



iMM

**ANNUAL
REPORT**



Co-funded by
the European Union

2025

Independent Monitoring Mechanism – IMM

Zagreb ▪ Croatia

www.nmn.hr ▪ nmn@nmn.hr

© Independent Monitoring Mechanism (IMM), 2026

Zagreb, March 2026

Reproduction is authorised provided the source is acknowledged.

Co-funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union. Neither the European Union nor the Granting Authority can be held responsible for them.

2025

Annual Report

of the Independent Monitoring Mechanism

TABLE OF CONTENTS

READING THE IMM 2025 REPORT IN CONTEXT	3
EXECUTIVE SUMMARY.....	5
List of Abbreviations and Acronyms.....	9
List of Figures and Tables	11
Glossary of Terms.....	12
CHAPTER 1. INSTITUTIONAL ARCHITECTURE.....	18
1.1. Normative and Operational Framework	18
1.2. Organisational Structure and Expertise	22
1.3. Monitoring Missions and Operations.....	25
CHAPTER 2. METHODOLOGICAL ARCHITECTURE.....	29
2.1. Transposing the Monitoring Mandate into a Methodological Framework.....	30
2.1.1. Purpose, Scope and Target of Monitoring.....	30
2.1.2. Evidentiary Architecture and Data Sources.....	32
2.2. Sampling Methodology: Fundamental Rights Risk Assessment.....	35
2.3. Operational Methodology and Procedures.....	36
2.4. Data Collection Methodology, Instruments and Recording Standards.....	39
2.5. Reporting Methodology: Multilayer Verification and Quality Control.....	41
CHAPTER 3. KEY FINDINGS.....	44
3.1. Empirical Base and Monitors' Field Presence.....	46
3.2. Evidentiary Conditions and Monitoring Access	51
3.3. Substantive Monitoring Findings.....	53
3.3.1. Best Practices.....	54
3.3.1.1. Interview-Based.....	55
3.3.1.2. Location- and Facility-Based.....	58
3.3.1.3. Factoring in Monitors' Annual Reports	60
3.3.2. Challenges.....	61
3.3.2.1. Interview-Based.....	62
3.3.2.2. Location- and Facility-Based.....	63
3.3.2.3. Factoring in Monitors' Annual Reports	65
3.3.3. Irregularities in Individual Cases	66
3.3.3.1. Event-Triggered Detection	66
3.3.3.2. Monitoring-Triggered Detection.....	68
3.3.3.3. Notification-Triggered Detection.....	70
3.3.4. Qualitative Pattern of Irregularities.....	72
3.3.5. "Letter of Rights and Complaints" Procedure	74

3.4. Referrals and Follow-Ups on Irregularities	75
3.5. Migrants’ Health Care and Emergency Medical Services.....	77
3.5.1. Health Care and Documentation	77
3.5.2. Mortality of Migrants	81
3.5.3. Excerpts from Monitors’ Reports on Migrants’ Health and Health Care	81
3.5.4. Mental Health, Addictions and Psychosocial Support	82
3.5.5. EMS-Interventions Triggered by CSO-Notifications	84
3.6. Overall Assessment: Best Practices and Remaining Challenges.....	85
3.6.1. Notification Channels and Monitors’ Monthly Recommendations	85
3.6.2. Best Practices and Remaining Challenges	89
CHAPTER 4. ANNUAL RECOMMENDATIONS	94
4.1. Access to International Protection, Immediate Procedural Safeguards and Information.....	96
4.2. Temporary Accommodation, Protection-Sensitive Conditions and Vulnerability-Responsive Practice	97
4.3. Health Care, Emergency Medical Services and Psychosocial Support	98
4.4. Operational Support Conditions for Rights-Compliant Practice	99
4.5. Accountability, Complaints, Notification Channels and Follow-Up Obligations	100
4.6. Seamless Continuation and Further Consolidation of Independent Monitoring	101
ANNEX	
Annex 1. Cooperation Agreement – Consolidated Text (29/04/2025)	102
Annex 2. Summary Update on the IMM to the Advisory Board (30/01/2025)	110
Annex 3. AB IMM Recommendations on IMM’s Semi-Annual Report (27/03/2025)	117
Annex 4. IMM’s Response to the Advisory Board’s Recommendations (07/04/2025)	121
Annex 5. “Letter of Rights and Complaints” Pilot-Form	127
Annex 6. No Exhaustive Listing of Standards and Guidance on the Protection of Migrants’ Fundamental Rights in the Area of Border Management, Irregular Migration and International Protection	130
Annex 7. Detailed Listing of 2025 Monitoring Missions and Operations, incl. Dates, Locations/Facilities, Green Border Monitorings and Interviews	133
Publisher Information, Acknowledgements and Recommended Citation	137

READING THE IMM 2025 REPORT IN CONTEXT

Interpretive discipline in a politically loaded field is an essential precondition for an accurate reading of the 2025 Annual Report of the Croatian Independent Monitoring Mechanism (IMM). Border management, irregular migration, international protection and external monitoring in Croatia and across Europe remain legally, institutionally, publicly, politically and, at times, ideologically highly contested. In such a field, monitoring findings are particularly vulnerable to two opposite forms of misreading and subsequent instrumentalisation: they may be dismissed as too cautious to matter, or inflated beyond what the evidence can actually support. The Report therefore states methodological boundaries and interpretive rules expressly and, where necessary, reiterates them. It does so to protect its findings and their actual meaning, preserve their traceability and reduce the risk of their instrumentalisation.

The Report is neither a representative survey nor a total description of all 2025 encounters between police officers and migrants in Croatia. It is a risk-focused, traceable, evidence-based and triangulated monitoring Report built on targeted monitoring missions and operations, green-border monitorings, interviews with migrants, inspection of locations and facilities, documentation review, case-file analysis, follow-up requests, and multilayer internal verification and quality control. Its findings are therefore findings about the monitored sample and the monitored instances within it, drawn on the basis of a fundamental rights risk assessment. That is both a methodological limit and a methodological strength. It limits what may responsibly be generalised beyond the evidence. At the same time, it allows the Report to distinguish more carefully between what could be positively identified as a best practice, what could be identified as a recurring challenge, what reached the threshold of a detected irregularity, and what did not.

The same applies to the institutional role of the IMM. The IMM is a fully CSO-led external expert monitoring mechanism. It is not an investigative, prosecutorial or judicial body. It does not determine criminal, disciplinary or other liability with final certainty, nor does it replace the mandates of Mol's Internal Control Service, the State Attorney's Office, the Ombudswoman, or other competent domestic and international bodies. Its task is different and more specific: to monitor and oversee instances of police officers' actions towards migrants through observation, documentation, triangulation, assessment, recommendation, public reporting and, where necessary, referral of detected irregularities for competent investigations. Where the evidence indicates proper actions and functioning safeguards, the Report says so. Where it identifies shortcomings or challenges not reaching the threshold of an irregularity, it says so as well. The same distinction governs grievances, complaints or allegations raised by migrants in relation to police officers' actions during interviews or in written notifications, particularly concerning the use of force. Such statements form part of IMM's evidence base and are transparently disclosed throughout the Report as migrants' self-reported lived experience. They were not, in themselves, treated as detected irregularities. Where, after verification and triangulation, a potential irregularity in police officers' actions could not reasonably be ruled out, the matter was classified as a detected irregularity and referred for proper investigation.

A detected irregularity within the meaning of the IMM and this Report should therefore be understood correctly. It does not imply or mean that the IMM conclusively established any wrongdoing. It means that the available information, once checked against other sources and assessed within IMM's mandate, did not allow an irregularity in police officers' actions to be reasonably ruled out. In those circumstances, the matter is not treated as resolved or dismissed,

but as one requiring competent institutional follow-up through proper investigation. This threshold is deliberately different from, and far lower than, the threshold that commonly governs disciplinary, prosecutorial or judicial findings. The IMM's role is not to prosecute or adjudicate cases, but to ensure that credible indications of possible irregularities are not left outside the reach of proper investigation. That is why the Report distinguishes between detected irregularities in individual cases and a detected qualitative pattern of irregularities: both are monitoring classifications within the meaning of IMM's mandate, not accusations or adjudications of individual or institutional responsibility. For this reason, the Report occasionally repeats crucial methodological explanations that a purely thematic text would have stated only once.

In a less contested field and context, it might be enough to explain once how denominators were set, why repeated visits are not duplication, why not every negative indication is in itself adverse, or why applicability depends on legal status, procedural stage and location type. In this field however, those points shape the correct meaning of the findings themselves. Without them, repeated monitoring may be misread as duplication, a non-applicable variable may be misread as a shortcoming, a detected irregularity may be mistaken for a legal accusation or final adjudication, or a risk-based monitored sample may be treated as if it were a fully representative claim about all police officers' actions. The Report's methodological explicitness is therefore not ornamental, but one of the ways in which the Report ensures that its findings are institutionally actionable and publicly intelligible.

Read accordingly, the IMM 2025 Report does not support either of the two simplified narratives to which this field, and the wider politicised context around it, are particularly prone. IMM's 2025 findings support neither a claim of generalised non-compliance nor a claim of full compliance. What the findings do support is a differentiated and traceable assessment of the monitored instances in 2025: one that identifies a predominantly positive overall picture regarding police officers' actions towards migrants, while also recording remaining challenges, several detected irregularities in individual cases, a limited but substantively important qualitative pattern concerning timely access to international protection at certain border crossings, and certain areas requiring corrective or preventive institutional follow-up. The practical value of the Report lies precisely in that disciplined differentiation. It seeks to strengthen the protection of migrants' fundamental rights not through public rhetorical escalation, but through traceable findings, credible referrals and targeted recommendations to the MoI capable of triggering meaningful institutional improvements.

EXECUTIVE SUMMARY

The year 2025 marked a decisive phase in the consolidation of the Croatian Independent Monitoring Mechanism (IMM). Five years into its establishment, the IMM has not merely continued to exist as a formally mandated monitoring mechanism, but has translated accumulated experience, upgraded internal rules, clearer operational procedures, and strengthened organisational support into substantially stronger monitoring practice. In 2025, IMM's institutional, operational and methodological architecture became more coherent, more stable and more capable of producing traceable, differentiated and practically relevant findings and recommendations. This Report therefore offers not only the most comprehensive account of IMM's operations to date, but also the most robust evidence basis so far for assessing what independent expert monitoring in 2025 shows about MoI police officers' actions in the area of border protection, irregular migration and international protection.

That matters because the value of monitoring in this field depends not only on what is found, but also on the conditions under which findings are produced. IMM's mandate is demanding by design. It requires a CSO-led external expert mechanism to monitor police officers' actions in an area that is legally complex, politically sensitive, operationally challenging and methodologically vulnerable to overstatement as much as understatement. In such an area of engagement, the quality of the practical translation of IMM's mandate into field work, documentation, verification, internal quality control, referrals and public reporting is decisive. The central significance of 2025 lies precisely there: the IMM became more systematic in its field presence, more disciplined in its evidentiary handling, and more confident in distinguishing between best practices, remaining challenges and detected irregularities requiring competent institutional follow-up through proper investigations.

The 2025 monitoring cycle rested on a materially stronger empirical base than in previous mandate-periods. Throughout the year, the IMM conducted 53 monitoring missions and 204 monitoring operations, including 49 green-border monitorings and 52 interviews with migrants across Croatia. Monitoring in 2025 was conducted as a rule unannounced, with only exceptional prior announcements where this was operationally necessary. These figures, amounting to 3.8 times the number of on-the-spot checks and 3.31 times the number of mission days compared to the previous reporting period, are not presented as achievements in themselves, notwithstanding that monitors' frequent and regular unannounced field presence arguably does have a preventive compliance effect. The significance of these figures lies in what they made possible: broader geographical and institutional coverage, repeated observation across location and facility types, predictable continuity of monitoring, and a far more robust basis for a differentiated assessment of the monitored actions of MoI's police officers towards migrants.

The evidence base underpinning the Report is also methodologically much stronger. It combines field monitoring, interviews with migrants, inspection of locations and facilities, documentation review, case-file analysis, follow-up requests, information drawn from MoI's information system, and monitors' annual narrative reports. Monitoring missions and operations were informed by monitors' fundamental rights risk assessments (FRRA) and structured through standardised monitoring instruments, while reporting was subjected to built-in multilayer verification and quality control. This strengthened both the monitors' investigative initiative as well as their expert assessment autonomy. For migrant-level analysis, the substantive denominator is 50 unique interviewed migrants, while the 52 interview reports were retained for interview-operation variables. Repeated visits in the location and facility sample are not duplication, but an intended feature of IMM's monitoring design.

This matters because the Report's findings depend not only on the existence of data, but on correct denominators, correct counting units and correct interpretation of what each evidentiary layer can and cannot support.

The evidentiary conditions of IMM's monitoring improved substantially in 2025. Access to facilities, documentation and other monitoring-relevant sources was generally broad enough to support meaningful implementation of its mandate. Mol's statistical input became more timely and more useful for risk-based mission planning as a major, but not exclusive source of information for monitors' FRRAs. Operational arrangements for migrant interviews also improved significantly. Interpretation services were made available through the same practical mechanisms used by the Croatian border police. Prior interview arrangements enabled informed consent of interviewees to be provided in advance, reduced on-the-spot declines and delays, and made interviews less stressful for both interviewees and monitors. All interviews were conducted confidentially and without the presence of police officers. Relevant case files were made available on-the-spot and/or electronically, with additional follow-up information requested from the Mol through the IMM office. These are not marginal operational details. They directly affect the quality, reliability and traceability of the interview-based findings.

Within such a materially strengthened empirical and evidentiary framework, the 2025 monitoring cycle supports a predominantly positive overall picture of police officers' actions towards migrants within all the monitored instances. The monitored evidence points to generally functioning safeguards and broadly fundamental rights compliant actions of Mol's police officers. The overall picture that emerges is therefore not one of generalised disregard for migrants' fundamental rights, but one in which important fundamental rights safeguards appear operational and the monitored police practice, in the main, substantively proper. This is an important finding and should be stated clearly. It is not a residual conclusion reached by caution or compromise, but a conclusion supported by the evidence collected across all 2025 monitored instances.

At the same time, the Report does not support a picture of full compliance. The monitored instances also reveal recurring challenges, uneven implementation of certain fundamental rights safeguards, and areas in which institutional, procedural and operational consistency of best practices remained insufficient. That is visible in several parts of the Report: in access-to-procedure issues, in the unevenness of some immediate safeguards, in certain accommodation- and vulnerability-related shortcomings, in complaint visibility and follow-up, in health-care and psychosocial-support gaps, and in the support conditions necessary for police officers' rights-compliant practice to be implemented consistently in everyday operational settings. The Report's contribution lies precisely in refusing to simplistically collapse all these different layers and aspects into either one single reassuring or one single accusatory narrative.

The same differentiated reading applies to the Report's irregularity findings. In 2025, the IMM identified several detected irregularities in individual cases and, beyond those single cases, a very limited but still substantively important qualitative pattern of concern regarding timely access to international protection at certain border crossing points. This limited qualitative pattern should not be overread. It is not evidence of generalised denial of access to international protection, nor a claim of blanket unlawful practice. It is, however, treated as a serious and traceable finding because it concerns one of the most sensitive legal thresholds in the entire field of border protection, irregular migration and international protection. The Report therefore records it explicitly, while also insisting

on the interpretive discipline set out in the preceding context note: a detected irregularity as well as a qualitative pattern thereof is a monitoring classification within the meaning of IMM's mandate, not an accusation or a conclusive legal finding of any wrongdoing.

The 2025 cycle also made more visible a specific accountability and follow-up challenge in one sensitive part of IMM's mandate. The issue here is not a general lack of cooperation by the MoI, as the overall picture of its cooperation with the IMM remained sufficiently functional to enable a much stronger monitoring cycle than in earlier periods. The more precise finding is narrower: once notifications, possible irregularities, referrals or other sensitive matters entered the domain of follow-up requiring targeted documentary access and more traceable institutional response, the MoI-IMM cooperation framework remained under-specified and as a consequence occasionally unsatisfactory. The 2025 experience therefore points to the need for more clearly operationalised notification, referral and follow-up obligations on the side of the MoI in this part of the cooperation interface. That conclusion is important precisely because it is measured: it identifies a real weakness without overstating it into a general accusation.

Three practical developments introduced in 2025 are of particular significance for the future of independent monitoring. First, the establishment of public notification channels through IMM's electronic mailbox and online contact form considerably increased its early-warning capacity. Second, the introduction of monthly recommendations to the MoI gave the IMM a more timely and operationally useful follow-up tool than annual reporting alone can provide. Third, the successful piloting of IMM's "Letter of Rights and Complaints" procedure addressed a methodological and structural weakness inherent to any risk- and mission-based monitoring by creating a more representative sample and an earlier and more traceable point at which migrants are informed of their rights and may indicate possible complaints. Taken together, these innovations did not merely generate new outputs. They improved IMM's practical ability to connect monitoring, early information, traceability and institutional response, while inducing tangible innovations strengthening the protection of migrants' fundamental rights in real time.

IMM's annual recommendations follow directly from that evidentiary picture. They are not an abstract policy exercise detached from empirical findings. They translate into targeted recommendations the documented best practices that should be preserved, the recurring challenges that should be addressed, the accountability and follow-up weaknesses that should be corrected, and the structural lessons that should shape the independent monitoring under the Pact on Migration and Asylum. They are organised in six thematic clusters: access to international protection, immediate procedural safeguards and information; temporary accommodation, protection-sensitive conditions and vulnerability-responsive practice; health care, emergency medical services and psychosocial support; operational support conditions for rights-compliant practice; accountability, complaints, notification channels and follow-up obligations; and the seamless continuation and further consolidation of independent monitoring itself.

This final recommendation cluster on independent monitoring as such is of particular importance for both the MoI and the current EU fundamental rights context. IMM's 2025 monitoring advancements are not self-sustaining. They depend on preserving the pace, scope and methodological depth of monitoring achieved in 2025 and maintained into 2026, while carrying the strongest elements of that experience into the future IMM architecture to be established under the Pact. The Croatian experience now shows with greater clarity than before what a functioning independent expert

monitoring mechanism requires in practice: a stable mandate, workable cooperation arrangements, meaningful access, risk-based and methodologically explicit sampling, standardised instruments, structured evidence handling, internal verification and quality control, timely communication channels, and traceable recommendation, follow-up and referral procedures. That is also why the broader significance of the 2025 Report extends beyond Croatia. It is relevant not only as an account of what the IMM detected in 2025, but also as a practical contribution to the currently ongoing wider European effort under the Pact to design and enact independent fundamental rights monitoring mechanisms that are real rather than merely formal.

Taken as a whole, IMM's 2025 Report documents two closely connected developments. It documents all monitored instances in which the protection of migrants' fundamental rights appears, overall, stronger and more visible than the field's public narrative often suggests, while still affected by specific procedural, operational and accountability-related weaknesses that require prospective correction and continued attention. At the same time, it documents a significant strengthening of the IMM itself. These two developments cannot and should not be separated, as it is precisely the more coherent, systematic, disciplined and methodologically robust monitoring implemented in 2025 that makes it possible to provide a more differentiated, more credible, more authoritative and more practically relevant assessment of police officers' actions towards migrants than in previous years. That is the central executive conclusion of this Report. It is also the strongest argument for preserving what was built in 2025, correcting what remains weak, and carrying both into the next phase of independent monitoring under the Pact in Croatia and across the EU.

List of Abbreviations and Acronyms

AB IMM – Advisory Board to the IMM

AMIF – Asylum, Migration and Integration Fund

APS – Airport Police Station

Art. – Article

BC – Border Crossing

BMVI – Border Management and Visa Instrument

BPS – Border Police Station

CALS – Croatian Academy of Legal Sciences

CAMS – Croatian Academy of Medical Sciences

CBCS – Centre for Balkan Criminology and Security

CCD – Centre for Cultural Dialogue

Cooperation Agreement – Consolidated Text of the Cooperation Agreement for the Implementation of the Independent Monitoring Mechanism for the Protection of Fundamental Rights in the Actions of Police Officers of the Ministry of the Interior in the Area of Border Protection, Illegal Migration and International Protection (29/04/2025)

CPT – European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment

CRC – Croatian Red Cross

CSO – Civil Society Organisation

EC – European Commission

ECtHR – European Court of Human Rights

EMS – Emergency Medical Service

EU – European Union

FRA – European Union Agency for Fundamental Rights

Frontex' FRO – Frontex Fundamental Rights Office

FRRRA – Fundamental Rights Risk Assessment

GB – Green border

GPD – General Police Directorate of the MoI

IMM – Croatian Independent Monitoring Mechanism

IMM CB – IMM's Coordination Board

IMM under the Pact – Independent Monitoring Mechanism established pursuant Art. 10 of the Screening Regulation

incl. – including/include(s)

IOM – International Organization for Migration

MoI – Ministry of the Interior of the Republic of Croatia

MoI ICS – MoI's Internal Control Service

MoI IS – MoI's Information System

MPS – Maritime Police Station

NPM – National Preventive Mechanism

OG – Official Gazette

Para. – Paragraph

PS – Police Station

RC – Registration Centre

RCAS – Reception Centre for Asylum Seekers

RCF – Reception Centre for Foreigners

Screening Regulation – Regulation (EU) 2024/1356 of the European Parliament and of the Council of 14 May 2024 introducing the screening of third-country nationals at the external borders and amending Regulations (EC) No 767/2008, (EU) 2017/2226, (EU) 2018/1240 and (EU) 2019/817

SPT – Subcommittee on Prevention of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment

the Pact – Pact on Migration and Asylum

TRC – Transit Reception Centre

(T)RC – (Transit) Reception Centre

TRCF – Transit Reception Centre for Foreigners

UNICEF – United Nations Children’s Fund

List of Figures and Tables

Figures:

1. IMM's Institutional Architecture.....	23
2. Monthly Distribution of 2025 Monitoring Missions (Mission Days; N=53)	46
3. Monthly Distribution of 2025 Monitoring Operations (N=204).....	47
4. Monthly Distribution of 2025 Green Border Monitorings (N=49).....	47
5. Monthly Distribution of 2025 Migrant Interviews (N=52).....	48
6. Monthly Composition of IMM's 2025 Evidence Base: Type of Operation (N=204)	53

Tables:

1. Evidentiary Architecture: Triangulation Across Data Source Categories	32
2. Classification of IMM's Data Sources with Description and Methodological Use.....	33
3. Interviewed Migrants: Sex and Age (N=50)	49
4. Number of Examinations in RCF Ježevo (01/01/2025–31/12/2025).....	80
5. Number of Examinations in TRC Tovarnik (01/01/2025–31/12/2025)	81
6. Number of Deceased Migrants; Estimate for 2025	81
7. Overview of EMS-Interventions Following Notifications Received by the IMM	84
8. Expressed Intentions and Submitted Requests for International Protection	90
9. 2025 Monitoring Missions and Operations by Date and Location.....	134
10. 2025 Monitoring Operations: Migrant Interviews by Date and Location.....	135

Glossary of Terms

Previous IMM reports and normative frameworks have not always used terminology consistently. In order to ensure terminological clarity, methodological transparency and a correct reading, the key terms used throughout the 2025 Report are defined below. The glossary is intended to clarify how these terms are used in the specific context of IMM's mandate, methodology, findings and recommendations. It should therefore be read together with the section [Reading the IMM 2025 Report in Context](#) and the [methodological chapters](#) of the Report. The terms below are listed in a reader-led rather than alphabetical order, reflecting their relevance to IMM's mandate and to the internal logic of the Report: first the core monitoring concepts, then the institutional and procedural framework within which the IMM operates, followed by the principal methodology-, findings- and innovation-related categories used throughout the Report.

Core Monitoring Concepts

Monitoring – umbrella term covering the monitoring activities, monitoring operations and monitoring missions through which the IMM monitors, documents, assesses and reports on the actions of MoI's police officers in the area of border protection, irregular migration and international protection.

Monitoring Mandate – the mission- and rule-based scope of IMM's work as defined primarily by the Cooperation Agreement and further operationalised through IMM's methodology. In substantive terms, the mandate is to contribute to the respect of migrants' fundamental rights by monitoring the actions of MoI's police officers in the area of border protection, irregular migration and international protection, with special emphasis on the principles of non-refoulement, the prohibition of collective expulsion, and the prohibition of torture or other forms of ill-treatment. In operational terms, the mandate covers monitoring, documentation, assessment, recommendation, public reporting and, where necessary, referral.

Monitoring Activity – an oversight activity targeting the actions of MoI's police officers in the area of border protection, irregular migration and international protection, conducted by IMM monitors at or in relation to the external border of the Republic of Croatia, incl. the green border and, as operationally covered in 2025, also the blue border and the air border; at border crossing points, incl. airport border crossing points; in police stations, including border, maritime and airport police stations, and in police administrations of the Republic of Croatia along the borders with Bosnia and Herzegovina, Montenegro and the Republic of Serbia; and in reception centres, registration centres, reception centres for asylum seekers, and reception or transit centres for foreigners. Oversight activities may be conducted either directly (in vivo), through announced or, as a rule, unannounced on-the-spot checks, incl. observation/shadowing of police officers' actions and inspection of facilities and conditions, or indirectly, through case-file analysis, analysis of data contained in the MoI IS, interviews with migrants, interviews with police officers, and analysis of the activities and reports of the GPD concerning alleged unlawful actions towards irregular migrants and applicants for international protection.

Monitoring Operation – the continuous implementation of one or more target-specific monitoring activities relating to one monitoring location, facility, case or monitoring target. More than one monitoring operation may be conducted at the same location or facility where the monitoring target differs, for example where one operation concerns interviews with migrants and related case-file analysis, while another concerns the inspection of facilities, conditions and related documentation.

Monitoring Mission – the continuous implementation of one or more monitoring operations, usually during one mission day and commonly across more than one monitoring location or facility. In IMM’s methodology, the monitoring mission is the broader operational unit within which one or more operations are planned, conducted and documented.

IMM Monitor – an individual expert directly implementing IMM monitoring activities appointed by one of the CSOs constituting the IMM-consortium. In the terminology of the Cooperation Agreement and IMM Project, monitors are also referred to as (direct) implementers of oversight activities or direct activity providers. The Report consistently uses only the term monitor.

Institutional and Procedural Framework

Cooperation Agreement – the Consolidated Text of the Cooperation Agreement for the Implementation of the Independent Monitoring Mechanism for the Protection of Fundamental Rights in the Actions of Police Officers of the Ministry of the Interior in the Area of Border Protection, Illegal Migration and International Protection, adopted on 29 April 2025. It is the IMM’s founding charter and basic governing normative framework.

IMM – the Croatian Independent Monitoring Mechanism: a fully CSO-led external expert monitoring mechanism established on the basis of Art. 5(7) of the State Border Surveillance Act and operating on the basis of the Cooperation Agreement.

IMM-Consortium – the normative and organisational configuration of the IMM as constituted by the signatories to the Cooperation Agreement: five CSOs with distinct areas of expertise relevant to IMM’s mandate, and one individual expert.

IMM Member – an individual expert engaged in IMM’s work either as a member of IMM’s Coordination Board or as an IMM monitor and vested, through the Cooperation Agreement and IMM’s procedures, activities and outputs, with mandate-relevant independent and autonomous decision-making competences in the fulfilment of IMM’s mission.

IMM Associate – an individual professional engaged in IMM’s work through Coordination-Board-assigned administrative, logistical, analytical, financial, communication, operational or other support tasks necessary for the implementation of IMM’s mission, but without any independent or autonomous decision-making competences within the meaning of IMM’s mandate.

IMM Coordination Board – the body that professionally directs and manages the activities of the IMM. Under the Cooperation Agreement, it is composed of one expert representative per CSO signatory and Prof. Dr. Iris Goldner Lang. It coordinates the IMM’s work, manages its outputs, adopts expert reports and recommendations, appoints associates, and conducts the referral and follow-up functions entailed in IMM’s mandate. The Head of the Coordination Board presents and represents the Coordination Board, coordinates the IMM’s activities, convenes the meetings of the Coordination Board and, based on the periodic work reports, presents IMM’s activities to the Advisory Board to the IMM and to the MoI.

Advisory Board to the IMM – the external advisory body to which the IMM provides periodic and annual reports and from which it receives expert recommendations aimed at strengthening the independence and functioning of its work.

IMM under the Pact – the independent national monitoring mechanism to be established in line with Art. 10 of the Screening Regulation as part of the Pact on Migration and Asylum. In the Report, the term is used comparatively and prospectively when distinguishing Croatia’s current IMM from the future monitoring architecture to be established under the Pact framework.

IMM Project – the project-based implementation, funding and support framework anchored in Art. 10 of the Cooperation Agreement, through which IMM’s activities are operationally and financially secured. As used in the Report, the term refers to the MoI-administered project framework through which relevant EU funds are used to cover the costs of implementing IMM’s mission and mandate, incl. contracts, procurements, reimbursements and related administrative, logistical and support structures. The term does not denote a separate institutional or operational architecture, nor does the project-based setup have any substantive bearing on IMM’s independence as a fully CSO-led external expert monitoring mechanism.

Scope, Target Group and Monitored Settings

Migrant – for the purposes of the Report, a person who moves away from their place of usual residence across an international border, temporarily or permanently, voluntarily or involuntarily, and for a variety of reasons. The definition is adapted to IMM’s mandate by focusing on international rather than internal migration.

Irregular Migrant – a third-country national or stateless person who has crossed or attempted to cross the state border of the Republic of Croatia outside a border crossing point or across a border crossing point outside operating hours, or who circumvents border control or leaves the area of a border crossing point before border control procedures have been completed. The term is used in line with Art. 2 of the Cooperation Agreement.

Applicant for International Protection – a third-country national or stateless person who declares an intention to apply for international protection until the decision on the application becomes enforceable. The term is used in line with Art. 2 of the Cooperation Agreement.

Green Border – the external land border of the Republic of Croatia with Bosnia and Herzegovina, Montenegro and the Republic of Serbia, as defined in the Cooperation Agreement.

Blue Border – for the purposes of the 2025 Report, the maritime dimension of Croatia’s external border in so far as it became operationally relevant to IMM monitoring in 2025, particularly through monitoring activity at the Maritime Police Station Dubrovnik.

Air Border – for the purposes of the 2025 Report, the airport-related dimension of Croatia’s external border in so far as it became operationally relevant to IMM monitoring in 2025, particularly through monitoring activity at Airport Police Station Čilipi.

Core Methodological Concepts

Fundamental Rights Risk Assessment (FRRA) – the structured expert assessment through which IMM monitors identify, prioritise and select locations and facilities, timing, targets and types of monitoring on the basis of fundamental-rights-relevant risk indicators, contextual information and available data. The FRRA informs IMM’s risk-based sampling and is therefore a core methodological tool rather than a substantive finding in itself.

Risk-Based Sampling – the methodological selection of monitoring missions, operations, locations, facilities, timing and monitoring targets on the basis of the monitors’ FRRA, relevant Mol data, geographical coverage, continuity of field presence, contextual information and other mandate-relevant considerations. It is not intended to produce a representative statistical sample, but a monitoring sample capable of generating traceable and substantively meaningful findings of particular relevance for IMM’s mission and mandate.

Monitored Sample – the aggregate of all monitored instances, operations, locations, facilities, files, interviews and other evidence sources actually covered by IMM monitoring during the relevant reporting period. It defines the evidence-based reach of the Report’s findings. The findings therefore relate to the monitored sample and the monitored instances within it, not to all Mol police officers’ actions towards migrants in Croatia in 2025.

Evidentiary Architecture – the structured combination of evidence sources, datasets, instruments and verification steps through which IMM monitoring generates traceable findings. In the 2025 Report, this architecture incl. on-the-spot checks, location and facility inspections, interviews with migrants, conversations with police officers and facility staff, documentation review, case-file analysis, Mol IS data analysis, follow-up requests and information, notification-derived information and monitors’ annual narrative reports.

Triangulation – the methodological cross-checking of information across more than one source, dataset, monitoring activity, case file, report or evidentiary layer in order to increase reliability, reduce overreliance on any one source and strengthen the traceability of findings, assessments and referrals.

Verification – the methodological process of checking, clarifying and assessing the reliability, consistency and relevance of collected information before it is used in monitoring findings, assessments, recommendations or referrals.

Internal Quality Control – the multilayer internal review process through which mission- and operation-level documentation, findings, assessments and recommendations are checked for consistency, evidentiary support, definitional accuracy and traceability before being used in higher-level outputs, incl. referrals, annual findings and recommendations.

Interview Record – one completed interview-operation record in the migrant interview dataset. In 2025, the interview dataset contains 52 interview records. For interview-operation variables, the relevant denominator is therefore 52.

Unique Interviewed Migrant – the substantive counting unit for the main migrant-level analysis in the Report. In 2025, after application of the duplicate rule, the number of unique interviewed migrants is 50. The Report’s substantive interview-based findings are therefore grounded in this denominator rather than in the total number of interview records.

Interview Dataset – the dataset comprising the 2025 interview-operation records. It is used primarily for variables concerning interview conditions and modalities, such as interpretation, confidentiality, police presence, informed consent and related operational monitoring aspects.

Location/Facility Dataset – the dataset covering location- and facility-based monitoring operations. It is record-based rather than site-based. Repeated visits to the same location or facility are therefore not duplication, but part of the monitoring design and of the logic of cumulative oversight throughout 2025.

Applicability – the methodological principle that not every variable, question or indicator is relevant in every monitored instance. Whether a variable is applicable depends on legal status, procedural stage, location or facility type and the factual circumstances reflected in monitors’ notes, narrative fields and the monitored context. Not every negative indicator is therefore adverse in itself.

Duplicate Rule – the report-specific rule applied in the substantive migrant-level analysis according to which duplicate interview cases are not double-counted. Where the same migrant was interviewed more than once, only the most recent and therefore most comprehensive interview record and corresponding assessment were retained for substantive analysis.

Core Findings Categories

Best Practice – a monitored practice, safeguard, procedure, organisational solution or mode of conduct that the available evidence supports as functioning well and as contributing positively to the protection of migrants’ fundamental rights. Within the Report, best practices are not abstract ideals, but empirically grounded findings that should be preserved, supported and, where useful, further standardised by the Mol.

Challenge – a monitored shortcoming, weakness, inconsistency, operational strain or other issue relevant to the protection of migrants’ fundamental rights that does not reach the threshold of a detected irregularity, but nevertheless warrants attention, corrective action, further monitoring and/or improvement-oriented recommendations to the Mol.

Detected Irregularity – a monitoring classification used where, after verification and triangulation of the available information, a potential irregularity in Mol police officers’ actions could not reasonably be ruled out. A detected irregularity does not mean or imply that the IMM conclusively established wrongdoing. It signifies that the available information reached the threshold at which the matter had to be documented, classified and referred to the competent authorities for proper investigation and institutional follow-up.

Qualitative Pattern of Irregularities – a repeated, traceable and substantively relevant recurrence of similar detected irregularities or irregularity-relevant indications across more than one monitored instance, location, facility, operation or source, such that the matter cannot be read as single or completely isolated. Within the meaning of the Report, a qualitative pattern is not a statistical category and should not, in itself, be read as evidence of a documented or systematic practice, but as a monitoring classification derived from cumulative triangulation and repeated expert assessment.

Overall Assessment – the synthesising assessment in which the Report draws together the main findings from the substantive findings sections, referral and follow-up experiences, and the health-related chapter in order to identify the principal best practices, remaining challenges and recommendation-relevant clusters emerging from the 2025 monitoring cycle’s evidence basis.

Complaints, Notifications, Referrals and Follow-Ups

Complaint – an expression of objection to conduct or treatment perceived as unfair, unlawful, inappropriate or otherwise not in line with applicable standards. The IMM is not a complaint-based or complaint-deciding mechanism and does not conduct legally binding complaint proceedings. In the context of IMM’s work, complaints may arise as information provided by migrants during interviews, through IMM’s notification channels, or through other sources, and commonly inform monitors’ FRRA, monitoring operations, findings, recommendations and referrals. Where the term is used in its formal legal meaning, this is clear from context.

Notification – information communicated to the IMM through its electronic mailbox, online contact form or other communication channels concerning alleged or possible fundamental rights violations, irregularities, risks, incidents or other matters relevant to IMM’s mandate. Notifications do not constitute proof in themselves and do not transform the IMM into a complaint-based mechanism. Within IMM’s methodology, they function primarily as contextual and early-warning inputs requiring verification and, where appropriate, follow-up, adjustment of sampling priorities, urgent information requests, or notification-triggered monitoring operations.

Referral – the formal communication by the IMM Coordination Board of a detected irregularity requiring competent institutional examination to the relevant state authority or authorities, primarily for the purpose of proper investigation and follow-up.

Follow-Up – all activities undertaken after a monitoring mission, operation, recommendation, notification or referral in order to obtain additional information, verify developments, assess whether relevant action was taken, or determine whether further monitoring, recommendation or referral is necessary.

Competent Authorities – the domestic or, where relevant, international authorities legally competent to record, investigate, process, examine or otherwise follow-up matters falling outside IMM’s own mandate to determine individual and/or institutional legal responsibility and liability. Depending on the issue, these may incl., for example, the Mol ICS, the State Attorney’s Office, the Ombudswoman, the NPM or other bodies with the relevant mandate.

2025 Operational Innovations

“Letter of Rights and Complaints” Procedure – the IMM’s 2025 pilot procedure through which migrants were informed, at an early and traceable stage, of relevant rights and given the possibility to file complaints or concerns related to Mol police officers’ actions. Within the Report’s methodology, this procedure is important not only because it may facilitate complaints, but because it strengthens early rights-awareness, improves traceability, reduces the time gap between a possible incident and its later documentation or investigation, and enables a broader and more representative evidentiary picture than mission-based interviewing or risk-based monitoring alone. The completed form becomes part of the migrant’s case file and, where a complaint is filed through this procedure, triggers the Mol ICS procedure as well as IMM oversight.

Monthly Recommendations – the structured practice introduced in early 2025 through which the IMM Coordination Board communicates monitors’ recommendations to the Mol following each mission reporting cycle on a monthly basis, rather than waiting for the annual reporting cycle. The procedure strengthens timeliness, specificity, operational usefulness and traceable follow-up.

1. INSTITUTIONAL ARCHITECTURE

Since its establishment five years ago, the IMM has maintained its institutional setup and independence as a CSO-led fundamental rights monitoring mechanism. It has no affiliation to Croatian state authorities, particularly not to the MoI being the state body in charge of border management and international protection, and hence the subject of IMM's oversight mandate. Likewise, IMM's normative framework remained stable over the years, with consecutive upgrades of the Cooperation Agreement concluded between the IMM-consortium and the MoI, reflecting its operational maturity. The reporting period is marked by major advances in IMM's operational framework, particularly when it comes to monitoring capacities and methodology. The following chapters provide an overview of IMM's normative and organisational architecture ([Chapters 1.1.](#) and [1.2.](#)), with a focus on the core of IMM's operations: the monitoring missions ([Chapter 1.3.](#)). Such an overview is crucial for understanding how IMM's institutional architecture, comprised of its normative, organisational and operational setup, transposes into its overall methodological architecture ([Chapter 2](#)) and subsequently impacts IMM's findings ([Chapter 3](#)) as well as the annual recommendations derived from them ([Chapter 4](#)). While enabling a correct reading of both the 2025 key findings and the annual recommendations, the following chapters also illustrate how and why normative, organisational and operational design largely pre-set monitoring methodology as well as findings, which should be of particular interest to any EU member state currently launching IMMs under the Pact. In view of this broader Croatian and European context, and as a contribution to the respect of fundamental rights, the sections below also incl. a selection of lessons learned from five years of IMM's pioneering work and hands-on monitoring experience, enabling policymakers, experts and practitioners in the field to draw on what provenly works best, while avoiding some of the challenges the IMM faced.

1.1. Normative and Operational Framework

The IMM is established pursuant to Art. 5(7) of the State Border Surveillance Act (Official Gazette 83/13, 27/16, 114/22, 151/22) and operates on the basis of the Cooperation Agreement concluded between the IMM-consortium on the one side and the MoI on the other ([Annex 1](#)). The IMM is normatively set up as a consortium of five CSOs, each with a specialised area of expertise relevant to IMM's mandate, and an individual expert. Each CSO provides one expert to the IMM CB, which manages and coordinates the IMM, and two experts to the Monitor Team conducting the field missions and making all mandate-relevant assessments in each monitored instance. This totals 16 IMM members (6 IMM CB members and 10 monitors), who are assisted by 4 IMM associates providing administrative, logistical, accounting and communication support through the IMM Office (Figure 1 in [Chapter 1.2.](#)).

The Cooperation Agreement acts as IMM's founding charter, defining IMM's mission and mandate, the consortium as such, internal roles and external responsibilities as well as modalities of cooperation with the MoI, the AB IMM and other relevant stakeholders. Most importantly, it provides the IMM with a robust normative anchor by setting its objective to contribute to the respect of fundamental rights by monitoring the actions of police officers of the MoI, in the area of border protection, illegal migration and international protection, with special emphasis on the respect of the principle of non-refoulement, prohibition of collective expulsion, prohibition of torture or other forms of ill-treatment (Art. 1). Said normative anchor has been crucial not only for clearly determining IMM's mandate with regards to substance and scope, but also for delineating IMM's mandate from other competent authorities' mandates, particularly when this is granted on the basis of higher-

ranking legal norms, as is for example the case with the State Attorney's Office, the Police, the Mol ICS, the Ombudswoman and the NPM, the SPT, or the CPT. Such authorities' legal framework, although not directly applicable to the IMM, is nevertheless of crucial importance, as it forms a complex legal and therefore also an operational ecosystem in which IMM's normative and operational architecture is embedded in.

Accordingly, the IMM is best understood as any other CSO engaged in monitoring Mol's police officers' respect for migrants' fundamental rights, whereas what makes it unique is Mol's self-commitment to provide the IMM with a special oversight and investigative authority, which is otherwise reserved for (supra)national (state) bodies. These unique oversight and information-access powers grant the IMM its monitoring insight into Mol police officers' actions in the area of border protection, illegal migration and international protection, necessary to detect best practices, as well as challenges and irregularities, with the objective to refer identified irregularities to the competent authorities for investigation, and to publicly issue its recommendations to the Mol. Due to the nonexistence of a comparable CSO-led police-oversight and -monitoring model in the area of border management and migration, there is no normative, operational or methodological blueprint the IMM can rely on, notwithstanding that particularly throughout 2025 the CPT and Frontex' FRO served as guidance for designing IMM's internal normative framework and upgrading certain aspects of its monitoring methodology and field operations. Insofar, the IMM has over the previous years been continuously 'learning by doing', figuring out what works best and what does not in real time, whereas 2025 was marked as a year of normative consolidation, as shall be briefly addressed in the following sections.

The current Cooperation Agreement is the result of a gradual consolidation process. Following the IMM's establishment in June 2021, a 1st fixed-term one-year mandate ran from 08/06/2021–08/06/2022, marked by a published [1st Semi-Annual](#) (12/2021) and [1st Annual Report](#) (07/2022), the latter being based on 20 monitoring missions overall. Then for almost half a year (09/06/2022–03/11/2022) the IMM was forced to pause its operations while a new cooperation agreement was being discussed and drafted, but without involvement of the IMM CB itself. This lack of IMM CB consultations later on proved quite disadvantageous for the IMM, concerning many of the introduced novelties, whose purpose and operational implementation were not meaningfully factored in, nor discussed with the IMM CB. The 2nd mandate period (04/11/2022 – present) was again set for an initial fixed-term, now lasting two years instead of one, with the explicit possibility for an automatic indefinite extension, in order to avoid another halt of IMM's operations in-between drafting and adopting consecutive cooperation agreements.

From a normative and operational perspective, said automatic extension, applicable as of 04/11/2024, is highly important, as it provides a stable institutional horizon necessary for investing in long-term infrastructures of independent fundamental rights monitoring and for sustaining a consistent and methodologically sound monitoring implementation. The lack of such stability in turn invites ad-hoc solutions, improvisation and short-term approaches, all of which effectively undermine long-term strategic planning and resource intensive investments in developing data systems, continuous training, robust working procedures and external cooperation, to name but a few.

During the first part of its currently running 2nd mandate, lasting almost 2 years (11/2022–11/2024), the IMM faced considerable challenges which eventually led to delays in conducting monitoring missions and in publishing findings and recommendations, which was further complicated by the Head of IMM CB resigning in 09/2023 as well as the AB IMM halting its engagement with the IMM as of 07/2024. All these challenges have been transparently addressed in IMM's [2nd Semi-Annual Report](#) (07/2024, respectively 12/2024), whereas all issues concerned were successfully resolved in 12/2024 and 01/2025 leading to a full relaunch of IMM's operations of which the AB IMM was also promptly and in detail informed ([Annex 2](#)) thus enabling the reengagement of the AB IMM with the CB IMM under the chairing of Frontex' FRO ([Annex 3](#) and [4](#)). Said reengagement ultimately strengthened IMM's mission by supporting another round of upgrades to the Cooperation Agreement in 04/2025, ensuring that monitoring missions are consistently implemented until 07/2026 and that non-implementable or outgrown provisions are revised meaningfully.

As the previous brief overview vividly illustrates, the normative architecture itself has a major impact not only on the monitoring mandate as such, but it significantly impacts the quality, consistency and efficiency of how that mandate is translated into actual practice. This, in terms of lessons learned, is highly important and evidences that the normative design of any comparable monitoring model needs to be incorporated into existing (supra)national legal frameworks, while ensuring that normative provisions are actually implementable in terms of available resources as well as real-life operational practicalities, necessitating the active involvement of experts and practitioners in the normative design process from the very onset, or at least planning for flexibility and revisions once the normative framework has been tested in practice. Otherwise, the normative architecture of any monitoring model, instead of providing a firm anchor for the monitoring mandate, those conducting the monitoring and those being monitored, is likely to undermine the monitoring mission as such as well as the meaningfulness of its operations.

Now, beyond establishing the 'existence' of IMM's mandate, the Cooperation Agreement also contains numerous provisions that are both operationally and methodologically consequential. It sets out, for example, that the IMM shall conduct 20 monitoring missions annually, that monitoring is confined to the external border, and that the Mol shall provide data necessary for monitoring and risk-based sampling, such as monthly statistical reports and forward-looking risk parameters. At the same time, the Cooperation Agreement is—by design—a normative, not an operational or methodological framework. Although it defines the 'what' (e.g., missions, scope, locations), the 'how' (e.g., monitoring modalities) and the 'interface' (e.g., cooperation modalities), it does not specify every detail (e.g., evidence production, triangulation, assessment or follow-up). Insofar the normative framework obviously predefines basic operational and methodological parameters, but within these fixed preconditions it is eventually the methodologically robust transposition of the monitoring mandate into monitoring practice which ultimately ensures that it may have an impact on protecting and advancing migrant's fundamental rights, given the necessary resources have been adequately allocated. In this regard it is important to know that IMM's funding is operationalised via the Mol acting as the beneficiary of relevant EU funds necessary to implement IMM's mission and mandate via the IMM Project (e.g., AMIF, BMVI). Given that CSOs or consortia thereof are not eligible to apply directly for certain EU funding instruments, the Mol's competent department administers these funds and covers all IMM expenses through service/copyright contracts and, where appropriate, direct procurement or reimbursements of goods and services. It is essential to stress that neither IMM members nor associates are Mol employees or in any way affiliated to the Mol. All individual contracts contain explicit independence clauses, whereas the

directional authority over IMM associates' work lies exclusively with the IMM CB's (Deputy) Head and IMM CB Secretary.

While the contractual and funding framework safeguards IMM's overall institutional as well as individual IMM members' and associates' independence from the Mol, it has pre-2025 also been a source of operational friction. Delays in administrative processing and the absence of stable logistical support structures have until 12/2024 repeatedly directly impeded IMM's ability to fully maintain its mission frequency and the operational capacity necessary for implementing meaningful oversight without interruptions and delays. One of the key practical achievements of 2025 therefore lies not only in the strengthening of methodological and analytical capacities, but equally in the consolidation of IMM's operational backbone—administration, logistics, data infrastructure, accounting and communication channels—without which a monitoring mechanism of this size and scope of mandate cannot function. In this context, the period between 2023 and end of 2024, as noted previously, constituted an operational low point for the IMM, marked by recurrent project-management, accounting, contracting and reporting delays and by a lack of administrative and logistical support.

Following IMM's reorganisation initiated in 12/2024 and reflected in the IMM Project the Mol contractually settled all its obligations towards IMM members and associates until 30/06/2026 and any outstanding remunerations for previously implemented IMM activities. This enabled the IMM to move from crisis management to institutional consolidation ([Annex 2](#)). In parallel, the Head of IMM CB in 12/2024 and 01/2025 conducted a systematic upgrade of IMM's normative, methodological and operational framework factoring in the relevant European fundamental rights monitoring standards and best practices, particularly FRA's Guidance on independent monitoring mechanisms and the applicable CPT standards ([Annex 6](#)). This has thus been a continuous upgrade-task throughout 2025, informing both the monitors' FRRAs as the basis for implementing monitoring missions and operations, as well as the analysis of their reports' assessments and the design of IMM's recommendations.

Several operational upgrades introduced as of 2025 are particularly noteworthy. First, a structured information security framework was introduced. All IMM members and associates underwent obligatory information security briefings, received the necessary security clearances for accessing and handling restricted Mol data, and signed mandatory declarations on confidentiality, independence and impartiality, professional integrity, own responsibility and (potential) conflict of interest. The latter as introduced in 01/2025 was not merely a compliance measure, but a basic precondition for credible oversight in an environment where access to sensitive data sources is essential for traceable assessments. Second, communication channels and data infrastructure were securely established. Dedicated IMM email accounts were created for all IMM members and associates, reducing reliance on non-IMM private/professional email channels and increasing data protection. In addition, the IMM website was made publicly available and in 01/2025 administrative access was granted to authorised IMM associates, enabling systematic publication of news and the operation of a public contact form as an additional IMM-notification channel. These upgrades are highly important operational safeguards, as a monitoring mechanism without protected communication channels and a secure data storage infrastructure is structurally vulnerable, in terms of its practical independence, evidentiary integrity, operational efficiency and data protection standards. Third, administrative and logistical support, financial reporting workflows and overall supportive capacities were considerably strengthened: IMM associates were recruited and trained

on the job; workflows for activity reporting and deliverable submission were defined in cooperation with the Mol to ensure auditable and timely funding; and IT capacities were institutionalised in a manner that allows the IMM to maintain transparency towards the interested public via its website while respecting confidentiality regimes.

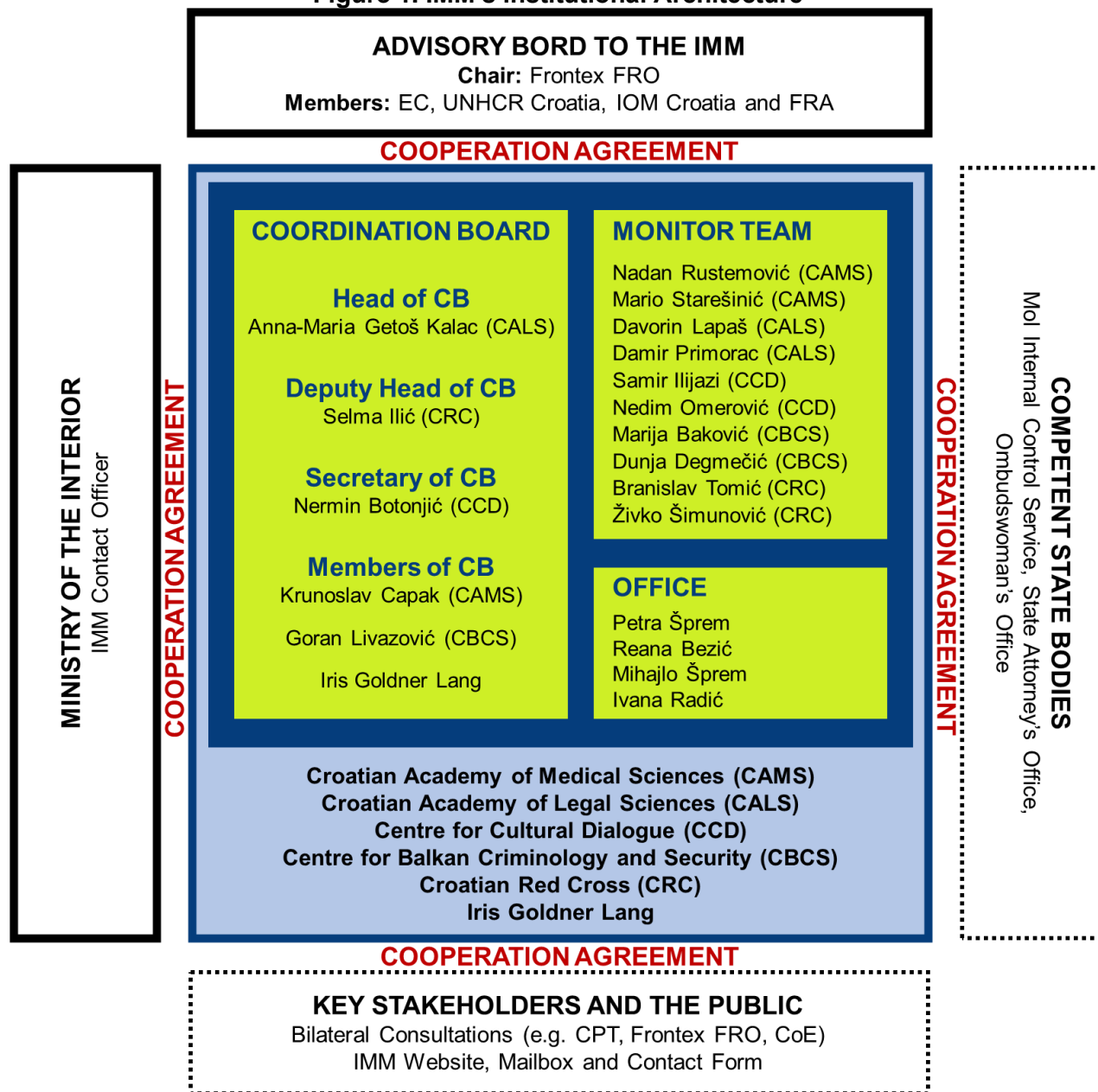
Taken together, said upgrades addressed a core structural issue of the IMM's earlier period in which the IMM CB members needed to perform basic administrative and logistical tasks 'in addition' to strategic and operational monitoring management and analytical tasks. Finally, and most decisively for operational methodology, in the first half of 2025 internal IMM Working Procedures were adopted by the IMM CB, codifying existing best practices and systematically formalising rules that had previously existed only as informal understandings, while using the CPT's Rules of Procedures as a guiding role model. This was followed by the adoption of an internal Manual for Monitors in mid-2025, designed to harmonise field practice, clarify mission procedures, and consolidate methodological innovations introduced and piloted in early 2025. In other words, 2025 was the year in which the IMM transitioned from a mechanism 'existing by mandate' to a mechanism 'operating by method'.

The just presented and many more of the 2025 normative and operational upgrades were introduced while simultaneously relaunching and intensifying IMM's monitoring missions, as well as the AB IMM's Recommendations, all of which the IMM committed to implement ([Annex 2](#), [3](#) and [4](#)). Additional bilateral exchanges with relevant expert actors in early 2025, incl. the CPT and Frontex' FRO, were extremely useful in ensuring that IMM's relaunch was not merely swift, but structurally upgraded in light of European best practices and accumulated lessons learned by the competent bodies with extensive hands-on fundamental rights monitoring experience. These bilateral exchanges as well as others throughout 2025 and early 2026 also confirmed that there is no available 'methodological blueprint' for fundamental rights monitoring in the context of police border management and migrations, that might simply be adopted and merely adjusted to national particularities, but that the methodological architecture needs to be built from the ground up, while drawing from existing internal and external practical experiences and lessons learned.

1.2. Organisational Structure and Expertise

As already highlighted, the IMM is a fully CSO-led monitoring mechanism, operating independently and autonomously of any Croatian state body, particularly the Mol. It is set up as a consortium of CSOs and an individual expert, with the Cooperation Agreement specifying the IMM's internal organisational structure, the scope and modalities of external relations and cooperation with the Mol, the AB IMM, competent state bodies, key stakeholders and the interested public ([Annex 1](#)). The institutional architecture is designed to combine independence and autonomy with operational efficiency. The IMM CB provides governance, strategy, expert management, methodological framing, internal quality control, institutional follow-up and overall analytical coverage. The Monitor Team performs the core monitoring oversight activities (missions and operations) and delivers operation-level findings, assessments and recommendations. The Office provides the administrative, logistical, analytical and documentation infrastructure necessary for sustained field presence and traceability of monitors' evidence packages, serving as the practical enabler of monitoring. The following figure illustrates IMM's organisational setup, factoring in both its autonomous closed structure as well as its cooperative relations (Figure 1).

Figure 1. IMM's Institutional Architecture



While the MoI is self-obliged to cooperate with the IMM on the basis of the Cooperation Agreement, the AB IMM provides its input to the IMM through its own Terms of Reference, thereby strengthening the IMM's strategic orientation as well as internal and public accountability. The AB IMM – composed of external expert bodies in the area of fundamental rights, asylum and migration – therefore acts as an additional layer of expertise and accountability. In early 2025 and following IMM's Update ([Annex 2](#)), the AB IMM Recommendations served as a clear benchmark for further aligning IMM's operations with European best practices ([Annex 3](#)), whereas the IMM's subsequent response provided a structured roadmap for the practical implementation of these recommendations ([Annex 4](#)). The IMM CB as of 2025 thus regularly updates AB IMM about its work and operations, by submitting and discussing IMM's Periodic Work Reports which cover five-month periods of operations. Same reporting obligation has been introduced with regard to the MoI as

beneficiary of the IMM Project, which ensures that IMM-Mol cooperation challenges as experienced prior to 12/2024 are detected early on and successfully addressed, so that delays or halts of IMM missions may be prevented.

The IMM's operational ecosystem also incl. less formalised cooperation with competent Croatian state bodies that are obliged under national law to investigate allegations of fundamental rights violations and to ensure that complaints are processed expeditiously and appropriately.¹ This kind of cooperation practically concerns the Mol ICS and the Ombudswoman's Office², which in 2025 nominated contact officers serving as IMM's liaison points, enabling exchange of information, incl. discussions concerning IMM's referrals and follow-ups on potential irregularities. The Cooperation Agreement further foresees that the IMM shall engage with relevant key stakeholders and provide a channel for receiving information from the interested public, incl. via an electronic mailbox and an online contact form. In 01/2025, these notification channels were operationalised as part of IMM's broader institutional consolidation ([Chapter 3.6.1.](#)). As of 01/2025 the IMM has been receiving a steadily increasing number of notifications related to migrants' fundamental rights. In all instances, the receipt of such notifications was confirmed and the notifications themselves were communicated within 24 hours to the IMM CB, initiating urgent follow-ups and information requests to the GPD/Mol ([Chapter 3.4.](#)), as well as notification-triggered monitoring operations as necessary ([Chapter 3.3.3.3.](#)). While such notifications cannot replace field-based monitoring and must be treated as contextual inputs requiring verification, they constitute an additional 'early warning' data source that may trigger urgent field operations and/or adjustments in sampling priorities via the monitors' fundamental rights risk assessments.

In terms of human resources and expertise, the IMM's main substantive strength lies in its multidisciplinary composition, combining both scientific and practical expertise in all fields directly relevant for fundamental rights monitoring, such as medical (incl. forensic medicine and psychiatry), legal (incl. asylum, international, criminal and human rights law), intercultural and linguistic competence, security, criminology and operational know-how, as well as community, crisis and humanitarian work. In 2025, the IMM-consortium and Monitor Team were further strengthened through the inclusion of one more CSO with a strong track record in criminological and victimological research and field work, adding further expertise to the IMM CB and two additional medical experts (forensic medicine and psychiatry) to the Monitor Team—both female, incl. one monitor based in Osijek—thereby strengthening not only expertise, but also gender balance and geographical operational availability. This multidisciplinary set-up translates, in daily practice, into a genuinely transdisciplinary monitoring approach. Complex empirical observations in the field (incl. operational policing realities, humanitarian situations, and legal safeguards) are assessed through multiple disciplinary lenses, and findings are presented and discussed in settings where medical, legal, analytical, intercultural and field-operational expertise holistically interact. The IMM CB, as foreseen in the Cooperation Agreement, throughout 2025 and early 2026, regularly held its monthly meetings and as of 12/2024 has reinstated prior best practice dating back to 2021 and 2022 to have IMM monitors present their reports and substantive assessments for discussion with other monitors and the IMM CB. This is particularly relevant in a context where 'fundamental rights compliance' is not

¹ The State Attorney's Office, due to its own normative constraints, was not able to nominate a designated liaison for the IMM, but reassured that any potential referral of an IMM-detected irregularity would be investigated effectively.

² Until early 2025, the Ombudswoman's Office was member of the AB IMM. Due to the need to avoid conflicts of interest on the side of said Office, it excluded itself from IMM's formal setup. Cooperation nevertheless continued in 2025 bilaterally.

reducible to one indicator, but emerges from the interaction of normative standards, institutional procedures, infrastructure, human factors and real-life contingencies.

Finally, the organisational structure is designed to preserve independence not only institutionally, but also epistemically. By combining monitoring operation-level observation and assessments with systematic internal discussions among monitors and within the IMM CB, the IMM reduces the risk of overly individualised assessments and strengthens methodological consistency. In this sense, the IMM's internal structure is itself part of its methodology: governance, mission practice, evidence handling and reporting cycles form one integrated system. Hence, previous attempts to consolidate IMM's methodological framework without having properly consolidated its overall normative and institutional setup, in practice more often than not created operational challenges, uncertainties and inconsistencies, which eventually were also reflected in earlier IMM reports, while factoring in the lack of a 'blueprint' and that actual hands-on experience in this kind of monitoring is limited to a handful of expert bodies, one of them being the IMM itself.

1.3. Monitoring Missions and Operations

At the centre of IMM's overall operations lie the monitoring missions conducted in the field, in the form of on-the-spot checks of police officers' actions in the context of border surveillance, international protection and migration management. Individual missions and operations serve the primary goal of producing a documented and evidence-based assessment of whether fundamental rights were upheld by police officers in each monitored instance, whereas the overall set of monitoring operations' findings and reported assessments in a given year build the evidence base on which the IMM assesses the level of respect for fundamental rights in the system as such, by identifying both best practices and challenges, whether normative, institutional, systematic, operational, technical or human ([Chapter 3](#)).

Two clarifications are important for accurately understanding what a 'mission' is in IMM terminology and practice. First, a mission (or field day) is not a single observation point, but as a rule, it encompasses multiple monitoring operations at different monitoring locations within one mission itinerary. So, for example, within a single monitoring mission IMM monitors conduct on-the-spot checks at 3 monitoring locations (e.g. a border police station, a section of the green border and a (transit) reception centre). At each location they conduct one or more monitoring operations, whereby a monitoring operation is the continuous implementation of one or more target-specific 'monitoring activities' at, or in relation to, one single monitoring location. So, for example the 1st targeted monitoring operation focuses on interviewing a migrant at a (transit) reception centre, analysis of the relevant case file(s), analysis of MoI IS data, analysis of subsequent GPD activities and reports etc. The 2nd targeted monitoring operation focuses on the inspection of the facility and conditions, input from staff and migrants, analysis of case files (incl. medical files) and administrative registers/logs. Therefore, the definition of IMM monitoring activities reads lengthy, heavy and complex in order to cover all points of access, involved oversight modalities and information sources.

An IMM monitoring activity is an oversight activity of MoI police officers' actions in the area of border protection, irregular migration and international protection, conducted by IMM monitors at the external border, incl. the green and blue border and airports as mandated, at border crossing points / in police stations / police administrations of the Republic of Croatia with Bosnia and Herzegovina, Montenegro and the Republic of Serbia as well as in reception centres and reception centres for

foreigners. Oversight activities are conducted either directly (in vivo) through random and unannounced as well as announced on-the-spot checks (inspection of facilities and conditions, as well as shadowing of police officers' actions), or indirectly through case file analysis (either on-the-spot or remotely, based on electronic copies of case files), analysis of data contained in the Mol IS, interviews with migrants, interviews with police officers of the Mol and analysis of GPD activities and reports related to alleged unlawful actions towards irregular migrants and applicants for international protection.

Second, mission outputs as of 2025 are no longer limited to one single internal narrative report per monitoring mission. Instead, each mission produces a structured evidence package per monitoring operation consisting of (1) standardised reporting forms (per monitored location and per interview), each addressing multiple fundamental rights relevant items (variables), and (2) systematically collected and securely stored supporting documentation (e.g., photographs, case file copies, Mol IS printouts etc.). This evidence package is the practical unit through which traceability of monitors' findings and assessments is ensured, whereas it also is the overall evidentiary basis the IMM's key findings ([Chapter 3](#)) and the derived recommendations ([Chapter 4](#)) build upon.

From a practical point of view, a monitoring mission and its operations always combine direct (in vivo) oversight through almost exclusively unannounced on-the-spot checks ([Chapter 3.1.](#)) with indirect oversight through documentary verification and follow-ups as necessary. In practice, missions incl.: inspection of facilities and conditions; shadowing of police actions; review of case files; extraction and review of data contained in the Mol IS (on-the-spot or remotely, based on electronic printouts); interviews with migrants and applicants for international protection; interviews with police officers; and—where relevant—observation of technical border surveillance arrangements (e.g., observation of 'live feed'). The methodological logic of combining these monitoring activities within one monitoring operation and across each mission is triangulative: each access point and source has different strengths and limitations, and only their holistic and systematic analysis enables robust assessments and credible mission recommendations, the latter being issued both on-the-spot and following each cycle of conducted monitoring missions on a monthly basis ([Chapter 3.6.1.](#)).

Clearly, the ability of the IMM to derive its annual findings and issue its recommendations from a strong and reliable evidence base depends on both the frequency and the substantive quality of single monitoring missions and operations and the monitors' respective outputs (findings, assessments and recommendations). At the same time, it must be emphasised that IMM's monitoring mandate is not designed as a quantitative monitoring model or intended to produce statistically representative assessments reflective of Mol police officers' overall (semi)annual interactions with migrants in daily practice. The IMM has been normatively and hence operationally and methodologically pre-set to obtain empirically grounded 'snapshots' on a case-by-case or instance-by-instance basis, to ensure that plausibly established irregularities are referred and investigated efficiently, and to detect potential patterns and systemic challenges in police officers' conduct towards migrants through cumulative triangulation across monitoring missions and diverse information sources.

The year 2025 marked a structural shift and significant upgrade in monitors' field presence, evidenced by IMM monitors having conducted a total of 53 missions (field days). IMM monitors were present in the field on average on a weekly basis consistently throughout 2025, with the exception

of 01/2025 due to the IMM-relaunch and methodological consolidation phase. Said IMM field presence, along the entire Croatian external border, while discussed in full detail in [Chapter 3.1.](#), is referenced here to substantiate that IMM's institutional and methodological consolidation was not merely conceptual, but efficiently and expediently translated into sustained and consistent oversight intensity throughout 2025. Now, from a quality assurance perspective, increased mission and operation frequency does not automatically translate into substantially upgraded monitoring, since it might, in fact, simultaneously undermine quality if reporting becomes superficial due to increased intensity. To prevent this, the IMM CB in 2025 explicitly treated mission and operation frequency and their quality as a coupled category. Reporting instruments were substantially redesigned and considerably upgraded to become extractable and comparable databases ([Chapter 2](#)), supporting documentation was systematically collected and stored, and monitoring mission and operation reports were discussed in the monthly IMM CB meetings with monitors presenting their findings, after a built-in layer of prior two-level quality controls. This created multiple built-in verification and quality layers ('multiple eyes') on three consecutive hierarchical levels, thus enabling cross-detection of patterns, identification of inconsistencies and continuous refinement of methodological standards across missions, operations and monitor teams ([Chapter 2.5.](#)).

In practical terms, the systematic storage and internal discussion of each mission's and operation's evidence packages has an additional institutional function: it reduces reliance on 'personal memory' of those present in the field. In earlier phases of the IMM's work, this reliance was unavoidable due to the lack of centralised documentation collection, storage and sharing infrastructure. In 2025, however, such reliance on 'personal memory' became methodologically unnecessary. The result is that all monitors, IMM CB members and authorised associates who were not personally present during a mission and its operations can nevertheless develop a detailed understanding of observed facts and derived assessments, thereby enabling meaningful internal debate, pattern detection, consistent recommendation drafting and traceability of each issued recommendation back to the relevant monitoring reports and evidence packages. In this context, it must also be stressed that monitoring missions and operations, while primarily focused on targeted oversight, also generate as a valuable 'by-product' IMM institutional learning. By repeatedly observing similar procedures across different locations and facilities as well as in diverse settings, both monitors and the IMM CB develop an empirically grounded deep understanding of where applicable safeguards function well and where they are under systemic strain. This is precisely the kind of knowledge that allows the IMM to move beyond generic recommendations and to formulate evidence-based recommendations that are operationally workable, legally anchored and institutionally traceable ([Chapter 4](#)).

Finally, and to conclude the Report's chapter on IMM's institutional architecture, while at the same time serving as an analytical and normative bridge towards the following chapters presenting IMM's methodological architecture ([Chapter 2](#)) and discussing IMM's 2025 key findings ([Chapter 3](#)), it is necessary to clarify the normative and practical meaning of "detected irregularity" under IMM's mandate. For the purposes of this Report, and for the proper reading and meaningful interpretation of IMM's findings, it must be stressed once again that the IMM is a CSO-led external independent monitoring mechanism with special oversight and investigative powers and not a state body tasked with conclusively establishing any disciplinary, criminal or other liability of police officers' actions, least of all the MoI overall. Accordingly, where, after verification and triangulation of the available information or due to a lack thereof, an irregularity in police officers' actions could not reasonably be ruled out, the IMM classified the matter as a detected irregularity and referred each such

case/instance to the competent national authorities for proper investigation. This does not imply that the IMM conclusively established any wrongdoing. Rather, it reflects the nature and purpose of IMM's mandate. The IMM is neither an investigative nor a prosecutorial body, let alone a judicial one. Its purpose and mission are to ensure that credible indications of potential irregularities in the actions of police officers towards migrants are timely referred to, and properly investigated by, the competent national authorities, whereas empirically grounded best practices as well as remaining challenges should be publicly reported on together with relevant recommendations for improvements.

An IMM-detected irregularity, whether identified in an individual case/instance or as a qualitative pattern, indicates a matter requiring follow-up by the competent national authorities, not an allegation or determination of disciplinary, criminal or other responsibility of Mol's police officers or the Mol overall. IMM monitors consistently record all factual observations, triangulate location/facility- and interview-based information with additional documentation, and then distinguish between (a) indications that may amount to a detected irregularity within the meaning of IMM's mandate, and (b) shortcomings that do not reach that threshold, but nevertheless merit improvement-oriented recommendations and follow-ups. The findings and assessments presented in this Report must therefore be read correctly, particularly since the threshold for IMM-irregularities has been purposefully set extremely low as "cannot be reasonably ruled out", and the "shortcomings" also focus on conditions and settings which are not a consequence of police officers' actions as such.

2. METHODOLOGICAL ARCHITECTURE

While previously IMM's institutional architecture and the normative as well as operational consolidation achieved in 2025 was presented, this Chapter explains how IMM's monitoring mission and mandate have been transposed into a comprehensive methodological framework that is sufficiently robust to produce traceable, evidence-based findings, assessments and recommendations, both mission- and operation-specific and annually, while remaining realistic in light of limited resources, institutional capacities and pre-set timeframes. The methodological transposition of IMM's mandate reflects the qualitative oversight architecture, as pre-defined by the Cooperation Agreement, capable of generating credible evidence packages and findings (NALAZI), reasoned assessments (MIŠLJENJA) and actionable recommendations on a mission-by-mission basis (PREPORUKE), while maximising cost-benefit considerations and continuously balancing the frequency of missions and operations with the quality of documentation, verification and analysis against available resources. This methodological approach is deliberately 'disciplinary'. It is explicit about epistemic limits and its inference logic. Monitoring in the area of police border management and migration needs to be aligned to its specific setting: the phenomenon itself is dynamic, access is partial and mainly stems from secondary sources, empirical evidence is fragmented, and both legal and operational contexts are highly contested. Accordingly, the methodological ambition should be to produce traceable evidence packages that credibly support (1) case- and instance-based assessments, (2) referrals of detected irregularities to the competent national authorities, and (3) the identification of best practices and remaining challenges, as well as qualitative patterns of potential irregularities for the purpose of public reporting and issuing recommendations for future improvements.

Three premises are particularly important. First, the IMM monitors a complex operational domain characterised by high legal density and contested standards and terminology (e.g., "pushbacks" or collective expulsions and dissuasive actions and measures), high factual variability (different locations, shifts, policing tasks and humanitarian situations), and recurring public controversy. Second, the IMM's evidentiary access is necessarily partial: it is based on unannounced on-the-spot checks and on targeted access to documentation and data, rather than continuous full coverage. Third, credible oversight and monitoring requires methodological discipline: clear definitions, structured data collection, triangulation across sources, and a reporting architecture that enables internal verification and quality control, while ensuring external traceability. It is therefore important to keep in mind what IMM's methodology is not. It is not an adversarial or inquisitory investigation model; the IMM is not a law-enforcement or prosecutorial or judicial body and does not replace competent investigative authorities. It is also not a statistically representative survey of Mol's police officers' daily actions in the area of border management and migration. Rather, it is a preventive, deterrent and cooperative CSO-led external oversight model, designed to strengthen safeguards and accountability through independent monitoring, structured documentation, evidence-based assessment, and timely recommendations and referrals of detected irregularities, aimed at supporting both the protection of migrants' fundamental rights and the institutional integrity of police border management and international protection.

2.1. Transposing the Monitoring Mandate into a Methodological Framework

The Cooperation Agreement defines IMM's mission, the monitoring locations and facilities, access to information and documentation as well as the modalities of cooperation with the MoI. It does not, and cannot, provide the operational methods through which monitoring is to be carried out in a consistent and evidence-based manner. In methodological terms, the task is therefore to translate the IMM mission and mandate into: (1) a defined monitoring purpose and target; (2) a structured set of data sources and their use logic; (3) a sampling strategy compatible with the mandate and available resources; (4) operational mission procedures; (5) standardised data collection instruments; (6) a reporting, verification and quality assurance cycle that ensures internal reliability and external traceability; and (7) an effective recommendation and referral procedure. This translation task is also where IMM's methodological upgrades introduced in 12/2024 and early 2025 become particularly visible. Pre-2025 reporting cycles demonstrated that without an explicit methodological translation layer, monitoring risks becoming either overly narrative (descriptive but analytically weak) or overly abstract (principled but non-traceable). Both outcomes equally undermine IMM's core function: to produce credible, evidence-based assessments and recommendations that can be implemented and followed up meaningfully. The methodological framework therefore deliberately builds 'traceability' into every step: from mission planning, to evidence collection, assessment, recommendation and to referral design with consequent follow-ups and annual reporting and issuing of recommendations.

2.1.1. Purpose, Scope and Target of Monitoring

In conceptual terms, IMM's monitoring purpose is twofold. On the one hand, it is case-oriented: to document and assess (NALAZ + MIŠLJENJE) whether fundamental rights were respected in each monitored instance of police action. On the other hand, it is system-oriented: to identify, through cumulative analysis across cases/instances and locations/facilities, the normative, institutional, operational, technical and human factors that contribute to fundamental rights compliance or non-compliance, and to translate such insights into targeted, workable recommendations to the MoI on a monthly and annual basis (PREPORUKE).

The monitoring scope as such has been defined broadly and flexibly in the Cooperation Agreement itself to reflect the operational reality of border management. Monitoring is conducted at the external border (incl. the green and blue border), at border crossing points (incl. airports), and in (border) police stations along the borders with Bosnia and Herzegovina, Montenegro and Serbia, as well as in (transit) reception centres for foreigners. Oversight activities may be conducted directly (in vivo) through unannounced and announced on-the-spot checks (inspection of facilities and conditions, shadowing of police actions), and indirectly through case file analysis (on-the-spot or remote via electronic copies), analysis of MoI IS data, interviews with migrants, interviews with police officers, and analysis of police activities and reports of the GPD related to alleged unlawful actions/conduct. The monitoring target is not 'migration' as a social phenomenon, but specific state action through its agents: the conduct and decision-making of MoI police officers and related institutional practices in the areas of border surveillance, irregular migration and international protection. In this sense, fundamental rights monitoring operates at the interface between legal norms and operational policing reality. It requires the ability to translate normative standards, such as the prohibition of refoulement, effective access to asylum, the prohibition of torture and other forms of ill-treatment,

safeguards in the use of force, procedural guarantees in deprivation of liberty, to name but a few, into empirically observable indicators (variables) in concrete operational contexts.

IMM's monitoring target therefore is not the inspection and assessment of facilities and/or conditions of migrants' deprivation of liberty as such, which falls under the authoritative mandate and responsibility of the NPM and the CPT. The monitoring operations and activities of the IMM target police officers' actions and it is in this strict context in which observed facilities and/or conditions of deprivation of liberty factor into the monitors' assessments as a combination of threshold of severity and causality in relation to police officers' actions and/or practices of the MoI. Now, since the monitors do have unrestricted access to places of migrant's deprivation of liberty and as a rule inspect the relevant facilities and conditions, in line with the broader objective of the IMM to contribute to the respect of fundamental rights, pursuant to Art. 1 of the Cooperation Agreement, IMM's monitoring as an ancillary activity also incl. the assessment of facilities and/or conditions of migrants' deprivation of liberty, even in cases/instances where this is not directly related to police officers' actions, but with the sole purpose of detecting and documenting best practices as well as challenges and communicating its observations and recommendations to the MoI. The IMM's monitoring observations in this broader sense should not be conflated with the mandate, least of all the findings of the competent (inter)national bodies, such as the NPM and the CPT. The IMM's specific monitoring focus on the EU external border must also be situated in broader European context. Across the EU, irregular border crossings and border-management pressures fluctuate. Monitoring must therefore be able to function under changing operational intensity while preserving frequency and quality. In addition, EU-level developments (incl. the Pact and the increasing emphasis on screening and border procedures) reinforce the relevance of independent monitoring both as a preventive safeguard and as an oversight of investigations into potential police misconduct. Croatia's IMM, being established as early as 2021, therefore provides both continuity and institutional memory in a field where many independent monitoring mechanisms throughout the EU are only now being conceptualised.

Two terminological clarifications are methodologically important. First, the IMM uses 'assessment' (MIŠLJENJE) rather than 'opinion' as the conceptual category for its substantive analysis outcome about whether or not in each observed case/instance irregularities might have occurred. An opinion may be understood as a subjective view, whereas an assessment, in contrast, denotes a reasoned evaluation that is explicitly anchored in (1) the recorded facts (NALAZ), (2) the applicable standards, and (3) an explicit chain of reasoning explaining why the facts amount—or do not amount—to a deviation from those standards (MIŠLJENJE). This explicit chain of reasoning is the methodological safeguard against arbitrariness and the basis for traceability. Second, 'recommendations' (PREPORUKE) are not generic statements of principle. Because the Cooperation Agreement foresees that the MoI shall produce and implement an Action Plan for transposing IMM's recommendations into practice, these recommendations must be formulated in a manner that allows actual implementation as well as evaluative follow-up. A recommendation that is 'correct' in principle but neither evidence-based nor operational in practice is not only ineffective. It may also unintentionally undermine the Action Plan logic, because an institution cannot meaningfully implement or report on a recommendation that is not specific, traceable and measurable. This observation is not abstract: earlier IMM recommendations contained in previously issued (semi)annual IMM reports were occasionally necessarily generic due to the limitations of the then existing reporting infrastructure, and the 2025 MoI Action Plan—expectedly—remained largely even less traceable and more unspecific.

IMM’s methodological approach is thus fully aligned with FRA’s Guidance on independent fundamental rights monitoring mechanisms and the relevant CPT standards, which emphasise that monitoring should be systematic and regular, cover a range of border management activities, and serve a preventive function by reducing the risk of violations, strengthening safeguards, and supporting domestic investigations through objective, evidence-based analysis and referrals of detected irregularities. At the same time, IMM’s mandate and resources set a clear boundary condition: monitoring cannot be continuous, exhaustive or statistically representative, but as a normative baseline establishes a minimum of 20 monitoring missions annually, whereas anything more than that is limited through budgetary constraints and institutional capacities. Finally, the purpose of monitoring is not only to detect shortcomings, but also to identify and consolidate best practices. A mature monitoring mechanism must be able to demonstrate where procedures and safeguards function well, as this is essential for constructive institutional learning and for maintaining the cooperative nature of the IMM’s oversight model. In this regard, mission- and operation-level assessments and monthly as well as annual recommendations are designed to be balanced: they document both compliance and non-compliance to applicable standards, thereby enabling the Mol to strengthen existing good practices and remedy identified shortcomings.

2.1.2. Evidentiary Architecture and Data Sources

The IMM’s methodological framework is built around an explicit evidentiary architecture: monitoring findings are not derived from a single source, but from the structured triangulation of multiple data sources with different epistemic strengths and limitations. This is particularly important in a context where allegations of unlawful police officers’ conduct may arise in highly dynamic situations (e.g., at the green border), where retrospective verification may be difficult, and where institutional trust and cooperation depends on the credibility and traceability of evidence. Accordingly, each monitoring mission and operation aims to feasibly combine direct observation, documentary verification and contextual triggers, producing a structured evidence package that can be internally verified and externally defended. Methodologically, the IMM distinguishes between (1) direct monitoring sources (in vivo observation), (2) documentary and system sources, (3) human sources, and (4) contextual/open sources, whereby each source category answers a different evidentiary question (Table 1). Because each category also entails specific limitations (e.g., observation is time-bound, documentation may be incomplete, interviews may be influenced by fear, translation constraints or factual inaccuracy, and open sources may be biased) triangulation is the central methodological safeguard.

Table 1. Evidentiary Architecture: Triangulation Across Data Source Categories

<p>DIRECT (in vivo) MONITORING SOURCES On-the-spot checks; shadowing of police actions; observation of operational practices; inspection of facilities and conditions.</p>
<p>DOCUMENTARY AND SYSTEM SOURCES Case file analysis (on-the-spot or remote); Mol IS data (printouts); Mol registers/statistics; Mol risk assessment parameters; internal police documentation; GPD actions/reports on alleged violations.</p>
<p>HUMAN SOURCES Interviews with migrants (with informed consent, without police presence); interviews with police officers (operational/technical context); input from staff at (transit) reception centres.</p>
<p>CONTEXTUAL / OPEN SOURCES Publicly available information (incl. media and research sources); stakeholder inputs; IMM notification channels (contact form/mailbox); CSO reporting on alleged violations.</p>

Table 2 below lists the key data sources and briefly describes their use in IMM practice. The practical feasibility of each source varies across locations/facilities, mission types and operational targets, and its value must be assessed continuously in light of (1) access limitations, (2) evidentiary reliability, (3) time and resource costs, and (4) ethical and data protection requirements. This is where the IMM's cost-benefit assessment becomes operational, as the goal is not to collect everything, but to collect what is necessary and sufficient to produce robust substantive assessments, while preserving the capacity to maintain stable mission and operation frequency.

Table 2. Classification of IMM's Data Sources with Description and Methodological Use

Data Source	Description and Methodological Use
Primary/Direct <i>in Vivo</i> Data Sources	
Unannounced on-the-spot checks	Random and unannounced visits to police stations, border crossing points, police administrations, reception centres, reception centres for foreigners; inspection of facilities and conditions; observation of daily practice in real time.
Announced on-the-spot checks	Planned visits (incl. when access to specific documentation or staff availability is required); used to ensure coverage of locations and functions that cannot be assessed through unannounced checks.
Shadowing of police actions	Observation ('shadowing') of police officers' actions during relevant procedures (e.g., registration, processing, transfer), where feasible and permitted; used to assess procedural safeguards and proportionality in practice.
Green / blue / air border observation	Observation of green / blue /air border areas and operational infrastructure; used to understand operational context, risk environment, and—where feasible—to observe apprehension- and processing-related police practice.
Observation of technical border surveillance	Where feasible, observation of relevant technical arrangements (e.g., 'live feed' monitoring); methodologically useful for contextualising how surveillance translates into operational interventions; limitations apply where footage is not archived.
Documentary and System Sources	
Case files (on-the-spot / remote)	Case file analysis based on physical files during missions or on electronic copies; used to verify procedural steps, safeguards, reasoning, and documentation practices (e.g., use of force reports, asylum-related documentation).
Mol IS (printouts)	Analysis of data contained in the Mol IS (on-the-spot or remotely via electronic printouts); used for verification, triangulation and reconstruction of timelines.
Police logs, internal registers	Operational logs, duty rosters, registers and internal records; used to corroborate presence, timing, chain of events, and institutional responses.
Mol monthly statistical reports	Monthly statistical reports provided by the Mol (by the 10th of each month); used both for risk-based sampling (FRRA) and for contextualising annual findings.
Mol risk assessment parameters	Risk assessment parameters provided by the Mol for the forthcoming months. Used for targeted sampling (FRRA) and for ensuring that monitoring is responsive to operational realities, esp. by targeting high-risk areas and settings.
Human Sources Directly Interviewed or Providing Information	
Interviews with migrants	Semi-structured interviews conducted with informed consent and in a confidential environment without police presence; used to collect migrants' self-reported lived experience, identify vulnerabilities, and triangulate allegations with other sources.
Interviews with police officers	Interviews conducted during missions to understand operational practice, constraints, and institutional procedures; used for contextualisation and triangulation (not as sole evidentiary basis).
(T)RC staff, other on-site actors	Where relevant, exchanges with staff in (transit) reception centres or other facilities (within mandate) to contextualise conditions and procedures.
IMM notification channels	Information received via IMM mailbox/contact form may trigger urgent operations and targeted inquiries; treated as contextual input requiring verification.
Key stakeholders	Structured exchanges with relevant stakeholders and other actors (incl. CSOs comprising the IMM) may provide contextual information or early warnings; used as monitoring triggers and triangulated with other sources.

Open-Source, Research and Normative Sources	
Normative sources	Constitutional and legal provisions, EU law, ECtHR, CPT, SPT standards; provide the evaluation framework for monitors' assessments (MIŠLJENJA).
Media sources	Public information indicating potential irregularities or incidents; used as triggers for sampling, targeted operations and as contextual input requiring verification.
Research and analytical reports	Academic, scientific and analytical outputs relevant to migration, border management and fundamental rights; used for contextualisation and methodological calibration, as well as FRRA and risk-based sampling.
International organisations' reporting	Reports and guidance from bodies such as CPT, SPT, Frontex' FRO, UNHCR, IOM, FRA and others; used for standards, best practice benchmarks and contextual reference, incl. FRRA and monitors' assessments (MIŠLJENJA).
Internal IMM Sources and Analytical Outputs	
Monitors' operation reports	Structured reporting instruments completed by monitors during/after monitoring operations; provide standardised recording of observations, assessment logic and recommendations, while allowing additional qualitative notes.
Stored supporting documentation	Photographs, scanned files, electronic case file copies, MoI IS printouts and other operation-related documents uploaded systematically in addition to the reporting forms, enabling comprehensive reconstruction of relevant facts.
Central datasets derived from monitors' reports	Automated extraction of monitoring information into datasets (location-, interview- and interviewee-level data) enabling aggregate analysis, trend/pattern detection and structured reporting, while preserving qualitative depth.
Periodic reports and internal adoption records	Periodic work reports submitted to the AB IMM and MoI and internal IMM records of report discussions, adoptions, referrals and follow-ups (monthly), enabling traceability of recommendations and institutional learning.
Monitors' annual reports	Qualitative annual reports produced by monitors highlighting best practices, challenges, patterns, illustrated on examples, enabling ethnographic approach.
Complaints Procedure and Follow-Up Mechanisms	
"Letter of Rights and Complaints" pilot-procedure	Standardised instrument piloted in selected police administrations to provide rights information and capture complaints at the earliest stage, enabling timely investigation, 'live' IMM oversight and preventative compliance effects.
MoI's / competent bodies' follow-up reports	Reports from the GPD, MoI ICS and other competent bodies regarding alleged unlawful actions (incl. investigations), used for triangulation, closure and institutional learning, incl. assessment of effectiveness of investigations.

Two additional points merit explicit explanation. First, monitors' experience confirms that the feasibility of a source is not only a question of access, but also of evidentiary integrity. A data source that is accessible may still be methodologically weak if it cannot be preserved, verified or contextualised reliably (e.g., live surveillance feeds that are not archived, interview findings where consent has been revoked etc.). Second, the value of a source depends on how it is combined with others. For instance, migrant interviews are methodologically indispensable for collecting and understanding self-reported lived experience, but their evidentiary reliability increases significantly when combined with documentary verification (e.g., case files, MoI IS data, medical records etc.) and with direct observation of procedural practice or corresponding qualitative patterns across missions and monitoring teams. Thus, data sources that commonly have a very low feasibility (e.g., green border monitorings), may exceptionally prove crucial in detecting and/or confirming patterns (e.g., conversations with staff or police officers). This reinforces the need for a systematic feasibility analysis and for a deliberate cost-benefit approach. Time invested into a data source with low evidentiary yield is time not invested into monitoring activities or deeper verification elsewhere. The IMM therefore treats feasibility analysis as a continuous internal task, discussed in IMM CB meetings with monitors, as reflected in constant adjustments of mission design and instruments, while maintaining overall methodological consistency for the purpose of comparability across time.

2.2. Sampling Methodology: Fundamental Rights Risk Assessment

IMM's sampling methodology is based on a fundamental rights risk assessment (FRRA) approach. Given the mandate's breadth (longest external land border of the EU, various facility types and operational tasks) and the necessarily limited resources of any independent monitoring mechanism, sampling must be purposeful in order to maximise the likelihood of detecting potential fundamental rights risks while preserving sufficient mission frequency and location diversity to enable practice and pattern detection as well as institutional learning. In other words, sampling is conceived as a cost-benefit optimisation challenge under strict ethical and operational constraints. The FRRA is informed by multiple inputs, incl.: (1) detailed monthly statistical reports provided by the MoI; (2) MoI risk assessment parameters for the forthcoming month; (3) geographic stratification considerations ensuring that monitoring does not concentrate only on a narrow set of locations; (4) publicly available information and stakeholder inputs, incl. IMM members' respective CSOs, indicating potential incidents or patterns thereof; (5) information received via the IMM mailbox/contact form; and (6) the monitors' own field-based knowledge and cumulative experience.

In operational terms, these inputs are translated into selection criteria such as:

- locations/facilities with higher operational pressure indicators (e.g., increased apprehensions, high human smuggling and related organised crime incidence, operational redeployments, seasonal patterns);
- segments where public allegations or stakeholder information indicate potential irregularities and/or fundamental rights violations;
- under-monitored locations to avoid 'blind spots' and ensure geographic balance;
- location/facility types and procedures with known safeguard sensitivity (e.g., registration practices, access to interpretation, deprivation of liberty safeguards, procedures affecting vulnerable persons);
- event- and notification-triggered missions where urgent/timely monitoring is required to preserve evidentiary traceability.

Risk-based sampling also necessitates interpretative caution. Because monitoring is based on sampling designed to target higher-risk contexts, the mission- and operation-sample is not representative of MoI police officers' overall daily interactions with migrants. This is not a methodological flaw, but an intrinsic feature of purposive oversight and sampling design. The aim is to detect, document and follow up on potential risks and irregularities in a manner that is credible and institutionally actionable, not to estimate prevalence. As shall be discussed later on, the "Letter of Rights and Complaints" procedure, if implemented nationwide and systematically, would enable such prevalence assessments and representative findings, notwithstanding the representativeness of the pilot-findings within the limitations of the pilot itself ([Chapter 3.3.5.](#)).

At the same time, risk-based sampling must not become purely external narrative-driven in a narrow sense. Monitoring that only follows media or CSO allegations would risk reactive bias and reduce the IMM to a passive response unit. Accordingly, the sampling methodology deliberately combines structured, forward-looking inputs (MoI statistics and risk parameters) with independent triggers (open-source and stakeholder inputs) and with systematic coverage logic (geographic stratification and location/facility type rotation). This combination is methodologically important for independence: it reduces the risk that monitoring priorities are externally dictated, while maintaining responsiveness to credible information.

In practice, the IMM's sampling logic is further dictated by operational realities. Certain locations are reachable only with significant travel time; certain monitoring types (e.g., interviews) depend on the presence of relevant persons at the day and time of the mission; and certain documentary sources require pre-arranged access or time-consuming retrieval. Methodologically, this means that sampling decisions are never made on abstract risk criteria alone, but also on feasibility and on the ability to generate a sufficiently rich evidence package within a monitoring operation, a mission (day) and within one mission cycle. Thus, all IMM monitors are experts in their respective fields and full-time employed, which also needs to be factored into mission planning and execution, becoming more complex as the number of monitors in the mission team increases.

Finally, the sampling model is embedded in an explicit learning loop. Each mission produces not only mission- and operation-level findings, but also sampling feedback, i.e., information about whether the selected location/facility, mission and operation type generated meaningful evidentiary value relative to invested resources. This feedback is systematically discussed in IMM CB meetings together with the monitors and daily via the logistical support provided by the IMM Office to monitoring missions, and informs subsequent risk assessment and sampling decisions. In practice, this is how the IMM throughout 2025 and early 2026 continuously calibrates the balance between mission frequency and mission depth, while factoring in an incredibly broad scope of FRRA data and sources against the backdrop of its adequate yet limited resources.

2.3. Operational Methodology and Procedures

The operational methodology specifies how monitoring missions are planned, executed and documented in practice. It links the sampling logic ([Chapter 2.2.](#)) with the evidentiary architecture ([Chapter 2.1.2.](#)) and the data collection instruments ([Chapter 2.4.](#)), ensuring that monitoring is not simply a set of ad hoc on-the-spot checks, but a coherent sequence of procedural steps that can be replicated, compared and audited over time. Operational methodology is therefore the 'bridge' between IMM's monitoring mandate and strategy and its findings and recommendations. In simplified form, each monitoring mission follows a mission cycle consisting of five consecutive phases: (1) pre-mission planning and dispatch; (2) entry and orientation on site; (3) on-site monitoring operations through targeted monitoring activities; (4) exit debrief with an immediate follow-up where indicated; and (5) post-mission reporting and documentation storage, incl. layered 3-level verification and quality check, transdisciplinary discussions and institutional follow-ups through monthly recommendations and, if required, referrals of detected irregularities to the competent national authorities.

PHASE 1 – Pre-Mission Planning and Dispatch: On the basis of the mission monitor team's sampling decision, followed by the IMM CB's confirmation or sampling adjustment, the mission is planned in operational terms. Final team composition is determined (usually at least two monitors, and where relevant IMM CB members and/or IMM associates), logistical requirements are assessed (travel, access arrangements, safety considerations), and the mission scope is specified (locations, anticipated monitoring operations, documentation to be requested). Where announced monitoring is exceptionally required (e.g., for access to particular sites such as airports or to ensure the availability of specific interlocutors), the Mol contact officer is informed in accordance with the Cooperation Agreement; where unannounced monitoring is pursued, which is the rule, contact is established on arrival in line with agreed protocols. A core operational principle is that missions are planned as sequences rather than isolated on-the-spot checks. Whenever feasible, the mission itinerary aims to cover at least three types of locations/facilities (e.g., a reception facility, a border

crossing point, sections of the green border), as this increases comparative value and allows triangulation across procedural contexts, while maximising use of resources due to the limited number of annually mandated missions. This combination of several types of locations/facilities and operations within one mission is particularly relevant for understanding how practices differ between green-border-related tasks and registration or reception tasks, and how safeguards translate across different organisational units, geographies and practical settings.

PHASE 2 – Entry and Orientation on Site: Upon arrival, monitors identify themselves and present their IMM accreditation in line with internal procedures and the Cooperation Agreement. An initial orientation step is used to establish the basic situational picture: current operational workload, staff availability, relevant facilities to be inspected, and the availability of documentation for review. This phase is also used to identify any access restrictions or practical obstacles. Such restrictions are recorded as part of mission documentation ([Chapter 3.2.](#)), as they are methodologically relevant (they affect feasibility and may indicate systemic bottlenecks), and instantly reported towards the IMM CB and through Mol hierarchy.

PHASE 3 – On-Site Monitoring Operations: This phase comprises the substantive monitoring work and is typically structured around a combination of: (a) inspection of facilities and conditions (incl. reception areas, interview rooms, medical spaces where relevant, and general conditions affecting dignity and privacy); (b) observation and, where feasible, shadowing of procedures (e.g., registration steps, provision of information, access to interpretation, engaging with vulnerable persons); (c) documentary verification (case files, Mol IS printouts, internal logs); and (d) interviews with migrants and, where relevant, with police officers and conversations with other staff encountered. The operational sequencing is flexible but disciplined: monitors adapt to situational constraints while ensuring that the operation remains anchored in the planned evidentiary logic and that safeguards (confidentiality, consent, do-no-harm principle) are systematically applied. Interviews with migrants are conducted based on informed consent and, as a rule, in a confidential setting without the presence of police officers. Methodologically, this safeguard is essential, as the presence of police officers might not only inhibit truthful reporting due to fear of negative consequences, but would also undermine the credibility of the evidence gathered. Where confidentiality cannot be ensured due to spatial or operational constraints, this is recorded, and the evidentiary weight of the interview is assessed accordingly in the operation's report. Where green border observations are part of a mission, which in 2025 was the rule, it is integrated either as a distinct operation (e.g., inspection of green border and operational context) or, where feasible, as observation of relevant operational practices adjunct to the respective facility monitoring operation. Given safety constraints and the factual variability of green border contexts, monitors are accompanied by police officers, whereas the methodological emphasis is placed on documenting what is directly observable, and on triangulating any allegations or indications thereof with documentary sources and follow-up inquiries, rather than on speculative reconstruction.

PHASE 4 – Exit Debrief and Immediate Follow-Up: At the end of a monitoring operation and mission, i.e., at each location/facility, monitors conduct an exit debrief with relevant police officers and local interlocutors as appropriate. This debrief serves two functions: it allows the verification of basic factual questions (e.g., whether additional documentation can be provided), and it enables the communication of any immediate on-the-spot recommendations where a shortcoming and/or irregularity is clearly identifiable and can be remedied without delay. Where the mission reveals possible irregularities requiring urgent follow-up, the IMM CB is informed without delay to enable urgent/timely institutional action (e.g., inquiries, referrals, requests for preservation of documentation).

PHASE 5 – Post-Mission Reporting and Documentation Storage: Following the mission, monitors complete the standardised reporting instruments and upload all supporting documentation into the secure central storage system. This systematic upload practice ensures that the IMM CB and other monitors—who were not present on site—can reconstruct the findings’ factual basis in detail, enabling meaningful internal discussion of assessments, cross-checking and pattern detection. Monitoring operation reports are after submission checked by a designated IMM associate, re-checked by a designated IMM CB member and then presented and discussed in the monthly IMM CB meetings, before the IMM CB adopts each monitors’ monitoring operation report, creating a multi-layer verifications and quality controls sequence with high internal transparency ([Chapter 2.5.](#)).

Operationally, the just briefly presented mission cycle is supported by the 2025 adopted internal Working Procedures and the Manual for Monitors, which specify issues such as team roles, communication protocols, evidence handling, safety considerations, and the handling of sensitive data. These internal rules serve an important methodological function by reducing discretionary variance in monitoring practice and ensuring that key safeguards are systematically monitored, while enabling comparability across missions, operations, locations/facilities and monitors over time. Several cross-cutting operational considerations, however, deserve explicit mention. First, interpreter availability and confidentiality conditions are not peripheral logistics, but core methodological safeguards: interviews require translation modalities that preserve confidentiality as far as possible and reduce the risk of secondary trauma. Second, safety and access constraints at the green border require clear internal protocols; the methodology therefore emphasises documented observation and triangulation rather than risky activities which might endanger monitors, police officers or migrants. Third, evidence preservation is time-sensitive: where a mission produces indications of potential irregularities, institutional follow-up must be initiated quickly to preserve documentation that might otherwise be lost. Finally, operational methodology is not only about how to observe, but also about how to preserve institutional independence while engaging in cooperative oversight. The IMM’s monitoring model is designed as cooperative and preventive rather than adversarial or inquisitorial: it relies on access and communication with the Mol, while maintaining the monitors’ autonomy of assessment and the IMM CB’s autonomy of follow-up and referrals. This duality, cooperation without co-optation, is maintained through procedural safeguards such as clear access rules, documentation of restrictions, contractual independence clauses, and transparent reporting, verification and quality-control cycles.

2.4. Data Collection Methodology, Instruments and Recording Standards

The data collection methodology translates the evidentiary architecture and operational findings into concrete instruments and recording standards. In the IMM context, this is decisive, because without standardised data collection, even frequent missions and operations cannot produce comparable evidence packages, and cumulative pattern detection becomes methodologically fragile. The 2025 reporting cycle therefore introduced a structural shift from a largely narrative mission report template towards a set of standardised, extractable and analytically usable instruments, without sacrificing the qualitative depth necessary for meaningful substantial fundamental rights assessment.

BASELINE: Pre-2025 Reporting Template. At the time the IMM was initially established, data collection was operationalised through a single broad mission report form based on open-text entries and broad categories/topics. While this template enabled basic recording, it had three structural limitations: (a) it left substantial discretion to individual monitors in deciding what to record and what not to record; (b) it was not designed for systematic extraction, aggregation and cross-mission or cross-instance comparison; and (c) it made internal verification difficult because key indicators were not consistently recorded in a standardised way across missions, locations/facilities, interviews and monitors. These limitations are visible in pre-2025 IMM reporting cycles and partly explain why earlier IMM (semi)annual reports necessarily remained more descriptive and less traceable in their recommendation logic.

UPGRADE: Standardised Instruments Introduced in 2025. Beginning in early 2025, the IMM introduced two core reporting instruments: (1) a location- and facility-based monitoring report and (2) a migrant interview report. Both instruments are structured through a combination of predefined fields (incl. multiple-choice entries for key indicators) and open-text fields for qualitative description, contextualisation and additional information. This design serves two methodological purposes simultaneously. First, it guides monitors through a coherently applied methodology (reducing variance in what is recorded). Second, it ensures that monitors are not limited in any way, but can record all additional information they deem relevant (qualitative depth is preserved).

Said instruments, designed in early 2025, were first extensively piloted throughout the 1st half of 2025. Then they were further calibrated with explicit attention to the operational realities of monitoring. They are ‘user friendly’ for monitors: instead of requiring monitors to translate complex operational observations into broad narrative categories, the forms now provide a structured pathway through key safeguards and observation points (e.g., access to interpretation; confidentiality of interview environment; procedural steps in registration; handling of vulnerable persons; police use of force etc.), while allowing free-text expansion where nuance or case/instance specific details are required. This reduces cognitive load in the field and improves consistency, which is especially important in high-pressure operational environments where observation time is limited and documentation quality is the primary asset of the IMM. Another key methodological benefit of standardisation is that it enables systematic internal verification. When monitors use the same structured indicators, the IMM CB and authorised associates can cross-check consistency across missions and identify both substantive patterns and methodological issues. This feedback is then used to refine the instruments and to harmonise monitors’ field practice. In this sense, the reporting instruments function not only as simple data collection tools, but also as internal ‘method regulators’. Due to standardisation of the instruments, which simultaneously serve as monitors’

monitoring operation reports, all IMM members and relevant associates, easily and quickly identify key sections and indicators of interest and can immediately access all collected documentation.

A crucial additional upgrade lies in data extractability. Because key fields are standardised, data recorded through the instruments can be extracted into central datasets, enabling aggregate analysis, trend detection and structured reporting over time. In practice, this has produced three core datasets: a location-level dataset (covering monitored locations/facilities), an interview-level dataset (covering migrant interviews) and an interviewee-level dataset (covering interviewed migrants). This allows the IMM to complement narrative mission reporting with empirically grounded aggregate evidence (e.g., distributions of monitoring types, locations, interview frequencies, recurring safeguard issues etc.), while preserving the mission- and operation-level narrative necessary for fundamental rights assessment and recommendation drafting. Most importantly, as of 2025 the assessment section mandates a final monitor decision in each instance observed about irregularities or violations, incl. a comprehensive classification that adopts Frontex' methodology.³

Data integrity and traceability are as of 2025 further strengthened through the systematic practice of collecting and storing all supporting documentation (e.g., photographs, scanned files, Mol IS printouts and other monitoring operation materials) in addition to the monitors' reports. This ensures that the 'report' is not reduced to variables and concentrated textual narratives, but remains embedded in an evidence package that can be accessed by IMM CB members, fellow monitors and authorised associates. Supporting documentation uploaded and stored alongside monitoring operation reports typically incl. (non-exhaustive):

- photographs of facilities/locations, relevant spaces, vehicles, and (where appropriate) operational contexts;
- electronic copies/scans of case files and all entailed content;
- Mol IS printouts or extracts;
- scans or copies of internal logs, registers or other documentary materials made available during and following monitoring operations;
- where relevant, medical documentation or other materials necessary for assessment.

Ethical safeguards are also as of 2025 firmly integrated at instrument level. Interviews are conducted only with informed consent and commonly after prior notice to prospective interviewees. Confidentiality and non-retaliation considerations are built into the interview procedure itself and the reporting instruments are designed to minimise unnecessary collection of personal data while ensuring that information needed for assessment, referral and potential follow-up is captured. This operationalisation of ethics in fundamental rights monitoring is a precondition for credibility and for the protection of the persons whose rights are at stake.

Regarding migrant interviews, as a distinct type of monitoring operation targeted at capturing lived experience of potentially harmful encounters with police officers, IMM's methodology deliberately has not opted for incident or case-based estimations of the probable overall number of migrants to whom the interviewee's own lived experience refers to or on which the interviewees might report. Many CSO reports as well as the Greek Reporting Mechanism in the area of monitoring fundamental rights of migrants have adopted such an incident/case-based estimation methodology. The IMM, however, due to its specific mandate which as a key feature incl. the obligation to refer all detected

³ [Frontex' List of Potential Fundamental Rights Violations During Operations](#)

irregularities to the competent national authorities for investigation and therefore necessitates a strict evidence-traceability, has not adopted such an estimation-approach, although in terms of fundamental rights assessments, monthly recommendations, annual findings and public reporting this aspect is clearly factored into IMM's overall assessments.

Finally, by the end of 2025, the cumulative effect of the briefly described and explained methodological features was that monitoring ceased to be dependent on a single narrative report and became anchored in a structured evidence architecture: standardised indicators + qualitative narrative + stored evidence-package + central datasets + internal verification and quality controls. This architecture is what enables the IMM to produce annual findings that are more than descriptive summaries. It enables the IMM to identify best practices, remaining challenges, single detected irregularities and a qualitative pattern of possible irregularities, to design more targeted recommendations, and to link recommendations to follow-up and implementation pathways.

2.5. Reporting Methodology: Multilayer Verification and Quality Control

The reporting methodology specifies how mission- and operation-level information and evidence packages are transformed into institutional outputs: adopted monitoring operation reports, monthly recommendations to the MoI, periodic reports to the AB IMM and the MoI, referrals of detected irregularities and, ultimately, public annual findings and recommendations. In fundamental rights monitoring reporting is part of the evidentiary chain. Accordingly, the IMM's reporting architecture is designed as a multilayer verification and quality control system, ensuring that facts, assessments, recommendations and referrals remain traceable from the field to the institutional level.

In IMM's reporting terminology, three outputs are analytically distinct. First, the monitoring operation-level report documents the facts stemming from observations, evidence and contextual information (NALAZ). Second, the report's assessment section (MIŠLJENJE) is the reasoned expert-monitors' evaluation of whether the recorded facts indicate compliance or non-compliance with applicable standards. Third, the report's recommendations section (PREPORUKE) contains action-oriented propositions derived from the assessment, designed to be implementable and followable. Keeping these categories distinct is methodologically crucial, as it reduces the risk of conflating facts with assessments, and delivering assessments without or in contradiction with facts, while ensuring recommendations are indeed evidence-based and not mere policy preferences.

In 2025, the IMM introduced and consolidated a reporting pipeline consisting of four main layers with built-in quality checks:

- Drafting (IMM monitors): monitoring operation reports are drafted, using the standardised instruments and the relevant supporting documentation/evidence package is attached.
- Fact-checking/verification (designated IMM associate): completeness checks, internal consistency checks, anonymisation and evidence package integrity checks of submitted monitoring operation reports are performed.
- Quality control (designated IMM CB member): methodological consistency, coherence of the chain of reasoning (NALAZ → MIŠLJENJE → PREPORUKE), and alignment with IMM terminology and applicable fundamental rights standards are reviewed.
- Discussion and adoption (reporting monitor + IMM CB + Monitor Team + designated IMM associate): monitoring operation reports are presented by monitors and discussed in monthly IMM CB meetings; reports and follow-up steps are adopted (or returned for revision) in a structured, transparent and transdisciplinary internal setting.

This multilayer architecture is the practical mechanism through which the IMM maintains both credibility and operational scalability. It prevents any single-monitor fallacy by ensuring that assessments are discussed and reviewed. It reduces the risk of inconsistent terminology and standards across monitors and it enables the IMM CB to adopt recommendations that are anchored in evidence rather than in isolated impressions. Crucially, the reporting architecture is designed to preserve, not dilute, monitors' substantive assessment autonomy. Monitors retain the primary role in factual documentation and mission-/operation-level assessment, whereby quality control is not a rewriting, but an internal mechanism ensuring that what is claimed is supported by evidence, that definitions and standards are applied consistently, and that recommendations are formulated in a traceable and actionable manner. In practice, this often means strengthening the explicitness of the chain of reasoning: ensuring that each assessment, incl. determined irregularity/violation, and each recommendation can be traced to a documented fact (indication) and to an articulated standard.

The reintroduction of monitors' participation in IMM CB meetings for the presentation of mission and operation reports is particularly important in this context. Rather than limiting internal discussion to IMM CB members alone, the IMM CB as of 12/2024 reinstated the good practice (used in 2021 and partially 2022) of involving all monitors in the monthly IMM CB meeting cycle. This provides an institutional environment where those who observed facts and made substantive assessments can directly contextualise them, respond to questions and engage in structured transdisciplinary reflection. Methodologically, this is a key quality feature: it increases internal reliability and supports continuous learning across monitors and locations. Numerous IMM CB-monitor discussions in said setting throughout 2025 have thus raised valuable issues which otherwise might not have been spotted, nor successfully resolved.

Once mission reports are adopted internally, follow-up outputs are systematised in a structured cycle. In 2025, the IMM introduced the practice of issuing monthly recommendations to the Mol based on completed missions, thereby reducing time lags between observation and institutional feedback ([Chapter 3.6.1.](#)). This is methodologically relevant for two reasons: (1) it increases the likelihood that recommendations are operationally meaningful for the Mol because they are timely, and (2) it enables the construction of a traceable recommendation chain that can be linked to Mol's Action Plan logic and followed up over time. It also as of early 2025 compensates for those IMM recommendations to the Mol that might have been overly generic, outside of the strict competence of the Mol, or outdated given the prolonged time-lapse between conducted monitoring missions and the publication of the 2nd IMM Semi-Annual Report in 2024. In parallel, where missions and/or operations reveal detected irregularities or violations, the IMM CB's institutional obligation is not limited to merely noting such issues in a report. Detected irregularities are referred to the competent state authorities for investigation, in line with national mandates and the Cooperation Agreement's oversight design ([Chapter 3.4.](#)). This ensures that monitoring findings are connected to institutional accountability mechanisms (internal control, prosecutorial review, ombudswoman oversight), without transforming the IMM CB into a para-legal investigative authority itself.

Finally, the reporting methodology explicitly incorporates an internal learning loop. Each reporting cycle provides feedback not only on substantive findings, but also on methodological performance: which data sources were feasible; which instruments required clarification; where reporting categories produced ambiguity; and how operational constraints affected evidence quality. This is regularly discussed in IMM CB meetings as well as internal methodological training sessions for monitors and informs subsequent adjustments to instruments, mission procedures and sampling

logic. The result is a methodology that remains both disciplined and adaptive, capable of responding to changing operational realities without losing coherence. Overall, the methodological components outlined in this Chapter, ranging from mandate transposition, data sources, risk-based sampling, operational mission cycles and standardised data collection, all the way to incorporated ethical safeguards and reporting with built-in multiple layers of verification and quality control, form the backbone of IMM's monitoring and annual reporting credibility. [Chapters 3](#) and [4](#) accordingly build on this backbone by presenting the 2025 key findings and based on them IMM's 2025 annual recommendations to the Mol.

3. KEY FINDINGS

The following sections present and discuss IMM's key findings on the basis of all monitoring missions and operations conducted throughout 2025.⁴ As the central analytical chapter of the Report, [Chapter 3](#) translates the institutional and methodological architecture set out in [Chapters 1](#) and [2](#) into concrete findings, assessments and, where required, referrals and follow-ups. It therefore begins by setting out key indicators of monitors' 2025 field presence ([Chapter 3.1.](#)) and their access to relevant data sources, files and facilities ([Chapter 3.2.](#)). The purpose of these opening sections is to transparently disclose the empirical and evidentiary basis from which the IMM's substantive findings are derived. They are intended to situate the findings both methodologically and substantively, rather than to present operational growth as an end in itself. On that basis, [Chapter 3.3.](#) presents the substantive monitoring findings, structured into identified best practices, remaining challenges, detected irregularities in individual cases, and a detected qualitative pattern of irregularities, before concluding with a brief discussion of findings stemming from IMM's successfully piloted "Letter of Rights and Complaints" procedure. [Chapter 3.4.](#) then addresses IMM CB's referrals of detected irregularities and relevant follow-ups on IMM-initiated investigations. This is followed by a separate section on migrants' health care and emergency medical services ([Chapter 3.5.](#)). The Chapter concludes with an overall assessment ([Chapter 3.6.](#)), synthesising the key findings from [Chapters 3.3.](#), [3.4.](#) and [3.5.](#), while also factoring in IMM's 2025-introduced methodological and operational novelties, in particular the notification channels established through IMM's online contact form and electronic mailbox, as well as the IMM CB's monthly recommendation procedure vis-à-vis the MoI following each mission cycle ([Chapter 3.6.1.](#)). This structure ensures that IMM's 2025 annual recommendations to the MoI, which then logically follow in [Chapter 4](#), read naturally as targeted proposals addressing all the issues identified in [Chapter 3](#).

For the purposes of this section of the Report it is of particular importance to recall that the IMM is not a state body tasked with establishing disciplinary, criminal or other liability. Accordingly, where, after verification and triangulation of the available information, a potential irregularity in police officers' actions could not reasonably be ruled out, the matter was classified as a detected irregularity within the meaning of IMM's mandate and referred to the competent national authorities for investigation. A 'detected irregularity' does not imply that the IMM established wrongdoing. A detected irregularity, whether identified in an individual case/instance or as a qualitative pattern, indicates a matter requiring follow-up by the competent national authorities through the legally prescribed proper investigations.

In terms of methodological transparency, it must be noted that the quantitative indicators, tables and figures used throughout this Chapter are drawn from 3 distinct but interrelated datasets, each based on information recorded in monitors' operation reports and each with its own counting unit and analytical function: the location- and facility-monitoring dataset, the migrant-interview dataset, and the consolidated dataset of unique interviewed migrants. The location and facility dataset is record-based. Its counting unit is therefore the individual monitoring record, as reflected in the corresponding monitor's report, linked to a specific monitoring operation at a given date, location and location type, rather than the unique location or facility as such. Repeated on-the-spot checks

⁴ Findings also include one event-triggered monitoring operation initiated in December 2024 and followed up into early 2026. It is, however, not included in the 2025 data in [Chapter 3.1.](#), which covers only monitoring missions and operations initiated in 2025. The relevant findings from said event-triggered monitoring operation are nevertheless included in the 2025 key findings ([Chapter 3.3.3.1.](#)) and hence in the overall evidence base ([Chapter 3.6.](#)) and IMM's recommendations ([Chapter 4](#)).

of the same location/facility have consequently not been treated as duplication and excluded. As an inherent feature of IMM's monitoring design, which is based on regular, cumulative and, as a rule, unannounced monitoring missions and operations, such reoccurring on-the-spot checks enable assessments not only of single instances, locations or snapshots, but equally of whether safeguards remain operational over time.

By contrast, the interview-based analysis requires a distinction between conducted interviews and unique interviewed persons. Accordingly, the Chapter relies both on the migrant-interview dataset and, where required for more precise substantive analysis, on the consolidated dataset of unique interviewed migrants, in which duplicate interview records have been excluded and only the most recent and most comprehensive interview record and corresponding assessment retained. This is particularly important because the interview data record only a very limited number of complaints and negative indicators. In such circumstances, it is methodologically relevant to determine whether several negative/positive indicators relate to one and the same interviewed migrant or whether they are distributed across a larger number of different migrants. Certain variables therefore require cross-checking against the unique-migrant dataset, particularly where the analytical question is whether the findings stem from one or a few isolated interviewees with multiple negative/positive indicators, or rather point to a broader distribution across many interviewed migrants, indicating patterns rather than isolated cases/instances. A similar logic applies to the location and facility dataset, which must be read in light of the type and purpose of the monitored location/facility, since not all variables are applicable to all location/facility types and the relevant benchmarks differ, in particular between temporary accommodation standards in police settings and longer-term accommodation standards in reception-type facilities. This in turn allows the dataset to be used not only for identifying broader patterns, but also for determining the most frequently recorded shortcomings in temporary and longer-term accommodation facilities separately.

Finally, different aggregation strategies may produce different descriptive outputs, though not necessarily also resulting in different findings. This is, however, inherent to any structured analysis of highly complex empirical monitoring data. It does therefore not undermine the value of the findings, provided that the applicable counting units, denominators, variable-specific limits and inference logic are made explicit. In that sense, transparent methodological disclosure as provided here, and where appropriate at specific other points throughout the Report, is the necessary safeguard of both critical reading and meaningful interpretation of IMM's 2025 key findings, as well as of the recommendations derived from that evidentiary basis.

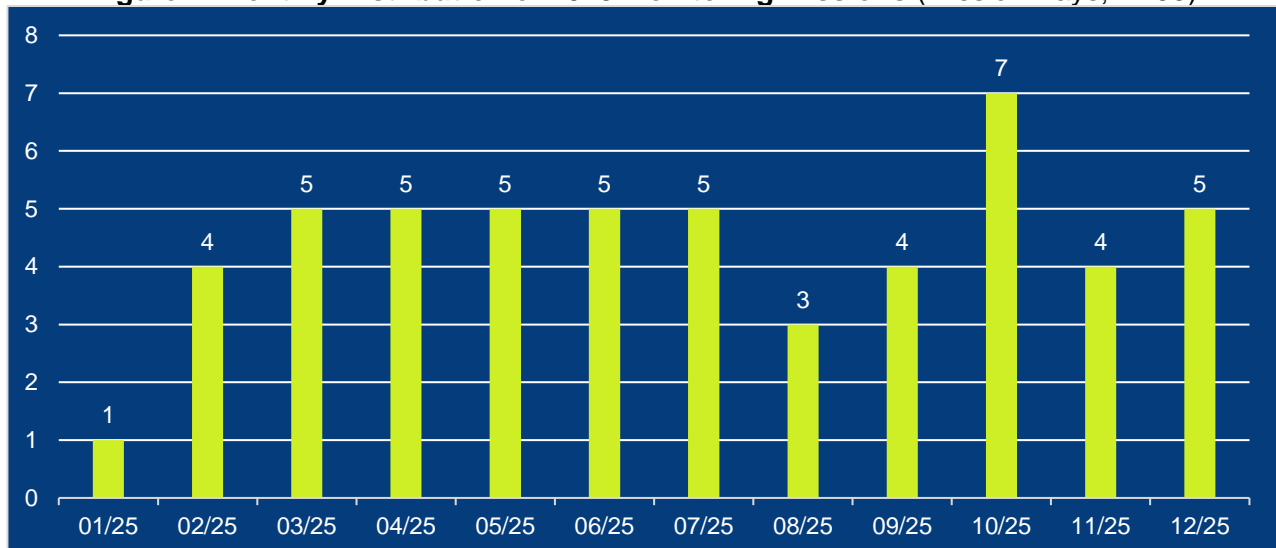
3.1. Empirical Base and Monitors' Field Presence

IMM monitors' 2025 field presence data covers all monitoring missions and operations initiated and conducted in the field throughout 2025, counted by reference to the date, location and type of the field operation itself. This is the relevant counting point for [Chapter 3.1.](#), notwithstanding that individual monitoring activities as a rule continue after the field operation has been concluded, incl. through analysis of case files, Mol IS printouts, reports and activities of the GPD and other sources, until the monitoring operation reports are presented, discussed and finally adopted. In 2025 a total of 204 monitoring operations were conducted in the framework of 53 monitoring missions (mission days).

As a rule, IMM monitoring operations were conducted as unannounced on-the-spot checks (200/204).⁵ Where prior announcement exceptionally occurred (4/204), it was operationally warranted and did not serve to provide the Mol with advance notification, but to secure access to restricted areas or the practical conditions necessary for efficient monitoring. In 2025, only 4 monitoring operations were announced to the Mol in advance: 1 at the Airport Police Station Čilipi, 1 at a border police facility in order to meet with a Frontex' FRO officer, and 2 at a (transit) reception centre in order to facilitate interview consent and interpretation services. The overall count of 204 monitoring operations also incl. the 52 interviews conducted with 50 migrants in 2025. Since migrant interviews constitute a distinct type of monitoring operation with a specific objective, they are analysed separately in greater detail later on.

The following three figures (Figure 2, 3 and 4) display the number and the monthly distribution of all 2025 monitoring missions and operations, whereas a detailed listing incl. dates of all monitoring missions and the exact locations/facilities of all conducted monitoring operations (incl. migrant interviews) is provided in [Annex 7](#) (Tables 9 and 10).

Figure 2. Monthly Distribution of 2025 Monitoring Missions (Mission Days; N=53)



⁵ Even in previous years, in fact since IMM's very establishment back in June 2021, monitoring operations/activities were as a rule conducted *de facto* unannounced. Initially this was done by merely notifying the Mol that IMM's monitors will be on mission within the next day(s), but without providing any further details on exact monitoring times or locations. Said procedure has been described transparently already in the [2021 IMM Semi-Annual Report](#) (p. 8).

Figure 3. Monthly Distribution of 2025 Monitoring Operations (N=204)

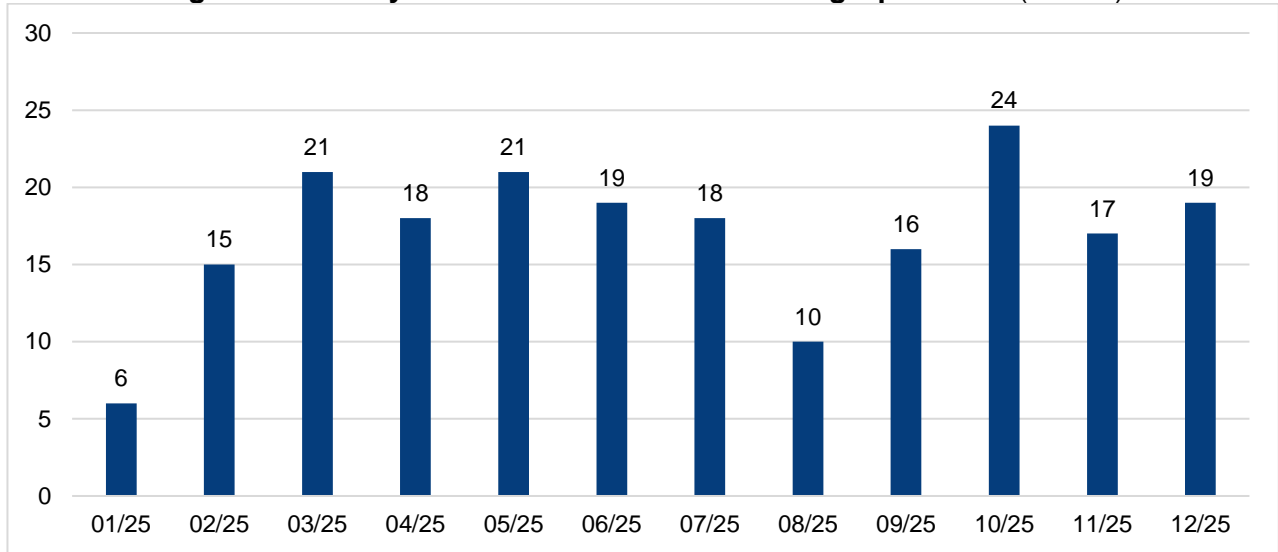
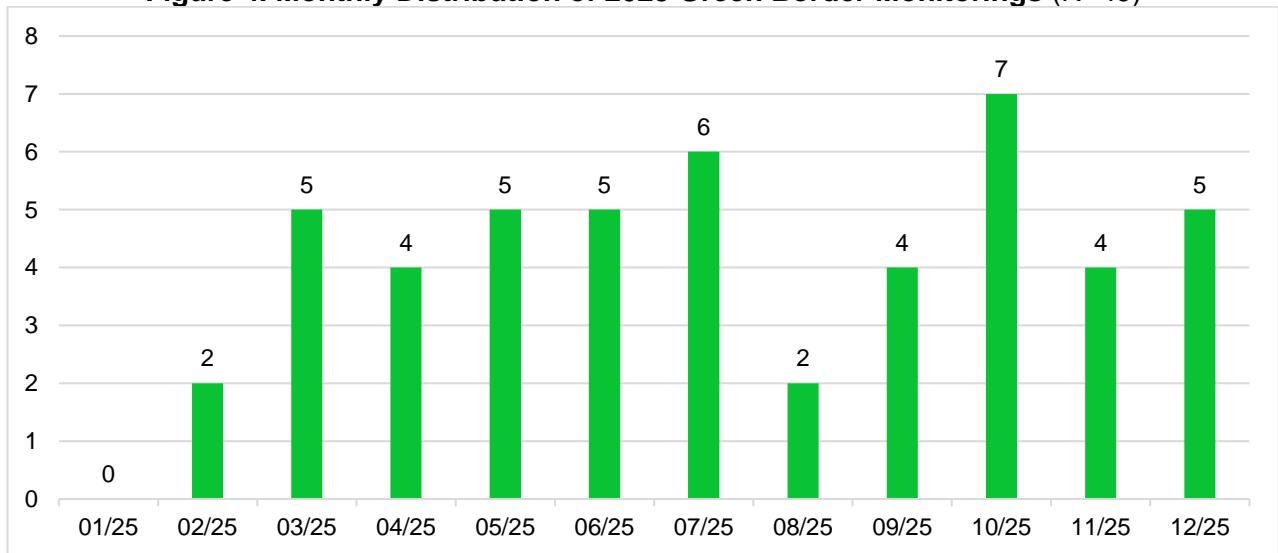


Figure 4. Monthly Distribution of 2025 Green Border Monitorings (N=49)



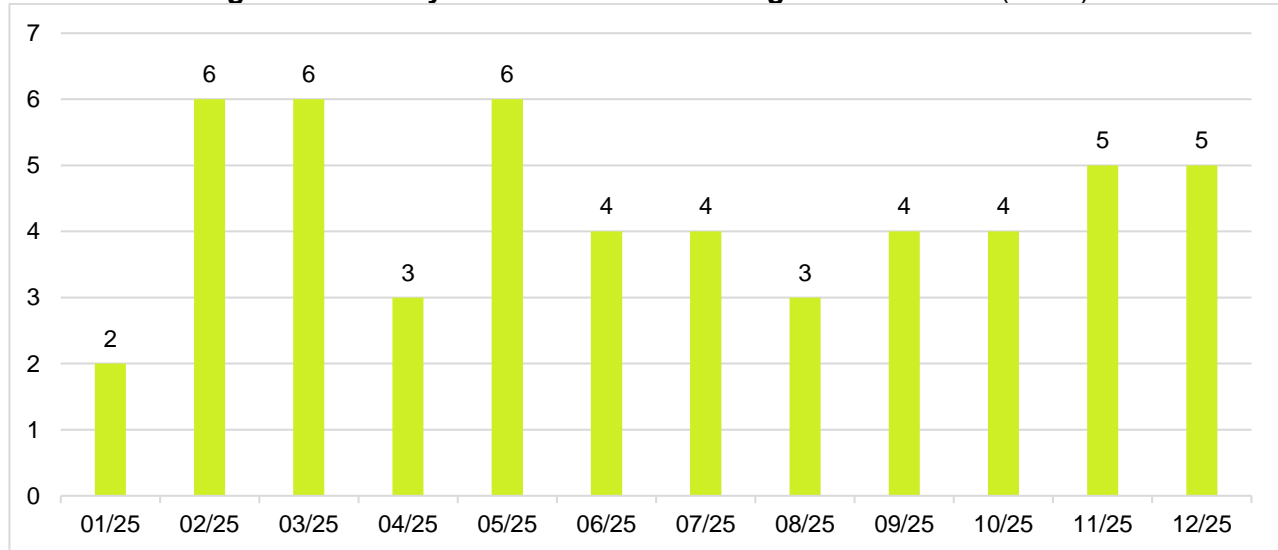
Compared with earlier monitoring periods, IMM’s field presence in 2025 increased markedly. Using the previous reporting period as the most robust comparator, field presence in 2025 was more than tripled, both in terms of location- and facility-based on-the-spot checks and in terms of mission days. Even excluding migrant interviews conducted systematically throughout 2025 and focusing only on the 152 location/facility on-the-spot checks, the IMM’s field presence in 2025 remained substantially higher than in the prior reporting period. Once the different length of the two periods is taken into account, IMM’s 2025 field presence amounts to 3.8 times the earlier number of on-the-spot checks and 3.31 times the earlier number of mission days.⁶ After the lower level of activity in 01/2025, due

⁶ For the period before 2025, the most robust comparison is with the previous reporting period, rather than across all earlier phases of IMM activity, because counting rules were not fully consistent between 06/2021 and 12/2024, nor was the monitoring operational throughout the entire period. The most reliable indicator is therefore the number of conducted location/facility on-the-spot checks, read together with the number of mission days. During the period from 06/2023 to

to the relaunch of field operations and the introduction of the upgraded monitoring methodology, field presence was fairly evenly distributed across the remainder of the year. At the same time, 2025 introduced and then maintained a systematic focus on regular unannounced green border monitoring operations (49). In practical terms, this means that on average IMM monitors were present in the field on a weekly basis (53 missions) and conducted targeted monitoring operations (204) on average almost four times per week.

As part of that 2025 field presence, IMM monitoring operations also strongly focused on systematically and regularly conducting interviews with migrants, totalling 52 conducted interviews in 2025 with overall 50 interviewed migrants. Interviews were conducted exclusively with adults due to considerations of informed consent and respect for the do-no-harm principle. At the same time, the analytical distinction between conducted interviews and interviewed persons must be read carefully: a single interview often shed light not only on the self-reported lived experience of the individual interviewed, but also on the broader factual circumstances affecting accompanying family or group members, which were then further checked through case-file analysis and other follow-up sources. For counting purposes, however, only the person interviewed by monitors who actually provided informed voluntary consent was counted as an interviewee, notwithstanding that the lived experience of the entire family or group (when applicable and as relevant) was factored in the assessment and the overall evidentiary basis.⁷ In line with the fairly even monthly distribution of monitoring operations throughout the year, migrant interviews were also conducted regularly on a monthly basis, as the following figure shows (Figure 5), whereas a detailed listing of dates and locations of conducted interviews with migrants is provided in [Annex 7](#) (Table 10).

Figure 5. Monthly Distribution of 2025 Migrant Interviews (N=52)



12/2023, covering 6 months of uninterrupted effective monitoring activity, the IMM carried out 20 location/facility on-the-spot checks across 8 mission days. By contrast, during the uninterrupted 12-month period from 01/2025 to 01/2026, the IMM carried out 152 location/facility on-the-spot checks during 53 mission days, excl. the event-triggered monitoring initiated in 12/2024 and excl. migrant interview operations. Once the difference in period length is taken into account, this corresponds to an increase of 280% in location/facility on-the-spot checks and 230% in mission days.

⁷ Early in 2025, for example, monitors interviewed one migrant at the BPS Cetegrad, while the substance of the interview and subsequent case-file analysis related to the experience of the entire group of 5 migrants encountered, incl. one child. For counting purposes, that monitoring operation was recorded as 1 operation, 1 interview and 1 interviewee, rather than 5 operations, 5 interviews and 5 interviewees.

Most migrant interviews in 2025 were conducted in (transit) reception centres, due to IMM monitors only exceptionally encountering migrants in other locations during monitoring operations. This needs to be factored in when reading monitoring findings stemming from migrant interviews, since the migrant population encountered in (transit) reception centres is most likely not representative of the overall migrant population which entered and/or transited Croatia during 2025. Most of those who, upon registration, declared an intention to request international protection did not later actually apply for international protection, nor did they arrive at or remain in (transit) reception centres following police instructions. Instead, they continued their journey towards final destinations in other EU countries. More than 90% in 2025 and 95% in 2024 did so, which confirms that Croatia remains a country of transit, not a final destination ([Chapter 3.6.1.](#)). To this must be added the unknown share of the migrant population which entered and/or transited Croatia without any registration or detection at all. In that sense, IMM's monitoring findings stemming from interviews, must not be misread for findings representative of the overall daily encounters of police officers with migrants in 2025. At the same time, this does not make the interview sample analytically weak, but rather specific in view of its non-representative focus and purpose. The interviewees basic characteristics and background indicators are therefore also relevant in assessing whether the sample shows any obvious sign of major sampling distortion likely to affect the findings in a crucial way. Looking at the characteristics and backgrounds of interviewed migrants (N=50), most of them are male (39; average age 33 years), compared to female interviewees (11; average age 37 years), as the data presented in Table 3 show:

Table 3. Interviewed Migrants: Sex and Age (N=50)

Age Groups	18-25	26-33	34-41	42-50	51-59	≥60	Total
Male	13	8	12	4	2	0	39
Female	3	0	5	2	0	1	11
Total	16	8	17	6	2	1	50

Interviewed migrants' nationalities/citizenships, although very diverse, in the top 4 incl. Russian (11), Turkish (6), Nepali (5) and Syrian (4), which together make up 52% of all interviewed migrants, whereas other nationalities are less represented, with either 2 interviewees (Egyptian, Iraqi, Indian, Ukrainian, Moroccan and Pakistani), or only 1 interviewee (Ivorian, Cuban, Lebanese, Burundian, Serbian, Venezuelan, Georgian, Algerian, Palestinian, Sudanese, Bosnian and Sierra Leonean). Both the male majority and the top 4 nationalities of interviewed migrants broadly reflect the sex distribution and leading nationalities in 2025 as recorded by the Mol, while factoring in the relatively small sample (50) compared to the overall migrant population (14.928⁸) and bearing in mind that most, though not all, interviewed migrants were identified as international protection seekers at the time of the interview. These basic indicators do not suggest an obvious sampling distortion likely to have affected the key findings stemming from migrant interviews in a crucial way, especially in view of IMM's mission and mandate.

In terms of interviewees' legal status, most were identified by monitors as international protection seekers (30), i.e. persons who had applied for international protection in Croatia, compared to those who had not done so and were considered irregular migrants (20), e.g. persons whose application for international protection had been rejected, who had been issued an expulsion/removal decision, whose work permit had expired and who no longer had a right to stay, etc. With regard to vulnerabilities, which were detected among 12 interviewed migrants, it needs to be stressed that

⁸ Mol, [Statistički pokazatelji tražitelja međunarodne zaštite prema državljanstvu i spolu za razdoblje 01.01. - 31.12.2025.](#)

these were determined mainly on the basis of self-reported indicators and accompanied by monitors' assessments, and therefore should not be interpreted as clinically verified diagnoses or conclusively established conditions. Detected vulnerabilities incl. survivors of torture/trauma (7), persons with impaired mental and/or physical health (4), persons at risk due to sexual orientation and/or gender identity (2), and persons with addictions (alcohol, drugs, or medication) (1), whereas no persons falling within the following vulnerability categories were identified: victim of trafficking in human beings; unaccompanied or separated child/minor; child/minor accompanied by parents, other family members, or a guardian; pregnant woman or girl; breastfeeding woman; woman at risk of gender-based violence; domestic violence victim; person at risk of suicide; person with a disability; older person; person who has survived sexual or gender-based violence or another violent criminal offence; stateless person. Out of the 12 interviewed migrants with detected vulnerabilities, 2 migrants presented 2 vulnerabilities each, while no migrant was found to have 3 or more vulnerabilities. Vulnerabilities were much more frequent among international protection seekers (9) than among irregular migrants (3).

Most interviewed migrants were detected within the Croatian territory (32), followed by those detected at border crossings (12) and at the green border (5), whereby 1 did not know/respond. When factoring in the interviewees' different legal status, international protection seekers were mainly detected within the Croatian territory (16), at border crossings (10) and at the green border (3), or did not know/respond (1), compared to irregular migrants, who were also mainly detected within the Croatian territory (16), but only exceptionally at border crossings (2) or at the green border (2). A large share of interviewees was detected within the scope of anti-smuggling police operations (15), most of them international protection seekers (10) and some irregular migrants (5). Only exceptionally were attempts to escape police apprehension reported among those interviewees detected in smuggling operations (2). In general, interviewees did not resist police procedures (49). Out of all interviewees, only 5 reported any kind of police use of force or coercive measures during police apprehension procedures, comprised mainly of physical use of force (4) and use of restraints (1). Further findings relevant for assessing police officers' respect of the principle of non-refoulement, the prohibition of collective expulsion, and the prohibition of torture and other forms of ill-treatment with regard to interviewed migrants are discussed in detail in [Chapter 3.3](#).

3.2. Evidentiary Conditions and Monitoring Access

Overall, IMM monitors, as in previous reporting periods since June 2021, had broad and generally unrestricted access to data, files, locations and facilities during their on-the-spot checks, as foreseen by the Cooperation Agreement. In the few instances in which monitors could not access certain data or files directly during on-the-spot checks (6/103 on-site data-access requests were not or not fully provided; 4/69 Mol IS printout requests were partial/not provided), the reasons were justified and the requested data or files were subsequently provided electronically through the IMM office by the Mol contact officer, enabling monitors to complete their assessments. In that sense, the practical level of access during field operations remained clearly positive and sufficient to enable meaningful monitoring, broad evidentiary verification and, where required, further follow-ups.

A similar positive assessment applies to the Mol's monthly statistical input for the monitors' FRRAs, although with certain qualifications. As already noted in the previous reporting period, the monthly statistics were, as a rule, not provided by the 10th day of the following month. In 2025, however, these delays were in most cases limited, ranging from 1 to 6 days in 9 instances, while more substantial delays ranging from 10 to 25 days in 3 instances remained the clear exception. At the same time, and this should be expressly acknowledged, the Mol significantly improved both the scope and quality of the statistical data provided to the IMM for the monitors' FRRAs. As of early 2025, the monthly input incl. not only data on migration trends at the Croatian external border, but also registered intentions to apply for international protection, illegal entry, movement and stay within the Croatian territory, together with place of detection and place of presumed entry. In addition, the Mol also started providing its own basic risk-assessment parameters for the forthcoming months. This was a major improvement, as it created a much more robust data basis for the monitors' FRRAs. Read in that broader context, the (minor) delays in 2025, although not ideal, had no crucial impact on the timeliness or quality of monitors' FRRAs.

A more persistent difficulty emerged, however, in relation to the sharp increase in the number of requests for data, files and information towards the Mol that followed from the substantial increase in IMM operations. As [Chapter 3.1.](#) has already shown, IMM's field presence and operations in 2025 more than tripled compared to the previous reporting period. This consequentially resulted in a significant increase in IMM's access and information requests directed at the Mol, which in practice created bottlenecks, delayed responses and, in some instances, the need for repeated follow-up requests, not all of which were fully successful. This challenge was repeatedly communicated to the Mol and remained present throughout 2025 and at the time of finalising this Report ([Chapter 3.4.](#)). The said challenge appears plausibly linked not only to the volume of requests as such, but to a clear capacity mismatch between IMM's increased operational scope and the Mol's cooperation capacities, which, in institutional and human-resource terms, remained essentially at the pre-2025 level. In that sense, the issue is best understood not as one of unwillingness to cooperate, but as a practical coordination and capacity challenge generated by the asymmetry between a substantially upgraded monitoring mechanism and an unchanged cooperation interface on Mol's side. This matters because the strength of the evidentiary basis depends not only on what could be observed on-the-spot, but also on the timeliness and completeness of documentary follow-ups once detected issues required further clarification beyond the monitor's field operation itself.

This broader context is particularly relevant when assessing the more sensitive question of access to files and materials relating to complaints, internal checks and monitored instances of possible police officers' irregularities in action. Overall, the vast majority of data, file and information requests was eventually fulfilled. At the same time, access to files relating to finally disposed complaints concerning alleged unlawful actions of police officers towards migrants and applicants for international protection, as well as access to activities and reports of the GPD regarding such allegations, remained a challenge. This became particularly evident in the framework of annual follow-ups on 2025 IMM-initiated investigations, as well as in monitored instances of police officers' misconduct and related disciplinary and criminal investigations and proceedings. Although this concerned only a very small number of cases, these cases were by their nature serious, and timely and effective access to the relevant files remains essential for IMM's assessment whether complaints and investigations are being handled effectively. The resulting difficulty therefore did not undermine IMM's monitoring generally, but it did limit one particularly important part of IMM's mandate, namely the possibility to monitor follow-ups on serious allegations concerning police officers' conduct towards migrants. The relevant details are presented later in [Chapters 3.3.3.](#), [3.3.4.](#) and [3.4.](#)

Several issues relating to migrant interviews merit separate attention within the broader meaning of access, because they directly affected the reliability and evidentiary value of interview-based findings. As of early 2025, and against the background of introducing this type of monitoring operation on a regular and systematic basis, the IMM and the MoI established an operational arrangement ensuring that interpretation services, whether in person or by telephone, were available to monitors during on-the-spot checks through the same mechanisms used by border police officers. As a result, interpretation, where needed, was broadly available. This must be recognised as an important operational improvement, since it directly affected both the feasibility and the quality of migrant interviews. At the same time, the operational model for organising interviews required further refinement. Interviews were initially conducted without prior arrangements, which led to delays and refusals, as prospective interviewees first had to be identified and then asked on-the-spot whether they wished to share their experience. This proved operationally burdensome and methodologically suboptimal. The IMM CB therefore early on authorised a designated IMM CB member with direct operational access to, and contacts in, (transit) reception centres to make the necessary prior interview arrangements. This enabled informed consent forms to be provided in advance, allowing prospective interviewees sufficient time to read the form, understand its purpose, and decide freely whether to participate in the interview. Together with prior arrangement of interpretation and scheduling, this made monitoring operations more efficient and interview conditions considerably less stressful for both interviewees and monitors.

The informed consent form itself further strengthened the quality and transparency of the interview setting. It explains the purpose of the interview and the role of the IMM as an independent monitoring mechanism, clarifies that participation is voluntary, confidential and anonymous, that no personal data will be published, and that interviewees are free not to answer individual questions and to withdraw their consent in the course of the interview. It further explains that personal data may be used only for verification and follow-up purposes, incl. checking case files or requesting additional information from relevant state authorities, and, where a possible irregularity in the police officers' conduct or action is indicated, for referral to the competent authorities in order to enable proper investigations. At the start of each interview, monitors ensured that the interviewee had understood the form and provided any additional explanation necessary to secure valid consent and full

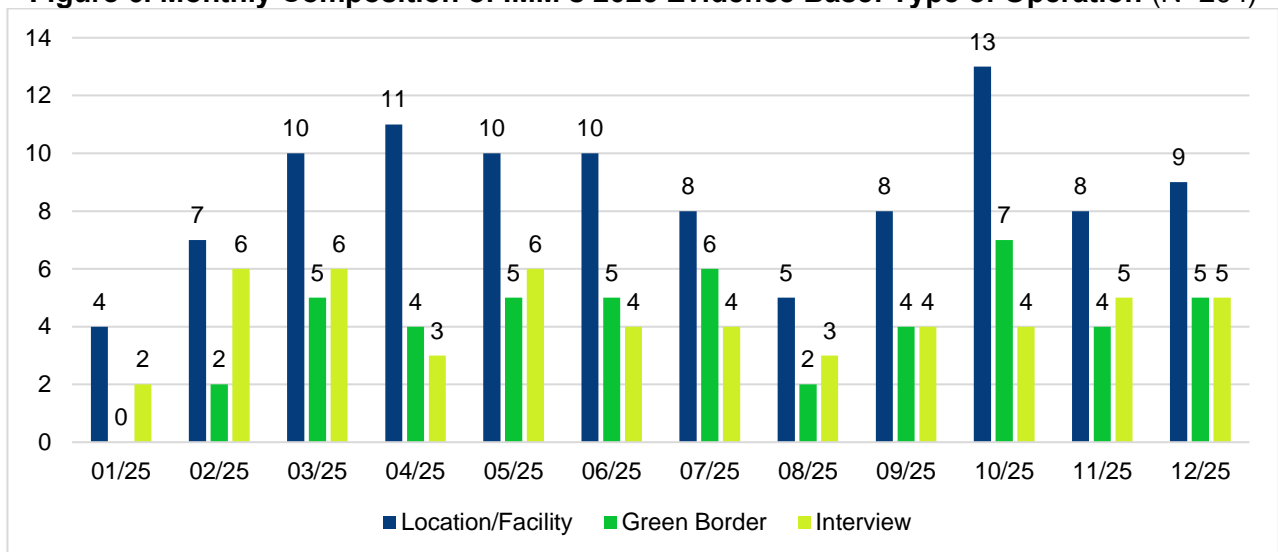
awareness of how personal data might be used. All interviews were conducted without the presence of police officers, while monitors took notes rather than recording the interviews. Interviewees' case files were made available on-the-spot and/or electronically, with additional follow-up information requested through the IMM Office from the Mol. Taken together, these safeguards show that interview-based findings in 2025 rested not merely on access to interviewees as such, but on conditions capable of supporting confidential communication, informed interview participation and subsequent triangulation.

Taken as a whole, IMM's access to data, files and facilities in 2025 remained sufficiently broad and timely to enable meaningful, evidence-based and triangulated monitoring. The central point of this section is therefore not merely that access was generally ensured, but that the conditions of access were in practice strong enough to support a robust evidentiary basis for the findings presented in the following chapter ([Chapter 3.3](#)). The main access-related challenge did not lie in on-the-spot cooperation as such, which remained strong, but rather in the growing strain placed on documentary follow-ups, complaint-related files and investigation-linked information flows as a probable consequence of IMM's significantly expanded operations and requests. In that sense, the experience of 2025 points less to a deficit of cooperation in principle than to the need for a more clearly operationalised, capacity-matched and forward-looking cooperation and oversight framework in the future, particularly with regard to documentary follow-ups and other sensitive forms of documentary access.

3.3. Substantive Monitoring Findings

The following sections present IMM's substantive monitoring findings for 2025 on the basis of the full set of monitoring missions and operations conducted throughout the year, incl. on-the-spot checks, green border monitoring operations and interviews with migrants (Figure 6), with subsequent triangulation, for example through case-file and documentation analysis.

Figure 6. Monthly Composition of IMM's 2025 Evidence Base: Type of Operation (N=204)



Pursuant to Art. 3 para. 9 of the Cooperation Agreement, the IMM CB shall base its findings in the annual reports on the monitoring reports submitted by IMM monitors, covering all monitoring missions implemented in the respective calendar year. While this necessarily limits the pool of data

on which the IMM CB relies for its annual findings and recommendations, it at the same time ensures that its findings and recommendations are indeed both evidence-based and traceable, whereas an extremely broad and diverse pool of data and sources remains relevant within the scope of monitors' FRRAs as well as for each monitor's substantive assessment of every case or instance observed. The strengthened and methodologically structured 2025 evidence base is comprised of 103 location- and facility-monitoring reports, 49 green border monitoring records, 52 migrant interview reports, and a consolidated dataset of 50 unique interviewed migrants, supplemented by monitors' annual narrative reports and documentary verification.

As emphasised throughout [Chapters 1](#) and [2](#), IMM's findings are derived through a structured evidentiary approach: monitors record factual observations, triangulate location/facility- and interview-based information with additional documentation, and distinguish between (a) indications that may amount to a detected irregularity within the meaning of IMM's mandate, and (b) shortcomings that do not reach that threshold, but nevertheless merit improvement-oriented recommendations and follow-ups. The purpose of this Chapter is therefore not to exhaustively reproduce all findings from all monitoring reports as collected through the monitoring tools, but to distil from the overall evidence base those findings which, in light of the available data pool, are methodologically the most robust and substantively the most meaningful against the backdrop of IMM's mandate and for the purpose of its annual assessment. In that sense, the previous figure (Figure 6) is incl. to make transparent the monthly composition of monitoring operations producing the evidence base from which the substantive findings follow.

The findings themselves are presented in a differentiated but complementary manner as identified best practices ([Chapter 3.3.1.](#)) and challenges ([Chapter 3.3.2.](#)), while instances reaching the threshold of a detected irregularity are treated separately, either as individual cases ([Chapter 3.3.3.](#)) or as a qualitative pattern thereof ([Chapter 3.3.4.](#)). This is followed by more representative findings stemming from the successfully piloted "Letter of Rights and Complaints" procedure ([Chapter 3.3.5.](#)). Related referrals and follow-ups are then addressed specifically in [Chapter 3.4.](#) The Chapter subsequently proceeds to migrants' health care and emergency medical services ([Chapter 3.5.](#)), before concluding with an overall assessment ([Chapter 3.6.](#)), which synthesises the key findings of all previous chapters and serves as the analytical bridge to the annual recommendations set out in [Chapter 4.](#)

3.3.1. Best Practices

The best practices identified in 2025 are presented on the basis of three complementary strands of monitoring evidence: migrant interviews, location- and facility-monitoring, and monitors' annual narrative reports. Analysed together, these sources make it possible to identify recurring examples of proper police conduct towards migrants, safeguards that were not merely formally prescribed but operational in practice, and patterns of constructive institutional cooperation with external monitors. The findings set out in this section are therefore not isolated positive examples, but as recurring patterns supported across multiple monitoring operations and corroborated through structured tools, documentary verification and qualitative reporting.

At the same time, the nature of those sources differs, as does the way in which they are analysed and presented. The findings derived from migrant interviews and from location- and facility-monitorings are based on standardised monitoring tools and corresponding datasets, but do not stem from those reports in isolation. Rather, they rest on a broadly triangulated evidentiary basis in

which monitors combined factual observations with additional sources, documentation and follow-up verification until a sufficiently robust basis for a confident assessment in each instance observed had been established. The findings derived from monitors' annual narrative reports are more qualitative and illustrative in character. They are therefore presented in a more synthetic manner, in order to highlight recurring themes, experience-based assessments and selected examples that further confirm and contextualise the structured findings recorded through the standardised monitoring tools.

Against that background, the best-practice findings are structured in line with the main thematic clusters covered by IMM's mandate, beginning with safeguards that make meaningful oversight, accountability and evidence-based assessment possible, and then moving through core fundamental-rights and procedural safeguards to vulnerability-sensitive treatment and, where relevant, material and accommodation-related conditions in monitored facilities. The three subsections below should therefore be read as complementary layers of the same evidentiary picture: interview-based findings reflecting migrants' self-reported lived experience ([Chapter 3.3.1.1.](#)), structured location- and facility-based findings ([Chapter 3.3.1.2.](#)), and qualitative corroboration and illustration provided through monitors' 2025 annual reports ([Chapter 3.3.1.3.](#)).

3.3.1.1. Interview-Based

Source-based verification and credibility of interview findings: The findings identified through migrant interviews do not rest on migrants' statements in isolation. As already explained, the interview setting in 2025 was specifically organised so as to support confidentiality, informed participation and subsequent verification. The submitted monitoring reports show that interviews were regularly used as one core component of a broader evidentiary reconstruction and, where needed, supplemented by case files, police documentation, MoI IS records, direct observation and additional follow-ups. All 52 interviews were conducted in a confidential setting, without the presence of police officers and after interviewees had provided their informed consent. Where needed, interpretation for the interview itself was ensured, either on-site or by telephone, and in practice monitors and interpreters often also acted as cultural mediators. The monitoring reports further show that monitors were able to conduct the interviews and any related verification without obstruction.

On average, monitors relied on a minimum of 2.9 information source types per interview for triangulation. In 43/52 interviews, at least 2 source types were used to verify the information obtained, and in 26/52 interviews at least 3. The scope of triangulation necessarily varied depending on the circumstances of the monitored instance and the issues raised in the interview. The reports nevertheless show a consistent practice of continuing to collect and check relevant information until a sufficiently robust basis for an evidence-based assessment in each instance observed had been established. Further follow-up verification was still deemed necessary only in a limited number of cases and was then carried out in all of them. This is important because it means that the positive findings identified here do not rest on unchecked self-reporting, but on interview-based evidence that was as a rule documentary checked and contextually reconstructed.

Police officers' conduct, grievances raised to monitors and core fundamental rights: Read on the basis of 50 unique interviewed migrants, the interview findings point to a predominantly positive pattern regarding police officers' actions towards migrants and the protection of their fundamental rights, particularly in relation to issues lying at the core of IMM's mandate. In 50/50

cases, migrants stated that police officers had, by their appearance and insignia, enabled a clear and unambiguous conclusion that they were police officers. In operational contexts involving apprehension, transport and initial police procedure, clearly identifiable police officers are an important practical accountability safeguard.

The positive complaint-related picture is also of particular evidentiary value, but it must be read correctly. The monitors did not merely record whether a migrant had already submitted a formal complaint before speaking to the monitor. They first captured whether, when given the opportunity in a confidential setting, the migrant wished to raise any grievance, dissatisfaction or other issue regarding police officers' conduct at all. Only thereafter did they separately record whether any such matter had already been formalised in a complaint submitted before the interview, as well as whether alleged physical injuries had been reported or documented. On that broader basis, 47/50 interviewed migrants did not raise any complaint or other negative issue regarding police officers' conduct towards them. Only 1/50 had submitted a formal complaint before speaking to the monitors, and only 1/50 alleged physical injuries caused by police officers. Neither of those 2 cases was assessed by the monitors as an irregularity in police officers' conduct. The remaining 1 of the 3/50 cases in which grievances or dissatisfaction were recorded by the monitors is addressed separately in [Chapter 3.3.3.2](#). The positive pattern identified here therefore has greater evidentiary weight than a mere finding that prior formal complaints were rare or exceptional, since broader dissatisfaction, prior formal complaints, alleged physical injuries and the separately treated rights-relevant case were all captured and assessed separately.

These findings must not be read mechanically. A grievance raised to the monitors, a prior formal complaint, an alleged physical injury, and a later monitor-detected irregularity are not the same thing, nor do they in themselves establish wrongdoing. Their relevance lies in the fact that all were separately captured in a confidential setting and then assessed against a broader evidentiary triangulation. The same applies to the fact that 5/50 interviewed migrants reported some form of force or coercive measure during police apprehension. That entry captures the fact that force or coercive measures were used, not whether such use was unwarranted or unlawful. Across the indicators most closely linked to IMM's core mandate in this subsection, such as grievances regarding police officers' conduct, prior formal complaints, alleged physical injuries and reported police use of force or coercive measures, the relevant negative indicators remain concentrated in only 6/50 unique interviewed migrants, 1 of which is the separately treated monitor-detected irregularity ([Chapter 3.3.3.2](#)). Outside that case, the remaining more serious negative indicators trace back to only 5/50 migrants, and in none of those cases/instances did the monitors detect an irregularity in police officers' conduct. This is further confirmed by the monitors' final assessments recorded in the monitoring reports: in 49/50 unique-migrant cases, the monitors' final assessment was that no irregularities and/or violations of fundamental rights had been detected in the conduct of police officers.

Procedural safeguards and practical guarantees: The interview findings also point to a generally high level of respect for key procedural safeguards during police procedure. In 50/50 cases, migrants stated that access to food and water and access to toilets had been provided. In 47/50 cases, interpretation during police procedure was either provided or not needed because the migrant was able to communicate in a language used by the police. In 48/50 cases, health care was either provided or not needed. Likewise, contact with family members was either enabled or not requested in 46/50 cases, and contact with organisations providing assistance to migrants was

either enabled or not requested in 45/50 cases. Contact with diplomatic or consular authorities was either enabled or not applicable in 47/50 cases. Taken together, these findings indicate that, in the overwhelming majority of monitored cases, police procedure was accompanied by those practical safeguards most relevant for preserving dignity, reducing stress and enabling the meaningful exercise of fundamental rights from the outset of police encounters. The same overall pattern is visible in relation to information-related guarantees. In 47/50 cases, migrants stated that they had been informed of the reasons for the restriction of their freedom of movement. In 47/50 cases, they likewise stated that they had been informed of their rights in a language they understood. These findings suggest that, in the majority of monitored police procedures towards migrants, fundamental-rights-related information was not only formally available, but in practice communicated in a manner capable of being understood and relied upon by those directly affected.

Access to international protection and vulnerability-sensitive treatment: The positive pattern identified through migrant interviews is also clearly observable when analysed in view of the specific profile of the interviewed migrants. The sample was not limited to straightforward or low-risk cases. It incl. both applicants for international protection and irregular migrants, persons encountered in the context of anti-smuggling operations, and migrants in vulnerable situations. Against that background, it is particularly significant that 45/50 interviewed migrants stated that they had been informed of the right to apply for international protection, while 44/50 stated that they had also been informed of the procedure for obtaining international protection. In 34/50 cases, migrants stated that they had in fact requested international protection during police procedure and did so without obstruction. Read against migrants' legal status, the positive pattern remains clear: among migrants recorded as applicants for international protection, 27/30 stated that they had been informed of the right to apply for international protection, 27/30 that they had been informed of the relevant procedure, and 28/30 that they had in fact requested international protection during police procedure. These findings indicate that, within the monitored sample, access-to-protection safeguards were in the majority of cases communicated and operationalised in practice, incl. in situations involving vulnerability, distress or more complex procedural and tactical circumstances. This positive reading is further strengthened by the fact that vulnerabilities were identified among 12 interviewed migrants and that 15 interviewees had been encountered in the context of anti-smuggling operations. The sample therefore incl. a meaningful number of situations in which police officers were required to act in conditions of stress, vulnerability, complexity or heightened operational and tactical sensitivity. The best-practice pattern identified here should be read against that background, not as though it had emerged only in routine or frictionless cases/instances.

Dignity-related and security-related safeguards: Finally, the interview findings point to a generally appropriate police use of security-related measures where such measures were applied. In 33/50 cases, migrants stated that certain personal belongings had been temporarily taken from them during police procedure. In 30/33 of those applicable cases, migrants stated that they had been issued a written receipt confirming the temporary taking of such items. In 36/50 cases, migrants stated that they had been subjected to a search by police officers. In 35/36 of those applicable cases, the search was reported as having been carried out by a person of the same sex and with due respect for human dignity and physical or psychological integrity. This is not a merely technical point. In the context of police searches, esp. where bodily integrity, modesty, cultural sensitivity and diverse migrant backgrounds may all be engaged, respectful same-sex searches by police officers are an important dignity safeguard. The interview findings therefore point to a generally positive pattern in this regard as well.

Taken as a whole, the migrant-interview findings point to a clear best-practice pattern within the monitored sample. This does not mean that every safeguard was fully operational in every single instance observed, nor that no negative indicators were recorded. It does, however, mean that the positive pattern is not based on one isolated statement or one narrow set of responses, but on converging findings across police officers' conduct based on migrants' self-reported lived experience, grievances raised to monitors or the lack thereof, practical safeguards, information-related guarantees, access to international protection, dignity-related safeguards and the monitors' own final assessments after triangulation and follow-ups where indicated. It is also methodologically important that the more serious negative indicators are not dispersed across the entire sample. They remain limited and concentrated, which is why they are appropriately to be addressed in [Chapter 3.3.2.1](#), presenting identified challenges and, where relevant, separately in [Chapter 3.3.3](#), on detected irregularities and [Chapter 3.4](#), discussing referrals and follow-ups.

3.3.1.2. Location- and Facility-Based

Access, direct verification and meaningful oversight: Location and facility monitoring allows the IMM to verify not only what was formally recorded in files and systems, but what could actually be observed, checked and discussed on site. That is why the quality of access and cooperation is itself an important best-practice finding. In 2025, the submitted monitoring reports show a strongly positive pattern in that regard. Monitors recorded full access to monitored locations and facilities in 103/103 on-the-spot checks. Full access to all relevant data sources on site was recorded in 97/103 monitoring operations, while all requested documentation not available on the spot was subsequently provided electronically before monitors finalised their assessments. Where printouts from the Mol IS were requested, they were fully provided in 65/69 cases. On average, monitors relied on a minimum of 3.7 source types of information per location/facility oversight visit. These findings matter because they show that the location- and facility-based assessments in this Chapter rest on what could be directly observed and verified through broad triangulation, rather than on assumptions about what conditions or procedures might have been like.

Safeguards visible in the everyday functioning of the system: The location and facility monitoring reports also point to a number of safeguards that were visibly and institutionally embedded in everyday practice. Information on how to submit complaints was observed as displayed in 68/103 monitoring operations. In reception-type settings, general medical examinations of migrants upon arrival were carried out as a rule in 35/39 applicable monitoring operations. Registration of migrants was recorded as being conducted fully or partially in 82/101 applicable visits. These findings are important because they concern safeguards that should operate from the outset of migrants' police encounter or start of accommodation and because they are directly verifiable on site. They also show why location type and operational function must be factored into the assessment. Not all facilities are intended to perform the same functions, and the relevance of a given indicator therefore depends on the purpose of the monitored site. Taken together, however, they show that accountability-related, health-related and procedural safeguards were in a substantial part of the monitored sample not merely formally foreseen, but practically present. A similar point can be made in relation to transport and immediate operational procedures. Adults apprehended following an irregular border crossing were transported by marked police vehicles or by a combination of marked and unmarked vehicles in 86/103 monitored visits. As regards children and minors, transport was recorded as taking place by unmarked vehicles or by a combination of marked and unmarked vehicles in 102/103 visits. These findings point to an established operational

routine and not to improvised or ad hoc practice. They also matter from a dignity and protection perspective, particularly in relation to children and minors.

Differentiated approach and protection-sensitive practice: A further positive pattern emerges where the reports allow insight into how police officers approach and engage with different categories of migrants in practice. Where registration took place, individual profiling was recorded as being carried out fully or partially in 65/82 applicable visits. This is not an administrative side issue. It is precisely what enables police officers to distinguish between different legal statuses, vulnerabilities, family situations and procedural needs. In that sense, the location and facility reports indicate that differentiated approach was in a majority of applicable cases not only possible, but actually implemented. This is particularly relevant because the monitoring reports covered not only routine police settings, but also reception-type facilities and sites where the practical processing of families, children, minors, pregnant women and persons with disabilities could be directly observed. The positive findings identified here should therefore be read against the fact that the monitored sample incl. settings in which protection-sensitive treatment mattered in practice, not only in theory.

Material conditions and accommodation-related safeguards: The location and facility reports further point to a predominantly positive pattern in relation to material conditions and accommodation-related safeguards, provided that the applicable standards are read in light of the type and function of the monitored facility. Temporary accommodation capacities were assessed as compliant or partially compliant in 56/64 applicable visits. Longer-term accommodation in reception-type facilities was assessed as appropriate or partially appropriate in 39/39 applicable visits. Likewise, the rooms and facilities used for children, minors, pregnant women and persons with disabilities were assessed as appropriate or partially appropriate in 65/84 applicable visits.⁹ Monitors' additional notes in the reports help explain what those positive findings looked like in practice. At TPCS Trilj, for example, monitors recorded separate accommodation wings for men and for women, families and vulnerable persons, separate sanitary facilities, climatized rooms and a dedicated room for free-time activities. At Dugi Dol, monitors recorded that available capacity exceeded daily needs to such an extent that, where necessary, separate containers could be used for different vulnerable groups and even for persons of different national backgrounds, while dry meals in line with halal dietary requirements were also available. At TPC Tovarnik, monitors recorded a modern and well-equipped clinic, the presence of a psychologist, social workers and other support staff, family rooms, play and recreation areas, and multilingual notices and posters explaining migrants' rights, complaint possibilities, free legal aid, return and international-protection procedures. These examples do not replace the broader quantitative picture, but they help explain why the overall accommodation- and safeguards-related assessment remained predominantly positive in a majority of applicable monitored facilities.

These findings do not suggest that all monitored locations met all applicable standards in every respect. They do, however, show that the overall picture remained predominantly positive and that, in most applicable cases, the basic material conditions necessary for dignified treatment and orderly

⁹ In this context, the applicable standards differ depending on the type and purpose of the location, in particular between temporary accommodation in police settings and longer-term accommodation in reception-type facilities. As regards temporary accommodation in police settings, the relevant standards are laid down in Article 46(2) and Article 13(2) of the Ordinance on the Treatment of Third-Country Nationals (OG Nos. 136/2021, 145/2023). As regards longer-term accommodation in reception-type facilities, the relevant standards are laid down in Article 9 of the Ordinance on Stay in the Reception Centre for Foreigners and the Method of Calculating Forced Return Costs (OG Nos. 145/2021, 155/2022, 137/2023).

procedure were in place. Overall, the findings identified through regular and, as a rule, unannounced location and facility monitorings point to a clear best-practice pattern within the monitored sample. This general positive picture is not based on one or two isolated indicators or several snapshots, but on converging findings across access, direct verification, complaint visibility, health-screening safeguards, registration and profiling, transport routines, accommodation-related safeguards and the monitors' final assessments. Most importantly, in 103/103 location and facility monitoring reports, monitors concluded that no irregularities and/or violations of migrants' fundamental rights had been established in police officers' conduct. The limited number of partial or negative indicators captured through location and facility monitorings is hence relevant for [Chapter 3.3.2.2.](#) on identified challenges.

3.3.1.3. Factoring in Monitors' Annual Reports

Constructive cooperation and the practical value of meaningful access: The monitors' annual narrative reports strongly reinforce the positive patterns emerging from the structured data, particularly as regards cooperation with police officers, access to information and the practical value of the upgraded 2025 monitoring methodology itself. Several monitors expressly describe police cooperation as open, constructive and without hesitation, while stressing that access to files, documentation and, where relevant, the Mol IS enabled fuller reconstruction of the instances monitored and the necessary scope and depth of triangulation. They also repeatedly underline that unannounced on-the-spot checks proved particularly valuable because they provided a more realistic insight into everyday border policing routines, practical conditions, staffing, equipment and the actual implementation of fundamental rights safeguards. This matters because it confirms, from the monitors' own ethnographic experience across the entire year, that the credibility of the findings was not merely a formal result of standardised tools, but rested on meaningful access and on a monitoring methodology that functioned in practice.

Professional conduct and humane treatment in practice: The annual reports also provide qualitative corroboration of the generally positive pattern in police officers' conduct towards migrants. More than one monitor describes communication between police officers and migrants as correct, appropriate and professional, while also noting a visible element of empathy and humanity towards migrants in situations of stress, uncertainty or vulnerability. One monitor, for example, described a visit to PGP Korenica where migrants, incl. a 17-year-old and a very young child, stated in conversations without the presence of police officers that they felt safe and were satisfied with police treatment. Another highlighted a monitoring visit to PGP Dvor, where direct access to a newly arrived five-member family enabled monitors to follow the case from the very beginning, incl. in relation to access to the international protection procedure.

A particularly illustrative example was recorded at TPC Tovarnik, where a highly distressed father threatened self-harm and strongly resisted the procedure. According to the monitor's report, the situation was successfully de-escalated through calm and composed police conduct, the discrete removal of potentially dangerous objects, the assistance of an interpreter, the immediate provision of food, water and access to sanitary facilities, and the communication of rights in a language understood by the father and his family. The family later expressed intention to seek international protection and did not raise objections regarding police officers' conduct. This is important because it shows that positive practice concerns not only routine or low-pressure situations, but also more difficult and emotionally charged circumstances in which police officers' restraint, communication

and ability to de-escalate become particularly significant from the perspective of dignity and fundamental-rights protection.

The monitoring model itself as a best-practice development: Finally, the annual reports also identify the upgraded 2025 monitoring methodology itself as a source of best practice. Several monitors expressly note that the standardised instruments improved the speed, focus and quality of monitoring missions and operations, while the possibility of adding free-text notes enabled the recording of details not captured by closed indicators alone. Others stressed the added value of combining file analysis, direct observation, interviews with migrants, observation of accommodation conditions and, where relevant, observation of the green border. The reports likewise underline the value of the transdisciplinary composition of the monitoring teams and the IMM overall, pointing out that different professional backgrounds and expertise enabled better interviewing, more reliable credibility assessment and a more complete picture of police procedure and respect for migrants' fundamental rights. In that sense, the monitors' annual reports do not merely confirm positive findings regarding police practice. They also confirm that IMM's monitoring model became substantially more functional, focused and evidence-based in 2025. Finally, the monitors' annual narrative reports do not stand apart from the structured findings recorded through the two monitoring instruments. Rather, they provide a qualitatively rich layer of confirmation and illustration. Analysed alongside the structured data, they strengthen the conclusion that 2025 monitoring identified recurring patterns of proper police officers' actions towards migrants, functioning safeguards and constructive institutional cooperation with external monitors.

3.3.2. Challenges

The identified challenges presented in this section derive from the same three complementary strands of monitoring evidence as the best practices set out above: monitors' reports on migrant interviews, location- and facility-monitoring, and their annual narrative reports. Analysed together, these sources reveal a number of recurring shortcomings, operational constraints and unevenly implemented safeguards which remain relevant for sustaining and further strengthening the protection of migrants' fundamental rights in police practice. These findings should not be conflated with detected irregularities or potential violations of fundamental rights. Rather, they concern issues which, on the basis of the information triangulated by monitors and their assessments, did not reach the threshold of a detected irregularity within the meaning of IMM's mandate, but nevertheless merit clear identification, targeted follow-ups and improvement-oriented recommendations to the Mol. The challenge section therefore serves a different purpose from the best-practice section earlier on. It does not qualify the evidentiary robustness of the monitoring itself, nor does it convert every partial deficiency or operational burden into a rights-relevant irregularity. Its task is narrower and more precise: to identify those recurring shortcomings which remained visible within an otherwise predominantly positive monitoring picture, and to do so in a way that distinguishes between migrants' self-reported gaps in individual police procedures, more structural shortcomings in facilities and accommodation, and the recurring operational pressures identified by monitors and police officers themselves.

3.3.2.1. Interview-Based

Information-related guarantees not yet uniformly ensured: The clearest recurring challenges emerging from migrant interviews concern the communication of rights and procedures. While information-related safeguards were ensured in the vast majority of cases, they were not implemented uniformly. In 3/50 cases, migrants stated that they had not been informed of the reasons for the restriction of their freedom of movement. In 3/50 cases, they stated that they had not been informed of their rights. Information on free legal aid also appears less consistently recorded than some of the other information-related safeguards. Since that safeguard applies depending on the migrant's legal and procedural status, it is most meaningful when read against the relevant subgroup. Among migrants recorded by monitors as applicants for international protection, 22/30 stated that they had been informed of the right to free legal aid where applicable, while 7/30 stated that they had not and 1/30 did not know or did not want to answer. These figures do not undermine the broader positive picture. They do, however, show that more specific procedural guarantees were less consistently communicated than some of the more basic practical safeguards, based on the self-reported lived experience of migrants. A similar, though more limited, pattern is visible in relation to access to international protection itself. Across the full interviewed sample, 45/50 migrants stated that they had been informed of the right to apply for international protection, while 44/50 stated that they had been informed of the relevant procedure. Among migrants recorded as applicants for international protection, the corresponding figures are for both indicators 27/30. These remain strongly positive findings, but they also show that according to migrants themselves information on access to protection was not fully universal even within the subgroup in respect of whom that safeguard was particularly important.

Practical safeguards not uniformly available in every instance: The interview findings also reveal a small but relevant number of recurrently self-reported gaps in practical safeguards during police procedure. Interpretation during police procedure was not ensured in 3/50 cases. Health care was not provided in 2/50 cases. Contact with family members was not enabled in 2/50 cases. Contact with organisations providing assistance to migrants was not enabled in 2/50 cases. Contact with diplomatic or consular authorities was not enabled in 3/50 cases. None of these figures is high in itself. Analysed together, however, they show that the practical safeguards which were overwhelmingly present in the monitored sample were not yet uniformly ensured consistently in every single monitored instance according to migrants' own experience.

Dignity-related and documentation-related safeguards requiring further attention: The interview findings also point to a limited number of challenge indicators in relation to dignity-related and documentation-related safeguards. In 2/33 applicable cases, migrants stated that no written receipt had been issued for personal belongings temporarily taken by police officers. Likewise, while searches were in the overwhelming majority of applicable cases reported as having been conducted by a person of the same sex and with due respect for human dignity and physical or psychological integrity, the remaining applicable case was not positively recorded in those terms. The point here is not that the monitored sample reveals a broad pattern of dignity-related violations. It does not. The point is that safeguards of this kind, precisely because they concern bodily integrity, dignity and cultural sensitivity, require particularly careful and consistent implementation, notwithstanding the operational and tactical constraints and urgencies of police procedures as such that might necessitate exceptional limitations.

More serious negative indicators remain limited, but cannot be ignored: As already explained in [Chapter 3.3.1.1.](#), the more serious negative indicators captured through migrant interviews, such as grievances regarding police officers' conduct, prior formal complaints, alleged physical injuries and reported use of force, remain concentrated in a small number of cases, most of which did not lead to the monitors detecting an irregularity in police officers' conduct. That concentration as well as the monitors' assessment is important and prevents over- or misreading the findings. At the same time, it does not make those cases nor migrants' lived experience analytically irrelevant. On the contrary, it shows that even within a predominantly positive sample, a limited number of issues at the core of IMM's mandate continued to arise and therefore required careful attention and, where appropriate, separate treatment in the following sections ([Chapters 3.3.3.2.](#) and [3.3.4.](#)).

Taken as a whole, the challenges identified through migrant interviews remain limited in scope and concentrated in a relatively small number of instances observed, out of which only 1 was assessed as a detected irregularity in police officers' actions. The just presented challenges do not displace the broader best-practice pattern set out in [Chapter 3.3.1.1.](#) They do, however, point to recurring challenges relevant for the quality and consistency of police procedures, particularly in relation to fundamental rights-related information, interpretation, practical contact rights and the consistent implementation of dignity-related safeguards.

3.3.2.2. Location- and Facility-Based

Temporary accommodation remains the clearest location-based challenge: The strongest and most recurrent challenges identified through location and facility monitoring concern temporary accommodation and related practical conditions in border police settings. Temporary accommodation capacities were assessed as only partially compliant or not compliant in 23/64 applicable visits. Within that group, the most frequently recorded shortcoming was insufficient space (17/23), followed by lack of adequate beds (5/23) and inadequate heating and/or cooling (2/23). These shortcomings are not of equal importance at every monitored site. Their significance depends on the type and purpose of the facility, on the length of time migrants remain there, and on whether registration or other procedures are in fact carried out there. Even so, they are rights-relevant, since even short-term holding in police settings must provide conditions compatible with human dignity and basic practical needs.

The monitoring reports show that the practical difficulty was often not limited to one isolated technical defect. In a number of police and border police settings, monitors recorded that the available room was simply too small, that no properly equipped room for temporary accommodation existed at all, or that the room used for temporary holding was in practice an improvised or shared office-type space not suited for that purpose. In some cases, the reports also point to lack of accessibility for persons with disabilities. The recurring issue was therefore not one single missing item, but the fact that some police facilities were still not structurally equipped for temporary accommodation in a manner fully compatible with the applicable standards. The following facilities were assessed by monitors as non-compliant or not appropriate in view of the applicable standards: Border Police Stations Hrvatska Kostajnica, Novska, Ličko Petrovo Selo, Trilj and Gruda; Border Crossings Karasovići, Kamensko and Strmica; and Police Station Knin.¹⁰

¹⁰ Since this type of assessment does not fall within the core mandate of the IMM, only those locations which were assessed as clearly not meeting the applicable standards are expressly identified here. This does not mean that partially compliant locations were disregarded. On the contrary, all locations assessed as partially compliant, as well as those

Longer-term accommodation and facilities for vulnerable groups remain less consistent:

Longer-term accommodation in reception-type facilities presents a more positive overall picture, but not a flawless one. In 5/39 applicable visits, long-term accommodation was assessed as only partially appropriate. Likewise, facilities used for children, minors, pregnant women and persons with disabilities were assessed as only partially appropriate in 12/84 visits and as not appropriate in a further 19/84 applicable visits. These findings do not undermine the broader positive pattern identified in [Chapter 3.3.1.2.](#), but they do show that accommodation-related safeguards, especially where vulnerable groups are concerned, remained less consistent than some of the other safeguards captured through the monitoring reports. The shortcomings recorded by monitors suggest that the most common challenges in the longer-term accommodation category did not concern the complete absence of basic sanitation or beds, but rather insufficient space, inadequate heating/cooling (e.g. women accommodated in additional container reception facilities in RCAS Kutina informed monitors about inappropriate heating and cooling), lack of meaningful adaptation for persons with disabilities (e.g. lack of elevators in RCAS Zagreb (Porin)), and insufficiently differentiated accommodation arrangements for certain categories of residents, particularly where the needs of families, pregnant women or persons with disabilities should have been more specifically accommodated. The challenge in longer-term accommodation was therefore less one of outright inadequacy for the general resident population and more one of occasional partial adaptation and uneven suitability for specific categories of vulnerable persons.

Complaint visibility, health-related safeguards and differentiated approach remain uneven:

A further challenge cluster concerns safeguards that should, in principle, be relatively straightforward to implement consistently across all relevant settings. Information on how to submit complaints regarding police officers' conduct was not visibly displayed in 35/103 monitored sites. In reception-type facilities, a general medical examination on arrival was not carried out in 4/39 applicable visits. Registration of migrants was recorded as being conducted fully or partially in 82/101 applicable visits. Where registration took place, however, individual profiling was not recorded in 17/82 such visits and was only partially recorded in a further 9/82. This is not a minor operational issue. Profiling is what enables police officers to distinguish between different legal statuses, vulnerabilities, family situations and procedural needs. The challenge identified here is therefore not the absence of registration at sites where registration is not the relevant function, but the fact that even where registration took place, differentiated approach was not yet implemented fully and consistently.

Access and documentary follow-through not yet fully uniform: Despite the overall high level of access and cooperation recorded through location and facility monitoring, the reports also identify a limited number of recurring access-related constraints. In 5/103 visits, access to all relevant data sources on site was recorded as only partial, and in 1/103 as not enabled, notwithstanding that all such instances were justified and the requested documentation was subsequently provided after the on-site monitoring operation. Likewise, where printouts from the Mol IS were requested, they were only partially provided in 2/69 cases and not provided in 2/69 cases. These findings do not

assessed as non-compliant, were communicated to the Mol through CB's monthly recommendation procedure for follow-up and improvement. In this context, the applicable standards differ depending on the type and purpose of the location/facility, in particular between temporary accommodation in police settings under Article 46(2) and Article 13(2) of the Ordinance on the Treatment of Third-Country Nationals (OG Nos. 136/2021, 145/2023), and longer-term accommodation in reception-type facilities under Article 9 of the Ordinance on Stay in the Reception Centre for Foreigners and the Method of Calculating Forced Return Costs (OG Nos. 145/2021, 155/2022, 137/2023).

point to a general pattern of obstruction. They do, however, show that the practical conditions for full documentary verification were not entirely uniform across all monitored settings.

Operational burdens affecting safeguards in practice: Finally, the location and facility monitoring reports show that police officers themselves repeatedly identified a number of practical constraints affecting the implementation of fundamental rights safeguards in everyday work. The most frequently noted challenge was the language barrier, recorded in 60/103 visits. Cultural barriers and insufficient staffing were each recorded in 31/103 visits. These findings do not describe rights violations as such. They identify recurring operational conditions that can weaken the consistent implementation of safeguards unless addressed institutionally. That reading is reinforced by the recommendation fields in the same monitoring reports: the most frequently proposed improvements were the engagement of more police officers (39), more communication and language specialists (35), and better information and communication equipment (19). In that sense, the reports do not merely identify operational burdens, but also indicate where police officers and monitors themselves saw the most obvious pressure points in everyday implementation.

Overall, the challenges identified through location and facility monitoring do not undermine the broader best-practice pattern established in [Chapter 3.3.1.2](#). They do, however, show that safeguards which are in large part institutionally embedded in practice are not yet fully standardised or equally developed across all location and facility types. The most relevant challenge clusters concern temporary accommodation conditions, the adequacy of accommodation and facilities for children and other vulnerable categories, complaint visibility, health-screening safeguards upon arrival, differentiated profiling during registration, and the recurring operational burdens created by language barriers and staffing limitations.

3.3.2.3. Factoring in Monitors' Annual Reports

Interpretation and communication: Monitors' annual narrative reports confirm the challenges identified through the two structured monitoring instruments, but also add qualitative insight into why certain practical and methodological challenges continued to arise in 2025 despite the overall upgrading of missions and operations. One recurring theme concerns interpretation and communication with migrants. Easier and more reliable access to interpreters, esp. in person and on-site, would significantly strengthen both the interviewing of migrants and the reliability of the information obtained. This is not presented as a challenge to the overall functioning of the monitoring methodology, but as one of the few recurring operational weak points still clearly felt in practice. It also mirrors the challenge police officers themselves repeatedly identified in the structured monitoring reports, namely the continuing practical significance of language barriers in everyday work.

Work with vulnerable persons and specialised support: A second recurring theme concerns work with vulnerable persons and the need for more specialised support. One monitor expressly notes that, given the diversity of migrants' profiles, incl. trauma, mental-health difficulties, previous incidents and other vulnerabilities, at least basic psychological training for monitors would be useful. Another highlights the limited availability of specialist support in the area of mental health, particularly in settings such as Ježevo, where the structure of the migrant population often incl. persons with trauma, psychological difficulties and other vulnerable conditions. These are not presented as findings of unlawful police practice, but as real operational and protective challenges that remain relevant for the quality of safeguards in practice.

Feedback loop on recommendations and follow-up: Finally, the annual reports also identify a challenge that is less about police officers' conduct towards migrants and more about the future implementation of monitoring itself, namely the need to preserve and further strengthen the feedback loop on monitors' monthly recommendations and follow-up requests. One monitor explicitly suggests that, for recommendations recorded in the submitted monitoring reports and transmitted by the IMM CB to the Mol on a monthly basis, there should also be timely and structured feedback on whether and how those recommendations were acted upon. This does not concern the substantive safeguards applied to migrants directly, but it is highly relevant to the sustainability and institutional usefulness of the monitoring model, esp. the IMM CB's monthly recommendation procedure itself ([Chapter 3.6.1.](#)).

Taken together, the monitors' annual narrative reports do not point to a qualitatively different set of challenges than those already identified through the structured findings recorded in the monitoring reports. Rather, they help explain why some of those challenges continue to recur, esp. in relation to interpretation, vulnerability-sensitive support, and the need for a stronger and more traceable feedback loop on the side of the Mol following monitors' improvement-oriented monthly recommendations.

3.3.3. Irregularities in Individual Cases

The IMM in 2025 detected several irregularities in the actions of police officers towards migrants. All 3 cases will be analysed in detail as brief case studies, thereby distinguishing between “event-triggered detection” with information stemming from open/public sources, “monitoring-triggered detection” with information originating from monitoring operations, and “notification-triggered detection” based on information received through IMM's 2025-introduced notification channels (electronic mailbox and the online contact form).

3.3.3.1. Event-Triggered Detection

Based on publicly available information indicating a possible serious irregularity in police conduct, and following an urgent decision of the IMM CB, IMM monitors conducted an extraordinary event-triggered monitoring operation in order to verify allegations of unlawful use of force by police officers and to assess the adequacy of the institutional response. Prior to the extraordinary monitoring visit, police officers informed the migrants about the possibility of speaking to IMM monitors. All persons concerned expressed willingness to do so. The subsequent IMM interview was conducted confidentially, with informed consent and without police presence, in line with the Cooperation Agreement.

The announced extraordinary monitoring mission was carried out within less than 12 hours from the IMM CB's decision to initiate an extraordinary monitoring operation at a (transit) reception centre, where the migrants were accommodated after expressing their intention to seek international protection in the Republic of Croatia. The 2-hour interview was conducted with a present interpreter. According to the interviewed migrants, after being apprehended during police action while on-route towards the Slovenian border, they were removed to another location and subjected to physical ill-treatment by several police officers, despite not offering resistance. The allegations incl. baton strikes and other physical assaults, resulting in visible injuries to two persons. The group further stated that they were subsequently left at another location and later encountered by another police patrol, whose conduct they described as professional. This other police patrol thus initiated investigations into the migrants' physical ill-treatment.

All four migrants were examined by the competent emergency doctor and placed in a (transit) reception centre, after their testimony had been taken by a magistrate judge. The next morning, two of them were referred to additional medical examinations. With regards to injuries the finding was that two migrants had been inflicted light bodily injuries and one of their mobile phones had been destructed.

After the monitors submitted to the IMM CB their report, the follow-up step was aimed at triangulating the interview-based allegations through documentary and institutional sources, incl. medical documentation, case-related police records and information on internal control and prosecutorial action. The IMM CB also requested that the monitors shall be given the opportunity to talk to the police officers who had meanwhile already been suspended due to disciplinary proceedings initiated and a criminal report against them submitted by the criminal police to the competent prosecutor. The police officers charged could not be interviewed by IMM monitors, but through the contact officer of the Mol, the initially requested documentation was provided and contact with the police officer who received the intentions for international protection after the migrants were brought to the police station was enabled. Monitors interviewed the said police officer in order to gather additional information on the police conduct and the case of the above-mentioned migrants.

The additional interview with the police officer who received the migrants' intentions to seek international protection corroborated key elements of the chronology presented by the migrants, in particular the sequence of events after their transfer to the police station, the medical examinations carried out and their accommodation in the (transit) reception centre. The available information about the case indicates that the Mol ICS reacted without delay and initiated proceedings already the next day following the incident. This is a significant element when assessing whether allegations of serious police misconduct are handled expeditiously and in a manner that verification of the events was possible.

At the same time, the case also exposed an important structural limitation from the perspective of independent monitoring: although investigative and disciplinary steps were made promptly, the IMM CB was not proactively and regularly informed of their progress and outcome. The need for repeated follow-up requests limited IMM monitors' ability to assess the effectiveness of the overall institutional response in real time. It was only as late as 16/03/2026, following repeat requests in writing and by phone, that the Mol made available an electronic copy of the Internal Control Service's case files, based on which a more substantial last-minute assessment of the efficiency of the investigation could be prepared by an IMM monitor to be incl. in the 2025 Annual Report ([Chapter 3.4.](#)). According to the information provided by the Mol prior to submission of the case files, the Organized Crime Service completed a criminal investigation of the suspected police officers, and they were handed over to the detention supervisor, with a special report to the Municipal State Attorney's Office. According to the information gathered, the disciplinary procedure was completed and responsibility of the police officers involved in this case was established. Disciplinary sanctions incl. suspended termination of service with probation periods ranging from 6 to 12 months, which sanctions in two cases were combined with financial penalties. However, the criminal proceedings against police officers, at the time of writing this Report, are still ongoing. Also, it is worth noting that the outcome of criminal proceedings is not communicated to the Mol ICS on a regular or systematic basis. Instead, the Mol ICS must obtain such information through targeted checks of criminal records. In practice, this creates an important limitation, as the available capacities of the Mol ICS do not allow for continuous day-to-day tracking of such proceedings. This aspect of the follow-up system should

therefore be improved. According to the latest information available at the time of finalising this Report, the prosecution has not yet indicted the police officers in question nor has it dismissed the charges against them, although more than a year has passed since the incident in question.

This case illustrates the practical relevance of event-triggered monitoring within the IMM mandate. The allegations concerned possible serious unlawful conduct by police officers. The fact that monitors were deployed already the following day significantly strengthened the evidentiary basis of the monitoring report, allowing the IMM to collect first-hand testimonies, verify medical elements and request relevant documentation without delays. The case further demonstrates that the Mol was capable of reacting proactively to establish irregularities, as internal control measures were reportedly initiated promptly and disciplinary responsibility was later established. At the same time, from the perspective of independent monitoring, the case also revealed an important follow-up gap: the IMM CB did not receive timely and regular information on the progress and outcome of proceedings and had to repeat its requests, whereby no access to files about the criminal investigation as conducted by the crime police and/or prosecutorial services was provided. This limited the traceability of the case and supports the need for a more structured framework of feedback in cases of police misconduct and alleged criminal actions, so that the IMM may substantially assess not only whether disciplinary action and criminal prosecution were initiated, but whether these investigations/prosecutions were effective, timely and appropriate.

3.3.3.2. Monitoring-Triggered Detection

During a regular unannounced monitoring operation at a (transit) reception centre, IMM monitors interviewed a migrant who, during the interview, raised matters relevant to the IMM monitoring mandate, namely experiencing obstacles in accessing the procedure for expressing intention to seek international protection at border crossing points. The interview was conducted in English.

The migrant stated that, before being admitted to the procedure in Croatia, she had approached a border crossing point on three occasions together with a travel companion. According to the migrant, on two occasions police officers informed the two of them that no further persons could be processed that day at the border crossing they approached and informed them to return the following day. The migrant described this as a practice of daily access “quotas” to the procedure for expressing the intention to seek international protection. It was only on the third attempt that the migrant was able to express intention to seek international protection at a border crossing point. However, when describing these events, the migrant did not present them as an irregularity or a violation of his rights, but rather as part of the usual procedure. In that sense, the migrant did not express any complaints regarding the conduct of the police officers. The migrant also stated to be suffering from bipolar disorder, which is relevant from the perspective of vulnerability and the need for timely access to the international protection procedure.

In order to assess these statements, monitors relied on several sources: the migrant’s interview and case file review. Given the nature of the statements, the monitor also requested additional information and documentation from the Mol (e.g., Mol information system data, surveillance footage from the border crossing points in question). The documentation submitted by the Mol did not confirm the migrant’s earlier approaches to the border crossing points. However, this absence of confirmation must be interpreted with caution, since the migrant said that these earlier attempts had not been formally registered. In that sense, the lack of documentation on these attempts cannot in itself be taken as disproving migrant’s allegations. From the monitors’ perspective, and

particularly based on a second follow-up interview to collect additional information and evidence, the migrant's statements were assessed as credible and authentic. A potentially important means of further verification would have been CCTV footage from the relevant border crossing points. However, according to the Mol, such recordings are retained only for a limited period of time, and since more than one month had passed between the alleged two attempts to access international protection at the border crossings and the interview with the applicant, this type of verification was no longer available.

In light of the monitors' findings and the need for additional clarification regarding the alleged practice of daily "quotas", the IMM CB decided to conduct a follow-up interview with the migrant. During that additional interview, the migrant provided further details regarding the dates and locations of the attempted approaches to the border crossing points and shared photographs recorded with a mobile phone. According to the migrant, the photographs documented presence near the relevant border crossing points in the early morning hours on the dates of attempted border access. The migrant did not associate the alleged "quota" practice with any requests for money or corruption and stated that she had not heard of police officers taking money in order to facilitate entry.

Following the adoption of the monitors' report, the IMM CB requested a referral of the case to the Mol ICS and a statement from the GPD regarding the alleged irregularity with regards to access to international protection in the specific case and as a possible pattern of irregularities. In its reply, the Mol did not confirm the migrant's allegations of attempted approach to the border crossing points on the dates in question, nor was any refusal of expression of intention to seek international protection recorded for those occasions. The Mol further stated that there is no practice of setting "quotas" limiting the number of persons who may access a border crossing point for the purpose of seeking international protection. According to the statement received, if police officers are engaged in ongoing procedures with other persons, migrants may be instructed to wait until those procedures are completed. It was confirmed by the Mol that the police acted towards the migrant only on the last of the 3 attempts when the migrant approached the entry border control and expressed intention to submit an application for international protection. The migrant was then registered and instructed to report to the (transit) reception centre at the latest within 24 hours, which the migrant eventually did, though according to the Mol with a delay of 36 hours.

The official Mol response, although initially categorically denying any "quota" practices, based on targeted follow-ups by the IMM CB, eventually emphasized that such "quota" practice, if being implemented, has neither been ordered nor that it is compatible with the applicable standards for the treatment of applicants for international protection. Importantly, the final Mol response statement was accompanied by an official written instruction sent to all border police departments drawing attention to the irregularity identified by the IMM and underlining that an intention to seek international protection should be taken as soon as possible after a person approaches the border crossing.

In accordance with the Cooperation Agreement, the IMM CB, through the Mol contact point under the referral procedure, forwarded its report on the irregularity identified in this individual case to the Mol ICS. According to the most recent information received from the Mol ICS, they were aware of the case. However, it had not been formally registered within their case-management framework, which limited their ability to independently verify the conduct in question. This last finding also

contradicts the Mol's prior response statement, which confirmed that the Mol ICS will be notified and the IMM will receive the relevant feedback about the Mol ICS's findings.

The case demonstrates the importance of conducting interviews with migrants during the regular unannounced monitoring missions as a means of identifying potential systematic practices that may otherwise remain undetectable in official records. Even though the allegations of the mentioned practice were not fully confirmed through official records, the case had a clear preventive and corrective value: the issue identified by the IMM triggered a formal written reminder within the police system that such "quota" practice is not permissible and that access to the procedure must be ensured without undue delay. From the monitoring perspective, this illustrates how regular monitoring missions and triangulation of data and sources contribute not only to the identification and investigation of single irregularities, but also to the clarification and reinforcement of lawful conduct and systematic respect for fundamental rights standards. The case, as part of a detected qualitative pattern of irregularities will also be discussed in [Chapter 3.3.4.](#), particularly as the detected "quota" issue at border crossing points in this specific case had also been detected independently during another monitoring mission and by a different monitoring team.

3.3.3.3. Notification-Triggered Detection

The IMM received, via its official IMM online contact form, allegations of serious violations of fundamental rights in relation to a family with children who had allegedly entered the territory of the Republic of Croatia from Bosnia and Herzegovina and sought to express their intention to apply for international protection. The report concerned a family of six, incl. four children.

According to the notification received, the family, while on Croatian territory, asked the third-party for assistance in contacting the police in order to express their intention to seek international protection. Allegedly, after a border police patrol arrived and the family clearly stated their intention to apply for international protection, they were not granted access to the procedure. Instead, they were allegedly transported to a remote area near the border and ordered to return on foot to Bosnia and Herzegovina. The contact form information further alleged police use of force against family members, incl. injury to one child, and stated that medical assistance was not provided despite the reported injury and the presence of a new-born with health problems. The report, in addition to personal data of the family members, contained the alleged registration plates of police vehicles involved.

Upon receipt of the notification, the IMM CB formally requested from the Mol all information necessary to verify the allegations, incl. printouts from the Mol IS for the specified date, data on the movement and location of the police vehicles identified in the report, official notes on police action taken in relation to the family, and information on any internal control or criminal proceedings initiated in connection with the case. Following repeated requests, the Mol subsequently and with major delays provided additional information concerning two of the vehicle registration numbers referred to in the report. According to the information received, one of the vehicles was identified as a vehicle of a specific police station, ordinarily used for the transport of police officers, while the other belonged to a Special and Intervention Police Unit of a specified police administration and was likewise ordinarily used for police transport. According to the vehicle-use records, the police station vehicle had been undergoing repairs during the relevant period and was not in use. The vehicle of the Special and Intervention Police Unit was deployed as reinforcement to the relevant police administration where the incident allegedly occurred on the date in question. However,

according to the MoI information provided, the police officers of that unit did not undertake any actions towards migrants.

This case is of particular relevance to the IMM mandate because it concerns serious allegations regarding the conduct of police officers in the area of border protection and access to the international protection procedure, incl. possible denial of access to asylum, use of force and removal from Croatian territory. The case also illustrates the importance of the IMM's notification-triggered monitoring as part of its broader monitoring architecture. Although the allegations did not arise during a field mission, the IMM CB activated the follow-up and referral mechanisms provided for in the Cooperation Agreement and requested specific information in order to verify information received via its IMM contact form. Access to relevant information, records, files and feedback within a reasonable timeframe is essential for the IMM to verify allegations and assess the adequacy of the institutional response in a meaningful way. Without such cooperation, monitoring is significantly limited, if not completely undermined. In that sense, the case also points to a broader structural issue relevant for the future organisation of the IMM. If the cooperation with the MoI becomes less direct, it will be particularly important to regulate this dimension in a clearer and more structured manner. Future arrangements should define more precisely the scope of the MoI's duty to cooperate, the categories of information that must be provided, the deadlines for responding, the procedure to be followed where no response is received, and the channels through which follow-up is to be ensured. A more structured framework of cooperation is necessary in order to make referral and follow-up procedures operationally effective and to ensure that independent monitoring can fulfil its mandate in practice. At the time of finalising this Report, the MoI has confirmed that no investigation had been launched and hence no case file existed in the MoI ICS regarding this case, although the IMM CB had early on reported the detected irregularity to the MoI ICS via the MoI contact officer.

3.3.4. Qualitative Pattern of Irregularities

The detected qualitative pattern presented in this section must be read carefully from the outset. It is not a broad systematic nor any “statistical pattern” derived from the structured datasets used elsewhere in this Chapter. Nor do the interview and location/facility monitoring reports support any broad operational pattern of core rights-related negative indicators across interviewed migrants and location/facility on-the-spot checks. As already shown in previous chapters, complaints or grievances regarding police officers’ conduct, prior formal complaints, alleged physical injuries, reported use of force or coercive measures, and the 1 monitoring-detected irregularity overall remain concentrated in a very small number of instances rather than being dispersed across the interview and location/facility sample. The present finding is therefore of a different nature: it is a traceable, repeated, case-based qualitative pattern, not a broad statistical or operational pattern within the monitored sample.

Against that background, the information gathered through IMM monitoring operations in 2025 indicates a limited but sufficiently clear qualitative pattern of irregularities regarding delayed access to international protection at certain border crossing points. This assessment does not rest on one isolated instance or one individual operational misunderstanding. Rather, it draws, first, on the monitoring-triggered irregularity described in [Chapter 3.3.3.2](#). Second, it stems from another independently conducted monitoring operation at a different location and date by another monitoring team, whereby neither of the two monitoring teams was aware of the other’s assessment prior to the qualitative pattern being detected as such at the monthly IMM CB meeting. Third, it leans on the subsequent follow-ups conducted by the IMM CB towards the MoI and the GPD, in which the issue was expressly raised not only as an individual irregularity, but also as a possible qualitative pattern of irregularities in police officers’ actions relating to effective access to international protection.

Within the limits of the monitored instances, the converging information demonstrates that in at least a few instances migrants who had presented themselves at a Croatian border crossing point in order to express their intention to seek international protection were not registered immediately by police officers, but were instead informed that no further persons could be processed that day at the border crossing in question and were told either to return the following day, typically in the early morning, or to try at another nearby border crossing. At the same time, and this requires explicit disclosure, the information available to IMM monitors documents that in those few instances police officers appeared to be applying a form of practical triage, prioritising migrant groups perceived as more vulnerable, in particular larger groups and families with children, or those who had simply arrived earlier. The gathered information also documents that said quota- or capacity-based deferment practice, as detected in few instances, was applied in situations and conditions in which there was indeed increased operational pressure at the border crossing due to large numbers of already ongoing migrant registration procedures, which evidenced a shortage in staff to immediately engage with further migrants, whereas the facility conditions at the border crossings themselves were not (fully) appropriate to temporarily accommodate all migrants throughout the very time-intensive processing time.

The information gathered by monitors further suggests that, once the practical registration capacity for the day had been reached at a given border crossing point, information to that effect was in some cases communicated to the corresponding side of the border crossing in Bosnia and Herzegovina, with the result that no further exits towards the Croatian border crossing were allowed that day by police officers on the side of Bosnia and Herzegovina. This aspect is particularly

sensitive and must therefore be read cautiously. The IMM did not establish any formal policy or instruction ordering such practice. However, within the limits of the monitored instances and the follow-up information obtained, monitors documented sufficient indications to assess that the matter could not be treated as one isolated misunderstanding or a one-off operational occurrence.

This understanding is further reinforced by the Mol's own follow-up in response to the CB's prompt flagging of the issue and its request for clarification and urgent action aimed at inhibiting such practices if implemented. In its initial response, the Mol could not confirm the individual migrant's account through official records and stated that there is no practice of setting "quotas" limiting the number of persons who may access a border crossing point for the purpose of seeking international protection. At the same time, however, the subsequent formal response by the GPD expressly emphasised that such a quota-based practice, if being implemented, had neither been ordered nor was it compatible with the applicable standards for the treatment of applicants for international protection. Importantly, said formal response was accompanied by a written instruction sent to all border police departments, constructively drawing attention to the irregularity detected by the IMM and strictly underlining that an intention to seek international protection must be taken as soon as possible after a person approaches the border crossing. This corrective response is relevant in two respects: it confirms the practical seriousness of the issue detected by the IMM, while also evidencing that the GPD acted swiftly and proactively once the issue had been specifically raised and documented.

Notwithstanding the limited number of monitored instances in which a quota-practice was detected, the IMM cannot regard the matter as exhausted at the level of a single instance, which was consequently referred by the IMM CB to the competent national authority (Mol ICS) as a detected irregularity in police officers' conduct for proper investigation. Precisely because the issue was detected independently in more than one monitoring operation and at different dates, locations and by different monitoring teams, the IMM assesses this as a detected qualitative pattern of irregularities. That qualitative pattern, although very limited in numerical scope within the monitored sample, is nevertheless substantively important, since it concerns immediate access to the international protection procedure at border crossings. It should therefore be read not as evidence of a generalised denial of access to international protection, but as evidence that a quota- or capacity-based deferment logic was, in some instances and at certain locations, operationalised in a manner potentially incompatible with the requirement of effective access to international protection.

The issue as detected by the IMM does not seem to be a straightforward rejection of access to the international protection procedure as such, which is also confirmed by the migrants later on gaining access to it. Rather, it concerns the potential incompatibility of such a quota- or capacity-based deferment logic with the requirement that persons who present themselves at a border crossing to seek international protection be processed and registered without undue delay. The available data suggest that these practices were not aimed at definitively rejecting applications for international protection, but only at temporarily postponing the processing of such applications due to limited capacity at certain border crossings. Such practices also encouraged legal border crossings through an informed approach to migrants. Whether or not such deferments by police officers would constitute an undue delay of access to international protection in each single instance and hence an irregularity in police officers' conduct or action beyond the operational meaning of "detected irregularity" under the mandate of the IMM would need to be established by the competent

authorities in each single case. Finally, notwithstanding the Mol’s proactive corrective measure already implemented, the detected qualitative pattern of irregularities warrants continued monitoring follow-ups in order to verify whether the corrective instruction has been fully translated into everyday practice at the relevant border crossing points and beyond.

3.3.5. “Letter of Rights and Complaints” Procedure

In addition to field-based monitoring, 2025 saw the piloting of a complementary safeguard: the IMM’s “Letter of Rights and Complaints” procedure. This instrument operationalises—within a controlled institutional setting—third-country nationals’ right to be informed about their fundamental rights and to lodge complaints about police officers’ actions at the earliest possible stage, i.e., immediately during formal registration by police authorities. While the IMM’s core mandate remains field-based oversight of police officers’ actions, the complaints procedure is designed to cover a structural blind spot inherent to any risk- and mission-based monitoring model: the non-representative sampling and the temporal gap between an alleged incident and its later documentation and investigation.

IMM’s “Letter of Rights and Complaints” informs third-country nationals, in an accessible format, that they have the right to file a complaint if they have been subjected to physical abuse, excessive or unnecessary force, inhuman or degrading treatment, obstruction in accessing international protection, or any other violation of their fundamental rights, and provides practical information on how a complaint may be filed. The “Letter of Rights and Complaints” form itself simultaneously allows for a structured description of the alleged incident, collects follow-up contact data, and foresees institutional follow-up ([Annex 5](#)). It becomes part of the case file and in case a complaint is made the Mol ICS procedure is triggered, with the IMM acting as oversight of the investigation and its outcome. Methodologically, the instrument therefore produces a traceable record that (1) rights-information was provided and a complaint opportunity offered and explained, and (2) the content of any complaint is documented at a location and at a point in time when it can still be investigated and addressed effectively.

From a methodological perspective, the procedure provides three mutually reinforcing functions. First, it creates a traceable opportunity structure for complaints at the place and point of registration, when relevant facts can still be investigated in a timely manner (documentation is accessible; involved officers and shifts can be identified; CCTV footage—if available—may still be secured; witnesses can be questioned; medical and forensic evidence secured). Second, it has a preventive dimension: if the successfully implemented pilot were to be implemented nationwide, it may generate a deterrent effect on unlawful conduct/actions (preventive compliance effect), insofar as police officers are aware that migrants at the point of registration will be explicitly informed about their rights and asked whether they have complaints, while thus being informed about the existence of an independent monitoring mechanism. Third, the procedure is equally in the interest of the Mol, as early detection of complaints enables timely investigations, which may not only lead to investigations and sanctioning where wrongdoing is established, but also allows the Mol as an institution to respond to allegations on the basis of evidence, rather than being confronted with later unspecified claims raised in the media or by CSOs when proper investigation and/or verification is no longer possible.

The Mol voluntarily agreed to pilot IMM’s “Letter of Rights and Complaints” instrument and procedure in a three-month period (October–December 2025) in several most frequently encountered languages and in selected police stations, with the aim of testing a representative procedure that may prospectively be implemented nationwide. Based on the pilot results, IMM’s “Letter of Rights and Complaints” was used in 702 instances in two border police stations, one police station (inner Croatian territory) and a (transit) reception centre. Throughout the pilot period, in all instances forms were marked as having no complaint. While these results require cautious interpretation, the pilot demonstrates the feasibility of institutionalising the procedure and provides a baseline for further refinement. The IMM CB in early 2026 already recommended the Mol to introduce IMM’s “Letter of Rights and Complaints” procedure nationwide, while it reiterates said recommendation in its annual recommendations to the Mol ([Chapter 4](#)).

In IMM’s overall methodological architecture, the “Letter of Rights and Complaints” procedure has been conceived as an additional safeguard axis that would complement risk- and mission-based monitoring. It does not replace on-the-spot oversight; rather, it expands the evidentiary architecture by introducing a structured, early-stage, traceable complaint opportunity—thus covering a ‘blind spot’ that fundamental rights monitoring missions, by their necessarily selective and limited nature, cannot cover comprehensively. If rolled out nationwide, it would provide a systematic source of data on complaints (incl. the absence thereof), which can be triangulated with mission findings and Mol’s internal control outcomes, thereby strengthening both prevention and accountability, while ultimately enabling robust representativeness of IMM’s findings and assessments.

3.4. Referrals and Follow-Ups on Irregularities

The IMM CB, in line with Art. 9 Para. 6 of the Cooperation Agreement, in 2025 referred a total of 3 detected irregularities to the Mol ICS. Of these 3 cases, 1 concerns police misconduct and reported criminal conduct ([Chapter 3.3.3.1.](#)) in relation to which the Mol had, on its own initiative, already launched both a disciplinary investigation and a criminal investigation against the police officers concerned. In that sense, this is not a case of an IMM-initiated investigation as such, but it was nevertheless detected at an early stage by the IMM and monitored accordingly. At the time of finalising this Report, the Mol made available, on 16/03/2026, an electronic copy of basic case file documentation concerning the proceedings before the Mol’s disciplinary court, whereas no access to the crime police and/or prosecutorial criminal case files was possible, although inquired by the IMM CB repeatedly for monitoring purposes. Nor did the electronic copy of the documentation from the disciplinary case file contain all information necessary to enable a full-fledged case analysis by IMM monitors as envisaged in Art. 9 Para. 1 of the Cooperation Agreement. At the same time, the preliminary assessment of the IMM monitor assigned to conduct the available case file analysis notes positively that the disciplinary investigation was initiated promptly and concluded within a reasonable time frame of approx. 4 to 6 months, while also stressing that the documentation provided by the Mol did not allow the monitor to determine with certainty whether the decisions issued by the disciplinary court had become final, or whether appeal proceedings before administrative courts might still be pending.

The remaining 2 cases concern IMM-detected irregularities which the IMM CB promptly referred to the Mol ICS via the Mol’s contact officer. The first of those referrals, concerning the irregularity described in [Chapter 3.3.3.3.](#), was submitted almost a year prior to the finalisation of this Report and incl. both a request for feedback on the investigation and its outcome, as well as a separate formal request to notify the IMM CB of any cases in which police use of force towards migrants was

being investigated by the Mol and/or the Mol ICS, as foreseen in Art. 9 Para. 1 and Art. 9 Para. 6 of the Cooperation Agreement. The same referral was resubmitted one month later, again requesting feedback and prompt notification, on both the referred case as well as with regards any investigations into alleged police officers' unlawful conduct towards migrants. At the time of finalising this Report, no feedback had been provided in response to either request. The only reply received was a significantly delayed response concerning the whereabouts of the 2 identified vehicles related to the case presented in [Chapter 3.3.3.3](#). At the same time, IMM CB's own direct follow-up with the Mol ICS confirmed that no investigation had been requested or initiated following the 2 referrals submitted by the IMM CB. The more recently IMM-detected irregularity ([Chapter 3.3.3.2](#)) was also promptly referred to the Mol ICS through the same procedure. However, at the time of finalising this Report, no feedback had been received as to whether any disciplinary investigation had been initiated. Correspondence on the case, read together with IMM CB's own follow-up with the Mol ICS, indicates that no such investigation had in fact been requested or initiated, notwithstanding that the Mol had earlier announced that the Mol ICS would be notified and that the IMM CB would receive feedback on the findings of that investigation, which might still be forthcoming, or at least should not be ruled out completely at this point.

Read as a whole, these follow-up experiences point to a practical cooperation challenge in one specific and particularly important part of IMM's mandate, namely the referral of detected irregularities aimed at initiating proper investigation by the competent national authorities and the possibility for the IMM monitors to meaningfully assess whether the competent authorities have investigated them expeditiously and appropriately. This challenge should, however, be read in its full institutional context. As [Chapters 1](#) and [2](#) have already explained, the Cooperation Agreement provides the normative anchor and cooperation interface for the IMM, but does not itself prescribe the full operational details of how referral-related follow-up, feedback obligations, response formats or timeframes are to function in practice. At the same time, the sharp increase in IMM operations, referrals, information requests and follow-up activity in 2025, made possible by the IMM's own methodological and operational upgrade, might have created a considerable practical disbalance vis-à-vis the Mol's pre-2025 cooperation capacities, which remained essentially unchanged throughout 2025. In that sense, the challenges identified here could be read in good faith, as an indication that the operational modalities of cooperation in this particularly sensitive area have not yet been sufficiently specified, aligned and capacity-matched.

This does not reduce the importance of the issue. On the contrary, timely notification of relevant investigations, meaningful access to case-related follow-up information, and sufficiently clear channels of communication are essential if the referral component of IMM's mandate is to function as intended. Without such follow-ups, the IMM can refer detected irregularities, but cannot in practice assess whether those referrals resulted in prompt, adequate and accountable institutional action. The challenge identified here therefore concerns less the existence of cooperation as such, and more the need to operationalise that cooperation more clearly and systematically in the future, particularly where referrals relate to irregularities, alleged unlawful conduct by police officers towards migrants and to the use of force. Accordingly, the experiences from 2025 suggest that this aspect of cooperation would benefit from a more proactive and operationally detailed engagement by the Mol in the future design and implementation of monitoring-related follow-up procedures. This concerns, in particular, clearer designation of responsibilities, realistic and mutually understood timeframes for feedback, potentially a higher level of security clearances for designated IMM CB members and monitors with the necessary expertise to conduct this kind monitoring, more

structured notification duties in cases involving police use of force towards migrants, and a more predictable interface between the IMM CB and the MoI. In that sense, the difficulties described above should be understood not only as a challenge, but also as a concrete opportunity for both the MoI and the IMM to further consolidate the cooperative and accountability-oriented dimension of the IMM framework in the period ahead, as well with regards to the future IMM under the Pact.

3.5. Migrants' Health Care and Emergency Medical Services

This section of the Report covers the medical oversight of the exercise of the right to health care, the functioning of the implementation of the legislation regulating that area, and an overview of the health situation of migrants, i.e. foreign nationals who do not hold Croatian citizenship and who enter the Republic of Croatia, at times, irregularly. The opening part sets out the definitions and legal framework, together with the most important provisions of the laws and secondary legislation governing the provision of health care to migrants. It is followed by a more detailed overview of the scope of health care by category of migrant, the costs of providing health care during IMM's current reporting period, and an overview of migrant mortality in Croatia.

3.5.1. Health Care and Documentation

Rights of Persons without Croatian Citizenship and the Legislative Framework for the Provision of Health Care: The right to health care of foreign nationals for whom the Republic of Croatia secures funds in the State budget is exercised pursuant to the Act on Mandatory Health Insurance and Health Care for Foreign Nationals in the Republic of Croatia (Official Gazette Nos. 13/80, 15/18, 26/21 and 46/22; hereinafter: the Act) and the corresponding implementing regulations. The Act regulates mandatory health insurance and health care for foreign nationals in the Republic of Croatia, the scope of rights under mandatory health insurance, the rights and obligations of beneficiaries of mandatory health insurance, the scope of the right to health care and other rights and obligations of foreign nationals under the Act, the conditions and manner of exercising and financing health care for foreign nationals in the Republic of Croatia, as well as the rights and obligations of health-care providers. The regulations that further regulate the standards and scope of the provision of health care to foreign nationals, in particular applicants for international protection and foreign nationals unlawfully staying in the Republic of Croatia, are the Ordinance on the Standards of Health Care for Applicants for International Protection and Foreign Nationals under Temporary Protection (Official Gazette No. 28/20) and the Ordinance on the Manner of Providing Health Care to a Foreign National Unlawfully Staying in the Republic of Croatia (Official Gazette No. 116/18).

In the Republic of Croatia, the area and scope of health care for migrants are regulated by several laws and secondary legislative acts:

- Foreigners Act (Official Gazette Nos. 133/20, 114/22, 151/22 and 40/25)
- Act on International and Temporary Protection (Official Gazette No. 70/15, 127/17, 33/23 and 17/25)
- Act on Mandatory Health Insurance and Health Care for Foreign Nationals in the Republic of Croatia (Official Gazette Nos. 13/80, 15/18, 26/21 and 46/22)
- Ordinance on the Standards of Health Care for Applicants for International Protection and Foreign Nationals under Temporary Protection (Official Gazette No. 28/20)
- Ordinance on the Manner of Providing Health Care to a Foreign National Unlawfully Staying in the Republic of Croatia (Official Gazette No. 116/18).

Rights and Scope of Health Care by Category of Foreign National: The key provisions of the Act, the Ordinance on the Standards of Health Care for Applicants for International Protection and Foreign Nationals under Temporary Protection, and the Ordinance on the Manner of Providing Health Care to a Foreign National Unlawfully Staying in the Republic of Croatia apply to foreign nationals in the Republic of Croatia as follows. Under Art. 19 of the Act, the following categories of persons are entitled to health care at the expense of the State budget (Ministry of Health):

- applicant for international protection;
- asylee;
- foreign national under temporary protection;
- foreign national under subsidiary protection, and family members of an asylee and of a foreign national under subsidiary protection, if mandatory health insurance or health care is not secured on another basis;
- minor foreign national who is a victim of trafficking in human beings; abandoned minor foreign national; minor foreign national who is a victim of organised crime; or a minor who for other reasons remains without parental care, guardianship or accompaniment;
- foreign national staying in the Republic of Croatia at the invitation of its state authorities;
- foreign national suffering from cholera, plague, viral haemorrhagic fevers or typhoid fever; and
- foreign national unlawfully staying in the Republic of Croatia in respect of whom a return-related decision has been adopted.

Applicants for International Protection: An applicant for international protection is entitled to emergency medical assistance and indispensable treatment of illness and serious mental disorders (Art. 20(1) of the Act). A health examination of an applicant for international protection, consisting of a basic medical examination aimed at detecting acute and chronic infectious diseases, must be carried out as soon as possible and within the first five days from the date of arrival at the Reception Centre for Applicants for International Protection/Asylum (Art. 3 of the Ordinance on the Standards of Health Care for Applicants for International Protection and Foreign Nationals under Temporary Protection). An applicant for international protection and a foreign national in need of special reception and/or procedural guarantees, in particular victims of torture, rape or other serious forms of psychological, physical or sexual violence, shall be provided with appropriate health care (Art. 20(3) of the Act).

Scope and Standards of Health Care for Applicants for International Protection: The scope and standards of health care are laid down in Article 6 of the Ordinance on the Standards of Health Care for Applicants for International Protection and Foreign Nationals under Temporary Protection:

1. the right to emergency medical assistance and indispensable treatment of illness and serious mental disorders in accordance with medical indication, incl.:
 - maintenance of vital functions and stopping bleeding;
 - prevention of sudden deterioration of health which could cause permanent damage to individual organs or life functions;
 - treatment of shock;
 - treatment of conditions involving elevated body temperature and prevention of the spread of infection that could lead to sepsis;
 - treatment of poisoning;
 - treatment of injuries and other damage requiring medical assistance;
 - the right to urgent and indispensable dental health care;

- treatment of chronic diseases and conditions the postponement of which would directly or subsequently cause disability, other permanent damage or death;
 - treatment of serious mental disorders;
 - treatment of infectious diseases.
2. the right to medicines from the basic medicines list for emergency medical assistance and indispensable treatment of illness and serious mental disorders in accordance with the medical indication referred to above.

Pursuant to Art. 7 of that Ordinance, urgent and indispensable specialist-consultative and hospital health care, in accordance with a physician's medical indication, is provided in health institutions on the basis of a referral by the competent physician or by emergency medical services.

Foreign Nationals Unlawfully Staying in the Republic of Croatia and the Scope of Health Care: A foreign national unlawfully staying in the Republic of Croatia must undergo a mandatory health examination during the first five days of stay in a reception centre in order to determine health status (Art. 5 of the Ordinance on the Manner of Providing Health Care to a Foreign National Unlawfully Staying in the Republic of Croatia). The medical examination incl. a full-body examination and determination of physical status, together with the physician's recommendations for further urgent and indispensable specialist-consultative examinations on the basis of medical documentation. The established health status is entered into the prescribed form. A copy of the health-status record, together with information on the person's health condition, is delivered to the Reception Centre for Applicants for International Protection if the person concerned has applied for international protection.

A person apprehended while illegally crossing the State border or found to be unlawfully staying on the territory of the Republic of Croatia is, where necessary, provided with emergency and indispensable health care in the nearest health institution and by private-practice health workers within the public health-service network. The costs of health care are borne personally by the foreign national unlawfully staying in the Republic of Croatia, unless those costs cannot be recovered in accordance with the Act, in which case they are paid from the State budget of the Republic of Croatia under the budget line of the ministry responsible for health. Applicants for international protection are ensured daily health care in the reception centre for asylum applicants, provided by a physician or a nurse/medical technician.

Vulnerable Groups: For the purposes of this part of the Report, persons belonging to vulnerable groups incl. persons deprived of legal capacity, children, unaccompanied children, older and infirm persons, seriously ill persons, persons with disabilities, pregnant women, single parents with minor children, persons with mental disorders, and victims of trafficking in human beings, victims of torture, rape or other psychological, physical and sexual violence, such as victims of female genital mutilation. Foreign nationals belonging to a vulnerable group and found in the Republic of Croatia are entitled to appropriate health care as laid down in the Ordinance on the Standards of Health Care for Applicants for International Protection and Foreign Nationals under Temporary Protection (Art. 9 of the Ordinance, Official Gazette No. 28/20). A pregnant woman or woman who has recently given birth is entitled to health care related to pregnancy monitoring and childbirth in the same scope as an insured person under mandatory health insurance. Children up to the age of 18 are ensured the right to full health care in accordance with the rules governing the right to health care under mandatory health insurance.

Health-Care Providers: Each year, the Ministry of Health concludes a contract with Health Centre Zagreb Centar and Health Centre Kutina for the provision of emergency medical assistance services in the Reception Centres for Applicants for International Protection in Zagreb and Kutina. This incl. diagnostic and therapeutic procedures necessary to eliminate an immediate threat to life and health, urgent health care at the level of primary health care, and indispensable specialist-consultative health care, in such a way that one general/family medicine team provides health care every working day. Where emergency dental health care, women’s health care related to pregnancy and childbirth, pre-school children’s health care, medical-biochemical laboratory services or radiological diagnostics are needed, those services are provided through the health centre. Where indispensable specialist-consultative health care is required, an appropriate referral is issued. Necessary medicines are prescribed on special prescriptions in accordance with the said Ordinance.

For better insight into health issues and health-care needs, the system for reporting and monitoring health problems and medical interventions should be unified and improved, and all health-care providers should be required to participate in it. A foreign national found unlawfully staying in the Republic of Croatia is ensured daily health care in a reception centre for foreign nationals, provided by a medical team on the basis of contracts between:

- the Ministry of Health and Health Centre Zagreb County – for the Reception Centre in Ježevo;
- the Ministry of Health and Health Centre Vukovar-srijem County – for the Transit Reception Centre in Tovarnik;
- the Ministry of Health and Health Centre Split-dalmatia County – for the Transit Reception Centre in Trilj.

Specialist-consultative health care, where medically indicated, is provided in health institutions on the basis of a referral by the physician in the reception centre or by emergency medical services. The supply of medicines and medical consumables to foreign nationals in the reception centre is secured by the Ministry of the Interior in accordance with Art. 9 of the Ordinance on the Manner of Providing Health Care to a Foreign National Unlawfully Staying in the Republic of Croatia.

Costs of Health Care for Migrants Covered from the State Budget: The Ministry of Health does not hold data on the total cost of treatment of migrants in the Republic of Croatia, since there is only one budget line in the State budget from which the costs of health care for all categories of foreign nationals under Art. 19 of the Act are paid.

Table 4. Number of Examinations in RCF Ježevo (01/01/2025–31/12/2025)

Type of Examination / Test	Number
Total number of examinations	1.413
Mandatory examinations	731
Preventive examinations	731
Examinations by EMS team	12
Examinations at DZZŽ	1
BAT tests	10
Positive BAT tests	0

* Categories are not mutually exclusive and therefore do not sum to the total number of examinations

Table 5. Number of Examinations in TRC Tovarnik (01/01/2025–31/12/2025)

Type of Examination / Test	Number
Total number of examinations	324

3.5.2. Mortality of Migrants

Table 6 below presents data from the Mortality register of the Republic of Croatia on 26 February 2026, since the data for 2025 are not yet complete. As the register does not contain a “migrant” marker, migrant status was estimated on the basis of the absence of a personal identification number and on the basis of country of origin.

Table 6. Number of Deceased Migrants; Estimate for 2025

Country	Number	Violent death	Other
Afghanistan	1	Drowning	
Ghana	1	Hypothermia	
Eritrea	1		Malignant disease
Syria	2	1 hypothermia + 1 death in fire	
Türkiye	2	1 aircraft crash/fall	1 ischaemic heart disease
China	3	3 drownings	
Unknown	3		
Total	13		

* Data from the Mortality Register of the Republic of Croatia (data for 2025 are not final – processing is ongoing).

** Migrant status is not recorded in the mortality register – it was estimated on the basis of country of residence/origin and available personal data.

3.5.3. Excerpts from Monitors’ Reports on Migrants’ Health and Health Care

At the Reception Centre in Ježevo, an outpatient clinic has been established with two rooms equipped for nurses and physicians. A nurse is present in the clinic on a daily basis, while a physician attends three times a week, performs initial and standard examinations, and keeps the medical documentation. For urgent and additionally required examinations, patients are referred to emergency medical services in Dugo Selo, where they are examined and, where necessary, referred to Clinical Hospital Dubrava.

At the Reception Centre for Applicants for International Protection Porin, health care is available through the contracted health institution Health Centre Dugave, and is also provided by MDM physicians. Where necessary, patients are referred to hospital for specialist examinations. Mandatory initial health examinations are carried out regularly.

At the Transit Reception Centre Tovarnik, there is a well-equipped clinic, and health care is also provided by a contracted primary health-care physician from the primary health-care practice in Tovarnik. A psychologist, social worker and physiotherapist are employed in the Centre.

At the Transit Reception Centre Trilj, health care is organised in the same way, through a contractual arrangement with Health Centre Split-dalmatia County. Initial examinations are carried out regularly.

At the Reception Centre for Applicants for International Protection Kutina, there is a doctor's practice in which a nurse is present. In urgent cases, emergency medical services in Kutina are contacted, and where hospital examination or treatment is required, patients are transported to General Hospital Sisak.

3.5.4. Mental Health, Addictions and Psychosocial Support

The mental-health system for migrants and applicants for international protection is an inter-sectoral model in which public-health, security and social components intersect. The mental-health services of the Croatian Institute of Public Health and of county public-health institutes act as coordinators, while operational implementation falls within the competence of territorially competent health institutions and other sectors. Reception centres are intended for persons in the procedure of seeking international protection and, as a rule, allow a longer stay under a civilian regime. This facilitates continuous work, the development of group and integration-related activities, and more stable monitoring of mental-health needs. In practice, Kutina is more often focused on vulnerable groups, in particular families, women and children, whereas Porin has a greater capacity and a broader structure of beneficiaries. In reception centres, individual interventions, the identification of vulnerable groups, group activities, work with children, and the organisation of access to health services are carried out. Transit centres function under a regime of restricted liberty, with shorter stays and a higher level of acute stress, which makes the implementation of continuous therapy more difficult and increases the logistical complexity of referral into the health-care system. In transit centres, crisis interventions and support as needed are predominant. Under such conditions, the priorities are vulnerability screening, psychological first aid, crisis interventions and rapid medical assessment. Psychosocial workers, medical staff, psychologists and psychiatrists are involved, depending on the location.

As monitors recorded during monitoring operations the need for stronger mental-health care and psychosocial support, it is necessary, together with better coordination of the existing fragmented system described above, to consider the need and possibility for staff and infrastructure strengthening in this area, which requires expert assessment and the preparation of a plan.

Example of Medical Practice in the Field Concerning Mental Health and Addiction Treatment:

At the request of the Mol, a meeting was held on 19 December 2024 in the Service for Reception and Accommodation of Applicants for International Protection with the Addiction Service of the Croatian Institute of Public Health, in relation to resolving problems concerning users' mental health and addictions. It was established that the previous and current year had been record years in terms of the number of persons present in or passing through the centre, and that the return of applicants for international protection on the basis of the Dublin III Regulation takes place in such a way that 60% of returnees have health difficulties, whether psychological or physical, which on reception in the Service require a more significant level of care.

As regards mental-health difficulties, 70 persons in the centre currently had mental-health problems requiring pharmacotherapy, of whom two persons had opiate addiction and were on substitution therapy. A representative of Health Centre Zagreb, the physician at the Service caring for persons in the reception centre, expressed concern because of cases of overdose. In particular, he did not agree with prescribing pregabalin alongside substitution therapy, for fear that persons on substitution therapy would sell that medicine and procure further substitution therapy, thus placing patients at risk of overdose. A representative of the Croatian Institute of Public Health stated that,

in cases of addiction, a psychiatrist, on the basis of assessment of the patient, prescribes the therapy, which is then to be implemented by the primary health-care physician. In prescribing appropriate therapy, the psychiatrist should, inter alia, follow the applicable Guidelines for Psychopharmacotherapy with Methadone and Buprenorphine, which lay down the manner of determining and implementing therapy. In the event of disagreement between physicians, a second specialist opinion may be sought.

For persons with drug-addiction problems, appropriate treatment is secured, incl. psychosocial intervention and pharmacotherapy, as well as other necessary treatment. Health care for these persons is provided on the basis of agreements between the Ministry of Health and health institutions (the Service for Mental Health and Addiction Prevention of the “Andrija Štampar” Teaching Institute of Public Health, Zagreb; the “Sveti Ivan” Psychiatric Clinic, Zagreb; and Vrapče Psychiatric Hospital). Persons granted international protection (asylum or subsidiary protection) are provided with health care in accordance with the Act on Mandatory Health Insurance and Health Care for Foreign Nationals in the Republic of Croatia. Those persons exercise the right to health care on the basis of a certificate issued by the Ministry of the Interior. All such persons have equal access to family physicians as other citizens. Furthermore, Croatia has a specific project, “Disease prevention, psychological support and assistance in the provision of health care for applicants for international protection”, which is implemented in the reception centres in Zagreb and Kutina. A key stakeholder in this project is the association Médecins du Monde (MdM) from Belgium. Within this project, services for the prevention and treatment of drug addiction are provided. Addiction or problematic drug use is identified during the first medical examination, and persons diagnosed with addiction are referred to the competent health institutions, for example the Service for Mental Health and Addiction Prevention of the “Andrija Štampar” Teaching Institute of Public Health in Zagreb. It was also emphasised that representatives of the international organisation MdM, which assists the work of the Service within the framework of a multiannual project, support physicians in their work and do not themselves carry out medical procedures, but act in accordance with the instructions of the primary health-care physician. It was noted that there are cases of manipulation by asylum seekers with the aim of using medical services.

3.5.5. EMS-Interventions Triggered by CSO-Notifications

In the field, it often happens that certain CSOs notify the police and emergency medical services seeking urgent medical assistance for health-endangered migrants, while subsequent medical intervention shows such interventions to have been unnecessary. This creates unnecessary costs and a “psychosis” of migrants’ health endangerment and, after a series of unnecessary interventions, distrust on the part of emergency services as to the seriousness of such calls.

Following one urgent notification concerning endangered health and the need for urgent intervention for migrants, incl. small children, a check of the actual situation in the field was carried out. According to the report of the CB member who conducted the check, on the day in question, the police brought 6 migrants to the emergency medical station in Topusko, incl. two children, one assessed to be around 10 months old and the other around 2 years old. Their age could not be verified because the migrants had no documents and did not speak any widely used language. All migrants were examined and, as no condition or illness requiring intervention was established, they were discharged and handed back to the police who had brought them.

Following the above, all such notifications received by the IMM in 2025 and in January 2026 were independently checked. The notifications often contained geolocation, names and ages of migrants allegedly in need of assistance, together with descriptions of endangerment and a medical condition or presumed diagnosis, most of them serious, ranging from severe exhaustion and injuries to loss of consciousness. The check was carried out through the Croatian Institute of Emergency Medicine database, through contacts with county emergency medical institutes, and through requests to verify intervention records. It was established that in the relevant period 45 notifications with geolocation, names and medical condition were received, out of which in 31 cases (68%) no intervention was recorded, while in 14 cases (31%) an intervention was carried out. In 12 cases, the persons were examined and discharged as healthy or after only a minor intervention, such as treatment of a scratch or the administration of an analgesic, while only in 2 cases (4.4%) was a serious emergency condition recorded and the persons transported to the competent hospital (diabetes with blood glucose 27, and vomiting and dehydration in a child). Of those 45 cases, 25 notifications indicated a life-threatening condition and the need for urgent intervention. In 17 of those instances no EMS intervention was recorded, while in 6 cases (24%) intervention was carried out but the persons were discharged as healthy or after only minimal interventions. In 2 cases (8%), due to the serious condition of the patients, transport to the nearest hospital was carried out (Table 7).

Table 7. Overview of EMS-Interventions Following Notifications Received by the IMM
(2025 and January 2026)

Notifications	Number / Outcome
Total Number of Calls and Notifications	45
No EMS intervention recorded	31 (68%)
Examination carried out – healthy or only minimal intervention	12 (27%)
Transported to hospital	2 (4.4%)
Notifications Explicitly Indicating Life-Threatening Danger	25
Of those: no EMS intervention recorded	17 (68%)
Of those: examined, healthy or minimal intervention	6 (24%)
Of those: transported to hospital	2 (8%)

The average cost of one EMS medical intervention is EUR 125 per patient, and this situation of unnecessary notifications and alerts therefore represents a significant cost for the State budget of the Republic of Croatia. Such situations create unnecessary costs and a “psychosis” of migrants’ health endangerment and, after a series of unnecessary interventions, distrust on the part of emergency services as to the seriousness of such calls. The emergency medical services notification system is, by its nature, urgent, and it is therefore difficult to decide either to ignore notifications or to introduce prior verification of notifications or an additional intermediate step, for example verification by the MoI, which in any event has the best overview of the situation in the field. Nevertheless, the above-described case of manipulation through notifications clearly requires detailed analysis and agreement on how such notifications are to be handled.

3.6. Overall Assessment: Best Practices and Remaining Challenges

In addition to the overall assessment based on the 2025 key findings presented throughout the previous sections ([Chapter 3.6.2.](#)), it is necessary to first briefly address the new 2025 notification channels the IMM has introduced as of 01/2025 via its online contact form and publicly available electronic mailbox, as well as the monthly recommendations procedure through which the IMM CB following each monitoring mission cycle communicates the monitors’ operation-based recommendations to the MoI, since both novelties concern best practices as well as remaining challenges ([Chapter 3.6.1.](#)).

3.6.1. Notification Channels and Monitors’ Monthly Recommendations

IMM’s 2025 Notification Channels: The online contact form on IMM’s website and a publicly available electronic mailbox have been operational throughout 2025. In view of the evidence-based findings this new source of information has produced and drawing from these findings best practices and detected challenges, basic features, facts and figures shall be briefly addressed. Both communication channels ensure that the IMM can be notified directly about potential irregularities in police officers’ actions and alleged infringements of migrants’ fundamental rights. The relevant section of the IMM website also clarifies IMM’s role and mandate to prevent overlaps with the competences of the relevant (inter)national authorities mandated to receive and process complaints.¹¹ It furthermore transparently discloses IMM’s personal data protection policy based on informed consent by those who voluntarily provide their own personal data to the IMM, as well as applicable to third-parties providing personal data of others to the IMM based on their prior informed consent to do so.¹²

¹¹ IMM’s mandate briefly explained with information about competent (inter)national authorities mandated to process complaints: „The IMM welcomes open communication with the interested public and is open to inquiries about its contribution to the respect of fundamental rights by monitoring the actions taken by police officers of the Croatian Ministry of the Interior (MoI) in the area of border surveillance, irregular migration and international protection, with particular emphasis on the respect of the principle of non-refoulement, prohibition of collective expulsion, prohibition of torture and other forms of ill-treatment. [...] For information about the competent Croatian and European authorities empowered to investigate and prosecute or adjudicate individual complaints please see the information provided on the following official websites: [Reporting a crime \(criminal complaint\) to the competent Croatian authorities](#); [Victim and witness support in Croatia](#); [Filing a complaint with the Croatian Ombudswoman](#); [Lodging an application before the European Court of Human Rights](#)“. Cit. <https://www.nmn.hr/contact/32>

¹² IMM’s personal data protection policy: „We thus welcome information about actions taken by police officers of the MoI in the area of border protection, irregular migration and international protection. Such information is taken into account by the IMM in the context of its oversight activities. Although the IMM is a non-prosecutorial and non-judicial oversight mechanism, and as such not empowered to process individual complaints, because it has not been established as a so-called ‘complaint-based mechanism’, the IMM may be required to investigate the submitted information about actions

In 2025 the IMM received more than 80 notifications concerning a total of 38 identified specific instances of potential or alleged infringements of migrants' fundamental rights through police officers' actions or conduct, or the lack thereof. Most of the cases were notified to the IMM via its electronic mailbox (34) compared to its online contact form (4), while all the notified instances together (38) concerned a total of 339 identifiable individual migrants, whereas in some cases (3) the notifications did not provide any information about the migrants that would enable person-counts (e.g., group of persons). The receipt of all notifications by the IMM was consistently confirmed in writing to senders and received notifications were as a rule forwarded within less than 24 hours to the IMM CB, ensuring that the received information is factored into the monitors' FRRA in view of location, timing and target of monitoring missions and operations, and thus, depending on the content and urgency of the notifications, initiating information requests towards the Mol and conducting independent inquiries, as well as targeted monitoring operations.

Compared to third-party submitted notifications (34), only a few cases were notified to the IMM by affected migrants themselves or their family members (4). All these cases (4) were followed up by the IMM. One of these follow-ups resulted in a detected irregularity, which was subsequently referred to the Mol ICS via Mol's contact officer ([Chapter 3.3.3.3.](#)), whereas another led to a targeted monitoring operation (migrant interview), which established the alleged irregularities stemming from a family member's notification to the IMM as false, according to the interviewed migrant's own statement and based on the monitors' assessment which detected no irregularities or fundamental rights violations. The vast majority of notified cases was submitted by third-parties (34), most of them signed as "Solidarityline Croatia" and/or "SLC" (32) and allegedly submitted upon the request of migrants themselves – presumably with their explicit consent to IMM's terms of use of their personal data. The remaining third-party cases were notified to the IMM by another third-party (1) and the Mol (1). The third-party submitted notifications (34) were also as a rule systematically tracked by the IMM, whereby the IMM CB requested from the Mol and subsequently received for all third-party notifications the Mol had received from S.B. (signed as "Solidarityline Croatia" and/or "SLC") in 2025 (39) an analytical report about Mol's responses and conducted police search and rescue operations. The number of notified cases received by the Mol and the IMM stemming from this source does not fully overlap (Mol 39; IMM 32), likely due to the later 2025 inclusion of IMM's electronic address in the respective mailing list which commonly contains some 80 addressees, incl. two dozen Mol addressees, various Croatian state authorities, search and rescue services, Croatian and international CSOs, international bodies such as Frontex, UNHCR, IOM, UNICEF, EC, etc. Mol's report documents that, in response to these notifications, which as a rule incl. explicit search and rescue requests, most of them stating that migrants' lives and/or health are threatened, police search and rescue operations were initiated, incl. emergency medical and/or mountain rescue services when notification-requested or -indicated, targeting the geolocations as reported in said notifications. According to the Mol, out of a total of 449 migrants the 39 notifications referred to, 211 migrants (47%) were not present at the notified geolocations. All other 238 migrants (53%), which the police did encounter at the notified geolocations, had subsequently left Croatia, which in the assessment of the Mol evidences an abuse of the international protection system.

taken by police officers of the Mol using the personal data and statements provided to it. Likewise, in case of IMM's suspicion of irregularities and/or fundamental rights violations, the provided personal data and statements may be used within the scope of IMM's reporting obligations towards the competent state authorities for the purpose of investigating, prosecuting and deciding alleged irregularities and/or fundamental rights violations. By submitting to the IMM your personal data via the contact form and/or IMM's email addresses you consent to the said terms of use of personal data, hence if you are submitting to the IMM personal data of third persons you warrant that they have been informed about the said terms of use of their personal data and provided their consent to them." Cit. <https://www.nmn.hr/contact/32>

In spite of Mol's said assessment concerning the abuse of the international protection system, unwarranted engagement of emergency search and rescue services and largely misleading geolocations, the Mol continues to respond to each such notification by launching police search and rescue operations, as well as emergency medical and/or mountain rescue services when requested or indicated, which must be acknowledged as a consistent indicator of best practice on the side of the Mol, notwithstanding that the large share of unwarranted requests for emergency medical and/or mountain rescue services continues to drain the anyhow limited capacities of such services, as well as police resources, which is a challenge as such that needs to be meaningfully and urgently addressed. The IMM thus independently investigated all and particularly one very alarming such notification with requested urgent emergency medical services intervention due to claimed life-threatening and serious health conditions concerning a group of migrants, incl. vulnerable persons and documented that no medical attention was needed at all, least of all any kind of emergency medical intervention due to a life-threatening or serious health conditions ([Chapter 3.5.5.](#)).

Whether or not and with what exact findings or follow-ups other addressees, besides the Mol and IMM, regularly incl. in the respective mailing list, have investigated or kept track of such type of notified instances remains unknown, nor does there appear to be any systematically analysed and published information by said addressees concerning the notified cases. Likewise, personal data protection standards and duties should be clearly defined and respected in case of third-party submitted notifications containing personal data of migrants, incl. children and vulnerable persons, particularly concerning informed consent to personal data usage policies. Whether or not the persons whose data is being widely circulated, stored, processed and used for unknown purposes, have been properly made aware of this, prior to providing their consent, also remains unknown and should be urgently addressed, ideally in direct consultation between the Mol and the Croatian Personal Data Protection Agency.

Monitors' Monthly Recommendations to the Mol: Another positive development needs to be highlighted, in terms of the 2025 overall assessment of best practices, as well as related challenges. This concerns the monthly recommendations procedure set up by the IMM CB in early 2025 in order to meaningfully bridge the prolonged timespans between IMM monitoring operations' findings and their subsequent transposition into recommendations issued to the Mol via IMM's published annual reports. The monthly recommendation procedure ensures that monitoring findings, esp. detected challenges, are swiftly communicated to the Mol, and that targeted evidence-based monitors' recommendations may be considered and implemented by the Mol as soon as available, rather than only once a year and thus accounting for the time needed to (a) prepare and publish IMM's annual findings and recommendations, and (b) adopt the Mol's Action Plan in response. Said monthly IMM monitor recommendations are thus far more location/facility and case specific, which for the purpose of IMM's annual reports would not be feasible as such. Finally, said IMM monthly recommendation procedure also enables the Mol to address any IMM-detected challenges proactively and in the same self-committed manner in which the IMM-Mol cooperation has been established, rather than having to react post factum after challenges and recommendations have already been published.

The IMM monitorings independently confirmed that the Mol after receipt of IMM's monthly recommendations distributes all of them towards the respective police administrations, requesting both feedback as well as specification of resources and measures needed to implement IMM's monthly recommendations. The Mol, although not obliged to report back to the IMM with regards to

communicated monthly recommendations, has nevertheless in 2025 done so once, which signals Mol's commitment to implement the monthly recommendations, either immediately or prospectively. Said monthly recommendation procedure also compensates for the fact that IMM's prior recommendations, as published in its previous report, were issued with significant delay between conducted monitorings and the publication of said report, which likely resulted in outdating some of IMM's recommendations, whereas others might have been overly generic or not targeting the Mol as addressee due to prior methodological constraints and lacking support capacity on the side of the IMM. Due to this, the Mol's Action Plan, submitted to the IMM in January 2025, remained correspondingly generic and lacked clear indicators and deadlines necessary for the IMM to track and evaluate its implementation, as assigned to a dedicated IMM CB member.

In terms of the 2025 overall assessment of the just presented two methodological and operational IMM novelties and the findings they generated for 2025, both should be regarded as important advances and valuable information sources, but neither is yet fully consolidated. The online contact form and electronic mailbox broadened IMM's evidentiary reach, enabled more structured receipt of case-related and third-party information, and in some instances contributed to timely protective action, incl. follow-ups of cases, as well as targeted monitoring operations and referrals where warranted. At the same time, the experience of 2025 also revealed unresolved issues concerning (a) follow-ups by other addressees who together with the Mol and the IMM receive the same third-party notifications and (b) the proper handling of personal data in such third-party submitted notifications, particularly where awareness, consent and data-protection duties of third-parties towards migrants might not be respected. Similarly, the IMM CB's monthly recommendation procedure significantly increased the timeliness, specificity and practical usefulness of IMM's engagement with the Mol by communicating detected challenges and recommendations without waiting for the annual reporting cycle and by enabling more targeted, location- and case-specific follow-ups and improvements. However, the absence of clearly operationalised Mol feedback obligations towards the IMM and the still limited traceability of what was acted upon in response mean that this procedure, although already valuable, requires further consolidation in order to reach its full potential and to close the feedback-loop towards IMM's monitors.

3.6.2. Best Practices and Remaining Challenges

Concerning identified best practices in 2025, the findings presented in [Chapter 3.3.1](#), point to a predominantly positive and methodologically robust picture. Across migrant interviews, location- and facility-monitorings as well as monitors' annual narrative reports, police officers' conduct towards migrants was in the overwhelming majority of monitored instances substantively assessed as proper, practical safeguards and key procedural guarantees were generally ensured, access to international protection was in the majority of relevant cases communicated and operationalised, and location/facility monitoring confirmed broad access, functioning safeguards and predominantly adequate accommodation-related conditions. This positive picture was further supported by the Mol's clear commitment to the IMM-Mol cooperation throughout 2025, as well as by the piloting of IMM's "Letter of Rights and Complaints" procedure, whose findings independently support the broader assessment that police officers' conduct towards migrants in 2025 has overwhelmingly not given rise to complaints by migrants themselves ([Chapter 3.3.5](#)). These key best practices in 2025 should be preserved and, where possible, further standardised and consolidated.

The remainder of this overall assessment therefore no longer revisits best practices as such, but now focuses on the remaining challenges and detected irregularities that most clearly emerge from [Chapters 3.3.](#), [3.4.](#) and [3.5.](#) For that purpose, the findings are systemised into several substantive clusters corresponding to the internal logic of the annual recommendations ([Chapter 4](#)): access to international protection and immediate procedural safeguards ([Chapter 4.1.](#)); temporary accommodation and vulnerability-responsive practice ([Chapter 4.2.](#)); health care and emergency medical services ([Chapter 4.3.](#)); operational support conditions affecting rights-compliant practice ([Chapter 4.4.](#)); accountability, complaints, notification channels and follow-up obligations ([Chapter 4.5.](#)); and, finally, the need for seamless continuation and further consolidation of external independent monitoring under the Pact ([Chapter 4.6.](#)). Presenting the overall assessment in this way is intended not as a recap of the preceding sections, but as an analytical bridge from the 2025 key findings to the targeted annual recommendations addressed to the Mol.

Access to International Protection, Immediate Procedural Safeguards and Information:

Within the monitored sample, immediate procedural safeguards were ensured in the great majority of cases. The most substantively sensitive remaining issues, however, concern the uniform communication of rights and the practical conditions of access to international protection. The interview-based findings identify a limited number of gaps in information on reasons, rights, legal aid and access-to-procedure guarantees, while the detected qualitative pattern of irregularities concerns delayed access to the procedure at certain border crossing points. That qualitative pattern must not be overread. It is a specific, traceable and repeated case-based detected irregularity, substantively important because it concerns migrants' effective access to international protection at the border and timely registration. At the same time, the broader operational context in which border police officers work remains relevant for the overall assessment.

In line with IMM's core mission of identifying not only instances of shortcomings and irregularities, but also the broader normative, institutional, systematic, operational, technical and human factors that may contribute to them, the relationship between expressed intentions to seek international protection and subsequently submitted requests for international protection helps to illustrate one important structural feature of the relevant context. The data below (Table 8) are therefore incl. and briefly discussed as macro-level contextual evidence relevant for understanding why questions of timely registration, processing capacity and procedural approach remain particularly sensitive and

relevant in everyday border police operations. This is especially so when the discrepancy reflected in the data below is read together with the operational burdens identified elsewhere in this Report, incl. temporary accommodation strain in police facilities, staffing constraints, language barriers, limited cultural mediation, and the broader administrative pressure attached to border procedures.

Table 8. Expressed Intentions and Submitted Requests for International Protection
(2021-2025)¹³

International Protection	2021	2022	2023	2024	2025
Expressed Intentions	3.039	12.872	68.114	26.776	14.928
		+324%	+429%	-61%	-44%
Submitted Requests	2.551	2.727	1.783	1.419	1.236
		+7%	-35%	-20%	-13%
Discrepancy between Expressed Intentions and Submitted Requests	488	10.145	66.331	25.357	13.692
		+1.978%	+554%	-62%	-46%
	16%	79%	97%	95%	92%

The very high shares of expressed intentions to seek international protection which are then not followed through by actually submitted requests for international protection (remaining above 90% throughout the past three years) illustrate the extent to which police officers may in everyday practice perceive the registration and processing of expressed intentions as a resource-intensive and often ultimately inconclusive exercise. The fact that the percentage declines in the discrepancy between expressed intentions and submitted requests in 2024 (-62%) and 2025 (-46%) closely track the corresponding declines in expressed intentions (-61% and -44%), rather than the much smaller declines in submitted requests (-20% and -13%), further suggests that the discrepancy might be driven primarily by the volume of expressed intentions registered, not by subsequent changes in the number of requests actually submitted, thereby highlighting the structural nature of the operational and administrative pressure placed on border police officers.

From the perspective of IMM's mandate, this matters because it makes visible a broader systematic and operational pressure that may contribute to problematic practice unless institutionally addressed. Clearly, this cannot justify any irregularities in police officers' conduct or any restriction of migrants' fundamental rights at the micro-level of individual cases/instances. It does, however, strongly indicate that an adequate institutional response is needed, particularly in relation to human resources, working conditions, interpretation and cultural mediation, communication and documentation support, and other ancillary capacities under which immediate procedural safeguards and access to international protection are expected to function consistently in border police officers' everyday practice.

Taken together, the overall assessment in this cluster is therefore twofold. First, the monitored cases do not support any broader conclusion of generally deficient procedural handling; second, the combination of limited but recurring gaps in information-related guarantees, the detected qualitative pattern regarding delayed access at certain border crossing points, and the broader structural pressure indicated by the macro-level data makes this one of the most important areas for targeted annual recommendations.

¹³ Mol-provided statistical data (12/03/2026).

Temporary Accommodation, Protection-Sensitive Conditions and Vulnerability-Responsive Practice: The strongest location-based challenge identified in 2025 concerns temporary accommodation in police settings. The most recurrent shortcomings relate to insufficient space, inadequate beds, and, in a smaller number of cases, deficient heating/cooling or a lack of structurally suitable rooms for temporary accommodation. This overall assessment must, however, be read with due regard to location type and operational function. The issue is not that all or most monitored police facilities failed to meet basic standards. Rather, the challenge lies in the fact that, across a non-negligible number of relevant locations, temporary accommodation conditions remained uneven and not yet fully standardised in a manner compatible with dignity and basic practical needs. A more mixed, but still important, picture emerges in relation to longer-term accommodation and facilities for children and other vulnerable categories. Reception-type facilities present a more positive overall picture, yet the monitoring findings still identify partial inadequacies where accommodation and facilities should have been more meaningfully adapted to families, children, pregnant women, persons with disabilities and other persons in vulnerable situations. Similarly, where registration took place, differentiated profiling was not yet carried out fully and consistently in every instance, notwithstanding its obvious relevance for identifying legal status, vulnerabilities and procedural needs. The overall assessment in this cluster is therefore not one of general inadequacy, but of uneven protection-sensitive standardisation. Precisely because a large part of the monitored sample showed functioning safeguards, the remaining shortcomings are best understood not as marginal imperfections, but as clearly identifiable areas in which basic conditions and vulnerability-responsive practice still require further improvement.

Migrants' Health Care, Emergency Medical Services and Psychosocial Support: The findings set out in [Chapter 3.5](#) indicate that health care for migrants in Croatia, as relevant for the MoI in the area of border management, rests on a relatively developed legal and institutional framework, incl. access to daily health care in reception-type facilities, emergency medical assistance, indispensable treatment of illness and serious mental disorders, health examinations on arrival, specialist referrals where medically indicated, and dedicated arrangements for vulnerable categories and persons with addictions. At the same time, the findings also show that the practical management of migrants' health needs is becoming increasingly complex, particularly in relation to documentation and continuity of care, mental health, trauma, addictions, psychosocial support, and persons returned under the Dublin system who present more significant physical or psychological health difficulties. This makes it particularly important that migrant health care not be understood narrowly as emergency treatment alone. Rather, the 2025 findings point to the need for a coordinated and well-documented health-care response in which emergency interventions, routine care, specialist referrals, psychosocial support and inter-institutional cooperation function as one continuum. In that regard, the emergency medical service interventions triggered by CSO-notifications are also significant, because they show both the continuing relevance of rapid protective responses once urgent health concerns are communicated to the MoI and the need to meaningfully resolve current tensions between warranted EMS-requests and the "psychosis" of migrants' health endangerment. The overall assessment in this cluster is therefore that the basic legal and institutional framework is in place, but that the practical management of complex health needs, esp. those involving mental health, addiction, psychosocial vulnerability, continuity of treatment and urgent intervention, remains an area requiring sustained attention, better coordination which incl. the MoI, stronger documentation practices and clearer support structures.

Operational Support Conditions for Rights-Compliant Practice: Previously presented findings show that several recurring issues are best understood not as irregularities in police officers' conduct as such, but as operational conditions that directly affect the consistent implementation of safeguards in policing practice. The most clearly documented of these are interpretation and communication difficulties, language and cultural barriers, insufficient staffing, and the continuing relevance of better information and communication equipment. These factors were identified both by monitors and by police officers themselves as recurring sources of strain in everyday work. This matters for the overall assessment because the 2025 monitoring findings do not point to a simple opposition between “best practices” and “remaining challenges.” A significant part of the remaining challenge lies in the fact that rights-compliant practice in this field is often operationally demanding, time-consuming and heavily dependent on support capacities outside the immediate control of individual police officers. The same logic applies to the question of body cams and related equipment: where safeguards depend on reliable documentation, communication and traceable police procedure, the adequacy of operational support conditions becomes directly relevant to the consistency of rights protection. The overall assessment in this cluster is therefore that a number of recurring shortcomings would be more effectively addressed not only through normative reminders, but through stronger operational support conditions enabling police officers to implement safeguards more consistently and under less strain.

Accountability, Complaints, Notification Channels and Follow-Up Obligations: The findings of 2025 point to a broadly positive picture in relation to cooperation and access, but also to a more sensitive and less consolidated accountability dimension. Complaint-related information was not displayed uniformly across all monitoring location/facility checks. The 2025 notification channel established through IMM's online contact form and electronic mailbox constituted a meaningful advance, yet its use also exposed unresolved questions concerning third-party notifications, personal-data handling and the extent to which other addressees besides the MoI and IMM systematically investigate, track or publicly report on such notifications. At the same time, the experience of 2025 showed that the IMM CB's monthly recommendation procedure significantly strengthened the timeliness and specificity of follow-up, but still lacks sufficiently clear reciprocal MoI feedback. That broader accountability picture is reinforced by [Chapter 3.4](#). Although the MoI-IMM cooperation in the field remained broadly strong, access to complaint-related files and timely follow-up information in a small number of serious cases remained insufficiently structured for the purposes of independent monitoring. The issue is therefore not a general absence of cooperation, but the fact that in one particularly sensitive part of IMM's mandate concerning referrals of detected irregularities and the monitoring of their follow-up channels of notification, feedback and access are not yet sufficiently operationalised and capacity-matched. The overall assessment in this cluster is thus that 2025 produced important advances in preventive and accountability-oriented practice, but also showed that complaint visibility, notification channels, data-protection standards, follow-up duties and documentary access require clearer operationalisation if the accountability dimension of an independent monitoring framework is to function with full effectiveness.

Seamless Continuation and Further Consolidation of Monitoring: Finally, the overall assessment of 2025 also points to one conclusion of a more structural kind. The value of the 2025 monitoring cycle did not lie only in the significantly increased number of unannounced missions and operations conducted, but in the combination of increased field presence with standardised instruments, multilayer verification, traceable reporting, broader access to information, systematic migrant interviews, green border monitorings, the new notification channels, and the monthly recommendation procedure. In other words, 2025 showed not merely that the IMM was more active, but that it had become more methodologically coherent and operationally capable, which ultimately has created a much more robust, diverse and sensible evidentiary basis, enabling both to draw valuable and new findings as well as issue more targeted and evaluable annual recommendations. This is extremely relevant because the monitoring-gains achieved in 2025 are not self-sustaining. They depend on the continued existence of an institutional and operational framework capable of preserving the pace, scope and methodological depth of monitoring, while further improving those areas in which the 2025 findings identified remaining challenges. The overall assessment therefore points beyond the isolated question of whether the IMM should continue in formal terms. It concerns the need to preserve and further consolidate a matured monitoring model, to be implemented under the Pact, that has in 2025 demonstrably become more efficient, more evidence-based, more traceable and more useful both for identifying challenges and for supporting targeted institutional improvement.

4. ANNUAL RECOMMENDATIONS

The following chapters set out IMM's annual recommendations on the basis of the findings, assessments and overall assessments presented in the previous chapters. They are therefore not a separate policy exercise detached from the evidence base presented in the Report. Rather, they translate into targeted recommendations the empirical findings, evidentiary conditions, detected best practices, identified challenges, detected individual irregularities and the limited qualitative pattern of irregularities analysed in [Chapter 3](#) and understood against the background of [Chapters 1](#) and [2](#). The purpose of the chapter at hand is to identify, on that basis, what should be preserved where safeguards and practices function well and what should be strengthened where challenges or irregularities have been detected. Each recommendation chapter therefore responds to a clearly identified cluster of findings and should be read as part of one coherent, preventive and improvement-oriented expert dialogue between the IMM and the Mol, aimed at strengthening the protection of migrants' fundamental rights in the field of border management, irregular migration and international protection.

One of the clearest lessons of 2025 is that meaningful follow-up depends on commitment, dialogue and specificity on both sides. IMM's annual recommendations must be sufficiently evidence-based and targeted to be operationally useful for the Mol, while the Mol's Action Plan must be sufficiently concrete to enable meaningful implementation tracking and continuous evaluation. The earlier monitoring and cooperation cycle might not have provided a sufficiently structured basis for that. IMM's recommendations were delayed and may have occasionally remained somewhat generic, and as a consequence Mol's Action Plan remained correspondingly unspecific and not meaningfully evaluable, while concentrated dialogue on implementation needs, practical constraints, workable solutions and trackable indicators was lacking. The result was a process that remained largely reactive and sequential, rather than genuinely consultative and proactively improvement-oriented.

Two examples of best practice from 2025 clearly demonstrate how and why truly impactful external monitoring needs to be designed and practised in a constructive consultative manner. The first relates to the Mol's upscaled monthly information package, which is one of IMM's key sources for the monitors' FRRRA and risk-based monitoring sampling. The issue was addressed in open dialogue early in 2025 due to the common delays and missing data in the previous reporting period. Experts from Mol's analytical sector were directly involved and, as a result, the monthly statistics were subsequently delivered far timelier, incl. all mandatory indicators, were aggregated in a considerably more user-friendly manner, contained new indicators and were complemented by Mol's basic risk parameters for the forthcoming period. Likewise, the initial idea for the successfully piloted and now to be nation-wide implemented "Letter of Rights and Complaints" procedure traces back to a frank discussion held in mid-January 2025 in a border police station with an expert Mol representative, border police officers and the Head of the IMM CB, while the final output is the result of continuous consultations and dialogue, incl. the GPD, the Mol's ICS, as well as experts from European bodies with hands-on experience in fundamental rights monitoring. In both cases, the decisive element was an open dialogue between the IMM and the Mol, incl. its topical experts and border police officers. This enabled not only full clarification of the issues in question on both sides, but, on the basis of a shared understanding of all relevant aspects, also the development of meaningful and workable solutions, beneficial not only for both the IMM and the Mol, but more importantly, thereby effectively contributing to the protection of migrants' fundamental rights, either directly as with IMM's "Letter of Rights and Complaints" procedure, or indirectly through the monitors' FRRRA.

These two examples also show what a more mature and meaningful follow-up model should look like. IMM identifies and evidences relevant issues through monitoring and distils them into targeted annual recommendations. The AB IMM contributes its own recommendations. Those inputs should then be discussed with the MoI within the cooperation framework itself, in particular through the Workshop on the results of the monitoring mechanism and border control activities foreseen in Art. 8 of the Cooperation Agreement. That workshop-dialogue should serve as the key forum for bringing together IMM findings and recommendations, the AB IMM input, and the practical experience of police officers and monitors in order to discuss operational realities, implementation constraints, workable solutions, measurable indicators and realistic timeframes. The key conclusions of that dialogue should then provide the basis for MoI's Action Plan. In line with this, the recommendations set out below are intended to remain targeted, evidence-based and operationally meaningful, but they do not seek to prescribe in detail implementation mechanics, micro-measures or fixed deadlines unilaterally through the Report itself. Instead, they identify clearly what needs to be addressed, while measurable indicators, feasible implementation solutions and realistic timelines need to be discussed, adopted and, where necessary, revised through the workshop process and then reflected in MoI's Action Plan. In the context of IMM's mission and mandate, this is the only meaningful approach.

Finally, in formulating the annual recommendations, the IMM also factored in, as applicable, the relevant domestic, European and international standards and guidance which inform the protection of migrants' fundamental rights in the area of border management, irregular migration and international protection. These standards and guidance were not only relevant across IMM's monitoring missions and operations and the monitors' findings and assessments, but are perhaps even more important in the formulation of IMM's annual recommendations. They are not limited to, but incl., in particular, the most recently available Ombudswoman's Report and recommendations for 2024, CPT reports and standards, relevant FRA guidance and publications, the SPT report on Croatia, as well as the 2025 Recommendations of the AB IMM ([Annex 6](#)). The annual recommendations should therefore be understood not only as a direct continuation of IMM's 2025 evidence base, but also as recommendations formulated against the background of the most relevant fundamental rights standards and available expert guidance currently applicable in this field.

4.1. Access to International Protection, Immediate Procedural Safeguards and Information

The Mol should:

- (1) Ensure that every person who presents themselves at a border crossing point and expresses the intention to seek international protection is received, registered and channelled into the relevant procedure without undue delay, and that no quota-, capacity- or workload-based practice is tolerated where it may lead to unduly delayed access to the procedure.
- (2) Ensure that immediate safeguards are operational from the very outset of police procedure, in particular information on reasons for police action, rights, access to international protection, legal aid where relevant, notification of third parties and, where applicable, consular authorities, access to interpretation, and access to healthcare where needed.
- (3) Ensure that interpretation is promptly and reliably available wherever the communication of rights, the expression of an intention to seek international protection, registration, or any other rights-relevant police action depends on actual comprehension, and that no person is asked to sign documents they do not understand.
- (4) Ensure that the communication of rights and access-to-procedure safeguards are documented in a systematic and traceable manner, especially in situations involving deprivation of liberty, anti-smuggling operations, heightened stress, or persons in vulnerable situations.
- (5) Preserve and further standardise the positive 2025 practice that police officers are clearly identifiable and that basic immediate safeguards, incl. access to water, food, toilets and healthcare where needed, are ensured from the outset of police procedure.
- (6) Address, through Mol's Action Plan and the workshop process, the structural and operational pressures affecting timely and rights-compliant police procedure at the border, in particular where high numbers of expressed intentions are not followed by submitted requests and where this generates disproportionate administrative and operational burdens on frontline police work. This recommendation directly reflects the Report's finding that immediate safeguards were mostly ensured, while the most substantively sensitive remaining issues concern the practical conditions of access to international protection, uniform communication of rights, and the detected qualitative pattern concerning delayed access at certain border crossing points.

4.2. Temporary Accommodation, Protection-Sensitive Conditions and Vulnerability-Responsive Practice

The Mol should:

- (7) Ensure that temporary accommodation in police settings fully complies with the applicable standards at all relevant locations, with priority given to facilities where monitoring identified insufficient space, unsuitable rooms, inadequate beds, inadequate heating or cooling, lack of privacy, insufficient sanitation, or other conditions incompatible with dignified temporary accommodation.
- (8) Prevent the use of improvised, office-type or otherwise unsuitable premises for the temporary accommodation or temporary holding of migrants, especially where such premises do not allow for privacy, rest, sanitation, appropriate separation or accessibility.
- (9) Ensure that children, families, pregnant women, persons with disabilities and other persons in vulnerable situations are accommodated and treated in conditions adapted to their needs, and that deprivation of liberty or other restrictive measures affecting such groups are avoided wherever possible and, where exceptionally unavoidable, remain as short as possible and clearly administrative in character.
- (10) Ensure that profiling and differentiated approach are carried out consistently wherever registration takes place, so that legal status, vulnerabilities, family situation, protection needs and other safeguard-relevant circumstances are identified early and meaningfully reflected in subsequent procedural and accommodation decisions.
- (11) Preserve and standardise the positive accommodation-related practices already identified in better-functioning reception-type and registration settings, so that those standards are not limited to certain sites but applied more uniformly across the system.

4.3. Health Care, Emergency Medical Services and Psychosocial Support

Within its own competence and in close cooperation with the competent health authorities and other relevant actors, the MoI should:

- (12) Ensure that migrants' access to healthcare is treated as a continuous safeguards issue and not reduced to emergency intervention alone, incl. through timely health assessments, continuity of care, adequate documentation and clear referral pathways.
- (13) Ensure that health screening on arrival and at the earliest relevant stage of accommodation or deprivation of liberty is timely, properly documented, and capable of identifying urgent health needs, vulnerabilities, trauma indicators, mental-health concerns and situations requiring specialist follow-up.
- (14) Strengthen the practical response to complex health needs, in particular those involving mental health, trauma, addiction, psychosocial vulnerability and persons returned under the Dublin system who present significant physical or psychological difficulties.
- (15) Ensure that emergency medical services are requested without delay whenever urgent health concerns arise and that no practical, organisational or attitudinal barrier discourages police officers from requesting emergency intervention where warranted.
- (16) In cooperation with the competent actors, meaningfully address the tensions identified through the 2025 notification experience between warranted requests for emergency intervention and repeated notifications that necessitated no intervention or only minimal treatment, so that urgent health concerns are neither trivialised nor instrumentalised and emergency resources remain credible and responsive.
- (17) Ensure that medical confidentiality is fully respected and that interpretation for health-related communication is professional, reliable and never left to other migrants in situations in which confidentiality, accuracy or vulnerability are at stake.

4.4. Operational Support Conditions for Rights-Compliant Practice

The MoI should:

- (18)** Address staffing levels as a matter directly relevant to the protection of fundamental rights, particularly in those areas of everyday work in which police officers are expected simultaneously to conduct border procedures, registration, temporary accommodation-related tasks, documentation and protection-sensitive decision-making.
- (19)** Substantially strengthen interpretation and cultural mediation capacity, incl. through more reliable access to interpreters, communication specialists and other practical language-support arrangements capable of functioning in everyday field conditions.
- (20)** Continue to improve working conditions and material rights of police officers in a manner that supports professional, rights-compliant and sustainable practice, especially in demanding border, reception and anti-smuggling contexts.
- (21)** Ensure that staff working with migrants possess and further develop the communication, interpersonal and cultural-sensitivity skills necessary for rights-compliant practice, incl. the ability to recognise distress, vulnerability, trafficking indicators, gender-based violence indicators, and possible physical or mental-health deterioration.
- (22)** Improve communication and information equipment in those settings where lack of adequate equipment directly weakens the consistent implementation of safeguards, efficient documentation or communication with migrants.
- (23)** Further assess and, where appropriate, develop technical tools that may strengthen traceability and reduce avoidable administrative burden, while ensuring data protection, human oversight and accountability.

4.5. Accountability, Complaints, Notification Channels and Follow-Up Obligations

The Mol should:

- (24) Swiftly implement nationwide the “Letter of Rights and Complaints” procedure and ensure that it is accompanied by an integrated reporting and notification mechanism enabling real-time or near-real-time external independent monitoring.
- (25) Ensure that information on complaints procedures is communicated orally and in writing where relevant, visibly displayed in all applicable facilities, and made available in languages commonly understood by migrants, in a manner that makes direct and confidential complaint submission practically possible.
- (26) Establish a clear, central and traceable system for recording, analysing and following up complaint-related information, incl. information generated through the “Letter of Rights and Complaints” procedure, so that complaints function not only as an individual safeguard but also as an accountability and early-warning tool.
- (27) More clearly operationalise Mol’s notification, feedback and follow-up obligations vis-à-vis the IMM, especially in relation to monitors’ monthly recommendations, referred irregularities, cases of alleged unlawful use of police force, documentary follow-up and information necessary for monitoring whether corrective steps were actually taken.
- (28) Ensure more reliable and timely documentary access in cases involving alleged misconduct, internal checks, complaint-related files, disciplinary or criminal follow-up, and other investigation-linked materials relevant to the IMM’s mandate.
- (29) Clarify, in cooperation with the competent national authorities, particularly the Personal Data Protection Agency, the handling of third-party notifications submitted to the Mol as well as through the IMM’s online contact form and electronic mailbox, incl. the proper treatment of personal data, awareness and consent issues by the notification-submitting third-parties, and the obligations of other addressees who receive the same notifications together with the Mol and the IMM.

4.6. Seamless Continuation and Further Consolidation of Independent Monitoring

The Mol should:

- (30)** Support the seamless continuation of independent external monitoring at least at the pace, scope and methodological depth achieved in 2025 and maintained in 01/2026–07/2026 and as to be set up under the Pact within the Government’s Office for Human Rights and Rights of National Minorities, incl. in the event that the current IMM operational framework under the Cooperation Agreement ceases its operations prior to the IMM under the Pact becoming operational, so that monitoring is continued irrespective of normative or practical delays in implementing the Pact.
- (31)** Preserve as core elements of any future monitoring framework the features that made the 2025 cycle substantively valuable: regular field presence, broad geographical coverage, standardised monitoring tools, multilayer verification, traceable reporting, interviews with migrants, green border monitoring and structured follow-up.
- (32)** Actively participate in the drafting of the future legal and institutional framework for the IMM under the Pact, incl. by engaging substantively with the Government Office for Human Rights and Rights of National Minorities during the drafting process and by providing a clear written opinion before the relevant legal and institutional framework is adopted by the Government.
- (33)** Use that participation to ensure that the future framework transposes the best practices and lessons learned from the 2025 Mol-IMM cooperation, remains workable in operational terms, preserves meaningful external independence, and avoids repeating earlier structural weaknesses or overly generic cooperation design.
- (34)** Ensure that any future external monitoring framework contains sufficiently clear rules on access, cooperation, security clearance, information flows, data protection, notification duties, documentary follow-up, referrals, feedback obligations and practical support capacities on the Mol’s side.
- (35)** Support the continuation of the consultative model consolidated in 2025, in which findings and recommendations are discussed within a cooperative framework and translated into concrete action plans through meaningful dialogue rather than through reactive, sequential and overly generic implementation cycles.

ANNEX 1.

Cooperation Agreement – Consolidated Text (29/04/2025)

The Coordination Board of the Independent Monitoring Mechanism (hereinafter: IMM) at its 16th meeting held on 29 April 2025, pursuant to Article 3, Paragraph 1 of the Cooperation Agreement for the Implementation of the Independent Monitoring Mechanism for the Protection of Fundamental Rights in the Actions of Police Officers of the Ministry of the Interior in the Area of Border Protection, Illegal Migration and International Protection of 4 November 2022 (hereinafter: Agreement), the Annex to the Agreement of 26 May 2023 (hereinafter: Annex) and the Second Annex to the Agreement of 25 April 2025 (hereinafter: Second Annex), decided to adopt a consolidated text of the Agreement. The consolidated text includes the Agreement, the Annex and the Second Annex (hereinafter: Consolidated Text of the Agreement) and is published on the website of the IMM based on the above-mentioned decision.

CONSOLIDATED TEXT OF THE COOPERATION AGREEMENT

FOR THE IMPLEMENTATION OF THE INDEPENDENT MONITORING MECHANISM FOR THE PROTECTION OF FUNDAMENTAL RIGHTS IN THE ACTIONS OF POLICE OFFICERS OF THE MINISTRY OF THE INTERIOR IN THE AREA OF BORDER PROTECTION, ILLEGAL MIGRATION AND INTERNATIONAL PROTECTION



MINISTRY OF THE INTERIOR OF THE REPUBLIC OF CROATIA, Ulica grada Vukovara 33, Zagreb, Personal Identification Number: 36162371878;

and

Association of CROATIAN ACADEMY OF MEDICAL SCIENCES, Praška 2/III, 10000 Zagreb, Personal Identification Number: 22710084385 (hereinafter: CAMS);

Association of CROATIAN ACADEMY OF LEGAL SCIENCES, Trg Republike Hrvatske 14, 10000 Zagreb, Personal Identification Number: 08712093968 (hereinafter: CALS);

Association of CENTRE FOR CULTURAL DIALOGUE, Prilaz Safvet-bega Bašagića 1, 10000 Zagreb, Personal Identification Number: 97119804777 (hereinafter: CCD);

Association CENTRE FOR BALKAN CRIMINOLOGY AND SECURITY, Trg Republike Hrvatske 3, 10000 Zagreb, Personal Identification Number: 64054920029 (hereinafter: Centre for Criminology);

Association of CROATIAN RED CROSS, Ulica Crvenog križa 14, 10001 Zagreb, Personal Identification Number: 72527253659 (hereinafter: CRC);

Prof. Dr. Iris Goldner Lang, Vončinina ulica 11, 10000 Zagreb, Personal Identification Number: 07005111410;

pursuant to Article 5, Paragraph 7 of the State Border Surveillance Act (Official Gazette 83/13, 27/16, 114/22, 151/22) on 4 November 2022 concluded the following

COOPERATION AGREEMENT FOR THE IMPLEMENTATION OF THE INDEPENDENT MONITORING MECHANISM FOR THE PROTECTION OF FUNDAMENTAL RIGHTS IN THE ACTIONS OF POLICE OFFICERS OF THE MINISTRY OF THE INTERIOR IN THE AREA OF BORDER PROTECTION, ILLEGAL MIGRATION AND INTERNATIONAL PROTECTION

**Article 1
PURPOSE**

The Agreement governs the work of the Independent Monitoring Mechanism, whose objective is to contribute to the respect of fundamental rights by monitoring the actions of police officers of the Ministry of the Interior, in the area of border protection, illegal migration and international protection, with special emphasis on the respect of the principle of non-refoulement, prohibition of collective expulsion, prohibition of torture or other forms of ill-treatment.

**Article 2
DEFINITIONS**

For the purposes of this Agreement, the following definitions shall apply:

(a) “irregular migrant” refers to a third-country national or stateless person who has crossed or attempted to cross the state border of the Republic of Croatia outside a border crossing point or across a border crossing point outside operating hours, i.e., who circumvents a border control or leaves the area of a border crossing point prior to the border control having been carried out.

(b) “applicant for international protection” means a third-country national or stateless person who declares their intention to apply for international protection until the decision on the application becomes enforceable.

(c) “green border” refers to the external border of the Republic of Croatia with Bosnia and Herzegovina, Montenegro, and the Republic of Serbia.

(d) “announced monitorings” mean monitorings based on a previous written notification.

(e) “unannounced monitorings” mean monitorings which are carried out with a prior oral notification and the arrival of monitors at the police station with jurisdiction over the section of the green border covered by the monitoring with the sole aim of ensuring the monitors’ safety. The police station is obliged to provide monitors with unhindered access to all tasks of state border protection.

(f) “restricted areas” mean mine-suspected areas, forest and mountain areas difficult to access at the green border, border crossing points, police stations, police administrations in the Republic of Croatia on the border with Bosnia and Herzegovina, Montenegro and the Republic of Serbia.

(g) “Coordination Board” is comprised of one representative per civil society organisation, signatory to this Agreement, and Prof. Dr. Iris Goldner Lang.

(h) “monitors” mean direct implementers of oversight activities.

Article 3 COORDINATION BOARD

The Coordination Board professionally directs and manages the activities of the Independent Monitoring Mechanism, prepares periodic reports on its work for the Advisory Board and the Ministry of the Interior, a recommendation for the implementation of national monitoring mechanisms in accordance with the provisions of the Pact on Migration and Asylum for the Ministry of the Interior, an annual report on the actions of police officers of the Ministry of the Interior in the area of border protection, illegal migration and international protection, with special emphasis on the respect of fundamental rights, the principle of non-refoulement, the prohibition of collective expulsion, the prohibition of torture or other forms of ill-treatment on the basis of the monitors’ individual reports and performs other tasks regarding the management of the Independent Monitoring Mechanism.

The Coordination Board is comprised of one representative per civil society organisation, signatory to this Agreement, who are nominated within 15 days after signature of this Agreement and Prof. Dr. Iris Goldner Lang.

The Coordination Board shall appoint associates of the Independent Monitoring Mechanism to perform administrative, professional, logistical, financial and other support tasks to ensure the implementation of the activities of the Independent Monitoring Mechanism. The obligation to comply with the regulations on personal data protection and data confidentiality, as well as the obligation to keep all information made available to them for the purpose of performing tasks to support the implementation of the Mechanism, shall apply accordingly to the associates of the Independent Monitoring Mechanism who perform administrative, professional, logistical, financial and other support tasks.

The Coordination Board shall meet at least once a month.

The Head of the Coordination Board, its Deputy and the Secretary are elected by the members of the Coordination Board between themselves by a majority of votes.

The Head of the Coordination Board shall present and represent the Coordination Board, coordinate the Independent Monitoring Mechanism's activities, convene the meetings of the Coordination Board and, based on the periodic work reports, presents the Independent Monitoring Mechanism's activities to the Advisory Board as an informal body and to the Ministry of the Interior. A summary of the periodic reports on the work of the Independent Monitoring Mechanism may be published on the website of the Independent Monitoring Mechanism with the prior consent of the Ministry of the Interior.

In case of the Head being unavailable, he shall be replaced by the Deputy Head.

The Secretary of the Coordination Board shall perform administrative tasks related to the organization of the Coordination Board's meetings.

The Coordination Board shall prepare an annual report based on individual monitors' reports. The annual report shall be prepared within 3 months and shall cover all activities of the Independent Monitoring Mechanism in the immediately preceding calendar year.

The Coordination Board shall establish a website of the Independent Monitoring Mechanism on which all relevant information related to the implementation of the Mechanism (in Croatian and English language) and an (electronic) mailbox shall be available, thereby ensuring open communication with the interested public.

The annual report shall be published on the website of the Independent Monitoring Mechanism and on the websites of the civil society organizations signatories to this Agreement. Prior to the public publication of the annual report, the Ministry of the Interior's response to the annual report shall be obtained regarding possible factual errors or procedural irregularities, the acceptance of which shall be decided by the Coordination Board, whereby in the event of non-acceptance of the response, this may be published as an annex to the annual report.

The Ministry of the Interior is obliged to prepare an Action Plan for the implementation of the recommendations entailed in the published annual report of the Coordination Board within 30 days from the date of its publication.

The Coordination Board regularly monitors the implementation of the recommendations from the Action Plan and for this purpose may request clarifications or individual reports on their implementation from the Ministry of the Interior.

The Action Plan for the implementation of the recommendations of the Ministry of the Interior shall not be made public.

Article 4

MONITORS OF THE INDEPENDENT MONITORING MECHANISM

Two monitors per civil society organisation, signatory to this Agreement, shall be nominated by the Coordination Board within 15 days after signature of this Agreement.

In the implementation of activities, monitors must comply with relevant domestic and EU law as well as European Union acquis.

When necessary, the monitors may participate in the meetings of the Coordination Board.

Article 5

ROLE OF THE MINISTRY OF THE INTERIOR

The Ministry of the Interior shall provide its support to the Independent Monitoring Mechanism by appointing a contact officer within 15 days after signature of this Agreement in order to ensure smooth and timely exchange of information and performance of other tasks enabling the implementation of Independent Monitoring Mechanism's activities.

By the 10th day of the month, the contact officer of the Ministry of the Interior shall deliver statistical reports to the monitors for the previous month containing information on all irregular migrants and applicants for international protection, on migration trends at the Croatian external border, including basic risk assessment parameters for the forthcoming month, registered intentions of international protection applications, illegal entry, movement and stay in the territory of Croatia as well as cases of migrant smuggling.

Article 6

LOCATIONS OF IMPLEMENTATION OF THE INDEPENDENT MONITORING MECHANISM'S ACTIVITIES

The Independent Monitoring Mechanism's activities shall be implemented at the external border, including the green border, at border crossing points / in police stations / police administrations of the Republic of Croatia with Bosnia and Herzegovina, Montenegro and the Republic of Serbia as well as in reception centres and reception centres for foreigners.

Article 7

POLICE ACTIONS MONITORING

Monitors shall conduct at least 20 monitorings in a year.

Based on the received statistical reports referred to in Article 5 and pursuant to previously established criteria, the monitors select individual cases for monitoring. The Coordination Board shall prepare and regularly update a manual for monitors in order to standardize their practices and ensure a coherent application of the information gathering and reporting methodology.

Monitors shall be granted access to the case file referred to in Article 8 that has been selected for monitoring (e.g. medical documentation, etc.), presence at any hearing of irregular migrants and applicants for international protection, and to inspect the detention facilities and to interview irregular migrants and applicants for international protection, provided that the person concerned provides his/her consent. Interviews shall take place in a private and confidential environment without the presence of the police.

The monitors are obliged to comply with the instructions of authorised employees of the Ministry of the Interior about the restriction of movement in restricted areas referred to in Article 6 of this Agreement.

Within seven days after a monitoring has been carried out, the monitors shall jointly prepare an individual report and submit it to the Coordination Board. The report shall contain data on the visit carried out to the locations referred to in Article 6 of this Agreement.

Article 8 INDEPENDENT MONITORING MECHANISM'S ACTIVITIES

Monitors shall conduct the following activities:

(1) monitorings of the actions of police officers and their respect for fundamental rights of irregular migrants and applicants for international protection in enforcing the regulations governing state border control and international protection (hereinafter: monitoring of police actions). The support of professional translators and/or interpreters shall be provided if necessary.

Monitorings consists of:

(a) announced monitorings at all locations referred to in Article 6;

(b) unannounced monitorings at all locations referred to in Article 6, including at the green border;

(2) access to individual files;

(a) access to the file of the case being monitored;

(b) access to files of finally disposed cases on received complaints about an alleged illegal action towards irregular migrants and applicants for international protection;

(3) access to the activities and reports of the General Police Directorate regarding an alleged illegal action towards irregular migrants and applicants for international protection.

In the implementation of the activities referred to in Paragraph 1 of this Article, members of the Coordination Board, monitors and interpreters/translators are obliged to comply with the regulations on personal data protection and data confidentiality.

Members of the Coordination Board, monitors and interpreters/translators shall sign a separate statement by which they will commit to keep all information confidential, which will be available to them for the purpose of the implementation of the Mechanism.

Workshops on the topic of "Discussion on the results of the monitoring mechanism and border control activities" shall be organised with the participation of monitors' representatives and representatives of the Ministry of the Interior at least once a year, after the publication of the annual report of the Coordination Board, in order to discuss the experience gained from the implementation of the Mechanism and the recommendations of the Advisory Board.

Article 9 ACCESS TO FILES

The monitors shall be provided access to files on received complaints about an alleged illegal activity towards irregular migrants and applicants for international protection, i.e. to activities and

reports of the General Police Directorate regarding alleged illegal action towards irregular migrants and applicants for international protection.

The authorisations of the monitors referred to in Paragraph 1 of this Article include access to information contained in the Information System of the Ministry of the Interior based on a written or oral request to the Ministry of the Interior. The Ministry of the Interior shall deliver to the monitors a printout of the requested data contained in the Information System of the Ministry of the Interior within 24 hours, which must be compiled in such a way that it is possible to determine the specific event or the person to whom the event relates.

The monitors shall be enabled to interview police officers who acted in the selected file as well as the complainant if he/she is present in the territory of the Republic of Croatia and if he/she consents to that.

Within seven days from having gained access to the file, the monitors shall jointly prepare an individual report and submit it to the Coordination Board.

The Coordination Board shall cooperate closely with all relevant state bodies that are obliged, under national law, to investigate allegations of fundamental rights violations, including the insurance that complaints are dealt with expeditiously and in an appropriate manner.

In line with the applicable national legal framework, the Coordination Board shall submit via the contact officer of the Ministry of the Interior its reports on irregularities and/or fundamental rights violations to the competent state bodies, primarily the Internal Control Service of the Ministry of the Interior, the State Attorney's Office as well as the Ombudswoman's Office.

Article 10 FUNDING

The implementation of the Independent Monitoring Mechanism's activities shall be financed under the Croatian National Programme of the Integrated Border Management Fund – the Instrument for Financial Support for Border Management and Visa Policy for the 2021 – 2027, on the basis of a funding decision issued by the Managing Authority in the Republic of Croatia.

Article 11 FINAL PROVISIONS

The Independent Monitoring Mechanism shall be established for a period of 24 months, which period shall be automatically extended.

The Independent Monitoring Mechanism's activities shall start on the date of the last signature of this Agreement.

The signatories of the Agreement may withdraw from it with written notice to the other signatories.

The decision to withdraw shall take effect within 15 days from the date of submitting the notice referred to in Paragraph 3 of this Article.

This Agreement is concluded in seven (7) identical copies, of which each party retains one.

ANNEX 2.

Summary Update on the IMM to the Advisory Board (30/01/2025)

Independent Monitoring Mechanism in Croatia (IMM)

Head of the Coordination Board
Prof. Dr. Anna-Maria Getoš Kalac

Advisory Board to the Independent Monitoring Mechanism in Croatia

Chair of the Advisory Board
Head of Frontex' Fundamental Rights Office
Mr Jonas Grimheden

Zagreb, 30th January 2025

Subject: Summary Update on the IMM to the Advisory Board

Dear Mr Grimheden,

as announced in our letter dated 23/12/2024 we hereby provide the Advisory Board to the IMM with an update on recent developments as well as ongoing and planned activities. However, before doing so throughout the following sections, the Coordination Board would like to use this opportunity to underline its appreciation of the Advisory Board's continued commitment and for you taking on its chairing. We are most certain that the Advisory Board's expert advice and the opportunity to discuss IMM's developments and activities with you will considerably enhance not only our monitoring operations, but more importantly thereby also significantly contribute to the respect of fundamental rights in Croatia in the area of border protection, irregular migration and international protection as conducted by police officers of the Ministry of Interior (MoI).

As you know, the IMM conducts its operations on the basis of two consecutive cooperation agreements concluded between the MoI on the one side and four NGOs¹ and one natural person² on the other side. The duration of IMM's 1st mandate covered the period between 08/06/2021-

¹ The four NGOs: Croatian Academy of Medical Sciences (CAMS); Croatian Academy of Legal Sciences (CALs); Centre for Cultural Dialogue (CCD); Croatian Red Cross (CRC).

² The natural person/expert: Prof. Dr. Iris Goldner Lang.



08/06/2022,³ whereas IMM's 2nd mandate commenced on 04/11/2022⁴ and (after an initially set period of 18, respectively 24 months⁵) has as of 04/11/2024 been automatically extended for an indefinite term. The effective entry into force of said indefinite term of IMM's 2nd mandate is obviously one of the major improvements that occurred during the Advisory Board's temporary unavailability of chairmanship between 08/07/2024-16/01/2025. Now, based on the automatic extension of IMM's 2nd mandate and after successfully overcoming the challenges both the IMM and the Mol faced between 21/09/2023-06/12/2024, the Mol back in December 2024 contractually settled its relationship with all IMM members⁶ and associates⁷ until 30/06/2026, thus also settling all outstanding remunerations for implemented IMM activities until 31/12/2024.

Following the challenges encountered throughout IMM's 2nd mandate and up to 06/12/2024, in terms of lessons learned and good practices that have meanwhile been established by the Head of the Coordination Board and the Mol, we would like to highlight the necessity of close cooperation and open communication between all relevant departments/units of the Mol on the one side and all relevant IMM members and associates on the other side regarding all matters concerning or in effect impacting IMM operations, particularly including Mol's internal project management, contracting, reporting and auditing rules and procedures.⁸ Said close cooperation and open communication is not only a fundamental precondition for a smooth and timely implementation of IMM's mandate, but also an effective safeguard for IMM's full operational independence and autonomy. In this context the Coordination Board emphasises that the challenges as documented in IMM's Semi-Annual Report have throughout December 2024 and January 2025 all been addressed and largely resolved.

In the process of doing so and with the aim of further upgrading IMM's overall operations, a systematic and in-depth analysis of IMM's normative, methodological and operational framework has been launched based on all provisions of IMM's current Cooperation Agreement and against the backdrop of relevant European normative, methodological and operational monitoring frameworks, particularly Article 10 of the Screening Regulation (EU) 2024/1356 and Article 43(4)

³ Cooperation Agreement for the Implementation of the Independent Monitoring Mechanism of the Conduct of Police Officers of the Ministry of Interior in the Area of Irregular Migration and International Protection (signed 08/06/2021; hereinafter: 1st Cooperation Agreement).

⁴ Cooperation Agreement for the Implementation of the Independent Monitoring Mechanism for the Protection of Fundamental Rights in the Conduct of Police Officers of the Ministry of Interior in the Area of Border Protection, Irregular Migration and International Protection (signed 04/11/2022; hereinafter: current Cooperation Agreement).

⁵ Explained in full detail in [IMM's Semi-Annual Report](#) (proofread version 19th December 2024), pp. 5–7.

⁶ **IMM members** include (a) the **IMM's Coordination Board members**: one representative of CAMS (Assoc. Prof. Dr. Krunoslav Capak, member of the Coordination Board), one representative of CALS (Prof. Dr. Anna-Maria Getoš Kalac, Head of the Coordination Board); one representative of the CCD (Mr Nermin Botonjić, Secretary of the Coordination Board); one representative of the CRC (Ms Selma Ilić, Deputy Head of the Coordination Board); and (b) the **IMM's monitors** (aka direct activity providers): two representatives of CAMS (Prof. Dr. Nadan Rustemović, dr. med. and Prof. Dr. Mario Starešinić, prim. dr. med.), two representatives of CALS (Prof. Dr. Davorin Lapaš and Prof. Dr. Damir Primorac); two representatives of the CCD (Mr Samir Ilijazi and Mr Admir Muhić); two representatives of the CRC (Mr Branislav Tomić and Mr Živko Šimunović).

⁷ **IMM associates** include: one administrative associate (Mr Mihajlo Šprem), one financial associate (Assist. Prof. Dr. Reana Bezić), one public relations associate (Ms Ivana Radić) and one administrative associate to the Coordination Board (Dr. Petra Šprem).

⁸ Otherwise, the IMM risks its monitoring operations, oversight and reporting activities being unnecessarily delayed due to internal Mol project management, contracting, reporting and auditing rules and procedures which have prior to 06/12/2024 been communicated to the Coordination Board inconsistently, retroactively and mainly on a case-by-case basis. See in more detail [IMM's Semi-Annual Report](#) (proofread version 19th December 2024), pp. 2, 5–8.

of the Asylum Procedure Regulation (EU) 2024/1348, the 2024 FRA Guidance on independent monitoring mechanisms, as well as CPT's rules, procedures and practices and the Frontex' Fundamental Rights Office monitoring methodology, to name but a few.

The preliminary results of said analysis form the basis for the currently ongoing process of upgrading IMM's normative, methodological and operational framework, whereby the challenge currently lies in doing so swiftly on the one hand, while simultaneously also conducting monitoring operations in the field on the other hand (as done successfully on 07/12/2024 and 28/01/2025), whereas parallelly setting up enhanced administrative, communicational, PR and financial IMM support tasks and workflows. In this sense the IMM is as we speak in the middle of a highly dynamic, extremely complex and very productive phase, so that the forthcoming discussions and meeting with the Advisory Board on February 25th in Zagreb come at a perfect time. The following listing provides for an overview of finalised/ongoing key upgrades initiated after 06/12/2024:

1. Normative framework

- 1.1. Protocols and rules of procedure: The Coordination Board is drafting a set of internal protocols and rules of procedure based on the provisions of the current Cooperation Agreement and in light of the 1st Cooperation Agreement in order to maximise the IMM's monitoring powers based on the extended scope of its current mandate. This includes rules of procedure further regulating the functioning of the Coordination Board itself, a protocol further defining IMM's monitoring operations, monitors' reporting obligations, conduct during filed operations, handling of limited/classified data and its protection, communication channels, PR protocols etc.
- 1.2. Cooperation protocols and procedures: A Cooperation protocol to be discussed with and jointly adopted by the IMM and the Mol (Internal Affairs) as well as the Public Prosecution of the Republic of Croatia and the Croatian Ombudswoman is being drafted, in order to ensure proper cooperation and operational points of contact between said actors and the IMM and vice versa. Said rules and procedures will enable the IMM to make full use of its authority to request the initiation of official investigations by the relevant state bodies upon the discovery of irregularities and potential violations of fundamental rights. This should also ensure that the IMM follows up on such investigations and their outcomes, enabling the IMM to assess their effectiveness and to respond accordingly in case of lack thereof.
- 1.3. Security clearances: The Coordination Board has put a request to the Mol to initiate the process of obtaining security clearances for IMM members and associates. The Mol has sent a relevant request to the Office of the National Security Council of the Republic of Croatia, based on which's opinion the appropriate security check will be conducted and the respective type of security certificate issued (or not). Since this is a process that might take several months and in order to ensure the continuance of IMM's monitoring operations, IMM members and associates have been security-briefed by the Mol's Information Security Department and issued security certificates for accessing and handling limited Mol data.

- 1.4. Confidentiality, conflict of interest and non-liability: Written statements by IMM members and associates have been requested/received with regards to respecting highest standards of confidentiality (including after the end of their IMM involvement), objectivity, independence, conflict of actual and potential interest or appearances of such conflict of interest and everyone declared themselves responsible for handling own insurance and security measures (non-liability of IMM or Mol).

2. Methodological framework

- 2.1. Monitoring forms: A new set of forms for monitors has been developed and is being piloted in the field as we speak. This methodological upgrade will maximise the quality and quantity of information provided by ways of monitors' written reporting to the Coordination Board, both in terms of monitored locations as well as conducted interviews with migrants and other relevant persons. Thus, the new form is more user-friendly for monitors and also enables both monitors as well as the Coordination Board to track and follow up on investigations into potential fundamental rights violations and recommendations issued to the Mol and/or their implementation thereof. The new forms also specify which evidence/documentation and how needs to be collected and stored. Finally, the new monitoring forms are designed to enable automated data extraction for analytical purposes as well as IMM's reporting activities.
- 2.2. Monitors' reporting to the Coordination Board: In addition to the monitors' written reporting to the Coordination Board thus far, the monitors as a rule will present their reports at the meetings of the Coordination Board in person and they are to be consulted on matters concerning or impacting monitoring operations in the field (e.g., protocols, methodology, forms, workflows, etc.).
- 2.3. Monitors' power of investigative initiative: When it comes to the monitoring operations as such (in line with the 1st as well as the current Cooperation Agreement) the monitors, all experts and practitioners in their respective fields and territories, have the power of investigative initiative when proposing to the Coordination Board locations, dates and types (announced and unannounced) of their monitoring operations. Thus far it was mainly the Coordination Board that initiated single monitoring operations, but meanwhile monitors have been encouraged to make full use of their investigative initiative and the currently ongoing field operations reflect this extremely well.
- 2.4. Sampling methodology for monitoring operations: In order to upgrade the sampling methodology of the monitors and the Coordination Board, the Mol has obliged itself to provide the IMM not only past-month's statistics (as it has done so far), but also to upgrade the statistical coverage (full national sample and additional variables) and to provide the IMM with the Mol's own risk assessments for the month(s) ahead. The Mol's contact person for the IMM, the Head of the Coordination Board and the Head of the Analytics Unit of the Border Police have already agreed on said additional statistical variables and extended coverage as well as basic parameters of Mol's risk assessments to be provided to the IMM – the first set is to be received in February.

- 2.5. Mol Action Plan: Following the publishing of IMM's Semi-Annual Report (proofread version 19th December 2024) the Mol has submitted to the Coordination Board its Action Plan. In order to enable the IMM to continuously track Mol's implementation of single measures announced in the Action Plan, a new section has been included and the Mol has obliged itself to inform the Coordination Board on a monthly basis about the progress in implementing each of the measures. Said methodology also enables the Coordination Board to provide its feedback to the Mol on a monthly basis, rather than within the scope of its (semi)annual reporting activities.
- 2.6. Reports and Recommendations: The upgrades as summarised in points 2.1.-2.5. will inevitably be reflected in an upgraded methodology and structure of IMM's next report. It is important to point out that due to previous delays and unavoidable discrepancies between the current Cooperation Agreement on the one side and the Mol's project plan on the other side, the terms "*semi-annual*" and "*annual*" IMM reports (implying 6 months and 12 months) are misleading. Based on the Mol's project plan IMM's monitoring activities are being implemented between 01/01/2025-30/09/2025, whereas between 01/10/2025-31/03/2026 the IMM "annual" report will be drafted and prior to publication provided to the Mol for opportunity to comment on potential errors of fact, followed by consultations with the Advisory Board and thus finalisation by the Coordination Board. Between 01/04/2026-30/06/2026 the IMM's "annual" report with recommendations will be published, Mol's Action Plan received and a workshop with Mol representatives held.

3. Operational framework

- 3.1. Data protection: Due to upgraded information security and data protection standards, the IMM in cooperation with the Mol is in the process of ensuring that all IMM data/files are stored exclusively in one secure virtual location with restricted access for IMM members and associates only. Until said data/file storage, access and collaboration has been provided to the IMM by the Mol, the IMM is currently using a shared disk.
- 3.2. IMM communication: In December 2024 and January 2025 several IMM email accounts have been set up by the Mol's IT department for the Coordination Board, the IMM's administration, finances and PR. All IMM members have been offered the possibility to have an email account set up in order to limit communication via private or non-IMM professional email accounts, thus increasing data protection.
- 3.3. Administrative support: The IMM has meanwhile been adequately equipped with much needed administrative support. Relevant support tasks and workflows are being defined and implemented, whereas associates are being trained in the process.
- 3.4. Financial reporting: In close cooperation with the Mol the IMM's financial associate has defined clear rules and procedures for IMM members' and associates' reporting on implemented activities and submitted deliverables for financial purposes, thereby ensuring a timely and auditable remuneration of IMM members and associates.

3.5. Public relations: The IMM website has been made publicly available and two IMM associates have been provided with administrative access to its main features. However, since the IMM website is hosted by a governmental provider the IMM and the MoI are still in the process of ensuring swift administration and support for the website's structural features and any web administration that goes beyond changing the content of the existing structure. Two IMM associates have completed training for administering the IMM website. Early February 2025 a contact form enabling the interested public to communicate with the IMM is scheduled to be published on the website together with IMM's contact for the press.

The just provided listing of finalised/ongoing IMM upgrades in our assessment provides the Advisory Board with an accurate and transparent overview of most recent developments and is intended to complement the IMM's Semi-Annual Report and to provide a basis for discussions with and advice by the members of the Advisory Board at the forthcoming meeting in Zagreb. With regards to the Advisory Board's comments and recommendations referring specifically to the IMM's Semi-Annual Report, we would kindly ask you to provide us with these at least a few days in advance of the Zagreb meeting on February 25th.

We look forward to welcoming you in Zagreb and remain at your disposal in case of questions and need for any further information.

ANNEX 3.

AB IMM Recommendations on IMM's Semi-Annual Report (27/03/2025)

Recommendations of the Advisory Board

On the Semi-annual Report of the Independent Monitoring Mechanism (IMM) of Croatia (November 2022 – June 2023 – December 2023 – July 2024)

The Advisory Board is an informal body linked to the Independent Monitoring Mechanism (hereinafter: IMM) in Croatia but not forming part of it, tasked to provide recommendations for the enhancement of the independence and functioning of the IMM. The Advisory Board provides recommendations in response to the reports of monitoring activities carried out by the IMM.

The Advisory Board held meetings with representatives of the Coordination Board of the IMM on 16 February 2023, 14 November 2023, and on 3 April 2024 under the chairpersonship of the European Commission and then the European Union Agency for Fundamental Rights. On 25 February 2025, under the new chairpersonship of Frontex' Fundamental Rights Office, a fourth meeting was held. On 22 December 2023, the Advisory Board provided guidance to the IMM on the use of external sources when drafting their reports.

The Advisory Board would like to convey its appreciation for the latest semi-annual report of the IMM (hereinafter: Report) – the English translation of the document was received in January 2025. The Report covers the following three periods: 4 November 2022 - 15 June 2023, 15 June 2023 - 31 December 2023 and 31 December 2023 - 23 July 2024.¹ The Advisory Board did not receive the annual report.

Herewith, the following observations on the content of the Report and recommendations on related work are provided.

Advisory Board's Recommendations

1. Overarching recommendations

- a) The Advisory Board suggests that greater emphasis is placed in IMM's reports on substantive analysis of whether fundamental rights of refugees and migrants were upheld by border police of the Ministry of Interior (hereinafter: MoI) in each instance observed. It is equally important to focus the content of the IMM's report, and particularly its recommendations, on the work of the border police in Croatia, to uphold the protection of fundamental rights of refugees and migrants in line with the mandate of the IMM.
- b) Delays in analysing monitoring findings hampers timely follow up on incidents and eventual follow-up action. Issuing reports in a timely manner is recommended to ensure the work of the IMM remains relevant. The present semi-annual report relates to monitoring visits that took place during the summer of 2023, however it was not issued in its initial form until July 2024.

2. Specific recommendations

2.1 On the functioning of the IMM

- a) **Information from third parties:** the Advisory Board appreciates that the IMM can receive information and reports of incidents in Croatian and English via its webpage – www.nmn.hr/contact/32. Whereas the IMM is not empowered to investigate individual complaints, which should be referred to the competent bodies, the information received through this channel should be a guiding factor in the planning of future monitoring visits.

¹ The English and the Croatian language version of the semi-annual report are available on the webpage of the IMM in the relevant subsection "[Reports](#)" and "[Izješća](#)" respectively.

- b) **Synergies with other actors:** the Advisory Board encourages the IMM to enhance cooperation with other statutory public bodies in Croatia, such as the State Attorney's Office, the Ombudswoman's Office, and the Office of the Ombudswoman for Children. This should encompass the collection and sharing of evidence of alleged human rights violations and referrals to competent national bodies, as noted above. The report of the IMM did not contain information on any referrals from the IMM to the Croatian Ombuds-institutions nor to the State Attorney's Office. Reports by relevant national and international human rights monitoring bodies should be used to contextualise the findings from the field visits.
- c) **Sustainability and independence of funding** are key to ensuring the necessary safeguards for establishing an independent national monitoring mechanism. To further foster predictable and regular receipt of funds, the Advisory Board recommends that the IMM ensures regular dialogue on reimbursements under the project.

2.2 Monitoring by the IMM

- a) **Monitoring methodology:** The Advisory Board recommends that the planning and organisation of monitoring activities should include the reasoning behind the selection of locations visited. For instance, it would be beneficial to clarify why certain areas, such as the Cetinograd region, where official data showed a higher number of irregular movements, were not chosen, and to explain the absence of visits to the Registration Centre in Dugi Dol.

The Advisory Board also recommends the publication of information regarding the monitoring methodology applied, to promote transparency and clear monitoring criteria.

b) Field visits of the IMM monitors

- **Timing and presentation of on-site visits:** the Advisory Board recommends a certain regularity of monitoring visits. These should be scheduled based on fundamental rights risk assessments and reports about alleged violations and timed to cover different periods of the year. It is recommended to include a list of the on-site visits conducted in the reporting period in the IMM report to assist the reader in gaining a clearer understanding of the context of the findings.
- **Unannounced visits** serve as an effective model of field monitoring. The Advisory Board underlines that the IMM monitors should continue to seek access to all areas relevant to their work.
- **Event-triggered monitoring** is considered a positive format by the Advisory Board. When monitoring visits are carried out in response to external information received by the IMM about alleged fundamental rights violations, the Advisory Board recommends that the monitors make additional efforts to speak to the persons involved, including when the persons concerned are outside Croatia.
- **Monitoring locations:** the Advisory Board recommends greater focus on monitoring the green border, covering locations based on the likelihood of apprehension of refugees and migrants (risk assessment, data analysis), as well as maximising the use of all other available sources (including CCTV and police files to which the IMM has access). The monitoring of places of detention and of reception facilities and the analysis of the findings may be based on the standards of the European Committee for the Prevention of Torture² and those of the EU Asylum Agency.³
- Should the above have financial implications, these should be considered in view of future adjustments of the project that finances the IMM's activities.

² See e.g. [Standards and tools - CPT](#)

³ See e.g. [Monitoring of the CEAS | European Union Agency for Asylum](#)

c) Communication with refugees and migrants

- **Interviews with refugees and migrants and the use of interpreters:** the Advisory Board expresses its appreciation that the monitors speak to individuals, as part of the information collection efforts, and that it does this without the presence of the police. It recommends that professional interpreters should be used for this purpose and that information on the number of migrants interviewed should be disaggregated by sex and age in the report, whenever this is possible without making the individuals identifiable.
- **Persons in vulnerable situations:** The Advisory Board attaches great importance to persons in vulnerable situations and recommends that the IMM considers broadening the scope of its monitoring on how the authorities respond to different types of vulnerabilities. Additionally, it recommends that – inasmuch as no identifiable details are shared – the IMM provide reports on referrals made to other organisations to respond to the needs of individuals interviewed. The Advisory Board also suggests that the IMM provide detailed information on how children’s rights were assessed during on-site visits.

2.3 Training and exchange of experience

The Advisory Board recommends exploring further learning opportunities, such as exchanges between the actors working in the field of human rights monitoring on each other’s working methods. The Advisory Board’s Chair – the Frontex Fundamental Rights Officer – offers a study visit to Frontex HQ for the IMM to discuss working methodologies, including the Fundamental Rights Office’s monitoring platform “OCEAN” which keeps track of mission reports, shows where monitors are as well as the follow up of the findings from missions. The Chair of the Advisory Board further proposed that Frontex’s Fundamental Rights Office conduct joint field monitoring with the IMM for the purpose of comparing observations.

2.4 Future considerations

The IMM may be assessed in the context of the Pact on Migration and Asylum. Consequently, it is anticipated that there will be a heightened interest in, and scrutiny of, the work of this mechanism. In May 2024, the [Screening Regulation](#) (EU) 2024/1356 introduced a duty to have independent national monitoring mechanisms in place by mid-2026. As required under Article 10 of the Regulation, in September 2024, the EU Agency for Fundamental Rights published [guidance](#) to support Member States in designing their independent national monitoring mechanisms. The Screening Regulation sets high standards for monitoring, for example, in terms of independence, effectiveness, the activities to monitor, the follow up to monitoring findings as well as in relation to synergies with other mechanisms. The Advisory Board recommends close reflection on the extension of the IMM in its present form or development of any future monitoring mechanism that Croatia will have to establish under the Pact, respecting the current role of national statutory human rights bodies, particularly the Croatian Ombudsperson, as per Article 10 of the Screening Regulation. It is noted, however, that at present the IMM operates within the confines of the Cooperation Agreement with the Ministry of Interior and focuses on monitoring of border police in the area of irregular migration and international protection. The Advisory Board considers it advisable that the IMM maintains a broad thematic scope. As pointed out in FRA’s guidance on monitoring, Member State may decide to extend the mechanism to cover border management activities beyond the screening, where appropriate.

Warsaw, 27 March 2025

Jonas Grimheden
Chair of the Advisory Board

ANNEX 4.

**IMM's Response to the Advisory Board's Recommendations
(07/04/2025)**

COORDINATION BOARD OF THE CROATIAN INDEPENDENT MONITORING MECHANISM

Zagreb, 7th April 2025

On January 14th 2025, the Coordination Board of the Croatian Independent Monitoring Mechanism (hereinafter: CB IMM) provided the Advisory Board to the IMM (hereinafter: AB IMM) with the English translation of [iMM's Semi-Annual Report](#) (July 2024, proofread version December 2024; hereinafter: IMM Report 2024), as published the same day on IMM's website. On 30th January 2025 the CB IMM thus provided the AB IMM with an update on implemented and ongoing activities aimed at upgrading IMM's normative, methodological and operational framework (hereinafter: CB IMM Update), which addresses many of the issues that were later on recognised by the AB IMM by its recommendations. On February 25th 2025, the AB IMM held its meeting with the CB IMM in Zagreb/Croatia, whereby the IMM Report 2024, the draft Recommendations of the AB IMM on the IMM Report 2024 and the CB IMM Update were jointly discussed under Frontex' FRO Chairmanship of the AB IMM. On 31st March 2025 the CB IMM received the AB IMM final [Recommendations on the IMM Report 2024](#) (hereinafter: AB IMM Recommendations 2025), following which the CB IMM hereby provides its

RESPONSE TO THE AB IMM RECOMMENDATIONS 2025

thereby committing to the implementation of the recommendations and thus providing for relevant clarifications. The following sections respond to each recommendation of the AB IMM by using the same order and numbering (while summarising the recommendation) and have already been discussed at the meeting held on 25th February 2025, whereas major responses have been provided to the AB IMM on 7th March 2025.

1. CB IMM Responses to AB IMM Overarching Recommendations

a) The CB IMM takes on the recommendation to (1) place greater emphasis in its reports on substantive analysis of whether fundamental rights of refugees and migrants were upheld by border police of the Ministry of Interior (hereinafter: MoI) in each instance observed, and to (2) focus on the content of its reports, particularly its recommendations. The CB IMM commits to further improve the substantive analysis of fundamental rights violations and to publish all the relevant assessments in its next report together with even more targeted recommendations to the MoI, whereby it stresses that the IMM operates within the framework of its Cooperation Agreement with the MoI, which establishes the IMM as a non-complaint-based monitoring mechanism. In this regard the CB IMM highlights that its fundamental rights assessments of instances the IMM observed might erroneously be mistaken for "complaint-based decisions" and thus create unnecessary confusion among diverse (non)governmental actors and the public in general about the IMM acting as a "complaint-based mechanism".¹ Finally, despite granting broad access to MoI data,

¹ See for example the [2024 Annual Report of the Croatian Ombudswoman](#) (p. 275) or the [2025 Report on Reception conditions in Croatia of the Swiss Refugee Council](#) (p. 25-26), which conflate IMM's mandate to provide an assessment of whether fundamental rights of refugees and migrants were upheld by police officers of the MoI in specific instances observed by IMM's monitors, with a complaint-based mandate to receive, act upon or decide individual complaints. Information about potential violations of fundamental rights of migrants by police officers of the MoI received by the CB IMM from NGOs or individuals and gathered using public sources (e.g., media reports, NGO reports etc.), together with the statistical reports monthly provided to the IMM by the MoI, form the basis for IMM monitors' fundamental rights risk assessment, based on which monitoring operations are conducted. Said procedure is not to be conflated with



locations, personnel and files, incl. the Mol's information system, the Cooperation Agreement also entails necessary restrictions impacting the scope of IMM's public reporting, whereby all (suspected) fundamental rights violations detected through IMM's monitoring operations are already being regularly and systematically referred to the competent Croatian authorities (namely the Mol's Internal Affairs service, the Public Prosecution, the Croatian Ombudswoman and other competent authorities) via the IMM's contact officer in the Mol. Aggregate data about said referrals and IMM follow-ups shall be published in IMM's next report.

b) The CB IMM fully agrees that delays in analysing monitoring findings hamper timely follow up on incidents as well as eventual follow up action and is therefore already regularly and systematically referring all (suspected) fundamental rights violations detected through IMM's monitoring operations to the competent Croatian authorities via the IMM's contact officer in the Mol. The CB IMM thus regularly and systematically provides the Mol via the IMM's contact officer with targeted recommendations after each set of IMM monitoring operations. Aggregate data about said recommendations as well as the referrals with information about IMM follow-ups shall be published in IMM's next report. The CB IMM thus commits to issue its next report without delays, provided that the Mol continues to fully implement the Cooperation Agreement and provides for the necessary cooperation conditions as reaffirmed in December 2024.² Finally, in line with the AB IMM recommendations and conclusions of the meeting held on 25th January 2025, the Mol has already in March 2025 been provided with a relevant proposal for further upgrading IMM's activities while safeguarding the full implementation of the Cooperation Agreement in a timely manner.

2. CB IMM Responses to AB IMM Specific Recommendations

2.1 On the Functioning of the IMM

a) **Information from third parties:** The CB IMM acknowledges the appreciation of the AB IMM for enabling the receipt of information and reports of incidents in Croatian and English via the IMM official webpage, although the "contact-form" is primarily intended for communication with interested actors and the public as foreseen by the Cooperation Agreement, not for "filing complaints". The CB IMM reiterates that it is not set up as a complaint-based mechanism and therefore cannot receive any "complaints". Any information about (alleged) fundamental rights violations of migrants by police officers of the Mol via said "contact-form", previously received occasionally by way of emails to members of the CB IMM, have always been used and shall continue to be used together with publicly available information/reports and the statistical reports monthly provided to the IMM by the Mol as the information basis for IMM monitors' fundamental rights risk assessment, based on which monitoring operations are conducted. As of January 2025, when the IMM was provided admin access to the IMM webpage and the "contact-form", the IMM (1) confirms the receipt of any such information message via the "contact-form", (2) refers the information providers to the competent Croatian authorities (as indicated on the relevant webpage) and thus (3) within the framework of IMM's fundamental rights risk assessment utilises the information received in the framework of its monitoring operations. The CB IMM also systematically collects anonymised core data about received messages via the "contact-form" and commits to provide relevant aggregate data in its next report.

"complaint-based" investigations or decisions, nor is the receipt or gathering of such information on potential violations to be considered as a "complaint receipt" by the IMM. Therefore, IMM's mandate and activities do not overlap with the mandates and activities of the competent "complaint-based" Croatian authorities, just as the mandate and activities of various other actors engaged in assessing and reporting on potential fundamental rights violations of migrants by police officers of the Mol (e.g., Croatian and international NGOs) do not overlap with the mandates and activities of the competent "complaint-based" Croatian authorities, as they too are not to be considered "complaint-based" investigations and/or decisions.

² The causes for the delays in IMM monitoring operations and publishing the IMM Report 2024 clearly fall outside of the competences and responsibilities of the CB IMM and have thus been documented in the Report itself (pp. 2, 5-8).

b) Synergies with other actors: In line with the Cooperation Agreement the CB IMM already regularly and systematically refers all (suspected) fundamental rights violations detected through IMM's monitoring operations to the competent Croatian authorities via the IMM's contact officer in the MoI. The CB IMM takes note of the AB IMM recommendation to enhance its cooperation with other statutory public bodies in Croatia, such as the Public Prosecution, the Ombudswoman's Office, and the Office of the Ombudswoman for Children, and thus commits to directly implement such cooperation on the basis of a jointly adopted "Referral Protocol" among said bodies and the IMM, provided that the MoI secures the relevant conditions for such a mandate. A relevant proposal has already been provided to the MoI, whereby the AB IMM is kindly invited to provide the CB IMM with written practical and operational guidance on implementing such a "Referral Protocol" with joint collection and exchange of "evidence" in line with data protection constraints, classified information provisions, IMM members' confidentiality obligations and feedback provisions for all involved cooperating bodies, to name but a few of the challenges arising for all involved cooperating bodies and the CB IMM. With regards to the AB IMM recommendation to use reports by relevant national and international human rights monitoring bodies to contextualise IMM's findings from the field visits, the CB IMM takes note of said recommendation and shall implement it in line with the relevant provision of the Cooperation Agreement which foresees the IMM report to be based on the findings from IMM's monitoring operations. The CB IMM reaffirms that information contained in such reports has always been used and shall continue to be used together with other publicly available information/reports and the statistical reports monthly provided to the IMM by the MoI as the information basis for IMM monitors' fundamental rights risk assessment, based on which monitoring operations are conducted.

c) Sustainability and independence of funding: The CB IMM fully agrees with the AB IMM that sustainability and independence of funding are key to ensuring the necessary safeguards for establishing an independent national monitoring mechanism. The CB IMM thus confirms that it has continuously ensured and proactively engaged in a regular dialogue with the MoI on sustainability and independence of funding, most recently in March 2025 by providing the MoI with a relevant proposal for further upgrading IMM's activities while safeguarding the full implementation of the Cooperation Agreement in a timely manner. However, the CB IMM points out that it may only make proposals and recommendations with regards to necessary funds for its operations, whereas the MoI has sole competence for the allocation of IMM funds and bears sole responsibility for the fulfilment and timeliness of reimbursements.

2.2 Monitoring by the IMM

a) Monitoring methodology: The CB IMM takes note of the AB IMM recommendation to provide further details about IMM's monitoring methodology, incl. the reasoning behind the selection of specific locations, and commits to publish a topical methodology-section in its next report. The CB IMM further highlights that there is a general need for publishing methodological and operational information by all entities engaging in monitoring fundamental rights violations of persons on the move. Insofar the CB IMM welcomes said recommendation and reiterates its commitment to engage alongside Frontex' FRO in FRA's currently ongoing development of monitoring methodology, in line with the conclusions of the meeting held 25th February 2025, which should ideally also provide for a minimum standard of methodological and operational information that needs to be published by any monitoring entity in order to be considered a relevant source of information. With regards to the AB IMM recommendation to cover the Cetingrad area (incl. Dugi Dol Registration Centre) by IMM's monitoring operations, this has already been done in early February 2025 and prior to receipt of the AB IMM draft recommendations. Finally, as of January 2025 the CB IMM has been implementing a significantly upgraded monitoring methodology which also ensures collection of core data about the selection, planning and organisation of IMM monitoring operations – relevant data shall be published in IMM's next report and should serve as an example of good practice for other entities engaging in comparable monitoring operations.

b) Field Visits of the IMM Monitors

- **Timing and presentation of on-site visits:** The CB IMM takes on the AB IMM recommendation to maintain regularity of monitoring operations, to continue to execute them based on fundamental rights risks assessments and information about alleged violations, while covering different periods of the year. In line with IMM's upgraded monitoring methodology all monitoring operations are being stratified taking into account regularity/consistency through time, geographical coverage as well as fundamental rights risk assessments. Thus, in terms of IMM's selection of locations, additional Mol statistical variables and extended coverage (full national data sample) as well as basic parameters of Mol's own risk assessments are being utilised as of February and March 2025 in organising, planning and executing monitoring operations. The CB IMM has thus provided the Mol with a relevant proposal for the continuance of IMM monitoring operations until 07/2026. Finally, information about timing and locations of conducted IMM monitoring operations will again be published in the next report, whereby the CB IMM notes that in the first 3 months of 2025 IMM's monitors conducted a total of 10 unannounced monitoring operations, including 7 unannounced monitorings of the "green border" throughout Croatia. The said monitoring operations cover a total of 22 monitoring locations (border police stations, border crossings, reception and transit centres for foreigners and reception centres for applicants of international protection).

- **Unannounced visits:** The CB IMM takes note of the AB IMM recommendation stressing the importance of unannounced monitoring operations and reaffirms its commitment to continue its unannounced monitoring operations as a rule. IMM's monitors have full access to all locations, venues, files, persons and the Mol's information system, whereby "unannounced" indeed means that IMM's monitors without any prior notice to the Mol present themselves at the location/venue to be monitored. Same unannounced procedure applies to the "green boarder" where monitorings are conducted without prior notice and once IMM's monitors are already on-sight, whereby IMM's monitors pick the exact locations and the itinerary, while police officers of the Mol accompany them solemnly for security and safety reasons.

- **Event-triggered monitoring:** The CB IMM acknowledges the AB IMM positive consideration of IMM's "event-triggered monitoring" and commits to continue to conduct monitoring operations in response to gathered/received information about specific allegations of fundamental rights violations within the scope of its fundamental rights risk assessments. The CB IMM however points out that such "event triggered monitorings" are not to be conflated with receiving or processing complaints, since the IMM is not set up as a complaint-based monitoring mechanism. Most recently such an "event-triggered monitoring" was conducted between December 2024 and February 2025 following media reports about police violence against persons on the move. The CB IMM has already referred its findings to the competent Croatian authorities via the IMM's contact officer in the Mol and continues to monitor the ongoing investigations. Finally, with regards to the AB IMM recommendation that IMM's monitors make additional efforts to speak to the persons involved even though these are outside of Croatia, the CB IMM clarifies that, in line with the relevant provision of the Cooperation Agreement, IMM's monitors may conduct interviews only with persons who are in the territory of the Republic of Croatia.

- **Monitoring locations:** The CB IMM, in line with its upgraded methodology and based on a fundamental rights risk assessment, as of January 2025 as a rule always includes unannounced visits to the "green boarder" in its monitoring operations and therefore welcomes the AB IMM recommendation to put greater focus on monitoring the "green boarder". The monitoring operations thus as a rule include interviews with persons on the move in all relevant facilities, which corresponds to the AB IMM recommendation to maximise the use of all other available sources. Hereby the relevant national legal provisions serve as the baseline for assessing the encountered conditions in places of detention and of reception facilities.

- **Financial implications:** In line with the AB IMM recommendation that if any of the above should have financial implications and implementing the conclusions of the meeting held on 25th February 2025, the CB IMM has already provided the Mol with a relevant proposal to adjust the project that finances IMM's activities in order to ensure that the Cooperation Agreement is fully implemented.

c) Communication with Refugees and Migrants

- Interviews with refugees and migrants and use of interpreters: IMM's monitors as of January 2025 as a rule conduct interviews with refugees and migrants without the presence of the police while using interpreters whenever possible and therefore welcomes the AB IMM expressed appreciation in this regard. The upgraded data collection and interviewing methodology also ensures that, in line with the AB IMM recommendation, future reports shall provide data on the number of migrants interviewed disaggregated by numerous variables, incl. sex, age, origin, vulnerability, marital/family status, education etc.

- Persons in vulnerable situations: The CB IMM takes on the AB IMM recommendation to broaden the scope of its monitoring on how the authorities respond to different types of vulnerabilities or to provide reports on referrals made to other organisations to respond to the needs of individuals interviewed and to provide detailed information on how children's rights were assessed during on-site visits. Said recommendation has thus far already been implemented by using an upgraded monitoring and interviewing methodology, which places particular emphasis on persons in vulnerable situations, collecting targeted data as well as documentation, enabling tailored evidence-based recommendations after each of the monitoring operations and within IMM's future reports. Depending on further adjustments of the project that finances IMM's activities, a broadening of IMM's monitoring scope would be feasible.

2.3 Training and Exchange of Experience

The CB IMM welcomes the AB IMM recommendation to explore further exchange opportunities between the actors working in the field of human rights monitoring on each other's working methods. The CB IMM fully subscribes to the necessity and benefits of methodological and operational exchange of experience with relevant actors, particularly between the IMM and the Frontex' FRO. In line with the commitments made at the meeting with the AB IMM, the CB IMM has already accepted a relevant invitation from Frontex' FRO and said exchange visit is scheduled for May 2025. Thus, the Head of CB IMM and the Chair of AB IMM (Head of Frontex' FRO) already exchanged insights into their respective monitoring methodologies and shall continue to do so, whereas as a joint monitoring operation including IMM's monitors and Frontex' FRO monitors in Croatia in April has been scheduled as well.

2.4 Future Considerations

The CB IMM takes note of the AB IMM considerations related to the context of the Pact on Migration and Asylum, as a consequence of which it is anticipated that there will be a heightened interest in, and scrutiny of, the work of the IMM. Recognising the new context, the CB IMM has already conducted a systematic and in-depth review of IMM's normative, methodological and operational framework against the backdrop of relevant European and national normative, methodological and operational monitoring frameworks, particularly Article 10 of the Screening Regulation and Article 43(4) of the Asylum Procedure Regulation, the 2024 EU Fundamental Rights Agency (FRA) Guidance on independent monitoring mechanisms, as well as CPT's procedures and practices, the Frontex' FRO monitoring methodology and the Croatian NPM's methodology, to name but a few. Based on said review significant methodological and operational upgrades have already been introduced to IMM's work and presented to the AB IMM. These upgrades and their consequent evaluations together with the acquired practical experiences, as a core part of IMM's next report, shall help inform the design of the national monitoring mechanism to be established under the Pact.

CB IMM Concluding Remarks

It is with great appreciation that the CB IMM accepts the AB IMM Recommendations and commits to their full implementation in line with the Cooperation Agreement and on the basis of the proposed further adjustments of the project that finances IMM's activities by the Mol. The CB IMM remains committed to continuous upgrades of its monitoring methodology and practice, a stronger engagement with relevant human rights bodies and transparent as well as timely reporting on all its monitoring activities, in order to further enhance the protection of fundamental rights of migrants by the Republic of Croatia.

ANNEX 5.

“Letter of Rights and Complaints” Pilot-Form

LETTER OF RIGHTS



Independent Monitoring Mechanism

You have the right to file a complaint about the conduct of Croatian police officers if you have been subjected to physical abuse, excessive or unnecessary use of force, inhumane or degrading treatment, hindered in requesting international protection (asylum or refugee protection), or if police officers have otherwise violated your fundamental rights.

Please tick the appropriate box

I hereby **FILE A COMPLAINT**
about the conduct of the police officers

I have **NO COMPLAINTS**
about the conduct of the police officers

Any complaint will be investigated by the police, which shall be monitored by the Croatian Independent Monitoring Mechanism. This mechanism is not part of any police, judicial or governmental body and its sole mission is to contribute to the respect of fundamental rights by monitoring Croatian police officers' conduct in the area of border surveillance, illegal migration and international protection.

If you are filing a complaint, describe the conduct of the police officers subject to your complaint in as much detail as possible on the back of this letter. For the purpose of potential additional verifications, it is necessary that you are available to the police officers who will be leading the investigation for at least 30 days after submitting your complaint. The contact with the investigators is made personally, upon prior verification of identity.

By signing this letter, I certify that the information provided is accurate and truthful to the best of my knowledge.

third country national's name and surname

third country national's signature

Potpisom ove pouke ovjeravam da je državljaninu treće zemlje bila osigurana mogućnost podnošenja pritužbe i da je obavješten o mogućnosti provjere statusa pritužbe.

ime i prezime policijskog službenika

potpis policijskog službenika

Mjesto i datum: _____

Ustrojstvena jedinica MUP-a: _____



Co-funded by
the European Union

LETTER OF RIGHTS



Independent Monitoring Mechanism

Description of the conduct of the Croatian police officer(s) subject to the complaint

When did the event(s) you complain about occur? Provide the date(s) and time.

Where did the event(s) you complain about occur? Provide the exact location(s) or a detailed description of the location(s).

Who are you complaining against? Provide a detailed description of the Croatian police officer(s) (e.g., name, clothing description, language spoken, physical appearance, what job or functions she/he was doing, etc.).

What happened? Provide a detailed description of the event, preferably in a chronological order. If the alleged violation is still ongoing, please specify (if needed you may provide more information on an additional sheet of paper).

How can we **contact you** and where can we send you the response after the investigation into your statements has been completed?



Co-funded by
the European Union

ANNEX 6.

No Exhaustive Listing of Standards and Guidance on the Protection of Migrants' Fundamental Rights in the Area of Border Management, Irregular Migration and International Protection

Advisory Board to the Independent Monitoring Mechanism in Croatia. (2025, March 27). *Recommendations on the semi-annual report of the Independent Monitoring Mechanism (IMM) of Croatia (November 2022 – June 2023 – December 2023 – July 2024)*. Warsaw;

Croatian Ombudswoman. (2025). *Annual ombudswoman's report for 2024*. Zagreb: Office of the Ombudswoman;

Council of Europe & European Union Agency for Fundamental Rights. (2021). *European standards on legal remedies, complaints mechanisms and effective investigations at borders*. Strasbourg/Vienna;

Council of Europe & European Union Agency for Fundamental Rights. (2023, December 18). *Children in migration: Fundamental rights at European borders*. Strasbourg/Vienna;

European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment. (2003). *Deportation of foreign nationals by air* (Extract from the 13th General Report of the CPT, CPT/Inf(2003)35-part). Strasbourg: Council of Europe;

European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment. (2021). *Report to the Croatian Government on the visit to Croatia carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 10 to 14 August 2020* (CPT/Inf (2021) 29). Strasbourg: Council of Europe;

European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment. (2026). *Draft immigration detention standard* (CPT (2026) 14 PROV). Strasbourg: Council of Europe;

European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment. (n.d.). *Standards*. Retrieved from <https://www.coe.int/en/web/cpt/standards>;

European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment. (n.d.). *Immigration detention*. Retrieved from <https://www.coe.int/en/web/cpt/immigration-detention>;

European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment. (n.d.). *Foreign nationals deprived of their liberty under aliens legislation*. Retrieved from <https://www.coe.int/en/web/cpt/foreign-nationals>;

European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment. (n.d.). *Safeguards for irregular migrants deprived of their liberty*. Retrieved from <https://www.coe.int/en/web/cpt/safeguards-irregular-migrants>;

European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment. (n.d.). *Deportation of foreign nationals*. Retrieved from <https://www.coe.int/en/web/cpt/deportation-foreign-nationals>;

European Union Agency for Fundamental Rights. (2024). *Guidance on investigating alleged ill-treatment at borders*. Luxembourg: Publications Office of the European Union;

European Union Agency for Fundamental Rights. (2024). *Monitoring fundamental rights during screening and the asylum border procedure – A guide on national independent mechanisms*. Luxembourg: Publications Office of the European Union;

European Union Agency for Fundamental Rights. (2025). *Fundamental rights report 2025*. Luxembourg: Publications Office of the European Union;

European Union Agency for Fundamental Rights, European Court of Human Rights, & Council of Europe. (2020). *Handbook on European law relating to asylum, borders and immigration* (2020 ed.). Luxembourg: Publications Office of the European Union;

European Union Agency for Fundamental Rights, European Court of Human Rights, & Council of Europe. (2022). *Handbook on European law relating to the rights of the child* (2022 ed.). Luxembourg: Publications Office of the European Union;

European Union Agency for Fundamental Rights, & Council of Europe. (2020). *Fundamental rights of refugees, asylum applicants and migrants at the European borders*. Vienna/Strasbourg;

Subcommittee on Prevention of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment. (2025). *Visit to Croatia undertaken in 2023: Report of the Subcommittee [on Prevention of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment]*. Geneva: United Nations.

ANNEX 7.

**Detailed Listing of 2025 Monitoring Missions and Operations, incl.
Dates, Locations/Facilities, Green Border Monitorings and Interviews**

Table 9. 2025 Monitoring Missions and Operations by Date and Location

(N_{days}=53; N_{locations}=152; incl. N_{green border}=49)

No.	Mission Date	Location of Operation	Total No. Locations	No. GB Locations
1.	28/01	BPS Imotski; BC Vinjani G.; BC Vinjani D.; TRCF Trilj	4	0
2.	06/02	BPS Cetingrad; RC Dugi Dol; GB	3	1
3.	07/02	BPS Hrvatska Kostajnica; GB; RCAS Zagreb (Porin)	3	1
4.	11/02	BPS Novska; RCF Ježevo	2	0
5.	28/02	RCAS Kutina	1	0
6.	10/03	BPS Metković; BC Nova Sela – Bijača; GB	3	1
7.	13/03	BPS Dvor; GB; RCAS Kutina	3	1
8.	19/03	BPS Korenica; GB; RCF Ježevo	3	1
9.	20/03	BPS Stara Gradiška; GB; RCAS Kutina	3	1
10.	21/03	BPS Novska; GB; RCAS Zagreb (Porin)	3	1
11.	09/04	BC Tovarnik; TRCF Tovarnik	2	0
12.	09/04	BC Ličko Petrovo Selo; GB; RC Dugi Dol	3	1
13.	09/04	BPS Trilj; GB; TRCF Trilj	3	1
14.	10/04	BC Karasovići; BC Gornji Brgat; BPS Gruda; GB	4	1
15.	22/04	BPS Dvor; GB; RCAS Kutina	3	1
16.	08/05	BC Kamensko; BC Aržano; GB; TRCF Trilj	4	1
17.	08/05	BPS Gvozd; GB; RCAS Zagreb (Porin)	3	1
18.	13/05	BPS Cetingrad; GB; RCF Ježevo	3	1
19.	22/05	BPS Vrbanja; GB; TRCF Tovarnik	3	1
20.	22/05	PS Ston; GB	2	1
21.	02/06	PS Knin; GB; BC Strmica; GB	4	2
22.	03/06	RC Dugi Dol; RCAS Zagreb (Porin)	2	0
23.	12/06	BPS Stara Gradiška; GB; RCF Ježevo	3	1
24.	26/06	BPS Tovarnik; GB; TRCF Tovarnik	3	1
25.	26/06	PS Gvozd; GB; RC Dugi Dol	3	1
26.	09/07	BPS Cetingrad; GB; BPS Korenica; GB	4	2
27.	22/07	BPS Metković; GB	2	1
28.	22/07	BPS Stara Gradiška; GB; RCF Ježevo	3	1
29.	24/07	BPS Tovarnik; GB	2	1
30.	29/07	BPS Hrvatska Kostajnica; GB; RCAS Kutina	3	1
31.	12/08	APS Čilipi; MPS Dubrovnik	2	0
32.	21/08	BPS Tovarnik; GB	2	1
33.	27/08	BPS Novska; GB; RCF Ježevo	3	1
34.	09/09	BPS Vrgorac; GB; TRCF Trilj	3	1
35.	24/09	BPS Hrvatska Kostajnica; GB; BPS Dvor	3	1
36.	26/09	BPS Tovarnik; GB; TRCF Tovarnik	3	1
37.	30/09	BPS Gvozd; GB; RCAS Zagreb (Porin)	3	1
38.	06/10	BPS Trilj; TRCF Trilj	2	0
39.	07/10	BPS Korenica; GB; BC Ličko Petrovo Selo; GB	4	2
40.	08/10	BPS Donji Lapac; GB	2	1
41.	11/10	BPS Tovarnik; GB; TRCF Tovarnik	3	1
42.	16/10	BPS Cetingrad; GB; PS Slunj	3	1
43.	21/10	BPS Dvor; GB; RCAS Kutina	3	1

44.	30/10	BPS Gruda; BC Gornji Brgat; GB	3	1
45.	10/11	BPS Dvor; GB; RCAS Zagreb (Porin)	3	1
46.	11/11	BPS Korenica; GB; RCF Ježevo	3	1
47.	20/11	BPS Stara Gradiška; GB; RCAS Kutina	3	1
48.	21/11	BPS Tovarnik; GB; TRCF Tovarnik	3	1
49.	02/12	BPS Novska; GB; RCAS Zagreb (Porin)	3	1
50.	10/12	BPS Hrvatska Kostajnica; GB; RCF Ježevo	3	1
51.	11/12	BPS Metković; GB	2	1
52.	16/12	BPS Cetingrad; GB; RC Dugi Dol	3	1
53.	17/12	BPS Trilj; GB; TRCF Trilj	3	1

Total: 53 Monitoring Missions across 152 Operation Locations, incl. 49 Green Border Monitorings

Methodological note: Table 9 lists the non-interview operational layer of IMM's 2025 monitoring missions and operations by mission date and monitored location/facility. Its counting logic is operation-based, not site-based: repeated visits to the same location or facility are not duplication, but part of IMM's cumulative monitoring design. A single mission day may include more than one monitoring operation and, occasionally, more than one monitor team may be in the field on the same calendar date. Table 9 incl. location/facility-based monitoring operations and green border monitorings, but does not list migrant interview monitoring operations as such. Where, on the same date and at the same facility, monitors conducted both a facility/location monitoring operation and one or more migrant interview monitoring operations, the facility/location operation is listed in Table 9, while the interview operation(s) are listed separately in Table 10.

Abbreviations: BPS (Border Police Station); BC (Border Crossing); TRCF (Transit Reception Centre for Foreigners); RC (Registration Centre); GB (Green border); RCAS (Reception Centre for Asylum Seekers); RCF (Reception Centre for Foreigners); PS (Police Station); MPS (Maritime Police Station); APS (Airport Police Station).

Table 10. 2025 Monitoring Operations: Migrant Interviews by Date and Location

(N_{interviews}=52)

No.	Date	Location
1.	28/01	TRCF Trilj
2.	28/01	TRCF Trilj
3.	06/02	BPS Cetingrad
4.	07/02	RCAS Zagreb (Porin)
5.	11/02	RCF Ježevo
6.	11/02	RCF Ježevo
7.	28/02	RCAS Kutina
8.	28/02	RCAS Kutina
9.	13/03	RCAS Kutina
10.	19/03	RCF Ježevo
11.	19/03	RCF Ježevo
12.	20/03	RCAS Kutina
13.	21/03	RCAS Zagreb (Porin)
14.	21/03	RCAS Zagreb (Porin)
15.	09/04	TRCF Trilj
16.	22/04	RCAS Kutina
17.	22/04	RCAS Kutina
18.	08/05	RCAS Zagreb (Porin)
19.	08/05	RCAS Zagreb (Porin)
20.	08/05	TRCF Trilj
21.	13/05	RCF Ježevo
22.	13/05	RCF Ježevo
23.	22/05	TRCF Tovarnik
24.	03/06	RCAS Zagreb (Porin)

25.	03/06	RCAS Zagreb (Porin)
26.	12/06	RCF Ježevo
27.	12/06	RCF Ježevo
28.	22/07	RCF Ježevo
29.	22/07	RCF Ježevo
30.	29/07	RCAS Kutina
31.	29/07	RCAS Kutina
32.	21/08	TRCF Tovarnik
33.	27/08	RCF Ježevo
34.	27/08	RCF Ježevo
35.	09/09	TRCF Trilj
36.	26/09	TRCF Tovarnik
37.	30/09	RCAS Zagreb (Porin)
38.	30/09	RCAS Zagreb (Porin)
39.	06/10	TRCF Trilj
40.	11/10	TRCF Tovarnik
41.	21/10	RCAS Kutina
42.	21/10	RCAS Kutina
43.	10/11	RCAS Zagreb (Porin)
44.	10/11	RCAS Zagreb (Porin)
45.	11/11	RCF Ježevo
46.	11/11	RCF Ježevo
47.	21/11	TRCF Tovarnik
48.	02/12	RCAS Zagreb (Porin)
49.	02/12	RCAS Zagreb (Porin)
50.	10/12	RCF Ježevo
51.	16/12	RC Dugi Dol
52.	17/12	TRCF Trilj
Total: 52 Interviews across 7 Different Locations with 50 Unique Migrants		

Methodological note: Table 10 lists all 2025 migrant interview monitoring operations and is therefore interview-record-based. Its counting unit is the completed interview-operation record (N=52), not the unique date/location pairing and not the number of unique interviewed migrants. For that reason, the same date and the same facility may appear more than once in Table 10 where more than one interview was conducted at that facility on that date. Such repeated entries are not duplication, but reflect distinct interview monitoring operations. As a rule, interview date/location entries in Table 10 correspond to a same-date location/facility monitoring operation listed in Table 9, except for 21/08 at TRCF Tovarnik, where an interview monitoring operation was conducted, but no facility monitoring operation.

Abbreviations: TRCF (Transit Reception Centre for Foreigners); BPS (Border Police Station); RCAS (Reception Centre for Asylum Seekers); RCF (Reception Centre for Foreigners); RC (Registration Centre).

The Annual Report of the Independent Monitoring Mechanism (IMM) for 2025 was prepared within the framework of the IMM and adopted by the IMM Coordination Board on 31 March 2026. The Report is published by the IMM, consisting of the civil society organisations Croatian Academy of Medical Sciences (CAMS), Croatian Academy of Legal Sciences (CALS), Centre for Cultural Dialogue (CCD), Centre for Balkan Criminology and Security (CBCS), and Croatian Red Cross (CRC), as well as Iris Goldner Lang (in personal capacity).

Conceptualisation, Lead Authorship & Data Analysis

Anna-Maria Getoš Kalac

Methodological Design & Framework Development

Anna-Maria Getoš Kalac & Petra Šprem

Data Curation, Cleaning, Dataset Validation & Quality Control

Goran Livazović & Petra Šprem

Contributing Chapter Authors

Selma Ilić (Chapter 3.3.3.) & Krunoslav Capak (Chapter 3.5.)

Background Research & Supporting Materials

Goran Livazović (Migration Trends), Iris Goldner Lang (Legal Analysis) & Nermin Botonjić (Coordination Board Activities)

Final Text Integration & Editorial Revision

Anna-Maria Getoš Kalac

Acknowledgements to 2025 IMM Monitors

Nadan Rustemović & Mario Starešinić (CAMS); Davorin Lapaš & Damir Primorac (CALS); Samir Ilijazi, Admir Muhić & Nedim Omerović (CCD); Marija Baković & Dunja Degmečić (CBCS); Živko Šimunović & Branislav Tomić (CRC)

Acknowledgements to Former Heads of the IMM Coordination Board

Davor Derenčinović (06/2021-01/2022) & Robert Markt (01/2022-10/2023)

Recommended Citation

Getoš Kalac, A.-M., Ilić, S., & Capak, K. (2026). Annual Report of the Independent Monitoring Mechanism for 2025. Independent Monitoring Mechanism, Zagreb.

© Independent Monitoring Mechanism (IMM), 2026

Zagreb, March 2026

Reproduction is authorised provided the source is acknowledged.