

**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)
06/2021–12/2021	8	—	8 observations (6 unannounced)
01/2022–06/2022	12	—	12 observations
06/2023–12/2023	8	—	53 observations (43 unannounced); 20 locations
01/2025-06/2025	25	100	74 locations (incl. 21 green-border checks); 26 migrant interviews
2025 total	53	202	150 locations (incl. 48 green-border checks); 52 migrant interviews

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

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