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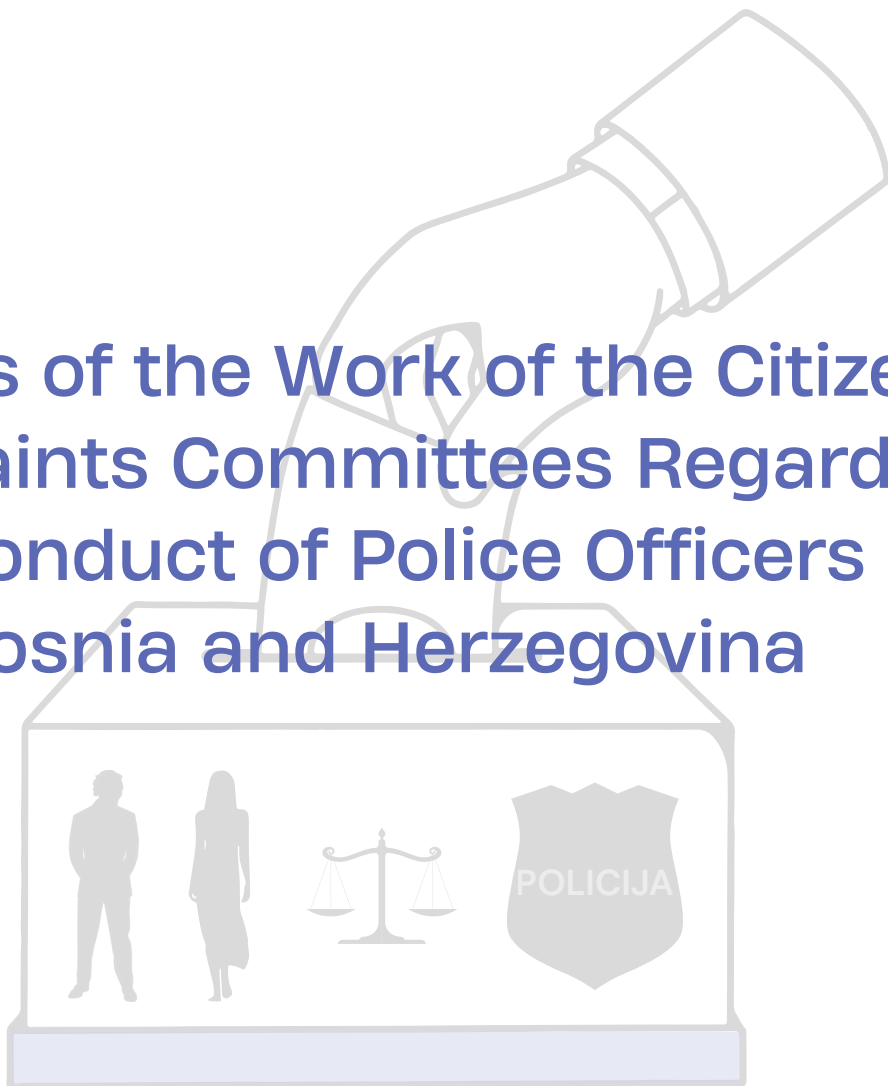


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# Analysis of the Work of the Citizens' Complaints Committees Regarding the Conduct of Police Officers in Bosnia and Herzegovina



**2026**



**Analysis of the Work of Citizens' Complaint  
Committees Regarding the Conduct of Police Officers  
in BiH**

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## **Abstract**

Committees for citizens' complaints regarding the work of police officers represent one of the most important mechanisms of civilian oversight of the police in modern democratic states. Their role is reflected in the protection of human rights and fundamental freedoms, oversight of the legality and professionalism of police conduct, as well as preventive action aimed at preventing the abuse of police powers. Within the complex constitutional-legal and institutional framework of BiH, these committees operate at various levels of government – state, entity, and cantonal – which makes the police oversight system specific, but at the same time fragmented.

The subject of this research is the analysis of the work of citizens' complaint committees in BiH, with a particular focus on their institutional position, functioning, and actual effectiveness in protecting citizens' rights. The research covered the work of six bodies: the Citizens' Complaint Committee on the Work of Police Officers in the police bodies of BiH, the Citizens' Complaint Committee of the Parliament of the Federation of BiH, the Committee for Public Complaints of the Una-Sana Canton, the Citizens' Complaint Committee of the Tuzla Canton, the Public Complaints Office of the Zenica-Doboj Canton, and the Public Complaint Committee of the Assembly of Sarajevo Canton. The selection of these bodies enabled an overview of the functioning of the complaint mechanism at different levels of government and within different normative and institutional frameworks.

The aim of the research was to determine the extent to which citizens' complaint committees fulfill their protective, supervisory, and preventive functions, as well as their contribution to the professionalization of police work and the strengthening of citizens' trust in police institutions. Particular attention was given to the analysis of the number of complaints received, their outcomes, the number of established breaches of official duty and imposed sanctions, as well as the analysis of citizens' awareness of the existence and role of these bodies.

Regarding the research-methodological approach, the study is based on a combination of primary and secondary data sources. Primary, i.e., empirical

data were obtained using the survey method with two techniques. The first involved the preparation and distribution of a structured questionnaire to relevant institutions, while the second entailed conducting an online survey with a sample of 363 respondents. Secondary data were obtained through qualitative content analysis of documents, including relevant legal and sub-legal acts, as well as annual reports on the work of the competent committees. The analysis of the collected data was conducted using descriptive statistical analysis for the survey data, while qualitative content analysis was used for the secondary data.

The research results indicate a pronounced discrepancy between the number of complaints received and the number of established breaches of official duty. At the state level, during a four-year period, a total of 451 complaints regarding the work of police officers in the police bodies of BiH were received, of which only 26 complaints were found to be well-founded, while 6 police officers were sanctioned or suspended. At the cantonal level, similar patterns were observed: in the Una-Sana Canton, 185 complaints were received, with only one sanction imposed, while in the Zenica-Doboj Canton, out of 361 complaints considered, 15 were found to be justified. In the Sarajevo Canton, during the period 2022–2025, 724 complaints were received, of which 35 were found to be justified, and 14 police officers were disciplinarily sanctioned.

A particularly significant finding concerns the fact that citizens use the possibility of directly addressing the citizens' complaint committees in a very small percentage of cases. In most analyzed cases, only 5% of complaints were submitted directly to these bodies, while the remaining complaints were received through police institutions.

Such data may indicate a low level of citizens' awareness of the existence and role of the committees or potential distrust in their effectiveness.

Survey data further confirm these findings. Although 47% of respondents stated that they are very familiar with police powers, a significant number of citizens admitted to having only partial or no knowledge of this area. The most important finding reached by the research team through the survey is that 47% of respondents reported having faced unprofessional conduct by

police officers, but did not file a formal complaint, while only 7% of respondents indicated that they had used available protection mechanisms in such situations.

Based on the conducted research, it can be concluded that citizens' complaint committees in Bosnia and Herzegovina represent an important but underutilized mechanism for protecting citizens' rights and overseeing police work. Their practical effectiveness largely depends on institutional independence, continuity of work, and the level of public awareness. Improving the normative and institutional framework, along with systematic education of citizens on police powers and available legal remedies, represents a key prerequisite for strengthening trust between the police and citizens, and for building a functional and democratic society based on the rule of law.

Harmonizing the organizational structures of the committees can contribute to their independence, and ensuring the authority to conduct investigations independently, as well as regularly informing citizens about their rights and the existence of complaint mechanisms, would define a unified system that citizens can more easily access. By increasing transparency and educating the public, the credibility of institutions and citizens' trust in police work is strengthened.

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## List of abbreviations

BiH – Bosnia and Herzegovina

DCPB BiH – Direction for Coordination of Police Bodies of BiH

FBiH – Federation of Bosnia and Herzegovina

BP BiH – Boarder Police of BiH

SC – Sarajevo Canton

MIA – Ministry of Internal Affairs

MIA SC – Ministry of Internal Affairs of Sarajevo Canton

MIA TC – Ministry of Internal Affairs of Tuzla Canton

MIA USC – Ministry of Internal Affairs of Una-Sana Canton

MIA ZDC – Ministry of Internal Affairs of Zenica-Doboj Canton

PA BiH – Parliamentary Assembly of BiH

RS – Republic of Srpska

SIPA – State Investigation and Protection Agency

TC – Tuzla Canton

USC – Una-Sana Canton

ZDC – Zenica-doboj Canton

## Introduction

Citizens' complaint committees on the work of police officers (committees) serve as a protective and preventive mechanism within democratically governed states. The protection of citizens and their rights and freedoms, through the enforcement of the law and maintenance of public order and peace, is ensured by the police, i.e., police officers. To achieve this, police officers operate within the powers granted to them by law. However, what happens when police officers act beyond their authorized powers? That is when citizens' complaint committees come into play. As previously mentioned, it is possible to define a threefold function of citizens' complaint committees: protective, supervisory, and preventive. The basis of these committees' work is the protection of citizens in cases where their rights and freedoms are threatened or violated by police officers acting outside legally prescribed powers. In addition to the protective role, citizens' complaint committees, through the execution of their primary activities, also act preventively by encouraging police officers to perform their duties and responsibilities at a high professional level, with particular attention to actions within their authorized powers, which represents a form of prevention against violations. Furthermore, by existing and holding a role within the state structure, these committees protect citizens from potential "arbitrariness" of individuals within the police who might intend to abuse the authority and social status granted to them by their position.

The complex constitutional structure of Bosnia and Herzegovina (BiH) has necessitated the establishment and operation of a larger number of citizens' complaint committees. Each committee is responsible for the jurisdiction of cantonal, entity-level, or state-level police agencies. Such institutional dispersion of police oversight represents a specificity of BiH but simultaneously raises questions regarding the uniformity of normative solutions, the efficiency of committee work, and the level of citizens' rights protection at different levels of government. The normative framework for the operation of citizens' complaint committees in BiH is defined by cantonal, entity, and state laws on internal affairs. The primary purpose of committees at all levels of government is the same: to receive, review, and forward citizens' complaints to professional standards units, i.e., internal control departments, and to oversee the implementation of internal procedures. However, legal provisions differ to some extent and combined

with political connotations that often arise during the selection of committee members, this can create operational inconsistencies. This may directly affect the realization of citizens' rights and the public perception of the effectiveness of these mechanisms.

Theoretically and practically, citizens' complaint committees represent a form of external, i.e., civilian, oversight of police officers, which is of exceptional importance for the democratic order and the rule of law. Unlike internal control mechanisms, this system allows citizens to submit their complaints to bodies that are formally separate from police agencies.

In this way, a higher degree of objectivity and impartiality in considering allegations of unlawful, unprofessional, or unethical police conduct is sought to be ensured.

However, in practice, the question arises to what extent citizens' complaint committees in BiH can actually fulfill their protective, supervisory, and preventive functions. Limited powers, the advisory nature of decisions, and dependence on other institutions regarding the implementation of recommendations and conclusions can be considered factors that may reduce the actual effectiveness of committees. Additionally, insufficient public awareness of the existence and role of these committees may pose an obstacle to exercising the right to effective legal remedy.

Considering the above, the subject of this research is the analysis of the work of citizens' complaint committees in BiH, with a particular focus on five selected bodies: the Citizens' Complaint Committee on the Work of Police Officers in the police bodies of BiH, the Citizens' Complaint Committee of the PA FBiH, the Citizens' Complaint Committee of USC, the Citizens' Complaint Committee of TC, the Public Complaints Office of ZDC, and the Citizens' Complaint Committee of SC Assembly. The selection of these bodies allows for an overview of the functioning of this mechanism at different levels of government, as well as within different institutional and normative frameworks.

The aim of the research is to determine the efficiency of the analyzed committees, their role in protecting citizens' rights, and their contribution to strengthening the legality and professionalism of police conduct. Particular

attention is given to the analysis of the number and types of complaints received, the methods of their resolution, the outcomes of procedures, transparency of work, and availability of information to the public. Special attention is also given to the analysis of the number of complaints directly received by the committees to assess citizens' awareness of the existence of these bodies in BiH, as well as a gender-based analysis concerning submitted complaints and the reasons for filing them.

The methodological framework of the research is based on qualitative analysis of relevant laws and sub-legal acts, annual reports on the work of committees, and qualitative and quantitative data collected through research from the examined bodies. The research relies on a combination of primary and secondary data sources. Primary, i.e., empirical data were obtained using the survey method, applying two techniques. The first involved the preparation and distribution of a structured questionnaire to relevant institutions, while the second entailed conducting an online survey with a sample of 363 respondents, which represents a non-representative sample. The questionnaire was created using the "Google Forms" application and disseminated via the "Facebook" social network on 16.1.2026, and the survey was closed on 26.1.2026. Secondary data were obtained through qualitative content analysis of documents, including relevant laws and sub-legal acts, as well as annual reports on the work of competent committees. The analysis of the collected data was performed using descriptive statistical analysis for survey data, while qualitative content analysis was used for secondary data.

This research aims to provide a comprehensive insight into the work of committees and to point out similarities and differences in their functioning. This creates the basis for drawing conclusions that can have practical value in the context of improving the normative and institutional framework.

The effective work of citizens' complaint committees should not be viewed as an obstacle or threat to police authorities, but as an integral part of a modern system of democratic governance. Strengthening the role of these bodies contributes to the protection of human rights and freedoms, the improvement of professional standards of police work, and the building of

trust between the police and citizens, which represents one of the fundamental prerequisites for a stable and democratically organized society.

## **Structure of Committees for Citizens' Complaints regarding the conduct of police officers in BiH**

The structure of citizens' complaint committees in BiH, i.e., their territorial jurisdiction, aligns with the levels of state organization in BiH. Namely, at the state, entity, and cantonal levels, 11 bodies of this type have been established.<sup>1</sup> The jurisdiction of these committees pertains to the work of police officers employed in police agencies operating at the aforementioned levels.

Most citizens' complaint committees on the work of police officers have been formed as independent bodies within assemblies at various levels, while a smaller number are part of ministries of internal affairs. In the territory of the entity of RS and the Herzegovina-Neretva Canton, no bodies in the form of citizens' complaint committees have been established; however, Professional Standards Units<sup>2</sup> operate as a mechanism for handling citizens' complaints regarding police officers' conduct.

Regarding the internal structure of the committees, the mandate of members of all the committees mentioned lasts 4 years, with the difference being that in some committees, the mandate can be extended for an additional 4 years. General conditions for appointing committee members include BiH citizenship, certificates of no criminal record and no pending criminal proceedings; members cannot be political officials or active police officers. Each law establishing a committee defines the required level of education and work experience for members to be appointed. The number of committee members is not the same in all committees and varies from three to seven members.

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<sup>1</sup> Citizens' Complaint Committees are not established in Republic of Srpska, Hezcegovina-Neretva Canton and West Herzegovina Canton

<sup>2</sup> Units for Professional Standards are an integral part of all police administration within ministries of internal affairs, i.e., police agencies operating in the territory of BiH. These units are responsible for conducting internal control of employees' work to ensure lawful, professional, and ethical conduct. Within their work, these units conduct internal procedures, collect evidence, hold interviews, and cooperate with competent prosecutor's offices and other institutions. The units act on citizens' complaints, official information, internal reports, and other grounds, with the aim of establishing facts and accountability. Although they receive citizens' complaints directly, the Units for Professional Standards inform the citizens' complaint committees of all actions taken in response to submitted complaints after the internal procedure has been conducted

## **Citizens' Complaint Committee on the Work of Police Officers in the police bodies of BiH**

Parliamentary Assembly of BiH

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At the BiH level, as an independent body within the Parliamentary Assembly of BiH, the Citizens' Complaint Committee on the Work of Police Officers in the police bodies of BiH (Committee) operates. Police bodies at the BiH level include the State Investigation and Protection Agency (SIPA), Border Police of BiH (BP BiH), and the Direction for Coordination of Police Bodies of BiH (DCPB BiH).

The Committee was established in 2009 at the 58th session of the House of Representatives and the 33rd session of the House of Peoples of the Parliamentary Assembly of BiH (PA BiH) by the Decision on the Appointment of Members of the Citizens' Complaint Committee as an independent body of the police structure of BiH.<sup>3</sup> The procedure and manner of work of the Committee are determined by the Law on Independent and Supervisory Bodies of the Police Structure of BiH, and to the extent not determined by this law, by the Committee's Rules of Procedure, adopted by PA BiH upon the Committee's proposal.<sup>4</sup>

The Committees competencies are:

- a) Receiving, recording, assessing, and forwarding complaints regarding the conduct of police officers of BiH, as well as referring them to the competent police bodies;
- b) Continuously monitoring the stage of each case;
- c) Initiating appropriate proceedings against the complainant in the case of a false or tendentious complaint;
- d) Maintaining all relevant records and databases on citizens' complaints against police officers of BiH, investigation results, and

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<sup>3</sup> Parliamentary Assembly of BiH: „Leaflet of Citizens' Complaint Committee“, [OZG BOS\\_100510.indd](#), accessed: 3/9/2025

<sup>4</sup> Law on Independent and Supervisory Bodies of the Police Structure in Bosnia and Herzegovina („Official Gazette“, number 36/08), [Zakon o Nezavisnim i nadzornim tijelima policijske strukture Bosne i Hercegovine.pdf](#), accessed: 3/9/2025

- e) other factors on the basis of which disciplinary or criminal proceedings were initiated;
- f) Providing all information to the complainant regarding their complaint; and
- g) Informing the Parliamentary Assembly of BiH about its work.<sup>5</sup>

### **Structure and governance of the Citizens' Complaint Committee on the Work of Police Officers in the police bodies of BiH's work**

The Committee consists of 7 members. The members of the Committee are individuals who enjoy social respect, represent the constituent peoples of BiH, and are not employed in police structures at any level in BiH. The Committee is chaired by a President, who has two deputies, and the provisions regarding the representation of the constituent peoples of BiH also apply to these three positions. The mandate of the Committee members lasts four years. The work of the Committee is based on the principle of impartiality with regard to any individual affiliation.<sup>6</sup>

### **Citizens' Complaint Committee on the Work of Police Officers in the police bodies of BiH 2022. – 2025.**

The following presents a detailed analysis of the Committee's work. The analysis is based on official reports for the relevant period published on the official website of the Parliamentary Assembly of BiH (PA BiH) and on data provided by the Committee.

## **2022**

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<sup>5</sup> Ibid.

<sup>6</sup> Parliamentary Assembly of BiH: „Leaflet of Citizens' Complaint Committee“, [OZG BOS 100510.indd](#), accessed: 3/9/2025

During 2022, the Committee received a total of **106 complaints** regarding the work of police officers in police agencies operating at the state level, of which **92% of complaints concerned the work of officers of BP BiH.**<sup>7</sup>

This statistic can be linked to the competencies of the mentioned police agencies, as GP BiH officers come into daily contact with citizens while performing their regular duties, particularly those related to the implementation of the provisions of the Law on Supervision and Control of State Border Crossing and the provisions of the Law on Movement and Stay of Foreigners and Asylum, as prescribed by these laws.<sup>8</sup> On the other hand, the competencies of SIPA include countering terrorism, organized crime, serious financial crime and corruption, investigating war crimes, and witness protection,<sup>9</sup> while the primary tasks of DCPB BiH include coordination of BiH police bodies, international police cooperation, and organizing and conducting physical and technical protection of personnel and facilities of state institutions of BiH and diplomatic missions.<sup>10</sup> Therefore, BP BiH officers come into contact with citizens far more frequently than SIPA and DCPB BiH officers.

During 2022, **25% of complaints submitted to the Citizens' Complaint Committee on the Work of Police Officers in the Police Bodies of BiH were filed by women, 65% by men, and 10% were anonymous.**<sup>11</sup>

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<sup>7</sup> Parliamentary Assembly of BiH: Committee for Citizen's Complaints (2023): „Report on the Work of Committee for Citizens' Complaints of Parliamentary Assembly of BiH for 2022“, [Izvjestaj o radu Odbora za žalbe gr. PSBiH za 2022. - 1.6.23.-B \(1\).pdf](#), accessed: 22/12/2025

<sup>8</sup> Law on Border Police of BiH („Official Gazette of BiH“, No. 50/2004, 27/2007 and 59/2009), [Zakon o graničnoj policiji Bosne i Hercegovine - Paragraf Lex](#), accessed: 22/12/2025/

<sup>9</sup> Law on State Investigation and Protection Agency („Official Gazette“, No. 27/2004, 63/2004, 35/2005, 49/2009, 40/2012), [Zakon o državnoj agenciji za istrage i zaštitu BiH - Paragraf Lex BA](#), accessed: 22/12/2025/

<sup>10</sup> Law on Direction for Coordination of Police Bodies of BiH and on Agencies for Support for Police Structure of BiH („Official Gazette of Bosnia and Herzegovina“, No. 36/08), [Zakon o Direkciji za koordinaciju policijskih tijela i o agencijama za potporu policijskoj strukturi u BiH 0.pdf](#), accessed: 22/12/2025

<sup>11</sup> Data provided by the Citizens' Complaint Committee on the Work of Police Officers in the Police Bodies of BiH for the purpose of the research

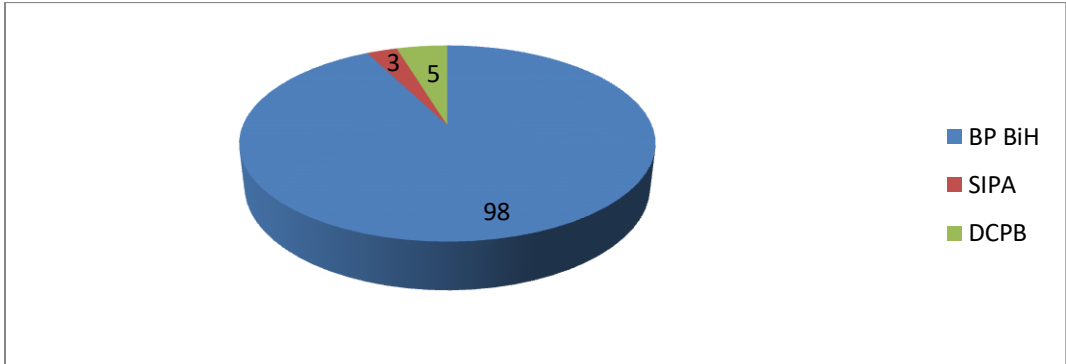


Figure 1 - Number of complaints received regarding police agencies at the state level in 2022 (n=106 complaints)

When it comes to the reasons for filing complaints, during 2022, complaints about the work of police officers of SIPA, DCPB, and BP BiH related to *unprofessional conduct, abuse of position, corrupt behavior, and delays at border-crossings*.

In *10 cases*, the *complaints were found to be justified*, resulting in *four sanctions* after disciplinary procedures, including *one "termination of employment,"* while *one police officer was cleared of responsibility*. In cases of *corruption reports*, the necessary information was also provided to the *Prosecutor's Office of BiH*. During these investigations, deficiencies were identified in the methods and procedures of border checks and controls, which led to the submission of proposals for initiating disciplinary proceedings against the responsible officers for serious breaches of official duty.

Also, in the report of the Citizens' Complaint Committee is stated that on multiple occasions the Committee drew BP BiH's attention to the obligation to comply with the police officers' code, with a particular focus on communication with citizens and proper conduct toward them, and called on BP BiH to take additional measures to protect personal data from official records due to the risk of misuse.

The Committee's report also notes that, to a significant extent, video surveillance was used as evidence in investigations conducted following complaints of corrupt behavior by BP BiH police officers, and the

Committee emphasized the need to establish a functional video surveillance system to combat corruption.

*Although numerous complaints were filed regarding extensive delays at border crossings, none were found to be justified.* The delays were part of standard procedures related to the inspection of passengers and vehicles, and in a few cases were caused by congestion.

After conducting preliminary checks, the Committee determined that certain complaints related to officials of the Indirect Taxation Authority of BiH, as citizens did not clearly distinguish between officers of the two agencies.<sup>12</sup>

## 2023

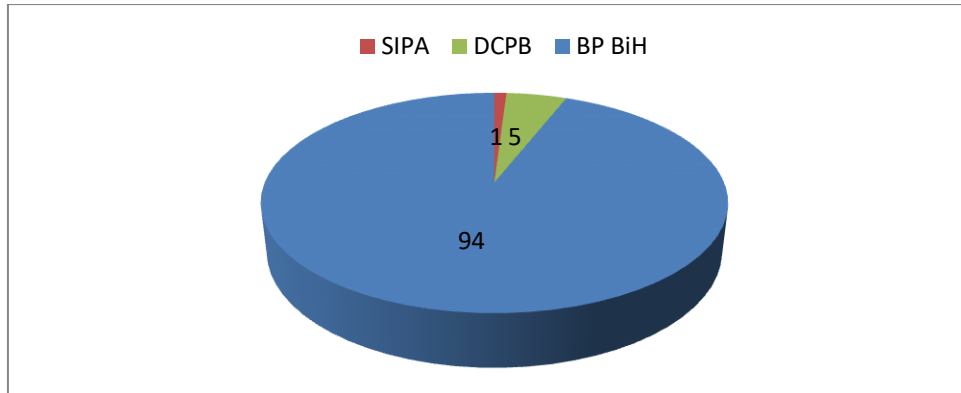
During 2023, the Committee received a total of **136 complaints** regarding the work of police officers employed in administrative organizations with police powers at the state level in BiH, of which **91% of the complaints concerned the work of BP BiH officers**. The reason for this statistic, as described in the previous paragraph, is the constant interaction of BP BiH officers with the citizens of BiH and foreign nationals.

During 2023, **29% of the complaints** submitted to the Committee *were filed by women, 58% by men, and 13% of the complaints were anonymous*.<sup>13</sup>

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<sup>12</sup> Parliamentary Assembly of BiH: Committee for Citizen's Complaints (2023): „Report on the Work of Committee for Citizens' Complaints of Parliamentary Assembly of BiH for 2022“ [Izvjestaj o radu Odbora za žalbe gr. PSBiH za 2022. - 1.6.23.-B \(1\).pdf](#), accessed: 22/12/2025

<sup>13</sup> Data provided by the Citizens' Complaint Committee on the Work of Police Officers in the Police Bodies of BiH for the purpose of the research



**Figure 2 - Number of complaints received regarding police agencies at the state level in 2023 (n=136 complaints)**

The reasons for submitting complaints in 2023 were the same as in the previous year, and there was also a case in which a DCPB BiH police officer falsely presented himself as a high-ranking officer of this agency, resulting in four complaints against his work. In this case, the Committee for Citizens' Complaints emphasized that the conditions for applying Article 112 of the Law on Police Officers of Bosnia and Herzegovina<sup>14</sup>, which defines the suspension of a police officer, were met. Furthermore, during 2023, an increase in the number of complaints related to *violence and threats* was recorded.

Out of the total number of complaints, 18 were found to be justified, 2 police officers were sanctioned, and 3 police officers were suspended until the completion of disciplinary procedures. *The majority of complaints related to prolonged delays at border crossings*, but the main reason cited was the lack of BP BiH police officers.<sup>15</sup> This represents a problem that could have long-term consequences for the security of BiH if it is not addressed effectively. Research has shown that BP BiH lacks 600 employees

<sup>14</sup> Law on Police Officers of Bosnia and Herzegovina („Official Gazette of BiH“, No. 27/04, 63/04, 5/06, 33/06, 58/06, 15/08, 35/09 and 7/12), [Zakon o policijskim službenicima Bosne i Hercegovine - Paragraf Lex](#), accessed: 6/12/2026

<sup>15</sup> Parliamentary Assembly of BiH: Committee for Citizen's Complaints (2024): „Report on the Work of Committee for Citizens' Complaints of Parliamentary Assembly of BiH for 2023“, [Izvjestaj o radu Odbora za žalbe za 2023. B.pdf](#), accessed: 6/1/2026

to meet the staffing quotas of this police agency, and estimates indicate that this number could rise to 900.<sup>16</sup>

The Committee for Citizens' Complaints' report states that, in the given year, frequent complaints were received from citizens that they were *verbally prohibited from crossing the state border* during border control, without a written act being issued. Accordingly, the Committee adopted a conclusion requesting BP BiH to provide a detailed explanation of the legal basis for the issued prohibitions.

It is important to note that, in the given year, a substantial number of complaints concerned the *failure to display the BiH flag at border crossings and reports of damaged or incorrectly placed BiH flags* on flagpoles at state borders. The Committee adopted a conclusion requesting BP BiH to verify the condition of the BiH flags, after which BP BiH provided information that the matter falls under the jurisdiction of the Indirect Taxation Authority of BiH.<sup>17</sup>

## 2024

During 2024, the Committee for Citizens' Complaints at the level of BiH received a total of **100 complaints** regarding the work of police officers employed in administrative organizations with police powers at the state level in BiH, of which **94% of the complaints related to the work of BP BiH police officers.**<sup>18</sup>

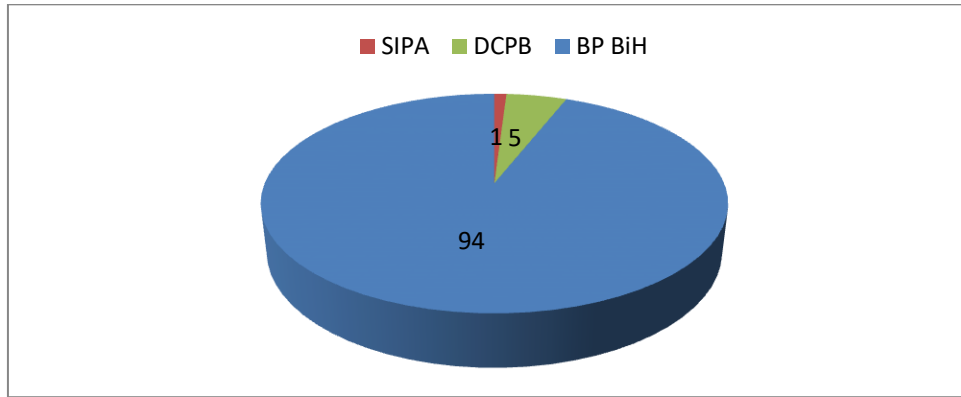
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<sup>16</sup> Tuzlanski.ba (2025): „Report of CSS: Insufficient number of police officers in BiH: SIPA misses 150 police officers, and Border Police - 600“, [Nedostatak policajaca u BiH: SIPA-i nedostaje 150 policijskih službenika, a Graničnoj policiji 600 - Tuzlanski.ba](#), accessed: 6/1/2026

<sup>17</sup> Parliamentary Assembly of BiH: Committee for Citizen's Complaints (2024): „Report on the Work of Committee for Citizens' Complaints of Parliamentary Assembly of BiH for 2023“, [Izvjestaj o radu Odbora za žalbe za 2023. B.pdf](#), accessed: 6/1/2026

<sup>18</sup> Parliamentary Assembly of BiH: Committee for Citizen's Complaints (2025): „Report on the Work of Committee for Citizens' Complaints of Parliamentary Assembly of BiH for 2024“, [17072 Izvjestaj Odbor za žalbe 2024 B \(1\).pdf](#), pristupljeno 6/1.2026

In the given year, **11% of the complaints were filed by women, 75% by men, and 14% of the complaints were anonymous.**<sup>19</sup>



**Figure 3 - Number of complaints received regarding police agencies at the state level in 2024 (n=100 complaints)**

The reasons for submitting complaints were identical to those in the previous two years, and it is important to note that the number of complaints related to *corrupt behavior* significantly decreased.

When it comes to *unprofessional conduct*, the Committee stated in its report that on several occasions it drew the attention of BP BiH police officers to compliance with the Code of Conduct for police officers, with special emphasis on conduct and communication with citizens during border crossing control. During 2024, with the support of the OSCE Mission to BiH<sup>20</sup>, the Committee for Citizens' Complaints carried out visits and inspections of seven border crossings, and four meetings were also held as part of the visit. The said visit was carried out based on citizens' complaints. During the visit, members of the Committee inspected video surveillance, the presence and visibility of informational posters of the Committee for Citizens' Complaints at border crossings, as well as the working conditions of police officers at border crossings, during which it was established that working conditions at certain

<sup>19</sup> Data provided by the Citizens' Complaint Committee on the Work of Police Officers in the Police Bodies of BiH for the purpose of the research

<sup>20</sup> OSCE – Organization for Security and Cooperation in Europe

crossings are poor, which may affect officers' attitude toward their work and toward citizens.

During 2024, in *nine cases* the complaints were *found to be justified*.<sup>21</sup>

## 2025

During 2025, as of 31 October 2025, the date up to which data were collected during the research, the Committee for Citizens' Complaints on the work of police officers in the police bodies of BiH received a total of **109 complaints**. The report for the given year had not been completed at the time of data collection, and therefore it is not possible to present the number of complaints in relation to individual police agencies operating at the state level in BiH.

During 2025, as of 31 October 2025, **27% of the complaints** submitted to the Committee for Citizens' Complaints on the work of police officers in the police bodies of BiH **were filed by women, 64% by men, and 9% of the complaints were anonymous**.<sup>22</sup>

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<sup>21</sup> Parliamentary Assembly of BiH: Committee for Citizen's Complaints (2025): „Report on the Work of Committee for Citizens' Complaints of Parliamentary Assembly of BiH for 2024“, [17072\\_Izvjestaj\\_Odbor\\_za\\_zalbe\\_2024\\_B\(1\).pdf](#), accessed: 6/1/2026

<sup>22</sup> Data provided by the Citizens' Complaint Committee on the Work of Police Officers in the Police Bodies of BiH for the purpose of the research

### Graphic comparison (2022-2025)

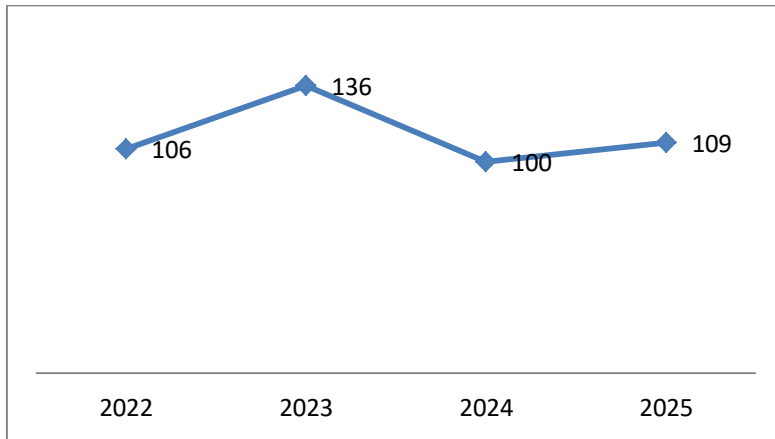


Figure 4 - Number of complaints through years (2022–2025); Remark: data for 2025 reflects the period from 01.01.2025. to 31.10.2025.

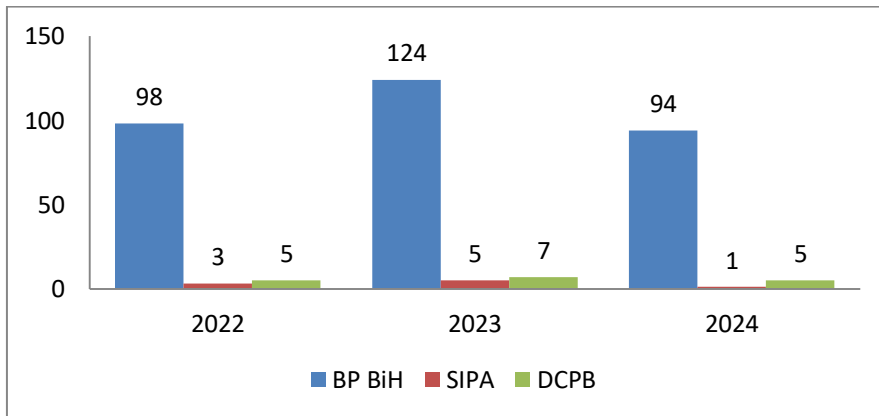


Figure 5 - Number of complaints received regarding police agencies at the state level (2022–2024)

Analysis of the Work of the Citizens' Complaint Committees Regarding the Conduct of Police Officers in Bosnia and Herzegovina | 2026

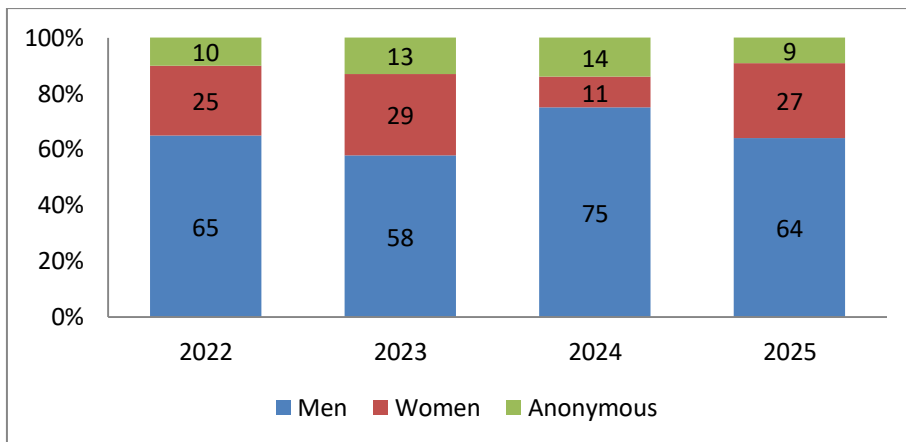


Figure 6 - Gender structure of complainants (2022-2024); Note: data for 2025 reflects the period from 01.01.2025. to 31.10.2025.

## **Citizens' Complaint Committee of the Parliament of the Federation of BiH**

Parliament of Federation of BiH  
Hamdije Kreševljakovića 3  
71 000 Sarajevo, +387 33 203-653  
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At the level of the Federation of BiH, the Citizens' Complaints Board operates as an independent body of the Parliament of the Federation of BiH. This Board was established by the Law on Internal Affairs of the Federation of BiH.<sup>23</sup>

The Law on Internal Affairs of the Federation of BiH defines the Board as the body responsible for receiving complaints regarding the work of police officers. The objective of this Committee is to ensure objective and impartial conduct of proceedings related to complaints filed against the work and conduct of police officers, thereby ensuring the protection of human rights and freedoms. The Committee submits a request for initiating internal proceedings against police officers due to their violation of official duty.

When it receives a complaint regarding the work of a police officer, the Committee forwards it to the Professional Standards Unit of the Federal Police Administration within 15 days from the date of receipt of the complaint and requests the initiation of internal proceedings against the police officer to whom the complaint refers. Within 15 days from the date on which the Committee forwarded the complaint to the Professional Standards Unit, the Unit informs the Committee of all actions taken in relation to the subject complaint following the conducted internal proceedings, on which the Committee is obliged to give an opinion. If the Committee does not agree with the opinion of the Professional Standards Unit, it is obliged within 15 days to request that the Unit submit a request for initiating disciplinary proceedings against the police officer, and the Unit is obliged within 15 days to submit the request to the Disciplinary Commission, which is responsible

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<sup>23</sup> Parliament of Federation of Bosnia and Herzegovina: „Citizens' Complaint Committee“, [Parlament Federacije Bosne i Hercegovine DOM NARODA |<br /> <b>Notice</b>: Undefined index: Naziv in <b>/home/parlame2/public\\_html/v2/hr/stranica.php</b> on line <b>68</b><br />](#), accessed: 15/9/2025

for conducting the disciplinary proceedings and imposing a disciplinary sanction.

### **Structure and governance of Citizens' Complaints Committee of the Parliament of BiH's work**

The members of the Committee are distinguished experts in the field of legal or other social sciences. They are appointed by the bodies of the House of Representatives and the House of Peoples of the Parliament of FBiH responsible for security. The Committee consists of three members and reflects the national representation of peoples in BiH as well as gender representation. One member of the Committee is appointed from the Federal Ministry of Internal Affairs of FBiH with the status of a civil servant, while the other two members are selected from among citizens. All members of the Committee must have at least 5 years of work experience after obtaining a higher education degree.

The Citizens' Complaints Committee of FBiH is managed, i.e. chaired, by the Chair of the Committee, who must have at least 10 years of work experience in legal affairs as a senior civil servant or as a judge or prosecutor and is one of the representatives of citizens. The mandate of the members of the Committee lasts 4 years and cannot be extended.<sup>24</sup>

### **Work of Citizens' Complaints Committee of the Parliament of BiH 2022. – 2025.**

The Citizens' Complaints Committee of the Parliament of FBiH did not perform its function during the period in question. Namely, a public call for the appointment of the Committee was announced in 2022, and following the conducted selection procedure, the House of Representatives of the Parliament of FBiH adopted a decision on the appointment of the

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<sup>24</sup> Law on Internal Affairs of Federation of Bosnia and Herzegovina („Official Gazette of Federation of BiH“, No. 49/05 i 75/13), [Zakon o unutrašnjim poslovima Federacije Bosne i Hercegovine](#), accessed: 23/10/2025

Committee, but the House of Peoples of the Parliament of FBiH did not consider that decision. This resulted in the fact that in 2024, the Speaker of the House of Representatives and the Speaker of the House of Peoples of the Parliament of FBiH initiated and held a meeting with the Joint Working Group of the Commissions for Selection and Appointment of both Houses of the Parliament of FBiH. On that occasion, they requested that procedures be initiated for the selection and appointment of members of several special bodies established within the Parliament of FBiH, including the Citizens' Complaints Committee.<sup>25</sup> The said Joint Working Group announced a public call for the appointment of the Citizens' Complaints Committee of the Parliament of FBiH in March 2025, which was annulled and re-announced in August of the same year<sup>26</sup> and the Committee has not yet been appointed.

Such a situation represents a certain problem and illustrates the long-term dysfunctionality of certain special bodies of the Parliament of FBiH, some of which, such as the Committee in question, are crucial for the adequate protection of human rights. The Law on Internal Affairs of FBiH provides that the Professional Standards Unit of the Federal Police Administration is responsible for conducting internal proceedings against police officers in cases of citizens' complaints, thereby the right to complaint is not denied. However, external oversight over the said proceedings, which is exercised through the work of the Citizens' Complaints Committee of the Parliament of FBiH, is denied.

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<sup>25</sup> Patria (25.06.2024.), Amra Vrabac: „Mioković i Martinović dictated which public calls should be announced, first FTV and then the Citizens' Complaint Committee, the Independent Committee...“, [Mioković i Martinović izdiktirali koje konkurse treba raspisati, prvo FTV pa onda Odbor za žalbe građana, Nezavisni odbor...](#), accessed: 19/12/2025

<sup>26</sup> Parliament of Federation of Bosnia and Herzegovina: Public calls: Annulment and re-announcement of the Public Call for the appointment of the Citizens' Complaints Committee (11.08.2025.), [PONIŠTENJE I OBJAVA JAVNOG KONKURSA\\_ ODBOR ZA ŽALBE\\_B.docx - Google dokumenti](#), accessed: 19/12/2025

## **Committee for Public Complaints of Una-Sana Canton**

Assembly of Una-Sana Canton

Ulica Alije Đerzeleza 6, 77 000 Bihać

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[kabinet@skupstinausk.ba](mailto:kabinet@skupstinausk.ba)

In the territory of Una-Sana Canton (USC), Committee for Public Complaints (Committee) is responsible for receiving and processing complaints from citizens regarding the work of police officers of the Police Administration within the Ministry of Internal Affairs of USC (MIA USC).

The Committee was established as an independent body of the Assembly of USC and is appointed by the Assembly of USC, upon the proposal of the Commission for Selection and Appointment of the Cantonal Assembly. The Committee is obliged to receive complaints about the work of police officers and to notify the Unit for Professional Standards within the Police Administration of the MIA USC about them, within the same deadlines as defined by the Law on Internal Affairs of FBiH. Furthermore, the procedure for handling complaints and the deadlines for action by the Professional Standards Unit of MIA USC in these cases are regulated in the same manner as at the level of FBiH.

### **Structure of the Committee for Public Complaints of USK**

The members of the Committee are distinguished experts in the field of legal or other social sciences. The Committee consists of three members and reflects the national representation of peoples in BiH as well as gender representation. One member of the Committee is a civil servant of the cantonal administrative bodies, while the other two members are selected from among citizens. All members of the Committee must have at least five years of work experience after obtaining a higher education degree.

The Citizens' Complaints Committee of USC is managed, i.e., chaired, by the Chair of the Committee, who must have at least 10 years of work

experience in legal affairs as a civil servant or as a judge or prosecutor and is one of the representatives of citizens. The mandate of the members of the Citizens' Complaints Committee of FBiH lasts 4 years and cannot be extended.<sup>27</sup>

### Work of the Committee for Public Complaints of USK 2022. – 2025.

Below is a detailed analysis of the work of the Citizens' Complaints Committee of USC. The analysis is based on data provided by the Committee, which relate to the period from 2022 to 2025.

#### 2022. – 2025. godina

During the given period, the Citizens' Complaints Committee of USC received a total of **185 complaints**.

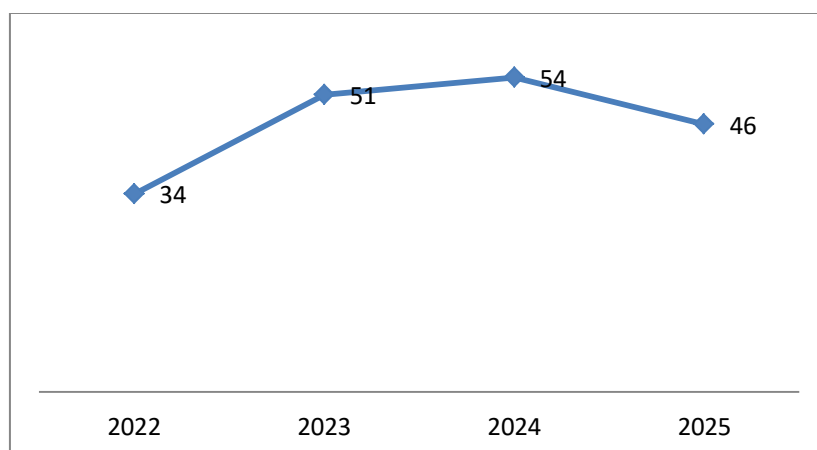


Figure 7 - Number of complaints through years (2022–2025); Note: data for 2025 reflects the period from 01.01.2025. to 31.10.2025.

During the reviewed period, one disciplinary sanction was imposed on a police officer of the Police Administration of MIA USK for a minor breach

<sup>27</sup> Law on Internal Affairs of Una-Sana Canton („Official Gazette of Una-Sana Canton“, br.13/16), [Zakon Unutrasnji Psolovi USK 13 16 | PDF](#), accessed: 23/10/2025

of official duty, while in one case the police officer was acquitted. It is important to note that, during the research period, the Citizens' Complaints Committee of USC is awaiting the decisions of the Disciplinary Commission of the Police Administration of the Ministry of Internal Affairs of USC in 10 cases.

Regarding complaints that were dismissed due to identified irregularities during submission, there were none in the given period. Namely, if irregularities are detected during the submission of a complaint, such as a lack of the submitter's signature, which does not apply to complaints received via e-mail, illegibility of the complaint, etc., the party is invited, in accordance with the Law on Administrative Procedure of FBiH and within the deadline defined by the same law, to remedy the deficiencies.<sup>28</sup> This is regulated under Article 67 of the mentioned law, and the deadline for correction is set by the authority that received the submission, which is obliged to take the necessary actions to ensure that the deficiencies are corrected.<sup>29</sup> An approach like this, along with the legal provisions that define it, represents good practice in the area of human rights protection and in building citizens' trust in the police and the security system. The Rules of Procedure of the Citizens' Complaints Committee of USC also prescribe a form for submitting complaints, which was published in the Official Gazette of USC<sup>30</sup> to facilitate citizens in filing complaints, which likewise represents positive practice.

Regarding the number of complaints submitted by men and women, the records of the Committee for Public Complaints of USC do not exist.<sup>31</sup>

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<sup>28</sup> Data provided by the Committee for Public Complaints of Una-Sana Canton for the purpose of the research

<sup>29</sup> Law on Administrative Procedure of Federation of Bosnia and Herzegovina („Official Gazette of FBiH“, No. 2/1998, 48/1999, 61/2022), [ZAKON O UPRAVNOM POSTUPKU FBiH - Integralni](#), accessed: 7/1/2026

<sup>30</sup> Official Gazette of USC (Year XXI – Number 12, page 822), [599ab34ca13f8\\_12.pdf](#), accessed: 7/1/2026.

<sup>31</sup> Data provided by the Committee for Public Complaints of Una-Sana Canton for the purpose of the research

## Citizens' Complaint Committee of the Tuzla Canton

Ministry of Internal Affairs of the Tuzla Canton

Turailbegova bb

75 000 Tuzla

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[kontakt@mupkt.ba](mailto:kontakt@mupkt.ba)

In the territory of Tuzla Canton (TC), complaints filed against police officers of the Police Administration within the Ministry of Internal Affairs of Tuzla Canton (MIA TC) are received and processed by the Citizens' Complaints Committee (Committee).

The Committee was established by the Law on Internal Affairs of TC as a permanent working body within MIA TC and operates independently, not being part of the MIA command chain. The procedure for handling complaints, which includes forwarding complaints to the Professional Standards Unit of MIA TC, is regulated in a manner similar to the level of FBiH. It is important to note that the Law on Internal Affairs of TC provides for notifying the Citizens' Complaints Committee in the event of the transfer of an investigator from the Professional Standards Unit of MIA TC.

The Assembly of TC also adopted the Regulation on the Citizens' Complaints Committee of Tuzla Canton, which defines a complaint as any written or oral representation or grievance regarding the conduct, actions, and work of MIA TC employees, and may be submitted by:

- Citizens;
- An authorized representative on behalf of citizens;
- A superior in the form of a report on employee shortcomings and work results;
- A police officer or other employee against their superior or any other employee.<sup>32</sup>

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<sup>32</sup> Regulation on the Citizens' Complaints Committee of Tuzla Canton, („Official Gazette of TC“, number 10/11, 6/12, 9/17), [10 11 Uredba o Odboru za žalbe građana.pdf](#), accessed: 27/10/2025

This provision defines a broader range of individuals who can submit a complaint to the Committee, which is a result of the Committee's position as previously described. This represents a positive practice in terms of protecting the rights of both citizens and police officers, but it partially dilutes the Committee's authority, which may lead to overburdening its members.

Furthermore, the Regulation defines that MIA TC is obliged to provide office space and all other administrative and technical support, while the decision on compensation for work, i.e., its amount, is made by the Government of TC.<sup>33</sup>

The very fact that the resources necessary for the work of the Committee—which serves as a mechanism of external oversight of police officers—are provided by the Ministry within which the Police Administration, employing those same officers, operates, can be considered a problematic legal and sub-legal solution.

### **Structure of the Citizens' Complaints Committee of the Tuzla Canton**

The Committee consists of three members, one of whom is a civil servant from the Police Administration of MIA TC and cannot serve as the Chair of the Committee, while the other two members are representatives of citizens, who will not enter into an employment relationship with MIA TC. All members of the Committee must have at least a level VII education in the fields of law, criminology, security, economics, or other social sciences. They must also have at least seven years of work experience after obtaining a higher education degree. At least one member of the Committee must be a graduate lawyer. These conditions are special requirements for appointment, and in addition to them, members must also meet the general requirements for appointment.

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<sup>33</sup> Ibid.

Members of the Committee are appointed by the Commission for Selection and Appointment of the Assembly of TC, based on a public call conducted by MIA TC, which then prepares and submits a list to the said Commission. The list prepared by MIA TC must include at least two candidates for each position. The selection procedure is carried out in accordance with the provisions of the Law on Ministerial, Government, and Other Appointments of FBiH, except for matters regulated differently by the Law on Internal Affairs of TC. The mandate of the members of the Committee lasts four years and cannot be renewed, and the composition must reflect gender and national representation. It is important to note that the Commission for Selection and Appointment of the Assembly of TC dismisses members, or a member, of the Committee, in cases where they no longer meet one or more conditions prescribed for appointment. Members of the Committee and other interested parties notify the said Commission of all circumstances that may affect membership in the Committee.<sup>34</sup>

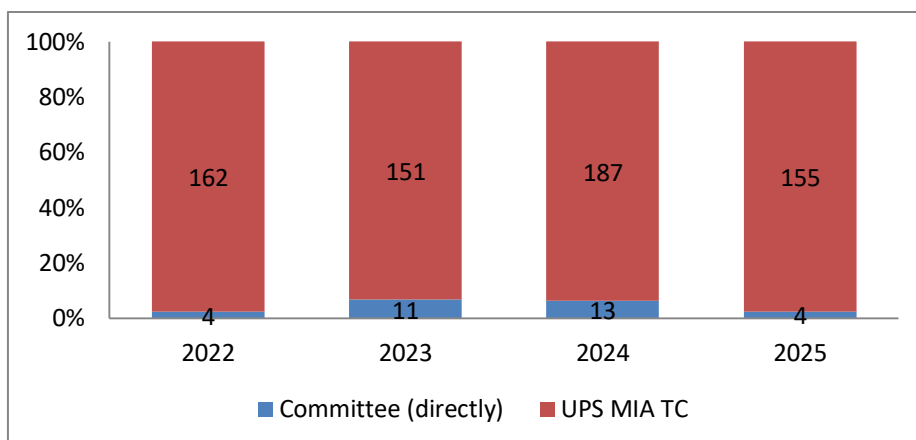
### **Work of the Citizens' Complaints Committee of the Tuzla Canton 2022. – 2025. Godine**

Below is a detailed analysis of the work of the Committee. The analysis is based on data provided by the Committee, relating to the period from 2022 to 2025, including a gender-based analysis.

During the given period, the Committee directly received a ***total of 32 complaints***. The reason for this statistic primarily lies in the position of the Committee, which was established within MIA TC, while committees in other cantons were formed as independent bodies within the assembly. Accordingly, the Professional Standards Unit of MIA TC, as the unit responsible for conducting internal proceedings on complaints, also receives complaints, ***totaling 655*** - a significantly higher number than the Committee.

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<sup>34</sup> Law on Internal Affairs of the Tuzla Canton („Official Gazette of the Tuzla Canton“, number: 4/10, 5/11, 14/11, 2/12, 8/13, 10/14, 9/15, 13/16, 14/17, 11/18, 14/18), [SluzbeneNovineTK 4-2010.indd](#), accessed: 27/10/2025

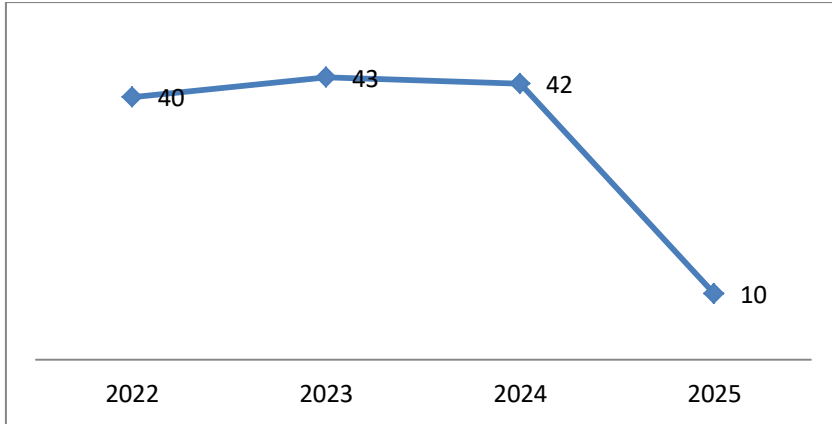


**Figure 8 - Comparison of complaints submitted directly to the Committee and to the Unit for Professional Standards; Note: data for 2025 reflects the period from 01.01.2025. to 31.10.2025.**

Regarding the gender-based analysis, during 2022, women filed 31% of complaints, and men filed 69%. In 2023, women filed 30% of complaints, and men filed 70%. During 2024, women filed 33% of complaints, and men filed 67%, and in the examined period of 2025, women filed 32% of complaints, and men filed 68%.<sup>35</sup> Thus, *throughout the entire examined period, women were the complainants in approximately 30% of cases, and men in approximately 70%*, with minimal percentage variations observed.

Of the total number of complaints submitted and reviewed, i.e., after internal and disciplinary proceedings were conducted, *135 sanctions were imposed on police officers in TC for minor or major breaches of official duty*. This represents the highest number of sanctions imposed compared to the reviewed committees.

<sup>35</sup> Data provided by the Citizens' Complaint Committee of the Tuzla Canton for the purpose of the research



**Figure 9 - Number of sanctions imposed for minor and major breaches of official duties by police officers; Note: data for 2025 reflects the period from 01.01.2025. to 31.10.2025.**

During the specified period, no complaints were submitted to the Citizens' Complaints Committee of TC for which the Committee was not competent.

## **Office for Public Complaints of the Zenica-Doboj Canton**

Assembly of Zenica-Doboj Canton

Kučukovići 2

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The Office for Public Complaints of Zenica-Doboj Canton (ZDC) is an independent body of the Assembly of ZDC. This Office is competent to receive, review, assess, and forward complaints regarding the work of police officers of the Police Administration within the Ministry of Internal Affairs of ZDC (MIA ZDC), submitted by citizens, legal entities, and other subjects. Furthermore, this Office is also competent for other tasks related to complaints and grievances about the work of police officers employed in MIA ZDC, as provided by the Law on Internal Affairs of ZDC. The Law mentioned also regulates the relationship between the Office and the Professional Standards Unit of MIA ZDC.

### **Structure of Office for Public Complaints of Zenica-Doboj Canton**

The Office consists of five members, one of whom serves as the Chair of the Office, and at least one member must be a graduate lawyer. The Chair and three members of the Office are representatives of citizens, while one member is a civil servant employed in MIA ZDC or the Police Administration within MIA ZDC. The Chair of the Office must have at least ten years of managerial work experience in legal affairs. Members of the Office are elected through a public call published in the Official Gazette of Zenica-Doboj Canton and in at least two daily newspapers distributed throughout the territory of BiH, for a mandate of four years, which may be renewed once consecutively.<sup>36</sup> This Regulation differs from the regulations

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<sup>36</sup> Law on Internal Affairs of Zenica-Doboj Canton („Official Gazette of Zenica-Doboj Canton“, number: 13/18, 6/19, 22/19, 21/20), [Zakon-o-unutrasnjim-poslovima-ZDK-NACRT-2018.pdf](#), accessed: 06.11.2025.

in the previously analyzed laws regulating this issue with regard to the possibility of mandate renewal.

As for the general and special requirements for the selection of Office members, they are identical to the requirements provided for the selection of members of the Citizens' Complaints Committees at other levels in BiH.

The composition of the Office reflects the national structure of the population in the territory of ZDC according to the 1991 census, while also respecting gender representation.<sup>37</sup>

### **Work of Office for Public Complaints of Zenica-Doboj Canton 2022. – 2025.**

Below is a detailed analysis of the work of the Office. The analysis is based on official reports for the relevant period published on the official website of the Assembly of ZDC, as well as on data provided by the Office, relating to the period from 2022 to 2025, including a gender-based analysis.

#### **2022. godina**

During 2022, the Office for Public Complaints of ZDC received a total of *125 complaints*<sup>38</sup>, which *7* were submitted directly to the Office - *4 by women and 3 by men*, while the remainder were received by the Professional Standards Unit or referred by other bodies not competent to act.<sup>39</sup>

The Office reviewed a total of 136 complaints during the year, as 11 complaints received in 2021 had not yet been resolved.

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<sup>37</sup> Ibid.

<sup>38</sup> Assembly of Zenica-Doboj Canton; Office for Public Complaints (2023): "Report on the work of Office for Public Complaints for 2022, [Izvještaj o radu Ured ZDK 2022.pdf](#), accessed: 8/1/2026

<sup>39</sup> Data provided by the Office for Public Complaints of Zenica-Doboj Canton for the purpose of the research

*Six complaints* were found to be *well-founded*, *three complaints* were *withdrawn*, and the *conclusion of one internal procedure* resulted in a *police officer being cleared of responsibility*.

Complaints from citizens, business entities, and other actors during 2022 mostly concerned irregularities in the work of police officers involved in traffic control and the prevention of public order disturbances, including biased conduct, unauthorized use of force, abuse of official position, and similar issues.<sup>40</sup>

In 2022, the Office for Public Complaints of ZDC did not dismiss any complaints due to procedural deficiencies upon submission, nor did it receive any complaints for which it was not competent.<sup>41</sup>

## 2023

During 2023, the Office for Public Complaints of ZDC received a total of *120 complaints*<sup>42</sup>, of which *3* were submitted directly to the Office. *All three of these complaints were submitted by men*. The remaining complaints were received by the Professional Standards Unit or referred by other bodies not competent to act.<sup>43</sup>

During the year, the Office reviewed a total of 131 complaints, as 11 complaints received in 2022 had not yet been resolved.

*Nine* complaints were assessed as *unfounded*, *nine* were found to be *well-founded*, and *one* complaint was *withdrawn*.<sup>44</sup>

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<sup>40</sup>Assembly of Zenica-Doboj Canton; Office for Public Complaints (2023): "Report on the work of Office for Public Complaints for 2022, [Izveštaj o radu Ured ZDK 2022.pdf](#), accessed: 8/1/2026

<sup>41</sup>Data provided by the Office for Public Complaints of Zenica-Doboj Canton for the purpose of the research

<sup>42</sup>Assembly of Zenica-Doboj Canton; Office for Public Complaints (2024): "Report on the work of Office for Public Complaints for 2023, [Izveštaj o radu Ured ZDK 2023.pdf](#), accessed: 9/1/2026

<sup>43</sup>Data provided by the Office for Public Complaints of Zenica-Doboj Canton for the purpose of the research

<sup>44</sup>Assembly of Zenica-Doboj Canton; Office for Public Complaints (2024): "Report on the work of Office for Public Complaints for 2023, [Izveštaj o radu Ured ZDK 2023.pdf](#), accessed: 9/1/2026

The reasons for complaints from citizens, business entities, and other actors for which the Office is competent were identical to those in 2022.<sup>45</sup>

In 2023, the Office for Public Complaints of ZDC did not dismiss any complaints due to procedural deficiencies upon submission, nor did it receive any complaints for which it was not competent.<sup>46</sup>

## 2024. godina

During 2024, the Office for Public Complaints of ZDC received a total of **116 complaints**<sup>47</sup>, of which **3** were submitted directly to the Office. **All three of these complaints were submitted by men.** The remaining complaints were received by the Professional Standards Unit or referred by other bodies not competent to act.<sup>48</sup>

During the year, the Office reviewed a total of 126 complaints, as 10 complaints received in 2023 had not yet been resolved.

**Nine** complaints were found to be well-founded, and **two** cases were assessed as **withdrawn complaints**.

The reasons for complaints from citizens, business entities, and other actors for which the Office for Public Complaints of ZDC is competent were identical to those in the previous two reviewed years.<sup>49</sup>

In 2024, the Office determined that it was **not competent to review one complaint**.<sup>50</sup>

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<sup>45</sup> Ibid

<sup>46</sup> Data provided by the Office for Public Complaints of Zenica-Doboj Canton for the purpose of the research

<sup>47</sup> Assembly of Zenica-Doboj Canton; Office for Public Complaints (2025): "Report on the work of Office for Public Complaints for 2024, [Izvještaj o radu Ured ZDK 2024.pdf](#), accessed: 9/1/2026

<sup>48</sup> Data provided by the Office for Public Complaints of Zenica-Doboj Canton for the purpose of the research

<sup>49</sup> Assembly of Zenica-Doboj Canton; Office for Public Complaints (2025): "Report on the work of Office for Public Complaints for 2024, [Izvještaj o radu Ured ZDK 2024.pdf](#), accessed: 9/1/2026

## 2025

Data collected through the research shows that the Office for Public Complaints of ZDC, during 2025 (as of 31 October 2025), received a **total of 7 complaints submitted directly to the Office**, of which **2 were submitted by women and 2 by men, and the remainder by other actors**. Of the total number of complaints, the Office **forwarded 6 complaints for further processing to the Professional Standards Unit**, and **1 complaint was forwarded to another body due to lack of jurisdiction**. According to the provided information, regarding the **complaints forwarded to Professional Standards Unit**, their handling **did not result in any sanctions against police officers for the given period**.<sup>51</sup>

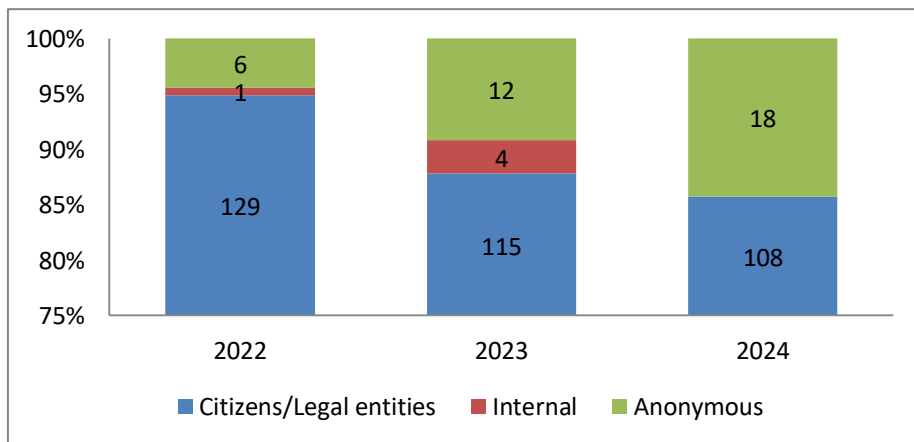


Figure 10 - Structure of complainants (2022-2024)

<sup>50</sup> Data provided by the Office for Public Complaints of Zenica-Doboj Canton for the purpose of the research

<sup>51</sup> Ibid.

## **Committee for Public Complaints of Assembly of Sarajevo Canton**

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In Sarajevo Canton, as an independent body of the Cantonal Assembly tasked with ensuring objective and impartial handling of complaints regarding the work and conduct of police officers, thereby protecting human rights and freedoms, the Committee for Public Complaints of the Cantonal Assembly of Sarajevo (Committee) has been established. The term “complaint” refers to requests, complaints, grievances, or other submissions related to improper conduct by police officers. The establishment, work, competencies, composition, and duties of the Committee, as well as the procedure for deciding on complaints, are defined by the Law on Internal Affairs of Sarajevo Canton. The Committee is competent to receive, review, assess, and forward complaints regarding the work of police officers of the Police Administration of the Ministry of Internal Affairs of Sarajevo Canton (MIA SC) submitted by citizens, legal entities, and other actors. In addition to other competencies defined by the Law, the Committee informs the public about its work, adopts its Rules of Procedure, and prepares and submits an annual report to the Cantonal Assembly. The Committee is appointed by the Cantonal Assembly upon the proposal of the Commission for Elections and Appointments of the Cantonal Assembly. The work of the Committee, including the procedure for forwarding complaints to the Professional Standards Unit of the Police Administration of MIA SC and the prescribed deadlines, is identical to the procedures carried out by other committees previously analyzed in the research.

### **Structure of Committee for Public Complaints of Assembly of Sarajevo Canton**

The Committee consists of five members who are representatives of the citizens. Regarding the general and special conditions for appointing members of the Committee, members must be citizens of BiH, over 18 years of age, must not be members or appointed officials of political parties, nor members of executive or legislative bodies at any level of government in BiH. In addition, no criminal proceedings may be pending against Committee members, they must not have been subjected to disciplinary sanctions for serious breaches of official duty, and they cannot be individuals who have been convicted of a criminal offense. Active police officers cannot be members of the Committee. The mandate of Committee members lasts four years, and members can be re-elected to the Committee only once consecutively. At least six months before the end of the mandate, the procedure for the election of a new Committee is initiated. The Law provides that the composition of the Committee reflects the national composition of the population in the territory covered by the Canton according to the 1991 population census, while also taking into account gender representation among Committee members.<sup>52</sup>

### **Work of Committee for Public Complaints of Assembly of Sarajevo Canton 2022. – 2025.**

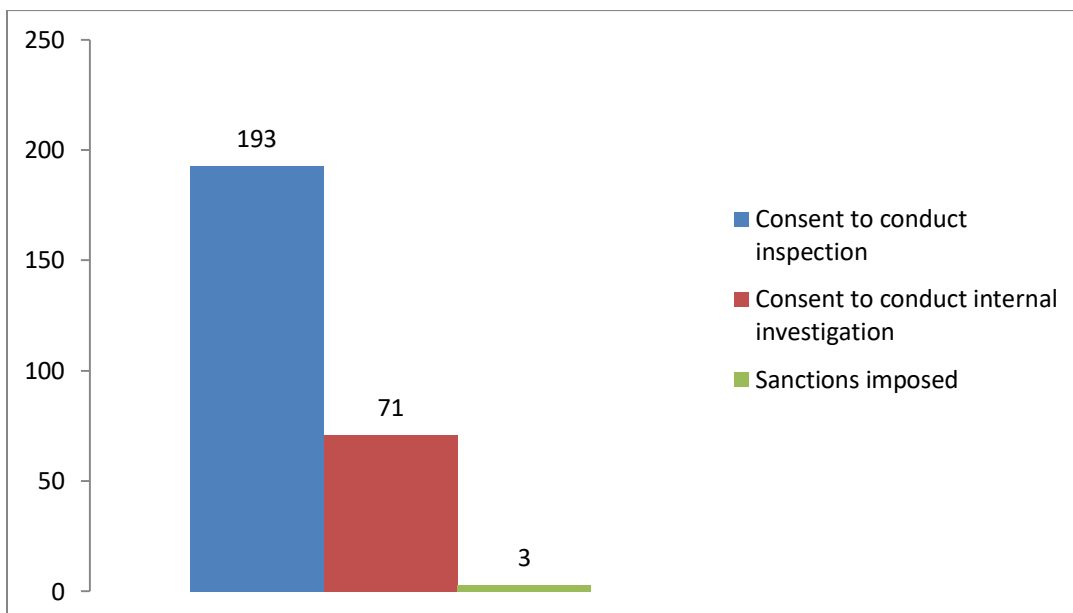
The following section presents a detailed analysis of the work of the Committee. The analysis is based on official reports for the relevant period published on the official website of the Assembly of KS, as well as on data provided by the Committee, covering the period from 2022 to 2025.

#### **2022**

During 2023, a total of **264 complaints** were submitted to and reviewed by the Committee for Public Complaints of the Sarajevo Canton Assembly.

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<sup>52</sup> Law on Internal Affairs of Sarajevo Canton („Official Gazette of Sarajevo Canton“, No. 1/2016, 6/2019 – authentic interpretation, 26/2019, 31/2019 and 39/2020), [Zakon o unutrašnjim poslovima Kantona Sarajevo - Paragraf Lex BA](#), accessed: 18/1/2026



**Figure 11 - Number of complaints reviewed and sanctions imposed in 2022**

Reports on internal investigations concluded with complaints being deemed justified show that in 1 case the report was submitted to the Police Commissioner for the imposition of a disciplinary sanction for a minor breach of duty, while in 15 cases an initiative to commence disciplinary proceedings was submitted to the disciplinary prosecutor of the Police Administration of MUP KS.

The Committee's 2022 report indicates that *126 internal investigations were conducted*, of which *16 complaints* were found *justified*, *37 complaints* were found *unjustified*, and *8 complaints* were *withdrawn*.

During 2022, citizens and other entities submitted the majority of complaints due to suspected unlawful, improper, or unprofessional conduct by police officers (87 complaints).<sup>53</sup>

*In 2022, 3% of complaints regarding the work of police officers of the Police Administration of MIA KS, submitted by citizens and other entities, were filed directly with the Committee for Public Complaints of the Sarajevo Canton Assembly.*

<sup>53</sup> Assembly of Sarajevo Canton; Committee for Public Complaints (2023): „Report on the Work of Committee for Public Complaints for 2022, [Izveštaj Odbor za žalbe javnosti KS 2022.pdf](#), accessed: 9/1/2026

During the given year, the Committee for Public Complaints of the Sarajevo Canton Assembly did not dismiss citizens' complaints regardless of how they were submitted, and all received complaints were considered, including anonymous submissions.<sup>54</sup>

## 2023

During 2023, a total of **242 complaints** were submitted to and reviewed by the Committee for Public Complaints of the Sarajevo Canton Assembly.

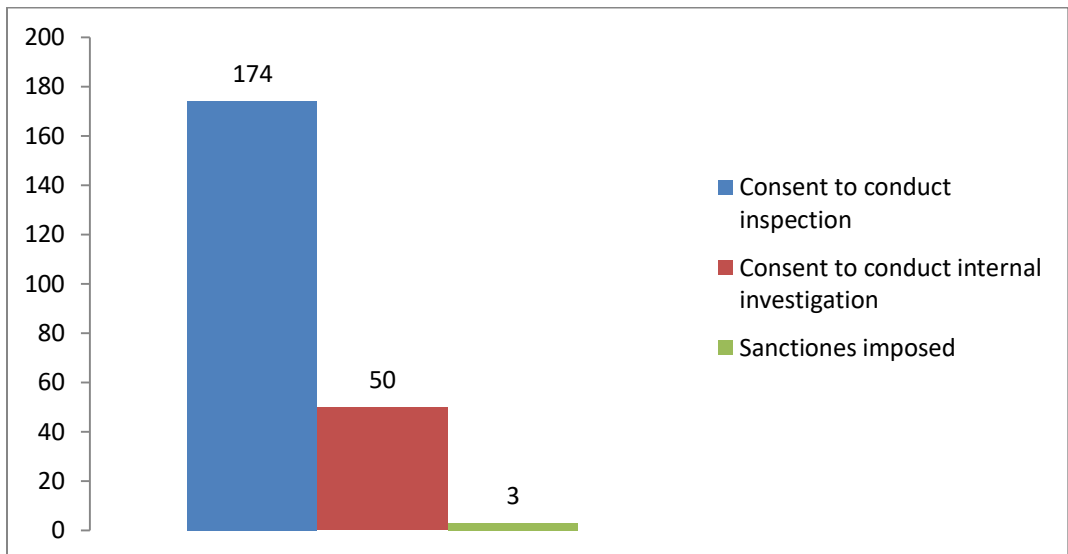


Figure 12 - Number of complaints reviewed and sanctions imposed in 2023

<sup>54</sup> Data provided by the Committee for Public Complaints of Assembly of Sarajevo Canton for the purpose of the research

According to the Committee's 2023 report, **72 internal investigations were conducted**, of which **12 complaints were found to be justified**, **25 complaints were found to be unfounded**, and **8 complaints were withdrawn**.

In 2022, citizens and other entities submitted the majority of complaints due to suspicions of unlawful, improper, or unprofessional conduct by police officers (83 complaints).<sup>55</sup>

In 2023, **6% of complaints regarding the work of police officers of the Police Administration of MIA KS were filed directly with the Committee for Public Complaints of the Sarajevo Canton Assembly**, representing an **increase of 3%** compared to the previous year.

During this period, the Committee for Public Complaints of the Sarajevo Canton Assembly did not dismiss any complaints regardless of how they were submitted, and all received complaints were reviewed, including anonymous submissions.<sup>56</sup>

## **2024**

During 2024, a total of **218 complaints** were submitted to and reviewed by the Committee for Public Complaints of the Sarajevo Canton Assembly. Authorization for checks was granted for **149 complaints**, and authorization for internal investigations was granted for **55 complaints**.

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<sup>55</sup>Assembly of Sarajevo Canton; Committee for Public Complaints (2024): „Report on the Work of Committee for Public Complaints for 2023, [Izvještaj Odbor za žalbe javnosti KS 2023.pdf](#), accessed: 9/1/2026

<sup>56</sup> Data provided by the Committee for Public Complaints of Assembly of Sarajevo Canton for the purpose of the research

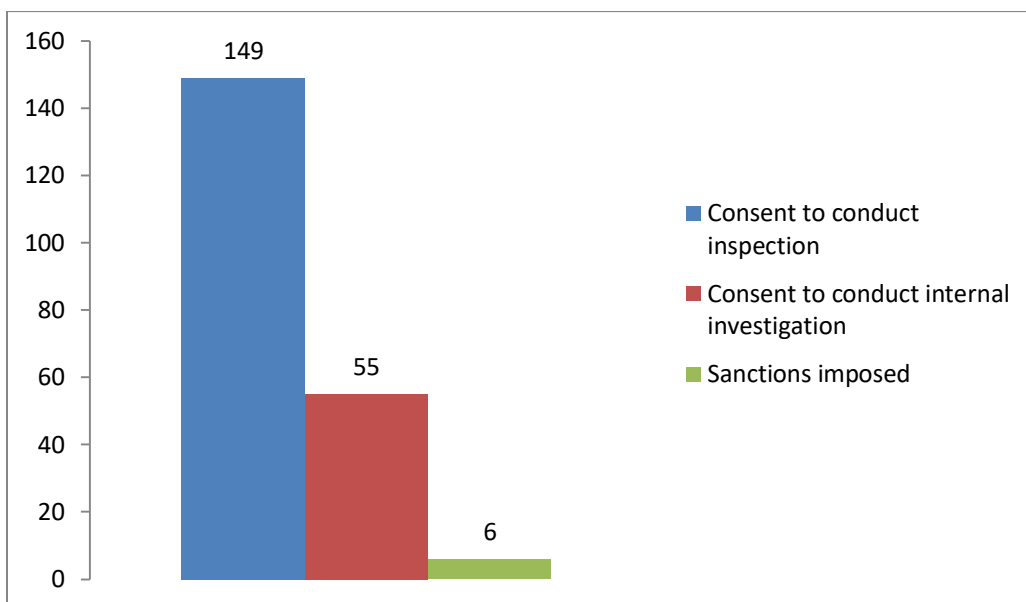


Figure 13 - Number of complaints reviewed and sanctions imposed in 2024

It is important to note that it was observed that the same citizen submitted seven separate written complaints regarding the conduct of police officers.

According to the Committee's 2024 report, *67 internal investigations were conducted*, of which *7 complaints were found to be justified*, *22 complaints were found to be unfounded*, and *10 complaints were withdrawn*.

In 2024, citizens and other entities submitted the majority of complaints due to suspicions of unlawful, improper, or unprofessional conduct by police officers (96 complaints).<sup>57</sup>

Thus, in 2024, *2% of complaints against police officers of the Police Administration of the MUP KS submitted by citizens and other entities were filed directly with the Committee for Public Complaints of the Sarajevo Canton Assembly*, representing a *decrease of 4%* compared to the previous year.

<sup>57</sup>Assembly of Sarajevo Canton; Committee for Public Complaints (2025): „Report on the Work of Committee for Public Complaints for 2024, [Izveštaj Odbor za žalbe javnosti KS 2024.pdf](#), pristupljeno 9/1/2026

During the same year, the Committee for Public Complaints of the Sarajevo Canton Assembly did not dismiss any complaints from citizens regardless of how they were submitted, and all received complaints were reviewed, including anonymous submissions.<sup>58</sup>

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<sup>58</sup> Data provided by the Committee for Public Complaints of Assembly of Sarajevo Canton for the purpose of the research

## Synthesis of Certain Findings and Concluding Considerations

Citizen complaint committees in BiH function as a mechanism of civil oversight over the handling of complaints from citizens regarding the conduct of police officers. Of the six committees examined in this research, only one committee operates within the ministry of internal affairs, while all others have been established as independent bodies of assemblies at various levels of government. The status of a committee as an autonomous supervisory body, fully formally and physically separated from the ministry and police administration whose officers are subject to complaints, represents a more transparent approach compared to a committee operating within the ministry itself.

In this context, it is particularly important to consider the functioning of committees at the state level, given the breadth of their competencies.

The State-level Committee for Public Complaints reviewing complaints against police officers of three agencies (State Investigation and Protection Agency (SIPA), Border Police of BiH (BP BiH), and the Directorate for Coordination of Police Bodies of BiH (DKPT)) is the Committee for Public Complaints on the Work of Police Officers in BiH Police Bodies. The work of this committee is complex due to the number of agencies under its jurisdiction. Research results show that the majority of complaints received by this committee relate to the work of BP BiH officers. This statistic reflects the BP BiH's responsibilities and the constant interaction of its officers with passengers. Although the number of complaints is high, only a small number were found to be substantiated. ***Over a four-year period, a total of 451 complaints were submitted regarding the work of police officers in BiH police bodies, of which 26 were found to be justified, and six officers either faced sanctions or were suspended pending the conclusion of internal or disciplinary proceedings.*** This indicates a distinct lack of public knowledge regarding police powers and conditions for their application. There were also cases in which citizens' complaints were motivated by personal conflicts with specific officers.

In contrast to the state level, the situation at the entity level of the Federation of BiH can be considered alarming, given the multi-year dysfunction of the Committee.

Specifically, the Law on Internal Affairs of the Federation of BiH provides for a Citizen Complaint Committee of the Parliament of FBiH. However,

*although formally established, this committee has not been active since 2022*, when, following a canceled public competition for the selection of committee members, no new competition was conducted. This oversight left citizens of FBiH without one of the most important mechanisms of civil oversight over the police. A new competition for the appointment of this committee was announced in August 2025, and if both houses of the FBiH Parliament approve the appointments of the selected members, citizens will again have access to this protective mechanism after four years.

At the cantonal level, committees operate with varying results and challenges in practice.

*In the Una-Sana Canton, citizens submitted 185 complaints*, and following internal and disciplinary proceedings, *one sanction was issued for a minor violation of official duty*. A similarly *small number of complaints were found to be substantiated*. In this canton, strict legal provisions were observed regarding special conditions for appointing committee members, including requirements for the chairman to have ten years of experience as a judge, prosecutor, or in legal work within public service. While this approach ensures high credibility and expertise of the chairman, it can limit the pool of potential candidates, especially since the four-year mandate of committee members cannot be extended. This limitation, however, has a positive aspect, as periodic changes and new members enhance the independence and autonomy of the committee's work.

A specific example of an organizational model is Tuzla Canton, where the committee is established within the executive branch.

The Citizens' Complaint Committee of Tuzla Canton is part of the MUP TC. Research shows that *of a total of 687 complaints concerning police officers in Tuzla Canton, only 5% were submitted directly to the committee*. This is not inherently problematic, as all complaints received by the Ministry, the Professional Standards Unit, or other bodies are adequately processed. However, this statistic indicates the level of public awareness regarding the existence and functioning of such bodies. One factor influencing this is that the committee operates within the Ministry. It is also important to note that committee members are appointed by the Cantonal Assembly following a public competition conducted by MUP TC, highlighting a significant link between the committee and the ministry it oversees. Additionally, one committee member is a civil servant of the Police Administration within MUP TK; although not the chairman or an authorized official, public perception of this arrangement can be negative. Formal and physical

separation of the committee from the MIA is a positive practice that can increase public trust in mechanisms designed to protect them. A positive practice observed in TK is the notification of the committee in the event of the transfer of investigators from the Professional Standards Unit, which demonstrates proactive and efficient collaboration that enhances effectiveness.

A similar but institutionally distinct mechanism functions in Zenica-Doboj Canton.

Within the Assembly of Zeničko-dobojski Canton, the Office for Public Complaints operates as a separate body. Although independent of the Ministry of Internal Affairs, *citizens submit an average of 4% of complaints directly to the Office annually. Of the 361 complaints reviewed during the research period, only 15 were found to be justified*, again reflecting limited public knowledge of police powers and conditions for their application. This issue is exacerbated by the insufficient number of public awareness campaigns educating citizens, which could positively impact trust in the police.

It is particularly important to consider the situation in the most populous canton, where a higher number of complaints is expected.

*The Committee for Public Complaints of the Sarajevo Canton Assembly received and reviewed a total of 724 complaints during the period 2022–2025, with an average of 4% of complaints submitted directly to the Committee.* Of the total complaints reviewed, 265 internal investigations were conducted, 35 complaints were found to be justified, and 14 police officers faced sanctions for minor or serious violations of official duties.

Citizen complaint committees are an extremely important mechanism for the protection of human rights and freedoms, for civil and parliamentary oversight of police work, and for the professionalization of police officers. The proper functioning of these bodies ensures high standards of policing, careful application of police powers, and a sense of security among citizens, who can be confident that any overreach or abuse of authority is addressed by an impartial institutional mechanism. Therefore, it is crucial to raise public awareness of the existence and work of citizen complaint committees in BiH, as well as to educate citizens about the conditions for the application of police powers by officers. In this way, it is possible to establish a relationship of mutual understanding, upon which a progressive and safe society can be built.

## Suggestions:

- **Standardization of the organizational form of citizen complaint committees:**

Standardizing the organizational form of citizen complaint committees is a key prerequisite for strengthening their institutional independence and credibility. Different organizational models, ranging from independent parliamentary bodies to structures embedded within ministries of interior, lead to inconsistent work standards and varied public perceptions of their autonomy. Standardizing the organizational model, following the example of committees functioning as independent legislative bodies, could contribute to greater transparency and increased citizen trust in these oversight mechanisms.

- **Strengthening powers and reducing institutional dependence of committees:**

Limited powers of citizen complaint committees significantly reduce the scope of their effectiveness. Their dependence on internal controls and professional standards units within the Ministries of Interior, along with the lack of ability to conduct independent investigations, hinders effective handling of complaints. While cooperation with internal control units is necessary, clearly defined procedures that reduce institutional dependence would allow greater autonomy of the committees and stronger citizen trust in institutions.

- **Establishment of clear and standardized procedures for handling complaints:** The inconsistency of procedures for handling complaints at different levels of government creates legal uncertainty and unequal treatment of citizens. Establishing clearly defined and standardized procedures would contribute to more efficient committee operations, greater predictability of processes, and more consistent protection of citizens' rights.

- **Intensifying citizen information and education on the existence of committees:**

Research results indicate a low level of public awareness regarding the existence and competencies of citizen complaint committees. The fact that only a small percentage of complaints are submitted directly to these bodies highlights the need for systematic and continuous public information campaigns. Regular campaigns through media, public presentations, and digital platforms could significantly improve citizens' understanding of their rights and available protection mechanisms.

- **Development of a proactive approach in promoting complaint mechanisms:**

Experiences from pilot activities and promotional campaigns in certain cantons show that proactive citizen information has a positive impact on the quality and justification of submitted complaints. This approach would not only serve as a preventive function but also contribute to strengthening institutional credibility through transparent promotion of accountability and oversight mechanisms over police work.

- **Improvement of expertise and continuous education of committee members:**

The quality of committee work largely depends on the expertise and competencies of its members. While high professional criteria, such as long-term experience in the judiciary or civil service, enhance the seriousness of the work, they may limit the pool of potential candidates. It is essential to ensure continuous education of committee members and to find a balance between high criteria and some flexibility in their selection.

- **Ensuring continuity of work and preventing institutional gaps:**

Institutional gaps in committee operations, resulting from delays in appointing members, as seen in the FBiH example, can negatively affect efficiency and citizen trust.

- **Introducing a gender-sensitive and inclusive approach in committee work and promotion:**

Gender analysis of submitted complaints indicates significant differences in the use of protection mechanisms between men and women. This data points to the need for tailored educational activities and promotional campaigns aimed at different demographic groups to ensure equal access to protection mechanisms for all citizens.

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