

LABOUR MARKET (RE-)INTEGRATION AND SKILLS DEVELOPMENT FOR PERSONS WITH DISABILITIES – MONTENEGRO

Country note

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CONTENTS

CONTENTS	3
PREFACE	5
1 CONTEXT AND OVERVIEW OF THE SITUATION OF PERSONS WITH DISABILITIES	6
1.1 Context	6
1.2 Situation of Persons with disabilities	7
2 STRATEGIC AND INSTITUTIONAL FRAMEWORK	9
2.1 Legislative framework	9
2.2 Strategic framework	11
2.3 Institutional framework	13
2.4 Coordination and cooperation mechanisms	16
2.5 Sources of financing	17
3 POLICIES SUPPORTING EMPLOYABILITY OF PERSONS WITH DISABILITIES	19
3.1 Services supporting employability of persons with disabilities	19
3.2 Measures supporting employability of persons with disabilities	21
3.3 Services and measures addressing needs of war veterans	22
3.4 Enhancing capacity of main stakeholders	22
4 POLICIES SUPPORTING DEMAND FOR EMPLOYMENT OF PERSONS WITH DISABILITIES	24
4.1 Quota system and wage subsidies	24
4.2 Direct Financing Instruments: Grants, Loans, and Self-Employment Support	26
4.3 Accessibility, Quality, and Key Challenges	27
5 THE LINKAGES BETWEEN EMPLOYMENT AND OTHER POLICIES AREAS	30
5.1 From school to the labour market	30
5.2 Skills development opportunities	31
5.3 How social benefits support employment of persons with disabilities	32
5.4 Access to social services	33
5.5 Accessibility	35
6 THE GENDER DIMENSION OF POLICIES SUPPORTING EMPLOYMENT OF PERSONS WITH DISABILITIES	37
6.1 Differences between men and women with disabilities in the labour market	37
6.2 Access to Employment Services and Measures: A Gender Perspective	38
6.3 Key Challenges and Barriers from a Gender Perspective	38
7 CONCLUSIONS AND RECOMMENDATIONS	40
7.1 Conclusions	40
7.2 Recommendations	42
7.3 Best practices	45

ANNEX	48
List of institutions and organizations	48

ACRONYMS	49
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REFERENCES	51
Legal	51
National strategies	52
Other	52

PREFACE

The Country Note presents the situation in Montenegro related to labour market (re-)integration and skills development for persons with disabilities, with special attention paid to the role of active labour market policy and measures (ALMPs).

The European Training Foundation (ETF) initiated a mapping of policies and programmes for labour market (re-)integration and skills development for persons with disabilities in several ETF partner countries, in response to the European Union's goal to foster social inclusion and the economic autonomy of persons with disabilities through employment, as per the priorities set out in the EU Disability Employment Package.

The main objectives were to conduct a systemic, comparative policy analysis of the support for the employment of persons with disabilities and identify needs for strengthening the capacity of actors in selected EU neighbouring countries.

The analysis was conducted in accordance with the framework proposed by the EU Disability Employment Package, with a particular focus on Active Labour Market Policies and skills development dimensions.

In Montenegro, the methodology consisted of desk review and face-to-face and online interviews with primary stakeholders active in the area of promotion of employment and inclusion for persons with disabilities. The detailed list of interviewees appears in Annex.

1 CONTEXT AND OVERVIEW OF THE SITUATION OF PERSONS WITH DISABILITIES

1.1 Context

Montenegro is a small country, located on the Adriatic coast of the Balkan Peninsula. In 2023, the country had a population of some 630,000 people¹, an increase of 2% since 2011, partly due to an influx of foreign residents. The capital and largest city, Podgorica, is home to 29% of the total population. Montenegro's population is increasingly urbanised – about 69% urban in 2025 – with almost half of all residents concentrated in just three municipalities (Podgorica, Nikšić and Bar). Demographically, the population has a median age of around 40 years and is gradually aging².

Participation in Montenegro's labour market is moderate, and it has been improving in recent years. MONSTAT Labour Force Survey data for late 2024 show an activity rate for persons aged 15 to 89 of 63.9%, with 36.1% inactive. The employment rate in 2024 stood at 56.6%, reflecting gradual gains as the economy recovered from the pandemic³.

Unemployment in Montenegro has fallen sharply. As of 2024, the overall unemployment rate had declined to approximately 11.5%, a significant improvement compared to a few years earlier (it hovered around 15% in early 2023). This trend indicates that the labour market has been recovering, with job creation outpacing growth of the labour force. However, unemployment remains a challenge for certain groups. In particular, the youth unemployment rate is persistently high, with roughly 25–26% of young people (aged 15–24) unemployed in 2023/2024⁴, more than double the national average. NEET youth make up a significant part of the population in Montenegro. According to data from MONSTAT's Labour Force Survey (LFS), at the end of 2023, 20.3% of total youth population fell into the NEET category. Data on persons with disabilities within the NEET population in Montenegro is not available. Long-term joblessness and regional disparities also persist. The less developed northern region faces higher unemployment and lower job opportunities, contributing to higher poverty in this area. Overall, while labour market indicators are improving, Montenegro still contends with a sizeable inactive population and a need to boost job opportunities for youth and in poorer areas⁵.

Inequality has been on a downward trend. The Gini coefficient of disposable income was about 31.5 in 2022, down from the mid-30s in the mid-2010s. Still, inequality remains slightly above the EU average (the EU Gini was ~29.3 in 2024)⁶. Average incomes in Montenegro are modest compared to those in the EU. The country's GDP per capita is around \$13 000 USD (nominal) and about \$28 000 USD in PPP terms. Following a substantial increase, driven, in part, by tax policy changes, the average net monthly wage reached about €1 000 by year-end 2024. This boost in wages contributed to improving living standards and likely helped reduce poverty⁷.

Despite these income gains, many households still experience material hardship. In 2021, nearly 24% of Montenegrins were in severe material and social deprivation, meaning they could not afford basic necessities and amenities. This rate is high, underscoring ongoing challenges in living conditions for a significant segment of the population. On a positive note, by global standards of absolute poverty,

¹ Statistical Office of Montenegro-MONSTAT, Population of Montenegro by Sex and Age, Census 2023, [online]. Last accessed 25 July 2025 at: <https://www.monstat.org/eng/novosti.php?id=4013>.

² Ibid.

³ Statistical Office of Montenegro-MONSTAT, Labour Force Survey 2024, [online]. Last accessed 23:02.2026 at: [LFS release 2024.pdf](https://monstat.org/eng/novosti.php?id=4013).

⁴ World Bank, Youth Unemployment Rate for Montenegro [SLUEM1524ZSMNE], [online]. Last accessed 27 July 2025 at: <https://fred.stlouisfed.org/series/SLUEM1524ZSMNE>.

⁵ Ibid.

⁶ European Commission, *Living conditions in enlargement countries*, 2025, [online]. Last accessed 27 July 2025 at: <https://ec.europa.eu/eurostat/statistics-explained/SEPDF/cache/45578.pdf#:~:text=Serbia%20reported%20the%20largest%20decrease,North%20Macedonia>.

⁷ Ibid.

Montenegro fares better. Using the World Bank's moderate poverty line (US\$6.85 per day, 2017 PPP), an estimated 8.9% of Montenegrins lived below this in 2024, a share that has fallen in recent years⁸.

1.2 Situation of Persons with disabilities

According to the 2023 Census of Population⁹, **approximately 8.5% of Montenegro's population reported having at least one hindrance or limitation** in performing daily activities. These difficulties include challenges with walking (5.83% of the population), seeing (3.86%), hearing (2.48%), cognition (2.02%), self-care (2.12%), and communication (1.09%). Women report a higher prevalence of activity limitations (9.56% of women vs. 7.48% of men). **About 5.4% of Montenegrins have an officially recognised disability status** confirmed by a competent institution.

Disability is strongly correlated with age – while detailed age breakdowns from the 2023 Census are pending, it is well understood that the prevalence of disabilities rises sharply in older age groups. Smaller, rural and economically disadvantaged municipalities have higher shares of residents with disabilities (e.g., Andrijevica, at 18.1%), whereas more developed areas like Budva report lower shares (around 3.5%). This indicates that older populations and less developed regions (especially in the north of Montenegro) tend to have a higher incidence of disability, likely due to both aging, limited access to health services, and an above-average concentration of older cohorts in northern regions¹⁰.

Interviewees raised concerns about the insufficient application of international standards during the census, unclear format and incomplete categories in the question on disability, and the omission of such groups as persons with intellectual disabilities, autism and rare impairments. This could lead to an underestimation and misclassification of certain disability groups. While the census provides basic information, it lacks deeper analysis needed for effective policy planning. Data on housing accessibility and daily support needs were insufficient.

Data on the situation of persons with disabilities in Montenegro's labour market are fragmented. The Employment Agency of Montenegro (EAM) registered the rate of unemployed persons with disabilities through its Labour Force Survey (LFS). These administrative figures enable the monitoring of the number of persons with disabilities seeking work (or registered for benefits) and can be disaggregated by sex, age, municipality, etc. For instance, the EAM routinely reports the number of unemployed persons with disabilities by region and duration of unemployment, which has shed light on issues like the concentration of jobseekers with disabilities in the north of the country and the prevalence of long-term unemployment.

However, significant data gaps persist. The LFS does not provide core indicators (employment rate, labour force participation rate, unemployment rate) for persons with disabilities. This makes it difficult to compare the labour market status of persons with disabilities to the general population using standard indicators. While Montenegro's EU Survey on Income and Living Conditions (SILC)¹¹ includes the GALI question (self-reported activity limitation), published SILC reports by MONSTAT have not highlighted employment or poverty statistics disaggregated by disability status. Meanwhile, Eurostat publishes selected harmonised statistics for Montenegro, including data derived from the EU-SILC framework. Through Eurostat's database, some indicators, such as at-risk-of-poverty rates, material deprivation, and limited breakdowns by activity limitation (based on the GALI question), are

⁸ World Bank (2024), The World Bank in Montenegro, [online]. Last accessed 28 July 2025 at: <https://www.worldbank.org/en/country/montenegro/overview#:~:text=tourist%20overnight%20stays%20and%20stagnant,in%202024.>

⁹ Statistical Office of Montenegro-MONSTAT, Population of Montenegro by Sex and Age, Census 2023, [online]. Last accessed 25 July 2025 at: <https://www.monstat.org/eng/novosti.php?id=4013>.

¹⁰ European Blind Union, Montenegro, [online]. Last accessed 25 July 2025 at: https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.euroblind.org%2Fsites%2Fdefault%2Ffiles%2Fdocuments%2Fpresentation_ebu_conference_employment-montenegro-eng.docx%23%3A~%3Atext%3DAt%2520the%2520European%2520level%2520C%2520there%2520Care%2520unemployed%2520C%2520of%2520which%25206&wdOrigin=BROWSELINK.

¹¹ EU Survey on Income and Living Conditions (SILC) / MONSTAT, Survey on Income and Living Conditions, EU-SILC 2022, [online]. Last accessed 02 August 2025 at: https://www.monstat.org/uploads/files/SILC/2022/RELEASE_Survey_on_Income_and_Living_Conditions_EU-SILC_2022.pdf.

available and enable partial comparability with EU Member States. Nevertheless, these datasets remain limited in scope for Montenegro, in particular with regard to detailed labour market outcomes and comprehensive disability-disaggregated indicators. As a result, while Eurostat provides an important complementary source, it does not fully compensate for the absence of nationally published, disability-disaggregated statistics, especially in relation to employment and social inclusion.

Essentially, there is very limited statistical data disaggregated by disability, gender, age or locality in the labour domain. The United Nations Committee on the Rights of Persons with Disabilities (UNCRPD) has pointed out the lack of consistent data collection on persons with disabilities in Montenegro and urged improvements in data disaggregation¹².

Registered unemployment data provide a partial picture of labour market engagement for people with disabilities. As of 30 June, 2025, the Employment Agency of Montenegro (EAM)¹³ reported a total of **8,366 persons with disabilities registered as unemployed**, of whom **61.3% were women**. This represents a decrease of **8.3% compared to the same date in 2024**. Nevertheless, their share in the overall unemployed population remains high, at **29.93%**. The high representation of persons with disabilities among the unemployed indicates limited opportunities for their economic inclusion and the need for more targeted employment measures. Moreover, the gender dimension is significant: women with disabilities make up nearly two thirds of this group, pointing to compounded barriers that arise at the intersection of disability and gender. Only a limited number of persons with disabilities are recorded as employed through targeted programmes. MONSTAT data shows that the labour force participation rate of persons with disabilities is likely well below that of the general population (which had an activity rate around 64–65% in 2024)¹⁴.

Age is a critical factor in the employment situation of persons with disabilities. More than two-thirds of registered persons with disabilities who are also jobseekers are over the age of 50. Many of these older individuals likely acquired disabilities later in life (often through chronic illnesses or work-related health issues) and find themselves effectively pushed out of the workforce before retirement. Younger persons with disabilities are relatively few on the unemployment register. Those young persons with disabilities who do seek work often face significant challenges transitioning into employment, as evidenced by low school-to-work transition rates in regional studies¹⁵.

¹² United Nations in Montenegro, *Common Country Analysis-Montenegro, 2021*, [online]. Last accessed 01 August 2025 at: <https://montenegro.un.org/sites/default/files/2021-06/Common%20Country%20Assessment%20Montenegro%202021%20-%20ENG.pdf#:~:text=match%20at%20L2229%20the%20Rights,The>.

¹³ Employment Agency of Montenegro, *Work report for the first half of 2025*, [online]. Last accessed 30 July 2025 at: https://www.zzzcg.me/wp-content/uploads/2025/08/lzvjestaj-o-radu-za-prvo-pulugodiste-2025-godine-688c83b3c8b49.pdf?utm_source=chatgpt.com.

¹⁴ Statistical Office of Montenegro-MONSTAT, *Labour Force Survey, 2024*, [online]. Last accessed 30 July 2025 at: <https://www.monstat.org/eng/novosti.php?id=4060#:~:text=MONSTAT%20www.and>.

¹⁵ European Commission, *Multiannual operational programme 2024-2027, 2024*, [online]. Last accessed 29 July 2025 at: https://enlargement.ec.europa.eu/document/download/d92cfd3b-49c2-4ec5-9b70-470204f2244d_en?filename=C_2024_5738_F1_ANNEX_EN_V2_P1_3556535.PDF&prefLang=nl#:~:text=Statistical%20information%20on%20Persons%20with,the%20total%20population%20have%20difficulties.

2 STRATEGIC AND INSTITUTIONAL FRAMEWORK

2.1 Legislative framework

Montenegro's legal framework supporting the employment of persons with disabilities is anchored in several key legislative acts. These include a special law on the vocational rehabilitation and employment of persons with disabilities, comprehensive anti-discrimination laws (general and disability-specific), and general labour and employment legislation that incorporates provisions for persons with disabilities. Each of these laws defines "person with disabilities" for its purposes and outlines the scope of support or protections offered:

Law on Rehabilitation and Employment of Persons with Disabilities (2008)¹⁶ – This is the principal act promoting the employment of people with disabilities. It defines a *person with a disability* as someone with a permanent physical, sensory, mental, or emotional impairment or illness that cannot be remedied by medical treatment, and who faces social and other barriers affecting their working capacity and employment prospects. The law's scope spans an assessment of work capacity, the provision of professional rehabilitation services, and measures to facilitate labour market inclusion on equal terms. Crucially, it establishes an employment quota system: employers with 20–50 employees must hire at least one person with a disability, and those with more than 50 employees must ensure that at least 5% of their workforce are persons with disabilities. Employers who do not meet the quota must pay a special contribution into a designated fund. The law also provides incentives and supports to encourage hiring, such as wage subsidies, grants for workplace adaptations, funding for assistants or equipment, and other active labour market measures for jobseekers with disabilities. Additionally, it regulates "special organisations" (sheltered or supported employment enterprises) and other forms of employment tailored to persons with disabilities. This law was originally adopted in 2008 and amended in 2011 and 2016 to expand and refine its measures. **It remains the central pillar of Montenegro's disability employment policy.**

Law on the Unified Disability Assessment (2025)¹⁷ – adopted in 2025, represents a significant step forward. It establishes a unified assessment procedure, considering medical and functional limitations, barriers in society, and required support for individuals. **It replaced over 40 different commissions across five sectors with a single, unified system** and creates legal certainty and consistent application of disability status decisions, valid across all sectors. The law marks a shift from the traditional medical model to a human right-based model of disability assessment, aligned with the UN Convention on the Rights of Persons with Disabilities (UN CRPD). It established a central body, the "Institute for Unified Disability Expertise" - to conduct assessments.

The new Law on Health and Safety at Work, adopted by the Parliament of Montenegro on 7 April 2026 and published in the Official Gazette of Montenegro No. 051/26 of 15 April 2026, regulates working conditions and employee protection, including for workers with disabilities. The Law transposes key EU occupational safety and health directives, including Directive 89/391/EEC, Directive 92/57/EEC and Directive 91/383/EEC, amidst further harmonisation of secondary legislation with EU directives. In practice, however, employers often lack sufficiently developed occupational safety and health measures and procedures tailored to employees with disabilities. Strengthening workplace risk assessment, reasonable accommodation and employer guidance would help ensure that persons with disabilities can work in safe and adapted working environments

Anti-Discrimination Laws (2010, 2015) – The **General Law on Prohibition of Discrimination**¹⁸ prohibits discrimination on various grounds, including disability, in all aspects of employment (from

¹⁶ Law on Vocational Rehabilitation and Employment of Persons with Disabilities (2008), [online]. Last accessed 23 July 2025 at: https://www.ecoi.net/en/file/local/1038308/1226_1410422214_serbia-law-on-professional-rehabilitation-and-employment-en.pdf#:~:text=Article%203,possibilities%20or%20has%20reduced%20possibilities.

¹⁷ Proposal of the Law on the Unified Disability Assessment, 2025, [online]. Last accessed 02 August 2025 at: <https://www.gov.me/clanak/zakon-o-jedinstvenom-vjestacenju-invaliditeta-novi-pristup-zasnovan-na-ljudskim-pravima>.

¹⁸ General Law on Prohibition of Discrimination (2010), [online]. Last accessed 23 July 2025 at: https://www.ombudsman.co.me/docs/1612165541_zakon-o-zabrani-diskriminacije.pdf.

hiring and vocational training to working conditions and advancement). Building on this, the **Law on Prohibition of Discrimination against Persons with Disabilities (2015)**¹⁹ specifically addresses disability-based discrimination. This law introduced stronger safeguards and high penalties for discrimination against persons with disabilities in education, access to services, work and employment. It mandates reasonable accommodation and measures to ensure equality in the workplace, thereby complementing the vocational rehabilitation law's focus on active support with a rights-based guarantee of equal treatment. Together, these laws provide that no person with a disability may be denied employment or equal working conditions due to disability, and they oblige public institutions (like the Ombudsman and inspectorates) to protect these rights. According to the representative of the Ministry for Human and Minority Rights, the General Law on Prohibition of Discrimination and the Law on Prohibition of Discrimination against Persons with Disabilities will be amended, aiming for strengthening protection mechanisms and aligning national legislation with international standards.

The **Labour Law**²⁰ includes disability as a protected ground: any unequal treatment in employment related to disability issues is forbidden by law. The Labour Law also recognizes that some employees may have *reduced working capacity* due to disability, and it provides for adaptation of working conditions in such cases (e.g., flexibility in work hours or tasks in line with the worker's health capacity). However, some interviewees note that this law's framing remains somewhat medical, presuming diminished capacity of workers with disabilities rather than focusing on removing barriers – an aspect criticized as an ableist approach.

The **Law on Mediation in Employment and Rights of Unemployed Persons**²¹ (often referred to as the Law on Employment and Unemployment Insurance, latest version adopted on 9 January 2026) governs public employment services. This law ensures that **public employment agencies** provide services and active labour market measures for persons with disabilities. According to the law, the Employment Agency of Montenegro is tasked with counselling jobseekers with disabilities, referring them to professional rehabilitation, and including them in specialized training or wage subsidy programmes. The employment service law thus works in tandem with the rehabilitation law – unemployed persons with disabilities (age 15–65) registered with the Employment Agency are entitled to access the rehabilitation programmes, job placement support, and subsidies defined by the special law.

Interviewees, particularly NGOs, pointed out that despite a comprehensive legal framework, implementation and interpretation have lagged:

- **Limited Impact and Unmet Goals:** The 2008 rehabilitation law has now been in force for well over a decade, yet its objectives of boosting employment and inclusion of persons with disabilities remain only partially fulfilled. Many persons with disabilities (especially those with more severe impairments) continue to be excluded from work and remain long-term unemployed.
- **Medical vs. Social Approach:** Montenegrin legislation still reflects a medical/functional rather than human rights-based approach to disability, focusing on “reduced working capacity” and the need for assessment of an individual's remaining abilities. This framing perpetuates stigma by focusing on limitations instead of the responsibility to remove environmental barriers. Some NGOs have called for a “fundamental reform” to ensure that persons with disabilities will be perceived as equal, entitled to reasonable accommodation and support, rather than as objects of charity or lower expectations.
- **Enforcement and interpretation issues:** Although the quota system and anti-discrimination provisions exist formally, enforcement has been problematic. Many employers reportedly prefer to pay the contributions (penalties for not hiring persons with disabilities) rather than fulfil the quota,

¹⁹ Law on Prohibition of Discrimination against Persons with Disabilities (2015), [online]. Last accessed 23 July 2025 at: https://www.ombudsman.co.me/docs/1612165613_zakon-o-zabrani-diskriminacije-lica-sa-invaliditetom.pdf.

²⁰ The Labour Law (2019), [online]. Last accessed 26 July 2025 at: <https://www.gov.me/dokumenta/adf2208f-f45a-4cdc-8b21-db7db1978119>.

²¹ Law on Prohibition of Discrimination against Persons with Disabilities (2019), [online]. Last accessed 23 July 2025 at: https://www.ombudsman.co.me/docs/1612165613_zakon-o-zabrani-diskriminacije-lica-sa-invaliditetom.pdf.

viewing it as a simpler cost of business. This tendency, combined with weak oversight, has limited the quota's effectiveness in practice. Even public sector institutions have often failed to meet the required 5% employment target.

- **Adapting legislation to the specific needs of persons with disabilities.** Occupational safety and health legislation should be amended to explicitly require workplaces to be both safe and accessible for persons with disabilities. This should cover not only accessibility within the workplace, but also safe and accessible access to and from the workplace. Existing by-laws should also be supplemented to require individual occupational safety and health measures tailored to persons with disabilities, alongside collective measures, including appropriate use of adapted equipment, tools and assistive devices through professional rehabilitation.
- **Incomplete Regulation and Policy Gaps:** There are also gaps in the secondary regulations. According to the NGO representatives of persons with disabilities, while the 2008 law provided for the establishment of special work centres and sheltered workshops for those persons with disabilities, the responsible Ministry has long failed to issue the by-laws defining how these centres should operate. As a result, such sheltered employment options exist only formally.

As of April 2025, **Montenegro launched a comprehensive reform of the Law on Professional Rehabilitation and Employment of Persons with Disabilities**, following stalled amendments from 2018–2019²² and contested draft changes in 2022 that faced strong opposition from disability organisations. At a breakthrough meeting on 22 April 2025, government representatives and organisations of persons with disabilities agreed to develop a new draft law from scratch. Importantly, at least three NGO representatives will participate as full members of the working group, with a draft expected by the end of 2026. The reform is expected to address key issues such as refining the quota and contribution system, adjusting subsidy levels to ensure both effectiveness and fiscal sustainability, clarifying eligibility definitions in line with the new disability assessment system, closing loopholes and preventing misuse of funds, as well as aligning provisions with EU practices, including reasonable accommodation obligations and potentially social enterprise models.

In parallel, a revised **Rulebook on conditions, criteria, and procedures for accessing subsidies** was adopted in early 2025. This regulation clarifies application procedures, documentation, and timelines, and reflects recent changes such as minimum wage increases. It aims to improve transparency, consistency, and administration of subsidies, ensuring employers understand available support and persons with disabilities benefit from clearer and more predictable employment support measures.

2.2 Strategic framework

Montenegro **ratified the UN Convention on the Rights of Persons with Disabilities (CRPD) in 2009**, including its Optional Protocol. Following ratification, Montenegro submitted an Initial Report to the CRPD Committee and received concluding observations that now guide reforms. Montenegro has pledged to address these recommendations through its strategic plans – including the **Action Plan to implement the CRPD Committee's recommendations 2026-2030**²³ as part of its EU accession commitments. This plan sets time-bound actions across ministries, including replacing guardianship with supported decision-making, expanding inclusive education and enforcing employment quotas.

²² European Commission (2019), Montenegro 2019 Report: *Communication from the Commission to the European Parliament, The Council, The European Economic and Social committee and the Committee of Regions*, [online]. Last accessed 7 August 2025 at: https://enlargement.ec.europa.eu/document/download/e5f886d9-191e-46fc-aac8-3fd7912735f8_en?filename=20190529-montenegro-report.pdf#:~:text=Rights%20of%20Persons%20with%20Disabilities,needs%20to%20ensure%20adequate%20and.https://www.linkedin.com/redir/redirect?url=https%3A%2F%2Fwww.gov.me%2Fdokumenta%2F5f7f8327-7c41-409d-a827-e80a3745e022&urlhash=oMBZ&isSdui=true&lipi=urn%3Ali%3Apage%3Ad_flagship3_profile_view_base%3BZqnbzZwFQ%2Bu2p9vG4Pv6KA%3D%3D

²³ Ministry of Human and Minority Rights of Montenegro (2022), *Action Plan to implement the CRPD Committee's recommendations 2026-2030*, [online]. Last accessed 20 October 2025 at: https://www.linkedin.com/redir/redirect?url=https%3A%2F%2Fwww.gov.me%2Fdokumenta%2F5f7f8327-7c41-409d-a827-e80a3745e022&urlhash=oMBZ&isSdui=true&lipi=urn%3Ali%3Apage%3Ad_flagship3_profile_view_base%3BZqnbzZwFQ%2Bu2p9vG4Pv6KA%3D%3D

The flagship national policy is the **Strategy for Protection of Persons with Disabilities from Discrimination and Promotion of Equality 2022–2027**²⁴, adopted in July 2022. Its overall aim is to ensure full equality and protection of the rights of persons with disabilities through a comprehensive approach. It covers key areas including accessibility, social protection and independent living, education and training, health care, participation in public life, cultural and sports inclusion, and employment.

For each area, the strategy identifies challenges and sets specific measures. The chapter on vocational rehabilitation, work, and employment highlights barriers such as prejudice and lack of workplace accommodations, and proposes actions to improve accessibility, strengthen vocational rehabilitation, and align labour laws with CRPD standards. It also calls for legal reforms, including recognition of the right to reasonable accommodation, and more effective use of active labour market measures. A biannual Action Plan supports implementation of the strategy.

Ensuring persons with disabilities can participate in the labour market is a priority echoed in broader strategies. The **National Employment Strategy 2021–2025**²⁵, adopted in December 2021, provides the strategic framework for employment policy up to 2025. The strategy's overarching goal is sustainable employment growth based on equal access to the labour market, decent work, skills development, and greater social inclusion. One of the strategy's operational objectives is to improve the position of unemployed persons in the labour market through efficient services and ALMP measures, strengthening social inclusion and reducing poverty. This objective encompasses tailored support for those remote from the labour market, which would include many persons with disabilities. In practice, persons with disabilities are a recognized target group in Montenegro's employment action plans.

There are other **sectoral strategies** that relate to persons with disabilities. The **Inclusive Education Strategy 2019–2025**²⁶ sets directions for educating children with special needs in mainstream schools, aiming at better long-term employability and social inclusion of young persons with disabilities. The **National Strategy for Gender Equality 2025–2029**²⁷ includes measures focusing on women and girls with disabilities, following CRPD guidance to incorporate a disability perspective in gender policies. The disability equality strategy, in turn, has a dedicated section on women with disabilities, ensuring cross-cutting issues are addressed in both policy spheres. A new **Youth Strategy 2023–2027**²⁸ indicates youth with disabilities as one of its target groups. However, interviewees point out that some national strategies (including youth strategies) have not consistently mainstreamed disability issues or consulted disability experts during the drafting process.

In 2024, the Government adopted the **Youth Guarantee Programme Implementation Plan until 2026**²⁹. It is embedded in the broader National Employment Strategy and youth labour market policies. Youth with disabilities are explicitly mentioned as a vulnerable group in employment policy/programmes in Montenegro.

Montenegro's **Strategy for Social and Child Protection (2025–2028)**³⁰ includes objectives to improve support services, community living, and social inclusion for Persons with disabilities as part of broader welfare reforms. The government has been pursuing **deinstitutionalisation** – moving away

²⁴ Ministry of Human and Minority Rights of Montenegro (2022), *Strategy for Protection of Persons with Disabilities from Discrimination and Promotion of Equality 2022–2027*, [online]. Last accessed 20 July 2025 at: <https://www.gov.me/dokumenta/e9659c4e-e7f6-41f2-ab98-0fd115b80601>.

²⁵ *National Employment Strategy 2021–2025*, Ministry of Labour, Employment and Social Dialogue of Montenegro, Accessed: 01 August 2025, Available at: <https://www.zzzcg.me/wp-content/uploads/2022/02/predlog-nacionalne-strategije-zaposljavanja-2021-2025-s-predlogom-akcionog-plana-zaposljavanja-za-2021-godinu.pdf>.

²⁶ Ministry of Education of Montenegro, *The Strategy for Inclusive Education 2019–2025*, [online]. Last accessed 01 August 2025 at: <https://www.gov.me/dokumenta/fbeec964-7c59-4b5a-a54e-8417281160ba>.

²⁷ Ministry of Human and Minority Rights of Montenegro (2022), *National Strategy for Gender Equality 2026–2029*, [online]. Last accessed 03 August 2025 at: <https://wapi.gov.me/download/4f708a54-eb1d-4c81-9641-8c7abc34abac?version=1.0>.

²⁸ *Youth Strategy 2023–2027*, Ministry of Sport and Youth of Montenegro, Accessed: 01 August 2025, Available at: <https://www.gov.me/dokumenta/c27c88df-e903-422d-b789-379490c307cf>.

²⁹ Youth Guarantee Program Implementation Plan until 2026, Accessed: 20 October 2025, Available at: <https://www.gov.me/clanak/usvojen-plan-implementacije-programa-garancija-za-mlade-do-2026-godine>.

³⁰ Ministry of Social Welfare, Family Care and Demography of Montenegro, *Strategy for Social and Child Protection (2025–2029)*, [online]. Last accessed 01 August 2025 at: <https://www.gov.me/dokumenta/bb77fe25-5ffd-43a2-9313-738e0e0b725e>.

from placing persons with disabilities in residential institutions towards community-based services. A new **Deinstitutionalisation Strategy 2025–2028**³¹ was adopted, aligning with the commitment to enable independent living for persons with disabilities in the community. While primarily focused on care, these social policies indirectly affect employability (e.g., through improving education access, by providing assistive services that enable a person to work, etc.). Montenegro has also adopted a **Strategy for the Social Inclusion of Roma and Egyptians 2021–2025**³², which – while centred on another marginalized group – reaffirms principles of equal rights for all, including addressing the employment of persons with disabilities from Roma and Egyptian populations.

Overall, persons with disabilities are often mentioned as a specific category in strategies related to social inclusion, poverty reduction, education, and employment. However, an analysis from 2025 found that some national strategies lacked a fully developed disability dimension – only four out of seven key strategies examined had included disability policy for the most part, and one had not included it at all³³. Employment and education strategies usually do recognise persons with disabilities, but other plans (e.g., in governance reform or certain sectoral plans) may overlook the specific needs of this group.

The current key national disability strategy runs until 2027. According to interviewees, there is recognition that the next strategy might need to focus more on implementation and measurable outcomes. Any new strategic document would also need to integrate the results of ongoing reforms. The mainstream consensus has the National Employment Strategy expiring at end-2025, while the Ministry of Labour is planning to draft a new Employment Strategy for 2026 onward, in line with EU policy frameworks, followed by the new Youth Guarantee implementation plan. It is thus crucial that the next employment strategy explicitly include targets for employment of persons with disabilities – for instance, by measuring the unemployment gap between persons with disabilities and others and creating an accessible database, developing measures to reduce the unemployment rate of persons with disabilities, or increasing the number of employers who utilise subsidy programmes.

2.3 Institutional framework

The **Ministry of Labour, Employment and Social Dialogue**³⁴ is the lead government body for employment policy, including the employment of persons with disabilities. The Ministry is responsible for policies, including the regulatory framework – especially the **Law on Professional Rehabilitation and Employment of Persons with Disabilities** and related by-laws. The Ministry sets national strategies and action plans for employment and social inclusion of persons with disabilities and oversees the implementation of vocational rehabilitation measures. It also coordinates with other ministries on disability issues, specifically with the Ministry of Health on medical aspects and the Ministry of Education on inclusive education/vocational training.

The **Employment Agency of Montenegro**³⁵ (EAM) plays a central role in supporting the employment and labour market inclusion of persons with disabilities, delivering labour market services and measures for persons with disabilities and employers. EAM's responsibilities in disability employment include:

- coordinating professional rehabilitation assessments and referrals,
- implementing active labour market measures (e.g., training, wage subsidies, public works),

³¹ *Deinstitutionalization Strategy 2025–2028*, Ministry of Social Welfare, Family Care and Demography of Montenegro, Accessed: 01 August 2025, Available at: <https://www.gov.me/dokumenta/ae125913-ef38-4dd2-bc90-3e8d38a18a62>.

³² *Strategy for the Social Inclusion of Roma and Egyptians 2021–2025*, Ministry of Human and Minority Rights of Montenegro, 2022, Accessed: 20 July 2025, Available at: <https://www.gov.me/clanak/strategija-socijalne-inkluzije-roma-i-egipcana-u-crnoj-gori-2021-2025>.

³³ Association of the Blind of Montenegro, *Analysis of the gender dimension of seven strategic documents*, 2025, Accessed: 01 August 2025, Available at: <https://ss-cg.org/?p=5266>.

³⁴ Ministry of Labour, Employment and Social Dialogue of Montenegro, Website: <https://www.gov.me/mrzs>.

³⁵ The Employment Agency of Montenegro, Official Website, [online]. Last accessed 24 November 2025 at: <https://www.zzzcg.me/>.

- providing vocational counselling and career guidance, and
- monitoring employer compliance with quota obligations and subsidy conditions.

At the national level, the Employment Agency of Montenegro (EAM) operates through a **Central Service** responsible for labour market programmes and administration of the Disability Fund. It prepares annual operational plans, including targets for supporting persons with disabilities, and coordinates policy implementation with the Ministry of Labour.

Given Montenegro's small size, service delivery is relatively centralised, although EAM maintains local offices covering all municipalities. These offices serve as the main access point for persons with disabilities. They register jobseekers, develop individual employment plans, provide counselling, and refer clients to vocational rehabilitation, training, or employment programmes. Local offices also administer employer incentives under the quota system, including wage subsidies, workplace adaptation grants, and financing of workplace assistants. Access to these measures is often linked to completion of professional rehabilitation coordinated by EAM with licensed providers.

EAM thus performs a dual role of supporting persons with disabilities in accessing employment and administering financial incentives to employers. It also engages employers through outreach and awareness activities, including targeted job fairs and information sessions.

The Agency maintains administrative records on employment outcomes and employer contributions and reports on programme implementation. However, outdated IT systems have limited efficiency in service delivery and data management. Ongoing modernization efforts, including EAM's participation in European PES benchlearning, aim to strengthen digital systems, monitoring, and operational effectiveness.

At the local level, service quality varies due to uneven availability of specialized expertise, such as disability-trained counsellors or accessible communication support. Administrative procedures for accessing subsidies can also be complex, requiring multiple certifications and documentation, although EAM provides support to employers and jobseekers in navigating these processes.

The **Fund for Professional Rehabilitation and Employment of Persons with Disabilities (FPREP)**³⁶ forms an integral part of the Employment Agency of Montenegro by financing disability employment measures. The Fund was established by the 2008 law as a mechanism to enforce the quota system and support programmes. The funds from the quota mechanism are earmarked exclusively for vocational rehabilitation and employment supports. The Fund is governed by a multi-stakeholder Council of nine members, four of whom represent disability organizations, ensuring that persons with disabilities have a voice in guiding Fund priorities. The Ministry supervises the Fund's regulations, while the Employment Agency of Montenegro administers it. The Fund's mandate covers: financing vocational training for unemployed persons with disabilities, workplace adaptation grants, subsidies for salaries, contributions toward personal assistants at work, and even favourable loans for self-employment. It constitutes the financial backbone for many active labour market policies targeting persons with disabilities. However, the effective use of this Fund has raised concerns.

The **Ministry of Social Welfare, Family Care and Demography of Montenegro** plays a key role in ensuring access to social services. It is responsible for policies regarding social protection, personal assistance, day care, and community-based support. It supervises the network of social welfare centres and specialized institutions, providing counselling, rehabilitation, and social inclusion services to persons with disabilities. It also oversees financial benefits and support schemes for families and caregivers. In cooperation with local governments and civil society organizations, the Ministry works to strengthen community-based services and to shift away from institutional care.

The **Ministry of Sports and Youth** promotes the inclusion of persons with disabilities in sports, recreation and youth activity programmes. It works to ensure that sports facilities, training and competitions are accessible to persons with disabilities and supports organisations and clubs that

³⁶ Fund for Professional Rehabilitation and Employment of Persons with Disabilities;
Website: <https://www.zzzcg.me/programi/zaposljavanje-lica-sa-invaliditetom/>.

facilitate their participation. It also promotes the inclusion of young persons with disabilities in educational, cultural and volunteering activities.

The **Ministry of Education, Science and Innovation** is responsible for ensuring equal access to education for persons with disabilities across all levels of the education system. It develops and implements inclusive education policies, while also maintaining specialized programmes where necessary. The Ministry ensures that curricula, teaching materials, and school infrastructure are adapted to diverse learning needs, and it provides continuous training for educators and school staff to strengthen inclusive teaching practices. In cooperation with local governments, civil society, and families, it promotes early intervention, individualized education plans, and the use of assistive technologies that enhance learning and participation.

Other Relevant National Bodies: In addition to the above, other institutions contribute to the framework. The **Ministry of Human and Minority Rights** hosts a **Directorate for Protection and Equality of Persons with Disabilities** and co-chairs the national Council. It focuses on human rights advocacy, anti-discrimination and inclusion, complementing the labour-market perspective with a rights-based approach. Montenegro's **Protector of Human Rights and Freedoms (Ombudsperson)** oversees complaints, including workplace discrimination against persons with disabilities. Finally, the **Fund for Pension and Disability Insurance** (social insurance fund) is responsible for disability pensions and medical assessments for incapacity – it operates separate commissions to determine disability degrees for benefits. The recent reforms in this regard were described above.

Beyond the mainstream employment offices, Montenegro has developed specialized institutions to provide professional rehabilitation and skills training for persons with disabilities, with the **Centre for Professional Rehabilitation** in Podgorica serving as a focal point. This public institution was established by the Government in 2017. The Centre organizes and delivers professional rehabilitation services in a more structured and expert manner, addressing a gap in tailored training for persons with disabilities. Equipped with modern facilities and assistive technology, the Centre offers a range of programmes, including: occupational assessment, skills development courses, retraining programmes, workplace orientation, and social inclusion activities to build soft skills. It also serves as a hub for developing new methodologies and introducing technologies in rehabilitation (for instance, specialized computer software for the visually impaired, or ergonomic adaptations for those with physical disabilities). Additionally, the Centre provides training and professional development for staff involved in rehabilitation – building a cadre of specialists (therapists, vocational trainers, job coaches) who can better support clients.

Civil society organisations play a vital role in Montenegro's support system for employing persons with disabilities. **NGOs and Persons with Disabilities Organizations (PDOs)** often act as service providers, advocates, and liaisons between individuals and the state institutions. NGOs are key stakeholders in identifying gaps and overlaps in the institutional framework. Through reports and public statements, they have highlighted issues such as the **under-utilisation of the Fund** and the lack of involvement of persons with disabilities organisations in decision-making. The relationship between NGOs and state institutions is evolving toward partnership, with NGOs sitting on formal bodies like the Fund Council (with four NGO reps influencing funding decisions) and the Government Council (five NGO members contributing to policy).

Institutional Capacity: Strengths and Gaps

The institutional framework in Montenegro has many of the necessary components to support employment of persons with disabilities – dedicated laws and funding, a central service provider (EAM) with local presence, specialized rehab facilities, and active NGOs. However, the effectiveness of this framework depends on the capacity and the coordination of these stakeholders. A critical assessment has revealed both strengths and notable capacity gaps.

Montenegro's framework benefits from a solid legal foundation, including a quota system with enforceable contributions, anti-discrimination laws and the political will to reform (evidenced by recent initiatives). There is formal recognition of the principle of inclusion – e.g., **workers with disabilities are legally guaranteed equality in working ability and conditions under the Labour Law**. Additionally,

the availability of significant financial resources via the Fund provides a tool to incentivise employers and finance programmes. The creation of the national Rehabilitation Centre indicates a commitment to invest in adequate services. Finally, the active civil society and donor interest indicate that there is external pressure and support to keep improving.

On the operational front, there is an ongoing push to digitalise services. For EAM, this includes developing online systems for jobseekers and for employers. Concerns that ensuring these are accessible to persons with various disabilities are being addressed. These tech reforms imply that institutions will share data more effectively, resulting in less paperwork for clients.

2.4 Coordination and cooperation mechanisms

At the national level, Montenegro has established several formal bodies to facilitate communication and coordinated policymaking on disability employment issues. The **Council for the Rights of Persons with Disabilities** is a high-level inter-agency body re-launched in 2024 after a prolonged delay³⁷. Chaired by the Deputy Prime Minister, this Council includes ministries (Labour, Health, Education, Human Rights, etc.), the national Employment Agency, and representatives of NGOs of Persons with disabilities³⁸. The Council is tasked with synchronising and monitoring governmental policies. Its creation was spurred by Montenegro's obligations under the UN CRPD and EU accession benchmarks, reflecting a formal commitment to cross-sector coordination. In principle, this Council should serve as a central hub for policy dialogue, ensuring that all policy instruments are consulted with all relevant actors. However, the initial Council meetings only began in 2024–25, and it has yet to be able to fully exercise its functions.

The **Council for Cooperation between the Government and NGOs**³⁹ institutionalises civil society participation across policy areas. While the Council should include NGO representatives, it has been inactive since 2021. Thus, disability NGOs must primarily channel input through the new Council for the Rights of Persons with Disabilities itself. The NGO–Government Council must be reactivated (as recommended in EU progress reports and civil-society reviews) if it is to provide a genuine cross-sectoral dialogue. The situation of both Councils underscores how coordination and two-way communication between state and civil society on disability issues is still merely weak or symbolic.

The national Parliament also contributes to formal coordination through its committees. The **Parliamentary Committee on Human Rights and Freedoms** regularly considers issues of the persons with disabilities and can call hearings or review laws impacting disability rights. Parliamentary scrutiny and debate provide another layer of coordination, as MPs work with ministry officials, the Ombudsperson, and NGOs when addressing legislative reforms (for example, in debating a pending Law on Professional Rehabilitation and Employment of Persons with disabilities).

Additionally, Montenegro reports that persons with disabilities and their advocates are included in many working groups drafting legislation and strategies. In recent years, representatives from disability NGOs have sat on working groups for the new anti-discrimination laws, the strategy on the protection of persons with disabilities from discrimination, and the reform of the disability assessment system. These working groups are formal, time-bound coordination mechanisms that bring together public officials, experts, and civil society to develop specific policies or legal proposals.

Coordination and cooperation are also structured at the **local government level** in Montenegro. Many municipalities have formed their own **Councils for Persons with Disabilities** to advise on local policies and ensure inclusion of people with disabilities in community life. These are typically working bodies of the elected municipal assemblies. For example, the Municipality of Bijelo Polje's local

³⁷ *Decision on the Establishment of the Council for the Rights of Persons with Disabilities*, ("Official Gazette of Montenegro", No. 105/2024).

³⁸ Government of Montenegro, *Constitutive meeting of the Government Council for the Rights of Persons with Disabilities*. Available at: <https://www.gov.me/en/article/constitutive-meeting-of-the-government-council-for-the-rights-of-Persons-with-disabilities>.

³⁹ *Decision on the Council for Cooperation between State Administration Bodies and Non-Governmental Organizations*, ("Official Gazette of Montenegro", No. 19/25).

council⁴⁰ is mandated to consider “proposals of decisions and other acts related to the status and rights of Persons with disabilities” and to initiate measures in various areas – from accessible public services to employment and vocational training at the local level. It reviews issues such as accessible urban planning, inclusive education, local employment programmes for people with disabilities, and it can propose local tax relief or incentives for companies that hire persons with disabilities. Such councils usually include a mix of local officials and representatives from disability associations in the community. In Bijelo Polje’s case, the Council’s membership (a chairperson and several members) includes persons with disabilities. Other municipalities – Nikšić, Herceg Novi, Ulcinj, and others – have either established or are in the process of setting up similar bodies to institutionalise communication between local authorities and persons with disabilities.

Effective service delivery requires smooth coordination between institutions. In the past, a lack of communication between e.g., the health commissions and EAM meant delays in recognizing someone’s work capability. The new unified commission should provide a structural fix for that. However, coordination is also needed in everyday processes – for example, when a person with disability approaches the EAM, there should ideally be a streamlined referral to the rehabilitation centre or to an NGO programme if appropriate.

2.5 Sources of financing

The **Fund for Professional Rehabilitation and Employment of Persons with Disabilities** provides the cornerstone of financing for disability employment in Montenegro⁴¹. The Fund’s resources come primarily from a mandatory contribution paid by employers who do not meet quotas for hiring people with disabilities, i.e., a monthly contribution equal to 20% of the average national salary for each required position not filled by a person with disability. The Fund may also receive financing from the state budget, local government budgets, donations, and other sources. In practice, up until recently, the Fund was financed almost exclusively by employer contributions, with minimal direct input from other sources.

The Fund’s mandate is to finance a range of measures to improve employment opportunities for persons with disabilities. This includes funding professional rehabilitation services (training, vocational rehabilitation for unemployed or employed persons with disabilities), co-financing specialised organisations that employ persons with disabilities, implementing active labour market programmes targeted at persons with disabilities, paying wage subsidies to employers who hire individuals with disabilities, financing grant schemes for projects that promote disability employment, and providing financial assistance (such as stipends during training or self-employment support).

The scale of financing through the Fund has grown in recent years. Between 2018 and 2020, a total of approximately **€27.37 million annually** was spent via this Fund on professional rehabilitation and employment measures for persons with disabilities⁴². This amount included **€13.1 million** for wage subsidies, **€1.13 million** for professional rehabilitation services, with **€8.1 million** funding various grant schemes (project-based initiatives) during that three-year period. Additionally, a small amount – €30 000 in 2020 – was dedicated to supporting entrepreneurship for persons with disabilities⁴³.

Annual expenditures have continued to rise. For the implementation of the programme for professional rehabilitation and employment of persons with disabilities during the period 1 January – 30 June 2025, a total of **€20 million** was spent. For the implementation of the same programme in 2023, **€24 million** was spent, while in 2024, the amount spent was **€35.7 million**. This rapid increase is tied to a growing

⁴⁰ Municipality of Bijelo Polje, *Local Council for Persons with Disabilities*, [online]. Last accessed 24 November 2025 at: <https://so.bijelopolje.co.me/index.php/radna-tjela/savjeti/savjet-za-osobe-sa-invaliditetom>.

⁴¹ Fund for Professional Rehabilitation and Employment of Persons with Disabilities, Internal Procedure, [online]. Last accessed 24 November 2025 at: <https://zzzcg.me/folder/normativa/interne-procedure/interne-procedura-centralna-sluzba/fond-za-profesionalnu-rehabilitaciju-i-zaposljavanje-lica-sa-invaliditetom/>.

⁴² UNPRPD (2021), *Situational analysis of the rights of Persons with disabilities in Montenegro*, [online]. Last accessed 15 August 2025 at: https://unprpd.org/new/wp-content/uploads/2023/12/CR_Montenegro_2021-51b.pdf#:~:text=Between%202018,of%20Persons%20with%20disabilities%20in.

⁴³ Ibid.

number of registered employees with disabilities qualifying for subsidies and, in some cases, very high reported wages for those employees (since the subsidy can cover up to 75% of the gross wage per the law, and there is no upper limit of wages to be subsidised)⁴⁴.

The **State Budget of Montenegro**⁴⁵ is expected to co-finance measures for professional rehabilitation and employment of persons with disabilities. In practice, however, direct state budget allocations to these programmes were initially limited. In recent years, as the costs of disability employment subsidies have grown, the national budget has increasingly stepped in to fill funding gaps. For example, the 2024 state budget earmarked about **€20 million** for wage subsidies to employers of persons with disabilities, largely driven by the general increase in average wages that occurred during 2024, but rising demand showed that an additional **€10 million** had to be provided through a mid-year budget rebalancing. This reflects the state's role as a "guarantor", ensuring that all subsidy obligations are paid even when designated funds fall short.

Montenegro's legal framework also envisions financial contributions from **local self-government units** (municipalities) to support the employment of persons with disabilities. Municipalities can allocate part of their local resources to disability employment initiatives, and they are eligible to participate in or co-fund projects (some municipalities have applied for and received grants for local disability employment projects). However, in the past five years, the role of municipal budgets has been relatively limited. There is little evidence of significant direct funding from municipalities. Instead, most funding for disability employment programmes is centralised. Local governments have primarily participated as partners or implementers of projects financed by the national Fund, rather than as major independent financiers.

⁴⁴ Vijesti (2024), *Disputable Disabilities are Ravaging the State Budget*, [online]. Last accessed 13 August 2025 at: <https://en.vijesti.me/vijesti/ekonomija/720207/sporni-invaliditeti-pustose-drzavni-budzet#:~:text=In%202022%2C%20a%20total%20of,amount%20by%20another%20ten%20million.>

⁴⁵ The Law on the Budget (2025), [online]. Last accessed 14 August 2025 at: <https://www.gov.me/dokumenta/01c1ccb2-f0e3-4a20-aa33-8377185539fe>.

3 POLICIES SUPPORTING EMPLOYABILITY OF PERSONS WITH DISABILITIES

3.1 Services supporting employability of persons with disabilities

The Employment Agency of Montenegro is the central provider of employability services for jobseekers, including persons with disabilities. Universal services – such as job matching, career counselling, and active labour market programmes (ALMPs) like training or self-employment grants – are in principle open to all registered unemployed, including those with disabilities. For example, the 2025 EAM work plan⁴⁶ emphasises improving individual profiling, motivational counselling workshops, and individual employment plans for every jobseeker.

Vocational counselling and job placement support: every registered unemployed person, including those with disabilities, is assigned an employment counsellor at the Employment Agency. Persons with disabilities are entitled to an Individual Employment Plan that may include additional guidance or a longer preparation phase. However, there are no dedicated disability employment counsellors or units. Counselling services are formally equal for all unemployed but may not always have the expertise to address disability-related needs. This is an area where Montenegro's system still relies on a general approach (a *universal service*) rather than a tailored one, potentially limiting its effectiveness for persons with disabilities.

It would be recommended to apply reasonable accommodations in employment services – meaning flexible approaches like longer counselling sessions, accessible communication (e.g., sign language interpretation), or mentorship programmes for job-seekers with disabilities. Currently, such accommodations are often understood narrowly as physical accessibility improvements, and NGO representatives argue for broader implementation of support.

Montenegro also has dedicated programmes for persons with disabilities. The Law on Professional Rehabilitation and Employment of Persons with Disabilities⁴⁷ mandates a system of *professional rehabilitation* services and employer incentives. Key provisions include:

- **Professional Rehabilitation Services:** Unemployed persons with disabilities who have reduced work capacity are entitled to tailored rehabilitation plans to improve their employability. These services – often delivered by authorised external providers – encompass a wide range of support measures, such as individual counselling and motivation for active job search, assessment of remaining work capacity, career guidance, development of social and work skills, and on-the-job training or mentoring. Support continues into employment as needed, with follow-up of the person at the workplace and evaluation of their work performance. The aim is to address the multiple barriers that persons with disabilities face. While these measures are comprehensive on paper, they reach only a portion of Persons with Disabilities (discussed further below).
- **Career Guidance and Counselling:** Through the *Professional Information and Counselling (ZOPT)* centers at EAM, every registered jobseeker, including persons with disabilities, can receive individualised career guidance. This service helps persons with disabilities identify suitable occupations, training paths and vacancies.
- **Job Placement and Mediation:** EAM actively **matches persons with disabilities with vacancies**. Persons with disabilities jobseekers can use the public *Zaposliosi.me* online portal, which advertises job vacancies for persons with disabilities and allows employers to search for qualified candidates. In practice, only a handful of specialists are dedicated to the placement of

⁴⁶ The Employment Agency of Montenegro, Work Programme of the Employment Agency of Montenegro for 2025, [online]. Last accessed 16 August 2025 at: <https://zzzcg.me/wp-content/uploads/2025/08/Program-rada-ZZZCG-za-2025.-godinu.pdf>.

⁴⁷ Law on Professional Rehabilitation and Employment of Persons with Disabilities.

persons with disabilities. The EAM disability unit liaises with local employers, social services and NGOs to fill tailored vacancies.

Overall, the EAM serves as the hub coordinating both “mainstream” employment services and disability-specific supports. A registered person with a disability works with EAM counsellors to develop an individual employment plan, which is obligatory for all jobseekers. Persons with disabilities are expected to actively seek work and accept suitable job offers, but they can also access the specialised professional rehabilitation programme if their disability hinders direct entry to the labour market. After undergoing rehabilitation measures, an expert provider issues an opinion on the person’s employment prospects and any support needs, which feeds back into job matching. The EAM also convenes a Disability Assessment Commission to determine the official percentage of disability for programme eligibility⁴⁸.

Accessibility, Quality, and Relevance of Services

A critical analysis of Montenegro’s employability services for persons with disabilities reveals several issues regarding **accessibility**, **service quality**, and **relevance to needs**:

- **Ensuring access to EAM services for persons with disabilities remains challenging.** Many offices lack full physical accessibility, limiting independent access for wheelchair users. Disability NGOs report that recent Ministry materials were inaccessible to people with visual impairments. The EAM and government recognize the need for barrier-free services; however, accessibility gaps persist.
- **Adequacy of Counselling and Individualised Support:** EAM caseworkers handle all unemployed clients, including persons with disabilities, displaying varying levels of experience and no clear evidence of specialized training. The 2025 work plan⁴⁹ includes measures to improve profiling, motivation, and individual employment plans for all unemployed persons. Heavy caseloads and administrative focus on subsidy payments may limit attention to individualized counselling and job coaching for persons with disabilities.
- **Relevance and Matching to Labour Market Needs:** The relevance of the services refers to whether they address the real needs of persons with disabilities and lead to jobs suited to their skills and aspirations. Currently, many persons with disabilities obtain jobs in response to the quota – these can be *low-skill* or *entry-level positions* that employers have available. Representatives of NGOs for persons with disabilities are concerned that persons with disabilities with higher education or those capable of more advanced roles might not be receiving support to find appropriate employment. Instead, they might be slotted into any available subsidized vacancy. The professional rehabilitation measures do include vocational guidance and training aimed at aligning a person’s goals with opportunities. Yet the fact that a significant number of persons with disabilities are being hired primarily due to financial incentives raises the question of whether the jobs are genuinely matched to the individuals. Some employers might create a position simply to utilize the subsidy, without much consideration of the person’s career growth. To improve relevance, the system would need to focus on *skills development in demand areas* and on engaging a broader range of employers beyond those seeking subsidies. It is encouraging to note the appearance of initiatives like adult IT skills training programmes in Nikšić include persons with disabilities⁵⁰, clearly acknowledging the importance of upskilling persons with disabilities in competitive fields.

⁴⁸ UNDP in Montenegro (2024), EU integration as a path to equal opportunities and enhanced rights for Persons with disabilities, [online]. Last accessed 18 August 2025 at: <https://www.undp.org/montenegro/press-releases/eu-integration-path-equal-opportunities-and-enhanced-rights-Persons-disabilities>.

⁴⁹ The Employment Agency of Montenegro, *Work Programme of the Employment Agency of Montenegro for 2025*, Accessed: 16 August 2025, Available at: <https://zzzcg.me/wp-content/uploads/2025/08/Program-rada-ZZZCG-za-2025.-godinu.pdf>.

⁵⁰ Radio and Television of Montenegro, Employment Agency of Montenegro: *Half a Million Euros for 10 Employment Projects for Persons with Disabilities*, 2025, Accessed: 18 August 2025, Available at: <https://rtcg.me/vijesti/drustvo/731966/zzzcg-pola-miliona-eura-za-10-projekata-zaposljavanja-osoba-sa-invaliditetom>.

3.2 Measures supporting employability of persons with disabilities

Like other jobseekers, persons with disabilities can access the universal active labour market programmes offered by the Employment Agency. These programmes include:

- **Vocational education and training courses** to gain professional qualifications or key skills;
- **On-the-job training with employers** (internship or apprenticeship-style programmes); and,
- **Training for independent work** (traineeships aimed at recent graduates to gain work experience).

Participation of persons with disabilities in those measures is financed by the Disabilities Fund. For instance, when someone with a disability joins the “Training for Independent Work” programme, EAM uses the Fund to pay all related expenses — including the participant’s stipend and mentor costs. By contrast, for participants without disabilities, only the net salary is covered. This means that the Fund helps make general training programmes more accessible and affordable for persons with disabilities.

Despite these accommodations, participation of persons with disabilities in mainstream programmes remains very low. Out of 626 total participants in EAM training programmes during 2024, only 19 were persons with disabilities (3%). This figure is strikingly disproportionate, given that persons with disabilities represent one-fourth of Montenegro’s unemployed. The low uptake suggests potential barriers and deficiencies – such as insufficient outreach, lack of adapted training content, or accessibility issues – that keep many job-seekers with disabilities from benefitting from general employment services. It also indicates a heavy reliance on the *targeted* measures (described in the next part) to address the needs of persons with disabilities, since the “universal” measures have not been fully inclusive in practice.

The Government runs a “**Professional Training for Graduates**” programme, a paid 9-month traineeship for unemployed university graduates. Calls are issued annually (e.g., September 2024), inviting public and private employers to host trainees. Persons with disabilities with a university degree are eligible under the same terms as other registered jobseekers. The program does not have a separate disability track. This is the main government-led scheme aimed at giving recent graduates work experience and “independent work” skills.

To complement general programs, Montenegro has developed **professional rehabilitation services** dedicated to persons with disabilities. These services aim to equip persons with disabilities with the skills, guidance, and support needed to enter or re-enter the workforce. Funded by the contributions described above, they form a parallel track of active labour market measures specifically tailored to persons with disabilities.

Montenegrin law also recognizes “**special employment organizations**” – a form of sheltered workshop or enterprise that exclusively employs persons with disabilities – and allows the state to co-fund such organizations. In theory, this measure could create protected jobs for those persons with disabilities who may not immediately compete in the open labour market. However, NGO representatives report that these provisions have “not functioned in practice” and no sustainable sheltered employment system has been developed. In fact, they argue that this legal concept is outdated and contributes to segregation and instead advocate for integrating persons with disabilities into the open labour market with appropriate support. As of 2025, the government was still in the process of finalizing rulebooks for financing special employment organizations – an indication that this measure exists on paper but remains largely unimplemented.

3.3 Services and measures addressing needs of war veterans

The Public Employment Service (The Employment Agency of Montenegro) does not operate dedicated veteran-specific employment programs. War veterans of working age generally access the same job brokerage, training, and active labour market measures as other jobseekers. There is no evidence of tailored counselling or reintegration schemes exclusively for veterans. Instead, veterans typically fall under general categories (e.g., unemployed over a certain age, or Persons with disabilities if war injuries apply).

3.4 Enhancing capacity of main stakeholders

Montenegro has made progress in promoting employment of persons with disabilities, but significant institutional capacity gaps persist across key stakeholders.

Limited capacity of the Public Employment Service. The Employment Agency of Montenegro (EAM) faces constraints in staffing, expertise, and service delivery, limiting its ability to provide tailored support. Capacity gaps are particularly pronounced in less developed regions, where local offices lack specialized expertise to support vulnerable groups. EU assessments have consistently highlighted the need to strengthen EAM as a modern public employment service ⁵¹.

Insufficient training and specialized expertise. Many frontline staff, including employment counsellors and rehabilitation providers, lack adequate training in disability inclusion. This affects the quality of counselling, activation, and rehabilitation services. The need for external programmes to strengthen institutional skills highlights structural capacity limitations within mainstream services⁵².

Weak engagement and capacity of employers. Despite financial incentives, many employers continue to opt for quota payments rather than hiring persons with disabilities, reflecting persistent stigma and limited awareness of accommodation measures. Employer engagement remains largely incentive-driven, with insufficient systematic efforts to build employer capacity, particularly among small and medium-sized enterprises.

Underdeveloped supported employment and rehabilitation services. Public spending has focused primarily on wage subsidies, while individualized support measures — such as job coaching, supported employment, and tailored training — remain limited. The absence of a comprehensive supported employment system reduces the sustainability of labour market integration.

Weak oversight and institutional coordination. Monitoring and control mechanisms for subsidy use and disability certification have been insufficient. Irregular certification patterns and limited enforcement capacity point to weaknesses in inspection, quality assurance, and inter-institutional coordination. Coordination between ministries and implementing bodies remains fragmented⁵³.

Human resource and institutional capacity constraints. Relevant departments within the Ministry of Labour and other institutions operate with limited staffing and analytical capacity. Specialized expertise within EAM and rehabilitation services is also limited, and multidisciplinary cooperation remains underdeveloped.

⁵¹ European Commission, Montenegro 2024 Report: Communication from the Commission to the European Parliament, The Council, The European Economic and Social committee and the Committee of Regions, [online]. Last accessed 14 August 2025 at: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52024SC0694#:~:text=As%20concerns%20employment%20policy%2C%20the.at%20the%20end%20of%202023>.

⁵² UNDP in Montenegro, Accelerating Disability Inclusion, Accessed: 15 August 2025, Available at: <https://www.undp.org/montenegro/projects/accelerating-disability-inclusion#:~:text=,services%20to%20support%20activation%2C%20independent>.

⁵³ European Commission, Montenegro 2024 Report: Communication from the Commission to the European Parliament, The Council, The European Economic and Social committee and the Committee of Regions, [online]. Last accessed 14 August 2025 at: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52024SC0694#:~:text=As%20concerns%20employment%20policy%2C%20the.at%20the%20end%20of%202023>.

Emerging reforms and capacity development efforts. Ongoing reforms aim to address these challenges. These include strengthening EAM capacity through EU-supported initiatives, improving oversight of subsidy schemes, and introducing stricter regulations to prevent misuse. By early 2025, the government signalled that it would maintain wage subsidies but accompany them with stricter rules to prevent misuse⁵⁴. Digitalization and modernization efforts are expected to improve service delivery and monitoring. There is also a growing emphasis on strengthening employer engagement, including involving employers' organizations in policy development. The inclusion of the Montenegrin Employers' Federation in the Law Working Group in 2025 is one example, ensuring employers' perspectives and commitments are part of policy solutions⁵⁵. Additionally, some employers have participated in projects funded by the Fund or EU grants where they provide on-the-job training to Persons with disabilities with wage costs co-funded. These efforts, albeit modest, are steps toward better cooperation. These measures aim to shift the system from reliance on financial incentives alone toward more sustainable and inclusive employment outcomes.

⁵⁴ Radio Free Europe, Authorities Warn of Abuse of Wage Subsidies for Persons with Disabilities in Montenegro, 2025, Accessed: 18 August 2025, Available at: <https://www.slobodnaevropa.org/a/crna-gora-subvencije-osobe-s-invaliditetom/33449969.html>.

⁵⁵ Government of Montenegro, Agreement Reached on New Draft Law on Professional Rehabilitation and Employment of Persons with Disabilities, 2025, Accessed: 14 August 2025, Available at: <https://www.gov.me/en/article/agreement-reached-on-new-draft-law-on-professional-rehabilitation-and-employment-of-Persons-with-disabilities>.

4 POLICIES SUPPORTING DEMAND FOR EMPLOYMENT OF PERSONS WITH DISABILITIES

4.1 Quota system and wage subsidies

Montenegro's Law on Professional Rehabilitation and Employment of Persons with Disabilities establishes a **quota system** to stimulate demand for workers with disabilities. Employers with 20–50 employees must hire at least one person with a disability, and those with over 50 employees must ensure at least 5% of their workforce are persons with disabilities. New businesses are exempt from this obligation for their first two years of operation. The law also provides weighting for severe disabilities: hiring an employee with ≥80% disability counts as employing two persons for quota purposes. Employers who fail to meet the quota must pay a special contribution (penalty) into the national disability employment fund. Companies with more than 20 employees pay 20% of the average wage in Montenegro for each required position not filled by a person with a disability. Even smaller employers (10–19 workers), though not obliged to hire, contribute 5% of the average wage as a solidarity payment into the fund⁵⁶. These contributions thus supply the Fund for Professional Rehabilitation and Employment of persons with disabilities, intended to finance programs for disability employment. Public-sector bodies are also expected to comply with the quota, but there is a lack of monitoring on public-sector compliance.

To encourage employers to hire persons with disabilities and meet the quota requirement, Montenegro provides substantial financial incentives, primarily through wage subsidies rather than direct tax breaks. When an employer hires a person registered as a person with disability, they become eligible for a **wage subsidy from the Fund**. The subsidy level depends on the certified degree of disability:

- For an employee with at least 50% disability, the employer receives 75% of the gross salary reimbursed for the entire duration of employment⁵⁷.
- For an employee with less than 50% disability, the subsidy is 75% of the gross wage in the first year, 60% in the second year, and 50% in the third and all subsequent years. (After year 3, the state continues to co-finance half the salary indefinitely, making this a permanent subsidy)⁵⁸.

These wage subsidies dramatically reduce the labour cost for employers and serve as a strong incentive to recruit workers with disabilities.

Government data indicate a significant increase in the number of employers hiring individuals with disabilities. The number of companies receiving wage subsidies for employing disabled workers rose from 214 in 2017 to approximately 2 870 by 2025. Similarly, the total number of disabled persons employed under these programs increased from 319 to 5 544 during the same period, mostly on open-ended contracts.

Corresponding to the jump in participants, spending on wage subsidies also increased significantly. In 2018, the government paid out **€5.8 million** to employers as wage subsidies for hiring persons with disabilities. By 2025, the annual payout had reached **€40 million**. This increase reflects the rise in the number of persons with disabilities employed and the increasing wages in Montenegro.

In other words, the vast majority of the Fund's finances is dedicated to sustaining those subsidized jobs. The remaining funds for 2025 include about **€1 million for new grant projects** expected to involve 160 persons with disabilities (creating new jobs) and about **€0.93 million for professional rehabilitation services** for 550 persons with disabilities in preparation for work. This breakdown

⁵⁶ Perfectum, *Salary subsidies for employers hiring Persons with disabilities, 2024*, Accessed: 16 August 2025, Available at: <https://www.perfectum.me/en/blog/salary-subsidies-for-employers-hiring-Persons-with-disabilities/#:~:text=,the%20total%20number%20of%20employees.>

⁵⁷ Ibid.

⁵⁸ Ibid.

shows a heavy skew toward **wage subsidies** (subsidies for existing jobs) and comparatively smaller allocations for **activation and training** of jobseekers⁵⁹.

In addition to wage subsidies, the government provides **funding for workplace accommodations and support staff**, creating a more comprehensive supported employment model. Employers who hire a person with a disability can apply for grants to adapt the workplace or equipment to the employee's needs. For example, the Fund will cover the costs of adaptation for any special tools, wheelchair ramps, or assistive devices required for the job. Furthermore, the program will co-finance the salary of a personal assistant or workplace assistant for the employee with disability. This means that if a person with a disability requires a support worker, the state will pay a portion of that aide's wages. Together, the wage subsidy, accommodation grant, and assistant subsidy substantially lower the practical barriers and costs for employing persons with disabilities.

Box 1. Effectiveness of wage subsidies – what the evidence tells us

Assessing the effectiveness of wage subsidies in supporting the employment of persons with disabilities is not straightforward. A 2024 systematic review of 71 studies on employer-focused disability employment interventions reached a cautious conclusion: the evidence on wage subsidies is mixed. Some schemes improve employment outcomes, but results vary across countries and according to programme design (Derbyshire, 2024). Drawing firm conclusions is further complicated by the wide diversity of wage-subsidy schemes. Subsidies may take the form of a lump sum or a percentage of wages, usually subject to a ceiling. Their duration also varies considerably, ranging from a few weeks to several years, often combined with periodic reassessment. Objectives differ as well. Some schemes are designed to offset specific additional costs related to employing persons with disabilities, such as workplace accommodation, training or reduced productivity, while others pursue broader employment goals. In addition, schemes may target different groups or differentiate levels of support, for example for new labour market entrants, young or older persons, or persons with more severe disabilities. Any assessment of wage subsidies should take into account both their potential benefits and their possible drawbacks. Some studies point to positive inclusion effects, showing significantly higher employment rates among participants than among non-participants. At the same time, several risks are associated with this instrument. These include deadweight effects, where a significant share of supported individuals would likely have been hired even without the subsidy; substitution effects, where employers hire a subsidised person with disabilities instead of an unsubsidised worker, thereby shifting rather than reducing unemployment; displacement effects, where subsidised firms gain a competitive advantage over unsubsidised firms; and lock-in effects, where beneficiaries remain in subsidised jobs and reduce their transition to non-subsidised employment. Evidence and policy guidance suggest that the effectiveness of wage subsidies depends heavily on the safeguards built into their design. Particularly important are measures to reduce deadweight and displacement. These include rules excluding subsidies for workers who were recently employed by the same firm; requirements, where feasible, for employers to demonstrate net employment growth or at least the absence of displacement; retention obligations after the subsidy ends, sometimes combined with clawback provisions if the termination of the employment relationship is unjustified; and limits on repeated use of subsidies for the same job or employer over a defined period. Such safeguards can help ensure that subsidies support genuine job creation and sustainable inclusion rather than subsidising employment that would have occurred anyway. In most cases the wage subsidies are temporary. Some schemes envisage the permanent wage subsidies, but usually it applies only to the persons with very severe work limitations. For example, in Denmark, flexjob is the main scheme for people whose work capacity is permanently and substantially reduced and who cannot obtain or keep employment on ordinary terms after other options have been exhausted. A municipality may approve a flexjob for a person below state pension age, and the job is then adapted to the individual's reduced capacity in terms of tasks, hours or pace. Under the current model, the employer pays wages for the work actually performed, while the municipality pays a flex wage supplement to the employee; in 2026 this supplement can amount to up to DKK 21 600 per month, reduced as earnings increase. For people who entered flexjob after 2012 and are under 40, the arrangement is generally granted for five years at a time, with a municipal reassessment after 4.5 years to determine continued eligibility; those aged 40 or above may obtain a permanent flexjob after their first flexjob if they still meet the conditions. In addition, the municipality conducts a follow-up interview every 2.5 years during the flexjob period. (borger.dk) The evidence also suggests that financial incentives

⁵⁹ Ibid.

alone are often insufficient to overcome employer concerns, discrimination or perceived hiring risks. For this reason, wage subsidies tend to be more effective when combined with supported employment measures, such as job coaching, on-the-job support and employer guidance, particularly during the first months of employment. Similarly, wage subsidies should be linked to, rather than substituted for, workplace accommodation measures. Where accommodation funding exists separately, it should be used to cover one-off adjustment costs, so that wage subsidies are not used as a crude proxy for adaptations or support services. It should also be noted that wage subsidy programmes are often relatively costly compared with other labour market measures. Extensive use of this instrument may therefore reduce the total number of persons with disabilities who can be supported. For this reason, wage subsidies should be assessed within the broader policy mix of employment support measures (OECD, 2022). The OECD also notes that such schemes may encourage a focus on those who are easier to place in employment, as this reduces the actual cost and risk for employers (OECD, 2022). Overall, the available evidence suggests that wage subsidies can be effective in some contexts, but their results depend strongly on design, targeting and implementation. They are most promising when they are well targeted, include safeguards against deadweight and displacement, and are combined with supported employment and workplace accommodation measures rather than used as a standalone instrument. Analysis of international experiences can provide valuable insight for better understanding how wage subsidies work and how specific design can affect its effectiveness and efficiency. However, caution is advised in adopting the lessons learned from international experiences, with special consideration for the specific national context and situation. Regarding the Montenegrin context, it is highly recommended that a detailed analysis of this specific instrument be conducted, including cost and benefit analysis as well as rigorous impact evaluation.

Additionally, a **major reduction in social insurance contributions** (pension/disability) took effect in late 2024 – cutting employer contribution rates to 0% for all employees. This general tax change was not specific to workers with disabilities, although it has reduced labour costs overall⁶⁰.

Another measure under the law is support for **self-employment and entrepreneurship** among persons with disabilities. The Fund can grant interest-free loans on favourable terms to persons with disabilities to start a business, purchase equipment, or become self-employed. These loans come with a one-year grace period, giving new entrepreneurs time to establish their operations.

4.2 Direct Financing Instruments: Grants, Loans, and Self-Employment Support

Beyond individual wage subsidies, Montenegro deploys direct financing instruments to stimulate job opportunities for persons with disabilities, including support for employers, entrepreneurship, and social enterprises. One key instrument is the **grant scheme for inclusive employment projects**. Through periodic public calls, the EAM/Fund awards grants to projects (often run by NGOs or employer consortia) that create jobs for persons with disabilities. For example, in mid-2025, the EAM/Fund signed contracts for 10 new grant-funded projects expected to hire over 80 persons with disabilities across Montenegro. These projects will directly employ 56 persons with disabilities during implementation and secure employment for an additional 26 individuals after project completion (for at least 9 months, and ideally on open-ended contracts). The grant program stresses long-term integration, ensuring that participants transition to sustained jobs in the open labour market.

The Fund also supports **self-employment and entrepreneurship** for persons with disabilities. One avenue has been providing loans on favourable terms (with grace periods) to persons with disabilities to start their own businesses⁶¹. In addition, persons with disabilities can access mainstream self-

⁶⁰ The Union of the Blind of Montenegro (2021), *Benefits of employing Persons with disabilities in Montenegro*, [online]. Last accessed 17 August 2025 at: <https://ss-cg.org/?p=1306#:~:text=cg,zakonskim%20rje%C5%A1enijima%20u%20regionu%20C.>

⁶¹ European Blind Union, Article 27 of the CRPD-Montenegro, [online]. Last accessed 17 August 2025 at: <https://www.euroblind.org/convention/article-27/montenegro#:~:text=Self%20Employment.>

employment grant schemes. Montenegro's National Employment Strategy (2021–2025) identified entrepreneurship as a route for inclusion, and the EAM has run start-up grant programs (e.g., for all unemployed) from which persons with disabilities can equally benefit. Although not exclusive to persons with disabilities, these universal start-up grants contribute to demand by enabling persons with disabilities to create their own employment or even become employers.

Montenegrin law also recognizes “**special employment organizations**” (sheltered/workshop enterprises) that exclusively employ persons with disabilities. These organizations can receive co-financing from the Fund⁶². However, NGO representatives point out that this model, as currently defined, is outdated and not truly operational ultimately, no modern supported enterprise scheme is active, and reliance on such segregated employment is discouraged. The policy focus has thus remained on incentivising open-market employment through the quota-and-subsidy system and targeted grants.

EAM historically struggled to deploy all the funds at its disposal for persons with disabilities. For years, the Fund accumulated unspent money while unemployment among persons with disabilities remained high. This points to capacity constraints in project management and outreach – the Agency may not have had enough trained staff or robust procedures to solicit and implement enough quality projects to use the funds. The 2014 introduction of grant schemes was a step forward, but even then, only half of the budgeted amount was initially disbursed. While it has gradually improved (e.g., multiple calls per year now), ensuring that money translates into results remains challenging.

4.3 Accessibility, Quality, and Key Challenges

In Montenegro quota mechanism and wage subsidies are the key instruments incentivising employers for employment of persons with disabilities. The wage subsidies have numerous positive aspects. In comparison with the other countries analysed by the ETF, the level of subsidies can be considered generous. It has also significantly contributed to the employment of persons with disabilities and increasing presence of persons with disabilities in the workspace, thus promising a positive, long-term effect on changing attitude of employers and employees without disabilities as well as gradually on improving workplaces accessibility.

Despite a strong legal framework and substantial funding, there are still significant challenges. The construction of the system assumes that the level of subsidies can be unlimited. The regulation says that the subsidy can be from 50% to 75% of gross salary, depending on the level of disability, although the law places **no cap on the wage amount eligible for subsidy**. Additionally, the subsidy has no fixed time limit, representing a **perpetual entitlement** as long as the person is employed. This construction can bring the serious risks that some employers may misuse the system, officially declaring relatively high wages.

There is a lack of solid, robust and independent analysis of the actual use of the instrument. However, there are serious signals that the risk is materialising. Authorities observed that some employers may be exploiting the subsidies by **reporting artificially high salaries** for employees with disabilities in order to claim a larger reimbursement from the state⁶³. For example, in early 2025, one company declared a disabled employee's gross wage as €7 300 (several times the national average) and another at €5 600 for a low-skill position – the state then had to subsidize 75% of those inflated wages⁶⁴. Reports of irregularities – such as companies allegedly established solely to claim subsidies – have prompted investigations. In April 2024, **police charged several individuals from three companies in Bijelo Polje with fraudulent employment of persons with disabilities**. This resulted in hundreds of thousands of euros in damage caused by opportunistic firms seeking to exploit an

⁶² UNPRPD (2021), Situational analysis of the rights of Persons with disabilities in Montenegro, [online]. Last accessed 15 August 2025 at: https://unprpd.org/new/wp-content/uploads/2023/12/CR_Montenegro_2021-51b.pdf#:~:text=Between%202018,of%20Persons%20with%20disabilities%20in.

⁶³ Radio Free Europe (2025), “Authorities Warn of Abuse of Wage Subsidies for Persons with Disabilities in Montenegro”, [online]. Last accessed 18 August 2025 at: <https://www.slobodnaevropa.org/a/crna-gora-subvencije-osobe-s-invaliditetom/33449969.html>.

⁶⁴ Ibid.

apparent loophole whereby they could hire a person with disability and set an exorbitant salary, knowing the government would cover most of it⁶⁵.

The risk is amplified by the weakness of the monitoring and control system. Employment **programmes for people with disabilities face major oversight issues**. The Fund cannot verify the actual employment or wages of participants, and oversight bodies have been largely ineffective. The Council of Persons with Disabilities has not prevented abuses due to internal disputes that stalled its work until 2024. The State Audit Institution, in budget reviews from 2022–2024, warned Parliament that subsidy costs are outpacing revenue and jeopardizing rehabilitation services.

Of course, isolated cases of fraud cannot justify criticism of the system overall. **Nevertheless, risk analysis and the identification of actual frauds provide strong prompts that the instrument requires a solid, independent analysis, review and possible revisions.**

The identified risk can have significant negative consequences for the support of the employment of persons with disabilities.

- It can provide incentives for artificial inflation of the number of certified persons with disabilities – some employers may push employees to apply for a disability certificate while, without the subsidies, they would not apply for such status. EAM confirmed “indicators pointing to possible irregularities” and called for stricter oversight of medical commissions certifying disabilities. Data showed that **less-developed northern municipalities (Berane, Rožaje, Bijelo Polje) were issuing disability certificates at unusually high rates** – 876 new decisions in 2024, compared to 586 in larger cities like Podgorica and Nikšić combined. Some individuals reportedly changed residence to northern municipalities to obtain certificates, then moved back, suggesting loopholes or lenient assessments. These patterns contribute to the perception that some employers and individuals may be exploiting the system, risking stigma for all participants.
- The overuse of the wage subsidies may inflate the total costs of the instrument and in fact **limits the availability of other forms of support for the employment for persons with disabilities**. Data presented above clearly shows that in 2025, wage subsidies consumed around 95% of the total budget for supporting employment of persons with disabilities, with very limited resources remaining for vocational rehabilitation or support for employability of persons with disabilities. The growing costs of wage subsidies are subsidized from the state budget, thus limiting the possibility for increasing the budget for other instruments. **As a result, many persons with disabilities, requiring others forms of the support, risk being effectively excluded from the labour market.**

From the **accessibility and quality** standpoint, for genuine beneficiaries there are other gaps. Many persons with disabilities and their advocates report that **workplaces and processes are not fully accessible** – e.g., physical inaccessibility of workplaces or lack of adaptive equipment despite the available grants. Implementation of **reasonable accommodations** at work is inconsistent: Montenegrin law requires it, but in practice, employers often think only in terms of physical adjustments and overlook measures like flexible work hours, assistive technology, or modified duties⁶⁶. The **professional rehabilitation services** (training, counselling) offered via the EAM have been criticized as **outdated and under-resourced**⁶⁷. The UNDP noted that significant funds exist in

⁶⁵ Vijesti, *Disputable disabilities are ravaging the state budget*, 2024, Accessed: 13 August 2025, Available at:

<https://en.vijesti.me/vijesti/ekonomija/720207/sporni-invaliditeti-pustose-drzavni-budzet#:~:text=In%202022%2C%20a%20total%20of,amount%20by%20another%20ten%20million.>

⁶⁶ Gradski portal (2025), Marina Vujačić-UMHCG, *The law should guarantee equal opportunities and dignity for persons with disabilities in the labour market*, [online]. Last accessed 20 August 2025 at: <https://gradski.me/umhcg-zakon-da-garantuje-jednake-sanse-i-dostojanstvo-za-osi-na-trzistu-rada/#:~:text=Govore%C4%87i%20o%20zna%C4%8Daju%20razumnih%20adaptacija%2C,svode%20isklju%C4%8Divo%20na%20fizi%C4%8Dku%20pristupa%C4%8Dnost.>

⁶⁷ European Commission, Montenegro 2024 Report: Communication from the Commission to the European Parliament, The Council, The European Economic and Social committee and the Committee of Regions, [online]. Last accessed 14 August 2025 at: [Montenegro 2024 Report](#).

the system, but with *limited impact on actually improving the employability* of persons with disabilities⁶⁸. For example, there is no comprehensive supported employment program (job coaches or on-the-job support) beyond ad hoc NGO projects. As a result, some persons with severe disabilities or high support needs remain effectively excluded, as employers tend to hire those who can integrate with minimal accommodation. Moreover, **stereotypes and low awareness** among many employers persist: a 2020 survey found that nearly half of people with disabilities believed employers simply, “do not want to hire them,” due to prejudice. This underscores the importance of the information campaigns; without addressing attitudinal barriers, legal incentives alone may not ensure true workplace inclusion.

Another challenge is ensuring **fairness and dignity in employment**. The disability community stresses that having a job is not enough if persons with disabilities are confined to low-paying roles with no advancement. NGO representatives argue that little attention is given to career progression for employees with disabilities – they rarely see promotion opportunities, and some remain stuck in segregated environments or in token roles. They also note that the current system still operates on a **“functional incapacity” approach**, focusing on what a person *cannot* do (via percentage disability ratings and reduced work capability assumptions) rather than providing individualized support based on abilities. Such a philosophy can inadvertently reinforce ableist attitudes. Additionally, **women with disabilities face multiple forms of discrimination** – they benefit less from employment programs and often experience compounded bias, a gap that the current measures do not specifically address.

⁶⁸ UNPRPD (2021), Situational analysis of the rights of Persons with disabilities in Montenegro, [online]. Last accessed 15 August 2025 at: https://unprpd.org/new/wp-content/uploads/2023/12/CR_Montenegro_2021-51b.pdf#:~:text=Between%202018,of%20Persons%20with%20disabilities%20in.

5 THE LINKAGES BETWEEN EMPLOYMENT AND OTHER POLICIES AREAS

5.1 From school to the labour market

Montenegro has formally embraced inclusive education – the **Law on Education of Children with Special Educational Needs**⁶⁹ mandates that children with disabilities be included in mainstream schools as a first option⁷⁰. In practice, this policy has led to a steady increase in the number of students with disabilities attending regular schools, with specialised “resource centres” reserved only for those who cannot be adequately supported in a mainstream setting. The **Strategy of Inclusive Education 2019–2025**⁷¹ reinforces a rights-based approach aligned with the UN Convention on the Rights of Persons with Disabilities (CRPD), aiming for full and equal participation of all children in education. These legal and strategic frameworks indicate a strong commitment to equitable education. The strategy explicitly mandates “Effective Transitions” from school into vocational/tertiary education and work. Under this policy, mainstream schools and special resource centers provide *individual development plans* and support services so that youth with disabilities can acquire vocational qualifications alongside peers. Although no standalone national “school-to-work” program exists, government-funded vocational programs and dual-education pilots are increasingly opening to disabled learners.

For example, vocational schools and the national **Center for Vocational Education** adopt curricula and facilities for students with special needs, and EAM often sponsors **adult education and qualification courses** for unemployed persons with disabilities. Funds from the Rehabilitation Fund cover tuition and training costs for disabled jobseekers in certified courses (e.g., computer skills, hospitality, crafts) under active-policy measures. Likewise, the government’s recent “**dual education**” **pilots**, in cooperation with businesses, aim to include vulnerable youth in on-the-job training. Career guidance desks in schools and a planned youth career platform further assist transitions.

Despite these commitments, significant gaps in the education system continue to hinder the transition of youth with disabilities from school to work. Physical accessibility of educational institutions remains limited. As of 2021, when the last available data was published, only about 9% of primary and 6% of secondary schools were fully accessible to students with disabilities. Many school buildings and transportation options still lack ramps, elevators, or other accommodations. Furthermore, accessible learning materials and support services are insufficient. Students with visual impairments, for example, struggle with a dearth of Braille textbooks and adapted materials, often having to rely on parents or teachers to transcribe content⁷². At the university level, virtually no literature is available in Braille or alternative formats, significantly impeding the higher education of blind and low vision students. While Montenegro ratified the Marrakesh Treaty⁷³ to facilitate access to published works for the blind, current students continue to face these barriers⁷⁴.

⁶⁹ The Law on Education of Children with Special Educational Needs (2021), [online]. Last accessed 23 August 2025 at: <https://www.gov.me/en/documents/a9b62307-e802-40ec-9fa0-be4276b9623e>.

⁷⁰ Eurydice (2024), Educational support and guidance - Montenegro, [online]. Last accessed 23 August 2025 at: <https://eurydice.eacea.ec.europa.eu/eurydice/montenegro/educational-support-and-guidance#:~:text=Montenegroin%20education%20system%20has%20set,between%20education%2C%20habilitation%20and%20rehabilitation>.

⁷¹ Ministry of Education of Montenegro, The Strategy for Inclusive Education 2019–2025, [online]. Last accessed 01 August 2025 at: <https://www.gov.me/dokumenta/fbeec964-7c59-4b5a-a54e-8417281160ba>.

⁷² UNDP in Montenegro (2024), *Accessibility of education: Challenges faced by people with disabilities in the pursuit of fundamental rights*, [online]. Last accessed 24 August 2025 at: <https://www.undp.org/european-union/stories/accessibility-education-challenges-faced-people-disabilities-pursuit-fundamental-rights#:~:text=Image>.

⁷³ World Intellectual Property Organization (WIPO), *The Marrakesh Treaty to Facilitate Access to Published Works for Persons Who Are Blind, Visually Impaired, or Otherwise Print Disabled*, [online]. Last accessed 24 November 2025 at: <https://www.wipo.int/en/web/marrakesh-treaty>.

⁷⁴ Ibid.

Personal assistance in education is another critical factor. Montenegrin law provides for teaching assistants in primary and secondary schools to support students with disabilities. However, there are shortages of these assistants, and their training is often inadequate. Notably, no legal provision exists for assistants in higher education, meaning young persons with disabilities often lose critical support when transitioning to university⁷⁵.

No official statistics exist on dropouts among students with disabilities. According to the representatives of the NGOs for persons with disabilities that were interviewed, students with disabilities commonly opt for secondary vocational schooling over academic paths due to limited support and accommodations in mainstream high schools and universities, which narrows their future career options. In practical terms, this means that persons with disabilities attain significantly lower education levels on average than their peers without disabilities (though comprehensive data are lacking, the trend is evident from enrollment patterns)⁷⁶. Lower educational attainment, in turn, translates into a weaker position in the labour market.

Montenegro has introduced measures to support the school-to-work transition for youth with disabilities. Career guidance is available to all students through school-based counsellors and the national **Lifelong Career Guidance Strategy 2025-2030**, which is intended to cover everyone regardless of ability⁷⁷. However, career counselling in schools often lacks the capacity to address the specific needs and potential of students with disabilities. Targeted programmes to help young people with disabilities move from education into employment are rare, and the Employment Agency's internship and training schemes for unemployed graduates – including those with disabilities – remain limited in scope.

Consequently, **young people with disabilities face a challenging leap from school to the labour market**, contributing to extremely high unemployment rates among this group. The cumulative impact of educational barriers – such as inadequate physical accessibility, limited assistive technology and learning materials, insufficient support like teaching assistants across all levels, and persistent stigma or low expectations – excludes many from employment. Addressing these issues would greatly improve the prospects of youth with disabilities as they enter the workforce.

5.2 Skills development opportunities

Effective employment integration for persons with disabilities also depends on opportunities for **skills development in adulthood**. This includes access to vocational training, adult education programs, and career guidance services beyond formal schooling. In Montenegro, persons with disabilities have a legal right to mainstream vocational training and adult education on an equal basis, but the practical availability and accessibility of such opportunities are limited⁷⁸. The country's compliance with the right to vocational training for all (as monitored by the European Social Charter) has been deemed insufficient – it has “not been established” that people with disabilities can effectively exercise their right to training and retraining under equal conditions⁷⁹. In other words, while no law forbids persons with disabilities from attending any adult education course, tailored support to enable their participation is often missing.

General adult education frameworks in Montenegro, such as the **Adult Education Plan** and lifelong learning policies, espouse principles of accessibility and equal opportunity⁸⁰. In practice, however, **few adult learning centers offer adapted courses or materials for persons with disabilities**. For

⁷⁵ Ibid.

⁷⁶ Friends of Europe (2022), *The vision for a quality, inclusive education system in Montenegro*, [online]. Last accessed 24 August 2025 at: <https://www.friendsofeurope.org/insights/the-vision-for-a-quality-inclusive-education-system-in-montenegro/#:~:text=School%20enrolment%20and%20attendance%20is,is%20almost%20ten%20times%20lower.>

⁷⁷ Ministry of Education, Science and Innovation of Montenegro, *Lifelong Career Guidance Strategy 2025-2030*, [online]. Last accessed 15 August 2025 at: <https://www.gov.me/dokumenta/c5343fcc-2a27-49ea-9a91-6c117b009076>.

⁷⁸ Council of Europe (2024), *Montenegro and the European Social Charter*, [online]. Last accessed 25 August 2025 at: <https://rm.coe.int/montenegro-april2024-en-2773-4635-2649-1/1680afc702#:~:text=workers%3B%20,other%20contracting%20parties%20is%20not.>

⁷⁹ Ibid.

⁸⁰ Ibid.

instance, representatives of NGOs for persons with disabilities claim that some vocational training centers may not have sign language interpreters for deaf trainees or accessible equipment for those with physical impairments. Some positive developments include NGOs or donor-supported projects that provide IT training or language courses for persons with disabilities, and the establishment of centers like “ZOPT” (Centre for Employment and Education of Adults), which work on adult training and professional rehabilitation. Still, these efforts are nascent. Career guidance for adults with disabilities is largely delivered through the mainstream employment services. Counsellors at local employment bureaus are responsible for helping unemployed persons with disabilities with career planning. While the intention is inclusive, the capacity of employment counsellors to adequately support clients with disabilities is often low, and specialised guidance is scarce.

A conspicuous gap is the lack of comprehensive re-training programs for adults who acquire disabilities in mid-career. If a worker has been deemed disabled (for example, through injury or illness) and can no longer perform their previous job, the system of professional rehabilitation should ideally provide support for retraining into a new role. Montenegro’s current system does have a formal process for assessing remaining work capacity and rights to rehabilitation, but the availability of quality retraining options is limited.

The National Rehabilitation Centre of Montenegro⁸¹ is the country’s leading institution for physical medicine and rehabilitation, serving some 19 000 beneficiaries annually with a capacity of 1 800 beds. A large proportion of its users are persons with disabilities, including those with neurological, orthopaedic, rheumatological, and developmental conditions. The Centre provides comprehensive, multidisciplinary rehabilitation programmes combining medical treatment, physical therapy, psychosocial support, and occupational training to improve functional independence and social participation. Through these services, the Centre significantly contributes to reducing long-term disability, improving quality of life, and promoting inclusion of persons with disabilities in education, employment, and community life.

5.3 How social benefits support employment of persons with disabilities

Montenegro provides a range of **social benefits, pensions, and allowances** to persons with disabilities, which, while essential for income security, can have complex effects on their motivation and ability to seek employment. The design of these benefits, particularly whether they are compatible with earned income, can either encourage persons with disabilities to participate in the labour market or inadvertently create a so-called “*pension trap*.” In Montenegro, the main disability-related benefits include:

- **Disability pensions** under the social insurance system (for individuals assessed as having permanent work incapacity, usually with sufficient contributions). These are long-term payments similar to early retirement for disability.
- **Personal Disability Allowance**, a monthly cash benefit meant to support persons with disabilities for additional living costs. As of 2025, this allowance was approximately €319 per month. This allowance is provided under the social welfare system and is typically granted based on the degree of disability, regardless of past employment⁸².

⁸¹ National Rehabilitation Centre of Montenegro, Website, [online]. Last accessed 19 October 2025 at: <https://igalospa.com/>.

⁸² Data on **Unemployment benefits and legacy acquired rights**. Under the current Law on Mediation in Employment and Rights during Unemployment, persons with disabilities are treated equally with other unemployed persons regarding unemployment benefits; the former open-ended entitlement for persons with disabilities has been abolished. However, transitional provisions protect acquired rights: persons with disabilities and other unemployed persons who obtained this right under previous legislation continue to receive it in the same scope, duration and amount. As a result, some legacy beneficiaries still receive continued payments, including benefits previously linked to disability or work-disability status, but these no longer constitute a current general entitlement for newly unemployed persons with disabilities, obtained from the Ministry of Social Welfare, Family Care and Demography.

- **Allowance for Care and Assistance** (often called the attendance allowance), given to persons with disabilities who require help from another person to perform daily activities. This is intended to support those with severe disabilities (or their families) in covering the costs of personal care.
- **Unemployment benefits and legacy acquired rights.** Under the current Law on Mediation in Employment and Rights during Unemployment, persons with disabilities are treated equally with other unemployed persons regarding unemployment benefits; the former open-ended entitlement for persons with disabilities has been abolished. However, transitional provisions protect acquired rights. Thus, persons with disabilities and other unemployed persons who obtained this right under previous legislation continue to receive it in the same scope, duration and amount, equal to 40% of the minimum wage indefinitely. However, in practice, **roughly €240 per month (for lower-skilled individuals) or €320 per month (for those with higher education), plus pension and health insurance contributions, are paid until retirement age.** As a result, some legacy beneficiaries still receive continued payments, including benefits previously linked to disability or work-disability status, but these no longer constitute a current general entitlement for newly unemployed persons with disabilities.

Personal disability allowance and care and assistance allowance are not fiscal or labour-market policy tools. Instead, they are fundamental rights for people with disabilities. These benefits are designed to help cover extra living expenses and guarantee a decent standard of living. They should not be tied to employment status in such way that people with disabilities are discouraged from working due to the risk of losing their benefits.

Unemployment benefits are linked to the risk of the unemployment and after the change of the construction, their disincentivising characteristics disappear. However, disability pensions typically cannot be received concurrently with a full-time salary. Regulations often stipulate that if a person is deemed capable of work (even part-time), they may lose entitlement to a disability pension or have it significantly reduced. This creates fear that attempting employment (even if health permits some work) could lead to a permanent loss of pension status. Therefore, there is a need to search for solutions that will ensure income security for persons with disability assuming the characteristics of a “benefit trap”.

Another angle is the interaction between personal allowances and employment. The Personal Disability Allowance is granted based on disability status. In theory, this benefit could be retained even if a person works, since it compensates for disability-related needs. However, many recipients may not be aware of this or fear bureaucratic reassessment if they start working. Likewise, the allowance for care and assistance is tied to the need for a career, not income, so it could accompany employment. Nonetheless, families often worry that showing any increased capacity (like working) might trigger a review of their disability status or benefits. These psychological and administrative barriers add to the “trap”. The net effect is that many persons with disabilities remain economically inactive to safeguard their benefits, especially if available jobs are low-paying or temporary.

5.4 Access to social services

In Montenegro, the availability of community-based services for persons with disabilities has shown a degree of progress in recent years. However, it falls short of fully responding to existing needs. Certain services, such as personal assistance and home care, are delivered by licensed service providers and are available throughout the territory of Montenegro. Despite these developments, the overall scope, accessibility, and coverage of community-based services remain limited. In particular, supported living services have not yet been established, while other services, including day care centres, are not sufficiently developed and fail to ensure adequate and equitable access for all persons in need. Instead, the system has historically relied more on institutional care and informal family care. This imbalance has direct consequences for the labour market, for, when Persons with disabilities lack support to live and work independently, they and, often, their caregivers, are excluded from employment.

One notable development has been the expansion of **day care centres for children and young people with developmental disabilities**. As of 2025, Montenegro has around 17-day care centres across the country, serving over 400 children and youth with intellectual or developmental difficulties⁸³. These centres, operated by local authorities with support from the Ministry of Social Welfare, Family Care and Demography, provide *free eight-hour care, therapy, and educational activities* to participants. They effectively offer a safe space for children to learn skills and receive rehabilitation services (speech therapy, physiotherapy, special education, etc.), while their parents or guardians have respite during the workday⁸⁴. By preventing the institutionalisation of children and keeping them in their communities, day care services also ensure that parents are not forced to quit jobs simply to provide constant care. *“Children remain with their loved ones... and in a safe environment with professional assistance, they learn daily life skills and build self-confidence,”* which benefits the whole family⁸⁵.

Despite these positive examples, there are clear **gaps in social service provision** that hinder full labour market participation of persons with disabilities. Day care services in Montenegro have traditionally been oriented primarily towards children and young persons with developmental disabilities. However, the system has evolved to include services for adults and older persons. Currently, there are 24 licensed service providers delivering day care services for adults and older persons, including adults and older persons with disabilities, as well as those who, due to specific circumstances and social risks, require an appropriate form of social protection. As of 31 December 2025, this number stood at 22 licensed providers, indicating a moderate increase in service provision capacity. In addition, the home care service has been further developed, with 14 licensed providers currently delivering assistance in the home environment⁸⁶. Despite these improvements, structured and comprehensive programmes tailored specifically to adults with disabilities are still not fully adequate, and existing services do not yet fully ensure proper coverage and continuity of support across all regions. This leaves many working-age adults, especially those with significant support needs, without daytime programs or supervised activities. Personal assistance services are thus crucial for them. Having a trained assistant help with tasks of daily living or accompany them at work could make the difference between being employable or not. However, Montenegro’s personal assistance service is still in a nascent stage. According to the UNPRPD analysis, in a recent four-year period, the government spent over **€20 million** on building or maintaining residential institutions for adults with disabilities and the elderly, yet only about **€61 000** on expanding personal assistance services in the community⁸⁷. This stark disparity illustrates that institutional care is still heavily financed, whereas community-based supports like personal assistants receive minimal investment⁸⁸. As a result, many persons with disabilities who could live independently with some support instead either depend entirely on family (limiting both the person’s and the caregiver’s ability to work) or end up in residential care facilities. Informal caregivers, often female family members, face difficulties entering or remaining in the labour market due to the lack of outside support for the person they care for. In essence, insufficient social services create a ripple effect of labour market exclusion – affecting individuals with disabilities and their families.

Another area of social services linked to employment is **rehabilitation and training services**. Effective vocational rehabilitation is needed to prepare persons with disabilities for work. Montenegro does offer some rehabilitation programs (funded through the Fund and delivered by certain centres or through projects), but coverage is patchy. For instance, if a person with a disability wants to improve specific work-related skills or get assistive technology to perform a job, these services may not be readily accessible or may involve long waiting times and centralized locations. Additionally, **supported**

⁸³ UNICEF in Montenegro (2025), Day care centres for children with developmental disabilities: A key support for families, [online]. Last accessed 16 August 2025 at: <https://www.unicef.org/montenegro/en/stories/day-care-centres-children-developmental-disabilities-key-support-families#:~:text=More%20than%20400%20children%20and,at%20developing%20each%20child%E2%80%99s%20potential.>

⁸⁴ Ibid.

⁸⁵ Ibid.

⁸⁶ Data obtained from the Ministry of Social Welfare, Family care and Demography

⁸⁷ UNPRPD (2021), *Situational analysis of the rights of Persons with Disabilities in Montenegro*, [online]. Last accessed 15 August 2025 at: https://unprpd.org/new/wp-content/uploads/2023/12/CR_Montenegro_2021-51b.pdf#:~:text=Between%202018,of%20Persons%20with%20disabilities%20in.

⁸⁸ Ibid.

employment services, where job coaches or specialized agencies help match and support persons with disabilities in workplaces, are not yet systematized in Montenegro. Some NGOs provide limited supported employment or sheltered workshops, but these reach only a fraction of those interested in work.

A critical social service for enabling employment is also **transportation** for persons with disabilities, a factor that intertwines with both accessibility and social support. If accessible transport (such as wheelchair-friendly buses or transport vouchers for those unable to use public transit) is lacking, attending work or training becomes a major challenge. In Montenegro's municipalities, accessible transport options are very limited, effectively acting as another barrier for jobseekers with disabilities.

5.5 Accessibility

Montenegro, having ratified the CRPD, is committed to improving accessibility across these dimensions⁸⁹. Despite policy initiatives and some progress, persons with disabilities, *“still face daily barriers in accessing basic rights such as education, employment, social protection, and legal equality,”* in large part due to accessibility shortcomings⁹⁰. Key national efforts and challenges in this area are outlined below.

Legal and strategic framework: Montenegro does not have a single comprehensive “Accessibility Law,” however, accessibility provisions are embedded in various laws and regulations. The **Law on Spatial Planning and Construction**⁹¹ requires that all new public buildings be constructed in compliance with accessibility standards⁹². Lately, Montenegro has significantly reduced illegal construction and improved building permitting processes to include accessibility compliance⁹³. Alongside construction codes, the **Law on Prohibition of Discrimination against Persons with Disabilities** enshrines accessibility as a right. The law nevertheless *fails to explicitly recognize the denial of reasonable accommodation as a form of discrimination*. In other words, if an employer or service provider fails to provide a necessary accommodation, the individual currently has limited legal options to appeal. The absence of a clear obligation for reasonable accommodation in employment is inconsistent with CRPD standards and is an area flagged for reform.

Public services and information accessibility: The government has undertaken some initiatives to improve access to public services. For instance, there have been targeted *Action Plans to retrofit public buildings* – a past action plan focused on adapting 13 public-use facilities for access by persons with reduced mobility. Additionally, some ministries have made efforts to accommodate persons with sensory disabilities. The Ministry of Finance trained some staff in sign language, while it should be noted that **Montenegrin Sign Language is not yet recognized as an official language** by law. The lack of official status for sign language means that the deaf community's communication needs may be overlooked in public services. Another facet is the obligation under the Law on Free Access to Information⁹⁴ that information should be provided in formats accessible to persons with disabilities. Compliance here is low – in a survey of institutions, only 6 out of 46 entities provided the requested information in audio format for blind individuals, despite the legal requirement to do so⁹⁵.

⁸⁹ UNDP in Montenegro (2024), *Accessibility of education: Challenges faced by people with disabilities in the pursuit of fundamental rights*, [online]. Last accessed 16 August 2025 at: <https://www.undp.org/european-union/stories/accessibility-education-challenges-faced-people-disabilities-pursuit-fundamental-rights#:~:text=Montenegro%20ratified%20the%20UN%20Convention,prevent%20discrimination%20based%20on%20disability.>

⁹⁰ Ibid.

⁹¹ The Law on Spatial Planning and Construction (2019), [online]. Last accessed 20 August 2025 at: <https://www.gov.me/dokumenta/1603a1b7-1090-4e00-b7fd-e5e97607f030>.

⁹² World Bank, *Serving the Underserved with Greater Accessibility in Montenegro*, [online]. Last accessed 21 August 2025 at: <https://www.worldbank.org/en/news/feature/2014/11/19/serving-the-underserved-with-greater-accessibility-in-montenegro#:~:text=Increasingly%20concerned%20by%20this%2C%20Dejan,LAMP.>

⁹³ Ibid.

⁹⁴ The Law on Free Access to Information (2017), [online]. Last accessed 20 August 2025 at: <https://www.gov.me/dokumenta/6400794e-c941-45bf-a1a1-9b26a6dd9602>.

⁹⁵ UNDP in Montenegro (2024), *Accessibility of education: Challenges faced by people with disabilities in the pursuit of fundamental rights*, [online]. Last accessed 16 August 2025 at: [Accessibility of education: Challenges faced by people with disabilities in the pursuit of fundamental rights](https://www.undp.org/european-union/stories/accessibility-education-challenges-faced-people-disabilities-pursuit-fundamental-rights#:~:text=Montenegro%20ratified%20the%20UN%20Convention,prevent%20discrimination%20based%20on%20disability.).

Workplace accessibility and accommodations: Ensuring that workplaces are accessible and that employers provide necessary accommodations is crucial for employment inclusion. Montenegro's current policy approach to this has been through a combination of mandates and incentives. The Law on Professional Rehabilitation and Employment of persons with disabilities is expected to strengthen requirements for employers to create accessible workplaces and perhaps clarify the duty to accommodate. In practice, larger new office buildings may have basic physical accessibility features embedded within the building code. However, many workplaces are in older buildings with stairs and no elevators, posing physical barriers. There are incentives available: employers who hire persons with disabilities can obtain subsidies for workplace adaptation from the Fund. Yet, until the legal obligation for reasonable accommodation is made explicit and enforceable, many needed adjustments may continue to be regarded as optional⁹⁶. The planned reforms and EU integration process press for a shift to a **rights-based approach**, meaning accessibility and accommodations should be seen as rights rather than special favours.

Public awareness and enforcement. To ensure accessibility laws must not only be sound, but they must also be implemented. Montenegro has had instances of nominal compliance (e.g., a ramp added to a building but too steep to use, or a website with an “accessibility” page that does not function properly). Without strong coordination and monitoring, accessibility often relies on advocacy by NGOs and individuals. Meanwhile, the actions of persons with disabilities NGOs are encouraging, and persons with disabilities have joined working groups to monitor construction and ensure that new buildings meet standards. Such involvement has proven effective at the local level and should be emulated broadly. Public awareness campaigns have also been undertaken, sometimes in collaboration with the OSCE and EU, highlighting that accessibility benefits everyone and is a hallmark of a modern, inclusive society.

⁹⁶ Council of Europe (2024), Montenegro and the European Social Charter, [online]. Last accessed 25 August 2025 at: <https://rm.coe.int/montenegro-april2024-en-2773-4635-2649-1/1680afc702#:~:text=workers%3B%20,other%20contracting%20parties%20is%20not.>

6 THE GENDER DIMENSION OF POLICIES SUPPORTING EMPLOYMENT OF PERSONS WITH DISABILITIES

6.1 Differences between men and women with disabilities in the labour market

Labour Force Participation and Unemployment: According to recent data, women comprise the majority of jobseekers with disabilities. For example, at the end of 2020, there were 10 970 registered unemployed persons with disabilities, **60.5% of whom were women**⁹⁷. This imbalance persisted through the post-pandemic period. By mid-2023, about **58.7%** of all unemployed persons with disabilities were women⁹⁸, indicating that women with disabilities experience greater difficulty securing jobs, contributing to a gender employment gap within the population with disabilities. In particular, a quarter of all unemployed women in Montenegro are women with disabilities, underscoring that disability is a significant factor in female unemployment⁹⁹.

Education and Skill Level: A key difference influencing labour market outcomes is the education level of jobseekers with disabilities. Unemployed women with disabilities tend to have lower educational qualifications compared to their male peers. Over half (around **53–54%**) of all unemployed female persons with disabilities have only a primary or basic education (categorized as “first degree of professional qualification”)¹⁰⁰. This rate is far higher than for men – in fact, nearly two-thirds of unemployed people with disabilities who possess only the lowest education level are women (**65% female vs. 35% male**). This means there are almost twice as many women with disabilities with minimal education in the job market as men, a ratio that has seen no improvement since 2020. The prevalence of low qualifications among women with disabilities limits their job opportunities and contributes to their higher unemployment¹⁰¹.

Age and Duration of Unemployment: Women with disabilities also tend to be older on average by the time they find employment, reflecting longer periods out of the workforce. Data indicate that **women with disabilities are more likely than men to remain unemployed until mid-career ages (35–54)**, suggesting they enter employment later in life. Moreover, older age groups of persons with disabilities are dominated by women. Among unemployed people with disabilities over 50 years old, women substantially outnumber men. By the first half of 2023, women still made up roughly **60% of unemployed persons with disabilities above age 50**. This trend (up from about 56% in the 2016–2020 period) indicates that older women with disabilities face particular challenges leaving unemployment¹⁰². Factors such as longer-term skills gaps, compounded health issues, or age and gender bias may be contributing to these disparities.

⁹⁷ NGO Women's Rights Centre (2021), *Gender-Based Discrimination and Labour in Montenegro*, [online]. Last accessed 25 August 2025 at: https://womensrightscenter.org/wp-content/uploads/2022/04/GBD_in_Labour_in_Montenegro.pdf#:~:text=According%20to%20the%202020%20yearly,the%20state%20in%20order%20to.

⁹⁸ NGO The Initiative of Youth with Disabilities of Boka (IYDB) (2023), *Gender Responsive Budgeting in the Field of Professional Rehabilitation and Employment of Persons with disabilities*, [online]. Last accessed 25 August 2025 at: <https://gbwn.net/wp-content/uploads/2025/05/Policy-Brief-eng-210x297-3mm.pdf#:~:text=On%20June%2030%202023%2C%2024.61,more%20prevalent%20as%20a%20less.>

⁹⁹ Ibid,

¹⁰⁰ Ibid.

¹⁰¹ Ibid.

¹⁰² Ibid.

6.2 Access to Employment Services and Measures: A Gender Perspective

Women with disabilities participate in many employment support measures at high rates. For instance, since 2018, women have consistently made up over 64% of participants in the professional rehabilitation program that provides training and preparation for work, far outnumbering men. This high uptake suggests that unemployed women with disabilities are actively seeking to improve their employability.

Despite their strong participation in services, women with disabilities continue to have lower job placement rates. For example, although women accounted for 60% of all jobseekers, they represent 53% of subsidized job placements¹⁰³. This indicates that, proportionally, men with disabilities had slightly higher chances of being hired through subsidy programmes.

Despite efforts by public employment services to enhance access to labour market measures for persons with disabilities, these initiatives rarely cater to the specific needs of women with disabilities. Programmes such as vocational training, wage subsidies, and rehabilitation are broadly available but lack targeted support or quotas for women. As a result, women with disabilities continue to face barriers transitioning to employment and remain overrepresented among unemployed persons with disabilities, even after participating in these schemes.

6.3 Key Challenges and Barriers from a Gender Perspective

The evidence above reveals several **key challenges at the intersection of gender and disability** in employment, which current policies are only partially addressing:

- **Double Discrimination and Stereotypes:** Women with disabilities encounter both gender bias and disability stigma – known as “multiple and intersectional discrimination”. Employers may doubt their abilities or hesitate to hire them due to assumptions about care needs or family responsibilities. This double discrimination results in fewer job opportunities and longer periods of unemployment for women with disabilities.
- **Lower Education and Skill Levels:** women with disabilities tend to have lower formal education and skill levels, stemming from past inequalities in access to education or training. This educational gap leaves many women with disabilities less competitive in the job market and makes them overrepresented in the less skilled occupations. Without targeted interventions, such as specialised training or lifelong learning opportunities, this skills deficit remains a significant barrier to their employment.
- **Lack of Gender-Sensitive Support Measures:** Montenegro’s disability employment policies fail to recognize the unique challenges faced by women with disabilities, e.g., higher care obligations or biases in hiring. There are no dedicated incentives or programs specifically encouraging the hiring of women with disabilities, nor measures like mentorship, accessible childcare, or flexible work arrangements targeting this group. The lack of sex-disaggregated data and analysis in some employment programs also hampers the ability to tailor solutions – the need to systematically collect and use data by sex is an area for improvement.
- **Work-Family Balance and Care Responsibilities:** Many women with disabilities face caregiving responsibilities shaped by traditional gender roles, which can further constrain their employment opportunities. These challenges are particularly acute during childbearing years, when maternity leave and health-related needs may require tailored support. Current employment measures do not sufficiently account for these factors. Standard maternity provisions and general entrepreneurship

¹⁰³ NGO Women’s Rights Centre (2021), *Gender-Based Discrimination and Labour in Montenegro*, [online]. Last accessed 25 August 2025 at: https://womensrightscenter.org/wp-content/uploads/2022/04/GBD_in_Labour_in_Montenegro.pdf#:~:text=According%20to%20the%202020%20yearly,the%20state%20in%20order%20to.

programmes are often not adapted to the specific circumstances of women with disabilities. Policy recommendations calling for extended maternity leave and targeted financial support for women entrepreneurs suggest that existing frameworks leave important gaps. Without adjustments such as extended leave, accessible childcare services, or disability-sensitive self-employment grants, women with disabilities are at greater risk of withdrawing from the labour force or being unable to engage in sustainable income-generating activities.

- **Effectiveness of programs and transition to employment:** Although women with disabilities participate in employment services in large numbers, these programs have limited success in securing jobs for them. Current programs do not sufficiently address the specific barriers faced by women or lack effective pathways from training to employment. Additional measures – such as targeted job placement support, employers’ sensitisation, and post-training follow-up – may be needed to improve employment outcomes.

7 CONCLUSIONS AND RECOMMENDATIONS

7.1 Conclusions

Montenegro has established a comprehensive legal, strategic and institutional framework to support the labour market (re)integration of persons with disabilities. The country ratified the UN CRPD in 2009 and adopted comprehensive strategies, such as the Strategy for Protection of Persons with Disabilities from Discrimination and Promotion of Equality 2022–2027. The specific and anti-discrimination legislation provides a solid regulatory basis. The Employment Agency of Montenegro (EAM) acts as the central hub for employment services, coordinating both mainstream programs and disability-specific supports through its local offices. A dedicated Fund for Professional Rehabilitation and Employment of Persons with disabilities, financed by earmarked contributions from non-compliant employers and public budgets, enables substantial resources to be invested in vocational rehabilitation services and employer incentives. These elements constitute a solid foundation and demonstrate political commitment to inclusion. However, disability mainstreaming across sectors remains uneven.

The policy model is heavily reliant on wage subsidies. While subsidies have contributed to an increase in the number of persons with disabilities in employment, they absorb the majority of available funding. Activation measures, skills development, supported employment services, and employer engagement mechanisms remain comparatively underdeveloped. As a result, despite investing substantial amounts of resources, the labour market situation of persons with disabilities has not been improved significantly in recent years, employment outcomes are not always sustainable, and career progression opportunities are limited.

The current subsidy mechanism's structure, combined with insufficient oversight, substantially undermines its effectiveness. Subsidies are quite generous, covering up to 75% of the average wage for all individuals with disabilities, irrespective of degree of disability, prior work experience, or other relevant factors. There is no upper limit, and the subsidies are effectively provided on a permanent basis. Coupled with inadequate monitoring and control processes, these features may considerably restrict the utility of this mechanism, with limited attention given to potential adverse consequences associated with wage subsidies. The widespread use of this relatively costly instrument constrains the system's capacity to offer alternative or more customised support for persons with disabilities who may need different assistance, and also reduces the number of beneficiaries who can access such support. Furthermore, there is an absence of independent, evidence-based impact assessments of this measure, which impedes meaningful debate regarding possible revisions to enhance its relevance and effectiveness.

Employer engagement remains largely compliance- and financial incentive-driven. Many employers rely on subsidies to offset labour costs but receive limited structured guidance on workplace accommodation, job redesign, or inclusive human resource practices. The absence of a comprehensive employer support framework reduces the transformative potential of the quota system. It is particularly striking, considering persistent negative stereotypes and prejudices towards persons with disabilities and hesitation in employing this category of jobseekers.

Quota compliance in the public sector also remains insufficient. As an important employer, the public sector has the potential to act as a role model for inclusive employment and to set standards for the wider labour market. However, compliance is not systematically monitored, and public institutions are not sufficiently incentivised or supported to fulfil this leadership role. Strengthening public sector accountability and promoting inclusive public employment practices would send an important signal to private employers and contribute to broader labour market inclusion.

Public employment services provide general support to persons with disabilities. This approach ensures the inclusion of persons with disabilities into mainstream programs but lacks sufficient specialisation. There are no dedicated disability employment counsellors, structured supported

employment services, or systematic post-placement follow-up mechanisms. This limits the system's ability to support persons with higher support needs and to ensure long-term labour market integration. Also, there is a **lack of supported-employment instruments**, ensuring that persons with disabilities are supported also in the workplace, strengthening the sustainability of their employment and proper integration in the workplace. As a result, the employment outcomes for persons with disabilities are below expectations.

The system also **lacks workplace retention and return-to-work measures**. The system focuses on hiring unemployed persons with disabilities who have received formal certification of disability. Yet the system does not provide sufficient support for workers who acquire disabilities, nor does it offer sufficient retaining support, especially for those who have not yet acquired formal disability status. This is a major omission in lifecycle employment support.

Institutional capacity is another constraint. The Ministry's rehabilitation unit is small. Recent steps such as the establishment of a national Rehabilitation Centre and exposure to EU best practices are positive but insufficient. Coordination between employment, health, and social care institutions has also been weak, although the ongoing Unified Disability Assessment reform (2023–2025) aims to streamline procedures and create a shared information system. However, cross-referral mechanisms and high-level coordination (e.g., through the underperforming National Disability Council) remain underdeveloped.

Insufficient support for the school-to-work transition. Students with disabilities in Montenegro face multiple barriers in accessing quality and inclusive education, which negatively affects their transition into the labour market. These barriers include inaccessible school infrastructure, limited availability of adapted learning materials and assistive technologies, as well as insufficient access to adequately trained support staff, such as teaching assistants. In addition, structured transition mechanisms such as targeted career guidance, work-based learning opportunities, and dedicated school-to-work transition programmes, remain underdeveloped. As a result, young persons with disabilities often attain lower levels of education and have fewer opportunities to develop labour market-relevant skills, significantly weakening their employment prospects and contributing to their overrepresentation among the unemployed and inactive population. These findings are consistent with evidence highlighting accessibility gaps in education, limited support services, and weak transition pathways into employment.

A significant systemic gap in Montenegro's framework for disability rights lies in the **lack of effective oversight and validation of disability certificates** after they are issued. Although formal procedures exist for obtaining such certificates, there is no consistent mechanism for monitoring their continued validity, conducting periodic reassessments, or ensuring coordinated data exchange between relevant institutions. This creates risks of misuse, inefficient allocation of limited social resources, and diminished public trust in the system, while potentially disadvantaging persons with genuine disabilities. Addressing this issue requires clearer legal provisions on validity periods, the establishment of a centralised registry or monitoring system, and stronger inter-institutional coordination implemented in a manner that safeguards the dignity, rights, and accessibility needs of persons with disabilities.

Gender gap. Disability employment in Montenegro is marked by significant gender disparities. More than half have only basic education, limiting their labour market opportunities. Current employment measures are largely gender-neutral and do not adequately address structural barriers faced by women with disabilities, including caregiving responsibilities and employer bias. While national gender equality and disability strategies acknowledge these challenges, concrete targeted measures and dedicated resources remain limited. Addressing this gap will require systematically integrating a gender perspective into disability employment policies, including targeted activation measures, improved access to skills development, and support mechanisms that enable women with disabilities to participate fully in the labour market.

Benefit structures and institutional fragmentation may discourage labour market participation. Certain income support measures are conditional on employment status, creating disincentives to accepting employment, especially where wages are low or employment is insecure.

Data limitations and weak monitoring systems constrain evidence-based policymaking. Labour market indicators disaggregated by disability are not systematically available, and programme outcomes and effectiveness are not regularly evaluated in terms of retention, job quality, or career progression.

Overall, Montenegro's system has strong financial and legal foundations, but it requires a strategic shift from a subsidy-dominated approach to a more balanced and sustainable employment support model.

7.2 Recommendations

Considering the above conclusions, a set of targeted recommendations is proposed to strengthen labour market (re)integration and skills development for persons with disabilities. The recommendations are ordered roughly from more immediate, feasible actions to longer-term structural reforms. Each recommendation is framed positively and assigned to the relevant institution(s) for implementation:

A comprehensive analysis and revision of the existing system of financial incentives for employment

Particularly, the analysis and revision of wage subsidies is essential to ensure their effectiveness, fairness, and long-term viability. This review should seek to establish a balanced and evidence-based approach that promotes the meaningful inclusion of persons with disabilities in the labour market, while simultaneously mitigating potential adverse effects such as deadweight loss, substitution, or lock-in. The instrument should also be assessed considering budgetary constraints and the availability of alternative measures, to guarantee the most effective policy package for persons with disabilities (for further information, see Box 1 in Chapter 4.1).

It is important to conduct an impact study focusing on how the instrument affects employment opportunities for people with disabilities, alongside a detailed analysis of its costs and benefits.

Based on this analysis, the system should be gradually adjusted. The recommended direction would be introducing appropriate upper reference levels for wage subsidies, alongside time limitations and progressive tapering mechanisms. At the same time, a more differentiated and targeted approach should be considered. For instance, higher subsidy levels and longer duration could be maintained for persons with disabilities entering the labour market for the first time or re-entering after illness or injury or with severe disability.

Strengthening monitoring and control mechanisms should be an integral part of this reform, ensuring greater transparency, efficiency, and accountability in the use of public funds.

Such a recalibration would enable a more strategic allocation of resources, gradually shifting expenditures towards activation measures, skills development, supported employment, and improved monitoring systems. To support this transition, wage subsidies could be more closely linked to participation in training programmes and employment retention outcomes. In parallel, consideration could be given to earmarking a defined share of resources specifically for activation and skills development measures.

- financial incentives should also be complemented by structured, employer-focused services. The Employment Agency should thus introduce:
- employer advisory services on workplace accommodation and disability management;
- practical guidance tools and model policies for inclusive recruitment and retention;
- regular employer outreach and awareness-raising activities in cooperation with employers' associations, with particular emphasis on leveraging the role of the Chamber of Commerce, given the mandatory membership of companies, to provide structured guidance, advisory services, and

practical support to businesses on workplace adjustments, inclusive practices, and compliance with relevant standards. Peer-learning initiatives showcasing good practice.

Such measures would help promote sustainable behavioural change among employers, moving beyond compliance-driven hiring towards genuine workplace inclusion.

Strengthen specialization within public employment services

The Employment Agency of Montenegro should develop a structured disability employment service model. Several options could be considered for organising specialised support. One approach would be to establish dedicated disability employment counsellors within local offices or at the central level, working in close daily coordination with local branches. Another option would be to outsource specialised services to NGOs and organisations of persons with disabilities (OPDs) with expertise in different types of disabilities.

These reforms should be complemented by specialised training for employment counsellors on disability inclusion, reasonable accommodation and supported employment methodologies. Caseloads for counsellors working with persons with disabilities should also be reduced to allow for more intensive and individualised support.

The accessibility of public employment services should be further strengthened. This includes adapting physical infrastructure to meet the needs of persons with reduced mobility, hearing or visual impairments, and neurodivergent individuals. All materials, websites, digital portals and job vacancy announcements should be made fully accessible.

Existing services, particularly job placement, should be reinforced to compensate for the structural disadvantages faced by persons with disabilities in accessing the labour market. This would require more systematic cooperation with employers, including preparation of management teams and co-workers, tailored preparation of candidates for specific workplaces, and structured post-placement follow-up to support job retention.

In addition, Montenegro should establish a comprehensive supported employment model combining:

- individualised job matching;
- job coaching and workplace mediation;
- gradual integration into the workplace. and
- retention support for both the employee and the employer.

Such a model would strengthen sustainable labour market inclusion rather than focusing solely on initial placement outcomes.

Expand accessible vocational training and adult learning opportunities for persons with disabilities

Particular attention should be paid to:

- digital and ICT skills;
- sectors with labour shortages;
- retraining programmes for adults acquiring disabilities mid-career;
- improved accessibility of mainstream training providers.

Ensuring the active promotion and monitoring of the participation of persons with disabilities in universal ALMPs.

Strengthen school-to-work transition mechanisms

Targeted transition support for young people with disabilities needs to be developed and enhanced. As a priority, the Ministry of Education and the EAM should continue with the work together on a pilot "school-to-work transition" program. This pilot includes career guidance and job coaching during

secondary school, with even more intensive support for students with disabilities in their final year, as well as arrangements for internships or apprenticeships with supportive employers. Students should also be encouraged to register early with the EAM if they have difficulty finding meaningful employment. Public employment services should play a role by implementing programs aimed at youth with disabilities, helping them find jobs quickly and supporting them in keeping those jobs.

One approach is to leverage the existing Youth Guarantee framework (which Montenegro is adopting) to explicitly include young people with disabilities; another is to use secondary schools' career centres to identify students in need of additional assistance. Any pilot program should be carefully monitored and, if successful, scaled up across the country. This strategy can help prevent young people with disabilities from becoming inactive and instead guide them toward further training or employment.

Review benefit interactions to support labour market participation

Montenegro should conduct a comprehensive review of disability-related benefit schemes that interact with employment income, particularly disability pensions entitlements. The review should assess whether current rules protect persons with disabilities from poverty while avoiding disincentives to labour market participation. Possible reforms could include introducing gradual tapering of benefits when beneficiaries enter or increase employment, allowing partial retention of benefits during defined transition periods, and establishing trial work arrangements that enable persons with disabilities to test employment without immediately losing benefit entitlements. Such arrangements could also help employers gain practical experience in inclusive recruitment and reduce concerns about hiring persons with disabilities. These reforms would support smoother transitions into work while maintaining income security.

Strengthen the gender perspective within employment measures for persons with disabilities

Employment policies and programmes should integrate a robust gender perspective to ensure equitable access and outcomes for women with disabilities. This should include the development and implementation of targeted employment and entrepreneurship support tailored specifically for women with disabilities. Measures to improve access to childcare and flexible work options are essential for enabling participation.

Furthermore, programme outcomes should be systematically monitored by gender, with a view to addressing compounded barriers faced by women with disabilities. To promote equity, explicit targets for the participation of women with disabilities in active labour market measures must be set, while introducing outreach and support mechanisms tailored to their needs. These may include providing caregiving support where required, and working proactively with employers to counter gender biases.

Promote public sector leadership

Public institutions should be incentivised and supported to proactively fulfil quota obligations and demonstrate leadership in disability-inclusive employment. To this end, it is recommended to establish a dedicated initiative to strengthen the capacity of public institutions to recruit, retain and support persons with disabilities.

The initiative should include the following components:

Review and adaptation of recruitment practices. Recruitment procedures should be reviewed to ensure they are inclusive, accessible and actively encourage applications from persons with disabilities. This includes accessible vacancy announcements, reasonable adjustments during selection procedures, and clear communication of available accommodations.

Internship and work-exposure programmes. Establish structured internship or traineeship programmes for jobseekers with disabilities within public institutions. Such programmes should enable participants to gain practical work experience in the public sector, while allowing institutions to build experience and confidence in employing persons with disabilities.

Workplace accessibility programme. Launch a programme to improve the accessibility of workplaces in public institutions. This may include accessibility audits, implementation of necessary adaptations, and provision of reasonable accommodation for specific positions and employees.

Capacity building for management and HR functions. Provide targeted training and counselling to middle management, HR departments and occupational health and safety teams. Support should focus on inclusive management practices, team preparation, workplace integration, and effective implementation of reasonable accommodation.

Monitoring, reporting and promotion of good practice. Ensure systematic collection and annual publication of data on the employment of persons with disabilities in public institutions. Reporting should be accompanied by recognition and promotion of leading institutions and good practices, reinforcing positive role models within the public sector.

Strengthen monitoring, data collection, and evaluation

Montenegro should strengthen access to statistical data, as well as the monitoring and evaluation of interventions targeting persons with disabilities. Labour market data (LFS and EU-SILC) should be systematically disaggregated by disability status, and key disability-related indicators should be regularly produced and published.

For programs supporting the employment of persons with disabilities, more comprehensive monitoring data should be collected and made publicly available. In particular, a results-based monitoring system should be established to track employment outcomes, including job placement, retention rates and the quality of employment.

In addition, rigorous impact evaluations of employment support measures for persons with disabilities should be undertaken. As a priority, evaluations should be conducted of the quota and wage subsidy mechanisms, as well as of interventions related to training and vocational rehabilitation.

7.3 Best practices

Montenegro's experience to date highlights several best practices and innovative approaches that offer valuable lessons for promoting inclusive employment:

- **Dedicated funding mechanism for inclusion:** The use of a quota-levy system and the establishment of the Persons with Disabilities Fund provide a sustainable financial basis for disability programs. Employers who do not meet hiring quotas contribute to the Fund, which in turn finances wage subsidies, training, and workplace adaptations. This model has enabled a rapid scale-up of support – contributing to a nearly 600% increase in the number of persons with disabilities employed in the open labour market over seven years. The ring-fenced funding ensures resources for the employability of persons with disabilities are available even in a small economy, illustrating best practice in mobilizing domestic financing for social inclusion.
- **Active involvement of persons with disabilities in policy design and oversight:** Montenegro ensures that organizations of persons with disabilities (OPDs) have a voice in governance structures. Persons with disabilities or their representatives sit on the Fund Management Council and other coordinating bodies, meaning they can influence how programs are run. Moreover, the ongoing 2025 reform of the disability employment law set a positive example by formally including at least three NGO representatives as full members of the law's working group. This participatory approach – encapsulated by the “Nothing about us without us” principle – is a best practice that improves the relevance and acceptance of policies. It ensures that the lived experience of persons with disabilities directly informs legislation, making programs more responsive to actual needs.
- **Integration of services within a one-stop employment system:** Rather than segregating disability services in separate structures, Montenegro has integrated support for Persons with disabilities into its national Employment Agency service network. A person with a disability registers at the same employment office as any jobseeker and receives an individual employment plan, while still being able to access specialized rehabilitation and support measures through that channel. Such an inclusive service model shows that persons with disabilities are not sent to a completely separate system; they benefit from mainstream employment services *plus* additional

tailored assistance. It fosters equal treatment and makes efficient use of institutional capacity. Other countries often struggle with coordination between general and specialized services. Montenegro's approach of housing them under one roof (with a dedicated department and case officers within EAM) is a promising practice for coherence and simplicity in service delivery.

- **Innovative grant schemes fostering partnerships:** Montenegro has pioneered the use of competitive grant schemes to encourage innovative projects for the employment of persons with disabilities. Through public calls financed by the Persons with Disabilities Fund, the EAM funds proposals by NGOs, training institutions, municipalities or companies that create job opportunities for persons with disabilities, often via partnerships (e.g., an NGO partnering with local businesses). For example, in mid-2025, the EAM awarded grants to 10 projects across the country that will train and employ over 80 persons with disabilities, with targets for long-term job retention beyond the project period. These projects typically combine vocational training with actual work placements, and some provide ongoing support like job coaching. This grant scheme approach is a best practice in that it leverages the creativity of civil society and the private sector, and it extends the reach of public funding while retaining control over pilots concerning new models such as social enterprises or supported employment. By setting outcome targets (e.g., a minimum share of participants to secure jobs post-project), the scheme also incentivises effective practices. Such cross-sector collaboration and outcome-oriented project funding can be replicated to tackle complex employment inclusion challenges.
- **Legislative alignment with international standards:** Montenegro's legal reforms demonstrate a commitment to aligning with the CRPD and EU best practices. The country not only ratified the CRPD but is actively updating national laws to reflect its principles. For instance, the new Law on Professional Rehabilitation and Employment of persons with disabilities (under development in 2025) is expected to introduce the right to reasonable accommodation in employment and strengthen anti-discrimination provisions. Likewise, disability rights are being embedded in broader laws (Labour Law, anti-discrimination law) and strategies (e.g., gender equality, youth). This comprehensive legislative approach is best practice in creating an enabling environment, as it ensures that the goal of inclusion is supported by modern legal tools, from accessibility requirements to affirmative action. Montenegro's experience shows the importance of continual legal alignment – backed by the primacy of international conventions in domestic law – as a driver for policy coherence and institutional reform.
- **Unified and modernized disability assessment system:** A notable reform underway is the shift to a unified disability determination system that applies a social-model, functional assessment across sectors. Instead of multiple fragmented commissions (for employment, social benefits, pensions, etc.), Montenegro is establishing one national Commission and a single e-registry of persons with disabilities. This reform is highlighted as a best practice because it will greatly simplify the user experience (one assessment opens access to various entitlements) and will ensure consistency in how disability is defined for different services. By incorporating criteria on functional abilities and support needs, the new system moves away from a purely medical model, aligning with CRPD principles. The integrated e-registry will also enable better data sharing and coordination among institutions. Once implemented, this unified assessment mechanism can serve as an example for other countries seeking to eliminate bureaucratic hurdles and adopt a more person-centered approach to eligibility for programs.
- **Dedicated rehabilitation and training infrastructure:** Montenegro's establishment of specialized institutions like the national Center for Professional Rehabilitation (and centers such as "ZOPT" for adult education and rehabilitation) illustrates a commitment to building infrastructure for skills development of Persons with disabilities. Equipped with trained staff and assistive technology, these centers provide tailored training, therapy, and counselling that general services may not offer. The presence of such a center is a good practice in ensuring expertise and resources are available to help persons with disabilities become work-ready. For instance, individuals who need intensive rehabilitation or skill adaptation can receive it in a dedicated facility before entering the open labour market, increasing their chances of success. While Montenegro is still expanding the

reach of these services, the model of a well-resourced rehabilitation center integrated into the employment support system is a commendable practice for others to consider in enhancing the quality of support.

- **International cooperation and continual learning:** Montenegro actively leverages international support and exchanges to strengthen its system, which is a best practice in capacity development. Through EU-funded projects (such as a Twinning project on active labour market measures) and the European Network of Public Employment Services, EAM staff have been exposed to EU best practices in case management and employer services. The government also works closely with UN agencies (e.g., UNDP) on designing reforms and strategies. This openness to external expertise and commitment to learning have facilitated modern solutions like the unified assessment reform and the inclusive law-drafting process. It underlines the value of aligning national initiatives with proven approaches from other countries, and of seeking technical assistance to implement complex reforms. Montenegro's example shows that continuous learning and partnership – whether for policy design, staff training or pilot programmes – can accelerate the adoption of best practices in disability employment inclusion.

ANNEX

List of institutions and organizations

The interviews were carried out with the following institutions and organizations:

- Ministry of Labour, Employment and Social Dialogue
- Union of the Blind of Montenegro
- Association of Youth with Disabilities of Montenegro (UMHCG)
- United Nations Development Programme in Montenegro (UNDP)
- Ministry of Social Welfare, Family Care and Demography
- Ministry of Human and Minority Rights
- Employment Agency of Montenegro - The Fund for Professional Rehabilitation and Employment of Persons with Disabilities
- International Labour Organization in Montenegro

ACRONYMS

EAA	European Accessibility Act
AB	Assignment Beneficiary
ALMM	Active Labour Market Measures
ALMP	Active Labour Market Policy
CRPD	Convention on the Rights of Persons with Disabilities
DPO	Disability Persons Organisation
EAM	Employment Agency of Montenegro
EC	European Commission
ETF	European Training Foundation
EU	European Union
GAP III	Gender Action Plan 2021-2025
GALI	Global Activity Limitation Indicator
GDP	Gross Domestic Product
IT	Information technology
ICT	Information and Communication Technology
LFS	Labour Force Survey
NGO	Non-governmental organisation
MSs	Member States
MONSTAT	Statistical Office of Montenegro
NEET	Not in Employment, Education, or Training
OPD	Organisation of Persons with Disabilities
PCs	Partner Countries
PES	Public Employment Services
PPP	Purchasing Power Parity
PWDs	Persons with disabilities
SILC	Survey on Income and Living Conditions

UN	United Nations
UNCRPD	United Nations Convention on the Rights of Persons with Disabilities
UNDP	United Nations Development Programme
UNPRPD	United Nations Partnership to Promote the Rights of Persons with Disabilities
YAP	Youth Action Plan

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