

UPDATE ON 2024

CROATIA



# COUNTRY REPORT

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## Acknowledgements & Methodology

This report was written by Lana Tučkorić at the Croatian Law Centre and was edited by ECRE. The temporary protection annex to the report was written by Lucija Koren and Dora Palić.

This report draws on information gathered through the practice of the Croatian Law Centre, data and information provided by Administrative Courts, the High Administrative Court, the Croatian Employment Service, Office for Human Rights and the Rights of National Minorities, City of Zagreb, IOM, UNHCR, UNICEF, attorneys at law and relevant organisations, including the Are you Syrious, Borders:none, Croatian Red Cross, the Centre for Peace Studies, Civil Rights Project Sisak, Centre for Missing and Exploited Children Croatia, Doctors of the World (MdM), Jesuit Refugee Service, Society for Psychological Assistance, SVOJA association, as well as from other publicly available sources.

The 2024 update to the AIDA country report on Croatia was shared with the Ministry of Interior to provide an opportunity for comments.

The information in this report is up-to-date as of 31 December 2024, unless otherwise stated.

## The Asylum Information Database (AIDA)

The Asylum Information Database (AIDA) is managed by the European Council on Refugees and Exiles (ECRE). It aims to provide up-to date information on asylum practice in 25 countries. This includes 19 EU Member States (AT, BE, BG, CY, DE, ES, FR, GR, HR, HU, IE, IT, MT, NL, PL, PT, RO, SE, SI) and 6 non-EU countries (Egypt, Serbia, Switzerland, Türkiye, Ukraine and the United Kingdom) which is accessible to researchers, advocates, legal practitioners and the general public through the dedicated website [www.asylumineurope.org](http://www.asylumineurope.org). The database also seeks to promote the implementation and transposition of EU asylum legislation reflecting the highest possible standards of protection in line with international refugee and human rights law and based on best practice.



This report is part of the Asylum Information Database (AIDA), funded by the European Union's Asylum, Migration and Integration Fund (AMIF) and ECRE. The contents of this report are the sole responsibility of ECRE and can in no way be taken to reflect the views of the European Commission.



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## Glossary & List of Abbreviations

<b>Asylee</b>	Person granted refugee status
<b>Dismissal</b>	An application is qualified as inadmissible and not considered on substantive ground
<b>Reception Centre for Foreigners</b>	Pre-removal detention centre
<b>CES</b>	Croatian Employment Service   Hrvatski zavod za zapošljavanje
<b>CJEU</b>	Court of Justice of the European Union
<b>CPS</b>	Centre for Peace Studies   Centar za mirovne studije
<b>CRC</b>	Croatian Red Cross   Hrvatski crveni križ
<b>EASO</b>	European Asylum Support Office
<b>ECHR</b>	European Convention on Human Rights
<b>ECtHR</b>	European Court of Human Rights
<b>EUAA</b>	European Union Agency for Asylum
<b>IOM</b>	International Organisation for Migration
<b>JRS</b>	Jesuit Refugee Service   Isusovačka služba za izbjeglice
<b>LGBTI</b>	Lesbian, gay, bisexual, transsexual and intersex
<b>LITP</b>	Law on International and Temporary Protection   Zakon o međunarodnoj i privremenoj zaštiti
<b>MdM</b>	Doctors of the World   Médecins du Monde/Liječnici svijeta
<b>OIB</b>	Personal Identification Number   Osobni identifikacijski broj
<b>SGBV</b>	Sexual and gender-based violence
<b>SPA</b>	Society for Psychological Assistance   Društvo za psihološku pomoć
<b>UNHCR</b>	United Nations High Commissioner for Refugees
<b>UNICEF</b>	United Nations Children Fund

## Statistics

### Overview of statistical practice

#### Applications and granting of protection status at first instance: figures for 2024 (1)

Limited asylum statistics for 2024 can be found on the website of the Ministry of Interior (MOI).<sup>1</sup> However, publicly available statistics on a breakdown on the outcome of the procedure are not available. In 2024, 26,776 persons expressed their intention to apply for international protection (i.e., made an application for international protection) (19,907 male, 6,869 female).<sup>2</sup> The top 10 countries were: Syria (7,560), Türkiye (5,759), Russian Federation (4,057), Afghanistan (2,293), Egypt (832), Pakistan (761), Morocco (733), Iraq (712), Bangladesh (659), and India (539). However, out of the total number of applicants, the Ministry of Interior reports that only 1,307 applications for international protection were then lodged.

In 2024, a total of 359 international protection applications were decided *in meritum*. In total, 279 cases were rejected. International protection was granted to 80 persons: 71 refugee status (of whom 19 men, 20 boys, 13 women and 19 girls); 9 subsidiary protection (of whom 3 men, 3 boys, 2 women, and 1 girl).<sup>3</sup>

According to the 2024 Ombudswoman report, statistics, in terms of lodged applications, are slightly different, as out of a total of 26,776 expressed intentions, it is stated that 1,419 applications for international protection were finally lodged.<sup>4</sup> The procedure for 15,338 applications for international protection was suspended (regardless of the year of submission of the application), which is in line with the trend in the past few years.<sup>5</sup>

	Applicants in 2024 (2)	Pending at end of 2024	Total decisions in 2024	Total in merit decisions	Total rejection	In merit rejection	Refugee status	Subsidiary protection	Humanitarian protection (3)
<b>Total</b>	26,776	N/A	N/A	359		279	71	9	N/A

Breakdown by countries of origin of the total numbers of the top ten nationalities with the highest number of applications

Syria	7,560	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Türkiye	5,759	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

<sup>1</sup> Ministry of Interior, Statistics 2024, available at: <https://mup.gov.hr/UserDocsImages/statistika/2025/1/Statistika%20medjunarodna%20zastita%202024.xlsx>.

<sup>2</sup> In terms of Croatian legislation making an application is called "expressing the intention to submit/lodge application for international protection".

<sup>3</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).

<sup>4</sup> Note that there is a discrepancy of 112 applications lodged between those reported by the MOI (1,307) and those reported by the Ombudsperson (1,419). It has not been disclosed where this discrepancy comes from.

<sup>5</sup> Ombudswoman: Report of the Ombudswoman for 2024, page 268, available at: <https://www.ombudsman.hr/hr/download/izvje-e-pu-ke-pravobraniteljice-za-2024-godinu/?wpdmdl=20339&refresh=67efca50785f31743768144/>.

Russian Federation	4,057	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Afghanistan	2,293	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Egypt	832	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Pakistan	761	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Morocco	733	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Iraq	712	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Bangladesh	659	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
India	539	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Note 1: statistics on applicants and pending applications concern people, including children and dependents. The rest of the columns concern number of decisions as that is usually the (only) data available.

Note 2: "Applicants in year" refers to the total number of applicants, and not only to first-time applicants.

Note 3: Croatian asylum legislation does not foresee the possibility for asylum authorities to issue humanitarian protection decisions. However, the Law on Foreigners allows for the recognition of temporary stay on humanitarian grounds.

#### Gender/age breakdown of the total number of applicants: 2024

	Men	Women
<b>Number</b>	19,907	6,869
<b>Percentage</b>	74.3%	25.7%

	Adults	Children	
		Accompanied	Unaccompanied
<b>Number</b>			1,980
<b>Percentage</b>			7.4%

Source: Ministry of Interior, Statistics 2024, available at: <https://mup.gov.hr/UserDocsImages/statistika/2025/1/Statistika%20medjunarodna%20zastita%202024.xlsx>;

Note: The gender breakdown (Men/Women) applies to all applicants, not only adults.



## First instance and appeal decision rates: 2024

It should be noted that, during the same year, the first instance and appeal authorities handle different caseloads. Thus, the decisions below do not concern the same applicants.

	First instance		Lawsuit	
	Number	Percentage	Number <sup>6</sup>	Percentage
<b>Total number of decisions</b>	N/A	N/A	179	
Positive decisions	80	N/A	3	1%
• <i>Refugee status</i>	71	N/A	2	1%
• <i>Subsidiary protection</i>	9	N/A	1	0%
Negative decisions	N/A	N/A	145	81%

Source: Ministry of Interior, Statistics 2024, available at: <https://mup.gov.hr/UserDocsImages/statistika/2025/1/Statistika%20medjunarodna%20zastita%202024.xlsx>; Administrative Court of Zagreb, 17 January 2025; Administrative Court of Osijek, 27, January 2025; Administrative Court of Rijeka, 31 January 2025; Administrative Court of Split, 31 January 2025.

<sup>6</sup> The table includes the total number of decisions issued by administrative courts in 2024, as well as only selected types of decisions (i.e., judgments granting international protection and judgments on rejection *in meritum*). As a result, there is a discrepancy between the total number of decisions and the number of decisions broken down in this table.

## Overview of the legal framework

### Main legislative acts relevant to asylum procedures, reception conditions, detention and content of protection

Title (EN)	Original Title (HR)	Abbreviation	Web Link
<p>Law on International and Temporary Protection Official Gazette 70/2015</p> <p><i>Amended:</i> Official Gazette 127/2017</p> <p><i>Amended:</i> Official Gazette 33/2023</p> <p><i>Amended:</i> Official Gazette 17/2025</p>	<p>Zakon o međunarodnoj i privremenoj zaštiti NN 70/2015, 127/2017, 33/2023, 17/2025</p>	<p>LITP</p>	<p><a href="http://bit.ly/1hlaq3Q">http://bit.ly/1hlaq3Q</a> (HR)</p> <p><a href="https://bit.ly/2pPntru">https://bit.ly/2pPntru</a> (HR)</p> <p><a href="https://bit.ly/43iu0Mc">https://bit.ly/43iu0Mc</a> (HR)</p> <p><a href="https://narodne-novine.nn.hr/clanci/sluzbeni/full/2025_02_17_161.html">https://narodne-novine.nn.hr/clanci/sluzbeni/full/2025_02_17_161.html</a></p>
<p>Law on General Administrative Procedure Official Gazette 47/2009</p> <p><i>Amended:</i> Official Gazette 110/2021 (in force since 1 January 2022)</p>	<p>Zakon o općem upravnom postupku NN 47/2009, 110/2021</p>	<p>Law on General Administrative Procedure</p>	<p><a href="http://bit.ly/1J7BRAh">http://bit.ly/1J7BRAh</a> (HR)</p> <p><a href="https://bit.ly/36ZLaFZ">https://bit.ly/36ZLaFZ</a> (HR)</p>
<p>Law on Administrative Disputes Official Gazette 20/2010</p> <p><i>Amended:</i> Official Gazette 143/2012</p> <p><i>Amended:</i> Official Gazette 152/2014</p> <p>Decision of the Constitutional Court of the Republic of Croatia U-I-2753/2012 and others, September 27. 2016., Official Gazette 94/2016</p> <p><i>Amended:</i> Official Gazette 29/2017</p> <p><i>Amended:</i> Official Gazette 110/2021</p> <p>New Law on Administrative Disputes entered into force on July 1, 2024, Official Gazette 36/2024</p>	<p>Zakon o upravnim sporovima NN 20/2010, 143/2012, 152/2014, 94/2016, 29/2017, 110/2021</p> <p>Zakon o upravnim sporovima NN 36/2024</p>	<p>Law on Administrative Disputes</p>	<p><a href="http://bit.ly/1Gm4uTj">http://bit.ly/1Gm4uTj</a> (HR)</p> <p><a href="http://bit.ly/1K1I8fv">http://bit.ly/1K1I8fv</a> (HR)</p> <p><a href="http://bit.ly/1Bs4ZiO">http://bit.ly/1Bs4ZiO</a> (HR)</p> <p><a href="https://bit.ly/2uyfHXR">https://bit.ly/2uyfHXR</a> (HR)</p> <p><a href="https://bit.ly/2pWu82v">https://bit.ly/2pWu82v</a> (HR)</p> <p><a href="https://bit.ly/3LXKHn4">https://bit.ly/3LXKHn4</a> (HR)</p> <p><a href="https://bit.ly/3VnLPql">https://bit.ly/3VnLPql</a> (HR)</p>

Law on Foreigners, Official Gazette 133/2020 <i>Amended:</i> Official Gazette 114/2022 <i>Amended:</i> Official Gazette 151/2022 <i>Amended:</i> Official Gazette 40/2025	Zakon o strancima NN 133/2020, 114/2022, 151/2022, 40/2025	Law on Foreigners	<a href="https://bit.ly/2OLg8ZC">https://bit.ly/2OLg8ZC</a> (HR)  <a href="http://bit.ly/3IGAZ0z">http://bit.ly/3IGAZ0z</a> (HR) <a href="http://bit.ly/3LOEeOf">http://bit.ly/3LOEeOf</a> (HR) <a href="https://narodne-novine.nn.hr/clanci/sluzbeni/full/2025_03_40_545.html">https://narodne-novine.nn.hr/clanci/sluzbeni/full/2025_03_40_545.html</a>
Law on Compulsory Health Insurance and Health Care for Foreigners in the Republic of Croatia Official Gazette 80/2013 <i>Amended:</i> Official Gazette 15/2018 <i>Amended:</i> Official Gazette 26/2021 <i>Amended:</i> Official Gazette 46/2022	Zakon o obveznom zdravstvenom osiguranju i zdravstvenoj zaštiti stranaca u Republici Hrvatskoj NN 80/2013, 15/2018, 26/2021, 46/2022	Law on Compulsory Health Insurance and Health Care	<a href="http://bit.ly/1Gm4KSp">http://bit.ly/1Gm4KSp</a> (HR)  <a href="https://bit.ly/2uzuZLN">https://bit.ly/2uzuZLN</a> (HR) <a href="https://bit.ly/3uJOYI6">https://bit.ly/3uJOYI6</a> (HR) <a href="http://bit.ly/3lJaYxE">http://bit.ly/3lJaYxE</a> (HR)
Law on Free Legal Aid Official Gazette 143/2013 <i>Amended:</i> Official Gazette 98/2019	Zakon o besplatnoj pravnoj pomoći NN 143/2013, 98/2019	Law on Free Legal Aid	<a href="http://bit.ly/1lojGRf">http://bit.ly/1lojGRf</a> (HR)  <a href="https://bit.ly/3bDiHD5">https://bit.ly/3bDiHD5</a> (HR)

**Main implementing decrees and administrative guidelines and regulations relevant to asylum procedures, reception conditions, detention and content of protection**

Title (EN)	Original Title (HR)	Abbreviation	Web Link
Ordinance on the forms and data collection in the procedure for international and temporary protection Official Gazette 85/2016 <i>Amended:</i> Official Gazette 80/2024	Pravilnik o obrascima i zbirkama podataka u postupku odobrenja međunarodne i privremene zaštite NN 85/2016, 80/2024	Ordinance on Forms	<a href="http://bit.ly/2lndEjr">http://bit.ly/2lndEjr</a> (HR)  <a href="https://narodne-novine.nn.hr/clanci/sluzbeni/2024_07_80_1364.html">https://narodne-novine.nn.hr/clanci/sluzbeni/2024_07_80_1364.html</a>
Decision on the amount of financial assistance provided to applicants for international protection Official Gazette 135/2015	Odluka o visini novčane pomoći tražiteljima međunarodne zaštite NN 135/2015, 155/2022, 117/2023	Decision on Financial Assistance	<a href="http://bit.ly/2lQKkmi">http://bit.ly/2lQKkmi</a> (HR)

<i>Amended:</i> Official Gazette 155/2022 <i>Amended:</i> Official Gazette 117/2023			<a href="http://bit.ly/3z7hTnn">http://bit.ly/3z7hTnn</a> (HR) <a href="https://bit.ly/3zyZ3cF">https://bit.ly/3zyZ3cF</a> (HR)
Ordinance on the realisation of material reception conditions Official Gazette 135/2015 <i>Amended:</i> Official Gazette 61/2019	Pravilnik o ostvarivanju materijalnih uvjeta prihvata NN 135/2015, 61/2019	Ordinance on Material Reception Conditions	<a href="http://bit.ly/2lYZIsM">http://bit.ly/2lYZIsM</a> (HR)  <a href="https://bit.ly/3bxCHa9">https://bit.ly/3bxCHa9</a> (HR)
Ordinance on the content of the medical examination of asylum seekers, asylees and foreigners under subsidiary protection Official Gazette 39/2008	Pravilnik o sadržaju zdravstvenog pregleda tražitelja azila, azilanata, stranaca pod privremenom zaštitom i stranaca pod supsidijarnom zaštitom NN 39/2008	Ordinance on Medical Examination	<a href="http://bit.ly/1K1I9zT">http://bit.ly/1K1I9zT</a> (HR)
Ordinance on health care standards for applicants for international protection and foreigners under temporary protection Official Gazette 28/2020	Pravilnik o standardima zdravstvene zaštite tražitelja međunarodne zaštite i stranca pod privremenom zaštitom NN 28/2020	Ordinance on health care standards	<a href="https://bit.ly/3sbArNC">https://bit.ly/3sbArNC</a> (HR)
Ordinance on the manner of implementing the programme and tests of knowledge of asylum seekers, asylees, foreigners under temporary protection and foreigners under subsidiary protection, for the purpose of joining the education system of the Republic of Croatia Official Gazette 89/2008	Pravilnik o načinu provođenja programa i provjeri znanja tražitelja azila, azilanata, stranaca pod privremenom zaštitom i stranaca pod supsidijarnom zaštitom, radi pristupa obrazovnom sustavu Republike Hrvatske NN 89/2008	Ordinance on Knowledge Tests	<a href="http://bit.ly/1Gm5yGG">http://bit.ly/1Gm5yGG</a> (HR)
Decision on the Programme of Croatian language, history and culture for asylum seekers and asylees Official Gazette 129/2009	Odluka o programu hrvatskog jezika, povijesti i kulture za tražitelje azila i azilante NN 129/2009	Decision on Croatian Language Programme	<a href="http://bit.ly/1SuZQLq">http://bit.ly/1SuZQLq</a> (HR)
Decision on the Programme of Croatian language, history and culture for asylees and foreigners under subsidiary protection for inclusion into Croatian Society Official Gazette 154/2014	Odluka o programu učenja hrvatskoga jezika, povijesti i kulture za azilante i strance pod supsidijarnom zaštitom radi uključivanja u hrvatsko društvo NN 154/2014	Decision on Croatian Language, History and Culture Programme for Inclusion	<a href="http://bit.ly/1FXstO8">http://bit.ly/1FXstO8</a> (HR)

Decision on the programme of Croatian language for asylum seekers and asylees and aliens under subsidiary protection who are over 15 years of age for the purpose of joining the secondary-school education system and the adult education system Official Gazette 100/2012	Odluka o nastavnom planu i programu hrvatskoga jezika za tražitelje azila, azilante i strance pod supsidijarnom zaštitom starije od 15 godina radi pristupa srednjoškolskom obrazovnom sustavu i sustavu obrazovanja odraslih NN 100/2012	Decision on Croatian Language Programme above the Age of 15	<a href="http://bit.ly/1yuPG7Y">http://bit.ly/1yuPG7Y</a> (HR)
Decision on establishing the price of passport issued in accordance with the 1951 Convention relating to the Status of Refugees Official Gazette 98/2016  Corrigendum Official Gazette 102/2016  <i>Amended:</i> Official Gazette 155/2022	Rješenje o utvrđivanju cijene putovnice izdane sukladno Konvenciji o statusu izbjeglica od 28. srpnja 1951. godine NN 98/2016  Ispravak Rješenja o utvrđivanju cijene putovnice izdane sukladno Konvenciji o statusu izbjeglica od 28. srpnja 1951. godine NN 102/2016  Rješenje o izmjeni Rješenja o utvrđivanju cijene putovnice izdane sukladno Konvenciji o statusu izbjeglica od 28. srpnja 1951. godine NN 155/2022	Decision on the Price of Refugee Passports	<a href="http://bit.ly/2kOXEmP">http://bit.ly/2kOXEmP</a> (HR)  <a href="http://bit.ly/2kvoBjf">http://bit.ly/2kvoBjf</a> (HR)  <a href="http://bit.ly/3FKQNXg">http://bit.ly/3FKQNXg</a> (HR)
Decision on the costs of accommodation in the Reception Centre for Asylum Seekers Official Gazette 47/2016 <i>Amended:</i> Official Gazette 155/2022	Odluka o troškovima smještaja u Prihvatilištu za tražitelje azila NN 47/2016  Odluka o izmjenama Odluke o troškovima smještaja u prihvatilištu za tražitelje azila NN 155/2022	Decision on the Costs of Accommodation	<a href="http://bit.ly/2lTyx3i">http://bit.ly/2lTyx3i</a> (HR)  <a href="http://bit.ly/3JZaWey">http://bit.ly/3JZaWey</a> (HR)
Ordinance on free legal aid in the procedure of granting international protection Official Gazette 140/2015 <i>Amended:</i> Official Gazette 155/2022	Pravilnik o besplatnoj pravnoj pomoći u postupku odobrenja međunarodne zaštite NN 140/2015, 155/2022	Ordinance on Free Legal Aid	<a href="http://bit.ly/2kXPLhy">http://bit.ly/2kXPLhy</a> (HR)  <a href="http://bit.ly/40xbm0W">http://bit.ly/40xbm0W</a> (HR)

Decision on relocation and resettlement of third country nationals or stateless persons who meet the conditions for approval of international protection Official Gazette 78/2015	Odluka o premještanju i preseljenju državljana trećih zemalja ili osoba bez državljanstva koje ispunjavaju uvjete za odobrenje međunarodne zaštite NN 78/2015	Decision on Relocation and Resettlement	<a href="http://bit.ly/2kDTnBH">http://bit.ly/2kDTnBH</a> (HR)
Decision on the establishment of the Interdepartmental Working Group for the Implementation of the Decision on relocation and resettlement of third country nationals or stateless persons who meet the conditions for approval of international protection Official Gazette 78/2015	Odluka o osnivanju Međuresorne radne skupine za provedbu Odluke o premještanju i preseljenju državljana trećih zemalja ili osoba bez državljanstva koje ispunjavaju uvjete za odobrenje međunarodne zaštite NN 78/2015	Decision on the Relocation and Resettlement Working Group	<a href="http://bit.ly/2IQNEgT">http://bit.ly/2IQNEgT</a> (HR)
Decision on resettlement of third country nationals or stateless persons who meet the conditions for approval of international protection Official Gazette 99/2017	Odluka o preseljenju državljana trećih zemalja ili osoba bez državljanstva koje ispunjavaju uvjete za odobrenje međunarodne zaštite NN 99/2017	Decision on Resettlement	<a href="https://bit.ly/2GVUWHW">https://bit.ly/2GVUWHW</a> (HR)
Decision on resettlement of third country nationals or stateless persons who meet the conditions for approval of international protection for 2019 Official Gazette 16/2019	Odluka o preseljenju državljana trećih zemalja ili osoba bez državljanstva koje ispunjavaju uvjete za odobrenje međunarodne zaštite za 2019. godinu NN 16/2019	Decision on Resettlement for 2019	<a href="https://bit.ly/2JdqcxL">https://bit.ly/2JdqcxL</a> (HR)
Decision to revoke the Decision on resettlement of third country nationals or stateless persons who meet the conditions for approval of international protection for 2019 Official Gazette 88/2022	Odluka o stavljanju izvan snage Odluke o preseljenju državljana trećih zemalja ili osoba bez državljanstva koje ispunjavaju uvjete za odobrenje međunarodne zaštite za 2019. godinu NN 88/2022		<a href="http://bit.ly/40bzyzZ">http://bit.ly/40bzyzZ</a> (HR)
Decision on relocation of the third country nationals or stateless persons who meet the conditions for approval of international protection Official Gazette 88/2022	Odluka o premještanju državljana trećih zemalja ili osoba bez državljanstva koje ispunjavaju uvjete za odobrenje međunarodne zaštite NN 88/2022		<a href="https://bit.ly/3JGMZHI">https://bit.ly/3JGMZHI</a> (HR)
Ordinance on participation of asylees, foreigners under subsidiary protection and foreigners under	Pravilnik o sudjelovanju azilanata, stranaca pod supsidijarnom zaštitom i stranaca pod privremenom zaštitom u plaćanju troškova smještaja	Ordinance on participation in the payment of	<a href="https://bit.ly/2Y115uv">https://bit.ly/2Y115uv</a> (HR)

<p>temporary protection in the payment of accommodation costs Official Gazette 59/2018</p> <p>New Ordinance on participation of asylees, foreigners under subsidiary protection and foreigners under temporary protection in the payment of accommodation costs Official Gazette 78/2025- entered into force on 17 May 2025</p>	<p>NN 59/2018</p> <p>Pravilnik o sudjelovanju azilanata, stranaca pod supsidijarnom zaštitom i stranaca pod privremenom zaštitom u plaćanju troškova smještaja NN 78/2025</p>	<p>accommodation costs</p>	<p><a href="https://narodne-novine.nn.hr/clanci/sluzbeni/2025_05_78_1028.html">https://narodne-novine.nn.hr/clanci/sluzbeni/2025_05_78_1028.html</a></p>
<p>Decision on determination of the price of residence permit for asylees and foreigners under subsidiary protection Official Gazette 98/2016</p> <p>Corrigendum Official Gazette 102/2016</p> <p><i>Amended:</i> Official Gazette 155/2022</p>	<p>Rješenje o utvrđivanju cijene dozvole boravka za azilanta i stranca pod supsidijarnom zaštitom NN 98/2016</p> <p>Ispravak Rješenja o utvrđivanju cijene dozvole boravka za azilanta i stranca pod supsidijarnom zaštitom NN 102/2016</p> <p>Rješenje o izmjeni Rješenja o utvrđivanju cijene dozvole boravka za azilanta i stranca pod supsidijarnom zaštitom NN 155/2022</p>	<p>Decision on the Price of Residence Permits</p>	<p><a href="http://bit.ly/2kvB0Un">http://bit.ly/2kvB0Un</a> (HR)</p> <p><a href="http://bit.ly/2kXSmb6">http://bit.ly/2kXSmb6</a> (HR)</p> <p><a href="http://bit.ly/3IE9Ewb">http://bit.ly/3IE9Ewb</a> (HR)</p>
<p>Decision on the list of safe countries of origin in the procedure of granting International Protection</p>	<p>Odluka o listi sigurnih zemalja podrijetla u postupku odobrenja međunarodne zaštite NN 45/2016</p>	<p>Decision on the List of Safe Countries of Origin</p>	<p><a href="http://bit.ly/2lcRePz">http://bit.ly/2lcRePz</a> (HR)</p>
<p>Ordinance on treatment of third country nationals, Official Gazette 136/2021</p> <p><i>Amended:</i> Official Gazette 145/2023</p>	<p>Pravilnik o postupanju prema državljanima trećih zemalja NN 136/2021, 145/2023</p>	<p>Ordinance on treatment of third country nationals</p>	<p><a href="https://bit.ly/3MfvLI0">https://bit.ly/3MfvLI0</a> (HR)</p> <p><a href="https://bit.ly/3z4YbMy">https://bit.ly/3z4YbMy</a> (HR)</p>
<p>Ordinance on accommodation in the Reception Centre for Foreigners and the method of calculating the costs of forced removal; Official Gazette 145/2021</p>	<p>Pravilnik o boravku u Prihvatnom centru za strance i načinu izračuna troškova prisilnog udaljenja NN 145/2021, 155/2022, 137/2023</p>	<p>Detention Centre Ordinance</p>	<p><a href="https://bit.ly/35NIA5r">https://bit.ly/35NIA5r</a> (HR)</p>

Amended: Official Gazette 155/2022 Amended: Official Gazette 137/2023			<a href="http://bit.ly/4067W5E">http://bit.ly/4067W5E</a> (HR) <a href="https://bit.ly/3KOVm4R">https://bit.ly/3KOVm4R</a> (HR)
Action plan for the Integration of beneficiaries of international protection for the period 2017-2019	Akcijski plan za integraciju osoba kojima je odobrena međunarodna zaštita za razdoblje 2017. do 2019. godine	Action plan for Integration	<a href="https://bit.ly/2GMCKNL">https://bit.ly/2GMCKNL</a> (HR) <a href="https://bit.ly/2IHO40C">https://bit.ly/2IHO40C</a> (EN)
Decision on the Establishment of a Permanent Commission for the Implementation of the Integration of Foreigners into Croatian Society Official Gazette 110/2019 Amended: Official Gazette 119 /2020 Amended: Official Gazette 68/2023	Odluka o osnivanju Stalnog povjerenstva za provedbu integracije stranaca u hrvatsko društvo NN 110/2019, 119 /2020, 68/2023	Decision on the Establishment of a Permanent Commission for Integration	<a href="https://bit.ly/2wCNTTX">https://bit.ly/2wCNTTX</a> (HR)  <a href="https://bit.ly/3wXxALF">https://bit.ly/3wXxALF</a> (HR) <a href="https://bit.ly/3Vp2OIN">https://bit.ly/3Vp2OIN</a> (HR)
Protocol on the treatment of unaccompanied children	Protokol o postupanju prema djeci bez pratnje		<a href="https://bit.ly/2UnJmLc">https://bit.ly/2UnJmLc</a> (HR) <a href="https://bit.ly/2DEgBEu">https://bit.ly/2DEgBEu</a> (HR)
Ordinance on stay of third country nationals in the Republic of Croatia: Official Gazette 20/2022 Amended: Official Gazette 155/2022	Pravilnik o boravku državljana trećih zemalja u Republici Hrvatskoj NN 20/2022, 155/2022		<a href="https://bit.ly/3HlvjYR">https://bit.ly/3HlvjYR</a> (HR)  <a href="http://bit.ly/42x6g6W">http://bit.ly/42x6g6W</a> (HR)
Decision on the establishment of the Interdepartmental Commission for the Protection of Unaccompanied Children Official Gazette 3/2022 New Decision on the establishment of the Interdepartmental Commission for the Protection of Unaccompanied Children- entered into force in 2025 Official Gazette 21/2025	Odluka o osnivanju Međuresornog povjerenstva za zaštitu djece bez pratnje NN 3/2022  Odluka o osnivanju Međuresornog povjerenstva za zaštitu djece bez pratnje NN 21/2025		<a href="http://bit.ly/3JZIIQW">http://bit.ly/3JZIIQW</a> (HR)  <a href="https://narodne-novine.nn.hr/clanci/sluzbeni/full/2025_02_21_186.html">https://narodne-novine.nn.hr/clanci/sluzbeni/full/2025_02_21_186.html</a>
Decision on the appointment of the president, deputy president, secretary, members and deputy members of the Interdepartmental Commission for the Protection of Unaccompanied Children, Official Gazette 52/2022	Rješenje o imenovanju predsjednice, zamjenice predsjednice, tajnice, članova i zamjenika članova Međuresornog povjerenstva za zaštitu djece bez pratnje NN 52/2022		<a href="http://bit.ly/3LLpsbg">http://bit.ly/3LLpsbg</a> (HR)



## Overview of the main changes since the previous update

The report was previously updated in **July 2024**.

### International protection

#### *Legislative framework*

- ❖ In 2024, a new Law on Administrative Disputes, the Ordinance on Amendments to the Ordinance on Forms and Data Collections in the Procedure for Granting International and Temporary Protection, as well as the Ordinance on the Method of Application and Implementation of the Recognition of Prior Learning were adopted. According to the explanatory note of the Final Proposal of the Law on Administrative Disputes, some of the intended goals of the new law included: modernizing administrative dispute proceedings; abolishing the subsidiary application of the Law on Civil Procedure (which had previously been applied to certain aspects of administrative disputes); explicitly regulating these matters within the the Law on Administrative Disputes (such as representation, procedural discipline, order in court, and evidence rules); encouraging a more proactive role of courts in case resolution; reducing the duration of administrative disputes; improving procedural discipline; increasing legal certainty for parties; and eliminating legal under-regulation. Notably, the new Law explicitly states that in administrative disputes, courts must base decisions, among other things, on the *acquis* of the European Union.

Additionally, in December 2024, the Ministry of the Interior launched a public consultation on the Draft Proposal of the Law on Amendments to the Law on International and Temporary Protection (LITP).<sup>7</sup> The proposed amendments relate to the duration of temporary protection under the current LITP. The primary aim of the proposed amendments is to revise Article 79 of the current LITP, which limited the maximum duration of temporary protection to three years, without allowing for extensions beyond March 4, 2025, or when there is a continued need. Furthermore, the amendments will also introduce provisions for the development and adoption of a national strategic planning document, including its content, the competent authority for its adoption, and the deadline for its adoption.

#### *Asylum procedure*

- ❖ **Access to the territory:** Although the Ombudswoman reported that in 2024, a further decrease in the number of complaints on pushbacks to the Ombudsperson was recorded, pushback practices persisted throughout 2024, as reported by organisations such as the No Name Kitchen, Save the Children, Danish Refugee Council (DRC), the Border Violence Monitoring Network (BVMN), and the Centre for Peace Studies (CPS).
- ❖ **Relevant case law on access to the territory:** Concerning the case of *M.H. and Others v. Croatia*,<sup>8</sup> in July 2024, the Centre for Peace Studies and the Human Rights House Zagreb submitted a final communication to the Committee of Ministers of the Council of Europe, in accordance with Rule 9.2 of the Rules of the Committee of Ministers for the supervision of the execution of judgments and terms of friendly settlements.<sup>9</sup> With this third submission, they called upon the Croatian Government to adopt a concrete action plan that includes an effective investigation, the sanctioning of those responsible, and compensation to the family of the victim.

<sup>7</sup> Draft Proposal of the Law on Amendments to the Law on International and Temporary Protection, 19 December 2024, available at: <https://esavjetovanja.gov.hr/ECon/MainScreen?entityId=20131>

<sup>8</sup> ECtHR, Judgment in the case of M.H. and others v. Croatia (Applications nos. 15670/18 and 43115/18), available at: <https://bit.ly/43wOzE9>.

<sup>9</sup> Centre for Peace Studies, Human Rights House Zagreb: Communication to the Committee of Ministers of the Council of Europe, 26 July 2025, available at: [https://www.cms.hr/wp-content/uploads/CPS\\_HRHZ\\_Rule\\_9.2\\_M.H.\\_July\\_2024.pdf](https://www.cms.hr/wp-content/uploads/CPS_HRHZ_Rule_9.2_M.H._July_2024.pdf).

They also demanded systemic changes to end unlawful pushbacks, ensure accountability, and establish effective oversight of police conduct and adherence to the rule of law in Croatia.<sup>10</sup>

- ❖ **Key statistics on the asylum procedure:** The number of applicants for international protection decreased compared to 2023, going from 68,114 in 2023 to 26,776 people making an application for international protection (i.e. expressing intention to apply for international protection) in 2024.<sup>11</sup> Out of the total number of expressed intentions to apply for international protection, the largest number of intentions was expressed (i.e., applications made) at border police stations, police stations and police administrations (25,739). Most intentions to apply for international protection were expressed at the Stara Gradiška border police station (3,681), followed by the Slavonski Brod border police station (3,119 ) and the Dvor border police station (2,378 ). 296 applicants for international protection expressed intentions at airport police stations, mostly in Zagreb (Pleso) (293), followed by Zadar (2) and Split (Resnik) (1). 195 applicants for international protection made their applications in detention centres (i.e., at the Reception Centre for Foreigners in Jezevo (90), the Transit Reception Centre in Tovarnik (34), and the Transit Reception Centre in Trilj (71)), so that the total number of intentions registered in detention in 2024 increased by 5% compared to 2023. Out of the total number of applications made, only 1,307 applications for international protection were then lodged. In 2024, a total of 359 international protection applications were decided *in meritis*, and 279 applications were rejected.<sup>12</sup> The recognition rate remained low, and 80 persons were granted international protection in 2024. According to the 2024 Ombudswoman report statistics, the number of lodged application is slightly different, recording that out of a total of 26,776 expressed intentions, 1,419 applications for international protection were lodged. In 2024, the procedure for 15,338 applications for international protection was suspended, which is in line with the trend in the past few years.<sup>13</sup>
- ❖ **Dublin procedure:** In 2024, there was an increase in incoming Dublin transfers, and Croatia received a total of 1,698 incoming transfers which were carried out from the following Member States: Austria (249), Belgium (90), Czech Republic (7), Denmark (8), Finland (18), France (215), Greece (1), Germany (514), Hungary (11), Iceland (1), Italy (1), Liechtenstein (1), Luxembourg (12), Netherlands (106), Norway (42), Poland (2), Slovakia (4), Slovenia (57), Sweden (11), and Switzerland (348).<sup>14</sup> The practice of some Member States when transferring individuals to Croatia is particularly concerning. In particular, in 2024, many of those transferred arrived in extremely poor physical and mental health and without medical documentation, which posed significant challenges for institutions and NGOs providing support in Croatia. Transfers often took place without any prior notice to the individuals concerned, sometimes during the night, leaving them unprepared and without the opportunity to collect their personal belonging. This severely hampered the timely provision of support, particularly for vulnerable groups such as trauma survivors and individuals with chronic or serious illnesses.
- ❖ **Procedure for granting international protection:** At the end of 2024, after the fall of the Assad regime, Croatia temporarily suspended the processing of applications for international protection of Syrian applicants for international protection. In Croatia, the processing of 53 applications was suspended.<sup>15</sup> The Ministry of Interior informed the Croatian Law Centre that Syrian citizens whose applications for international protection were suspended, continue to have the status of applicants

<sup>10</sup> Information provided by the Centre for Peace Studies, 27 February 2025.

<sup>11</sup> Ministry of Interior, Statistics 2024, available at <https://mup.gov.hr/UserDocsImages/statistika/2025/1/Statistika%20medjunarodna%20zastita%202024.xlsx>.

<sup>13</sup> Ombudswoman: Report of the Ombudswoman for 2024, page 268, available at: <https://www.ombudsman.hr/hr/download/izvje-e-pu-ke-pravobraniteljice-za-2024-godinu/?wpdmdl=20339&refresh=67efca50785f31743768144/>.

<sup>14</sup> Ministry of Interior, Statistics 2024, available at: <https://mup.gov.hr/UserDocsImages/statistika/2025/1/Statistika%20medjunarodna%20zastita%202024.xlsx>.

<sup>15</sup> Ministry of Interior: *Deputy Prime Minister and Minister Božinović on decisions on the suspension for citizens of Syria*, 12 December 2024, available at: <https://mup.gov.hr/vijesti/potpredsjednik-vlade-i-ministar-bozinovic-odlukama-o-obustavi-azila-za-drzavljan-e-sirije-video/294513>.

as before and, accordingly, all the rights prescribed by the Law on International and Temporary Protection.<sup>16</sup>

### *Reception conditions*

- ❖ **Reception centres:** Due to a lower number of applicants for international protection, reception capacities were not as strained in 2023. However, in 2024 complaints concerning accommodation conditions continued to be received as reported by the Ombudswoman and NGOs. According to information from the Croatian Red Cross, during 2024 a large number of applicants for international protection stayed in the Reception Centre for Applicants for International Protection for just a few days, while there were also those who stayed for less than 24 hours.<sup>17</sup>

In 2024, a total of 498 applicants for international protection were accommodated in social welfare institutions outside the in Reception Centre for Applicants for International Protection.<sup>18</sup>

### *Detention of asylum seekers*

- ❖ **Restrictions to the freedom of movement:** According to the Ministry of Interior, in 2024, the Service for Reception and Accommodation of Applicants for International Protection issued 52 decisions on restrictions of freedom of movement with a measure of detention in the Reception Centre for Foreigners in Ježevo and Transit Reception Centre for Foreigners in Trilj.<sup>19</sup> However, since decisions can also be issued by the police administrations/stations, the total number might be different.

### *Content of international protection*

- ❖ **Inclusion:** No new Integration Action Plan was adopted in 2024, even the previous Integration Action Plan expired at the end of 2019. At the local level, in September 2024, a cooperation agreement between the City of Zagreb and UNHCR Croatia was signed and the Welcome Center (One Stop Shop) was opened in Zagreb with UNHCR's support.<sup>20</sup> The One Stop Shop is envisaged as a unique central point for informing applicants for international protection, individuals granted international or temporary protection, and foreign workers with residence and work permits. It is the first service of this kind in Croatia.<sup>21</sup>

### *Other relevant developments*

- ❖ **Pact on Migration and Asylum:** All EU Member States, including Croatia, were required to adopt a National Implementation Plan (NIP) regarding the Pact on Migration and Asylum by December 2024. The process of developing the NIP in Croatia is coordinated by the Ministry of the Interior, with a working group consisting of representatives from various ministries and the Office for Human Rights and the Rights of National Minorities. The process of developing and adopting the NIP is not public, nor is it open for public consultation with interested parties.<sup>22</sup>

## **Temporary protection**

The information given hereafter constitutes a short summary of the annex on Temporary Protection to this report. For further information, see [Annex on Temporary Protection](#).

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<sup>16</sup> Information provided by the Ministry of Interior, 23 December 2024.

<sup>17</sup> Information provided by the Croatian Red Cross, 20 January 2025.

<sup>18</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).

<sup>19</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).

<sup>20</sup> Information provided by the UNHCR Office for Croatia, 18 March 2025.

<sup>21</sup> Information provided by the City of Zagreb, 20 September 2024.

<sup>22</sup> Information provided by the UNICEF Office for Croatia, 4 February 2025.

- ❖ **Registration for temporary protection:** On 7 March 2022, the Government of the Republic of Croatia adopted the decision introducing temporary protection<sup>23</sup> on the basis of Council Implementing Decision (EU) 2022/382 of 4 March 2022, which establishes the existence of a mass influx of persons in accordance with Article 5 of Directive 2001/55/ EC. Applications for temporary protection need to be submitted at police stations, while the competent authority for recognising the temporary protection status lies with the Ministry of Interior. The application can be submitted in person at the police station or administration based on the place of residence of the applicant or via an online form available at the e-platform Croatia4Ukraine.<sup>24</sup> An exception was foreseen for those persons who were accommodated in collective accommodation, at times of increased arrivals of persons displaced from Ukraine to Croatia.<sup>25</sup> These persons did not have to go personally to the police station/administration, but could submit the application directly to the officials of the Ministry of the Interior who visited the collective accommodations in order to speed up the process of receiving and further processing of the applications.
- ❖ **Scope of temporary protection:** Pursuant to the aforementioned Government's Decision, Croatia shall grant temporary protection to Ukrainian nationals and members of their families residing in Ukraine on 24 February 2022 and who left Ukraine from 24 February 2022 onwards; stateless persons and third country nationals who were under international or equivalent national protection in Ukraine on 24 February 2022 and members of their families who were granted residence in Ukraine on 24 February 2022 and who left Ukraine since 24 February 2022; third country nationals who had a valid permanent stay in Ukraine on 24 February 2022 in accordance with Ukrainian regulations and who cannot return to their country or region of origin in safe and permanent conditions and who left Ukraine since 24 February 2022. Regarding those who had fled Ukraine before 24 February 2022, temporary protection shall also be granted to the displaced citizens of Ukraine and members of their families who left Ukraine immediately before 24 February 2022 due to the security situation and cannot return to the country because of the armed conflict. According to the official statement of the Ministry of Interior, 'immediately before' is to be considered as starting from 1 January 2022.<sup>26</sup>

#### Content of temporary protection

- ❖ **Residence permit:** After the person has been granted the status of temporary protection, the police administration, *i.e.*, the police station competent based on the place of residence of the applicant, or officials of the Ministry of Interior or of the police administrations or police stations who are present in collective accommodation facilities issue the identity card of a foreigner under temporary protection to the person. The card is proof of having been granted TP status, represents the residence permit and serves as a valid document for exercising all the rights that beneficiaries are entitled to under the scope of protection status. Given the fact that the circumstances related to the introducing of temporary protection did not change over the course of the second year, in October 2023, a decision was reached at EU level to extend the TPD for an additional third year. Consequently, the Croatian Government implemented this decision, extending the duration of temporary protection until 4 March 2025.<sup>27</sup> Following the Council's Implementing Decision (EU) 2024/1836 of 25 June 2024 extending temporary protection as introduced by Implementing

<sup>23</sup> Government of the Republic of Croatia: *Decision on the Introduction of Temporary Protection in the Republic of Croatia for Displaced Persons from Ukraine*, available in Croatian at: <https://bit.ly/3VHeVIQ>.

<sup>24</sup> Application is available in English, Croatian and Ukrainian at the following link: <https://croatia4ukraine.mup.hr/Pages/Zahtjev>.

<sup>25</sup> Government of the Republic of Croatia: *Information on the status of temporary protection*, available at: <https://bit.ly/4c0Rf1D>.

<sup>26</sup> Information provided by the Ministry of Interior on 10 November 2022.

<sup>27</sup> Government of the Republic of Croatia: *Decision on the Extension of Temporary Protection for Displaced Persons from Ukraine*, available at: <https://bit.ly/4b0Ugh7>.

Decision (EU) 2022/382,<sup>28</sup> by which temporary protection is extended until 4 March 2026, on 19 December 2024 the Croatian Government launched a public consultation on a Proposal of the Law on amendments to the Law on International and Temporary Protection.<sup>29</sup> The Proposal, *inter alia*, aimed to revise Article 79, which limited temporary protection to three years, preventing extensions beyond 4 March 2025. Referred to the urgent legislative procedure, the proposal was finally adopted in 2025.<sup>30</sup> Displaced persons from Ukraine who have temporary protection in the Republic of Croatia will automatically have their temporary protection extended until 4 March 2026. According to the instructions of the Ministry, persons displaced from Ukraine who have been granted temporary protection in the Republic of Croatia should personally reach a police department or police station according to their place of residence in order to certify the extension of the validity of the identity card until 30 May 2025. The extension will be recorded in the existing identity card, and it is not necessary to submit a request for the extension of temporary protection. Persons who did not extend their identity cards until 30 May 2025 did not lose their status of temporary protection.

- ❖ **Access to rights:** Beneficiaries of temporary protection enjoy a wide range of rights in the Republic of Croatia, and no significant obstacles to their realisation have been observed due to the fast reaction of the authorities and the early establishment of an effective reception and care system. By amending the Law on Social Welfare in 2022, beneficiaries of temporary protection gained the right to receive all social services and benefits provided by law under the same conditions as Croatian citizens.
- ❖ **Access to the labour market:** Beneficiaries of temporary protection have unrestricted access to the labour market, as do Croatian citizens. What represents a difficulty is the insufficient knowledge of the Croatian language (and the lack of official language courses organised by the State) and the lengthy and expensive procedure of recognition and evaluation of foreign qualifications (especially for professions regulated by law). Therefore, options for employment in certain professions are significantly limited.
- ❖ **Access to education:** Access to primary and secondary education is fully facilitated and accessible. As for admission to higher education institutions, only some universities or their constituents decided to facilitate enrolment or continuation of studies, while the rest kept the quota system for third country nationals, which implies high tuition fees.
- ❖ **Housing:** Persons who cannot afford to live in private accommodation have two options available: accommodation in a collective centre where they are provided with free accommodation and food, and accommodation in private units that meet the prescribed conditions, for which a contract is concluded between the landlord and the State.
- ❖ **Health care:** Within the framework of exercising the right to health care, beneficiaries of temporary protection face problems that represent a general feature of the health care system in the Republic of Croatia - long-term waiting for specialist examinations. In addition, they are not entitled to contract supplementary health insurance. They enjoy the right to health care to the extent enjoyed by persons who are compulsorily insured, but at the same time they are not insured and the costs of their health care are covered directly from the budget of the Republic of Croatia. As a result, they are not able to contract supplementary insurance, except in the case of employment, which would avoid additional (and large) health care costs that exceed the scope of protection provided by compulsory insurance.

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<sup>28</sup> Council of the EU, Implementing Decision (EU) 2024/1836 of 25 June 2024 extending temporary protection as introduced by Implementing Decision (EU) 2022/382, OJ L, 2024/1836, 3 July 2024, available at: [https://eur-lex.europa.eu/eli/dec\\_impl/2024/1836/oj/eng#ntr3-L\\_202401836EN.000101-E0003](https://eur-lex.europa.eu/eli/dec_impl/2024/1836/oj/eng#ntr3-L_202401836EN.000101-E0003).

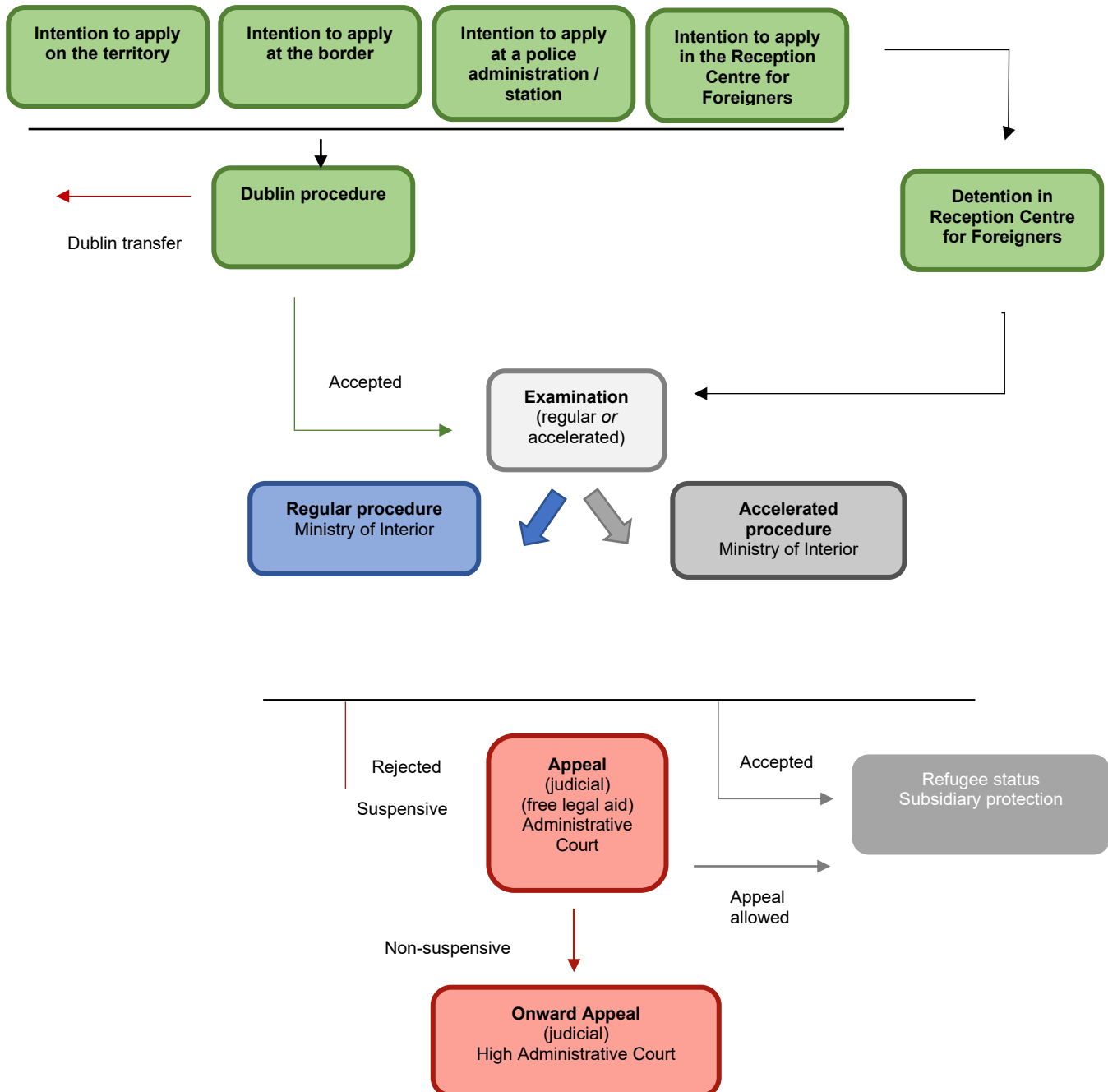
<sup>29</sup> Proposal of the Law on amendments to the Law on International and Temporary Protection, 19 December 2024, available at: <https://esavjetovanja.gov.hr/ECon/MainScreen?entityId=20131>.

<sup>30</sup> Law on Amendments to the Law on International and Temporary Protection, 11 February 2025, available at: [https://narodne-novine.nn.hr/clanci/sluzbeni/2025\\_02\\_17\\_161.html](https://narodne-novine.nn.hr/clanci/sluzbeni/2025_02_17_161.html).

# Asylum Procedure

## A. General

### 1. Flow chart





## 2. Types of procedures

### Indicators: Types of Procedures

1. Which types of procedures exist in your country?
 

❖ Regular procedure:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
▪ Prioritised examination: <sup>31</sup>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
▪ Fast-track processing: <sup>32</sup>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
❖ Dublin procedure:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
❖ Admissibility procedure:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
❖ Border procedure:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
❖ Accelerated procedure:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
❖ Other:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
2. Are any of the procedures that are foreseen in the law, not being applied in practice?
 

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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According to the information provided by the Ministry of Interior in March 2024, the border procedure foreseen by the Law on International and Temporary Protection (LITP) is not applied in practice.<sup>33</sup>

## 3. List the authorities that intervene in each stage of the procedure

Stage of the procedure	Competent authority (EN)	Competent authority (HR)
Intention to apply <ul style="list-style-type: none"> <li>❖ At the border</li> <li>❖ On the territory</li> </ul>	Border Police, Ministry of Interior  Police administration or Police station Reception centre for Foreigners  Exceptionally Reception Centre for Applicants for International Protection	Granična policija  Policijska uprava Policijska postaja Prihvatni centar za strance Prihvatilište za tražitelje međunarodnu zaštite
Registration of application	Border police Police administration or Police station Reception Centre for Foreigners  Reception Centre for Applicants for International Protection, Ministry of Interior	Granična policija Policijska uprava ili policijska postaja Prihvatni centar za strance  Prihvatilište za tražitelje međunarodne zaštite, Ministarstvo unutarnjih poslova
Dublin (responsibility assessment)	Department for Dublin procedure, Ministry of Interior	Odjel za dublinski postupak, Ministarstvo unutarnjih poslova
Refugee status determination	Department for international protection procedure, Ministry of Interior	Odjel za postupak međunarodne zaštite, Ministarstvo unutarnjih poslova
Appeal <ul style="list-style-type: none"> <li>❖ Lawsuit/complaint</li> <li>❖ Onward appeal</li> </ul>	Administrative Court High Administrative Court	Upravni sud Visoki upravni sud
Subsequent application	Department for international protection procedure, Ministry of Interior	Odjel za postupak međunarodne zaštite, Ministarstvo unutarnjih poslova

<sup>31</sup> For applications likely to be well-founded or made by vulnerable applicants. See Article 31(7) recast Asylum Procedures Directive.

<sup>32</sup> Accelerating the processing of specific caseloads as part of the regular procedure.

<sup>33</sup> Information provided by the Ministry of Interior, 8 March 2024.

#### 4. Determining authority

Name in English	Number of staff	Ministry responsible	Is there any political interference possible by the responsible Minister with the decision making in individual cases by the determining authority?
Department for international protection procedure	N/A	Ministry of Interior	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Reception Centre for applicants for international protection in Zagreb and Kutina	N/A	Ministry of Interior	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Asylum matters are under the responsibility of the Directorate for Immigration, Citizenship and Administrative Affairs, under which the Sector for foreigners and international protection is divided into following organisational units dealing with asylum matters:<sup>34</sup>

1. Service for international protection
  - ❖ Department for international protection procedure
  - ❖ Department for Dublin procedure
  - ❖ Department for integration
2. Service for reception and accommodation of applicants for international protection
  - ❖ Reception centre for applicants of international protection in **Zagreb**
  - ❖ Reception centre for applicants of international protection in **Kutina**

The Department for international protection procedure of the Ministry of Interior is an administrative authority responsible for examining applications for international protection and competent to take decisions at first instance. In September 2020, a new Decree on the internal structure of the Ministry of Interior entered into force,<sup>35</sup> and was amended in 2022.<sup>36</sup> The same organisational units were responsible for asylum related matters in the course of 2024.

No detailed information on trainings of the officials is available for 2024. However, the training of officials is continuously carried out through the EUAA curriculum, as well as through workshops organised, for example, by the UNHCR.

In May 2024, UNHCR Croatia organised a two-day training on refugee status determination for eighteen staff from the Ministry of Interior's Service for International Protection. The workshop covered effective interviewing techniques, with a special focus on working with applicants for international protection with specific needs, particularly children and survivors of trafficking and gender-based violence. Additionally, the training addressed credibility assessments and eligibility guidelines.<sup>37</sup>

Croatia has a single procedure for international protection. The Department for International Protection Procedure examines whether the applicant fulfils the eligibility criteria for refugee status and, failing that, subsequently examines whether the applicant is eligible for subsidiary protection. The civil servants working in the Department for International Protection Procedure issue a decision on the application based on their findings following an interview with the applicant, taking into account all the relevant facts and

<sup>34</sup> This Sector further includes units responsible for other migration-related matters, e.g., citizenship, legal residence of foreigners, visas etc.

<sup>35</sup> Decree on the internal structure of the Ministry of Interior, Official Gazette 97/2020, available in Croatian at: <https://bit.ly/2Rrj1zK>.

<sup>36</sup> Amendments of Decree on the internal structure of the Ministry of Interior, Official Gazette 7/2022 available in Croatian at: <https://bit.ly/3n6iDGG>; Amendments of Decree on the internal structure of the Ministry of Interior, Official Gazette 149/2022 available in Croatian at: <https://bit.ly/3TCOKKi>.

<sup>37</sup> Information provided by the UNHCR Office for Croatia, 18 March 2025.



circumstances arising from the application, the applicant's position and personal circumstances (including sex and age) based on the testimony presented during the interview, the evidence submitted and available country of origin information and if necessary information about the country through which s/he travelled, as well as the activities of the applicant after leaving the country of origin to assess whether these activities might expose him/her to persecution or serious harm if they are returned to that country. The existence of an internal protection alternative in the country of origin, and the possibility for the applicant to obtain the protection of their alleged country of nationality, are also considered when taking a decision.<sup>38</sup>

When deciding on the credibility of the applicant's statements, the person conducting the procedure should abide by the principle of the benefit of the doubt.<sup>39</sup>

As far as the Croatian Law Centre is aware, the Head of the Department for international protection procedure reviews all decisions in order to ensure the quality of decisions.

## 5. Short overview of the asylum procedure

The procedure for granting international protection in Croatia is an administrative procedure regulated by the Law on International and Temporary Protection (LITP). Additionally, the Law on General Administrative Procedure is applied in the procedure, unless otherwise provided by the LITP.

The implementation of asylum policies in Croatia falls under the responsibility of the Ministry of Interior, which is also responsible for the determining authority in charge of examining applications for international protection (see above, [Determining authority](#)).<sup>40</sup>

The Service for reception and accommodation of applicants for international protection is in charge of two reception centres located in **Zagreb** and **Kutina**, respectively. Officials of the determining authority are thus not only responsible for conducting interviews but also for ensuring access to reception of applicants for international protection.

### Registration

The procedure officially begins from the lodging of the application for international protection. Before this stage, a foreigner must express the intention to seek international protection. Immediately following the expression of the intention to apply for international protection, police officers shall take the applicant's fingerprints and shall photograph them, establish their identity, how they entered the Republic of Croatia, their travel route from the country of origin to the Republic of Croatia, and personal circumstances of importance for assessing the special reception and procedural guarantees.<sup>41</sup> If due to justified reasons, police officers are unable to perform those tasks, the officials of the Service for the reception and accommodation of applicants for international protection in the Reception Center shall exceptionally perform such tasks.<sup>42</sup> Following the expression of the intention, applicants have access to reception.

Border officers, the police station, police administration or the Reception Centre for Applicants for International Protection shall register the applicant in the records of the Ministry of Interior no later than 3 working days from the day the applicant expressed the intention to apply for international protection. If the intention was expressed before some other body, the Reception Centre shall register the applicant in the records of the Ministry within six working days from the day they expressed their intention.<sup>43</sup> The authority which carried out the registration shall issue a certificate of registration of the applicant in the records of the Ministry, and shall, as necessary, set a time limit by which the applicant must report to the Reception Centre for Applicants for International Protection to lodge an application.<sup>44</sup>

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<sup>38</sup> Articles 27 and 28 LITP.

<sup>39</sup> Article 29 LITP.

<sup>40</sup> Article 32(1) LITP.

<sup>41</sup> Article 33(8) LITP.

<sup>42</sup> Article 33(9) LITP.

<sup>43</sup> Article 33(10) LITP.

<sup>44</sup> Article 33(11) LITP.

Applicants shall be permitted to lodge an application within the shortest possible time and no later than 15 days from registration of their status in the records of the Ministry of Interior.<sup>45</sup>

### **First instance procedure**

After the application has been lodged, the Department for International Protection Procedures of the Ministry of Interior shall arrange the personal interview with the applicant as soon as possible,<sup>46</sup> and shall issue a decision within six months of a duly completed application or a duly completed and admissible subsequent application.<sup>47</sup> The six-month time limit may be extended for a further 9 months under certain circumstances and, exceptionally, the procedure may last up to 21 months. The Department for the Dublin procedure is responsible for examining the Dublin criteria and carrying out Dublin transfers to another Member State.

The procedure for international protection in Croatia is a single procedure, given that applications for international protection cover both requests for asylum i.e. refugee status and subsidiary protection, thus allowing the Department for International Protection Procedures to determine *ex officio* the existence of conditions for granting subsidiary protection status where the conditions for granting asylum (refugee status) are not met. An application may also be processed under an accelerated or border procedure, although the latter is not used in practice. The decision rejecting the application for international protection also states that the person is obliged to leave the European Economic Area within a certain period of time or will be forcibly removed.

### **Accelerated procedure**

According to the LITP, the Ministry of Interior shall issue a decision in an accelerated procedure within two months from the day the application or an admissible subsequent application is lodged. There are ten grounds for applying the accelerated procedure. The deadline for lodging a lawsuit according to the LITP is eight days from the day the decision is delivered, but the lawsuit has no suspensive effect.<sup>48</sup>

### **Border procedure**

Procedures at the border or in transit zones are regulated by the LITP. However, according to the Ministry of Interior's information from March 2024, these are not applied in practice.<sup>49</sup>

### **Appeal**

Negative decisions may be challenged before the Administrative Court within 30 days in the regular procedure, and eight days in the case of Dublin decisions, suspension of procedure, dismissal of applications or subsequent inadmissibility applications or the accelerated procedure. Lawsuits have automatic suspensive effect in the regular procedure, Dublin cases and in cases of subsequent applications if the application is not inadmissible, but not in the accelerated procedure and in some cases of dismissal.

As regards onward appeals, besides the possibility to lodge a non-suspensive appeal to the High Administrative Court, there is also a possibility to lodge a complaint before the Constitutional Court in case the applicant claims a violation of a right guaranteed by the Croatian Constitution. In that case, a foreigner would have to regularise their stay in Croatia in accordance with the Law on Foreigners, as stay under the LITP is not foreseen once the administrative dispute is over. However, it is not feasible in practice for rejected applicants to easily regularise their stay under the Law on Foreigners, as the majority of them would not meet the conditions prescribed by the Law on Foreigners to obtain a residence permit. This

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<sup>45</sup> Article 34(2) LITP.

<sup>46</sup> Article 35(1) LITP.

<sup>47</sup> Article 40(1) LITP.

<sup>48</sup> Article 41(5) and 51(1)(1) LITP.

<sup>49</sup> Information provided by the Ministry of Interior, 8 March 2024.

makes it very difficult in practice to appeal against a negative decision from the Administrative Court on constitutional grounds.

## B. Access to the procedure and registration

### 1. Access to the territory and pushbacks

#### Indicators: Access to the Territory

1. Are there any reports (NGO reports, media, testimonies, etc.) of people refused entry at the border and returned without examination of their protection needs? ☒ Yes ☐ No
2. Is there a border monitoring system in place? ☒ Yes ☐ No
  - ❖ If so, who is responsible for border monitoring? ☐ National authorities ☐ NGOs ☒ Other
  - ❖ If so, how often is border monitoring carried out? ☒ Frequently ☐ Rarely ☐ Never

Although in 2024 a further decrease in the number of complaints on pushbacks to the Ombudsperson was recorded, pushback practices persisted throughout 2024, as reported by civil society organisations.

#### 1.1. Illegal border practices, pushbacks and ill-treatment

According to the Ministry of Interior, there were 29,294 irregular border crossings in 2024, thus marking a decrease of 58% compared to 2023, when 69,726 irregular border crossing cases were recorded. The main countries of origin of persons apprehended while irregularly crossing the border were Syria (8,947), Türkiye (8,559), Afghanistan (2,717), Iraq (901) and China (891). Out of this number, 28,128 persons crossed the border irregularly, 879 avoided border control, 216 misused travel documents and 71 were accepted by the police of another State.<sup>50</sup>

At the beginning of 2025, the Minister of the Interior stated that, according to estimates, in 2024 the police prevented more than 71,000 individual illegal entries into the territory of Croatia.

The Ombudswoman reported that, according to data from the Ministry of the Interior, out of 29,294 irregular migrants that were registered in Croatia in 2024, 5,950 persons received a return decision with a deadline for voluntary return, and 2,457 of these persons left the country. This means that 41.3% of the people who received decisions for voluntary return left the country, which is more than in previous years (19.6% in 2023; 1.92% in 2022; and 5.63% in 2021). Decisions on expulsion ordering forced removal were received by 6,015 persons.<sup>51</sup>

In the report for 2024, the Ombudsman for Children stated that according to data from the Ministry of the Interior for 2024, the number of children caught crossing the state border irregularly was 6,936, of which 1,340 were unaccompanied children. Of the total number of children, 2,819 were under the age of 10.<sup>52</sup>

In June 2023, the Memorandum of Understanding between Croatia and Frontex was signed and aimed at establishing a collaboration in the return's procedures of third country nationals.<sup>53</sup>

In 2024, two decisions were adopted amending the Decision on the Direct Allocation of Financial Resources for the implementation of the project "Strengthening National and FRONTEX Capacities for the Surveillance of the European Union's External Border". Pursuant to the Second Annex to the Agreement, the total value

<sup>50</sup> Ministry of Interior: Statistical overview of the fundamental safety indicators and work results in 2024, page 158, available at: [https://mup.gov.hr/UserDocsImages/statistika/2025/statistika%20za%202024%20hrv%20i%20eng/Statisticki\\_pregled\\_2024\\_web.pdf](https://mup.gov.hr/UserDocsImages/statistika/2025/statistika%20za%202024%20hrv%20i%20eng/Statisticki_pregled_2024_web.pdf).

<sup>51</sup> Ombudswoman: Report of the Ombudswoman for 2024, page 268, available at: <https://www.ombudsman.hr/hr/download/izvje-e-pu-ke-pravobraniteljice-za-2024-godinu/?wpdmdl=20339&refresh=67efca50785f31743768144/>.

<sup>52</sup> Ombudswoman for Children: *Report on the work of the Ombudswoman for Children in 2024*, page 199, available at: <https://dijete.hr/hr/download/izvjesce-o-radu-pravobraniteljice-za-djecu-za-2024-godinu/>.

<sup>53</sup> Ministry of Interior: *Vice President Božinović presented the Memorandum of Understanding in the field of returns between the Republic of Croatia and Frontex*, 13 July 2023, available at: <https://bit.ly/4b4GuKj>.

of the project was increased to 28,929,111.10 EUR including VAT, of which 90% is co-financed through the Integrated Border Management Fund, under the Instrument for Financial Support for Border Management and Visa Policy. According to information published on the Ministry of the Interior's website, the Fund's resources will enable the strengthening of the EU's external border security through the procurement of drone detection systems, vessels, off-road vehicles, and drones. The implementation of activities within this project will support the operations of the Croatian Border Police in carrying out tasks related to the surveillance of the national and EU external borders, enhance their capacity to respond to incidents in a timely manner and in all types of terrain and, through the procurement of the mentioned equipment, contribute to the operational aspects of FRONTEX's external border management—such as joint operations, rapid border interventions, effective support to other Member States on the ground, combating cross-border crime, and preventing irregular migration.<sup>54</sup>

In addition, in 2024, the Directorate for European Affairs, International Relations and EU Funds of the Ministry of the Interior directly allocated funds to the Border Police Directorate of the Ministry of the Interior for the implementation of the project “TRANSFER – Providing Support to Applicants for International Protection by Ensuring Appropriate Transport”. The purpose of the project is to provide transportation services using appropriate vehicles for applicants for international protection to an open-type reception facility, or to a location where their reception and accommodation will be ensured, or where they can submit an application for international protection, as well as to locations where screening will be conducted in accordance with the Pact on Migration and Asylum. 75% of the total eligible project costs are funded through AMIF, while Croatia will provide co-financing for 25% of the eligible project costs.<sup>55</sup>

Croatian Red Cross reported that throughout 2024, humanitarian assistance was provided to migrants apprehended at the national border, temporarily held in police stations, or found in irregular movement and residence within Croatia. Humanitarian aid packages typically included food, water, hygiene items, footwear, underwear, and clothing. This assistance was delivered through local branches of the Croatian Red Cross across the country, with a particular focus on branches located near the borders with Bosnia and Herzegovina and Serbia.<sup>56</sup>

In January 2025, ministers of interior affairs of Croatia, Slovenia, and Italy signed a memorandum on trilateral border patrols. By this operational Memorandum of Understanding all three parties will agree on the modalities of joint trilateral patrols on the external border of Croatia.<sup>57</sup>

### **Pushback practices reported by national and European NGOs and other actors**

Pushback practices persisted throughout 2024, as reported by organisations such as the No Name Kitchen, Save the Children, Danish Refugee Council (DRC), the Border Violence Monitoring Network (BVMN),<sup>58</sup> and the Centre for Peace Studies (CPS).

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<sup>54</sup> Ministry of Interior: *The Second Annex to the Agreement on the direct allocation of financial resources for the implementation of the project "Strengthening national and FRONTEX capacities for the Surveillance of the of the European Union's External Border " has been concluded*, 9 August 2024, available at: <https://mup.gov.hr/vijesti/sklopljen-je-drugi-dodatak-sporazumu-o-izravnoj-dodjeli-financijskih-sredstava-za-provedbu-projekta-jacanje-nacionalnih-i-frontex-ovih-kapaciteta-za-nadzor-vanjske-granice-europske-unije/294203>.

<sup>55</sup> Ministry of Interior: Decision on the direct allocation of financial resources for the implementation of the project “TRANSFER – Providing Support to Applicants for International Protection by Ensuring Appropriate Transport”, available at: <https://eufondovi.mup.hr/UserDocImages/dokumenti/Odluka%20o%20dodjeli%20financijskih%20sredstava/14.%20Odluka%20-%20TRANSFER.pdf?vel=939115>.

<sup>56</sup> Croatian Red Cross: Annual report on the work of the Croatian Red Cross in 2024, page 84, available at: [https://www.hck.hr/UserDocImages/vijesti/2025/AD%205\)%20Izvj%C5%A1%C4%87e%20o%20radu%20HCK%20u%202024.pdf?vel=5096156](https://www.hck.hr/UserDocImages/vijesti/2025/AD%205)%20Izvj%C5%A1%C4%87e%20o%20radu%20HCK%20u%202024.pdf?vel=5096156).

<sup>57</sup> Government of the Republic of Croatia: Ministers of Croatia, Slovenia and Italy discuss border situation, memorandum signed on trilateral border patrols; 20 January 2025, available at: <https://vlada.gov.hr/news/ministers-of-croatia-slovenia-and-italy-discuss-border-situation-memorandum-signed-on-trilateral-border-patrols/43687>.

<sup>58</sup> See, Border Violence Monitoring Network (BVMN), *Croatia*, available at: <https://borderviolence.eu/reports?category=monthly-report>.

The **Ombudswoman** reported that in 2024, a further decrease in the number of complaints on pushbacks to the Ombudsperson was recorded. However, the Ombudswoman also observed that Civil Society Organisations (CSO) continued to report on the collected testimonies of persons being pushed back.<sup>59</sup>

The **Ombudswoman for children** also reported that in 2024 civil society organizations continued to warn about collective expulsions on the Croatian-Bosnian border. According to data provided by Save the Children, children and adults reported violence and other humiliating actions by the Croatian police at the border, which included pushing, hitting with hands and batons, stripping, misappropriation of property and destruction of personal belongings (such as mobile phones). They reported on 1,916 identified potential refugees and migrants who were forcibly returned from Croatia, among whom were 244 children, of which 239 were unaccompanied.<sup>60</sup>

The **No Name Kitchen** (NNK) accused the Croatian border police of burning the personal belongings of people who tried to enter the country irregularly from Bosnia and Herzegovina. The report is based on NNK field research conducted between October 2023 and August 2024. The report states the existence of secret locations where the Croatian border police systematically destroy migrants' personal belongings by burning them.<sup>61</sup> This report was also published by The Guardian.<sup>62</sup> The Ministry of the Interior has denied these allegations.<sup>63</sup>

The report *Pushed, Beaten, Left to Die – European Pushback Report 2024*,<sup>64</sup> published in collaboration with NGOs from Belgium, Bulgaria, Croatia, Hungary, Latvia, Lebanon, Lithuania and Poland, analyses data on pushbacks from EU Member States to third countries in 2024. It also presents data gathered on pushbacks from Croatia according to which, in 2024, the NGO Save the Children outreach teams identified 1,905 refugees and migrants who were pushed back from Croatia, including 333 children, out of whom 228 were unaccompanied. In addition, in 2024, the Danish Refugee Council recorded 384 cases of pushbacks in January and February before ending their activities in the Una-Sana Canton in Bosnia and Herzegovina. The report highlights that there could be an overlap in the monitoring of Save the Children and Danish Refugee Council. According to the report, throughout 2024, children and adults experiencing pushbacks continued reporting violence and other humiliating and unlawful practices by the Croatian border guards, including pushing, beating by hand and batons, stripping, appropriation of property and destruction of personal belongings such as phones. Some refugees and migrants reported being pushed back from deep into the Croatian territory (Zagreb) and testified about being threatened or robbed by criminal groups operating within the Croatian territory.

The **Centre for Peace Studies (CPS)** reported a continuation of pushbacks. CPS also reported that problems with readmission procedures have been observed, causing concern that readmission procedures are being applied contrary to legislation (i.e. misused to return persons asking for asylum, vulnerable groups, and unaccompanied minors). In addition, over the past two years, the CPS has closely monitored pushbacks, mainly along the Croatian border. Previous reports and findings suggested that such pushbacks occurred exclusively in border areas. However, it is now observed that pushbacks are also being carried

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<sup>59</sup> Ombudswoman: Report of the Ombudswoman for 2024, page 270, available at: <https://www.ombudsman.hr/hr/download/izvje-e-pu-ke-pravobraniteljice-za-2024-godinu/?wpdm=20339&refresh=67efca50785f31743768144/>.

<sup>60</sup> Ombudswoman for Children: *Report on the work of the Ombudswoman for Children in 2024*, page 198, available at: <https://dijete.hr/hr/download/izvjesce-o-rad-u-pravobraniteljice-za-djecu-za-2024-godinu/>.

<sup>61</sup> No Name Kitchen: "Burned Borders: A No Name Kitchen Investigation on Illegal Croatian Police Practices.", October 2024, available at: <https://bloodyborders.org/wp-content/uploads/2024/10/Burned-Borders-No-Name-Kitchen.pdf>.

<sup>62</sup> The Guardian: Croatian police accused of burning asylum seekers' phones and passports (10 October 2024), available at: <https://www.theguardian.com/global-development/2024/oct/10/photos-croatia-police-phones-passports-asylum-seekers>.

<sup>63</sup> Ministry of the Interior: Reacting to the accusations from The Guardian's Article, 10 October 2024, available at: <https://mup.gov.hr/vijesti/reagiranje-na-optuzbe-iz-clanka-portala-the-guardian/294309>.

<sup>64</sup> Centre for Legal Aid – Voice in Bulgaria, Centre for Peace Studies, Lebanese Center for Human Rights), Foundation Mission Wings, Hungarian Helsinki Committee, I Want to Help Refugees/Gribu palīdzēt bēgļiem, 11.11.11, Sienos Grupē, We Are Monitoring Association: *Pushed, Beaten, Left to Die – European Pushback Report 2024*, page 13, available at: <https://www.cms.hr/publikacija/pushed-beaten-left-to-die-european-pushback-report-2024/>.

out from locations up to a 30-minute drive from the border, indicating that pushbacks are increasingly taking place from deeper within Croatian territory. Organizations working in Bosnia and Herzegovina reported to the CPS a sharp increase in the frequency of pushbacks and levels of police violence during the summer, with the peak in July. Reported cases included verbal abuse, forced removal of clothing – including hijabs for women – seizure of personal belongings, and physical violence. CPS also reported that Save the Children (STC) field teams operating in the border areas were the only ones providing support to refugees and migrants, including those who were pushed back from Croatia. The teams monitor the protection situation along the border, identify unaccompanied children and other children in vulnerable situations, provide child-friendly information and referrals to services, monitor transfers, and carry out case management in cooperation with social welfare centers in Bihać and Velika Kladuša. Throughout 2024, STC field teams identified 1,905 refugees and migrants who had been pushed back from Croatia, including 333 children, of whom 228 were unaccompanied. According to information provided to CPS by STC, children and adults who experienced pushbacks reported violence and other degrading and unlawful practices, including being pushed, beaten with hands and batons, stripped, having their property confiscated, and personal belongings such as mobile phones destroyed. Some migrants and refugees reported pushbacks from deeper inside Croatian territory (including Zagreb) and testified about threats or robberies carried out by criminal groups within Croatian territory. Reports of pushbacks included children who were hungry, thirsty, exhausted, frightened, and seriously affected by harsh weather conditions, with some requiring medical assistance. In one pushback case, the STC field team identified an 11-year-old Syrian girl with hearing and speech impairments who was traveling in a group of adult men.<sup>65</sup>

The **Border Violence Monitoring Network (BVMN)** also reported about pushbacks and other types of violence along the Bosnian-Croatian border.<sup>66</sup>

During the year 2024, reports of injured and dead migrants were also made. In one case, the incident occurred when a vehicle carrying nine individuals veered off the road and collided with a wall during a police pursuit and 4 migrants died.<sup>67</sup>

### Push-back practices reported by the media

The humanitarian organization No Name Kitchen (NNK) shared its report with *The Guardian*. According to the report, Croatian police allegedly confiscated and destroyed migrants' clothes, mobile phones, and passports before returning them to Bosnia and Herzegovina.<sup>68</sup> The Ministry of the Interior denied the allegations, stating that the Croatian police acts in accordance with the Schengen Borders Code and that individuals expressing their intention to seek international protection are granted access to the asylum system. The Ministry also referred to previous similar allegations that were reportedly proven unfounded.<sup>69</sup>

### Reactions from UN bodies and European human rights bodies

In August 2020, the Council of Europe's Committee for the Prevention of Torture (CPT) conducted a rapid reaction visit to Croatia to assess the treatment of migrants that attempted to enter Croatia and were apprehended by the police. The delegation visited locations in both Croatia and Bosnia and Herzegovina, interviewing and medically examining individuals who alleged they endured forced returns from within Croatian territory. The CPT noted limited cooperation from Croatian authorities, including an incomplete list of facilities where foreign nationals may be deprived of their liberty and a lack of awareness among police

<sup>65</sup> Information provided by the Centre for Peace studies, 27 February 2025.

<sup>66</sup> Border Violence Monitoring Network (BVMN), *Croatia*, available at: <https://borderviolence.eu/reports?category=monthly-report>.

<sup>67</sup> See e.g., Index, *Pursuit Near Sinj: Four Dead, Two Children Fighting for Their Lives; Police Release Details*, 16 May 2024, available in Croatian at: <https://www.index.hr/vijesti/clanak/potjera-kod-sinja-4-mrtvih-dvoje-djece-se-bori-za-zivot-policija-odrzala-presicu/2565581.aspx>; [https://www.index.hr/vijesti/clanak/bozinovic-ovo-nije-bila-klasicna-potjera-tragamo-za-jos-jednim-vozilom/2565622.aspx?index\\_ref=clanak\\_vijesti\\_najnovije\\_d](https://www.index.hr/vijesti/clanak/bozinovic-ovo-nije-bila-klasicna-potjera-tragamo-za-jos-jednim-vozilom/2565622.aspx?index_ref=clanak_vijesti_najnovije_d). Croatian police accused of burning asylum seekers' phones and passports (*Guardian*, 10 October 2024), available at: <https://www.theguardian.com/global-development/2024/oct/10/photos-croatia-police-phones-passports-asylum-seekers>.

<sup>69</sup> Ministry of Interior: *Reaction to the accusations from The Guardian Article*, 10 October 2024.



officers regarding the CPT's mandate and rights to access all documentation containing information relevant to its mandate (See [AIDA Country Report on Croatia – 2021 Update](#)).

In October 2023, UN Committee on the Elimination of Racial Discrimination (CERD) published its *Concluding observations on the combined ninth to fourteenth periodic reports of Croatia*. CERD states that the Committee is concerned about reports of cases of expulsions and pushbacks of migrants, and of excessive use of force by law enforcement officials resulting in injuries and bodily harm and accordingly recommends to Croatia to refrain from conducting collective expulsions and pushbacks, provide access to its territory for persons in need of international protection, respect the principle of non-refoulement and conduct investigations into cases of collective expulsions, pushbacks and excessive use of force and violence by law enforcement officials against migrants, refugees and asylum-seekers.<sup>70</sup>

In September 2023, the Council of Europe Expert Group on Action against Violence against Women and Domestic Violence (GREVIO) published its baseline evaluation report on Croatia.<sup>71</sup> GREVIO carried out an evaluation visit to Croatia from 17 to 21 October 2022. GREVIO's report contains a comprehensive analysis of the implementation of the provisions of the Istanbul Convention in Croatia. It acknowledges the steps taken by Croatia to comply with the Istanbul convention and identifies areas where progress is still needed. In its report on Croatia, GREVIO made some observations and recommendations which are related to migrant and asylum-seeking women. Amongst other, GREVIO stated that it was alerted about the denial of access to the territory and asylum as well as of violence and misconduct by border police at the borders with Serbia and Bosnia and Herzegovina of sufficient severity to amount to inhuman and degrading treatment contrary to Article 3 of the European Convention on Human Rights. Those reports included incidents involving women, pregnant women, female-headed households, families with children and unaccompanied and separated children. GREVIO urges the Croatian authorities to urgently identify and take action in all cases of border police violence against women to provide justice for past abuse and ensure such abuse is not permitted to take place with impunity in the future.

In addition, GREVIO strongly encourages the Croatian authorities to take measures to ensure that improvements are made in the identification, processing and protection of migrant and asylum-seeking women who are or may become victims of gender-based violence. This includes, amongst other, ensuring that all women arriving at the border are allowed to have their claim for international protection recognised and recorded; collecting quantitative and qualitative data on the number of women arriving at the border; providing standard operating procedures and gender-sensitive guidance on identifying, interviewing, processing and determining claims of gender-based violence to all officials likely to encounter migrant women. The existing standard operating procedures relating to prevention and protection in accommodation centers may serve as a good model: ensuring that adequate information is provided to women seeking asylum at the borders, in landing settings, hotspots and reception facilities to increase their awareness of their vulnerabilities and rights, their right to redress in case of mistreatment by border guards or others and facilitating their access to general and specialist support services; and monitoring and evaluating the impact of the training provided to border and migration officials.

On 18 July 2024, the Human Rights Committee adopted the *Concluding observations on the fourth periodic report of Croatia*. In its observations the Committee noted that it was concerned by reports of the denial of access to the territory and to asylum procedures for persons entering irregularly from Bosnia and Herzegovina and Serbia and their forced return without any individual screening of their claims or needs. The Committee also highlighted that it was concerned by reports of the excessive use of force, inhuman and degrading treatment, extortion and theft of property by Croatian border control personnel, notably in the context of the pushbacks of migrants and asylum-seekers into the territory of Serbia and Bosnia and Herzegovina, and the very limited efforts to hold those responsible to account. The Committee stressed that Croatia should ensure effective access to a fair and efficient asylum procedures for all persons in need

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<sup>70</sup> United Nations, Committee on the Elimination of Racial Discrimination, *Concluding observations on the combined ninth to fourteenth periodic reports of Croatia*, CERD/C/HRV/CO/9-14, 2 October 2023, available at: <https://bit.ly/3xdOIYe>, 8.

<sup>71</sup> GREVIO, (Baseline) *Evaluation Report on legislative and other measures giving effect to the provisions of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention)-CROATIA*, 26 May 2023, available at: <https://bit.ly/4bdxB10>.

of international protection and should also ensure that all relevant officials, including border control personnel, receive adequate training on international standards, including on the principle of *non-refoulement* and the human rights of migrants, including those of children, and that all allegations of pushbacks and ill-treatment at borders are promptly, thoroughly and independently investigated and the perpetrators, if found guilty, are punished with sanctions commensurate with the seriousness of the offence.<sup>72</sup>

### Litigation on pushback practices and relevant complaints

In the case *M.H. and others v. Croatia*, concerning an Afghan family of 14, the ECtHR found that Croatia had violated several Articles of the ECHR. According to the complainants, the mother and her six children were pushed back by Croatian authorities in November 2017 after crossing the border from Serbia. The group was intercepted by Croatian police officers while resting in a field and despite expressing the wish to seek asylum they were taken back to the border and told to return to Serbia by following a train track in the area. As a train passed, it hit one of the children, a six-year-old girl that died following the incident. On 21 March 2018, Croatian authorities apprehended the applicants, who had attempted a second crossing. Despite expressing a wish to apply for asylum they were detained in a transit immigration centre in Tovarnik. In its judgment, the ECtHR found several violations of the ECHR including ineffective investigation into the child's death (Article 2 procedural aspect), degrading treatment of child applicants detained for a period above two months (Article 3 substantive aspect), failure to demonstrate required assessment, vigilance and expedition in proceedings in order to limit family detention as far as possible (Article 5 § 1), restriction of contact with the chosen lawyer, pressure placed on the lawyer aimed at discouraging pursuit of case (Article 34), and collective expulsion by Croatian police outside official border crossing and without prior notification of Serbian authorities (Article 4 § 4). In April 2022, in the case *M.H. and Others v. Croatia*,<sup>73</sup> the ECtHR's Grand Chamber panel of five judges rejected the Croatian request for referral and the judgement became final.<sup>74</sup>

The organisation Centre for Peace Studies – who intervened in the case – and activist alliance Are You Syrious called for the interior minister and others responsible within the police to be dismissed in light of the ruling. In December 2022, the Action plan was published.<sup>75</sup> The plan concerns measures that the authorities have taken to bring the violations to an end and to provide redress to the applicants. The Centre for Peace Studies and the Human Rights House Zagreb prepared recommendations for the execution of the judgment of *M.H. and Others against Croatia*.<sup>76</sup>

In 2023, Centre for Peace Studies and the Human Rights House Zagreb prepared second recommendations for the execution of the judgment of *M.H. and Others against Croatia*.<sup>77</sup> With this submission, the organisations gave proposals for measures to execute the judgment and prevent further violations of the human rights of refugees and other migrants in Croatia. The aim of submission is to inform the Committee of Ministers that the measures proposed by the Government are not sufficient for the appropriate implementation of the judgement. Centre for Peace Studies and the Human Rights House Zagreb, stated that individual measures have been ineffective and insufficient. Regarding the general measures, they stated that structural and complex problems amounting to systematic human rights violations have continued and are still ongoing in Croatia.<sup>78</sup>

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<sup>72</sup> Human Rights Committee: Concluding observations on the fourth periodic report of Croatia, available at: [https://digitallibrary.un.org/record/4061868/files/CCPR\\_C\\_HRV\\_CO\\_4-EN.pdf?ln=en](https://digitallibrary.un.org/record/4061868/files/CCPR_C_HRV_CO_4-EN.pdf?ln=en).

<sup>73</sup> ECtHR, Judgment in the case of *M.H. and others v. Croatia* (Applications nos. 15670/18 and 43115/18), available at: <http://bit.ly/3yWYBRT>.

<sup>74</sup> ECtHR: Grand Chamber Panel's decisions - April 2022, Press Release - Referrals to Grand Chamber, published on April 4, 2022, available at: <https://bit.ly/3z0Pol9>.

<sup>75</sup> ECtHR: Action Plan-Communication from Croatia concerning the case of *M.H. and Others v. Croatia* (Application No. 15670/18), available at: <http://bit.ly/3LLIVJH>.

<sup>76</sup> *Recommendations of the Centre for Peace Studies and the Human Rights House Zagreb for the execution of the judgment of M.H. and Others against Croatia*, available at: <https://bit.ly/42Rajdg>.

<sup>77</sup> Final recommendations of the Centre for Peace Studies and the Human Rights House Zagreb for the execution of the judgment of *M.H. and Others against Croatia*, 28 July 2023, available at: <https://bit.ly/3XscvZq>.

<sup>78</sup> Human Rights House Zagreb and the Centre for Peace Studies *RULE 9.2. COMMUNICATION in accordance with the Rules of the Committee of Ministers regarding the supervision of the execution of judgments and of*



In July 2024, the Centre for Peace Studies and the Human Rights House Zagreb submitted a final communication to the Committee of Ministers of the Council of Europe, in accordance with Rule 9.2 of the Rules of the Committee of Ministers for the supervision of the execution of judgments and terms of friendly settlements, in the case of *M.H. and Others v. Croatia*.<sup>79</sup> With this third submission, they are calling on the Government of the Republic of Croatia to adopt a concrete action plan that includes an effective investigation, the sanctioning of those responsible, and compensation to the family. They also demand systemic changes to end unlawful pushbacks, ensure accountability, and establish effective oversight of police conduct and adherence to the rule of law in Croatia.<sup>80</sup>

The Ombudsperson, as a member of the Expert Council for the execution of judgments and decisions of the ECtHR, in 2023, proposed improvements to the Action Plan, judging that the proposed measures are not sufficient and do not address every conclusion and recommendation of international bodies and organisations to which the judgment refers. Given that the Ombudsperson's proposals were not adopted to a satisfactory extent, the Ombudsperson, as a national institution for the protection of human rights, used the possibility to communicate its remarks and proposals directly to the Committee of Ministers of the Council of Europe in September 2023. The Ombudsperson proposed the establishment of a specialised department or designation of persons specially in charge of these issues within the State attorney's offices, to deal with criminal charges against police officers. The Ombudsperson also proposed creating special protocols for such cases. Keeping in mind the numerous negative effects that deprivation of children's freedom has on their physical and mental health and development, the Ombudsperson recommended the development of a plan to ban the placement of children in reception centres for foreigners, especially in cases of long-term deprivation of liberty, as was the case with the brothers and sisters of the deceased girl in the case *M.H. and Others v. Croatia*. The Ombudsperson also proposed providing attorneys at law with unimpeded access and CSOs with effective access to reception centres for foreigners; establishing a system of accountability that would enable effective investigation of pushbacks and collective expulsion of migrants; providing the institution of the Ombudsperson with systematic and continuous access to data; as well as a series of measures aimed at informing migrants about their rights.<sup>81</sup>

The case is under enhanced supervision before the Committee of Ministers.<sup>82</sup>

In its 2023 Annual Report,<sup>83</sup> the Committee of Ministers reported that it “examined *M. H. and Others v. Croatia*, concerning *inter alia* the collective expulsion of a family of asylum-seekers along the railway line at the Croatian border with Serbia and the lack of effective investigation into the death of one of the children who was hit by a train, as well as the detention of the family in prison type conditions which violated the right of minor children under Article 3. It took note of the *ex officio* reopening of the criminal investigations on the circumstances leading to the death of the child and asked for the examination of all available evidence and proper involvement of the applicants and their legal representative in the investigation. The Committee welcomed the establishment of the independent border monitoring mechanism, the first of its kind in all Member States, and noted also the efforts to make the asylum procedure more accessible, including the translation of the asylum information in various languages. The Committee invited the authorities to provide information on the steps taken to limit the detention of children in immigration centres with prison-type elements; and noted with interest the introduction of a regular *ex officio* judicial review of detention orders as well as a positive trend in the application of alternative measures to immigration detention and the efforts taken by the authorities to ensure the police, including the border police act with diligence in asylum proceedings.”

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terms of friendly settlements in the Case of *M.H. and Others v. Croatia* No. 15670/18 and 43115/18, 18 July 2023, available in English at: <https://bit.ly/3VMzAVL>.

<sup>79</sup> Centre for Peace Studies, Human Rights House Zagreb: Communication to the Committee of Ministers of the Council of Europe, 26 July 2025, available at: [https://www.cms.hr/wp-content/uploads/CPS\\_HRHZ\\_Rule\\_9.2\\_M.H.\\_July\\_2024.pdf](https://www.cms.hr/wp-content/uploads/CPS_HRHZ_Rule_9.2_M.H._July_2024.pdf).

<sup>80</sup> Information provided by the Centre for Peace Studies, 27 February 2025.

<sup>81</sup> Ombudswoman, Report of the Ombudswoman for 2023, available in Croatian at: <https://bit.ly/4crt2kR>.

<sup>82</sup> CoE, Department for the execution of judgements of the European Court of Human Rights, *Croatia: Main issues*, 18 February 2025, available at: <https://rm.coe.int/mi-croatia-eng/1680a23c83>.

<sup>83</sup> Committee of Ministers, *17th Annual Report of the Committee of Ministers*, April 2024, available at: <https://bit.ly/4eG1xGf>, 55.

With regard to the criminal investigation into the child's death that was reopened *ex officio*, investigative actions were taken throughout 2022 and 2023, including interviews with key witnesses and suspects. However, on 24 May 2024, prosecutors dismissed the criminal complaint against three police officers, citing insufficient grounds for prosecution. The decision was communicated to the applicants' lawyer.<sup>84</sup>

The Ombudswoman for Children in her report for 2024 stated that the office is monitoring the Decisions of the Committee of Ministers of the Council of Europe from September 2023 regarding the supervision of the execution of the judgment *M.H. and others against Croatia*. The aforementioned Decisions relate to the monitoring of the execution of the judgment in the form of implementing individual measures to continue the investigation, but also general measures, such as the importance of establishing an independent border control mechanism, treating migrants in accordance with the ECHR, improving access to the asylum procedure and limiting the detention of children in detention centres. The case of *M.H. and Others against Croatia* is under enhanced supervision, as a result of which the Republic of Croatia is obliged to develop an Action Plan by March 2025, which presents the measures that the State has taken and intends to take to implement the judgment.<sup>85</sup>

In 2022, a Rohingya child submitted complaints against Croatia and Slovenia before the UN Committee on the Rights of the Child for multiple violations of the Convention on the Rights of the Child (CRC). After many years looking for protection, he spent over a year in Bosnia and Herzegovina from 2020 to 2021, having to survive without State support or medical care, sleeping rough in forests and squatting in abandoned buildings. During this time, he was pushed back five times from Croatia to Bosnia and Herzegovina. In Slovenia, he was subjected to a "chain" pushback, by which he was forcibly returned first to Croatia by Slovenian authorities and then onwards by Croatian authorities to Bosnia and Herzegovina. The child faced beatings by Croatian border officers, had his belongings burnt and his shoes confiscated. The applicant's complaints argue violations of the CRC, in relation to his expulsions and ill-treatment, and the States' failure to assess his age or apply any of the relevant safeguards under Articles 3, 8, 20(1), and 37 CRC. The child corroborated his accounts with a range of digital evidence. The complaints were filed against Croatia and Slovenia with the support of ECCHR and Blindspots.<sup>86</sup> In January 2024, the Border Violence Monitoring Network submitted a Third Party Intervention in the mentioned case to the UN Committee on the Rights of the Child.<sup>87</sup> In its submission, BVMN tried to demonstrate the *modus operandi* of chain pushbacks involving Slovenia and Croatia. The report focuses mainly on incidents happening in 2020 and 2021, to cover the period at issue in the present case, but BVMN argues that more recent data were also highlighted to show that these practices still take place.

In 2024, the NGO No Name Kitchen (NNK) submitted a request for response regarding torture, inhuman, and degrading treatment by the Croatian border authorities to the UN Special Rapporteur on Torture.<sup>88</sup> The submission, as stated by NNK, presents detailed evidence of torture, inhuman, and degrading treatment carried out by Croatian border authorities against people on the move.

## 1.2. Border monitoring

The Independent Monitoring Mechanism for the Conduct of Police Officers of the Ministry of the Interior in the Area of Irregular Migration and International Protection (IMM) was established by a Cooperation Agreement in June 2021. The signatories of the Cooperation Agreement were the Ministry of the Interior of

<sup>84</sup> *M.H. and Others v. Croatia*, Status of Execution, available at: [https://hudoc.exec.coe.int/eng#{%22execidentifier%22:\[%22004-60187%22\]}](https://hudoc.exec.coe.int/eng#{%22execidentifier%22:[%22004-60187%22]}).

<sup>85</sup> Ombudswoman for Children: *Report on the work of the Ombudswoman for Children in 2024*, page 199, available at: <https://dijete.hr/hr/download/izvjesce-o-radu-pravobraniteljice-za-djecu-za-2024-godinu/>.

<sup>86</sup> ECCHR, *Rohingya child challenges Croatia and Slovenia over violent pushbacks*, 6 July 2022, available at: <https://bit.ly/3PDQ0wG>.

<sup>87</sup> Border Violence Monitoring Network: Third Party Intervention in the case *U.F. v Croatia and Slovenia* to the UN Committee on the Rights of the Child, 5 January 2024, available at: [https://borderviolence.eu/app/uploads/BVMN\\_TPI\\_UNCRC\\_UFvCroatiaSlovenia-1.pdf](https://borderviolence.eu/app/uploads/BVMN_TPI_UNCRC_UFvCroatiaSlovenia-1.pdf) and [https://www.ecchr.eu/fileadmin/user\\_upload/BVMN\\_TPI\\_Submission\\_UF\\_vs.\\_Croatia\\_and\\_Slovenia.pdf](https://www.ecchr.eu/fileadmin/user_upload/BVMN_TPI_Submission_UF_vs._Croatia_and_Slovenia.pdf).

<sup>88</sup> No Name Kitchen: *Request for response regarding torture, inhuman, and degrading treatment by the Croatian border authorities*, 26 September 2024, available at: [https://www.nonamekitchen.org/wp-content/uploads/2024/10/UNSPR\\_Sept24\\_Torture.pdf](https://www.nonamekitchen.org/wp-content/uploads/2024/10/UNSPR_Sept24_Torture.pdf).

the Republic of Croatia (Mol), on the one hand, and the the Croatian Academy of Medical Sciences (CAMS), the Croatian Academy of Legal Sciences (CALS), the Centre for the Culture of Dialogue (CCD), the Croatian Red Cross (CRC), and a law professor as an independent legal expert, on the other hand.

Initially the IMM was established for a one-year period with the possibility of extension, while activities were planned to be carried out at the Croatian border (border crossings / police stations / police administrations) with Bosnia and Herzegovina, Montenegro and the Republic of Serbia and in the reception centres for foreigners. During that time, the IMM conducted 20 monitoring visits (both announced and unannounced). In December 2021, the IMM published its First Semi-Annual Report.<sup>89</sup> In June 2022, the IMM published its Annual Report for the period June 2021 – June 2022.<sup>90</sup> More information on IMM's findings can be found in the previous update of the present AIDA report.<sup>91</sup>

A second agreement<sup>92</sup> was signed in November 2022 to be implemented for a period of 18 months with automatic extension, through announced and unannounced visits to police stations, police administrations, the external border, including the green border, at the border crossings with Bosnia and Herzegovina, Montenegro and Serbia, as well as in the Reception Centre for Applicants of International Protection and in reception centres for foreigners.<sup>93</sup>

The monitoring activities consist of: announced monitoring visits to all locations listed above as well as unannounced monitoring visits to all listed locations, including the green border; access to specific case files; access to the case file of the subject under observation; access to finalized case files concerning submitted complaints regarding alleged unlawful conduct towards irregular migrants and applicants for international protection and access to activities and reports of the Mol's Police Directorate related to alleged unlawful conduct towards irregular migrants and applicants for international protection. According to the Cooperation Agreement, the activities of the Independent Monitoring Mechanism include 20 annual visits (announced and unannounced).

The direct activities of the Independent Monitoring Mechanism are carried out by monitors. Within 15 days from the date of signing the Cooperation Agreement, the Coordination Committee shall appoint two monitors from each civil society organization that is a signatory to the Agreement.

Within seven (7) days after the monitoring visits, monitors shall jointly compile an individual report and submit it to the Coordinating Committee.

The Ombudsperson reported that during 2023, the IMM has published neither an annual nor semi-annual report on its work.<sup>94</sup>

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<sup>89</sup> Independent Monitoring Mechanism: First Semi-Annual Report, available at: <https://www.nmn.hr/UserDocsImages/dokumenti/1.%20SEMI-ANNUAL%20REPORT%2030%20JUNE%202022.pdf?vel=2001053>.

<sup>90</sup> Independent Monitoring Mechanism: Annual Report of the Independent Mechanism of Monitoring the actions of police officers of the Ministry of the Interior in the area of illegal migration and international protection, June 2021 – June 2022; available at <https://www.nmn.hr/UserDocsImages/dokumenti/Annual%20report%20of%20the%20Independent%20monitoring%20mechanism%20-%201%20July%202022.pdf?vel=2061078>.

<sup>91</sup> AIDA, *Country Report: Croatia, 2022 Update*, June 2023, available at: <https://bit.ly/3xp0QQG>.

<sup>92</sup> Cooperation Agreement to Implement an Independent Monitoring Mechanism on the Protection of Fundamental Rights in Actions of Police Officers of the Ministry of the Interior in the Area of Border Surveillance, Irregular Migration and International Protection; available in Croatian at: <https://www.hck.hr/UserDocsImages/Nezavisni%20mehanizam/Sporazum%20o%20suradnji%20radi%20provedbe%20nezavisnog%20mehanizma.pdf?vel=2506032> and in English at: [https://www.hck.hr/UserDocsImages/Nezavisni%20mehanizam/22\\_146%20Sporazum%20NMN-final\\_EN.pdf?vel=217379](https://www.hck.hr/UserDocsImages/Nezavisni%20mehanizam/22_146%20Sporazum%20NMN-final_EN.pdf?vel=217379).

<sup>93</sup> Ministry of Interior: A cooperation agreement was signed for the implementation of an independent monitoring mechanism for the protection of fundamental human rights in the conduct of police officers of the Ministry of Interior in the field of border protection, illegal migration and international protection; available at: <http://bit.ly/3JGyjs>.

<sup>94</sup> Ombudswoman, Report of the Ombudswoman for 2023, available in Croatian at: <https://bit.ly/4crt2kR>.

The IMM's semi-annual report covering the period from November 2022 to July 2024 (monitoring activities carried out from 1 June to 31 December 2023) was published in July 2024.<sup>95</sup> According to the Report,<sup>96</sup> due to issues in the implementation of the Mechanism's activities, including challenges in the disbursement of project funds and communication difficulties, the publication of the Semi-Annual Report and all related agreed activities (such as the launch of the website, etc.) were delayed.

The Semi-Annual Report covers the following periods:

- a) From November 2022, when the second Cooperation Agreement was signed, until 15 June 2023, when monitoring activities commenced. During this period, the IMM carried out a large portion of the activities defined by the Agreement. However, monitoring activities were not conducted due to numerous inconsistencies within the project itself, which the MoI subsequently presented to the signatories of the Agreement.
- b) From 15 June 2023 to 31 December 2023, 53 on-site monitoring visits were conducted, which served as the primary basis for the preparation of the Semi-Annual Report. During this period, the IMM also carried out other activities defined by the Agreement, as well as additional activities not explicitly outlined in the Agreement. During this time, the IMM did not regularly process payments for expenses and compensations to the members of the IMM, mainly due to administrative reasons.
- c) From 31 December 2023 to 23 July 2024, basic activities and four on-site monitoring visits were carried out, primarily triggered by information received via media reports or emails warning of potential human rights violations against migrants. The statistics included in Semi-Annual Report also cover this period, which, although not formally part of the Semi-Annual Report, is considered equally relevant to the IMM's work.

The report also states that the Chair of the IMM's Coordination Committee resigned from the position in September 2023, and that position remained unfilled by the time the report was written in July 2024.

Out of a total of 53 monitoring visits conducted between 1 June 2023 and 31 December 2023, 43 visits were unannounced (81%), while 10 were announced (19%). The monitoring covered a total of 20 locations, including: border police stations, border crossing points, police stations, transit reception centres, and reception centres for foreigners. In addition to independent monitoring visits, observers also conducted joint visits in cooperation with FRONTEX personnel at the Bajakovo Border Police Station on 27 September 2023, and at the Stara Gradiška Border Police Station.

According to the report, special attention was given to border crossings in the far eastern and southern parts of the border, due to reports received regarding the conduct of police officers. Furthermore, interviews with migrants were conducted by IMM without the presence of police officers, with the aim of identifying every step of the procedure prior to their arrival at reception centres, in order to provide the most accurate possible representation of how the entire system operates.

The report states that findings indicate that, in terms of infrastructure, reception centres, border police stations, and police stations are adequate for both long-term and short-term accommodation of migrants. Depending on the location where migrants are apprehended and the required duration of their stay, they are transported to facilities where accommodation is appropriate for both the length of their stay and the number of individuals. In cases where improvements were necessary in this area, monitors issued recommendations (e.g., to the Ston Police Station and Gruda Border Police Station). Based on a standardized questionnaire, monitors collect data related to the location of monitoring, individuals

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<sup>95</sup> Ombudswoman: Report of the Ombudswoman for 2024, page 268, available at: <https://www.ombudsman.hr/hr/download/izvje-e-pu-ke-pravobraniteljice-za-2024-godinu/?wpdmdl=20339&refresh=67efca50785f31743768144/>.

<sup>96</sup> Independent Monitoring Mechanism: Semi-annual report of the independent monitoring mechanism on the conduct of police officers of the Ministry of the Interior in the area of border protection, irregular migration, and international protection, July 2024, available at: <https://www.nmn.hr/UserDocsImages/dokumenti/SEMI-ANNUAL%20REPORT%20-%202024.pdf?vel=1897403>.

interviewed, the conduct of police officers, the Mol's information system, conditions related to accommodation and food, transportation (marked and unmarked vehicles, particularly for vulnerable groups), availability of access to international protection procedures, availability of translation and interpreters, and all other aspects relevant to the protection of the rights of irregular migrants.

In 2024, the IMM established a webpage.<sup>97</sup> A contact form is available at the website,<sup>98</sup> through which information on actions taken by police officers of the Mol in the area of border surveillance, irregular migration and international protection can be submitted. However, a disclaimer included on the site indicates that IMM is not a complaint-based mechanism (i.e., it is not a prosecutorial or judicial monitoring mechanism), and is thus not empowered to take up individual complaints.

The Ombudswoman, together with the European Commission, the EU Fundamental Rights Agency, Frontex Fundamental Rights Officer, IOM Croatia, UNHCR Croatia and the Ombudsman for Children, participated in the work of the IMM Advisory Board, with the task of providing guidance for improving the independence and effectiveness of that body. However, the Ombudswoman withdrew from the membership of the IMM Advisory Board in March 2025.<sup>99</sup>

The Ombudswoman states that the role of the IMM in dealing with complaints is unclear. On the one hand, the IMM website states that "*the IMM is not a complaint mechanism*". However, it is evident from IMM's Reports that the IMM did act on complaints in the past. Back in the Ombudswoman Report for 2022, it was emphasized that the IMM, as a mechanism established by an agreement, should not take over the responsibility of legally established institutions responsible for investigating allegations of illegalities or irregularities in police work, and that any (new) mechanism should have clear and transparent statutory powers.<sup>100</sup>

In 2024, UNHCR and the Croatian Law Centre in cooperation with the Ministry of Interior organised and held three workshops on access to the international protection system and protection of vulnerable groups for the border police officials. Lectures were held on the following topics: human rights of the persons on the move and access to the asylum system, recognition and protection of vulnerable groups, techniques of interviewing vulnerable groups, responsibility of police officers regarding the prevention of irregular migration. The lecturers were law professors, the Croatian Red Cross, the Women's Room, and the CLC. Altogether, 47 police officers attended the trainings.

In 2023, the Directorate for European Affairs, International Relations, and European Union Funds of the Ministry of Interior adopted a Decision on the direct allocation of financial resources for the implementation of the project "Basic Rights Course for Border Police Officers" within the Integrated Border Management Fund. The purpose of the project is to strengthen the capacity of border police officers, to perform tasks of surveillance of the external border of the EU, applying the principles of fundamental human rights as well as measures and actions undertaken to prevent and detect irregular entry and stay of persons as well as suppression of cross-border crime.<sup>101</sup>

### 1.3. Legal access to the territory

Based on the 2015 Decision on relocation and resettlement of third-country nationals or stateless persons who meet the conditions for approval of international protection,<sup>102</sup> Croatia committed to accept 150 people through resettlement. Due to the high number of people who withdrew from the process during the selection

<sup>97</sup> Available at <https://www.nmn.hr/?id=6>.

<sup>98</sup> The contact form is available at: <https://www.nmn.hr/contact/32>.

<sup>99</sup> Ombudswoman: Report of the Ombudswoman for 2024, page 268, available at: <https://www.ombudsman.hr/hr/download/izvje-e-pu-ke-pravobraniteljice-za-2024-godinu/?wpdmdl=20339&refresh=67efca50785f31743768144/>.

<sup>100</sup> Ombudswoman: Report of the Ombudswoman for 2024, page 275, available at: <https://www.ombudsman.hr/hr/download/izvje-e-pu-ke-pravobraniteljice-za-2024-godinu/?wpdmdl=20339&refresh=67efca50785f31743768144>.

<sup>101</sup> Ministry of Interior, *Basic rights course for border police officers*, 17 October 2023, available at: <https://bit.ly/4c7E8M0>.

<sup>102</sup> Official Gazette 78/2015, 17 July 2015, available in Croatian at: <https://bit.ly/3xkl6So>.



missions, this quota was filled in October 2018 following four selection missions. By way of illustration, another mission took place in February 2019, during which 141 Syrian refugees identified by UNHCR were interviewed and 103 selected for resettlement.<sup>103</sup> In addition, Croatia continued to implement the 2017 Decision on resettlement of third-country nationals or stateless persons who meet the conditions for approval of international protection, which required Croatia to accept up to 100 persons.

In 2019, Croatia fulfilled its pledge within the EU resettlement scheme to effectively resettle 250 Syrian refugees from Türkiye, according to the Decisions on Relocation and Resettlement of Third-country Nationals or Stateless Persons Eligible for International Protection from 2015 (150 persons) and 2017 (100 persons).<sup>104</sup>

A Decision on the resettlement of third-country nationals or stateless persons who meet the conditions for approval of international protection for 2019 entered into force in February 2019.<sup>105</sup> The Decision foresaw that Croatia would accept up to 150 persons through resettlement or would participate in other forms of solidarity with EU Member States. However, in 2022 a Decision to revoke the Decision on resettlement of third country nationals or stateless persons who meet the conditions for approval of international protection for 2019 was issued.<sup>106</sup>

Although the Ministry of Interior reported in previous years that they do not keep statistics on the average duration of the resettlement process, they stated that the procedure from the receipt of the file from UNHCR to the transfer of refugees to Croatia lasts around six months on average.

In addition, a new Decision on relocation of the third country nationals or stateless persons who meet the conditions for approval of international protection was adopted in July 2022.<sup>107</sup> In accordance with the aforementioned decision, Croatia is to participate in the relocation of 60 third-country nationals or stateless persons who meet the conditions for granting international protection from Greece, Cyprus, Italy, Malta and Spain. Based on that decision, on 1 March 2023, Croatia accepted 10 applicants for international protection from Italy, as part of voluntary programme of solidarity with EU Member states under great migration pressure. Applicants were citizens of the Ivory Coast (three married couples, one of whom has a minor child, and three single men). The mentioned persons arrived in Croatia accompanied by IOM employees.<sup>108</sup> According to information provided by IOM, in 2023, IOM assisted in the relocation of migrants from Italy to Croatia by purchasing travel tickets, organising travel, stabilising their health condition before departure, assisting in transit and operational escort.<sup>109</sup>

In May 2023, the European Commission kicked off the new pledging exercise for a 2-year period (2024 and 2025), inviting countries to submit their national commitments. Croatia has pledged to resettle 100 persons over the period 2024-2025.<sup>110</sup>

Implementation of the *Decision on Relocation of Citizens of Third Countries or Stateless Persons who meet the Conditions for Approval of International Protection*, adopted by the Croatian Government in July 2022, continued throughout 2024. In 2024, a total of 28 individuals seeking international protection were relocated from Italy to Croatia.<sup>111</sup>

Apart from that, in response to the call of the European External Action Service (EEAS) for evacuations from Afghanistan of people whose lives and security were endangered by the arrival of the Taliban regime,

<sup>103</sup> SHARE, *Integration Magazine*, April 2019, available in English at: <https://bit.ly/4cmAoWE>.

<sup>104</sup> EMN, *Bulletin*, November 2019, available at: <https://bit.ly/3KUi6Ad>.

<sup>105</sup> Official Gazette 16/2019.

<sup>106</sup> Official Gazette 88/2022, available at: <http://bit.ly/3ILCA5g>.

<sup>107</sup> Official Gazette 88/2022, available at: <https://bit.ly/3KNVO3f>.

<sup>108</sup> Ministry of Interior: *Ten people arrived in the Republic of Croatia as part of the relocation mechanism*, 3 March 2023, available in Croatian at: <https://bit.ly/4c5DxdR>.

<sup>109</sup> Information provided by IOM, 29 January 2024.

<sup>110</sup> European Commission: Pledges submitted by the Member States for 2024-2025.

<sup>111</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).

Croatia accepted 41 Afghan nationals between August and December 2021, including 16 children. Most were granted asylum, while three left Croatia to reunite with family members.<sup>112</sup>

There is no humanitarian visa foreseen under Croatian legislation for persons in need of international protection.

From January 2022, the Croatian Law Centre implemented the project "*Complementary pathways for Southeast Europe - COMP4SEE*". The project aimed to contribute to the development of complementary pathways by creating new models of private sponsorship and by making and advocating for recommendations for improving national systems in the area of family reunification.<sup>113</sup> Through this project, by the end of June 2024, 17 families of refugees have been successfully reunited in Croatia. In particular, 17 individuals granted international protection in Croatia were reunited with 23 family members.<sup>114</sup>

## 2. Preliminary checks of third country nationals upon arrival

### Indicators: Preliminary checks at the arrival point

1. Are there any checks that are applied systematically or regularly at the point of entry when a person enters the territory? ☐ Yes ☐ No
2. Is the person considered under law to have entered the territory during these checks? ☐ Yes ☐ No

Although national legislation at the moment does not foresee a preliminary screening procedure, the Ordinance on the Treatment of Third-Country Nationals prescribes that a third-country national found at an external border during or immediately after an irregular entry shall be issued a Notification Form on Procedures at the External Border, which must be signed by both the third-country national and a police officer.<sup>115</sup> If the individual does not possess identity documents, or if there are doubts regarding their identity, they are required to complete a Personal Data Declaration Form in written format.<sup>116</sup> In cases where the person is identified as vulnerable or suffering from a serious health condition, appropriate protection and assistance measures are to be undertaken.<sup>117</sup>

The Notification Form informs the person of their return to the country from which they irregularly entered Croatia, and includes a clear instruction to immediately inform the police officer if they are: an unaccompanied child, a person with a disability, an elderly person, a pregnant woman, a single parent with one or more minor children, a victim of human trafficking, a survivor of torture, rape, female genital mutilation, or another form of psychological, physical, or sexual violence, or a person with mental health issues. Additionally, the form instructs the individual to inform the police officer if they suffer from a serious health condition, or if they fear return to their country of origin due to a risk of persecution based on race, religion, nationality, membership in a particular social group or political opinion, or due to the risk of torture, inhuman or degrading treatment or punishment.<sup>118</sup>

<sup>112</sup> Ombudsperson, *Annual report 2021*, available in Croatian at: <https://bit.ly/3v5TsVi>.; Ombudsperson for Children: *Report on the work of the Ombudsman for Children in 2021*, available in Croatian: <https://bit.ly/3KzksTm>

<sup>113</sup> Croatian Law Centre, *Complementary pathways for Southeast Europe -COMP4SEE*, available at: <https://bit.ly/3xkIIINi>.

<sup>114</sup> Croatian Law Centre, *Successfully Reunited 17 Refugee Families*, 2 July 2024, available at: <https://www.hpc.hr/en/2024/07/02/successfully-reunited-17-refugee-families/>.

<sup>115</sup> Article 33 (2) Ordinance on the Treatment of Third-Country Nationals.

<sup>116</sup> Article 33 (5) Ordinance on the Treatment of Third-Country Nationals.

<sup>117</sup> Article 33 (6) Ordinance on the Treatment of Third-Country Nationals.

<sup>118</sup> Form 12, Ordinance on the Treatment of Third-Country Nationals.

### 3. Registration of the asylum application

#### Indicators: Registration

1. Are specific time limits laid down in law for making an application? ☐ Yes ☒ No  
❖ If so, what is the time limit for lodging an application?
2. Are specific time limits laid down in law for lodging an application? ☒ Yes ☐ No  
❖ If so, what is the time limit for lodging an application? 15 days
3. Are registration and lodging distinct stages in the law or in practice? ☒ Yes ☐ No
4. Is the authority with which the application is lodged also the authority responsible for its examination? ☒ Yes ☐ No
5. Can an application be lodged at embassies, consulates or other external representations? ☐ Yes ☒ No

#### 3.1. Making and registering the application

Although no time limit is specified in the LTP, a foreigner is in practice expected to seek international protection (i.e., express the intention to lodge an application) at border crossing points during the border control, and if already in the territory of the Republic of Croatia at a police administration or at a police station, within a reasonable time after entering the country. Intention can be expressed in Reception Centre for Foreigners or in extraordinary circumstances in order to allow access to the procedure for granting international protection in the Reception Centre for Applicants for International Protection.

In 2024, in total 26,776 intentions to lodge applications for international protection were expressed (19,907 by male applicants and 6,869 by female applicants), out of which 1,980 were expressed by unaccompanied children. This indicates a decrease in the total number of applicants but an increase in the number of unaccompanied children applicants compared to 2023,<sup>119</sup> when 1,516 unaccompanied children expressed their intention to apply for international protection.<sup>120</sup>

Out of the total number of intentions, the largest number of intentions to apply for international protection was expressed at border police stations, police stations and police administrations (25,739). Most intentions were expressed at the Stara Gradiška border police station (3,681), followed by the Slavonski Brod border police station (3,119) and the Dvor border police station (2,378). 296 applicants for international protection expressed their intention to apply for international protection at airport police stations, mostly in Zagreb (Pleso) (293), followed by Zadar (2) and Split (Resnik) (1). 195 applicants for international protection expressed their intention to apply for international protection in detention centres (i.e. at the Reception Centre for Foreigners in Ježevu (90), the Transit Reception Centre in Tovarnik (34), and the Transit Reception Centre in Trilj (71)), showing a 5% increase of intentions registered in detention compared to 2023.<sup>121</sup>

In practice, a person may express such an intention even after having been found irregularly crossing the State border or at a later stage, during further proceedings related to irregular border crossing. After the foreigner has been apprehended and transferred to a police administration or station, the police officer makes a report and hands the person over to officers in charge of irregular migration for further proceedings. These police officers will conduct an interview with the foreigner in the police station to determine the person's identity, perform a security check and conduct an informative interview. If the foreigner expresses the intention to seek international protection at any stage of this procedure, the procedure should be suspended and the person will have the right to stay in Croatia until a final decision is taken on the

<sup>119</sup> Ministry of Interior, Statistics 2024, available at: <https://mup.gov.hr/UserDocsImages/statistika/2025/1/Statistika%20medjunarodna%20zastita%202024.xlsx>.

<sup>120</sup> Ministry of Interior, Statistics 2023, available at: <https://mup.gov.hr/UserDocsImages/statistika/2025/1/Statistika%20medjunarodna%20zastita%202024.xlsx>.

<sup>121</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).



application for international protection. However, many problems have been reported since 2017 in accessing the territory and the asylum procedure (see [Access to the Territory](#)).

Police officers, immediately following the expression of intention, shall take the applicant's fingerprints and shall photograph the applicant, establish the applicant's identity and the manner of arrival in Croatia, the travel route from the country of origin to Croatia, and personal circumstances of importance for assessing the reception and procedural guarantees.<sup>122</sup> If due to justified reasons, police officers are unable to perform those tasks, such tasks shall exceptionally be performed by the officials of the Service for the reception and accommodation of applicants for international protection in the Reception Center for Applicants for International Protection.<sup>123</sup> Border officers, the police station / police administration, the Reception Centre for Foreigners or the Reception Centre for Applicants for International Protection shall register the applicant in the records of the Ministry of Interior no later than three working days from the day the applicant expressed the intention to apply for international protection. If the intention was expressed before other body, the Reception Centre for Applicants for International Protection shall register the applicant in the records of the Ministry within six working days from the day when they expressed their intention.<sup>124</sup> The authority which undertook the registration shall issue a certificate of registration of the applicant in the records of the Ministry and if necessary determine the time period within which they must report to the Reception Centre for Applicants for International Protection<sup>125</sup> to lodge the application.<sup>126</sup>

The Border Directorate reported in 2018 that, according to Standard Operational Procedures (SOP) for the police in relation to the asylum procedure, police officers are not competent for assessing the reasons why international protection is sought.<sup>127</sup> In addition, in an official note which is sent to the competent organisational unit of the Ministry of Interior, the police transmits information on the circumstances of irregular migration as well as personal data referred to in Article 15 LITP which are essential for assessing if there is a need for special reception and procedural guarantees, e.g., for pregnant women, elderly, disabled persons, unaccompanied children.

After having expressed their intention to seek international protection, the applicant is given a registration certificate (*potvrda o registraciji*) which contains the following details: the information of the competent authority issuing the certificate, the place and date of issue, the applicant's registration number, the applicant's name and surname, date, place and country of birth, nationality, gender and place, address and the deadline by which the applicant is required to report to the Reception Centre for Applicants for International Protection or another facility where they will be accommodated. It also includes the name, surname, date of birth, and personal identification number of accompanying persons, the name of the special guardian if the applicant is an unaccompanied child, as well as the signature of the official and the official stamp.<sup>128</sup>

The certificate serves as proof that a third-country national or a stateless person has been registered in the Information System of the Ministry of the Interior as an applicant for international protection in Croatia. The certificate shall be issued by the competent authority that registered the applicant in the Information System.<sup>129</sup>

In addition, amendments to the LITP in 2023 introduced a new obligation for applicants, who have to undergo verification and identification of their identity and the country or region of origin, including language and dialect analysis with the possibility of using software technologies, with full respect for the principles of

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<sup>122</sup> Article 33(8) LITP.

<sup>123</sup> Article 33(9) LITP.

<sup>124</sup> Article 33(10) LITP.

<sup>125</sup> The Reception Centre is also the place where asylum seekers have to report themselves after expressing their intention to lodge an asylum claim and where interviews are conducted.

<sup>126</sup> Article 33 (11) LITP.

<sup>127</sup> Information provided by the Border Directorate, 17 August 2018.

<sup>128</sup> Article 3(2) Ordinance on the forms and data collection in the procedure for international and temporary protection.

<sup>129</sup> Article 3(3)-(4) Ordinance on the forms and data collection in the procedure for international and temporary protection.

human dignity.<sup>130</sup> If it is not possible to determine the identity and country of origin of the applicant, they shall undergo an examination, which may include a search of objects and data carriers such as computers and other electronic and mobile devices that the applicant carries, for the purpose of establishing their identity and country of origin. That examination shall be carried out by a person of the same sex with full respect for the principles of human dignity and physical and psychological integrity. The examination shall be carried out with the written consent of the applicant with full respect for the protection of personal data, and in case of denial of consent, it shall be considered that the applicant is not cooperating with the Ministry of Interior.<sup>131</sup> However, at the moment, no information is available as to when this verification and identification of the identity and the country or region of origin - including language and dialect analysis or possible further examination - is realised (i.e., whether it is realised in the phase of registration or lodging the application or later during the procedure). It then remains to be seen how this will be implemented in practice and how it will reflect on the procedure.

In July 2024, the Directorate for European Affairs, International Relations and European Union Funds of the Ministry of the Interior adopted a Decision on the direct allocation of financial resources for the implementation of the project “*Procurement of Language Recognition Software – LIDA – Language Identification Assistant*” under the AMIF. The purpose of the project is to procure software and computer equipment for language recognition, which will ensure the digitalisation of business processes and assist state officials of the Department for International Protection Procedure in assessing the credibility of applicants' statements in relation to their country of origin, thereby improving the international protection system. According to unofficial information, preparatory activities are currently underway and project implementation has not yet begun.<sup>132</sup>

### 3.2. Lodging the application

After reporting to the Reception Centre for Applicants for International Protection, an applicant shall be enabled to formally lodge an application as soon as possible and no later than 15 days from the registration of their status in the records of the Ministry of Interior.<sup>133</sup> The authority conducting registration indicates in the registration certificate the time and place where the applicant has to report. In certain cases, involving vulnerable persons or for other humanitarian reasons, applicants will be accompanied by police officers to the Reception Centre for applicants for international protection.<sup>134</sup>

If, after having expressed the intention to apply for international protection, a foreigner does not report to the Reception Centre for Applicants for International Protection without a justified reason, the Ministry of Interior will *ex officio* discontinue the procedure;<sup>135</sup> according to LITP it shall be deemed that the applicant has withdrawn the application if they do not appear at the Reception Centre or avoids lodging an application and fails to justify this within two days of the time limit set for appearing at the Reception Centre, or for lodging an application.<sup>136</sup>

The procedure for international protection is initiated by lodging the application. The application for international protection must be submitted directly to the Reception Centre for Applicants for International Protection orally on record, and exceptionally in writing. The applicant will be allowed to lodge an application at the Reception Centre for Applicants for International Protection as soon as possible, and no later than within 15 days from the registration of their status in the records of the Ministry of the Interior. Exceptionally,

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<sup>130</sup> Article 52(3) (3) LITP.

<sup>131</sup> Article 52(6) (8) LITP.

<sup>132</sup> Ministry of the Interior, Directorate for European Affairs, International Relations and European Union Funds: Decision on the direct allocation of financial resources for the implementation of the project “Procurement of Language Recognition Software – LIDA – Language Identification Assistant”, available at: <https://eufondovi.mup.hr/UserDocsImages/dokumenti/Odluka%20o%20dodjeli%20financijskih%20sredstava/Odluka%20o%20dodjeli%20-%20LIDa.pdf?vel=1608263>.

<sup>133</sup> Article 34(2) LITP.

<sup>134</sup> Information provided by the Ministry of Interior, 10 August 2018.

<sup>135</sup> Information provided by the Ministry of Interior, 13 February 2018.

<sup>136</sup> Article 39(2)(1) LITP.

the applicant may be allowed to lodge the application outside the Reception Centre within an appropriate timeframe, depending on their personal circumstances.<sup>137</sup>

In 2024, out of 26,776 expressed intentions for international protection, only 1,307 applications for international protection were lodged.<sup>138</sup>

The Reception Centre for Applicants for International Protection is the competent authority for conducting interviews for the purpose of receiving applications for international protection. The application is usually lodged at the Reception Centre for Applicants for International Protection, and only exceptionally outside the Reception Centre within an appropriate period, depending on personal circumstances of the applicant, for example where they are detained in the Reception Centre for Foreigners (pre-removal detention centre), the Transit Reception Centre for Foreigners or in prison. In practice this means that usually the application is submitted orally by the person seeking protection in front of the state officials of the Reception Centre for Applicants for International Protection. Officials will draft minutes of the interview. The civil servants of the Reception Centre conduct a short interview to collect the following information: personal data of the applicant, information on military service, family and other relations, information on the journey from country of origin (type of transportation and route) and the reasons (in short) why they fled their country of origin. Amendments of the LITP from 2023 introduced a possibility of logging the application in writing. According to the explanation during the public consultations on the Amendments to the LITP, this exception will apply to applicants for international protection with certain health problems (e.g., deaf and hearing impaired or mute person).<sup>139</sup>

All documents, including the minutes of the first interview or application in writing, are then sent to the Department for international protection procedure within the Ministry of Interior, which is responsible for conducting a further substantive interview and examining the application.

Civil servants in the Reception Centre for Applicants for International Protection provide applicants with information on the procedures, their rights and obligations, and issue the applicants' identity cards.

After the application has been lodged, the applicant receives an international protection applicant card (*iskaznica tražitelja*). The card shall be issued within three days from the lodging of the application and confirms the right of residence in the Republic of Croatia until the completion of the procedure. An applicant's card does not constitute proof of identity.<sup>140</sup> The card is not issued if the person applies at the border.<sup>141</sup>

However, Croatia is still a transit country as it is estimated that the majority of applicants for international protection leave the country very soon after expressing their intention to apply for international protection (in 2023 it was reported that 97% of people having expressed their intention to apply for international protection left or were trying to leave Croatia).<sup>142</sup>

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<sup>137</sup> Article 34(1) – (3) LITP.

<sup>138</sup> Croatian Law Centre: The Croatian Asylum System in 2024 - National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).

<sup>139</sup> Public consultation on the Proposal of the Law on amendments to the Law on international and temporary protection, available in Croatian at: <https://bit.ly/3Rwr22E>.

<sup>140</sup> Article 62(1) LITP.

<sup>141</sup> Article 62(2) LITP.

<sup>142</sup> Government of the Republic of Croatia: Report on the situation of illegal migration in the territory of the Republic of Croatia for the period since Croatia's entry into the Schengen area, available at: <https://bit.ly/3z72PcY>, 4.

## C. Procedures

### 1. Regular procedure

#### 1.1. General (scope, time limits)

##### Indicators: Regular Procedure: General

- |   |   |
|---|---|
| 1. Time limit set in law for the determining authority to make a decision on the asylum application at first instance:                    | 6 months  |
| 2. Are detailed reasons for the rejection at first instance of an asylum application shared with the applicant in writing? <sup>143</sup> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Backlog of pending cases at the end of 2024:   | Not available   |
| 4. Average length of the first instance procedure in 2024:  | Not available   |

The procedure for granting international protection in Croatia is an administrative procedure regulated by the Law on International and Temporary Protection (LITP). Additionally, the Law on General Administrative Procedure is applied in the procedure, unless otherwise provided by the LITP. Articles 38-40 of LITP regulate the regular procedure.

The first instance decision can be a decision by which the Ministry of Interior:

- ❖ Grants refugee status (asylum);
- ❖ Grants subsidiary protection;
- ❖ Rejects the application if the applicant does not meet the conditions for asylum/refugee status and subsidiary protection;
- ❖ Rejects the application if the conditions are met for exclusion;
- ❖ Rejects the application as manifestly unfounded if reasons for the accelerated procedure have been met;
- ❖ Dismisses a subsequent application as inadmissible; or
- ❖ Discontinues the procedure.

The Ministry of Interior's Department for international protection procedures has the obligation to take a decision on the application for international protection within six months from its lodging. If no decision can be issued within six months, the applicant shall be informed of it in writing and, at their request, shall be provided with information about the reasons for the failure to respect the time limit and about the time needed before which they may expect a decision. The six-month time limit may be exceptionally prolonged for additional nine months and another three months. It may be extended for a further nine months if:

- (a) The application includes complex facts and/or legal issues;
- (b) A large number of third-country nationals or stateless persons are requesting international protection at the same time; or
- (c) The applicant, through their actions, contrary to their obligations as applicant, causes the time limit to be extended.

However, this time limit may be extended for a further three months exclusively in order to ensure the complete consideration of the application.<sup>144</sup>

The Ministry of Interior does not keep records on the duration of the first instance procedure.<sup>145</sup>

If it is reasonable to expect that no decision will be issued within these time limits on account of a temporary unsafe situation in the country of origin, the Ministry shall check the situation in the country of origin at least

<sup>143</sup> Except for exclusion cases.

<sup>144</sup> Article 40 LITP.

<sup>145</sup> Information provided by the Ministry of Interior, 8 March 2024.

every six months and inform the applicant and the European Commission within a reasonable time of the reasons for failure to issue a decision. In that case, a decision must be issued no later than within 21 months from the day the application is lodged.<sup>146</sup>

## 1.2. Prioritised examination and fast-track processing

Applications by unaccompanied children are prioritised as specified by the LITP.<sup>147</sup> Additionally, applications which may be approved on the basis of the established facts (meaning that international protection will be granted) also have priority in decision-making.<sup>148</sup>

According to the Ministry of Interior, priority in the decision-making process is given to applications of unaccompanied children. In addition, a prioritised examination is conducted in the cases of vulnerable groups, accelerated procedure, subsequent applications and for applicants with restricted freedom of movement.<sup>149</sup>

## 1.3. Personal interview

### Indicators: Regular Procedure: Personal Interview

1. Is a personal interview of the asylum applicant in most cases conducted in practice in the regular procedure? ☒ Yes ☐ No  
 ❖ If so, are interpreters available in practice, for interviews? ☒ Yes ☐ No
2. In the regular procedure, is the interview conducted by the authority responsible for taking the decision? ☒ Yes ☐ No
3. Are interviews conducted through video conferencing? ☐ Frequently ☒ Rarely ☐ Never
4. Can the asylum applicant request the interviewer and the interpreter to be of a specific gender? ☒ Yes ☐ No  
 ❖ If so, is this applied in practice, for interviews? No information

After a short initial interview conducted by the officials from the Reception Centre for Applicants for International Protection for the purpose of lodging an application, a substantive interview is conducted by the Department for international protection procedure of the Ministry of Interior. According to the LITP, when the application has been lodged, the Ministry of Interior shall, as soon as possible, interview the applicant. During the interview, the applicant is obliged to present all circumstances relevant to the application for international protection, truthfully answer all questions, and submit all available evidence to support the application and give credible and convincing explanations of all the reasons behind the application for international protection.<sup>150</sup>

Separate interviews are conducted for adult men and women from the same family. Accompanied children are covered by the application of one of the parents, i.e., legal representative,<sup>151</sup> so interviews are not held with children. Exceptionally, a child older than 16 years of age who is married may take part independently in the procedure for granting international protection.<sup>152</sup>

Officials of the Department for the international protection procedure are trained on interviewing techniques and interviewing vulnerable persons. An unaccompanied child shall attend the interview in person in the presence of the special guardian<sup>153</sup> (see [Legal representation of unaccompanied children](#)). The procedure

<sup>146</sup> Article 40 LITP.

<sup>147</sup> Article 17(9) LITP.

<sup>148</sup> Article 38(2) LITP.

<sup>149</sup> Information provided by the Ministry of Interior, 8 March 2024.

<sup>150</sup> Article 35(2) LITP.

<sup>151</sup> Article 16(2) LITP.

<sup>152</sup> Article 16(3) LITP.

<sup>153</sup> Article 17(8) LITP.

upon the application of an unaccompanied child shall be conducted by an official of the Ministry of the Interior trained to work with children.<sup>154</sup>

If possible, applicants shall be provided ex officio with a translator/interpreter of the same sex in order to ensure a full explanation of the reasons for the application or for other justified reasons.<sup>155</sup> However, there is no information to what extent is this implemented in practice. The interpreter must be reliable, impartial and must translate truthfully and accurately during the procedure.<sup>156</sup>

The interview may be omitted:

- ❖ When a positive decision on application may be taken on the basis of the available evidence;
- ❖ In cases when an applicant is unfit or unable to be interviewed, owing to enduring circumstances beyond their control; or
- ❖ When the admissibility of a subsequent application is being assessed.<sup>157</sup>

The Ministry of Interior does not keep records of conducted interviews, however they reported that in 2023, for 12 applicants for international protection whose applications for international protection were rejected in accordance with Article 39, paragraph 4. of the LITP, the decisions were made without conducting an interview.<sup>158</sup> Article 39 regulates the suspension of procedure for international protection. However, paragraph 4 of Article 39 specifies that exceptionally the Ministry of Interior may, in the case referred to in paragraph 2, points 2 and 3 of Article 39 (i.e., when it is deemed that the applicant has withdrawn the application if the applicant does not respond to the summons to an interview, and does not justify such absence within 2 days of the scheduled interview (point 2) or leaves the place of residence for longer than 2 days without the consent of the Reception Center for Applicants of International Protection (point 3)), reject the applicant's application if, on the basis of the established facts and circumstances, it assesses that the conditions for granting international protection have not been met. No information is available for 2024.

The LITP provides that the applicant shall give reasons if they refuse to cooperate with the official conducting the interview. The Ministry of Interior shall consider the reasons and shall inform the applicant orally for the record of its decision.<sup>159</sup>

All interviews are conducted by the caseworkers of the Department for international protection procedure within the Ministry of Interior, who are also responsible for taking decisions on the application. However, in practice it can happen that the official who takes the decision is not the same as the one who conducted the interview.

The interview can also be held using audio-visual electronic devices. A record of the interview must be drawn up in accordance with the Law on general administrative procedure. The interview and oral statements given on the record may be recorded, of which the applicant is informed in advance. Recordings or transcripts of recorded interviews and oral statements constitute, together with the record of the interview, an integral part of the applicant's file.<sup>160</sup>

In 2023, one interview was held via video conference. Ministry of Interior reported that the lack of interpreters for certain language is a constant challenge that mostly depends on the changes in the demographic structure of the applicants for international protection.<sup>161</sup> No information is available for 2024.

However, the organization Are You Syrious (AYS)<sup>162</sup> reported challenges related to the interviews (i.e., they have received information on several occasions that applicants for international protection were notified of the date of the interview only the day before or even on the morning of the interview). Moreover, one

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<sup>154</sup> Article 17(6) LITP.

<sup>155</sup> Article 14(3) LITP.

<sup>156</sup> Article 13(2) LITP.

<sup>157</sup> Article 35(8) LITP.

<sup>158</sup> Information provided by the Ministry of Interior, 8 March 2024.

<sup>159</sup> Article 35(6) LITP.

<sup>160</sup> Article 35 (10)- (13) LITP.

<sup>161</sup> Information provided by the Ministry of Interior, 8 March 2024.

<sup>162</sup> Information provided by the Ministry of Interior, 15 January 2025.

applicant complained to AYS that they had been waiting for an interview for over 11 months, and another for over 9 months.

### 1.3.1. Interpretation

Most applicants are interviewed in practice. According to the LITP, the presence of an interpreter during the personal interview is required in case an applicant does not understand the language in which the procedure is conducted. An interpreter shall be provided for the language that the applicant may reasonably be presumed to understand and in which the applicant is able to communicate.<sup>163</sup> In practice this means that the interpreter is present in all cases, except for cases in which the applicant understands Croatian (for example, in the past, when applicants were nationals of a neighbouring country such as Bosnia and Herzegovina).

According to the knowledge of the Croatian Law Centre, there is no specific code of conduct for interpreters in the context of the procedure for international protection, nor were standards prescribed in the past with regard to the qualifications of interpreters in the procedure for international protection. The LITP prescribes conditions that have to be fulfilled in order for a contract to be signed between the Ministry of Interior and an interpreter.<sup>164</sup> The Ministry shall conclude an agreement with a translator/interpreter if:

- (a) It is assessed that they have good knowledge of the Croatian language in writing and speech;
- (b) It is assessed that they have good knowledge of the language for which they are being engaged;
- (c) It is established that no circumstances exist that could represent a hindrance to employment in the civil service pursuant to the regulations on employment in the civil service;
- (d) It is established that no security hindrances exist after the conducting of a basic security check pursuant to the regulations on security checks.

In addition, the interpreter must be reliable, impartial and must interpret truthfully and accurately. They are obliged to act pursuant to the regulations governing the protection of personal data, and especially may not disclose the data such as personal and other information collected during the procedure.

If for objective reasons it is not possible to provide an interpreter for a specific language, the Ministry of Interior shall request assistance from another Member State of the European Economic Area.

Interpreters are not professionally trained, and interpretation is not done by accredited interpreters in the majority of cases. Many of them are native speakers, however some of them are not fluent in the Croatian language. Usually, persons who simply possess the requested language skills are contracted by the Ministry of Interior. Nevertheless, there is a lack of interpreters, especially for some specific languages.

In 2023, it was observed that challenges occurred regarding translation in the procedure for international protection for applicants from Burundi as their interviews were conducted in the presence of an interpreter for the French language, instead of an interpreter for their mother tongue – Kirundi or Swahili. In 2024, a similar challenge occurred with regard to a Somali interpreter.

Within the AMIF fund, in July 2020, the Directorate for European Affairs, International Relations and European Union Funds adopted a Decision on the allocation of funds for the implementation of the project "Interpretation and expansion of the network of interpreters in the procedure for granting international protection".<sup>165</sup>

According to the Ministry of Interior,<sup>166</sup> the lack of interpreters for certain languages is a constant challenge that mostly depends on the variable demographic structure of the applicants. Therefore, within the framework of the project "Interpretation and Expanding the network of interpreters in the procedure for

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<sup>163</sup> Article 14(2) LITP.

<sup>164</sup> Article 13 LITP.

<sup>165</sup> Ministry of Interior; Decision on the allocation of funds for the implementation of the project "Interpretation and expansion of the network of interpreters in the procedure for granting international protection", available in Croatian at: <https://bit.ly/3VN3LMk>.

<sup>166</sup> Information provided by the Ministry of Interior, 8 March 2024.



granting international protection”, necessary activities are conducted to ensure the continuous availability of interpreters for the requested languages.

The LITP prescribes that interpretation can be provided by means of electronic telecommunications or audio-visual equipment.<sup>167</sup> In 2023, one interview was conducted via video conference.<sup>168</sup> No information is available for 2024.

### 1.3.2. Recording and transcript

During the interview, *verbatim* minutes of the interview are drafted. Once the interview is finished, the interpreter translates the minutes to the applicant who then has the opportunity to make corrections, interventions, as well as to add information if needed. Generally, in practice, the quality of the minutes is not considered problematic, although there were cases in the past in which minutes were not considered to be of sufficient quality by the applicants. It also depends on the interpreter, mainly whether they summarise the answers (which they should not do), or translate each sentence of the applicant (which is how they should translate). By signing the minutes, the applicant agrees with the content of the transcript.

However, in the Ombudsperson report for 2023, it was reported that CSOs and attorneys at law pointed out that not all statements made by the applicant are recorded in the minutes compiled during the procedure, but the content of the statement is often summarised, so it can happen that important details are lost which may result in an improperly established factual situation, *i.e.*, an improper assessment that the applicant statement is incoherent, inconsistent or incorrect.<sup>169</sup>

## 1.4. Appeal

### Indicators: Regular Procedure: Appeal

1. Does the law provide for an appeal against the first instance decision in the regular procedure?

❖ If yes, is it	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
❖ If yes, is it suspensive	<input checked="" type="checkbox"/> Judicial	<input type="checkbox"/> Administrative
	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Some grounds <input type="checkbox"/> No
2. Average processing time for the appeal body to make a decision: 129 days<sup>170</sup>

### 1.4.1. Appeal before the Administrative Court

Decisions of the Ministry of Interior may be challenged before the Administrative Court.<sup>171</sup> According to the law, the time limit for an applicant to lodge the lawsuit to the Administrative Court in the regular procedure is 30 days after the delivery of the decision of the Ministry of Interior.<sup>172</sup>

The Directorate for European Affairs, International Relations and EU Funds and the Ministry of the Interior of the Republic of Croatia (*i.e.*, Directorate for Immigration, Citizenship and Administrative Affairs) signed, in March 2024, an Agreement on the Direct Allocation of Financial Resources for the implementation of the project “Free Legal Aid in the International Protection Procedure” under the AMIF Fund. The total value of the project amounts to EUR 400,000.00 including VAT, with 75% being co-financed by AMIF funds. The purpose of the project is to ensure free access to legal remedies and the protection of the rights of applicants for international protection.<sup>173</sup>

<sup>167</sup> Article 13 (7) LITP.

<sup>168</sup> Information provided by the Ministry of Interior, 8 March 2024.

<sup>169</sup> Ombudswoman: Report of the Ombudswoman for 2023, available in Croatian at: <https://bit.ly/4crt2kR>.

<sup>170</sup> This refers only to the average processing time at the Administrative Court of Zagreb in 2024. Waiting times may vary at other Courts. Nevertheless, in 2024, 174 out of the 179 lawsuits were dealt by the Administrative Court of Zagreb.

<sup>171</sup> Article 32(2) LITP.

<sup>172</sup> Article 40 (1) Law on Administrative Disputes.

<sup>173</sup> Ministry of the Interior: Decision on the Direct Allocation of Financial Resources for the Implementation of the Project “Free Legal Aid in the International Protection Procedure”, available at: <https://eufondovi.mup.hr/vijesti/odluka-o-izravnoj-dodjeli-financijskih-sredstava-za-provedbu-projekta-besplatna-pravna-pomoc-u-postupku-odobrenja-medjunarodne-zastite/666>.

In June 2024, the Ministry of the Interior published a new Public Call for applications for candidates to add to the list of legal aid providers in the procedure of granting international protection before the 4 administrative courts in Croatia.<sup>174</sup> In accordance with the LITP and the Ordinance on Free Legal Aid in the International Protection Procedure, a legal aid provider may be either an attorney or a legal professional from an association registered for the provision of legal aid with the ministry responsible for justice affairs. The new list of selected legal aid providers is available [here](#).

In the Croatian Law Centre's experience, there is no information specifying that applicants face obstacles in challenging a decision in practice, although some issues arise with regard to legal assistance (see [Legal assistance](#)).

Each asylum case is examined by a single judge. Judges are not specialised on asylum matters, although from time to time some trainings are organised for judges. As documented in [previous updates](#) of this AIDA country report, several trainings have been organised by the Croatian Law Centre with the financial support of UNHCR since 2016.

In 2024, a training of Administrative court judges, financially supported by UNHCR, was held. The topic of the training was restriction of freedom of movement of applicants for international protection. 13 judges attended the seminar, which was held in the premises of the Judicial Academy.

In 2023, the launch of the Croatian version of the HELP (Human Rights Education for Legal Professionals) / UNHCR Course on Asylum and Human Rights took place. In May 2024, the Council of Europe HELP Programme, in partnership with the Croatian Justice Academy, launched the HELP course focusing on the protection of refugee and migrant children. The launch event was held in Zagreb, Croatia, and was attended by judges from across the country. The activity was organised under the EU-CoE HELP "*Judicial Training on Rule of Law and Fundamental Rights*" project, funded by the European Union's Justice Programme.<sup>175</sup> At the event, UNHCR presented the protection situation of refugee and asylum-seeking children in Croatia. UNHCR highlighted the key challenge of providing appropriate family or community-based care arrangements, and underscored the importance of child-friendly procedures, alternatives to detention and family reunification.<sup>176</sup>

The court holds a hearing in the presence of the applicant in the majority of cases. Exceptions may occur when the applicant's whereabouts are unknown. Interpreters are provided and paid by the State and available during the administrative dispute. The hearings are not public.

However, some challenges were observed in practice. One attorney at law stated that there are cases in which applicants for international protection are not invited to a hearing. This can happen in cases of subsequent applications but it also sometimes depends on the individual judge's approach in a given case. The same attorney mentioned several cases where applicants were not invited to the hearing even though, at the time, they were accommodated at the Reception Centre for Applicants for International Protection. In these cases, the court rejected the motion to hear the applicant, explaining that it was not obliged to do so and that the applicant had already been interviewed during the administrative procedure, therefore considering a court hearing unnecessary. In one case, the court made the applicant's hearing conditional on the advance payment of interpretation costs. The payment was made, and the applicant was eventually heard.<sup>177</sup>

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<sup>174</sup> Ministry of the Interior: Public Call for applications to the list of legal aid providers in the international protection procedure, available at: <https://mup.gov.hr/UserDocsImages/Javna%20nabava/Javni%20pozivi/Javni%20poziv%20-%202024.pdf>

<sup>175</sup> Council of Europe: HELP course on Refugee and Migrant Children launched for Croatian judges, 24 May 2024. available at: <https://www.coe.int/en/web/help/-/help-course-on-refugee-and-migrant-children-launched-for-croatian-judges>.

<sup>176</sup> Information provided by the UNHCR Office for Croatia, 18 March 2025.

<sup>177</sup> Information provided by attorney at law, 31 January 2025.

In 2021, the Law on Administrative Disputes was amended introducing *inter alia* the possibility for the court to carry out the hearing remotely through the use of appropriate audio-visual devices.<sup>178</sup>

In March 2024, a new Law on Administrative Disputes was adopted, which entered into force on 1 July 2024.<sup>179</sup>

The court freely assesses the evidence and determines the facts. The court takes into account the facts established in the procedure leading to the contested decision, without being bound by the facts established in the procedure of the Ministry of Interior, as well as the facts it establishes independently. The parties may propose which facts should be established and the evidence by which they may be proven, but the court is not bound by these proposals. Evidence in terms of the Law on Administrative Disputes includes documents, witness testimony, experts' opinions and findings, on-site investigations, the hearing of parties, and other means of proof.<sup>180</sup> In general, there is no time limit set in law for the Administrative Court to make a decision in the regular procedure. However, the judgment shall be announced within a period not exceeding 30 days from the date the hearing is concluded.<sup>181</sup> The judgment shall be delivered to all parties to the dispute in written or electronic form and dispatched within 15 days from the date of its announcement, or, if not announced, from the date it was rendered.<sup>182</sup>

The outcomes of the administrative dispute can be that the lawsuit is dismissed as inadmissible (and therefore not decided on the merits), rejected (i.e., decided negatively on the merits), or allowed. If the lawsuit is allowed, the Court can either refer the case back to the Ministry of Interior for the review procedure or it can change the decision by itself, meaning that the result is granting refugee or subsidiary protection status. The court decisions are not publicly available.

Administrative Courts reported the following decisions in 2024:

Second instance decisions by Administrative Courts: 2024					
Category	Zagreb	Rijeka	Osijek	Split	Total
Reforming judgment	5	0	0	0	5
Accepted - cases referred back to the Ministry of Interior	15	0	0	0	15
Rejected	143	2	0	0	145
Discontinued	5	0	0	0	5
Case referred to other Administrative court due to incompetence	6	1	0	0	7
Pending	0	0	0	2	2
<b>Total</b>	<b>174</b>	<b>3</b>	<b>0</b>	<b>2</b>	<b>179</b>

Source: Administrative Court of Zagreb, 17 January 2025; Administrative Court of Rijeka, 31 January 2025; Administrative Court of Osijek, 27 January 2025; Administrative Court of Split, 31 January 2025.

As indicated above, almost all lawsuits were dealt with by the Administrative Court of **Zagreb** and more than half of them were rejected in 2024. The Administrative Court of **Zagreb** reported that from 174 cases, in one case subsidiary protection and in two cases asylum (refugee status) was granted.

<sup>178</sup> Article 37 paragraph 2 of the Law on Administrative Disputes prescribes that the hearing is, as a rule, held in the court building. The court can determine that the hearing be held at a distance. No appeal is allowed against this decision.

<sup>179</sup> Law on Administrative Disputes, Official Gazette 36/2024, available at: [https://narodne-novine.nn.hr/clanci/sluzbeni/2024\\_03\\_36\\_564.html](https://narodne-novine.nn.hr/clanci/sluzbeni/2024_03_36_564.html).

<sup>180</sup> Article 49 Law on Administrative Disputes.

<sup>181</sup> Article 121 (1) Law on Administrative Disputes.

<sup>182</sup> Article 122 Law on Administrative Disputes.

The average processing time for administrative disputes in the procedure for granting international protection before the Administrative Court in Zagreb was 129 days in 2024 (and 120 days in 2023).

#### 1.4.2. Onward appeal before the High Administrative Court

Applicants may lodge a further appeal against the Administrative Court decision before a High Administrative Court. According to the Law on Administrative Disputes, the High Administrative Court shall reject the appeal as unfounded and uphold the first-instance judgment (i.e., the judgment of the Administrative Court) when it determines that there are no reasons for the judgment to be challenged or that the reasons do not affect the adoption of a different decision. In addition, the High Administrative Court shall annul the first-instance judgment and shall solely remedy the deficiencies and resolve the matter by issuing a judgment if it determines that the administrative court has committed a substantial violation of the rules of court procedure, has erroneously or incompletely determined the factual state or has inaccurately applied the substantive law.<sup>183</sup> This means that the High Administrative Court can decide on the merits and can grant international protection.

This appeal, however, does *not* have suspensive effect.<sup>184</sup> During 2024, the High Administrative Court received 17 appeals in international protection cases:

Onward appeal statistics: 2024	
Category	Number
Appeals received	17
Appeals rejected	16
Accepted	1
<b>Total decisions</b>	<b>34</b>

Source: High Administrative Court, 22 January 2025.

As indicated above, the large majority of appeals were also rejected by the High Administrative Court.

#### 1.5. Legal assistance

##### Indicators: Regular Procedure: Legal Assistance

- Do asylum applicants have access to free legal assistance at first instance in practice?
  - ☒ Yes ☒ With difficulty ☐ No
  - ❖ Does free legal assistance cover:
    - ☐ Representation in interview
    - ☒ Legal advice
- Do asylum applicants have access to free legal assistance on appeal against a negative decision in practice?
  - ☒ Yes ☐ With difficulty ☐ No
  - ❖ Does free legal assistance cover
    - ☒ Representation in courts
    - ☒ Legal advice

The right to free legal assistance in procedures is regulated by LITP and by the Ordinance on free legal aid in the procedure of granting international protection. There is also a general procedure and system of free legal aid which is regulated by the Law on Free Legal Aid, but applicants for international protection can only benefit from this law in some procedures for which legal aid is not provided for by the specific law (for example LITP).

Lawyers or legal advisors intervening in international protection cases are not obliged to follow any specific training.

<sup>183</sup> Article 74 (1) (2) Law on Administrative Disputes.

<sup>184</sup> Article 51(3) LITP.

In order to be able to provide legal assistance, the non-governmental organisation must be registered in the Register of Primary Legal Aid Providers. Together with the application for registration in the Register, a proof of assured cooperation with a person who has completed graduate studies in law, passed the state professional or bar exam and has at least two years of work experience in the profession, or a scientific title and a proof of payment of liability insurance for damages caused to a client by providing primary legal assistance in the amount of 50% of the insurance prescribed by the Law on Attorneys, must be attached.<sup>185</sup>

### 1.5.1. Legal assistance at first instance

The LITP provides for the possibility of legal information and counselling at first instance procedure before the Ministry of Interior.<sup>186</sup> The LITP specifies that applicants should, at their request, be provided with legal and procedural information on the approval of international protection, taking into account the circumstances of the specific case, in a language which it may be reasonably be presumed that they understand and in which they are able to communicate. The right to counselling should be provided by organisations working to protect the rights of refugees or by attorneys with whom the Ministry shall conclude an agreement on the provision of legal counselling. An applicant who has no financial resources or items of significant value that enable them to have an appropriate standard of living shall have the right to legal counselling. According to the Ordinance on free legal aid in the procedure of granting international protection, 'items of significant value' refer to the applicant's belongings and to those of members of their household, which includes their real estate and movable property.<sup>187</sup>

A public call under the AMIF fund for legal aid providers was published by the Ministry of Interior in September 2021.<sup>188</sup> The Croatian Law Centre (CLC) was selected in 2022 as organisation responsible for providing legal counselling at first instance until the end of 2022. The legal counselling activities entailed provision of: general legal information related to the procedure for granting international protection, legal information on the right to work and the right to free legal aid to applicants for international protection, legal and procedural information on the granting of international protection related to the specific application for international protection, information on stage of submitted application for international protection, the explanation of reasons why the application for international protection was rejected and the possibility of using a legal remedy. Under the project informative materials and brochures on the ways and conditions of exercising the right to legal counselling were prepared, and a mobile application on the main features of the procedure for granting international protection in the Republic of Croatia and the ways of exercising the rights of applicants for international protection in practice was developed.<sup>189</sup>

No new public call was published in 2024, but it was published in February 2025.<sup>190</sup>

During 2023 and 2024, legal assistance at this stage was not provided by the State, so applicants for international protection sought legal advice from organizations that offered legal counselling as part of their activities (for example, to the Croatian Law Centre, the Centre for Peace Studies, the Border's None and JRS).

As in previous years, in 2024, CLC implemented the project "Legal Assistance and Capacity Building for Access to Territory and Asylum in Croatia" with the role of implementing partner and with the financial support of the UNHCR. The provision of legal information to targeted groups of beneficiaries including to applicants for international protection, was usually provided by telephone, mobile applications (WhatsApp) and e-mail or in CLC's office.

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<sup>185</sup> Article 34(3) Law on Free Legal Aid.

<sup>186</sup> Article 59(4)-(6) LITP.

<sup>187</sup> Article 3 (5) Ordinance on free legal aid in the procedure of granting international protection.

<sup>188</sup> Public call in Croatian available at: <https://bit.ly/3pBuqeK>.

<sup>189</sup> <https://play.google.com/store/apps/details?id=hr.mup.rhprotection>

<sup>190</sup> Ministry of Interior: *Public call for financing a project in the field of providing legal advice in the procedure for granting international protection*, 14 February 2025, available at: <https://eufondovi.mup.hr/vijesti/javni-natjecaj-za-financiranje-projekta-u-podrucju-pruzanja-pravnog-savjetovanja-u-postupku-odobrenja-medjunarodne-zastite-723/723>.

Centre for Peace Studies (CPS)<sup>191</sup> also provided legal support to applicants for international protection by telephone, mobile and e-mail or in CPS 's office. Free legal aid was also provided by Jesuit Refugee Service (JRS)<sup>192</sup> and Borders:none.<sup>193</sup>

### 1.5.2. Legal assistance in appeals

According to the LITP, free legal aid includes assistance in the preparation of a lawsuit to the Administrative Court and representation before the Administrative Court, i.e., in the first instance administrative court disputes,<sup>194</sup> if requested by the applicant and foreigner under Dublin transfer, under the condition that they do not have sufficient financial resources or possessions of significant value.<sup>195</sup> Legal assistance may be provided by attorneys at law and lawyers from organisations registered for providing legal assistance.<sup>196</sup>

In practice there are no obstacles to accessing attorneys, as applicants are informed about their right to free legal assistance. In practice when a decision is delivered to applicants, they are also given the list of providers of free legal aid from which they can choose an attorney or lawyer from NGOs, who are then notified by the competent employee of the Ministry of Interior. Further communication takes place between the attorney and the applicant. The procedure is the same for applicants accommodated in the reception centers for applicants for international procedure and in the reception centers for foreigners.<sup>197</sup>

Attorneys and lawyers from NGOs organise the interpreter (among those who have contract with the Ministry of Interior) for the appointment and then inform the Ministry of Interior.

In 2024, two attorneys noted concerns regarding the lack of transparency in the selection of free legal aid providers from the available list of providers.<sup>198</sup>

The Administrative Court shall decide on the right to free legal assistance, and the amount of costs of legal assistance.<sup>199</sup> According to the Ordinance on free legal aid, the Administrative Court decides on the right to free legal assistance and takes into account the evidence on the financial status of the applicant, which is obtained *ex officio* by the Ministry of Interior during the first instance procedure on the one hand and by compiling the form by the applicant on the other hand. In practice that means that at the beginning of the first instance procedure, the applicant has to specify, by completing a form provided to them, if they carry any valuables with them, which is rarely the case.

In previous years, it was emphasised that this system of granting the right to legal aid at the end of the procedure is unfair as the full burden and risk is shifted to the provider of free legal aid. If, for any reason, the court does not endorse free legal aid, the provider will not receive anything and has completed the work without payment.

In 2024, challenges once again emerged regarding the approval and payment of free legal aid in administrative disputes initiated against decisions of the Ministry of the Interior, as highlighted by two attorneys at law.<sup>200</sup> In practice, the outcome depends on the individual judge's interpretation in each case. As a result, it remains uncertain until the conclusion of the administrative dispute whether free legal aid will be approved, and consequently, whether the legal aid provider will be compensated for their work.

This legal uncertainty stems from the fact that many applicants for international protection engage in employment at some stage during the procedure for granting international protection. This raises questions

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<sup>191</sup> Information provided by Centre for Peace Studies, 27 February 2025.

<sup>192</sup> Information provided by Jesuit Refugee Service, 15 January 2025.

<sup>193</sup> Information provided by Borders:none, 12 March 2025.

<sup>194</sup> Article 60(2) LITP.

<sup>195</sup> Article 60(1) LITP.

<sup>196</sup> Article 60(4) LITP.

<sup>197</sup> Information provided by the Ministry of Interior, 8 March 2024.

<sup>198</sup> Information provided by attorneys at law, 10 and 21 January 2025.

<sup>199</sup> Article 60(3) LITP.

<sup>200</sup> Information provided by attorneys at law, 21 and 31 January 2025.



about their eligibility for free legal aid at the time the lawsuit is filed, leading both applicants and providers of free legal aid to hesitate when considering whether to initiate an administrative dispute.

In one such case, in which the Croatian Law Centre (CLC) represented an applicant for international protection, free legal aid was not granted, and the CLC was not reimbursed for its legal services. The Administrative Court reasoned that although the applicant had not received a salary for over six months prior to the conclusion of the administrative dispute, the applicant had received wages during a previous four-month period that exceeded the budgetary threshold as specified by a subregulation. Moreover, the Court emphasized that, since the applicant was accommodated in the Reception Centre for Applicants for International Protection, the applicant had not incurred expenses related to housing, food, or utilities.

The High Administrative Court took the view that free legal aid under the LITP covers only the drafting of the lawsuit and the hearing, and not the preparation of any further submissions which are sometimes needed, which also means that for such legal actions attorneys are not reimbursed.<sup>201</sup> However, as reported by one attorney at law, the practice of judges at the Administrative Court in Zagreb is inconsistent.<sup>202</sup>

In 2024, according to information provided by attorney at law, generally there were no problems with payments for free legal aid. However, the court still only approves the cost of drafting the lawsuit and the presence of an attorney at the hearing. An additional challenge noted in practice during 2024 was that the employment of applicants for international protection is sometimes cited as a reason for the court's refusal to approve free legal aid.<sup>203</sup>

Moreover, the appeal to the High Administrative Court is not covered by free legal aid under the LITP, although it is a logical next step. In addition, the Law on Attorneys requires from attorneys to continue representing clients up to 30 days after the termination of the power of attorney, if there is a risk that a client's rights may be harmed.<sup>204</sup>

The LITP also states that the providers of free legal aid must inform the Ministry of Interior without delay of the bringing of a lawsuit before the Administrative Court and the date of delivery of the Court's judgment. If a provider of legal assistance does not act in line with this obligation, the provider shall be deleted from the List of Providers of Free Legal assistance.<sup>205</sup> The Ordinance on free legal aid prescribes that the provider should be first warned in writing and then deleted for the list if they have not complied with this obligation.<sup>206</sup>

## 2. Dublin

### 2.1. General

According to data from the Ministry of the Interior, Croatia received 24,363 incoming requests under the Dublin Regulation in 2024. Based on these requests, a total of 1,698 individuals were returned to Croatia, with the majority of incoming transfers originating from Germany, Switzerland, Austria, and France. Most of the returned individuals were transported by air, except in cases of returns from neighboring countries such as Slovenia or Hungary, where road transport and police escort were most commonly used.<sup>207</sup>

In 2024, there was an increase in both incoming and outgoing transfers compared to 2023. In 2024, Croatia received a total of 1,698 incoming transfers which were carried out from the following Member States: Austria (249), Belgium (90), Czech Republic (7), Denmark (8), Finland (18), France (215), Greece (1),

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<sup>201</sup> Information provided by an attorney-at-law, 3 January 2018.

<sup>202</sup> Information provided by an attorney-at-law, 16 June 2025.

<sup>203</sup> Information provide by attorneys at law, 21 and 31 January 2025.

<sup>204</sup> Article 10 (2) Law on Attorneys.

<sup>205</sup> Article 60(5) LITP; Article 11(8)-(9) Ordinance on free legal aid in the procedure of granting international protection.

<sup>206</sup> Article 11(8)-(9) Ordinance on free legal aid in the procedure of granting international protection.

<sup>207</sup> Croatian Law Centre: Perspectives and Challenges of the Dublin Procedure at the First Coordination for Asylum, 31 March 2025, available at: <https://www.hpc.hr/en/2025/03/31/perspectives-and-challenges-of-the-dublin-procedure-at-the-first-coordination-for-asylum/>.



Germany (514), Hungary (11), Iceland (1), Italy (1), Liechtenstein (1), Luxembourg (12), Netherlands (106), Norway (42), Poland (2), Slovakia (4), Slovenia (57), Sweden (11), and Switzerland (348).<sup>208</sup>

The primary legal basis for the majority of returns was Article 18(1)(b) of the Dublin Regulation, which stipulates that a Member State must accept an applicant whose application is under review and who has submitted an application in another Member State or is present in the territory of another Member State without a residence permit.

Statistics also indicate that the individuals most frequently returned to Croatia were nationals of Afghanistan, Syria, and Russia.

In addition to incoming requests, Croatia submitted 779 outgoing requests to other Member States in 2024 and carried out 18 outgoing transfers to:<sup>209</sup> Austria (4), Belgium (1), Bulgaria (1), France (5), Italy (1), Germany (3), Netherlands (1), and Spain (2).<sup>210</sup>

In the report for 2024, the Ombudsman for Children stated that when unaccompanied children find themselves in Croatia, they generally request reunification with their parents or closest relatives who are already in another EU Member State. In accordance with the Dublin Regulation, in 2024 Member States sent 166 take charge requests to Croatia, of which 74 were accepted, 69 relating to children. Croatia sent 6 requests to other Member States, of which 5 were accepted, 3 relating to children. The duration of the procedure in these cases depends on the available evidence, such as a marriage or birth certificate or a certificate of kinship, and on the decision to accept by the other country. In the event of an accepted request, the Ministry of Interior states that transfers are carried out as soon as possible. The family reunification procedure in another EU country is often complicated and lengthy, so unaccompanied children often choose an illegal and more dangerous way of travelling.<sup>211</sup>

### Application of the Dublin criteria

Croatia does not use any national legislation to incorporate the Dublin III Regulation, as it is directly applicable, but refers to it in Articles 2 and 43 LITP, specifying that the application will be dismissed if the responsibility of another Member State has been established. In that respect, the LITP does not establish criteria to determine the State responsible, but the Ministry of Interior, when deciding on a case, simply refers to the criteria listed in the Dublin Regulation. The Dublin procedure is applied whenever the criteria listed in the Dublin Regulation are met.

According to the Ministry of Interior,<sup>212</sup> in 2024 Croatia received 24,363 incoming requests in the following categories: 22,722 take back requests, 914 take charge requests, 151 requests for information, 523 requests for the take back reconsideration and 53 requests for reconsideration of take charge requests. In 2024, there were a total of 1,698 incoming transfers.

The most common criterion used for incoming requests was Article 18(1)(b) of the Dublin Regulation, which states that a Member State has to take back an applicant whose application is under examination and who made an application in another Member State or who is on the territory of another Member State without a residence document. Requests were most often accepted on the grounds of Article 20(5) of the Dublin Regulation, which stipulates that an applicant who is present in another Member State without a residence

<sup>208</sup> Ministry of Interior, Statistics 2024, available at:

<https://mup.gov.hr/UserDocsImages/statistika/2025/1/Statistika%20medjunarodna%20zastita%202024.xlsx>.

<sup>209</sup> Croatian Law Centre: Perspectives and Challenges of the Dublin Procedure at the First Coordination for Asylum, 31 March 2025, available at: <https://www.hpc.hr/en/2025/03/31/perspectives-and-challenges-of-the-dublin-procedure-at-the-first-coordination-for-asylum/>.

<sup>210</sup> Ministry of Interior, Statistics 2024, available at:

<https://mup.gov.hr/UserDocsImages/statistika/2025/1/Statistika%20medjunarodna%20zastita%202024.xlsx>.

<sup>211</sup> Ombudswoman for Children: *Report on the work of the Ombudswoman for Children in 2024*, page 200, available at: <https://dijete.hr/hr/download/izvjesce-o-rad-u-pravobraniteljice-za-djecu-za-2024-godinu/>

<sup>212</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).

document or who there lodges an application for international protection after withdrawing their first application made in a different Member State during the process of determining the Member State responsible shall be taken back, under the conditions laid down in Articles 23, 24, 25 and 29, by the Member State in which that application for international protection was first lodged, with a view to completing the process of determining the Member State responsible.

As for outgoing requests, in 2024, Croatia submitted 779 outgoing requests under the Dublin Regulation in the following categories: 682 take back requests, 14 take charge requests, 80 requests for information, 2 requests for the reconsideration of take back request and 1 request for reconsideration of a take charge request. The most common criterion for outgoing requests was Article 18(1)(b) of the Dublin Regulation, which states that a responsible Member State has to take back an applicant whose application is under examination and who made an application in another Member State or who is on the territory of another Member State without a residence document.

## 2.2. Procedure

### Indicators: Dublin: Procedure

1. Is the Dublin procedure applied by the authority responsible for examining asylum applications?  
☒ Yes ☐ No
2. On average, how long does a transfer take after the responsible Member State has accepted responsibility?  
 Not available

Within the Department for international protection procedure, officials working within the Unit for Dublin Procedure conduct Eurodac and Dublin procedures.

Where fingerprinting is temporarily impossible due to medical or other reasons, fingerprints of an applicant shall be taken as soon as those impediments cease to exist.<sup>213</sup>

The applicant who refuses to be fingerprinted without justified cause shall have their fingerprints taken by police officers without their consent.<sup>214</sup> This can also be a reason for the Ministry of Interior to issue a decision in an accelerated procedure (see section on [Accelerated Procedure](#)).<sup>215</sup>

According to information provided by the Ministry of Interior in 2019, applicants are informed about Dublin and Eurodac when they express the intention to apply for international protection and during the interview for the purpose of lodging the application for international protection.<sup>216</sup> Information is available in Arabic, English, Farsi, French, Croatian, Somali, Turkish, and Urdu.<sup>217</sup> No new information is available on this matter since 2019. The Ministry of Interior does not provide a written translation of the Dublin decision, but the decision is explained orally by the interpreter during its delivery in a language that the applicant for international protection understands.

According to information provided by the Ministry of Interior in 2018, in relation to the CJEU ruling in Case C-670/16 Mengesteab,<sup>218</sup> authorities apply the Dublin procedure before the application for international protection is lodged (i.e., from the registration of the intention to apply for international protection)<sup>219</sup> and the three-month deadline for issuing a “take charge” request starts running from the moment they receive the notification of registration of intention to apply for international protection by the police station (see [Registration](#)), not from the moment the application is lodged. The deadline for a “take back” request is two months from the Eurodac “hit”.

<sup>213</sup> Article 33(6) LITP.

<sup>214</sup> Article 33(7) LITP.

<sup>215</sup> Article 41(1)(10) LITP.

<sup>216</sup> Information provided by the Ministry of Interior, 28 January 2019.

<sup>217</sup> Information provided by the Ministry of Interior, 28 January 2019.

<sup>218</sup> CJEU, Judgment of the Court (Grand Chamber) in Case C-670/16, 26 July 2017, available at: <https://bit.ly/4cl8U3y>.

<sup>219</sup> Information provided by the Ministry of Interior, 10 August 2018.

### 2.2.1. Individualised guarantees

During 2023, Belgium requested individual guarantees from Croatia for all approved incoming requests, while Slovenia and Denmark requested individual guarantees for some approved incoming requests. During 2023, Croatia requested individual guarantees from Bulgaria and Greece for outgoing requests.<sup>220</sup> No information on this matter is available for 2024.

### 2.2.2. Transfers

According to the information provided by the Ministry of Interior, the time between submitting an outgoing request and the effective transfer to the responsible Member State in practice will depend on the circumstances of each case, but as a rule it is no longer than 6 months. Requests which are sent based on a Eurodac hit must be sent within 2 months. In the case of “take charge” requests, the deadline for response is 2 months, and if it is a take-back request, the deadline for response is 2 weeks. The transfer is organised within 6 months from the day of the positive response, *i.e.*, acceptance of the request, or final decision on appeal or review in case of suspensive effect.

In the decision on acceptance of responsibility for an individual person, each member State states the conditions of transfer according to which accepted persons should be transferred. Transfers are announced using standardised forms, within the prescribed announcement deadlines. The most frequently used method of transfer from Croatia, as well as to Croatia, is by plane accompanied by police officers. Transfers in Croatia are carried out by land, as a rule, with Slovenia, and in some cases also with Austria, in cases of transfer of families if airline tickets for the same plane are not available.

If it is determined that Croatia is responsible, the Member State that sent the request is obliged to organise the transfer. A transfer is announced for each person and the transfer date is confirmed. The border crossing where the person will arrive and the Service for the Reception and Accommodation of Applicants for International Protection are informed, for prior organisation of adequate reception and accommodation. During 2024, the largest number of persons were transferred from Germany (514), Switzerland (348), Austria (249), France (215), and the Netherlands (106).

All transfers of adults, including voluntary transfers, are accompanied by police officers, as Croatia Airlines requires an escort in all transfer cases to avoid possible inconvenience on the plane. According to experience so far, people agree to transfer to almost all Member States, except to Greece and Bulgaria.

Unaccompanied minors travel accompanied by special guardians, and since these are voluntary transfers, the accompaniment of police officers is not required.

The costs necessary for the transfer are covered by the Member State carrying out the transfer.

During 2024, a significant number of individuals that had returned to Croatia from other Member States suffered from severe mental and physical health conditions, posing a considerable challenge for institutions and organizations operating within the system in Croatia. Officials from the Ministry of the Interior, as well as non-governmental organizations providing support at the Reception Center for Applicants for International Protection, face daily difficulties in ensuring adequate accommodation, medical care, and psychosocial support for those in urgent need. Many individuals were returned to Croatia unexpectedly, often in the middle of the night, without prior notice and without the opportunity to collect their personal belongings or medical documentation. This practice further complicated the provision of timely medical assistance and support, particularly for vulnerable groups such as individuals with chronic illnesses and trauma survivors. Additionally, the forced separation from family members at the time of return further

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<sup>220</sup> Information provided by the Ministry of Interior, 8 March 2024.

worsened their emotional and psychological well-being, deepening feelings of insecurity and distrust in the international protection system.<sup>221</sup>

The transfer to the responsible Member State is organised by the Unit for Dublin procedure of the Ministry of Interior, in cooperation with the receiving Member State.

For examples of relevant case law from different EU countries on appeals against decisions allowing Dublin transfers to Croatia, see [The situation of Dublin returnees](#).

### 2.3. Personal interview

#### Indicators: Dublin: Personal Interview

☒ Same as regular procedure

1. Is a personal interview of the asylum applicant in most cases conducted in practice in the Dublin procedure?  
❖ If so, are interpreters available in practice, for interviews?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
2. Are interviews conducted through video conferencing? ☐ Frequently ☐ Rarely ☒ Never

There is no special interview conducted in the Dublin procedure, since questions relevant to that procedure are part of the interview when expressing the intention to apply for international protection before the police, and also of the first interview that is conducted by the officials of the Reception Centre for Applicants for international protection upon the lodging of the application.

If there are elements in connection with the Dublin procedure which were not mentioned in the application, for instance there is a Eurodac hit and the applicant has not mentioned that they were in another Member State, an additional interview can be conducted.

The same procedural rules as for the regular procedure apply during this part of the procedure, and the same guarantees as for the first interview in the regular procedure will apply (see section on [Regular Procedure: Personal Interview](#)).

### 2.4. Appeal

#### Indicators: Dublin: Appeal

☐ Same as regular procedure

1. Does the law provide for an appeal against the decision in the Dublin procedure?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
❖ If yes, is it	<input checked="" type="checkbox"/> Judicial <input type="checkbox"/> Administrative
❖ If yes, is it suspensive	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

The decision on the transfer includes the grounds for the application of the Dublin Regulation and information on how to lodge a lawsuit against the decision. The lawsuit, for which applicants receive free legal assistance, must be lodged before the Administrative Court within eight days from the delivery of the decision.<sup>222</sup>

The courts and their judges are not specialised in asylum cases. The court examines the lawfulness of the Dublin decision. A personal hearing can be omitted on the decision of the judge: therefore, in some cases the oral procedure is conducted *in absentia* (with only the legal representative present). In Dublin cases, it happens when the complainant disputes only the application of the law and not the facts of the case, and

<sup>221</sup> Croatian Law Centre: Perspectives and Challenges of the Dublin Procedure at the First Coordination for Asylum, 31 March 2025, available at: <https://www.hpc.hr/en/2025/03/31/perspectives-and-challenges-of-the-dublin-procedure-at-the-first-coordination-for-asylum/>.

<sup>222</sup> Article 43(3) LITP.

the parties have not made a request for a hearing to be held. However according to the knowledge of the Croatian Law Centre, in practice hearings are held in Dublin cases as well.

A lawsuit against a decision determining the responsibility of another EEA Member State for examining the application for international protection has suspensive effect. According to the information available to the Croatian Law Centre, in the past courts did not always take into account the level of reception conditions,<sup>223</sup> the procedural guarantees and the recognition rates in the responsible Member State when reviewing Dublin decisions. However no updated information on this is available as of 2024.

There is no publicly available data on how many Dublin decisions on transfers to other Member States were actually challenged before the Administrative Court since Croatia became an EU Member State. Therefore, no conclusions can be drawn on whether the Administrative Court takes into account the conditions and guarantees in the responsible Member state when reviewing the Dublin decision. The Administrative Court in Zagreb reported that information on Dublin cases should not be entered in the “eSpis” application (an application used by courts), so no information is available on Dublin Cases before the Administrative Court in Zagreb in 2021, 2022, 2023 and 2024.<sup>224</sup>

## 2.5. Legal assistance

### Indicators: Dublin: Legal Assistance

☒ Same as regular procedure

1. Do asylum applicants have access to free legal assistance at first instance in practice?  
☐ Yes ☐ With difficulty ☒ No<sup>225</sup>  
❖ Does free legal assistance cover:  
☐ Representation in interview  
☒ Legal advice
2. Do asylum applicants have access to free legal assistance on appeal against a Dublin decision in practice?  
☒ Yes ☐ With difficulty ☐ No  
❖ Does free legal assistance cover:  
☒ Representation in courts  
☒ Legal advice

The same rules as in the [regular procedure](#) apply for access to free legal assistance during the Dublin procedure, meaning that free legal aid includes assistance in the preparation of the lawsuit and representation before the Administrative Court,<sup>226</sup> if requested by the applicant.

## 2.6. Suspension of transfers

### Indicators: Dublin: Suspension of Transfers

1. Are Dublin transfers systematically suspended as a matter of policy or jurisprudence to one or more countries?  
☐ Yes ☒ No  
❖ If yes, to which country or countries?

After accessing the EU, Croatia suspended transfers of applicants for international protection to **Greece**. Where there was no responsible Member State other than Greece, in previous years Croatia took responsibility for the examination of the asylum application. However, from data provided by the Ministry of Interior, it can be inferred that this changed in 2017. The Ministry of Interior reported that, according to the Commission Recommendation of 8 December 2016, the Dublin Unit began sending requests to Greece in cases where, under the conditions of the Dublin Regulation, it was found out that Greece is responsible for examining an application for international protection. According to their information until August 2018, all received answers were negative and no transfer has been carried out since 15 March 2017.<sup>227</sup>

<sup>223</sup> Information provided by the attorney at law, 21 January 2020.

<sup>224</sup> Information provided by the Administrative Court in Zagreb, 31 January 2022.; 23 January 2023., 12 January 2024.

<sup>225</sup> State funded free legal aid for applicants for international protection before the Ministry of Interior ended on 31 March 2020.

<sup>226</sup> Article 60(2) LITP.

<sup>227</sup> Information provided by the Ministry of Interior, 10 August 2018.

In 2023, 31 outgoing requests were sent to Greece, out of which 28 were outgoing take back requests.<sup>228</sup> No information is available for 2024.

More about the suspensions of transfers **to Croatia** can be found above under [The situation of Dublin returnees](#).

## 2.7. The situation of Dublin returnees

The number of applicants for international protection arriving from European Union countries under the Dublin III Regulation to Croatia began to rise again in 2022, with a total of 167 seekers transferred, followed by a significant increase in 2023 (897 incoming transfers). In 2024, Croatia saw a record number of incoming transfers under Dublin III. Official statistical data from the Ministry of the Interior of the Republic of Croatia indicate that 1,698 incoming transfers were recorded in 2024, with the highest numbers of people coming from Germany (514), Switzerland (348), Austria (249), France (215), the Netherlands (106), Belgium (90), Slovenia (57), and Norway (42).<sup>229</sup>

Applicants who are returned from other Member States in principle do not face any obstacles in accessing the procedure for granting international protection in Croatia. However, according to the information from 2016 those who had left Croatia before the end of procedure and therefore had their case suspended, have to re-apply for international procedure (if they wish) once they return to the country, and thereby re-enter their initial procedure, in line with Article 18(2) of the Dublin III Regulation. On the other hand, persons whose application was explicitly withdrawn or rejected before leaving Croatia are considered subsequent applicants upon return, contrary to the requirements of the Regulation.<sup>230</sup>

For persons whose applications would be considered as subsequent applications, the admissibility of the subsequent application must be assessed based on the facts and evidence it contains, and in connection with the facts and evidence already used in the previous procedure. The LITP states that a subsequent application by a foreigner under a transfer shall be considered in the responsible Member State of the European Economic Area, but a subsequent application lodged in the Republic of Croatia shall be dismissed as inadmissible. The subsequent application must be comprehensible and contain the relevant facts and evidence which arose after the decision on their initial application has become final, or which the applicant, for justified reasons, did not present during the previous procedure relating to establishing the fulfilment of the conditions for approval of international protection. The admissibility of the subsequent application shall be assessed on the basis of the facts and evidence it contains, and in connection with the facts and evidence already used in the previous procedure. When it is established that the subsequent application is inadmissible, the Ministry of the Interior shall decide on the subsequent application no later than within 15 days from the day of receiving it. The subsequent application shall be dismissed if it is established that it is inadmissible. When it is established that the subsequent application is admissible, a decision shall be issued once again on the substance of the application, and the previous decision is revoked. The Ministry of the Interior shall then issue a decision in an accelerated procedure no later than within 2 months from the day an admissible subsequent application is lodged.<sup>231</sup>

According to the Centre for Peace Studies (CPS), persons transferred to Croatia under the Dublin Regulation were often not informed about the transfer procedure itself, the possibility of challenging it, or the available legal remedies. At the same time, they were not provided with adequate access to legal remedies against unlawful police conduct during the execution of their transfer to Croatia. Namely, CPS stressed that there have been reports of police violence by law enforcement officers from other countries during transfers, including the case of a woman to whom the CPS provided legal assistance after she was forcibly returned from Switzerland just two days after a spontaneous miscarriage. CPS also reported that

<sup>228</sup> Information provided by the Ministry of Interior, 8 March 2024.

<sup>229</sup> Ministry of Interior, Statistics 2024, available at: <https://mup.gov.hr/UserDocsImages/statistika/2025/1/Statistika%20medjunarodna%20zastita%202024.xlsx>.

<sup>230</sup> ECRE, *Balkan route reversed*, December 2016, p. 30, available at: <https://bit.ly/3mWZAyE>.

<sup>231</sup> EUAA: Information on procedural elements and rights of applicants subject to a Dublin transfer to Croatia, available at: [https://euaa.europa.eu/sites/default/files/2023-05/factsheet\\_dublin\\_transfers\\_hr.pdf](https://euaa.europa.eu/sites/default/files/2023-05/factsheet_dublin_transfers_hr.pdf).



in the first half of 2024, individuals arriving at Zagreb Airport were mostly registered as applicants for international protection and had to organize their own transportation to the Reception Centre for Applicants for International Protection in Zagreb, while vulnerable groups, including families with young children, were transported to the Reception Centre for Applicants for International Protection in Kutina, which is primarily intended for families and vulnerable groups. However, the situation worsened in the second half of the year. Returned individuals began reporting that police officers at the airport merely provided them with the address of a reception centre and immediately instructed them to leave the airport. One returnee who received legal assistance from the CPS described being returned from Germany together with two families with small children. He was only given the address of the Kutina centre and was told to leave the airport immediately. Another individual reported spending two days at the airport without food or money until a local citizen helped her get in touch with CPS.<sup>232</sup>

The MDM-BELGIQUE reported that through their daily direct work with beneficiaries, they observed that many applicants for international protection returned under Dublin III Regulation suffer from various physical and/or mental health issues. In 2024, transfers included oncology patients, individuals with chronic illnesses, people with disabilities, children with developmental disorders and special needs, and individuals who had started treatment in their previous country of residence (including interruptions in hospitalization). There was also an increase in patients undergoing psychiatric and psychotherapeutic treatment for severe mental health conditions. It was noted that transfers often did not include the transfer of medical records, which delayed the continuation of treatment and disrupted the continuity of care for those arriving in Croatia under Dublin III. In 2024, there was also an increase in the number of applicants suffering from mental health disorders. Notably, 64% of patients with mental health conditions staying at the Reception Center for Applicants for International Protection in Zagreb were transferred under the Dublin III Regulation. These patients had previously been treated for various disorders, including paranoid schizophrenia, unspecified non-organic psychosis, suicidality, post-traumatic stress disorder, major depressive episodes, addiction syndrome, anxiety disorders, panic disorders, personality disorders, and adjustment disorders. In many cases, symptoms were exacerbated or new mental health issues developed after the transfer. This situation led to frequent crisis interventions and hospitalizations organized by the MDM-BELGIQUE team following transfers. Given the intense and often traumatic stress associated with involuntary transfers, it is crucial to highlight the retraumatizing risks of transferring applicants for international protection under Dublin III, especially for vulnerable individuals - people with pre-existing mental health conditions, severe chronic or acute conditions, individuals who have scheduled medical procedures, those subjected to force during transfer, people separated from family or support networks, and individuals who have lived in the transfer country for an extended period.<sup>233</sup>

The same was reported by the UNICEF Office in Croatia.<sup>234</sup>

According to information from the Croatian Red Cross (CRC),<sup>235</sup> during 2024 they encountered challenges in working with applicants for international protection who were returned under the Dublin procedure. Those applicants refused to cooperate with the staff of the Reception Center and to participate in social activities while expressing dissatisfaction with the accommodation and the Dublin return. A common problem with these applicants was medical assistance upon arrival (as they included persons who had undergone surgery immediately before return, mothers with newborns, persons with chronic diseases requiring necessary medications and treatment, etc.).

According to the report prepared by the Swiss Refugee Council,<sup>236</sup> the Croatian Red Cross (CRC) is informed by the Ministry of Interior about the number of announced Dublin transfers and later receives additional details about the number of people actually expected. Upon arrival in Croatia, the border police at the airport verify whether the individual has already submitted an application for international protection.

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<sup>232</sup> Information provided by Centre for Peace Studies, 27 February 2025.

<sup>233</sup> Information provided by MDM-BELGIQUE, 17 February 2025.

<sup>234</sup> Information provided by UNICEF Office for Croatia, 4 February 2025.

<sup>235</sup> Information provided by the Croatian Red Cross, 20 January 2025.

<sup>236</sup> Swiss Refugee Council: Reception conditions in Croatia: Report on the situation of asylum applicants and beneficiaries of international protection in Croatia, February 2025, available at: <https://www.refugeecouncil.ch/publications/dublin-state-situation-reports>.



If not, the transferred person is registered at the airport. According to information provided by the Ministry of Interior to the Swiss Refugee Council, the mode of transport to the reception centre varies depending on capacity: some arrivals are transported by the border police, others travel independently and, occasionally, staff from the reception centre pick up returnees at the airport.

Switzerland predominantly transfers very vulnerable individuals, seriously ill persons, and large families to Croatia. According to the CRC, incoming Dublin returnees are often transferred without their belongings. Those affected report that they were not given sufficient time to pack their suitcases before being transferred.

As for the transfers to Croatia, national courts developed different practices in the evaluation of the conditions that returnees would face in the Croatia (see more above under: [Suspension of transfers](#)).<sup>237</sup>

According to MdM-BELGIQUE, in 2024, it was observed, for a greater number of Dublin arrivals of applicants for international protection from other EU countries to Croatia, that the transfer of persons with serious illnesses does not include the transfer of their medical documentation, which delays the continuation of treatment and continuity of care for the most vulnerable applicants for international protection who were transferred to Croatia under the Dublin III Regulation.<sup>238</sup>

### **Caselaw from other Dublin countries regarding transfers to Croatia**

For examples of relevant case law from different EU+ countries on appeals against decisions allowing Dublin transfers to Croatia, see below.

**Germany:** After the Regional Administrative Court overturned the decision regarding a Dublin transfer of an Iraqi family to Croatia, the Federal Office for Migration and Refugees (BAMF) lodged an onward appeal. The Higher Administrative Court of Lower Saxony upheld the appeal and ruled that, although country information on Croatia showed that there were allegations of repeated pushbacks from Croatia to Serbia or Bosnia-Herzegovina, there was insufficient evidence that ‘chain deportations’ or other violations of rights under Article 4 of the EU Charter and Article 3 of the ECHR occurred for Dublin returnees. As regards reception conditions, the Court decided that the mere fact that two of the applicants were minors did not preclude the transfer to Croatia, because basic care was also sufficiently provided to families with minor children there.<sup>239</sup>

**Netherlands:** The Council of State ruled that the principle of mutual trust for Dublin transfers to Croatia may be relied upon. A Syrian applicant challenged a decision on a Dublin transfer, arguing that in Croatia he would be exposed to serious risks, including pushbacks and inadequate reception conditions. The Council of State referred to the CJEU judgments of *Jawo* (Case C-163/17) and *X v State Secretary for Justice and Security* (C-392/22). The Council found that, while pushbacks are conducted by Croatian authorities, there was insufficient evidence to conclude that Dublin claimants faced a real risk of being ill-treated. The Council stated that, according to available reports, Dublin claimants were admitted to the asylum procedure without any known obstacles following a transfer. The Council also noted that the mere theoretical possibility of a pushback because Dublin claimants cannot be distinguished from other asylum applicants, as they receive the same asylum applicant identification card, was not enough to establish a real risk as required by Dutch courts. The Council of State also held that access to reception facilities was generally sufficient, as Croatia had an occupation rate of approximately 61% by the end of 2023, and Croatia was largely a transit country with only a small fraction of arrivals applying for asylum and requiring accommodation. The Council also referenced the efforts of the authorities to manage inflow, noting that a new reception facility with 520 spaces opened in Dugi Dol in November 2023, aimed at assisting with initial registration and screening before transferring individuals to the main centres in Zagreb and Kutina. The

<sup>237</sup> ECRE, *The implementation of the Dublin III Regulation in 2020*, September 2021, available at: <https://bit.ly/3xjuHYr>.

<sup>238</sup> Information provided by MDM-BELGIQUE, 17 February 2025.

<sup>239</sup> EUAA: Quarterly Overview of Asylum Case Law, March 2024, available at: [https://euaa.europa.eu/sites/default/files/publications/2024-03/2024\\_EUAA\\_Quarterly\\_Overview\\_Asylum\\_Case\\_Law\\_Issue1\\_EN.pdf](https://euaa.europa.eu/sites/default/files/publications/2024-03/2024_EUAA_Quarterly_Overview_Asylum_Case_Law_Issue1_EN.pdf).

Council also noted that reports from the Croatian Law Centre and the Croatian Ombudsperson confirmed that instances of overcrowding were isolated rather than systemic issues. The Council found no evidence that the applicant's individual circumstances would result in a real risk of ill-treatment, as Croatia provided asylum applicants with access to the procedure and to reception, as well as an asylum applicant identification card and legal assistance.<sup>240</sup>

**Slovenia:** In Slovenia, the Supreme Court determined that there were no personal circumstances that would prevent the transfer of the applicants to Croatia owing to a well-founded risk of inhuman or degrading treatment under the Dublin III Regulation. In appeals against decisions on Dublin transfers to Croatia, the Supreme Court ruled that the applicants did not provide any arguments or evidence on personal circumstances that would lead to a risk of inhuman or degrading treatment upon a transfer. The Supreme Court found in the second case that allegations of pushbacks in Croatia as evidence of systematic deficiencies in the asylum procedure were irrelevant because upon a Dublin transfer the applicant will already have the status of an applicant for international protection under the Dublin III Regulation.<sup>241</sup>

In another case, the Slovenian Supreme Court ruled that there were no systemic deficiencies in Croatia's asylum and reception system that would prevent the applicant and their minor child from being transferred under the Dublin III Regulation, citing the principle of mutual trust, and that the minor's situation did not constitute an exceptional circumstance that would violate Article 4 of the EU Charter upon transfer. The case concerned a family with a 6-month-old child that contested a decision regarding a Dublin transfer to Croatia on grounds of inadequate reception conditions and an alleged violation of the principle of the best interests of the child. The Administrative Court allowed the appeal and stated that the Ministry of Interior incorrectly assessed the best interest of the child and that individual guarantees were needed. In an onward appeal submitted by the Ministry of the Interior, however, the Supreme Court overturned the lower court's decision and reiterated the scope of the principle of mutual trust between Member States. It stated that a breach of the recast RCD is not sufficient to rebut such a presumption. On the best interest of the child, it found it to be unproven that the child faced any exceptional situation preventing the transfer. The court underlined that the lower court requested too high standards when conditioning the transfer to an equivalent accommodation in Slovenia.<sup>242</sup>

In the third case the Supreme Court confirmed the Administrative Court's decision that there is a distinction between the police treatment of those who illegally cross the border and the treatment of those transferred to Croatia under the Dublin III Regulation, concluding that there were no systemic deficiencies in Croatia preventing the Dublin transfer. In an onward appeal, the Supreme Court confirmed the lower court's decision which validated the transfer. The court clarified that the alleged mistreatment by the police cannot be claimed as if there was a difference between foreigners who illegally enter and may face mistreatment, and those who are transferred under the Dublin III Regulation and have the status of applicants for international protection. The court reiterated the findings in the cases of *MSS v Belgium and Greece* from the ECtHR and *X v State Secretary for Justice and Security* from the CJEU to state that Member States have a duty, on their own initiative, to consider any information on possible systemic deficiencies which they are or should be aware of that can lead to a treatment contrary to Article 4 of the EU Charter. However, the court ruled that this obligation does not apply *ex officio* and without any procedural obligation for the applicant to adduce evidence, based on publicly available information, to shift the burden of proof to the Ministry of the Interior.<sup>243</sup>

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<sup>240</sup> EUAA: Quarterly Overview of Asylum Case Law, December 2024, available at: [https://euaa.europa.eu/sites/default/files/publications/2024-12/2024\\_EUAA\\_Quarterly\\_Overview\\_Asylum\\_Case\\_Law\\_Issue4\\_EN.pdf](https://euaa.europa.eu/sites/default/files/publications/2024-12/2024_EUAA_Quarterly_Overview_Asylum_Case_Law_Issue4_EN.pdf).

<sup>241</sup> EUAA: Quarterly Overview of Asylum Case Law, June 2024, available at: [https://euaa.europa.eu/sites/default/files/publications/2024-06/2024\\_EUAA\\_Quarterly\\_Overview\\_Asylum\\_Case\\_Law\\_Issue2\\_EN.pdf](https://euaa.europa.eu/sites/default/files/publications/2024-06/2024_EUAA_Quarterly_Overview_Asylum_Case_Law_Issue2_EN.pdf).

<sup>242</sup> EUAA: Quarterly Overview of Asylum Case Law, September 2024, available at: [https://euaa.europa.eu/sites/default/files/publications/2024-09/2024\\_EUAA\\_Quarterly\\_Overview\\_Asylum\\_Case\\_Law\\_Issue3\\_EN.pdf](https://euaa.europa.eu/sites/default/files/publications/2024-09/2024_EUAA_Quarterly_Overview_Asylum_Case_Law_Issue3_EN.pdf).

<sup>243</sup> EUAA: Quarterly Overview of Asylum Case Law, September 2024, available at: [https://euaa.europa.eu/sites/default/files/publications/2024-09/2024\\_EUAA\\_Quarterly\\_Overview\\_Asylum\\_Case\\_Law\\_Issue3\\_EN.pdf](https://euaa.europa.eu/sites/default/files/publications/2024-09/2024_EUAA_Quarterly_Overview_Asylum_Case_Law_Issue3_EN.pdf).

### 3. Admissibility procedure

#### 3.1. General (scope, criteria, time limits)

No specific procedure is designated as “admissibility procedure” in Croatia. However, it is possible for the Department for International Protection procedure to take a decision without entering into a further in-depth examination of the application (i.e., an examination on the merits) when the grounds for the dismissal of the application are met.

An application will be dismissed where:<sup>244</sup>

- (1) The applicant has been granted international protection in another Member State of the European Economic Area;
- (2) The applicant has been granted international protection in a third state whose rights they still enjoy, including the guarantees stemming from *non-refoulement*, provided that they will be received back into that state;
- (3) It is possible to apply the concept of [Safe Third Country](#);
- (4) It is possible to apply the concept of European safe third country;
- (5) The responsibility of another Member State of the European Economic Area is established to consider the application; or
- (6) The application was lodged by a national of a Member State of the European Union.

There are no specific time limits that must be respected by the Ministry of Interior in the first instance procedure for delivering a dismissal decision, and the rules governing the regular procedure are applicable.

In case of a subsequent application,<sup>245</sup> the admissibility of the application shall be assessed on the basis of the facts and evidence it contains, and in connection with the facts and evidence already used in the previous procedure. If it is established that the subsequent application is admissible, a decision shall be issued once again on the merits of the application, and the previous decision would be revoked.

The subsequent application would be dismissed if it is established that it is inadmissible, i.e., if the subsequent application is not comprehensible and does not contain relevant facts and evidence which arose after the decision on the first application became final or which the applicant for justified reasons did not present during the previous procedure relating to establishing the meeting of the conditions for approval of international protection (see [Subsequent Applications](#)).

In 2024, the Ministry of the Interior dismissed 232 applications on inadmissibility grounds. The reasons were as follows: for 41 applicants Article 43 para. 1 item 1 of the LITP was invoked (i.e., they were granted international protection in another EEA Member State); for 152 applicants on the basis of Article 43 para. 1 item 5 of the LITP (i.e., the responsibility of another EEA Member State for examining the application had been established); for 2 applicants on the basis of Article 43 para. 1 item 6 of the LITP (i.e., the applicant was a national of an EU Member State), and for 37 applicants on the basis of Article 43 para. 2 of the LITP (i.e., the dismissal of a subsequent application if it is determined that such an application is inadmissible in accordance with Article 47, para. 6 of the LITP).<sup>246</sup>

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<sup>244</sup> Article 43(1) LITP.

<sup>245</sup> Article 47 LITP.

<sup>246</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).

### 3.2. Personal interview

#### Indicators: Admissibility Procedure: Personal Interview

☐ Same as regular procedure

1. Is a personal interview of the asylum applicant in most cases conducted in practice in the admissibility procedure?  
☐ Yes ☒ No  
❖ If so, are questions limited to identity, nationality, travel route? ☐ Yes ☒ No  
❖ If so, are interpreters available in practice, for interviews? ☒ Yes ☐ No
2. Are interviews conducted through video conferencing? ☐ Frequently ☐ Rarely ☒ Never

The interview is conducted by the Ministry of Interior (i.e., by decision makers from the Department for International Protection Procedure). According to the LITP, the personal interview would not be undertaken if the admissibility of a subsequent application is being assessed.<sup>247</sup> In such cases, usually the applicant only makes the application in writing i.e., fills in the form stating the reasons for their subsequent application and explaining why those reasons were not mentioned in the previous procedure. If the person is illiterate, this can be done orally on the record.

### 3.3. Appeal

#### Indicators: Admissibility Procedure: Appeal

☐ Same as regular procedure

1. Does the law provide for an appeal against an inadmissibility decision?  
☒ Yes ☐ No  
❖ If yes, is it ☒ Judicial ☐ Administrative  
❖ If yes, is it suspensive ☐ Yes ☒ Some grounds ☐ No

According to the LITP the deadline for appealing a dismissal decision before the Administrative Court is eight days after the delivery of the decision of the Ministry of Interior.<sup>248</sup>

As for suspensive effect, the LITP provides all lawsuits with suspensive effect, except for lawsuits against dismissal decisions on “first country of asylum” grounds where the applicant has been granted international protection in another third country whose rights they still enjoy, including the guarantees arising from **non refoulement**, provided that the applicant will be received back into that country or in a Member State of the EEA or when a subsequent application is dismissed as inadmissible.<sup>249</sup>

### 3.4. Legal assistance

#### Indicators: Admissibility Procedure: Legal Assistance

☒ Same as regular procedure

1. Do asylum applicants have access to free legal assistance at first instance in practice?  
☐ Yes ☐ With difficulty ☒ No  
❖ Does free legal assistance cover: ☐ Representation in interview  
☐ Legal advice
2. Do asylum applicants have access to free legal assistance on appeal against an inadmissibility decision in practice?  
☒ Yes ☐ With difficulty ☐ No  
❖ Does free legal assistance cover ☒ Representation in courts  
☒ Legal advice

Regarding free legal assistance in “inadmissible” cases, the general provisions about the right and access to free legal assistance apply, meaning that free legal aid in terms of representation is not foreseen in the

<sup>247</sup> Article 35(8)(3) LITP.

<sup>248</sup> Article 43(3) LITP.

<sup>249</sup> Article 51(1)(2)-(3) LITP, citing Article 43(1)(1)-(2) and Article 43(2) LITP.

first instance procedure, but only in the preparation of a lawsuit to the Administrative Court, including representation before the Administrative Court,<sup>250</sup> if requested by the applicant (see section on [Regular procedure – Legal assistance](#)).

### 3.5. Suspension of returns for beneficiaries of protection in another Member State

No information is available on suspension of returns for beneficiaries of protection in another Member State.

## 4. Border procedure (border and transit zones)

### 4.1. General (scope, time limits)

#### Indicators: Border Procedure: General

1. Do border authorities receive written instructions on the referral of asylum seekers to the competent authorities? ☒ Yes ☐ No
2. Where is the border procedure mostly carried out? ☐ Air border ☐ Land border ☐ Sea border
3. Can an application made at the border be examined in substance during a border procedure? ☐ Yes ☒ No
4. Is there a maximum time limit for a first instance decision laid down in the law? ☒ Yes ☐ No  
❖ If yes, what is the maximum time limit? 4 weeks
5. Is the asylum seeker considered to have entered the national territory during the border procedure? ☐ Yes ☐ No

The LITP foresees a border procedure. Two Transit Centres for Foreigners were built and opened in 2017, one in **Tovarnik** at the border with Serbia and another in **Trilj** near the border with Bosnia and Herzegovina.

At the moment, the border procedure provided under the LITP does not take place in those two centres. According to information provided by the Ministry of Interior in March 2024, the border procedure is not being applied in Croatia.<sup>251</sup>

According to the LITP, the border procedure would be applicable to foreigners who express the intention of lodging an application or make a subsequent application at a border crossing point or in a transit zone of an airport, seaport or internal water port, provided that the following conditions are met:

- ❖ The applicant is provided with material reception conditions; and
- ❖ The application or subsequent application may be rejected as manifestly unfounded if the applicant does not meet the conditions for asylum (refugee status) or subsidiary protection and conditions are met for the accelerated procedure to be conducted, or the application or subsequent application may be dismissed in accordance with Article 43 LITP.<sup>252</sup>

<sup>250</sup> Article 60 LITP.

<sup>251</sup> Information provided by the Ministry of Interior, 8 March 2024.

<sup>252</sup> Article 42(1) LITP. Article 43 LITP establishes: “(1) *The Ministry shall render a decision dismissing an application if: 1. the applicant has been granted international protection in another Member State of the European Economic Area; 2. the applicant has been granted international protection in a third country whose rights they still enjoy, including the guarantees arising from Article 6 of this Act, provided that the applicant will be received back into that country; 3. it is possible to apply the concept of a safe third country pursuant to Article 45 of this Act; 4. it is possible to apply the concept of a European safe third country, pursuant to Article 46 of this Act; 5. the responsibility of another Member State of the European Economic Area to examine the application has been established; 6. the application was lodged by a national of a Member State of the European Union.* (2) *The Ministry shall render a decision to dismiss a subsequent application if it assesses that it is inadmissible pursuant to Article 47, paragraph 6 of this Act.* (3) *No appeal is permitted against a decision to dismiss an application or subsequent application, but it is possible to bring law suit before the Administrative Court pursuant to Article 51 of this Act within eight days of the day of service of the decision.*”

However, if a decision concerning the application is not issued within the period of 28 days from the day of the lodging of the application for international protection, the applicant would be permitted entry to the Republic of Croatia with a view to conducting the regular procedure.<sup>253</sup>

## 4.2. Personal interview

As border procedures is not conducted at the moment, no information can be provided on personal interviews.

## 4.3. Appeal

### Indicators: Border Procedure: Appeal

☒ Same as regular procedure

1. Does the law provide for an appeal against the decision in the border procedure?

❖ If yes, is it

❖ If yes, is it suspensive

☒ Yes ☐ No

☒ Judicial ☐ Administrative

☒ Yes ☐ Some grounds ☐ No

The border procedure is foreseen by the LITP, but it is not applied in practice. By law, lawsuits against decisions in the border procedure have a suspensive effect,<sup>254</sup> and are subject to shorter time limits: a lawsuit to the Administrative Court against a decision of the Ministry of Interior made in the border procedure must be lodged within five days from the day of the delivery of the decision. The Ministry shall deliver the case file no later than eight days from the day of receipt of the decision by which the Administrative Court requests the case file. The Administrative Court shall issue a judgment within eight days from the day of receipt of the case file.<sup>255</sup>

## 4.4. Legal assistance

### Indicators: Border Procedure: Legal Assistance

☒ Same as regular procedure

1. Do asylum applicants have access to free legal assistance at first instance in practice?

☐ Yes

☐ With difficulty

☒ No

❖ Does free legal assistance cover: ☐ Representation in interview

☐ Legal advice

2. Do asylum applicants have access to free legal assistance on appeal against a negative decision in practice?

☒ Yes

☐ With difficulty

☐ No

❖ Does free legal assistance cover ☒ Representation in courts

☒ Legal advice

According to the LITP, applicants in all types of procedures shall have access to free State-funded legal aid in the preparation of a lawsuit to the Administrative Court, including representation before the Administrative Court if so requested by the applicants. However, this could be restricted, as the LITP allows the possibility to temporarily restrict access to locations where border procedure is conducted (and therefore to applicants accommodated there) for the applicant's legal representative or a representative of an organisation engaged in the protection of refugee rights, other than UNHCR, when it is necessary for the protection of the national security and legal order of the Republic of Croatia.<sup>256</sup>

<sup>253</sup> Article 42(4)-(5) LITP.

<sup>254</sup> Article 51(1) LITP:

<sup>255</sup> Article 42(6) LITP.

<sup>256</sup> Article 42(3) LITP.



## 5. Accelerated procedure

### 5.1. General (scope, grounds for accelerated procedures, time limits)

According to the LITP the Ministry shall take a decision in an accelerated procedure where:<sup>257</sup>

1. The applicant has presented only facts which are irrelevant to an assessment of the merits of the application;
2. The applicant has consciously misled the Ministry by presenting false information or unreliable documents, or by not providing relevant information or by concealing documents which could have had a negative effect on the decision;
3. The applicant in bad faith has probably acted and destroyed documents that establish identity and/or nationality with the aim to provide false information about their identity and/or nationality;
4. The applicant has presented inconsistent, contradictory, manifestly inaccurate or unconvincing statements contrary to the verified information on the country of origin, rendering his/her application unreliable;
5. A subsequent application is admissible;
6. The applicant has already resided for a longer period of time in the Republic of Croatia and for no justifiable reason failed to express their intention to apply for international protection earlier;
7. The applicant expressed the intention to apply for international protection for the clear purpose of postponing or preventing the enforcement of a decision which would result in their expulsion from the Republic of Croatia;
8. The applicant represents a risk for the national security or public order of the Republic of Croatia;
9. It is possible to apply the concept of [Safe Country of Origin](#); or
10. The applicant has refused to give fingerprints.

The Department for International Protection Procedure within the Ministry of Interior is responsible for taking decisions in accelerated procedures. The LITP has set a two-month deadline for completing the accelerated procedure, failing which the application is transferred to the regular procedure.<sup>258</sup>

The provisions of LITP related to the accelerated procedure shall not apply to applicants who are in need of special procedural guarantees, especially victims of torture, rape, or another form of serious psychological, physical, or sexual violence, if it is not possible to provide the appropriate support.<sup>259</sup> Those provisions shall neither apply to applications of unaccompanied children, except when:

- ❖ a subsequent application is admissible; or
- ❖ the applicant represents a risk to the national security or public order of the Republic of Croatia; or
- ❖ it is possible to apply the concept of a safe country of origin.<sup>260</sup>

In 2024, 14 applicants for international protection were processed in an accelerated procedure, pursuant to Article 41 of the LITP. They were nationals of Algeria, Burundi, Morocco, Nepal, Serbia, Tunisia, and Türkiye, while one person was stateless.<sup>261</sup>

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<sup>257</sup> Article 41(1) LITP.

<sup>258</sup> Article 41(1) LITP.

<sup>259</sup> Article 15(3) LITP.

<sup>260</sup> Article 17 (10) LITP.

<sup>261</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).



## 5.2. Personal interview

### Indicators: Accelerated Procedure: Personal Interview

☒ Same as regular procedure

1. Is a personal interview of the asylum applicant in most cases conducted in practice in the accelerated procedure?  
☒ Yes ☐ No  
❖ If so, are questions limited to nationality, identity, travel route? ☐ Yes ☒ No  
❖ If so, are interpreters available in practice, for interviews? ☒ Yes ☐ No
2. Are interviews conducted through video conferencing? ☐ Frequently ☐ Rarely ☒ Never

The same provisions from the LITP on the personal interview in a **regular procedure** apply to the one in accelerated procedures. That means that the interview in accelerated procedure is not held only in specific cases prescribed by the LITP, i.e., when:

- ❖ A positive decision on application may be taken on the basis of the available evidence;
- ❖ In cases when an applicant is unfit or unable to be interviewed, owing to enduring circumstances beyond their control; or
- ❖ The admissibility of a subsequent application is being assessed.<sup>262</sup>

The Department for International Protection Procedure of the Ministry of Interior is responsible for conducting the interviews and taking a decision.

## 5.3. Appeal

### Indicators: Accelerated Procedure: Appeal

☐ Same as regular procedure

1. Does the law provide for an appeal against the decision in the accelerated procedure?  
☒ Yes ☐ No  
❖ If yes, is it ☒ Judicial ☐ Administrative  
❖ If yes, is it suspensive ☐ Yes ☐ Some grounds ☒ No

The Administrative Court is the competent court in the accelerated procedure, so there is no difference in the authority responsible for handling the lawsuit compared to the regular procedure. However, time limits are shorter: a lawsuit may be lodged to the Administrative Court within eight days from the delivery of the decision of the Ministry of Interior.<sup>263</sup>

Moreover, lawsuits against negative decisions in the accelerated procedures do *not* have suspensive effect.<sup>264</sup> The applicant can apply for suspensive effect. The Ministry of Interior shall deliver the case file, no later than 8 days from the day of receipt of the decision by which the Administrative Court requests the case file in order to decide on the request for suspensive effect and the Court has to decide on it within eight days from the receipt of case file. However, lawsuits against decisions in cases where the applicant has already resided for a longer period of time in the Republic of Croatia and for no justifiable reason failed to express their intention to apply for international protection earlier *never* have suspensive effect, i.e., there is no possibility to request suspensive effect.<sup>265</sup>

<sup>262</sup> Article 35(8) LITP.

<sup>263</sup> Article 41(5) LITP.

<sup>264</sup> Article 51(1)(1) LITP.

<sup>265</sup> Article 51(1)(2) LITP, citing Article 41(1)(6) LITP.

## 5.4. Legal assistance

### Indicators: Accelerated Procedure: Legal Assistance

☒ Same as regular procedure

1. Do asylum applicants have access to free legal assistance at first instance in practice?  
☐ Yes ☐ With difficulty ☒ No  
❖ Does free legal assistance cover: ☐ Representation in interview  
☐ Legal advice
2. Do asylum applicants have access to free legal assistance on appeal against a negative decision in practice?  
☒ Yes ☐ With difficulty ☐ No  
❖ Does free legal assistance cover ☒ Representation in courts  
☒ Legal advice

The same provisions from the LITP as regards access to free legal assistance for applicants in the regular procedure for international protection apply for access to free legal assistance during an accelerated procedure, meaning that free legal aid includes assistance in the preparation of a lawsuit to the Administrative Court and representation before the Administrative Court, if requested by the applicant (see section on [Regular procedure – Legal assistance](#)).

## 6. National protection statuses and return procedure

### 6.1. National forms of protection

LITP does not provide national forms of protection. There is, however, the possibility of granting a temporary stay on humanitarian grounds to, among others, survivors of trafficking in human beings (see [Guarantees for vulnerable groups of asylum applicants](#)).

### 6.2. Return procedure

When taking a negative decision on an application for international protection it shall also be decided on a measure to ensure the return of the applicant pursuant to the provisions of the Law on Foreigners. When determining a return measure, priority shall be given to voluntary departure, unless the application has been rejected as manifestly unfounded because the applicant does not meet the conditions for asylum or subsidiary protection and circumstances exist for a decision to be made in an accelerated procedure, or a subsequent application has been dismissed as inadmissible.<sup>266</sup> In practice, this usually means that the decision sets a deadline for leaving the European Economic Area. In accordance with the Law on Foreigners, when determining the deadline for voluntary departure, personal circumstances are taken into account, and the deadline may not be shorter than 7 days or longer than 30 days.

In 2024, Croatia launched some new AMIF-funded initiatives to support the return of former applicants for international protection. These included a project to establish a more effective and equitable return system, to ensure access to legal assistance and representation during return procedures, as well as dedicated activities aimed at facilitating translation and interpretation throughout the return process.<sup>267</sup>

<sup>266</sup> Article 37 LITP.

<sup>267</sup> EUAA: National Asylum Developments 2025, page 22, available at: [https://euaa.europa.eu/sites/default/files/publications/2025-06/2025\\_National\\_Asylum\\_Developments\\_EN.pdf](https://euaa.europa.eu/sites/default/files/publications/2025-06/2025_National_Asylum_Developments_EN.pdf).

## D. Guarantees for vulnerable groups of asylum applicants

### 1. Identification

#### Indicators: Identification

1. Is there a specific identification mechanism in place to systematically identify vulnerable asylum applicants? ☐ Yes ☐ For certain categories ☒ No  
❖ If for certain categories, specify which:
2. Does the law provide for an identification mechanism for unaccompanied children? ☒ Yes ☐ No

According to the LITP, vulnerable groups include persons without legal capacity, children, unaccompanied children, elderly and infirm persons, seriously ill persons, disabled persons, pregnant women, single parents with minor children, persons with mental disorders and victims of trafficking, as well as victims of torture, rape or other forms of psychological, physical and sexual violence, such as victims of female genital mutilation.<sup>268</sup>

#### 1.1. Screening of vulnerability

The LITP has introduced special procedural and reception guarantees.<sup>269</sup> It specifies that appropriate support must be provided to applicants in relation to their personal circumstances, amongst other things their age, sex, sexual orientation, gender identity, disability, serious illness, mental health, or as a consequence of torture, rape or other serious forms of psychological, physical or sexual violence, for the purpose of exercising the rights and obligations from the LITP. The procedure of recognising the personal circumstances of applicants shall be conducted continuously by specially trained police officers, employees of the Ministry of Interior and other competent bodies, from the moment of the expression of intention to apply for international protection until the delivery of the decision on the application.

There is no further detailed guidance available in the law, nor an early identification mechanism in the form of internal guidance, according to the knowledge of Croatian Law Centre.

Early identification is conducted by the police officers in accordance with the Article 15 LITP at the moment of the expression of the intention to apply for international protection. Police then accordingly inform the Reception Centre for Applicants for International Protection and further identification during the procedure for international protection is done by social workers of the Reception Centre as well as employees of NGOs with which the Ministry has cooperation agreements and who come into first contact with applicants when they arrive in the centres.<sup>270</sup>

According to the Ministry of the Interior, in 2024, there were 1,980 unaccompanied asylum-seeking children in Croatia.<sup>271</sup> However, data on other members of vulnerable groups are not made publicly available by the Ministry of the Interior.

In the Ombudsperson's for Children 2024 report it is highlighted that the issue of the lack of centralized data collection on unaccompanied children persists<sup>272</sup>. Data under the jurisdiction of the Ministry of the Interior and the social welfare system are neither unified nor comparable. Furthermore, although there is an exchange of information between ministries and service providers, the data differ both within and between sectors. The establishment of a central database would allow for accurate insight into the number of unaccompanied children present in the country, their accommodation and legal status, as well as data on their inclusion in education and the assignment of guardians. Organisations working with children have

<sup>268</sup> Article 4(1)(14) LITP.

<sup>269</sup> Article 15 LITP.

<sup>270</sup> ECRE, *Balkan route reversed*, December 2016, p. 26, available at: <https://bit.ly/3mWZAyE>.

<sup>271</sup> Ministry of Interior, Statistics 2024, available at: <https://mup.gov.hr/UserDocsImages/statistika/2025/1/Statistika%20medjunarodna%20zastita%202024.xlsx>.

<sup>272</sup> This does not apply only to unaccompanied children who are applicants for international protection.

pointed to the absence of a unified system for collecting data on unaccompanied minors. The need to interconnect various data systems has also been recommended to Croatia by the UN Committee on the Rights of the Child in its concluding observations on the fifth and sixth periodic reports on the state of children's rights.<sup>273</sup>

Furthermore, the Ombudswoman for Children stated that in 2024, 1,980 children requested international protection. Unaccompanied children most often do not wait for a decision on their application for international protection, mainly because Croatia is a transit point on their journey.

International protection was granted to 41 children, one of whom was an unaccompanied child. Regardless of the year in which the application was submitted, in 2024 the Ministry of the Interior issued 718 decisions for unaccompanied children, most of which (704) were a suspension, 10 applications were dismissed, and three were rejected. The reasons for the suspension of the procedures in the majority of cases was a failure to respond to the invitation to a interview. Two lawsuits were filed against the decisions of the Ministry of the Interior.<sup>274</sup>

In April 2021, a Standard Operational Procedure (SOP) in Cases of Sexual and Gender-Based Violence (SGBV) in the Reception Centres for Applicants of International Protection entered into force. The SOP was developed in cooperation with the Ministry of Interior, UNHCR, IOM, MDM-BELGIQUE, the Croatian Red Cross and the Croatian Law Centre. SOP contain procedures, roles, and responsibilities of service providers involved in the prevention and response to SGBV in the reception centres.

Regular meetings of involved organisations and the Ministry of Interior are held each year to discuss current trends, statistical data, actions taken to strengthen prevention of further violence and ensure adequate support for victims, actions that will be taken in coming period, annual reports on SGBV, the method of data collection and their purpose, etc.

In 2024, the Coordination Group for Sexual and Gender-Based Violence held four meetings, co-convened by the Ministry of the Interior and UNHCR, in order to strengthen prevention of, and response to, GBV. Participants responded to reports of GBV, including sexual harassment, through targeted actions and preventative campaigns.<sup>275</sup>

MDM-BELGIQUE reported that compared to previous years, in 2024 a decrease in cases of sexual and gender-based violence (SGBV) was recorded with 63 cases (compared to 106 in 2023). MDM-BELGIQUE provided appropriate psychological support, psychiatric treatment, and further referrals for all survivors of violence, in collaboration with relevant service providers.<sup>276</sup>

The Ombudsperson for Gender Equality has reported that the Ministry of Interior keeps records of vulnerable groups of applicants seeking international protection. According to data provided by the Ministry of the Interior, in 2024 a total of 40 women and 25 men accommodated in the Reception Centres for Applicants for International Protection in Zagreb and Kutina reported being victims of gender-based violence. The Mol's records indicate that these individuals were subjected to multiple forms of violence. Specifically, 19 female applicants and 2 male applicants reported having experienced sexual violence; 19 female applicants and 16 male applicants were exposed to physical violence; and 31 female applicants and 19 male applicants were subjected to psychological violence. Furthermore, 5 female applicants and 1 male applicant were identified as having been exposed to harmful traditional practices, while 1 female applicant reported experiencing socio-economic violence. Additionally, 13 male applicants for international protection were identified as victims of torture in their country of origin, and 9 male applicants reported being subjected to physical violence. All identified persons who had survived some form of violence were referred to

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<sup>273</sup> Ombudswoman for Children: *Report on the work of the Ombudswoman for Children in 2024*, page 204, available at: <https://dijete.hr/hr/download/izvjesce-o-radu-pravobraniteljice-za-djecu-za-2024-godinu/>.

<sup>274</sup> Ombudswoman for Children: *Report on the work of the Ombudswoman for Children in 2024*, page 199, available at: <https://dijete.hr/hr/download/izvjesce-o-radu-pravobraniteljice-za-djecu-za-2024-godinu/>.

<sup>275</sup> Information provided by the UNHCR Office for Croatia, 18 March 2025.

<sup>276</sup> Information provided by MDM-BELGIQUE, 17 February 2025.

organisations that provide support in the Reception Centres (i.e., to the Croatian Red Cross and Médecins du Monde).<sup>277</sup>

According to the Mol's data, in 2024, asylum was granted to three women victims of human trafficking and 8 women victims of gender-based violence.<sup>278</sup>

In 2024, within the framework of a project funded by UNHCR and in cooperation with the Agency for Education and Training, the Croatian Red Cross conducted an online training session on the topic of gender-based violence prevention among migrants and refugees. The training was attended by 243 professional associates from primary and secondary schools across the Republic of Croatia.<sup>279</sup>

In September 2023, the Council of Europe Expert Group on Action against Violence against Women and Domestic Violence (GREVIO) published its baseline evaluation report on Croatia.<sup>280</sup> GREVIO is concerned that gender-based violence-related claims to international protection are either not being recorded in the system or identified during the refugee status determination process. In its report, GREVIO commended the SOP but also stated that although there is a useful standardised form for reporting incidents of sexual and gender-based violence, staff in Reception Centre have a requirement to report any instance of violence irrespective of whether the woman gives her consent and women are not informed of this requirement until the end of the process. According to GREVIO, to empower women, they should be informed at the outset of the interview that there is a legal requirement on the interviewer to pass on information. This would enable the victims to make an informed decision on whether to continue with the interview. It would also be more effective if the protocol was applied to all asylum-seeking women and migrants at the borders and elsewhere, not just those in accommodation centres.<sup>281</sup>

In 2022, the Governmental Office for Gender Equality, in cooperation with the Ministry of Interior and UNHCR, published a leaflet intended to inform victims of gender-based violence about available protection options and services. The leaflet is intended primarily for female migrants, refugees and applicants for international protection, although it acknowledges that gender-based violence can be committed against men. It is available in 8 languages (Arabic, Croatian, English, Farsi, French, Kurdish, Turkish and Urdu).<sup>282</sup>

In addition, in accordance with the Protocol on identification, assistance and protection of victims of human trafficking, identification of victims of human trafficking is carried out by the Ministry of Interior (Mol) in cooperation with the Croatian Red Cross and civil society organisations. If the victim is a child, the Mol will cooperate in the identification procedure with the ministry responsible for social welfare affairs and civil society organisations.<sup>283</sup>

This is prescribed by the Law on Foreigners which states that a temporary stay on humanitarian grounds shall be granted to a third-country national if, as a victim of trafficking in human beings a person has accepted a programme of assistance and protection.<sup>284</sup> The identification of the victim is carried out by the

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<sup>277</sup> Ombudswoman for Gender Equality, Report of the Ombudswoman for Gender Equality for 2024, page 262, available at: [https://www.prs.hr/application/uploads/Izvjesje%CC%8Cc%CC%81e\\_2024\\_CJELOVITO\\_FINAL\\_.pdf](https://www.prs.hr/application/uploads/Izvjesje%CC%8Cc%CC%81e_2024_CJELOVITO_FINAL_.pdf).

<sup>278</sup> Ombudswoman for Gender Equality, Report of the Ombudswoman for Gender Equality for 2024, page 260, available at: [https://www.prs.hr/application/uploads/Izvjesje%CC%8Cc%CC%81e\\_2024\\_CJELOVITO\\_FINAL\\_.pdf](https://www.prs.hr/application/uploads/Izvjesje%CC%8Cc%CC%81e_2024_CJELOVITO_FINAL_.pdf).

<sup>279</sup> Croatian Red Cross: Annual report on the work of the Croatian Red Cross in 2024, page 87, available at: <https://www.hck.hr/UserDocImages/vijesti/2025/AD%205%20Izvje%C5%A1%C4%87e%20o%20radu%20HCK%20u%202024.pdf?vel=5096156>.

<sup>280</sup> GREVIO: (Baseline) Evaluation Report on legislative and other measures giving effect to the provisions of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention)-CROATIA; available at: <https://bit.ly/4bdxB10>, 79.

<sup>281</sup> GREVIO: (Baseline) Evaluation Report on legislative and other measures giving effect to the provisions of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention)-CROATIA; available at: <https://bit.ly/4bdxB10>.

<sup>282</sup> Office for Gender Equality, *The Office for Gender Equality published a leaflet for female migrants, refugees and asylum seekers*, available in Croatian at: <https://bit.ly/3FNHzte>.

<sup>283</sup> Protocol on identification, assistance and protection of victims of human trafficking, available in Croatian at: <https://bit.ly/3KQbMdk>.

<sup>284</sup> Article 79 (1) (1), Law on Foreigners.

Ministry of the Interior in cooperation with civil society organizations. In cases involving a child who is a victim of trafficking in human beings, the Ministry of the Interior is also obliged to cooperate with the ministry responsible for social welfare. The programme of assistance and protection includes healthcare and psychosocial support, safe accommodation, translation and interpreting services, legal aid, and safe return to the country of origin.<sup>285</sup> A third-country national identified as a victim of trafficking has the right to decide on participation in the programme of assistance and protection within 60 days.<sup>286</sup> The guardian of a child who has been identified as a victim of trafficking in human beings has the right, with the consent of the locally competent branch office of the Croatian Social Welfare Institute, to decide on participation in the programme of assistance and protection within 90 days, taking into account the best interests of the child and considering the child's opinion.<sup>287</sup>

A delegation of the Council of Europe's Group of Experts on Action against Trafficking in Human Beings (GRETA) carried out an evaluation visit to Croatia on 3-7 June 2024, as part of the fourth evaluation round of the Convention on Action against Trafficking in Human Beings. The visit, amongst others, provided an opportunity to visit a shelter for adult victims of human trafficking, as well as the reception centre for applicants for international protection in Zagreb.<sup>288</sup>

The 2025 GRETA report,<sup>289</sup> which followed after the visit, covers the period 2020-2024 and evaluates the measures taken by Croatia to prevent vulnerabilities to trafficking in human beings, detect and support vulnerable victims, and punish the offenders. The report highlighted a concern about the lack of screening for vulnerabilities and trafficking indicators at the border and at the Dugi Dol registration centre, where applicants for international protection express their intent to seek international protection. However, as stated in the report, many applicants for international protection, including potential trafficking victims, continue their journey to other EU countries without further contact with the authorities. Reports indicate that some applicants for international protection have been asked to sign declarations of voluntary return and/or to suspension of the procedure for granting international protection. GRETA highlighted the need for enhanced training for the border police and the staff of the Dugi Dol registration centre on identifying vulnerabilities and signs of trafficking.

While recognising the challenges of Croatia mainly being a transit country for migrants including applicants for international protection, GRETA urges the Croatian authorities to take measures to prevent applicants for international protection from becoming victims of trafficking, in particular by:

- *putting in place procedures for screening of applicants for international protection for vulnerabilities throughout the country, including at border crossing points;*
- *providing training on trafficking in human beings to border and local police officers, as well as other relevant officials, with a focus on vulnerabilities that lead to trafficking in human beings and on early detection of cases of THB among applicants for international protection.*
- *Further, GRETA considers that the Croatian authorities should systematically provide information to applicants for international protection, in a language they can understand, about the risks of trafficking in human beings as well as their rights as applicants for international protection and as victims of trafficking in human beings, and how to contact NGOs specialised in trafficking in human beings which do not have access to the reception centres for applicants for international protection and obtain assistance.*

The Centre for Peace Studies (CPS) reported that, in 2023, they observed deficiencies in the identification of applicants for international protection as victims of human trafficking despite the existence of statements, documentation and other evidence that point to the existence of said criminal act. The CPS also reported that the system of identifying vulnerable groups within the Reception Centre for Applicants for International

<sup>285</sup> Article 80 (1)- (2), Law on Foreigners

<sup>286</sup> Article 81 (1), Law on Foreigners

<sup>287</sup> Article 81 (2), Law on Foreigners

<sup>288</sup> Council of Europe: GRETA carries out fourth evaluation visit to Croatia, available at: <https://www.coe.int/en/web/anti-human-trafficking/-/greta-carries-out-fourth-evaluation-visit-of-croatia>.

<sup>289</sup> GRETA: Evaluation report Croatia, 19 June 2025, available at: <https://rm.coe.int/greta-evaluation-report-on-the-implementation-of-the-council-of-europe/1680b66807>.



Protection, and especially in the Reception Centres for foreigners, is not adequate.<sup>290</sup> The problems regarding identification were also highlighted in 2024. The CPS further indicated that access to justice within the Reception Centres for Applicants for International Protection is at times delayed or obstructed, both due to a lack of information among applicants regarding the procedures for reporting criminal offences and misdemeanours, but also because of the reporting system within the Reception Centre. Applicants who are victims or potential victims of criminal offences are often not informed about the procedures for reporting such offences, nor about their rights as victims. Therefore, CPS recommends that clear public guidelines be made available to applicants on how to report criminal or misdemeanour offences committed in Croatia. It is also essential to ensure the protection and, in certain cases, the anonymity of victims —particularly in cases involving trafficking in human beings, hate crimes, sexual or domestic violence, and other particularly vulnerable groups of applicants.<sup>291</sup>

This issue was also raised by the UN Human Rights Committee in their latest conclusions on Croatia.<sup>292</sup> In particular, the UN Human Rights Committee recommended that *'the State party should strengthen its efforts to systematically identify, prevent and combat trafficking in persons, especially of those at heightened risk, such as children, in particular unaccompanied and separated children, members of the Roma minority, migrants, refugees and applicants for international protection. The State party should in particular:*

- (a) Enhance the screening of groups at heightened risk of trafficking in persons and the identification of potential victims, including through the systematic provision of training for border control personnel and staff working in facilities for applicants for international protection and refugees;*
- (b) Ensure that all cases of trafficking in persons are investigated thoroughly, that perpetrators, if convicted, receive adequate and deterrent punishment and that victims are informed, in a language that they understand, about and have access to effective remedies and assistance, including receiving compensation in criminal proceedings and rehabilitation and reintegration support services;*
- (c) Continue and expand training for lawyers, prosecutors and judges on trafficking in persons, victim's rights and victim-centred approaches;*
- (d) Continue and expand the implementation of awareness-raising campaigns on trafficking in persons for the general public, as well as targeted campaigns, such as for the tourism and business sectors.'*

In 2024, MDM-BELGIQUE continued to provide multidisciplinary and linguistically adapted care to applicants for international protection - especially in identifying and supporting the most vulnerable among them (i.e., women, children, minors, LGBTQ+ individuals, survivors of gender-based violence, human trafficking or torture, persons with disabilities, children with developmental difficulties and their families, single parents, etc.) in the Reception Centers for Applicants for International Protection in Croatia.<sup>293</sup>

The Croatian Red Cross (CRC) provides psychosocial and practical support and assistance to applicants for international protection in Reception Centres for Applicants for International Protection, based on the identified needs of individuals and families. CRC identifies vulnerable groups (i.e., children, unaccompanied minors, elderly persons, single women, persons with physical or mental health difficulties, individuals who have experienced trauma or torture, potential victims of trafficking in human beings, and victims of domestic violence) and plans work tailored to their specific needs. The greatest challenge in working with vulnerable applicants in 2024, as reported by CRC, was the exceptionally high influx of people who stayed in the reception centres for only a short period of time. This significantly hindered the identification of vulnerabilities and specific needs in non-obvious cases (e.g., persons with disabilities, women in advanced stages of pregnancy, single parents with children, etc.). During initial and individual interviews, the following were identified as particularly vulnerable groups: unaccompanied minors; parents with children who had

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<sup>290</sup> Information provided by Centre for Peace Studies, 30 January 2024.

<sup>291</sup> Information provided by Centre for Peace Studies, 27 February 2025.

<sup>292</sup> UN Human Rights Committee: Concluding observations on the fourth periodic report of Croatia, 11 September 2024, available at: [https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/Download.aspx?symbolNo=CCPR%2FC%2FHRV%2FCO%2F4&Lang=en](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolNo=CCPR%2FC%2FHRV%2FCO%2F4&Lang=en).

<sup>293</sup> Information provided by MDM-BELGIQUE, 17 February 2025.

been temporarily separated from the rest of their family; single parents and their children; persons with severe mental health difficulties (such as acute psychotic episodes, suicide attempts, etc.); persons with serious physical health conditions (e.g., cerebral palsy, limb amputations); pregnant women; survivors of torture; survivors of gender-based violence; single women; individuals with substance abuse problems; and those who had recently experienced traumatic events. Unaccompanied minors who arrived at the reception centres were provided with appropriate support, including accommodation in rooms with other minors. Through initial interviews, they regularly received all necessary information regarding family reunification, with the support of the CRC, and were referred to assistance and access to social rights and services such as healthcare, education, social welfare, and legal aid.<sup>294</sup>

In 2024, Are You Syrious reported that a great need for more systematic, sustainable and better psychosocial support for children had been observed. In particular, they noted that accumulated stress that these children experience and a great risk for development mental health difficulties require greater activation of the system in terms of protection of their mental health.<sup>295</sup>

During 2024, a total of 498 persons to whom special guarantees applied were accommodated outside the Reception Centres for Applicants for International Protection.<sup>296</sup>

In her 2024 report, the Ombudswoman for Children states that, according to data from the Ministry of the Interior for 2024, 1,455 unaccompanied children were accommodated in Reception Centres for applicants for international protection, and 487 in social welfare institutions. This is a significant increase compared to 2023, when 1,113 unaccompanied children were placed in Reception Centres and 374 in social welfare institutions.<sup>297</sup>

## Unaccompanied children

The Government adopted a Protocol on the treatment of unaccompanied children on 30 August 2018.<sup>298</sup> The protocol aims to improve the position of unaccompanied children, provides a detailed overview of all procedures and provides guidance for all relevant actors coming in contact and working with this category of children. The Protocol elaborates in 14 chapters on the various issues faced by unaccompanied children. According to the Ministry of Interior, an Interdepartmental Commission for the protection of unaccompanied children has been established. The Commission was established with the aim to improve inter-agency cooperation between state administration bodies and other stakeholders involved in the protection of unaccompanied children. The Commission is composed of representatives of the Ministry of Labour, Pension System, Family and Social Policy, the Ministry of the Interior, the Ministry of Science and Education, the Ministry of Health, the Office for Human Rights and Rights of National Minorities and international organisations dealing with the protection of the rights of the child or refugee rights and, institutions and civil society organisations engaged in humanitarian work, i.e., protection of children's rights. In 2024, the Croatian government started to revise the Protocol for unaccompanied children in light of the Pact on Migration and Asylum.<sup>299</sup>

In 2023, the implementing partner of the UNICEF Office for Croatia, Centre for Psychological Counselling, Education and Research- Sirius, printed posters and leaflets promoting the foster care of unaccompanied children. The poster and leaflets are in Croatian.<sup>300</sup>

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<sup>294</sup> Information provided by Croatian Red Cross, 20 January 2025.

<sup>295</sup> Information provided by Are You Syrious, 15 January 2025.

<sup>296</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).

<sup>297</sup> Ombudswoman for Children: *Report on the work of the Ombudswoman for Children in 2024*, available at: <https://dijete.hr/hr/download/izvjesce-o-rad-u-pravobraniteljice-za-djecu-za-2024-godinu/>.

<sup>298</sup> Protocol on the treatment of unaccompanied children, 30 August 2018, available in Croatian at: <https://bit.ly/2DEgBEu>.

<sup>299</sup> EUAA: National Asylum Developments 2025, page 22, available at: [https://euaa.europa.eu/sites/default/files/publications/2025-06/2025\\_National\\_Asylum\\_Developments\\_EN.pdf](https://euaa.europa.eu/sites/default/files/publications/2025-06/2025_National_Asylum_Developments_EN.pdf).

<sup>300</sup> Information provided by UNICEF, 4 February 2024.

A new<sup>301</sup> Interdepartmental Commission for the Protection of Unaccompanied Children was established by a decision of the Government of the Republic of Croatia on 5 January 2022.<sup>302</sup> The decision states that the goal of the Commission is to improve the interdepartmental cooperation of competent authorities and other stakeholders involved in the protection of unaccompanied children.

In 2022, the Croatian Government adopted a Decision on the appointment of a representatives of the Interdepartmental Commission for the Protection of Unaccompanied Children,<sup>303</sup> in accordance with the Protocol on the Treatment of Unaccompanied Children.

According to the Ombudswoman for Children, the Commission did not meet in 2024.<sup>304</sup>

According to the report of the Ombudswoman for Children, in 2024, 1,980 children expressed intention to apply for international protection. Unaccompanied children most often do not wait for a decision on their application for international protection to be issued, mainly because Croatia is a transit point on their journey.

The UNICEF Office for Croatia highlighted that cases continue to be reported of unaccompanied children found on the territory of Croatia who present themselves as adults, which results in their placement in the Reception Centers for applicants for international protection or the Reception Centers for Foreigners or Transit Reception Centers for foreigners in Tovarnik and Trilj. In addition to inadequate accommodation, an unaccompanied child presenting as an adult is not appointed a special guardian and remains unrecognised in the social welfare system. This puts unaccompanied children at risk and it is difficult to respond to their specific needs and exercise their rights. The UNICEF office for Croatia also reported that the monitoring of data on unaccompanied children in the Republic of Croatia continues to be a problem. Although the relevant ministries, primarily the Ministry of Interior and the Ministry of Labour, Pension System, Family and Social Policy, consistently maintain data on unaccompanied children through well-developed information systems, the data between State bodies are neither comparable nor harmonised primarily due to the absence of a unique identifier for unaccompanied children who have not been assigned a Personal Identification Number (OIB).<sup>305</sup>

In 2023, the National Action Plan (NAP) to implement the EU Council Recommendation on establishing a European Child Guarantee<sup>306</sup> was adopted.<sup>307</sup> The aim is to enable access to services for children at greatest risk of poverty and social exclusion in Croatia, and therefore children in need are in the focus of this NAP. The NAP is a comprehensive national document that forms the basis for the implementation of measures and activities in key areas of intervention arising from needs and development potentials related to combating child poverty and social exclusion, with an emphasis on cross-sectoral cooperation and joint action.

Six general objectives were defined in NAP: 1. Improved access to early childhood education and care; 2. Ensured access to education and support for children at risk of poverty and social exclusion; 3. Ensured access to quality meal nutrition for children at risk of poverty and social exclusion; 4. Ensured access to health services for children at risk of poverty and social exclusion; 5. Ensured access to adequate housing

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<sup>301</sup> The first Interdepartmental Commission for the protection of unaccompanied children was established in 2018.  
<sup>302</sup> Government of the Republic of Croatia, *Decision on the establishment of the Interdepartmental Commission for the Protection of Unaccompanied Children*, available in Official Gazette 3/2022 in Croatian at: <https://bit.ly/4eowL4h>.

<sup>303</sup> Decision on the appointment of the president, deputy president, secretary, members and deputy members of the Interdepartmental Commission for the Protection of Unaccompanied Children, Official Gazette 52/2022, available at: <http://bit.ly/3K4rMIX>.

<sup>304</sup> Ombudswoman for Children: *Report on the work of the Ombudswoman for Children in 2024*, page 205, available at: <https://dijete.hr/hr/download/izvjesce-o-radu-pravobraniteljice-za-djecu-za-2024-godinu/>.

<sup>305</sup> Information provided by UNICEF, 4 February 2024.

<sup>306</sup> National Action Plan to implement the EU Council Recommendation on establishing a European Child Guarantee, available in Croatian: <https://bit.ly/3VMMMtC> and in English: <https://bit.ly/3Xtolx3>.

<sup>307</sup> Decision on the adoption of the National Action Plan for the implementation of the recommendation of the Council of the European Union on the establishment of a European Child guarantee, Official Gazette 87/2023, available in Croatian at: <https://bit.ly/4esATQH>.

for children at risk of poverty and social exclusion; and 6. Improved accessibility of social services in the community to children at risk of poverty and social exclusion.

Children with a migrant background (unaccompanied children, children seeking international protection, applicants for international protection, foreigners under subsidiary and temporary protection who are under the age of 18) have been identified as children in need.

For information about the reception of unaccompanied children, see dedicated section [Reception of unaccompanied children](#).

## **Victims of sexual and gender-based violence**

In April 2021, a Standard Operational Procedure (SOP) in Cases of Sexual and Gender-Based Violence (SGBV) in the Reception Centres for Applicants of International Protection entered into force. The SOP was developed in cooperation with the Ministry of Interior, UNHCR, IOM, MDM-BELGIQUE, the Croatian Red Cross and the Croatian Law Centre. SOP contain procedures, roles, and responsibilities of service providers involved in the prevention and response to SGBV in the reception centres.

Since 2021, a standardised application form applies in the Reception Centres for reporting cases of sexual and gender-based violence as part of SOP.<sup>308</sup>

In 2022, UNHCR Croatia carried out capacity-building activities with key stakeholders dealing with refugees, more specifically through trainings on gender-based violence, protection from sexual exploitation and abuse (PSEA), the fight against human trafficking and communication with communities. The activities involved state and non-governmental employees, members of the Coordination group for sexual and gender-based violence, operators of the 112-emergency telephone line and the newly established telephone line run by UNHCR and partner Croatian Law Centre specifically for Ukrainian refugees. In addition to the above, numerous informative materials on the mentioned areas were created and their distribution ensured. Furthermore, UNHCR and the Council of Europe (CoE) organised an online event on the topic 'Preventing, combating and responding to gender-based violence in the context of asylum and migration', which gathered experts and key stakeholders of the system who encounter gender-based violence issues in their work.<sup>309</sup>

In 2022, the Governmental Office for Gender Equality, in cooperation with the Ministry of Interior and UNHCR, published a leaflet intended to inform victims of gender-based violence about available protection options and services. The leaflet is intended primarily for female migrants, refugees and applicants for international protection, although it acknowledges that gender-based violence can be committed against men, and is available in eight languages (Arabic, Croatian, English, Farsi, French, Kurdish, Turkish and Urdu).<sup>310</sup>

Officials of the Service for the reception and accommodation of applicants for international protection systematically monitor the needs of persons who have survived some form of violence and continuously improve their skills through education (identification of vulnerable groups, gender-based violence, etc.) They also exchange experiences at meetings of the Coordination Group for sexual and gender-based violence, and if necessary cooperate with the professional staff of the Croatian Institute for Social Work and keep records on the number, type of violence and specific characteristics of persons who have survived some kind of violence.<sup>311</sup>

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<sup>308</sup> Ombudsperson for Gender Equality, Report of the Ombudsperson for Gender Equality for 2023, available in Croatian at: <https://bit.ly/4cnY4Kn>, 242.

<sup>309</sup> Croatian Law Centre, *The Croatian Asylum System in 2022 - National Report*. The report was prepared as part of the project "Legal Assistance and Capacity Building for Access to Territory and Asylum in Croatia", with financial support of the UNHCR Croatia: available in English at: <https://bit.ly/434T7RL>.

<sup>310</sup> Office for Gender Equality: *The Office for Gender Equality published a leaflet for female migrants, refugees and asylum seekers*, available in Croatian at: <http://bit.ly/3FNHzte>.

<sup>311</sup> Ombudsperson for Gender Equality, Report of the Ombudsperson for Gender Equality for 2023, available in Croatian at: <https://bit.ly/4cnY4Kn>, 242.

The Ombudsperson for Gender Equality reported that, according to data provided by the Ministry of the Interior, in 2024 a total of 40 women and 25 men accommodated in the Reception Centres for Applicants for International Protection in Zagreb and Kutina reported being victims of gender-based violence. The Mol's records indicate that these individuals were subjected to multiple forms of violence. Specifically, 19 female applicants and 2 male applicants reported having experienced sexual violence; 19 female applicants and 16 male applicants were exposed to physical violence; and 31 female applicants and 19 male applicants were subjected to psychological violence. Furthermore, 5 female applicants and 1 male applicant were identified as having been exposed to harmful traditional practices, while 1 female applicant reported experiencing socio-economic violence. Additionally, 13 male applicants for international protection were identified as victims of torture in their country of origin, and 9 male applicants reported having been subjected to physical violence. All identified persons who survived some form of violence were referred to organisations that provide support in the Reception Centres (i.e., to the Croatian Red Cross and Médecins du Monde).<sup>312</sup>

### Victims of trauma and mental health issues

In May 2023, MdM issued its publication "*Physical and mental health of applicants for international protection in the Republic of Croatia - new trends, observations, challenges and recommendations*", developed with support of the European Union's Asylum, Migration and Integration Fund ('AMIF') and the Government of Croatia (Ministry of Health).<sup>313</sup>

In 2024, the Rehabilitation Centre for Stress and Trauma (RCT) provided direct assistance to victims of torture who experienced torture in their countries of origin.<sup>314</sup>

## 1.2. Age assessment of unaccompanied children

The LITP foresees the possibility of an age assessment procedure if, during the procedure for international protection, doubt arises regarding the age of an unaccompanied child.<sup>315</sup> The assessment of the child's age shall be conducted on the basis of the information available on the child, including the expert opinions of persons involved in work with the child. If the information available is insufficient, a medical examination shall be conducted, with the prior written consent of the child and the guardian. The medical examination shall be conducted by means of a physical examination, X-ray of the teeth and/or hands, with full respect for the dignity of the unaccompanied child. An unaccompanied child shall be informed in writing in a language which they may justifiably be presumed to understand and in which they are able to communicate about the manner of examination and its possible consequences for their health, the consequences of the results of the medical examination for their application, as well as the consequences of unjustified refusal. In the case of unjustified refusal of consent, the unaccompanied child shall be deemed to be an adult applicant. The application cannot be refused exclusively on the basis of the fact that consent to perform a medical examination was not given. During the medical examination, an unaccompanied child who does not understand Croatian shall be provided with a translator/interpreter for a language which they may justifiably be presumed to understand and in which they are able to communicate. The costs of the medical examination shall be borne by the Ministry. If, even following the results and report on the medical examination undertaken, there is still doubt regarding the age of the minor, the concept of benefit of the doubt shall be applied.

The LITP does not foresee the possibility to appeal against the outcome of age assessments. The Ministry of Interior has stressed that in case of doubt in the opinion of the doctor, new medical examinations would

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<sup>312</sup> Ombudswoman for Gender Equality, Report of the Ombudswoman for Gender Equality for 2024, page 262, available at: [https://www.prs.hr/application/uploads/izvjes%CC%8Cc%CC%81e\\_2024\\_CJELOVITO\\_FINAL\\_.pdf](https://www.prs.hr/application/uploads/izvjes%CC%8Cc%CC%81e_2024_CJELOVITO_FINAL_.pdf).

<sup>313</sup> MdM Publication *Physical and mental health of applicants for international protection in the Republic of Croatia - new trends, observations, challenges and recommendations* available in Croatian at: <https://bit.ly/42ZH8F2> and in English at: <https://bit.ly/43QN988>.

<sup>314</sup> Rehabilitation Centre for Stress and Trauma: Annual Report for 2024, February 2025, available at: <https://rctzg.hr/wp-content/uploads/2025/04/Godisnji-izvjestaj-o-radu-za-2024.godinu.pdf>.

<sup>315</sup> Article 18 LITP.



be initiated. The Ministry also emphasises that in such case, the concept of benefit of the doubt in favour of the minor shall be applied.<sup>316</sup>

In 2023, the Ministry of Interior decided to initiate the age assessment procedure for two children and two procedures of medical expertise were conducted and concluded that the applicants were adults.<sup>317</sup> No information is available for 2024.

In her 2024 report, the Ombudswoman for Children highlighted the age assessment of unaccompanied children as a particular challenge, due to the lack of documentation.<sup>318</sup> Cases continue to be reported in which unaccompanied children present themselves as adults, leading to their placement in reception centres for applicants for international protection or to reception centres for foreigners that are unsuitable for their age, thereby exposing them to increased risks. If police officers do not express doubt about the age of a child found while crossing the border, the individual is treated as an adult, no guardian is appointed, and the social welfare system responsible for their protection is not engaged.<sup>319</sup>

## 2. Special procedural guarantees

### Indicators: Special Procedural Guarantees

11. Are there special procedural arrangements/guarantees for vulnerable people?

☒ Yes ☐ For certain categories

☐ No

❖ If for certain categories, specify which:

### 2.1. Adequate support during the interview

The LITP regulates that the needs of an applicant who requires special procedural and reception guarantees shall be taken into account when rights established in the LITP are exercised.<sup>320</sup> The notion of “adequate support” is understood by the Ministry as meaning that vulnerability should be determined and that the rights related thereto are respected,<sup>321</sup> without however specifying what types of guarantees should be provided.

The Ministry of Interior does not have a special unit dealing with vulnerable groups but accommodates their needs in the general system and assesses their cases within the same legislative framework.

For example, in 2022, 13 employees of the Service for Reception and Accommodation attended various workshops with special emphasis on the vulnerable groups in need of special reception/procedural guarantees (e.g. unaccompanied children, GBV survivors). Workshops were organised by EUAA, UNHCR, Council of Europe, UNICEF, CRC, Frontex, Judicial Academy and State school for public administration.<sup>322</sup> While no detailed information on trainings in 2023 is available, the Ministry of Interior confirmed that officials of the Ministry of Interior who are trained to work with vulnerable groups are those who conduct the procedure for granting international protection. Continuous training of officials takes place through the EUUA curriculum and through the workshops organised by the Croatian Red Cross, UNHCR and Croatian Law Centre.<sup>323</sup>

In 2023, the training of Administrative court judges, financially supported by UNHCR, was held. The topic of the training was gender-based violence in the procedure of determining international protection status i.e., appropriate gender considerations in the procedure for international protection and strict appliance of

<sup>316</sup> Information provided by the Ministry of Interior, 2 March 2017.

<sup>317</sup> Information provided by the Ministry of Interior, 8 March 2024.

<sup>318</sup> This does not apply only to unaccompanied minors who are applicants for international protection.

<sup>319</sup> Ombudswoman for Children: *Report on the work of the Ombudswoman for Children in 2024*, page 205, available at: <https://dijete.hr/hr/download/izvjesce-o-radu-pravobraniteljice-za-djecu-za-2024-godinu/>.

<sup>320</sup> Article 52(2) LITP.

<sup>321</sup> Information provided by the Ministry of Interior, 21 July 2017.

<sup>322</sup> Croatian Law Centre, *The Croatian Asylum System in 2022 - National Report*. The report was prepared as part of the project “Legal Assistance and Capacity Building for Access to Territory and Asylum in Croatia”, with financial support of the UNHCR Croatia: available in English at: <https://bit.ly/434T7RL>.

<sup>323</sup> Information provided by the Ministry of Interior, 8 March 2024.



gender-sensitive procedures. Beside 9 judges and judicial advisors, 2 officials of the Ministry of Interior participated at the training.

In 2024, UNHCR organised a two-day training on refugee status determination for eighteen staff from the Ministry of Interior's Service for International Protection. The workshop covered effective interviewing techniques, with a special focus on working with applicants for international protection with specific needs, particularly children and survivors of trafficking and gender-based violence. Additionally, the training addressed credibility assessments and eligibility guidelines.<sup>324</sup>

There are few specific provisions on how to process and assess the cases of vulnerable applicants, and with a few exceptions (enumerated below) the same procedural guarantees are in place for vulnerable categories as for other applicants. There is a general obligation to take into consideration the individual situation and personal circumstances of the applicant,<sup>325</sup> in particular the acts of persecution or serious harm already undergone.<sup>326</sup> The Ministry of Interior may, with the consent of the applicant, organise a medical examination in order to determine the exposure to persecution or the risk of suffering serious harm in accordance with the act regulating the general administrative procedure. The costs of the medical examination shall be borne by the Ministry.<sup>327</sup>

The personal interview and decision-making mechanism is the same for all applicants, regardless of their vulnerability.

Through special procedural (and reception) guarantees, appropriate support shall be provided for applicants in relation to their personal circumstances, among other things their age, sex, sexual orientation, gender identity, disability, serious illness, mental disorder, or as a consequence of torture, rape or other serious forms of psychological, physical or sexual violence, for the purpose of exercising the rights and obligations referred to in the Law on International and Temporary Protection (LITP).<sup>328</sup> The provisions LITP related to border and accelerated procedures shall not apply to applicants who are in need of special procedural guarantees, especially victims of torture, rape, or another form of serious psychological, physical, or sexual violence, if it is not possible to provide the appropriate support.<sup>329</sup>

It could be concluded that, according to the LITP, vulnerable applicants have the following rights in the status determination procedure:

- ❖ the possibility to be interviewed by a decision-maker of the same sex;<sup>330</sup>
- ❖ to an interpreter of the same sex, if possible;<sup>331</sup>
- ❖ to be interviewed as soon as possible upon the submission of the application for international protection;<sup>332</sup>
- ❖ in cases where the interview is omitted,<sup>333</sup> in particular when an applicant is unfit or unable to be interviewed, owing to enduring circumstances beyond their control, their relatives shall be permitted to present evidence and give statements;<sup>334</sup>
- ❖ in case of an application of an unaccompanied child, the application has priority in decision-making (see section on [Regular Procedure: Fast-Track Processing](#)).<sup>335</sup>

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<sup>324</sup> Information provided by UNHCR, 18 March 2025.

<sup>325</sup> Article 28(2)(3) LITP.

<sup>326</sup> Article 28(3) LITP.

<sup>327</sup> Article 28(4) LITP.

<sup>328</sup> Article 15(1) LITP.

<sup>329</sup> Article 15 (3) LITP.

<sup>330</sup> Article 35(5) LITP.

<sup>331</sup> Article 14(3) LITP.

<sup>332</sup> Article 35 LITP.

<sup>333</sup> Article 35(8)(2) LITP.

<sup>334</sup> Article 35(9) LITP.

<sup>335</sup> Article 17(9) LITP.

## 2.2. Exemption from special procedures

According to the LITP, the **Accelerated Procedure** would not apply to applications lodged by an unaccompanied child except in cases when a subsequent application is admissible, when the child represents a risk for the national security or public order of the Republic of Croatia or when it is possible to apply the concept of safe country of origin.<sup>336</sup> According to the Ministry of Interior during 2023 applications lodged by unaccompanied children were not processed under the accelerated procedure.<sup>337</sup>

Procedures at border crossing points or in transit zones would not apply to applications lodged by an unaccompanied child.<sup>338</sup> However, as mentioned in **Border procedure (border and transit zones)**, no border procedure is in place in practice.

The LITP also prescribes that accelerated procedures and procedures at border crossings or in transit zones, shall not apply to applicants who are in need of special procedural guarantees, especially victims of torture, rape or another form of serious psychological, physical or sexual violence, if it is not possible to provide the appropriate support ("adequate support").<sup>339</sup>

## 3. Use of medical reports

### Indicators: Use of Medical Reports

1. Does the law provide for the possibility of a medical report in support of the applicant's statements regarding past persecution or serious harm?  
☒ Yes ☐ In some cases ☐ No
2. Are medical reports taken into account when assessing the credibility of the applicant's statements?  
☒ Yes ☐ No

Amendments to LITP in 2023 established the possibility to submit a medical report in the procedure. Previously, only the provisions of the Law on General Administrative Procedure regulated that possibility.<sup>340</sup> According to the amendments to LITP, the Ministry of Interior with the consent of the applicant for international protection may organise a medical examination in order to determine the exposure to persecution or the risk of suffering serious harm in accordance with the Law on the General Administrative Procedure, and the costs of the medical examination shall be borne by the Ministry of Interior. When the Ministry of Interior assesses that a medical examination is not necessary, the applicant must be informed in writing, or orally on the record if they are illiterate, that they can organise such an examination on their own initiative and at their own expense.<sup>341</sup>

The LITP also provide the possibility to use medical records in the age assessment procedure.<sup>342</sup>

## 4. Legal representation of unaccompanied children

### Indicators: Unaccompanied Children

1. Does the law provide for the appointment of a representative to all unaccompanied children?  
☒ Yes ☐ No

According to the LITP, "unaccompanied child" means a third-country national or a stateless person younger than eighteen years of age who entered the Republic of Croatia unaccompanied by an adult person responsible for them in the sense of parental care, pursuant to the law of the Republic of Croatia, until

<sup>336</sup> Article 17(10) LITP.

<sup>337</sup> Information provided by the Ministry of Interior, 8 March 2024.

<sup>338</sup> Article 17(11) LITP.

<sup>339</sup> Article 15(3) LITP.

<sup>340</sup> Article 58(1) Law on General Administrative Procedure.

<sup>341</sup> Article 28(4)-(5) LITP

<sup>342</sup> Article 18(2)-(8) LITP.

placed under the care of such a person, and includes all children who are left unaccompanied after they entered the Republic of Croatia.<sup>343</sup>

In 2024, 1,980 unaccompanied children expressed their intention to apply for international protection (i.e., made application). However, only 19 of them lodged an application for international protection, indicating high onwards movement.<sup>344</sup>

A special guardian should be appointed for each unaccompanied child, with the exception of married unaccompanied children over the age of 16.<sup>345</sup>

A child who has reached the age of fourteen may lodge an appeal against the decision of the Croatian Institute for Social Welfare regarding the appointment of a special guardian. The appeal is decided by the ministry responsible for social welfare.<sup>346</sup>

It is also possible to submit a complaint about the guardian's conduct to the Croatian Institute for Social Welfare.<sup>347</sup>

Complaints regarding violations of children's rights can also be submitted to the Ombudswoman for Children verbally, by phone or in person, as well as in written form.<sup>348</sup>

#### 4.1. Time of appointment

According to the LITP, the body responsible for social welfare shall immediately appoint a special guardian to an unaccompanied child who has expressed the intention to submit an application for international protection. The special guardian must be trained to work with children and should not have a conflict of interest with the child.<sup>349</sup>

According to the Protocol on Procedures for Unaccompanied and Separated Children, as soon as it is established that a child is unaccompanied or separated, the police officer must take actions to ensure the procedure of identification, which among others includes the obligation to invite a social worker from the competent regional office of Croatian Institute for Social work and an interpreter if the child does not understand Croatian, and to forward a letter to the competent regional office requesting a special guardian to be appointed.

The procedure of identification includes:

- ❖ Communication, introducing oneself and informing the child about the country of arrival, their guaranteed rights, the appointment of a special guardian, procedures that follow after the child's identification;
- ❖ Collecting personal data and other information about the child;
- ❖ Conducting an initial assessment of the child's needs by completing the form "Initial Assessment of Needs of Unaccompanied and Separated Children" in Annex 1 to the Protocol;
- ❖ Steps to be followed in the event of an expression of intention to submit an application for international protection during the identification procedure.

The procedure of identification is conducted by a police officer in the police administration or police station. An interpreter assigned by the Ministry of Interior, a social worker from the regional office of Croatian Institute for Social work and/or a special guardian also participate.

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<sup>343</sup> Article 4(1)(17) LITP.

<sup>344</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).

<sup>345</sup> Article 17 (3) LITP.

<sup>346</sup> Article 240 Family Law.

<sup>347</sup> Article 179 Family Law.

<sup>348</sup> Ombudswoman for Children: Complaints regarding violations of children's rights, available at: <https://dijete.hr/hr/prituzba-zbog-povrede-prava-djeteta/>.

<sup>349</sup> Article 17 (1) LITP.

Where the procedure of identification is conducted outside the regular working hours of the competent regional office of Croatian Institute for Social work, the expert duty officer of the regional office takes part in the procedure. They must appoint a special guardian, in an oral ruling, to protect the wellbeing of the child and to ensure the implementation of further procedures. If it is found out that the child already has a guardian, the official from regional office or the police officer will call the appointed guardian to take part in further procedures with the unaccompanied or separated child.

The child must be informed immediately about the appointment of the guardian. The procedure for international protection must be conducted by the official from the Ministry of Interior trained to work with children. The guardian has to prepare, on time, the unaccompanied child for the interview and provide them with information on the significance and consequences of the interview in a language which it may justifiably be assumed that the child understands and in which they are able to communicate. The costs of interpretation shall be borne by the Ministry of Interior.<sup>350</sup>

However, to the Croatian Law Centre's knowledge, this possibility is rarely used in practice as guardians are not using this legal right.

According to the Ministry of Labour, Pension, Family and Social Policy (MLPFSP), during 2024, the Croatian Institute for Social Work (CISW) Regional Offices appointed special guardians to 1,926 unaccompanied children. This data corresponds to the number of decisions on the appointment or dismissal of special guardians for unaccompanied and separated children made by CISW Regional Offices. The majority of guardian appointments were made to children from Syria (972), Egypt (399), Afghanistan (210) and Türkiye (209). In terms of age, 1,742 children (90%) were aged 14-17.<sup>351</sup>

In 2024, the Croatian Law Centre (CLC) implemented the project "Legal Assistance and Capacity Building for Access to Territory and Asylum in Croatia" with the financial support of the UNHCR. During the year, due to the short duration of children's stay and their rapid departure from accommodation facilities and consequently Croatia, unaccompanied minors were not provided with legal information or assistance, as it was not possible to organise counselling within the available timeframe.

## 4.2. Qualifications of guardians

As of the end of 2024, no special qualifications were required for the appointment of guardians.

According to the Law on Social Welfare, the previous centres for social welfare ceased to operate on December 31, 2022, and as of January 1, 2023, their duties were taken over by the Croatian Institute for Social Work.<sup>352</sup>

In practice, according to the information available to the Croatian Law Centre, usually employees of Croatian Institute for Social Work (CISW) are appointed as guardians. In some cases, employees of social welfare institutions where children are accommodated are also appointed as guardians as well as employees of the Croatian Red Cross.

The Croatian Red Cross (CRC) reported that unaccompanied children accommodated in social welfare institutions, as well as the staff of these institutions, receive support from CRC's staff. Unfortunately, CRC staff are often not informed whether a particular unaccompanied child has been placed in a social welfare institution. In 2024, CRC employees visited children's homes as needed and based on information received from the Ministry of Labour, Pension System, Family and Social Policy. The services provided included psychosocial support and the restoration of family links. However, the duration of stay of unaccompanied

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<sup>350</sup> Article 17 LITP.

<sup>351</sup> Article 17 (10) LITP.

<sup>351</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).

<sup>352</sup> Law on Social Welfare, Official Gazette 18/2022, 46/2022, 119/2022, 71/2023, 156/2023.

foreign minors was generally very short, and they would leave the Republic of Croatia shortly after their arrival.<sup>353</sup>

The [previous updates](#) of the AIDA report on Croatia provide background information on the different trainings and projects related to the unaccompanied children that were organised since 2016.

### 4.3. Capacity and performance of functions

Guardians of unaccompanied children were and still are generally appointed among the employees of the Croatian Institute for Social Work or among employees of social welfare institutions where children are accommodated.

According to the law, the best interests of children should be considered when implementing provisions of LITP.<sup>354</sup> The best interests of the child shall be assessed, taking into account:

- ❖ The welfare and social development of the child, and their origin;
- ❖ The protection and safety of the child, especially if the possibility exists that they are a victim of trafficking in human beings;
- ❖ The child's opinion, depending on their age and maturity; and
- ❖ The possibility of family reunification, etc.

The special guardian of the unaccompanied child shall undertake, as soon as possible after the application for international protection is submitted, all necessary actions to find the family members and reunite the child with the family, if that is in the child's interest, including contacting and cooperating with relevant ministries, other state and foreign bodies and NGOs. The special guardian is obliged to respect the principle of confidentiality when collecting, processing and exchanging information about the child and family members in order not to endanger their safety.

On the other hand, the LITP prescribes that a guardian shall not be appointed when an unaccompanied child is over 16 years of age and is married,<sup>355</sup> which can be understood that persons from the age of 16 have the capacity “to perform procedural acts” on their own behalf in procedures for international protection.

In her report for 2024, the Ombudswoman for Children reported that, although the amendments of the Law on International and Temporary Protection have strengthened the role of the special guardian in caring for unaccompanied children—stipulating that a special guardian shall be appointed immediately to any unaccompanied child expressing the intention to apply for international protection and who will, in the shortest possible time after the application is lodged, undertake all necessary actions to locate family members and enable family reunification—, the duties of special guardians remain extensive and complex, and difficulties arise in their practical implementation. Special guardians are most often appointed from the territorially competent social welfare offices of the Croatian Institute for Social Work (CISW). In 2024, a total of 1,957 decisions were issued appointing special guardians as legal representatives for unaccompanied minors, which is slightly more than in 2023 (1,884 decisions). Of these, 1,873 children were assigned professional staff members from the competent CISW office as their special guardians, while for the remaining children, relatives or other individuals were appointed.

The role of a special guardian involves a wide range of responsibilities: from ensuring the child's daily needs and access to healthcare, to representing the child before competent authorities in the process of obtaining international protection, accompanying them to the border, and undertaking actions related to family reunification. The complexity of tasks, the necessity to act outside of regular working hours —often at night— and the demanding nature of their primary duties contribute to their overload. Procedures are complex and require multiple steps and coordination with other services, including interviews with the unaccompanied child and the arrangement of appropriate accommodation. Special guardians sometimes face the challenge of individuals later arriving at the institution claiming to be related to the child, prompting

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<sup>353</sup> Information provided by the Croatian Red Cross, 20 January 2025.

<sup>354</sup> Article 10 LITP.

<sup>355</sup> Article 17(3) LITP.

the need to verify whether such individuals are eligible to act as guardians. The obligation to conduct numerous administrative procedures for a single child—who may end up remaining in Croatia for only one or two days—also contributes to their workload. Additionally, as the special guardian is initially appointed in the area where the child expressed intention to seek international protection, and is subsequently replaced by a new guardian based on the child's place of residence, this results in prolonged procedures and delays in informing the child of their rights. In many cases, the newly appointed guardian is assigned weeks after the child has already left the institution.<sup>356</sup>

The Centre for Missing and Exploited Children highlighted the lack of a unified data collection system regarding unaccompanied children; the overburdening of special guardians; the lack of regular training for special guardians; the need for professionalization of guardianship for unaccompanied children; the absence of a formal mechanism for monitoring and evaluating the work of guardians, as well as insufficient involvement of the unaccompanied children in the evaluation of their guardians' work; and the lack of a formalized system through which unaccompanied children can submit complaints and suggestions regarding the work of their guardians.<sup>357</sup>

## E. Subsequent applications

### Indicators: Subsequent Applications

1. Does the law provide for a specific procedure for subsequent applications? ☒ Yes ☐ No
2. Is a removal order suspended during the examination of a first subsequent application?
  - ❖ At first instance ☒ Yes ☐ No
  - ❖ At the appeal stage ☐ Yes ☒ No
3. Is a removal order suspended during the examination of a second, third, subsequent application?
  - ❖ At first instance ☐ Yes ☒ No
  - ❖ At the appeal stage ☐ Yes ☒ No

When the foreigner lodges a subsequent application, the authority competent to examine the application is the Department for international protection procedure of the Ministry of Interior, the same authority as in the regular procedure. The Department for international protection procedure examines the elements presented in the subsequent application in conjunction with the elements provided in the previous application and/or lawsuit.

The LITP provides a specific procedure for subsequent applications. A subsequent application for international protection is defined as the intention to apply for international protection expressed after an enforceable decision has been taken on the previous application, i.e., the previous application was rejected because the conditions were not met for asylum or subsidiary protection; or conditions were met for exclusion; or the application was rejected as manifestly unfounded as the applicant did not meet the conditions for asylum or subsidiary protection or the procedure was discontinued because the applicant withdrew the application.<sup>358</sup>

If a person decides to submit a subsequent application,<sup>359</sup> an explanation of the subsequent application should be submitted to the Reception Centre for Applicants of International Protection directly in writing or orally if the person is illiterate. The Ministry of Interior must decide on the subsequent application no later than within 15 days from the day of receiving it. This subsequent application must be comprehensible and contain the relevant facts and evidence that arose after the enforceability of the decision or that the applicant, for justified reasons, did not present during the previous procedure and which relate to establishing the conditions for granting international protection. The admissibility of the subsequent application should be assessed on the basis of the facts and evidence it contains, and in connection with the facts and evidence already used in the previous procedure. If it is established that the subsequent

<sup>356</sup> Ombudswoman for Children: *Report on the work of the Ombudsman for Children in 2024*, page 103, available at: <https://dijete.hr/hr/download/izvjesce-o-rad-u-pravobraniteljice-za-djecu-za-2024-godinu/>.

<sup>357</sup> Information provided by Centre for Missing and Exploited Children, 30 January 2025.

<sup>358</sup> Article 4(1)(13) LITP.

<sup>359</sup> Article 47 LITP.



application is admissible, a decision shall be issued once again on the substance of the application, and the previous decision revoked. The subsequent application should be dismissed if it is established that it is inadmissible. A subsequent application made by a foreigner under Dublin transfer shall be considered in the responsible Member State of the European Economic Area, but a subsequent application lodged in the Republic of Croatia shall be dismissed as inadmissible.

In practice under the LITP, the interview for lodging the subsequent application can be omitted when the admissibility of a subsequent application is being assessed.<sup>360</sup>

Under the LITP,<sup>361</sup> if the applicant lodges a subsequent application with the intention of postponing or preventing the enforcement of the decision on expulsion from the Republic of Croatia, they shall have the right of residence until the enforceability of the decision on the subsequent application. The LITP prescribes that the Ministry shall issue a decision to dismiss a subsequent application if it assesses that it is inadmissible,<sup>362</sup> and that, in such cases, lawsuit to the Administrative Court does not have automatic suspensive effect,<sup>363</sup> (which means that the decision of the Ministry is final).<sup>364</sup> Said provision means that the right to residence is applicable only during the first instance procedure. However, there is also a possibility for the lawsuit to contain a request for suspensive effect.<sup>365</sup> If the applicant presents the lawsuit which contains a request for suspensive effect, they shall have the right of residence until the delivery of the judgment on granting suspensive effect.<sup>366</sup>

However, applicants who lodge a new subsequent application after a decision has already been issued on a previous subsequent application do not have the right of residence in the Republic of Croatia.<sup>367</sup>

If the conditions for the accelerated procedure are met and the subsequent application is admissible, then the Ministry of Interior must issue its decision within a two-months period. The deadline for the lawsuit in that case is then eight days for the delivery of the first instance decision, however it does not have suspensive effect. Otherwise the 15-day time limit is applicable for the Ministry of Interior to decide on subsequent applications. As in the regular procedure, the Administrative Court is the competent authority for deciding upon a law suit. If the subsequent application is dismissed as inadmissible, the deadline is eight days from the delivery of the first instance decision and does not have suspensive effect.

In 2024, 37 applicants' applications for international application were dismissed on the basis of Article 43(2) of the LITP (i.e., the dismissal of a subsequent application determined not to contain any new relevant facts).<sup>368</sup>

## F. The safe country concepts

### Indicators: Safe Country Concepts

- |  |   |
|--|---|
| 1. Does national legislation allow for the use of "safe country of origin" concept?  | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| ❖ Is there a national list of safe countries of origin?                              | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| ❖ Is the safe country of origin concept used in practice?                            | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Does national legislation allow for the use of "safe third country" concept?      | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| ❖ Is the safe third country concept used in practice?                                | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Does national legislation allow for the use of "first country of asylum" concept? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

<sup>360</sup> Article 35(8)(3) LITP.

<sup>361</sup> Article 53(3)-(4) LITP.

<sup>362</sup> Article 43(2) LITP.

<sup>363</sup> Article 51(1)(3) LITP.

<sup>364</sup> Article 4(1)(21) LITP.

<sup>365</sup> Article 51(2) LITP.

<sup>366</sup> Article 53 LITP.

<sup>367</sup> Article 53 (4) LITP.

<sup>368</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).

In Croatia, safe country concepts started being applied in 2016 under the LITP. In 2016, a Decision on the list of safe countries of origin was adopted.

## 1. Safe country of origin

According to the LITP,<sup>369</sup> a country is considered as a safe country of origin where, on the basis of the legal situation, the application of the law and the general political circumstances, it can be shown that there is generally and consistently no persecution, or risk of suffering serious harm, as established on the basis of information on:

- (1) The relevant laws and legislation of the country and the manner in which they are applied;
- (2) Respecting the rights and freedoms guaranteed by the ECHR, especially Article 15(2) of the ECHR, the International Covenant for Civil and Political Rights and the United Nations Convention against Torture;
- (3) Respect for the principle of *non-refoulement*;
- (4) The provision of a system of effective remedies.

The information referred above shall be collected from various relevant sources, especially from other Member States of the European Economic Area, the EUAA, UNHCR, the Council of Europe and other relevant international organisations.

The Minister of Interior, with the prior consent of the Minister competent for foreign affairs, shall issue a decision to establish a list of safe countries of origin, and shall inform the European Commission. The Ministry of Interior shall regularly verify and as necessary revise the list of safe countries of origin, taking into account the abovementioned information, with the prior consent of the minister competent for foreign affairs, and shall inform the European Commission accordingly.

It shall be established for each application individually whether the conditions are met for the application of the concept of safe country of origin. A country included on the list of safe countries of origin may be considered a safe country of origin in a specific case only if the applicant:

- (1) Has the citizenship of that country or had their previous residence in that country as a stateless person; and
- (2) Has not explained in a credible manner why that country of origin cannot be deemed to be a safe country of origin for them.

The applicant shall be timely informed of the application of the concept of safe country of origin, in order to enable him/her to challenge its use in view of the specific nature of their personal circumstances.

An application shall be rejected in an accelerated procedure if it is possible to apply a safe country of origin concept (see section on [Accelerated Procedure](#)).<sup>370</sup> This is also applied to unaccompanied minors, who are generally exempted from accelerated procedures (see [Special Procedural Guarantees](#)).

In 2016, a Decision on the list of safe countries of origin in the procedure of granting international protection has been adopted.<sup>371</sup> The list includes 10 countries: Albania, Bosnia and Herzegovina, North Macedonia, Kosovo, Montenegro, Serbia, Morocco, Algeria, Tunisia and Türkiye.

According to information provided by the Ministry of Interior in 2023, the concept was not used for applicants from Türkiye.

In 2024, 7 applications for international protection were rejected as manifestly unfounded based on the 'safe country of origin' concept.<sup>372</sup>

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<sup>369</sup> Article 44 LITP.

<sup>370</sup> Article 41(1)(9) LITP.

<sup>371</sup> Official Gazette 45/2016, available in Croatian at: <http://bit.ly/2lcRePz>.

<sup>372</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).

## 2. Safe third country

The LITP defines safe third country as a country where the applicant is safe from persecution or the risk of suffering serious harm and where they are protected from *refoulement*, and the possibility exists to access an effective procedure to being granted protection, pursuant to the 1951 Convention.<sup>373</sup>

Whether the conditions have been met to apply the concept of safe third country is established separately for each application. This is done by assessing whether a country meets the abovementioned conditions and by assessing whether a connection exists between that country and the applicant, on the basis of which it may reasonably be expected that they could request international protection there, taking into account all the facts and circumstances of their application.

The applicant will be informed timely of the application of the safe third country concept, so that they are able to challenge it in view of the specific characteristics of their personal circumstances.

The Ministry of Interior shall issue an applicant whose application is dismissed a document in the language of the safe third country, informing the competent State bodies of that country that their application has not been examined in substance in the Republic of Croatia. If the safe third country refuses to accept the foreigner, a procedure would be conducted in Croatia, i.e., a decision shall be issued on the substance of the application pursuant to the provisions of LITP.

The Ministry has an obligation to regularly inform the European Commission about the countries to which the concept of safe third country has been applied. According to the Ministry of Interior, in 2023 the concept of safe third country was not applied.<sup>374</sup>

The LITP also provides a definition of the concept of safe European third country.<sup>375</sup> It defines the latter as a country that has ratified and applies the provisions of the 1951 Refugee Convention and the European Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR), including standards on effective remedy, and has established an effective procedure for the approval of protection pursuant to the 1951 Convention. It shall be determined whether the conditions have been met for the application of the concept of European safe third country for each application individually, assessing whether a country meets the above-mentioned conditions. The application of an applicant who entered Croatian territory unlawfully from a European safe third country shall be dismissed taking into account respect for the principle of *non-refoulement*, and the special circumstances of a humanitarian or political character, as well as the rules of international public law. The applicant must be informed in a timely manner of the application of the European safe third country concept, so that they are able to challenge it in view of their personal circumstances. If the Ministry of Interior dismisses the application of the European safe third country concept, it shall issue the applicant a document in the language of the European safe third country, informing the State bodies of that country that the application has not been examined in substance in Croatia. In addition, the Ministry of Interior must regularly inform the European Commission about the countries to which the concept of European safe third country has been applied.

## 3. First country of asylum

While the LITP does not define the concept of first country of asylum, an application may be dismissed as inadmissible where the applicant has been granted international protection or enjoys sufficient protection from *refoulement* in a third country.<sup>376</sup> In 2023, no decision was taken based on the concept of first country of asylum.<sup>377</sup> No information is available for 2024.

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<sup>373</sup> Article 45 LITP.

<sup>374</sup> Information provided by the Ministry of Interior, 8 March 2024.

<sup>375</sup> Article 46 LITP.

<sup>376</sup> Article 43(1)(2) LITP.

<sup>377</sup> Information provided by the Ministry of Interior, 8 March 2024.

## G. Information for asylum seekers and access to NGOs and UNHCR

### 1. Provision of information on the procedure

#### Indicators: Information and Access to NGOs and UNHCR

1. Is sufficient information provided to asylum seekers on the procedures, their rights and obligations in practice? ☐ Yes ☒ With difficulty ☐ No
- ❖ Is tailored information provided to unaccompanied children? ☐ Yes ☒ No

The LITP prescribes that the Ministry of Interior is obliged, within 15 days from the expression of the intention to apply for international protection, to inform an applicant in writing about the method of conducting procedure for international protection, about rights and obligations applicants are entitled to in the procedure, and about the possibility of communicating with representatives of the UNHCR and other organisations dealing with the protection of refugees' rights as well as on the possibility of receiving free legal aid.<sup>378</sup> If this information cannot be provided in writing for justified reasons or if the applicant is illiterate, the information shall be provided orally in a language reasonably supposed to be understood by the applicant and in which the applicant is able to communicate.<sup>379</sup> The same type of information is provided with the same modalities to applicants during all types of procedures. The only exception where this information should be given by police officers is when a third-country national or stateless person who wishes to express their intention is detained in a reception center for foreigners, at a border crossing or in the transit zone of an airport, seaport or inland water port. In that case, police officers shall provide all necessary information on the procedure for granting international protection in a language reasonably supposed to be understood by them and in which they are able to communicate.<sup>380</sup>

#### Official information on the procedure

At the beginning of the interview, the applicant is also informed about their duties in the procedure and during the interview. According to the Ministry of Interior, in general, information is provided during the process of lodging the application for international protection in the presence of interpreter and information is also given to the person in writing.<sup>381</sup> An information sheet, together with the rest of the documents (House Rules of the Reception Centre, information on Dublin procedure etc) is available in Albanian, Amharic, Arabic, Bengali, English, Farsi, French, Russian, Tigrinya, Turkish, Pashto and Urdu.<sup>382</sup> According to the Ministry of Interior, if information is not translated in a particular language, then it is translated from Croatian in the presence of an interpreter.

#### Information on the procedure from NGOs

NGOs also provide information on the asylum system. Some NGOs have issued leaflets and brochures which are also available in the Reception Centre for Applicants for International Protection, as well in Reception Centre for Foreigners. A leaflet that was prepared in cooperation of UNHCR, Croatian Law Centre and the Ministry of Interior has been updated in accordance with the LITP. The leaflet contains basic information on the procedure and the rights and obligations of the applicant during the procedure. The leaflets are available in both Reception Centre for Applicants for International Protection, in Arabic, English, Farsi, French, Kurdish Sorani, Pashto, Russian, Somali, Spanish, Tigrinya, Turkish, Ukrainian, and Urdu.<sup>383</sup>

During 2022, the Centre for Peace Studies (CPS) published on its website and printed leaflets on free legal aid. The leaflet is available in several languages: Arabic, Farsi, Urdu, Pashto, Somali, Turkish, Kurdish

<sup>378</sup> Article 59(2) LITP.

<sup>379</sup> Article 59(3) LITP.

<sup>380</sup> Article 59(1) LITP.

<sup>381</sup> Information provided by the Ministry of Interior, 28 January 2019.

<sup>382</sup> Information provided by the Ministry of Interior, 28 January 2019.

<sup>383</sup> Ministry of Interior, UNHCR, Croatian Law Centre: leaflets for applicants for international protection, available in English, French, Spanish, Turkish, Ukrainian, and Russian at: <https://www.hpc.hr/en/2024/08/30/information-for-people-seeking-international-protection-in-the-republic-of-croatia/> and in Urdu, Pashto, Arabic, Somali, Tigrinya, Farsi, and Kurdish Sorani at: <https://www.hpc.hr/en/2025/02/04/22553/>.

(Kurmanji), Tigrinya, Ukrainian, French, in Spanish, English and Croatian.<sup>384</sup> In addition, in 2022, CPS also translated the most frequently asked questions about the procedure for seeking international protection and the rights of applicants for and beneficiaries of international protection into Russian and French.

The Croatian Law Centre, within the project entitled “*Improving the protection of the rights of unaccompanied children*”, prepared a leaflet for unaccompanied children. Leaflets are recorded as mp3 format in Arabic, Croatian, English, Farsi and Pashto.<sup>385</sup>

In 2020, the Centre for cultural activities prepared 6 videos containing the necessary information for applicants for international protection and foreigners residing in Croatia, and one video contains information on legal counselling, accommodation and daily life.<sup>386</sup>

### 1.1. Information on Dublin

Applicants are informed about the Dublin procedure when expressing their intention to apply for international protection and also later on when lodging their application for international protection. They are provided with information explaining the purpose of the Dublin procedure as well as the purpose of taking fingerprints and of the Eurodac database. Also, information provided by Mol officials has clarified the procedure to be carried out if the applicant for international protection is an unaccompanied child. The above information is available in 8 language versions: Urdu, English, French, Arabic, Croatian, Somali, Farsi and Turkish.<sup>387</sup>

The decision on the transfer that applicants receive include the ground(s) for application of the Dublin Regulation, and also information on the fact that they can lodge a lawsuit/complaint before the Administrative Court within 8 days from the delivery of the decision. The Ministry of Interior does not provide a written translation of the Dublin decision, but they do explain it orally in a language that the applicant understands during the delivery of the decision itself.

No information is available on whether the common leaflet and the specific leaflet for unaccompanied children has been created in accordance with Article 4(3) of the Dublin III Regulation.

### 1.2. Information at the border

At some border crossing points, there is a lack of available interpreters. This prevents effective communication between foreigners (among whom some are potential applicants for international protection) and border officers. However, according to the LITP, third-country nationals or stateless persons who are detained in a reception centre for foreigners, at a border crossing or in a transit zone of an airport, sea port or inland water port and who wish to express their intention to apply for international protection shall be provided by police officers with all necessary information on the procedure for international in a language reasonably supposed that they understand it and in which they are able to communicate.<sup>388</sup>

In practice, persons may seek international protection at police stations at the border. Border guards have received training on how to recognise indications that a person wishes to seek protection. Interpretation at the border is also problematic. Problems regarding access to the territory and, therefore, to the asylum system which started at the end of 2016 still raises concerns (see [Access to the territory and pushbacks](#)), although a very significant increase in numbers of applicants for international protection was recorded in 2022 and 2023. Although high numbers of expressed intentions to apply for international protection were recorded in 2024 (26,776), they dropped down compared to 2023 (68,114).

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<sup>384</sup> Centre for Peace Studies, Leaflet on free legal aid, available at: <https://bit.ly/44cOcie>.

<sup>385</sup> Croatian Law Centre, ‘Information leaflet for unaccompanied children in audio format, 17 July 2017, available in Croatian at <https://bit.ly/2H9BpX3>.

<sup>386</sup> The video is available at: <https://bit.ly/32CTDJP>.

<sup>387</sup> Information provided by the Ministry of Interior, 28 January 2019.

<sup>388</sup> Article 59(1) LITP.

## 2. Access to NGOs and UNHCR

### Indicators: Access to NGOs and UNHCR

1. Do asylum seekers located at the border have effective access to NGOs and UNHCR if they wish so in practice? ☐ Yes ☒ With difficulty ☐ No
2. Do asylum seekers in detention centres have effective access to NGOs and UNHCR if they wish so in practice? ☐ Yes ☒ With difficulty ☐ No
3. Do asylum seekers accommodated in remote locations on the territory (excluding borders) have effective access to NGOs and UNHCR if they wish so in practice? ☒ Yes ☐ With difficulty ☐ No

UNHCR has access to all facilities where applicants are accommodated, namely the Reception Centres for Applicants for International Protection in **Zagreb** and **Kutina** and the Reception Centre for Foreigners in **Ježevo** and to Transit Reception Centres for Foreigners in **Trilj** and **Tovarnik**.

Since the end of March 2020 and the beginning of the COVID-19 pandemic, access for NGOs to Reception Centre for Applicants of International Protection has been restricted; this continued in 2024 and only the Croatian Red Cross (CRC) and MdM had daily access to the Reception centres.

The CRC staff is present on a daily basis in the Reception Centre for Applicants for International Protection and can refer applicants to the relevant organisations or institutions which can provide them with relevant information.

MdM staff is also present in the Reception Centre for Applicants for International Protection in Zagreb, and when needed in the Reception Centre for Applicants for International Protection in Kutina.

In 2024, legal aid related to international protection was provided to applicants via email, by telephone or in person (in the premises of organisations) by Borders none, Croatian Law Centre, Centre for Peace Studies, and Jesuit Refugee Service (JRS).

As part of the Coordination for Integration, an informal network of CSOs, the Center for Peace Studies organized a meeting with the Ministry of the Interior in November 2024. The topic of the meeting was the access of CSOs to the Reception Center for Applicants for International Protection in Zagreb. During the meeting, representatives of eight CSOs presented the reasons for requesting access to the Reception Center (i.e., in order to organize activities and provide support to applicants for international protection). The Ministry of the Interior agreed to consider the request and explore the possibilities of offering CSOs premises or alternative solutions to increase the visibility of their activities for applicants within the Reception Centre.<sup>389</sup>

## H. Differential treatment of specific nationalities in the procedure

### Indicators: Treatment of Specific Nationalities

1. Are applications from specific nationalities considered manifestly well-founded? ☐ Yes ☒ No
2. Are applications from specific nationalities considered manifestly unfounded?<sup>390</sup> ☐ Yes ☒ No

In Croatia, there are no official policies implemented with regard to nationals of particular countries, as every application is examined individually and on a case-by-case basis. However, in 2021 Croatia accepted evacuated Afghan nationals and their family members and granted them international protection. A total of 41 Afghan citizens were admitted from August to December 2021, three of whom left the Republic of Croatia

<sup>389</sup> Information provided by the Centre for Peace Studies, 27 February 2025.

<sup>390</sup> Whether under the “safe country of origin” concept or otherwise.



to reunite with their families, while the rest were granted asylum.<sup>391</sup> Out of that total number, 16 were children.<sup>392</sup>

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<sup>391</sup> Ombudsperson, *Annual report 2021*, available in Croatian at: <https://bit.ly/3v5TsVi>.

<sup>392</sup> Ombudsperson for Children: *Report on the work of the Ombudsman for Children in 2021*, available in Croatian: <https://bit.ly/3KzksTm>.

## Reception Conditions

### Short overview of the reception system

The Ministry of the Interior, or more precisely its Service for reception and accommodation of applicants for international protection, is responsible for the reception of applicants for international protection and runs two Reception Centres for applicants for international protection, which are situated in **Zagreb** and **Kutina**. The total reception capacity of these two centres is 900 places (600 in Zagreb and 300 in Kutina) as reported by the Ministry of the Interior in March 2024.<sup>393</sup>

A high number of applicants for international protection has been recorded in Croatia in 2024.

The Croatian Red Cross (CRC) reported that during 2024, a significant number of newly arrived applicants for international protection were accommodated in both reception centres. This situation required additional efforts and the full engagement of all CRC staff in reception and accommodation activities to ensure that all beneficiaries were provided with beds, hygiene kits, bedding packages, as well as clothing and footwear.

During this period, a large number of applicants stayed in the reception centres for only a few days, with some remaining less than 24 hours. As a result, there was no opportunity to involve them in the daily activities organised by the CRC, which are designed to make their stay in the centres more comfortable and meaningful. The CRC also reported that due to such short stays, it was not possible to conduct even initial interviews with the applicants to assess their needs and the psychological or physical condition they were in. Further challenges in the context of their work included applicants for international protection returned to Croatia under the Dublin procedure, as these people often refused to cooperate with the staff, declined participation in social activities, and expressed dissatisfaction with both the accommodation and their return to Croatia. A frequent issue among this group was the need for medical assistance upon arrival, including cases of individuals who had undergone surgery shortly before their return, mothers with newborns, or persons with chronic illnesses requiring medication and ongoing treatment.<sup>394</sup>

As a result of applicant's complaints about inadequate conditions of accommodation in the Reception Centre, in accordance with the Ombudsman's mandate, three inspections of Reception Centres for Applicants for International Protection were carried out by employees of Ombudsperson's office in 2023. *i.e.*, in Zagreb in June and September, and in Kutina in October 2023. In its 2023 annual report, the Ombudsperson reported about the inadequate conditions in Reception Centres at the time of visits (for example, accommodation on mattresses in the hallway; insufficient number of toilet spaces compared to the number of people being accommodated; dirty common premises due to overcapacity, lack of staff for maintenance, cleaning and laundry, etc).<sup>395</sup> In 2024, the Ombudswoman continued the investigation procedure initiated in 2023 concerning the complaint of an applicant for international protection in regard to the inadequate living conditions at the Reception Centre for Applicants for International Protection in Zagreb. Although in 2024 the reception capacities were not as strained as in the previous year due to a lower number of applicants, complaints regarding accommodation conditions continued to be received by the Ombudswoman. One applicant complained that, after thoroughly cleaning and repainting the walls of his room at the Reception Centre, he was – for reasons unknown to him – moved to another room infested with bedbugs. Another applicant expressed concern over being placed, as a Ukrainian national, in a room with nationals of the Russian Federation. Procedures initiated on the basis of these complaints resulted in the resolution of individual cases. However, in her 2024 report, the Ombudswoman emphasized the need for a systemic approach to addressing exposure to hygiene, health, and safety risks. She also stressed the importance of taking into account the gender and age characteristics of applicants, their vulnerabilities, and the implementation of measures to prevent violence, gender-based violence, and harassment.<sup>396</sup>

<sup>393</sup> Information provided by the Ministry of Interior, 8 March 2024.

<sup>394</sup> Information provided by Croatian Red Cross, 20 January 2025.

<sup>395</sup> Ombudswoman: Report of the Ombudswoman for 2023, available in Croatian at: <https://bit.ly/4crt2kR>.

<sup>396</sup> Ombudswoman: Report of the Ombudswoman for 2024, page 271, available in Croatian at: <https://www.ombudsman.hr/wp-content/uploads/2025/05/lzvjesce-pucke-pravobraniteljice-za-2024.-godinu-2.pdf>.

During 2023, the Directorate for European Affairs, International Relations and Funds of the European Union of the Ministry of Interior made two decisions on the allocation of additional financial resources for the implementation of the project aimed at maintaining an adequate level of accommodation in Reception Centres for Applicants for International Protection.<sup>397</sup> In 2024, a Decision was made on the direct allocation of financial resources for the implementation of the project "*Providing support for reception and accommodation conditions and security of applicants for international protection - SERVICE AND SECURITY (SAS)*" within the AMIF framework. The purpose of the project is to support the financing of costs related to the reception and accommodation of applicants for international protection and the maintenance and repair of infrastructure in reception centres for applicants for international protection.<sup>398</sup>

In addition, a Decision was also made on the direct allocation of financial resources for the implementation of the project "*Providing food for applicants for international protection accommodated in Reception Centres for applicants for international protection*". The purpose of the project is to improve the conditions of reception and accommodation of applicants for international protection by financing costs in Reception Centres for applicants for international protection.<sup>399</sup>

Applicants for international protection have the right to accommodation from the day of expressing the intention to apply for international protection until the enforceability of the decision on their application, if they do not have an adequate standard of living.<sup>400</sup>

## A. Access and forms of reception conditions

### 1. Criteria and restrictions to access reception conditions

#### Indicators: Criteria and Restrictions to Reception Conditions

1. Does the law allow access to material reception conditions for asylum applicants in the following stages of the asylum procedure?
 

❖ Regular procedure	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Reduced material conditions	<input type="checkbox"/> No
❖ Dublin procedure	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Reduced material conditions	<input type="checkbox"/> No
❖ Admissibility procedure	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Reduced material conditions	<input type="checkbox"/> No
❖ Border procedure	<input type="checkbox"/> Yes	<input type="checkbox"/> Reduced material conditions	<input type="checkbox"/> No
❖ Accelerated procedure	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Reduced material conditions	<input type="checkbox"/> No
❖ First appeal	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Reduced material conditions	<input type="checkbox"/> No
❖ Onward appeal	<input type="checkbox"/> Yes	<input type="checkbox"/> Reduced material conditions	<input checked="" type="checkbox"/> No
❖ Subsequent application	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Reduced material conditions	<input type="checkbox"/> No
2. Is there a requirement in the law that only asylum applicants who lack resources are entitled to material reception conditions?
 

	<input checked="" type="checkbox"/> Yes		<input type="checkbox"/> No
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According to the LTP, all applicants do not have the same access to reception conditions, so for example material conditions may be restricted during the subsequent application procedure.

According to the LTP, applicants are entitled to accommodation at the Reception Centres for Applicants for International Protection, but if they want, they are allowed to stay at any address in Croatia, subject to prior approval by the Ministry of Interior, at their own cost.<sup>401</sup> According to the Ordinances on the Realisation

<sup>397</sup> Ministry of Interior, decisions available in Croatian at: <https://bit.ly/3VMQI2Y>.

<sup>398</sup> Ministry of the Interior: Decision on the direct allocation of financial resources for the implementation of the project "Providing support for reception and accommodation conditions and security of applicants for international protection - SERVICE AND SECURITY (SAS)", 30 October 2024, available at: <https://eufondovi.mup.hr/UserDocImages/dokumenti/Odluka%20o%20dodjeli%20financijskih%20sredstava/Odluka%20SAS%204%2011%202024.pdf?vel=926835>.

<sup>399</sup> Ministry of the Interior: Decision on the direct allocation of financial resources for the implementation of the project "Providing food for applicants for international protection accommodated in Reception Centres for applicants for international protection", 26 August 2024, available at: <https://eufondovi.mup.hr/UserDocImages/dokumenti/Odluka%20o%20dodjeli%20financijskih%20sredstava/16.%20Odluka%20Osiguranje%20prehrane%20za%20tmz.pdf?vel=862678>.

<sup>400</sup> Article 7(1) Ordinance on the realisation of material reception conditions.

<sup>401</sup> Article 55(4) LTP.

of Material Reception Conditions, they are entitled to accommodation in the Reception Centre from the moment they express the intention to lodge an application for international protection.<sup>402</sup>

The right to material reception conditions (including financial aid) is granted to an applicant who is entitled to reside in the Republic of Croatia and does not have an adequate standard of living secured.<sup>403</sup> If an applicant for international protection, at their own request, does not reside in the Reception Centre for Applicants for International Protection or in accommodation provided by the Ministry of the Interior, but is instead accommodated by a private individual, it is considered that the applicant has an adequate standard of living secured.<sup>404</sup>

The rules of stay in the Reception Centre for Applicants for International Protection are determined by the House Rules. The applicant may stay outside the Reception Center for longer than 24 hours with the prior approval of the Reception Centre. If, based on an individual assessment the approval is denied, the Reception Center shall issue a decision. A lawsuit against the decision can be submitted to the administrative court within eight days from the date of delivery of the decision.<sup>405</sup>

During the examination of the Dublin procedure, applicants are entitled to a place in the Reception Centres, as well as to all other material rights as prescribed by the LITP.

According to the Ordinance on the Realisation of Material Reception Conditions, applicants are entitled to financial support from the day when they were accommodated in the Reception Centre,<sup>406</sup> either if they do not have possession of great value or if they do not have secured funds for personal use on a monthly basis amounting to more than 20% of minimum amount for social welfare support.<sup>407</sup>

The applicant is entitled to financial support if they have stayed in the Reception Centre Centres for Applicants for International Protection for at least 25 continuous days in the month for which the financial support is paid.<sup>408</sup> The only exception from this rule in relation to continuous accommodation is the situation when the person has been admitted in the hospital for treatment or if they have requested to be absent from the Centre and that the request has been approved.<sup>409</sup>

In practice, the assessment of whether or not someone possesses sufficient financial means is determined based on the statement of the applicant about their financial status which is taken when they lodges application for international protection.<sup>410</sup> The Reception centre where the applicant is accommodated confirms to the applicant their right to financial assistance and issues a certificate on the right to financial assistance.<sup>411</sup>

It is not prescribed in legislation that material reception conditions are tied to the issuance of a document by the relevant authorities. However, according to the Ordinance on the Realisation of Material Reception Conditions, an applicant who is accommodated in the Reception Centre will be issued an accommodation certificate that contains information, amongst others, on the date of expression of intention to apply for international protection as well as the date from which the person is accommodated in the Reception Centre.<sup>412</sup> In addition, applicants will be given an card of an applicant for international protection (applicant's card) which shall be issued within issued days from the day of lodging the application and it shall serve as a residence permit in the Republic of Croatia. The applicant's card is not proof of identity.<sup>413</sup>

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<sup>402</sup> Article 7(1) Ordinance on the Realisation of Material Reception Conditions.

<sup>403</sup> Article 3 (1) Ordinance on the Realisation of Material Reception Conditions.

<sup>404</sup> Article 3 (5) Ordinance on the Realisation of Material Reception Conditions.

<sup>405</sup> Article 56 (7)-( 9) LITP.

<sup>406</sup> Article 23(2) Ordinance on the Realisation of Material Reception Conditions.

<sup>407</sup> Article 23(1) Ordinance on the Realisation of Material Reception Conditions.

<sup>408</sup> Article 24(2) Ordinance on the Realisation of Material Reception Conditions.

<sup>409</sup> Article 24(3) Ordinance on the Realisation of Material Reception Conditions.

<sup>410</sup> Article 3(7) Ordinance on the Realisation of Material Reception Conditions.

<sup>411</sup> Article 25 (1) (2) Ordinance on the Realisation of Material Reception Conditions.

<sup>412</sup> Article 7(6) Ordinance on the Realisation of Material Reception Conditions.

<sup>413</sup> Article 62(1) LITP.

Applicants who are detained in the Reception Centre for Foreigners are not allowed financial support. The Ordinance on the Realisation of Material Reception Conditions prescribes that only those applicants who have not secured adequate standard of living have a right to material reception conditions,<sup>414</sup> and accommodation in the Reception Centre for Foreigners should be considered as an adequate standard of living.<sup>415</sup> If the applicant, following their own request, does not stay in the Reception Centre for Applicants for International Protection or in an accommodation provided by the Ministry of Interior and is accommodated with a private person, they are considered to have an adequate standard of living.<sup>416</sup>

## 2. Forms and levels of material reception conditions

### Indicators: Forms and Levels of Material Reception Conditions

1. Amount of the monthly financial allowance/vouchers granted to asylum applicants as of 31 December 2024 (in original currency and in €): €20

According to the LITP, material reception conditions are: accommodation in the Reception Centre for Applicants for International Protection, food and clothing provided in kind, remuneration of the cost of public transport for the purpose of the procedure for the granting of international protection, and financial aid.<sup>417</sup> The methods and conditions for the provision of material reception conditions shall be established by the Ministry of Interior, while the Reception Centre shall decide on the right to financial assistance.<sup>418</sup> The amount of financial assistance should be established by the decision of the Minister of Interior.<sup>419</sup>

The Decision on the Amount of Financial Assistance for Applicants for International Protection prescribes that the amount of support is 20 EUR per month. Monthly financial support to applicants is low and can serve only as pocket money. Since mid-2016, applicants in Zagreb may use public transport free of charge.

The system granting material reception conditions to applicants is separate and less favourable than the general welfare system for nationals.

## 3. Reduction or withdrawal of reception conditions

### Indicators: Reduction or Withdrawal of Reception Conditions

1. Does the law provide for the possibility to reduce material reception conditions?  
☒ Yes ☐ No
2. Does the legislation provide for the possibility to withdraw material reception conditions?  
☒ Yes ☐ No

Material reception conditions may be restricted or denied if the applicant:

- (1) Does not reside in the Reception Centre for Applicants for International Protection in which accommodation has been provided to them;
- (2) Stays outside the Reception Centre for Applicants for International Protection contrary to the conditions referred in the LITP, i.e., stays for longer than 24 hours without the prior consent of the Reception Centre;
- (3) Possesses means which provide them with an appropriate standard of living; or
- (4) Violates the provisions of the house rules of the Reception Centre for Applicants for International Protection.<sup>420</sup>

On the basis of a case-by-case assessment, the Reception Centre for Applicants for International Protection shall issue a decision to restrict or deny some of the material reception conditions, which is proportionate to the aim pursued, taking into account the needs of applicants who require special procedural and/or reception guarantees and maintaining the dignity of the standard of living of the applicant. If the

<sup>414</sup> Article 3(1) Ordinance on the Realisation of Material Reception Conditions.

<sup>415</sup> Article 3(4) Ordinance on the Realisation of Material Reception Conditions.

<sup>416</sup> Article 3(5) Ordinance on the Realisation of Material Reception Conditions.

<sup>417</sup> Article 55(1) LITP and Article 1(2) Ordinance on the Realisation of Material Reception Conditions.

<sup>418</sup> Article 55(2) LITP.

<sup>419</sup> Article 55(3) LITP.

<sup>420</sup> Article 55(5) LITP and Article 4(1) Ordinance on the Realisation of Material Reception Conditions.

circumstances referred under abovementioned points (1) and (2) cease to exist, the Reception Centre has to issue a decision to revoke the decision entirely or partially. The lawsuit may be brought before the Administrative Court within eight days from the delivery of the decision. The Ministry of Interior has the right to request repayment of the costs of accommodation, including material damage incurred, in the cases prescribed in above mentioned points (3) and (4).<sup>421</sup>

According to the Ministry of Interior no decisions on reduction or withdrawal of reception conditions were issued in 2023.<sup>422</sup> No data is available for 2024.

#### 4. Freedom of movement

##### Indicators: Freedom of Movement

1. Is there a mechanism for the dispersal of applicants across the territory of the country? ☐ Yes ☒ No
2. Does the law provide for restrictions on freedom of movement? ☒ Yes ☐ No

Applicants who are not detained can freely move within the country, and generally no restrictions are applied with regard to the area of residence. In fact, applicants are allowed to stay – at their own cost – at any address in Croatia, subject to prior approval by the Ministry of Interior. According to the Ordinance on the Realisation of Material Reception Conditions, in order to stay at some other address, the applicant must provide a notarised copy of the rental agreement or a notarised statement of the owner of the apartment stating that they accept to accommodate the applicant and would provide them with the adequate standard of living, or a title deed if the applicant is the owner of the property in which he intends to reside, or a hotel reservation if the applicant is located in a hotel.<sup>423</sup>

For those applicants who are accommodated in the Reception Centres for Applicants for International Protection, there is an obligation to inform the Head of the centre if they want to stay out for one or more nights, as they have to return to the centre by 23:00. According to the Ordinance on the Realisation of Material Reception Conditions, an applicant may stay outside the Centre for more than 24 hours with the prior approval of the Reception Centre and for a maximum of 15 days. In this case, and except in certain cases such as lack of capacity and occupancy of accommodation facilities, the allocated room will remain reserved. For any stay longer than 15 days, the applicant must submit the appropriate documents and register their residence at a new address.<sup>424</sup>

There are only two reception centres for applicants in Croatia. Therefore, in the past, transfers of applicants were possible from one centre to the other centre due to capacity / bed management issues or where special needs would arise. However, since the Reception Centre in **Kutina** was renovated and reopened in June 2014, it was decided that this centre would be primarily used for the accommodation of vulnerable groups.

The LITP foresees restrictions on freedom of movement as [Alternatives to Detention](#). The LITP specifies that the freedom of movement may be restricted by the 4 alternative measures or by detention.<sup>425</sup>

- (1) Prohibition of movement outside the Reception Centre for Applicants for International Protection;
- (2) Prohibition of movement outside a specific area;
- (3) Appearance in person at the Reception Centre for Applicants for International Protection at a specific time;
- (4) Handing over travel documents or tickets for deposit at the Reception Centre for Applicants for International Protection; or
- (5) Accommodation (i.e., detention) in the Reception Centre for Foreigners.

<sup>421</sup> Article 55(6)-(9) LITP.

<sup>422</sup> Information provided by the Ministry of Interior, 8 March 2024.

<sup>423</sup> Article 10(2) Ordinance on the Realisation of Material Reception Conditions.

<sup>424</sup> Article 17(1) Ordinance on the Realisation of Material Reception Conditions.

<sup>425</sup> Article 54(5) LITP.



The LITP lists 7 grounds for restricting freedom of movement (which are also grounds for detention).<sup>426</sup> The freedom of movement of an applicant may be restricted if, on the basis of all the facts and circumstances of the specific case, it is estimated that it is needed for the purpose of:

1. establishing the facts and circumstances on which the application for international protection is based, and that cannot be established without the restriction of movement, especially if it is assessed that there is a risk of absconding;
2. establishing and verifying identity or nationality;
3. protection of the national security or public order of the Republic of Croatia;
4. in order to prevent the spread of infectious diseases in accordance with national regulations on necessary epidemiological measures;
5. to prevent endangering the life of persons and property;
6. due to multiple consecutive attempts to leave the Republic of Croatia during the procedure for international protection;
7. due to the implementation of the procedure for forced removal, if based on objective circumstances, taking into account that the applicant already had the possibility of starting the procedure for international protection, it is justifiably assumed that by seeking international protection applicant wants to delay or make difficult to execute the decision on expulsion and/or return made in accordance with the provisions of the Law on foreigners.

For detention under the same grounds, see the chapter on [Detention of Asylum Applicants](#).

## B. Housing

### 1. Types of accommodation

#### Indicators: Types of Accommodation

1. Number of reception centres: 2
2. Total number of places in the reception system: 900
3. Total number of places in private accommodation: n/a<sup>427</sup>
4. Type of accommodation most frequently used in a regular procedure:  
☒ Reception centre ☐ Hotel or hostel ☐ Emergency shelter ☐ Private housing ☐ Other
5. Type of accommodation most frequently used in an accelerated procedure:  
☒ Reception centre ☐ Hotel or hostel ☐ Emergency shelter ☐ Private housing ☐ Other

In Croatia there are two Reception Centres for Applicants of International Protection:

Capacity and occupancy of Reception Centres for Asylum Applicants: 2024				
Centre	Location	Maximum capacity	Occupancy at the end of December 2023	Occupancy at the end of December 2024
Hotel Porin	City of Zagreb	600	471	N/A
Kutina	80km from Zagreb	300	80	N/A
<b>Total</b>		<b>900</b>	<b>551</b>	N/A

In 2019, the renovation of the Reception Centre in **Zagreb** was finalised. The Croatian Red Cross assessed that living conditions greatly improved thanks to renovation.<sup>428</sup> In 2022, the Reception Centre in Kutina was

<sup>426</sup> Article 54(2) LITP.

<sup>427</sup> In Croatia, private accommodation is not provided by state to applicants for international protection. However, applicants are allowed to stay – at their own cost – at any address in Croatia, subject to prior approval by the Ministry of Interior.

<sup>428</sup> Information provided by Croatian Red Cross, 20 December 2019.

closed due to the renovation of the facility. The renovation was realised as part of the project "Renovation of the Reception Centre for Applicants for International Protection in Kutina" that was implemented from January 2020 to September 2022. The implementation of the project improved the conditions of accommodation and stay of applicants in the Reception Centre, as well as the working conditions of officials and other personnel.<sup>429</sup>

As a result of the project, the accommodation capacity of the Reception Centre in Kutina increased by 40 places (from 100 to 140). In addition, within the framework of the AMIF fund, three more projects were implemented in the course of 2022, with the purpose of improving the reception and accommodation conditions for the applicants for international protection.<sup>430</sup>

According to the information provided by the Ministry of Interior, in 2023, capacity of the Reception Centre in Kutina was 300.<sup>431</sup> No information is available for 2024.

Both reception centres are managed directly by the Ministry of Interior. The centre in **Kutina** is designated for the accommodation of vulnerable applicants.

The Croatian Red Cross reported that in 2024, a total of 16,349 applicants for international protection were accommodated in Reception Centres for Applicants for International Protection: 6,229 at the Reception Centre in Kutina and 10,120 at the Reception Centre in Zagreb.<sup>432</sup>

In January 2021, the Directorate for European Affairs, International Relations and European Union Funds of the Ministry of the Interior adopted a decision on the allocation of AMIF funds for the project "Procurement of equipment for needs of Mol's Service for reception and accommodation of applicants for international protection and Service for international protection- NOP2". The purpose of the project is to equip reception centres in accordance with the best European practice to improve the quality of life of applicants as well as the working conditions for State officials.<sup>433</sup> In April 2021, the decision on the allocation of AMIF funds for the project "Increase of accommodation capacity of the Reception Centre for applicants for international protection in Zagreb" was adopted.<sup>434</sup>

During 2023, the Directorate for European Affairs, International Relations and Funds of the European Union of the Ministry of Interior made two decisions on the allocation of additional financial resources (75% from national AMIF, 25% from state budget) for the implementation of the project aimed at maintaining an adequate level of accommodation in Reception Centres for Applicants for International Protection.<sup>435</sup>

As noted above, in 2024, a Decision was made on the direct allocation of financial resources for the implementation of the project "*Providing support for reception and accommodation conditions and security of applicants for international protection - SERVICE AND SECURITY (SAS)*" within the AMIF framework. The purpose of the project is to support the financing of costs related to the reception and accommodation of applicants for international protection and the maintenance and repair of infrastructure in reception

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<sup>429</sup> Ministry of Interior, *Successful completion of the project "Renovation of the Reception Centre for Applicants for International Protection in Kutina"*, available at: <https://bit.ly/3MEvOYC>.

<sup>430</sup> Croatian Law Centre, *The Croatian Asylum System in 2022 - National Report*. The report was prepared as part of the project "Legal Assistance and Capacity Building for Access to Territory and Asylum in Croatia", with financial support of the UNHCR Croatia: available in English at: <https://bit.ly/434T7RL>.

<sup>431</sup> Information provided by the Ministry of Interior, 8 March 2024.

<sup>432</sup> Croatian Red Cross: Annual report on the work of the Croatian Red Cross in 2024, page 84, available at: [https://www.hck.hr/UserDocImages/vijesti/2025/AD%205\)%20Izvje%C5%A1%C4%87e%20o%20radu%20HCK%20u%202024.pdf?vel=5096156](https://www.hck.hr/UserDocImages/vijesti/2025/AD%205)%20Izvje%C5%A1%C4%87e%20o%20radu%20HCK%20u%202024.pdf?vel=5096156).

<sup>433</sup> Ministry of Interior, Decision on the allocation of AMIF funds for the project "Procurement of equipment for needs of Mol's Service for reception and accommodation of applicants for international protection and Service for international protection- NOP2", available in Croatian: <https://bit.ly/3hlqzli>.

<sup>434</sup> Ministry of Interior, Decision on the allocation of AMIF funds for the project "Increase of accommodation capacity of the Reception Centre for applicants for international protection in Zagreb", available in Croatian: <https://bit.ly/3vL8AJm>.

<sup>435</sup> Ministry of Interior, Decisions on the allocation of additional financial resources for the implementation of the project aimed at maintaining an adequate level of accommodation in Reception Centres for Applicants for International Protection, available in Croatian at: <https://bit.ly/3VMQI2Y>.

centres for applicants for international protection.<sup>436</sup> In addition, a Decision was also made on the direct allocation of financial resources for the implementation of the project *"Providing food for applicants for international protection accommodated in Reception Centres for applicants for international protection"*. The purpose of the project is to improve the conditions of reception and accommodation of applicants for international protection by financing costs in Reception Centres for applicants for international protection.<sup>437</sup>

## 2. Conditions in reception facilities

### Indicators: Conditions in Reception Facilities

1. Are there instances of asylum applicants not having access to accommodation because of a shortage of places? ☒ Yes<sup>438</sup> ☐ No
2. What is the average length of stay of asylum applicants in the reception centres?  
Less than 3 days, while majority left the Reception Centre within 24 hours from the arrival<sup>439</sup>
3. Are unaccompanied children ever accommodated with adults in practice? ☐ Yes ☒ No
4. Are single women and men accommodated separately? ☒ Yes ☐ No

Accommodation of applicants is organised in the two reception centres for applicants for international protection, one in **Zagreb** and the other in **Kutina**.

Although in 2024, due to the smaller number of applicants, the reception capacities were not as burdened as they had been the year before, complaints about accommodation conditions continued in 2024.

During 2024, applicants for international protection accommodated in Reception Centers reported to civil society organizations inadequate hygiene and accommodation conditions, cockroaches and bedbugs in rooms, improper distribution of basic hygiene items, clothing, footwear and bedding, as well as a lack of information about available services and organizations that provide support to international protection seekers outside the Reception Center. In addition, they indicated that they were not familiar with the mechanisms for reporting potential criminal offenses, both within the center itself and outside of it.<sup>440</sup>

In 2024, AYS<sup>441</sup> received several complaints regarding the conditions in Reception Centres for applicants for international protection. With regard to the Reception Centre in Kutina, reported issues included cockroach infestations, shared toilet facilities, accommodation in external housing units, and a lack of electricity in the kitchen. At the beginning of the year, the most frequent complaints concerned limited access to healthcare services, particularly specialist care. Throughout 2024, complaints continued about cockroaches and bedbug at the Reception Centre in Zagreb.

As noted above, the Ombudswoman reported in 2024 that one applicant complained that, after thoroughly cleaning and painting the walls of his room in the Reception Centre, he was, for reasons unknown to him,

<sup>436</sup> Ministry of the Interior: Decision on the direct allocation of financial resources for the implementation of the project "Providing support for reception and accommodation conditions and security of applicants for international protection - SERVICE AND SECURITY (SAS), 30 October 2024, available at: <https://eufondovi.mup.hr/UserDocImages/dokumenti/Odluka%20o%20dodjeli%20financijskih%20sredstava/Odluka%20SAS%204%2011%202024.pdf?vel=926835>.

<sup>437</sup> Ministry of the Interior: Decision on the direct allocation of financial resources for the implementation of the project "Providing food for applicants for international protection accommodated in Reception Centres for applicants for international protection, 26 August 2024, available at: <https://eufondovi.mup.hr/UserDocImages/dokumenti/Odluka%20o%20dodjeli%20financijskih%20sredstava/16.%20Odluka%20Osiguranje%20prehrane%20za%20tmz.pdf?vel=862678>.

<sup>438</sup> In 2023, due to the highest number of expressed intentions to apply for international protection ever recorded in Croatia, applicants experienced difficulties in accessing accommodation. The Ministry of Interior introduced measures to approach that challenge (containers, mattresses in hallways etc.).

<sup>439</sup> Information provided by the Ministry of Interior, 8 March 2024.

<sup>440</sup> Ombudswoman: Report of the Ombudswoman for 2024, page 173, available at: <https://www.ombudsman.hr/hr/download/izvje-e-pu-ke-pravobraniteljice-za-2024-godinu/?wpdmdl=20339&refresh=67efca50785f31743768144/>.

<sup>441</sup> Information provided by AYS, 15 January 2025.

moved to another room, which had bedbugs. Another complained that, as a citizen of Ukraine, he was accommodated with citizens of the Russian Federation. The procedures initiated following complaints have resulted in resolving the problems in individual cases, but systematic attention needs to be paid to the issues of exposure to hygiene, health and safety risks, the gender and age characteristics of applicants, their vulnerability, as well as measures that could have an impact on the prevention of attacks, gender-based violence and harassment.<sup>442</sup>

In the Ombudswoman report for 2024, a case of an applicant for international protection who sought asylum in Croatia due to fear of persecution related to his activism in his country of origin was mentioned. In 2023, the applicant submitted a complaint to the Ombudswoman regarding inadequate living conditions in the Reception Centre for Applicants for International Protection, which led the Ombudswoman to initiate an investigation procedure that same year. The investigation procedure continued in 2024. In addition to filing complaints with the Ministry of the Interior and the Ombudswoman, the applicant also published videos of the living conditions on a YouTube channel, which were later picked up by some media outlets in Croatia. The Ministry of the Interior rejected his application for international protection. Among the reasons for rejection, it was stated that the applicant had violated the privacy and data protection rights of other applicants by recording and publicly sharing videos from inside the reception centre, and that he had made unfounded claims in his posts regarding inadequate food and healthcare for applicants in Croatia. It was further stated that, by doing so, he failed to demonstrate sufficient respect for Croatian institutions and damaged the country's international reputation. In July 2024, the applicant protested in Zagreb against the conduct of Croatian security institutions toward applicants for international protection. He was subsequently convicted of a misdemeanor and was detained for three months in the Transit Reception Centre for Foreigners in Trilj. At the end of August 2024, a formal note was sent to of Croatia by UN Special Rapporteurs on the situation of human rights defenders, the promotion and protection of the right to freedom of opinion and expression, the rights to freedom of peaceful assembly and association, as well as the UN Working Group on Arbitrary Detention. They expressed serious concerns over the rejection of the applicant's application for international protection and his detention, suggesting that these actions appeared to be linked to his exercise of freedom of expression and his activism for the rights of applicants for international protection in Croatia. They requested, among other things, that Croatia clarify the factual and legal grounds for rejecting his application and his detention; explain what steps had been taken to ensure that he was not subjected to any form of retaliation, including the rejection of his application or detention, for his work as a human rights defender and his exercise of the right to freedom of expression; and, if no such steps were taken, to explain the reasons why. They also requested information on what measures had been implemented to ensure that the applicant would not be exposed to *refoulement*. Croatia rejected the claims that living conditions in the Reception Centre for Applicants for International Protection in Zagreb were poor, and denied that improvements were made only after the video was published. It stated that adequate material conditions for reception were provided to all. Furthermore, it emphasized that by recording other applicants and publishing their images online, the applicant had endangered other applicants' safety and the safety of their families, relatives, or friends in their countries of origin, and that through his actions and media appearances, he attempted to influence the outcome of his own case without regard for other applicants.<sup>443</sup>

In 2024, reception and accommodation of applicants for international protection continued to be challenging due to the high number of applicants for international protection.

As noted above, during 2024, as reported by the Croatian Red Cross, a total of 16,349 applicants for international protection were accommodated in Reception Centres for Applicants for International Protection—6,229 at the Reception Centre in Kutina and 10,120 at the Reception Centre in Zagreb.<sup>444</sup>

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<sup>442</sup> Ombudswoman: Report of the Ombudswoman for 2024, page 171, available at: <https://www.ombudsman.hr/hr/download/izvje-e-pu-ke-pravobraniteljice-za-2024-godinu/?wpdmdl=20339&refresh=67efca50785f31743768144/>.

<sup>443</sup> Ombudswoman: Report of the Ombudswoman for 2024, page 170 and 231, available at: <https://www.ombudsman.hr/hr/download/izvje-e-pu-ke-pravobraniteljice-za-2024-godinu/?wpdmdl=20339&refresh=67efca50785f31743768144/>.

<sup>444</sup> Croatian Red Cross: Annual report on the work of the Croatian Red Cross in 2024, page 84, available at: [https://www.hck.hr/UserDocImages/vijesti/2025/AD%205\)%20Izvje%C5%A1%C4%87e%20o%20radu%20HCK%20u%202024.pdf?vel=5096156](https://www.hck.hr/UserDocImages/vijesti/2025/AD%205)%20Izvje%C5%A1%C4%87e%20o%20radu%20HCK%20u%202024.pdf?vel=5096156).

The CRC also reported that during 2024 that due to significant influx of newly arrived applicants for international protection in both Reception Centres for Applicants for International Protection the full engagement of all CRC staff was needed in reception and accommodation activities to ensure that all beneficiaries were provided with beds, hygiene kits, bedding packages, as well as clothing and footwear. During this period, a large number of applicants stayed in the reception centres for only a few days, with some remaining less than 24 hours.<sup>445</sup>

In October 2023, the United Nations agencies operating in Croatia (UNCT - United Nations Country Team) addressed the Ministry of the Interior regarding the increase in the number of irregular migrants, applicants for international protection, and unaccompanied children, offering cooperation with the proposal of a meeting to be informed about plans on accommodation facilities for applicants for international protection. The Ministry of Interior responded, informing the UNCT about all the activities it carries out in the field of international protection, expressing its readiness to continue cooperation with UN organisations, with an emphasis on the need for further training of Ministry of Interior's officials, especially on vulnerable groups in the field of international protection. UNICEF Office for Croatia plans to expand its program activities in 2024, which will be aimed at those seeking international protection, and discussions are ongoing with the Ministry of Interior.<sup>446</sup> The UNICEF Office for Croatia and its implementing partners did not carry out any activities in the Reception Centre for Applicants for International Protection in 2024, however UNICEF had unobstructed access to the Reception Centre for Applicants for International Protection in Zagreb. Cooperation with the Ministry of the Interior also continued through the regular exchange of data on children accommodated in the Reception Centres for Applicants for International Protection. However, according to information received from UNICEF in 2024, more than 30% of children accommodated in the Reception Centres for Applicants for International Protection in Zagreb and Kutina were young children aged 0 to 7. Additionally, many parents or guardians experience the consequences of migration, which can further hinder their integration into the new environment. The lack of adequate support for parents, as well as the lack of professional services for children and age-appropriate content in the reception centres, further aggravates the situation. UNICEF therefore highlighted the urgent need to ensure access to quality early childhood education and care for all children in reception centres, as well as the provision of child-friendly activities and psychological support.<sup>447</sup>

In March 2020, access to Reception Centres for Applicants of International Protection became subject to visitation restrictions, i.e., only personnel of the Ministry of Interior necessary for the normal functioning of the Centre was allowed entrance to the facilities. This means that civil society organisations had to interrupt their activities in the centres, with the exception of the Croatian Red Cross and MdM.<sup>448</sup> The same organisation continued in 2024 and restrictions for nonessential entries to the centres remained in place until the end of 2024. As noted above, as part of the Coordination for Integration, an informal network of civil society organizations led by the CPS, CPS organized a meeting with the Ministry of the Interior in November 2024 to discuss the return of organizations to the Reception Centre for Applicants for International Protection in Zagreb. During the meeting, representatives of eight civil society organizations (AYS, Society for Psychological Assistance, CPS, Center for Cultural Dialogue, JRS, Croatian Law Centre, Borders:none, Rehabilitation Center for Stress and Trauma) presented their reasons for requesting access to the reception centre in order to organize activities and provide support to applicants for international protection. Although an agreement was not reached during the meeting, the Ministry of the Interior agreed to consider the organizations' request and to explore possible options to offer civil society organizations access to space or alternative solutions to improve the visibility of their activities to applicants for international protection within the Reception Centre. It was also agreed that at least one more meeting would be held in 2025.<sup>449</sup>

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<sup>445</sup> Information provided by Croatian Red Cross, 20 January 2025.

<sup>446</sup> Information provided by UNICEF Office for Croatia, 22 January 2024.

<sup>447</sup> Information provided by UNICEF Office for Croatia, 4 February 2025.

<sup>448</sup> Ministry of Interior, Applicants for international protection in the Republic of Croatia are not infected with the coronavirus, 18 March 2020, available in Croatian at: <https://bit.ly/3xgvIOF>.

<sup>449</sup> Information provided by Centre for Peace Studies, 27 February 2025.



## 2.1. Overall living conditions

Applicants can go outside whenever they want but have to return by 11 pm. Under the House Rules, return to centre after 11pm is possible with the permission of the officials of the Reception Centre.

Applicants may stay outside the Reception Centre for Applicants for International Protection for longer than 24 hours with the prior consent of the Reception Centre. If, on the basis of individual assessment, consent is denied, the Reception Centre shall issue a decision thereon.<sup>450</sup>

### State of the facilities

People in the reception centres share rooms. In **Kutina**, families share a room, unaccompanied children and single women are accommodated separately in rooms, while in **Zagreb** a maximum 4 persons can share a room.<sup>451</sup> Families are accommodated in the same room, but in **Zagreb** if there are more than 5 members of one family, they are given 2 rooms if possible.<sup>452</sup> In previous years, there were sufficient showers and toilets and facilities were cleaned on a regular basis, however in 2023 challenges occurred due to high increases in the number of accommodated applicants which has continued in 2024, although, as noted above, the number of applicants was not that high as in 2023.

### Food and religious practice

In both centres, residents receive three meals per day and pregnant women, recent mothers and children up to 16 years shall be also provided with an afternoon snack.<sup>453</sup>

Kitchens, equipped by the Croatian Red Cross, where applicants can prepare meals by themselves, are available in the Reception Centres in **Kutina**,<sup>454</sup> and in **Zagreb**.<sup>455</sup> However, there is no information available whether kitchens were in function in the period from 2020 until the end of 2024.

No problems were reported in connection to the possibility of practicing religion. In the Reception Centre in **Zagreb**, there is a room for Muslim applicants to pray. In **Kutina**, applicants can practice their religion in their rooms.

## 2.2. Activities in the centres

The staff of the Ministry of Interior working in the reception centres was generally sufficient in previous years. However in 2023 and 2024, the main challenges resulted from the high numbers of applicants.

Access to reception centres was restricted from March 2020 until the end of 2024, with the exception of personnel of the Ministry of Interior, Croatian Red Cross and MdM. Apart from CRC and MdM, civil society organisations were not present in the centres in the course of 2024.

As developed above, as part of the Coordination for Integration, an informal network of CSOs, the Center for Peace Studies organized a meeting with the Ministry of the Interior in November 2024. The topic of the meeting was the access of CSOs to the Reception Center for Applicants for International Protection in Zagreb. During the meeting, representatives of eight CSOs presented the reasons for requesting access to the Reception Center in order to organize activities and provide support to applicants for international protection. The Ministry of the Interior agreed to consider the request and explore the possibilities of offering CSOs premises or alternative solutions to increase the visibility of their activities for applicants within the Reception Centre.

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<sup>450</sup> Article 56(8) LITP.

<sup>451</sup> Information provided by the Croatian Red Cross, 18 March 2019.

<sup>452</sup> Information provided by the Croatian Red Cross, 18 March 2019.

<sup>453</sup> Article 20 Ordinance on the Realisation of Material Reception Conditions.

<sup>454</sup> Information provided by the Croatian Red Cross, 18 March 2019.

<sup>455</sup> Information provided by the Croatian Red Cross, 20 December 2019.



In 2024, as in previous years, most of the applicants remained in the centre for a very short period of time and fluctuation of applicants who were voluntarily leaving the centre was significant.

The Croatian Red Cross (CRC)<sup>456</sup> carried out the following activities with applicants for international protection in reception centers in Zagreb and Kutina during 2024 as part of the AMIF funded project:

1. Providing psychosocial and practical support and assistance to applicants, based on the identified needs of individuals and families;
2. Identifying vulnerable groups (children, unaccompanied minors, elderly persons, single women, individuals with physical and mental health challenges, individuals who have experienced trauma or torture, potential victims of human trafficking, and victims of domestic violence) and planning work tailored to their specific needs;
3. Participating in the organization of daily life in the reception centers: assisting with the reception and accommodation of newly arrived applicants; encouraging hygiene and cleanliness maintenance; procuring and distributing hygiene supplies and humanitarian aid; providing various types of information and assistance in solving everyday problems; organizing an Info Corner and Job Center (where applicants participate in maintaining the reception centers and their surroundings); ensuring access to laundry machines and kitchenettes for users; conducting workshops and educational sessions on personal hygiene and space cleanliness to promote hygienic habits, healthy lifestyles, and disease prevention, including the prevention of sexually transmitted diseases;
4. Assisting with access to healthcare services, ensuring specialist medical examinations as prescribed by doctors, providing medications and nutritional supplies as recommended by medical professionals, procuring medical equipment and aids, and conducting first aid courses;
5. Organizing social, educational, and sports activities aimed at empowerment, better socialization, adaptation, and strengthening mutual understanding and cooperation: children's workshops, creative workshops, sports activities, football, gym access for men and women, computer workshops, technical workshops, Croatian language workshops, library access, music room activities, intercultural learning workshops, and education on hygiene and health promotion;
6. Involving applicants in local community programs and activities, and engaging local community volunteers in activities with applicants to promote better socialization, integration into community life, and prevention of conflict situations, misunderstandings, discrimination, and xenophobia;
7. Conducting tasks related to the Tracing Service and restoring family links.

Throughout 2024, CRC worked with preschool children in children's playrooms and children's IT workshops that were available throughout the day, with, on average, between 100 and 150 children on a daily basis. Children who went to school were provided with assistance in learning and writing homework on a daily basis. CRC reported that in 2024 children received support through a playroom and a children's computer workshop, with a total of 761 children participating in these activities throughout the year. Although a large number of children left the reception centre shortly after arrival and were not enrolled in school, learning support was provided to 286 children who were included in the school programme. The CRC also supplied them with all the necessary school supplies and equipment. For adults, Croatian language and IT workshops and sports activities were organized throughout the year, but also to begin the process of integration into Croatian society. A Croatian language workshop for adults, organised by the CRC, was attended by 300 users, while 384 users participated in computer workshops for adults. Various intercultural activities at the reception centres involved more than 2,200 applicants, and over 110 applicants for international protection took part in community-based activities.<sup>457</sup>

Throughout 2024, the trend of a high number of newly arrived applicants in both reception centers continued, which required additional efforts and the involvement of CRC staff in reception and

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<sup>456</sup> Information provided by the Croatian Red Cross, 20 January 2025.

<sup>457</sup> Croatian Red Cross: Annual report on the work of the Croatian Red Cross in 2024, page 84, available at: [https://www.hck.hr/UserDocImages/vijesti/2025/AD%205\)%20Izve%C5%A1%C4%87e%20o%20radu%20HCK%20u%202024.pdf?vel=5096156](https://www.hck.hr/UserDocImages/vijesti/2025/AD%205)%20Izve%C5%A1%C4%87e%20o%20radu%20HCK%20u%202024.pdf?vel=5096156).

accommodation activities to ensure all beneficiaries had access to beds, hygiene packages, bedding sets, clothing, and footwear. During this period, a significant number of applicants for international protection stayed in the reception centers for only a few days, with some staying for less than 24 hours. Consequently, it was impossible to include them in the activities that the CRC organized daily to make their stay in the reception centers as comfortable and fulfilling as possible. Due to these short stays, it was also impossible to conduct initial interviews with beneficiaries to assess their needs and identify their psychological and physical condition.<sup>458</sup> Particular challenges arose in working with applicants for international protection who were returned to Croatia under the Dublin procedure (see [The situation of Dublin returnees](#)).

In 2024, the UNICEF Office for Croatia continued its cooperation with the Ministry of Interior in implementing activities in the field of protection of children and families of refugees and migrants, in particular with the Directorate for Immigration, Citizenship and Administrative Affairs and representatives of the Reception Centre for Applicants for International Protection. The cooperation continued successfully, and the activities of the UNICEF Office for Croatia were supported through the participation of representatives of the Ministry of Interior in the Program Committee for support for the implementation of the Program "*Support to Children and Families in Migration in the Protection and Integration Process in Croatia*". Cooperation also continued through the regular exchange of data on refugee and migrant children in Reception Centres for applicants for international protection, the Reception Center for Foreigners and Transit Reception Center for Foreigners.<sup>459</sup>

Organisations continued providing assistance and activities also outside the Reception Centres:

In 2024, **AYS**<sup>460</sup> continued to run a so-called "free shop" where applicants for and beneficiaries of international protection as well as persons under temporary protection (but also other persons in need) could get clothes, shoes, hygiene items, dishes and other household items free of charge. The Free Shop is open three days a week (Monday, Wednesday, Friday). During 2024, in total 3,023 visits were recorded and 43,545 items distributed. According to AYS, over the past year, a quarter of the beneficiaries were persons under temporary protection who had fled from Ukraine, followed by the highest number of beneficiaries from the Russian Federation, Syria, and Türkiye. A significant portion of the beneficiaries also included individuals returned under the Dublin Regulation. During 2024, applicants for international protection often complained to AYS about the impossibility of obtaining adequate clothes, shoes and hygiene supplies in the Reception Centre.

During 2024, AYS conducted 5 informal Croatian language courses for applicants for and beneficiaries of international protection, each lasting for 4 months with 2 of those courses continuing in 2025. Courses took place in the premises of the AYS integration centre. The courses were held in morning and afternoon sessions, with groups of ten participants per session. The demographic composition of participants varied depending on the course cycle, and participants were from the following countries of origin: Russian Federation, Azerbaijan, Syria, Iran, Türkiye, Palestine, Iraq, and Mongolia.

Cooperation with Croaticum at the Faculty of Humanities and Social Sciences of the University of Zagreb, continued and, in November 2024, a volunteer-organized B1.1 Croatian language course was launched for applicants and beneficiaries of international protection.

AYS gathered interested participants, while Croaticum conducted the initial language testing, and the B1.1 course continued in 2025.

As of 2024, AYS restructured its employment support program as a volunteer-based initiative. In 2024, the program provided employment assistance to approximately 48 individuals through 149 instances of support—including applicants for international protection as well as persons under international and temporary protection. In practice, this support included help with CV writing, identifying suitable job opportunities based on the individual's education, work experience and skills, and contacting potential employers. The program

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<sup>458</sup> Information provided by the Croatian Red Cross, 20 January 2025.

<sup>459</sup> Information provided by UNICEF Office for Croatia, 4 February 2025.

<sup>460</sup> Information provided by Are You Syrious, 15 January 2025.

also introduced CV and job application (cover letter) workshops, as well as informational sessions on employment rights and responsibilities, with the aim of empowering beneficiaries to navigate the Croatian labor market independently. The majority of AYS beneficiaries in the employment support program were applicants for international protection. Challenges reported by AYS included language barriers, non-payment of wages or overtime, lack of information about employee rights (e.g., maternity and parental leave, annual leave entitlements), employers avoiding contract signing, and difficulties in accessing sick leave rights for female applicants for international protection when their child was ill.

Throughout 2024, AYS carried out monthly activities aimed at providing meaningful leisure time for children applicants and beneficiaries of international protection. These monthly activities included a variety of creative and drama workshops, outdoor events, and visits to landmarks and institutions. Over 30 children and their parents participated in these activities. The program was implemented by a team of 14 volunteers, with financial support from the European Solidarity Corps. In November 2024, AYS opened a Mobile Play Centre, in partnership with Step by Step Open University (Pučko otvoreno učilište Korak po korak), funded by the City of Zagreb. An AYS staff member, acting as one of the coordinators of the Play Centre, facilitates weekly workshops for children and parents. The Play Centre is open to all, with a special focus on families at risk of social exclusion.

In 2024, the association *Borders: None* supported applicants for international protection through a diverse range of activities. These activities included legal assistance, language courses, various workshops, a mentoring program, and tech courses. They provided legal assistance mainly related to the international protection procedure using various tools such as email, telephone, and in-person consultations. This multi-channel approach increased their reach and improved accessibility for those unable to attend face-to-face counselling. Language support was offered through Croatian A1/A2 courses and English courses for beginners, as well as professional English classes for intermediate and advanced learners. The Croatian course helped participants develop basic communication skills, enabling faster integration into society. *Borders: None* also provided job search coaching, a personalized service that improved participants' chances of finding employment and becoming more independent when seeking or changing jobs. Additionally, they organized several workshops covering topics such as cultural orientation, practical everyday skills, CV writing, professional culture, and workers' rights and obligations. The association continued its mentoring program to promote the social inclusion of applicants for international protection in the local community, with support from local volunteer mentors. To address growing digital needs, *Borders: None* introduced a digital literacy course focused on smartphone use, alongside its programming course. This initiative ensured the participation of applicants who lacked access to laptops. The programming course equipped participants with technical coding skills to become future programmers, while the digital literacy course boosted their confidence in using technology for communication, job searching, and everyday tasks. All activities took place on the association's premises.<sup>461</sup>

The Croatian Law Centre's (CLC) lawyers were providing legal counselling to interested applicants at CLC premises, but also through phone and email.

Civil Rights Project Sisak were also providing legal support to applicants for international protection (counselling and representation).<sup>462</sup>

Centre for Peace Studies (CPS) provided free legal assistance to applicants for international protection in CPS premises but also online, by e-mail, and by telephone. As part of the free legal aid program, a training session was also held in December 2024, during which Turkish-speaking applicants for international protection were informed about the procedure for international protection, acquiring the right to work, labor rights, and mechanisms for reporting irregularities. In addition, CPS carried out other activities such as two Croatian language courses at A1 level intended for applicants for international protection, persons granted international protection, and foreign workers. Each course cycle lasted three months, with a total of 11 participants. In addition to regular classes, which were held twice a week, each participant had the opportunity to receive additional individual language support provided by volunteers. This allowed them to

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<sup>461</sup> Information provided by *Borders: None*, 12 March 2025.

<sup>462</sup> Information provided by Civil Rights Project Sisak, 15 January 2025.

further practice their acquired knowledge, improve their language skills, and adapt more quickly to everyday communication in Croatian. Furthermore, CPS' volunteers continued to provide regular one-on-one language support for beneficiaries who did not attend the course, thereby ensuring ongoing assistance in language learning and social integration.<sup>463</sup>

In 2024, the Jesuit Refugee Service (JRS) carried out the following activities with applicants for international protection: free legal assistance; mediation in the process of employment of applicants for international protection and integration into the local labour market. Applicants for international protection turned to JRS also because of problems with employers, non-payment of wages, discrimination in the workplace, as well as due to ambiguities regarding the procedure and duration of procedure for international protection. They also seek legal advice on the possibility of transitioning from the status of applicant for international protection to a status based on a work permit, as well as support regarding language learning.<sup>464</sup>

In 2024, the UNICEF Office for Croatia, together with their implementing partners and with the financial support of the State Secretariat for Migration of the Swiss Confederation, carried out activities within the programme "*Support to Children and Families in Migration in the Process of Protection and Integration in Croatia*". The activities focused on families and children seeking international protection and included support in the areas of child protection and guardianship for unaccompanied minors, integrated mental health and psychosocial support for the most vulnerable children, adolescents and refugee parents/caregivers in migration, integration measures in school settings and local communities for migrant children, as well as ensuring timely identification and appropriate support in accessing inclusive and quality early childhood services in the community (particularly early and pre-school education and early childhood development support services). Most activities were aimed at strengthening the capacities of professionals within the education, social welfare and interior affairs systems, as well as civil society organizations. In addition, some activities were directly implemented at the Centre for the Provision of Community Services Zagreb–Dugave, a social welfare institution that provides accommodation to the largest number of unaccompanied children.<sup>465</sup>

### 2.3. Duration of stay in the centres

According to information from the Croatian Red Cross, during 2024 a large number of applicants for international protection stayed in Reception Centre for Applicants for just a few days, while there were also those who stayed for less than 24 hours,<sup>466</sup> so in 2024 Croatia was still perceived as a transit country.

In the regular procedure, applicants can be accommodated at a Reception Centre until the completion of the procedure and a final decision is taken on their case (at first instance and during the administrative dispute). When a final negative decision on the application for international protection has been taken and the time for executing the order to leave the country has elapsed, the right to receiving reception conditions ends.

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<sup>463</sup> Information provided by Centre for Peace Studies, 27 February 2025.

<sup>464</sup> Information provided by Jesuit Refugee Service, 15 January 2025.

<sup>465</sup> Information provided by UNICEF Office for Croatia, 4 February 2025.

<sup>466</sup> Information provided by Croatian Red Cross, 20 January 2025.

## C. Employment and education

### 1. Access to the labour market

#### Indicators: Access to the Labour Market

- |  |   |
|--|---|
| 1. Does the law allow for access to the labour market for asylum applicants?<br>❖ If yes, when do asylum applicants have access the labour market? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No<br>3 months |
| 2. Does the law allow access to employment only following a labour market test?  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No             |
| 3. Does the law only allow asylum applicants to work in specific sectors?<br>❖ If yes, specify which sectors:                                      | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No             |
| 4. Does the law limit asylum applicants' employment to a maximum working time?   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No             |
| 5. Are there restrictions to accessing employment in practice?   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No             |

Applicants have the right to work after the expiration of a period of three months from the day of lodging an application upon which the Ministry of Interior has not yet issued a decision if the applicant's conduct has not affected the reasons for not issuing a decision.<sup>467</sup> The applicant shall exercise the right to work without the need for a residence and work permit or a work registration certificate until the decision on the application becomes enforceable.<sup>468</sup>

The Ministry of Interior should issue a document at the request of an applicant to certify that the applicant has acquired the right to work. On the other hand, if the applicant does not meet the conditions, the Ministry shall issue a decision refusing to issue the certificate.<sup>469</sup> No appeal is permissible against the decision refusing to issue the certificate, but a lawsuit may be brought before an administrative court, within eight days of the day of delivery of the decision.<sup>470</sup>

The applicant must inform the Reception Center for Applicants for International protection in writing about the establishment of an employment relationship and submit the employer's certificate of the concluded employment contract, within 15 days from the conclusion of the employment contract.<sup>471</sup>

A person whose status as an applicant has ceased must, within 15 days of the cessation of the status, return the certificate on the right to work to the Ministry of Interior for annulment.<sup>472</sup>

In 2024, 247 applicants for international protection applied for a work certificate, of which 236 were approved and 11 were rejected.<sup>473</sup>

In 2024, the Administrative Court in Zagreb received 8 lawsuits against the Ministry of Interior's decisions refusing to issue a certificate of the right to work, and all of them were rejected. The average processing time for administrative disputes against decisions refusing to issue a certificate of the right to work before Administrative Court in Zagreb was 198 days in 2024.<sup>474</sup> The High Administrative Court had one case in 2024 in which an appeal against a judgment of the Administrative Court in a case related to the issuance of certificate of the right to work was rejected.<sup>475</sup>

According to the Croatian Employment Service (CES), registration in the records of the CES is regulated by the Law on Labour Market. The applicant for international protection and their family members can

<sup>467</sup> Article 61(1) LITP.

<sup>468</sup> Article 61(5) LITP.

<sup>469</sup> Article 61(2)-(3) LITP.

<sup>470</sup> Article 61(4) LITP.

<sup>471</sup> Article 61(6) LITP.

<sup>472</sup> Article 61(7) LITP.

<sup>473</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).

<sup>474</sup> Information provided by Administrative Court in Zagreb, 17 January 2025.

<sup>475</sup> Information provided by High Administrative Court, 22 January 2025.

register at the Employment Service if the Ministry of Interior has not made a decision on the application for international protection within the legally prescribed period. They should apply and register at the Employment Service according to their place of residence, *i.e.*, residential address.<sup>476</sup> According to the data of the CES, 35 applicants for international protection (of whom 13 women) were registered in the records of unemployed persons on 31 December 2024. In 2024, 53 applicants for international protection were receiving individual counselling at CES and 32 applicants for international protection were employed through CES. During 2024, 16 applicants were included in the measures of the active employment policy with the aim of a more successful and faster integration into the labour market.<sup>477</sup>

Applicants can work on a voluntary basis in both Reception Centres.<sup>478</sup> According to the Ordinance on the Realisation of Material Reception Conditions, applicants accommodated in the Reception Centre for Applicants for International Protection may, at their own request and with a signed statement, assist in activities related to the maintenance of the centre and housing such as cleaning, landscaping, gardening, help in storehouse, washing, ironing, painting the walls, etc., and can be voluntarily involved in work for the benefit of local community or the work of humanitarian organisations. The Croatian Red Cross runs the Job Center within which the applicants participate in the maintenance of the Reception Centre for Applicants for International Protection and its environment.

Are You Syrious (AYS) reported that, in 2024, they provided information to applicants for international protection on the right to work and provided support in job searching (e.g., writing CVs, contacting employers).<sup>479</sup> According to AYS, the problems that appeared during 2024 include non-payment of wages or overtime hours, failure to inform applicants about employee rights and avoidance of signing contracts by employers.

Jesuit Refugee Service,<sup>480</sup> also provided support in job searching.

In 2024, the Croatian Law Centre, as an implementing partner of UNHCR, in collaboration with the Croatian Employment Service produced the brochure „*The right to work – applicants for international protection, persons granted international protection and foreigners under temporary protection*”. The brochure provides key information on the right to employment and work, as well as the protection of these rights. The brochure is available in Croatian, English, Ukrainian, Russian, French, Turkish, Arabic and Farsi.<sup>481</sup> The brochure is available to beneficiaries in all regional offices and services of CES.

## 2. Access to education

### Indicators: Access to Education

- |  |   |
|--|---|
| 1. Does the law provide for access to education for asylum-seeking children? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Are children able to access education in practice?                        | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

The right to education is a constitutional right for all children staying in Croatia. According to the LITP, child applicants are entitled to primary and secondary education under the same conditions as for Croatian nationals.<sup>482</sup> Applicants who have begun to exercise the right to secondary education are allowed to continue secondary education even after they have turned 18.<sup>483</sup>

<sup>476</sup> Article 14 Law on Labour Market, Official Gazette 118/2018, 32/2020, 18/2022, 156/2023, 152/2024.

<sup>477</sup> Information provided by the Croatian Employment Service, 27 January 2025.

<sup>478</sup> Article 19 Ordinance on the Realisation of Material Reception Conditions.

<sup>479</sup> Information provided by AYS, 15 January 2025.

<sup>480</sup> Information provided by Jesuit Refugee Service, 15 January 2025.

<sup>481</sup> CLC: brochure „The right to work – applicants for international protection, persons granted international protection and foreigners under temporary protection”, available in in Croatian, English, Ukrainian, Russian at: <https://www.hpc.hr/2024/02/05/izradena-brosura-pravo-na-rad-traziteljja-medunarodne-zastite-osoba-s-odobrenom-medunarodnom-zastitom-i-osoba-pod-privremenom-zastitom/> and in French, Turkish, Arabic and Farsi at: <https://www.hpc.hr/2024/08/23/brosura-o-pravu-na-rad-dostupna-i-na-francuskom-turskom-i-farsi-jeziku/>.

<sup>482</sup> Article 58(1) LITP.

<sup>483</sup> Article 58(2) LITP.



According to the LITP, children can access education within 30 days of lodging an application.<sup>484</sup>

According to the Ministry of Interior, the procedure for enrolment of asylum-seeking children in pre-school, elementary or high school is performed by the employees of the Reception Centre for Applicants for International Protection, while for those children who are accommodated in social welfare institutions, the procedure is carried out by their guardians.

According to the Ministry of Science and Education, in order to be included in the educational system, candidates are required to have the following documents: a certificate of status in the Republic of Croatia; a certificate of residence in the Republic of Croatia; an identity document (birth certificate, identity card, passport or corresponding document of the Ministry of Interior of the Republic of Croatia); and a document testifying to a previous education.<sup>485</sup> If they do not have a document on previous education, they need to give a statement before a public notary and present it to the services of the educational institution in order for them to organise an enrolment test and determine which class the candidate can attend.

Child applicants are also entitled to special assistance to learn Croatian and to make up for the knowledge they might lack in some school subjects, in the form of preparatory and supplementary classes.<sup>486</sup> In November 2011, a Programme of Croatian for preparatory classes for primary and secondary school students who do not speak or speak Croatian insufficiently was adopted.<sup>487</sup> This is an intensive 70-hour course of Croatian, spread over a maximum of one academic year.

At the local level in the city of Zagreb, during 2024, 9 children that were granted international protection and 92 children under temporary protection attended kindergartens; and 35 children applicants for international protection, 46 children granted international protection and 274 children under temporary protection attended primary schools. High schools in the City of Zagreb were attended by 5 students seeking international protection, 21 students under international protection and 115 students under temporary protection. The implementation of the project "*ALTERNATIVE TEACHING - INTERCULTURAL SCHOOL CLASS*" continued in Zagreb primary and secondary schools. This project, which contributes to the reduction of prejudices by creating prerequisites for building a fair and inclusive society, was implemented during 2024 in 49 Zagreb schools (29 elementary and 17 secondary schools), and included 1,300 students.<sup>488</sup>

The Ombudsperson for Children, in 2024 report, stated that according to data from the Croatian Red Cross (CRC), 27 children were included in the education system in Zagreb in 2024. Of these, five children were enrolled in preschool, 15 in primary school, and seven in secondary school. In Kutina, 21 children were enrolled in school, including two in preschool, 13 in primary school, and six in secondary school. According to data from the Ministry of the Interior, 45 children were included in the education system in 2024. Of these, 33 attended primary school, seven were enrolled in secondary education, two children were included in adult education programs, and three were enrolled in kindergarten. By the end of 2024, 30 children were still in the education system —24 in primary school, four in secondary school, and two in adult education institutions. Children who are applicants or beneficiaries of international protection continue to face challenges within the educational system. According to the Law on Education in Primary and Secondary Schools, primary education begins with enrolment in the first grade of primary school and is compulsory for all children, typically from the age of six to 15. This represents a significant obstacle for migrant children due to differences in educational systems. The Ombudsperson for Children monitored the case of a child from an Reception Centre for Applicants for International Protection who, at the time of submitting the documentation related to enrolment in the education system, was 15 years old. The administrative department of one county considered that the boy did not meet the conditions for inclusion in the

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<sup>484</sup> Article 58(3) LITP.

<sup>485</sup> Information provided by the Ministry of Science and Education during the webinar „The Protection of Unaccompanied Children: Procedure and Exercising Rights After the Accommodation of Children” organised by the Croatian Law Centre on 2 March 2021.

<sup>486</sup> Article 58(4) LITP; Article 43 Law on Education in Primary and Secondary Schools (Official Gazette 87/2008., 86/2009., 92/2010., 105/2010., 90/2011., 5/2012., 16/2012., 86/2012., 94/2013., 152/2014., 7/2017., 68/2018., 98/2019., 64/2020., 133/2020., 151/2022., 155/2023., 156/2023.)

<sup>487</sup> Official Gazette 151/2011, available in Croatian at: <https://bit.ly/3Xs6dsO>.

<sup>488</sup> Information provided by the City of Zagreb, 28 January 2025.

educational system, stating that he was over 15 years of age and had completed only the sixth grade of primary school in his country of origin. The boy was referred to an adult education program, after which the then Ministry competent for education informed Ombudswoman that the county had found a way to include the child in primary school.

The Ombudsperson for Children also reported that the adult primary education program is not adequate for the developmental needs of an adolescent child entering a new community, and it does not include preparatory language classes. In cases where the child does not have a school certificate, it is often not possible to conduct an assessment in the adult primary education programs to which the children are referred. As a result, a child who has reached the age of 15 may remain outside the education system for a long period. Schools are obliged to include children in preparatory Croatian language classes, which is one of the rights of children who are applicants or beneficiaries of international protection. According to the prescribed procedure, the school submits a request for approval of preparatory classes to the administrative department of the county, the City Office for Education, Sports, and Youth of the City of Zagreb, and the Ministry of Science Education and Youth. The implementation of the course cannot begin until approval is received. This process is slow, and the start of classes for each student can be delayed by several months, postponing the support for the child. In some cases, children, once the preparatory course is approved, are referred to another school where the classes are conducted, resulting in the loss of part of their regular lessons at their original school. The preparatory course consists of 70 hours, with the possibility of an additional cycle of 70 hours. However, 140 hours of Croatian language instruction are not sufficient for the child to independently participate in the educational process, and there are still no textbooks adapted for children from other language backgrounds. Among the identified issues are the lack of support for language learning and homework assistance. Being in the classroom with other peers while waiting for the approval of language courses causes frustration for children due to their lack of knowledge of the language and consequent understanding of the content. They are often enrolled in lower grades, which affects their socialization, leads to isolation, and causes peer bullying. There are also issues with determining the level of education due to a lack of documents regarding educational achievements, differences in educational systems, and some children have not attended any educational system for years. For children with trauma, the only systematic support is often the school psychologist, who typically does not speak the child's native language, making their support insufficient for the child's needs. The issue of language barriers and the lack of teaching assistants to help children overcome the curriculum has been repeatedly pointed out by organizations working with children in the educational system.<sup>489</sup>

In March 2024, AYS<sup>490</sup> contacted the Office of the Ombudswoman for Children regarding the case of 2 children accommodated in the Reception Center for Applicants for International Protection in Kutina who were not enrolled in primary and secondary school, respectively, based on a negative decision by the Administrative Department for Education, Culture, Sports, Youth and Civil Society of Sisak-Moslavina County. The Ombudswoman for Children informed AYS that one child was eventually enrolled in primary school in Kutina, however only after several months and after the Ombudswoman contacted the Ministry of Science, Education and Youth.

The UNICEF Office in Croatia reported that in 2024 standardized tests for assessing Croatian language proficiency in non-native speaking students have been developed and printed in cooperation with the National Centre for External Evaluation of Education. Schools can apply free of charge to administer these tests, and the results provide schools with a more objective insight into the Croatian language proficiency of non-native students.<sup>491</sup>

The UNICEF Office in Croatia also reported that, in cooperation with its implementing partner, the Faculty of Humanities and Social Sciences at the University of Zagreb, it is developing an online professional development programme for educational staff in kindergartens, primary and secondary schools through self-paced learning as part of the PREMISE programme for Inclusive, Supportive and Equitable Education

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<sup>489</sup> Ombudswoman for Children: *Report on the work of the Ombudswoman for Children in 2024*, page 205, available at: <https://dijete.hr/hr/download/izvjesce-o-radu-pravobraniteljice-za-djecu-za-2024-godinu/>

<sup>490</sup> Information provided by AYS, 15 January 2025.

<sup>491</sup> Information provided by UNICEF Office for Croatia, 4 February 2025.

for Migrants. The programme will be adopted by the Education and Teacher Training Agency, while the Croatian Academic and Research Network – CARNET will ensure its long-term free online availability for educators, teachers and professional associates in the education system. As a foundation for the development of the training programme, a needs assessment is being conducted to examine the educational challenges faced by students of migrant origin and their families in early and preschool education, primary education (both class and subject teaching levels), and secondary education, as well as the needs of educational professionals in creating a supportive, inclusive, and equitable environment for children of migrant origin. Based on the assessment and the existing legal framework, evidence-based guidelines and recommendations will be developed to improve the quality of education and the integration of children and families of migrant origin into Croatian society. The assessment results and recommendations will be available in 2025.<sup>492</sup>

AYS reported that the problems related to inclusion of children to preparatory classes continued in 2024. According to them, in practice, organisation of preparatory classes is extremely lengthy and children often wait for months before preparatory classes are approved. Also, some children have to go to another school for preparatory classes, and as a result, they cannot attend part of classes at their own school. If a child after 70 hours of preparatory classes does not meet the minimum requirements for inclusion in the regular education system, they should once again attend the program of preparatory classes. At the same time, in most cases, 140 hours of learning Croatian language is not enough for a child to be able to use the language independently to successfully achieve academic goals.<sup>493</sup>

At the local level, a Croatian language course, organized by the City of Zagreb, was held in 2024 for applicants for international protection, persons granted international or temporary protection, and foreign workers with residence and work permits, with the possibility of taking an exam and obtaining a certificate of knowledge of the Croatian language. In addition, the Croatian language course was conducted by 6 civil society organizations selected through a public call for expressions of interest of civil society organizations to participate in the implementation of the Action Plan of the City of Zagreb. The participants mostly attended language courses at the entry level (A1, A2 and B1).

The free Croatian language course was attended by 443 participants, while 10 people passed the verified exam without attending the course.<sup>494</sup>

Beyond access to schools, several organisations provide educational activities and language classes as described in detail in [Conditions in Reception Facilities](#).

## D. Health care

### Indicators: Health Care

- |  |   |   |
|--|---|---|
| 1. Is access to emergency healthcare for asylum applicants guaranteed in national legislation?               | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No   |
| 2. Do asylum applicants have adequate access to health care in practice?                                     | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> Limited <input type="checkbox"/> No |
| 3. Is specialised treatment for victims of torture or traumatised asylum applicants available in practice?   | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> Limited <input type="checkbox"/> No |
| 4. If material conditions are reduced or withdrawn, are asylum applicants still given access to health care? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Limited <input type="checkbox"/> No            |

### 1. Primary health care

Applicants are entitled to health care. In 2023, the LITP was amended to extend applicants' access to medical care beyond emergency situations, upon a doctor's recommendation.<sup>495</sup> The LITP prescribes that the health care of applicants includes emergency medical assistance and the essential treatment of

<sup>492</sup> Information provided by UNICEF Office for Croatia, 4 February 2025.

<sup>493</sup> Information provided by Are You Syrious, 15 January 2025.

<sup>494</sup> Information provided by the City of Zagreb, 28 January 2025.

<sup>495</sup> EUAA: National Asylum Developments 2024, June 2024, page 7, available at: [https://euaa.europa.eu/sites/default/files/publications/2024-06/2024\\_National\\_Asylum\\_Developments\\_EN.pdf](https://euaa.europa.eu/sites/default/files/publications/2024-06/2024_National_Asylum_Developments_EN.pdf).

illnesses and of serious mental disorders in accordance with medical indication. An applicant who needs special reception and/or procedural guarantees, particularly victims of torture, rape or other serious forms of psychological, physical or sexual violence, shall be provided with appropriate health care related to their specific condition, i.e., the consequences caused by said acts.<sup>496</sup> The costs of the health care shall be borne by the ministry responsible for health care.<sup>497</sup>

In 2020, an Ordinance on health care standards for applicants for international protection and foreigners under temporary protection entered into force regulating, amongst other, initial and supplementary medical examinations and the scope of health care for applicants for international protection.<sup>498</sup> Additionally, the Ordinance lists the different vulnerable groups entitled to health care as follows: persons deprived of legal capacity, children, unaccompanied children, elderly and infirm persons, seriously ill persons, persons with disabilities, pregnant women, single parents with a minor children, people with mental disabilities and victims of human trafficking, victims of torture, rape or other psychological, physical and sexual violence, such as victims of female genital mutilation. These categories of persons have a right to psychosocial support and assistance in appropriate institutions. A pregnant woman or a parturient woman who requires monitoring of pregnancy and childbirth is entitled to health care to the same extent as an insured person benefiting from a compulsory health insurance. Children up to the age of 18 are guaranteed the entire right to health care in accordance with the legislation governing the right to health care from compulsory health insurance.<sup>499</sup>

Medical assistance is available in the Reception Centres for Applicants for International Protection in **Zagreb** and **Kutina**. While no newer information is available for the period from 2019 until the end of 2024, at the beginning of 2019, the Ministry of Interior reported that health care is also provided by the health care institutions in **Zagreb** and **Kutina** designated by the Ministry of Health.<sup>500</sup> In the Health Centre, a competent ambulance (family medicine) has been designated to provide health care from the primary health care level for chronic and life-threatening illnesses. A specialist ambulance for vulnerable groups has been appointed by the Ministry of Health and Local Health Centres. This includes: paediatric ambulance, gynaecological ambulance, school medicine ambulance, neuropsychiatric ambulance at the Hospital of **Kutina**, ambulance for addiction treatment; dental ambulances and Psychiatric Hospital in **Zagreb**.

In addition, applicants are referred to local hospitals, i.e., in **Sisak** for those accommodated in Kutina, and the Hospital of **Zagreb**. Vaccination is performed by doctors in health centres or by specialists of school medicine.

In April 2024, the Ministry of the Interior adopted a decision on the allocation of financial resources for the implementation of the project “6P – Support in Providing Healthcare to Applicants for International Protection” under AMIF. The purpose of the project is to promote and protect the health of applicants for international protection and to prevent disease by ensuring access to medical consultations at the level of primary healthcare.<sup>501</sup>

In 2024, the organization “*Médecins du Monde ASBL - Dokters van de Wereld VZW*” (MDM-BELGIQUE)<sup>502</sup> continued to provide multidisciplinary and linguistically -adapted care to applicants for international protection (especially in identifying and supporting the most vulnerable among them (i.e., women, children, minors, LGBTQ+ individuals, survivors of gender - based violence, human trafficking or torture, persons with disabilities, children with developmental difficulties and their families, single parents etc.)) in the Reception Centers for Applicants for International Protection in Zagreb and Kutina.

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<sup>496</sup> Article 57(1) -(2) LITP.

<sup>497</sup> Article 57 (4) LITP.

<sup>498</sup> Official Gazette 28/2020, available in Croatian at: <https://bit.ly/3asTWel>.

<sup>499</sup> Article 9 (1) (4) Ordinance on health care standards for applicants for international protection and foreigners under temporary protection

<sup>500</sup> Information provided by the Ministry of Interior, 28 January 2019.

<sup>501</sup> Ministry of the Interior: Decision on the allocation of financial resources for the implementation of the project “6P – Support in Providing Healthcare to Applicants for International Protection”, 25 April 2024, available at: <https://eufondovi.mup.hr/UserDocsImages/dokumenti/Odluka%20o%20dodjeli%20financijskih%20sredstava/Odluka%20-%206P.pdf?vel=847607>.

<sup>502</sup> Information provided by MDM-BELGIQUE, 17 February 2025.

Direct services to applicants for international protection were provided every working day in the Reception Center in Zagreb, with team member also present on weekends and holidays. The medical and mental health teams, depending on needs and availability, also provided services at the Kutina Reception Center approximately once a week.

In 2022, MDM-BELGIQUE's team developed info-prevention posters/leaflets on three different topics: "*How I feel matters*", "*Everyone has the right to birth control*" and "*There is no room for violence in the family*"; as well as a brochure on mental health.<sup>503</sup> In 2023, MdM issued the publication "*Physical and mental health of applicants for international protection in the Republic of Croatia - new trends, observations, challenges and recommendations*".<sup>504</sup>

### **Complementary services by NGOs**

MDM-BELGIQUE<sup>505</sup> continued to provide multidisciplinary and linguistically adapted medical and mental health care to applicants for international protection during 2024.

The organisation achieved the following results in 2024:

- MDM-BELGIQUE continued to conduct initial health examinations for newly arrived applicants for international protection. The organization facilitated access to medical consultations, interventions, and the distribution of prescribed medication through team work of general practitioners, nurses, and interpreters (for Arabic, Farsi, Urdu, Pashto, Russian, Spanish, Turkish, and French). Additionally, MDM-BELGIQUE worked in partnership with the health center Dom zdravlja Zagreb - Centar to ensure comprehensive care.
- Direct provision of services was provided every working day in the Reception Center in Zagreb, with a team member also present on weekends and holidays. The medical and mental health teams, depending on needs and availability, also provided services at the Kutina Reception Center approximately once a week.
- To ensure accessible and comprehensive care and support, MDM-BELGIQUE's social worker and interpreters provided timely information and practical assistance to applicants for international protection in accessing their rights. This included scheduling appointments for specialist examinations and diagnostic procedures at public health institutions, organizing transportation (with support from the Croatian Red Cross), and providing interpretation assistance during appointments. By coordinating transportation and accompanying applicants to public health institutions, MDM-BELGIQUE facilitated further medical examinations and treatments, helping to bridge language and cultural barriers between patients and healthcare providers. Interpreters were available for Arabic, Farsi, Urdu, Pashto, Russian, Spanish, and French.
- The MDM-BELGIQUE medical team promptly responded to emergency cases and, in collaboration with the epidemiologist from the Teaching Institute of Public Health "Dr. Andrija Štampar", actively worked to isolate infected individuals and prevent the spread of infectious diseases within the Reception Center.
- Vaccinations for children of applicants for international protection and medical examinations required for preschool and school enrolment continued in partnership with the health center Dom zdravlja Zagreb - Centar and the Teaching Institute for Public Health "Dr. Andrija Štampar". MDM-BELGIQUE also ensured healthcare access for pregnant women in the Reception Center, arranging transport/accompanying with interpreters to the Women's Diseases and Obstetrics Clinic at Clinical Hospital in Zagreb. Postpartum care was provided through visits from home care nurses in collaboration with the health center Dom zdravlja Zagreb - Centar in Dugave.

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<sup>503</sup> Information provided by MdM, 14 February 2023.

<sup>504</sup> MdM: Publication "Physical and mental health of applicants for international protection in the Republic of Croatia - new trends, observations, challenges and recommendations", available in Croatian at: <https://bit.ly/3IQ6Z17>; and in English at: <https://bit.ly/3C4pO6r>.

<sup>505</sup> Information provided by MDM-BELGIQUE, 17 February 2025.

- Additionally, in cooperation with the health center Dom zdravlja Zagreb - Centar, MDM-BELGIQUE organized necessary dental care for beneficiaries, with successful collaboration continuing in 2024 with dental specialists.
- In 2024, the MDM-BELGIQUE medical team conducted 5,246 medical consultations for 2,495 applicants for international protection, including 2,212 initial medical examinations for newly arrived individuals. Of these consultations, 24.38% were with women, and 14.15% with children. The patients came from a diverse range of countries, highlighting the exceptional cultural and linguistic diversity within the applicant population. The five most common countries of origin among MDM-BELGIQUE patients were the Russian Federation (16.59%), Syria (15.67%), Türkiye (13.03%), Afghanistan (10.66%), and Pakistan (4.73%).
- In addition, MDM-BELGIQUE organized a total of 1,030 transportation and accompaniment services for 433 applicants to public health institutions for specialist and diagnostic exams. This included transportation for pediatric care, vaccinations, and school medicine specialist exams for child applicants.

The most common health issues identified among applicants for international protection were skin diseases (16.34%), respiratory illnesses (13.69%), musculoskeletal problems (10.16%), and digestive issues (8.18%).

Alongside particularly complex cases (including post-operative care following traffic accidents and multiple traumas, severe mental health disorders, chronic diseases, adults and children with disabilities, cancer, and acute conditions), the increase in newly arrived applicants for international protection over the past three years, coupled with a high transit dimension and a rise in incoming transfers under the Dublin III Regulation, has led to a significant increase in the number of medical consultations. This has also resulted in additional administrative tasks related to arranging medical tests, specialist exams, and transportation. In some instances, appointments were cancelled due to individuals leaving Croatia before the scheduled dates. A significant number of applicants also had shorter stays in Reception Centers, preventing them from completing the initial health examination. For all other applicants, initial health examinations were organized daily.

One of the ongoing challenges throughout 2024 in facilitating access to healthcare for applicants for international protection in Croatia was the difficulty in registering employed individuals with family doctors/general practitioners and other primary healthcare specialists. As the number of employed applicants entitled to mandatory health insurance through the Croatian Health Insurance Fund (HZZO) continued to rise, it became increasingly important to provide information and support for these patients in registering with general practitioners, dentists, and gynecologists within the public healthcare system. Despite efforts to assist patients in registering with doctors, a significant number of applicants still remained unregistered and lacked a designated general practitioner. Many doctors refused to register them, citing language barriers, time constraints, or the lack of sufficient spots for new patients as reasons.

Through daily direct work with applicants and beneficiaries of international protection, MDM-BELGIQUE observed that many applicants for international protection returned under Dublin III Regulation suffer from various physical and/or mental health issues. This contrasts with the generally healthier population of applicants entering Croatia through non-EU countries. In 2024, Dublin transfers included oncology patients, individuals with chronic illnesses, people with disabilities, children with developmental disorders and special needs, and individuals who had started treatment in their previous country of residence (including interruptions in hospitalization). There was also an increase in patients undergoing psychiatric and psychotherapeutic treatment for severe mental health conditions. It was noted that transfers often did not include the transfer of medical records, which delayed the continuation of treatment and disrupted the continuity of care for those arriving in Croatia under Dublin III.

Croatian Red Cross reported that in 2024 access to healthcare services was provided to 599 applicants for international protection through specialist paediatric examinations, gynaecological check-ups,



consultations at the clinic for child and adolescent psychiatry, dental care, as well as a range of other aids prescribed by the competent physician.<sup>506</sup>

## 2. Mental health

Psychological counselling and support was provided by MdM during 2024.<sup>507</sup>

Regarding mental health care and psychosocial support organised for applicants for international protection, throughout 2024 MDM-BELGIQUE psychologists were available for initial psychological assessments and individual counselling every working day at the Reception Centre for Applicants for International Protection in Zagreb, as well as for crisis interventions when needed.

In 2024, there was also an increase in the number of applicants suffering from mental health disorders. Notably, 64% of patients with mental health conditions staying at the Reception Center for Applicants for International Protection in Zagreb were transferred under Dublin III Regulation. These patients had previously been treated for various disorders, including paranoid schizophrenia, unspecified non-organic psychosis, suicidality, post-traumatic stress disorder, major depressive episodes, addiction syndrome, anxiety disorders, panic disorders, personality disorders, and adjustment disorders. In many cases, symptoms were exacerbated or new mental health issues developed after the transfer. This situation led to frequent crisis interventions and hospitalizations organized by the MDM-BELGIQUE team following transfers. Given the intense and often traumatic stress associated with involuntary transfers, it is crucial to highlight the retraumatizing risks of transferring applicants for international protection under Dublin III, especially for vulnerable individuals (i.e., people with pre-existing mental health conditions, severe chronic or acute conditions, individuals who have scheduled medical procedures, those subjected to force during transfer, people separated from family or support networks, and individuals who have lived in the transfer country for an extended period). Involuntary transfers under the Dublin III Regulation can severely impact the mental and physical health of applicants for international protection, as they can undermine their sense of stability and security, interrupt their recovery, worsen their conditions, and lead to long-term health consequences that permanently affect their well-being.

Compared to previous years, 2024 saw a decrease in cases of sexual and gender-based violence (SGBV), with 63 recorded cases compared to 106 in 2023. MDM-BELGIQUE provided appropriate psychological support, psychiatric treatment, and further referrals for all survivors of violence, in collaboration with relevant service providers.

Throughout 2024, 956 individual psychological counselling sessions were held, and referrals were made to a psychiatric specialist from the MDM-BELGIQUE team (170 psychiatric exams). When needed, referrals were also made to the Psychiatric Clinic "Sveti Ivan", the Psychiatric Hospital for Children and Youth, the Addiction Department at Clinical Hospital Sestre Milosrdnice, and for hospital treatment where indicated.

Additionally, in 2024, MDM-BELGIQUE organized 32 workshops for women applicants for international protection at the Reception Center in Zagreb. These workshops aimed to inform beneficiaries about MDM-BELGIQUE services, foster group cohesion, and encourage the development of support networks among participants. Activities included jewellery making, henna drawing, music and dance workshops, and other creative and relaxing activities.

Regarding informative and preventive activities, in 2023 MDM-BELGIQUE developed a platform for basic psychological support "Mental Health Zone" ([www.mental-health-zone.com](http://www.mental-health-zone.com)) available in eight languages - Croatian, English, French, Spanish, Arabic, Farsi, Turkish and Bajaj. The platform was designed as an interactive online tool which goal is to provide support to beneficiaries of the MDM-BELGIQUE team's services, as well as to all interested parties, in dealing with short-term and long-term reactions to crisis events and traumatic experiences and their psychological consequences. The platform contains psycho-educational content with practical advice and exercises that can help people integrate the crisis experience

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<sup>506</sup> Croatian Red Cross: Annual report on the work of the Croatian Red Cross in 2024, page 84, available at: [https://www.hck.hr/UserDocImages/vijesti/2025/AD%205\)%20Izvje%C5%A1%C4%87e%20o%20radu%20HCK%20u%202024.pdf?vel=5096156](https://www.hck.hr/UserDocImages/vijesti/2025/AD%205)%20Izvje%C5%A1%C4%87e%20o%20radu%20HCK%20u%202024.pdf?vel=5096156).

<sup>507</sup> Information provided by MdM, 17 February 2025.

more healthily and strengthen natural mechanisms for dealing with stress while encouraging psychological resilience.

The platform was developed by the MDM-BELGIQUE expert team in Croatia as part of the so called OPOPS project, financed by the European Social Fund (ESF) and the Office for Cooperation with NGOs of the Government of the Republic of Croatia.

### 3. Special health needs

Applicants who need special reception and/or procedural guarantees, especially victims of torture, rape or other serious forms of psychological, physical or sexual violence, shall be provided with the appropriate health care related to their specific condition or the consequences resulting from the mentioned acts.<sup>508</sup> According to the Law on Mandatory Health Insurance and Health Care for Foreigners in the Republic of Croatia, an ordinance which defines the scope of the right to health care for applicants who have been subject to torture, rape or other serious forms of violence and as well as for those with special health care needs, must be adopted. The Ordinance on health care standards for applicants for international protection and foreigners under temporary protection was adopted in 2020 and entered into force in March 2020 (see [Primary health care](#) for more information).<sup>509</sup>

According to national legislation, the procedure of recognising the personal circumstances of applicants shall be conducted continuously by specially trained police officers, employees of the Ministry of Interior and other competent bodies, from the moment of the expression of the intention to apply for international protection until the delivery of the decision on the application. However, according to CLC's knowledge there is still no further detailed guidance available in the law, nor an early identification mechanism in the form of internal guidance.

The Standard Operational Procedure in Cases of Sexual and Gender-Based Violence in the Reception Centres for Applicants of International Protection" was developed in cooperation with the Ministry of Interior, UNHCR, IOM, MDM-BELGIQUE, the Croatian Red Cross and the Croatian Law Centre. It entered into force in April 2021.

The UNICEF Office in Croatia reported that, in cooperation with its implementing partner, the Croatian Association for Early Childhood Intervention (HURID), is developing an online professional training programme titled "*Providing Culturally Sensitive Early Childhood Intervention Services to Migrant Children and Families*". The aim of the programme is to enhance the skills and knowledge of early intervention service providers in working with children and families from different cultural backgrounds, with the goal of improving the development of children at risk of developmental delays or difficulties, aged 0 to 7.<sup>510</sup>

## E. Special reception needs of vulnerable groups

### Indicators: Special Reception Needs

1. Is there an assessment of special reception needs of vulnerable persons in practice?

☐ Yes

☒ No

The LITP enumerates as vulnerable persons: persons without legal capacity, children, unaccompanied children, elderly and infirm persons, seriously ill persons, disabled persons, pregnant women, single parents with minor children, persons with mental disorders and victims of trafficking, as well as victims of torture, rape or other forms of psychological, physical and sexual violence, such as victims of female genital mutilation.<sup>511</sup> The LITP provides special procedural and reception guarantees (see section on [Special Procedural Guarantees](#)).

<sup>508</sup> Article 57(2) LITP.

<sup>509</sup> Official Gazette 28/2020, available in Croatian at: <https://bit.ly/2QKE3ZK>.

<sup>510</sup> Information provided by UNICEF Office for Croatia, 4 February 2025.

<sup>511</sup> Article 4(1)(14) LITP.

However, the Ministry of Interior still does not have a special unit dealing with vulnerable groups, but accommodates their needs in the general reception system.

When accommodating applicants in the Reception Centre, gender, age, position of vulnerable groups, applicants with special reception needs and family unity shall be particularly taken into account.<sup>512</sup> Those with special reception needs may be placed in an appropriate institution or can be granted accommodation in accordance with regulations on social welfare, if accommodation appropriate for their needs cannot be provided in the Reception Centre.<sup>513</sup>

There is no public information available of the number of applicants for international protection who were identified as members of vulnerable groups in 2024. In her 2024 report, the Ombudswoman stated that, in order to ensure all reception and procedural guarantees in line with EU and national regulations, as well as to adequately identify vulnerabilities in the context of the increasing number of applicants, it is necessary to employ a sufficient number of staff responsible for reception, as well as those handling international protection procedures.<sup>514</sup>

The Ordinance on the Realisation of Material Reception Conditions prescribes that reception conditions should be adapted to the needs of applicants, psychosocial support should be provided, and special care should be given to applicants with special reception needs. The process of identifying those with special reception needs should be conducted by professionals who provide psychosocial support in the Reception Centre, and if necessary, the Institution for Social Welfare can participate in the assessment. The Institution for Social Welfare involved in the procedure for identifying applicants with special reception needs shall notify the Reception Centre of all measures and actions taken.<sup>515</sup>

Applicants with special health care needs shall be provided a special diet, based on the recommendations of the physician.<sup>516</sup>

There is no monitoring mechanism in place with regards to measures for addressing special needs of applicants accommodated in the centres. However, according to the Ministry of Interior, measures for vulnerable persons include accommodation in a room in a different wing of the Reception Centres more suitable to the person's needs or transfer to another facility, constant monitoring of psychological and mental health from psychologist and social workers, food deliverance to room when needed, etc.<sup>517</sup>

Social workers of the Ministry of Interior and the Croatian Red Cross are available daily in the Reception Centres and can provide support. In practice, during their regular work and communication with applicants as well as during individual and group support, Croatian Red Cross employees can observe the needs of vulnerable groups and, where there is a need, can accordingly propose changes in the reception of particular applicants to the Head of Reception Centre (for example, a person may need to be accommodated in a single room, or with other persons, or may need to be relocated to the Reception Centre in Kutina, which is specifically designed for vulnerable applicants).

The Ministry of Interior, depending on the needs of the applicant, cooperates with other competent bodies in relation to reception guarantees, for example with Institution for Social Welfare which is, when appropriate, included in the procedure for assessing special needs. In case adequate accommodation cannot be provided for those persons in the Reception Centre for Applicants for International Protection, a person would be accommodated in another appropriate institution or can be granted accommodation according to the social welfare regulations. Also, when needed, special dietary requirements will be provided based on the recommendation of the competent physician. Applicants accommodated in the

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<sup>512</sup> Article 56(6) LITP; Article 6(1) Ordinance on the Realisation of Material Reception Conditions.

<sup>513</sup> Article 7(3) Ordinance on the Realisation of Material Reception Conditions.

<sup>514</sup> Ombudswoman: Report of the Ombudswoman for 2024, page 269, available at: <https://www.ombudsman.hr/hr/download/izvje-e-pu-ke-pravobraniteljice-za-2024-godinu/?wpdmdl=20339&refresh=67efca50785f31743768144>.

<sup>515</sup> Article 12(1)-(3) Ordinance on the Realisation of Material Reception Conditions.

<sup>516</sup> Article 20(2) Ordinance on the Realisation of Material Reception Conditions.

<sup>517</sup> EUAA, Information on procedural elements and rights of applicants subject to a Dublin transfer to Croatia, available at: <https://bit.ly/3VLNPKc>.

Reception Centre are provided with three meals a day and pregnant women, babies and children under the age of 16 are provided with an afternoon snack. Upon recommendation of the doctor, separate accommodation would be provided to those with special reception needs. If needed, they would be provided with appropriate health care related to their specific health condition.<sup>518</sup>

In 2024, a total of 498 applicants for international protection were accommodated in social welfare institutions outside the Reception Centres for Applicants for International Protection.<sup>519</sup> However, the Croatian Red Cross pointed out that, due to the large number of applicants and their short stays in the reception centre in 2024, it was not possible to conduct initial interviews with beneficiaries in order to identify their needs and assess their physical and psychological condition.<sup>520</sup>

## 1. Reception of women and children

According to the Ordinance on the realisation of material reception conditions, when accommodating applicants in the Reception Centre, the following circumstances are taken into account: gender, age, the position of vulnerable groups, applicants with special reception needs and integrity of the family.<sup>521</sup>

Separate premises are provided in the Reception Centre in Kutina for women and vulnerable groups. Families are kept together,<sup>522</sup> while single women,<sup>523</sup> unaccompanied children<sup>524</sup> and traumatised applicants<sup>525</sup> are accommodated in separate rooms.

## 2. Reception of unaccompanied children

With regard to unaccompanied children, the LITP prescribes that the special guardian of the unaccompanied child shall undertake, as soon as possible after the application for international protection is submitted, all necessary actions to find the family members and reunite the child with the family, if that is in the child's interest, including contacting and cooperating with relevant ministries, other state and foreign bodies and NGOs. The special guardian must respect the principle of confidentiality when collecting, processing, and exchanging information about the child and family members so as not to jeopardise their safety.<sup>526</sup>

The child shall be provided with access to recreational activities, including age-appropriate play and recreational activities and outdoor activities.<sup>527</sup>

In practice, most unaccompanied foreign children up to now are placed in children and young people's homes. Children under 14 years of age are accommodated in children's homes, while children above the age of 14 are accommodated in Residential Child Care Institutions. Although these are open facilities, they are not adapted to the needs of this category of children.

According to data from the Ministry of the Interior for 2024, 1,455 unaccompanied children were accommodated in Reception centres for applicants for international protection, and 487 in social welfare institutions, which is a significant increase compared to 2023, when 1,113 unaccompanied children were accommodated in Reception centres for applicants for international protection and 374 in social welfare institutions.<sup>528</sup>

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<sup>518</sup> Information provided by the Ministry of Interior, 28 January 2019.

<sup>519</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).

<sup>520</sup> Information provided by the Croatian Red Cross, 20 January 2025.

<sup>521</sup> Article (6) 1 Ordinance on the realisation of material reception conditions.

<sup>522</sup> Article 11 Ordinance on the realisation of material reception conditions.

<sup>523</sup> Article 16 Ordinance on the realisation of material reception conditions.

<sup>524</sup> Article 15 Ordinance on the realisation of material reception conditions

<sup>525</sup> Article 12 Ordinance on the realisation of material reception conditions

<sup>526</sup> Article 10(3) – (4) LITP.

<sup>527</sup> Article 10(5) LITP.

<sup>528</sup> Ombudswoman for Children: *Report on the work of the Ombudswoman for Children in 2024*, page 199, available at: <https://dijete.hr/hr/download/izvjesce-o-radu-pravobraniteljice-za-djecu-za-2024-godinu/>.

According to the Ministry of Labour, Pension, Family and Social Policy, 891 unaccompanied children were accommodated in childcare institutions - 212 under the age of 14, and 679 aged 14 and over. Five unaccompanied children were accommodated in foster homes, while the remaining 54% were placed in a Reception Centres for Applicants for International Protection or were transferred to other countries in accordance with decisions of the Ministry of the Interior. Most unaccompanied children left childcare institutions voluntarily.<sup>529</sup>

The UNICEF Office in Croatia reported that in 2024 more than 30% of the children accommodated in the Reception Centres for Applicants for International Protection in Zagreb and Kutina were children aged 0 to 7. Despite being in the most intensive period of development, the majority of these children were excluded from early childhood education and care programmes. According to data obtained from the City of Zagreb, only one child was enrolled in a pre-school programme. This situation poses a significant risk to their development, especially considering their exposure to multiple migration-related stressors such as family separation, cultural shocks, and housing insecurity. These stressors may have long-term consequences on child development, including learning and socialisation difficulties, behavioural disorders, and the onset of mental health issues such as anxiety and depression. Additionally, many children in reception centres have parents or guardians who are themselves affected by the consequences of migration, which further complicates their integration into a new environment. The lack of adequate support for parents, the absence of professional services for children, and the lack of appropriate activities in reception centres further exacerbate the situation. UNICEF highlighted that there is an urgent need to ensure access to quality early childhood education and care services for all children in reception centres, including the provision of child-friendly activities and psychological support. To address the specific needs of children and their caregivers, UNICEF emphasises the importance of engaging professionals and ensuring access to mental health and psychosocial support services in accordance with the needs of both children and their parents/guardians. However, none of the service providers currently operating in the Reception Centres for Applicants for International Protection include professionals from this field in their teams.<sup>530</sup>

UNICEF highlights that the reception of unaccompanied children in Croatia still lacks a systematic approach aligned with the best interests and rights of the child, as the majority of unaccompanied children continue to be inappropriately accommodated within the social welfare system—in institutions for children with behavioural problems or in Reception Centres for Applicants for International Protection, alongside adult individuals.<sup>531</sup> The same was reported by the Centre for Missing and Exploited Children that highlighted the inappropriate accommodation for unaccompanied children, including placements in institutions for children without adequate parental care, homes for children with behavioral difficulties, or in reception centers for applicants for international protection; a shortage of foster families for unaccompanied children.<sup>532</sup>

The Ombudswoman for Children in her report for 2024 also once again warned about the inappropriateness of the accommodation of unaccompanied migrant children in Croatia. According to the data of the Ministry of Labor, Pension System, Family and Social Policy, during 2024, 891 unaccompanied children<sup>533</sup> were granted social accommodation services in crisis situations by social service providers, of which the largest number, as in the previous year, were placed in Community Service Center Zagreb-Dugave (299) and Community Service Center Ivanec (229). A significant number of children were also placed in Community Service Center Split (118) and Community Service Center Osijek (111). The number of children under the age of 14 placed in institutions for children without adequate parental care was 109, which is significantly more than in 2023, when 32 were accommodated in these institutions. It is worrying that in 2024, 212 children under the age of 13 were placed in social welfare institutions, while in 2023 there were 75, and in 2022 there were 29. Organizations involved in the reception and work with unaccompanied children, as well as employees of the institutions, continue to point to the inadequacy of such accommodation. Most institutions that accept unaccompanied children warn of a lack of spatial capacity, which causes difficulties in

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<sup>529</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf)

<sup>530</sup> Information provided by UNICEF Office for Croatia, 4 February 2025.

<sup>531</sup> Information provided by UNICEF Office for Croatia, 4 February 2025.

<sup>532</sup> Information provided by Centre for Missing and Exploited Children, 30 January 2025.

<sup>533</sup> The data applies not only to applicants for international protection.

maintaining an adequate level of care. The Ombudswoman stressed that migrant children come from a different cultural and linguistic background, and are often traumatized and exhausted by the long and uncertain journey. Therefore, the Ombudswoman highlighted that placing them in overcrowded institutions with children with behavioral problems is not an appropriate solution.

Such accommodation also presents a challenge for caregivers. In addition to the lack of adequate space and insufficient accompanying documentation (particularly concerning age assessment), delays in the issuance of decisions on accommodation by the competent regional offices of the Croatian Institute for Social Work create difficulties in providing personalized care and an individualised approach to each child. Institutions reported that almost none of the children possess documentation confirming their date of birth. Further challenges arise from cultural differences. Moreover, children under the age of 14 continue to be placed in such institutions, often during the night, after children's homes have refused to admit them. The language barrier remains a significant obstacle in daily work, and there have been occasional incidents of unacceptable behaviour, including damage to property and physical violence directed at other children in the institution as well as at staff members.<sup>534</sup>

As part of the program '*Support for Children and Families in Migration during the Process of Protection and Integration in Croatia*', coordinated by the UNICEF Office for Croatia, two intercultural mediators have been employed at the Community Service Center Zagreb – Dugave, working with unaccompanied children. A space has been equipped with furniture and didactic materials intended for unaccompanied children, and the training '*Living Diversity*' has been conducted for professionals working with unaccompanied children.<sup>535</sup>

The Croatian government designated two facilities for children in Zagreb and in Split for the initial reception of unaccompanied and separated children during which best interests' procedures are undertaken.<sup>536</sup> However, children are accepted in other social welfare institutions as well.

According to the Croatian Red Cross (CRC), during 2024, unaccompanied children who were accommodated in Reception Centres for Applicants for International Protection received the necessary support in the form of accommodation in rooms with other minors. Also, through initial interviews, they received all the necessary information on restoring family ties with the CRC's support and were referred to assistance and access to social and health services, education and legal aid.

During 2024, CRC's employees visited children's homes as needed and based on information received from the Ministry of Labor, Pension System, Family and Social Policy. Their services included psychosocial support and the restoration of family ties. Professional staff working there also received support from CRC's employees. However, the CRC's employees were often not aware of the placement of an unaccompanied child in a social welfare institution. A particular challenge during 2024 was that the period of stay of unaccompanied children was usually very short (1-3 days) as they left Croatia very quickly, so CRC employees were not able to provide all the necessary information to children.<sup>537</sup>

In 2024, the Croatian Red Cross mobile team carried out 33 visits to institutions accommodating unaccompanied minors, including reception centres for applicants for international protection, children's homes, and hospitals. An initial needs assessment was conducted with each child to gather information on their current situation, identify urgent needs, and explore ways to address their specific requirements. An individual assistance plan was developed for 68 unaccompanied minors, most of whom were from Egypt, Syria, and Afghanistan.

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<sup>534</sup> Ombudswoman for Children: *Report on the work of the Ombudswoman for Children in 2024*, page 201 and 202, available at: <https://dijete.hr/hr/download/izvjesce-o-radu-pravobraniteljice-za-djecu-za-2024-godinu/>.

<sup>535</sup> Ombudswoman for Children: *Report on the work of the Ombudswoman for Children in 2024*, page 201 and 207, available at: <https://dijete.hr/hr/download/izvjesce-o-radu-pravobraniteljice-za-djecu-za-2024-godinu/>.

<sup>536</sup> UNHCR; UNICEF and IOM: *Refugee and Migrant Children in Europe - Accompanied, Unaccompanied and Separated, Overview of Trends January to June 2020* available in English at: <https://bit.ly/32AD0OY>.

<sup>537</sup> Information provided by the Croatian Red Cross, 20 January 2025.



Cooperation was established with special guardians and professionals working in the institutions where the children were accommodated, with the aim of providing expert support in working with unaccompanied minors and assisting in addressing practical challenges, such as finding suitable accommodation, ensuring access to healthcare, providing appropriate clothing and hygiene items, facilitating family contact, and organising activities tailored to the children's interests and abilities.

Particular attention was given to educating unaccompanied minors on the risks of human trafficking and on protection and prevention measures during transit as well as in destination countries. When communication needed to be facilitated, the Croatian Red Cross provided interpreters. For each child requiring contact with their family, mobile phone vouchers and SIM cards were provided.

Separation from family, previous exposure to trauma, and placement in institutions alongside children with behavioural issues place unaccompanied children in an especially vulnerable position, which may affect their psychological well-being. Many also face prolonged periods of instability and uncertainty while awaiting the outcome of legal procedures, such as the granting of international protection status or family reunification. For this reason, individual psychosocial support was provided when needed, organised by the Croatian Red Cross mobile team.

In addition, various sports and social activities were organised, most often in cooperation with volunteers. In collaboration with the City Red Cross Branch in Karlovac, support was provided to unaccompanied minors accommodated in the Karlovac area. Group activities were organised for them, and assistance was provided in the case of one child being reunited with their brother.

A total of 16 professional support sessions were delivered to special guardians and staff of institutions accommodating unaccompanied children. These mostly included: interpretation assistance during administrative procedures and family reunification processes; support in the implementation and understanding of the Protocol on the Treatment of Unaccompanied Minors; development of individual plans for unaccompanied children; and similar tasks.

In cooperation with UNHCR, the Ministry of the Interior of the Republic of Croatia, and the Croatian Institute for Social Work – Novi Zagreb Regional Office, organised a training session for special guardians of unaccompanied minors in Split. The training was attended by 12 staff members from regional offices of the Croatian Institute for Social Work, the Community Services Centre Split, and the City Red Cross Branch Split.

Through regular communication with children's homes accommodating unaccompanied children, a need was identified for hygiene supplies, clothing and footwear, as well as materials for social activities. Consequently, the requested humanitarian aid was procured and distributed to the institutions that expressed the need.<sup>538</sup>

In 2024, UNHCR and the Office of the Children's Ombudsperson jointly visited two children's homes - in Ivanec and Slavonski Brod, where unaccompanied and separated children are accommodated upon interception by police. Increased arrivals and rapid onwards movement by unaccompanied and separated children continued in 2024, despite an overall decline in the numbers of applicants for international protection registered.<sup>539</sup>

In December 2024, UNHCR launched a study on care arrangements for unaccompanied and separated children in Croatia.<sup>540</sup> The study analysed the current system of providing protection and care for unaccompanied and separated children in Croatia, by evaluating both institutional and deinstitutionalized

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<sup>538</sup> Croatian Red Cross: Annual report on the work of the Croatian Red Cross in 2024, page 86, available at: [https://www.hck.hr/UserDocImages/vijesti/2025/AD%205\)%20Izvje%C5%A1%C4%87e%20o%20radu%20HCK%20u%202024.pdf?vel=5096156](https://www.hck.hr/UserDocImages/vijesti/2025/AD%205)%20Izvje%C5%A1%C4%87e%20o%20radu%20HCK%20u%202024.pdf?vel=5096156).

<sup>539</sup> Information provided by the UNHCR Office for Croatia, 18 March 2025.

<sup>540</sup> UNHCR: Care arrangements for unaccompanied and separated children in Croatia, A study by Drago Župarić-Ilić, PhD, for UNHCR; available at: <https://www.unhcr.org/hr/wp-content/uploads/sites/19/2024/12/UNHCR-Skrb-o-djeci-bez-pratnje-u-RH.pdf>.

solutions for initial reception and subsequent placement. Based on research and interviews with a wide range of stakeholders, the study highlights the experiences of children and carers and offers recommendations to improve current care arrangements, primarily through the strengthening of inclusive family-based and community-based alternative care arrangements, such as foster families equipped to receive unaccompanied and separated children and supervised group living arrangements for older children.<sup>541</sup>

In 2024, UNICEF Office for Croatia was regularly present at the Community Service Centre Zagreb-Dugave, which is an implementing partner in the implementation of the programme "*Supporting Children and Families in Migration in the Protection and Integration Process in Croatia*".

In October 2024, UNICEF Office for Croatia visited the Community Service Centre Split, which also accommodates unaccompanied children. The UNICEF Office for Croatia and the UNICEF Office for Bosnia and Herzegovina organized a visit to the Borići Migrant Reception Center in Bihać in Bosnia and Herzegovina. The Borići Reception Centre is intended for the reception of vulnerable groups, including unaccompanied children. The visit was organized with the aim of gaining a deeper insight into migration and refugee policies and protection practices implemented in both countries – Croatia and Bosnia and Herzegovina, and facilitating networking opportunities with child protection experts, experts and stakeholders between Croatia and Bosnia and Herzegovina. The visit included a representative of the Croatian Ministry of Labor, Pension System, Family and Social Policy, experts from the regional offices of the Croatian Institute for Social Work in the areas where a large number of unaccompanied children are found and who perform the tasks of special guardians (Novi Zagreb, Slunj and Dugo Selo), and a representative of the Center for Community Service Provision Zagreb-Dugave. Formal meetings were also held with Bosnian representatives of the Center for Social Work Bih, the Service for Foreigners' Affairs and IOM.<sup>542</sup>

A Protocol on the treatment of unaccompanied children was adopted in August 2018 (see [Identification](#)) which foresees the possibility of accommodation with foster families.

On 1 January 2019, the new Law on Foster Care entered into force, which provides for the possibility for unaccompanied children to stay in a foster family.<sup>543</sup> According to the Ombudsperson for Children, this possibility was not used in 2020,<sup>544</sup> while in 2021, 3 unaccompanied children were placed in foster families.<sup>545</sup> In 2022, only one accommodation in foster family took place.<sup>546</sup> According to the Ministry of Interior, there were no unaccompanied children staying with foster families in 2023.<sup>547</sup> In 2024, five unaccompanied minors were placed in foster families, all of whom were under the age of seven. Although the number is still low, it indicates a positive shift towards placing and caring for children in a family environment. When issuing a decision on the approval to provide foster care, the applicant may express an interest in accommodating an unaccompanied child, in which case additional training is provided. Currently, only one foster carer has expressed interest in future fostering of unaccompanied minors. The specific needs and vulnerabilities of unaccompanied children who come from different cultural backgrounds, the language barrier, and the lack of interpreters make the placement of unaccompanied minors in foster families more difficult. Therefore, strengthening support programmes for foster carers and children in foster families is encouraged by the Ombudswoman for Children in order to promote interest in fostering unaccompanied minors.<sup>548</sup>

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<sup>541</sup> Information provided by the UNHCR Office for Croatia, 18 March 2025.

<sup>542</sup> Information provided by UNICEF Office for Croatia, 4 February 2025.

<sup>543</sup> Official Gazette 115/18, amendment Official Gazette 18/22

<sup>544</sup> Ombudsperson for Children: *Report on the work of the Ombudsman for Children in 2020*, March 2021, available online as of 7 April 2021 at: <https://bit.ly/32B5hEQ>.

<sup>545</sup> It is not clear whether they were applicants for international protection. Ombudsperson for Children: *Report on the work of the Ombudsman for Children in 2021*, available in Croatian: <https://bit.ly/3jonKNp>.

<sup>546</sup> Ombudswoman for children report for 2022, available in Croatian at: <https://bit.ly/43C5ZPL>.

<sup>547</sup> Information provided by the Ministry of Interior, 8 March 2024.

<sup>548</sup> Ombudswoman for Children: *Report on the work of the Ombudswoman for Children in 2024*, page 204, available at: <https://dijete.hr/hr/download/izvjesce-o-radu-pravobraniteljice-za-djecu-za-2024-godinu/>.

In 2024, UNICEF conducted an Analytical Assessment of the Adequacy of Foster Care Allowances for Children in Foster Families, as well as the package of compensations, leave entitlements, and other social benefits for foster carers in Croatia. The assessment also took into account the specific needs of unaccompanied children and the fostering of unaccompanied minors. Based on the findings, one of the recommendations to the Ministry of Labour, Pension System, Family and Social Policy was to adjust the amount of the foster care allowance in order to adequately address the high additional costs associated with unaccompanied children in foster families.<sup>549</sup>

In 2024, there were 1,980 unaccompanied children that expressed their intention to apply for international protection (i.e., that made applications), of which 1,914 were boys and 66 girls.<sup>550</sup>

However, according to the Ombudsperson for Children, in 2024, unaccompanied children most often do not wait for a decision on their application for international protection, mainly because Croatia is a transit point on their journey.

International protection was granted to 41 children, one of whom 1 to an unaccompanied child. Regardless of the year in which the application was made, in 2024, the Ministry of the Interior, issued 718 decisions for unaccompanied children, most of which (704) were issued due to suspension of procedure, 10 applications were dismissed, and for three children the application was rejected. The reasons for the suspension of the procedures in the majority of cases was a failure to respond to the invitation to a interview. Two lawsuits were filed against the decisions of the Ministry of the Interior.<sup>551</sup>

### 3. Reception of victims of torture, violence and trauma

No system for early identification of victims of torture or other forms of ill-treatment by competent authorities and professionals has yet been developed according to the knowledge of Croatian Law Centre. According to the LITP, applicants who need special reception and/or procedural guarantees, especially victims of torture, rape or other serious forms of psychological, physical or sexual violence, shall be provided with the appropriate health care related to their specific condition or the consequences resulting from the mentioned acts.<sup>552</sup> When accommodating applicants in the Reception Centre, special attention shall be paid to gender, age, the situation of vulnerable groups, applicants with special reception needs, and family unity.<sup>553</sup> In 2020, the Ordinance on health care standards for applicants for international protection and foreigners under temporary protection entered into force regulating, amongst other, the scope of health care for vulnerable groups.<sup>554</sup> This is discussed in detail in the section on [Health Care](#).

Standard Operational Procedures in Cases of Sexual and Gender-Based Violence in the Reception Centres for Applicants of International Protection entered into force in 2021.

## F. Information for asylum applicants and access to reception centres

### 1. Provision of information on reception

There are no specific rules for information to be provided to applicants on rights and obligations relating to reception conditions. According to the provisions of the LITP, the Ministry of Interior has to inform the applicants in writing within 15 days of the expression of intention, about the procedure of approval of international protection, about rights and obligations they have in that procedure, the possibility of contact representatives of UNHCR and other organisations who work to protect the rights of refugees, and the possibility of receiving free legal assistance. If the information cannot be provided in writing for justified

<sup>549</sup> Information provided by UNICEF Office for Croatia, 4 February 2025.

<sup>550</sup> Ministry of Interior, Statistics for 2024, available at: <https://mup.gov.hr/UserDocsImages/statistika/2025/1/Statistika%20medjunarodna%20zastita%202024.xlsx>.

<sup>551</sup> Ombudswoman for Children, *Report on the work of the Ombudswoman for Children in 2024*, available in Croatian at: <https://dijete.hr/hr/download/izvjesce-o-radu-pravobraniteljice-za-djecu-za-2024-godinu/>.

<sup>552</sup> Article 57(2) LITP.

<sup>553</sup> Article 56(6) LITP.

<sup>554</sup> Official Gazette 28/2020, 13 March 2020, available in Croatia at: <https://bit.ly/2PcZGBM>.

reasons or if the applicant is illiterate, the information shall be provided orally in a language reasonably supposed to be understood by the applicant and in which applicant is able to communicate.<sup>555</sup>

In practice, according to the information available to the Croatian Law Centre, this information is given in during the submission of the application for international protection.

Upon their arrival in the Reception Centre, applicants are also informed by social workers and psychologists of the Croatian Red Cross about their rights and obligations, the House Rules and rules of conduct which must be adhered to while accommodated in the Reception Centre as well as other practical information, e.g., the daily schedule of the distribution of linen, clothing and footwear, and hygiene items, laundry services, information on daily creative workshops and other activities available in the centre.

In 2020, the Centre for cultural activities prepared 6 videos containing the necessary information for applicants for international protection and foreigners residing in Croatia within the project “The video info corner for asylum seekers” which was implemented with the financial support of the Ministry of Labour, Pension System, Family and Social Policy. The videos provide general information<sup>556</sup> as well as information on legal counselling, accommodation and daily life,<sup>557</sup> health care,<sup>558</sup> education,<sup>559</sup> obligation to respect the legal framework and customs of the Republic of Croatia,<sup>560</sup> and cultural features in the local community.<sup>561</sup> The videos were made with English subtitles and synchronised to Arabic.

## 2. Access to reception centres by third parties

### Indicators: Access to Reception Centres

1. Do family members, legal advisers, UNHCR and/or NGOs have access to reception centres?  
☒ Yes ☐ With limitations ☐ No

Amendments to the LITP in 2023 introduced specific provisions on the access of third parties to the Reception Centres for Applicants for International Protection. According to LITP, applicants accommodated in the Reception Center shall be provided with an adequate space for meeting and communicating with family members and relatives, legal or other counsellors, representatives of the UNHCR, and other national, international and non-governmental organisations and bodies. Access to applicants may be temporarily restricted due to serious health or safety reasons.<sup>562</sup>

Additionally, both Reception Centres are open facilities and applicants may leave the centre according to the house rules and are able to meet anyone outside. According to the LITP, the Croatian Red Cross, UNHCR and other organisations involved in the protection of refugee rights or doing humanitarian work, may conduct pedagogical, educational and similar activities and provide other types of assistance at the reception centres, subject to prior authorisation by the Ministry of Interior.<sup>563</sup>

The employees of the Croatian Red Cross are present in both Reception Centres for Applicants for International Protection.

In practice, access to the centres by UNHCR and other relevant NGOs did not constitute an issue in the past. In 2020, due to COVID-19 preventive measures, access to the reception centres was restricted for persons who are not necessary for the normal functioning of the facilities.<sup>564</sup>

<sup>555</sup> Article 59(2)-(3) LITP.

<sup>556</sup> The video is available at: <https://bit.ly/3awCMN4>.

<sup>557</sup> The video is available at: <https://cutt.ly/qvKPaQo>.

<sup>558</sup> The video is available at: <https://cutt.ly/6vKPjJp>.

<sup>559</sup> The video is available at: <https://cutt.ly/YvKPcY4>.

<sup>560</sup> The video is available at: <https://cutt.ly/YvKPQut>.

<sup>561</sup> The video is available at: <https://cutt.ly/6vKPTPm>.

<sup>562</sup> Article 56 (3) – (4) LITP.

<sup>563</sup> Article 56 (2) LITP.

<sup>564</sup> EMN, *Special Annex to the 30th EMN Bulletin EU Member States & Norway: responses to COVID-19 in the migration and asylum area, January – March 2020*, available at: <https://bit.ly/45wulwH>.

As of mid-March 2020, until the end of 2024, access to Reception centres for applicants for international protection remained restricted, with the exception of persons who ensure the normal functioning of the facilities i.e., only employees of the Ministry of Interior, the Croatian Red Cross and Médecins du Monde (Doctors of the World - MdM) could access the facilities on the daily bases.

#### **G. Differential treatment of specific nationalities in reception**

There is no difference in treatment with respect to reception based on nationality.

## Detention of Asylum Seekers

### A. General

#### Indicators: General Information on Detention

1. Total number of asylum applicants detained in 2024: <sup>565</sup>	52 <sup>566</sup>
2. Number of asylum applicants in detention at the end of 2024:	N/A
3. Number of detention centres:	3
4. Total capacity of detention centres:	N/A

During the procedure for international protection, detention is possible under all types of procedures, where the conditions prescribed by the LITP are met. However, the majority of applicants for international protection are not detained but are accommodated in open centres. In that sense, it is not likely that any category of applicants would spend the whole status determination procedure in detention. The main reasons for the detention of applicants are situations where they request international protection after having been issued with a deportation order and situations where they left or attempted to leave Croatia before the completion of the procedure for international protection.

Croatia has three detention centres: the Reception Centre for Foreigners located in **Ježevo**, with a total capacity of 95 places; the Transit Reception Centre in **Trilj** with a total capacity of 62 places; and the Transit Reception Centre in **Tovarnik** with a total capacity of 62 places.<sup>567</sup> This brings the total capacity of detention centres to 219 according to information provided by the Ministry of Interior in 2019. No information is available on whether this has changed in the period from 2020 until the end of 2024.

The UNICEF Office in Croatia reported that in 2024, a significant increase was observed in the total number of children<sup>568</sup> accommodated in the Reception Centre Ježevo and the Transit Reception Centres in Tovarnik and Trilj during the first nine months of the year (230 children, 43% girls), representing an increase of nearly 30% compared to 2023 (179 children, 39% girls). The largest number of children was accommodated in the Transit Centre in Tovarnik (145 children, or 63%). UNICEF highlighted particular concern over the fact that in 2024, the highest number of children under the age of seven (90 children, or 39%) were accommodated in the Reception Centre Ježevo and the Transit Centres in Tovarnik and Trilj, compared to other age groups. However, when analysing the data by individual centre, only the Reception Centre Ježevo saw a decrease in the number of children accommodated during the first nine months of 2024 (21 children, of whom 38% were girls), compared to 2023 (73 children, of whom 34% were girls).<sup>569</sup>

According to the data of the Ministry of Interior, irregular border crossings decreased in 2024 (i.e., there were 29,294 irregular border crossings recorded). The greatest pressure regarding the irregular border crossings was recorded in the area of the Brodsko-posavska Police administration. Namely, out of the total number of actions related to irregular crossings, 7,647 were recorded in the area of Brodsko-posavska Police Administration.<sup>570</sup>

The Centre in Dugi Dol was opened at the end of 2023, with a capacity to accommodate a maximum of 500 applicants for international protection. It was established due to the increased number of applicants in that area in previous years, in order to conduct the registration of applicants, who would then be sent either

<sup>565</sup> Including *both* applicants detained in the course of the asylum procedure and persons lodging an application from detention.

<sup>566</sup> The number refers only to decisions issued by the Service for Reception and Accommodation of Applicants for International Protection. However, data on decisions on the restriction of freedom issued by police administrations or stations are not available so it is therefore not possible to determine the total number of applicants for international protection whose freedom of movement was restricted with the measure of detention in 2024.

<sup>567</sup> Information provided by the Ministry of Interior, Border Directorate, 6 February 2019.

<sup>568</sup> The figures do not refer exclusively to children seeking international protection.

<sup>569</sup> Information provided by UNICEF Office for Croatia, 4 February 2025.

<sup>570</sup> Ministry of Interior, Statistical overview of the fundamental safety indicators and work results in 2024, page 158, available at: [https://mup.gov.hr/UserDocsImages/statistika/2025/statistika%20za%202024%20hrv%20i%20eng/Statisticki\\_pregled\\_2024\\_web.pdf](https://mup.gov.hr/UserDocsImages/statistika/2025/statistika%20za%202024%20hrv%20i%20eng/Statisticki_pregled_2024_web.pdf).



to reception centres for international protection applicants or, based on the assessment, to reception centres for foreigners. The establishment of the Centre aimed to relieve the police (border) stations in the area, as they did not have sufficient capacity to handle the increased number of applicants.

During a visit of the Ombudswoman's employees in 2024, under the role of the National Preventive Mechanism (NPM), the NPM representatives were not granted full access to all relevant data, as there were no police officers authorized to provide such data at the Centre. As a result, the NPM representatives had a telephone conversation on-site with the competent person, who informed them about the operations of the Centre. However, even through the phone conversation, the necessary data could not be gathered, as the Centre did not maintain special records regarding the treatment of detained persons. Therefore, data on the number of persons, as well as their demographic structure (such as age, gender, nationality, etc.), were not available. Records of the time of arrival and release from the Centre were also not kept. According to the police officer, the Centre only recorded data regarding the registration of the intention to submit an application for international protection, took statements about the personal data of foreigners, and compiled an official note on inspections and seizures of items. All other data about persons detained in the Centre are maintained by the police station at the location where a person was found through an event log, physical objects, and relevant records.

The Ombudswoman highlighted that the main mechanism of protection in cases of deprivation of liberty is the maintenance of a unique and comprehensive record that includes all aspects of the individual's stay (i.e., the deprivation of liberty, as well as all actions taken in connection with it). The lack of such records hinders the ability to control operations and oversee the treatment of detained persons.

Considering the nature and possible duration of detention, as well as the fact that families with children and other vulnerable groups are detained at the Centre, the material conditions for accommodating individuals were inadequate. The containers were equipped only with bunk beds without mattresses or bedding, there were no showers or hot water in the Centre, and only chemical toilets were available.

It is particularly concerning that, during the visit, the length of stay of the applicants in the Centre could not be determined. Furthermore, in the Centre, which is designed to accommodate up to 500 individuals, the registration process for six individuals who were found during the NPM visit was not initiated within a period longer than 12 hours. Therefore, after the visit, the NPM representatives alerted the Ministry of the Interior that the accommodation conditions must be brought into line with the CPT standards (providing sufficient space, mattresses, bedding, access to sanitary facilities, showers, hot water, etc.), and that the NPM representatives, in accordance with Article 5 of the Law on National Preventive Mechanism and Article 20 of the Optional Protocol to the Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, should be granted full access to all requested data regardless of their storage method. Additionally, for the applicants detained at the Centre, the legal grounds for their detention need to be clearly established, along with the maximum possible period of detention in the Centre, and all guarantees should be provided in accordance with international standards.<sup>571</sup>

According to some announcements, the Centre in Dugi Dol should expand its capacities by mid-2025, increasing the accommodation capacities from 500 to 1,500 people. The centre, which until now served for short-term accommodation of migrants for up to 24 hours, will in the future allow for a longer stay, from seven days to a maximum of 12 weeks. During this period, a detailed check (i.e. screening) will be carried out.<sup>572</sup>

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<sup>571</sup> Ombudswoman: Report of the Ombudswoman for 2024, page 276-277, available at: <https://www.ombudsman.hr/hr/download/izvje-e-pu-ke-pravobraniteljice-za-2024-godinu/?wpdmdl=20339&refresh=67efca50785f31743768144/>.

<sup>572</sup> Tanja Kuturovac "The center for migrants in Dugi Dol is expanding its capacities and introducing new functions" (HRT, 22 November 2024.) available at: <https://vijesti.hrt.hr/hrvatska/centar-za-migrante-u-dugom-dolu-siri-kapacitete-i-uvodi-nove-funkcije-11873430>.

During 2024, 90 persons expressed their intention to apply for international protection in the Reception Center for Foreigners, 34 in the Transit Reception Center for Foreigners Tovarnik, and 71 persons in the Transit Reception Center Trilj.<sup>573</sup>

In 2024, the Service for the Reception and Accommodation of Applicants for International Protection issued 11% more decisions restricting freedom of movement compared to 2023 (i.e., issued 52 decisions on restriction of the freedom of movement, through the measure of detention). This included 50 decisions on detention in the Reception Centre for Foreigners in Ježevo, while two applicants were detained in Transit Reception Centre for Foreigners in Trilj. Among applicants detained, 94% were male (2 boys and 47 men) and 4% were female (3 women).

Data on decisions on the restriction of freedom issued by police administrations or stations are not available, so it was not possible to determine the total number of applicants for international protection whose right to freedom of movement was restricted in 2024. In March 2024, the Ministry of Interior reported that they do not keep records on the average duration of the restrictions on the freedom of movement at the Reception Centres for Foreigners. Measures for the restriction of freedom of movement are imposed as long as reasons listed in Article 54 paragraph 2 of the LITP exist, and so for up to 3 months. Exceptionally, for justified reasons, measures may be extended for a maximum of three additional months.<sup>574</sup>

The [UN Subcommittee on Prevention of Torture](#) (SPT) visited Croatia for the first time from 2 to 8 July 2023 to assess the treatment of people deprived of their liberty and the safeguards in place to protect them from torture and ill-treatment. The SPT visited various places of deprivation of liberty, including, police stations and migration centres.<sup>575</sup>

In the report for 2024, the Ombudsman for Children stated that in 2024, in the Reception Center for Foreigners in Ježevo, 19 children were accommodated accompanied by their families, while two were unaccompanied. 16 children were readmitted to Bosnia and Herzegovina, two were returned to their country of origin, two were placed in the social care institution, and one child expressed the intention to submit an application for international protection and was accommodated in the Reception Center for Applicants for International Protection in Zagreb. There was also a significant increase in the number of children compared to 2023 in the Transit Reception Center for Foreigners in Tovarnik, where there were 150 children, of which 129 children with families and 21 unaccompanied children. 95 of them were returned to Bosnia and Herzegovina, 10 to Serbia, five were returned to their country of origin, and the rest (40 of them) expressed the intention to submit an application for international protection. In parallel, in 2023, the Center in Tovarnik accommodated 65 children with their families, nine unaccompanied children and eight children with special guardians. The Transit Reception Center for Foreigners in Trilj accommodated twice as many children as in 2023, namely 76 with their families and five unaccompanied children. 51 of them were returned to Bosnia and Herzegovina, two to their country of origin, five were placed in a social welfare institution, and 22 of them were accommodated in the Reception Center for Applicants International Protection in Zagreb as they expressed intention to seek international protection. In 2023, the Center in Trilj accommodated 40 children accompanied by their families and three unaccompanied children.<sup>576</sup>

In her 2024 report, the Ombudswoman stated that migrants and their attorneys had contacted her office with complaints about being denied access to the international protection system in reception centers for foreigners. One migrant, held in a center, reported that he feared returning to his country of origin due to potential human rights violations. He claimed that he requested asylum while at the center, but that police officers ignored his intention. Another migrant stated that he had expressed intention to apply for international protection to the police officers at the center, but they failed to register it and instead beat him.

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<sup>573</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).

<sup>574</sup> Information provided by the Ministry of Interior, 8 March 2024.

<sup>575</sup> UN Human Rights, Office of the High Commissioner. Croatia's detention facilities in spotlight as UN torture prevention body concludes visit, available at: <https://bit.ly/3VvHa5v>.

Fearing further violence, he signed a document in which he renounced his intention for international protection. Both migrants were only granted access to the asylum procedure after contacting a lawyer and/or the Ombudswoman.<sup>577</sup>

In 2024, a case related to extradition detention was declared inadmissible by the ECtHR.<sup>578</sup> The applicant, who had been arrested in Türkiye on terrorism-related charges linked to the activities of the Kurdistan Workers' Party (PKK), was held in extradition detention in Croatia pending extradition to Türkiye pursuant to an international arrest warrant, even though he had previously been granted refugee status in Switzerland. He pursued legal proceedings before Croatian courts to challenge his extradition, but the courts initially approved the extradition. However, the Constitutional Court overturned the domestic courts' decisions, stating that, following the applicant's recognition as a refugee in Switzerland, he enjoyed protection within the territory of European Union Member States under the rules of the Dublin Regulation. It found that extradition would violate the principle of *non-refoulement*. Following the Constitutional Court's decision, the domestic courts rejected the request for the applicant's extradition and, in July 2018, released him from extradition detention after 372 days of detention. In December 2023, the County Court in Vukovar fully granted the claim for reimbursement of the applicant's legal representation costs in the extradition proceedings. Meanwhile, the Zagreb Municipal Civil Court ruled that the unjust deprivation of liberty constituted a serious violation of the applicant's rights and awarded him 12,400 EUR for non-pecuniary damages. Before the ECtHR, the applicant complained under Article 5 of the Convention of unjustified detention in extradition custody with the intention of extraditing him to Türkiye, despite the domestic authorities being informed from the beginning about his refugee status in Switzerland; under Article 6 of the Convention regarding the failure of the domestic court to decide on his request for reimbursement of legal costs; and under Article 3 of the Convention that the unjustified deprivation of liberty caused him mental suffering. Regarding Article 5 of the Convention, the ECtHR stated that the complaint was premature, since the domestic court had awarded the applicant 12,400 EUR for non-pecuniary damage, found that the competent authorities had failed to properly consider his refugee status when deciding on the extradition request, and acknowledged that the extradition detention had caused him mental suffering. Given that the appeal proceedings are still ongoing, the ECtHR concluded that there is no reason to doubt that the national courts, including the Constitutional Court if necessary, will address the matter in accordance with the relevant criteria of the ECtHR, and therefore rejected this part of the application under Article 35 of the Convention. Furthermore, examining the alleged violation of Article 6 of the Convention, the ECtHR noted that the competent County Court in Vukovar had fully decided on the applicant's request for reimbursement of legal costs in the extradition proceedings, and that the applicant had not exhausted domestic remedies concerning the excessive length of the proceedings. Therefore, the ECtHR also rejected this part of the application under Article 35 of the Convention. Finally, considering the applicant's complaint under Article 3 of the Convention, the ECtHR observed that, in the civil proceedings, the applicant sought compensation for non-pecuniary damages relying on previously presented arguments. Since those proceedings are still pending before the second-instance court, the ECtHR also rejected this complaint as premature under Article 35 of the Convention.

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<sup>577</sup> Ombudswoman: Report of the Ombudswoman for 2024, page 271, available at: <https://www.ombudsman.hr/hr/download/izvje-e-pu-ke-pravobraniteljice-za-2024-godinu/?wpdmdl=20339&refresh=67efca50785f31743768144/>.

<sup>578</sup> ECtHR: DECISION Application no. 3745/18; *N.O. against Croatia*; available at: <https://hudoc.echr.coe.int/fre#%7B%22itemid%22%3A%22001-234056%22%7D>.

## B. Legal framework of detention

### 1. Grounds for detention

#### Indicators: Grounds for Detention

- |  |   |  |                                |
|--|---|--|--------------------------------|
| 1. In practice, are most detained asylum seekers held:                     |   |  |                                |
| ❖ on the territory:  | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No                |                                |
| ❖ at the border:   | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No     |                                |
| 2. Are asylum applicants detained in practice during the Dublin procedure? | <input type="checkbox"/> Frequently     | <input checked="" type="checkbox"/> Rarely | <input type="checkbox"/> Never |
| 3. Are asylum applicants detained during a regular procedure in practice?  | <input type="checkbox"/> Frequently     | <input checked="" type="checkbox"/> Rarely | <input type="checkbox"/> Never |

The LITP lays down the grounds for restricting the freedom of movement of applicants and foreigners under transfer, including through detention in a Reception Centre for Foreigners.<sup>579</sup> 2023 amendments to the LITP introduced new grounds for applying restrictions on the movement of applicants, thus making the law stricter in this respect. Detention may be ordered for seven reasons,<sup>580</sup> if it is established by individual assessment that other measures (see section on [Alternatives to Detention](#)) would not achieve the purpose of restriction of freedom of movement:

1. establishing the facts and circumstances on which the application for international protection is based, and that cannot be established without the restriction of movement, especially if it is assessed that there is a risk of absconding;
2. establishing and verifying identity or nationality;
3. protection of the national security or public order of the Republic of Croatia;
4. in order to prevent the spread of infectious diseases in accordance with national regulations on necessary epidemiological measures;
5. to prevent endangering the life of persons and property;
6. due to multiple consecutive attempts to leave the Republic of Croatia during the procedure for international protection;
7. due to the implementation of the procedure for forced removal, if based on objective circumstances, taking into account that the applicant already had the possibility of starting the procedure for international protection, it is justifiably assumed that by seeking international protection applicant wants to delay or make difficult to execute the decision on expulsion and/or return made in accordance with the provisions of the Law on foreigners.

In practice, however, detention is not used systematically.

Moreover, Article 54 (3) explicitly provides for the possibility to restrict freedom of movement or detain a foreigner for the purposes of transfer to another Member State under the Dublin Regulation only in cases where there is a “risk of absconding”. However, it should be noted that the LITP does not refer to a “*significant* risk of absconding” in accordance with Article 28(2) of the Dublin III Regulation.

The existence of a “risk of absconding” is determined on the basis of all the facts and circumstances of the concrete case, especially with regard to:<sup>581</sup>

- ❖ Previous attempts to arbitrarily leave Republic of Croatia;
- ❖ Refusal to submit to verification and establishment of identity;
- ❖ Concealing or providing false information on the identity and/or nationality;
- ❖ Violation of the reception centre’s house rules;
- ❖ A Eurodac ‘hit’; and
- ❖ Opposition to a Dublin transfer.

<sup>579</sup> Article 54(5) LITP.

<sup>580</sup> Article 54(2) LITP.

<sup>581</sup> Article 54(4) LITP.

As for the legal basis for for detention in 2024, for 31 applicants for international protection, freedom of movement was restricted on the basis of Article 54, para 2. item 7 of the LITP (due to the implementation of the procedure for forced removal, if based on objective circumstances, taking into account that the applicant already had the possibility of starting the procedure for international protection, it is justifiably assumed that by seeking international protection, the applicant wants to delay or make difficult to execute the decision on expulsion and/or return made in accordance with the provisions of the Law on foreigners), for 11 applicants freedom of movement was restricted on the basis of Article 54 para 2 item 3 of the LITP (protection of national security or public order), for 5 on the basis of Article 54 para 2 item 5 of the LITP (prevention of endangering people's lives and property), for 3 on the basis of Article 54 para 2 item 2 (establishment and verification of identity and nationality), and for 2 on the basis of Article 54 para 2 item 1 of the of LITP (to establish the facts and circumstances underlying the application for international protection, which cannot be determined without restricting movement, particularly if there is an assessed risk of absconding).<sup>582</sup>

In practice, however, detention is rarely used during the Dublin procedure. According to the Ministry of Interior, detention was used in two cases during the Dublin procedure in the course of 2018.<sup>583</sup> In 2021, this option was used in only one case, and the person was detained in the Reception Centre for Foreigners.<sup>584</sup> No public information on detention during the Dublin procedure is available for 2022.

According to the Ministry of Interior, in 2023, detention was not used during the Dublin procedure.<sup>585</sup> No information is available for 2024.

The LITP specifies that detention in Reception Centre for Foreigners may be imposed if, by individual assessment, it is established that other measures would not achieve the purpose of restriction of freedom of movement.<sup>586</sup> However, attorneys at law reported that decisions on the restriction of freedom of movement do not contain a thorough and reasoned individual assessment.<sup>587</sup>

According to information provided by the Ministry of Interior in 2017, the individual assessment requested for the purpose of the restriction of freedom of movement is done based on personal circumstances such as belonging to vulnerable group (unaccompanied child, person with disability, health problems, family relations) as well as based on the behaviour of the applicant for international protection and their attitude towards the House Rules of the Reception Centre for Applicants for International Protection.<sup>588</sup>

In practice in the course of 2024 majority of applicants detained (i.e., 31 applicants) were detained because they requested international protection after having been issued with a deportation order.

Where a person expresses the intention to apply for international protection from the detention centre, after having been detained on the basis of one of the immigration detention grounds as specified by the Law on foreigners in the Reception Centre for Foreigners, they must either be released and transferred to an open centre (**Zagreb** or **Kutina**) or must be served with a new restriction of freedom of movement decision on one of the grounds for detention as specified by LITP. According to information from the Border Police Directorate in 2018, if the intention is expressed in the Reception Centre for Foreigners in **Ježevo**, the intention is then received by the centre, which then informs by email the service dealing with applicants for

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<sup>582</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).

<sup>583</sup> Information provided by the Ministry of Interior, 28 January 2019. See also, Croatian Law Centre: "The Croatian Asylum System in 2021 – National Report". The report was prepared as part of the project "Access to the territory and the asylum system in Croatia – Legal support and capacity building" with the financial support of UNHCR, available in Croatian at: <https://bit.ly/3NgBDfc> and in English at: <https://bit.ly/3NBvVpC>.

<sup>584</sup> Croatian Law Centre: "The Croatian Asylum System in 2021 – National Report". The report was prepared as part of the project "Access to the territory and the asylum system in Croatia – Legal support and capacity building" with the financial support of UNHCR, available in Croatian at: <https://bit.ly/3NgBDfc> and in English at: <https://bit.ly/3NBvVpC>

<sup>585</sup> Information provided by the Ministry of Interior, 8 March 2024.

<sup>586</sup> Article 54(6) LITP.

<sup>587</sup> Information provided by attorneys at law, 19, 21 and 31 January 2025.

<sup>588</sup> Information provided by the Ministry of Interior, 2 March 2017.

international protection about the intention to seek international protection. The Service for Reception and accommodation of applicants for international protection organises the lodging of the application for international protection on the first following working day and, depending on the assessment, issues the decision on the restriction of freedom of movement, i.e., a detention order. If the decision on the restriction of freedom of movement is not issued, the applicant would be moved to the Reception Centre for Applicants for International Protection. Intentions to apply for international protection that are expressed in the Transit Reception Centres in **Trilj** and **Tovarnik** are received by local police stations based on their territorial jurisdiction.<sup>589</sup> However no new information is available since 2018.

In 2024, persons detained in the Reception Centre for Foreigners contacted the Centre for Peace Studies (CPS) on several occasions, and declared not being able to access the asylum system. Only after CPS' intervention were these people registered as applicants for international protection.<sup>590</sup>

## 2. Alternatives to detention

### Indicators: Alternatives to Detention

1. Which alternatives to detention have been laid down in the law?
  - ☒ Reporting duties
  - ☒ Surrendering documents
  - ☐ Financial guarantee
  - ☒ Residence restrictions
  - ☐ Other
2. Are alternatives to detention used in practice?
  - ☒ Yes ☐ No

During 2024, no decision was issued on the restriction of movement that would determine an alternative measure.

The same authority, i.e., the Ministry of Interior, the police administration or the police station can decide and issue decisions on a particular alternative measure and its duration.<sup>591</sup>

Article 54(6) LITP explicitly states that detention is only permissible where less coercive alternatives cannot be applied i.e., when it was established by individual assessment, that other measures could not achieve the purpose of the restriction of freedom of movement.

The alternatives to detention are the other measures listed in Article 54(5) LITP for the restriction of applicants' freedom of movement:

- (1) Prohibition of movement outside the Reception Centre for Applicants for International Protection;
- (2) Prohibition of movement outside a specific area;
- (3) Appearance in person at the Reception Centre for Applicants for International Protection at a specific time;
- (4) Handing over travel documents or tickets for deposit at the Reception Centre for Applicants for International Protection;

In 2024, alternative measures in cases in which the Service for the Reception and Accommodation of Applicants for International Protection brought decisions were not applied.<sup>592</sup>

According to the Ministry of Interior, in practice, by individual assessment of the specific case, applicant will be restricted by less coercive measures first, and only if necessary by the measure of detention. Depending on the individual assessment of the specific case, taking into consideration all relevant facts regarding the explicit reason for restriction of the freedom of movement that is stated in the LITP, a written administrative

<sup>589</sup> Information provided by the Ministry of Interior, Border Directorate, 17 August 2018.

<sup>590</sup> Information provided by Centre for Peace Studies, 27 February 2025.

<sup>591</sup> Article 54(11) LITP.

<sup>592</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).



decision with less coercive measure is issued. If this does not accomplish the purpose of restriction, then a new written decision with more coercive measures will be issued.<sup>593</sup>

### 3. Detention of vulnerable applicants

#### Indicators: Detention of Vulnerable Applicants

1. Are unaccompanied asylum-seeking children detained in practice? ☐ Frequently ☒ Rarely ☐ Never  
 ❖ If frequently or rarely, are they only detained in border/transit zones? ☐ Yes ☒ No
2. Are asylum seeking children in families detained in practice? ☐ Frequently ☒ Rarely ☐ Never

The LITP allows for the detention of vulnerable applicants, if detention is suited to their special needs i.e. if, by individual assessment, it is established that such a form of accommodation is suitable for their personal circumstances and needs, and especially for their health.<sup>594</sup> Moreover, it provides for detention of unaccompanied children, although separately from adults and for as short a period as possible if, through individual assessment, it is established that this form of accommodation is necessary.<sup>595</sup> According to the Ministry of Interior, in 2024 two unaccompanied asylum-seeking children were detained.<sup>596</sup>

### 4. Duration of detention

#### Indicators: Duration of Detention

1. What is the maximum detention period set in the law (incl. extensions): 6 months
2. In practice, how long in average are asylum seekers detained? Not available

Article 54(9) LITP provides a maximum detention time of three months, which may be extended by another three months. Where detention is applied in a Dublin procedure, however, it cannot exceed six weeks from the establishment of the responsibility of another Member State of the European Economic Area. If an administrative dispute has been initiated, the time limit of -six weeks shall be counted from the time the decision on dismissal becomes final.<sup>597</sup>

The Ministry of Interior reported that they do not keep records on the average duration of the restrictions on the freedom of movement at the Reception Centres for Foreigners. Measures for the restriction of freedom of movement are imposed as long as there are reasons listed in Article 54 paragraph 2 of the Law on International and Temporary Protection, for up to 3 months. Exceptionally, for justified reasons, measures may be extended for a maximum of three additional months.<sup>598</sup>

In 2024, the Ombudswoman Office conducted an investigation regarding an applicant for international protection who had been detained in a reception centre for more than eight months. The LITP provides for a maximum duration of detention of three months, with the exceptional possibility of a further extension of up to three months. In this particular case, after the maximum period expired, instead of being released from the Reception Centre for Foreigners, the person was deprived of his liberty pursuant to the Law on Foreigners, because his application for international protection had been rejected in the meantime. The High Administrative Court annulled the decision on his deprivation of liberty, stating that the the Law on Foreigners does not apply to him, but rather, since the decision on his application is enforceable, the LITP applies, on the basis of which he was previously deprived of his liberty for the maximum period. At the explicit request of the Office of the Ombudsman to the Ministry of Interior to provide them with all decisions

<sup>593</sup> EUAA: Information on procedural elements and rights of applicants subject to a Dublin transfer to Croatia, available at: <https://bit.ly/3VLNPKc>, 10.

<sup>594</sup> Article 54(7) LITP.

<sup>595</sup> Article 54(8) LITP.

<sup>596</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).

<sup>597</sup> Article 54(10) LITP.

<sup>598</sup> Information provided by the Ministry of Interior, 8 March 2024.

on the deprivation of liberty of that person, the Ministry of the Interior did not provide the judgment of the High Administrative which established that the last measure of deprivation of liberty was unlawful. It should be noted that the High Administrative Court had already issued a ruling with this legal understanding a year earlier.<sup>599</sup>

## C. Detention conditions

### 1. Place of detention

#### Indicators: Place of Detention

1. Does the law allow for asylum applicants to be detained in prisons for the purpose of the asylum procedure (i.e. not as a result of criminal charges)? ☐ Yes ☒ No
2. If so, are asylum applicants ever detained in practice in prisons for the purpose of the asylum procedure? ☐ Yes ☒ No

#### 1.1. Pre-removal and transit detention centres (“Reception Centres for Foreigners”)

Applicants for international protection are detained in the same premises as irregular migrants.<sup>600</sup>

There is a pre-removal detention centre (“Reception Centre for Foreigners”) in **Ježevo**, 30km from **Zagreb**, which has a total capacity of 95 places, according to the information provided by the Ministry of Interior in 2018.<sup>601</sup> The centre has capacity to accommodate 68 men, 12 women and 15 vulnerable persons. The special wing for vulnerable groups in Ježevo was finalised at the end of 2015 in order to detain women, families and unaccompanied children.

According to the CPT report from the 2020 visit, the separate two-storey residential unit for vulnerable groups in the Reception Centre for Foreigners in Ježevo consisted of five three-bedded rooms (each measuring 10 m2) and four four-bedded family rooms (each measuring approximately 16 m2) all of which have an adjoining sanitary annex equipped with a toilet, washbasin, and shower. The unit also possessed a spacious communal room, a kitchen for the preparation of food for children and a playground. The premises were in an adequate state of repair and hygiene and provided ample space and equipment.<sup>602</sup>

There are also two Transit Reception Centres for Foreigners in **Trilj** and **Tovarnik**, close to the Bosnian and Serbian borders respectively. Both centres are considered as Reception Centres for Foreigners.<sup>603</sup> Each centre can accommodate 62 migrants, and include a separate wing for vulnerable groups with 12 places.<sup>604</sup>

The activities performed by these centres are defined by the Decree on Internal Organisation of the Ministry of Interior,<sup>605</sup> and it is envisaged that the Transit Reception Centres will serve for the detention of foreigners apprehended for irregular crossing of the EU’s external border until their transfer to **Ježevo** or until removal under a readmission agreement. This would mean that they are primarily intended for shorter accommodation of foreigners.

<sup>599</sup> Ombudswoman: Report of the Ombudswoman for 2024, page 271, available at: <https://www.ombudsman.hr/hr/download/izvje-e-pu-ke-pravobraniteljice-za-2024-godinu/?wpdmdl=20339&refresh=67efca50785f31743768144>.

<sup>600</sup> Article 54(5)-(6) LITP.

<sup>601</sup> Information provided by the Border Directorate, 30 January 2018.

<sup>602</sup> Council of Europe, Report to the Croatian Government on the visit to Croatia carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 10 to 14 August 2020, available at: <https://rm.coe.int/1680a4c199>.

<sup>603</sup> ECRE, *Balkan route reversed*, December 2016, p. 17, available at: <https://bit.ly/3mWZAyE>.

<sup>604</sup> Information provided by the Border Directorate, 6 February 2019.

<sup>605</sup> Article 100f, 409 and 674, the Decree on Internal Organisation of the Ministry of Interior.

## 1.2. Airport transit zones and police stations

According to the information for 2018 provided by the Border Directorate of the Ministry of Interior,<sup>606</sup> places of deprivation of liberty for the accommodation of irregular migrants also include airport transit zones and premises in police stations. Special premises exist at **Zagreb Airport** (14 places) and at **Dubrovnik Airport** (6 places), while at other airports, space for international departure is also use for detention purposes. However no new information is available since 2018.

The total number of persons whose entry was refused at the airports in 2024 was 403. The total number of refusal of entry in 2024 was 13,567, which also includes land (13,145), sea (17) and rivers (2).<sup>607</sup>

The total number of police stations at the end of 2018 was 184, while the total number of places where migrants can be detained in police stations is 162. However, no information was made available since 2019.

In August 2020, the Council of Europe Committee for the Prevention of Torture (CPT) completed a five-day rapid reaction visit to Croatia to examine the treatment of persons attempting to enter the country and apprehended by the police.<sup>608</sup> Beside the Reception Centre for Foreigners in **Ježevo**, the delegation visited the **Cetingrad** Border Police Station, the **Donji Lapac** Border Police Station, the **Korenica** Border Police Station, and the Intervention Police Unit of the Karlovac Police Administration (**Mali Erjavec**). The preliminary observations of the delegation were presented to the Croatian authorities at the end of the visit. According to the Croatian Ombudsperson, the report on the CPT visit was adopted in November and the CoE Commissioner for Human Rights urged Croatia to publish it, as it is common practice for CPT reports to be made public, with exceptions being very rare.<sup>609</sup> The CPT report on the visit to Croatia was finally published in December 2021.<sup>610</sup>

## 2. Conditions in detention facilities

### Indicators: Conditions in Detention Facilities

1. Do detainees have access to health care in practice? ☒ Yes ☐ No  
❖ If yes, is it limited to emergency health care? ☒ Yes ☐ No

The Border Police Directorate of the Ministry of Interior is in charge of the management of the detention centre and the staff working within the centre are mainly police officers. In 2019, the Ministry of Interior reported that a total 75 employees work in the Reception Centre for Foreigners in **Ježevo**, 33 in the Transit Reception Centre in **Tovarnik** and 42 in the Transit Reception Centre in **Trilj**.<sup>611</sup> No new data is available since then.

The new Ordinance on accommodation in the Reception Centre for Foreigners and the method of calculating the costs of forced removal entered into force at the beginning of January 2022 and was amended in 2023.<sup>612</sup>

In the report for 2024, the Ombudswoman stated that accommodation conditions are being systematically improved in all three centres. However, at the Centre in Trilj, conditions for outdoor stay of persons deprived of liberty have still not been ensured, and at the Centre in Tovarnik, canopies have not been built in the yard. During the Ombudswoman's employees' visits to centres, they conducted anonymous surveys among

<sup>606</sup> Information provided by the Border Directorate, 6 February 2019.

<sup>607</sup> Ministry of Interior, *Statistical overview of basic safety indicators and work results in 2024*, page 157, available in [https://mup.gov.hr/UserDocsImages/statistika/2025/statistika%20za%202024%20hrv%20%20eng/Statisticki\\_pregled\\_2024\\_web.pdf](https://mup.gov.hr/UserDocsImages/statistika/2025/statistika%20za%202024%20hrv%20%20eng/Statisticki_pregled_2024_web.pdf).

<sup>608</sup> Council of Europe, *Council of Europe anti-torture Committee carries out rapid reaction visit to Croatia to examine treatment of migrants*, 18 August 2020, available at: <https://bit.ly/3dlr9ok>.

<sup>609</sup> Ombudswoman; Report of the Ombudswoman for 2020, available in Croatian at: <https://bit.ly/3aaQXar>.

<sup>610</sup> Council of Europe, Report to the Croatian Government on the visit to Croatia carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 10 to 14 August 2020, available at: <https://rm.coe.int/1680a4c199>.

<sup>611</sup> Information provided by the Ministry of Interior, Border Directorate, 6 February 2019.

<sup>612</sup> Official Gazette 145/2021, 155/2022, 137/2023

detained individuals in order to gain additional insight into their awareness of the following rights: access to legal aid, complaint mechanisms, healthcare, visits, phone calls, time outdoors, food, respect for religious beliefs, receiving mail and packages, managing financial resources, information on reasons for detention, the expected duration of detention, contact with family members, and the right to seek international protection.<sup>613</sup> The survey questionnaires were translated into nine languages (Arabic, English, French, Russian, Turkish, Farsi, Urdu, Kurdish, and Pashto). In Trilj and Tovarnik, all detained individuals participated in the survey — 45 persons in Trilj and 26 in Tovarnik — while in Ježevo, due to a lack of questionnaires in languages understood by the individuals, only 26 out of 46 participated. The questionnaire contained 20 questions, and the survey was anonymous and voluntary. According to the survey results, all three centres show issues with identifying vulnerable individuals and providing basic information about their rights. Most respondents stated that they had not been asked about possible traumatic experiences, such as whether they had been victims of torture, rape, or other forms of violence. In Ježevo, 82.6% of respondents said they had not been asked about traumatic experiences, in Tovarnik 61%, and in Trilj 96.6%, indicating a serious lack of systematic assessment and, where needed, support. The current staffing structure in the centres is not suitable for conducting such assessments, so the Ombudswoman recommended that professionals such as social workers, psychologists, or social pedagogues be employed in roles requiring such competencies. Procedures for identifying vulnerable groups also need to be developed.

The responses also indicated shortcomings in gathering information about individuals' health conditions and informing them about the possibility of receiving medical care. For example, in Ježevo, 47.8% of respondents said they were not asked whether they suffer from serious physical or mental illnesses; in Trilj that number was 96.6%, and in Tovarnik 61.5%. In one centre, the only employed nurse works part-time, while in another, those working in healthcare roles have qualifications unrelated to the tasks defined in the Ministry of the Interior's internal regulations — for example, backgrounds in economics or administrative law.

It is also concerning that the survey shows that detained persons are not sufficiently informed about their rights during their stay in the centre. For instance, in Trilj, 86.5% stated they were not informed of their right to contact their embassy or consulate, and only 17.8% said they could contact a lawyer, family member, or friend by phone. Others cited various reasons why this was not possible. The situation is similar in other centres, and it is troubling that many people do not know the reasons for their detention in the centre or how long they will be deprived of liberty. In Ježevo, 39.1% of respondents said they do not understand the staff addressing them, an issue also present in Trilj and Tovarnik.

According to the survey results, irregular migrants are also not adequately informed about their right to seek asylum. In Trilj, 77.8% of respondents said they were not informed of their right to apply for international protection, in Tovarnik 84.6%, while the situation is somewhat better in Ježevo, where 52.2% reported not receiving such information. When asked if they were able to apply for international protection, 97.5% in Trilj said they were not, and in Tovarnik, 96.2%. The situation is significantly better in Ježevo, where only 17.4% said they were unable to apply.<sup>614</sup>

## 2.1. Overall conditions

Conditions in the detention centre are satisfactory. According to the Ombudsman's report for 2024 the accommodation conditions are being systematically improved in all three centres. However, at the Centre in Trilj, conditions for outdoor stay of persons deprived of liberty have still not been ensured, and at the Centre in Tovarnik, canopies have not been built in the yard.<sup>615</sup>

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<sup>613</sup> This refers to irregular migrants, not only applicants for international protection.

<sup>614</sup> Ombudswoman: Report of the Ombudswoman for 2024, page 277-279, available at: <https://www.ombudsman.hr/hr/download/izvje-e-pu-ke-pravobraniteljice-za-2024-godinu/?wpdmdl=20339&refresh=67efca50785f31743768144>.

<sup>615</sup> This refers to irregular migrants, not only applicants for international protection.

With the support of the EU AMIF financial instrument, a new kitchen, laundry and a heating system were installed in the course of 2019 as well as a football field.<sup>616</sup> At the end of 2020, the Ministry of Interior's Decision was taken on the allocation of additional financial resources for the implementation of the project "*Assistance in maintaining an adequate level of accommodation in the Reception Centre for Foreigners*" within the framework of AMIF.<sup>617</sup>

In October 2020, information was published according to which the Reception centre for Foreigners in **Ježevo** implements the project: "*Improvement of accommodation conditions and working conditions in the Reception Center for Foreigners in Ježevo*". The aim of the project is to ensure adequate accommodation conditions for third-country nationals in accordance with EU standards, improve the infrastructure and to raise the level of quality of services as well as working conditions for employees in the Centre.<sup>618</sup> In June 2021, the Decision on the allocation of financial resources for the implementation of the project "*Improvement of accommodation and working conditions in the Reception Centre for Foreigners in Ježevo - II. phase*" was adopted.<sup>619</sup> In May 2021, the Decision on the allocation of financial resources for the implementation of the project "*Improvement of accommodation and working conditions in the Transit Reception Centre Trilj*" was adopted.<sup>620</sup>

In May 2022, a Decision was made on the allocation of financial resources for the implementation of the project "*Improvement of accommodation and working conditions in the Transit Reception Centre for foreigners Trilj*" within the framework of the AMIF.<sup>621</sup>

The purpose of this project is to improve the accommodation and working conditions in the Transit Reception Centre for foreigners in Trilj through the construction of sanitary facilities, the separation of the living area from the reception area for foreigners, the installation of a video surveillance system and an alarm bell, and the procurement of additional necessary equipment and furniture.

In 2023, following two decisions taken in 2018 and 2020, two decisions were made on the allocation of financial resources for the implementation of the project aimed for maintaining an adequate level of accommodation in the Reception Centre for foreigners within the framework of the AMIF.<sup>622</sup>

In April 2024, the Directorate for European Affairs, International Relations and EU Funds of the Ministry of the Interior adopted a Decision on the direct award of financial resources for the implementation of the project "*Support for Financing the Accommodation and Stay of Foreign Nationals in the Reception Centre for Foreigners*" under the AMIF. The purpose of the project is to support the Ministry of the Interior in financing adequate living conditions for third-country nationals and other irregular migrants accommodated in the Reception Centre for Foreigners. The total value of the project amounts to €500,000 including VAT and is financed in full (100%) through the operational support of the AMIF Programme.<sup>623</sup>

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<sup>616</sup> Council of Europe, Report to the Croatian Government on the visit to Croatia carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT), 10 to 14 August 2020, available at: <https://rm.coe.int/1680a4c199>.

<sup>617</sup> Ministry of Interior, Decision on the allocation of additional financial resources for the implementation of the project "Assistance in maintaining an adequate level of accommodation in the Reception Centre for Foreigners", available at: <https://bit.ly/3KAeu4W>.

<sup>618</sup> Ministry of Interior: Project "Improvement of accommodation conditions and working conditions in the Reception Center for Foreigners in Ježevo", 23 October 2020, available in Croatian at: <https://bit.ly/3emgiiW>.

<sup>619</sup> Ministry of Interior, Decision the allocation of financial resources for the implementation of the project "Improvement of living and working conditions in the Reception Centre for Foreigners in Ježevo - II. phase", available at: <https://bit.ly/3KzJKRi>.

<sup>620</sup> Ministry of Interior, Decision on the allocation of financial resources for the implementation of the project "Improvement of accommodation and working conditions in the Transit Reception Centre Trilj", available in Croatian at: <https://bit.ly/3MI0197>; Decision on allocation of additional financial resources, available in Croatian at: <https://bit.ly/43i8eI7>.

<sup>621</sup> Ministry of Interior: Project "*Improvement of accommodation and working conditions in the Transit Reception Centre for foreigners Trilj*", available at: <https://bit.ly/46cW8SH>.

<sup>622</sup> Ministry of Interior, Decisions on the allocation of financial resources for the implementation of the project aimed for maintaining an adequate level of accommodation in the Reception Centre for foreigners, available at: <https://bit.ly/4cqJt0u>.

<sup>623</sup> Ministry of the Interior: Support for Financing the Accommodation and Stay of Foreign Nationals in the Reception Centre for Foreigners, 2 May 2025, available at: <https://mup.gov.hr/potpورا-u-financiranju-troskova-smjestaja-i-boravka-stranaca-u-prihvatnom-centru-za-strance/294053>.

The new Ordinance on accommodation in the Reception Centre for Foreigners and the method of calculating the costs of forced removal entered into force at the beginning of January 2022.<sup>624</sup> The Ordinance was amended at the end of 2022 and in 2023.

According to the Ordinance, each room must guarantee 4m<sup>2</sup> per person and have access to daylight.<sup>625</sup> Every person has their own bed and there is sufficient space and separation between beds, as well as sufficient space to store personal possessions. Men and women are separated, except in the case of family. Family members, if they are not accommodated in the same room of the Centre, will be provided with daily meetings and socialising.<sup>626</sup> Detainees are provided with clothes,<sup>627</sup> although they are all dressed in identical tracksuits and cannot, in usual circumstances, use their clothes. Upon arrival in the Centre and during their stay, persons use the clothes, bed linen and hygiene supplies they are assigned. If necessary, their clothes are being washed and put away packed in a storage room, and only exceptionally foreigners may be allowed to use their own clothes, if the clothes are suitable for staying in the centre.<sup>628</sup>

There used to be a so-called library within the centre so detainees had access to books in various languages. Yet, according to the CPT report, the Centre had no library. However, in response to the report, the Croatian Government reported that bookcases have been set up in the living area. The books are available in English, German, Italian, Spanish, Russian, Turkish, Arabic, Urdu, Pashto and Farsi and the list is continuously updated.

However, no internet access is available. The centre is cleaned on a regular basis and there are sufficient showers and toilets. There is a common room with a TV available and migrants can spend most of the day there, watching TV or playing cards. There is also a facility for buying cigarettes and drinks. There are two public phones available to migrants at the Centre that can be used at their own cost. However, detained migrants are not allowed to use their mobile phones, which are seized upon admission to the Centre.<sup>629</sup>

If a person is in possession of any cash, it will be temporarily seized.<sup>630</sup> While staying in the Centre, people may however use the seized cash for necessary payments; the exchange of foreign currencies is done once a week. Any detainee cannot be in possession of an amount of money superior to EUR 53.09.<sup>631</sup>

The costs of accommodation of foreigners in the centre are charged as a flat rate at the amount of 33.18 euros per day and are calculated from the day accommodation until the day of discharge from the centre.<sup>632</sup> These costs are borne by the foreigners themselves and in the case of families, the costs are borne by the person who holds the funds.<sup>633</sup>

According to the Ordinance, persons are provided with three meals a day, of which at least one must be a warm meal. Children are provided with four meals a day. Specific diets can be prepared upon request for religious reasons, or when ordered by a doctor (e.g., for pregnant women).<sup>634</sup> In practice, quality of food is generally reported to be of a satisfactory level.

People are entitled to stay outdoors for at least two hours a day in a specially designated area within the Centre (there is a football playground serving as an outdoor exercise area).<sup>635</sup> This does not always happen, for example during bad weather conditions.

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<sup>624</sup> Official Gazette 145/2021, 155/2022

<sup>625</sup> Article 9 Detention Centre Ordinance.

<sup>626</sup> *Ibid.*

<sup>627</sup> Article 11 Detention Centre Ordinance.

<sup>628</sup> Article 11 Detention Centre Ordinance.

<sup>629</sup> Article 8 (3) Detention Centre Ordinance.

<sup>630</sup> Article 21 (1) Detention Centre Ordinance

<sup>631</sup> Article 21 Detention Centre Ordinance.

<sup>632</sup> Article 27 (5 )- (6) Detention Centre Ordinance.

<sup>633</sup> Article 28 (2) Detention Centre Ordinance.

<sup>634</sup> Article 16 (2) – (5) Detention Centre Ordinance.

<sup>635</sup> Article 15 (1) Detention Centre Ordinance.



Migrants, have the right to practice their religion, but they must respect the religious and cultural worldviews of other people in the centre. In addition, upon their requests, foreigners will be allowed be contact with religious communities.<sup>636</sup>

In 2023, the ECtHR issued its judgement in the case of *Daraibou v. Croatia*, concerning detention conditions in the premises of the Border Police station of **Bajakovo**. The case concerned a fire that broke out in the basement room of Border Police station **Bajakovo**, where applicant and three other migrants were detained as irregular migrants pending their expulsion back to Serbia next day. According to the Government, the applicant and other detainees set fire to their mattresses, bedsheets and clothes, probably using a cigarette lighter. The fire was intense and spread uncontrollably. A number of police officers rushed into the basement area to rescue the detainees. One of the detainees died at the scene of incident, while two others later succumbed to their injuries. The applicant had suffered severe injuries. The applicant complained under the substantive and procedural limbs of Articles 2 and 3 ECHR that Croatia is responsible for not preventing a life-threatening situation, a fire in the police station, owing to which he suffered grave bodily injuries and that no effective investigation has been carried out in that respect. In its judgement,<sup>637</sup> the ECtHR ruled, unanimously, that two violations of Article 2 (right to life/investigation) of the ECHR occurred. The Court concluded that the authorities had failed to provide the applicant with sufficient and reasonable protection of his life and limb, in violation of Article 2. It also held that there had been a further violation of Article 2 as concerned the investigation into the tragic fire. Although the authorities' initial reaction had been prompt, certain questions – concerning searches and monitoring of detainees, as well as the adequacy of the premises – had been left unanswered and no attempt had been made to establish whether there had been broader institutional shortcomings which earlier identification could have prevented similar errors in the future.<sup>638</sup>

## 2.2. Health care and special needs in detention

During the stay in the centre, access to health care services is provided to third country nationals. In case individual medical condition worsens outside working hours of the Centre's doctor's office, officials will take measures to provide assistance and all measures to eliminate the danger to the foreigner's life or health. Special medical care is provided to pregnant women and women giving birth.<sup>639</sup>

Upon admission to the centre, the foreigner is obliged to undergo a general medical examination.<sup>640</sup> Immediately upon placement in the centre, the person is obliged to inform the officials about any existing health and mental condition. In case of infection or suspicion of the existence of an infectious disease, the foreigner is placed in a special room and provided with medical care.<sup>641</sup>

The health and medical care of persons who are accommodated at the Reception Centre in **Ježevo** is conducted by a general practitioner. An emergency medical service also comes to the Centre when called. If a person does not speak English, the telephone interpretation is conducted by interpreters with whom the Ministry of the Interior has concluded an agreement either during a basic medical examination, a screening, or during health checks but also when transporting persons to specialist examinations and during treatments in hospitals and specialised institutions. Psychosocial assistance and protection are conducted in cooperation with the Croatian Red Cross.

According to the knowledge of Croatian Law Centre, there is no special mechanism in the detention centre to identify persons with special reception needs. A special facility exists for vulnerable groups within the Centre. This facility is an integral part of the Reception Centre for Foreigners, which is an organisational unit of the Border Police Directorate. Beside rooms for accommodation, the facility has a living room and a playroom for children, and facilities for education, health care, isolation, psychologists and educators.

<sup>636</sup> Article 17 Detention Centre Ordinance.

<sup>637</sup> ECtHR, *Daraibou v. Croatia*, Judgment, available at: <http://bit.ly/3THBvbb>.

<sup>638</sup> ECtHR, Press Releases: *Judgment Daraibou v. Croatia - fatal fire in police-station basement room used to detain illegal migrants*; available at: <https://bit.ly/3IFUYfS>.

<sup>639</sup> Article 13 Detention Centre Ordinance.

<sup>640</sup> Article 12 (2) Detention Centre Ordinance.

<sup>641</sup> Article 7 Detention Centre Ordinance.

However, as stated above, concerns regarding -among others- the identification of vulnerabilities and access to healthcare were identified in the Ombudswoman's report for 2024.

In 2022, the Croatian Red Cross (CRC) made a leaflet on the topic of mental health and psychosocial support for detained persons. The leaflet explains what reactions people in detention can have and what they can do to make it easier for themselves.<sup>642</sup>

In 2024, the CRC continued to provide psychosocial support in all three centres.<sup>643</sup>

### 3. Access to detention facilities

#### Indicators: Access to Detention Facilities

1. Is access to detention centres allowed to

- |                   |   |   |                             |
|-------------------|---|---|-----------------------------|
| ❖ Lawyers:        | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Limited            | <input type="checkbox"/> No |
| ❖ NGOs:           | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> Limited | <input type="checkbox"/> No |
| ❖ UNHCR:          | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Limited            | <input type="checkbox"/> No |
| ❖ Family members: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Limited            | <input type="checkbox"/> No |

According to the Detention Centre Ordinance, after being placed in the centre, individuals are entitled to one free phone call with their country's diplomatic mission or consular office, and to another private phone call lasting up to 5 minutes. An exception is provided for minors who have the right to talk to their guardians by phone without cost and limitation. Foreigners can make other calls through the public phone in the centre at their own expense.<sup>644</sup>

Detainees are allowed to receive visits at least twice a week.<sup>645</sup> The centre must be notified about the visit in writing at least two days earlier. A visit may be prohibited if it is established that the visitor is not announced or if they pose a threat to public order, public security and health or that they are prone to improper behaviour and violation of regulations. Visits to third-country nationals shall take place in a special room for visits. The visit may last for up to an hour, regardless of the number of visitors. On an exceptional basis, a visit may last longer if approved by the head of the centre or the person designated by the head of the centre. A police officer can terminate a visit, if during the visit security, order and peace in the centre are disturbed or if it is determined that the visitor has arrived in a different capacity than announced.

Detainees shall be provided with an opportunity to communicate with their attorney and the competent national or international institutions or organisations in the field of protection of human rights and fundamental freedoms, with which the Ministry of Interior has concluded a cooperation agreement. In order to effectively realise such communication, the attorney and representatives of such organisations shall be allowed access to the centre in accordance with the rules on visits,<sup>646</sup> meaning that visits must be announced two days in advance and may last up to maximum one hour. If the attorney is not authorised by a foreigner, they are considered a visitor. The Amendments to the Detention Ordinance from 2023 prescribed an exception to the rule that the visit must be announced to the Centre in writing at least two days in advance, i.e., attorney or legal representative in urgent and justified cases can access to the Centre following a prior telephone announcement at least two hours before arrival.

#### 3.1. Access of lawyers to detention facilities

Attorneys at law who are on the list of providers of free legal aid reported to Croatian Law Centre that they did not encounter problems when accessing Reception Centres for Foreigners. However, according to the

<sup>642</sup> Information provided by the Croatian Red Cross, 18 January 2023.

<sup>643</sup> Information provided by Croatian Red Cross, 20 January 2025.

<sup>644</sup> Article 18 Detention Centre Ordinance.

<sup>645</sup> Article 19 Detention Centre Ordinance.

<sup>646</sup> Article 25 (5)-(6) Detention Centre Ordinance, citing Article 19.

Ombudswoman's report for 2024,<sup>647</sup> difficulties in accessing legal aid providers were observed and access for attorneys to the centres remains difficult.<sup>648</sup> Those who are not on the list of free legal aid providers and do not yet have a power of attorney because they are meeting clients for the first time must announce their visit two days in advance and are treated as visitors, not legal representatives. Also, due to coordination with interpreters, short legal deadlines can be missed. Telephone communication is also difficult, especially at the beginning when the attorney needs to obtain a power of attorney, and later, when individuals must wait for the attorney's call in front of a phone booth. As highlighted by the Ombudswoman, these conditions are contrary to international standards guaranteeing unhindered access to an attorney from the very beginning of the deprivation of liberty.

### 3.2. Access of NGOs and UNHCR to detention facilities

During 2024, the Croatian Red Cross (CRC) did not face issues to access transit reception centres and reception centres for foreigners. Throughout 2024, CRC continued with regular psychosocial support activities and efforts to restore family links in the reception and transit centers for migrants in Ježevo, Trilj, and Tovarnik. CRC's employees from Tracing Service and Migrant Protection Service, who provide psychosocial support, visited the Reception Centre for Foreigners in Ježevo on a weekly basis. The Transit Reception Centres in Trilj and Tovarnik were visited by CRC's employees on average every two months.<sup>649</sup>

These activities were implemented under the Cooperation Agreement with the Ministry of the Interior of the Republic of Croatia, valid from 2023 to mid-2026. The activities were funded through the following projects: the *Global Route Based Migration Programme – Migration Case for Support* by the International Federation of Red Cross and Red Crescent Societies (IFRC), as well as support from the International Committee of the Red Cross (ICRC) and UNHCR. The Reception Center for Foreigners in Ježevo was visited weekly, totaling 42 visits. The transit reception centers in Trilj and Tovarnik were visited four and five times, respectively, depending on the number of migrants present and their specific needs.<sup>650</sup>

The CRC reported that in 2024, persons detained in the Reception Centre for Foreigners in Ježevo have been provided with the possibility to call their family members via social media and the internet. It is important to note that family members cannot see where persons are, while detained persons can see their family members, which has contributed to greater psychosocial well-being of detainees in the center.<sup>651</sup>

In practice, other NGOs have been facing obstacles to access detention centres for the past several years. The Centre for Peace Studies was granted a visit in 2024 to see an applicant for international protection while the applicant was in detention at the Transit Reception Centre for Foreigners in Trilj.<sup>652</sup>

The UNICEF Office for Croatia reported that in 2024 they continued cooperation with the Ministry of Interior in implementing activities in the field of protection of children and families of refugees and migrants. Cooperation in the development and establishment of training for police officers in assessing the vulnerability of children and persons caring for children in migration has not been realized, given that the capacity building of police officers is carried out through Frontex trainings, such as "*Families with children in return*". Cooperation also continued through the regular exchange of data on refugee and migrant children in Reception Centres for applicants for international protection, the Reception Center for Foreigners and Transit Reception Center for Foreigners. However, during 2024, UNICEF Office for Croatia

<sup>647</sup> Ombudswoman: Report of the Ombudswoman for 2024, page 279, available at: <https://www.ombudsman.hr/hr/download/izvje-e-pu-ke-pravobraniteljice-za-2024-godinu/?wpdmdl=20339&refresh=67efca50785f31743768144/>.

<sup>648</sup> The information relates generally to access by attorneys, not just those representing applicants for international protection.

<sup>649</sup> Information provided by Croatian Red Cross, 20 January 2025.

<sup>650</sup> Croatian Red Cross: Annual report on the work of the Croatian Red Cross in 2024, page 84, available at: [https://www.hck.hr/UserDocImages/vijesti/2025/AD%205\)%20Izvje%C5%A1%C4%87e%20o%20radu%20HCK%20u%202024.pdf?vel=5096156](https://www.hck.hr/UserDocImages/vijesti/2025/AD%205)%20Izvje%C5%A1%C4%87e%20o%20radu%20HCK%20u%202024.pdf?vel=5096156).

<sup>651</sup> Information provided by Croatian Red Cross, 20 January 2025.

<sup>652</sup> Information provided by Centre for Peace Studies, 27 February 2025.

did not request access to the Reception Center in Ježevo, nor to the Trilj and Tovarnik transit reception centers<sup>653</sup>

UNHCR has access to the Centres but each of its visit should be announced in advance.

According to the Ombudswoman's report for 2024, UNHCR representatives visit the Reception Centre for Foreigners in Ježevo once every three months. In addition, until June 2024, UNHCR representatives visited the Center in Tovarnik once, and during 2024, they also visited the center in Trilj once.<sup>654</sup>

## D. Procedural safeguards

### 1. Judicial review of the detention order

#### Indicators: Judicial Review of Detention

1. Is there an automatic review of the lawfulness of detention? ☐ Yes ☒ No
2. If yes, at what interval is the detention order reviewed?

Applicants for international protection are informed orally by the staff of the Ministry of Interior about the reasons of their detention during the delivery of the decision.

In practice, the interpreter is present at the delivery of the decision and reads decision to them.<sup>655</sup>

As reported by one attorney at law, in 2024, some applicants for international protection who were accommodated in detention centers stated difficulties due to not understanding the reasons that led to their deprivation of liberty. The same attorney at law reported that, in some cases, no interpreter was present at the time the accommodation decision was delivered. Instead, interpretation was either conducted over the phone (without the interpreter being able to see the decision being delivered, and only translating the verbal statements of the official and the applicant), or there was no interpreter present at all.<sup>656</sup>

Applicants may lodge a lawsuit to the Administrative Court against a detention decision within eight days after its delivery. The authority that has issued the decision, i.e., the Ministry of Interior, the police administration or the police station, shall submit the case file to the Administrative Court no later than within eight days following the day of receipt of the decision by which the Administrative Court requests the case file. The Administrative Court shall issue a decision after a personal interview within 15 days from the day of receipt of the case file. However, there are no legal consequences for not respecting the 15-day time limit prescribed by the relevant legislation. Also, the lawsuit does not suspend the decision.

The 2023 amendments to the LITP also introduced the review of the decisions on restriction of freedom of movement. According to the amendments, restriction of movement, at reasonable time intervals, shall be reviewed *ex officio* by the competent Administrative Court or at the request of the applicant, especially when the restriction of movement lasts longer than a month and in the event of a change or the occurrence of new circumstances that may affect the lawfulness of the restriction of movement of the applicant. If the competent Administrative Court determines that the decision on the restriction of freedom of movement is unlawful, the Ministry of Interior shall act according to the pronounced judgment and release the applicant immediately.<sup>657</sup> According to the opinion of one attorney at law, the provision on *ex officio* revision is unenforceable in practice.<sup>658</sup>

<sup>653</sup> Information provided by UNICEF Office for Croatia, 4 February 2025.

<sup>654</sup> Ombudswoman: Report of the Ombudswoman for 2024, page 280, available at: <https://www.ombudsman.hr/hr/download/izvje-e-pu-ke-pravobraniteljice-za-2024-godinu/?wpdmdl=20339&refresh=67efca50785f31743768144/>.

<sup>655</sup> Information provided by attorneys-at-law, 3 December 2019.

<sup>656</sup> Information provided by attorneys-at-law, 31 January 2025.

<sup>657</sup> Article 54(13)-(14) LITP.

<sup>658</sup> Information provided by attorneys-at-law, 31 January 2025.

According to the Administrative Court in Zagreb, the court information system for managing and work on court cases does not recognise the difference between cases in which freedom of movement was restricted by other alternative measures or by detention in the Reception Centre for Foreigners.<sup>659</sup> Thus it is not possible to report the number of cases in which the court had to decide on detention in the Reception Centre for Foreigners.

In 2024, the Administrative Court of Zagreb decided 95 cases of restriction of movement of applicants for international protection. Most lawsuits against the restriction of the freedom of movement brought before the Administrative Court of Zagreb were rejected in 2024. Out of the 95 lawsuits, more than half (81) were rejected, 3 were accepted and referred back to the Ministry of Interior, in 9 cases reformatory judgment was brought, 1 case was suspended and in 1 case the lawsuit was dismissed.<sup>660</sup> The average time for processing such cases was 44 days. Other Administrative Courts did not deal with lawsuits against restrictions to the freedom of movement in the course of 2024.

In 2024, the High Administrative Court received 12 onward appeals in cases of restriction of movement of applicants for international protection and 12 were rejected while 1 was accepted.<sup>661</sup>

In 2024, detention of an applicant for international protection who sought asylum in Croatia due to fear of persecution related to his activism in his country of origin and who, in 2023, recorded a video highlighting the poor reception at the Reception Center for Applicants for International Protection in Zagreb and posted it on YouTube, got further attention. Namely, in autumn 2023, the Security and Intelligence Agency (SIA) designated him as a *“threat to the national security and public order of the Republic of Croatia”* based on the recording of this video and the criminal accusations in his country of origin (i.e., Russia). This, in turn, led to the Ministry of the Interior’s decision in June 2024 to reject his application for international protection based on the exclusion clause despite him fulfilling the conditions for asylum. In April 2024, he recorded and published a YouTube video explaining the asylum procedure in Croatia. In July 2024, he held a single-person protest in Zagreb, to attract public attention to the alleged human rights violations in other applicants’ for international protection cases by the SIA. He wore a T-shirt with a provocative inscription and held a poster with examples of cases with alleged SIA’s violations. As a result, he was apprehended and sentenced to 15 days in detention for insulting Croatian authorities, after which he was placed at the Transit Reception Center for Foreigners in Trilj for three months.<sup>662</sup> This decision was challenged before the Administrative Court in Zagreb and, in September 2024, the Administrative Court in Zagreb rejected the respondent’s case to annul the decision. In October 2024 his attorney-at-law filed an appeal against the judgement of the Administrative Court in Zagreb. On 18 October 2024 he was dismissed from the Transit Reception Centre for Foreigner in Trilj, due to the expiration of the three months.<sup>663</sup> Ultimately, in March 2025, the High Administrative Court ruled that his detention at the Transit Reception Centre in Trilj was unlawful. The High Administrative Court found that there had been no individual assessment of all the circumstances of the specific case, including whether the legitimate objective (i.e., the protection of public order) could have been achieved by less restrictive means.<sup>664</sup>

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<sup>659</sup> Information provided by the Administrative Court in Zagreb, 18 February 2021.

<sup>660</sup> Information provided by the Administrative Court in Zagreb, 17 January 2025.

<sup>661</sup> Information provided by the High Administrative Court, 22 January 2025.

<sup>662</sup> Un Special Rapporteur on Human Rights Defenders: Croatia: rejection of asylum application, detention and potential deportation to Russia of HRD Vladislav Arinichev (joint communication), 18 November 2024; available at: <https://srdefenders.org/croatia-rejection-of-asylum-application-detention-and-potential-deportation-to-russia-of-hrd-vladislav-arinichev-joint-communication/>.

<sup>663</sup> The Permanent Mission of the Republic of Croatia to the United Nations Office in Geneva: Observations of the Government of the Republic of Croatia, available at: <https://spcommreports.ohchr.org/TMResultsBase/DownloadFile?gld=38744>.

<sup>664</sup> Centar for Peace Studies: *The Detention of Vladislav Arinichev Was Unlawful – Ruled the High Administrative Court in Zagreb!*, available at: <https://www.cms.hr/detencija-vladislava-arinicheva-bila-je-nezakonita-presudio-je-visoki-upravni-sud-u-zagrebu>



## 2. Legal assistance for review of detention

### Indicators: Legal Assistance for Review of Detention

1. Does the law provide for access to free legal assistance for the review of detention?  
☒ Yes ☐ No
2. Do asylum applicants have effective access to free legal assistance in practice?  
☒ Yes ☐ No

In detention cases, applicants are entitled to free legal aid similarly to their right to legal aid in the international protection procedure (see [Legal assistance](#)). In practice when a decision is delivered to detained applicants, they are also given the list of providers of free legal aid from which they can choose an attorney or lawyer from NGO, who are then notified by the Ministry of Interior. Attorneys and lawyers from NGO secure an interpreter for the appointment and then inform the Ministry of Interior.

According to national legislation, the measure of accommodation at the reception centre for foreigners (i.e., detention) may be imposed if, following an individual assessment, it is established that other alternative measures would not achieve the purpose of restriction of freedom of movement. However, in previous years, legal representatives reported that decisions on the restriction of freedom of movement do not always contain a reasoning behind the individual assessment. They simply state that the individual assessment has determined that detention is necessary because other measures cannot achieve the purpose of restricting freedom of movement.<sup>665</sup> Something similar was reported for 2024.

In addition, in cases involving restrictions of freedom of movement, one attorney at law reported that, in a particular case, the Administrative Court scheduled the hearing at the time of expiration of detention.<sup>666</sup> In other cases, hearings were scheduled within a period of one to two months, while the imposed restriction lasted for three months. According to the same attorney, applicants for international protection are generally not summoned to attend hearings in administrative disputes related to the restriction of freedom of movement. In some cases, courts did not instruct the respondent to submit the case file within the eight-day deadline stipulated under the Law on International and Temporary Protection), but instead applied the general 30-day deadline provided by the Law on Administrative Disputes. Furthermore, according to the attorney's information, applicants are often not informed of the specific reasons for the restriction. They are notified only in general terms that the decision concerns the restriction of freedom of movement through placement in the Reception Centre for Foreigners for a certain period, but applicants for international protection often state that they do not understand the concrete grounds for the measure. The same attorney also reported that in some cases, when the decision on the restriction of movement was served, an interpreter was not present in person. Instead, interpretation was provided over the phone (without the interpreter being able to see the decision and translating only the oral statements of the official and the applicant), or there was no interpreter at all. Several attorneys noted that, although the decisions formally state that an individual assessment was conducted, decisions fail to provide reasoning as to which criteria and individual circumstances were taken into account.<sup>667</sup> One attorney at law noted that decisions sometimes reference the applicant's age and the existence of a travel document, as well as a general conclusion that the person is not vulnerable, even though such claims are often inaccurate.<sup>668</sup> In some cases, applicants did not possess valid travel documents, and there were clear indications that they should have been classified as vulnerable individuals (e.g., survivors of torture or persons with mental health issues).

### E. Differential treatment of specific nationalities in detention

There is no information suggesting that specific nationalities are more susceptible to detention or systematically detained, nor that specific nationalities stay longer in detention in practice.

<sup>665</sup> Information provided by attorneys at law, 3 December 2019, 6 December 2019, 16 December 2019, 21 January 2020.

<sup>666</sup> Information provided by attorney at law, 31 January 2025.

<sup>667</sup> Information provided by attorneys at law, 19, 21 and 31 January 2025.

<sup>668</sup> Information provided by attorney at law, 31 January 2025.



However, Centre for Peace Studies reported that in November 2022, they began to receive inquiries indicating that a large number of Chechens, of whom a large number were applicants for international protection and who were previously accommodated in the Reception Centre for Applicants for International Protection, were detained in the Reception Centre for Foreigners for unknown reasons and that were at risk of deportation.<sup>669</sup> No such information was received for 2024.

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<sup>669</sup> Information provided by Centre for Peace Studies, 30 January 2024.

### Inclusion policy at the national level

Croatia currently does not have a valid migration policy, the most important national strategic document for migration management. In the period up to 2015, Croatia adopted two migration policies, one for the period 2007-2008, and the subsequent one for the period 2013-2015. Although according to some information from previous years, a new migration policy is being prepared, but it was drafted primarily by the Croatian Ministry of Interior, without significant involvement of independent professionals, and without the involvement of civil society organisations, no new information was available at the end of 2024.

The previous Action plan for the integration of beneficiaries of international protection, which covered the period from 2017-2019 expired at the end of 2019. By the end of 2024, the new Action Plan was still not adopted. According to the Ombudsman's report for 2024, given that its draft had not been submitted for public consultation until the beginning of 2025, a new document will be drafted. In 2024, neither the Action Plan for Combating Discrimination for 2024 and 2025 nor the Action Plan for the Protection and Promotion of Human Rights for 2024 and 2025 was adopted. Both documents were only in public consultation at the end of 2024.<sup>670</sup>

The UN Committee on the Elimination of Racial Discrimination, in its *Concluding observations on the combined ninth to fourteenth periodic reports of Croatia* from October 2023, recommended Croatia to take measures, including developing and implementing a policy framework, to enhance the full participation and integration of migrants, applicants for international protection and refugees into society, including by providing language training, vocational training and employment opportunities.<sup>671</sup>

In accordance with the LITP, the Office for Human Rights and the Rights of National Minorities (OHRNM) of the Government of the Republic of Croatia coordinates the work of all Ministries, non-governmental organisations and other bodies that participate in the process of inclusion in society of asylees or foreigners under subsidiary protection within the framework of the Permanent Commission for the Implementation of the Integration of Foreigners into Croatian Society and the associated Working Group that prepares proposals of national strategic documents in this area.<sup>672</sup> The Permanent Commission for Integration was established in 2013, and it has been expanded several times since then. The tasks of the Permanent Commission for Integration include, among other things, monitoring and coordination of the implementation of regulations, programs, strategies and plans in the field of integration of asylees or foreigners under subsidiary protection.

At the session held on 19 December 2022, the Permanent Commission unanimously adopted the Protocol on Procedures for the Integration of Persons Granted International Protection.<sup>673</sup> The Protocol was prepared in a participatory process and through cooperation with representatives of the academia, local self-government units and competent departmental bodies. The Working Group for the preparation of the Protocol on Procedures for the Integration of Persons Granted International Protection, consisted of representatives of the Ministry of Interior, the Ministry of Labour, the Pension System, Family and Social Policy, the Ministry of Science and Education, the Ministry of Health, the Central State Office for reconstruction and housing, the Croatian Employment Service, the City of Zagreb, City of Karlovac and City of Varaždin.<sup>674</sup>

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<sup>670</sup> Ombudswoman, Report of the Ombudswoman for 2024, page 162, available at: <https://www.ombudsman.hr/hr/download/izvje-e-pu-ke-pravobraniteljice-za-2024-godinu/?wpdmdl=20339&refresh=67efca50785f31743768144/>.

<sup>671</sup> United Nations, Committee on the Elimination of Racial Discrimination; Concluding observations on the combined ninth to fourteenth periodic reports of Croatia, available at: <https://bit.ly/4b83B6D>.

<sup>672</sup> Article 76 (5) LITP.

<sup>673</sup> Text of the Protocol on Procedures for the Integration of Persons Granted International Protection is available in Croatian at: <https://bit.ly/3K49FD3>, and in English: <https://bit.ly/3N6I4Uj>.

<sup>674</sup> Office for Human Rights and the Rights of National Minorities: The Protocol on Procedures for the Integration of Persons Granted International Protection has been published, available in Croatian at: <http://bit.ly/3z1cWww>.

In 2024, OHRRNM started with the implementation of the project SINERGY – „Ensuring a synergistic approach to the integration of citizens of third countries”, co-financed by the AMIF.<sup>675</sup> In July 2024, the initial conference of the project was held, where the project activities were presented. The main goals of the project are to reduce administrative obstacles in accessing guaranteed rights and services by providing translation services into the languages most often used by persons granted international protection and other third-country nationals, to strengthen the coordination capacities of the integration system through intensifying cooperation with local self-government units, third-country nationals and civil society organizations, to increase the awareness of key stakeholders and the general population regarding legal migration and the contribution of third-country nationals to the development of society and to improve the process of drafting, monitoring implementation, and reporting on the results of the implementation and evaluation of the impact of the implementation of measures from the strategic acts for integration from the perspective of the implementation holder and user.

In the second half of 2024, the OHRRNM completed preparations for the establishment of a centralized electronic database of interpreters/translators for the languages most often used by persons granted international protection and other third-country nationals. The database will provide easier access to quality translation/interpretation services for all users who need translation/ interpretation assistance. Users of the database will be state and public administration bodies, local and regional self-government units, and other institutions that provide services to persons granted international protection (doctors, school teachers, social workers,...).

As part of the SINERGY project, in June 2024 the Advisory Group of Third-Country Nationals and Persons with a Migrant Background was established and ten members were appointed. The aim of establishing the Advisory group is to strengthen the perspective of third-country nationals and persons with a migrant background in the political debate and contribute to the improvement of integration policies by providing recommendations to decision-makers at all levels and involving them in the creation, implementation and evaluation of integration policies and strategies. A total of eight meetings of the Advisory Group will be held during the SINERGY project, and at the meetings, members will primarily address four thematic areas: work and employment; health care for foreigners; language learning and education and accommodation and housing.

The first two meetings of the Advisory Group were held in October and November 2024. The main topics were the challenges and opportunities for third-country nationals on the Croatian labor market. In addition to members of the Advisory Group and representatives of the OHRRNM, representatives of the Croatian Employment Service and the Croatian Employers' Association also participated at the meetings. A policy report based on the meetings held on the topic of Labor and Employment is under preparation and will be presented at a round table in 2025. Some of the problems highlighted by the members of the Advisory Group are: recognition of foreign qualifications and difficult access to employment in the profession, and problems with self-employment and access to the labor market. Also, through the experiences of the members of the Advisory Group, significant challenges were identified regarding the lack of coordination between institutions, which leads to long administrative procedures, delays in issuing permits, and unclear procedures that make it difficult to employ and move foreign workers. In addition to the above, the language barrier and integration in the workplace, as well as discrimination and working conditions, are still cited as problems. OHRRNM highlighted that not all members are persons granted international protection, so the above does not apply exclusively to this group, but more broadly to all third-country nationals.

Also, in November 2024, the first meeting with representatives of civil society organizations and international organizations was held as part of the SINERGY project. During the project, six meetings will be held with representatives of civil society organizations and international organizations. The purpose of the meetings is the exchange of information and experiences related to the implementation of international and domestic projects, initiatives and activities aimed at improving the standards of reception and integration of citizens of third countries.

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<sup>675</sup> Information provided by the Office for Human Rights and the Rights of National Minorities, 18 February 2025.

The Croatian Red Cross reported that numerous trainings were conducted during 2024 on the topic of migration and integration of persons under international and temporary protection. In cooperation with the Agency for Education, training courses are regularly held for professional staff of kindergartens, primary and secondary schools on the topic of integration of refugee children into the education system. Training courses are mainly held online so that participation is possible for staff from all over Croatia, while one training course on this topic was held live in city of Rijeka.<sup>676</sup>

### **Inclusion policy at the local level**

At the local level, the first Action Plan of the City of Zagreb for the Integration of Applicants for and Beneficiaries of International Protection for 2022<sup>677</sup> was adopted in January 2022, making the City of Zagreb the first unit of local and regional self-government in Croatia to adopt such strategic document.<sup>678</sup> Measures and activities included social protection, health care, language learning and education, work and employment, strengthening local capacities and intercity and international cooperation. In May 2023, the City Assembly of the City of Zagreb adopted new Action Plan of the City of Zagreb for the implementation of the Charter of Integrating Cities for 2023 and 2024.<sup>679</sup> The general objective of the Action Plan is to encourage and implement the integration of applicants for international protection, persons granted international or temporary protection, and foreign workers residing in the City of Zagreb, into society, and to contribute to the development of the entire migration policy in the Republic of Croatia. The specific objectives of the Action Plan are elaborated through 7 thematic areas: 1. Information and exercise of rights; 2. Social and health care; 3. Language learning and education; 4. Intercultural learning; 5. Preparation for job search and employment; 6. Strengthening of local integration capacities; and 7. Intercity and international cooperation.

During 2024, the implementation of the Action Plan of the City of Zagreb for the implementation of the Charter of Integrating Cities for 2023 and 2024 has continued, which is aimed at the integration of applicants for international protection, persons granted international or temporary protection and foreign workers residing in the area of the City of Zagreb.

A Croatian language course was organized at the SUVAG School of Foreign Languages for applicants for international protection, persons granted international or temporary protection, and foreign workers with residence and work permits, with the option of taking exams and obtaining a certificate of Croatian language proficiency, which is required for regulation of status in Croatia or continuation of education. The Croatian language course was also implemented by six civil society organizations selected through a Public Call for Expressions of Interest from civil society organizations to participate in the implementation of the City of Zagreb's Action Plan for the implementation of the Integrating Cities Charter for 2023 and 2024. Participants mainly attended language courses at beginner levels (A1, A2, and B1).

A total of 443 participants attended the free Croatian language course. Additionally, 10 persons passed the certified exam without attending the course, for which €1,194.50 was spent. Furthermore, the City of Zagreb co-financed 12 civil society organizations for the implementation of measures and activities from the Action Plan (interpretation services, cultural mediation, women's empowerment, workshops introducing Croatian culture and traditions, raising public awareness on the topic of integration, and strengthening the competencies of City of Zagreb officials). In 2024, a Public Call was also issued for awarding financial support for the education of secondary school students and university students granted international or temporary protection for the year 2024. The call foresees 75 scholarships in the amount of €2,000 per student. The scholarships are paid as a one-time amount from the City of Zagreb's Budget for 2024.

In addition, four EU integration projects were implemented in the course of 2024: the *Cities4Refugees* project, funded by the Citizens, Equality, Rights and Values (CERV) Programme, and the *UNITES* project, funded by the AMIF, both of which concluded in 2024; the *CONSOLIDATE* project, implemented in

<sup>676</sup> Information provided by the Croatian Red Cross, 20 January 2025.

<sup>677</sup> Text of the Action Plan is available in Croatian at: <https://bit.ly/3Zbg9o0>.

<sup>678</sup> See more at: <http://bit.ly/40cXQjw>.

<sup>679</sup> Action Plan of the City of Zagreb for the implementation of the Charter of Integrating Cities for 2023 and 2024, available in Croatian at: <https://bit.ly/3xmVYeN>.

partnership with the EUROCITIES network and funded by AMIF; and the *Plan Einstein Academy* project, which began in October 2024 and is co-financed by the European Regional Development Fund (ERDF) under the URBACT programme. The *Plan Einstein Academy* project is an innovative approach to the reception, integration and inclusion of foreigners in cities from the first day of their arrival, whose concept and basic principles were developed by the City of Utrecht. City of Zagreb participates in the *Plan Einstein Academy* project as one of six partner cities. As part of the *Cities4Refugees* project, a final conference was held to present the results of the two-year activities and the plan for the continuation of the project. As part of the *UNITES* project, the research was carried out as the last activity of the project (i.e. mapping the needs of refugees and migrants in Zagreb, which will be the basis for the development of a new strategic integration document of city).

In addition, the implementation of the project '*ALTERNative Education – Intercultural School Lesson*' also continued in Zagreb's primary and secondary schools. This project, which contributes to reducing prejudice by creating the conditions for building a fair and inclusive society, was implemented during 2024 in 49 Zagreb schools (29 primary and 17 secondary schools), involving 1,300 students.<sup>680</sup>

In November 2023, the City of Zagreb and UNHCR organised a round table to discuss modalities for a 'one-stop shop' for refugees, which was expected to be launched under the City of Zagreb's local integration action plan in 2024, with UNHCR support.

In March 2024, UNHCR, together with the City of Zagreb, organized a training for the staff of Croatia's first 'one-stop shop'. In addition to an introduction to refugee protection, over 30 representatives from local government and civil society organizations strengthened their capacity for communicating with communities; identification and referral of survivors of gender-based violence and victims of trafficking, and empowering refugees and applicants for international protection for employment. This took place in the framework of the City of Zagreb's local integration action plan, and was followed by joint World Refugee Day events on 15 June, and the signature of a Cooperation Agreement between UNHCR and the City of Zagreb on 19 September 2024, and the Welcome Centre (One Stop Shop) was opened in Zagreb with UNHCR support.<sup>681</sup> The One Stop Shop is envisaged as a unique central point for informing applicants for international protection, individuals granted international or temporary protection, and foreign workers with residence and work permits. It is the first service of this kind in Croatia. In the Welcome Centre beneficiaries can get information from the field of social protection and health in the jurisdiction of the City, information on enrolment in kindergarten, primary and secondary schools, on opportunities to obtain scholarships for pupils and students with granted international and temporary protection, general legal information, information on regulating civil status (marriage, registration of life partnership, registration of birth, etc.), information on the performance of economic activities through trades, information on enrolment in Croatian language courses and information on all other integration activities (educations, workshops, cultural mediation, etc.).<sup>682</sup> In addition to providing information about all available services and rights under the responsibility of the City of Zagreb, clients will also be able to receive information about the implementation and inclusion in other integration activities carried out by the City of Zagreb within its Action Plan.<sup>683</sup>

In July 2024, Integration Coordinators at the local level were appointed as part of the SINERGY project led by OHRRNM.<sup>684</sup> A total of ten coordinators were appointed from the following cities: City of Gospić, City of Karlovac, City of Osijek, City of Pazin, City of Rijeka, City of Sisak, City of Split, City of Sveta Nedjelja, City of Varaždin and City of Zagreb. During the SINERGY project, five meetings of Integration Coordinators will be held at the local level with the aim of exchanging experiences and strengthening local self-government in the integration of persons granted international protection. The first two meetings were held in September and December 2024.

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<sup>680</sup> Information provided by the City of Zagreb, 28 January 2025.

<sup>681</sup> Information provided by the UNHCR Office for Croatia, 18 March 2025.

<sup>682</sup> Information provided by City of Zagreb, 20 September 2024.

<sup>683</sup> More information available at: <https://zagreb.hr/about-us/205335>.

<sup>684</sup> Information provided by the Office for Human Rights and the Rights of National Minorities, 18 February 2025.

As a positive change, OHRRNM pointed out that the City of Split finances a Croatian language course for citizens of third countries. Also, the City of Split plans to create a strategic document that will refer to the integration of citizens of third countries and persons granted international protection.

The OHRRNM also reported that the City of Sisak highlighted the successful cooperation with the Croatian Employment Service, the Red Cross, the Center for Cultural Dialogue and the Center for Stress and Trauma in the field of integration. Also, the City of Karlovac has good cooperation with civil society organizations regarding the integration of foreigners into Croatian society, and activities for the purpose of inclusion are regularly held. The City Society of the Red Cross of Karlovac, in cooperation with the City of Karlovac, launched the Social Supermarket project to provide free distribution of basic food items and hygiene items to the most vulnerable groups of citizens.

The Croatian Red Cross reported that, in cooperation with UNHCR, two workshops on the topic of international protection and integration were organized for professional stakeholders in local communities. The workshops were held in Požega and Bjelovar.<sup>685</sup>

In October and November 2023, UNHCR presented its Municipal Toolkit<sup>686</sup> to over 30 local stakeholders in eastern and southern Croatia, promoting this tool for the effective inclusion of refugees at the local level.<sup>687</sup>

### Information made available

In 2022, the [integration.zagreb.hr](https://integration.zagreb.hr) website, was created. The website contains information on the rights and services provided by the City of Zagreb for applicants for international protection, persons granted international protection and persons under temporary protection. The information is published in Croatian, English, Arabic, Farsi and Ukrainian and refers to services in the fields of social protection, health care, education, employment, free legal aid and cultural activities organised by the cultural centres of the City of Zagreb.<sup>688</sup>

In 2021, the Ministry of Interior published frequently asked questions and answers in regard to the status granted under international protection in several languages.<sup>689</sup>

Basic information for the Integration of Foreigners can be found in an amended guide for integration which was prepared by the Croatian Governmental Office for Human Rights and the Rights of National Minorities in 2019. The guide is available in seven languages (Croatian, English, French, Ukrainian, Arabic, Urdu and Farsi).<sup>690</sup> In 2022, the Office for Human Rights and the Rights of National Minorities published an updated edition of the Guide for Integration in Croatian and Ukrainian.<sup>691</sup>

In February 2023, the Office for Human Rights and the Rights of National Minorities issued a brochure "*The Rights of Persons Granted International and Temporary Protection*". The brochure contains information on the available mechanisms for the protection and promotion of human rights and the suppression of discrimination in Croatia, especially in the context of international and temporary protection. The brochure is available in twelve languages: Arabic, English, Farsi, Filipino, French, Hindi, Croatian, Nepali, Pashto, Spanish, Turkish and Ukrainian.<sup>692</sup>

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<sup>685</sup> Information provided by the Croatian Red Cross, 20 January 2025.

<sup>686</sup> UNHCR, Effective Inclusion of Refugees: participatory approaches for practitioners at the local level, A toolkit by UNHCR and Migration Policy Group, available at: <https://bit.ly/4eqB0fM>.

<sup>687</sup> UNHCR: CROATIA FACT SHEET, February 2024, available in English at: <https://bit.ly/3XwXCFI>.

<sup>688</sup> EMN, EMN Quarterly n. 39, April - June 2022, available at: <https://bit.ly/3RzfrzX>.

<sup>689</sup> Ministry of Interior: Frequently asked questions, available in Croatian at: <https://bit.ly/3jrnat>.

<sup>690</sup> Office for Human Rights and the Rights of National Minorities, *An updated edition of the Integration Guide has been published*, 21 January 2019, available in Croatian at: <https://bit.ly/2Xi52wX>.

<sup>691</sup> Office for Human Rights and the Rights of National Minorities: *An updated edition of the publication Guide for Integration published*, available in Croatian at: <http://bit.ly/3K46LxT>.

<sup>692</sup> Office for Human Rights and the Rights of National Minorities: *Brochure Rights of the persons granted international and temporary protection issued*, available in Croatian at: <http://bit.ly/3lGIJQn>.



In 2022, the Governmental Office for Gender Equality, in cooperation with the Ministry of Interior and UNHCR, published a leaflet intended to inform victims of gender-based violence about available protection options and services. The leaflet is intended primarily for female migrants, refugees and applicants for international protection, although it acknowledges that gender-based violence can be committed against men. It is available in 8 languages (Arabic, Croatian, English, Farsi, French, Kurdish, Turkish and Urdu).<sup>693</sup>

In 2021, the Ministry of Interior created the application “Resettle in Croatia”.<sup>694</sup> The application was created with the aim of providing faster and easier access to information and guidelines for persons who arrive in Croatia under a resettlement programme, and who were granted international protection upon arrival. The application was developed as part of the project “Establishment of a resettlement mechanism” co-financed by AMIF. In addition to information on the different steps, i.e., the procedure in the Republic of Türkiye and after the arrival in the Republic of Croatia for persons from the resettlement programme, the application offers information on the rights that persons acquire after obtaining international protection and how to exercise these rights and obligations in Croatia. The application further offers all persons who have been granted asylum or subsidiary protection in Croatia useful information on all important aspects of life in Croatia from health care, education, work, housing to easier access to activities necessary for daily functioning. The application is available in Croatian, English, Arabic and Kurdish.<sup>695</sup>

On the ‘Help’ website run by UNHCR, persons granted international protection can also find information about their rights, obligations and the services available to them in Croatia.<sup>696</sup>

In 2022, the association RODA (Parents in Action), with the support of UNICEF, created a [website](#)<sup>697</sup> where basic information is provided to families on the move and families with children staying in Croatia.<sup>698</sup> In 2024, the UNICEF Office for Croatia, in cooperation with its implementing partner RODA, upgraded the website. The website includes information on access to healthcare services, nutrition, appropriate care, community resources and support in Croatia, and is intended for parents and caregivers of children aged 0–7, as well as professionals. The website is available in Croatian, French, Ukrainian and Arabic. As part of this collaboration, a needs assessment is also being carried out to gain an in-depth understanding of the experiences and needs of programme users—parents of young and preschool-aged children (0–7 years) who are applicants for international protection, have been granted protection, are foreign workers, or have another legal status in Croatia. The objective is to ensure that all parents/caregivers have access to relevant information through the website on the necessary support and resources, enabling them to effectively fulfil their parental responsibilities, integrate into the community, and provide optimal early childhood support to their children. The results of the assessment will be available in 2025.<sup>699</sup>

The *Count me in Platform* is an outcome of the European-funded project *DIFE – Digital Integration for Equality*. The aim of this project was to support the lifelong learning and education of migrants and members of the Romani community in the EU through the development of a free digital learning platform. The platform contains courses in the fields of active citizenship, labour integration, digital literacy, and health and relationship. It is available in several languages, while the course materials are translated into Arabic, Farsi and Romani. The project was implemented by a consortium of four organizations: Initiative – Centre for Education (Croatia), Adult Education Centre Lendava (Slovenia), Institute for Roma and Minorities Integration (Germany) and Welcome Home International (Belgium).<sup>700</sup>

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<sup>693</sup> Office for Gender Equality, *The Office for Gender Equality published a leaflet for female migrants, refugees and asylum applicants*, available in Croatian at: <https://bit.ly/3FNHzte>.

<sup>694</sup> EMN HR, *Resettle in Croatia*, 4 October 2021, available at: <https://bit.ly/3hRLEQt>.

<sup>695</sup> Application (Re)Settle in Croatia is available via Google Play: <https://bit.ly/3hHzBp4>; and Apple App Store: <https://apple.co/3Mvkihh>.

<sup>696</sup> UNHCR, Help, Website available at: <https://bit.ly/3sPxNNF>; see also videos available at: <https://bit.ly/3nki3RI>.

<sup>697</sup> See: <https://www.parentingincroatia.eu/>.

<sup>698</sup> Information provided by RODA, 6 December 2022.

<sup>699</sup> Information provided by the UNICEF Office for Croatia, 4 February 2025.

<sup>700</sup> More information available at: <https://countmein.academy/about/>.

## Main issues related to inclusion

As reported in previous years, beneficiaries of international protection still face challenges exercising their rights, as detailed in this Chapter. The MIPEX 2020 ranking listed Croatia among the countries categorised as *Equality on paper - Slightly unfavourable*.<sup>701</sup>

The main problems with regards to integration identified are the non-implementation of Croatian language courses, difficulties in exercising the right to health care, delays in preparatory classes for children, and difficulties accessing education. The Ombudswoman reported that persons under international protection were not granted access to the basic Croatian language course offered through the CES voucher scheme, while persons under temporary protection and foreign workers were and are allowed access.<sup>702</sup>

The Croatian Red Cross reported that during 2024, in Zagreb, Croatian language courses were implemented by civil society organizations, but in other cities, beneficiaries did not have any opportunity to attend a Croatian language course. In practice, persons granted international protection still have difficulty finding a general practitioner, and doctors often expect them to be accompanied by an interpreter. Family reunification is also one of the major problems for persons granted international protection, as the procedure is a complicated and lengthy and requires a lot of financial resources. The competent institutions are not flexible and ready to cooperate, so much depends on the capabilities of civil society organizations to assist the beneficiaries.<sup>703</sup>

The association Borders:None reported challenges in accessing the rental market in Zagreb without the mediation of a Croatian national. Additionally, the options for finding housing in Zagreb through governmental support are limited. Accessible Croatian language courses at the intermediate level are scarce, while advanced-level courses are nonexistent. Other persistent challenges highlighted by Borders:None include limited job opportunities in the field of education of persons granted international protection, complex and costly procedures for the nostrification of diplomas for regulated professions, difficulties in accessing healthcare for unemployed persons granted international protection, due to both the limited knowledge of medical staff and the shortage of interpreters who could help beneficiaries of international protection access their rights.<sup>704</sup>

The UNICEF Office in Croatia reported that national systems still lack sufficient inclusivity to respond in a timely manner to the specific needs of children and families granted international protection. The UNICEF Office in Croatia is therefore focused on strengthening the capacities of existing professionals who work directly with children and families in migration, including those granted international protection, with the aim of building more resilient national systems that can provide faster and more effective support to children and their caregivers, including facilitating their integration into Croatian society.<sup>705</sup>

At the local level, the city of Zagreb organised a certified Croatian language course during 2024 (see more under Inclusion policy at the local level above).

The UNICEF Office for Croatia reported that national systems are still not sufficiently inclusive to respond to the specific needs of children and families granted international protection in a timely manner. Therefore, the UNICEF Office for Croatia is focused on strengthening existing professionals who work directly with children and families in migration, including persons granted international protection, with the aim of creating more resilient national systems that enable faster and more effective support for children and their caregivers, including their integration in Croatia. The UNICEF Office for Croatia has established a

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<sup>701</sup> Equality on paper means that immigrants do not enjoy equal opportunities. This group of countries goes only halfway towards providing immigrants with basic rights and a secure future. Policies may encourage the public to see immigrants as subordinates, not equal and not potential citizens. See the Mipex key findings here: <https://www.mipex.eu/key-findings>.

<sup>702</sup> Ombudswoman, Report of the Ombudswoman for 2024, page 174, available at: <https://www.ombudsman.hr/hr/download/izvje-e-pu-ke-pravobraniteljice-za-2024-godinu/?wpdmdl=20339&refresh=67efca50785f31743768144>.

<sup>703</sup> Information provided by Croatian Red Cross, 20 January 2025.

<sup>704</sup> Information provided by Borders:None, 12 March 2025.

<sup>705</sup> Information provided by UNICEF Office for Croatia, 4 February 2025.

Programme Committee to support the implementation of the programme "*Support to Children and Families in Migration in the Protection and Integration Process in Croatia*", which has the role and responsibility to monitor the implementation of the programme and the realization of results, advocate and provide support in ensuring the sustainability of the results and objectives of the Programme, and promote the Programme. The Programme Committee is composed of representatives of the Ministry of Interior, the Ministry of Labour, Pension System, Family and Social Policy, the Ministry of Science, Education and Youth, the Ministry of Health, the Office of the Ombudsman for Children, the Office of the Ombudsman, the Croatian Institute for Social Work, Education and Teacher Training Agency, the Centre for Community Service Provision Zagreb-Dugave, Faculty of Humanities and Social Sciences of the University of Zagreb, and civil society organisations – implementing partners of UNICEF Croatia (RODA – Parents in Action, HURID, Brave Phone, etc.).<sup>706</sup>

The Centre for Peace studies (CPS) reported that in 2024, beneficiaries of international protection encountered a number of institutional barriers as well as discrimination practices in exercising their rights. CPS reported problems relating to Croatian language courses, access to the healthcare system, delays in preparatory classes for children, challenges accessing higher education and exercising rights of the students, and access to the housing system. CPS also reported problems in the recognition of qualifications and notification of diplomas when persons have documents proving their education, as well as a lack of customised procedures for recognition of qualifications when they do not have documents. CPS also pointed out that access to information in institutions is problematic. People often do not receive answers in English but in Croatian, which makes it very difficult for them to find their way around, collect the necessary paperwork, etc.<sup>707</sup> In addition, as a part of the project "*City for Everybody – Building Responsible Action for Inclusive Local Communities*", desk and qualitative research on manifestations of racism and xenophobia in Zagreb was conducted and the research report was made by CPS. The report provides an overview of the current situation, individual sectors in which racialized persons are particularly victims of racism and discrimination, such as housing and employment, and provides an overview of recommendations and good practices.<sup>708</sup> As part of the project "*FRED – For Equality and Diversity, Against Racism*", funded by the European Union through the Citizens, Equality, Rights and Values (CERV) Programme, a study was conducted entitled "*Attitudes Toward Foreigners and Minorities in Croatian Society in 2024: Threat, Encounter, Coexistence?*".<sup>709</sup> The project is led by the CPS, in partnership with the Ombudswoman of the Republic of Croatia, the Centre for Peace, Nonviolence and Human Rights Osijek, and the Irish Network Against Racism (INAR). The main objective of this study, conducted in mid-2024, was to explore the attitudes of adult Croatian citizens toward foreigners and selected minority social groups in Croatian society. An additional objective was to determine whether and to what extent these attitudes have changed over time, particularly in comparison to similar studies conducted in 2013 and 2017. These changes were examined in relation to views on immigrants and minorities, as well as broader perceptions of cultural and ethnic diversity—therefore also touching on issues of discrimination and xenophobia. The study shows that over the past decade, there has been a noticeable increase in prejudice, xenophobia, perceptions of threat, and negative attitudes toward immigration in Croatia, particularly towards specific migrant groups. On the other hand, there are also encouraging findings—for example, a majority of citizens believe that foreigners in Croatia should have the right to protection from discrimination (58%) and the right to equal pay for equal work, just like Croatian citizens (56%).

Are You Syrious? (AYS) reported problems with access to preparatory classes for children and higher education, as well as challenges within the health system.<sup>710</sup>

<sup>706</sup> Information provided by UNICEF Office for Croatia, 4 February 2025.

<sup>707</sup> Information provided by Centre for Peace Studies, 27 February 2025.

<sup>708</sup> Centre for Peace Studies (Lucija Mulać and Cvijeta Senta): *City for Everybody – Building Responsible Action for Inclusive Local Communities* (CFIER), National report – Croatia, available at: [https://www.cms.hr/wp-content/uploads/Cifer\\_national\\_report\\_HR.pdf](https://www.cms.hr/wp-content/uploads/Cifer_national_report_HR.pdf).

<sup>709</sup> Drago Župarić Ilić, Sra Lalić (Centre for Peace Studies): "*Attitudes Toward Foreigners and Minorities in Croatian Society in 2024: Threat, Encounter, Coexistence?*"; available at: <https://www.cms.hr/publikacija/stavovi-prema-strancima-i-manjinama-u-hrvatskom-drustvu-u-2024-godini-prijetnja-susret-suzivot/>.

<sup>710</sup> Information provided by Are You Syrious, 15 January 2025.

As of September 2024, Croatian Red Cross, as UNHCR's implementing partner, was present daily at the Welcome Center (One Stop Shop) of the City of Zagreb to support employees of the City of Zagreb in providing services to applicants for international protection and persons granted international and temporary protection.<sup>711</sup>

JRS reported difficulties in accessing healthcare and finding accommodation for beneficiaries of international protection. They also reported that the language barrier further complicates integration and access to rights.<sup>712</sup>

The [Web platform for integration](#) is maintained by the NGO Mi.<sup>713</sup>

## NGO support to BIPs

To overcome those challenges, beneficiaries are assisted by various NGOs:

In 2024, the **Croatian Red Cross (CRC)** has been involved in improving the integration process in a broader sense, and was also a member of the Coordination of the City of Zagreb for the Integration of Persons Granted International Protection and the Commission for the allocation of education grants to secondary school students and students under the international and temporary protection of the City of Zagreb. Furthermore, as an UNHCR partner, since September 2024, the CRC has been working at the Welcome Center of the City of Zagreb in order to support the employees of the City of Zagreb in providing advisory services to applicants for international protection and persons under international and temporary protection. Before that, the CRC employees, in cooperation with UNHCR, held training for employees of the City of Zagreb on the topic of integration.<sup>714</sup>

In the course of 2024, **Rehabilitation Centre for Stress and Trauma (RCT)**, provided support to victims of torture in overcoming traumatic events and improving integration into the local community. Throughout 2024, RCT provided support to persons granted international protection through individual psychosocial counselling, individual psychological counselling, and assistance with everyday integration, particularly in communication with institutions. In addition, socio-cultural workshops were held, and support was provided for learning the Croatian language and improving digital skills.<sup>715</sup>

In March 2020, the Ministry of Interior and the NGO **"Centre for Cultural Dialogue"** (CCD) concluded an agreement on the allocation of financial resources for the implementation of the project "New Neighbours - inclusion of persons who have been granted international protection in Croatian society", aiming at improving their living conditions (through AMIF). The implementation of the project began in April 2020<sup>716</sup> and the project ended in March 2023.

In March 2024, a new public call was announced for the financing of a project in the area of support provision for the inclusion of beneficiaries of international protection in Croatian society.<sup>717</sup> The decision on the allocation of financial resources for the implementation of the CCD's project "*New Neighbours 2.0 – inclusion of persons granted international protection into Croatian society*" was adopted by the Ministry of Interior only in April 2025.<sup>718</sup> This resulted in the absence of more systematic support for persons under international protection for a period of two years.

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<sup>711</sup> Information provided by Croatian Red Cross, 20 January 2025.

<sup>712</sup> Information provided by JRS, 15 January 2025.

<sup>713</sup> The website is available at: <https://www.irh.hr/>.

<sup>714</sup> Information provided by the Croatian Red Cross, 20 January 2025.

<sup>715</sup> Rehabilitation Centre for Stress and Trauma; Annual Report for 2024, February 2025, available at: <https://rctzg.hr/wp-content/uploads/2025/04/Godisnji-izvjestaj-o-rad-u-za-2024.godinu.pdf>.

<sup>716</sup> EMN, Bulletin number 31, August 2020, available at: <https://bit.ly/3Xppds9>.

<sup>717</sup> Ministry of Interior: Public call for the financing of a project in the area of providing support for the inclusion of beneficiaries of international protection in Croatian society, available at: <https://bit.ly/3z7M5Cf>.

<sup>718</sup> Ministry of Interior: *Decision on the allocation of financial resources for the implementation of the project "New Neighbors 2.0 - Inclusion of Persons with Granted International Protection into Croatian Society"*.

In 2024, **AYS** assisted beneficiaries of international protection with activities on access to the labour market, which in practice meant assisting them in drafting resumes, finding suitable jobs in rapport to beneficiaries' education, work experience and contacting potential employers. AYS also provided individual consultations on the rights of persons under international protection particularly regarding rights from the social welfare system, pension insurance, health care and education. Beneficiaries were also assisted in several health care institutions (health centres, hospitals, dental practice, etc.); in communication with social welfare institutions, in exercising rights from the social welfare system and with enrollment in kindergarten, primary and secondary school, higher education and adult education. Support to school-aged children was also provided in learning Croatian language, mastering school materials, cooperating with schools and mediating in the communication between parents and schools. AYS continued to run a so-called FREE SHOP - a place where applicants for and beneficiaries of international protection can get clothes, shoes, hygiene items, dishes and other household items free of charge. AYS also provided 5 informal initial Croatian language courses for applicants for international protection and beneficiaries of international protection.<sup>719</sup>

In 2024, lawyers of the **Croatian Law Centre**, as UNHCR's implementing partner, provided legal information to beneficiaries of international protection in person, over the phone, WhatsApp and e-mail. In addition, during first half of 2024, CLC continued with the implementation of the family reunification assistance program within the project "Complementary pathways for Southeast Europe - COMP4SEE" financed by AMIF and co-financed by the Office for Cooperation with NGOs of the Government of the Republic of Croatia. The Project aimed to contribute to development of complementary pathways by creating new models of private sponsorships and offering recommendations for the improvement of national family reunification systems. The family reunification assistance program., in addition to the legal aid component, also included other aspects of support, primarily assistance with the translation of documents and financial support for certain aspects of the procedure (for example, payment of consular fees or travel expenses). The project ended at the end of June 2024.

In 2024, the Croatian Law Centre, as an implementing partner of UNHCR, in collaboration with the Croatian Employment Service produced the brochure „*The right to work – applicants for international protection, persons granted international protection and foreigners under temporary protection*”. The brochure provides key information on the right to employment and work, as well as the protection of these rights. The brochure is available in Croatian, English, Ukrainian, Russian, French, Turkish, Arabic and Farsi.<sup>720</sup>

The **Centre for Peace Studies** (CPS) provided different types of support to persons granted international protection. Individual language support was provided, two Croatian language courses were organized and conducted, and guidelines and informational materials related to rights and the functioning of the integration system were developed. Direct support was also provided for visits to institutions and dealing with bureaucratic procedures, helping individuals to better navigate the administrative system. Furthermore, the CPS is a provider of free legal aid, so legal aid regarding various status-related matters was offered to persons granted international protection at CPS premises, as well as via telephone and online.<sup>721</sup>

The **Society for Psychological Assistance** provided continuous psychosocial support to children and family members of persons with international or temporary protection, which helped them face the challenges of integration and everyday life. The focus on individual counseling allowed children to get the

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available at:

<https://eufondovi.mup.hr/UserDocsImages/dokumenti/Odluka%20o%20dodjeli%20financijskih%20sredstava/Odluka%20-%20Novi%20susjedi%202.0.pdf?vel=867966>.

<sup>719</sup> Information provided by Are You Syrious, 15 January 2025.

<sup>720</sup> CLC: brochure „The right to work – applicants for international protection, persons granted international protection and foreigners under temporary protection”, available in in Croatian, English, Ukrainian, Russian at: <https://www.hpc.hr/2024/02/05/izradena-brosura-pravo-na-rad-trazitelj-a-medunarodne-zastite-osoba-s-odobrenom-medunarodnom-zastitom-i-osoba-pod-privremenom-zastitom/> and in French, Turkish, Arabic and Farsi at: <https://www.hpc.hr/2024/08/23/brosura-o-pravu-na-rad-dostupna-i-na-francuskom-turskom-i-farsi-jeziku/>.

<sup>721</sup> Information provided by the Centre for Peace Studies, 27 February 2025.



necessary support, while parents also got the opportunity to participate in counseling meetings, which had a positive effect on family dynamics.<sup>722</sup>

As part of the two-year project *DIDI: Two-Way and Dynamic Integration*, funded by the Ministry of Labour, Pension System, Family and Social Policy, aimed at supporting the integration of persons granted international protection in the Sisak-Moslavina and Karlovac counties, **Civil Rights Project Sisak** (CRP) organized a social gathering with 20 beneficiaries in June 2024, with the goal of promoting economic and emotional empowerment to beneficiaries of international protection. In November, the CRP held a workshop entitled *How to Be More Competitive on the Labour Market*, during which participants received support packages.<sup>723</sup>

The **Festival of Tolerance** promoted refugee inclusion through activities such as: educational programs for schools, which was implemented throughout Croatia and where beneficiaries of international protection participated as panellists; workshops and training for journalists in which persons granted protection participated as guest lecturers; and through marking World Refugee Day by creating murals with refugees.<sup>724</sup>

**JRS** provided assistance in finding suitable accommodation, in conducting Croatian language courses, in the access to the labor market, in the family reunification process, as cultural mediation, through integration workshops and through the intercultural encounters.<sup>725</sup>

## A. Status and residence

### 1. Residence permit

#### Indicators: Residence Permit

- |  |         |
|--|---------|
| 1. What is the duration of residence permits granted to beneficiaries of protection? |         |
| ❖ Refugee status   | 5 years |
| ❖ Subsidiary protection  | 3 years |

There is a difference in duration of residence permit issued to **recognised refugees** (“asylees”) and beneficiaries of **subsidiary protection**. A residence permit shall be issued to an asylee for a period of five years,<sup>726</sup> and to foreigner under subsidiary protection for a period of 3 years.<sup>727</sup>

Both categories have the right to residence in the Republic of Croatia from the day of the delivery of the decision granting international protection, which is demonstrated by their residence permit. The right to residence in Croatia shall be established by the decision granting international protection.<sup>728</sup> The application for issuing a residence permit should be submitted to the competent police administration or police station, according to their place of permanent residence.<sup>729</sup> The application for the residence permit shall be lodged by an asylee and a foreigner under subsidiary protection who is older than 16, and in the case of an asylee and a foreigner under subsidiary protection under 16 years of age, it shall be lodged by a legal representative or a special guardian under the same conditions as those for Croatian nationals.<sup>730</sup>

The residence permit should be issued within 30 days from submission of the application.<sup>731</sup>

<sup>722</sup> Information provided by Society for Psychological Assistance, 13 January 2025.

<sup>723</sup> Information provided by Civil Rights Project Sisak, 15 January 2025.

<sup>724</sup> Information provided by Festival of Tolerance, 10 March 2025.

<sup>725</sup> Information provided by JRS, 15 January 2025.

<sup>726</sup> Article 75(2) LITP.

<sup>727</sup> Article 75(3) LITP.

<sup>728</sup> Article 65(1)-(2) LITP.

<sup>729</sup> Article 75(1) LITP; Article 10(1) Ordinance on the Forms and Data Collections in the Procedure for International and Temporary Protection.

<sup>730</sup> Article 75(4) LITP.

<sup>731</sup> Article 12(1) Ordinance on the Forms and Data Collections in the Procedure for International and Temporary Protection.



An asylee and a foreigner under subsidiary protection are obliged to inform the Ministry of Interior, if they move out of the Republic of Croatia or resides abroad continuously for more than 90 days in a period of 180 days, within 15 days from the date of occurrence of the above-mentioned circumstances.<sup>732</sup> If a beneficiary of international protection does not inform the Ministry of Interior within the prescribed deadline, they will be fined between 130 and 260 euros.<sup>733</sup>

An asylee or a foreigner under subsidiary protection is required to report the loss, disappearance, or theft of their residence permit to the police administration or police station according to the place of the incident or where they became aware of it, within 15 days from the date of becoming aware of the event. The police administration or station that receives the report shall issue a confirmation and notify the police administration or station that issued the residence permit. The police administration or police station responsible for issuing the residence permit shall record the lost, missing, or stolen residence permit as invalid in the Ministry's of Interior Information System. A residence permit that was reported missing but is subsequently found will be returned to the person granted asylum or subsidiary protection, provided that the permit has not been recorded in the Information System as invalid. A residence permit that is found but cannot be returned to asylee or the person granted subsidiary protection to whom it was issued shall be forwarded to the competent police administration or police station that issued it, for cancellation.<sup>734</sup>

According to the Ministry of Interior, 411 residence permits were issued to asylees and 79 to foreigners under subsidiary protection in 2018.<sup>735</sup> No information is available for 2019 and 2020. In 2021, 257 residence permits were issued to asylees, and 24 residence permits to foreigners under subsidiary protection,<sup>736</sup> while in 2022, residence permits were issued to a total of 211 persons who has been granted with international protection status (183 asylees and 28 persons under subsidiary protection).<sup>737</sup> According to the Ministry of Interior, 192 residence permits were issued to asylees and 16 to foreigners under subsidiary protection in 2023.<sup>738</sup> No information is available for 2024.

## 2. Civil registration

According to the Law on State Registries, in the Republic of Croatia, the personal status of citizens (birth, marriage and death) and other information related to those facts are recorded in the State Registries.<sup>739</sup> The registration of a birth of a child into the Birth Register is made on the basis of the oral or written applications to the registrar of the area of origin to which the place where the child was born belongs. If a child is born in a health institution, it is required that a health institution reports it. If a child is born outside a health institution, the father of the child is required to report the child's birth, or the person at whose place of residence the child was born or a mother when she is capable of it, or a midwife, or a doctor who participated in the childbirth. When these persons are not present, or when they cannot report the birth, the person who finds out about the birth is obliged to report it. The birth of a child must be reported within 15 days of the birth.

Marriage is regulated by the Family Law.<sup>740</sup> Preconditions for marriage are divided into those needed for the existence of marriage and preconditions for the validity of marriage. For the existence of marriage, it is necessary for the spouses to be opposite sexes, to have given their consent to enter into marriage and for a civil marriage to be contracted before a registrar or a religious marriage to be contracted in accordance

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<sup>732</sup> Article 64(4)(5) LITP.

<sup>733</sup> Article 94a (3) LITP.

<sup>734</sup> Article 14 (1)-(4) Ordinance on the Forms and Data Collections in the Procedure for International and Temporary Protection.

<sup>735</sup> Information provided by the Ministry of Interior, 28 January 2019.

<sup>736</sup> Croatian Law Centre: *The Croatian Asylum System In 2021 - National Report*, The report was prepared as part of the project "Access to the territory and the asylum system in Croatia - legal support and capacity building" with the financial support of UNHCR; available in Croatian at: <https://bit.ly/3NgBDfc> and in English at: <https://bit.ly/3NBvVpC>.

<sup>737</sup> Croatian Law Centre, *The Croatian Asylum System in 2022 - National Report*. The report was prepared as part of the project "Legal Assistance and Capacity Building for Access to Territory and Asylum in Croatia", with financial support of the UNHCR Croatia; available in English at: <https://bit.ly/434T7RL>.

<sup>738</sup> Information provided by the Ministry of Interior, 8 March 2024.

<sup>739</sup> Official Gazette 96/1993, 76/2013, 98/2019, 133/2022.

<sup>740</sup> Official Gazette 103/15, 98/2019, 47/2020, 49/2023, 156/2023.

with the relevant provision of Family Law. If at the time of entering into marriage any of the preconditions referred to above has not been fulfilled, no legal effects of marriage shall ensue.

For the validity of marriage, it may not have been entered into by a person under the age of eighteen. As an exception, the court may allow a sixteen-year-old person to enter into marriage, provided that the court finds the person mentally and physically mature enough to marry and that the marriage is in accordance with the well-being of that person. In addition, a person incapable of discernment may not enter into marriage. A person deprived of business capacity in making statements related to personal conditions can enter into marriage with their guardian's approval. If the guardian refuses to give permission for marriage, a person deprived of business capacity in making statements related to personal circumstances may submit a proposal to the court for the approval of marriage in accordance with relevant provision of the Family Law.

Marriage cannot be concluded between blood relatives in the direct line, and in the collateral line, sister and brother, half-sister and half-brother, a child with a sister or half-sister, or a brother or half-brother of their parent, children of sisters and brothers and half-sisters and half-brothers. This provision also applies to relationships created by adoption.

This shall also apply to relationships established by adoption. A marriage may not be entered into by a person who is already married or is in a same-sex life partnership registered under the relevant legislation. A marriage that is contracted contrary to the provisions above is not valid and the provisions for annulment shall apply.

Family Law regulates civil marriage and religious marriage with the effects of a civil marriage. Civil marriage is contracted before a registrar, while religious marriage is contracted before an official of a religious community that has a regulated legal relationship thereof with the Republic of Croatia. The spouses must give notice of their intention to enter into a civil marriage in person to the registrar competent for the place where they wish to enter into marriage. They must enclose relevant documents at the registrar's request. Asylees and foreigners under subsidiary protection, when reporting their intention, have to provide the certificate that they have been granted asylum or subsidiary protection and adequate proof of non-existence of another marriage. Adequate proof is considered to be a statement under material and criminal liability made before a public notary or before a registrar where they announce their intention to marry.

The registrar shall verify, on the basis of the spouses' statements and by using other means, whether the preconditions for entering into marriage have been met. If a court decision is needed for entering into marriage to take place, the registrar shall ask the spouses to obtain one. After having verified that the preconditions for entering into marriage have been met, the registrar shall take a statement from the spouses on the choice of the surname.

The spouses shall confirm by their signatures that they understand their personal rights and responsibilities in marriage, as well as the possibility of determining property relations.

The registrar shall determine the date of marriage upon the agreement with the spouses who want to enter into a civil marriage usually in the period between the thirtieth and forty-fifth day since the day of giving the notice of the intention to enter into marriage.

A marriage is contracted in the presence of the spouses, the registrar and two witnesses who have to be of full age and have legal capacity. The spouses who want to enter into a religious marriage shall obtain from the registrar competent for the place where they wish to enter into marriage a certificate of having fulfilled all marriage preconditions.

The official of the religious community before whom the religious marriage has been contracted shall submit to the registrar the document signed by the spouses, the witnesses and the religious community official which confirms that the marriage has been contracted. This document must be submitted to the registrar within five days of the date of the contraction of marriage. The registrar is obliged to record the religious marriage into a marriage register within three days of the day of receipt of the document. Immediately upon entering the records on the contracted marriage into a marriage register, the registrar shall submit the marriage certificate to the spouses. The registrar shall inform the spouses that the marriage certificate from

a national marriage register is a proof that the religious marriage they entered into is equal in effect to a civil marriage.

### 3. Long-term residence

#### Indicators: Long-Term Residence

- |   |    |
|---|----|
| 1. Number of long-term residence permits issued to beneficiaries in 2023: | 24 |
|---|----|

A new Law on Foreigners entered into force on 1 January 2021 and was amended in the course of 2022. One of the novelties introduced in 2021 was the distinction between long-term residence and permanent residence. Long-term residence may be granted to a third-country national who, prior to the day of submission of an application for long term residence, has been granted temporary stay, asylum or subsidiary protection in the Republic of Croatia for an uninterrupted period of five years. A third-country national shall be deemed as having continuously resided in the Republic of Croatia even if they were absent from the country within the five-year period for up to ten months in total for multiple absences, or up to six months for a single absence. At the time of deciding on the application for a long-term residence, the third-country national must have a granted temporary residence, asylum or subsidiary protection in the Republic of Croatia. The third-country national shall not be granted long-term residence if their asylum or subsidiary protection has been annulled.<sup>741</sup>

The five years' residence period required for the approval of long-term residence for asylees or beneficiaries of subsidiary protection, shall be calculated to also include the time before international protection was granted, i.e., to include a half of the time from the day when the application for international protection was lodged until the day when international protection was granted, or the entire period of time if it exceeds 18 months.<sup>742</sup>

A beneficiary of international protection shall submit an application for a long-term residence to the Police Administration or Police Station based on the place of their temporary residence. The Ministry of Interior must approve the granting of long-term residence and an administrative dispute may be initiated against the Ministry's decision.<sup>743</sup>

Long term residence shall be granted to a third-country national who, along with the above conditions:<sup>744</sup>

1. Has a valid foreign travel document;
2. Has means of subsistence;
3. Has health insurance;
4. Knows the Croatian language and the Latin script; and
5. Is not considered to be a threat to public policy or national security.

Refugees (asylees) and beneficiaries of subsidiary protection are not obliged to meet the condition of having a valid foreign travel document.<sup>745</sup>

An application for the issuance of a residence permit shall be submitted by a third-country national on long-term residence within eight days from the day they were granted long-term residence in the Republic of Croatia.<sup>746</sup>

In 2018, eight long term residence status were granted to asylees and seven to foreigners under subsidiary protection. A total of 15 long-term residence permits for asylees and 13 for subsidiary protection beneficiaries were valid at the end of 2018.<sup>747</sup> However, no information is available for 2019 and 2020.

<sup>741</sup> Article 150 (1) (4) Law on Foreigners

<sup>742</sup> Article 151(3) Law on Foreigners.

<sup>743</sup> Article 152(1)(3) Law on Foreigners.

<sup>744</sup> Article 153 (1) Law on Foreigners.

<sup>745</sup> Article 153 (2) Law on Foreigners.

<sup>746</sup> Article 169 (1) Law on Foreigners.

<sup>747</sup> Information provided by the Ministry of Interior, 28 January 2019.

In 2021, four long-term residence permits were approved (three to asylees, one to a beneficiary of subsidiary protection).<sup>748</sup> In 2023, long term residents were granted to 21 asylees and 3 foreigners under subsidiary protection.<sup>749</sup> No information is available for 2024.

#### 4. Naturalisation

Indicators: Naturalisation	
1. What is the waiting period for obtaining citizenship?	8 years
2. Number of citizenship grants to beneficiaries in 2024:	N/A

Requirements for the acquisition and termination of Croatian citizenship are regulated by the Law on Croatian Citizenship.<sup>750</sup>

An application for Croatian citizenship on grounds of naturalisation should be submitted at the competent police administration or police station, where the place of temporary or permanent residence is located. Physically handicapped persons can submit the application via their legal representative or attorney. An application can also be submitted at diplomatic missions or consular offices of the Republic of Croatia abroad.<sup>751</sup>

A foreign citizen who submits an application for Croatian citizenship shall acquire it by naturalisation if they:<sup>752</sup>

1. Have reached the age of eighteen years;
2. Have had their foreign citizenship revoked or they submit proof that they will get a revocation if admitted to Croatian citizenship;<sup>753</sup>
3. Before submitting the application, they have lived at registered places of residence for a period of eight years constantly on the territory of the Republic of Croatia and has been granted a permanent residence permit;
4. Are proficient in the Croatian language and Latin script and is familiar with the Croatian culture and social system;
5. Respect the legal order of the Republic of Croatia, has covered all due taxes and other financial obligations towards public bodies and there are no security related restrictions to accessing Croatian citizenship.

According to the LITP, if refugees or beneficiaries under subsidiary protection are not able for objective reasons to obtain official documents from their country of origin necessary to acquire Croatian citizenship, official documents of the Republic of Croatia shall be taken into account in the procedure to acquire Croatian citizenship, along with other documents they possess, on the basis of which it may be assessed whether they meet the conditions for the acquisition of Croatian citizenship.<sup>754</sup> A decision to reject an application for Croatian citizenship may not be based exclusively on the fact that the necessary official documents of the country of origin have not been submitted.

The manner of testing knowledge of the Croatian language and Latin script, Croatian culture, and the social system is regulated by the Ordinance on the Manner of Testing Knowledge of the Croatian Language and

<sup>748</sup> Croatian Law Centre: *The Croatian Asylum System In 2021 - National Report*, The report was prepared as part of the project "Access to the territory and the asylum system in Croatia - legal support and capacity building" with the financial support of UNHCR; available in Croatian at: <https://bit.ly/3NBvVpC> and in English at: <https://bit.ly/3NBvVpC>.

<sup>749</sup> Information provided by the Ministry of Interior, 8 March 2024.

<sup>750</sup> Official Gazette 53/1991, 70/1991, 28/1992, 113/1993, 4/1994, 130/2011, 110/2015, 102/2019, 138/2021.

<sup>751</sup> Article 24 (3)(4) Law on Croatian Citizenship.

<sup>752</sup> Article 8(1)(5) Law on Croatian Citizenship.

<sup>753</sup> This condition is deemed met if the application was submitted by a stateless person or person would lose their existing nationality by naturalisation in Croatia. If a foreign country does not permit dismissal from its citizenship or it places requirements or dismissal which cannot be fulfilled, a statement of the applicant who has submitted a request will be sufficient to renounce his foreign citizenship under the conditions of acquisition of Croatian citizenship.

<sup>754</sup> Article 77(1)(2) LITP.

In the procedures for acquiring Croatian citizenship by naturalization, knowledge of the Croatian language and Latin script may be demonstrated by:

- a certificate of having passed an exam in Croatian language and Latin script at universities or university departments that offer Croatian language programs and conduct such exams, as well as by certificates issued by secondary schools, the National Centre for External Evaluation of Education, and adult education institutions authorized to conduct exams in the Croatian language and Latin script;
- a certificate of completed primary education (grade certificate), a certificate of completed secondary education (grade certificate, certificate of having passed the state graduation exam, or certificate of the final thesis), or a diploma of completed higher education in the Republic of Croatia;
- a certificate of completed language course or a transcript of records or diploma supplement from a foreign institution of higher education showing at least a B1 level of Croatian language proficiency.<sup>756</sup>

Knowledge of Croatian culture and the social system is demonstrated by completing a questionnaire.<sup>757</sup> An annex containing 110 questions, which serves as the basis for testing knowledge of Croatian culture and the social system, is an integral part of the Ordinance on the Manner of Testing Knowledge of the Croatian Language and Latin Script, Croatian Culture, and the Social System in the Procedures for Acquiring Croatian Citizenship.<sup>758</sup>

The questionnaire consists of 15 questions covering the areas of social system, history, culture, customs, art, literature, sports, economy, tourism, and the geographical position of the Republic of Croatia. The questionnaire, selected at random by an official, is completed independently by the applicant for Croatian citizenship, without consulting other persons, in the presence of an official from the police administration or police station receiving the application, within 60 minutes. The questionnaire is completed by circling only one answer per question or by filling in the requested response. The official immediately grades the questionnaire and informs the applicant whether they have demonstrated knowledge of Croatian culture and the social system. An applicant is considered to have demonstrated knowledge of Croatian culture and the social system of the Republic of Croatia if they correctly answer at least 10 questions on the questionnaire. If the applicant does not demonstrate the required knowledge, the official may, upon request, allow them to review the graded questionnaire.<sup>759</sup>

In 2023, 2 asylees, citizens of Iran, acquired Croatian citizenship. In total 7 asylees were acquired Croatian citizenship (1 citizen of Afghanistan, 2 citizens of Iran, 1 citizen of Sudan, 1 citizen of Ukraine and 2 citizens of Uzbekistan).<sup>760</sup> No information is available for 2024.

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<sup>755</sup> Official Gazette 6/2021, available at: [https://narodne-novine.nn.hr/clanci/sluzbeni/2021\\_01\\_6\\_124.html](https://narodne-novine.nn.hr/clanci/sluzbeni/2021_01_6_124.html).

<sup>756</sup> Article 2 Ordinance on the Manner of Testing Knowledge of the Croatian Language and Latin Script, Croatian Culture, and the Social System in the Procedures for Acquiring Croatian Citizenship.

<sup>757</sup> Article 5 Ordinance on the Manner of Testing Knowledge of the Croatian Language and Latin Script, Croatian Culture, and the Social System in the Procedures for Acquiring Croatian Citizenship.

<sup>758</sup> Article 7 (1) Ordinance on the Manner of Testing Knowledge of the Croatian Language and Latin Script, Croatian Culture, and the Social System in the Procedures for Acquiring Croatian Citizenship.

<sup>759</sup> Article 6 Ordinance on the Manner of Testing Knowledge of the Croatian Language and Latin Script, Croatian Culture, and the Social System in the Procedures for Acquiring Croatian Citizenship.

<sup>760</sup> Information provided by the Ministry of Interior, 8 March 2024.

## 5. Cessation and review of protection status

### Indicators: Cessation

1. Is a personal interview of the beneficiary in most cases conducted in practice in the cessation procedure? ☒ Yes ☐ No
2. Does the law provide for an appeal against the first instance decision in the cessation procedure? ☒ Yes ☐ No
3. Do beneficiaries have access to free legal assistance at first instance in practice? ☐ Yes ☐ With difficulty ☒ No

Cessation of international protection is regulated by the LITP. **Asylum** shall be ceased if:<sup>761</sup>

1. The refugee ("asylee") voluntarily accepts the protection of their country of citizenship;
2. The asylee acquires the citizenship of the country whose protection they may enjoy;
3. The asylee voluntarily returns and resides in the country they left or outside of which they have resided due to fear of persecution;
4. The circumstances in the asylee's country of origin, on the basis of which international protection was approved, cease to exist;
5. The refugee voluntarily re-acquires the citizenship of their country of origin, which they had previously lost.

**Subsidiary protection** shall be ceased if the circumstances on the basis of which it was granted cease to exist or are altered to such an extent that further protection is no longer necessary.<sup>762</sup>

The Ministry of Interior carries out, *ex officio*, the procedure of examining the existence of the above-mentioned presumptions.<sup>763</sup>

After establishing that the circumstances related to the cessation of asylum referred to in point 4. above as well as circumstances related to the cessation of subsidiary protection are of a significant and permanent manner, the Ministry of Interior shall accordingly inform in writing the asylee or beneficiary of subsidiary protection and shall allow them to make an oral statement for the record.<sup>764</sup>

The Ministry of Interior shall issue a decision to revoke the decision approving international protection and a claim may be brought before the Administrative Court within eight days of the day of delivery of the decision.<sup>765</sup>

International protection shall cease by force of law when the asylee or the foreigner under subsidiary protection acquires Croatian nationality or on the death of the asylee or the foreigner under subsidiary protection.<sup>766</sup>

Persons whose decision granting international protection was revoked have the right to free legal aid, meaning that a legal representative can be paid from the State budget to submit a lawsuit and represent the beneficiary before the Administrative Court.<sup>767</sup>

According to the Ministry of Interior, there were no cases of cessation of international protection in 2015, 2016, 2017 or 2018.<sup>768</sup> However, the Ministry continuously examines whether the legal requirements for cessation are fulfilled. This provision applies without exception to all categories of foreigners who have

<sup>761</sup> Article 49(1) LITP.

<sup>762</sup> Article 49(2) LITP.

<sup>763</sup> Article 49(3) LITP.

<sup>764</sup> Article 49(4) LITP.

<sup>765</sup> Article 49(5)-(6) LITP.

<sup>766</sup> Article 49(7) LITP.

<sup>767</sup> Article 72 LITP.

<sup>768</sup> Information provided by the Ministry of Interior, 2 March 2017; 13 February 2018, 28 January 2019.



previously been granted international protection. No information on cases of cessation of international protection is available for 2019 and 2020.

In 2021, subsidiary protection was ceased for one Georgian national pursuant to Art. 49, para. 2 of the LITP.<sup>769</sup> According to the Ministry of Interior, there were no cases of cessation of international protection in 2023.<sup>770</sup> No information is available for 2024.

## 6. Withdrawal of protection status

### Indicators: Withdrawal

1. Is a personal interview of the beneficiary in most cases conducted in practice in the withdrawal procedure? ☒ Yes ☐ No
2. Does the law provide for an appeal against the withdrawal decision? ☒ Yes ☐ No
3. Do beneficiaries have access to free legal assistance at first instance in practice? ☐ Yes ☐ With difficulty ☒ No

According to the LITP, international protection shall be revoked if:<sup>771</sup>

1. Reasons for exclusion are subsequently established;
2. It is established that status was recognised on the basis of incorrectly presented or omitted facts, false presentation of important facts and circumstances, or the use of unreliable documents or other documents which were decisive for the approval of international protection; or
3. The person to whom international protection was granted represents a risk to the national security or public order of the Republic of Croatia.

The Ministry of Interior carries out, *ex officio*, the procedure of examining the existence of the above-mentioned presumptions.<sup>772</sup>

After establishing that circumstances have arisen relating to the revocation of international protection, the Ministry of Interior shall inform in writing the asylee or beneficiary of subsidiary protection of the reasons for revocation and shall allow them to make an oral statement about those circumstances for the record.<sup>773</sup>

The Ministry of Interior issues a decision to revoke the decision granting international protection. A lawsuit may be brought before the Administrative Court against that decision within eight days from the day the decision is delivered.<sup>774</sup>

A third-country national or stateless person who represents a risk to the national security or public order of the Republic of Croatia as provided above, whilst in the Republic of Croatia, shall enjoy rights pursuant to the 1951 Convention, especially in relation to the prohibition of discrimination, freedom of religion, access to courts, education, non-punishment of irregular entry or stay, expulsion and respect of the *non-refoulement* principle.

In 2018, the Ministry of Interior revoked international protection for three persons (two refugees and one beneficiary of subsidiary protection). Out of those, one asylum status of an Afghan national and one subsidiary protection status of unknown citizenship were revoked on the ground that they represented a risk to the national security or public order of the Republic of Croatia, while one asylum status of an Iraqi national was revoked on the basis that reasons for exclusion were subsequently established.<sup>775</sup>

<sup>769</sup> Croatian Law Centre: *The Croatian Asylum System In 2021 - National Report*, The report was prepared as part of the project "Access to the territory and the asylum system in Croatia - legal support and capacity building" with the financial support of UNHCR; available in Croatian at: <https://bit.ly/3NBvVpC> and in English at: <https://bit.ly/3NgBDfc>.

<sup>770</sup> Information provided by the Ministry of Interior, 8 March 2024

<sup>771</sup> Article 50 LITP.

<sup>772</sup> Article 50(2) LITP.

<sup>773</sup> Article 50(3) LITP.

<sup>774</sup> Article 50(4) – (5) LITP.

<sup>775</sup> Information provided by the Ministry of Interior, 28 January 2019.

According to the Ministry of Interior, two asylum status (applications from 2016 and 2017) and three subsidiary protections (applications from 2009) were annulled in 2020.<sup>776</sup>

In 2021, international protection was annulled for four persons.<sup>777</sup> According to the Ministry of Interior, there were no cases of annulment of international protection in 2023.<sup>778</sup> No information is available for 2024.

In 2024, the Constitutional Court rejected a constitutional complaint in a case concerning the annulment of international protection. The constitutional complaint was filed against the judgment and decision of the High Administrative Court of the Republic of Croatia, which rejected an applicant's appeal and upheld the judgment of the Administrative Court in Zagreb, as well as rejected the request for the issuance of a interim measure. By the judgment of the Administrative Court in Zagreb, the applicant's lawsuit for annulment of the decision of the Ministry of the Interior was rejected. That decision had annulled the international protection (asylum) granted to a citizen of Iraq and ordered him to voluntarily fulfill the obligation to leave the European Economic Area within 30 days.<sup>779</sup>

## B. Family reunification

### 1. Criteria and conditions

#### Indicators: Family Reunification

1. Is there a waiting period before a beneficiary can apply for family reunification?  
☐ Yes ☒ No  
❖ If yes, what is the waiting period?
2. Does the law set a maximum time limit for submitting a family reunification application?  
☐ Yes ☒ No  
❖ If yes, what is the time limit?
3. Does the law set a minimum income requirement?  
☐ Yes ☒ No

In Croatia, family reunification is regulated by the LITP,<sup>780</sup> as well as by the Law on Foreigners. At the moment, no requirements in relation to waiting periods before a family member of a beneficiary of international protection can apply for family reunification are prescribed nor is a maximum time limit for applying for family reunification prescribed by the legislation. A minimum income requirement is also not prescribed.

A family member for whom reasons exist for exclusion and for reasons of protection of the national security or public order of the Republic of Croatia shall not have the right to family reunification.<sup>781</sup>

The Croatian Law Centre (CLC), in cooperation with UNHCR Croatia, the Ministry of the Interior and the Ministry of Foreign and European Affairs, created leaflets with information on the procedure for family reunification. The leaflet was published in Croatian, and translated into Arabic, Farsi and English.<sup>782</sup>

<sup>776</sup> Ministry of Interior, *Statistical overview of basic safety indicators and work results in 2020*, available in Croatian at: <https://bit.ly/2QsZP4H>, p. 163.

<sup>777</sup> Croatian Law Centre: *The Croatian Asylum System In 2021 - National Report*, The report was prepared as part of the project "Access to the territory and the asylum system in Croatia - legal support and capacity building" with the financial support of UNHCR; available in Croatian at: <https://bit.ly/3NgBDfc> and in English at: <https://www.hpc.hr/wp-content/uploads/2023/06/The-Croatian-Asylum-System-2021.pdf>

<sup>778</sup> Information provided by the Ministry of Interior, 8 March 2024

<sup>779</sup> Constitutional Court, case number: U-III-5848/2022, available at: <https://sljeme.usud.hr/Usud/Praksaw.nsf/C12570D30061CE54C1258B560036FD20/%24FILE/U-III-5848-2022.pdf>.

<sup>780</sup> Article 66 LITP.

<sup>781</sup> Article 66(5) LITP.

<sup>782</sup> CLC, UNHCR, Ministry of Interior and Ministry of Foreign and European affairs, *Family reunification in Croatia - Information for persons granted international protection*, available in Croatian at: <https://bit.ly/2RfNCgY>; in Arabic at: <https://bit.ly/2V7Prh5>; in Farsi at: <https://bit.ly/2whB6Ge>; and in English at: <https://bit.ly/2Xi6lwe>.

In practice, family reunification procedures remain lengthy and highly bureaucratized and beneficiaries of international protection and their family members experience difficulties in managing the procedure without additional support.

In January 2022, CLC started the implementation of the two years' AMIF funded project "Complementary pathways for Southeast Europe - COMP4SEE". The project aimed to contribute to the development of complementary pathways by creating new models of private sponsorship and by making and advocating recommendations for improving national systems in the area of family reunification. During 2023, within COMP4SEE project, CLC assisted beneficiaries of international protection and their family members via so called family reunification assistance program (assistance program). The assistance program, in addition to the legal aid component, also included other aspects of support, primarily assistance with the translation of documents and financial support for certain aspects of the procedure (e.g., payment of consular fees or travel expenses). The experiences gained from the implementation of the assistance program indicate major challenges within the system. On the one hand, the clients, and on the other, the embassies' employees who receive the applications, are not informed about the specifics of the family reunification procedure in the case of refugee families. In addition, the following challenges were mapped: collection of the necessary documents in the family reunification procedure, as well as related difficulties in legalisation of documents; difficulties in accessing embassies or external service providers for the purpose of submitting a visa application, high costs of the procedure (translation and legalisation of documents, and fees), duration of the procedure, costs of travel to the embassy/external service providers during the procedure and/or to the Croatia.

Through this project, 17 families have been successfully reunited in Croatia. Seventeen individuals granted international protection in Croatia were joined by 23 family members. The COMP4SEE project finished on June 30, 2024.

### 1.1. Eligible family members

According to the LITP both refugees ("asylees") and beneficiaries of subsidiary protection have the right to family reunification<sup>783</sup> with the following family members:<sup>784</sup>

- ❖ the spouse or unmarried partner under the regulations of the Republic of Croatia, and persons who are in a union, which under the regulations of the Republic of Croatia may be deemed to be a life partnership or informal life partnership;
- ❖ the minor child of the marital or unmarried partners; their minor adopted child; the minor child and minor adopted child of a married, unmarried or life partner who exercises parental care of the child;
- ❖ the adult unmarried child of a refugee or beneficiary of subsidiary protection who, due to their state of health is not able to take care of their own needs;
- ❖ the parent or other legal representative of a child;
- ❖ a relative of the first degree in a direct ascending blood line, with whom they lived in a shared household, if it is established that they are dependent on the care of a refugee or beneficiary of subsidiary protection.

However, according to the Law on Foreigners,<sup>785</sup> another relative can also be considered a family member of a third-country national who has been granted asylum or subsidiary protection if there are special personal or serious humanitarian reasons for family reunification in Croatia. In order to prove the existence of serious personal or humanitarian reasons for family reunification, relevant documentation must be submitted, to prove family connection between the third country national and the beneficiary of international protection in Croatia, and the proof of existence of serious personal or humanitarian reasons (excerpt from the registry of births, medical and other documentation).<sup>786</sup>

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<sup>783</sup> Article 66(1) LITP.

<sup>784</sup> Article 4(1) point 18 LITP.

<sup>785</sup> Article 64 (2) Law on Foreigners.

<sup>786</sup> Article 9 (3)(2) Ordinance on the residence of third-country nationals in the

A minor child of a refugee or beneficiary of subsidiary protection who has not formed their own family shall follow the legal status of their legal representative to whom international protection has been granted, on which the Ministry of Interior shall issue a decision.<sup>787</sup> In practice that means that children will be granted asylum or subsidiary protection depending on the status of their parent. However, this is not an automatic process as children should be first granted temporary stay followed by a long term visa to enter Croatia. Once child arrives in Croatia, the parent who has been granted protection submits an application for approval of international protection for the child. The application must be submitted in writing at the Reception Centre for Applicants for International Protection and must contain a signed application of the parent requesting approval of international protection for the minor child in the Republic of Croatia, proof of acquired status (decision granting asylum or subsidiary protection) and the child's birth certificate or other document showing the relationship with the requested child and full and accurate personal data, including personal name, date of birth and citizenship, and place and country of birth.<sup>788</sup>

In the case of family reunification of refugees or beneficiaries of subsidiary protection, for a person who is unable to obtain official documents to prove a specific family relationship, circumstances shall be taken into consideration on the basis of which it may be assessed whether or not such a relationship exists. A decision to refuse an application for family reunification cannot be based exclusively on the fact that no official document exists to prove a specific family relationship.<sup>789</sup>

## 1.2. Family reunification procedure

The family reunification procedure consists of two stages. First, an application for temporary stay is submitted; once temporary stay is granted, an application for the issuance of a long-term visa has to be submitted.

National legislation provides that in the case of reunification with an asylee or a foreigner under subsidiary protection, the procedure is initiated by a family member of the person who has been granted international protection in Croatia, by submitting an application to the competent Croatian diplomatic/consular representation. In practice, if some problems exist and family members cannot reach the competent Diplomatic Mission, some Diplomatic Missions or Consular Offices of the Republic of Croatia allow applications to be submitted at some other Croatian mission. The application for temporary stay based on family reunification may be submitted via secure postal mail (for example DHL).

The deadline from the Law on General Administrative Procedure is applicable in the procedure for granting temporary stay, which means that the deadline to make a decision and deliver it to the applicant is 30 days from the date of submission of the complete application. In cases of conducting an examination procedure, the deadline is 60 days from the date of submission of the complete application.<sup>790</sup> However, the deadline does not start to run when the application and documentation are received by competent embassy. Decision making on application for temporary stay for the purpose of family reunification is the competence of the police department or police station according to the place of residence or intended residence of the citizen of a third country. Therefore, the above-mentioned deadlines begin to run from the day the complete application is received in the competent police administration or police station.<sup>791</sup> Once temporary stay for the purpose of family reunification is granted, the person has to apply for a long-term visa to enter Croatia. The family member, if over 12 years of age, has to appear in person at the embassy or external service provider to make an application for a visa to enter Croatia and provide biometric data. The legal time limit for issuing the visa is 15 days from the date of submission of the admissible application for a long-term visa. However, this period can be extended up to a maximum of 45 days, if there are justified reasons to do so.<sup>792</sup>

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<sup>787</sup> Article 66 (2) LITP.

<sup>788</sup> Ministry of Interior: Frequently asked questions-International Protection, available in English at: <https://bit.ly/3KOLbNy>.

<sup>789</sup> Article 66(6) LITP.

<sup>790</sup> Article 101 Law on General Administrative Procedure.

<sup>791</sup> EMN, Ad-Hoc Query on 2023.26 Family reunification for beneficiaries of international protection, available in English at: <https://bit.ly/3L9as5v>.

<sup>792</sup> Article 37(6) Law on Foreigners.

In practice, the whole procedure lasts approximately at minimum six to nine months, and in some cases even a year or more from the date of submission of an application for temporary stay up until the family member come to Croatia.

All family members of asylees and foreigners under subsidiary protection shall regularise their residence pursuant to the provisions of the Law on Foreigners in order to be able to enter Croatia, which means that they should submit an application for temporary stay.

Family members of asylees and foreigners under subsidiary protection who regularise their stay pursuant to the provisions of the Law on Foreigners have to fulfil the following requirements:

- ❖ justify the purpose of temporary stay,
- ❖ hold a valid foreign travel document,
- ❖ when applying for temporary stay for the first time, provide a document proving that s/he has not been convicted of criminal offences by a final ruling, which has been issued by their home country or a country in which s/he has resided for more than a year immediately prior to arriving in the Republic of Croatia, however this proof does not need to be submitted for a third-country national until he/she is 14 years of age,
- ❖ has not been forbidden to enter into the Republic of Croatia and stay in the Republic of Croatia, or if no alert has been issued in SIS (Schengen Information System) for the purpose of forbidding his entry,
- ❖ does not pose threat to public policy, national security or public health.<sup>793</sup>

However, they do not have to provide proof of health insurance and proof of means of subsistence in order to be granted a temporary stay for the purpose of family reunification.<sup>794</sup> If, during the procedure for granting temporary stay, the close family member cannot provide proof of the existence of a certain familial relationship with a third-country national who has been granted international protection, other proof of the existence of such relationship can also be taken into account, which is assessed in line with the legislation governing the general administrative procedure.<sup>795</sup>

A temporary stay permit shall be issued with a period of validity of up to one year and the validity of the foreign travel document should be for three months beyond the period of validity of the temporary stay permit.<sup>796</sup> However, in practice, the validity of one year of temporary stay is running from the day of granting, meaning that a few months of one year validity can pass before a person actually arrives in Croatia.

According to the Ministry of Interior, there were 39 applications for family reunification in 2018. 29 applications were approved and 10 were still pending at the end of 2018.

In 2021, total of 60 applications for temporary stay were submitted for the purpose of family reunification with persons granted international protection.<sup>797</sup>

In 2022, a total of 64 requests for family reunification with beneficiaries of international protection were submitted, and by the end of 2022, 21 requests were being assessed, while 43 requests were approved. The largest number of requests were submitted by nationals of Syria, Iraq and Iran.<sup>798</sup>

In 2024, a total of 95 applications for temporary stay based on family reunification with beneficiaries of international protection were submitted, and by the end of 2024, 37 applications were pending, 7

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<sup>793</sup> Article 59(1) Law on Foreigners.

<sup>794</sup> Article 66 (1) Law on Foreigners.

<sup>795</sup> Article 66 (2) Law on Foreigners.

<sup>796</sup> Article 61 (1),(2), (5) Law on Foreigners.

<sup>797</sup> Croatian Law Centre: *The Croatian Asylum System In 2021 - National Report*, The report was prepared as part of the project "Access to the territory and the asylum system in Croatia - legal support and capacity building" with the financial support of UNHCR; available in Croatian at: <https://bit.ly/3NgBDfc> and in English at: <https://bit.ly/3NBvVpC>.

<sup>798</sup> Croatian Law Centre, *The Croatian Asylum System in 2022 - National Report*. The report was prepared as part of the project "Legal Assistance and Capacity Building for Access to Territory and Asylum in Croatia", with financial support of the UNHCR Croatia: available in English at: <https://bit.ly/434T7RL>.

procedures were suspended, while 51 applications were approved. The largest number of applications were submitted by nationals of Syria (53), Eritrea (6), Iran (6) and the DR Congo (5).<sup>799</sup>

As reported by the Ombudswoman for Children, in 2024, four temporary stays were approved to children for the purpose of reunification with persons with approved international protection relating, and all cases relate to reunification with the father.<sup>800</sup>

## 2. Status and rights of family members

A minor child who has not started their own family and who has joined a person who has been granted international protection in Croatia acquires the legal status of their representative who has been granted international protection,<sup>801</sup> which means that children will be granted asylum or subsidiary protection depending on the status of the family member that they reunite with. As previously stated, in order to enter Croatia, a child must have been granted temporary stay, and when a minor child of a person who has been granted international protection comes to Croatia, the parent who has been granted protection submits an application for international protection for the child.<sup>802</sup>

Other family members are granted temporary stay in accordance with Law on Foreigners.

A family member of an asylee or beneficiary of subsidiary protection who is legally resident in Croatia shall be entitled to the same rights as beneficiaries of international protection.<sup>803</sup>

## C. Movement and mobility

### 1. Freedom of movement

Beneficiaries of international protection have freedom of movement within the State and are not assigned specific geographic regions within the country.

According to the LITP, asylees and beneficiaries of subsidiary protection have the right to social welfare pursuant to the regulations governing the domain of social welfare of Croatian citizens.<sup>804</sup> However some rights from the social welfare system can vary depending on local self-administration and regional self-administration.

### 2. Travel documents

There is a difference in the type and duration of travel documents issued to refugees and beneficiaries of subsidiary protection. Asylees are issued a passport for refugees valid for 5 years,<sup>805</sup> while foreigners under subsidiary protection are issued special passport for foreigners, valid for 2 years.<sup>806</sup>

Recognised refugees (asylees) can travel within the EU without a visa, while foreigners under subsidiary protection may be required to apply for a visa in order to travel to other EU countries.

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<sup>799</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).

<sup>800</sup> Ombudswoman for Children: *Report on the work of the Ombudswoman for Children in 2024*, page 200, available at: <https://dijete.hr/hr/download/izvjesce-o-rad-u-pravobraniteljice-za-djecu-za-2024-godinu/>.

<sup>801</sup> Article 66 (2) of the LITP: A minor child of an asylee and a foreigner under subsidiary protection who has not started his/her own family follows the legal position of a legal representative who has been granted international protection, which shall be decided upon by the Ministry.

<sup>802</sup> Ministry of Interior, Most frequently asked questions - international protection, available at: <https://bit.ly/3N9uhvi>.

<sup>803</sup> Article 66(4) LITP.

<sup>804</sup> Article 73 LITP.

<sup>805</sup> Article 75(5) LITP.

<sup>806</sup> Article 75(6) LITP; Article 6(3) Law on Foreigners.



A special travel document for foreigners may be issued to a foreigner who has been granted subsidiary protection and is unable to obtain a national travel document due to no fault of their own.<sup>807</sup> Such a special travel document for foreigners is valid for a 2-year period.<sup>808</sup>

The request for both passport for refugees and special passport for foreigners should be submitted to the competent police administration or police station.

Beneficiaries are requested to inform the Ministry of Interior, if they move out of the Republic of Croatia or reside abroad continuously for more than 90 days in a period of 180 days, within 15 days from the date of occurrence of the mentioned circumstances.<sup>809</sup> An asylee or a foreigner under subsidiary protection who moves away from the Republic of Croatia or stays abroad continuously for more than 90 days in a 180-day period, without informing the Ministry within 15 days of the occurrence of the aforementioned circumstances shall be fined in the amount of EUR 130.00 to EUR 260.00.<sup>810</sup>

A total of 15 special travel documents for individuals with subsidiary protection were issued in 2024.<sup>811</sup>

## D. Housing

### Indicators: Housing

- |   |               |
|---|---------------|
| 1. For how long are beneficiaries entitled to stay in reception centres?        | 60 or 30 days |
| 2. Number of beneficiaries staying in reception centres as of 31 December 2024: | Not available |

The amendments to the LITP, which were adopted in 2023 introduced novelties with regards to accommodation of beneficiaries of international protection.

Although in practice, even before amendments of LITP, beneficiaries used to stay in the Reception Centre for Applicants for International Protection for some time while appropriate subsidised accommodation was not found, that was not regulated by LITP. According to amendments to the LITP beneficiaries of international protection now have the right to accommodation in the Reception Centre for Applicants for International Protection for a maximum of 60 days until they are provided with accommodation in an adequate housing unit if, within eight days from the day of registration of their permanent residence, they submit an application for accommodation to the competent regional office of the Croatian Institute for Social Work (hereinafter: competent regional office). The competent regional office shall allow the application for *restitutio in integrum* to beneficiaries of international protection who, due to justified reasons, miss the deadline for submitting an application for accommodation to the competent regional office, if, within eight days from the end of the cause that made them miss the deadline, they submit an application for *restitutio in integrum*, together with the application for accommodation. After the expiry of three months from the day the deadline was missed, *restitutio in integrum* cannot be requested. If an asylee or a foreigner under subsidiary protection, while accommodated in the Reception Center, is absent from the center for more than eight days without notifying the Ministry of Interior beforehand, they shall lose the right to accommodation in the Reception Center. If an asylee or a foreigner under subsidiary protection, while accommodated in a Reception Center, is absent from the center for more than eight days and has previously notified the Ministry of Interior thereof, the allocated room in the Reception Center shall be kept for a maximum of 15 days from the date of notification to the Reception Center. An asylee or foreigner under subsidiary protection who has financial resources or property with which is able to maintain himself/herself has the right to accommodation in the Reception Center for a maximum of 30 days from the day of the delivery of the decision on granting international protection.<sup>812</sup>

<sup>807</sup> Article 8(1) Law on Foreigners

<sup>808</sup> Article 65(8) Ordinance on stay of third country nationals in the Republic of Croatia.

<sup>809</sup> Article 64(4) point 5. LITP.

<sup>810</sup> Article 94a(3) LITP.

<sup>811</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).

<sup>812</sup> Article 67b LITP.

Asylees and foreigners under subsidiary protection have the right to accommodation if they do not possess the financial means or property to support themselves, for a maximum of two years from the date of delivery of the decision granting international protection. The procedure for recognising the right to accommodation is initiated by the submission of a request to the competent regional office, *i.e.*, the regional office in the place of permanent residence of the asylee and foreigner under subsidiary protection. If the regional office establishes that the asylee or foreigner under subsidiary protection has financial resources or property with which they could participate in the payment of accommodation costs, it shall decide that the person must participate in the payment of accommodation costs by making payment into the account of the ministry responsible for housing affairs. If the regional office, in a procedure within its competence, establishes, after the decision recognising the right to accommodation becomes enforceable, that the asylee or foreigner under subsidiary protection has the financial resources or property with which they could participate in the payment of accommodation costs, it shall issue a new decision recognising the right to accommodation of the asylee or foreigner under subsidiary protection and establish the obligation to participate in the payment of accommodation costs. An asylee and a foreigner under subsidiary protection, after the cessation and revocation of international protection and the re-approval of international protection, shall have the right to accommodation in proportion to the unused period of the total duration of accommodation.

The right to accommodation of an asylee and foreigner under subsidiary protection shall cease in the following cases:

- ❖ upon the expiry of the two years' time limit;
- ❖ upon personal request;
- ❖ if they refuse the accommodation provided without justified reason;
- ❖ if they do not stay at the registered address continuously for more than 30 days without a justified reason;
- ❖ if it is determined that s/he does not meet the conditions for recognition of the right to housing;
- ❖ if it is determined that s/he does not take care of the provided accommodation with the due care;
- ❖ if it is established that they uses the accommodation provided contrary to its purpose.

Save in the case referred to in item 1 above, the competent regional office, after establishing in the prescribed procedure the conditions referred to in items 2 to 7 above, shall set aside the decision and shall issue a new decision establishing the termination of the right to accommodation.

An appeal may be lodged against the decision recognising the right to housing, the decision recognising the right to housing and participation in the payment of accommodation costs and the decision establishing the termination of the right to accommodation, within 15 days from the date on which the decision is delivered. The appeal does not delay the enforcement of the decision. The ministry responsible for social welfare shall issue a decision on the appeal, against which a lawsuit may be filed with the competent administrative court within eight days of the date of delivery of the decision.

Enforceable decisions shall be delivered to the ministry responsible for housing and to the Ministry of Interior.

If the following circumstances no longer exist (person has financial resources or property with which they could participate in the payment of accommodation costs; if a person do not stay at the registered address continuously for more than 30 days without a justified reason; if it is determined that person does not meet the conditions for recognition of the right to housing), as well as in the case where the right to accommodation ceased due to a personal request, the asylee and the foreigner under subsidiary protection may re-apply for housing.

Exceptionally, at the request of the beneficiary of international protection and with the prior consent of the ministry responsible for housing affairs, an asylee and a foreigner under subsidiary protection may be permitted to temporarily use a housing unit that is owned by the Republic of Croatia after the expiration of two years for the maximum period of two more years.<sup>813</sup>

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<sup>813</sup> Article 67 LITP.

Pursuant to the decision recognising the right to accommodation, the ministry responsible for housing shall secure to asylees and foreigners under subsidiary protection housing units that are the property of the Republic of Croatia or are at the disposal of the ministry as per lease agreements concluded with third parties.

The ministry responsible for housing shall sign a contract on lease or sublease of the housing unit with the asylee and foreigner under subsidiary protection whose right to accommodation is recognised, for a maximum period of two years from the date on which the decision granting international protection becomes enforceable. The contract on the lease or sublease shall define mutual rights and obligations.

Funds for the costs of accommodation shall be earmarked in the State Budget of the Republic of Croatia under the item for the ministry responsible for housing.

The provision of accommodation also includes the process of finding, adapting, furnishing, maintaining, and the settlement of utility costs and leasing costs for the housing unit provided.<sup>814</sup>

The Ordinance on participation of asylees, foreigners under subsidiary protection and foreigners under temporary protection in the payment of accommodation costs prescribes that when it is determined that the beneficiary under international protection, possess property, in the period while he / she is provided with subsidised accommodation, the beneficiary should participate in the payment of accommodation costs.

Centre for Peace Studies (CPS) reported that two years of subsidised accommodation for beneficiaries of international protection would be enough if the other integration measures would work, such as high-quality and easily accessible and comprehensive language courses, easier recognition of existing qualifications, opportunities for retraining and additional training, and easier job search.<sup>815</sup>

## **E. Employment and education**

### **1. Access to the labour market**

Beneficiaries of international protection have the right to work in the Republic of Croatia, without a residence and work permit or certificate of registration of work.<sup>816</sup> Both asylees and foreigners under subsidiary protection have access to the labour market, without distinction.

The main obstacle to access the labour market remain the language barrier and the lack of language courses, which is a precondition for successful integration. However, in practice many beneficiaries are working.

Croatian Red Cross<sup>817</sup>Centre for Peace Studies (CPS),<sup>818</sup> Borders None,<sup>819</sup> and Are You Syrious<sup>820</sup> also reported persisting problems with Croatian language courses.

AYS reported that a major ongoing issue is the absence of formal language courses funded by the State Budget, which would enable faster access to the labor market and higher education. This is particularly problematic for beneficiaries of international protection who are accommodated outside of Zagreb, as their access to organizations providing similar services is limited. The City of Zagreb funded three Croatian language courses organized by AYS as part of the implementation of the Integration Action Plan. Language learning programs are conducted through the SUVAG School of Foreign Languages, covering multiple levels (A1, A2, and B1). In addition, exams for obtaining official language proficiency certificates at B1 and C2 levels were organized, all under the auspices of the City of Zagreb.

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<sup>814</sup> Articles 67a LITP

<sup>815</sup> Information provided by the Centre for Peace Studies, 27 February 2025.

<sup>816</sup> Article 68(1) LITP.

<sup>817</sup> Information provided by Croatian Red Cross, 20 January 2025.

<sup>818</sup> Information provided by Centre for Peace Studies, 27 February 2025.

<sup>819</sup> Information provided by Borders None, 12 March 2025.

<sup>820</sup> Information provided by Are you Syrious, 15 January 2025,

Regarding employment, CPS pointed out the challenges in the recognition of qualifications and nostrification of diplomas when people have documents proving their level of education, as well as the absence of adapted procedures for recognising qualifications when they do not possess documents. CPS also reported there are insufficiently available re-training programs that are closely related to the lack of knowledge of the Croatian language.<sup>821</sup>

Many other NGOs such as JRS, CPS, the Rehabilitation Centre for Stress and Trauma, Are you Syrious (AYS), CRP Sisak also provide assistance during integration. The Integration Centre "SOL", which is run by JRS and was opened in 2018, provides support and guidance to individuals and families in the Republic of Croatia, who have been granted international protection, in their integration process.<sup>822</sup>

The Croatian Law Centre, in cooperation with UNHCR and CES, prepared leaflet on the right to work for applicants for international protection, persons granted international protection and foreigners under temporary protection.<sup>823</sup>

The Croatian Employment Service (CES) is responsible for the implementation of measures in the field of employment of foreigners, with particular emphasis on asylees and foreigners under subsidiary protection. According to the Law on the Labour Market, asylee and foreigner under subsidiary protection and foreigner under temporary protection, as well as their family members may apply to the CES. According to this Law, they are equal with Croatian citizens in terms of rights and obligations.<sup>824</sup>

When applying for inclusion in the registry of unemployed persons, CES assigns employment counsellors to beneficiaries of international protection. They provide assistance and information about available jobs, how to compile resumes and applications to employers, and gives them the opportunity to use measures an active policy of employment and the exercise of other rights. They also inform them about their obligations as unemployed persons.<sup>825</sup>

To access the assistance provided by CES, a person should register with the CES by e-mail or by visiting its regional offices. In order to register with CES, a person need an identity card issued by the Ministry of Interior, proving their immigration status in Croatia, a personal identification number ('OIB,' in Croatian), and if available, a proof of any education or training a person may have completed (not mandatory).<sup>826</sup>

According to CES, 38 asylees (of which 21 women), 7 foreigners under subsidiary protection (of which 3 women), 5 members of families of persons that were granted international protection (of which 3 women) and 35 applicants for international protection (of which 13 women) were inscribed in their registry as unemployed on 31 December 2024.<sup>827</sup> According to the data of the CES from January 1 until December 2024, 74 asylees, 14 persons under subsidiary protection, 8 members of families of persons under international protection and 53 applicants for international protection were provided individual counselling at CES.

Through the CSE's mediation during 2024, 101 people were employed (56 asylees, 9 foreigners under subsidiary protection, 4 members of families of persons under international protection and 32 applicants for international protection).

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<sup>821</sup> Information provided by Centre for Peace Studies, 27 February 2025.

<sup>822</sup> JRS, 'Refuge Integration Centre "SOL" opened', 2018, available at: <https://bit.ly/3chtSBs>.

<sup>823</sup> Leaflet was created as part of the project 'Legal Assistance and Capacity Building for Access to Territory and Asylum in Croatia' funded by UNHCR, available in several languages at: <https://bit.ly/3RyR84W> and <https://www.hpc.hr/2024/08/23/brosura-o-pravu-na-rad-dostupna-i-na-francuskom-turskom-i-farsi-jeziku/>.

<sup>824</sup> Article 14 Law on the Labour Market.

<sup>825</sup> Croatian Association of Social Workers: *Handbook- The role of social welfare in the process of integration of persons with international protection*, available at: <https://bit.ly/3xhMv64>.

<sup>826</sup> Croatian Law Centre: brochure „The right to work – applicants for international protection, persons granted international protection and foreigners under temporary protection, available in English at: <https://bit.ly/4ctotXh>.

<sup>827</sup> Information provided by the Croatian Employment Service, 27 January 2025.

In addition, 4 asylees and 16 applicants for international protection were included in active employment policy measures.

During the past years, persons under international and temporary protection have been included in education and training programs through the voucher system. These persons can apply under the same conditions as Croatian citizens, provided that they know Croatian or English well enough to follow the educational program and if they have passed the process of recognizing a foreign educational qualification. The language barrier is recognized as a significant obstacle in finding employment. The Ministry of Labour, Pension System, Family and Social Policy initiated the development and financing of the Croatian language learning program. These programs include short educational courses in the Croatian language in several key sectors, including construction, tourism and catering, trade and services, and the processing and the food industry. This language learning program is integrated into the voucher system for the education of employed and unemployed persons. At the meeting of the management board of CES held in February 2024, amendments were adopted to the Terms and Conditions and the method of using funds for the implementation of Voucher Education for the acquisition of competencies necessary for work, which introduce the possibility of financing the learning of Croatian as a foreign language through the voucher system. Foreigners under temporary protection can, among others, submit requests for attending the program of learning Croatian as a foreign language, which is carried out by service providers with the consent of Ministry of Labour, Pension System, Family and Social Policy.<sup>828</sup> However, persons under international protection are not allowed access to the Croatian language course offered under the voucher program of the Croatian Employment Service.<sup>829</sup>

In January 2024, in partnership with the Croatian Employment Service (CES), UNHCR organized a training for CES refugee employment counsellors. The training included dedicated sessions on cooperation with UNHCR and civil society organizations; communication with communities; prevention of sexual exploitation and abuse, and identification and referral of gender-based violence and trafficking survivors. The newly published joint brochure on the right to work for asylum seekers and refugees was also presented.<sup>830</sup> The brochure is available in Croatian, Arabic, English, Farsi, French, Russian, Turkish and Ukrainian.<sup>831</sup>

## 2. Access to education

According to the LITP, beneficiaries of international protection have the right to elementary, secondary and higher education under the same conditions as Croatian citizens, pursuant to separate regulations.<sup>832</sup>

Asylees and foreigners under subsidiary protection shall exercise the right to adult education pursuant to the regulations on adult education as well as the right to recognition of foreign qualifications, both under the same conditions as Croatian citizens.

For asylees and foreigners under subsidiary protection, who for justified reasons are not able to provide the necessary documentation to prove their foreign qualifications, an assessment of their prior learning shall be conducted. The assessment of the prior learning of beneficiaries of international protection shall be conducted by a competent body, pursuant to the regulations governing regulated professions and recognition of foreign vocational qualifications.

A decision to refuse an application for recognition of foreign vocational qualifications cannot be based exclusively on the fact that no official documents exist to prove a specific foreign vocational qualification.

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<sup>828</sup> Information provided by the Croatian Employment Service, 27 January 2025.

<sup>829</sup> Information provided by Centre for Peace Studies, 27 February 2025.

<sup>830</sup> Information provided by the UNHCR Office for Croatia, 18 March 2025.

<sup>831</sup> Versions in various languages are available via the following links: <https://www.hpc.hr/2024/08/23/brosura-o-pravu-na-rad-dostupna-i-na-francuskom-turskom-i-farsi-jeziku/>; <https://www.hpc.hr/2024/02/05/izradena-brosura-pravo-na-rad-trazitelja-medunarodne-zastite-osoba-s-odobrenom-medunarodnom-zastitom-i-osoba-pod-privremenom-zastitom/>

<sup>832</sup> Article 70 LITP.

If an asylee or foreigner under subsidiary protection does not have sufficient financial resources available, the translation of foreign documents for the purpose of recognition of foreign qualifications shall be provided from the State Budget under the item of the Ministry competent for education.

Challenges in the recognition of qualifications and nostrification of diplomas when people have documents proving their level of education, as well as the absence of adapted procedures for recognising qualifications when they do not possess documents were reported by Centre for Peace Studies (CPS). CPS also reported there are insufficiently available re-training programs that are closely related to the lack of knowledge of the Croatian language.<sup>833</sup>

However, in 2024, the Ordinance on the Method of Application and Implementation of the Validation of Prior Learning entered into force.<sup>834</sup> According to the Ordinance, the validation of prior learning may include the recognition of sets of learning outcomes and the assessment of competencies acquired through non-formal and informal learning.<sup>835</sup> Persons who have been granted international or temporary protection are also eligible to undergo the validation process.<sup>836</sup>

During 2022, the Ministry of Science and Education organised 23 courses of Croatian language, history and culture for asylees and foreigners under subsidiary protection with the aim of their inclusion in Croatian society. In the same period, documentation (diplomas and certificates) were translated for 15 asylees and foreigners under subsidiary protection. Five persons under international protection were enrolled at the following universities: Faculty of Law, Faculty of Political Sciences, Faculty of Mining and Geology, Faculty of Architecture and Faculty of Civil Engineering, while only one refugee student is the beneficiary of a stipend.<sup>837</sup>

However, in September 2022, the Ministry of Interior took the decision to terminate the agreement with the Ministry of Science and Education, among other things, due to the fact that Croatian language courses were not held.<sup>838</sup>

At the local level, a Croatian language course, organized by the City of Zagreb, was held in 2024 for applicants for international protection, persons granted international or temporary protection, and foreign workers with residence and work permits, with the possibility of taking an exam and obtaining a certificate of knowledge of the Croatian language. In addition, the Croatian language course was conducted by 6 civil society organizations selected through a public call for expressions of interest of civil society organizations to participate in the implementation of the Action Plan of the City of Zagreb. The participants mostly attended language courses at the entry level (A1, A2 and B1). The free Croatian language course was attended by 443 participants, while 10 people passed the verified exam without attending the course. In addition, a public call for financial support for the education of high school students and students with granted international or temporary protection for the year 2024 was published by the City of Zagreb. 75 grants in the amount of EUR 2,000 per student were foreseen. Subsidies were paid once from the Budget of the City of Zagreb for 2024.<sup>839</sup>

Centre for Peace Studies (CPS) reported several problems in the educational system: problems with preparatory classes for children; lack of preparedness of schools; insufficient number of teaching assistants; problems in realising the right to higher education; problems in exercising the majority of rights enjoyed by regular students, such as the right to subsidised accommodation and food and the possibility of

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<sup>833</sup> Information provided by Centre for Peace Studies, 27 February 2025.

<sup>834</sup> Official Gazette 79/2024, available at: [https://narodne-novine.nn.hr/clanci/sluzbeni/2024\\_07\\_79\\_1339.html](https://narodne-novine.nn.hr/clanci/sluzbeni/2024_07_79_1339.html)

<sup>835</sup> Article 2 (1) Ordinance on the Method of Application and Implementation of the Validation of Prior Learning.

<sup>836</sup> Article 3 (1) Ordinance on the Method of Application and Implementation of the Validation of Prior Learning.

<sup>837</sup> Croatian Law Centre, *The Croatian Asylum System in 2022 - National Report*. The report was prepared as part of the project "Legal Assistance and Capacity Building for Access to Territory and Asylum in Croatia", with financial support of the UNHCR Croatia: available in English at: <https://bit.ly/434T7RL>.

<sup>838</sup> Ministry of Interior: Decision on the cancellation of the Decision on the allocation of financial resources for the implementation of the project "Integration of asylees and foreigners under subsidiary protection into Croatian society, education and preparation for inclusion in the labor market"; available in Croatian at: <https://bit.ly/3lzxqtk>.

<sup>839</sup> Information provided by the City of Zagreb, 28 January 2025.



receiving a scholarship; difficulties with the recognition of qualifications and nostrification of diplomas when persons have documents proving their education, as well as a lack of customised procedures for recognition of qualifications when they do not have documents. CPS reported that schools are often not informed about the rights of persons under international protection, and that it is questionable whether they have received the necessary support from the ministry responsible for education. Within the framework of the project "*Thinking of integration process as a two-way inclusion, 2incING*" in 2024, CPS continued working on strengthening the advocacy capacities of refugee and migrant activists. They organized an advocacy meeting on the topic of higher education, led by refugee and migrant activists, which was attended by representatives of the Ministry of Science, Education and Youth, the Agency for Science and Higher Education, various research institutes, and more than 10 representatives of Zagreb-based universities. The aim of the meeting was to present the obstacles persons granted international protection face in accessing higher education, as well as the challenges and barriers various migrant groups encounter in accessing student rights.<sup>840</sup>

The Ombudswoman for Children, also underlined that sometimes children have preparatory classes in other schools, therefore losing part of the classes at their schools. She further stressed that 140 hours of Croatian language classes are not sufficient for a child to independently participate in education. In addition, there are still no textbooks that are adapted to children from other speaking areas.<sup>841</sup>

The UNICEF Office in Croatia reported that in 2024 standardized tests for assessing Croatian language proficiency in non-native speaking students have been developed and printed in cooperation with the National Centre for External Evaluation of Education. Schools can apply free of charge to administer these tests, and the results provide schools with a more objective insight into the Croatian language proficiency of non-native students.<sup>842</sup>

In 2022, the new Law on Recognition and Evaluation of Foreign Educational Qualifications entered into force.<sup>843</sup> The Law prescribes the possibility of evaluating foreign educational qualifications for the purpose of continuing education at the same or higher level of education and for the purpose of accessing the labour market for beneficiaries of international and temporary protection and their family members.

At the end of June 2023, the Ordinance on conditions and methods of exercising the right of students in regular status to subsidised housing entered into force.<sup>844</sup> Although the Ombudswoman proposed that students who are granted international protection should be included in the category of students who exercise the direct right to subsidised housing, such a proposal was not accepted. However, the Ordinance prescribes that an additional 750 points will be given to students under international protection, due to their specific situation.<sup>845</sup>

In October 2023, the Ordinance on the conditions and method of exercising the right to a State scholarship based on socio-economic status entered into force.<sup>846</sup>

To be included into the education system, beneficiaries must have a certificate of their status in Croatia, a certificate of residence, an identity document (e.g., birth certificate, identity card, passport or relevant document of the Ministry of Interior) and a document proving previous education. If it is not possible to enclose a document on previous education, it is necessary to give a statement before a notary public, which is then presented to the school's professional service to organise an enrolment test in order to determine the class that the candidate can attend.

<sup>840</sup> Information provided by Centre for Peace Studies, 27 February 2025.

<sup>841</sup> Ombudswoman for Children: *Report on the work of the Ombudswoman for Children in 2024*, available in Croatian: <https://dijete.hr/hr/izvjesca/izvjesca-o-radu-pravobranitelja-za-djecu/#>.

<sup>842</sup> Information provided by UNICEF Office for Croatia, 4 February 2025.

<sup>843</sup> Law on Recognition and Evaluation of Foreign Educational Qualifications, Official Gazette 69/2022, available in Croatian at: <https://bit.ly/3OPwl79>.

<sup>844</sup> Ordinance on conditions and methods of exercising the right of students in regular status to subsidized housing, Official Gazette 68/2023, 77/2024.

<sup>845</sup> Ombudswoman, Report of the Ombudswoman 2023, available in Croatian at: <https://bit.ly/4crt2kR>.

<sup>846</sup> Ordinance on the conditions and method of exercising the right to a state scholarship based on socio-economic status, Official Gazette 114/2023, available in Croatian at: <https://bit.ly/3xIkixM>.

As a part of the project "*Support in the integration of children and families under international protection*", which was implemented with the financial support of the Ministry of Labor, Pension System, Family and Social Policy, in 2024 the Society for Psychological Assistance (SPA) with the purpose of empowering and educating professional school staff and teachers who work with children, held 2 lectures on the specifics of working with children that are beneficiaries of international and temporary protection and other children who are at risk of social exclusion. They were provided with knowledge and tools to better understand the needs of students, but also to preserve their own mental health. A total of 49 school employees participated in the lectures. In addition, SPA developed the group program "*How to make learning not torture*". The 3 workshops of 45 minutes each were conducted in three partner schools for children in the 5th and 6th grades. Workshops included children under international or temporary protection and gathered 15 children from each school. The program focused on help in learning, so topics related to learning methods, techniques and the organization of learning and time were covered. In addition, individual learning support was provided for 12 students, who were visited by volunteers from helping professions once a week for 90 minutes throughout the school year.<sup>847</sup>

In the field of education, in the course of 2024, AYS assisted in the realization of the rights of persons under international protection by supporting enrolment in kindergartens, primary and secondary schools, higher education, and adult education.<sup>848</sup>

AYS also reported that in the course of 2024, they continued to provide educational support to children granted international protection, i.e., 44 volunteers provided 1,379 hours of educational support to 41 children from 24 families. The support programme included support in language learning, mastering school materials, building independence in academic context, expanding the social network, cooperation with schools and mediation in communication between parents and the school. Volunteers had the obligation to spend a minimum of 2 hours a week working with children.

However, as further reported by AYS, obstacles in the access to education have continued. Children who turn 15 and have not completed primary education are referred to adult primary education programs, which are not adequate for the developmental needs of adolescents integrating into a new community. These programs also do not include preparatory classes for learning the Croatian language. AYS is aware of at least one case in which it took over a year to include a child in a vocational training program. When a primary school certificate is missing and the child is enrolled in adult education or vocational training programs, the legally prescribed should be applied. However, in practice, these procedures are often not implemented, making access to education even more difficult. In the absence of a certificate, the institution providing adult primary education is required to carry out an assessment process, but AYS has repeatedly encountered situations where it was claimed that such assessment is not possible. As a result, it is highly likely that a child applicant aged 15 and over will remain outside the education system for extended periods. Although legislation allows for the inclusion of students over the age of 17 or 18 in the regular secondary school system, in practice they are often referred to adult secondary education programs, which — in addition to the previously mentioned shortcomings — also involve tuition fees (ranging from €900 to €2,500 per year). This leads to situations where children who were, by age, entitled to regular secondary education, miss that opportunity due to delays by institutions, and by the time they are considered, they have exceeded the age limit for regular secondary school enrollment.

In addition, AYS reported that the problems related to inclusion of children to preparatory classes continued in 2024. For students who have insufficient knowledge of the Croatian language, the school is obliged to organise preparatory classes. According to AYS, in practice, organisation of preparatory classes is extremely lengthy and children often wait for months before preparatory classes are approved. Also, some children have to go to another school for preparatory classes, and as a result, they cannot attend part of classes at their own school. If a child after 70 hours of preparatory classes does not meet the minimum requirements for inclusion in the regular education system, they should once again attend the program of

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<sup>847</sup> Information provided by Society for Psychological Assistance, 13 January 2025.

<sup>848</sup> Information provided by AYS, 15 January 2025.

preparatory classes. At the same time, in most cases, 140 hours of learning Croatian language is not enough for a child to be able to use the language independently to successfully achieve academic goals. Also, children who have been granted international protection in Croatia and who have been deported back to Croatia with their families are not able to enroll in school until they receive a valid residence permit with a new address. This process often takes more than a month.

CPS also reported that in practice, obstacles in the access of beneficiaries granted international protection to higher education continued in 2024.<sup>849</sup> Although, they have the right to higher education equally as Croatian citizens, there is no specific category for enrolling persons granted international protection to faculties, so they are enrolled either as other foreigners, which means they have to pay high tuition fees, or as Croatian citizens - which means that they have to take state graduation exam and have Croatian citizenship. In addition, as refugee students are enrolled in colleges in the quota for foreigners - they do not have access to all the majors, because not all faculties provide all majors for foreigners as well. There is also the problem of non-recognition of foreign educational qualifications in cases where beneficiaries have documents to prove their previous education as well as very high prices for beneficiaries of international protection who have to take different subjects which are not provided free of charge to them. In addition, problems arise in the exercise of most of the rights enjoyed by full-time students.

During 2024, at the local level in the City of Zagreb, 9 children that were granted international protection and 92 children under temporary protection attended kindergartens. 35 children applicants for international protection, 46 children beneficiaries of international protection and 274 children beneficiaries of temporary protection attended primary schools in the City of Zagreb. High schools in the City of Zagreb were attended by 5 students seeking international protection, 21 students under international protection and 115 students under temporary protection. The implementation of the project "*ALTERNATIVE TEACHING - INTERCULTURAL SCHOOL CLASS*" continued in Zagreb primary and secondary schools. This project, which contributes to the reduction of prejudices by creating prerequisites for building a fair and inclusive society, was implemented during 2024 in 49 Zagreb schools (29 elementary and 17 secondary schools), and included 1,300 students.<sup>850</sup>

The UNICEF Office in Croatia reported that, in cooperation with its implementing partner, the Faculty of Humanities and Social Sciences at the University of Zagreb, it is developing an online professional development programme for educational staff in kindergartens, primary and secondary schools through self-paced learning as part of the PREMISE programme for Inclusive, Supportive and Equitable Education for Migrants. The programme will be adopted by the Education and Teacher Training Agency, while the Croatian Academic and Research Network (CARNET) will ensure its long-term free online availability for educators, teachers and professional associates in the education system. As a foundation for the development of the training programme, a needs assessment is being conducted to examine the educational challenges faced by students of migrant origin and their families in early and preschool education, primary education (both class and subject teaching levels), and secondary education, as well as the needs of educational professionals in creating a supportive, inclusive, and equitable environment for children of migrant origin. Based on the assessment and the existing legal framework, evidence-based guidelines and recommendations will be developed to improve the quality of education and the integration of children and families of migrant origin into Croatian society. The assessment results and recommendations will be available in 2025.<sup>851</sup>

In January 2024, the Ministry of Science, Education and Youth adopted a Decision on the financing of the implementation of basic adult education and training for simpler jobs in various occupations for the year 2024.<sup>852</sup> According to this Decision, the right to access the program of basic education and training for simpler jobs in occupations—delivered in regular, correspondence-consultative, and consultative-

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<sup>849</sup> Information provided by Centre for Peace Studies, 27 February 2025.

<sup>850</sup> Information provided by the City of Zagreb, 28 January 2025.

<sup>851</sup> Information provided by UNICEF Office for Croatia, 4 February 2025.

<sup>852</sup> Ministry of Science, Education and Youth: Decision on the financing of the implementation of basic adult education and training for simpler jobs in various occupations for the year 2024, 30 January 2024, available at: <https://mzm.gov.hr/vijesti/odluka-o-financiranju-provedbe-osnovnog-obrazovanja-odraslih-i-osposobljavanja-za-jednostavnije-poslove-u-zanimanjima-u-2024-godini/5977>.

instructive formats—is also granted to asylees, foreigners under subsidiary protection, and foreigners under temporary protection.

## F. Social welfare

Asylees and foreigners under subsidiary protection have the right to social welfare pursuant to the regulations governing the domain of social welfare of Croatian citizens.<sup>853</sup> In February 2022, a new Law on Social Welfare entered into force.<sup>854</sup>

The Law on Social Welfare provides that asylees, foreigners under subsidiary protection, and foreigners under temporary protection as well as members of their family who legally reside in Croatia, can receive benefits and services in the social welfare system under the conditions prescribed by this Law, and the Law on international and temporary protection.

Social welfare activities are performed by social welfare institutions, local and regional self-government units, associations, religious communities, other legal persons, craftsmen and other physical persons performing social welfare activities.

Some basic information is also provided in materials (i.e., videos and a brochure) prepared by the Croatian Law Centre.<sup>855</sup>

The realisation of social rights in Croatia also depends on the place of residence.

The social rights to which beneficiaries of international protection are entitled in the welfare system include care and assistance allowance; one-time allowances; up-to-employment allowance, education-related allowances; allowance for vulnerable energy buyers; housing allowance – right granted at the level of local self-government units; fuel allowance – right granted at the level of regional self-government units; personal needs allowance for a residential care beneficiary; personal disability allowance; status of a parent caretaker or status of a caretaker; guaranteed minimum benefit. It also includes social welfare services (initial social welfare service; counselling and assistance; attendance; psychosocial support; early intervention; assistance with inclusion into programmes of upbringing and regular education – integration; day care; accommodation and organised housing).<sup>856</sup>

Following the Amendments to the Decision of Social Welfare in 2019,<sup>857</sup> the social rights provided by the City of Zagreb were extend to families of asylees and foreigners under subsidiary protection.<sup>858</sup>

In 2021, a manual entitled "The role of social welfare in the integration of persons with international protection" was prepared within a project implemented by the Croatian Association of Social Workers in partnership with the Centre for Social Welfare Split and with the support of the Ministry of Labour, Pensions, Family and Social Policy, as well as the Ministry of Interior.<sup>859</sup> The manual is intended for social workers and other experts and associates of social welfare centres across the Centres for Social Welfare and their branches in Croatia.<sup>860</sup>

According to the Ministry of Labour, Pension, Family and Social Policy, a total of 83 beneficiaries of international protection benefited from the social welfare system in 2024, in accordance with the Law on

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<sup>853</sup> Article 73 LITP.

<sup>854</sup> Official Gazette 18/2022, 46/2022, 119/2022, 71/2023, 156/2023, 61/2025.

<sup>855</sup> Croatian Law Centre, video „You have a right to social welfare rights: <https://bit.ly/3dPKWCc>; <https://bit.ly/3aCwtaY>; <https://bit.ly/32OY9VG>; and brochure available at: <https://bit.ly/2RZdkJz>.

<sup>856</sup> Office for Human Rights and Rights of National Minorities of the Government of the Republic of Croatia: *INCLuDE Social Inclusion of Persons Granted International Protection in the Republic of Croatia*, year of publication: 2022, available in English at: <https://bit.ly/3E23GKi>; and in Croatian at: <https://bit.ly/3O3c4xz>.

<sup>857</sup> Amendments available in Croatian at: <https://bit.ly/2UQoMXa>.

<sup>858</sup> City of Zagreb, *Social welfare decision*, 4 April 2019, available at: <https://bit.ly/2URy7hj>.

<sup>859</sup> The manual is available at: <https://bit.ly/3pNh13c>.

<sup>860</sup> Croatian Association of Social Workers, *Manual "The role of social welfare in the integration of persons with international protection*, 2021, available at: <http://husr.hr/web/?p=4983>.

Social Welfare. The benefits accessed included the guaranteed minimum allowance, assistance and care allowance, compensation for vulnerable energy consumers, inclusion allowance, one-time financial assistance, and personal disability benefit. Furthermore, in 2024, 44 housing entitlement decisions were issued to refugees, in accordance with Article 67 of the LITP, and as of 31 December, 39 individuals continued to receive these entitlements.<sup>861</sup>

## G. Health care

According to the LITP, asylees and foreigners under subsidiary protection shall exercise the right to health care pursuant to the regulations governing health insurance and health care of foreigners in the Republic of Croatia.<sup>862</sup> The costs of health care shall be paid from the State Budget under the item of the Ministry competent for health care.

The Law on Compulsory Health Insurance and Health Care for Foreigners in the Republic of Croatia prescribes that asylees, foreigners under subsidiary protection, foreigners under temporary protection and their family members have the right to health care<sup>863</sup> to the same extent as health insured persons under mandatory health insurance.<sup>864</sup>

According to the Law on Compulsory Health Insurance and Health Care for Foreigners in the Republic of Croatia, the right to health care is provided on the basis of a valid document issued by the Ministry of Interior.<sup>865</sup> The competent police administration or police station is obliged to notify the ministry competent for health that asylum, subsidiary protection or temporary protection was granted to foreigner, at the latest within eight days from the date of execution of the decision granting protection.<sup>866</sup>

This means that there is a difference between the unemployed and employed beneficiaries of international protection. Unemployed beneficiaries of international protection are not insured within the Croatian Health Insurance Fund, but the costs of their health care are covered from the State budget from the position of the ministry responsible for health. In the case of unemployed beneficiaries, health care providers should send invoices, a copy of the residence permit and accompanying medical documentation directly to the Ministry of Health. This category of beneficiaries does not have a health insurance card but prove their status with a residence permit card. Also, they do not have an identity number of the insured person nor are they in the Central Health Information System. When a beneficiary of international protection gets a job and starts paying health insurance contributions, s/he becomes insured. However, unlike Croatian citizens, their family members cannot acquire the right to compulsory health insurance through their insured relative, but costs continue to be covered by the State budget through the Ministry of Health. If a beneficiary of international protection loses employment, he/she ceases to be insured by Croatian Health Insurance Fund.<sup>867</sup> However in practice, healthcare professionals are not sufficiently familiar with the rights of beneficiaries of international protection and the way in which they can exercise their right to health care.

Problems in the health system were reported by NGOs.

For example, AYS reported that although the Law on Compulsory Health Insurance and Health Care for Foreigners provides for the right to access healthcare to the same extent as insured persons, individuals granted international protection cannot obtain the status of an insured person with the Croatian Health Insurance Fund (HZZO), thereby excluding them from the possibility of obtaining supplementary health insurance.<sup>868</sup> In practice, access to primary, secondary, and tertiary healthcare is often limited or difficult.

<sup>861</sup> Croatian Law Centre: The Croatian Asylum System in 2024- National Report; available at: [https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024\\_CLC.pdf](https://www.hpc.hr/wp-content/uploads/2025/05/National-Asylum-Report-2024_CLC.pdf).

<sup>862</sup> Article 69(1)-(2) LITP.

<sup>863</sup> Article 17 Law on Compulsory Health Insurance and Health Care for Foreigners in the Republic of Croatia.

<sup>864</sup> Article 21(1) Law on Compulsory Health Insurance and Health Care for Foreigners in the Republic of Croatia.

<sup>865</sup> Article 21(2) Law on Compulsory Health Insurance and Health Care for Foreigners in the Republic of Croatia.

<sup>866</sup> Article 21(3) Law on Compulsory Health Insurance and Health Care for Foreigners in the Republic of Croatia.

<sup>867</sup> Croatian Association of Social Workers: *Handbook- The role of social welfare in the process of integration of persons with international protection*, available at: <https://bit.ly/3uti9M5>.

<sup>868</sup> Information provided by AYS, 15 January 2025.



Furthermore, the administration and monitoring of unemployed individuals and children under international protection within the Central Information System of Primary Healthcare in Croatia is extremely limited. Persons who are not insured with the Croatian Health Insurance Fund (HZZO) and therefore do not have a personal insurance identification number (*matični broj osiguranika*, MBO) cannot have a digital medical record, are not eligible for ePrescription or eAppointment services, and do not have an assigned general practitioner. Instead, they must be registered in the system with each visit. In order to claim reimbursement for the treatment of these patients, healthcare providers and pharmacies are required to submit invoices to the Ministry of Health (through the Croatian Health Insurance Fund) each month. Based on AYS' experience, medical professionals are generally unfamiliar with the administrative procedures concerning beneficiaries of international protection, or they complain about excessive delays in cost reimbursement, which sometimes results in a refusal to provide the necessary healthcare services.

In 2020, the Ministry of Health provided instructions to relevant health care institutions and pharmacies on the way that medicines should be provided to asylees and persons under subsidiary protection.<sup>869</sup> According to these instructions, the pharmacy delivers an invoice addressed to the Ministry of Health and to the Croatian Health Insurance Fund. A prescription form and a copy of a document issued by the Ministry of the Interior which shows the status of the foreigner to whom the invoice was issued, should be attached to the invoice. The Croatian Health Insurance Fund subsequently submits an invoice for payment to the Ministry of Health after having reviewed the conformity of the medicines prescribed. If it is a medicine that is on the basic list of medicines of the Croatian Health Insurance Fund, the price of the medicine is borne entirely by the Ministry of Health, while in the case of a medicine from the supplementary list, the price is partly borne by the person and partly by the Ministry of Health. If a person is issued a private prescription, the person bears the full cost of the medicine.

The Ombudswoman's report for 2024 emphasised that although the LITP states that persons under international protection have the right to health care in accordance with the Law on Compulsory Health Insurance and Health Care for Foreigners, there are difficulties in the implementation of these laws as reported above. Furthermore, the Ombudswoman notes that, as a consequence, general practitioners often refuse to accept them, and it is particularly concerning that pediatricians are refusing to accept children. Additionally, under the Law on Voluntary Health Insurance, only persons who have established their status as insured persons in the mandatory health insurance system may have voluntary health insurance. As a result, costs of co-payments and additional services (dental care, orthopedic aids, medicines from the B list, etc.) must be covered by the individuals themselves, without the possibility of contracting supplementary insurance. Only upon employment do they become mandatory insured persons of the Croatian Health Insurance Fund, at which point they are entered into the system and receive a corresponding unique identification number. However, children beneficiaries of international protection are not able to obtain this right at all, which is particularly concerning given the lower financial capacity of unemployed persons or families under international protection, who cannot afford more complex forms of treatment that would otherwise be covered by supplementary health insurance. Moreover, persons who are not insured by the Croatian Health Insurance Fund and do not have their own unique identification number cannot have a digital medical record, cannot use services such as ePrescription and eReferral, and do not have a chosen physician. Instead, they must be newly registered in the system during each visit, and in order to reimburse the costs of treating such patients, doctors/pharmacies are required to send invoices to the Ministry of Health every month—a process many doctors are not even aware of. Regarding the recommendation to the Ministry of Health to adopt a regulation that would govern access to healthcare services and clearly define how services for persons under international protection are to be provided and reimbursed, it is positive that a working group has been appointed to draft the regulation. The working group includes representatives of the Ministry of Health, Ministry of the Interior, Ministry of Labour, Pension System, Family and Social Policy, and Croatian Health Insurance Fund. However, as highlighted by the Ombudswoman, it is discouraging that the group was established back in 2022 and that the regulation has still not been adopted, while the issues remain unresolved.<sup>870</sup>

<sup>869</sup> Ministry of Health: Letter from the Ministry of Health to Croatian Health Insurance Fund, 15 July 2020, available at: <https://bit.ly/3tD9kh1>.

<sup>870</sup> Ombudswoman, Report of the Ombudswoman for 2024, available in Croatian at: <https://www.ombudsman.hr/wp-content/uploads/2025/05/lzvjesce-pucke-pravobraniteljice-za-2024.-godinu-2.pdf>.



In the course of 2024, AYS provided information on the scope of the right to health care to beneficiaries of international protection, but also assisted them with enrolment procedures or when persons undertook medical examinations. AYS highlighted that the non-recognition of the right to health care for beneficiaries of international protection remains a shortcoming.<sup>871</sup>

Centre for Peace Studies (CPS) published a Guide for citizens of third countries on access to healthcare in Croatia.<sup>872</sup> The guide contains information about the basic terms that people face when accessing the health system and when communicating with doctors and other health service providers in Croatia. The guide also contains instructions on how to find a primary care doctor and other useful instructions for accessing healthcare in Croatia. The guide is available in Croatian,<sup>873</sup> Arabic,<sup>874</sup> English,<sup>875</sup> French,<sup>876</sup> Hindi,<sup>877</sup> Nepali,<sup>878</sup> Turkish, and Ukrainian.<sup>879</sup>

In addition to the Guide, CPS has created video materials on the e-Citizens Portal,<sup>880</sup> and Finding General Practitioners and Gynaecologists for foreigners in the Republic of Croatia.<sup>881</sup>

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<sup>871</sup> Information provided by Are you Syrious, 15 January 2025.

<sup>872</sup> Centre for Peace Studies: Guide for citizens of third countries on access to healthcare in Croatia, available at: <https://bit.ly/4cqVq6G>.

<sup>873</sup> <https://www.cms.hr/publikacija/vodic-za-drzavljan-e-trecih-zemalja-pristup-zdravstvu-u-hrvatskoj-hrv/>.

<sup>874</sup> <https://www.cms.hr/publikacija/arab/>.

<sup>875</sup> <https://www.cms.hr/publikacija/guide-for-third-country-nationals-access-to-health-care-in-croatia-eng/>.

<sup>876</sup> <https://www.cms.hr/publikacija/guide-pour-les-ressortissants-de-pays-tiers-acces-aux-soins-de-sante-en-croatie-fra/>.

<sup>877</sup> <https://www.cms.hr/publikacija/hindu/>.

<sup>878</sup> <https://www.cms.hr/publikacija/nepali/>.

<sup>879</sup> <https://www.cms.hr/publikacija/ukr/>.

<sup>880</sup> e-Citizens is a central point for all public sector information and services in Croatia.

<sup>881</sup> Video materials available at: <https://bit.ly/3xsDABh>.

## ANNEX I – Transposition of the CEAS in national legislation

All legal standards of the CEAS have been transposed in Croatian legislation.

### Directives and other measures transposed into national legislation

Directive	Deadline for transposition	Date of transposition	Official title of corresponding act	Web Link
<b>Directive 2011/95/EU</b> Recast Qualification Directive	21 December 2013	22 November 2013	Amendment to the Law on Asylum Official Gazette 79/07, 88/10, 143/13  Law on International and Temporary Protection Official Gazette 70/15, 127/2017, 33/2023	<a href="http://bit.ly/1MRraQ5">http://bit.ly/1MRraQ5</a> (HR) <a href="http://bit.ly/1J7yrxu">http://bit.ly/1J7yrxu</a> (HR) <a href="http://bit.ly/1logkxD">http://bit.ly/1logkxD</a> (HR)  <a href="http://bit.ly/1hlaq3Q">http://bit.ly/1hlaq3Q</a> (HR) <a href="https://bit.ly/2pPntru">https://bit.ly/2pPntru</a> (HR) <a href="https://bit.ly/43iu0Mc">https://bit.ly/43iu0Mc</a> (HR)
<b>Directive 2013/32/EU</b> Recast Asylum Procedures Directive	20 July 2015 Article 31(3)-(5) to be transposed by 20 July 2018	2 July 2015	Law on International and Temporary Protection Official Gazette 70/15, 127/2017, 33/2023	<a href="http://bit.ly/1hlaq3Q">http://bit.ly/1hlaq3Q</a> (HR) <a href="https://bit.ly/2pPntru">https://bit.ly/2pPntru</a> (HR) <a href="https://bit.ly/43iu0Mc">https://bit.ly/43iu0Mc</a> (HR)
<b>Directive 2013/33/EU</b> Recast Reception Conditions Directive	20 July 2015	2 July 2015	Law on International and Temporary Protection Official Gazette 70/15, 127/2017, 33/2023	<a href="http://bit.ly/1hlaq3Q">http://bit.ly/1hlaq3Q</a> (HR) <a href="https://bit.ly/2pPntru">https://bit.ly/2pPntru</a> (HR) <a href="https://bit.ly/43iu0Mc">https://bit.ly/43iu0Mc</a> (HR)
<b>Regulation (EU) No 604/2013</b> Dublin III Regulation	Directly applicable 20 July 2013	2 July 2015	Law on International and Temporary Protection Official Gazette 70/15, 127/2017, 33/2023	<a href="http://bit.ly/1hlaq3Q">http://bit.ly/1hlaq3Q</a> (HR) <a href="https://bit.ly/2pPntru">https://bit.ly/2pPntru</a> (HR) <a href="https://bit.ly/43iu0Mc">https://bit.ly/43iu0Mc</a> (HR)