

**Regional Sport Initiative – Playing Together**  
*Podgorica, Montenegro*

**PROTOCOL ON RESPONSE, PREVENTION AND PROTECTION FROM  
VIOLENCE**

2022

## **I. INTRODUCTION AND PURPOSE OF THE PROTOCOL**

Regional Sport Initiative – Playing Together (hereinafter: REGSPO) is the first Montenegrin NGO that utilizes sports and sports-pedagogical methods to promote social cohesion, inclusion, and positive youth development. Active since 2017 and formally registered in 2021, we partner with primary schools, local CSOs, the Ministry of Education, the Ministry of Sport & Youth, the Institute of Education and the University of Montenegro to design and deliver school-based sports-pedagogical sessions, teacher trainings, and educational resources. Our work blends practical sport activities with non-formal education to address discrimination and strengthen life skills: we have piloted sessions in 14 schools across 7 municipalities, reaching roughly 5000 children and youth, co-created two educational kits (on gender equality and ethnic discrimination), and delivered multi-municipality teacher trainings that feed into pre-service teacher education. Through capacity building, advocacy, and long-term partnerships, REGSPO seeks to institutionalise inclusive practice in schools and scale sport-based approaches that promote equity, dialogue, and European values.

The protocol is binding for all employees, members, associates, experts, and volunteers of REGSPO who come into contact with victims of violence or become aware of cases of violence or any kind of discrimination.

This Protocol establishes the REGSPO's procedures for responding to cases of violence, in accordance with:

- Law on Sport (Official Gazette of Montenegro, No. 123/21)
- Law on Youth (Official Gazette of Montenegro, No. 027/19)
- Law on Protection from Domestic Violence of Montenegro (Official Gazette of Montenegro, No. 46/2010, 40/2011)
- Criminal Code of Montenegro (Official Gazette of Montenegro, No. 3/2020)
- Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence — Istanbul Convention (ratified 2013, in force as of 1 August 2014)
- Law on Prohibition of Discrimination of Montenegro (Official Gazette of Montenegro, No. 46/2010, 40/2011 — other law, 18/2014 and 42/2017)
- CEDAW Convention and the UN Declaration on the Elimination of Violence against Women

The objectives of this Protocol are:

1. To ensure a safe, confidential and non-discriminatory environment for all persons who approach the REGSPO in connection with violence.
1. To define clear steps for the REGSPO's staff and volunteers when handling cases of violence.
1. To establish effective cooperation with competent institutions (police, prosecution, social welfare centers, healthcare facilities).
2. To protect victims from secondary victimization and discrimination.
3. To contribute to the prevention of violence through education and awareness-raising.

## **II. DEFINITIONS AND KEY CONCEPTS**

### **2.1 Forms of Violence**

For the purposes of this Protocol, violence shall mean any act or omission that causes or may cause physical, psychological, sexual or economic harm to a person. The REGSPO recognizes the following forms of violence:

Type of Violence	Description / Examples
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<b>Physical Violence</b>	Hitting, pushing, slapping, inflicting bodily injury, obstructing medical assistance (Art. 8/1 LPDV; Art. 220 CC)
<b>Psychological / Emotional Violence</b>	Threats, verbal insults, humiliation, blackmail, isolation, control of movement and communication, threats of ‘outing’
<b>Sexual Violence</b>	Sexual harassment, rape within a partnership, coercion into sexual acts (Arts. 204–210 CC)
<b>Economic Violence</b>	Withholding means of subsistence, financial control, preventing employment, coercion into signing documents
<b>Hate Crime</b>	A criminal offence committed against a person on account of sexual orientation, gender identity or another personal characteristic (Art. 443 CC)
<b>Domestic / Intimate Partner Violence</b>	Any form of violence between family or household members (Arts. 2 and 3 LPDV)
<b>Digital / Online Violence</b>	Harassment via social media, non-consensual sharing of intimate content, cyber-bullying, doxxing

## 2.2 Who Is Considered a Victim

A victim is any natural person who is exposed to violence or faces a serious risk of violence. The REGSPO pays particular attention to kids, youth, athletes and sport professionals exposed to violence.

## 2.3 Who Is Considered a Perpetrator of Violence

A perpetrator of violence may be any natural person, peer(s), sport professional, a spouse, partner, former partner, parent, relative, colleague or an unknown individual. Violence is unacceptable without exception.

### III. PRINCIPLES OF ACTION

All actions taken by the REGSPO in cases of violence are based on the following principles:

Principle	Content
<b>Victim Safety</b>	The safety and well-being of the victim(s) are an absolute priority. A risk assessment is conducted immediately upon becoming aware of violence.
<b>Confidentiality</b>	All information about the victim is kept in strict confidence. Data is not shared without the victim's consent, except where required by law for their protection.
<b>Autonomy and Consent</b>	The victim's right to self-determination is respected. The REGSPO informs about available options but does not pressure the victim into any decision.
<b>Non-Discrimination</b>	Equal and dignified support is provided to all victims, without discrimination.
<b>Gender Mainstreaming Approach</b>	Violence is viewed in the context of power dynamics and the specific risks to vulnerable groups.
<b>Urgency</b>	Cases of immediate danger are treated urgently and without delay.
<b>Perpetrator Accountability</b>	Responsibility for violence lies solely with the perpetrator. The victim is never at fault.
<b>Non-Victimization</b>	The REGSPO actively prevents secondary victimization — questioning, blaming or humiliating the victim.
<b>Multidisciplinary Approach</b>	The REGSPO cooperates with all relevant institutions to ensure comprehensive victim protection.
<b>Documentation</b>	All steps taken are duly documented for case monitoring and victim protection.

### IV. RESPONSE TO CASES OF VIOLENCE

#### 4.1 How a Victim May Contact the REGSPO

A victim may approach the REGSPO in the following ways:

- In person, by visiting the REGSPO's premises
- **By telephone:**
- By e-mail: [regspo.me@gmail.com](mailto:regspo.me@gmail.com)
- Via secure communication channels (**Viber, WhatsApp**) - contact
- Through a third party (a trusted person, friend or relative)

#### 4.2 Overview of the Response Procedure

<b>STEP 1</b>	<b>RECEPTION AND FIRST CONTACT WITH THE VICTIM</b>
<b>STEP 2</b>	<b>SAFETY AND RISK ASSESSMENT</b>
<b>STEP 3</b>	<b>PROVISION OF IMMEDIATE SUPPORT</b>
<b>STEP 4</b>	<b>DEVELOPMENT OF A SAFETY PLAN</b>
<b>STEP 5</b>	<b>COOPERATION WITH INSTITUTIONS</b>
<b>STEP 6</b>	<b>FOLLOW-UP AND ONGOING SUPPORT</b>

### **STEP 1 – Reception and First Contact with the Victim**

Upon learning of a case of violence, the authorized staff member shall, without delay:

2. Receive the victim with empathy, without judging, questioning or challenging their experience.
3. Ensure privacy — conduct the conversation in a separate room, in the absence of any unauthorized persons.
4. Begin the conversation with open-ended questions (‘Can you tell me what happened?’) — without suggesting answers.
5. Use gender-sensitive language and always respect the victim’s gender identity and pronouns.
6. Inform the victim of their rights, including the right to a trusted person (Art. 16 LPDV).
7. Prepare an internal note of the first contact (date, mode of contact, brief description of the situation).
8. In the event of immediate physical danger — IMMEDIATELY call emergency services (124) and/or the police (122).

### **STEP 2 – Safety and Risk Assessment**

Immediately following the first contact, a safety assessment is carried out, taking into account general risk factors:

#### **General High-Risk Factors**

- Threats of homicide or serious physical violence
- Presence of weapons with the perpetrator
- Violence against children in the environment
- Perpetrator’s dependence on alcohol/drugs
- Previous violations of protective measures
- Victim has nowhere to go / no support

On the basis of the risk assessment, the level of urgency and further course of action are determined. The assessment is documented and regularly updated.

### **STEP 3 – Provision of Immediate Support**

Depending on the situation and the victim’s needs, the REGSPO provides or coordinates:

- Emotional support and psychological first aid - listening, normalizing the experience, reducing panic

- Information on rights and available protection options (without pressure regarding any specific decision)
- Free legal aid or referral to legal support (Art. 13 LPDV)
- Assistance in moving to a safe location - shelter, alternative accommodation, safe house
- Accompaniment of the victim (with their consent) to the police, hospital, court or other institution
- Referral to the SOS line (116) and on-call services
- Calling emergency services (124) or the police (122) in cases of immediate danger
- Assistance in obtaining personal documents, medication and essential items

#### **STEP 4 – Development of a Safety Plan**

In agreement with the victim and with their active participation, an individual Safety Plan is developed, containing:

2. Emergency contact numbers (police 122, emergency services 124, SOS line 116, REGSPO contact)
3. Safe locations where the victim can go (shelter, trusted person, alternative accommodation)
4. Warning signs that precede an escalation of violence
5. Plan for children, where children are present in a situation of violence
6. Important documents and items to be kept readily accessible (ID card, passport, medication)
7. Legal steps the victim is considering (filing a report, protective measures)
8. Direction of further psychosocial support (therapy, support groups, counselling)

The Safety Plan is adapted as necessary. It is kept confidential and accessible only to authorized persons.

#### **STEP 5 – Cooperation with Competent Institutions**

The REGSPO actively cooperates with competent institutions, always informing and — as a rule — obtaining the consent of the victim. An exception applies solely where there is an immediate threat to life or where required by law (Art. 9 LPDV — mandatory reporting obligation).

#### **Police**

The REGSPO refers the victim to the police and assists in filing a report. It may accompany the victim when collecting personal belongings (Art. 14 LPDV), request an order for the removal of the perpetrator (Art. 28 LPDV — up to 3 days), submit a request for protective measures (Art. 27 LPDV) and monitor the implementation of imposed measures.

#### **Protective Measures (Arts. 20–25 LPDV)**

- Removal from the home - minimum 30 days, maximum 6 months
- Prohibition of approach - minimum 30 days, maximum 1 year
- Prohibition of harassment and stalking - minimum 30 days, maximum 1 year
- Mandatory treatment for addiction - maximum 1 year
- Mandatory psychosocial treatment - maximum 6 months

Measures may be extended to a maximum of 2 years. Violation of measures: fine of min. EUR 800 or imprisonment of min. 40 days (Art. 38 LPDV).

#### **Social Welfare Centre**

The REGSPO notifies the social welfare center in cases where the victim is a child, elderly person or person with special needs, and where a support plan is required (Art. 11 LPDV). Cooperation covers the development of support plans, placement in a shelter, child protection and coordination of the multidisciplinary team.

#### **Prosecution and Courts**

The REGSPO may submit a request to initiate misdemeanor proceedings or notify the State Prosecutor (Art. 27 LPDV). It monitors court proceedings and provides accompaniment to hearings.

#### **Healthcare Facilities**

The REGSPO refers the victim to a medical examination for the purpose of documenting injuries and provides accompaniment as required. In urgent cases, emergency services are called (124).

#### **Shelter / Safe House**

The REGSPO cooperates with available shelters in Montenegro for emergency accommodation. The location of the shelter is never disclosed to the perpetrator, their family or any unauthorized persons.

### **STEP 6 – Follow-Up and Ongoing Support**

Following the immediate intervention, the REGSPO:

- Establishes regular contact with the victim at agreed intervals (at least once a month for a period of one year from the time the violence was reported)
- Updates the Safety Plan in accordance with changes in the situation
- Monitors the implementation of protective measures and judicial decisions
- Provides ongoing psychosocial support or referral to specialist therapy
- Participates in multidisciplinary teams and case conferences
- Closes a case file only with the victim's consent and upon the conclusion of the need for support

## V. SPECIAL SITUATIONS AND SPECIFIC PROCEDURES

### 5.1 Hate Crimes

Where there are indications that violence was committed out of hatred on account of sexual orientation or gender identity, the REGSPO:

- Carefully documents all relevant information and evidence
- Notifies the police with an explicit request to investigate as a potential hate crime (Art. 443 CC)
- Provides legal support to the victim in criminal proceedings
- Informs the public (with the victim's consent and with privacy protection) for the purpose of raising awareness

## VI. DUTY TO REPORT AND CONFIDENTIALITY

### 6.1 Statutory Duty to Report

In accordance with Art. 9 of the Law on Protection from Domestic Violence, all employees and volunteers of the REGSPO who become aware of committed violence in the course of their work ARE REQUIRED to report it to the police without delay. Failure to comply with this obligation entails misdemeanor liability (fine of EUR 100–500, Art. 39 LPDV).

#### **IMPORTANT – Mandatory Reporting Obligation**

The reporting obligation is not conditional on the victim's consent where there is an immediate threat to life or health.

In all other cases, the REGSPO endeavors to inform the victim of its intention to file a report and to act with their consent.

The victim is always informed of what has been reported, to whom and why.

### 6.2 Confidentiality and Data Protection

All information relating to victims, witnesses and cases is strictly confidential and protected in accordance with the Law on Personal Data Protection and Art. 15 LPDV. The REGSPO undertakes:

- Not to share the victim's identity, case details or the location of the shelter with the perpetrator or unauthorized persons
- To keep internal case files locked and accessible only to authorized persons
- To store digital data on secure servers with encryption
- To anonymize data in statistical reporting
- To observe special protection of the identity of underage victims (Art. 15/2 LPDV)

## VII. PREVENTION OF VIOLENCE

The prevention of violence is an integral part of the REGSPO's mission. In accordance with the Istanbul Convention (Arts. 12–17) and the Strategy for Protection from Domestic Violence in Montenegro, the REGSPO implements the following:

### 7.1 Education and Awareness-Raising

- Training for employees and volunteers on handling victims of violence
- Information campaigns on victims' rights and available services
- Educational materials tailored to vulnerable experiences (brochures, online resources)

### 7.2 Community Empowerment

- Support groups for survivors of violence within the sport community
- Mentoring programs and peer support
- Cooperation with educational institutions for the prevention of violence against athletes, sport professionals and vulnerable groups

### 7.3 Advocacy and Systemic Measures

- Monitoring and reporting of cases of institutional violence and discrimination
- Advocacy for improvements to the legislative framework for the protection of athletes and sport professionals from violence
- Cooperation with UNDP, UNHCR, UNICEF and international bodies
- Annual reporting on the state of violence against athletes and sport professionals in Montenegro

## VIII. RESPONSIBILITIES WITHIN THE ORGANISATION

This Protocol is binding on all persons within the REGSPO. The distribution of responsibilities is as follows:

Function / Body	Responsibilities
<b>Executive Director</b>	Ensures implementation of the Protocol; represents the REGSPO before institutions; takes decisions in crisis situations; appoints the Protection Coordinator.
<b>Violence Protection Coordinator</b>	Maintains case records; coordinates team actions; participates in multidisciplinary teams; monitors legislative changes and updates the Protocol.
<b>All Employees and Volunteers</b>	Immediately report knowledge of violence to the Coordinator; observe confidentiality; do not act individually without informing the Coordinator; undergo regular training.
<b>General Assembly</b>	Adopts and revises the Protocol; ensures resources for implementation; reviews annual reports on the application of the Protocol.

## IX. INSTITUTIONAL NETWORK AND CONTACTS

The REGSPO cooperates with the following institutions and services:

Institution / Service	Jurisdiction	Contact
<b>Montenegro Police</b>	Receipt of violence reports, intervention, protective measures	<b>122 (emergency)</b>
<b>Emergency Medical Services</b>	Medical care for victims	<b>124</b>
<b>SOS Line for Victims of Violence</b>	Free support 24/7	<b>116</b>
<b>Social Welfare Center – Podgorica</b>	Social protection, accommodation, support plan	<b>020 482 901</b>
<b>Safe Women’s House</b>	Shelter and comprehensive support for victims	<b>020 234 252</b>
<b>SOS Podgorica</b>	Counselling and support for victims	<b>020 652 636</b>
<b>State Prosecution</b>	Criminal prosecution of perpetrators of violence	<b>020 407 500</b>
<b>Protector of Human Rights and Freedoms</b>	Protection from discrimination by institutions	<b>020 225 395</b>
<b>NGO LGBT Forum Progres</b>	Specialist support for LGBTI+ victims	<b>020 675 751</b>

## X. LEGAL AND INTERNATIONAL FRAMEWORK

### Domestic Legislation

- Constitution of Montenegro
- Law on NGOs
- Law on Sport
- Law on Protection from Domestic Violence
- Criminal Code of Montenegro
- Law on Prohibition of Discrimination
- Law on Free Legal Aid
- Law on Social and Child Welfare

### International Instruments

- Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention, 2011) — ratified by Montenegro, in force as of 1 August 2014
- UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW, 1979)
- UNESCO International Charter of Physical Education, Physical Activity and Sport
- European Convention on Human Rights (ECHR)
- European Social Charter (ETS No. 35, revised ETS No. 163)
- Council of Europe Resolution Res(76)41 on the principles for a policy of sport for all
- European Sport Charter, Council of Europe revised in 2021
- Recommendation REC (2001)6 on the prevention of racism, xenophobia and racial intolerance in sport
- Recommendation CM/Rec(2011)3 on the revised Code of Sports Ethics
- Recommendation CM/Rec(2012)10 on the protection of child and young athletes

- from dangers associated with migration
- Recommendation CM/Rec(2015)2 on the gender mainstreaming in sport
  - Council of Europe Convention on Integrated Safety, Security and Services at Sports Events (CETS No. 218)
  - Yogyakarta Principles on the Application of International Human Rights Law in Relation to Sexual Orientation and Gender Identity (2006, supplemented in 2017 — YP+10)

## XI. DOCUMENTATION AND RECORD-KEEPING

In accordance with the Law on Personal Data Protection, the REGSPO maintains orderly records of all cases and actions taken. Documentation includes:

- Internal case intake (date, method of contact, summary, initial risk assessment)
- Case file
- Institutional cooperation form
- Record of protective measures and monitoring taken
- Case closure report

## XII. REVISION, ADOPTION AND ENTRY INTO FORCE

This Protocol is adopted by the General Assembly of REGSPO and enters into force on the date of adoption. All persons referred to in Section VIII are obliged to familiarize themselves with the content of the Protocol and to sign a Declaration of Acknowledgement.

The Protocol shall be revised and updated upon changes to the legislative framework, and on the basis of practical needs.

Date of adoption  
February 2022

Approved by

Marina Tomović  
General Secretary



