



Report on the Disability Inclusion Assessment of the Parliament of Montenegro

May, 2026

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1. INTRODUCTION

Full participation of persons with disabilities in political and public life is a cornerstone of any democratic society. In Montenegro, one in ten persons has some form of disability¹. Although Montenegro has undertaken efforts to enhance the rights of persons with disabilities in general and political rights in particular, significant gaps remain in ensuring the full and effective participation in political life of persons with disabilities, meaning 10% of the population may encounter barriers to fully engaging in political processes.

Participation in political life is a multifaceted domain involving a wide range of actors. Among these, parliaments play a decisive role through their representative, legislative and oversight functions, in shaping strategic directions, developing legislation, and overseeing the implementation of laws and policies. The Parliament of Montenegro is therefore central to advancing the rights of persons with disabilities through inclusive and accessible lawmaking, oversight, and institutional reforms.

The OSCE Office for Democratic Institutions and Human Rights (ODIHR) has a mandate to assist OSCE participating States in promoting participation in political and public life and to provide expertise and support to strengthen democratic institutions. The 1990 Copenhagen Document² affirms the right of all citizens to seek political or public office without discrimination, while the 1991 Moscow Document³ commits participating States to take steps to ensure equal opportunities for persons with disabilities to participate fully in society and in decision-making processes affecting them. As part of ODIHR's efforts to promote the political participation of persons with disabilities and to advance disability inclusion in democratic institutions, ODIHR is supporting national parliaments in conducting disability inclusion assessments.

Montenegro ratified the United Nations Convention on the Rights of Persons with Disabilities (UN CRPD) in 2009 and thereby assumed binding obligations under Article 29 to ensure full participation of persons with disabilities in political and public life. These obligations extend beyond mere recognition of rights but require the state to adopt proactive, positive measures to ensure 'the opportunity to enjoy' them⁴ on an equal basis with others. In its 2017 Concluding Observations on the initial report of Montenegro,⁵ the UN CRPD Committee expressed concern regarding the persistent and, in some cases, growing exclusion of persons with disabilities from political and public life in Montenegro. The Committee recommended that Montenegro amend its electoral laws and procedures to enable all persons with disabilities to vote and stand for election, ensure physical accessibility of polling stations, safeguard the secrecy of the ballot for all voters regardless of the form of disability, and provide electoral materials and

¹ Strategy for the Protection of Persons with Disabilities from Discrimination and the Promotion of Equality (2022-2027). According to representatives of organisations of persons with disabilities consulted during this assessment, the data collection methods are likely to underestimate the actual number of persons with disabilities in Montenegro.

² [Document of the Copenhagen Meeting of the Conference on the Human Dimension of the CSCE](#) (Copenhagen Document), OSCE, 29 June 1990, para 7.5.

³ [Document of the Moscow Meeting of the Conference on Human Dimension of the CSCE](#) (Moscow Document), OSCE, 3 October 1991, paras 41.2 and 41.3.

⁴ Ilias Bantekas, Michael Ashley Stein and Dimitris Anastasiou, 'Article 29' in 'The UN Convention on the Rights of Persons with Disabilities: A Commentary' (Oxford University Press, 2018).

⁵ UN CRPD Committee, 'Concluding observations on the initial report of Montenegro' (2017) CRPD/C/MNE/CO/1, para 52.

information in accessible formats.⁶ Ensuring the right to vote for persons with disabilities is a fundamental component of building a disability-inclusive parliament and strengthening representative democracy overall.

Montenegro's EU accession process, initiated in 2012, adds a layer of responsibility⁷. The country is expected to harmonize its legislation with the EU *acquis*, including those relevant to the rights of persons with disabilities. Under accession negotiations, Montenegro is required not only to adopt a broad spectrum of the EU *acquis* that mainstreams or explicitly targets the rights of persons with disabilities, but also to advance the implementation of international standards under the UN CRPD. Therefore, aside from the UN CRPD Committee's oversight mechanisms, Montenegro is subject to close scrutiny by the EU regarding its progress in meeting both international and EU standards.

This report is prepared by the OSCE Office for Democratic Institutions and Human Rights (ODIHR) on the official request of the Parliament of Montenegro to conduct a disability inclusion assessment of the parliament. The recommendations provided in the report seek to improve representation of persons with disabilities in the Parliament of Montenegro and to enhance disability mainstreaming across all parliamentary functions, including representative, legislative and oversight functions. These objectives support the implementation of OSCE Human Dimension Commitments, notably the 1990 Copenhagen Document's guarantee of the right to seek political or public office without discrimination and the 1991 Moscow Document's commitment to equal opportunities for persons with disabilities to participate fully in society and decision-making, legally binding obligations under the UN CRPD, as well as the requirements arising from Montenegro's ongoing EU accession negotiations.

2. STRUCTURE: FOUR PILLARS OF A DISABILITY-INCLUSIVE PARLIAMENT

For the purposes of this report, a disability-inclusive parliament is understood as a democratic parliament that advances the full and effective participation of persons with disabilities in political and public life. This includes not only the right to vote, but also the right to stand for election and to engage meaningfully in political and public life. Disability inclusion must be embedded across parliamentary systems, structures and practices to ensure that persons with disabilities can participate on an equal basis with others. In this way, a disability-inclusive parliament reflects a broader commitment to diversity and respect for the rights of all individuals, encompassing both meaningful participation and the advancement of disability rights through all parliamentary functions.⁸

The report follows the assessment framework for disability inclusion in parliaments in the OSCE region, developed by ODIHR.⁹ It is structured around four core pillars: Representation, Lawmaking, Oversight, and Access.

⁶ Based on the overview of the situation of the rights of persons with disabilities in the EU enlargement reports on Montenegro for the period 2020–2024.

⁷ European Commission, *Commission Staff Working Document – Montenegro 2025 Report*, SWD (2025) 754 final/2, 4 November 2025, p. 48.

⁸ OSCE/ODIHR, 'Advancing Disability-Inclusive Parliaments: Assessment Methodology and Insights from the OSCE Region (2026) upcoming.

⁹ Ibid.

Disability-inclusive representation refers to the participation of persons with disabilities in political life as Members of Parliament (MPs) and as parliamentary staff, supported by an inclusive working environment and parliamentary culture within the parliamentary premises. In this report, disability-inclusive representation was assessed through interviews with MPs, focus group discussions with parliamentary staff, and representatives of organisations of persons with disabilities. Additionally, the MPs and parliamentary staff completed a questionnaire to assess the extent to which persons with disabilities are represented in parliamentary structures.

Disability-inclusive lawmaking involves the systemic mainstreaming of disability rights across all stages of the lawmaking cycle. In line with ODIHR's approach to democratic lawmaking, this includes legislative planning, drafting, public consultation, parliamentary scrutiny, adoption, publication, implementation, and post-legislative scrutiny. This further includes the use of in-house expertise, disability-impact assessments, the collection of disability-disaggregated data, and the meaningful participation of Organizations of Persons with Disabilities (OPDs) throughout the legislative process, among other measures. The extent to which the lawmaking process incorporates a disability perspective was evaluated through a desk review of internal policies and procedures of the Parliament of Montenegro, as well as through responses from MPs and parliamentary staff to the questionnaire¹⁰.

Disability-inclusive oversight refers to the capacity of Parliament to scrutinise public policies, programmes, and practices to hold the executive accountable for progress in advancing the rights of persons with disabilities and compliance with national and international obligations. This also encompasses regulatory oversight, meaning the scrutiny of draft legislation and the evaluation of the implementation and impact of adopted laws. This requires a dedicated body or other arrangement with sufficient expertise to conduct effective scrutiny across all aspects of public policy. The oversight process itself should be inclusive and accessible, ensuring the meaningful participation of persons with disabilities, including through the active involvement of OPDs. The assessment of oversight mechanisms was conducted through a desk review of relevant internal procedures and policies, and complemented by information gathered from the questionnaire completed by MPs and parliamentary staff.

Access to Parliament entails that physical infrastructure enables persons with disabilities to independently navigate parliamentary buildings, attend parliamentary sessions, and work in the institution in various capacities. It also requires that parliamentary communication channels are accessible, allowing persons with disabilities to receive timely and relevant information, and to access all documents published on the Parliament's website in accessible formats. The physical accessibility of the Parliament of Montenegro was evaluated through an on-site accessibility assessment of the building (see Annex I), while the accessibility of the parliamentary website was reviewed by a local OPD (see Annex II).

3. METHODOLOGY

This report is prepared by ODIHR at the official request of the Parliament of Montenegro and is the result of a collaborative effort between ODIHR, the Parliament of Montenegro, and the Montenegrin disability community. It was developed through a participatory approach, ensuring the meaningful involvement of key stakeholders at all stages of its design and

¹⁰ Informed by OSCE/ODIHR, '[Comprehensive Assessment Report on the Lawmaking Process in Montenegro](#)' (2024)

preparation and applies an intersectional lens, recognising that disability intersects with characteristics such as gender and age.

In July 2025, the Parliament of Montenegro established a Working Group on the accessibility of the Parliament of Montenegro for persons with disabilities (WG on Accessibility), which is coordinated by a Secretary. It aims to facilitate data collection, provide expert input, and contribute to the overall evaluation of the Parliament from a disability perspective.¹¹ The WG on Accessibility comprises MPs, parliamentary staff, representatives of the OSCE Mission in Montenegro, and representatives of OPDs.¹² In line with a participatory approach, Members of the WG on Accessibility meaningfully contributed to the ODIHR assessment process. They participated in the accessibility check of the parliamentary building, conducted the information accessibility check of the Parliament's website and social media platforms, and contributed to the research through participation in interviews and focus group discussions.

The methodology of the report is based on a socio-legal approach. It integrates desk research, legal analysis, and primary data collection through anonymous interviews, focus group discussions, and questionnaires. This approach allows for a comprehensive examination of both the normative framework and the practical implementation of disability inclusion within parliamentary processes.

The first ODIHR visit to Montenegro took place in October 2025 to introduce the ODIHR methodology for assessing disability inclusion in parliaments to the members of the WG on Accessibility and initiate the assessment process. Primary data collection and the desk review were conducted in the period of October-December 2025. The questionnaires were distributed to MPs and parliamentary staff to gather quantitative and qualitative information on representation, workplace inclusion, and institutional practices related to disability. 182 representatives of OPDs (121 women and 61 men) also completed a dedicated questionnaire. The responses were used to complement and triangulate the data obtained through interviews and focus groups. The desk review included an analysis of relevant national legislation, internal parliamentary rules and procedures, and policy documents related to disability inclusion and accessibility. This legal analysis was complemented by a review of international and regional standards and commitments of Montenegro under the OSCE, the UN CRPD frameworks, and the EU accession process.

The ODIHR in-country visit to Montenegro for data collection took place in December 2025. A total of eight semi-structured interviews were conducted with MPs from different political parties, with due consideration for gender balance and political diversity. In addition, two focus group discussions were organised: one with 10 representatives of OPDs (6 women and 4 men) and another with 11 members of parliamentary staff (8 women and 3 men) representing different departments and services. These consultations provided valuable qualitative insights into existing practices, challenges, and opportunities to improve disability inclusion in the Parliament's work. Aside from that, an on-site accessibility check of the parliamentary building, located at Bulevar Svetog Petra Cetinjskog, 10, Podgorica, was conducted. The assessment was carried out by international experts with the participation of members of the WG on Accessibility, representatives from Parliamentary staff and the city of Podgorica, as well as representatives of the OPDs. The assessment focused on physical accessibility, in

¹¹ Skupština Crne Gore, '[Working Group on the Accessibility of the Parliament of Montenegro for Persons with Disabilities](#)' (News) accessed 10 March 2026.

¹² Full composition can be viewed here: <https://api.skupstina.me/media/files/1765200432-zakljucak-za-formiranje-radna-grupa-za-procenu-pristupacnosti-skupstine-crne-gore-osobama-sa-invaliditetom.pdf>.

particular, outdoor areas, access to the building, internal navigation, and the availability of reasonable accommodations for persons with disabilities. It should not be regarded as a comprehensive accessibility audit. It is recommended that a full audit be conducted in order to obtain a detailed accessibility report in line with the national accessibility standards of Montenegro. The present assessment was based on international good practice and standards, with particular reference to those applied in the United Kingdom and Austria. The findings of this accessibility check form an integral part of the analysis presented in the report and can be found additionally in Annex I.

The findings and conclusions presented in this report are based on information collected and analysed up to 31 December 2025, which serves as the cut-off date for the assessment. It should also be noted that, in some cases, the legislation did not have an official English translation. Where possible, these limitations were addressed through available translations provided by international organisations, secondary sources, and consultations with relevant stakeholders.

4. PILLAR I: REPRESENTATION OF PERSONS WITH DISABILITIES IN PARLIAMENT

4.1. Persons with Disabilities as Members of Parliament

1. Article 45 of the Constitution of Montenegro guarantees every citizen aged 18 and above who has resided in the country for at least 2 years the right to vote and stand for election. Therefore, persons with disabilities have the right to vote and to stand for election, provided they meet these eligibility criteria.
2. Ensuring the right to vote for persons with disabilities is an essential component of a disability-inclusive parliament, as it should represent the interests of all citizens. In 2020, the Constitutional Court of Montenegro¹³ abolished the provision in the Law on Election of Councillors and Members of Parliament¹⁴ that excluded persons deprived of legal capacity from exercising their voting rights. While this development is commendable and in line with international standards, this legislative change has not yet led to improvements in the practical implementation of voting rights by persons deprived of legal capacity, as comprehensive reform of legal capacity and guardianship has not been launched. In the absence of a system of supported decision making, the voting rights of persons deprived of legal capacity cannot be exercised in practice. Moreover, under Article 101 Law on Election of Councillors and Members of the Parliament, the mandate of an MP can still be terminated before the end of a term if they are deprived of legal capacity by a court decision.
3. Discrimination in the area of political and public life is regulated by the Law on Prohibition of Discrimination of Persons with Disabilities.¹⁵ Denying, limiting or impeding the exercise of the right to vote to a person with disability, as well as the right to run for a public office, is considered an instance of discrimination under Article 25. If public authorities or local self-government bodies fail to implement regulations and measures to ensure that persons with disabilities can effectively hold public office, this also constitutes

¹³ The Decision of the Constitutional Court U-I No 23/17 Official Gazette of Montenegro, 06 November 2020.

¹⁴ Law on Election of Councillors and Members of Parliament, Official Gazette of Montenegro 004/98, 005/98, 017/98, 014/00, 018/00, Official Gazette of the Federal Republic of Yugoslavia 073/00, 009/01, 041/02, 046/02, 045/04, 048/06, 056/06, Official Gazette of Montenegro no 046/11, 014/14, 047/14, 012/16, 060/17, 010/18, 109/20 and 081/25.

¹⁵ Law on the Prohibition of Discrimination against Persons with Disabilities, Official Gazette of Montenegro 35/2015.

an act of discrimination within the meaning of Article 25. Voting rights of persons with disabilities and the procedures for their implementation are regulated by the Law on Election of Councillors and Members of Parliament. Article 68 requires that the election notification, upon request from a person with a disability, be provided in accessible formats. Further, Article 84 provides that a voter with a disability may vote with the assistance of a person of their choice, who may mark the ballot and cast the vote on *their behalf* when the polling station, information, or communication is inaccessible. This provision raises important compliance concerns. The Constitution of Montenegro guarantees the principle of secret voting via Article 45, which is a fundamental component of democratic electoral integrity. Allowing another person to mark and cast a ballot on a voter's behalf, particularly in the absence of accessible alternatives, compromises this constitutional guarantee. Similarly, this provision does not align with the UN CRPD standards, particularly Article 29, which requires states to ensure that persons with disabilities can vote independently and *in secret*, with access to the support of their choice, without undermining the confidentiality of the voting process.¹⁶ Therefore, the assistance provided should not deprive a person with disability of the right to vote by secret ballot.

4. Article 85 of the Law on Election of Councillors and Members of Parliament provides for voting 'by letter' if a person, due to disability, is unable to vote in a polling station. While it is generally a good practice to offer multiple voting options for citizens, including postal voting, this provision is formulated as a substitute voting option for voters with disabilities, thereby reinforcing the persistent lack of physical accessibility at polling stations. This provision should be further clarified and strengthened to ensure multiple options for voters with disabilities.¹⁷
5. Polling stations in Montenegro remain largely inaccessible to persons with disabilities, which limits their right to vote and to stand for election on an equal basis with others. In 2014, the Constitutional Court of Montenegro¹⁸ repealed Article 65(5) Law on Election of Councillors and Members of Parliament, which had required municipal election commissions, when designating polling stations, to take measures to facilitate access for persons with disabilities. The Court concluded that the provision fell short of international and European human rights standards on independent voting.¹⁹ It did not create the normative conditions for the full and effective participation of persons with disabilities in the exercise of the right to vote.²⁰ However, no further legislative amendments have been introduced in the Law on the Election of Councillors and Members of Parliament to regulate accessibility of polling stations.
6. During the 2023 Presidential and Early Parliamentary Elections, the ODIHR observation mission reported that more than half of the polling stations it assessed were not accessible for independent entry or use by voters with disabilities.²¹ Similar findings were documented by the Union of the Blind of Montenegro, which monitored accessibility conditions in 505 polling stations and confirmed widespread barriers.²² Although the State

¹⁶ UN CRPD Committee, 'General Comment No 1' (2014), para 45.

¹⁷ Association of Youth with Disabilities of Montenegro, 'How to Ensure Equal Participation of Persons with Disabilities in Electoral Processes' (2024)

¹⁸ Decision of the Constitutional Court of Montenegro U-I No 32/14 of 27 June 2017 Official Gazette of Montenegro 060/17.

¹⁹ ODIHR, 'ODIHR Opinion on the Law on Election of Councillors and Members of Parliament and the Law on Election of the President of Montenegro' (2025).

²⁰ Decision of the Constitutional Court of Montenegro U-I No 32/14 of 27 June 2017 Official Gazette of Montenegro 060/17 para 8.3.1.

²¹ OSCE/ODIHR, 'Presidential Election Montenegro 19 March and 2 April 2023: ODIHR Election Observation Mission Final Report' (2023).

²² European Commission, 'Montenegro 2023 Report' SWD (2023) 694 final.

Election Commission adopted several amendments to bylaws prior to the 2023 elections with the aim of improving access and the overall voting experience for persons with disabilities,²³ these commitments did not translate into observable improvements on the ground.

7. The “Strategy for the Protection of Persons with Disabilities from Discrimination and the Promotion of Equality for the Period 2022–2027” (Strategy 2027) acknowledges the need to enhance equal participation of persons with disabilities in political processes not only as voters and candidates, but also as campaign staff, observers, political activists, and elected representatives. Strategy 2027 recognises that ensuring meaningful political participation is a multifaceted challenge. Achieving full political participation of persons with disabilities is a complex task that extends beyond physical and information accessibility of the voting process. It is deeply intertwined with the socio-economic situation of persons with disabilities, the lack of educational programs, social support services, and the persistence of stereotypes and prejudice. However, the performance indicators for improving the political participation of persons with disabilities are notably narrow. They include only two actions to be implemented by 2025: 1) Introducing amendments to the Law on the Election of Councillors and Members of Parliament to provide for affirmative action measures, and 2) Conducting an analysis of the accessibility of polling stations for persons with disabilities. While both measures are valuable, they are insufficient on their own to address the full range of obstacles identified in the Strategy 2027, nor do they establish a coherent pathway for systemic change. As of December 2025, these actions have yet to be implemented.
8. The Parliament of Montenegro is unicameral and composed of 81 members, elected in 2023 for a four-year period. There is a strong consensus among the MPs, parliamentary staff, and the representatives of the OPDs that persons with disabilities are not sufficiently represented in the Parliament.
9. Neither the Parliament of Montenegro nor any independent statistical body collects data disaggregated by disability regarding MPs and parliamentary staff. According to the information provided during the ODIHR in-country expert visit, in the current 28th convocation, no MP has identified themselves as a self-advocate for the rights of persons with disabilities. Similarly, in the previous convocation, MPs with disabilities did not declare themselves as belonging to the disability community.²⁴ Disability continues to be perceived as a sensitive and predominantly private matter among both MPs and parliamentary staff. As a result, persons with disabilities may be reluctant to disclose their disability status in order to avoid drawing attention to it. This reluctance may be linked to societal stereotypes and misconceptions that persons with disabilities are less capable. Furthermore, the Parliament of Montenegro does not currently have a formal mechanism in place to provide reasonable accommodation for MPs or parliamentary staff with disabilities. The absence of such a mechanism may further demotivate disclosure.
10. Persons with disabilities who express interest in voting or running for office often face discouragement from family members, friends, and their broader community.²⁵ Such attitudes reflect persistent stereotypes and low expectations regarding the political engagement of persons with disabilities. The recently adopted Law on Financing of Political Entities and Election Campaigns²⁶ does not provide any support mechanisms for

²³ European Commission, ‘Montenegro 2022 Report’ SWD (2022) 335 final.

²⁴ UN PRPD, ‘Situational Analysis of the Rights of Persons with Disabilities in Montenegro - Country Report 2021’ (2022).

²⁵ Strategy for the Protection of Persons with Disabilities from Discrimination and the Promotion of Equality (2022-2027).

²⁶ Law on Financing of Political Entities and Election Campaigns, Official Gazette of Montenegro 81/2025.

candidates with disabilities. Under Article 8, it imposes a general obligation on political parties to ensure accessibility of work premises to persons with disabilities without specifying if budget funds can be directed towards this activity. It does not envisage financial incentives for political parties to include persons with disabilities on their party lists, direct financial support for reasonable accommodations to candidates with disabilities, or creation of a specific public fund to support candidates with disabilities, as recommended by ODIHR.²⁷ In this regard, introducing a reasonable accommodation fund could be an important support mechanism for candidates with disabilities to participate in elections,²⁸ especially given the increased state budget financing of political parties in 2025. Without affirmative actions, candidates with disabilities bear disproportionate costs in meeting accessibility needs, which discourages their participation and contributes to their continued underrepresentation.

11. In order to increase participation of underrepresented groups in the parliaments, some countries impose quotas, ‘temporary special measures to boost the political participation of under-represented groups’,²⁹ including for women, persons with disabilities, or national minorities. In Montenegro, there are currently no disability quotas or other affirmative measures in place to promote the representation of persons with disabilities in the Parliament. The views of MPs on the introduction of disability quotas are generally neutral, with a tendency toward scepticism. This scepticism is often based on the understanding that the disability quotas would work only if accompanied by comprehensive legislative reforms aimed at removing existing barriers to political participation and by affirmative measures to support candidates with disabilities throughout the electoral process. The OPDs in Montenegro are more positive about the introduction of a disability quota for candidates with disabilities and actively advocate for it.³⁰
12. Similarly, political parties in Montenegro do not apply disability quotas in their internal structures or candidate lists. Persons with disabilities tend to be more visible on candidate lists for local elections than on national-level lists. Political parties largely do not take any measures to remove structural and procedural barriers hampering greater representation of persons with disabilities at both local and national levels. Disability inclusion remains largely absent from political parties’ statutes and internal regulations. Some political parties do include disability matters in their political programmes, though often through the social rather than the human rights lens.
13. Low awareness of the rights of persons with disabilities is also present among some MPs and parliamentary staff. The Code of Ethics for Members of Parliament does not envisage provisions on the use of disability-sensitive terminology in its work. There is a consensus that there is a need for more training on disability inclusion for MPs and parliamentary staff, including the use of disability-sensitive language.
14. Overall, the representation of persons with disabilities in the Parliament of Montenegro remains limited due to the legal, structural barriers, and inaccessible environment. While formally persons with disabilities can run for public office, lack of affirmative actions, stereotypes, and prejudice in the society discourage them from doing so.

²⁷ OSCE/ODIHR, ‘Final Opinion on the Law of Montenegro on Financing of Political Entities and Election Campaigns (2024).

²⁸ Human Rights Council, ‘Equal Participation of Persons with Disabilities in Political Life: Report of the Special Rapporteur on the Rights of Persons with Disabilities, Heba Hagrass’ (2026) A/HRC/61/46.

²⁹ ODIHR, ‘Disability Quotas for Parliamentary Elections’ (2025).

³⁰ See: Union of the Blind of Montenegro, ‘Recommendations for Improving Electoral Legislation with Regard to Persons with Disabilities’ (2023); Association of Youth with Disabilities of Montenegro, ‘How to Ensure Equal Participation of Persons with Disabilities in Electoral Processes’ (2024).

4.2. Parliamentary Staff with Disabilities

15. Law on the Protection of Equality and Prohibition of Discrimination³¹ and the Law on the Prohibition of Discrimination against Persons with Disabilities³² constitute the core legal instruments ensuring non-discrimination of persons with disabilities in employment. Together with the Law on Professional Rehabilitation and Employment of Persons with Disabilities (LPR)³³ (adopted in 2008 and amended in 2025) and the Labour Law, these legislative acts form the principal legal framework governing equal opportunities for persons with disabilities in the labour market.
16. Discrimination based on disability in the workplace is prohibited in Montenegro pursuant to Article 12 Law on the Protection of Equality and Prohibition of Discrimination.
17. The LPR provides the primary regulatory framework governing employment, the adjustment of the working space, and the quota system for the employment of persons with disabilities. In particular, the quota system offers two compliance options for employers: either employing persons with disabilities in accordance with the prescribed quota or paying a special contribution to the Fund for Professional Rehabilitation and Employment of Persons with Disabilities (Fund). Article 21 LPR requires employers with more than 50 employees to ensure that at least 5 per cent of their workforce consists of persons with disabilities. Article 22 regulates the special contribution to be paid by employers who do not meet the quota requirement, which amounts to 20 per cent of the average monthly salary in Montenegro in the year preceding the payment. As a public institution financed from the state budget, the Parliament of Montenegro is also subject to this quota obligation.
18. According to the data obtained during the ODIHR in-country visit, as of 2025, the Parliament of Montenegro does not employ any civil servants or state employees with disabilities and therefore complies with the law by paying the special contribution to the Fund.
19. Article 15 LPR further regulates the procedure for the employment of persons with disabilities, distinguishing between general employment and employment ‘under special conditions’. The latter requires employers to provide appropriate ‘adjustments’ to the workplace, work processes, and job tasks for employees with disabilities. While the LPR establishes an important foundation for inclusive employment, the practical implementation of workplace ‘adjustments’ remains uneven, often due to insufficient employer capacity, lack of clear standards, and limited monitoring of compliance. Moreover, it does not address the obligation to provide ‘adjustments’ throughout the entire employment cycle, including selection and recruitment.
20. Denial of or failure to provide reasonable accommodation is recognised as a form of discrimination under Article 12 of the Law on Protection of Equality and Prohibition of Discrimination, though it does not define it. To facilitate the implementation of this provision, it is essential at the legislative level to provide a definition of this form of discrimination, specifying the scope and obligations associated with it in line with the UN CRPD requirements.³⁴ For reference, Article 2 CRPD defines ‘reasonable accommodation’ as ‘means necessary and appropriate modification and adjustments not imposing a disproportionate or undue burden, where needed in a particular case, to ensure

³¹ Law on the Protection of Equality and Prohibition of Discrimination, Official Gazette of Montenegro, No. 2/26.

³² Law on the Prohibition of Discrimination against Persons with Disabilities, Official Gazette of Montenegro 35/2015.

³³ Law on Professional Rehabilitation and Employment of Persons with Disabilities, Official Gazette of Montenegro, 49/2008, 73/2010, 39/2011 and 122/25.

³⁴ See UN CRPD Committee, ‘General Comment No 2’ (2014) paras 25-26.

to persons with disabilities the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms’.

21. The establishment of employment relationships, recruitment, and selection procedures, personnel management, rights and obligations, accountability mechanisms, and the protection of civil servants and state employees are regulated by the Law on Civil Servants and State Employees,³⁵ adopted in 2018. The law distinguishes between two categories of staff employed in state bodies: civil servants and state employees. Under the law, a civil servant is a person who has established an employment relationship with a state body to perform tasks that fulfil the competence of that body, as established by the Constitution, laws, and other regulations. A civil servant is also a person who performs IT, material-financial, accounting, and other administrative tasks in a state body. A state employee is a person who has established an employment relationship with a state body to perform auxiliary and other tasks.
22. In performing their official duties, both civil servants and state employees are not only protected from discrimination but are also prohibited from discriminating on the grounds of disability, among other grounds, in line with Article 7 Law on Civil Servants and State Employees.
23. Overall, the lack of civil servants and state employees with disabilities in the Parliament of Montenegro results from both a legal framework that does not support people with disabilities throughout the employment cycle and an inaccessible environment that prevents them from applying and working in the main legislative body. Gradually increasing the number of persons with disabilities working in Parliament to meet the 5 per cent quota is a recommended approach to comply with the UN CRPD.

5. PILLAR II: LAWMAKING

24. Democratic Lawmaking should be understood as the full legislative cycle through which laws are developed, drafted, consulted and discussed, scrutinized, amended, adopted and published, and later monitored and evaluated. In line with ODIHR’s Guidelines on Democratic Lawmaking for Better Laws, this process should be open, transparent, accessible, non-discriminatory, gender-responsive, inclusive, representative, participatory and sensitive to the needs of diverse groups in society.³⁶ Disability-inclusive lawmaking therefore requires that disability considerations are integrated from the earliest stages of policy development and legislative planning and that persons with disabilities and their representative organizations are meaningfully involved in processes concerning laws and policies that may affect them.
25. The Parliament of Montenegro does not have a formalised procedure for mainstreaming disability considerations into legislative planning, drafting, impact assessment, and post-legislative scrutiny, which is part of the oversight mechanism. In line with ODIHR guidelines, both ex ante and ex post regulatory impact assessments as well as human rights and diversity impact assessments should analyse how draft and adopted legislation affect persons with disabilities, including those with overlapping marginalised identities. No such structured integration of disability considerations currently forms part of Montenegro’s human rights impact assessment or ex post evaluation framework. Similarly, diversity-responsive budgeting, which ensures that the needs of persons with disabilities are reflected in expenditure and revenue policies, has not been systematically integrated

³⁵ Law on Civil Servants and State Employees, Official Gazette of Montenegro 02/18 (2018).

³⁶ OSCE/ODIHR, ‘[Guidelines on Democratic Lawmaking for Better Laws](#)’ (2023), para. 11 – Box 1.

- into parliamentary budget processes.³⁷ These gaps should be viewed in the context of broader challenges in Montenegro's lawmaking process identified in ODIHR's Comprehensive Assessment Report.³⁸ Disability mainstreaming should therefore be integrated into the broader reform of that process, rather than treated as a separate exercise.
26. Parliamentary committees usually consider proposals for legislation and assess their compliance with national and international standards. The Parliament of Montenegro currently has 14 standing parliamentary committees and three working groups. The Committee on Human Rights and Freedoms and the Committee on Health, Labour and Social Affairs address disability matters in their work. The Rules of Procedure of Parliament (Rules of Procedure) explicitly indicate that the Committee on Health, Labour and Social Affairs shall consider proposals for laws and other regulations in a broad spectrum of policy areas, including health care, labour relations, social welfare, disability insurance, and 'care for invalids, mothers and children'. Although disability falls within this remit, it is treated as a sub-component of wider social and labour policy rather than as a distinct area requiring focused parliamentary attention. In the current 28th convocation of the Parliament of Montenegro, the Committee on Health, Labour and Social Welfare held two sessions where issues of disability were discussed:
 - Consultative hearing concerning the petition 'Improving Living Conditions for Children and Persons with Special Needs';
 - Consideration of the Proposal for a Law on Unified Disability Assessment and the Proposal for a Law on Amendments to the Law on Professional Rehabilitation and Employment of Persons with Disabilities.
 27. The Committee on Human Rights and Freedoms has a broad mandate covering equality in social policy matters, health, education, and employment. While not explicitly indicated in the Rules of Procedure, the Committee on Human Rights and Freedoms conducts certain activities in the field of disability. For instance, in 2024 and 2025, the Committee on Human Rights and Freedoms organised a session of the Parliament for Persons with Disabilities, which was held in the Parliament of Montenegro on December 3, on the occasion of the International Day of Persons with Disabilities.
 28. However, disability-related scrutiny remains largely dependent on whether a draft law is perceived as directly concerning disability or social policy. There is no formal requirement that all parliamentary committees consider the potential impact of draft legislation on persons with disabilities within their respective fields of competence, nor is there a dedicated parliamentary mechanism or research function systematically supporting such analysis. As a result, disability considerations may be overlooked in areas that are not traditionally framed as disability-related, such as transport, digitalization, education, justice, budget, public administration, elections or emergency legislation.
 29. The Parliament of Montenegro does not have a caucus or a cross-party mechanism dedicated to the rights of persons with disabilities. The WG on Accessibility, established in 2025 for 14 months to facilitate the assessment of the Parliament of Montenegro under the present report, represents a good example of a collaborative effort between the Parliament of Montenegro and OPDs. It is essential to ensure the WG's continued work to monitor and oversee the implementation of the recommendations in this report. During the development of laws directly or indirectly concerning the rights of persons with disabilities, Montenegro is obliged to consult with and actively involve persons with disabilities in this process under Article 4(3) UN CRPD. In the OSCE region, participating States are called upon to engage in meaningful consultation with OPDs when drafting and

³⁷ OSCE/ODIHR, 'Guidelines on Democratic Lawmaking for Better Laws' (2023).

³⁸ See ODIHR, *Comprehensive Assessment Report on the Lawmaking Process in Montenegro*, 30 December 2024, Recommendation A(1); B(3); B(6); F(3); J(3)

- implementing policies and laws, ensuring their active participation in such processes.³⁹ Meaningful participation of persons with disabilities in the lawmaking process helps to analyse the full impact of the proposed law or policy and elaborate effective solutions.⁴⁰
30. OPDs in Montenegro participate in national-level policymaking and decision-making through the mechanisms established by the Decree on the Election of Representatives of Non-governmental Organisations into the Working Bodies of the State Administration Bodies and Conducting Public Consultation in Preparation of Laws and Strategies from 2018.⁴¹ The Decree provides two principal avenues for the OPDs' participation: 1) Election of the OPD representatives to governmental working bodies involved in drafting laws, strategies, and policies; 2) Conduct of public consultations during the preparation of legislative and strategic documents.
 31. While these mechanisms formally enable OPDs to contribute to legislative and policy processes, the Decree does not regulate the provision of reasonable accommodation for OPD representatives. As a result, participation is often hindered by barriers such as inaccessible meeting venues, a lack of sign language interpretation, the absence of accessible documents, or insufficient support for persons with intellectual or psychosocial disabilities. Beyond accessibility barriers, ODIHR's Comprehensive Assessment Report further notes that the modalities for NGO participation in government working bodies are overly formal and burdensome, which is particularly relevant for OPDs navigating both general administrative requirements and disability-specific barriers.⁴² This gap is inconsistent with the state's obligations under Article 29 UN CRPD, which require States Parties to ensure the effective and meaningful participation of persons with disabilities and their representative organisations, including through the provision of necessary accommodations.
 32. While MPs and parliamentary staff generally assess their engagement with OPDs positively, OPDs themselves report that involvement remains insufficient. A key concern raised by OPDs is the lack of a proactive initiative by the Parliament to involve them, as well as the absence of a systematic, structured approach to their participation. Decisions on whether to invite OPD representatives to the proceedings are often left to the discretion of individual standing committees rather than guided by clear, consistent institutional procedures. Another factor is that invitations to participate are frequently issued on short notice, which does not give OPDs adequate time to prepare. As a result, their ability to engage in meaningful and substantive discussions is limited, and in some cases, they are compelled to decline participation altogether.
 33. In addition, there is no systematic requirement to document OPD input and explain how it has been considered in the legislative process. Disability-inclusive consultation should include accessible calls for input, adequate deadlines, reasonable accommodation, publication of consultation reports, and feedback to OPDs on whether and how their proposals were reflected in the draft law.
 34. In sum, the Parliament of Montenegro does not yet have a formalised procedure to ensure that disability considerations are meaningfully mainstreamed throughout the lawmaking cycle. However, the establishment of the WG on Accessibility is an important step towards

³⁹ OSCE/ODIHR, 'Recommendations on the Rights of Persons with Disabilities to Participate in Political and Public Life in the OSCE Region (Dublin Recommendations)' (2023). Recommendation 8

⁴⁰ OSCE/ODIHR, 'Guidelines on Promoting the Political Participation of Persons with Disabilities' (2019).

⁴¹ UN PRPD, 'Situational Analysis of the Rights of Persons with Disabilities in Montenegro - Country Report 2021' (2022).

⁴² OSCE/ODIHR, 'Comprehensive Assessment Report on the Lawmaking Process in Montenegro' (2024), para 7.3 and Recommendation F

gradually improving the lawmaking process from a disability perspective and institutionalising it.

6. PILLAR III: OVERSIGHT

35. Parliamentary oversight is one of the fundamental functions of parliaments, alongside their legislative and representative roles, and constitutes an essential component of the system of checks and balances characteristic of democratic systems based on the rule of law, through which the executive is held accountable. In the lawmaking cycle, it also encompasses regulatory oversight as an important element evaluating whether adopted legislation achieves its intended aims, whether it produces unintended consequences, and whether it should be maintained, amended or repealed. Disability-inclusive oversight requires that Parliaments systematically assess how laws, budgets and public policies, programmes and practices affect persons with disabilities, including through post-legislative scrutiny and ex post evaluation. The Parliament of Montenegro does not have a formalised procedure for disability impact assessment or for mainstreaming disability considerations into draft laws, budgets, or post-legislative scrutiny. In the absence of procedures, disability-related analysis is conducted on an ad hoc basis, largely driven by the initiative of committees, MPs, or external stakeholders, reflecting a broader systemic gap in Montenegro's ex post evaluation and post-legislative scrutiny framework.
36. There is no formal body mandated to oversee disability issues in the Parliament of Montenegro. Disability matters are included in the mandate of the Committee on Human Rights and Freedoms, which performs a control and oversight function within the Parliament of Montenegro on a broad array of human rights issues. Its mandate, established by the Rules of Procedure, allows the Committee to examine draft laws, monitor the implementation of legislation, and convene hearings on issues within its competence. The Committee does not operate within a systematic or institutionalised framework for overseeing disability-related legislation or policies. As a result, its supervisory activities in the field of disability tend to be episodic rather than strategic or continuous. Periodically, when considering draft laws concerning the rights of persons with disabilities, the Committee assesses their compliance with the UN CRPD.
37. Under Article 75 Rules of Procedure, the Committee may convene a control hearing to obtain information, expert opinions, or clarification on matters related to the work of the Government or state administration, including issues affecting persons with disabilities. For instance, in 2022, the Committee held a control hearing with the representatives of the competent ministries on the topic 'Operation of day care centres for children with developmental disabilities and persons with disabilities in Montenegro'. Following the hearing, and in accordance with Article 77 Rules of Procedure, the Committee prepared a Report with Proposed Conclusions, which was unanimously adopted at its 26th session on 7 July 2022. The Conclusions were subsequently adopted by the Parliament at the Eighth Session of the First Regular (Spring) Session on 28 July 2022. On 6 November 2024, the Committee conducted another control hearing, this time with the Minister of Human and Minority Rights, the Minister of Social Welfare, Family Care and Demography, and representatives of the Ministries of Education, Science and Innovation, and Health. The hearing focused on the 'Implementation of the Recommendations contained in the Report on Post-Legislative Supervision of the Law on the Prohibition of Discrimination against Persons with Disabilities and the Conclusion of the Committee on Human Rights and Freedoms of 21 January 2021'. However, these examples do not appear to form part of a systematic post-legislative scrutiny framework with clear criteria for selecting laws for

review, structured methodology, or regular follow-up on the implementation of conclusions and recommendations.

38. Within its mandate, the Committee on Human Rights and Freedoms also examines petitions submitted by citizens and legal entities concerning the exercise and protection of their rights. This mechanism represents an important avenue for people to draw parliamentary attention to human rights violations, legislative shortcomings, or systemic barriers. However, according to information provided by the Parliament, the number of petitions and complaints specifically related to the rights of persons with disabilities is extremely limited.
39. The Committee on Health, Labour and Social Affairs plays an important role in monitoring the alignment of the national legislation with the EU acquis within its areas of competence. Its mandate includes reviewing draft legislation for compliance with EU standards and, on the basis of Government reports, overseeing the implementation of laws, particularly those establishing obligations arising from EU law. In relation to the rights of persons with disabilities, the Committee has considered a range of legislative acts that incorporate or transpose EU norms into Montenegrin legislation, however, it does not have an established procedure to track this process from a disability perspective. Such scrutiny should include assessing whether EU-derived legislation, once adopted and implemented, is consistent with the UN CRPD and relevant EU disability standards.⁴³
40. The in-house expertise on disability-inclusive oversight processes remains limited⁴⁴, which affects the capacity to integrate disability considerations into parliamentary oversight.
41. The Parliament of Montenegro has no specific regulation for receiving disability-related complaints from MPs, parliamentary staff, or temporary staff. Overall, oversight functions, including regulatory oversight, is conducted on an ad hoc basis, without a systematic approach. Therefore, establishing a dedicated subcommittee on disability rights within the Committee on Human Rights and Freedoms to ensure focused and continuous parliamentary oversight of disability-related matters could be a first step towards institutionalising this process.

7. PILLAR IV: ACCESS

42. Information accessibility is regulated under Article 12 of the Law on the Prohibition of Discrimination against Persons with Disabilities. The provision obliges public authorities and other relevant bodies to ensure that information intended for the general public is made accessible to persons with disabilities, though without specifying accessibility formats. This requirement applies to information disseminated through websites, electronic communication, print materials, and various other media. A failure to provide accessible information constitutes discrimination on the basis of disability under the law. In addition to information accessibility, the law requires public authorities to provide signage in Braille and Easy Read formats within public facilities and in all areas and spaces of public use. However, the law does not contain provisions regulating the use of sign language.
43. Montenegro remains the only country in the Western Balkans that has not yet recognised sign language as a language.⁴⁵ Existing legislation treats sign language primarily as a

⁴³ ODIHR, 'Comprehensive Assessment Report on the Lawmaking Process in Montenegro' (2024), Recommendations I(1) and J(3)

⁴⁴ Based on the data received during the OSCE/ODIHR in-country visit for data collection in December 2025.

⁴⁵ ETV Portal, '[Zvrko: Montenegro is the Only Country in the Region without a Law Guaranteeing the Right to Sign Language](#)', 22 December 2025.

support service for living in the community. Although the Ministry of Finance and Social Welfare has introduced a minimal level of standardisation,⁴⁶ there is limited availability of training for sign language interpreters and trainers,⁴⁷ and, as a consequence, Montenegro has very few sign language interpreters. For most of them, interpretation is not their primary occupation.⁴⁸ This lack affects the exercise of political rights by persons with disabilities. The Law on Election of Councillors and Members of Parliament requires the sign language interpretation only of the debates on the National Broadcast Services. Even this narrow provision has been implemented inconsistently.⁴⁹ The Strategy of Deinstitutionalisation for the Period from 2025 to 2028 with an Action Plan for 2025 recognises this problem and establishes a task to adopt legislation on sign language.

44. The sessions of the parliamentary working bodies are broadcast live on the YouTube channel of the Parliament. The national public broadcaster RTCG operates a parliamentary channel dedicated to regular parliamentary work, which rarely provides sign language interpretation.
45. The legal framework regulating voter registration mainstreams disability rights to a limited extent.⁵⁰ Under Article 68 Law on Election of Councillors and Members of Parliament, the notification about the elections must be delivered in an accessible format for voters with disabilities upon their request. However, it does not ensure the procedure for submitting a request for notification is accessible, rendering it a rather declaratory provision. In turn, the Law on the Voter's Register does not include an obligation to ensure accessibility of information on voting rights and voter registration.⁵¹
46. With regard to physical accessibility, Article 11 Law on the Prohibition of Discrimination against Persons with Disabilities recognises that failing to provide unhindered access to premises and areas used for public purposes constitutes discrimination based on disability. The Law on Spatial Planning and Facility Construction⁵² (Law on Spatial Planning), as well as the accompanying Rulebook on Detailed Conditions and Methods for Adapting Facilities for Access and Movement of Persons with Reduced Mobility and Persons with Disabilities,⁵³ regulate accessibility standards to ensure access and movement of persons with reduced mobility and persons with disabilities. Although the legislative and regulatory framework for accessibility standards is perceived as relatively high,⁵⁴ implementing them in practice remains challenging. In 2018, the Ministry of Sustainable Development and Tourism adopted an Action Plan for the Adaptation of Public Buildings for Persons with Reduced Mobility and Disabilities (2019-2020)⁵⁵ with the aim of improving the accessibility of public facilities in Podgorica, including the adaptation of the Parliament building. However, the implementation of the Action Plan resulted in limited progress in practice. While some accessibility measures have been implemented (see Note to Annex I) in the Parliament, it remains largely inaccessible.

⁴⁶ UN PRPD, 'Situational Analysis of the Rights of Persons with Disabilities in Montenegro - Country Report 2021' (2022).

⁴⁷ European Commission, 'Montenegro Report 2020' SWD (2020) 353 final.

⁴⁸ The Strategy of Deinstitutionalisation for the Period from 2025 to 2028 with an Action Plan for 2025.

⁴⁹ Association of Youth with Disabilities of Montenegro, 'How to Ensure Equal Participation of Persons with Disabilities in Electoral Processes' (2024).

⁵⁰ ODIHR, 'ODIHR Opinion on Laws Governing Voter Registration in Montenegro' (2025).

⁵¹ Association of Youth with Disabilities of Montenegro, 'How to Ensure Equal Participation of Persons with Disabilities in Electoral Processes' (2024).

⁵² Law on Spatial Planning and Facility Construction, Official Gazette of Montenegro, 064/2017.

⁵³ Rulebook on Detailed Conditions and Methods for Adapting Facilities for Access and Movement of Persons with Reduced Mobility and Persons with Disabilities, Official Gazette of Montenegro, 048/13 and 044/15.

⁵⁴ Strategy for Integration of Persons with Disabilities in Montenegro for the Period 2016–2020 (2016).

⁵⁵ UN PRPD, 'Situational Analysis of the Rights of Persons with Disabilities in Montenegro - Country Report 2021' (2022).

47. The on-site accessibility check evidenced that the building of the Parliament is largely inaccessible for persons with different types of disabilities. However, it has undertaken efforts to improve some accessibility standards.⁵⁶
48. Within the Parliament, the Sector for Legal, Personnel, Financial and General Affairs is responsible for accessibility of the parliament premises and processes, however, it does not act as an accessibility focal point, as no formal procedure exists for designating such a function.
49. The Plenary Hall of the Parliament has audio induction loops, which are helpful for persons with hearing impairment. It also has 10 infrared receivers with induction cables for listening to translations.
50. The digital accessibility of the website of the Parliament of Montenegro draws on the WCAG and EN 301-549 recommendations. The Parliament's website⁵⁷ currently uses the UserWay tool to enhance digital accessibility, enabling users to adjust certain display and functionality settings. However, as demonstrated by the accessibility assessment of the website (see Annex II), this software alone is insufficient to ensure full and effective access to information. Although the eParliament system was procured in 2021, it remains non-operational due to the fact that essential preparatory steps have not been implemented. These include the systematic organisation of parliamentary documentation, its proper structuring, and its conversion into machine-readable and searchable formats. The absence of these measures prevents the effective digitalisation of parliamentary documents and, as a result, significantly limits their accessibility on the website.
51. Access to information is a crucial element of democratic lawmaking. All documentation related to the development of laws, as well as adopted laws, should be made available to the public. Upon request, the Parliament should provide laws and essential information related to the lawmaking in Braille, large print or Easy Read formats. Legislative documents should also use disability-sensitive language, meaning that the language of legislation should avoid terminology that reinforces stereotypes or does not reflect the rights-based principles of the UN CRPD.⁵⁸ In this respect, the latest EU Accession Report for Montenegro specifically expresses concern regarding the use of terminology in Montenegrin legislation.⁵⁹
52. Internal procedures and rules regulating the procurement for the Parliament do not mainstream disability rights and do not have a requirement to purchase accessible goods and services.

⁵⁶ Further details on the results of the accessibility assessment are provided in Annex I of this report.

⁵⁷ See: <https://www.skupstina.me>.

⁵⁸ OSCE/ODIHR, 'Guidelines on Democratic Lawmaking for Better Laws' (2023).

⁵⁹ See European Commission, [Commission Staff Working Document – Montenegro 2025 Report](#), SWD(2025) 754 final/2, 4 November 2025, p. 48.

8. CONCLUSION

This report highlights both the progress made and the remaining challenges in advancing disability inclusion within the Parliament of Montenegro. By ratifying the UN CRPD, Montenegro has demonstrated its commitment to strengthen the rights of persons with disabilities. In addition, the country's commitments under the EU accession process and the OSCE Human Dimension frameworks provide a strong basis for further advancing the inclusion of persons with disabilities in political and public life.

The analysis across the four pillars of a disability-inclusive parliament: representation, lawmaking, oversight, and access suggests that while Montenegro has taken steps to strengthen the relevant legal and policy framework, further efforts are needed to address gaps affecting the full participation of persons with disabilities in parliamentary processes.

The representation of persons with disabilities as MPs remains limited. Consideration could be given to introducing affirmative actions, supported by legislative and policy reforms, to create a more enabling political environment for persons with disabilities to exercise their rights to vote and to stand for election. At the same time, persistent stereotypes and low expectations regarding the political engagement of persons with disabilities continue to influence their participation and highlight the importance of awareness-raising initiatives among the population.

The Parliament of Montenegro does not have a formalised procedure for mainstreaming disability considerations into legislative planning, drafting, impact assessment, and oversight. In this regard, the WG on accessibility can act as a driver of change and lead efforts to introduce rules and procedures to institutionalise disability-inclusive lawmaking, oversight and representation. Further strengthening consultation mechanisms with OPDs and ensuring their meaningful participation in the work of the Parliament, including throughout all stages of the legislative process and as part of its oversight functions, would increase the quality of the disability-related legislation as well as reinforce the role of the Parliament of Montenegro as an important actor in promoting equality and inclusive democratic governance.

The Parliament of Montenegro is well-positioned to further advance disability inclusion across its work. Measures aimed at strengthening institutional capacity, improving the accessibility of parliamentary premises and communication channels, and mainstreaming disability perspectives in lawmaking and oversight processes should be systemized into a comprehensive disability inclusion action plan.⁶⁰ Such a plan would enable the Parliament to set clear priorities, monitor progress, and ensure the effective allocation and use of resources. In addition, it would be advisable to develop a dedicated accessibility plan, focusing on the gradual improvement of both architectural and information accessibility of the Parliament, in line with national accessibility standards and international good practices.

⁶⁰ See Annex III. Disability Inclusion Action Plan Template.

9. RECOMMENDATIONS

Following the assessment of the Parliament of Montenegro, it is recommended that a comprehensive *disability inclusion action plan* of the Parliament be adopted. This document must be updated periodically with the progress reports published, detailing the steps taken to implement the actions. Both the disability inclusion action plan and progress reports should be publicly available online in accessible formats. The disability inclusion action plan should include clearly defined actions, indicators, a timetable for implementation, and the allocation of adequate financial resources. The development of the plan should be conducted in consultations with the OPDs and build on the findings of this assessment. It should address, inter alia, the following tasks aimed at strengthening structural and procedural frameworks:

Representation

1. **Launch a comprehensive reform of the legal framework regulating legal capacity and guardianship** in line with the recommendations of the UN CRPD Committee⁶¹ to enable voters deprived of legal capacity to exercise their voting rights in practice.
2. **Amend Article 18 Law on the Protection of Equality and Prohibition of Discrimination** to provide a definition for the concept of ‘reasonable accommodation’.
3. **Amend Article 84 Law on Election of Councillors and Members of Parliament** to ensure that persons with disabilities can vote independently and in secret.
4. **Amend the Law on Political Parties and the Law on Financing of Political Entities and Election Campaigns** to introduce incentives to promote the political participation of persons with disabilities, including through financial incentives for political parties to include persons with disabilities on their party lists, direct financial support for reasonable accommodations to candidates with disabilities, or other support mechanisms for candidates with disabilities, including through the establishment of a reasonable accommodation fund to support participation in elections.
5. **Amend the Law on Civil Servants and State Employees** to facilitate access to public service for persons with disabilities by requiring that workplace accommodations are provided throughout the employment cycle, including during recruitment and selection, in state bodies, including the Parliament of Montenegro.
6. **Assess the progress in implementing tasks under the Strategy for Protection of Persons with Disabilities from Discrimination and the Promotion of Equality for the Period 2022–2027** related to removing barriers to political participation for persons with disabilities through the Parliament’s scrutiny mechanisms.
7. **Adopt an action plan** with concrete tasks and a timeline for improving accessibility of polling stations.
8. **Work on the gradual fulfilment of 5 per cent quota for the employment of persons with disabilities** within the Parliament. This measure should be accompanied by the effective implementation of the disability inclusion action plan and the accessibility action plan, as well as improvements to recruitment and hiring procedures to eliminate barriers and ensure equal opportunities for candidates with disabilities.
9. **Establish a mechanism for disability-disaggregated data collection** to monitor and track the representation and participation of persons with disabilities within parliamentary structures and processes. This could include the data collection on the number of MPs, parliamentary staff, visitors of the Parliament with disabilities, as well

⁶¹ UN CRPD Committee, ‘Concluding observations on the initial report of Montenegro’ (2017) CRPD/C/MNE/CO/1.

as the number consultations with OPDs conducted annually. While acknowledging the challenges of collecting disability-disaggregated data due to sensitivity, stigma, and privacy concerns, it is recommended to prioritise surveys based on the standardised Washington Group Short Set of Questions,⁶² an instrument developed by the UN to assess functioning of a person. In line with guidance from the Human Rights Council,⁶³ such surveys should be conducted by independent bodies, such as national statistical commissions.

10. **Introduce clear and accessible feedback and complaint mechanism** within the Parliament for disability-related issues. Procedures for handling such feedback should be clearly defined, publicly available, and subject to regular monitoring and review.
11. **Conduct regular awareness-raising trainings on non-discrimination** for MPs and parliamentary staff, with the aim of addressing stereotypes and misconceptions about disability and promoting a rights-based understanding of disability inclusion.

Lawmaking

12. **Develop and formalize a procedure for mainstreaming disability considerations throughout the entire lawmaking cycle**, including legislative planning, drafting, ex ante regulatory impact assessment, human rights and diversity impact assessment, parliamentary scrutiny, publication of legislation, implementation monitoring and ex post evaluation. The procedure should be developed in consultation with OPDs and integrated into broader reforms of Montenegro's lawmaking process, rather than established as a separate or parallel mechanism.
13. **Strengthen in-house expertise on disability-inclusive lawmaking** by designating a staff member within the parliamentary research unit, responsible for disability-related research and advice, including support to disability-sensitive impact assessment, parliamentary scrutiny, oversight and capacity-building.
14. **Ensure a systematic, structured and accessible approach to consultations with OPDs throughout the lawmaking process**, allowing them to meaningfully participate in the drafting and scrutiny of legislation. OPDs should receive adequate notice, reasonable accommodation and feedback on how their input was considered.
15. **Ensure that legislative documents, draft laws, adopted laws and related materials are published in accessible, searchable and machine-readable formats**, with essential information available upon request in Braille, large print, audio or Easy Read.

Oversight

16. **Formalize and expand the mandate of the Committee on Human Rights and Freedoms to include disability-related matters**, ensuring focused and continuous parliamentary oversight of disability-related matters within the existing committee structure.
17. **Ensure systematic and structured approach to consultations with OPDs**, allowing them to meaningfully participate in the oversight processes.
18. **Ensure the continuous work of the WG on Accessibility**, with a formalised mandate to monitor the implementation of disability inclusion and accessibility plans.
19. **Ensure that parliamentary budget and financial oversight be disability-inclusive** and include an analysis of the entire budget and resulting impacts on the needs and

⁶² See more: <https://www.washingtongroup-disability.com/question-sets/wg-short-set-on-functioning-wg-ss/>.

⁶³ Human Rights Council, 'Equal Participation of Persons with Disabilities in Political Life: Report of the Special Rapporteur on the Rights of Persons with Disabilities, Heba Hagrass' (2026) A/HRC/61/46.

interests of individuals from different social groups, including persons with disabilities, across sectors.

Access

20. **Appoint a designated focal point within parliamentary staff responsible** for matters related to disability inclusion within parliamentary premises, including the implementation of accessibility standards, the provision of reasonable accommodations for MPs, parliamentary staff, and visitors, and receiving accessibility-related complaints and feedback, as described in recommendation 10.
21. **Allocate dedicated funding for reasonable accommodation** within the Parliament, ensuring that such measures are provided in a timely manner and do not constitute an undue burden.
22. **Ensure the full functioning of the eParliament system** in order to guarantee the accessibility of documents published on the Parliament's website. This should be accompanied by necessary improvements to the website to integrate accessibility standards into metadata, search functions, and content structure, and by ensuring that legislative documents are available in accessible formats.
23. **Conduct a comprehensive accessibility audit of the Parliament's physical infrastructure** involving dedicated national experts, representatives of the OPDs, and parliamentary staff.
24. **Adopt an accessibility action plan** that includes a list of concrete actions, allocated resources and a timeline to improve physical and information infrastructure. It should build on the findings of the architectural and information accessibility audits of the Parliament to be conducted following this assessment. This plan should align with the disability-inclusion action plan and be periodically updated.

10. Annex I: Parliamentary Accessibility (Physical Infrastructure) Checklist⁶⁴

This is a sample checklist that can be used to assess the accessibility of the physical infrastructure of parliamentary buildings. Parliaments are advised to consult local OPDs, members of the parliamentary community, staff working in facilities or building maintenance, and the working group prior to completing this checklist to see how it can be amended for the local context. If possible, parliaments should work with accessibility experts. Parliaments should consult national building regulations and international standards when conducting the audit.

Accessibility standards vary across national contexts. At the bottom of this checklist, there is a glossary for parliaments on key terms, in case national standards do not contain guidance on such topics, such as minimum width, accessible height, accessible parking space, and accessible restrooms.

Area 1: Access and Building Entrance

- X Path from the public sidewalk is step-free, continuous and unobstructed.
- ☐ Path and ramp surfaces are firm, stable and slip-resistant, with guardrails on ramps.
- ☐ Minimum width is maintained on all paths and ramps.
- ☐ Ramps meet minimum width, slope and landing requirements.
- X There are no abrupt level changes.
- ☐ At least one accessible entrance is available during working hours.
- ☐ There is accessible signage leading to the entrance.
- ☐ Accessible main entrance doors are easy to operate, preferably with automatic door openers at an accessible height. Tactile floor guidelines lead from public areas to the accessible entrance.
- ☐ There is an explanation online in simple language on how to reach the accessible main entrance.

Area 2: Parking

- ☐ There is an adequate number of accessible parking spaces available.
- ☐ Accessible parking spaces are clearly marked with signage.
- ☐ Accessible parking spaces are sufficiently wide and have dedicated access aisles.
- ☐ There are van accessible spaces and the maximum acceptable height of a vehicle is shown on the approach to the car park.
- ☐ Path from the accessible parking spaces is short, step-free, continuous and unobstructed.

Area 3: Signage

- ☐ Accessible routes around the building are clearly marked.

⁶⁴ as of 11.12.2025

- ☐ Maps or directories are available in various formats, including tactile Letters, Braille and Easy-to-Read.
- ☐ Signage and information are written in accessible fonts using mixed-case lettering.
- ☐ Rooms are labelled with tactile Letters, Braille and high-contrast visual signs.
- ☐ Tactile wall-mounted signage and information are placed at an ergonomically correct height for touching.
- ☐ Tactile Information is placed at an ergonomically correct height for touching.

Area 4: Horizontal main paths

- X Corridors meet minimum width requirements and, if not, passing passes are regularly allocated.
- ☐ Turning space is available at key intersections.
- ☐ For long corridors, seating is provided roughly every 50 m, in contrasting colours.
- ☐ Floor surfaces are firm, stable, and slip-resistant.
- ☐ Step-free access is provided throughout the building.
- ☐ Main connecting routes for visitors are equipped with tactile guidance systems.
- ☐ Walls are light-coloured, non-reflective and contrast with the floor.

Area 5: Vertical paths

- ☐ Elevators are accessible and available to access all public floors.
- ☐ Elevator buttons are at an accessible height, have tactile and Braille labels, and are tonally contrasted from the surrounding wall.
- ☐ There are audible and visual floor announcements.
- ☐ Elevators are in a contrasting colour to the surrounding wall.
- ☐ The emergency system in the elevator is accessible for persons with disabilities, including wheelchair users, and persons with visual or hearing impairments.
- ☐ If available, lifts and platform lifts have clear instructions for usage.
- ☐ A tactile and contrasting markings is used at the bottom and the top of stairs to indicate the beginning and end of the stairway.
- X Each step is identical in terms of its height and depth and complies with standards.
- ☐ Stairs are well lit and slip-resistant.
- ☐ Handrails on the stairs are equipped with tactile signs indicating the location (floor number) and an arrow pointing to the exit.

Area 6: Public Areas and Meeting Rooms

- ☐ The first information point after the entrance is connected with tactile and contrasting guidelines.
- ☐ Reception/ service counters include an accessible height section.
- ☐ Desks and tables are available at an accessible height.

- ☐ Tables and seats are tonally and colour-contrasted.
- ☐ For visitors and participants of the conference/meeting accessible seats are available, distributed equally and are not inferior to other seats.
- ☐ Entrance doors to the meeting rooms are accessible.
- X Meeting rooms have space to maneuver.
- ☐ Assistive listening systems are available in meeting rooms and reception/ service counters with clear markers.
- ☐ Room controls (for example: lights, thermostats, intercoms, card readers and security systems) are available at an accessible height, are labelled with high-contrast text and tactile/ Braille signage and can be retrofitted if required.
- ☐ Meeting room technology (for example: computers and touchscreens) complies with accessibility standards.
- ☐ Room controls are placed in the same position from floor to floor and are not blocked by furniture or signage.
- ☐ There are waste bins with clear signage in tactile lettering and Braille and can be retrofitted if required.
- ☐ If necessary, furniture, furnishings and technical equipment can be adapted easily and cost-effectively.
- ☐ Plaques next to the building's artwork contain information in tactile lettering and Braille.
- ☐ Coat racks in the building, if available, can be used by wheelchair users or persons of short stature.

Area 7: Restrooms

- ☐ At least one accessible stall is provided per restroom.
- ☐ Accessible stalls/ restrooms are indicated by a tactile sign.
- X There is at least one accessible family or gender-neutral bathroom.
- X Accessible stalls/accessible room have correct turning and transfer clearances.
- ☐ The doors of the accessible toilets open outwards.
- ☐ There are accessible stalls that provide for both right- and left-handed transfers.
- X Grabs bars are installed.
- ☐ Faucets on sinks are levers or automatic.
- X Toilet paper, sinks, coat hooks, dispensers, and dryers are at an accessible height.
- ☐ Accessible restrooms have an emergency alarm or call for assistance cord, positioned between the WC and wash basin.
- ☐ The floor, walls, door, WC, washbasin and other fittings have a good level of tonal or colour contrast.

Area 8: Lighting, Acoustics and Sensory Environment

- X Adequate, even lighting is used throughout the building.

- X Highly reflective surfaces are not used for floors or walls.
- X Fluorescent, flickering, or strobe-like lights are not in use.
- ☐ Signage and wall-mounted information has adequate lighting.
- ☐ There are acceptable noise levels and reverberation control.
- ☐ A quiet room and sensory space is available.
- X Public areas are not overstimulating, with, for example, bright colours, blinking screens, and fast-moving digital signage.

Area 9: Emergency Procedures

- ☐ The emergency evacuation procedure has been reviewed from the perspective of disability inclusion and accessibility.
- ☐ Staff are trained on how to assist persons with disabilities during an emergency.
- ☐ The posted emergency plan is available in accessible formats and in plain language.
- ☐ Emergency drills and risk assessments are inclusive and include considerations from the perspective of disability.
- ☐ Audible alarms are paired with visual strobes.
- ☐ Fire extinguishers, alarms, pull stations and first aid equipment are placed at an accessible height.
- ☐ Emergency signage is clear, high-contrast, and illuminated.
- ☐ Emergency exit doors are not heavy or difficult to operate, indicated with tactile and Braille, high-contrast signage and open outwards.
- ☐ Evacuation routes are accessible and are not blocked.
- ☐ For persons who are unable to escape via the stairs independently, there are safe meeting points that are clearly signposted and equipped with an emergency calling system (fire brigade).
- ☐ Escape filter masks are available at the waiting areas.
- ☐ Evacuation chairs are available, placed close to stairwells and staff is trained on how to use them.

Area 10: Maintenance and Operations

- ☐ Snow and ice removal plan or operations includes keeping accessible routes clear.
- ☐ Equipment, such as automatic door openers, assistive listening systems, and platform lifts, is tested regularly.
- ☐ There is a plan to ensure that meetings and other temporary set ups are accessible.
- ☐ Staff are trained on accessibility in parliamentary buildings.
- ☐ Regular testing of building accessibility is carried out with the active involvement of persons with disabilities.
- ☐ Contact information for accessibility feedback is available.
- ☐ Responsibility for accessibility in the building and in operations is defined and easily identifiable for employees.

Area 11: Outdoor Areas (if applicable)

- ☐ Paths are available that are step-free, continuous, even, and unobstructed.
- ☐ Paths comply with minimum width requirements.
- ☐ Benches are provided on even ground, with adjacent wheelchair seating space, at an accessible height and with armrests.
- ☐ Adequate lighting is available.
- ☐ There is an accessible, step-free route to the outdoor area.
- ☐ There is accessible signage to navigate around the outdoor area.

X The area is regularly maintained with attention paid to: overgrown vegetation blocking paths or signage; clearing ice, leaves and mud from accessible routes; and clearing loose stones or debris from the pathways.

NOTE

1. This note provides a brief summary of the main findings from the accessibility check of the Parliament of Montenegro conducted on 11 December 2025.
2. The accessibility check revealed that the building of the Parliament of Montenegro remains largely inaccessible and does not allow persons with various types of disabilities to enter, move within, or navigate between floors independently. At the same time, it is important to acknowledge the efforts made by the Parliament of Montenegro to improve accessibility in recent years.
3. The pedestrian path from the nearest bus stops to the main entrance, including the adjacent public sidewalks, is generally accessible for wheelchair users and is equipped with tactile paving to assist persons with visual impairment.
4. Designated on-street parking for persons with disabilities is currently secured with a locked barrier requiring a key, which prevents independent use by wheelchair users. Additionally, there is no designated, properly marked, accessible parking space within the secured area near the building's side entrance.
5. The main entrance to the Parliament building is not accessible. Due to the presence of steps and a non-accessible door design, persons using wheelchairs are unable to enter the building independently. While persons with visual impairments are able to approach the building, they cannot enter independently as the tactile paving does not lead from a public area to the entrance.
6. The entrance to the Education Centre located at the side of the building on the ground floor is not accessible, preventing children with disabilities from participating in educational activities organised by the Parliament.
7. A side entrance is currently undergoing renovation with the aim of providing accessible access. At present, this entrance is used by persons with disabilities to enter the building. It leads to a staircase equipped with a platform stairlift intended to transport wheelchair users to the first and second floors, where the parliament halls and rooms are located. However, testing of this platform demonstrated that it does not function reliably and poses potential safety risks to users. As a result, there is currently no safe and fully accessible vertical circulation route to reach the first and second floors of the building.
8. The plenary hall of the Parliament, located on the first floor, is not accessible to wheelchair users. Although the Parliament has made efforts to improve accessibility by installing a lifting platform for persons with disabilities inside the room, testing has

shown that the platform does not function properly and cannot accommodate electric wheelchairs.

9. The meeting room, located on the first floor, is accessible and can be navigated by persons with disabilities.
10. Press briefing areas located in the main corridors on the first and second floors have steps that prevent wheelchair users from accessing them.
11. Emergency evacuation routes are not consistently marked throughout the building, and publicly available evacuation maps are absent. Consequently, the accessibility of emergency exit routes could not be fully assessed.
12. Accessible toilets are available on the first and second floors. While it is technically possible for a person with disabilities to enter and use these facilities, they do not fully comply with accessibility standards. Certain deficiencies require urgent attention, for example, on the second floor, the grab rails are attached to wall tiles rather than directly to structural walls, which may create safety hazards. In addition, the accessible toilet alert systems are not functioning. The accessible toilet on the second floor was temporarily used as storage with cleaning equipment, significantly limiting free movement and safe use of the facility, due to construction work being carried out on the Parliament building involving the adaptation and renovation of the VIP entrance, aimed at improving accessibility for persons with disabilities.

Standards⁶⁵

Minimum width: A width of 2000mm should be provided on all paths, corridors and other thoroughways. This allows space for two wheelchair users to pass. If this is not feasible due to physical constraints, then 1500mm can be considered as the minimum acceptable width.

Ramp width, slope and landing requirements: Ramps should meet the minimum width requirements outlined above. The absolute maximum of a ramp gradient should be 1 in 12, but 1 in 20 is preferable. 1 in 12 gradient should not be used for longer than 2000mm. For every 1000mm of ramp, there should be a level landing to allow persons to rest. The length of the landing should be equal at least to the width of the ramp and should be covered, if outside.

Accessible entrance: Doors and entrances should have a clear width of 1200mm (900mm is the minimum acceptable). A clear level area should be allocated of at least 1500mm on each side of the doorway. Automatic doors are preferable but if manual doors are used then the handles should be of the lever type and it should be possible to open the door with minimal effort. Handles or switches should be at an accessible height. Doors and their handles should both be tonally and colour contrasted with their surroundings.

Accessible height: Mechanisms should not be more than 1200mm high or below 750mm.

Accessible parking space: An accessible parking space should be 4800mm long and 2400mm wide. 1200mm should be provided on each side as an access aisle and 1200mm provided at the rear. They should ideally be located no more than 50m from the building entrance. The surface of the parking space should be even and stable. The minimum vertical clearance in the car park should be 2600mm. Around 6% of all total parking spaces should be accessible.

⁶⁵ These guidelines are taken from [Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure](#), Department of Transport of the United Kingdom, December 2021. These are intended as indicative guidelines but national standards should be consulted above these recommendations. In the absence of national standards, parliaments may wish to consult these guidelines and other similar documents for more in-depth guidance.

Accessible restrooms: Restroom doors should be a minimum of 925mm wide. The handles should be large and easy to operate. The stall should be at least 2800mm wide and 2200mm deep. The WC should have a height of 480mm.

Tactile signage and labelling: All information should be embossed rather than engraved and raised from the surface of the sign by 1 to 1.5mm. The stroke width (of non-Braille characters) should be 1.5 to 2mm and each character should be at least 15mm in height. The preferred accessible font is sans serif. When Braille is used, grade 1 is permissible for single words but for signs with more than one word contracted grade 2 Braille must be used.

Assistive listening systems: These include hearing loops, telecoil, infrared, FM/ radio, and others.⁶⁶

Adequate lighting: Attention should be paid to ensuring that reflection is minimized through the use of non-reflective surfaces, glare is reduced by positioning lighting outside of people's range of vision and through the use of adjustable blinds on windows, and that shadows do not mask hazards. The below table provides recommendations of minimum acceptable illumination levels:⁶⁷

Location	Minimum illumination level
Accessible restrooms	100 lux
Inside elevators	100 lux
Entrances to buildings	150 lux
Corridors	150 lux
Steps and stairs	200 lux
The top and bottom of ramps	200 lux
Landing areas of elevators	200 lux
Where there is signage, maps or important information	200 lux
Ticket machines	200 lux
Reception counters	250 lux

⁶⁶ More information on assistive listening technologies can be found here: <https://ruid.org.uk/information-and-support/technology-and-products/assistive-listening-systems/>

⁶⁷ These are also taken from [Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure](#), Department of Transport of the United Kingdom, December 2021, pp. 122.

11. Annex II: Parliamentary Accessibility (Communication Infrastructure) Checklist⁶⁸

All online infrastructure should, at a minimum, comply with the Web Content Accessibility Guidelines (WCAG) Level AA.⁶⁹ Parliaments, including IT staff, are strongly encouraged to familiarize themselves with these and other guidelines before conducting a communications accessibility audit.⁷⁰ The Web Accessibility Evaluation Tools (WAVE) is an excellent resource that parliaments can also use.⁷¹

Throughout this checklist, "accessible" refers to the four pillars of web accessibility according to the WCAG guidelines: perceivable, operable, understandable, and robust.

Area 1: Websites

- X The website has a clear overview using proper HTML headings (H1-H6).
- X The website has consistent navigation on all pages and predictable layouts.
- ☐ There are multiple ways to navigate the website besides the search box, such as a sitemap.
- X. The text is discernible and readable, using high-contrast colors.
- X The content is usable when magnified or zoomed to a high level (for example: 400%).
- X. Visual elements have high contrast.
- X. Headings are clear and pages do not duplicate headings.
- ☐ Skip-to-content links are available and functional.
- ☐ Breadcrumb navigation is available and functional.
- ☐ Hyperlinks have clear and descriptive text (for example: "Download report" instead of "Click here").
- ☐ Instructions are properly formatted to be accessible to persons with visual impairments (for example: not "Click the round button" or "Click the red button").
- X Interactive elements (such as links, buttons, and form input fields) are large enough and well-spaced.
- ☐ All features are keyboard-only.
- ☐ Visible focus indicators are available.
- ☐ There are no traps for keyboard users.
- ☐ Screen reader compatibility is regularly tested.
- ☐ Accessible Rich Internet Applications (ARIA) roles and attributes are used appropriately and do not interfere with accessibility.
- ☐ Error messages are clear and accessible.
- ☐ Users can disable animated or moving content.

⁶⁸ as of 11.12.2025

⁶⁹ [Web Content Accessibility Guidelines \(WCAG\) 2.1: A W3C Recommendation](#), World Wide Web Consortium, May 6, 2025.

⁷⁰ The UK Government has also published detailed guidance on conducting a basic accessibility check if a more detailed one is not possible: <https://www.gov.uk/government/publications/doing-a-basic-accessibility-check-if-you-cant-do-a-detailed-one/doing-a-basic-accessibility-check-if-you-cant-do-a-detailed-one>.

⁷¹ WebAIM, Utah State University: <https://wave.webaim.org>.

- ☐ There is a help button located in the same place on all pages.

Area 2: Documents and publications (PDF, Word/HTML reports)

- ☐ Documents and publications have descriptive titles that clearly explain what they are.
- ☐ The content is in the correct reading order to support screen readers.
- ☐ Tables are accessible with headers and captions to support screen readers.
- ☐ Headings are written using built-in styles and are properly marked up, instead of manually styling text to create a navigable structure for screen readers.
- ☐ Headings are clear and pages do not duplicate headings.
- ☐ Alt text is provided for images, charts, and other visual content.
- ☐ Images do not contain text (except for logos or brand names).
- ☐ Bookmarks are provided in long documents.
- ☐ The text is selectable, not scanned or just an image.
- X Hyperlinks have clear and descriptive text (for example: "Download report" instead of "Click here").
- ☐ Accessible templates are used consistently.
- ☐ All documents are regularly tested for compatibility with screen readers.
- X The text is discernible and readable, including when magnified or zoomed.

Area 3: Video Communications (live video)

- ☐ Live captions are available.
- ☐ Caption accuracy is monitored.
- ☐ The subtitle text has high contrast against the background and is legible.
- ☐ Sign language interpretation is provided.
- ☐ High-contrast visual displays are used.

Area 4: Video Communications (pre-recorded video)

- ☐ Closed captioning is available and accurate.
- ☐ The caption text has high contrast against the background and is legible.
- ☐ Transcripts are available.
- ☐ Audio description is available for key information.
- X Keyboard player controls are accessible.
- ☐ Content with flashing above safety thresholds is not used, and if it is used, a warning is displayed at the beginning of the video.

Area 5: Social Media

- ☐ Alternative text has been added to the images.
- X Images do not contain text (except for logos or brand names).
- ☐ Words within hashtags are capitalized (for example: #HumanRightsCommittee).

- X Images are posted with an accompanying description.
- X The description is obtained through alt text.
- X Published videos include readable and accurate descriptions.
- ☐ Automatic sound playback is not used.
- ☐ Links to documents direct users to an accessible version.
- ☐ Shortened URLs are not used without context.
- ☐ High-contrast visuals are used.

Area 6: Online Public Engagement Tools⁷²

- ☐ Instructions are available in clear language.
- ☐ The tools are fully keyboard-navigable.
- ☐ CAPTCHA alternatives are offered.
- ☐ Form labels clearly state the information the user needs to enter.
- ☐ Online forms have labels that are correctly associated with form fields to support assistive technologies.
- ☐ Form elements are consistent across all forms.
- ☐ Error messages are specific, accessible, and explain to the user how to correct the error.
- ☐ Time limits are adjustable or removable.
- ☐ Users can review their answers before submitting the form.

Area 7: Readability

- ☐ Plain language versions are available for important announcements and key content.
- ☐ Summaries are provided for long parliamentary documents.
- ☐ Jargon is avoided or explained.
- ☐ Consistent terminology is used in all parliamentary communications.
- ☐ High-contrast visuals are used in all communications.

Area 8: Warnings and Notices

- ☐ Text notifications are available.
- ☐ RSS feeds or email subscriptions are available.
- ☐ Emergency or urgent notifications are available.

Area 9: Maintenance and Operations

- ☐ The Parliament's accessibility statement is published and is up to date.
- ☐ Contact information for feedback on accessibility is available.

⁷² Such as petitions, surveys, submissions to committees, and public consultations.

- ☐ The Parliament's communication infrastructure is regularly tested for accessibility, including user testing with persons with disabilities.
- ☐ Staff is trained to create accessible content.
- ☐ There is a plan to ensure the accessibility of online events.
- ☐ Procurement requires compliance with digital accessibility.

NOTE

1. The communication infrastructure checklist was completed by the representatives of the Montenegrin disability community. An analysis of the website of the Parliament (<https://www.skupstina.me>), its official Facebook page (<https://www.facebook.com/skupstinacg>), and the Parliament's YouTube channel of the Parliament (<https://www.youtube.com/@SkupstinaCrneGore>) was conducted in order to assess the level of information accessibility. This review does not constitute a comprehensive accessibility audit. Therefore, it is recommended that a full accessibility audit be conducted to support the development of targeted measures for improvement.
2. The level of information accessibility of the Parliament's website and social media platforms can be characterised as partial. While efforts have been made to improve accessibility, several gaps remain that require further attention.
3. Even though the website generally provides consistent navigation across pages and predictable layouts, some links in the navigation area do not respond to keyboard commands, creating traps for keyboard users. These issues mainly relate to the dropdown menus. Additionally, some links are not clearly identified, particularly those that open documents or redirect users to social media channels in the page header.
4. Documents uploaded on the website are frequently provided as scanned files, and accessible document formats are not generated during the scanning process. Furthermore, PDF documents do not include tags, which limits their usability for screen reader users.
5. Video materials do not include subtitles, transcripts, or closed captions. However, as these videos are hosted on the Parliament's official YouTube channel, the keyboard player controls are accessible.
6. Accessibility instructions for using online public engagement tools are not available to users on the website. General guidance is provided in the accessibility section, which redirects users to the external platform userway.org. This platform is available only in English.
7. Alternative text for images on the Parliament's Facebook page is present but not consistently. In general, there is no established practice of including image descriptions within the accompanying publication text.

12. Annex III: Disability Inclusion Action Plan Template

Pillar	Action	Responsible Body	Timeline	Indicator of Progress	Resources Required	Status
Representation						
Lawmaking						
Oversight						
Access						