

Virtual visit to the country: Bulgaria

Ministry of Interior:

1. Could you develop on the measures in place to mitigate corruption risks in the investor's residence/citizenship scheme?

On 18 January 2022 the Government submitted to the National Assembly a draft legislative act amending the Bulgarian Citizenship Act, adopted at a second reading on 9 March 2022, which revokes the possibility to obtain Bulgarian citizenship on the grounds of investments.

With regard to the right of residence, based on investments, there are guarantees within the procedures at the Migration Directorate. The applications filed by investors, as is the case with all other foreign nationals, and the respective supporting documents are dealt with by a Commission sitting three members. Application and documents are received by a different official – the relevant one at the front desk. Apart from removing irregularities and avoiding gaps, this approach also helps avoiding misuse and corruption practices in the implementation of this activity.

Moreover, enhanced control is introduced with regard to granting the right of residence and its subsequent enforcement based on investments - in the form of both preliminary assessment of the investment and subsequent monitoring of its maintenance.

The amendments to the Foreigners in the Republic of Bulgaria Act of March 2021 introduced the requirement to maintain the investment over the minimal threshold required by the law for a period of 5 years since the date of granting the right of residence. Foreigner nationals who were granted the right of residence based on investments are obliged to immediately declare any change of circumstances regarding the investments they made before the Bulgarian Agency for Investment and respectively - the Ministry of Economy. Upon receipt the Agency for Investment provides this information to MoI Migration Directorate – to a form a basis for a possible decision to withdraw the right of residence. Any change in the circumstances leading to non-compliance with the requirements for the initial issuance of the residence permit is a ground for its renouncement.

2. The input to the Rule of Law report indicates state and local authorities are sectors of high corruption risk. The management and absorption of EU funds (e.g. agriculture) is also indicated as a vulnerable area. Please elaborate how these risks are monitored, and what measures are put in place to reduce the level of risk.

Anti-corruption policies and increased collaboration between the authorities specialised in preventing and counteracting corruption and detecting corruption-related crimes are applied in order to mitigate the risks in sectors vulnerable to corruption. Anti-corruption plans are approved and implemented.

The main structures in the MoI responsible for curbing and detecting corruption among officials from state and local authorities are the National Police General Directorate and Combatting Organised Crime General Directorate. The National Police is responsible for counteracting crimes related to corruption in all its forms, including those affecting EU funds and programs; A special unit is in place at the General Directorate for Combatting Organised Crime engaged in the fight against corruption in the public administration and misuse of EU funds, including under the operational programs..

The priorities set in the National Strategy for Prevention and Fight against Irregularities and Fraud affecting the financial interests of the EU (2021-2027) and the annual action plans to it are followed in the fight against fraud with EU funds. The implementation of the planned activities is reported every six months, and the AFCOS Directorate compiles the information from all managing, law enforcement and control bodies and reports it to the Council for Coordination in the Fight Against Infringements Affecting EU Financial Interests (*information on this Council is also included in the answer to question 4*).

The activities of the MoI structures competent in the in the field of counteracting fraud with EU funds are aimed at:

- increasing interaction and coordination between the managing authorities engaged in operational programs and the relevant MoI structures in order to take effective preventive actions, limit violations and detect crimes related to the use of EU funds;
- optimisation of the operational and search activities and implementation of actions to acquire qualitative advanced information;
- systematic enhancement of the professional qualification of the officials, updating and adapting to the emerging need for improved knowledge, skills and professional practices, etc.

Increased interaction takes place and active joint work with other structures at and outside the MoI, such as the Ministry of Economy, the Agriculture State Fund, the Ministry of Labor and Social Policy, etc. Meetings are held and timely exchange of information is conducted when there are violations found. There is also good cooperation with the Internal Security Directorate when there is a suspicion for the involvement of MoI officers in corruption schemes or practices.

The operational and search activities conducted upon signals and inspections carried out in 2021 by the officers from the National Police General Directorate, the Metropolitan and Regional Directorates of the MoI, in order to combat crimes affecting the EU financial interests, are **178. 14** on-the-spot inspections were carried out jointly with AFCOS and the managing authorities of the operational programs.

In 2021 the General Directorate for Combatting Organized Crime carried out **23** checks following signals for irregular practices linked to absorption of EU funds. Of them **16** were completed and sent to the Prosecutor's Office.

Following the establishment of the European Prosecutor's Office EU institutions, as well as those of the 22 Member States of the European Prosecutor's Office have to report any unlawful act affecting EU budget.

Contact points were set up in the main MoI police structures (National Police General Directorate, General Directorate for Combatting Organised Crime, Border Police General Directorate) and AFCOS to participate in the reporting process before the European Prosecutor's Office. Internal Rules on the Procedures for Reporting and Co- collaboration with the European Prosecutor's Office in compliance with Art. 24 of Regulation 1939/2017 were adopted, and instructions were sent to the Metropolitan and Regional Directorates of the MoI.

The first specialised police operation was conducted by GDCOC officials in February 2022 with co-ordination from the European Prosecutor's Office. 4 persons were detained during this operation and a pre-trial proceedings were initiated for fraud with the aim to obtain resources from EU funds.

Apart from the European Prosecutor's Office, the competent structures of the MoI closely cooperate with the relevant European agencies in this field, such as Europol, Eurojust and OLAF.

3. Can you provide specific examples and data (number and value of cases treated) of cooperation between the Inspectorate Directorate (aka AFCOS) and OLAF?

****The Inspectorate Directorate and AFSOS Directorate are separate structures of the MoI with specific functions and role in the prevention and counteraction to corruption and fraud, as described in the information below.***

AFCOS (Anti-Fraud Co-ordination Service) Directorate within the MoI is a national structure, which facilitates the efficient co-operation and information exchange with the European Anti-Fraud Office (OLAF) as required by *Regulation 883/2013 concerning investigations conducted by the European Anti-Fraud Office*).

In accordance with Art. 12a of *Regulation (EU, Euratom) 2020/2223 of the Council of the European Parliament and the Council of 23 December 2020 amending Regulation (EU, Euratom) No 883/2013, as regards cooperation with the European Public Prosecutor's Office and the effectiveness of the European Anti-Fraud Office investigations*, each Member State has to designate a service to facilitate the effective cooperation and exchange of information, including operational information, with OLAF.

At OLAF's request, AFCOS provides or coordinates the necessary assistance for the effective execution of OLAF's task before, during or after the completion of an investigation.

In the performance of its functions, in 2021 AFCOS Directorate fulfilled **97** requests for assistance related to OLAF investigations. During the same period **20** requests for information or assistance were sent by AFCOS to OLAF.

(For information and statistics on the fight against fraud please see also the answer to the previous question (No 2))

The Inspectorate Directorate is an MoI, structure directly subordinated to the Minister of Interior, which exercises administrative control over the activities of the MoI employees, such as:

- control for observance of relevant laws, bi-laws, internal acts and orders of the MoI managerial staff;
- analyse causes and preconditions for the identified violations and propose corrective measures;
- carry out scheduled or unscheduled checks of structures, activities or processes or upon signals against employees of the MoI;
- exercise control and carry out checks under the Law on Counteracting Corruption and Seizure of Illegally Acquired Property;
- propose initiation of disciplinary proceedings upon detection of breaches of official duties or violations of the Code of Ethics of MoI Civil Servants and the Code of Conduct for Civil Servants in the State Administration

The general principles of the activity of the inspectorates at the ministries and other bodies of the executive power, are regulated in Art. 46 of the Administration Act.

4. How many AFCOS contact points have been appointed in the public administration?

Since 2003 a Council for Coordination in the Fight against Infringements Affecting EU Financial Interests has been operational in Bulgaria (established with a Council of Ministers Decree No18/2003).

In line with the requirements set out in CM Decree 18/2003, each of the members of the Council has designated one official from the respective institution, represented in the Council and one substitute as a point of contact with AFCOS Directorate. The operational cooperation with AFCOS Directorate is conducted through these nominated officials from the structures responsible for the fight against fraud and irregularities. Thus, **17** contact points are currently set up following the provisions of CMD 18/2003.

Besides that, there are contact points in the general directorates of the MoI (*National Police General Directorate, General, General Directorate for Combatting Organised Crime and Border Police General Directorate, etc*).

Three co-operation agreements were concluded in the area of anti-fraud: with the Prosecutor's Office, with the Court of Auditors and with the Anti-Corruption and Illegal Assets Forfeiture Commission.

As required by Art. 117 of Regulation 1939/2017, Bulgaria has notified the European Public Prosecutor's Office that, together with other structures (*mentioned under question No 2*), the AFCOS Directorate is a competent national body for reporting criminal conduct under Art. 24, para. 1 of the same Regulation.

In this regard, since the beginning of 2022, the AFCOS Directorate has reported to the European Public Prosecutor's Office on two criminal conducts in respect of which it could exercise its competences. One of them was established as a result of own activities and the other - by another of MoI unit.

5. Can you clarify the mandate and operational activities carried out by the Interdepartmental Council for Prevention and Counteraction to Corruption?

- a) What are the achievement or results of its activity in monitoring, detecting or preventing corruption?**
- b) Who are the members of this interdepartmental council?**
- c) To whom/which institution does the council report?**
- d) How does it complement/bring synergies with the work of the CACIAF?**

The Council for Prevention and Counteraction to Corruption defines and coordinates the implementation of the anti-corruption measures in the MoI. The Council monitors the implementation of strategic documents in this area, such as the National Strategy for Prevention and Counteraction to Corruption (2021 – 2027) and the Roadmap thereto.

The Council is responsible for drafting annual anti-corruption plans and reporting on them every six months.

The annual plans are drawn in accordance with the model plan elaborated by the Anti-Corruption and Illegal Assets Forfeiture Commission (CACIAF) and approved the National Council on Anti-corruption policies, applicable to all state institutions

After their approval by the Minister of Interior, the Anti-corruption plans, as well as the annual and bi-annual reports on their implementation are sent to CACIAF, which prepares its Annual report with recommendations.

A Deputy Minister of Interior chairs the Council. Its members are the Secretary General and Deputy Secretary General, Administrative Secretary, the directors of the General Directorates, the Director of the Metropolitan Directorate of the Interior, the directors of Internal Security, Inspectorate, Coordination and Information and Analytical Activities, Legal and Human Resources directorates, the Director of the Psychology Institute, the Rector of the MoI Academy and the Heads of the units for internal audit and material checks. The Council reports to the Minister of Interior.

The existence of such an interdepartmental coordination collegiate body for monitoring the implementation of the policies in this area is defined as a good practice in the recommendations of the National Council for Anti-corruption Policies.

6. It is indicated the introduction of “an integrated mobile surveillance system such as a body camera of traffic patrols, an automatic tracking of the location of vehicles, as well as use of automatic payment tools (POS), including in border/customs zone:

- a) Can you specify/clarify how this system facilitate the prevention or prosecution of corruption?**
- b) How many and which types of cases of corruption were either prevented, mitigated or stopped thanks to this system?**

Video surveillance is used in the cabins and routes of the Border Crossing Points - in order to prevent, limit and detect acts of corruption of the officials carrying out border checks. The recordings from the video surveillance are also used in disciplinary proceedings, in order to prove possible violations.

On the next place, in order to decrease corruption risks in traffic police, a system for video surveillance of the traffic control has been implemented. All service vehicles used for traffic control are fitted with this system, including audio and video. Through the system the Internal Security Directorate exercises control on the activities of traffic police officers.

The experience from using the system showed a strong preventive impact and based of the positive results of its implementation, a decision was taken 2020 that the system be expended to cover also the activities of the uniform public order and safety (patrolling) police.

Thus in 2021 a total of **680** service vehicles on the territory of the country were equipped with the surveillance system.

The activities of the officers are monitored in real time through personal police cameras and cameras for audio-recording and video-surveillance installed in the service cars.

Around 3 400 000 video files recorded in the system were examined in 2021. Information has been received for **319** punishments imposed on officials based on the usage of the system (*this number inter alia includes cases of violations of discipline, infringements of the regulations for carrying out the respective activity, established through the use of this system, as well as attempts to eliminate the system itself*).

Improved connectivity of systems and databases was introduced, including at Border Crossing Points, e.g. in the field of traffic control, which allows for automated checks for fines, due but not served under the *Road Traffic Act*, the *Insurance Code*, etc. and allows to serve them to the persons concerned through a mobile printer in the vehicle of the road traffic police, at the Border Crossing Point, in the respective units of Regional Police Stations, etc. and accept payment of the due fines through POS terminal devices.

The installed software allows to monitor activities of the road traffic police officers performed through the use of their remote access devices. These solutions limit the risk of omission by the administrative authority, which should impose sanctions and require proper responsibility on the part of the offender and decrease vulnerability to corruption.

In the recent years, a portal for electronic services was set up by the MoI, which are continuously developed and upgraded by adding new capabilities and new types of services.

7. It is indicated that a system of rotation for “employees dealing with administrative services to citizens (including border control and traffic control continues”

c) How many employees were affected by this rotation system?

a) What is the procedure and conditions for the rotation?

b) Is there any data on the effect of rotation on the prevention of corruption cases?

According to the MoI Anti-corruption Plan, rotation is applied with respect to officials working in areas or performing activities of high risk of corruption.

The Border Police General Directorate has introduced the principle of rotation in the work of the border police officers from different shifts and groups within the same border crossing point, as well as in the transfer of officers from one border crossing point to another. All border crossing points at the border with Turkey as well as Kalotina BCP at the border with Serbia and at Gyueshevo BCP at the border with the Republic of North Macedonia use a special software for rotation through which the work positions of the border police officers are switched during the work shifts at random time intervals. All officers exercising border control are included in the rotation.

As regards migration control, rotation of Migration Directorate officials is applied at administrative desks serving third country nationals and EU citizens. The officers to check the residence of foreign nationals and to conduct interviews with regard to the submitted requests for residence permits are chosen at

random. Surveys of the satisfaction with the administrative services provided are conducted at the desks for submission of documents.

The distribution of the police officers on patrol is done on the principle of rotation and every officer covers different posts in the different shifts, which helps prevent corruption practices.

The Bulgarian Identity Documents Directorate rotates its officials providing administrative services at the desks of the Directorate. The officials are trained to perform activities in areas with high corruption risk.

The activities of the Internal Audit Unit are performed by different teams for providing assurance and for consultations.

The Regional Directorates of the MoI rotate their officers based on risk assessment and when this is possible (enough officers in the specific area of work).

The rotation is based on organizational orders of the Directors, whereupon the respective schedules are approved and the organisation of the rotation is determined reflecting the specificity of the respective units or activities. In the Metropolitan Directorate of the Interior and the Regional Directorates of MoI the rotations are usually between the different local stations and the schedule is made on a monthly or weekly depending on the established practice in the individual Directorates. This rotation is applied so as to avoid formation of permanent teams of officers on duty.

8. It is indicated that “a policy for transparency and improving public awareness of the actions taken in the field of prevention and combating corruption in the Ministry of Interior is being implemented”

a) Can you tell us more about the elements and goals of this policy?

A special section is created on the MoI website dedicated to the efforts against corruption in the Ministry. The MoI Anti-corruption plans of and the reports of their implementation are published on this website.

There is a possibility for the citizens to submit signals through an e-form that can be found in this section or through a 24/7 telephone line of the Internal Security Directorate for corruption or other violations or crimes committed by MoI officers.

Each signal is being timely processed and checked by the Internal Security Directorate or is forwarded to the respective MoI structure. Information on the results of the checks is provided back to the Internal Security Directorate.

The implemented anti-corruption measures are announced through press coverage in the mass media or in any other appropriate way.

Different surveys are performed of the satisfaction of citizens with the provided services.

Detailed information is maintained on the webpage of each MoI structure, which provides public services including on the type of service, legal requirements, necessary documents and the applicable fees.

The policy in this area is aimed at raising the trust in the MoI and its structures. Therefore, different initiatives are implemented, including in the framework of community policing, such as lectures at schools on road traffic safety (for younger pupils) and child criminality (in higher grades). Thus children and youth are acquainted with the police work and the opportunities for co-operation and interaction with the community in order to have successful policing.

b) Who is monitoring the implementation of the policy?

c) What is the timeframe of the policy?

Most of the initiatives are included in the annual Anti-corruption plans of the MoI, whereas the Council for Prevention and Counteraction to Corruption in the MoI is monitoring, analysing and reporting on their implementation.

All enumerated initiatives are implemented permanently.

Besides the abovementioned, there are measures in the MoI Anti-corruption plan for 2022, aimed at ensuring publicity of the efforts in the field of prevention and fight against corruption, which include:

- providing updated information on the official website of the Border Police General Directorate on all requirements related to citizens' crossing the border and their residence in foreign countries as well as the competences of the Border Police officers in cases of violation;
- providing an e-mail address and maintaining a 24/7 telephone line and fax, through which citizens can report problems when traveling through the Bulgaria border crossing points or incorrect treatment by officials;
- participation of the MoI officials in meetings, public fora and information campaigns, aimed at interested government institutions, NGO, business and media on topics related to the fight against irregularities and fraud affecting the financial interests of the EU, *etc.*

9. Concerning anti-corruption training provided by the MoI Academy:

a) Which types of courses are available?

b) Who is eligible to attend the courses?

c) In the past year, which courses were delivered on anticorruption?

d) How many and which type (sector, seniority) of officials attended the classes?

The MoI Academy provides trainings on anti-corruption topics, both during the initial and the additional training for updating and raising the professional qualification or for specialisation.

The courses are available to officers at management, executive and junior executive positions, as well as to civil servants working in the fields prevention of administrative and internal corruption.

The anti-corruption training is provided by two types of structures, namely: the Police Faculty and centres for specialised police training (three centers in total).

In the Police Faculty **33** trainings were held in 2021 covering anti-corruption topics, as listed below:

- 16 courses for initial professional training – for **645** officers;
- 10 courses for raising the professional qualification – for **190** officers;
- 7 courses for professional specialisation, including for police investigators – for **36** officers.

The following closely specialized courses were also held in 2021 with the participation of a total of **41** police officers::

- „Current problems of the counteraction to corruption” and
- „Corruption and corrupt behavior. Counteraction of corruption “

All **39** courses held in 2021 in the centers for specialized police training include anti-corruption content and a total of **663** employees at junior executive positions were trained.

Besides the training provided by the MoI Academy and the centres for specialised police training, classes are held within the framework of professional training at the workplace with all officials with police powers - on matters of official discipline and the provisions of the Penal Code on "corruption" and "bribery" and means to detect and combat corruption.

In this regard, **283** trainings were held in 2021, of which:

- **62** in the general directorates of the Ministry of Interior
- **217** in the regional directorates of the Ministry of Interior,

- **21** in the Migration Directorate (Central Directorate and regional units) - with the participation of **267** officials.

Furthermore, specialised trainings are held in the field of public procurement, which is one of the identified areas with higher risk of corruption.

A total of **55** trainings were held In 2021, for employees involved in conducting public procurement, focused on the implementation of the requirements of the Public Procurement Act and the Rules on application of the act and on the methods of work with the Centralized Automated Information System "Electronic Public Procurement" (CAIS EPP), as follows:

- 2 trainings at the Institute of Public Administration on "Working with the Centralized AIS "Electronic Public Procurement"-CAIS EPP" with the participation of **90** employees under the Civil Service Act;
- 18 trainings on "Implementation of the Public Procurement Act" with the participation of **82** employees under the Civil Service Act and **4** employees under the Ministry of the Interior Act;
- 3 trainings "Identifying the needs and public procurement planning" - with the participation of **34** employees under the Civil Service Act;
- 2 distance-learning courses of the Public Procurement Agency on the topic "Centralized AIS" Electronic Public Procurement" in which **50** employees were trained;
- training at the Center for European Training on "Latest amendments in the Public Procurement Act 2021. Practical work with CAIS "EPP"- from the preparation of public procurement through the system to the conclusion of a public procurement contract";
- training at the School of Public Finance on "Case law of the European Court of Justice on the implementation of public procurement directives";
- training in "SIP-2000" Ltd. – „Update in the tendering procedure of electronic and public procurement (e-public procurement). Current issues in the implementation of the Public Procurement Act and the Rules on the application of the act. Practical tips for working with CAIS-EPP", etc.

There are also trainings held for the employees of the Internal Audit Unit on the method of verification of public procurement and for employees who carry out inspections. 6 such trainings were held in 2021.

Trainings are also organised for employees of structures that provide administrative services - in the form of refresher training under the Ordinance on Administrative Services.

In 2021, a total of **125** such trainings were held, of which:

- **52** in General Directorate "National Police" and
- **73** in the regional directorates

10. Concerning civil servants, can you update on the enforcement of the code of conduct, in terms of:

- a) Number and type of disciplinary cases generated (open, assessed and terminated, with or without sanctions)**
- b) Number and type of education, training or awareness raising events or initiatives**
- c) Number and type of counselling, advices provided to civil servants, including the most recurrent/important topics;**

The rules of ethics for MoI officials are incorporated in:

- The Code of Ethics for the civil servants at the MoI – for the officers with police functions and
- The Code of Conduct for Civil Servants in the State Administration – for the officials under the Civil Service Act and the ones working under labour contracts.

Disciplinary responsibility is assigned for breaching the rules of ethics. The Ministry of the Interior Act prescribes reprimand, as well as dismissal in cases of serious breaches, degrading the image of the institution.

- **103** disciplinary sanctions were imposed in 2021 for violations of ethical rules, as well as
- **47** sanctions for more serious violations, incompatible with the ethical rules, degrading the image of the institution.

The training under the *Code of Ethics for Civil Servants in the Ministry of Interior* is part of all initial training courses at the Academy of the MoI and **16** initial training courses were held in 2021 with the participation of **645** employees.

In addition, in accordance with the MoI Anti-Corruption Plan, refresher training on the Code of Ethics for Civil Servants in the Ministry of Interior and respectively – Code of Conduct for Civil Servants in the State Administration, are being organised in all structures of the Ministry of Interior, as follows:

A total of **550 trainings** were held in 2021 in the MoI structures, of which:

- **173** in the general directorates;
- **365** in the regional directorates;
- **12** in the directorates of the general and specialised administration.

11. Can you update on the implementation of the rules on verifications of declarations of property, in terms of:

- a) Number and type of verifications of declarations of property and interests of persons holding senior public positions;**
- b) Type of findings following the examination, including number and type of conclusions, with or without sanctions applied;**
- c) Update on the publication of the declarations through the Register of Senior Public Office Holders (on the webpage of the Anti-Corruption Commission)**
- d) It is indicated that a public procurement has been announced under the Public Procurement Act with the subject "Development of an electronic public register of electronic declarations of circumstances related to the prevention and establishment of conflicts of interest and property declarations"; when the electronic system for asset declarations will be in place?**

12. Could you kindly update on the implementation of the rules on conflict of interest and incompatibility measures for civil servants, in terms of

- a) Number and type of cases generated (open, assessed and terminated, with or without sanctions);**
- b) Number and type of education, training or awareness raising events or initiatives taken;**
- c) Number and type of counselling, advices provided to civil servants, including the most recurrent/important topics**

The property and interest declarations of senior public position holders are filed before the Anti-corruption and Illegal Asset Forfeiture Commission. They are verified and made public by this Commission.

The positions identified in the law as *high public positions* are exhaustively enumerated in the *Act on Counteracting Corruption and Seizure of Illegally Acquired Property*. Within the MoI such positions are the positions of: the Minister and Deputy-Ministers, Head of cabinet, Secretary general and his Deputy, Administrative secretary, directors of general and regional directorates and their deputies, directors of the Internal Security Directorate and the Inspections Directorate, as well as the persons authorised under the Public Procurement Act by public assignors, who fall under the regulations of this Act, to organise and hold public procurement procedures and sign contracts.

The activities related to submission, publishing and verification of declarations, the terms, facts and circumstances to be declared, are stipulated by the *Law on Counteracting Corruption and Seizure of Illegally Acquired Property*. Internal rules are adopted in the MoI on the organisation and the order for carrying out checks of declarations and identifying conflict of interests.

The MoI Inspectorate Directorate carries out checks of declarations in the following cases:

1. signal for corruption-related violation or conflict of interests;
2. data for corruption-related violation or conflict of interests, which are available to them on other occasions, such as disciplinary proceedings or other checks or inspections;
3. following an assessment of the corruption risk¹.

Proceedings for identification of conflict of interests are initiated in three instances: whenever a signal is filed, *ex officio* – by the assigning authority, and following a request of the person, against whom it is to be initiated.

Annually, by the 15th June, the Inspectorate Directorate draws a report to the Minister of interior, where they list – by name and by structure – the officials who have not filed their annual asset and interest declarations within the specified deadlines. Checks for compliance with the deadline is made in each MoI structure. Whenever violations are identified, disciplinary responsibility is assigned. Following disciplinary proceedings initiated in 2020, the service of 4 officials, has been terminated on these grounds.

The declarations of MoI officials are published in an e-register, which can be accessed by the public on the MoI webpage.

The Inspectorate Directorate provides constant methodological support to the MoI structures as regards the process of filling in, processing, storing and verifying declarations and identification of possible conflict of interests.

13. Concerning the police, and the activity of the Standing Committee on Human Rights and Police Ethics in the Ministry of Interior, can you please indicate:

- a) Number and type of disciplinary cases generated (open, assessed and terminated, with or without sanctions)**
- b) Number and type of education, training or awareness raising events or initiatives**
- c) Number and type of counselling, advices provided to civil servants, including the most recurrent/important topics**

In order to improve the protection of human rights and guarantee the implementation of police ethics, a Permanent Committee was set up in 2003.

Its mission and main functions are, as follows:

- Constant improvement of the performance of the competent MoI structures while carrying out their law-enforcement functions – in compliance with the European standards;
- Improving the procedures and practices on protection of human rights within the MoI;
- Endorsing ethical rules of behaviour.

The priority activities of the Committee are aimed at improving the legislative framework, defining and implementing best practices within the MoI structures, holding trainings and cooperation with government and non-government organisations, national and international institutions.

¹ These grounds are not currently implemented, as the risk assessment should be made on the basis of methodology adopted by the Commission, which has not yet been done

Regional committees for human rights and police ethics have been set up at the Metropolitan and Regional Directorates of the Interior.

(Statistics on disciplinary proceedings for violations of ethical rules are included in the information on question 10 above)

In 2021, in pursuance to the Plan of Action of the Permanent Committee on Human Rights and Police Ethics in the MoI, trainings for officials with police powers were held in the structural units of all Regional Directorates of the MoI (RDMoI), covering areas such as:

- Ethical norms of behaviour and observance of human rights in the daily activities of civil servants in the Ministry of Interior;
- Characteristic features of persons with mental disorders and specific action towards them, in compliance with human rights standards;
- Observance of human rights standards during mass events - meetings, rallies and demonstrations;
- Enhancing the professional qualification of police officers with regard to detention, issuance of arrest warrants, escorting; use of physical force and weapon - with the aim to prevent human rights violations

Theoretical and practical courses have been developed to increase the level of professional competence of the MoI officials in performing tasks, related to protection and restoration of public order; tactics for police action in securing events; lawful use of special means; prevent exceeding the statutory powers and avoid cases of police violence.

According to the data in the Report on the activities of the Committee in 2021, trainings, including for raising the professional qualification of employees with police powers, on the above-mentioned topics were conducted by regions, as follows:

- RDMoI - Sliven – **48** trainings;
- RDMoI - Vidin – **86** trainings;
- RDMoI - Silistra – **5** trainings;
- RDMoI - Ruse – **43** trainings (for a total of **124** officers);
- RDMoI - Lovech – **7** trainings;
- RDMoI – Pernik – **4** trainings (for a total of **12** officers);
- RDMoI - Razgrad – **25** trainings;
- RDMoI - Yambol – for a total of **233** officers;
- RDMoI - Varna – for a total of **450** officers.

Lectures by members of the Regional Committees on Human Rights and Police Ethics are given in most of the trainings. Members of these Committees provide methodological guidance, e.g. by including specific topics, based on the most common violations, related to exceeding statutory powers, use of physical force, special means or weapons, with emphasis on practical training and monitor the whole training process.

Specific cases are being examined, including from the jurisprudence of the European Court of Human Rights and its judgements concerning Bulgaria.

Other topics of trainings conducted in the same period in order to enhance professional qualification of police officers include:

- Protection of human rights in a multiethnic environment;
- Work with vulnerable groups, victims of domestic violence and children at risk, asylum seekers in Bulgaria, *etc.*;
- Legal grounds for self-defense of police;
- Guidelines for the work of police officers with victims and witnesses of crime, offenders and detainees;
- Respect for the human rights and freedom of citizens and non-discriminative behaviour;
- Police ethics and police practice.
