Budget)	FundingGap	# of Beneficiaries
2022	0	50,221	**50,221**	89
2023	2,719	42,423	**39,704**	118
2024	19,684	54,643	**34,959**	75
2025	0	95,498	**95,498**	84
2026	0	98,554	**98,554**	80[284]
2027	4,481	101,708	**97,227**	89[285]
2028	4,481	104,962	**100,481**	89
2029	4,481	108,321	**103,840**	89

As illustrated in the previous tables, state funding for these services has been highly variable andunpredictable, makingit difficult to estimate future government allocations with anydegreeofcertainty.Forthepurposesofthisresearch,theprojectionsfortheperiod2026–2029 are therefore based on the average level of funding allocated during the period 2022–2025.

SocialHousing

As for social housing, the IC stipulates that all the member states "shall take the necessary legislative or other measures to ensure that victims have access to services facilitating their recovery from violence."[286] These general support services also include housing, as one of the crucial measures for the beneficiary's rehabilitation andreintegration. InMontenegro,MSWFDretainsprimaryresponsibilityforensuringtheprovisionofthisservice.

[281]The2026figureisprojectedbasedonthenumberofbeneficiariesrecordedsofarthisyear

[282]Forecasts for 2027–2029arebased onthe average numberof beneficiaries recordedduring the period 2022–2026

[283]Allocatedbystate/municipality.

[284]The2026figureisprojectedbasedonthenumberofbeneficiariesrecordedsofarthisyear

[285]Forecasts for 2027–2029arebased onthe average numberof beneficiaries recordedduring the period 2022–2026

[286]Council of Europe Convention on preventing and combating vilence against women and domestic violence.(Istanbul Convention). Article 20. 2011.

Moreover, there is no specialised social housing for victims ofviolence against womenbut rather available for various categories of beneficiaries.

The right to social housing can be granted to individuals who do not own a home or liveininadequatehousingandcannotaffordone.[287]ThisrightappliestoMontenegrincitizens withpermanentresidenceinMontenegro,as wellas toforeigners andstateless persons with a regulated legal status under the law or international agreements. The Law also defines groups to be prioritised when allocating social housing: single parents or guardians, persons withdisabilities,individualsovertheageof67,youthformerlywithout parentalcare,families with children with developmental disabilities, Roma and Egyptians, displaced persons, internally displacedpersons from Kosovo residingin Montenegro, foreigners with permanent ortemporaryresidencewhowererecognisedasdisplacedorinternallydisplacedpersonsand victims of domestic violence.[288] Although theLaw recognises victims of domesticviolence as a priority group for the allocation of social housing, this right is not available to all women who have experienced gender-based violence. Furthermore, no publicly available data exist onhowmanywomenhavebeengrantedsocialhousingonthegroundsofhavingexperienced gender-based violence.

Social housing remains one of the most challenging issues that women victims of violence against women face after they leave shelters. Research participants affiliated with shelter service providers reported that access to social housing is often limited, while proceduresfor obtainingthisright are lengthy andrarelyresult in timely accommodation. As a consequence, women are frequently forced to remain in shelters for extended periods, sometimesforuptoayear:notbecausetheycontinuetorequiresheltersservices,butbecause they have nosafehousingalternative. Accordingto the research participantstatements, this reduces the availability of shelter places for newly identified victims in need of immediate protection and, in some cases, contributes to women returning to violent environments because of their financial dependence, lack of adequate housing and support.

Aswell,researchparticipantsidentifiedtransitionalhousingasaparticularlyimportant missing element of the social support system. They suggested that municipalities could provideanumberofapartmentsintendedfor temporaryaccommodationofwomenandtheir children after leaving shelters, allowing them to stabilise their living conditions and achieve financial independence before moving to permanent housing. Such a model would facilitate victims' rehabilitation and reintegration while at the same time increasing the availability of shelter places for women requiring emergency accommodation.

In Montenegro, a similar transitional housing model was initiated through a MemorandumofCooperationbetweentheWRCandtheCapitalCityofPodgoricaconcerning the use of an apartment for WRC beneficiaries who are victims of violence. This initiative reflects the recognised need for safe transitional accommodation for women who no longer require shelter placement but still need housing support, specialised assistance and time to stabilise their lives after experiencing violence. However, its implementation has been hindered by frequent changes in local government and a lack of institutional continuity.

The findings of this research indicate that transitional housing should complement, rather than replace, the state's obligation to provide sustainable social housing. While municipalities and the state should ensure publicly funded and institutionally guaranteed housingsolutions,specialisedWCSOs couldplayakeyroleinprovidingprofessional support,

[287]TheLawonSocialHousing.("OfficialGazetteMontenegro",No.35/2013).

[288]Ibid.Article3inrelationtoArticle4.

counselling, case management and reintegration assistance. Establishing formal and sustainable transitional housing schemes across municipalities or regional centres would provide women with the time and support needed to achieve independent living, while also increasing the availability of shelter places for victims requiring immediate protection. The costs of maintaining and expanding such housing schemes should be assessed annually by municipalities as part of gender-responsive budgeting.

Conclusion:TotalCosts

ThischapterdemonstratesthatMontenegrostilldoesnotensuresustainable,transparent andgender-responsivefinancingofspecialisedservicesforvictimsofviolenceagainstwomen inlinewiththeIC.Althoughcertainimprovementsarevisible,particularlyregardingincreased allocations for shelters in 2025, financing of specialised services remains predominantly project-based, short-term and highly dependent on foreign donors.

Public institutions responsible for budgeting still lack sufficient understanding of GRB and the legal obligations arising from the IC and national legislation. Cooperation between genderequalityofficers,financedepartmentsandserviceprovidersremainsweak,whilesex-disaggregateddataonbeneficiariesofspecialisedservicesarestillnotsystematicallycollected or publicly available. The absence of reliable and standardised data significantly limits evidence-based planning and costing of services.

The research further shows that publicly available budget documentation does not allow clear tracking of allocations and expenditures for specialised services. Specific budget linesforspecialisedservicesinaccordancewithICstandardslargelydonotexist,whilefunding ismostlydistributedthroughbroadpubliccallsthatarenotintendedexclusivelyforspecialised women's services. Consequently, specialised WCSOs compete for limited funds with organisations that do not primarily provide support to women victims of violence or that implement only general project activities.

Amongspecialisedservices,counsellingservicesappeartobeinthemostunfavourable position,astherearenodedicatedpubliccallsfortheirfinancing,eventhough theseservices provide essential psychosocial support, psychological counselling, accompaniment through institutionalproceduresandotherformsoflong-termsupportrequiredbyvictims.Atthesame time, SOS helplines and shelters continue operating with significant funding gaps between actual operational costs and state allocations. This is particularly concerning given the continuouslyhighdemandfortheseservicesandexpectationsthatthenumberofbeneficiaries will remain stable or increase in coming years.

Theresearch additionally confirms thatfinancingmodels basedon annual publiccalls do not provide sustainability or legal certainty for service providers. Organisations are not consultedduringbudget planningprocesses,whileannual contracts andfrequentchanges in decision-makers make long-term planning, staff retention and service continuity extremely difficult. The closure of the short-term shelter for women victims of violence after less than twoyearsduetolackoffundingillustratestheconsequencesofsuchanapproachparticularly clearly.

Finally, the chapter demonstrates that Montenegro still lacks key specialised services required under the IC, particularly rape crisis centres and referral centres, while existing mental health and social protection systems remain insufficiently specialised and trauma informed. Until political commitment to combating violence against women genuinely strengthens, specialised services for women victims of violence in Montenegro will continue tofunctionlargelyduetothesupportofforeigndonorsratherthanthroughsustainablestate financing.

Findings presented throughout this chapter additionally demonstrate the significant discrepancybetweentheactualoperationalcostsofspecialisedservicesandthelevelof

funding currently ensured by the state. To illustrate the scale of resources required for sustainable service provision in line with the IC, Table 27 presents estimated costs for specialised services covered by this research. It provides an overview of projected costs for services covered by this research, namely shelters, SOS helplines and counselling and therapeutic services.

Regardingthetotalcostofthe**SOShelpline,** itisimportanttoemphasisethatthisis an estimated cost for the national SOS helpline.

Regarding the projected total costs for **shelter services**, the research sample included three shelters: two from the central region and one from the southern region. The total annual cost for the state related to the shelter was estimated by first calculating the average annual cost among the three organizations included in the research sample. This averagecostwasthenmultipliedbyfour,reflectingthetotalnumberoforganizationscurrently licensed to provide this type of service in Montenegro. Therefore, the national-level cost estimate represents the projected annual expenditure for all specialized service providers in the country based on the average cost observed in the sample.

The total annual cost of **counselling services** was estimated based on the average costreportedbythethreeorganisationsincludedinthesample.Thisaverageannualcostwas then multiplied by 12, representing the number of organisations currently providing this serviceinMontenegro,inordertoestimatetheoverallnational-levelcostofserviceprovision.

Table27.BudgetForecast

Service per IC	Institution Responsible	Budget line(# name)	AmounttobeBudgeted			
			2026	2027	2028	2029
SOS Helpline	MSWFD	No specific budgetline	104,207	107,542	110,983	114,534
Shelters	MSWFD	No specific budgetline	1,303,091	1,363,355	1,420,615	1,466,073
Counselling services	MSWFD/Municipalities	No specific budgetline	1,416,140	1,461,456	1,508,220	1,556,484
Totalcost		No specific budgetline	**2,823,438**	**2,G32,353**	**3,03G,818**	**3,137,0G1**

Taking into account that Montenegro's budget for 2026[289] is planned at EUR 3.79 billion and that the projected cost for specialized services (accommodation, SOS support, and counselling) amounts to EUR 2.82 million, it can easily be concluded that the allocation the state would need to make is notably low, representing only 0.07% of the total budget.

Ontheotherhand,thisexpenditurewouldaccountfor0,17%ofthefundsallocatedunder 42-TransfersforSocialProtectionand43-TransferstoInstitutions,Individuals,NGOs,and thePublicSector(1,66billion) for2026,whichalsodoesnotrepresentasignificantfinancial burden.As theresearchhas shown,this level of fundingwouldenablespecializedservices in Montenegrotobeprovidedinamuchhigher-qualitymannerandinlinewiththerequirements of the Istanbul Convention.

[289] Proposal for the Law on Budget of Montenegro for 2026. 2025. Available at: https://www.google.com/url?q=https://wapi.gov.me/download-preview/421218bd-1939-482e-bafd-58cf45dd3f03?version%3D1.0&sa=D&source=docs&ust=1781951402112864&usg=AOvVaw33Ub1oKnRCDU2kq2Swjv52

Montenegro's budget is estimated to be 4,62 billion in 2027 and 3,89 billion in 2028. Thiswouldmeanthat,inthecomingyears,theshareofspecializedservicesinthetotalbudget would amount to 0.06% in 2027 and 0.08% in 2028.

It should also be noted that, under Reform Step 4.4.1.2 of Montenegro's Reform Agenda,theGovernmentcommittedtoexpandingthenetworkofspecialisedservicesthrough the establishment of three Crisis Centres for victims of sexual violence, in addition to developing the Unified Database on Domestic Violence. The Reform Agenda defines this commitment as follows:

> "TheUniqueDatabaseonDomesticViolenceincludesatleast95%ofdomestic violence cases reported to the police or to the social welfare offices; ***Montenegro delivers onthe GREVIO/IC recommendations to put in placethree crisis centres forvictims of sexualviolence*** in line with the standards outlined in the Convention (i.e. integrated health, legal and psychological services for victims)."

The total estimated value of this reform step is EUR 2,317,185.60, covering both the establishment of the unified database on domestic violence and establishment of the three crisis centres. The initial deadline for completing this reform step was the end of 2025.

RECOMMENDATIONS

- **Amend the Law ontheBudgetand Fiscal Policy** of Montenegro to**obligeGRB as mandatory.**
- **Amend the Law on Social and Child Protection** of Montenegro to formally **recognisespecialisedservices**forwomenvictimsofgender-basedviolence,along with accompanying regulations governing the licensing and operation of these services.
- **Establish a system to track and publicly disclose budget allocations for gender equality** to enable monitoring of progress in line with SDG 5.c.1.
- **Secure sustainable, long-term and transparent central-level funding** implemented though specialised budget lines for specialised services for women victims of violence as recommended also in the latest GREVIO report.
- **Strengthen institutional capacities for applying GRB and costing methodologies** when planning, financing and evaluating specialised services for women victims of gender-based violence.
- **Institutionalise local coordination mechanisms** by guaranteeing and legally or administratively requiring regular multidisciplinary meetings and urgent case conferences in high-risk cases. These mechanisms should include CSWs, police, prosecution,healthinstitutions,municipalitiesandspecialisedWCSOs.Thestateand/or municipalities should cover the costs of periodic coordination meetings, including meeting space, coordination, documentation, secure data management, travel costs where necessary and participation of specialised WCSOs. Coordination should not depend on donor projects, informal contacts or individual commitment. It should become a regular, funded part of the protection system.
- **Ensure close coordination between gender equality officers, social service providers(includingNGOswheretheyprovideservices)andfinanceofficers** during the budget drafting process to facilitate more accurate estimations of costs affiliated with offering specialised services.
- **Establishdedicatedbudgetlinesforeachspecialisedservicerequiredunder the IC** (SOS helplines, specialised shelters, counselling services and rape crisis centres), enabling transparent monitoring of annual allocations and expenditures.
- **Developandadoptofficialnationalcostingmethodologiesforallspecialised services** for women victims of gender-based violence, using and further developing the costing methodology proposed in this research in consultation with specialised WCSOs and relevant public institutions.
- **Ensure the systematic participation of specialised WCSOs** and other relevant stakeholders in the **planning, costing and budgeting** of specialised services for women victims of gender-based violence, including the design of public funding mechanisms and annual budget allocations.
- **Pendingtheestablishmentofsustainableinstitutionalfinancing**,ensurethat **publiccallsforspecialisedservicesarereservedfororganisationsproviding specialised services in accordance with the IC,** and that funding decisions are basedon**transparentcriteriareflectingtheactualcostsofserviceprovision**.
- **Pending the establishment of sustainable institutional financing**, **publish individual funding allocations awarded** to each service provider through public calls,togetherwiththe**methodologyandcriteria**usedfordeterminingtheallocated amounts.

- **Establish three regional rape crisis centres in the central, southern and northernregionsofMontenegro** toensurecomprehensiveandaccessiblesupport for victims of sexual violence.
- **Increasethecapacityofspecialisedsheltersbyatleast40additionalfamily places(approximately120beds)** tomeettheICstandardofonefamilyplaceper 10,000inhabitants.Priorityshouldbegiventoestablishingaspecialisedshelterinthe northern region, expanding shelter capacity in Podgorica, and improving access to specialisedshelterservicesforwomenfromthewesterncoastalmunicipalities.Support the **adaptation of services for women with disabilities** who are victims of gender-basedviolence,includingphysicalaccessibility,specialisedequipmentandstaff capacity-building.
- **Establishshelterforvictimsofforcedmarriages** consideringthatsurvivorsface unique risks and have specific psychosocial needs and reintegration challenges.
- **Develop publicly funded transitional and social housing** for women victims of violencesothattheycanrebuildindependentlivesafterviolence,usingGRB.Develop a list of available local government facilities which could be instrumentalised as the shelters or social housing.
- Establishthe**Barnahusmodelasaspecialisedchild-friendlycomponent** ofthe broader systemfor respondingtosexual violence,violence,abuseandexploitation of children. Define, through law or by-laws, the institutional location, mandate, referral pathways, staffing requirements, interview protocols, data protection rules, confidentiality safeguards, child participation standards, accessibility measures and sustainable public financing using GRB for Barnahus.

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ANNEXES

Annex1.Example ofrequiredbudget foroneyear– SOSHelpline

Budget	Unit Type	#ofUnits	Amountper Unit	Total
Staff(includingtaxes&benefits)				**94,817**
ProjectCoordinator(s)	month	12	1,500	18,000
Operator1	month	12	1,140	13,680
Operator2	month	12	1,140	13,680
Operator3	month	12	1,140	13,680
Operator-albanianlanguage	month	12	702.2	8,426
Psychologist(s)	month	12	702.2	8426.4
Lawyer	month	12	700	8400
Adminstrator	month	12	577	6,924
Support person	month	12	300	3600
OperationalCosts				**4,660**
Electricity	month	12	100	1,200
Water	month	12	8	96
Transportandfuel cost	month	12	60	720
Communication	month	12	80	960
Bankprovisions	month	12	7.8	94
Databasemaintenance	year	1	630	630
Office costs	month	12	80	960
PreventionandVisibility				**1,500**
Promotionalactivities	Year	1	1,500	1500
TOTAL SUM				**100,976**

Annex2.Example ofrequiredbudget foroneyear– Shelter1

Budget	Unit Type	#ofUnits	Amountper Unit	Total
Staff(includingtaxes&benefits)				**193,800**
Director	month	12	1,800	21,600
Chairperson	month	12	800	9,600
Specialist	month	12	1,350	16,200
Specialist	month	12	1,350	16,200
SocialWorkers	month	12	1,100	13,200

Associate	month	12	1,050	12,600
Associate	month	12	1,050	12,600
Associate	month	12	1,050	12,600
Carers/educationalstaffforchildren	month	12	850	10,200
Carers/educationalstaffforchildren	month	12	850	10,200
Associate-night shift	month	12	1,000	12,000
Associate-night shift	month	12	1,000	12,000
Lawyer	month	12	850	10,200
FinancialManager	month	12	400	4,800
Psychologist	month	12	850	10,200
Housewife	month	12	800	9,600
OperationalCosts				**107,210**
Officerent	month	12	500	6,000
Buildingmaintenance	year	12	200	2,400
Electricity	month	12	350	4,200
Water	month	12	60	720
Internet	month	12	90	1,080
Transportandfuel cost	month	12	100	1,200
Stationaries	month	12	100	1,200
Cleaningmaterials(includingde-infestation)	month	12	250	3,000
BankFees	month	12	10	120
Annualaudit	year	1	850	850
Construction/reconstructionofthefacility	facility	1	5,000	5,000
Maintenanceofshelterfacility	month	12	200	2,400
Shelterequipment	month	12	500	6,000
Foodforvictims	month	12	2,500	30,000
Clothesforvictims	month	12	500	6,000
SanitaryorHygiene supplies	month	12	600	7,200
Medicinesandmedicalsupplies,tests,dental services, etc.	month	12	100	1,200
Recreationandeducationmaterialsforchildren	month	12	100	1,200
Supportforeconomicempowermentofwomen (e.g., small business startup)	year	12	100	1,200
Supervision,psychotherapyforshelterstaff	month	1	2,000	2,000
Securityandsecuritysystems	month	12	20	240
Maintenanceofcomputerequipment	month	12	100	1,200
Lawyer forAdviceandRepresentationServices	month	12	1,000	12,000
MonitoringExpert	month	12	300	3,600
Self-defensetraining	month	12	300	3,600
Yogatraining	month	12	300	3,600
TOTAL SUM				**301,010**

Annex3.Example ofrequiredbudget foroneyear– Shelter2

Budget	Unit Type	#ofUnits	Amountper Unit	Total
Staff(includingtaxes&benefits)				**111,720**
Director	month	12	1,800	21,600
ProjectCoordinator(s)	month	12	1,500	18,000
Finance Manager	month	12	1,300	15,600
Lawyer	month	12	900	10,800
Psychologist(s)	month	12	900	10,800
SocialWorkers	month	12	960	11,520
Carers/educationalstaffforchildren	month	12	750	9,000
Others	month	12	1,200	14,400
OperationalCosts				**260,040**
Buildingmaintenance	year	1	3,500	3,500
Vehicle	vehicle	1	6,800	6,800
Vehiclemaintenance	year	1	1,400	1,400
Electricity	month	12	600	7,200
Water	month	12	100	1,200
Internet	month	12	80	960
Telephone	month	12	150	1,800
Transportandfuel cost	month	12	600	7,200
Annualtaxes/registrationofvehicle	vehicle	2	800	1,600
Stationaries	month	12	400	4,800
Cleaningmaterials(includingde-infestation)	month	12	600	7,200
BankFees	month	12	160	1,920
Construction/reconstructionofthefacility	facility	1	20,000	20,000
Maintenanceofshelterfacility	year	1	3,000	3,000
Shelterequipment	year	1	1,500	1,500
Foodforvictims	month	12	1,500	18,000
Clothesforvictims	month	12	400	4,800
Sheltersupplies	month	12	450	5,400
SanitaryorHygiene suppiles	month	12	400	4,800
Communicationcostsfortheshelter(telephone)	month	12	150	1,800
Medicinesandmedicalsupplies,tests,dental services, etc.	month	12	300	3,600
Recreationandeducationmaterialsforchildren	month	12	180	2,160
Supportforeconomicempowermentofwomen (e.g., small business startup)	year	1	10,000	10,000
Supervision,psychotherapyforshelterstaff	month	12	800	9,600
Securityandsecuritysystems	year	1	3000	3,000
Referrals	month	12	150	1,800
Othercosts	month	12	400	4,800
Expertswithcontracts(notstaff)	month	12	800	9,600
Lawyer forAdviceandRepresentationServices	month	12	600	7,200
FinancialServices	month	12	150	1,800
MonitoringExpert	month	12	300	3,600

Paymentforlegaldocumentsforbeneficiaries (birth certificates, ID cards, tax in court etc.)	month	12	150	1,800
Systemscosts(e.g.,developing protocols/guidelines/standards,managing databases, perGREVIO/UNW)	month	12	400	4,800
Trainings/seminars/workshops	day	60	150	9,000
Teachers/trainer(s)	day	60	150	9,000
Refreshmentsforparticipants	event	20	500	10,000
Trainingmaterials	event	20	400	8,000
Trainingvenue	event	20	150	3,000
Accommodation	person	400	100	40,000
Specialists(vocationaltrainingandemployment ofbeneficiaries)includingtax,social,andhealth insurance	year	1	10,000	10,000
Translation/Interpreters	year	1	2,000	2,000
Datacollection	year	1	400	400
PreventionandVisibility				**13,870**
Banners	month	1	300	300
Leaflets	month	1	350	350
Brochures	month	1	420	420
Outreachmeetings	month	1	300	300
Socialmedia boosting	month	1	7,000	7000
Advocacy(e.g.monitoring,forlaws,etc.)	month	1	5,000	5000
Othercosts	month	1	500	500
Technical Equipment				**6,000**
Laptops	month	1	1,500	1,500
Securityequipment(cameras)	month	1	3,000	3,000
Projector	month	1	500	500
Printing	month	1	500	500
Othercosts	month	1	500	500
TOTAL SUM				**391,630**

Annex4.Example ofrequiredbudget foroneyear– Shelter3

Budget	Unit Type	#ofUnits	Amountper Unit	Total
Staff(includingtaxes&benefits)				**94,200**
Director	month	12	1,800	21,600
ProjectCoordinator(s)	month	12	1,500	18,000
Finance Manager	month	12	700	8,400
Psychologist(s)	month	12	1,000	12,000
Social Workers	month	12	1,000	12,000
SocialWorkers	month	12	1,000	12000
Carers/educationalstaffforchildren	month	12	850	10,200
OperationalCosts				**107,018**
Vehiclemaintenance	year	12	50	600
Electricity	month	12	500	6,000

Water	month	12	80	960
Internet	month	12	29	348
Telephone	month	12	30	360
Transportandfuel cost	month	12	50	600
Annualtaxes/registrationofvehicle	vehicle	1	330	330
Stationaries	month	6	60	360
BankFees	month	12	15	180
Annualtaxes	year	2	1,800	3,600
Annualaudit	year	1	1000	1,000
Shelterrent(accommodationforvictims)	month	12	1,600	19,200
Maintenanceofshelterfacility	year	12	300	3,600
Shelterequipment	year	1	2,000	2,000
Foodforvictims	month	12	4,250	51,000
Clothesforvictims	month	12	150	1,800
Sheltersupplies	month	12	200	2,400
SanitaryorHygiene suppiles	month	12	150	1,800
Medicinesandmedicalsupplies,tests,dental services, etc.	month	12	150	1,800
Recreationandeducationmaterialsforchildren	month	6	130	780
Supervision,psychotherapyforshelterstaff	month	12	200	2,400
Securityandsecuritysystems	year	1	500	500
Expertswithcontracts(notstaff)	month	3	200	600
Lawyer forAdviceandRepresentationServices	month	12	200	2,400
FinancialServices	month	12	200	2,400
Technical Equipment				**2,210**
Laptops	item	2	600	1,200
Securityequipment(cameras)	item	1	350	350
Projector	item	1	300	300
Printing	month	12	30	360
TOTAL SUM				**203,428**

Annex5. Example ofrequiredbudget forone year– Counsellingservices1

Budget	Unit Type	#ofUnits	Amountper Unit	Total
Staff(includingtaxes&benefits)				**95,734**
Director	month	12	1,800	21,600
ProjectCoordinator(s)	month	12	1,500	18,000
Finance Manager	month	12	1,186	14,234
Psychologist(s)	month	12	1,000	12,000
SocialWorkersx2	month	12	2,400	28,800
Others	month	11	100	1,100
OperationalCosts				**48,342**
Officerent	month	12	283.73	3404.76
Buildingmaintenance	month	12	250	3,000

Electricity	month	12	65	780
Water	month	12	8.16	98
Telephone+ internet	month	12	108.57	1,303
Transportandfuel cost	month	12	100	1,200
Stationaries	month	12	40	480
Cleaningmaterials(includingde-infestation)	month	12	20	240
BankFees	month	12	30	360
Annualtaxes	year	1	640	640
Annualaudit	year	1	800	800
Supervision,psychotherapyforstaff	month	12	240	2,880
Othercosts	year	1	1000	1,000
ExpertbyExperience-selfhelpgroupfacilitator	month	12	115	1,380
Refreshmentsforgroups	month	12	60	720
Lawyer forAdviceandRepresentationServices	month	12	2178	26,136
FinancialServices	month	12	210	2,520
Paymentforlegaldocumentsforbeneficiaries (birth certificates, ID cards, tax in court etc.)	month	12	100	1,200
Translation/Interpreters	year	1	200	200
PreventionandVisibility				**4,200**
Leaflets	year	1	1000	1000
Brochures	year	1	2000	2000
Socialmedia boosting	month/person	12	100	1200
TechnicalEquipment				**200**
Printing	month	4	50	200
TOTAL SUM				**148,476**

Annex6. Example ofrequiredbudgetforoneyear– Counsellingservices2

Budget	Unit Type	#ofUnits	Amountper Unit	Total
Staff(includingtaxes&benefits)				**83,496**
Director	month	12	1,800	21,600
ProjectCoordinator(s)	month	12	1,500	18,000
Finance Manager	month	12	986	11,832
Psychologist(s)	month	12	986	11,832
SocialWorkers	month	12	986	11,832
Associate	month	12	700	8,400
OperationalCosts				**11,988**
Officerent	month	12	460	5520
Buildingmaintenance	month	12	250	3,000
Electricity	month	12	50	600
Water	month	12	12	144
Internet	month	12	22	264
Telephone	month	12	90	1,080
Transportandfuel cost	month	12	50	600

Stationaries	month	12	30	360
Cleaningmaterials(includingde-infestation)	month	12	20	240
BankFees	month	12	15	180
PreventionandVisibility				**3,600**
Publicinformationmeeting	meeting	4	300	1200
Socialmedia boosting	month/person	12	200	2400
TOTAL SUM				**99,084**

Annex7. Example ofrequiredbudget forone year–Counsellingservices3

Budget	Unit Type	#ofUnits	Amountper Unit	Total
Staff(includingtaxes&benefits)				**84,768**
Director-coordinator	month	12	1,500	18,000
Assistant	month	12	1,200	14,400
Finance Manager	month	12	916	10,992
Lawyer	month	12	916	10,992
Psychologist(s)	month	12	916	10,992
SocialWorkers	month	12	916	10,992
Associate	month	12	700	8,400
OperationalCosts				**8,720**
Officerent	month	12	250	3000
Buildingmaintenance	month	12	50	600
Electricity	month	12	40	480
Water	month	12	5	60
Telephone+ internet	month	12	40	480
Transportandfuel cost	month	12	20	240
Stationaries	month	12	15	180
Cleaningmaterials(includingde-infestation)	month	12	10	120
BankFees	month	12	5	60
Supervision,psychotherapyforshelterstaff	year	1	3500	3,500
PreventionandVisibility				**1,950**
Banners	month	2	200	400
Leaflets	item	300	1.5	450
Brochures	item	400	2	800
Publicinformationmeeting/Radioshows	month	2	150	300
Technical Equipment				**60**
Printing -toner	item	3	20	60
Othercosts	month	0	0	0
TOTAL SUM				**95,498**

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AT WHAT COST?

Costing Specialised Services for Violence against Women in Montenegro