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FROM VICTIM BLAMING TO VICTIM SENSITIVITY

A State of the Art Analysis of
Domestic and Gender-Based Violence
in Bulgaria

2022

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This report is the first piloting of a new policy bespoke tool - the Methodology for Monitoring Policy and Institutional Practice in Relation to Domestic and Gender-Based Violence. The Methodology provides a blueprint for the recurring evaluation of key areas of interest in the realm of this type of violence on a national level.

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List of Abbreviations

CC	Criminal Code
CEDAW	Convention on the elimination of all forms of discrimination against women
CivPC	Civil Procedure Code
CLB	Children left behind
CoE	Council of Europe
CPC	Criminal Procedure Code
CPD	Commission for Protection against Discrimination
DGBV	Domestic and gender-based violence
DV	Domestic violence
EU	European Union
FG1-10	Focus group 1-10
GBV	Gender-based violence
GD-COC	General Directorate for Combatting Organised Crime of the Ministry of Interior
I1-16	Interview 1-16
ICT	Information and Communications Technology
IPV	Intimate partner violence
LGBTI+	Lesbian, gay, bisexual, transsexual, intersex and others' community
MLSP	Ministry of Labour and Social Policy
Mol	Ministry of Interior
NGO	Non-governmental organisation
NIJ	National Institute of Justice
NPPPDV	National Programme for Prevention and Protection against Domestic Violence
OSCE	Organisation for Security and Cooperation in Europe
PDA	Protection against Discrimination Act
PDVA	Protection against Domestic Violence Act
SDG	Sustainable Development Goals
SFCVCA	Support and Financial Compensation for Victims of Crime Act
UN	United Nations
UNGA	United Nations General Assembly
UNICEF	United Nations International Children's Emergency Fund

Executive Summary

This report aims to reflect on the state of play in relation to domestic and gender-based violence (DGBV) in Bulgaria for the period 2020-2021, and move policy makers towards progressive action to prevent and combat violence. The report is the first piloting of a bespoke methodological tool - the Methodology for Monitoring Policy and Institutional Practice in Relation to Domestic and Gender-Based Violence in Bulgaria – which provides a blueprint for the recurring evaluation of key areas of interest in the realm of DGBV on a national level.

The present report is built upon information sourced through desk-research, targeted information requests, and focus groups and interviews with practitioners and first-line responders working on DGBV cases in ten municipalities in Bulgaria. The structure follows the layout of the Monitoring Methodology indicators, divided in seven primary and three additional thematic areas: general legislative and policy measures, prevention, protection, prosecution and punishment, reparations, coordination, monitoring and data collection, international cooperation, discrimination, intersectional vulnerabilities, and new types of DGBV. Thematic immersive content analysis is utilised as a method for assessing the focus group and interview qualitative data.

On the basis of the wide spectrum of data collected, the substantive sections of the report offer critical reflections upon major challenges and setbacks, emphasising the necessity of targeted action at both national and local levels: from setting up a centralised register of domestic violence cases and introducing the notion of „gender-based violence“ in the legislation, to boosting preventative action, enhancing crisis services and creating programmes for perpetrator rehabilitation. Notable deficiencies in policies and institutional practice were identified in all thematic areas, pointing to the importance of effectively introducing and perseveringly implementing a holistic approach to preventing and combatting DGBV, similarly to the frameworks supported by both General Recommendation 35 of the CEDAW Committee, and the Council of Europe Convention on preventing and combating violence against women and domestic violence.

1. Introduction

Despite the international and national criticism of Bulgaria's failure to ratify the *Council of Europe Convention on preventing and combating violence against women and domestic violence* (the Istanbul Convention), the country is still struggling to adopt adequate and comprehensive measures to counter gender-based violence (GBV) and violence against women. Society as a whole continues to fail to grasp the seriousness of these phenomena and must become more vocal in denouncing them. Two seemingly unrelated events demonstrate how essential government response and public outcry are. In October 2021, a decision of the Bulgarian Constitutional Court extinguished the voices of those calling for the unqualified adoption of the Istanbul Convention's provisions, while becoming a potentially devastating spark in the eyes of radical, populist, and extremist groups that oppose the document. In this recent interpretation of the Constitution, the Constitutional Court (2021) affirmed that there could only be a purist definition of "biological sex", thus refuting the idea that gender as a social construct could have significance in the national legislation. Just a few days later, a group led by the 2021 presidential candidate and right-wing nationalist, Boyan Rasate, attacked and caused material damage to a LGBTI+ community centre in Sofia (Radio Free Europe, 2021).

Raising public awareness about the gravity of GBV, domestic violence (DV), hate crime, hate speech, cyber bullying and taking pertinent policy action is imperative. To increase the chances for success of such measures, campaigns, activities, policy and decision-makers, activists, experts, and frontline workers must be aware of the scope of the problem under investigation, as well as of the specific challenges associated with its countering at any given moment. The present report is an attempt to provide such an account following the pilot application of the *Methodology for monitoring policy and institutional practice in relation to domestic and gender-based violence in Bulgaria* (the Monitoring Methodology). It is the result of a two-year effort to uncover the needs of the professionals who battle DGBV every day and to identify those perceptions and practices that could be replicated to improve counter-DGBV efforts, but also those that need to be abandoned forever.

2. Methodology

2.1 Aim and Structure

The Methodology¹ underpinning the present report has the goal of enabling interested parties to undertake recurring observation and assessment of the legal, policy and institutional environment in Bulgaria in the thematic area of DGBV. When implemented thoroughly, the Methodology can provide insight for the development and amendment of laws, policies, strategic documents, and internal institutional regulations, bringing about progressive change for both victims and perpetrators of DGBV. Essentially, the Methodology has the following aims:

- ▶ To demonstrate what concrete legal, strategic, and policy measures are in place to counter the phenomenon of DGBV, and more specifically, Intimate Partner Violence (IPV) in Bulgaria, and to explore if and how these measures are being put into practice, implemented and evaluated;
- ▶ From this, to present, put into context, and attempt to interpret data and statistics, which are being collected with respect to IPV;
- ▶ And, ultimately, to identify, delineate and describe clearly existing challenges and key areas for improvement where additional legislative, strategic, and policy efforts are needed.

The Methodology further provides details on the specific approach taken in line with the key aims, the beneficiaries of the instrument, the design and structure of the monitoring process, the crucial definitions of the phenomena in question (GBV, including such against women, DV, IPV and so on), and a schematic representation of the research focus of the Methodology. Furthermore, the instrument assists in positioning the monitoring exercise in the Bulgarian context, offering brief preliminary reflections on foundational laws and policies, DGBV problematics, available definitions, etc. The process of monitoring itself is based on three levels of analysis (assessment of policies, assessment of outputs and outcomes, and overall assessment) structured in seven primary thematic areas (General legislative and policy measures, Prevention, Protection, Prosecution and punishment, Reparations, Coordination, monitoring and data collection and International cooperation), and three supplementary thematic areas (Intersectional Vulnerabilities, Discrimination, and New Types of DGBV), reflecting the categorization prevalent in international DGBV instruments, such as the Istanbul Convention and General Recommendation 35 of the CEDAW Committee. In each of the categories mentioned, specialized primary and secondary qualitative indicators and additional quantitative indicators assist Methodology users in formulating their particular pathways to data collection and analysis. The indicators are intentionally open-ended, comprehensive, and non-exhaustive, as to allow

¹ It is available as a separate instrument: see, Tsvetkova, G., Kuneva, L., and Yakova, L., 2022.

the development of the Methodology in the future and foster its application in adjacent IPV thematic foci. Each indicator is followed by a clarification, explaining the purpose and content of the corresponding information sought through and by the specific indicator.

Implementing the Methodology requires reliance on both primary and secondary sources of information, and both qualitative and quantitative data. The approach taken is conducive to a plethora of data collection methods – desk research, information requests, focus groups and interviews (this direction is pursued in the present case), institutional observation, surveys, guided questionnaires, etc. Importantly, even when the objective situation (i.e. the contents of laws, policies and other documents) can be established via desk research and information requests, focus groups and interviews must be performed as they throw light upon respondents’ understanding of the objective situation (e.g. how they interpret a legal provision, or how they implement a certain policy measure). A classification of primary and secondary sources is also made available, alongside an elaboration of the proposed method of data collection. Furthermore, the Methodology enshrines the basic principles of results analysis, reporting and recommendations formulations, the latter of which are included in this report, and in a separate Policy Brief. The gathered data is analysed using the parallel method, where data sets collected through a mix of methods (quantitative and qualitative) are analysed independently and the findings are then combined or integrated. Final remarks on validity and reliability, limitations, contents of the report, challenges and solutions are also included in the final chapters of the Methodology.

The Methodology is to be applied regularly (for instance, annually), which will enable recurrent data collection efforts and the production of periodic monitoring reports. Eventually, this will allow for comparison of data across different time periods, the offering of more exhaustive analyses, and the formulation of more pertinent policy recommendations.

2.2 Pilot Application

The piloting of the Methodology unfolded in the following stages:

- ▶ Firstly, the researchers conducted preliminary desk research, including identifying and summarising key legal, policy and institutional documents and practices, and gathering information from national, international and non-governmental sources for the identification of the problematics of DGBV in Bulgaria.
- ▶ As a second step, information requests were sent to 573 stakeholders in Bulgaria, of which 450 (four hundred fifty) institutions², 39 (thirty nine) non-governmental actors, as well as media, hospitals and emergency care centres in 28 districts in Bulgaria. The requests inquired about DGBV statistics collected by those bodies and organisations, as well as their knowledge, experiences, and opinions of the phenomenon. Out of the contacted institutions, 84 (14.6%) returned replies – via a letter or a phone call. None of the contacted NGOs sent a written reply – however, they were well-represented during a stakeholder meeting in March 2021 where they discussed a draft of the Monitoring Methodology, on which the present Monitoring Report is based.
- ▶ Thirdly, 10 in-person focus groups with relevant stakeholders (see Appendix I of the Methodology) were carried out in Blagoevgrad, Burgas, Varna, Veliko Tarnovo, Vidin, Kardzhali, Pazardzhik, Pernik, Ruse, and Samokov³, following the guidelines set out in Appendix IV of the Methodology. Finally, 17 (seventeen) interviews with experts, practitioners, and first-line responders were carried out to supplement and enrich the data collected during the previous stages, following the guidelines laid out in Appendix III of the Methodology. The desk research and information requests data were thematically categorized and are presented in Section 4.1 of the present report. The focus group and interview data were anonymised, coded, categorized, thematically organised, and interpreted in line with the analytical approach proposed in the Methodology, and are presented in the ten thematic categories in Section 4.2 of the present report, where brief assessments on each of the primary and secondary qualitative indicators is also given in a table format. Finally, the report offers a snapshot of the good practices and areas for improvement, based on the entirety of the data collected, in Section 3.

² These include ministries, commissions, agencies, municipal administrations, district administrations, and regional directorates of the Mol, district prosecutors' offices, regional and district courts, regional directorates of education.

³ The Bulgarian capital, Sofia, was not among the towns where focus groups and interviews took place for three reasons. Firstly, the project partners decided it might be beneficial for the analysis to invite specialists that are not based in Sofia, where usually most of the activities, projects, and initiatives are focused. Secondly, the towns were selected considering the strength of the local network and the contacts of the team responsible for performing the fieldwork. This proved to be essential as many practitioners were hesitant to participate in the focus groups and the interviews. In addition, organising a focus group in Sofia was made more difficult by the ongoing COVID-19 pandemic and the fact that in 2021 national parliamentary elections were held three times.

Certain limitations with respect to the piloting must be noted. Firstly, the piloting could not encompass all districts and municipalities in Bulgaria. Future utilisations of the Monitoring Methodology, followed by the preparation of a Monitoring Report, in a specific municipality (for instance, one identified as an interesting case by means of preliminary desk research) could yield new insights and uncover new challenges, best practices or areas where urgent action is needed. Secondly, the authors realise that some focus groups and interviews could have benefitted from the inclusion of more diverse categories of stakeholders. Unfortunately, the COVID-19 situation in Bulgaria during the period during which the fieldwork was implemented proved to be a considerable hinder to successfully and safely engaging all relevant stakeholders. Therefore, future applications of the Methodology should allow even more time for inviting potential participants, as well as involve strategising about more concerted efforts to ensure the engagement of certain actors.

2.3 Ethics

During the piloting of the Methodology, ethics- and confidentiality-related rules set in the Monitoring Methodology were strictly complied with. Thus, following the preferences of the respondents, the focus group discussions were not audio recorded. The purpose of the fieldwork and the overall project objectives were clarified by the facilitators/ interviewers in great detail. The respondents were presented with consent forms, which clearly state that participation in focus groups and interviews is completely voluntary.

The experts were informed that the insights and experiences they shared during the fieldwork will be analysed to complete the present Monitoring Report and the separate Policy Brief accompanying it. However, a strict approach to confidentiality and anonymisation is employed, as to effectively safeguard the identities of participants, and allow them the confidence of sharing their genuine opinions. Anonymity is guaranteed by assigning random numbers to focus groups and interviews, whilst participant names were not recorded in the transcripts.

It did not come to the knowledge of the team applying the methodology and conducting the fieldwork that any of the respondents had been a victim of violence. As per the initial design, the focus groups and the interviews were planned to engage practitioners and institution representatives and not victims of DGBV.

3. Good Practices and Areas for Improvement

Good Practices

1. SUPPORTING CRISIS CENTRES

State and municipal support for crisis services was identified as a factor for the full-bodied provision of victim protection and rehabilitation. Funding, as well as methodological support, are recognised good practices, enabling sustainable services and longer-term care.

2. CRIMINALISATION OF SEVERE TYPES OF DOMESTIC VIOLENCE

As of 2019, changes in the Criminal Code introduced domestic violence as an aggravating circumstance in some serious offences such as murder, grievous bodily harm, kidnapping, and unlawful deprivation of liberty. The process of DV criminalisation, as recommended by many international organisations, must be continued by eliminating the „systemic violence“ requirement in CC Art. 93 (31), and expanding the types of DV (and GBV) that entail lawful punishment.

3. MANDATORY DV TRAINING FOR MAGISTRATES, NIJ

The implementation of recurrent mandatory training for magistrates by the National Institute for Justice was identified as a good practice. The availability of mandatory key professionals' training is interrelated with better prevention and protection from DGBV. 4. Supporting Crisis Centres State and municipal support for crisis services was identified as a factor for the full-bodied provision of victim protection and rehabilitation. Funding, as well as methodological support, are recognised good practices, enabling sustainable services and longer-term care.

4. DISTRICT COUNCIL FOR THE PREVENTION OF DOMESTIC VIOLENCE, RAZGRAD (BULGARIA)

The Council was established in 2016 to function as a coordination and cooperation forum, set goals, report on actions taken, disseminate tasks, and collect relevant data. As the desk research and fieldwork point out, locallevel mobilisation is key to comprehensively addressing victims' needs in a timely and adequate manner.

Areas for Improvement

1. PREVENTION AND AWARENESS-RAISING

The desk research and fieldwork show that lack of awareness of what DGBV entails leads to poor reporting by victims and poor recognition by professionals. Awareness-raising campaigns and capacity-building for front-liners are urgently necessary.

2. CRISIS, CONSULTATION, PROTECTION AND REHABILITATION SERVICES

Crisis and consultation centres, providing services for protection and rehabilitation of victims are critically insufficient, leading to challenges for both victims and professionals. Enhanced victimsensitive service provision both during and after a crisis are a fundamental area where immediate positive action is required.

3. WORKING WITH PERPETRATORS

Working with perpetrators remains an underdeveloped area. Relevant legislation speaks of perpetrator rehabilitation, yet actual services are far and far between, and their provision often poses an additional risk to victims (victim and perpetrator services in the same place). Specialised centres for perpetrators ought to be created to combat re-offending and recurring violent behaviour.

4. DATA COLLECTION, MONITORING AND REPORTING

Data on domestic violence remain a primary concern. Available statistics are often piece-meal, incomplete, temporally and geographically uneven, and generally incomparable for the purposes of research or the formulation of informed policies. A register of perpetrators and victims, as well as at least annual publication of comprehensive statistics, inclusive of sufficient disaggregation, are necessary.

5. COORDINATION AND COOPERATION

The practices, areas and problematics identified here are based on data collected through desk research, information requests, focus groups, and interviews. Institutional coordination and cooperation in cases of domestic and gender-based violence must be introduced into the legislation in a similar manner to such mechanisms related to children and victims of human trafficking. Cooperation and information flow between institutions and NGOs should also be regulated more fully, and task dissemination must be clarified.

6. INTRODUCING GBV INTO THE LEGISLATION

Work on domestic violence without concomitant work on gender-based violence leads to inadequate and insufficient prevention and protection. Introducing GBV into the legislation equates to better prevention and more victims seeking and receiving help.

** The practices, areas and problematics identified here are based on data collected through desk research, information requests, focus groups, and interviews.*

4. Victims, Witnesses, Perpetrators: an Analysis

4.1 The Silence of Statistics

Prior to the focus groups and in-depth interviews, preliminary desk research was performed and requests for information about DGBV were sent to relevant Bulgarian institutions and civil society organisations. For the most part, the results of the preliminary desk research were compiled into a document entitled *Overview of the Legal, Strategic and Institutional Framework Related to Domestic and Gender-Based Violence in Bulgaria*. Desk research findings were also relied upon when finalizing the present analysis as they complement and explain some statements and observations made by the focus group participants and the interviewees.

As noted above, 573 written requests for information were sent to relevant stakeholders in the country. At the national level, these included relevant ministries, agencies, national committees and councils within the Council of Ministers, as well as other public bodies such as the Ombudsman of the Republic of Bulgaria and the Commission for Protection against Discrimination. In addition, authorities potentially implementing counter-DGBV activities in all Bulgarian regions (28) and municipalities (266) were contacted, requesting information on their affairs in this thematic area. Among those contacted were district and regional courts, healthcare facilities, social assistance directorates, regional directorates of the MoI, district prosecutor's offices, municipal governance structures, etc. Requests for information were sent to social services providers and civil society organisations working on the topic of GBV, DV, women's rights and human trafficking⁴.

The stakeholders identified above were asked to provide available statistics (for the latest year they were gathered in full), as well as detailed information about any strategic and policy documents and legislation on DGBV – be they published or unpublished, adopted or in preparation. While the response rate (16%) can be described as low, the exact reasons for this are difficult to pinpoint and could be related to the de-prioritisation of DGBV among institutions in Bulgaria, the relative “newness” of the phenomenon or the absence of concrete knowledge on the topic of stakeholders approaches, as well as the lack of sufficient time and resources to commit during the summer months, relevant data collected, or a more in-depth understanding about the role of one's institution in counter-DGBV efforts. Following the future applications of the monitoring methodology, and especially if the response rate remains low, the reasons for this should be explored more thoroughly by the team applying the Methodology.

⁴ A detailed list of the addressees of the information requests is attached to this Monitoring Report, as an Annex.

The received written responses to information requests allow us to pinpoint the following important observations, which are further elaborated upon in the subsequent analysis of focus group discussions and interviews, as these support the said findings.

► **National-level institutions.** One of the contacted institutions – the Social Assistance Agency – shared detailed information regarding the Bulgarian regulatory framework for responding to DV and GBV, specifying that at the district level it is up to the MoI's Regional Directorates and Regional Directorates for Social Assistance to cooperate and refer victims to the necessary social services. For the most part, the institution's reply focuses on violence against children, including early marriages. However, according to the collected data in 2020, 594 victims of DV were identified, among whom 425 were children (not disaggregated by sex), 161 were women, and eight were men. Of these, 11 victims were people with disabilities, but no sex-disaggregation was made. The written response of the Prosecutor General's Office concentrates on the responsibilities, authorities, and competences of the institution laid out in internal orders and instructions. No statistics are available on crimes related to DV (all relevant articles of the Criminal Code (CC) are duly noted), as these concern aggravated crimes, which are regulated under separate subparagraphs of relevant articles of the CC, where statistics are only collected by article. The letter provides valuable information that the Prosecutor's Office regularly organises trainings for investigators and prosecutors – in 2020, three trainings involving 33 prosecutors took place. No reply was received from the MoI, a structure that could potentially provide crucial data on reported DV, police visits pursuant to reports of DV, warning protocols ("police warning"), DV perpetrators brought into custody, breaches of Protection against Domestic Violence Act (PDVA) Protection Orders (CC Art. 296), and so on. However, on the institution's website one can find information about the work of the National Coordinator on Domestic Violence and various initiatives, projects, and trainings in which the ministry's employees take part, as well as yearly and quarterly police statistics bulletins (the latter provide some data, albeit not very detailed, about criminal offenses committed in the context of DV).⁵ Notably, the Supreme Judicial Council published comprehensive annual and biannual statistics on the activities of the judiciary (Supreme Judicial Council, n.d.), a small part of which is relevant to the present study. In 2020, the courts had 4057 cases pursuant to provisions of the PDVA to decide upon, 3253 of which were initiated in 2020, and 882 remained open at the end of the year. Of the 3,175 closed cases, 1,258 (39.6%) claims were satisfied (fully or partially), 339 (10.7%) claims were rejected and 1,578 (49.7%) cases were terminated.

Unfortunately, there is still a lack of comprehensive and easily accessible data on cases (here, occurrences) of DV and related criminal court proceedings. Even if some data are available (e.g. PDVA civil cases), they are not disaggregated by key demographic traits such as sex, age, district, municipality, ethnicity, ability, etc. It was not possible to establish whether the Ministry of Interior (MoI) comprehensively collects data on reports and

⁵ For instance, for 2020, the numbers are: 606 registered criminal offences, 330 crimes solved, 187 perpetrators identified (of them 11 women and 3 foreigners) (Ministry of Interior, 2021c).

cases of DV in the country, as such cannot be determined through publicly available resources.

► **District and municipal administrations.** Twenty-one of the thirty-one district and municipal administrations that responded to the request for information are not in possession of statistics on domestic and/or GBV. While most of the written replies state that they do not gather such data, some argue that no cases of GBV have been reported and/or identified on their territory. District and municipal administrations rarely refer to other institutions that may have such data or provide services for victims. A positive and encouraging exception is the Razgrad district administration (and various stakeholders from this region), which reported detailed information concerning, among others:

△ The number of DV cases (disaggregated by the victim's sex) for the last five years, number of consultations with DV perpetrators, number of registered reports for DV, etc.

△ Information about the work of all regional courts and prosecutor's offices (including, for the past five years, the number of pre-trial proceedings launched and pending, the number of closed cases (disaggregated by their outcome, etc.), the number of PDVA measures issued, and the number of Protection Orders issued per the PDVA measures, etc.)

△ Information about trainings and education initiatives to increase awareness and stimulate prevention (although again, the described initiatives target and involve children, i.e. they are not linked to IPV)

△ Information about the social services provided on the territory of the district.

△ Data from emergency medical services, including the number of hospitalized victims of violence in the past five years.

Some municipal institutions declare having strategic and policy documents that touch upon DGBV and/or collect some data marginally related to the topic. For instance, three district administrations and one Labour Office provide reports, excerpts of reports or summarized information about activities focusing on equality between men and women, which sometimes include mentions of DV. One municipality notes that its strategy for equality, inclusion, and participation of the Roma population contains measures to prevent human trafficking and sexual violence within the Roma community. While around one-third of the written replies from state, district and municipal bodies mention existing strategies, coordination mechanisms, and social services on their territories, none report the existence of a strategic or policy document specifically concentrated on IPV.

The importance of DGBV is not fully recognized. DV and IPV in particular are largely not thought of as social problems, or as an issue of public health and well-being. Abuse happening in the home remains a private matter. The link between DGBV and gender norms, which perpetuate inequalities and socio-cultural dogmas tolerating violence, remains unexplored and unseen. For uncited reasons, municipalities and district administrations do not possess and cannot acquire data related to DV within their territories. The one good example described above should be investigated further, as it could

be indicative of a good cooperation between local institutions, high trust in the district's administration or availability of experts in the field. Thus, it could potentially serve as a best practice to be scaled and transferred to the rest of the municipalities in Bulgaria.

► **Regional directorates of the Ministry of Interior (Moi).** Written replies were received from six out of 28 regional directorates that were contacted. There is a notable difference between the format and content of the communicated information across directorates in different regions. For instance, one of the letters only mentions the number of registered cases (without mentioning the sex, age, etc. of the victims) in its jurisdiction for the period 2019-mid-2021. Another written reply reports on the number of Protection Orders issued by regional courts last year, noting that 66 out of 67 orders were issued to the benefit of women. Another regional directorate reports the details of each protection measure issued on the basis of articles 15, 16 and 18 of PDVA for 2020. One of the regional directorates that responded sent comprehensive information on the policies related to prevention, protection, and support it complies with, as well as on the trainings its employees participated in. Notably, this letter describes efforts to adopt measures that resemble a victim-centred approach, aiming at helping the victim escape future violence and seek protection.

In Bulgaria, data on DV is not systematically collected and analysed. When such data are collected, the methodology behind collection differs across locations, hindering the establishment of trends and making comparisons across regions and municipalities. This also limits the possibility of mapping the intensity and frequency of the phenomenon in the country. GBV is rarely, if at all, mentioned. Gender- and victim needs' mainstreaming is also largely absent.

► **Regional and district prosecutor's offices and courts.** Statistical data were received from three district courts, one regional court, two district prosecutor's offices, and one regional prosecutor's office, alongside two structures at the national level – the National Institute of Justice (NIJ) and the National Legal Aid Bureau. The three district courts that replied to the information requests sent laconic data on their case law. For instance, one district court only included information on the number of initiated appellate cases (12 in total) for 2020, while another district court provided a more detailed snapshot of the newly initiated cases in its jurisdiction for 2015-2020 by year (in this case, there seems to be a downward trend in applications, falling from 12 in 2015 to only 4 in 2020; unfortunately, no further details on this are provided). The last district court to respond only provided data for 2017 (51 cases in the regional court, and 17 appeals in the district court) and 2018 (70 cases in the regional court, and 9 appeals in the district court), noting an increase in the applications pursuant to the provisions of the PDVA. The latter court also provided a comprehensive presentation delineating and explaining the relationship among combatting DV, countering gender-based discrimination, and empowering women. The regional court that responded forwarded an annual report on its activities, noting that in 2020, 238 applications for protection against DV were to be heard by the court, marking a slight decrease in comparison to 2019 (283 applications), and a slight rise in comparison to 2018 (226

applications). In terms of the district prosecutor's offices, one reports no current cases or criminal proceedings related to DV in its jurisdiction, while the other does not cite any statistics in its official reply. The only regional prosecutor's office that responded to the information request does not report information of relevance to the present study. On a more positive note, the NIJ provides that it currently implements a four-year project on DV and violence against women, with a focus on the prevention and combatting of violence, awareness raising and capacity-building among professionals, victim-centred approaches, institutional cooperation, and developing justice system guidelines based upon European standards in the area of DGBV. NIJ further reports that DV is part of its ordinary introductory training activities, and has been a focus of at least six different justice system practitioners' trainings in 2020 and 2021, among other similar endeavours. Finally, the National Legal Aid Bureau provides that in 2020, 101 victims of DV have received legal aid through consultations and procedural representation in court per the Legal Aid Act. The Bureau notes that it operates a telephone consultation service (+359(0)70018250), where victims can receive aid and direction, and that new pilot centres were created in three towns in Bulgaria in 2021 as part of a dedicated project. Importantly, the centres offer services tailored to vulnerable groups (e.g. the Roma) in cases of DGBV, yet data reporting on the number of consultations is cited as unavailable at the time this report was prepared.

The justice system in Bulgaria exhibits relatively low responsiveness rates, which partially precludes the formulation of any general observations on the incidence and prevalence of DV cases that become a subject of the activities of the Prosecution and/or reach both the civil and the criminal divisions of the courts. The lack of demographic disaggregation of the data provided herein further complicates the process of drawing conclusions on reporting, vulnerability, risk and so on.

► **Healthcare facilities.** Only two responses from hospitals were received out of 28 requests. One of the replies states that in 2020, 20% (104) of the forensic medicine examinations concerned cases of DGBV, but fails to mention the patients' sex. The other response provides more information based on the work of a specialized consultative service for DV victims located within the hospital. During the period of July 1, 2019-March 30, 2020, 110 persons sought assistance, 99% of whom were women. However, only a fraction of them requested psychological assistance and support. During the period of March 30, 2021-July 1, 2021, the 24/7 hotline (which replaced physical visits to the specialized consultative service due to the COVID-19 pandemic) received 198 calls, 'the majority' of which related to DV.

The fact that only two medical institutions answered the request for information is indicative of the persisting tendency of hospitals and medical centres (polyclinics) to not be actively involved in counter-DGBV efforts, especially when it comes to registering and supporting victims. Increased awareness and responsiveness from healthcare practitioners and policy-makers is necessary for more effective protection and rehabilitation of DGBV victims.

► **NGOs.** None of the contacted NGOs responded in writing to the request for data on DGBV available to them. However, it should be noted that most NGOs working on this topic directly publish regular reports, statistics, and articles on the issue. Many regularly request relevant and up-to-date data from competent institutions and publicize the gathered information through their websites, social media accounts and various media channels in Bulgaria. In June 2021, the Bulgarian Helsinki Committee published a comprehensive report identifying the gaps in the Bulgarian legislation addressing violence against women and DV. According to its authors, introducing state-of-the-art standards and complying with the recommendations of international bodies is not enough; Bulgaria's progress in countering these phenomena should be periodically evaluated by an independent institution, and the most suitable framework is the one drawn by the Istanbul Convention (Kanev and Krasteva, 2021, pp. 81-82). Additionally, among the main objectives of the Bulgarian Fund for Women is "supporting independent monitoring of government's commitments and initiatives related to gender equality in Bulgaria", as the organisation regularly launches advocacy and public awareness campaigns and publishes information about DV cases, especially those with a fatal outcome (ClubZ.bg, 2020). PULSE Foundation, "Demetra" Association and "Animus Association" Foundation operate Crisis Centres for victims of DV and try to keep track of case numbers and specificities. The latter's national hotline for victims of violence has been functioning for almost twenty-five years – information on the number of calls is frequently publicized by the organisation.

NGOs remain key actors in efforts to protect victims of DGBV, implementing prevention programmes, collecting statistics and preparing comprehensive reports on the situation in the country. Their contributions to various regional and international reporting mechanisms (including shadow reports) are essential to the formulation of clear and specific recommendations on the part of the respective bodies and organisations.

4.2 The Voices of Experts

The following section zooms in on the accounts shared by respondents during the course of ten focus groups and seventeen in-depth interviews with professionals working on cases of DGBV in ten Bulgarian towns. The sub-sections below follow the distribution of counter-DGBV measures and activities into seven main thematic areas, following the structure of the indicators in the Monitoring Methodology (*General legislative and policy measures, Prevention, Protection, Prosecution and punishment, Reparations, Coordination, monitoring and data collection and International cooperation*) and three additional thematic areas (*Factors and risks underlying DGBV, Intersectional vulnerabilities, and New types of DGBV*). The narrative analysis in each subsection is followed by a table demonstrating how the qualitative indicators proposed in the Monitoring Methodology can be of help to the analyst applying it. For the time being, the unavailability of detailed, standardised, and up-to-date information on DGBV at the national level and for each of the thematic areas makes filling out the quantitative indicators included in the Monitoring Methodology unreliable and invalid to a large extent.

Section 1: General Legislative and Policy Measures

As of October 2021, the Bulgarian legislation does not contain a definition of GBV or violence against women. However, certain international documents, such as Directive 2012/29/EU of the European Parliament and of the Council of 25 October 2012 establishing minimum standards on the rights, support and protection of victims of crime (the Victims' Directive), do provide a definition of GBV and also create legal obligations for Bulgaria. Nationally, Article 2(1) of PDVA provides a definition of DV, and in 2019, the Bulgarian CC was amended to add DV as an aggravating circumstance for several crimes, such as murder, incitement towards suicide, bodily injury, kidnapping, illegal deprivation of liberty, coercion, and threats to commit a crime against someone (PULSE Foundation, 2020, p. 5). Notably, the CC definition requires the act of violence to be "systemic" (i.e. violence that occurs three or more times) – a highly criticized aspect not present in the civil legislation. This amendment was adopted to strengthen measures countering violence against women in the aftermath of the Bulgarian Constitutional Court's decision (Bulgarian Constitutional Court, 2018) pronouncing parts of the Istanbul Convention unconstitutional. Amendments to PDVA concerning changes to procedures, deadlines, and measures envisioned in the DV legislation, (including concomitant and consequential changes to the CC, the establishment of a central register of DV cases, as well as of a national body to formulate, implement and evaluate policies and coordinate the actions of institutions involved in counteraction to DV) have been proposed (Council of Ministers, 2021a), but are yet to be discussed and adopted.

Annually, the Council of Ministers adopts a *National Programme for Prevention and Protection against Domestic Violence (NPPPDV)*, which aims to set certain basic benchmarks in the general area of DV combatting, such as building institutional mechanisms for coordination and monitoring of the activities for prevention and protection against DV, increasing public sensitivity to the problem, as well as amplifying the capacity of

professionals and institutions responsible for the implementation of prevention and protection measures.

Among the commonly identified legislative shortcomings is the lack of precise definitions of the terms 'economic violence' and 'psychological violence', as well as the failure to remove the problematic word 'systemic' from DV's definition in Art. 93(31) of the CC. The results of the fieldwork confirm that an in-depth understanding about the nature of domestic GBV and its types is still absent. During FG9⁶ discussions, traits of psychological and economic violence are mentioned, but the proper terms are never used, whilst a FG10 participant misidentifies a case of a person becoming violent because they are poor as an example of economic violence. The professional interviewed in I4 notes that psychological and emotional violence and negligence are very difficult to establish and prove; this observation is echoed in I12 with respect to GBV in general (see Section 4: Prosecution and punishment). A FG8 respondent makes the rather worrisome statement that the line between the presence and the absence of violence is very thin. The introduction of clear definitions, the reliance on solid institutional practice, and the holding of frequent trainings are needed to improve the capacity to identify violence. The fieldwork failed to identify and bring forward sufficient familiarity with the existing definition of DV or a general understanding of what GBV might entail. One FG4 participant asking for a clarification of the term systemic violence and another labelled aggression against the LGBTI+ community as discrimination rather than GBV. Elsewhere (FG5), representatives of both NGOs and local institutions criticised the notion of systemic violence and defended calls for its removal, as this requirement may lead to a failure to protect victims and even to lethal outcomes as singular acts of violence go unpunished. Still, PDVA and the inclusion of DV in the Criminal Code were described as positive developments, which encourage victims of DV to file reports and seek assistance, feeling at least marginally more protected under the Act's provisions (FG2, I13).

The fieldwork demonstrated that the precise roles of institutions at national, district, municipal levels in applying existing legislation and undertaking counter-measures remain vague. For instance, a FG8 participant was unsure which body should hold responsibility for monitoring the efficiency and effectiveness of counter-DV legislation. Opinions that some procedures are too bureaucratic, time-consuming and unclear were frequently expressed (FG3, FG6, FG10, I3) – this urges first respondents to use personal contacts and even 'exploit procedural loopholes' to do what they feel is best or appropriate, only later returning to compiling and filling out documentation. This seems to reflect a viewpoint widely-shared by respondents – the institutions are doing what they can or rather what they think falls into their mandate or competences, because often internal regulations are not particularly straightforward with respect to DGBV.

Certain hesitation is noticeable when the position and functions of district and municipal administrations, with respect to countering DV, are scrutinized. Some municipalities (FG2) seem to be more actively involved than others, as their representatives are familiar with existing mechanisms for establishing cases of abuse, and describe the relevant

⁶ Note that "FG" denotes "focus group", and "I" – "interview".

mechanisms as successful and efficient. However, elsewhere it is mentioned that a municipal programme for prevention might be very useful but is still missing (FG6, FG8), and a FG1 participant called for a bigger role of the municipality in efforts countering the studied types of violence. Our desk research demonstrated that Razgrad district was the first to establish a District Council for Prevention of Domestic violence – a body active in publishing annual reports, materials, and statistics and often indicated as a good practice and example of multi-institutional cooperation. We believe that a future in-depth study of the factors that precondition big differences between districts and municipalities will be very useful for pinpointing and exchanging good institutional practices for the purpose of eliminating the bad ones. Some aspects that deserve further exploration are: a) district/municipality size; b) staff/expert turnover in district/municipal administrations; c) presence of NGO(s) operating within the district/municipality – especially one(s) providing support and protection services to victims of violence; d) number of large-scale projects (with national and international partners) implemented in the last few years, etc. One professional (I1) made an interesting practice-based observation – in smaller municipalities, experts ‘do their job easier’ once a case of DV is established, but what is difficult is collecting information and proving that this is indeed a case of DV, as relatives and friends are very hesitant to share and help law enforcement and social workers. An FG6 participant supports the latter observation, but explains that in smaller towns and villages, the authorities may ‘put pressure’ on perpetrators, seemingly to make them abstain from future abuse.

It is imperative to firmly place the victim-centred approach at the heart of counter-violence efforts – our analysis of desk research and fieldwork has shown that much greater efforts are needed in this respect. A victim’s best interest and the empathy for their suffering should be mainstreamed through all steps of the prevention, protection, prosecution processes, and inter-institutional cooperation. Although a general understanding of the victim’s centrality is undeniably present in the respondents’ opinions, certain components and tenets of the victim-centred approach need to be reinforced – both when drafting strategic and policy documents and when applying them in practice. Sometimes, the manner in which suspected cases of DGBV are discussed cannot be described as sparing, let alone empathetic, of the victim. An FG4 participant reflected on the possibility that a man can be a good father despite being an abusive partner – a quite problematic statement, considering the negative effects abuse against their mother can have on children, such as destroying the mother/child bond or forcing the child to accept victimisation as normal (Cunningham and Baker, 2007). Several respondents (FG4, FG8) shared that they end up annoyed when responding to a DV call only to find a woman denying the occurrence of abuse, i.e. without realising that she might need encouragement and psychological support to report violence and seek help. Based on these and other insights gathered from the fieldwork, we may hypothesise that the sense of ‘time being wasted’ when responding to such a call can be linked to fear of revenge or burnout in first responders (both topics are to be discussed later on, esp. in Section 3: Provision of support and protection). Therefore, the need to place victim’s rights and needs at the centre of all measures and actions should be constantly reiterated and reaffirmed.

The lack of financial, logistical, and human resources was touched upon in all focus group discussions and interviews. The acuteness of this problem is especially obvious

when looking at the number of Crisis Centres and their capacity for accommodating victims of violence. It is paramount to increase and enrich the expertise and know-how of experts and caregivers, equipping them with an up-to-date knowledge about DGBV, as conceptualised in international and national documents.

Table 1: Key Indicators In The Area Of General Legislative And Policy Measures⁷

Key Indicator	Brief Summary of Findings
1. Normative, strategic and policy documents focusing on domestic (and gender-based) violence currently in place	Yes. There are such legal, strategic, and policy documents in place, but they must be perfected to cover more types of violence and provide better support to the victims.
2. Criminalised types of DV	Yes, DV is criminalised. GBV as such is not criminalised (see primary indicator 3).
3. Specific, comprehensive, and unambiguous definitions of DV and its types and GBV and its types	Yes, but partially. DV is defined, but more precise and comprehensive definitions are needed for some types of DV (psychological, economic). The requirement for 'systemic violence' contained in the CC definition of DV should be eliminated. A precise and comprehensive legal definition of GBV should be coined and adopted.
4. Victim- and gender-centeredness of the documents	Yes, but partially. Strategic and policy documents should be perfected to better reflect the components of the victim-centred approach. Frontline workers should be trained to understand the importance of the victim-centred approach and how to ensure it is being followed when they perform their duties.
5. Periodic evaluation of normative, strategic and policy documents	Not fully established from the fieldwork. A new NPPPDV is adopted by the Council of Ministers each year. It is not completely clear to what extent the contents of the new programme are based on an evaluation and a review of the previous one. The annual programme is not accompanied by a publicly available annual report. However, before the adoption of the new programme, Mol invites relevant institutions and organisations to report on their NPPPDV-related activities for the previous year and propose activities to be included in the new one.
1. Sufficiency of available resources (human and financial)	No.

⁷ In all indicator tables, the primary and secondary indicators are colour coded, where the secondary indicators appear in grey in the latter parts of the table.

Section 2: Prevention

'Prevention' has acquired the status of a buzzword when deliberating on and implementing counter-DV and counter-GBV measures. However, the overall perception of the substance behind the word appears to be vague when discussing and monitoring activities, initiatives, and acts related to prevention. To a large extent, this argument is supported by the fieldwork findings, thus allowing for the formulation of precise recommendations for future actions. Prevention – the ultimate goal of efforts to increase public awareness about DV and to advance and expand the qualifications and skills of specialists implementing counter-DV measures – is a central component of the 2021 NPPPDV (Council of Ministers, 2021b). The projected result from the implementation of all recommended measures is the ability to recognise DV as a phenomenon and instil public intolerance towards all of its manifestations.

During the fieldwork, it was established that trainings related to prevention have been carried out to include social workers, law enforcement officials, and magistrates, though the exact number of trainings and trained persons was not collected for all towns and institutions. However, the feedback received about past trainings was ambivalent. Court and prosecutor's office representatives in FG8 shared that more trainings and campaigns related to prevention are necessary, as the ones they had attended so far had not been sufficient. A FG1 participant stated that their colleagues definitely need more know-how with respect to prevention, whilst some interviewees described trainings for frontline practitioners as inadequate (I15) or limited in scope and duration as they are often project-based (I16). The opinion that trainings should range from covering very broad and general topics to concentrating on very particular cases was voiced (I17). The overall impression from focus group discussions and interviews is that trainings and qualification courses focusing on prevention should be more focused on the specific needs of individuals or groups that are taking the training / course in question.

Many respondents (I4, I5, I6, I14, FG2, FG6, FG9 and FG10) agreed that more prevention initiatives and activities are necessary, and some specified that this is especially true when raising public awareness in schools or addressing vulnerable groups such as Roma women. During one of the discussions (FG10), a respondent made the important point that campaigns in schools should focus not only on eliminating aggression and school bullying, but should also recognise DV and make individuals aware of ways to seek assistance. It was reiterated (FG2) that the role of teachers is key – they should be taught how to identify alarming signs and know which institution to turn to if they suspect their students are experiencing or witnessing abuse at home. This seems essential, as several participants (FG2 and FG9) shared that a hotline for reporting violence in Bulgarian schools has failed to fulfil its purpose, as students often 'abuse' it by making prank calls – whilst the exact reason for this remains unclear, it could be hypothesised that students are still not aware of the seriousness of acts of violence.

A FG3 participant described anti-violence trainings in schools as not entirely successful, hinting that one of the reasons is the parents' unwillingness to support such trainings. Another participant in the same group called for more prevention-focused trainings at the local level so that capacity and expertise is built outside the country's capital as well.

Importantly, institutions' representatives in FG4 and FG8 pointed out that programmes for prevention of DV should be adopted on the municipal level too, and the responsibility for the implementation of such trainings should not fall disproportionately on the NGO sector. The need for more vigorous involvement of the municipality in prevention efforts through the implementation of a local programme for prevention was also pointed out in interview 14. FG4 participants described talks on privacy and dignity organised in kindergartens and schools as valuable, but noted that it is first responders that need more trainings so they are able to recognise violence when they see it or it is reported to them. This falls in line with the observation (FG9) that when it comes to prevention and protection, social workers seem to be disproportionately burdened. Instead, workload, tasks, and responsibilities should be distributed evenly between them and other specialists – especially police and particularly when the perpetrators are very violent and medical and social workers fear for their safety.

Both the desk research and the fieldwork lead to the conclusion that the ability to recognise DGBV is central for the success of efforts to prevent and report it. However, it is not only specialists and witnesses that must foster this capacity. It is essential that victims and perpetrators are conscious of the fact that what they experience or cause actually constitutes an act of violence. This could be achieved through awareness-raising campaigns targeting perpetrators, and individual work with both perpetrators and victims. Such campaigns should be designed with the need to eliminate toxic masculinity and the normalisation of abuse, whilst individual work might have to involve efforts to battle substance and alcohol abuse. "Work with Perpetrators" programmes should always involve a prevention-centred component, as this may reduce the possibility of reoffending (I1). The demand for such (well-planned and carefully carried out) initiatives is noteworthy and will be discussed in detail in the section on punishment and prosecution.

Remarkably missing from prevention-related conversations was any reference to the application of risk assessment tools as key features of successful prevention strategies. Good examples of such tools coming from other countries are ample. For instance, the *Spousal Assault Risk Assessment Guide* (SARA) "can help determine the degree to which an individual poses a DV threat to his/her partner, children, another family member, or another person involved" (Kropp, Hart, Webster and Eaves, 1999). Three considerations could lead to perfected risk assessment tools: (i) risk assessment is a strategy to prevent violence; (ii) victims' assessment of their own risk could not only provide more information about a case, but increase a tool's accuracy; and (iii) reframing risk assessment tools to take into account psychological violence and coercive and controlling behaviours (Mann and Tosun, 2020, p. 18). It is encouraging that some interventions emphasise the increased vulnerability of individuals belonging to specific groups – for instance, Roma (FG3, FG6), victims of human trafficking (FG5), and children whose parents live and work abroad (FG9). However, precise instruments aimed at measuring the risk that exists for them are largely missing. Therefore, it is important to recognise that without adequate and robust instruments and practices linked to risk assessment, any approach to preventive trainings and activities will remain piecemeal.

Moving forward, a FG2 participant recommended that prevention and protection-related trainings should be organised for social assistants/caregivers of elderly people. The

non-compulsory character of such sessions was described as a flaw, but it was pointed out that they did take place at the insistence of the municipality, which was praised as a good practice. The topic is important for two reasons. Again, this underscores the centrality of municipalities when it comes to establishing the extent to which DGBV is present on their territory. Secondly, this observation brings into the open a type of violence seemingly even more obscure than IPV – namely, violence against elderly patients in institutions or elderly relatives taken care of at home. We return to this topic in the sub-chapter on intersectional vulnerabilities.

During FG3, the role of media was briefly mentioned. In general, the absence of any references to the (need for greater) involvement of media and the private sector is problematic, not least because their assistance should be scouted for and, in fact, valued. The help of media – and local media in particular – can be highly valuable when it comes to promoting awareness-raising campaigns or guiding victims to protection services. The private sector could assist efforts to encourage reporting of abuse or recognise violence through various corporate social responsibility trainings or in-house prevention trainings. The absence of media and private sector representatives from focus group discussions can be seen as a shortcoming, which has to be corrected during future monitoring cycles.

Professionals must enrich and expand their skills, knowledge, and expertise in the field of prevention. The foundations for this have been laid, as the majority of respondents have been taking part in trainings of different formats, contents, and duration. Evidently, activities adapted to the needs of the given institution, unit, professional, etc. and referring to actual practical cases and examples of good practices from abroad are strongly preferred and can be seen as a crucial upgrade. An intriguing suggestion came during I6; the respondent suggesting that minimum standards for prevention should be explicitly outlined in relevant legislation. The introduction of such standards can be a good next step forward, as this can facilitate monitoring and evaluation efforts.

Again, a victim-centred approach should be actively pursued and clearly communicated to the first responders with respect to all preventive measures – trainings, social and media campaigns, hotlines, components of school curricula, and social services. The mere mention of prevention should not and cannot be seen as a panacea to the individual and social ills caused by DGBV. The local context, the distinct features of the social environment and the foci of the public debate cannot be ignored when devising and implementing prevention strategies.

Table 2: Key Indicators In The Area Of Prevention

Key Indicator	Brief Summary of Findings
1. Specific mention of prevention and preventive measures by key normative, policy and strategic documents currently in force	Yes. Prevention has been a key component of the annual NPPPDV. Prevention is frequently, if not always, mentioned in key legislative, policy and strategic documents, including PDVA.
2. Contents and characteristics of the prevention-related measures	Not fully established from the fieldwork or the desk research. Some details have been provided but further information is needed on the number and profile of participants and covered topics. It is important to ask participants for feedback on how they evaluate the training and what topics or activities were missing that would have been valuable. This is especially valid for trainings and events carried out locally.
3. Effectiveness of prevention-related measures in terms of creating awareness and understanding of DGBV	Not fully established from the fieldwork or the desk research. Some details have been provided but further information is needed, especially data acquired through direct work with victims and perpetrators.
1. Format and frequency of trainings, education sessions and capacity-building discussed in the Primary indicators section	Not established from the fieldwork or the desk research. Some details have been provided, but further information is needed on the number and frequency of the trainings. This is especially valid for trainings and events carried out locally.

Section 3: Provision of Support and Protection

In the most straightforward manner, protection measures are delineated in Art. 5 of PDVA. The provisions include inter alia, ordering the perpetrator to refrain from further violence (i.e. a measure against re-victimisation, Art. 5(1)(1)), removing the perpetrator from the place of cohabitation (Art. 5(1)(2)), prohibiting the perpetrator from approaching the victim, the latter's home, workplace and places of social contact and leisure (Art. 5(1)(3)), locating any common children with the victim (Art. 5(1)(4)), and referring the victim to rehabilitation programmes (Art. 5(1)(6)). Art. 6 of the same Act describes relevant conditions to the measures for protection (and prevention), such as the responsible institutions, the devising of policies and strategies, the budget allocation, and so on. PDVA notably contains provisions on the issuing of a Protection Order, and an Immediate Protection Order, pursuant to a court application on part of the victim (or an admissible representative). The 2021 NPPPDV lists five action points related to this thematic area (points 25-29): the maintenance of the national hotline for DV victims, and the 24/7 national specialized hotline for DV cases; the supplying of social services for children and adults in Crisis Centres, Centres for social rehabilitation and integration, and Centres for community support; the development of a framework for specialized and integrated services for protection, rehabilitation and reintegration of children, victims of violence, and for supporting their parents; and the supply of NGO services for victims of DV. An Act of further importance is the 2020 Social Services Act, which includes provisions related to the referring of victims to specialized services, the provision of such services by the Social Support Directorate, and the latter's capacities to represent children in preliminary PDVA procedures.

Provision of protection and support was an area that respondents in the fieldwork activities readily recognised and offered insights and opinions on. Most respondents chose to address the issue of victim services, instead of commenting on matters such as access to justice, ex officio prosecution, the impact of court proceedings on victims (i.e. victim sensitivity of the civil and criminal proceedings), and the availability of legal aid. It is possible that this is due to the types of respondents represented.⁸ Hence, these latter questions remained largely unanswered in both the focus groups and the interviews. Nonetheless, participants brought attention to the unavailability and/or insufficiency of the existing services for victims, noting that Crisis Centres are seen as an established good practice, yet their capacity is far too limited to cater to the needs of victims effectively (FG1, FG2, FG3, FG6, FG8, FG10, I1, I2, I5, I7, I8, I13, I15, I16, I17). Financial constraints, limited resources, and the unavailability of systemic methodological assistance (FG5, FG8, I2, I5, I7, I17), alongside limited training and capacity-building for Crisis Centre workers (FG8, I17) are recognised as among the key factors for the overall inefficiency and inadequacy of the protection and rehabilitation services for victims. Relatedly, such deficiencies may

⁸ Objectively, more social workers and NGO representatives, as well as other first-line respondents, were represented during the focus groups and interviews in comparison to professionals in the justice sphere, who could have been better equipped to critically assess these legal aspects.

lead to a lack of longer-term services for victims (FG3, I13)⁹, as well as exacerbate the insufficiency of available Crisis Centre spaces, especially in periods when heightened levels of DV are observed (such as the autumn-winter season, according to respondents) (FG3, FG7, FG8). Importantly, problematic areas in the overall protection and support area were amplified by the absence of round the clock services for victims, difficulties getting in touch with relevant institutions and service providers during weekends, and lack of clarity about what services are available and can be accessed in a certain town at a certain time (FG1, FG5, FG8, I3, I6, I16). Stemming from the latter, respondents felt unsure how to react and who to contact when faced with a case of DV and a victim in need of protection, sometimes voicing scepticism or reluctance to seek the assistance of both government structures (FG1, FG4, FG6, I3, I6, I15), and non-governmental organisations (NGO) (FG8, I3, I15, I17). Some were also uncertain about the procedures for booking an individual into a Crisis Centre (FG6) and/or immediate emergency accommodation in such crisis facilities, while the general problem of the undue administrative burden on victims wanting to be accommodated in a Crisis Centre was not discussed by any of the respondents. No mention was made of the inadequacies and challenges related to the documentation needed to access crisis services. A significant conclusion, hence, is that there is a clear link between the availability and quality of victim services (especially consultative and residential-type Crisis Centres, as well as victim hotlines and chatbots, mobile services for victims, and operational methodological tools for law enforcement on the local level), and the better protection of victims, including the willingness of victims to come forward and seek help (I4, I5, I6, I7). In fact, only one respondent in the fieldwork activities assessed the protection services in their municipality as well-developed (I14). A solution proposed in relation to this was increasing state ownership and responsibility for crisis services (I15).

Immediately related to this is the common observation that many victims are either unaware that they can / choose not to contact the relevant institutions and NGOs in cases of DV, opting to remain with the perpetrator or seek support from relatives and friends (FG3, FG4, FG8, I2). Reasons for this relate to challenges in the realm of prevention (victims simply do not know who to turn to), as well as being dependent (financially or otherwise) on the perpetrator, feelings of shame and embarrassment (I14) (especially in smaller towns and closer-knit communities (I11)), fear of retribution, incapability to afford the expenses related to reporting a case of DV (e.g. a forensic medical report) (FG4), as well as fear of having one's children taken away by the Child Protection Agency (I8). Similar justifications apply in cases in which relatives and neighbours know of the violence, but fail to report it (FG6, I1). These interjections by different respondents delineate a self-reinforcing negative dynamic that starts with difficulties in the area of prevention, thus impacting victims' access to protection, and ends with challenges in the field of prosecution and punishment, as well as compensation and rehabilitation, where the risk of re-victimisation and re-traumatisation are not comprehensively counteracted. Some specific examples of this are intra-marital violence (FG5), as marital rape is decriminalized in Bulgaria. Another problematic aspect is the flaw in Art. 5 PDVA, whereby the police are

⁹ Such long-term services include crisis accommodation for long periods of time (e.g. 6 months), longer-term counselling and psychological work, and extended legal aid in protracted court proceedings, financial assistance for livelihood expenses (I13)

said to believe that with the expiration of the Protection Order, the requirement that the perpetrator abstain from further violence also expires (FG4) – an interpretation that the legislation allows. Additionally, currently victim services and rehabilitation programmes for perpetrators may be offered by the same organisation in the same place (FG10) – a risk of secondary victimisation unaddressed by the very mechanism for offering protection and victim services, as prescribed by the PDVA (see Section 4: Prosecution and punishment and Section 5: Reparations). In this respect, as one respondent states, the weaknesses in the law and in the reactions of the relevant institutions may lead to life-threatening and even fatal outcomes (FG5).

The fieldwork activities also shed light on the persistence of victim-blaming attitudes that may preclude the expansion, improvement and reach of the protection and support services for DV survivors. Apart from difficulties in cooperation among the relevant institutions and the NGO sector that offer and carry out victim services, narratives that see the victim as responsible for “choosing” an abuser for a partner, “choosing” not to report or file a court application, “choosing” to continue living with the abuser and not “helping herself” were also present. Different respondents spoke about this both critically (acknowledging that this is a problematic victim-blaming attitude), but also uncritically (i.e. recognising that victims play a role in their own victimisation) (I3 and FG4, respectively). This ambivalence implies that victim-sensitive training of professionals is highly necessary.

Furthermore, institutions in the justice system were said to be unwilling to work for applicants for “25 BGN”, DV cases were described as a “circus”, and professionals “cannot be bothered” to work on such cases or exhibit negligence in addressing these situations (FG4, I3, I6). Some respondents also share the opinion that they are not under an obligation to act extra vires (i.e. beyond what their specific lawful obligations are) even in highly morally questionable cases (FG6). Respondents also noted that “less severe” instances such as stalking were treated much less seriously by the police, prosecution and courts (FG4), while DV generally meets a passive response (I16). Implicit normalisation, even trivialisation, of DV is also observable, especially where the act of violence is perpetrated upon an adult (FG8). Victim-blaming, together with violence normalisation, are further reinforced by reference to culture and tradition, including those of ethnic minorities (FG6, I11, I13, I14, I16) (see Section 8: Discrimination).

A highly specific leitmotif among a number of focus groups and interviews was the repeated reference to the so-termed “false reports” of DV (FG4, FG5, FG7, FG8, FG9, I15). Such are said to be used by “bogus victims” in divorce and custody cases in which one parent aims to malign the other and sway the court by filing a DV application (see Section 4: Prosecution and punishment). While none of the respondents presented any statistical and/or factual data to argument their observation on the issue of false reporting, the over-emphasis on such misuses of the law may result in the building of institutional resistance to effectively protect victims, especially such from stereotyped and stigmatized social groups (e.g. the Roma), as well as discourage genuine victims from reporting and seeking protection for fear of not being believed and trusted. Unfortunately, participants in the fieldwork activities did not address the impact of this false reports narrative beyond viewing it as a burden on the already strained justice system.

Several less extensively discussed topics must also be mentioned. The first aspect is the effect of COVID-19, as respondents share that not only have DV cases increased, but they have also grown more severe (FG2, FG4). At the same time, it is observed by participants that PDVA court cases have decreased – a development that may be explained by reference to the fact that during the 2020 lockdown courts did not accept applications in person, but solely via post or electronically (FG2). Furthermore, it must be noted that the challenges of inter-institutional and NGO cooperation are significantly less pronounced in cases that pertain to children (as victims), potentially due to the existence and operability of the National coordination mechanism for cooperation in cases of children, victims or at risk of violence (FG10, I11). Violence against children emerged as a “safe topic” that fostered deeper and more open discussion among respondents, who seemed to gravitate towards this topic (FG1, FG2, FG3, FG6, FG9, I13), unlike violence against women, as a form of GBV (where the latter term remains largely unknown and unusable in the Bulgarian setting). Moreover, some respondents briefly emphasized that certain practitioners that work directly with victims of DV are themselves fearful of retribution should they report cases of such violence to the authorities (FG9) or are personally victimised by beneficiaries of their services (victims and/or perpetrators) or perpetrators, whose victims benefit from social services (FG6). Finally, it was noted that first-responders felt over-monitored by the higher tiers of their home institutions/organisations, and that an increased emphasis on the repercussions of making a mistake could potentially serve as a preclusive factor to acting more decisively to protect the victim in cases of DV (FG7). This is implicit in the manner of responding to questions in both the focus groups and the interviews (e.g. in I2, I4, I6).

Table 3: Key Indicators In The Area Of Support And Protection

Key Indicator	Brief Summary of Findings
1. Specific mention of protection measures in the normative, policy and strategic documents	Yes. Addressed in Art. 5 of PDVA. The same Act includes provisions on the Protection Order and the Immediate Protection Order. Further measures can be found in the current NPPPDV.
2. Effective enforcement of the measures identified in point 1	No. According to the qualitative data collected during the fieldwork activities, the PDVA measures are not always effectively enforced. Factors such as financial and resource constraints, lack of practitioner training, poor cooperation, and unavailability of local services preclude effective enforcement.
3. Mandatory, recurrent and effective capacity-building, education and training	No. According to respondents, such recurrent and effective training does not currently exist. Acute need for more capacity-building action at all levels is expressed.
4. Monitoring tools and risk assessment mechanisms available to first responders	Not established from the fieldwork or the desk research.

Key Indicator	Brief Summary of Findings
5. Accessibility and sensitivity to the victim's needs of the protection measures	No. Victim sensitivity as an approach was not explicitly recognised by respondents, although a limited number of them seemed to identify a need to counter victim-blaming attitudes, and to offer free legal aid for victims. Apart from this, there is evidence from the data collected that victims and perpetrators receive rehabilitation services at the same locations, and that the PDVA allows for the guarantee for non-repetition of violence to be only of a temporary character. Accessibility is relatively good, since hotlines operate on the national level, and the police and courts are under obligation to immediately react to applications and reports of DV. In smaller towns, access to protection services is more difficult.
6. Effective multisector referral mechanism	No. Such a mechanism exists for victims of trafficking, and a coordination mechanism exists for children, victims of violence. No such mechanism at the national level exists currently for DGBV victims. There is evidence from the data collected that municipal-level coordination guides exist in some of the focus group towns.
7. Multiplicity of actors engaged in protection measures and services	Yes. The engagement of a diverse set of actors is established in the PDVA itself, pertaining to the justice system, law enforcement, social services, NGOs, etc. Cooperation, however, remains challenging.
8. Adequacy of emergency protection measures and services	No. Crisis Centres remain few and unequally dispersed throughout the territory of the country, only capable of accommodating a low number of beneficiaries. Two DV hotlines operate nationally, managed and maintained by NGOs (one with state funding). Information on those hotlines is not advertised publicly, and is generally difficult to find. The phone numbers for the hotlines are also difficult to remember.
9. Availability of comprehensive and clear information regarding protection	No. There are some limited and not well-known state-maintained designated and DV specific repositories of knowledge both online and offline. ¹ Victims are usually guided to such services by practitioner NGOs.

*1 Some online resources include information on the Office of the Prosecutor General's website (Office of the Prosecutor General of the Republic of Bulgaria, 2020), and the website of the Ministry of Interior (Mol, 2021b).

Key Indicator	Brief Summary of Findings
1. Unenforced measures for the protection of DGBV victims	Evidence that Protection Orders are breached (i.e. not enforced effectively enough) can be found in the statistical information per Art. 296 of the CC.
2. Currently missing measures	Protection of privacy and safety, effective re-victimisation and re-traumatisation measures, comprehensive and holistic recovery services for all victims, low-cost or free legal and medical services for all victims, services targeting victims of GBV, adequate, accessible and sufficient Crisis Centres and consultation services, operational multi-sectoral referral and cooperation mechanisms, victim-sensitive prosecution processes, accessibility of protection information and legal guides, addressing known risk factors for DGBV, etc.
3. Measures protecting privacy and safety	Not established from the fieldwork or the desk research.

Section 4: Prosecution and Punishment

The extensive definitions of DGBV provided for at the international level lead to the need to examine a plethora of domestic legal instruments, as to establish what channels of prosecution and punishment are available in Bulgaria. Similar to the measures of prevention and protection, those for prosecution and punishment are dispersed throughout different pieces of legislation, and cover only some of the spectrum of aspects of DGBV. Punishment measures can be located in both criminal and civil legislation, ranging from prohibitive action to financial forms of punishment, and measures that entail deprivation of liberty and other non-financial types of punishment. Regulations regarding the process of investigation and prosecution of perpetrators are available in the Criminal Procedural Code.

First and foremost, Bulgaria's only domestic violence act (PDVA), part of the civil legislation, provides for a limited number of punishment measures, part of which overlap with the measures of protection. Those that do not overlap with the protection measures, listed in the previous section of this report, include obliging the perpetrator to attend specialised programmes (Art. 5(1)(5)), and the imposition of a mandatory fine (200-1000 BGN) upon the perpetrator in any case when a Protection Order is issued by the court. In the event that the act of DV can be subsumed under a provision of the Bulgarian CC (within the meaning of the definition of a crime committed "in the conditions of domestic violence" provided in Art. 93(31)), the severity of the punitive measures may involve deprivation of liberty or probation, depending on the gravity of the crime perpetrated. While the legislation itself does not necessarily delineate a process of cooperation and coordination among the relevant institutions and NGOs, the process of investigation, prosecution and punishment implies the necessity for such interaction.

In all ten focus groups, participants found it difficult to comprehensively discuss the topic of prosecution and punishment. Interventions were rather scarce on questions such as working with perpetrators and the combatting of reoffending by domestic abusers. While the partial criminalisation of DV in the CC was seen as a positive development (I7, I8), during a number of the discussions, the representatives of different public bodies were not completely certain what their institutions or departments should undertake, or how they can cooperate with others, and exhibited discontent with the Art. 93(31) "systemic violence" requirement (I7). One interviewee even goes as far as terming prosecution and punishment as a field that remains completely non-operational (FG8). There was substantial confusion about any measures of punishment and restriction that go beyond financial fines or deprivation of liberty (such as rehabilitation programmes, etc.). One interviewee remarked that punishment measures are less of a priority in comparison to prevention and protection (I1), while another questioned why the measures for protection required the victim, and not the perpetrator, to be relocated from the common dwelling (I11). Some participants opined that it was "useless" to work with perpetrators (FG8), while others showed awareness that such measures are necessary and could be effective, albeit difficult to implement due to absent coordination mechanisms, infrastructure, and available local services (FG3, FG9, FG2, FG4, I3, I11). Conversely, a key challenge is the claiming of ownership of and responsibility for certain restrictive measures, such as perpetrator rehabilitation programmes. One interviewee suggests that perpetrator

services could be hosted by the regional courts in cooperation with local NGOs (I3), while other participants place the onus on NGOs to implement these measures (I6). One interviewee specifically emphasised the need for trainings in the sphere of prosecution and punishment (I15). Discussants also shared that working with perpetrators with addictions (alcohol, substance abuse, gambling) is extremely difficult, and additional resources are needed to target such high-risk sub-groups (FG4, and FG2, I8). Some disagreement on the role of alcohol and substances in the perpetration of DV is present - for instance, one interviewee notes that those may provoke violence, but are rarely the root causes of domestic abuse (I3).

Another key problematic raised throughout the ten focus groups has to do with the deficiencies in the mechanisms that ensure that the perpetrator actually abides by the court-ordered punishments and restrictions. While some participants opined that the law-sanctioned punishments are too lenient and are not commensurate with the gravity of the violation committed (FG10 and FG5, I8), others placed the accent upon the lack of sanctions for breaches of court orders (FG1, FG2, FG5 and FG6, I7, I11), and the inability of the National Revenue Agency to collect the fines imposed upon the violators (FG5). Where the perpetrator has been referred to rehabilitation services, respondents note the lack of oversight and monitoring of whether he/she attends those programmes (FG7, FG5, and FG4). An observation worth noting from FG4 is that the police are said to believe that with the expiration of a given Protection Order, the measure obliging the perpetrator to refrain from further violence also expires - a significant weakness of the *lex lata* (see Section 3: Provision of support and protection and Section 5: Reparations).

In a similar manner to other topics discussed, the matter of prosecution and punishment is also addressed by some respondents within the context of the so-termed “false” DV reports, implying that parents utilise this for the sole purposes of securing custody rights in divorce cases (FG9). On the other side of the coin, it was noted that certain lawyers “defend the interests of fathers that are in trouble with the law” (FG2). None of the focus groups provide a comprehensive solution to the inherent conflict between protecting victims, identifying false reports, and addressing the rights of fathers.

In terms of the prosecution process, respondents in different focus groups painted a partial picture of the most common challenges: difficulties in terms of evidence gathering due to the absence of witnesses, the formality of the process of bringing evidence to court (especially in terms of electronic recordings and video clips) (FG5 and FG4), slow progression of the proceedings from law enforcement to the justice system, the absence of ex officio prosecution, whereby prosecution and punishment measures cannot be implemented should the victim refuse to cooperate, including providing statements, or withdraws his/her application (FG4), as well as the challenges in collecting evidence in cases of psychological violence (I4), and difficulties faced by law enforcement officials when faced with a DV perpetrator (limited discretionary powers) (I7).

Sporadic discussion of other relevant sub-topics included the lack of awareness on

the part of victims or at-risk groups that they can receive free legal aid.¹⁰ Another matter that was touched upon was reoffending by individuals on probation (FG2 and FG9), which further underscores the need for long-term and comprehensive perpetrator rehabilitation programmes. Furthermore, one interviewee sheds light on the matter of professional bias, noting that some practitioners and responders do not necessarily wish to work on DV cases (I3). Some brief remarks are also made in relation to the issue of provocation (the “crazy woman” trope) posing as a legitimate defence in cases of DV (I5), and about both victims and perpetrators “lying” about their actual relations and the factual occurrence of violence (FG6). In the same vein, one interview participant states that it is extremely difficult to establish “the truth” in cases of DGBV (I12). Finally, another interviewee brought attention to the need to combat cases of negligence from law enforcement, especially in smaller towns where policemen and the perpetrator may know each-other (I6). In contrast to this opinion, a different respondent shares that in smaller towns, cooperation and reaction in cases of DV, as well as the ability to effectively influence the perpetrators, are much more successful because “everyone knows one-another” (FG6).

In sum, the information gathered through interviews and focus groups for this topic can be characterised as rather laconic and disorganised. Participants are able to identify some key challenges, yet fail to provide in-depth analysis or engage in finding adequate solutions. It is particularly problematic that victim sensitivity in the investigation, prosecution and punishment process is not raised at all, while “false” DV reports are reiterated throughout the focus groups, and several interviews. Coordination and cooperation arguably remain the most pressing issues, coupled with the absence of financially stable and scalable perpetrator services across the board. Over-reliance on NGOs as service providers for perpetrators-while NGOs themselves report struggling to meet their commitments and provide high-quality services-and evidence of professional bias, negligence, and slow administrative procedures in some public bodies speak of a disharmony among the expectations of different classes of professionals and practitioners working or having contact with DV perpetrators. Finally, urgently important is the fact that no discussion is afforded to GBV, contributing to the overall legislative climate in Bulgaria, which does not problematise this type of violence to the extent and gravity professed in key binding international instruments such as the Convention on the elimination of all forms of discrimination against women (CEDAW) and the Istanbul Convention.

¹⁰ This is adjacent to the question of victim sensitivity of the prosecution process - an aspect not explicitly brought up in any of the ten focus groups, although in principle, a limited number of respondents recognised the need to avoid victim-blaming.

Table 4: Key Indicators In The Area Of Prosecution And Punishment

Key Indicator	Brief Summary of Findings
1. Prosecution and punishment of DGBV perpetrators addressed in normative, policy and strategic documents in force	Yes, but partially. The PDVA (civil legislation) provides for fines and certain restrictive measures upon perpetrators. The CC provides for punishments in the form of liberty deprivation or probation for crimes committed in the circumstances of DV when such violence is systemic (three or more acts). Domestic violence itself remains decriminalized as a single act. Prosecution processes are governed by the provisions of the CPC.
2. Victim-sensitive approach of the prosecution and punishment processes	Not established from the fieldwork or the desk research. A limited number of respondents do recognise the significance of free legal aid and the need to counter victim-blaming attitudes, but victim sensitivity is not recognised as such.
1. Availability of mechanisms on the prevention of reoffending	Yes, but limited. PDVA Art. 5 provides that the perpetrator refrains from further violence, and attend rehabilitation programmes, whereas according to CC Art. 296 the breaching of a Protection Order (PDVA Art. 5 measures ordered by a competent court) is a criminal offence. No discussion of CC Art. 296 took place in the fieldwork activities, thus the quality of these mechanisms cannot be established. Reoffending statistics on DV can be accessed on an annual basis by reference to CC Art. 296 with the caveat that such statistics may also include cases where actual violence has not occurred. A significant hindrance to the effective prevention of reoffending is the requirement of systemic violence in CC Art. 93(31).
2. Commensurability of legal sanctions	Some evidence. According to the Bulgarian CC, crimes committed in the circumstances of DV, are penalised more severely than the general case. Nonetheless, some respondents in the present study shared that the sanctions enshrined in the relevant legislation (including the PDVA fines) are not commensurate with the gravity of the violent act perpetrated.

Key Indicator	Brief Summary of Findings
3. Availability of ex officio prosecution for at least the most serious types of DGBV	Yes. Crimes of general character such as murder, rape and bodily harm are prosecuted ex officio, with the effect that crimes in the conditions of domestic violence per CC Art. 93(31) are prosecuted regardless of individual applications. Nonetheless, many types of DGBV remain devoid of access to ex officio prosecution and are wholly reliant on the individual's court application and cooperation during the investigation and prosecution process (e.g. types of DGBV that are currently considered insult or slander). Other categories of DGBV are devoid of access to prosecution altogether, as they are not included in the CC (gender-based psychological violence, harassment, economic violence, some types of sexual violence, online violence, etc.). Notably, DV, once again, is decriminalised, so individual acts of DV cannot be prosecuted ex officio or otherwise as such, while GBV is not recognised in the national legislation.
4. Equitable criminalisation of all types of DGBV, and sanctioning of any additional types or sub-categories	No. See secondary indicator 3.
5. Timeliness and adequacy of the prosecution and punishment measures	Not established from the fieldwork or the desk research.

Section 5: Reparations

Reparations represent an area that remains largely unfamiliar to both victims of DV and professionals working with them. As far as the international legislation is concerned, reparations could broadly be viewed in two categories: financial (compensation), and non-financial (restitution, rehabilitation, satisfaction, guarantees of non-repetition, services for recovery, etc.), where not all types outlined here are present and/or operational at the national level. Firstly, the PDVA has no provisions that address victim compensation, as compensation is not among the key areas of DV prevention and combatting addressed by the Act. The Criminal Procedure Code (CPC), in turn, defines “victim of crime” by reference to the damages suffered in direct result of a crime (Art. 74),¹¹ and allows the bringing in of civil action to gain compensation for the damages suffered by the victim (Art. 73). It must be noted that in the criminal proceedings, the damages suffered are also a subject of evidencing (Art. 102(2)). Alternatively, compensation can be sought by bringing in a civil action before a civil court following the general process for claims, as delineated in the Civil Procedure Code (CivPC), Part II. Notably, the Support and Financial Compensation for Victims of Crime Act (2007) allows the victims of certain crimes¹² to receive compensation (Art. 3) from the state. Further provisions on financial compensation are delineated in Arts. 12-15 of the Act.

In terms of non-financial means of reparation, the PDVA, in its provisions on protection, provides for the obliging of the perpetrator to refrain from further violence (Art. 5(1) (1)) – a guarantee of non-repetition (for the duration of the Protection Order), and the referral of victims to rehabilitation programmes (Art. 5(1)(6)) – rehabilitation and services for recovery. The Support and Financial Compensation for Victims of Crime Act (SFCVCA) also provides for certain not strictly financial forms of reparation: emergency medical assistance, psychological help and counselling, free legal aid¹³, and practical assistance¹⁴ (Art. 8). Unfortunately, other types of reparations are not explicitly addressed in the legislation, and what does exist offers a severely limited coverage for victims of DV.

The fieldwork activities yielded insignificant data in the general area of financial reparations. In seven of ten focus groups, there was absolutely no mention of financial reparation for DV victims, despite the discussion prompts. In FG8 it was correctly observed that no compensations are included in the PDVA, and that in criminal cases, such financial retribution must be sought under the provisions of the CivPC, yet the participants did not exhibit dissatisfaction with this absence in the targeted legislation. Only two respondents overall acknowledged the need for financial assistance in the form of a “basic financial

11 Where DV itself is not considered a crime, but an aggravating circumstance in some major categories of crimes, when and only if there is evidence of systemic violence per Art. 93(31) of the Criminal Code, understood as three or more proven acts of violence upon the same victim by the same perpetrator.

12 Such are murder, attempted murder, intentional grievous bodily harm, rape, trafficking and other severe crimes the result of which has been either death or grievous bodily harm.

13 See, the Legal Aid Act (2006).

14 Also see Art. 11(2) for a definition of “practical assistance”.

package” for victims “to start a new life” (FG7, I17). One interviewee briefly remarked that reparations remain an area characterized by lack of progressive development (I5), while another outright stated that they “ha[d] never heard of a victim that had received compensation” (I15).

When it comes to non-financial means of reparation for victims of DV, participants in the focus groups and interviews commonly spoke about rehabilitation and other post-violence services together with protection measures, reflecting the ordinary conflation of the two areas in the DV legislation (the PDVA) and the policy documents (the NPPPDVs) (see Section 3: Provision of support and protection). Rehabilitation services were seen as suffering from the same ailments as protection services – financial constraints as a primary challenge (I2, I5, I6, I7), insufficient residential/consultation spaces (FG1, FG2, FG3, FG8, FG10, I1, I2, I5, I7, I8, I13, I16, I17), lack of trained human resources (FG1, FG8, I2, I5, I6, I8, I17), absence of methodological assistance (FG5, FG8), provision of victim and perpetrator services on the same premises (FG10), lack of victim services in smaller municipalities and/or geographically inadequate location of available services (FG1, FG2, FG3, I2, I5, I16), etc.. Apart from rehabilitation services, one respondent problematized the current PDVA provision on guarantees for non-repetition in Art. 5(1)(1), as described in Section 3: Provision of support and protection and Section 4: Prosecution and Punishment. No substantive remarks were made on the matters of access to legal aid, restitution, satisfaction, etc., as well as on the issue of the provision of evidence in reparations claims for different types of violence (e.g. psychological violence).

Table 5: Key Indicators In The Area Of Reparations

Key Indicator	Brief Summary of Findings
<p>1. Availability of civil compensation by the offender and financial compensation by the state in the key normative, policy and strategic documents currently in force</p>	<p>Yes, partial. Victims of crime (where the PDVA does not envision any manner of compensation) may claim compensation from the perpetrator either following the general process for claims, as delineated in the CivPC, Part II, or, when the act of violence is categorized as a crime within the meaning of the CC, by bringing in a civil action within the criminal proceedings. Damages suffered are a subject of evidencing per the CPC. Financial compensation by the state is owed in a limited set of cases (only for certain crimes listed in the law) under the relevant provisions of the Support and Financial Compensation for Victims of Crime Act (one-time compensation).</p>
<p>2. Availability of non-financial reparations in the key normative, policy and strategic documents currently in force</p>	<p>Yes, partial. Victims of DV can benefit from rehabilitation, services for recovery, and a limited guarantee of non-repetition (a notable weakness in the PDVA). Additional remedies are available only for grave acts of DV. Not all types of non-financial reparations are provided for under relevant legislation.</p>

Key Indicator	Brief Summary of Findings
1. Availability of state compensation schemes for criminal injuries	Yes, partial. See primary indicator 1. Specific information on budgets was not uncovered in the course of research.
2. Victims' right to claim civil compensation from perpetrators	Yes, partial. See primary indicator 1. The adequacy and proportionality of the compensation with respect to the gravity of the crime was not uncovered in the course of research.
3. Availability of adequate victim compensation awards in the judgments of criminal cases	Not established from the fieldwork or the desk research.
4. Actual reception of compensation	Not established from the fieldwork or the desk research. Some limited evidence from the focus groups suggests that the collection of fines imposed upon the perpetrators is extremely difficult, and collection bodies fail to ensure the timely collection of fines. Statistics from private bailiffs are one source of data in this respect, yet such were not successfully obtained in the course of research.
5. Availability of sufficient resources and services in relation to non-financial types of reparation	No. As discussed in Section 3 on protection, services related to rehabilitation and recovery are rather scarce and are often inaccessible to all potential beneficiaries and individuals in need. Importantly, the limited guarantee of non-repetition in PDVA Art. 5 is a weakness that must be addressed with urgency.
6. Availability of comprehensive and clear information regarding compensations and non-financial types of reparations offline and online	No. No evidence of such information was uncovered in the course of research.

Section 6: Coordination, Monitoring and Data Collection

Collecting information on violence against women is infamously difficult and presents a serious problem all around the world. Indicators linked to such violence fall into Tier III as defined by the Inter-agency and Expert Group on Sustainable Development Goals (SDGs) Indicators, where “No internationally established methodology or standards are yet available for the indicator, but methodology/standards are being (or will be) developed or tested,” and are very slowly moving to Tier II, where an “Indicator is conceptually clear, has an internationally established methodology and standards are available, but data are not regularly produced by countries”(UNSD, 2020). The absence of clean data on GBV and DV in Bulgaria – that is data which is not incomplete, duplicate, incorrect, and inconsistent – has been repeatedly identified as a serious hindrance to prevention and protection measures by CoE, CEDAW, EU, Bulgarian institutions and NGOs (Mijatović, 2020 and Human Rights Council, 2020).

The performed fieldwork proved how critical this lack of reliable data is, especially when it negatively affects frontline practitioners’ everyday work. Among the FG participants and the interviewees there is an unequivocal consensus that two things are urgently needed: 1) a national/central register of DV cases and information pertaining to them and 2) a standardised methodology and expertise for collecting and analysing data related to DGBV. There are institutions (FG2 and FG10) that attempt to collect some data, but are unsure whether it is complete, useful, and accurate, or how it fits into the ‘bigger picture’ of DV in the district and the country. A FG5 participant stressed that they need robust methodological assistance and more trainings on the ethical aspects of collecting and analysing data and acting upon cases of abuse. A FG9 respondent complained that there is a shortage of experts in DGBV who could provide consultations and advise on existing and future measures.

During FG4, FG10 and I17, the specific parameters of the centralised register were debated. For instance, collecting information about the number of restriction orders issued and the number of orders violated would improve institutional efficiency when dealing with repeat offenders. One of the discussed cases involved an individual who committed DV acts in several Bulgarian towns before law enforcement could establish a link between the acts. Another case centred on a restriction order issued using the perpetrator’s current address and not his permanent one, which hindered significantly investigative efforts. According to professionals, keeping a reliable and comprehensive register can not only facilitate fieldwork, but also increase the trust in the institutions’ expertise and competences. A cautionary note, however, reads that any such register should be designed and maintained in compliance with fundamental rights and data protection standards. A FG7 participant wondered whether this archive should include information about a perpetrator’s mental health status (i.e. if they are suffering from a psychosocial disability). As discussed in Section 8 below, stigmatising vulnerable individuals and groups and equating disability with aggressive behaviour should be avoided. Data

collection and analysis efforts¹⁵ should be proportionate to the needs originating from counter-violence measures, processes, and procedures and should closely adhere to the principles of the victim-centred approach and human rights. What appears vital at this point is having a centralised registry of perpetrators and victims that is easily accessible to national, district, and municipal authorities (incl. law enforcement, medical and social services providers, prosecutor's officers and district and regional courts). This register's value could only be amplified by the establishment of a standardised approach to data collection and analysis that provides for adequate data disaggregation (sex, age, ethnicity, religion, educational level, socio-economic status, perpetrator-victim relation, geographic location, etc.).

The need for a well-functioning coordination mechanism, operating at both national and local levels, came up repeatedly during discussions with practitioners (FG2, FG3, FG9, FG7, FG10, I1, and I3). A FG7 participant pointed out that a national coordination mechanism should function under a single ministry (either MoI or the Ministry of Justice); otherwise, the responsibilities of different institutions will remain blurred, which might lead to severe cases of DV being neglected. A coordination mechanism has the potential of solving two identified problems: the lack of clarity about how the duties of the relevant institutions fit together (FG8, FG9, I3, I17) and the uncertainty about the mandates of specific structures, which still exists despite active communication between them (FG1). Still, the conception of a national coordination mechanism will benefit from an in-depth analysis of the concrete expectations that practitioners have about it, as well as from a wide consultation about how they see its functioning – this will surely decrease the risk of disillusionment later on¹⁶.

When it comes to the level and depth of cooperation between local actors, fieldwork has shown they vary across districts and municipalities. FG2 participants think their town serves as a very good example of interinstitutional cooperation, largely due to the deep and adequate involvement of the municipality. In contrast, FG4 participants admit that the representatives of institutions involved in counter-DGBV efforts do not meet regularly, if at all. One of the interviewees (I16) observed that the level of cooperation between various institutions is satisfactory, but the communication between them must

15 As per the proposed changes to PDVA, the centralised register should contain the following information: "acts of domestic violence; data on the victims and the perpetrators and the relationship between them; type of violence - physical, psychological, sexual, emotional, economic, restriction of rights, etc.; duration of violence; damages suffered by the victim; history of violence within the relationship; submitted applications for a protection order or prosecutor's requests for initiating proceedings under Art.8; imposed measures under this act, the Law on the Ministry of Interior, The Child Protection Act and the social services provided under the Social Services Act; individuals and legal entities that are providers of social services and perform activities for prevention of and protection from domestic violence (Council of Ministers, 2021a).

16 Among the important proposed changes to PDVA is forming a National Commission for Prevention and Protection against Domestic Violence within the Council of Ministers. Among its duties will be to develop a coordination mechanism to help and support victims of domestic violence (to be adopted by the Council of Ministers), to organise and coordinate the interaction between the individual departments and implementation organisations, to monitor the effective functioning of the coordination mechanism and to instruct on its application (Council of Ministers, 2021a).

be intensified. This demonstrates that frontline practitioners will value frequent and active exchange of expertise and best practices between peers from other municipalities. Enhanced and more meaningful cooperation can also result in greater trust among them and help alleviate the stress and fear frontline practitioners feel when responding to DV reports (FG4, FG6, FG7, and FG9).

Several themes stood out during discussions about the role of the civil society sector in countering DGBV. Firstly, the presence of active NGOs that provide multiple services and bring other actors together on the territory of the municipality has been described as a positive and valued factor (FG2, FG4, FG10, I6 and I8). However, it was noted that NGOs' activities and services are limited in scope and time, mostly because they are project-based and dependent on external funding – therefore, a) these services should be promoted well when they exist (FG8) and b) it is wrong to rely only on NGOs for countering DV (I1). An interviewee (I9) raised the important point that the still surviving opinion that NGOs 'exist for the purpose of spending grant money' should be done away with. Instead, NGOs should be seen for what they are – frequently, the sole provider of support and protection to victims (I9) and a legitimate, trusted partner in counter-DGBV efforts (I17). This resonates with a recommendation made by a FG8 participant: both NGOs and state and municipal institutions should be involved in consultations on new legislation and policies. The latter are widely overlooked, which should not be the case as this opens the door to burnt-out frontline practitioners, unsure what they are supposed to do, and unfeasible and ineffective policies.

Finally, the fact that when asked about DV, the majority of the respondents started discussing violence against children should not be overlooked. This is understandable for two reasons: firstly, children's safety and well-being is of utmost importance and secondly, Bulgarian professionals seem to have considerable experience working with children-victims of violence. This deeply unfortunate fact could be related to the large number of trafficked (Roma) children and young adults and the undeniable history of abuse in Bulgarian child-care institutions. However, immediately 'switching' to discussions about the need to eliminate violence against children could also signal the need for deeper understanding about the multiple manifestations of DGBV. No matter how contentious and unfamiliar topics like gender inequality and discrimination might still be, the fact is that IPV, abuse of the elderly and of persons with disabilities and sibling abuse should be taken into account. On a positive note, the solid expertise that all frontline respondents seem to have with children-victims of violence and the good inter-institutional cooperation they describe when talking about these cases could be transferred and applied to phenomena such as DGBV.

Table 6: Key Indicators in the Area of Coordination, Monitoring and Data Collection

Key Indicator	Brief Summary of Findings
1. National coordination body responsible for the coordination, implementation, monitoring and evaluation of relevant policies and measures	No. The establishment of such a body is widely debated and among the important proposed changes to PDVA.
2. Availability of a system or a mechanism to regularly collect, analyse, and publish comprehensive statistical data related to DGBV	No. The establishment of such a system or mechanism is widely debated and among the important proposed changes to PDVA.
3. Availability of a mechanism to review, analyse and evaluate the implementation of relevant policies, projects and activities	No. It is worth noting that unlike other annual action plans and programmes, the NPPPDV is not ordinarily followed by a report
1. Reporting of the coordination body	This is not applicable but should be taken into account when establishing the coordination body.
2. Key functions of the coordination body	This is not applicable but should be taken into account when establishing the coordination body.
3. Multi-agency cooperation	Yes, partially. There is no coordination within a larger coordination body, as such a body does not currently exist, but in general, such cooperation is taking place at national and local levels. NPPPDV lists the relevant institutions and provides some delineation of their roles. Chapter 2 of the Regulations for the implementation of PDVA contains some general rules on the activities of the relevant institutions and the interaction between them. In 2010, Mol and the Ministry of Labour and Social Policy (MLSP) published a joint instruction on the procedure for the interaction between the two bodies with respect to the protection against DV (Mol and MLSP, 2010). The Prosecutor's Office also published an Instruction on the organisation of its work with respect to cases of DV (Office of the Prosecutor General of the Republic of Bulgaria, 2018).

Key Indicator	Brief Summary of Findings
4. Compliance of collecting and maintaining data on DGBV with international standards and safeguards.	No. Such compliance should be clearly established, monitored, and evaluated.
5. State support for surveys, research programmes and studies on DGBV	Not fully established from the fieldwork or the desk research.
6. Involvement of CSOs, victims' associations, private sector and other non-state actors actively involved in coordination, monitoring and data collection	Yes. Such structures are involved in coordination, monitoring and data collection. Efforts to include state and municipal institutions and to increase collaboration between them and CSOs should be intensified.
7. Public availability of comprehensive and clear information resulting from data collection and analysis	No. More efforts in this respect are needed.

Section 7: International Cooperation

Bulgaria has enjoyed ample opportunities to take part in initiatives and projects at regional or international levels, since eliminating all forms of GBV is a priority of all institutions and polities where the country is a member – EU, CoE, OSCE, UN, to name just a few. In March 2020, a MoI delegation took part in the final conference of the project *Effective Legal Strategies and Practices for Combating Gender-Based Violence in Eastern Europe* organised by OSCE (Ministry of Interior, 2020). The very initiative under which the present Monitoring Report and the respective Monitoring Methodology are produced involves exchanges of experience in the field of DGBV between Bulgarian stakeholders and experts from two Norwegian organisations – Human Rights Academy and Norwegian Centre for Violence and Traumatic Stress Studies. Bulgarian NGOs such as “Animus Association” Foundation, the Bulgarian Fund for Women, “Demetra” Association, “Gender Alternatives” Foundation, and PULSE Foundation regularly organise conferences, workshops, webinars, and various other events where international experts (practitioners, scholars, journalists, etc.) share their experience and provide some advice on various topics related to DGBV. A well-known shortcoming of this well-established practice is that such events are usually project-based, and therefore their regular holding is conditional upon securing additional funding. On a positive note, for the last decade or so, there have been a good number of projects focusing on DGBV, thus ‘carrying the torch’ from one programme to the next.

However, the fieldwork has shown that international cooperation - even when adopting a rather narrow definition – as an exchange of best practices is not considered by stakeholders as a way to better their own performance, build better expertise within their institutions or, in general, increase the effectiveness of counter-violence measures. While it is understandable that other areas (such as prevention or growing the number of Crisis Centres) are clearly a priority, it is also safe to say that more exposure to international expertise is needed at local level, especially in smaller municipalities.

FG2 and FG9 participants mentioned programmes and practices implemented in other countries as potentially useful and transferrable to the Bulgarian context and their own work. One of them concerns encouraging anonymous reporting of DV on the part of individuals other than the victim. The desk research showed that this is a huge drawback for counter-abuse efforts, as there are numerous cases where colleagues, neighbours, relatives and friends do not report IPV although they have been aware of it for years. The reasons behind non-reporting are manifold – fear of aggression on the part of the perpetrators, concern for the victim’s children or his/her well-being, being unfamiliar with ways to seek help, lack of trust in institutions (especially law enforcement), and a deep conviction that abuse is a private matter and should be dealt with and resolved within the family (see Section 4: Provision of support and protection). Indeed, this is an area where influx of experience into Bulgaria will be valuable – a recent example from Norway is a campaign called *Din plikt* (‘Your Duty’), which reminds Norwegian citizens they have a moral and legal duty to prevent criminal acts, such as sexual assault and DV.

A promising programme that one participant mentioned involves series of lectures in English schools clarifying to students the precise role, responsibilities, and duties of law enforcement officers. Although not entirely elaborated on in the focus group discussion,

such an initiative could be useful, especially in municipalities, towns, villages where trust in the police institution is low or where law enforcement's involvement in DV-related incidents is not fully clear. A FG2 participant recalled a successful past project involving a German partner (name not specified), which centred on the effectiveness of programmes that parents were obliged to attend if their children have witnessed violence at home. Such laconically mentioned initiatives and practices deserve more attention – frontline practitioners should be asked to identify specific areas where they think international cooperation or exchange of know-how is much needed. A good starting point are the ideas for specialised trainings shared during I11 – characteristics of the perpetrator-victim relationship, methods and techniques for working with victims and perpetrators, and methods and techniques for working with the entire family. In all cases, efforts and initiatives related to international cooperation should try to reach as many professionals across the country as possible, instead of concentrating only on the capital or big administrative centres.

Table 7: Key Indicators in the Area of International Cooperation

Key Indicator	Brief Summary of Findings
1. Participation in regional and/or international initiatives to eliminate and respond to DGBV	Yes. The country is a member of numerous international bodies (and their initiatives), which have specifically identified ending GBV as a priority.
1. Seeking support from external sources in order to meet human rights obligations by designing and implementing all appropriate measures required to eliminate and respond to DGBV	Yes, partially. While the state supports or joins (through ministries, agencies, etc.) relevant initiatives, programmes, and activities, which are implemented under projects funded by various donors and funding schemes, it is difficult to ascertain that it actively seeks external financial support.
2. Evidence of implementation of the relevant SDGs, in particular Goals 5 and 16	Yes. In 2020, Bulgaria published its first voluntary national review in compliance with the 2015 UNGA Resolution Transforming our world: the 2030 Agenda for Sustainable Development (UN General Assembly, 2015). It also reports on the implementation of SDGs 5 and 16.
3. Specific engagement with SDG 5 and SDG 16 in legislation and policies on the topic of DV and VAW	No. The relation of existing counter-DV and counter-GBV measures, policies, strategies and legislation to SDG5 and SDG16 should be more clearly established.
4. Availability of comprehensive and clear information regarding the progress and the result of activities supported by external sources or resulting from international cooperation	Yes, where these activities are funded by foreign donors and funding schemes with rigorous reporting requirements.

Section 8: Factors and Risks Underlying DGBV

Since the 1991 adoption of the Constitution of the Republic of Bulgaria, the principle of non-discrimination exists in Bulgarian legislation. However, the list of groups vulnerable to discrimination is non-exhaustive. Article 6 of the Constitution proclaims the right to freedom from discrimination (including based on sex), and equality (1991). The Protection against Discrimination Act (PDA, 2014) regulates the protection against all forms of discrimination and assists in its prevention. Importantly, the non-exhaustive list of discriminatory grounds allows for the addition of new (or new for Bulgaria) categories in the future, thus expanding the scope of the legal provisions. Chapter three describes the powers of the Commission for Protection against Discrimination (CPD) - an independent specialised state body established to prevent discrimination, protect against discrimination, and ensure equality of opportunity. The 2003 Combating Trafficking in Human Beings Act upholds the principle of non-discrimination with regard to all vulnerable groups, including on the grounds of sex.¹⁷ The 2016 Equality between Women and Men Act stipulates that one of the main principles of the relevant state policy is the “equal treatment of women and men and non-discrimination on the grounds of sex” (National Assembly of the Republic of Bulgaria, 2016).

The fieldwork showed that DGBV is rarely discussed at length in relation to direct or indirect discrimination or gender inequality. When such a perspective is adopted, it is usually done by NGO representatives (FG5) who deal with multiple manifestations of discrimination against various groups – people from ethnic or religious minorities, persons with disabilities, the LGBTI+ community, etc. Still, the performed research allows a few important points regarding discrimination within the context of working on and investigating cases of DGBV to be made.

When pondering upon the most prevalent type of DGBV, all respondents agree that this is indeed IPV, where the perpetrator is a man and the victim is a woman. Interestingly, a FG1 participant argues that any omission (on the part of NGOs) to collect data about incidents where the victim is a man and the perpetrator is a woman could be seen as discrimination against the male victim. A FG4 participant acknowledged they had not come across such a case, but hypothesised that when abuse occurs in a same-sex couple, this is probably ‘a form of discrimination’. Similar statements and beliefs could highlight the need to embrace a broader understanding of GBV, recognise the equivalence of different types of violence and realise that IPV could occur in the situation considered traditional – a man and a woman in a marriage.

Indeed, interviewees (I2, I5, I7, and I8) agree that some archaic, but long-standing beliefs about a woman’s ‘traditional role within the family’ underlie discriminatory practices and gender bias. One interviewee (I16) ponders upon a possible link between DGBV and Bulgarian’s national psychology and the psycho-social status of certain groups of the population, whilst another (I8) outlines quite well the common perception that women should be first and foremost caregivers and housewives, while men should

¹⁷ A longer version of this paragraph appears in PULSE Foundation (2020).

be the breadwinners. Often, however, the latter view is indissolubly linked to the idea that women must obey their husbands unconditionally and endure certain hardships (including abuse) for the good of their family and especially their children. The fieldwork solidifies the opinion that Bulgaria is a country where archaic notions about women's places in the family, society and their perceived lack of ability to live independent and fulfilled lives, are still present. Such dispositions lead to discriminatory practices when hiring women (especially on senior positions), promoting work-life balance, providing women with high-quality education and, regrettably, when recognising cases of violence against women. In 2015, a new public administration position – a Coordinator for equality between women and men – was introduced in the country. All executive bodies, centrally and locally, are invited to appoint at least one staff member to fill in this role. Fieldwork has shown that the work of these Coordinators is rarely mentioned with respect to DGBV. This possibly needs to be corrected, as such experts might serve as a good practice for anti-discriminatory policies and strategies aimed at achieving gender equality, especially at local level.

Adequate anti-discrimination measures should also involve eliminating less obvious or more invisible forms of discrimination. Reflecting upon services for children-victims of violence, an FG3 participant argued that other factors such as homosexuality, disability, substance abuse, etc. make providing these services and working with certain victims more difficult. Thinking about sexual orientation as an 'aggravating circumstance', putting it side by side with substance abuse or a condition that causes disability, is quite problematic and can result in discriminatory practices and bias. When talking about specific cases of DGBV, I8, FG8, FG4, FG2, FG9 respondents contemplated the interdependency between substance abuse (mostly alcohol) and the occurrence of violence. A FG participant came close to equating alcohol abuse with 'lower IQ'. Such assumptions and deductions are problematic and can cause inadequate service provision, stigmatisation, and victimisation. Furthermore, the idea that curing addiction will eliminate DGBV (because addiction causes violence) should be approached with caution. While substance abuse is certainly a risk factor driving violent behaviour, no direct cause-and-effect link between the two has been established (Center for Substance Abuse Treatment, 1997).

Therefore, all counter-DGBV efforts should have as an underlying presupposition not only that discrimination, gender inequality and GBV are inextricably linked and should be eliminated in their entirety, but that GBV does present a form of discrimination. This argument is not new and appears repeatedly in international documents and statements by international bodies. For instance, the European Commission (n.d.) explicitly declares that "Violence against women is understood as a violation of human rights and a form of discrimination against women and shall mean all acts of GBV that result in, or are likely to result in physical harm, sexual harm, psychological, or economic harm or suffering to women". General Recommendation No.19 of the CEDAW Committee asserts "that violence against women is a form of discrimination, directed towards a woman because she is a woman or that affects women disproportionately. This violence seriously inhibits women's ability to enjoy rights and freedoms on a basis of equality with men" (OHCHR, 2021). Some respondents are aware that a connection between violence and discrimination exists – one of the interviewed experts (I13) asserts that in Roma communities there is discrimination and GBV, as women are considered inferior to men. During FG4, violence

based on sexual discrimination was recognised as a manifestation of discrimination, but GBV was not. Once again, this highlights the need to shift the discourse to GBV as an overarching phenomenon.

Integrating modules, lectures, educational materials, etc. on the importance of rejecting personal pre-conceptions, systemic gender bias, gender stereotypes, gender inequality and including good approaches and practices to do so in school curricula, higher education programmes and trainings for law enforcement, magistrates, social and medical workers, and policy-makers is a vital first step in combatting GBV as a form of discrimination.

Table 8: Key Indicators in the Area of Factors and risks underlying DGBV

Key Indicator	Brief Summary of Findings
1. Legal and policy measures specifically addressing factors that heighten the risk of DGBV	Yes, partially. Certain sections of the existing legislation (PDA, Equality between Women and Men Act, Combating Trafficking in Human Beings Act, Persons with Disabilities Act) can be interpreted to address age (children), disability, race, nationality, religion, ethnicity, and sex work vulnerabilities, but these are not ordinarily tied to DGBV. The Ombudsman of the Republic of Bulgaria publishes annual reports, which discuss discrimination as well (Ombudsman of the Republic of Bulgaria, n.d.).
2. Reports or studies that are commissioned or produced by the state	Yes. The MLSP prepares, and the Council of Ministers approves, an annual report on the equality between women and men in Bulgaria. The CPD publishes an annual report detailing its work on the complaints of discrimination received from citizens and legal entities (CPD, n.d.).
3. Discussions/legislative work to amend legal provisions potentially discriminatory against women	Not established from the fieldwork or the desk research.
4. Efforts on the part of CSOs and private sector (at the state’s initiative and/or with state support) to prevent gender-based discrimination and promote gender equality	Not established from the fieldwork or the desk research.

Section 9: Intersectional Vulnerabilities

Intersectionality and intersectional vulnerabilities remain an area largely unaddressed by the normative, policy and strategic documents in force in Bulgaria. Notably, the notions of intersectionality and intersectional vulnerabilities do not have an official translation into Bulgarian language and are not found in any of the relevant documents on the topic of DGBV this analysis has examined. Nevertheless, there is limited evidence that the *lex lata* does consider certain social groups as more vulnerable, and assigns more severe punishments for acts of violence that fall within the DGBV spectrum. One such group is children (under 18 years of age, containing minors under 14 years of age, and youth 14-18 years of age). Art. 8 PDVA provides that individuals over the age of 14 may file an application for a Protection Order themselves, while ordinarily, relatives by consanguinity, guardians and the Director of the National Social Assistance Directorate may file for the benefit of any underage person. Furthermore, the CC, in Chapter VIII (Debauchery), provides for punishments of greater severity for sexual violence (including rape, solicitation for prostitution, trafficking, kidnapping for the purposes of trafficking or sexual exploitation abroad, solicitation/ compulsion to partake in sexual activities, and other forms of sexual violence) upon a minor (under 14 years of age), and upon female individuals under the age of 18. Punishments in the form of deprivation of liberty are also provided for in cases of creation, dissemination, collection and/or exhibition of pornographic materials or other information with, about and to a person under the age of 18 which may lead to them suffering acts of sexual violence. Importantly, the CC contains specialized provisions for children (under 18 years of age) who engage in “prostitution”, detailing slightly greater punishments in comparison to children in the general case (see for instance Art. 157(1-3)). Forced marriages / forced marital cohabitation, an internationally recognised form of GBV, are also punishable by longer periods of liberty deprivation in the case of under-age individuals (Art. 177 and Arts. 190-192, respectively).

Other groups partially covered by the legislation include people with disabilities. For instance, PDVA Art. 8(4) provides that the Social Assistance Directorate may file a Protection Order application for the benefit of individuals with disabilities and individuals under incapacity mandates; and Art. 11(3) in relation to court fee waivers; as well as CC provisions pertaining to sexual violence upon individuals “who cannot understand the essence or meaning of the act”, possibly including some forms of disability, with concomitantly greater punishments, while the People with Disabilities Act (2019) itself remains silent on the topic of violence against this group in particular. Violence on the grounds of race, nationality and ethnicity is punishable per Art. 162(2) of the CC, with no specification about the type of the violence, and no mention of DV aggravating circumstances. As posed above, the CC also penalizes acts of sexual violence against individuals engaged in prostitution more severely. Other groups, such as LGBTI+, migrants and refugees, as well as individuals at the intersection of several characteristic of vulnerability, are not presently included in the legislation on DGBV.

The data collected in the fieldwork activities clearly reflects the limited inclusion of intersectional vulnerabilities in the legal and policy framework and the consequentially limited understating of what the phenomenon denotes and how it transpires in people’s

lived experiences. Reflections on this thematic area are sporadic, laconic, and unsystematic. As noted elsewhere, violence against children was viewed as a “safe topic” (FG3, FG5, FG6, FG8, FG9, FG10, I13), owing to the existence of a Coordination mechanism and the higher number of normative and practical resources available to professionals in such cases. It was rarely, however, that respondents spoke of violence against girls (gender-age intersection) or violence against older people (FG2, FG4, FG6, FG8, I3). Intersections with ethnicity characteristics were made, positioning Roma women and children as individuals at higher risk of DGBV, both implicitly and explicitly (FG2, FG3, FG4, FG6, FG7, FG10, I3, I11, I13, I14, I16). At the crossing of age and ethnicity, respondents briefly mentioned early marriages, yet without necessarily flagging them as acts of GBV (FG6). Importantly, however, some respondents seemed to perceive DV as a normal, trivial aspect of life in the so-called closed-off and isolated Roma and other ethnic (Turkish and migrant) communities (FG3, FG5). There is also limited evidence that those communities are seen as hotspots of more serious types of violence (FG4), although this thesis is not developed further in the discussion. Intersections with mental disability are briefly noted in some focus groups and interviews as both a factor that increases the risk of victimisation and the risk of perpetration (FG5, FG10, I3), while factors like sexual orientation and/or gender identity (understood rather as gender performance in FG5) (FG4, FG5, FG10, I3) are mentioned without any elaboration. One focus group also laconically highlights the vulnerability to violence of the so-termed “children left behind” (CLBs)¹⁸ (FG5). In terms of violence perpetration risk factors that may also be viewed as vulnerabilities, respondents make mention of alcohol consumption, substance abuse, economic hardship, low educational and social status, alongside the role of traditional and customary dispositions, including patriarchal norms (FG2, FG4, FG5, FG8, FG9, I3, I5, I8).

At this stage, participants in the fieldwork activities experience difficulty in providing more comprehensive opinions on the matters of intersectionality, although they do exhibit ample understanding that certain sections of society are at higher risk of DGBV. The constrained understating of GBV (see Section 1: General legislative and policy measures and Section 2: Prevention) also precludes full-bodied awareness about intersectionality, and about individuals that may reside upon the intersection of multiple vulnerabilities. Reflections on a group-based understanding of vulnerability (e.g. the elderly, people with psychological disabilities, children) continue to overpower the individual-based understanding (e.g. a transsexual woman of Roma origin, aged 16), characterizing the general area of intersectionality in DGBV as in dire need of progressive development.

¹⁸ For more information on this term, consult UNICEF (n.d.).

Table 9: Key Indicators in the Area of Intersectional Vulnerabilities

Key Indicator	Brief Summary of Findings
1. Discussion of intersectional vulnerabilities in the normative, policy and strategic documents	No. Intersectionality and intersectional vulnerabilities remain unknown to Bulgarian legislation and policy documents. Certain sections of the existing legislation can be interpreted to address age (children), disability, race, nationality and ethnicity, and sex work (individuals engaged in prostitution per the CC) vulnerabilities, but these are not ordinarily tied to DGBV.
2. Factors of vulnerability present in legislation: age, ethnicity/status, disability, sexuality/ gender identity, social status, other groups	No. Not as “factors of vulnerability” per se. See primary indicator 1.
3. Policies and measures designed for and targeted at individuals with intersectional vulnerabilities	Not established from the fieldwork or the desk research.
4. Consideration of intersectional vulnerabilities during court proceedings	Not established from the fieldwork or the desk research.
5. DGBV services designed to respond to intersectional oppressions	Not established from the fieldwork or the desk research.
6. Consideration of vulnerable groups’ perspectives and needs in state legislative and policy-making processes	Not established from the fieldwork or the desk research.
7. Responsiveness of the legal, policy and strategic framework to new vulnerabilities, at-risk groups and violence	Not established from the fieldwork or the desk research.

Section 10: “New” Types of DGBV

Bulgarian legislation and policy documents remain silent on more specific or “new” types of GBV and DV that have international recognition, such as hate speech and hate crime against women and/or based on gender, sexuality or gender performance/identity, online and technology-facilitated violence, types of violence that are not characteristic to the national setting, such as female genital mutilation (FGM) and crimes of honour, religion-related violence, etc. As far as national legislation that recognizes and criminalises hate speech and hate crimes (CC Arts. 162-164), it does so with no reference to sex, gender, sexual orientation, gender identity and gender performance. The PDA (2006), a part of civil legislation, only provides protection in relation to “sex” in a purist biological sense, and makes no mention of hate speech and hate crime. It does, however, address acts of harassment of general and sexual nature, which can in principle cover instances of hate speech (PDA Art. 5, defined in Supplementary provisions §1-2). Harassment is, notably, not criminalized in the CC. In terms of specific types of violence arising from technological development, the Bulgarian CC includes some provisions on the so-called “computer crimes” (Chapter 9a) and recognizes the technological element in certain acts of sexual violence (Section VIII: Debauchery), yet no gender-specific vulnerabilities are addressed. It is possible for female children to benefit from legal protections and justice in such cases, but not adult women. This omission is further emphasised by reference to the jurisdiction and powers of the responsible institution for investigating ICT-related crimes; the Mol’s General Directorate for Combatting Organised Crime (GD-COC). Notably, the Directorate’s Cybersecurity unit does not investigate ICT-related crimes related to women.¹⁹ With respect to the rest of the types of GBV and DV, the law remains silent.

Respondents in the present study offered no specific insight into the way the legal, policy and institutional framework deals with cases of “new” types of violence. Some participants spoke about intersections with sexual orientation, ethnicity and religion as factors for increased risk of violence (FG2, FG3, FG4, FG5, FG6, FG7, FG10, I3, I11, I13, I14, I16), yet specific manifestations of abuse are not named and discussed. None of the participants in the study addressed problematics such as ICT-facilitated violence or crimes of honour.

¹⁹ For more information on the relevant activities of the Cybersecurity unit, see Mol (2021a).

Table 10: Key Indicators in the Area of “New” Types of Violence

Key Indicator	Brief Summary of Findings
1. Discussion of new types of DGBV in the normative, policy and strategic documents	No. If such applicability may be established, it is a matter of judicial margin of appreciation in interpreting the law.
2. Criminalisation of any of the types in point 1	No. Not explicitly. See Indicator 1.
3. Policies and measures (both state- and NGO-funded) specifically designed for and targeted at addressing new types of violence	Yes, but limited. State policies and measures targeting new types of violence were not established from the fieldwork or the desk research. Some examples of NGO initiatives were identified, e.g. the Center for Sustainable Communities Development’s crimes of honour project that concluded in 2021 (CSCD, n.d.). Internet safety campaigns for adult women were not established from the fieldwork of the desk research.
4. Inclusion of special provisions on online and technology facilitated DGBV in media and Internet related legislation	No. Media law in Bulgaria does not address online and technology facilitated DGBV.
5. Availability of redress mechanisms for individuals who have been victimised by online and technology facilitated DGBV	Not established from the fieldwork or the desk research.
6. Availability of significant studies and data collected on new types of DGBV	Not established from the fieldwork or the desk research.

Decisive steps must be taken with respect to all thematic areas explored. While some progress was made in terms of legislative changes and policy adoption, much remains to be done, especially when it comes to preventing acts of violence and ensuring the victims’ safety, their physical, mental and emotional integrity and well-being. Municipalities should be more active in driving counter-DGBV efforts, while communication among the relevant actors should be optimised and intensified, both nationally and locally. The calls for more financial resources and expertise should go hand in hand with the readiness to embrace a victim-centred and intersectional approach to stopping DGBV. Continuous knowledge and practice exchanges with national and international peers and participation in various international initiatives should be encouraged. The data, insights, and experiences gathered during both the desk research and the fieldwork will serve as the basis for

specific recommendations that call for clear and research- and evidence-based policies for tackling different forms of GBV.

Intersectionality, and further, intersectional vulnerabilities remain an area largely unaddressed by the normative, policy and strategic documents in force in Bulgaria. Notably, the notions of intersectionality and intersectional vulnerabilities do not have an official translation into Bulgarian language and are not found in any of the relevant documents on the topic of DGBV this analysis has examined.

Importantly, all actors involved in countering DGBV (frontline workers, experts, and media) should take further steps towards a deeper understanding of what such violence entails. It should not be implicitly normalised and regarded as a fact of life, let alone as a trivial aspect of the lifestyle of so-termed closed-off, isolated, and disadvantaged communities (such as Roma, the Turkish minority, or those suffering from substance abuse). Adopting the view that DGBV is a harmful and unacceptable violation of one's core human rights will improve the ability to provide services and assistance, encourage victims to seek help and boost much needed efforts in the area of prevention.

5. Conclusion: The Case for Eliminating Gender Inequalities and Bias

In November 2021, Bulgaria was shocked by the brutality of the assault on a 17-year old girl, who was raped and set on fire by a relative (Nova.bg, 2021a). A few days later, on November 25th, 2021, a protest in support of preventing and combatting violence against women, backed by numerous NGOs and advocacy organisations and many citizens, took place in the country's capital, Sofia. One strong factor behind the march was the murder of the 33-year-old Evgenia Vladimirova by her husband, who was aided by his father to dispose of the victim's body and cover up the crime (Mitov, 2021). Evgenia is only one of the victims of femicide in Bulgaria – whilst their number for 2021 is yet unknown, in 2020 it was 27 (Nova.bg, 2021b). Indeed, the adoption of full and appropriate definitions of femicide, GBV, and gender-based hate crimes into the PDVA and the CC, as well as of other measures – all mentioned in this Report and related to data collection, prevention, monitoring, improved services – was among the protesters' main demands requiring urgent action.

However, it would be unrealistic to expect the effortless introduction and successful implementation of such measures without simultaneously eliminating gender bias, promoting gender equality and espousing gender mainstreaming in institutional plans, school curricula, and various policies and processes. The notion that DV is a shameful private matter, acceptable in 'traditional' family settings, should be eradicated. The links between GBV and unequal power relations, gender inequality, and social norms and structures that perpetuate abuse is yet to be explored in depth and are not commonly recognised. DGBV should be brought into the light for what they are – a grave matter of public concern and a social - not personal - problem.

The main objective of this Monitoring Report is to demonstrate the need for decisive and timely measures in the words of those who face abuse everyday – frontline workers and practitioners. Hopefully, it will be one of many reports to follow that can assist policy-makers and experts in designing, implementing, monitoring, and evaluating legislation, policies, and strategies related to DGBV in Bulgaria.

6. Policy Recommendations

Based on the collected data and the performed analysis, the authors are proposing the following policy recommendations:

- ▶ Bulgaria should ratify the Istanbul Convention and adopt all its provisions;
- ▶ The National Parliament should deliberate on the PDVA Draft Amendment Act (Ministry of Justice, 2020) and adopt its provisions at the earliest opportunity. Proposed amendments related to definitions, a centralised register for DV cases, court application deadlines, a National Commission on Domestic Violence, etc. should be implemented as soon as possible after adoption;
- ▶ Lawmakers should introduce a comprehensive definition of GBV and acknowledge that GBV is a form of discrimination and a violation of the rights, freedoms and social standing of women, girls, LGBTI+ individuals, and other vulnerable persons;
- ▶ State, district, and municipal actors should carry out and support targeted, tailor-made campaigns to raise public awareness about the gravity of DGBV and the need to eradicate it. Such campaigns should:
 - △ normalise the discussion surrounding the term gender and discontinue disinformation and public opinion manipulation;
 - △ be victim-centered, encouraging victims to seek assistance and support;
 - △ be informative and prompt citizens (especially relatives, friends, colleagues, neighbours) to report cases of violence they witnessed;
 - △ actively seek the involvement and the support of the NGO sector, including victims' associations, the media and the private sector;
 - △ be co-designed together with practitioners, experts, and, where possible, victims, thus ensuring that the campaigns' contents and messages are adequate, meaningful, and truthful;
 - △ always refer to the need to promote gender equality and eliminate gender bias and gender stereotyping.
- ▶ Policymakers should formulate comprehensive policies, programmes, and strategic documents to counter DGBV. Such documents and the measures they envision should:
 - △ be detailed and clear about their scope and reach, particularizing the responsible institutions, the exact nature of their duties and responsibilities, the roadmaps for interinstitutional cooperation, etc.;
 - △ be based on comprehensive analysis, including intersectional analysis;
 - △ be subject to periodic analysis, monitoring, evaluation, and review. Preferably, regular monitoring reports should be publicly available;
 - △ strongly encourage the exchange of know-how and good practices among various actors and between different districts and municipalities;

- △ be formulated after consultations with civil society (including victims' associations or individual victims), media, scholars, researchers, the private sector, but also and importantly, those directly involved in the implementation of actions and measures – including but not limited to law enforcement, healthcare, social service, education and criminal justice professionals);
 - △ follow a victim-centered approach, comply with key human rights instruments and take into account intersectional vulnerabilities;
 - △ employ the strategy for mainstreaming gender in all public policies, programmes, and projects. This will ideally require the involvement of gender experts throughout the entire policy cycle.
 - △ promote equality, tolerance, and non-discrimination through integration in school curricula and university programmes.
- ▶ The design and implementation of programmes and strategies to counter all forms of DGBV should occur not only on national, but also on local level (district and municipality). This could empower local actors and provide them with more and better tools to tackle DGBV, thus taking into account local specificities and tendencies. Such programmes and strategies should be monitored, evaluated, and reviewed periodically, ideally following consultations among local actors and exchange of know-how at national and international levels;
- ▶ National and local actors should develop various protection, support, and prevention services and improve the capacity and the quality of existing ones. These include, but are not limited to: shelters, crisis centres, and psychological consultations with victims, rehabilitation programmes for perpetrators, compensation and reparation schemes, and programmes helping victims heal, reintegrate in society and live a healthy and fulfilling life. Such services should:
 - △ be established in law and low-cost/free;
 - △ be easily accessible, in the sense that there are no prohibitive impediments for certain sections of society due to factors such as Information and Communications Technologies (ICT) capabilities, literacy, language skills, access to a particular device, and place of residence;
 - △ be included in the prevention and awareness-raising campaigns. Victims or those at risk should be familiar with these services, as lack of awareness is often a driver of under-reporting of violence, and unwillingness to seek help.
- ▶ Trainings and education programmes destined for all institutions implementing counter-measures should continue to take place. Trainings destined for professionals (policymakers, prosecutors, law enforcement, social workers, teachers, healthcare professionals, etc.) should ideally be co-created, involving significant input from the groups they are targeting. This means that the topics, contents, and format of such trainings should be tailored to the pre-existing needs of the group in question.
- ▶ A centralised register for cases, victims and perpetrators of DV should be established in law. It is highly recommended that it:
 - △ is available to all relevant institutions (police, courts, prosecutors' offices,

public social service providers, hospitals and healthcare institutions, etc.);

- △ enables the relevant institutions to input, search for, and utilise data contained within the Register;

- △ includes information on the following: open and closed cases, running pre-trial proceedings, Protection and Immediate Protection Orders in force and expired, measures of protection in force, punishments ordered by the competent courts, perpetrators, victims, etc.;

- △ serves as a key and reliable source for drafting annual reports on the national, district and municipal levels. Thus, it offers disaggregation by relevant demographic indicators such as sex/gender, age, place of residence, educational level, etc., alongside other indicators of interest such as the relationship between the victim and the perpetrator, any intersectional vulnerabilities the victim suffers from, the particular type of violence perpetrated, etc.;

- △ complies with human rights principles and includes a well-developed mechanism to prevent misuse, discrimination, and re-traumatisation.

- ▶ Effective prosecution, commensurate punishment, and mandatory rehabilitation for perpetrators should be prioritised to counter re-offending;

- ▶ Different types of compensation and non-financial remedies for victims ought to be considered and made available under the law and effectively applied in every admissible case;

- ▶ Establish in law the provision of reporting services for victims and individuals that have knowledge about victims of DV. Such services should:

- △ be maintained and operated through sufficient state funds;

- △ be simultaneously technologically advanced and user-friendly;

- △ run round the clock and be accessible to all individuals, regardless of factors such as ICT capabilities, literacy, language skills, access to a particular device, place of residence, extent and nature of vulnerability;

- △ be integrated with law enforcement and emergency systems and foster an immediate reaction from first responders, who are trained to use them at all times;

- △ be designed in a way that allows victims and witnesses to report violence freely and safely, without fearing retribution (i.e. anonymity must be safeguarded and additional protection measures must be in place).

- ▶ Lawmakers should perform a comprehensive overhaul of the legislation on the collection and admissibility of evidence of DGBV before the competent courts. This process should:

- △ take into account novel technological developments;

- △ eliminate, to the greatest extent possible, any doubt about which types of evidence are admissible in cases of DV;

- △ strongly consider making electronic materials (e.g. video and audio recordings, chat screenshots, photographs, etc.) admissible as evidence per se,

and not merely as information that may support witness statements;

- △ allow victims to bring materials that corroborate their statements before the court where witnesses are absent;

- △ repeal the dated requirement of unequivocal guilt, requiring victims of “systemic violence” to present undisputable evidence of three and over acts of DV, as to qualify under the aggravated circumstance provisions;

- △ allow victims to be accompanied by a trusted person during the investigation phase and in court proceedings;

- △ abolish the flawed practice of having victim and perpetrator meet in person during court proceedings, oftentimes in violation of a Protection Order

- △ adopt a victim-sensitive approach to investigation, statements taking, and forensic examinations, acknowledging the vulnerability of victims and their risk of retraumatisation.

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Annex

List of Institutions and Organisations Contacted with a Written Information Request

- ▶ Institutions at national, district and municipal level
 - △ Bulgarian Chamber of Private Enforcement Agents
 - △ Commission for Protection against Discrimination
 - △ Council of Ministers
 - △ District Administrations (28 districts)
 - △ District and regional courts (28 districts)
 - △ District and regional prosecutor's offices (28 districts)
 - △ Ministry of Education
 - △ Ministry of Finance
 - △ Ministry of Foreign Affairs, National Coordination Mechanism for Human Rights Ministry of Justice
 - △ Ministry of Health
 - △ Ministry of Interior, General Directorate National Police
 - △ Ministry of Interior, National Coordinator Domestic Violence
 - △ Ministry of Justice
 - △ Ministry of Labour and Social Policy
 - △ Municipal administrations (266 municipalities)
 - △ National emergency line 112 - Ministry of Internal Affairs
 - △ Ombudsman of the Republic of Bulgaria
 - △ Prosecutor's Office, Republic of Bulgaria
 - △ Regional Directorates of Education (28 districts)
 - △ Regional Directorates, Ministry of Interior (28 districts)
 - △ Regional Directorates, Social Assistance (all directorates in the country)
 - △ Social Assistance Agency
 - △ State agency for Child Protection
- ▶ District and national media (28 districts)
- ▶ Hospitals and medical professionals (28 districts)
- ▶ Emergency care centers (28 districts)
- ▶ Civil Society Organisations

- △ “Animus Association” Foundation;
- △ “Bulgarian Center for Gender Studies” Foundation
- △ “Nadia Center” Foundation
- △ “Nadia Center” Foundation – Ruse branch Open Door Center” Foundation
- △ Adaptation Association
- △ Association “Alliance for Protection against Gender-Based Violence”
- △ Association “Dynamics Center”
- △ Association “Knowledge Success Change”
- △ Association “Center for Constructive Justice”
- △ Association “Demetra”
- △ Association “Naya”
- △ Bilitis Foundation
- △ Bulgarian Fund for Women
- △ Bulgarian Red Cross
- △ Caritas Bulgaria
- △ Council of Refugee Women in Bulgaria
- △ Crime Prevention Fund – IGA;
- △ CVS-Bulgaria
- △ Emergency lines for victims of DGBV; ANIMUS, A21, Association “Alliance”, 1611 - for children
- △ Foundation “Gender Alternatives”
- △ Foundation “H&D Gender Perspectives”
- △ Foundation “PULSE”
- △ National Association of General Practitioners in Bulgaria
- △ National Association of Municipalities
- △ National Associations of Hospitals in Bulgaria
- △ National Centre for Mental Health
- △ National Centre for Public Health and Analysis
- △ National Institute of Justice
- △ National Network for Children
- △ National Office for Legal Assistance
- △ Non-profit association “Youth Forum 2001-Razgrad”

- △ Roma Standing Conference
- △ Social Activities and Practice Institute
- △ SOS Families at Risk Foundation
- △ UNHCR-Bulgaria
- △ UNICEF, Bulgaria Office
- △ Union of Women Lawyers in Bulgaria
- △ Women's Association "Ekaterina Karavelova"

FROM VICTIM BLAMING TO VICTIM SENSITIVITY

A State of the Art Analysis of Domestic and
Gender-Based Violence in Bulgaria

2022

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The ongoing COVID-19 pandemic led to worldwide increase of gender-based violence, and domestic violence in particular. Many women and other vulnerable persons – children, the elderly, and people with disabilities – were confined to their homes during lockdowns and fell victim to physical and psychological abuse. Online violence is on the rise as well, since many people are forced to spend more time online. Bulgaria is no exception to these developments. Whilst policies and strategies were adopted to counter gender-based and domestic violence, more efforts are urgently needed.