OSCE ODIHR
HATE CRIME REPORTING

Information contained in this report was compiled as part of ODIHR's 2025 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

2025

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 strengthen the effective prosecution of hate crimes through the adoption of the Binding Instruction on the Conduct of State Prosecutors' Offices in Cases of Hate Crimes and Hate Speech. However, based on the available information, ODIHR observes that Montenegro's hate crime recording and statistics do not sufficiently

distinguish hate crimes from other crimes, while numbers of hate crimes officially recorded by police, prosecuted and sentenced remain very low. 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

Six police-recorded incitement offences (under Article 370 of Montenegro's Criminal Code) were reported to ODIHR and excluded as falling outside the OSCE's hate crime definition. The prosecution figure refers to offences committed 'out of hatred' under Article 42a of the Criminal Code of Montenegro. Prosecuted figures include two cases of physical injury, three cases of threats and one case charged under Article 220(1) and (3) of the Criminal Code of Montenegro. Sentencing figures include one case of threat.

Year	Hate crimes recorded by police	Prosecuted	Sentenced
2025	0	6	1

National Developments

In 2025, Montenegro introduced Article 370a of the Criminal Code addressing 'Severe Hate Speech', which punishes public expressions of hatred against a group or a member of a group based on a defined list of protected grounds and in a manner that may lead to violence or cause hatred against the group or one of its members. The protected grounds include national or ethnic affiliation, "race" or religion, or the absence of such affiliation, nationality, differences in political or other belief, sex, language, skin colour, education, social status, professional orientation, social origin, sexual orientation, gender identity or disability, or any other personal characteristic.

On 9 May 2025, the Supreme State Prosecutor adopted the Binding Instruction on the Conduct of State Prosecutors' Offices in Cases of Hate Crimes and Hate Speech, which has been published on the website of the Supreme State Prosecutor's Office. The Instruction improves the system for recording, monitoring and reporting on criminal offences committed out of hatred and hate speech.

In December 2025, the Government of Montenegro adopted the Strategy for the Protection of Victims' Rights, together with the accompanying Action Plan. The Strategy represents a strategic document developed to ensure a long-term and systematic approach to public policy planning in the field of victims' rights. Its objectives are to strengthen the protection and support available to victims, improve access to justice for this particularly vulnerable category of persons, and ensure the continued alignment of national standards with relevant international standards and the recommendations of international monitoring bodies. The Strategy also seeks to raise awareness among both professionals and the general public regarding the vulnerability of victims, their specific needs, and the rights and protection mechanisms available to them.

In 2025, three hate crime training sessions focusing on violence against LGBTI persons were delivered to 48 judicial and prosecutorial candidates. The Centre for Training in the Judiciary and State Prosecution Service conducted a variety of hate crime-related activities, training 32 prosecution and judiciary members/candidates.

Incidents reported by civil society

For 2025, ODIHR received reports of hate incidents in Montenegro from the European Association of Jehovah's Witnesses and the UNHCR.

To learn more about the civil society organizations that report hate incidents to ODIHR, visit the Contributors page.

Individual incidents submitted by CSOs have been analysed by ODIHR. Those that are broadly considered to be hate crimes within the OSCE definition (criminal offence committed with a bias motive) are listed in the tables below according to the bias motivation category. Some incidents involved multiple biases and may be listed in multiple categories.

ODIHR's insights

For 2025, ODIHR received reports of two incidents that took place in Montenegro in the anti-Christian and racist and xenophobic bias motivation categories. The low number of incidents is not an indication that hate crimes are not taking place, only that they have not been reported to civil society or to ODIHR.
Please note that incidents reported here are based on voluntary civil society submissions and as such do not reflect the actual number of incidents or the most targeted communities in Montenegro.

To address under-reporting, ODIHR encourages any civil society organizations or groups that monitor hate incidents to report these to ODIHR at hatecrimereport@odihr.pl.

To export an Excel sheet with summaries of all incidents from Montenegro click here.

View civil society incidents for Montenegro, 2025