

The Report is part of the
"Improved Transparency and
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**STEČAJCI
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Supported by



Women's Safe House

COMBATING HUMAN TRAFFICKING

-Report on Reform Progress
and Transparency-

2010 - 2013

December 2013

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TABLE OF CONTENTS

INTRODUCTION	3
1. INSTITUTIONAL ANTI-TRAFFICKING FRAMEWORK	4
2. INFORMATION ON THE PROGRESS OF REFORMS	5
2.1. Implementation of the 2010-2011 Action Plan	5
2.1.1. General goals	5
2.1.2. Criminal prosecution	6
2.1.3. Protection	7
2.1.4. Prevention	8
2.2. Implementation of the 2012-2013 Action Plan	9
2.2.1. Prevention	9
2.2.2. Education	9
2.2.3. Identification of human trafficking victims	10
2.2.4. Assistance, protection and reintegration of victims	10
2.2.5. Efficient prosecution and punishment	11
2.2.6. International cooperation	11
2.2.7. Coordination	12
2.2.8. Partnership	12
2.3. Access to data on the reform progress	13
3. CONCLUSIONS AND RECOMMENDATIONS	14
Annex: Responses of institutions to information requests	15

INTRODUCTION

This Report is made within the framework of the project implemented by six nongovernmental organisations: Network for Affirmation of Non-Governmental Sector (MANS), the Women's Safe House, Mogul, Stečajci u Crnoj Gori (Workers of Bankrupt Companies in Montenegro), Breznica and the Youth Association of Montenegro.

As a part of this project, the Women's Safe House monitors the implementation of the Free Access to Information Law (FAI Law) by competent authorities in the field of fight against human trafficking, and the progress of reforms defined by the government strategy paper and the accompanying action plans.

The first part of the report focuses on the institutional framework, and the second on the progress of reforms set by the action plans for specific institutions, as well as the transparency of such efforts, while the third part contains some conclusions and recommendations.

The data featured in this report were collected from 30 different state authorities, obtained by invoking the FAI Law.

1. INSTITUTIONAL ANTI-TRAFFICKING FRAMEWORK

The **Office for Fight against Human Trafficking** is the umbrella government institution for combating trafficking in human beings in Montenegro. The Office is responsible to coordinate the efforts of competent state administration bodies, international and nongovernmental organisations for implementing the National Anti-Trafficking Strategy with a view of providing for sound protection of victims, prevention and prosecution of perpetrators.

The Office coordinates the sessions of the Working Group monitoring the implementation of the National Anti-Trafficking Strategy and the accompanying action plans, and is involved in international cooperation. Based on the data collected from competent authorities, the Office compiles the statistics on trafficking victims, and various types of reports. The Office reports to the Government.

The **Ministry of the Interior (Mol)** no longer has a unit to be dealing with human trafficking; this responsibility has been shifted to the Anti-Trafficking Office, as an entity separate from the Mol¹.

According to the Anti-Trafficking Strategy, the Mol² is responsible for operational monitoring of the development and strategic planning in fight against crime, supervision and internal control over the police work and procedures, the expertise, legality and efficiency of the policing.

The above Strategy includes also the proposals, monitoring and implementation of mechanisms for efficient fight against human trafficking.

The **Police Directorate**, following the most recent amendments to the Law on Internal Matters³, is again operating as an administration body under the umbrella of the Mol, which is a substantial innovation in the police reform process.

The Police Directorate organises efforts on combating trafficking in human beings through its Organised Crime and Corruption Division.

Within the scope of its competences, the Police Directorate offers assistance to prospective victims in the processes of integration, reintegration and investigation involving the countries of origin, of transit and of destination. It is also within their responsibilities to provide for the public availability of information on possible threats and consequences of trafficking in human beings and trafficking of children.

This authority, together with the **state prosecution office** in charge of raising indictments and **courts** involved in the adjudication of cases, report quarterly to the Anti-Trafficking Office providing details on the number of criminal reports, indictments raised and judgments brought, which are used as statistical inputs for analysing human trafficking crimes.

¹ The relevant Government Decree was adopted at the session held on 18 April 2013.

² <http://www.antitrafficking.gov.me/vijesti/116182/Vlada-utvrдила.html>

³ The Law was adopted at the eighth sitting of the first regular session of the Parliament of Montenegro held on 26 July 2012.

2. INFORMATION ON THE PROGRESS OF REFORMS

The Government adopted the Anti-Trafficking Strategy on 13 November 2003, and the accompanying 2010-2011 Action Plan on 21 January 2010⁴. On 13 September 2012, the new Strategy was adopted together with the 2012 - 2013 Action Plan.

This section of the Report features the information on the Action Plan implementation obtained from responsible institutions pursuant to the requests filed under the procedure stipulated in the FAI Law.

2.1. Implementation of the 2010-2011 Action Plan

The 2010-2011 Anti-Trafficking Action Plan was divided into four major areas envisaging specific actions with a view of stepping up efforts in combating trafficking in human beings: general goals, prosecution, protection and prevention.

2.1.1. General goals

Law amendments - According to the information provided by the relevant institutions, the amendments to the Criminal Code⁵ and modifications of trafficking in persons as a criminal offence⁶ were carried out with a view of alignment with the UN Convention on Transnational Organised Crime with the accompanying Palermo Protocol, but also with the Council of Europe's Convention on Action against Trafficking in Human Beings. In addition, the Council of Europe's Convention on the Compensation of Victims of Violent Crimes⁷, previously ratified, now entered into force in Montenegro.

International cooperation - The Anti-Trafficking Office designated the focal point for cooperation with the Secretariat of the GRETA Group of Experts monitoring the implementation of the Council of Europe's Convention on Action against Trafficking in Human Beings. In February 2011, Montenegro received the GRETA questionnaire concerning the implementation of the said Convention and provided responses to the questions within half a year. In November 2011, the GRETA representatives visited Montenegro and held a number of meetings with relevant representatives of the Government, the Parliament and NGOs, following which an independent report was completed in November 2012⁸. At that time, the Mol monitored the efforts on combating human trafficking having as reference the Action Plan for implementing the Anti Corruption and Organised Crime Strategy, based on the indicators envisaged by this document. In addition, in December 2011, the Government approved the Draft Law on Compensation of Victims of Violent Crimes, but this has not been adopted yet.

In October 2010, Montenegro received the concluding remarks by the UN Committee on the Rights of the Child regarding the implementation of the Convention on the Rights of the Child and its accompanying protocols, which were forwarded to all relevant state authorities for implementation. The deadline for reporting to the UN Committee on the Rights of the Child on the progress made is October 2015.

⁴ Given the Strategy life span, the Government adopted relevant APs in previous stages, but these are not relevant for the purposes of the present Report given its focus on the period 2010 to 2013.

⁵ Adopted on 22 April 2010

⁶ Art 444 of the Criminal Code

⁷ Entered into force on 1 July 2010

⁸ More details in the following section

In late 2010, Montenegro joined the countries in the region in implementing the project aimed at fostering transnational cooperation on human trafficking cases in South East Europe.

Cooperation with NGOs - Over the period observed, the Anti Trafficking Office revised the sample Memorandum of Understanding signed with many government agencies and nongovernmental organisations, and signed the revised MoU with three government authorities⁹ and four NGOs¹⁰. The otherwise envisaged monitoring of the implementation of MoUs was not carried out since authorities failed to designate new contact persons following the personnel changes in the authorities which are signatories to MoUs.

Reports - Over the same period, the Anti-Trafficking Office compiled 29 different reports on the progress made in combating human trafficking, provided to various domestic and international bodies and organisations. Over the same period, the Ministry of Foreign Affairs and European Integration submitted reports to diplomatic and consular missions and international organisations on the efforts made by Montenegro in this field, also prepared by the Anti-Trafficking Office.

Events - The Anti-Trafficking Office also organised and took part in a number of domestic and international events aimed at sharing experiences in combating trafficking in human beings. In 2010 and 2011, the Office issued 87 press releases, but there is no information on the actual media reports.

Monitoring - In 2010 the Anti-Trafficking Office also developed the Rules of Procedure for the Working Group for monitoring the implementation of the National Anti-Trafficking Strategy, which held six meetings in 2010, and another 10 in 2011. Over the same period, the new National Strategy was developed, covering the period 2012 to 2018.

2.1.2. Prosecution

Statistics - In 2010, a special Tripartite Commission, including members of the police, the prosecution and the courts, as coordinated by the Anti-Trafficking Office, compiled a register maintained at the Office based on monthly reporting by the above institutions. Over the period observed, the register was populated with all the statistical indicators relevant for human trafficking over the period 2003 to 2011 - the criminal reports handled, the indictments raised, the progress as per criminal proceedings and the judgments made. Thus, the data base with the information relevant for assessing the scope and prevalence of human trafficking was developed for the first time.

The Office reported that in 2010 the Police Directorate filed two criminal reports involving 10 persons, and during the same year the prosecutors brought charges against 16 persons, and the courts pronounced 7 convictions for 29 persons, with three judgments against nine persons being final.

The international organisation installed a new, upgraded electronic database of trafficking victims and perpetrators of the trafficking in persons for the Anti-Trafficking Office.

⁹ The Supreme Court, the Centre for Support to Children - Bijelo Polje, and the Red Cross

¹⁰ Help lines from Podgorica and Nikšić, the Centre for Scholarships for the Roma, and the Home of Hope

Legal modifications - Apart from the amended Criminal Code entering into force (more information in the previous section), Montenegro also adopted the Law on Handling Juveniles in Criminal Proceeding¹¹ thus putting in place the assumptions for avoiding typical criminal proceedings against juveniles, including criminal sanctions. The beginning of implementation of the new law was postponed for September 2012, when all implementing legislation was adopted and the assumptions put in place for the work of expert services to offer support to judicial bodies when prosecuting juveniles. With a view of strengthening the capacities to implement this law, an IPA supported project was implemented through the UNICEF Montenegro office. Over the reporting period, no rules for handling vulnerable persons appearing before the judicial bodies were developed, or the actions of authorities when dealing with such persons analysed.

Witness services - In 2011 in all courts handling human trafficking, trafficking in children for adoption and family or domestic violence cases, the services for witnesses/victims of such crimes were established.

Police data - Over the two reporting years, the Police Directorate provided to the Anti-Trafficking Office the total of 20 reports on the actions taken with a view of identifying the trafficking victims, especially the at-risk groups. In addition, through regular training delivered at the Police Academy, the police officers undergo continuous training on the human trafficking issues.

Staff - At the request of the Anti-Trafficking Office, the Police Directorate designated the human trafficking coordinator. The total number of staff in all government authorities dealing with human trafficking in late 2011 was 228.

Meetings - The data provided also state that over the reporting period the Office director held several meetings with the representatives of the NGO Montenegrin Women's Lobby managing the Government shelter for human trafficking victims, which provides to the Office the regular daily and monthly reports of their activities with statistics on the number of residents within the shelter.

2.1.3. Protection

Shelter - By funding the Government shelter for human trafficking victims, the Office provided shelter, food, clothing and other types of assistance and protection for the shelter residents. Over the period observed, the shelter accommodated the total of 20 persons, whose health status was checked and who were offered the required psychological, medical and all other assistance needed. The minors housed there were entrusted to guardians, as required by law. The police ensured continuous physical protection of the shelter. No operational and supervision instructions for the shelter were made, nor any reports developed regarding the degree of the standards applied.

The reintegration plan was made for one person originating from another country, which was subsequently implemented - the travel documents, health care, money and transport to the home country were provided where this person was met by the representatives of the relevant authorities there who assumed further care.

¹¹ In December 2011

Training - Over the period observed no training regarding reintegration was organised for members of relevant institutions or NGOs.

2.1.4. Prevention

Public relations - With a view of fostering the preventative role of the Anti-Trafficking Office and raising public awareness regarding trafficking in human beings, the members of the Office had a number of appearances on Montenegrin TV stations and gave a number of statements to the press and electronic media, but also held a number of meetings with relevant stakeholders. In addition, the Anti-Trafficking Office's webpage was upgraded and features contains relevant legislation and other official documents, press releases, materials from meetings, round table discussions and other relevant events, as well as the promotional material.

The Anti-Trafficking Office, moreover, declared October 2010 as the month of fight against trafficking in human beings, when it launched a major media campaign in cooperation with the Ministry of Education and Sport and the Ministry of Culture. A year afterwards, similar campaign was launched in cooperation with the Red Cross of Montenegro. During both years, on 18 October the first class in primary and secondary schools within the territory of Montenegro was devoted to the issue of human trafficking.

Help line - The Anti-Trafficking Office opened a helpline for victims of violence available 24/7 and carried out a campaign for its promotion through a TV spot aired on all Montenegrin TV channels, and a large number of posters and info materials placed at border crossing points and available in several languages. The helpline was additionally promoted through the Community Policing project with the assistance of the Police Directorate.

Training - The Anti-Trafficking Office also took part in the training delivered to tourism workers, signatories of the Code of Practice to protect juveniles against sexual exploitation in travel and tourism.

In its educational efforts, the Office focused particular attention on students, thus accrediting a teacher training programme aimed at incorporating the human trafficking topic in the civic education curriculum. The teachers were selected and trained, and the Teacher Manual and the informational materials for students were also developed.

The trainers from the Anti-Trafficking Office delivered a large number of training events for vulnerable groups, including children with and without parental care and members of the RAE population. The only measure envisaged which remained unaddressed over the period observed involved the training of Montenegro's diplomatic and consular staff on the human trafficking issues.

Police controls - Over the same period, the Police Directorate checked the advertisements offering various services which may give rise to human trafficking, but without giving any details of the outcomes of such checks.

2.2. Implementation of the 2012 - 2013 Action Plan

The Anti Human Trafficking Action Plan that started to be in effect in 2012 differs in the methodological sense from the previous one. This Acton Plan is divided in seven sections: prevention, education, identification of human trafficking victims, assistance, protection and reintegration of victims, efficient prosecution and punishment, international cooperation, coordination and partnership.

Below there is an overview of activities undertaken in 2012 and 2013.

2.2.1. Prevention

Help line - Government provided funds to continue the operation of the helpline for human trafficking victims and continued campaigning with a view of its promotion.

Campaign - A TV spot promoting the helpline was aired, and in cooperation with the Police Directorate, posters were placed at all border crossing points for further promotion of the helpline.

As a part of the events to mark the anti-trafficking day, 18 October 2012, in cooperation with Montenegro Airlines and Montenegro Railways, informational material with the helpline number was distributed with the tickets purchased. Again this time the first class in all Montenegrin schools was devoted to the issue of trafficking in human beings.

The Anti-Trafficking Office developed fliers targeting young people with the information on human trafficking that, in cooperation with the Ministry of Education and Sport, was disseminated among the students of final grade of secondary schools, immediately before leaving for student field trips.

Trafficking in children - There was no project developed aimed at curbing the number of children on the streets as beggars. In late 2012, the Ombudsman presented the findings of a survey on sexual exploitation of children in Montenegro.

Public panels - Over the period observed there were no organised panels or workshops at universities that would be dealing with human trafficking issues.

2.2.2. Education

The Judicial Training Centre delivered 12 training events for over 150 participants focusing on criminal law institutes applied in fight against human trafficking. Over the same period, the Police Academy organised two events for over 20 officers of the Police Directorate.

The Anti-Trafficking Office also organised 5 training events, in cooperation with other state authorities and the NGO sector, attended by a large number of participants including the members of the army, police, customs, local governments, centres for social work and other bodies and institutions.

Over the period observed, the Human Resources Management Administration (HRMA) was not involved in any training for civil servants and state employees with a view of sensitising them for human trafficking issues, and there was no training available for the practitioners in

centres for social work, children's home "Mladost" Bijela or the Centre for Children and the Young "Ljubović".

There was no joint training of commissioners for foreigners and officers in the reception facility for foreigners regarding early identification of potential human trafficking victims among migrants. There were no motivational meetings and seminars with editors and council members of the public broadcaster with a view of securing airtime for preventive actions.

Fight against human trafficking has not yet been included among the themes covered in the preparatory programmes for diplomatic and consular staff before assuming office, especially in countries recognised as countries of origin or final destination of human trafficking victims. In addition, there was no specialised training programme developed for members of local parliaments around this issue, nor any training of such persons.

Personal data - There were no rules developed for processing and protection of personal data of human trafficking victims and perpetrators of trafficking in persons as a criminal offence, nor were any personal data records of such persons submitted.

2.2.3. Identification of human trafficking victims

Police operations - Over the period observed two long-term police operations were conducted in continuity "Beggar" and "Police Raid" aimed at detecting human trafficking victims. There were in total 53 actions within the "Beggar" operation and 40 actions within the "Police Raid" operation, but with no data available on the numbers of identified human trafficking victims and possible ensuing proceedings.

Inspection checks - The Inspection Administration carried out regular checks aimed at suppressing unlawful operation, including those referring to foreign nationals. For 582 foreign nationals discovered not to be employed in accordance with the law, employers were ordered to conclude employment contracts with them and to provide for them the mandatory social insurance.

Local self-government - Civil society members had repeated meetings with local services with a view of strengthening cooperation on identification and assistance to trafficked persons. Over the same period, the head of the Anti-Trafficking Office met with several mayors aiming to step up the Office actions at the local level.

Indicators for identification - During a one-day workshop organised by the Anti-Trafficking Office together with the OSCE, specific indicators for early detection of potential trafficking victims were developed. Over the period observed no multilingual questionnaires based on specific indicators were developed.

Self-identification - No assumptions were put in place for increasing the level of detection or self-identification of prospective victims among the vulnerable groups, such as persons engaging in prostitution, migrants holding no personal documents, internally displaced persons and members of the RAE population.

2.2.4. Assistance, protection and reintegration of victims

Shelter - More appropriate space for placement of human trafficking victims was leased in which both children and adults can be placed. The shelter was equipped with the assistance of the Government of Montenegro, but also the Red Cross and Turkish Cooperation and Coordination Agency. The shelter continued offering all forms of victim protection - psychological, medical and any other type of assistance necessary. The two juveniles staying at the shelter were provided with medical and psycho-social assistance, had their guardians appointed and individual protection plans developed.

Internet - The Mol's web pages were updated with all the relevant information on the possibility for foreign trafficking victims of being granted temporary residence permits. Nevertheless, there were no such applications over the period observed.

Legal amendments - In July 2012, the Government approved the Draft Law on Social and Child Protection, adopted by the Parliament in May 2013. It envisages special protection for trafficking victims. Over the period observed, there was no definition of requirements, norms or minimum standards for social and child protection service provision, and no licences for service providers were either issued, renewed or revoked.

There was no law passed to govern the right to compensation for victims of violent crimes, including human trafficking.

Equipment for courts - In 2012, the "Justice for Children" project was launched by UNICEF envisaging the procurement of additional equipment for courtrooms to minimise secondary victimisation of children.

Cooperation with NGOs - The cooperation between the National Employment Office and NGOs on inclusion of trafficking victims into labour market, with a view of their professional development, was not formalised.

2.2.5. Efficient prosecution and punishment

Statistics - In 2012, the Police Directorate filed only one criminal report against one person charged with trafficking in persons. The state prosecution ordered investigation against one person, and the competent court convicted one person of human trafficking.

Access to judgment - All judgments in human trafficking cases are available on web pages of High Courts Podgorica and Bijelo Polje.

2.2.6. International cooperation

Conventions - The Council of Europe's Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse was ratified, and a promotional campaign ensued, including some events gathering experts. In addition, the National Team to deal with these issues was set up.

Legal amendments - The Ministry of Justice drafted the amendments to the Criminal Code in response to the GRETA and EU recommendations by extending the scope of the trafficking in persons as a criminal offence, but also by introducing new offences regarding trafficking in human organs and advertising such trafficking.

MoUs - The interior ministers of Southeast European countries signed an MoU aiming to support putting in place the assumptions for setting up joint investigation teams for trafficking in persons. The drafting of a Cooperation Agreement between Montenegro and Kosovo on combating human trafficking was launched, and one of the initially planned three meetings between the counterpart institutions was held. The head of the Anti-Trafficking Office took part in several international events and meetings.

Joint investigation teams - No more detailed provisions were introduced in the Law on Mutual Legal Assistance in Criminal Matters that would enable the establishment of joint investigation teams with prosecutors and police officers of several countries for conducting joint investigations, gathering and using evidence before competent courts of other countries, including the cooperation with Interpol, Europol, SELLEC Centre, SEEPAG and other organisations.

Rights of the child - The Ministry of Labour and Social Welfare set up a drafting group for the National Plan of Action for Children 2013-2017, as a strategic framework defining policy for children, pursuant to the recommendations of the UN Committee for the Rights of the Child.

2.2.7. Coordination

Office - In April 2013, by the Government decision, the Office for Fight against Trafficking in Human Beings was relocated from the MoI and put again under the General Secretariat to the Government, increasing at the same time the number of posts within the Office by two.

Public relations - The Anti-Trafficking Office web pages were updated with all the relevant legislation, reports and other documents regarding human trafficking. Over the period observed, the Office issued 23 press releases, but there is no information on the actual media reports.

Local self-governments - The Office head had a number of meetings with mayors to agree joint activities to prevent trafficking in persons, particularly during the summer season.

Action Plan monitoring - The Working Group monitoring the Action Plan implementation held five meetings, but without any specific recommendations for improvements.

Cooperation agreements - The cooperation agreement regarding prevention, protection and reintegration of prospective human trafficking victims among the Anti-Trafficking Office, the Ministry of Justice, the Ministry of Health, the Ministry of Labour and Social Welfare, the Police Directorate, the Supreme State Prosecution, the Supreme Court, public institutions and NGOs was not revised or signed, and the capacities of the relevant liaison officers were not strengthened. For that reason, the agreement was not publicly presented nor were there any meetings of liaison officers. The MoU between the Anti-Trafficking Office and the Office for the Young was not signed either.

2.2.8. Partnership

Cooperation with NGOs - Over the period observed, there was no civil society representative serving on the Anti Trafficking Working Group. The office supported the participation of a member of the Helpline Nikšić in two international events on human trafficking.

Cooperation with the business sector - Over the same period over 200 tourism workers signed the Code of Conduct for protecting children against sexual exploitation of children in travel and tourism and are implementing it in continuity. The Office applied for TAIEX assistance for the sexual exploitation in tourism and the project was approved.

2.3. Access to data on reform progress

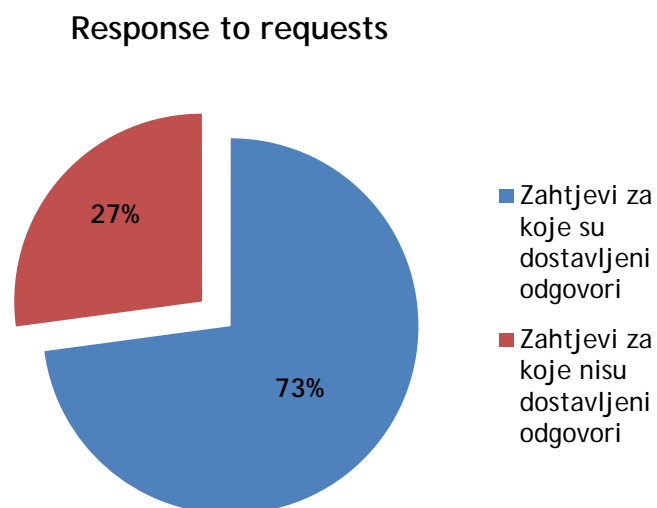
Over the last six months, the total of 70 requests for access to information¹² were filed with 30 institutions directly involved in combating human trafficking or in other ways involved in these activities.

The above requests were sent to the Ministry of Human and Minority Rights, the Ministry of Labour and Social Welfare, the Ministry of Foreign Affairs and European Integration, the Ministry of the Interior, the Police Directorate, the National Security Agency, the Anti Human Trafficking Office, the Court of Appeals, the basic courts in Montenegro, the high courts, the Supreme State Prosecution Office and the Ombudsman.

The requests concerned the information on reforms taken in order to enhance the efforts on combating trafficking in human beings, the trafficking cases reported and prosecuted, and the implementation of international commitments in this respect.

Most institutions responded to over 70% of the request filed¹³, while three institutions responded only partially.

Appeals were lodged against the institutions which failed to respond to requests in due time or which responded only partially. Three of them responded after the appeals were lodged, while the remaining five¹⁴ have not responded yet.



Graph no. 1: A ratio between the requests that were responded to and the ones that were ignored

The institutions which failed to respond to information requests include the Police Directorate, the High Court Bijelo Polje, the Basic Court Podgorica, the Ministry of Health and the Ombudsman's Office.

The annexes below give detailed information on responses to the free access to information requests.

¹² Initial requests were filed on 12 July 2013.

¹³ Annex 1 gives a detailed overview of institutions which did respond to requests.

¹⁴ Annex 2 features detailed information on institutions that have not responded yet.

3. CONCLUSIONS AND RECOMMENDATIONS

The data obtained show that many of the planned reforms have not been implemented yet. Thus, the Women's Safe House recommends the following:

- 1. The Ministry of the Interior, the Anti-Trafficking Office and other responsible institutions as envisaged by the Action Plan to urgently implement all the measures not carried out within the stipulated timeframe;*
- 2. The Ministry of Justice to propose, and the Parliament to enact, the amendments to the Law on Mutual Legal Assistance in Criminal Matters to enable establishing joint investigation teams composed of prosecutors and police officers from several countries to carry out joint investigations, collect evidence and use such evidence before the courts holding jurisdiction;*
- 3. The Anti-Trafficking Office to improve the human trafficking statistics on the work of the police, the prosecution and the courts and to analyse the practices of these institutions, giving proposals for improvement;*
- 4. The competent institutions to draft rules for processing and protection of personal data for trafficking victims;*
- 5. The competent institutions, as soon as possible, to carry out activities aimed at building capacities of representatives of institutions involved in anti-trafficking efforts;*
- 6. The Anti-Trafficking Office to start implementing the GRETA recommendations relevant for human trafficking;*
- 7. The Anti-Trafficking Office to foster cooperation with nongovernmental organisations.*

While collecting the information on human trafficking we noted some institutions failed to respond within the timeframe stipulated. Therefore, we recommend the following:

- 1. The Anti-Trafficking Office to start proactively publishing all the relevant statistics and reports it compiles or receives from other institutions relevant for anti-trafficking efforts;*
- 2. the Police Directorate, the Ministry of Health, the High Court Bijelo Polje, the Basic Court Podgorica and the Office of the Ombudsman should improve actions taken as per the free access to information requests and to submit within the legally stipulated timeframe the requested responses on the progress of reforms they are in charge of.*

Annex: Responses of institutions to information requests (on 20 December 2013)

Institution	Total no of requests	Filing date	Response date	Appeal date	Appeal response date
INSTITUTION WHICH RESPONDED TO REQUESTS					
Anti Human Trafficking Office	6	12 July 2013	12 Nov 2013	24 Oct 2013	12 Nov 2013
Ministry of Justice	6	12 July 2013	26 July 2013	/	/
Ministry of Human and Minority Rights	5	12 July 2013	19 July 2013	/	/
Supreme State Prosecution	5	12 July 2013	15 Oct 2013	/	/
Ministry of Labour and Social Welfare	4	12 July 2013	22 July 2013	07 Aug 2013	01 Oct 2013
Ministry of Foreign Affairs and European Integration	4	12 July 2013	26 July 2013	/	/
Ministry of the Interior	3	12 July 2013	24 July 2013	/	/
National Security Agency	1	12 July 2013	24 July 2013	/	/
Supreme Court	1	12 July 2013	18 July 2013	/	/
Court of Appeals	1	12 July 2013	17 July 2013	/	/
High Court Podgorica	1	12 July 2013	22 July 2013	/	/
Basic Court Bar	1	12 July 2013	18 July 2013	/	/
Basic Court Berane	1	12 July 2013	22 July 2013	/	/
Basic Court Bijelo Polje	1	12 July 2013	25 July 2013	/	/
Basic Court Cetinje	1	12 July 2013	18 July 2013	/	/
Basic Court Danilovgrad	1	12 July 2013	17 July 2013	/	/
Basic Court Herceg Novi	1	12 July 2013	17 July 2013	/	/
Basic Court Kolašin	1	12 July 2013	16 July 2013	/	/
Basic Court Kotor	1	12 July 2013	18 July 2013	/	/
Basic Court Nukšić	1	12 July 2013	23 July 2013	07 Aug 2013	30 Sep 2013
Basic Court Plav	1	12 July 2013	18 July 2013	/	/
Basic Court Pljevlja	1	12 July 2013	22 July 2013	/	/
Basic Court Rožaje	1	12 July 2013	16 July 2013	/	/
Basic Court Ulcinj	1	12 July 2013	05 Aug 2013	/	/
Basic Court Žabljak	1	12 July 2013	16 July 2013	/	/
INSTITUTION WHICH FAILED TO RESPOND TO REQUESTS					
Police Directorate ¹⁵	12	12 July 2013	05 Aug 2013	24 Oct 2013	/
Ministry of Health	4	12 July 2013	/	24 Oct 2013	/
High Court Bijelo Polje	1	12 July 2013	/	24 Oct 2013	/
				14 Nov 2013	19 Dec 2013
Basic Court Podgorica	1	12 July 2013	/	24 Oct 2013	/
Ombudsman	1	12 July 2013	/	24 Oct 2013	11 Nov 2013

¹⁵ Following the amendments to the Law on Internal Matters, the Police Directorate is subordinated to the Ministry of Interior.