

**Factsheet on the Croatian Independent Monitoring Mechanism (iMM)  
prepared for the Council of Europe NFPs thematic session on iMMs (30/01/2026)**

| WHAT IT IS   | WHAT IT DOES   |
|--|--|
| A national, impartial, independent and expert mechanism that monitors actions of police officers of the Ministry of the Interior (MoI) in border surveillance, irregular migration and international protection. | Builds an evidence base through random and unannounced on-the-spot checks, document and data review, and interviews; issues recommendations to strengthen safeguards and respect for fundamental rights. |

### 1) Croatian iMM as a practical model

- Operational since early June 2021, operations and methodology consolidated in 2025.
- Civil-society-led and independent from the MoI for experts, missions, findings and recommendations.
- Regular, as a rule unannounced field presence (green border, border crossings, police stations, reception facilities, airports/ports).
- Built-in multi-layer quality and accountability: iMM monitors, fact-checking iMM office, coordinating iMM expert body, external expert advisory board, exchange with MoI and [public reports](#).

### 2) Legal basis and mandate ([published](#))

- Established via cooperation agreements concluded pursuant to Article 5(7) of Croatia's State Border Surveillance Act (Official Gazette 83/13, 27/16, 114/22, 151/22).
- Mandate: monitor MoI police actions with emphasis on non-refoulement, prohibition of collective expulsion, and prohibition of torture/ill-treatment.
- Not a complaints or internal affairs body, but iMM reports irregularities to launch investigations; its role is oversight and evidence-based recommendations alongside existing national complaints bodies.

### 3) Structure that supports independence; informal exchange of experience

- Coordination Board (experts representing 5 civil society organisations + 1 academic expert) manages iMM and operates autonomously from the MoI (especially for missions, findings and recommendations).
- Monitoring Team: 2 experts from each participating CSO; monitors have 'investigative initiative' and produce monitoring reports independent from the Coordination Board.
- Advisory Board provides expert guidance (e.g., Frontex FRO), informal exchange of experience with expert bodies (e.g., CPT and Greek National Commission for Human Rights)

### 4) How monitoring works (methods & outputs)

- Direct oversight (in vivo): random and unannounced (and where required, announced) on-the-spot checks, facility inspections, and 'shadowing' of police actions.
- Indirect oversight: case file review, analysis of data from the MoI information system, review of General Police Directorate materials related to alleged unlawful actions, input via mailbox/contact form.
- Interviews: with migrants/applicants for international protection; conducted systematically as of 2025 with informed consent and a do-no-harm approach.



- Reporting: findings and recommendations are published in reports; from 2025, recommendations are also communicated to the Mol after each monitoring mission.

## 5) Consolidation of methodology and funding is reflected in monitoring activity over time

Monitoring activity in numbers; counting unit: observations → mission days/operations

| Period                            | Missions/Days | Operations | Changing Counting Units (Consolidated in 2025)                             |
|-----------------------------------|---------------|------------|--|
| <a href="#">06/2021–12/2021</a>   | 8             | —          | 8 observations (6 unannounced)   |
| <a href="#">01/2022–06/2022</a>   | 12            | —          | 12 observations  |
| <a href="#">06/2023–12/2023</a>   | 8             | —          | 53 observations (43 unannounced); 20 locations                             |
| <a href="#">01/2025-06/2025</a>   | 25            | 100        | 74 locations (incl. 21 green-border checks); 26 migrant interviews         |
| <b><a href="#">2025 total</a></b> | <b>53</b>     | <b>204</b> | <b>152 locations (incl. 49 green-border checks); 52 migrant interviews</b> |

**Funding & performance:** Due to stability and increase in IMM funding for 2025, monitoring operations intensified significantly – 150% increase in the first half of 2025 when compared to the earlier periods (06/2021-12/2024), while accounting for different time spans of IMM being operational. The 2025 scale-up illustrates how meaningful, reliable funding combined with adequate administrative/logistical support and leadership commitment enables sustained results and a weekly presence of IMM monitors (average).

## 6) Key lessons learned / takeaways for states setting up IMMs

- Secure meaningful, reliable funding early—paired with professional administrative and logistical support - so monitors can sustain frequent, unannounced field presence.
- Design a multi-layer set-up with quality checks (e.g., independent coordination, expert monitor teams, external advisory layer, transparency) and workable links to national authorities for reporting.
- Plan for sustainability (staffing continuity, training cycles, operational planning).
- Invest in methodology: structured sampling, consistent documentation, and analysis frameworks that allow trend monitoring and credible evidence-based recommendations.
- Treat interviews as a core method (with informed consent and respect for do-no-harm principle): they complement documents and observation by capturing lived experience and operational realities.
- Ensure instant/timely communication of recommendations in the filed/on-the-spot, after each mission, and annually, aiming at continuous dialogue and expert exchange.
- Provide practical monitoring training that aligns human-rights safeguards with real police tactics and operational modus operandi—so monitors know what/where to look for and recommendations are implementable.
- Data protection safeguards and handling/sharing of restricted/confidential information (security clearance) may create tensions in view of reporting/investigations.

### Public sources & contacts

Website: [www.nmn.hr](http://www.nmn.hr) (Croatian / English)

IMM Office: [nmn@nmn.hr](mailto:nmn@nmn.hr)

IMM Coordination Board: [koordinacija@nmn.hr](mailto:koordinacija@nmn.hr)

Head of IMM: [anna.kalac@nmn.hr](mailto:anna.kalac@nmn.hr)

