OSCE ODIHR
HATE CRIME REPORTING

Information contained in this report was compiled as part of ODIHR's 2022 Hate Crime Report.
For more information, including on previous years' reporting, please visit: hatecrime.osce.org/montenegro

For more information about ODIHR's Hate Crime Report, visit: hatecrime.osce.org/our-methodology

1 2022

Summary

Montenegro has reported information on hate crimes to ODIHR, most recently for the 2023 and 2024 Hate Crime Reports.

In 2017, Montenegro adopted measures to facilitate the effective prosecution of hate crimes following the judgment of the European Court of Human Rights in the case of *Alkovic v. Montenegro* (No. 66895/10). In 2023, Montenegro amended legislation to include the offence of public acts provoking or inciting racial and religious hatred (Article 370), as well as special circumstances for sentencing hate crimes (Article 42a).

In 2025, the Supreme State Prosecutor adopted the Binding Instruction on the Conduct of State Prosecutors' Offices in Cases of Hate Crimes and Hate Speech. The Instruction improves the system for recording, monitoring and reporting on criminal offences committed out of hatred and hate speech.

In 2013, Montenegrin police officers participated in ODIHR's Training Against Hate Crimes for Law Enforcement (TAHCLE), followed by cascaded training events between 2013 and 2022, and a ODIHR refresher training in 2022. In 2023, ODIHR delivered a train-the-trainer workshop to prosecutors and judges as part of its Prosecutors and Hate Crime Training (PAHCT) programme.

Hate crime data collection in Montenegro
Support for hate crime victims in Montenegro
Hate crime capacity building in Montenegro
Montenegro's hate crime legislation

ODIHR's Key Observation

ODIHR recognizes Montenegro's efforts to report police and judiciary hate crime records to ODIHR. However, based on the available information, ODIHR observes that Montenegro has not reported data on the number of prosecuted hate crimes to ODIHR or recorded the bias motivations of hate crimes. In addition, ODIHR observes that Montenegro would benefit from developing its victim support system to ensure effective access to justice, assistance, and protection services for hate crime victims.

Official Data

Police recorded and sentenced figures were disaggregated by type of crime. The above figures may include cases of hate speech, which fall outside of the OSCE's definition of hate crime.

Year	Hate crimes recorded by police	Prosecuted	Sentenced
2022	3	not available	602

Police data by bias motivation

The breakdown below may include cases of hate speech, which fall outside of the OSCE's definition of hate crime.

3

Unspecified

Police data by type of crime

The breakdown below may include cases of hate speech, which fall outside of the OSCE's definition of hate crime.



Incitement to violence

This category includes offences under Article 370 of the Criminal Code (on "Causing National, Racial and Religious Hatred").



Unspecified crime type

This category includes offences under Article 168 of the Criminal Code (on "Endangering security").

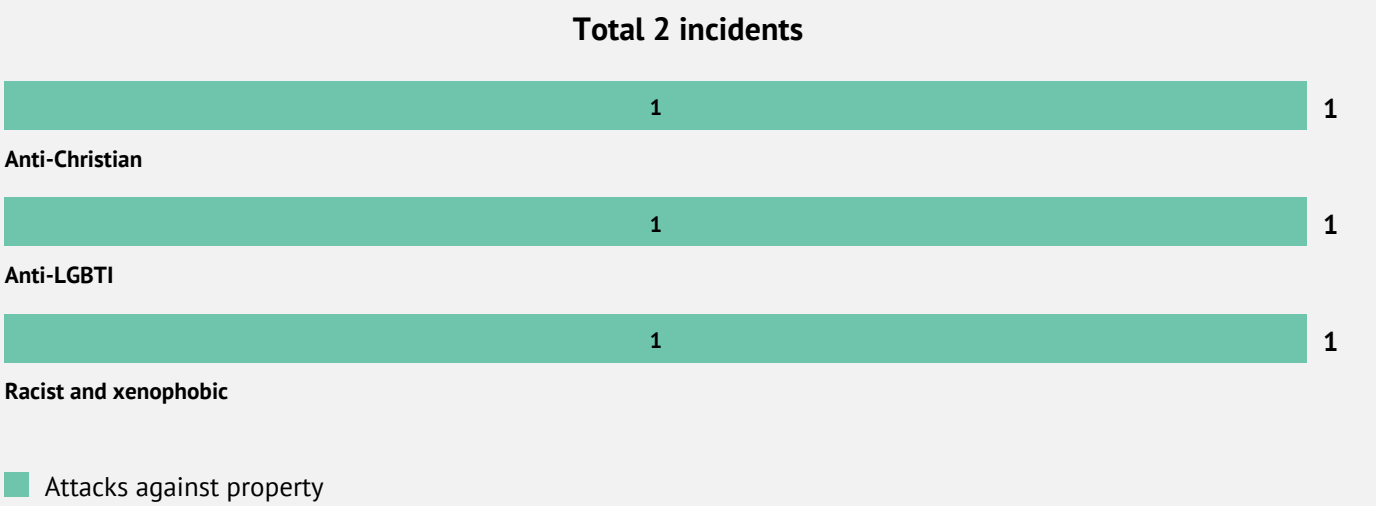
National Developments

In 2022, a Memorandum of Co-operation was signed by ODIHR, the Supreme State Prosecutor's Office of Montenegro and the Centre for Training of the Judiciary and State Prosecutor's Office. The Memorandum related to the implementation of ODIHR's Prosecutors and Hate Crimes Training Program (PAHCT), for which a training-of-trainers took place in 2023.

Throughout 2022, the Centre for Training in the Judiciary and the State Prosecutor's Office conducted several courses on hate crimes as part of initial and continuous training for judges and prosecutors.

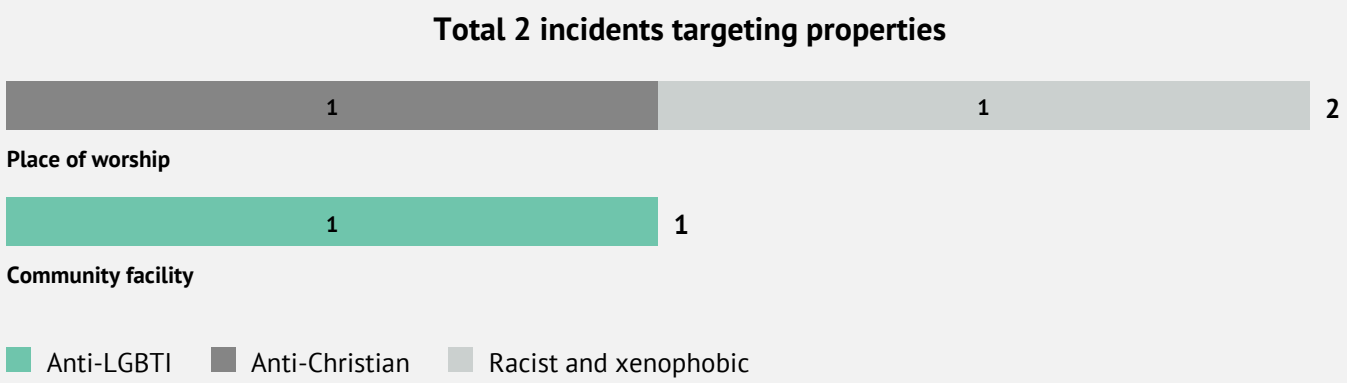
In a **notable case**, criminal charges were brought against a man in Podgorica, who threatened a German Embassy employee outside the building. The prosecution was discontinued after the suspect paid a fine.

Incidents reported by civil society

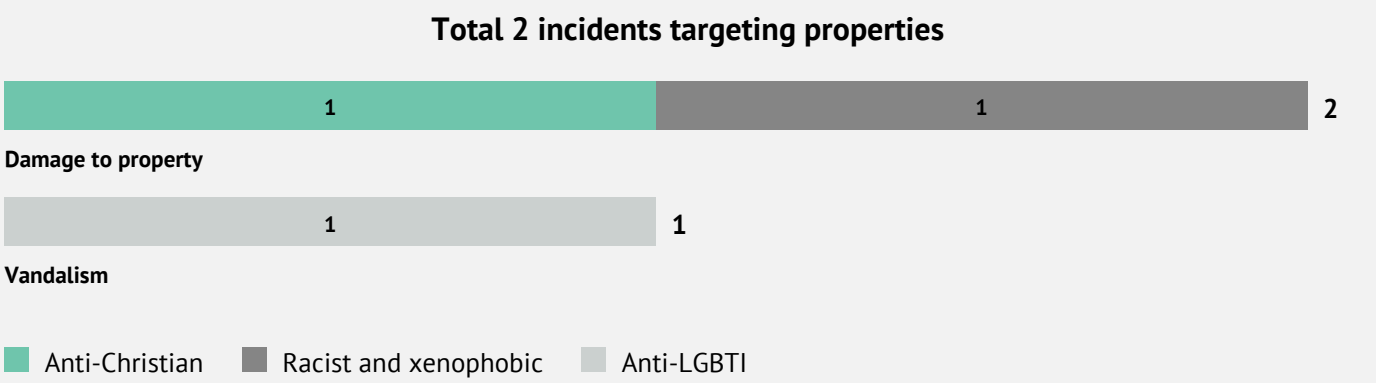


Please note that the total number of incidents may be lower than the sum of incidents presented in the breakdown chart above, as some incidents involve multiple bias motivations.

Targeted properties



Type of property attack



View civil society incidents for Montenegro, 2022