



Committee of the Parties
to the Council of Europe Convention
on Action against Trafficking in Human Beings

Recommendation CP/Rec(2025)12
on the implementation of the Council of Europe Convention
on Action against Trafficking in Human Beings
by Montenegro

*adopted at the 37th meeting of the Committee of the Parties
on 18 December 2025*

The Committee of the Parties to the Council of Europe Convention on Action against Trafficking in Human Beings (hereinafter referred to as "the Convention"), acting under the terms of Article 38(7) of the Convention;

Having regard to the purposes of the Convention to prevent and combat trafficking in human beings, while guaranteeing gender equality, protect the human rights of victims of trafficking, design a comprehensive framework for the protection and assistance of victims and witnesses, ensure the effective investigation and prosecution of the offences related to trafficking in human beings, and promote international co-operation;

Bearing in mind the provisions of Article 36(1) of the Convention concerning the monitoring role of the Group of Experts on Action against Trafficking in Human Beings (GRETA) in the implementation of the Convention;

Having regard to the Rules of Procedure of the Committee of the Parties;

Having regard to the instrument of ratification deposited by Montenegro on 30 July 2008;

Having examined the fourth report concerning the implementation of the Convention by Montenegro, adopted by GRETA at its 54th meeting (30 June - 4 July 2025), as well as the comments of the Montenegrin Government received on 30 September 2025;

Bearing in mind the focus of the fourth evaluation round of the Convention on vulnerabilities to human trafficking and measures taken to prevent them, detect and support vulnerable victims, and punish the offenders, as well as the additional focus on the use of information and communication technology (ICT);

Considering the conclusions and proposals for action contained in Appendix 2 of GRETA's fourth report on Montenegro related to the thematic focus of the fourth evaluation round and follow-up topics specific to Montenegro;

Welcoming the measures taken and the progress achieved by Montenegro in implementing the Convention, and in particular:

- the further development of the legislative framework relevant for combating trafficking in human beings, including the adoption of a provision on the non-punishment of victims of human trafficking for offences they were compelled to commit, the expansion of the definition of human trafficking in the Criminal Code and the amendments to the Law on Free Legal Aid;
- the conclusion of a revised agreement on co-operation between relevant institutions and NGOs in the area of combating human trafficking;

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- the multi-disciplinary approach to victim identification and the increase in the number of formally identified victims of human trafficking;
 - the opening of a designated state shelter for child victims of human trafficking;
 - the increase in the number of investigated and prosecuted cases of trafficking in human beings;
 - the efforts made to promote online safety and enhance capacity to detect and investigate technology-facilitated trafficking in human beings.

A. Recommends that the Government of Montenegro take measures to address the following issues for urgent action¹ identified in GRETA's report:

1. ensure that the Labour Inspectorate has adequate human and financial resources to carry out regular and proactive inspections with a view to preventing and detecting cases of THB for the purpose of labour exploitation (paragraph 55);
2. increase the human and financial resources of centres for social work with a view to ensuring that unaccompanied and separated children are provided with adequate protection by legal guardians, in order to prevent them from becoming victims of trafficking in human beings (paragraph 69);
3. ensure that whenever there are reasonable grounds to believe that a foreign national is a victim of human trafficking, the person concerned has access to a recovery and reflection period (paragraph 105);
4. take steps to improve the provision of assistance to victims of trafficking in human beings, in particular by ensuring that:
 - all service providers, including health care institutions, are aware of their obligation to provide support to victims of human trafficking under the relevant regulations and the Agreement on mutual co-operation in the area of combating human trafficking, and there is proper co-ordination and follow-up with regard to the provision of support to victims;
 - the process of approval and revocation of licenses for NGOs which are running the shelters is transparent and includes proper monitoring procedures;
 - child victims are accommodated in safe and child-friendly premises and the staff of the shelter, including psychologists, as well as other professionals working with child victims of THB are provided with training and sensitisation on human trafficking;
 - there is availability of accommodation for male victims of human trafficking;
 - there is an effective complaint mechanism in each shelter enabling its residents to contact competent outside bodies on a confidential basis, and any complaints of staff misconduct are effectively investigated (paragraph 120);
5. take further steps to improve the criminal justice response to human trafficking, including by:
 - strengthening efforts to proactively investigate cases involving trafficking in human beings for the purpose of labour exploitation, as well as cases of trafficking for the purpose of sexual exploitation allegedly taking place in coastal areas, resulting in successful prosecutions and effective, proportionate and dissuasive sentences;
 - ensuring that sufficient human and financial resources are available to the police and prosecution, including on the local level, to facilitate the investigation and prosecution of human trafficking cases;
 - ensuring availability of interpreters for languages spoken by victims of trafficking, with a view to facilitating investigations in human trafficking cases;

¹ The number of the paragraph setting out GRETA's proposals in the report is indicated in brackets.

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- providing victims of human trafficking with adequate protection and support throughout the criminal proceedings in order to prevent retaliation or intimidation and avoid further victimisation (paragraph 148);
6. guarantee effective access to compensation for victims of human trafficking, in particular by:
- ensuring that the collection of evidence about the harm the victim has suffered, including the financial gain from the exploitation of the victim or loss sustained by the victim, is part of the criminal investigation with a view to supporting compensation claims in court;
 - making full use of the legislation on the seizure and confiscation of criminal assets to secure compensation to victims of human trafficking;
 - providing training on compensation for victims of human trafficking to lawyers, prosecutors and judges and encouraging them to use all the possibilities under the law to uphold compensation claims by victims of human trafficking;
 - ensuring that all victims of human trafficking, regardless of nationality and residence status, are eligible for state compensation, by bringing into force the Law on Compensation for Damages to Victims of Violent Crimes without further delay (paragraph 174);

B. Bearing in mind GRETA's conclusions that some recommendations made repeatedly in preceding evaluation rounds have not been implemented or have been only partially implemented, requests the Montenegrin authorities to take steps to implement the recommendations in points 3, 5 and 6 as a matter of priority;

C. Recommends that the Montenegrin authorities take measures to implement the other proposals for action listed in Appendix 2 of GRETA's fourth evaluation report;

D. Requests the Montenegrin Government to report to the Committee of the Parties on the measures taken to comply with this recommendation by 18 December 2027;

E. Invites the Montenegrin Government to continue the dialogue in progress with GRETA and to keep GRETA regularly informed of the measures taken in response to GRETA's conclusions.