



CENTER FOR
THE STUDY OF
DEMOCRACY

Invisible Chains

Mapping the Links Between Corruption and
Gender-Based Violence against
Women in Bulgaria

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Gender-Based Violence against
Women in Bulgaria**

This report aims at unveiling the gender perspective of corruption. It marks one of the first analytical efforts to map the links between gender-based violence (GBV) against women and administrative corruption in Bulgaria. Women, especially those from marginalised groups, are disproportionately impacted by both GBV and corruption, which undermines their trust in public authorities, discourages them from seeking protection, support and justice, and perpetuates cycles of abuse.

While corruption dominates the political and public debate in Bulgaria, its links to GBV are too often overlooked. The most devastating effects of corruption are often disproportionately borne by the most vulnerable. Despite concerted, EU-empowered efforts to improve the rule of law and institutional measures aimed at safeguarding vulnerable groups, (domestic) violence against women remains pervasive in Bulgaria. And corruption is one of the most potent enablers of such kind of violence.

This publication draws upon sets of victimisation studies on administrative corruption and GBV to explore the links between the two phenomena and provide insights for frontline responders on how to address this nexus. The analysis offers a regional (NUTS3) perspective, featuring for the first time a combined index of vulnerability to GBV that comes together with a map of the regional vulnerability distribution across Bulgaria's 28 administrative districts.

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LIST OF ABBREVIATIONS

CMS	Corruption Monitoring System
CSD	Center for the Study of Democracy
CSO	Civil Society Organisation
EU	European Union
FATF	Financial Action Task Force
GBV	Gender-Based Violence
LGBTI	Lesbian, Gay, Bisexual, Transgender, Intersex
MACPI	Monitoring Anti-Corruption Policy Implementation
NUTS2	Nomenclature of Territorial Units for Statistics 2
NUTS3	Nomenclature of Territorial Units for Statistics 3
U.S.	United States

VICTIMS OF SYSTEMIC CORRUPTION AND GENDER-BASED VIOLENCE

EU's rule of law principles are intended to ensure that all citizens are treated fairly and equally. Yet, systemic corruption and state capture in Bulgaria¹ have eroded these principles, disproportionately affecting marginalised and vulnerable groups. Many citizens – particularly women from rural or impoverished areas and other marginalised communities – often wrongly perceive corruption as a distant issue that primarily involves the powerful or wealthy.² Corruption is often seen as a victimless crime, disconnected from the everyday life of ordinary people, which pushes voters into the hands of ever more populist leaders, craving a strong hand approach, wrongly believing it would restore justice.

Unchecked, systemic corruption and state capture in Bulgaria have contributed to the widespread public mistrust in institutions and growing pessimism about the feasibility of successful anti-corruption efforts in the country.³ Two recent high-profile examples of international acknowledgement of fundamental failures of Bulgaria's anti-corruption institutions underscore such distrust and pessimism. One of them was the grey listing of Bulgaria by the Financial Action Task Force (FATF) due to insufficient evidence of effective enforcement of anti-money laundering legislation. The other was the country's record number of designations under the U.S. Global Magnitsky Act.⁴ The 2024 EU Rule of Law Report also highlighted, among others, the low trust in the judicial system and ineffective anti-corruption policy and legal measures.⁵

In this context, people living in poverty or/and rural areas or belonging to other marginalised groups tend to develop deep distrust of anyone in power, viewing all public institutions as corrupt. This distrust discourages people from seeking justice or assistance, especially in cases involving gender-based violence (GBV), where victims depend heavily on the integrity of the law enforcement and justice systems for protection and redress. Data from the Corruption Monitoring System (CMS) suggests that this issue worsens over time as 66.8% of the Bulgarian citizens in 2023 believed that corruption cannot be substantially reduced – showing an increase in the distrust in public bodies compared to 2002 when 46.1% showed such anti-corruption pessimism.⁶

¹ Center for the Study of Democracy, *The State of Capture: The Elusive Quest for Anti-Corruption Results*, Policy Brief No. 144, April 2024.

² UNDP, *Seeing Beyond the State: Grassroot Women's Perspectives on Corruption and Anti-Corruption*, New York, United Nations Development Programme, 2012.

³ Center for the Study of Democracy, *The State of Capture: The Elusive Quest for Anti-Corruption Results*, Policy Brief No. 144, April 2024.

⁴ Center for the Study of Democracy, *The State of Capture: The Elusive Quest for Anti-Corruption Results*, Policy Brief No. 144, April 2024.

⁵ European Commission, *2024 Rule of Law Report: Country Chapter on the rule of law situation in Bulgaria*, 2024.

⁶ Center for the Study of Democracy, *The State of Capture: The Elusive Quest for Anti-Corruption Results*, Policy Brief No. 144, April 2024.

In addition, a sectoral analysis of state capture vulnerabilities reveals that district and municipal administrations are among the institutions with the highest levels of lack of integrity and impartiality, as well as the lowest effectiveness in implementing anti-corruption policies.⁷ This reinforces the belief within local communities that corruption is so widespread that seeking assistance from institutions is futile and might even be counterproductive.

At the policymaker level, the reluctance to act is illustrated most glaringly by Bulgaria's continuous refusal to ratify the Council of Europe Convention on preventing and combating violence against women and domestic violence (the Istanbul Convention), despite the high prevalence of GBV in the country. Notable cases of law enforcement inaction linked to ongoing domestic violence incidents have further deepened public distrust in policymaking institutions. This is especially damaging given that institutional involvement is critically needed to protect vulnerable individuals.⁸

⁷ Galev, T., and Gerganov, A., *Assessing State Capture Vulnerabilities at the Sectoral Level: Integrating Innovative Monitoring Instruments*, Sofia: Center for the Study of Democracy, 2021.

⁸ Yordanova, T., 'Woman maimed after three-hour jealousy beating, rapist arrested three days later' [„Жена е осакатена след тричасов побой от ревност, насилникът - задържан три дни по-късно“], *Nova*, 20 September 2024.

GENDER ASPECTS OF CORRUPTION

Understanding the gender aspects of corruption is crucial for developing adequate policy responses targeting the intersection between corruption and GBV. Corruption disproportionately affects women, particularly those living in vulnerable and marginalised communities.⁹ Addressing corruption through a gender lens can be essential because it can also allow policymakers, academics, and civil society practitioners to analyse how gender roles, social norms, and structural inequalities influence individuals' exposure to corruption. A gender-responsive approach seeks to examine how women, men, and gender-diverse individuals are differently impacted by corruption. By incorporating this perspective, the government can develop policies that are inclusive and effective in reducing corruption's harmful effects on the most vulnerable populations. Moreover, research into the intersection of corruption and gender is still nascent, particularly in Central and Eastern Europe and Bulgaria, making it essential to push the boundaries of this discourse.

A central reason for exploring gender and corruption together lies in the fact that corruption is often perceived as a victimless crime. The perception of corruption as an issue affecting only the elites or those in power is deeply flawed. Corruption's consequences are most acutely felt by those furthest removed from power, particularly people living on the socio-economic margins. The impact of corruption is not only economic, it affects the provision of public services, the protection of fundamental rights, and the access to justice, among others. When public institutions are compromised by corruption, it would be women, particularly those living in poverty or facing systemic discrimination, who can suffer the most. This is because women are often more dependent on public services, more likely to encounter barriers to justice, and more vulnerable to exploitation in corrupt systems.¹⁰ This vulnerability makes the exploration of the gender-corruption nexus also a matter of justice and equity before the law.

To address this important disconnect, policymakers should adopt a gender-responsive approach to anti-corruption measures. This involves not only recognising the differential impacts of corruption on women but also ensuring that women's voices are included in the design, implementation, and evaluation of anti-corruption strategies. For instance, anti-corruption programmes should prioritise the needs of women in vulnerable situations, especially of victims of GBV, by ensuring that public services are accessible, safe, and free from corrupt practices.

The studies of gender and corruption explore the issue on several levels, starting with the question of whether women are more vulnerable to corruption than men. For a long time, the prevailing view was that women are inherently less corrupt, largely due to their socialisation into roles that emphasise care, empathy, and responsibility.¹¹ Studies argue that women

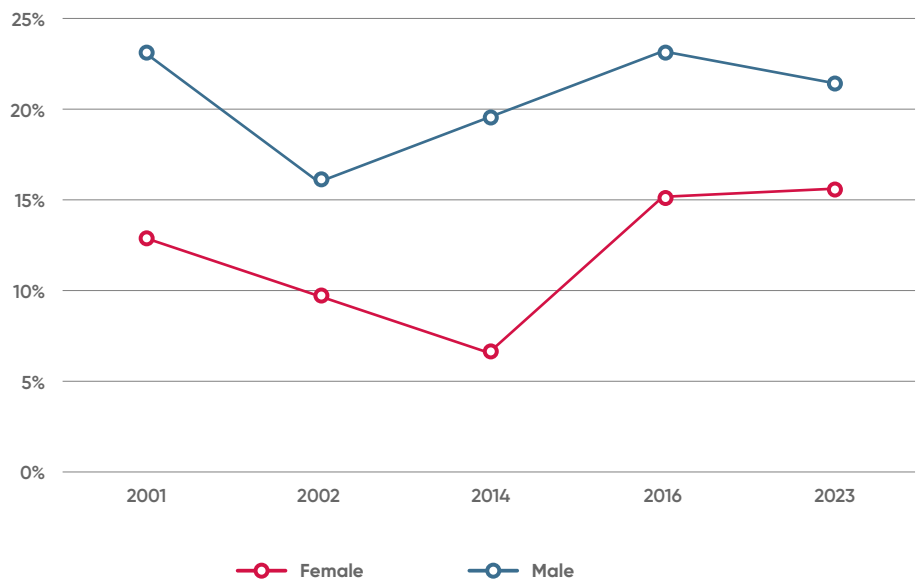
⁹ Merkle, Dr. Ortun, *Gender and Corruption: What Do We Know? A Discussion Paper*, Organisation for Security and Cooperation in Europe, 2021.

¹⁰ UNODC, *Gendered Impacts of Corruption. University Module Series: Anti-Corruption Module 8: Corruption and Gender*, United Nations Office on Drugs and Crime, Vienna: n.d.

¹¹ UNODC, *Gendered Impacts of Corruption. University Module Series: Anti-Corruption Module 8: Corruption and Gender*, United Nations Office on Drugs and Crime, Vienna: n.d.

are less likely to engage in corrupt behaviour because their social roles, particularly as mothers and primary caregivers, predispose them toward more altruistic and ethical conduct.¹² Bulgarian survey data seem to support such findings as male survey participants appear to be consistently more susceptible to corruption offers than female ones (Figure 1).¹³

Figure 1. A gender perspective on corruption susceptibility. Males report being more likely to accept a bribe than females



Source: Center for the Study of Democracy, Corruption Monitoring System, 2024.

This perspective is primarily applicable when women occupy more traditional social roles, which is highly likely to change over time. This perspective extends into leadership theory, where women are seen as more relational and transformational, making them more likely to promote transparency and accountability. These findings suggest that policies aimed at empowering women in leadership positions could contribute to reducing corruption.¹⁴ Thus, a key recommendation for policymakers is to promote gender equality in leadership roles, not only as a matter of fairness but also as an anti-corruption strategy, infusing more competition and challenging established old-boys' club and monopolistic networks.

However, more recent research challenges the notion that women are inherently less corrupt than men.¹⁵ Instead, it emphasises that women's relative lack of empowerment, especially in male-dominated networks, limits

¹² UNODC, *Gendered Impacts of Corruption. University Module Series: Anti-Corruption Module 8: Corruption and Gender*, United Nations Office on Drugs and Crime, Vienna: n.d.

¹³ Based on CSD Corruption Monitoring System calculation.

¹⁴ WDO, *The Integral Role of Women in Fighting Corruption*, Women Development Organisation, 2024.

¹⁵ Johnson JE, Einarisdóttir Þ, Pétursdóttir GM. *A Feminist Theory of Corruption: Lessons from Iceland. Politics & Gender*, Cambridge University Press, 2013.

their opportunities to engage in corrupt activities. Some researchers argue that as women gain more access to power, their behaviour may begin to mirror that of their male counterparts, suggesting that corruption is more a product of power and opportunity than inherent gender differences.¹⁶ This shift in the theoretical landscape has important policy implications: besides focusing on gender-specific attributes, anti-corruption efforts should target the systemic factors that enable corruption. This includes promoting transparency, accountability, and governance reforms that benefit all, regardless of gender.

In the Bulgarian context, while much of the discussion around anti-corruption focuses on policy reforms, there is also a pressing need to address the lack of effective justice measures, particularly convictions in combating high-level corruption. It is noteworthy that one of the few known convictions resulting in imprisonment in Bulgaria involved two women. This raises questions about the broader effectiveness of anti-corruption efforts and the justice system's role in holding individuals accountable. At the same time, it also illustrates how women, when implicated in corruption, may more easily become symbols of blame and shame. This example underscores the complexity of gender dynamics within the context of corruption, highlighting not only the need for policy and justice reforms, but also the importance of ensuring that accountability is applied fairly to all, regardless of their gender.

At the backdrop of such cases, it cannot be denied that there are broader gender inequalities in access to power and resources which contextualise opportunities for corruption among women in Bulgaria. To address this, policymakers should ensure that anti-corruption frameworks are not only gender-responsive, but also inclusive of measures that disrupt entrenched power structures. Strengthening institutional checks and balances, promoting civic participation, and enhancing transparency are key strategies in this regard.

By ensuring that women are present in leadership roles, gender quotas are often used as a tool for diversifying perspectives and improve the governance of public institutions. However, it is important to note that gender quotas are not synonymous with a simple 50/50 male-female representation. The design and implementation of quotas usually is tailored to the specific context, and informed by preliminary research to meet the needs of a given society or sector. However, the causal relationship between gender quotas and corruption reduction remains debated.

On the other hand, a feminist approach to corruption adds another critical lens to the discussion.¹⁷ Feminism argues that vulnerable groups, particularly women and marginalised gender communities, are the most adversely affected by corruption. This approach emphasises that corruption is not merely a legal or economic problem, but one deeply embedded in power dynamics and structural inequalities. Corruption often exploits the vulnerabilities of marginalised groups, particularly in areas like healthcare, education, and law enforcement, where women are disproportionately impacted. Feminist scholars call for anti-corruption strategies that not only address the immediate legal and economic consequences of corruption, but also tackle the

¹⁶ UNODC, *Gendered Impacts of Corruption. University Module Series: Anti-Corruption Module 8: Corruption and Gender*, United Nations Office on Drugs and Crime, Vienna: n.d.

¹⁷ IACC Series, *Why Feminism Matters in the Fight Against Corruption*, July 2023.

patriarchal systems that sustain it. This requires a focus on social justice and the dismantling of power structures that perpetuate inequality. In practice, this means advocating for reforms that prioritise the needs of the most vulnerable and marginalised, regardless of their gender ensuring that anti-corruption efforts are inclusive and equitable.

A feminist approach to corruption, therefore, goes beyond merely describing the differential impacts of corruption on men and women. It seeks to transform the power relations that allow corruption to thrive in the first place. Policymakers adopting a feminist perspective should focus on creating systems that not only prevent corruption, but also promote social justice. Which for the GBV-corruption efforts means policymakers should work to empower grassroots communities by fostering inclusive participation in decision-making processes, supporting local anti-corruption initiatives, and ensuring equitable access to justice and resources for marginalised groups.

Both gender and feminist perspectives offer valuable insights into the understanding and practical reality of corruption. The gender perspective provides a broader, more neutral lens through which to examine how different genders experience corruption, while the feminist approach offers a critical framework for understanding how power, inequality, and structural systems disproportionately disadvantage women and marginalised gender groups. For policymakers, the challenge is to integrate these insights into anti-corruption strategies that are inclusive, gender-responsive, and transformative. By doing so, they can ensure that anti-corruption efforts not only reduce corruption, but also promote social equity and justice.

GENDER-BASED VIOLENCE AGAINST WOMEN IN THE CONTEXT OF BROADER SYSTEMIC CHALLENGES

The interplay between corruption and institutional mistrust is essential for understanding the barriers that victims of GBV face when seeking (or not seeking) help. Corruption may not always directly target women, victims of GBV, but institutional mistrust does because it leads to a lack of confidence in public institutions, making victims hesitant to report incidents. To effectively combat GBV, it is essential to incorporate measures aimed at rebuilding institutional trust alongside traditional prevention and intervention strategies. Strengthening oversight mechanisms, ensuring transparency, and fostering community engagement can help bridge the gap between victims and the institutions meant to protect them.

In Bulgaria, GBV remains a serious issue. About 20.5% of Bulgarian women have experienced psychological, physical or sexual violence by an intimate partner in their adult life.¹⁸ Gender stereotypes and discrimination persist, and traditional gender roles continue to shape societal expectations. These roles surface not only in discussions around GBV, but also in legal initiatives, political discourse, and public debate, affecting areas such as access to education, access to information and LGBTI+ rights.¹⁹ Many Bulgarians fail to recognise certain acts, such as slapping, stalking or psychological abuse, as forms of domestic violence.²⁰ Violent language and gendered disinformation are frequently used for populist purposes, even in the Bulgarian parliament.²¹ Work-related GBV²² or GBV in the universities²³ have only recently started receiving the attention they deserve.

The amendments to the *Domestic Violence Protection Act* that came into effect in 2023 and 2024 cannot be deemed sufficient either, as they primarily focus on one specific form of GBV – domestic violence. There is an urgent need for targeted policy and legal reforms that encompass other forms of GBV, such as workplace harassment, cyber violence, and issues particularly relevant to Bulgaria, like forced marriages. These forms of GBV, along with others, are addressed in the recently adopted *Directive (EU) 2024/1385 on combatting violence against women and domestic violence*. Unfortunately, this Directive, still in transposition period, is seldom referenced beyond the general discourse among stakeholders in domestic violence protection in

¹⁸ National Statistical Institute, *Survey on Gender-Based Violence EU-GBV, 2021, 2021*.

¹⁹ Boycheva I, *The Legal Metamorphosis of Domestic Violence in Bulgaria. 2023: Legal Amendments and Trends*, Sofia: Center for the Study of Democracy, 2024.

²⁰ Trend Research Center, *Домашното насилие в българското общество – изследване и доклад*, 2024.

²¹ Center for the Study of Democracy, *Gendered Disinformation Targeting Ukrainian Women Refugees in Bulgaria*, Policy Brief No. 148, August 2024.

²² NSI, *Survey on Gender-Based Violence EU-GBV, 2021, 2021*.

²³ Cantalupo, N.C., 'Institution-Specific Victimization Surveys: Addressing Legal And Practical Disincentives To Gender-Based Violence Reporting on College Campuses', *Trauma, Violence, & Abuse*, 15(3), pp.227-241, 2014.

Bulgaria. The Directive underscores the necessity of robust data collection and comprehensive research to inform coordinated policies, as highlighted in Article 44. In this case, effective research and data collection is vital for understanding the scope and prevalence of all forms of GBV, enabling policymakers to develop targeted interventions that address the specific needs of victims. Moreover, comprehensive data on GBV can showcase better the experience of the victims with institutions and the obstacles they are facing. By prioritising research and data-driven approaches, Bulgaria can establish a more informed, comprehensive strategy to combat GBV in all its forms and enhance the overall understanding of the interplay between GBV and corruption.

Bulgaria currently lacks national statistics and a reliable centralised register on gender-based or domestic violence. This leaves a significant gap in both policy-making and prevention efforts,²⁴ and limits the ability to monitor and evaluate such initiatives effectively.²⁵ The post-Istanbul Convention narrative²⁶ has long been an obstacle to adopting holistic legal measures, but recent legal amendments, motivated by both civil society and the Council of Europe, offer some hope.²⁷ However, not all of these measures are fully applicable, and some will take time to implement. The broader challenge of addressing GBV in Bulgaria lies in a lack of effective prevention efforts, beginning with education for young children.

The amendments to the *Domestic Violence Protection Act*²⁸ that came into force in August 2024 envisaged the introduction of a National Information System for prevention of and protection against domestic violence. The system is intended to store data on domestic violence cases occurring within the country or involving Bulgarian nationals abroad who have sought help and support. Although the government announced in March 2024 that the system would be operational by August 2024, it remains non-functional and, according to official sources, is unlikely to be operational before mid-2025.²⁹

²⁴ Tzvetkova, G., Kuneva, L., and Yakova, L., *From Victim Blaming to Victim Sensitivity: A State of the Art Analysis of Domestic and Gender-Based Violence in Bulgaria*, Sofia: Center for the Study of Democracy, 2022.

²⁵ Tzvetkova, G., Kuneva, L., and Yakova, L., *Domestic and Gender-Based Violence in Bulgaria: Methodology for Monitoring Policy and Institutional Practice*, Sofia: Center for the Study of Democracy, 2021.

²⁶ Ilcheva, M., "Bulgaria and the Istanbul Convention – Law, Politics and Propaganda vs. the Rights of Victims of Gender-based Violence", *Open Journal for Legal Studies*, 2020, 3(1), 49-68, 30 May 2020.

²⁷ Secretariat of the Council of Ministers, *Communication from Bulgaria concerning the group of cases Y and Others v. Bulgaria (Application No. 9077/18) and the case of A.E. v. Bulgaria (Application No. 53891/20)*, 20 August 2024.

²⁸ Bulgaria, *Law on Amending and Supplementing the Domestic Violence Protection Act [Закон за изменение и допълнение на Закона за защита от домашното насилие]*, 11 August 2023.

²⁹ Trud, "Construction of the National Information System for Prevention and Protection from Domestic Violence has started" [„Започна изграждането на Националната информационна система за превенция и защита от домашното насилие“], 12 March 2024.

GENDER-BASED VIOLENCE AND ADMINISTRATIVE CORRUPTION: THE BULGARIAN CASE

Both GBV and administrative corruption are underreported in Bulgaria. While administrative corruption is a naturally hidden phenomenon where both parties involved are often consensually engaged in an unlawful act, GBV underreporting is rather due fear of retaliation, lack of trust in authorities, limited access to supportive resources, and the social stigma shifting the focus of the public away from this phenomenon.

Looking at both corruption and GBV at the local level is highly important for local-level mobilisation, which is fundamental to comprehensive victim-centred prevention of GBV (and domestic violence in particular).³⁰ To explore how corruption further exacerbates the situation with GBV at the local level and to enable targeted local-level policy interventions, especially in vulnerable regions, the current report pilots two vulnerability indexes: the **Vulnerability to Administrative Corruption Index** and the **Vulnerability to Gender-Based Violence Index**.

Gender-Based Violence

Box 1: Definitions of Gender-based Violence

According to *Directive (EU) 2024/1385 on combatting violence against women and domestic violence*, violence against women means all acts of gender-based violence directed against a woman or a girl because she is a woman or a girl or that affect women or girls disproportionately, that result in or are likely to result in physical, sexual, psychological or economic harm or suffering, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life. Domestic violence, on the other hand, is defined as all acts of violence that occur within the family or domestic unit, irrespective of biological ties, or between former or current spouses or partners, whether or not the offender shares or has shared a residence with the victim.

According to the Council of Europe, gender-based violence can be sexual, physical, verbal, psychological (emotional), or socio-economic and it can take many forms, from verbal violence and hate speech on the Internet, to rape or murder. It can be perpetrated by anyone: a current or former spouse/partner, a family member, a colleague from work, schoolmates, friends, an unknown person, or people who act on behalf of cultural, religious, state, or intra-state institutions. Gender-based violence, as with any type of violence, is an issue involving relations of power. It is based on a feeling of superiority, and an intention to assert that superiority in the family, at school, at work, in the community or in society as a whole.³¹

³⁰ Tzvetkova, Kuneva, and Yakova, *From Victim Blaming to Victim Sensitivity*, Sofia: CSD, 2022.

³¹ Council of Europe, *What is gender-based violence?*, n.d.

Although the available data on gender-based and domestic violence are limited, they clearly indicate that both reporting and institutional filters significantly affect the recorded prevalence of these incidents in Bulgaria. For instance, the *Study on Domestic and Gender-Based Violence* conducted in 2015 found that 7.6% of surveyed women had experienced domestic violence. This share translates to an estimated 195,000 to 285,000 women affected by domestic violence in that year alone. In contrast, the Bulgarian 112 emergency line typically receives only around 30,000 reports annually, highlighting a substantial gap between actual incidents and those officially reported.³² Even if there were other channels of reporting (e.g., hotlines, direct reporting to the police, etc.), the vast number of cases seem to remain unreported. Although victims are encouraged to report, the police appear to register only about 2,000 cases of domestic violence annually.³³ The lack of easily accessible police statistics on the different forms of GBV and domestic violence combined with the lack of data from independent sources like victimisation surveys makes it impossible to estimate the magnitude of the problem. Nevertheless, GBV seems to be both severely under-reported and under-registered in Bulgaria. The absence of a reliable data collection mechanism has been repeatedly emphasised by international monitoring bodies and independent researchers,^{34,35} even before the Istanbul Convention debates, which specifically calls for official statistics. However, as of 2024 the situation remains largely the same as it was a decade ago.

Box 2: Methodological approach to analysing gender-based violence

GBV can be analysed quantitatively through victimisation surveys, where representative samples of the population are asked specific questions to identify victims and assess both prevalence and incidence rates over a defined period (typically the past 12 months or the past five years). Police statistics, court records, and national hotline data provide complementary information that can also be analysed. However, data from all these sources is severely limited in Bulgaria. Police statistics do not capture all forms of GBV or to consolidate them under a unified category. The categories used by the police and services like the 112 emergency line differ, making it challenging to compare the data or track annual incidence rates. Data from victimisation surveys are even scarcer, with some of the few notable examples being the Center for the Study of Democracy's *National Study on Domestic and Gender-Based Violence (2016)*³⁶ and *State of the Art Analysis of Domestic and Gender-Based Violence in Bulgaria (2022)*³⁷ and the National Statistical Institute's *Survey on Gender-Based Violence EU-GBV (2021)*.³⁸

³² Bulgarian National Television, 'Over 23,000 reports of domestic violence have been filed' [„Над 23 000 са подадените сигнали за домашно насилие“], 25 November 2019.

³³ Bulgarian National Television, 'Behind the walls of the home: The Ministry of Interior calls on domestic violence victims to report' [„Зад стените на дома: МВР призовава жертвите на домашно насилие да подават сигнали“], 9 September 2024.

³⁴ Ivanova, S., *National Study on Domestic and Gender-Based Violence in Bulgaria*, Sofia: Center for the Study of Democracy, 2016.

³⁵ Commissioner for Human Rights of the Council of Europe, *Dunja Mijatović: Report Following Her Visit to Bulgaria from 25 to 29 November 2019*, Council of Europe, 2019, pp 16.

³⁶ Ivanova, S., *National Study on Domestic and Gender-Based Violence in Bulgaria*, Sofia: Center for the Study of Democracy, 2016.

³⁷ Tzvetkova, Kuneva, and Yakova, *From Victim Blaming to Victim Sensitivity*, Sofia: CSD, 2022.

³⁸ National Statistical Institute, *Survey on Gender-Based Violence EU-GBV, 2021: Methodological notes*, 2022.

These surveys, however, have methodological limitations, especially in relation to data at local level. The National Study on Domestic and Gender-Based Violence covers only 1,300 women, a sample size that is insufficient for regional comparisons. The State of the Art Analysis of Domestic and Gender-Based Violence in Bulgaria does not cover all districts and municipalities in Bulgaria, certain aspects of its implementation include insufficiently diverse categories of stakeholders, and the study as a whole is qualitative in nature, which means that no big samples of respondents are covered. The Survey on Gender-Based Violence EU-GBV has a somewhat larger sample of 5,500 women, yet this is still insufficient for detailed regional analysis. Moreover, as a one-time study rather than a recurring assessment, it lacks the capacity to track trends over time.

The lack of sufficient data hampers traditional criminological analysis, which seeks to assess and monitor critical issues such as latent crime and police reporting filters, and to provide policy recommendations based on quantitative findings.³⁹ 'Latent crime' refers to criminal acts that go unreported and therefore unrecorded in official statistics. Research indicates that reporting rates vary significantly across different types of crime, with sexual assaults being a common example of underreporting.⁴⁰ Additionally, even reported crimes are not always officially recorded due to 'institutional (police) filters' – a practice where authorities discourage victims from filing formal reports, or fail to register these reports for various reasons.⁴¹

Regional Dimensions of Sexual Violence

Addressing the regional disparities in sexual violence from a policy point of view is difficult due to the multiple factors that could influence prevalence rates, many of which are not region-specific, such as cultural norms⁴² and the legal framework.⁴³ Additional factors are linked to the general development of a region, including socioeconomic conditions like poverty, unemployment, economic inequality, access to education, prevalence of alcohol and substance abuse, and others.^{44,45,46}

³⁹ Rusev, A., Gerganov, A., and Bezlov, T., *Crime Trends in Bulgaria: 2010-2020*, Sofia: Center for the Study of Democracy, 2021.

⁴⁰ Rusev, A., Gerganov, A., and Bezlov, T., *Crime Trends in Bulgaria: 2010-2020*, Sofia: Center for the Study of Democracy, 2021.

⁴¹ Bezlov, Gounev, and Gerganov, *Crime Trends in Bulgaria: 2000-2010*, Sofia: CSD, 2011.

⁴² World Health Organization, *Preventing intimate partner and sexual violence against women: Taking action and generating evidence*, 2010.

⁴³ UNODC, *Global study on homicide: Gender-related killing of women and girls*, United Nations Office on Drugs and Crime, 2019.

⁴⁴ Jewkes, R., 'Intimate partner violence: Causes and prevention', *The Lancet*, 359(9315), 1423-1429, 2002.

⁴⁵ DeGue, S., et al., 'A systematic review of primary prevention strategies for sexual violence perpetration', *Aggression and Violent Behavior*, 19(4), 346-362, 2014.

⁴⁶ Abbey, A., et al., 'Alcohol and sexual assault', *Alcohol Research & Health*, 25(1), 43-51, 2001.

Figure 2. Regional Sexual Violence Index



Source: Center for the Study of Democracy, 2024.

Tackling these issues requires long-term planning and nation-wide measures alongside targeted support for underdeveloped regions. Nevertheless, immediate interventions and policy actions in high-vulnerability regions are possible by providing shelters, counselling, and legal support for victims of sexual violence, particularly for those with multiple vulnerabilities (e.g., young mothers from ethnic minority groups with low level of education, migrants and refugees, etc.). Studies show that such efforts can improve reporting of sexual offences, enhance prevention, and ultimately reduce rates over time.⁴⁷ Finally, educating communities of women at risk and supporting local grassroots movements can foster protection and reduce the risk of sexual violence in the short term.

Regional Dimensions of Physical Violence

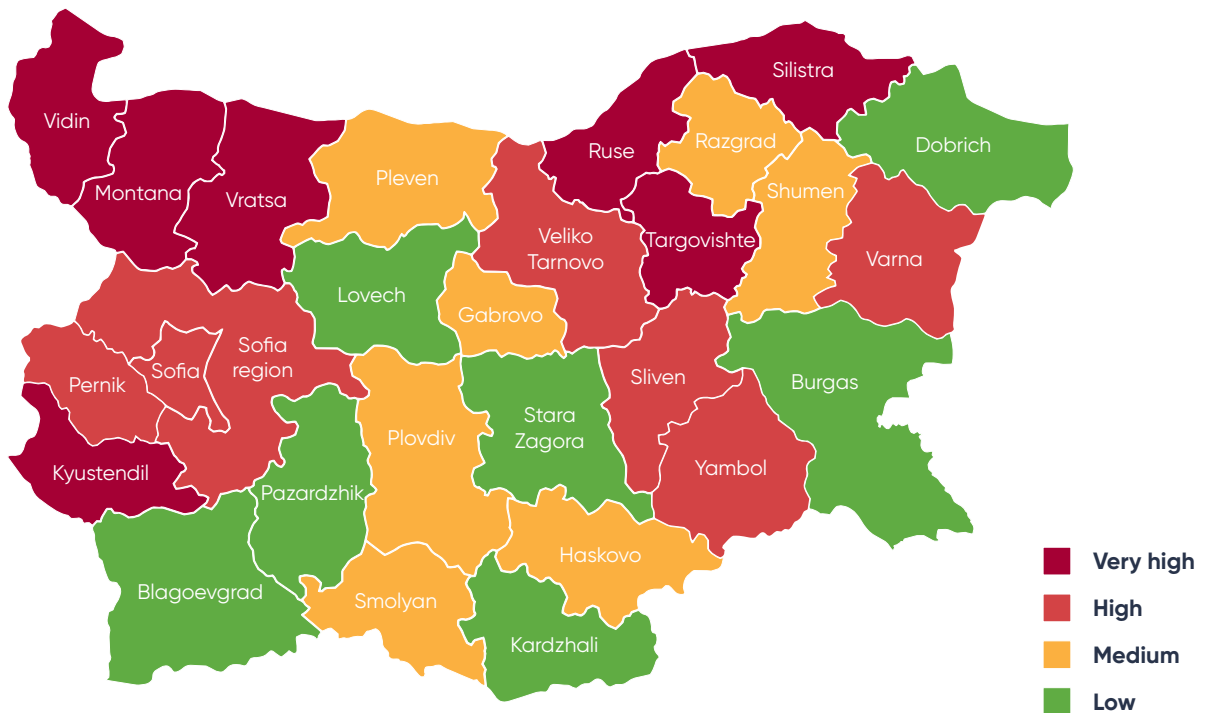
The National Statistical Institute's Survey on Gender-Based Violence EU-GBV defines physical violence as "intentional behaviour aimed at causing suffering and inducing fear through the use of direct physical force resulting in bodily pain and/or injury".⁴⁸ According to this study, 8.5% of women have experienced physical violence, including threats of such violence, during their adult life.

The regional distribution of physical violence vulnerability reveals considerable disparities across different regions (Figure 3).

⁴⁷ Campbell, R., 'The psychological impact of rape victims' experiences with the legal, medical, and mental health systems', *American Psychologist*, 63(8), 702-717, 2008.

⁴⁸ NSI, Survey on Gender-Based Violence EU-GBV, 2021, 2021.

Figure 3. Regional Physical Violence index



Source: Center for the Study of Democracy, 2024.

Several regions in Bulgaria's northwest – Vidin, Montana, and Vratsa – emerge as particularly problematic in terms of high prevalence of physical violence, along with Kyustendil, Ruse, Silistra, and Targovishte. When comparing physical violence (Figure 3) and sexual violence (Figure 2) indexes, Vidin and Ruse stand out as regions with very high levels of both. These two regions require special attention to investigate the root causes and drivers of high physical and sexual violence rates. Close monitoring is also needed of both institutional data, such as the number of reports received and cases processed, and self-reported victimisation rates and their trends over time. The latter could be achieved through targeted GBV victimisation surveys with sufficiently large samples to produce reliable rate estimates in high-vulnerability areas. In a national GBV survey context, this could be achieved by using booster samples in regions identified as priority areas.

Another notable pattern emerges in regions showing high levels of vulnerability on one of the indexes but low on the other. For example, Blagoevgrad exhibits very high levels of sexual violence and low levels of physical violence, while Silistra shows the opposite pattern, with very high levels of physical violence and low levels of sexual violence. While some of this variance can be attributed to technical and methodological constraints in survey data (e.g., small sample sizes, sampling errors, sources of non-random error in sampling, limitations in the victims' comprehension of questions or reluctance to disclose answers), at least part of these differences can be due to the different factors in play when sexual and physical violence are considered. Thus, alcohol and drug abuse, while significant predictors of both sexual and physical violence, affect them differently. For example, substance abuse may drive repeated incidents of physical violence within intimate relationships,⁴⁹ while contributing to sexual violence more often outside such relationships.

⁴⁹ Fals-Stewart, W., & Leonard, K. E., 'Behavioral couples therapy for alcoholism and drug abuse', *Journal of Substance Abuse Treatment*, 28(4), 417-428, 2005.

Another factor linking violence to family dynamics is exposure to violence in childhood. Regions with higher prevalence of children exposed to violence may experience cycles of violence, as individuals replicate family dynamics and behavioural patterns they observed growing up.^{50,51} Authorities and national CSOs addressing these issues should consider more carefully regional nuances in the prevalence of sexual and physical GBV, as well as potential regional gaps in institutional capacity. Both analytical and policy efforts are crucial in regions with higher vulnerability. Furthermore, fostering and supporting grassroots movements in vulnerable communities, such as economically disadvantaged or ethnically diverse villages and Roma neighbourhoods, and building their capacity through targeted training, information campaigns, and strategic funding, could significantly alleviate the immediate suffering of GBV victims.

Regional Dimensions of Administrative Corruption

Unlike GBV, the prevalence of administrative corruption is measured regularly through victimisation surveys.⁵² These surveys assess the prevalence and dynamics of corruption by tracking corruption pressure, personal experiences with corruption, and public attitudes towards it, thereby providing data to support evidence-based anti-corruption policies, particularly in Southeastern Europe.⁵³ In addition, the regular Eurobarometer surveys on administrative corruption, which use a methodology inspired by the CSM, measure this phenomenon across the EU-27.

Box 3: Measuring corruption vulnerability at regional level

CMS defines two highly linked experience-based indicators: corruption pressure (survey participants reporting being asked for a bribe: money, gift or favour, by a public official; either directly or indirectly through hints) and corruption activities (actually giving a bribe in the form of money, gift or a favour). These two indicators are used to compute a regional corruption vulnerability index – a unique attempt to assess administrative corruption at the NUTS3 regional level – a level of analysis that is usually neglected due to the small sampling size of corruption assessment surveys. While there are certainly data limitations for regional corruption analysis, this innovative index provides a unique opportunity to zoom in to a regional level and collect additional data where needed to fuel a more informed policy response to administrative corruption at the regional level. Multiple well-developed instruments exist for this purpose, for example the aforementioned CMS and the Monitoring Anti-Corruption Policy Implementation (MACPI) toolbox.⁵⁴

The regional corruption vulnerability index draws from several data sources: CSD's Corruption Monitoring System Survey conducted in 2016 and 2023 and the Eurobarometer 92.4 (2019) on attitudes of European

⁵⁰ Widom, C. S., 'The cycle of violence', *Science*, 244(4901), 160-166, 1989.

⁵¹ Ivanova, S., *National study on domestic and gender-based violence in Bulgaria*, Sofia: Center for the Study of Democracy, 2016.

⁵² Based on CSD Corruption Monitoring System calculation.

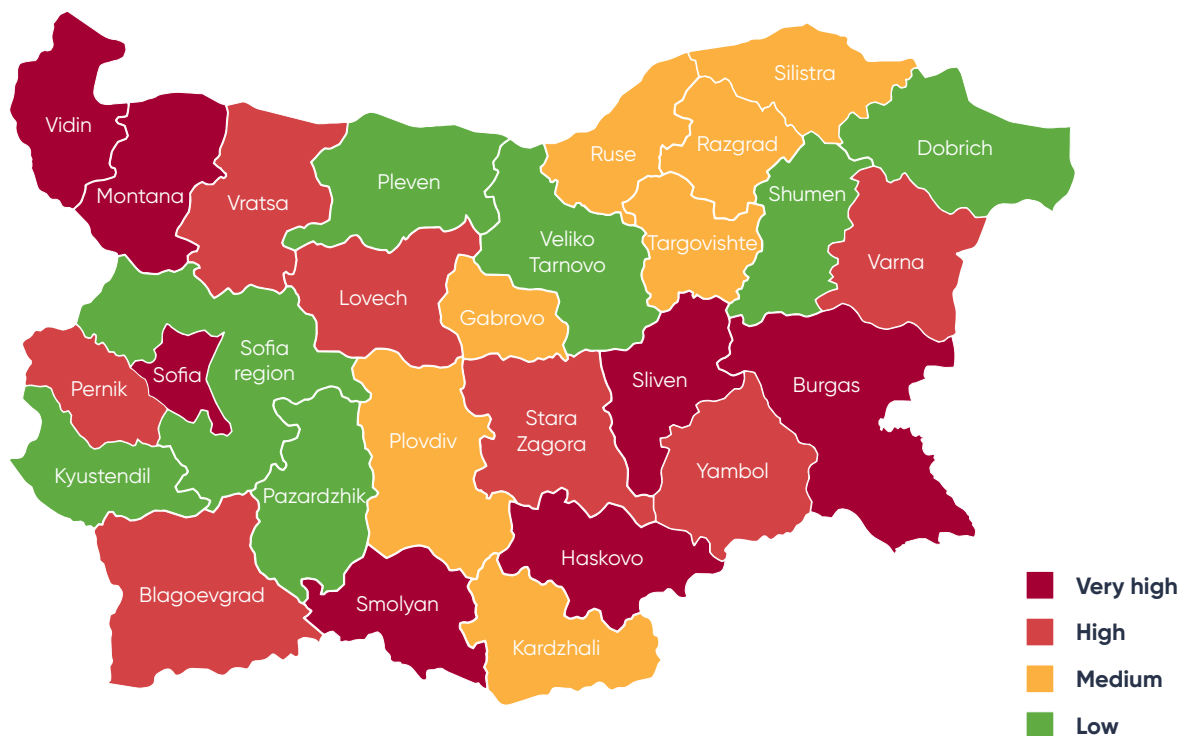
⁵³ Based on CSD Corruption Monitoring System calculation.

⁵⁴ Gerganov, A. et al., *Monitoring Anti-Corruption in Europe: Bridging Policy Evaluation and Corruption Measurement*, Sofia: Center for the Study of Democracy, 2015.

citizens towards the environment, corruption, and attitudes towards the impact of digitalisation on daily lives.⁵⁵ As these sources cover different years, the index should be regarded as **general vulnerability of different NUTS3** regions that is not time-sensitive. More detailed data would be needed for building a time-sensitive trend at the regional level.

The proliferation of administrative corruption has increased significantly in recent years in Bulgaria.⁵⁶ However, police or judiciary data fail to reflect findings from citizens' reported experiences.⁵⁷ Detailed information at regional level is lacking due to methodological limitations in implementing a victimisation approach at NUTS3 or even NUTS2 levels as reliable assessment of corruption pressure or involvement prevalence and incidence rates would require a much larger sample size. At the same time, police and judiciary statistics do not always accurately reveal the reality on the ground, as administrative corruption is inherently a deeply hidden phenomenon that requires indirect approaches to assess its prevalence and changes over time.

Figure 4. Regional Corruption Vulnerability Index



Source: Center for the Study of Democracy, 2024.

⁵⁵ European Commission, *Eurobarometer 92.4*, Cologne: GESIS, ZA7602 Data file Version 2.0.0, 2019.

⁵⁶ Center for the Study of Democracy, *The State of Capture: The Elusive Quest for Anti-Corruption Results*, Policy Brief No. 144, April 2024.

⁵⁷ Center for the Study of Democracy, *The State of Capture: The Elusive Quest for Anti-Corruption Results*, Policy Brief No. 144, April 2024, p. 5.

The Regional Corruption Vulnerability Index highlights considerable regional disparities in corruption vulnerability across Bulgaria. The regions with very high vulnerability are concentrated primarily in the Southern and North-eastern parts of the country, including areas like Burgas, Sliven, Haskovo, Smolyan, Montana, Vidin, and the capital city Sofia. High-vulnerability regions extend through parts of the Northwest and South-central areas (Vratsa, Lovech, Varna, Yambol, Stara Zagora, Pernik and Blagoevgrad). Medium vulnerability is observed in central regions such as Gabrovo and Plovdiv, in the Northeast (Silistra, Ruse, Targovishte, and Razgrad), as well as in Kardzhali. Low vulnerability is primarily seen in the North-eastern (Dobrich and Shumen) and Southwestern (Kyustendil and Pazardzhik) areas, as well as in Pleven, Veliko Tarnovo and the region surrounding the capital city Sofia (Figure 4).

Regions Vulnerable to Gender-Based Violence and Corruption

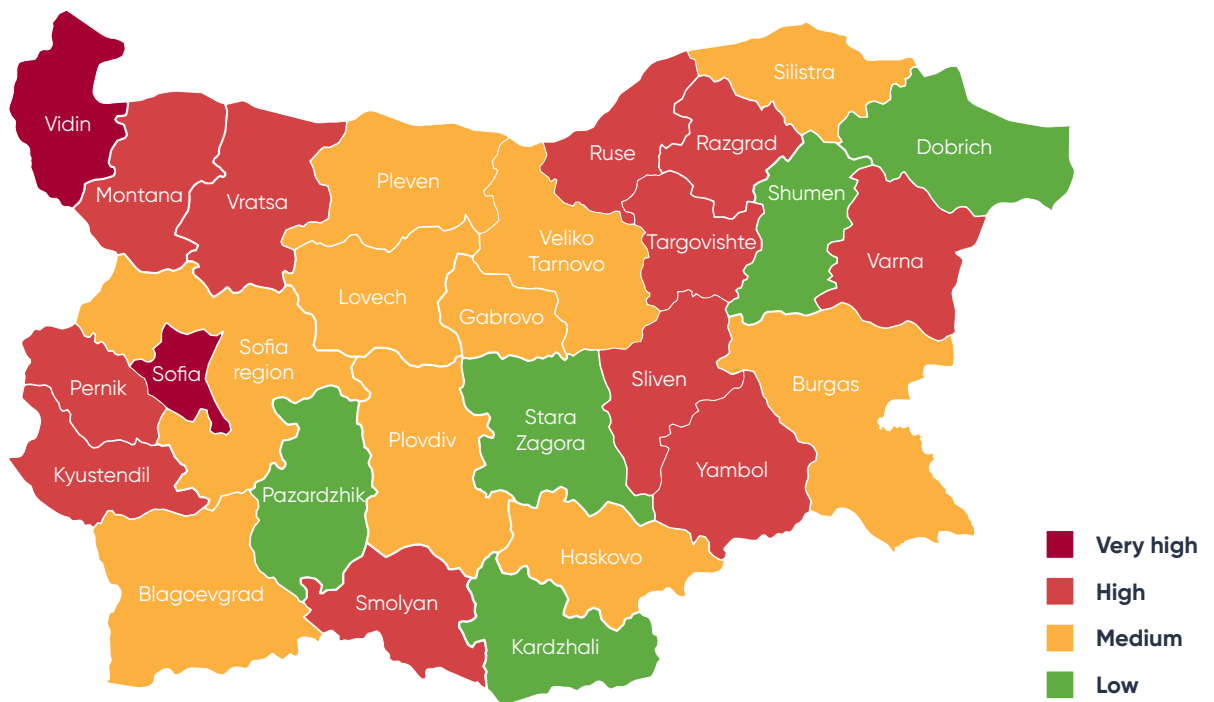
Administrative corruption indirectly contributes to higher levels of latent (unreported) crime and directly affects police filters, leading to under-registration of reported cases. This impact is particularly concerning in cases of GBV, where victims may be discouraged from reporting incidents due to perceived or actual corruption among law enforcement officials. For example, according to the National Statistical Institute's *Survey on Gender-Based Violence EU-GBV (2021)*, 2.9% of women aged 18-74 experienced at least one incident of GBV in the 12 months preceding the survey.⁵⁸ The lack of comparable police data on GBV reports makes it difficult to assess the magnitude of underreporting. Nonetheless, when compared to the survey data, even the limited available official data suggest not only a significant number of unreported cases but also instances where reported cases are not properly registered by the police.

The Vulnerability to Gender-Based Violence Index reveals very high vulnerability in Vidin and Sofia with eleven other regions identified as high vulnerability areas (Figure 5).⁵⁹ This calls for targeted interventions in these regions, including training and support for frontline workers in law enforcement, healthcare, social services, and legal aid. Efforts should also focus on strengthening transparency and accountability within institutions in high vulnerability regions. Empowerment efforts for GBV victims should extend beyond institutional support to engage the communities in places like Sofia and Vidin through initiatives such as Community Watch Programmes that can foster safer environments for women and girls.

⁵⁸ Considering the sampling error, this translates to an estimated 65,000 to 88,000 potential GBV victims – a conservative estimate compared to the 2016 study on domestic and gender-based violence conducted by CSD, which reported somewhat higher annual prevalence rates depending on the survey method used (direct questioning vs detailed descriptions of various types of GBV incidents).

⁵⁹ Domestic violence signals registered by the Bulgarian 112 emergency line show regional variations as well. When adjusted for population size, the 2021 data show a range of 2.2 to 7.6 reports per 1,000 inhabitants across different NUTS3 regions.

Figure 5. Vulnerability to Gender-Based Violence Index



Source: Center for the Study of Democracy, 2024.

Confidential reporting mechanisms for gender-based and domestic violence are essential to ensure that victims and witnesses feel safe and secure when reporting incidents, free from the fear of retaliation or further victimisation. Building trust within local communities is vital for encouraging individuals to come forward and seek help. Additionally, there is a pressing need for increased supervision and accountability among police officers working with victims of GBV and corruption. Implementing regular oversight mechanisms can ensure that officers perform their duties diligently and ethically. It can also address instances of negligence due to apathy or lack of motivation, and reduce instances where corrupt practices compromise the integrity of investigations.

Strengthening the capacity of public institutions to curb administrative corruption, especially in vulnerable regions (Sofia, Vidin, Montana, Smolyan, and Sliven in particular) is critical for ensuring that anti-corruption efforts are focused and effective. To achieve this, regular assessment is necessary, including by collecting detailed victimisation data in vulnerable regions and integrating existing datasets (such as 112 emergency signals and police statistics) to assess the proliferation of administrative corruption and GBV. Such data is also essential for monitoring how effectively public institutions respond to reports, including how many of the signals are processed and lead to concrete actions.

Furthermore, monitoring the implementation and effectiveness of anti-corruption policies in vulnerable regions should be done regularly (at least annually) in a transparent manner, utilising the latest state-of-the-art instruments.⁶⁰

Better institutional interoperability and collaboration with civil society organisations (CSOs) are also essential for enhancing the capacity of public institutions, particularly in regions identified as highly vulnerable.

⁶⁰ Gerganov, A. et al., *Monitoring Anti-Corruption in Europe: Bridging Policy Evaluation and Corruption Measurement*, Sofia: Center for the Study of Democracy, 2015.

RECOMMENDATIONS

- **Promote general awareness of gender equality and women in leadership.** GBV is both a cause and a consequence of gender inequality. Addressing GBV must be seen as part of the broader effort to combat gender inequality and vice versa. Policies should prioritise prevention through comprehensive awareness-raising and educational initiatives, starting in schools. Dedicated funding should be allocated within national and EU budgets for prevention, training, and awareness programmes focused specifically on promoting gender equality and supporting women's leadership across all sectors. These initiatives should emphasise gender equality as a standalone issue, rather than framing it solely within the context of domestic violence. By doing so, gender equality efforts will focus not only on victimhood but on empowerment, leadership and women's roles as agents of change, which is essential for achieving true gender parity and reducing violence.
- **Collect comprehensive and reliable statistics on GBV.** As required by Article 11 of the *Istanbul Convention* and Article 44 of the *Directive on Combating Violence against Women and Domestic Violence*, data collection and research on GBV are critical for evidence-based policy-making. Currently, Bulgaria lacks sufficient data to implement effective strategies. Establishing and maintaining the National Information System on prevention of and protection against domestic violence is a necessary first step, but it should be supplemented with additional data collection, including disaggregated statistics, research studies, and population-based surveys. This data should be publicly accessible to foster transparency and accountability. Data collection should also include information on institutional failures, particularly where corruption obstructs justice or erodes victims' trust, leading them to withdraw from the system.
- **Advocate for policy and legal reforms through multi-stakeholder synergies.** CSOs addressing GBV should collaborate with those focused on anti-corruption and rule of law, as corruption often blocks access to justice for GBV victims – not just through bribery, but through inaction or neglect by authorities (e.g., the police failing to investigate cases or dismissing complaints). A feminist coalition approach can centre the experiences of women and marginalised communities, who are disproportionately affected by corruption. By forming coalitions, CSOs can advocate for policy reforms that present GBV as a governance issue, not merely a 'women's issue'. Joint efforts can highlight how corruption in law enforcement and the justice system harms vulnerable groups and push for transparency, accountability, and equal access to justice for all.
- **Provide training and support for frontline workers.** Frontline workers in law enforcement, healthcare, social services, and legal aid, who engage with GBV victims require comprehensive training on addressing corruption-related challenges. This training should include recognising, avoiding, and reporting corruption, such as bribery or conflicts of interest, that could interfere with their work. Training should cover reporting mechanisms, ensuring that frontline workers can guide victims through

these mechanisms without engaging in corrupt practices. Training should also instil resilience making sure that frontline workers can navigate institutional barriers and provide consistent support to victims. This should be reinforced by continuous professional development and accountability measures.

- **Improve domestic violence protection legislation.** Improving domestic violence protection legislation in Bulgaria is essential, especially as the country has not ratified the Istanbul Convention. Additionally, implementing the principles of the 4 Ps – Prevention, Protection, Prosecution, and coordinated Policies – can further help mitigate GBV. The success of these initiatives depends on correctly understanding the scope of the problem, which can only be achieved through robust evidence collection and analysis. A critical step forward in this direction is the introduction of the National Information System for prevention of and protection against domestic violence. This system should yield valuable data to inform policies, enhance intervention effectiveness, and ultimately improve protections for victims.
- **Empower victims and local communities in vulnerable regions.** Empowering GBV victims requires both institutional support and grassroots community engagement, especially in vulnerable regions like Sofia and Vidin, identified as high vulnerability areas by the Vulnerability to Gender-Based Violence Index. Measures such as Community Watch Programs can help create safe environments for women and girls. Community empowerment initiatives should focus on raising awareness, providing resources, and encouraging local action. Women’s economic empowerment should also be emphasised to help victims escape cycles of violence and corruption.
- **Simplify and strengthen reporting channels for victims.** Following the legal amendments adopted in 2023, which primarily address domestic violence, it is essential to assess how effectively these changes support victims. A comprehensive evaluation of the reporting process should identify any gaps or persisting challenges, including bureaucratic, financial, or corruption-related barriers to victims’ access to justice. Based on this assessment policy makers can make an informed decision on whether the amendments have achieved their purpose or further reforms are needed to protect victims’ privacy, provide safe and accessible reporting channels, and ensure timely responses from institutions. As GBV has many forms, including trafficking, cyber violence, and workplace harassment, it is essential that procedural measures are tailored to facilitate reporting and meet the needs of all victims.
- **Broaden the scope of anti-corruption strategic communication.** Anti-corruption campaigns should move beyond high-level corruption, e.g., political scandals or corporate fraud, to highlight the everyday impact of corruption on access to services that are essential for GBV victims such as healthcare, legal aid, police protection and justice. Media and advocacy groups should emphasise the link between corruption and GBV, showcasing how institutional weaknesses prevent survivors from receiving the support they need. This narrative shift could help garner broader public support for anti-corruption efforts that directly impact individuals’ lives.

- **Tailor anti-Corruption campaigns for different audiences in high vulnerability regions.** Targeted anti-corruption campaigns are needed in high vulnerability regions like Sofia, Vidin, Montana, Smolyan, Sliven, Haskovo, and Burgas, aimed at policymakers, law enforcement, healthcare workers, and citizens. For policymakers, the campaigns should highlight the societal and economic costs of corruption, particularly corruption affecting GBV victims. For law enforcement and healthcare workers the campaigns should focus on how corruption undermines essential service provision and impacts public health outcomes. Local leaders and community organisations should be engaged in training initiatives that address regional dynamics, thus empowering them to demand accountability and transparency from authorities. Anti-corruption efforts that are tailored to the local contexts are more likely to deliver results in countering both corruption and GBV.
- **Strengthen transparency and accountability in institutions starting in high vulnerability regions.** Corruption, particularly in institutions tasked with addressing GBV, should be treated as a critical rule of law issue. Strengthening transparency and accountability mechanisms within these institutions can help restore public trust and ensure that GBV victims are protected. Additionally, a systematic analysis of institutional failures related to GBV and corruption should be undertaken, preferably as part of broader rule of law reforms. Targeted policy measures should first be piloted in regions identified as most vulnerable to corruption and GBV (such as Sofia and Vidin) and then evaluated in view of their replication in other regions.
- **Account for regional disparities in corruption vulnerability and restore public trust in institutions.** In addition to striving for a long-term reduction in high-level corruption, targeted short-term efforts to reduce administrative corruption in vulnerable regions are essential. A perspective on corruption should be applied, focusing on the unique challenges faced by women in these areas.
- **Enhance monitoring and data collection at both national and regional levels.** More thorough data collection and monitoring are necessary with clear targets set for reducing corruption, improving prosecution rates, and assessing the effectiveness of anti-corruption policies in target risk areas. Regular data collection should provide actionable insights and allow for timely responses to emerging challenges.
- **Encourage collaboration between public institutions and CSOs in high vulnerability sectors.** Public institutions should partner with CSOs to improve transparency, find effective solutions, and create grassroots pressure for reforms, especially in regions facing particular difficulties, such as lack of capacity, economic or socio-demographic issues, or state capture.
- **Conduct targeted corruption risk assessments by independent organisations.** Independent organisations should focus on highly vulnerable regions like Sofia and Vidin and on marginalised groups, such as the Roma community, which face increased risks of both GBV and corruption. Using advanced monitoring and data collection methods like AI and big data analysis could improve assessment of trends and help coordinate responses. Improving coordination between authorities at national and regional level and introducing more sophisticated tools

for data collection and processing are essential for producing digitalised, machine-readable data, that can subsequently be used for developing and implementing reliable monitoring indicators.

- **Integrate gender perspectives into corruption research.** To better understand how corruption uniquely impacts men and women, particularly in marginalised groups, corruption research should incorporate gender perspectives. Similarly, research on justice against GBV should consider how corruption within public institutions, such as law enforcement or the judiciary, can obstruct victims' access to protection and redress. Understanding this intersection will enable policymakers and researchers to develop comprehensive, gender-responsive and corruption-free strategies.
- **Support grassroots communities and organisations in combating corruption at the local level.** Grassroots communities should be empowered to take an active role against corruption through public-private partnerships and targeted funding (both EU and national), especially in high vulnerability regions as identified in the vulnerability to administrative corruption and vulnerability to GBV indexes. By promoting transparency, accountability, and civic engagement within their own regions, such groups can help expose and combat corrupt practices that directly affect their communities. Grassroots organisations should seek assistance from national anti-corruption organisations to leverage resources, training, and support. Additionally, domestic violence CSOs should create synergies with anti-corruption and rule of law organisations, ensuring that efforts to the fight corruption and support victims of domestic violence are mutually reinforcing. Such partnerships can not only build trust in public institutions, but empower marginalised groups to fight for justice and equality.

