



THB: from exit to insertion, barriers and leverage
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STUDY ON THE PUBLIC STRUCTURES TO HELP VICTIMS OF TRAFFICKING IN HUMAN BEINGS

CONTEXT

Trafficking of human beings is a modern-day slavery. Victims are often recruited, transported, harboured by force, coercion or fraud in exploitative conditions, including criminal activities, sexual exploitation, forced labor or services, begging, or the removal of organs. Human trafficking violates numerous human rights, including the right to life, the right to physical integrity, the right to be free from torture or other cruel, inhuman and degrading treatment, illegal deprivation of liberty and the prohibition against forced labor and slavery-like practices. In addition, THB is a form of crime which takes different forms and shapes, and easily adapts to ever changing social and economic circumstances. It usually targets vulnerable women and girls but also children and men.

Bulgaria is a source and, to a lesser extent, a transit and destination country for women and children who are subjected to trafficking in persons, specifically forced prostitution and men, women and children subjected to conditions of forced labor. Bulgarian women and children are subjected to forced prostitution within the country, particularly in resort areas and border towns as well as in the Western European countries such as the Netherlands, Germany, the United Kingdom, France, Austria, Belgium, etc. ethnic Roman women and children account for approximately 15 % of Bulgarian trafficking victims. Bulgarian men, women and children are subjected to conditions of forced labor in Greece, Italy, Spain and the United Kingdom. Some Bulgarian children are forced into street begging and petty theft within Bulgaria and also in Greece and the United Kingdom.

Trafficking in human beings is deeply rooted in vulnerability to poverty, gender inequality, violence against women, lack of social integration, lack of employment, lack of access to education, discrimination and child labor, lack of democratic culture, conflict and post-conflict situations. Because of the reasons outlined above this pervasive phenomenon requires an integrated multi-disciplinary approach with the involvement of a diverse set of actors.

NATIONAL LEGAL FRAMEWORK

Pursuant to Article 5, paragraph 4 of the Bulgarian Constitution, international treaties which have been ratified in accordance with the constitutional procedure, have been promulgated and have come into force with respect to Bulgaria are part of the Bulgarian legislation and have primacy over any conflicting provision in domestic legislation. In this regards, all the international and European treaties mentioned above are part of the Bulgarian domestic legislation and all their regulations should be perceived as part of the domestic legislation. In this way, Bulgaria has adopted the idea that trafficking in human beings constitutes a violation of human rights and an offence to the dignity and the integrity of the human being.

The national legal acts related to trafficking are:

Criminal Code

Criminal Procedural Code

Action against Human Trafficking Act

Assistance and Financial compensation of Victims of Crimes Act

Protection of Individuals at Risk in Relation to Criminal Proceedings Act

Legal Aid Act

Regulation governing the shelters for temporary accommodation and centres for protection and assistance of victims of human trafficking

Regulation of the organization and activity of the National Commission for Combatting Trafficking in Human Beings

National Mechanism for Referral and Support of Trafficking Persons

Additional documents

Regulation for the Application of the Social Assistance Act

Child Protection Act

Regulation of the Child Protection Act

Code of Conduct for the Prevention of Trafficking and Sexual Exploitation of Children in Tourism

Bulgarian Identity Documents Act

Asylum and Refugees Act

Aliens Act

Coordination Mechanism for Referral, Care and Protection of Repatriated Unaccompanied Minors

The definition of the crime “human trafficking” is provided in the Bulgarian Criminal Code (Chapter IX “Human Trafficking”) - Article 159 a, paragraph 1, according to which: *“[t]he person who recruits, transports, harbours or receives an individual or groups of persons with the purpose of being used for lechery practices, for forced labour, for removal of organs or for servitude, regardless of their consent, shall be punished with 2 to 8 years imprisonment and BGN 3 000 to 12 000 fine”.*

Under Article 159 a, paragraph 1 of the Criminal Code, the trafficker is criminally responsible even in cases where the victim was aware of the activity s/he would be involved in and consented to it, which is often the case. Under this provision, a trafficker can be punished even if s/he did not use the ‘special means’ – coercion, force, deceit etc – provided in Article 159 a, paragraph 2 as special elements of the crime leading to higher punishment.

The special means contained in Article 159 a, paragraph 2 of the Criminal Code are:

“When the act under paragraph 1 was committed:

- 1. with respect to a person below 18;*
- 2. through the use of coercion or deceit;*
- 3. through kidnapping or unlawful deprivation of liberty;*
- 4. through the use of condition of dependency;*
- 5. through abuse of power;*
- 6. through promising, giving or receiving profits*

The punishment is deprivation of liberty from 3 to 10 years and a fine from BGN 10 000 to 20 000.”

According to article 159 b of the Criminal Code, trans-border trafficking is a crime as well: *“The person who recruits, transports, harbours or receives individual or groups of persons and transfers them across the border of the country with the purpose of Article 159 a shall be punished with 3 to 12 years imprisonment and BGN 10 000 to 20 000 fine.”*

According to Article 159 c of the Criminal Code, "The person, who uses a victim of human trafficking for lechery practices, for forced labour, for removal of organs or for keeping her/him in servitude regardless of her/his consent, shall be punished ..."

The crime of trafficking resembles very much the crime of "recruitment for prostitution" set forth in

Article 155 of the Criminal Code which provides:

- (1) A person who persuades an individual to practise prostitution or acts as procurer or procuress for the performance of indecent touching or copulation, shall be punished by deprivation of liberty of up to three years and by a fine of BGN 1,000 to BGN 3,000.*
- (2) A person who systematically places at the disposal of different persons premises for sexual intercourse or for acts of lewdness shall be punished by deprivation of liberty for up to five years and by a fine of BGN 1,000 to BGN 5,000.*
- (3) Where acts under Paragraphs 1 and 2 above have been committed with a venal goal in mind, punishment shall be deprivation of liberty from one to six years and a fine of BGN 5,000 to BGN 15,000.*
- (4) A person who persuades or forces another person to using drugs or analogues thereof for the purposes of practising prostitution, to performing copulation, indecent assault, intercourse or any other acts of sexual gratification with a person of the same sex, shall be punished by deprivation of liberty for five to fifteen years and by a fine from BGN 10,000 to BGN 50,000.*

Where the act under Paragraph 1- 4 has been committed:

- 1. by an individual acting at the orders or in implementing a decision of an organized criminal group;*
- 2. with regard to a person under 18 years of age or insane person;*
- 3. with regard to two or more persons;*
- 4. repeatedly;*
- 5. at the conditions of a dangerous recidivism, the punishment under pars. 1 and 2 shall be deprivation of liberty from two to eight years and a fine from BGN five thousand to fifteen thousand, under par.3 - deprivation of liberty from three to ten years and a fine from BGN ten thousand to twenty five thousand, and under par. 4 - deprivation of liberty from ten to twenty years and a fine from BGN hundred thousand to three thousand.*

The Action against Human Trafficking Act provides in more detail what the possible means of trafficking are, namely:

"recruitment, transportation, transfer, concealment or acceptance of human beings ... by means of coercion, abduction, deprivation of liberty, fraud, abuse of power, abuse of a state of dependence, or by means of giving, receiving or promising benefits to obtain the consent of a person who has control over another person, when it is carried out for the purpose of exploitation". (paragraph 1 of the Additional provisions)

This civil law provision cannot be used by criminal courts as a definition of the crime human trafficking but different law enforcement authorities and NGOs could use it in the process of identifying victims, considering requests for financial compensation, organizing trainings, etc. Analyzing the national legislative framework, it should be stated that the international definitions of trafficking in human being has not been properly transposed into the national legal criminal system in Bulgaria. The Bulgarian Criminal Code defines human trafficking only by the acts and the purpose: the means appears only as an aggravating circumstance.

According to the Palermo protocol, however, the elements of the crime of trafficking in human beings are three, namely acts, means and purpose. The international legal definition of trafficking thus requires that each of these elements should be present to establish the crime of human trafficking. The only exception relates to child victims for whom the means are irrelevant although trafficking for the purpose of begging is not explicitly mentioned in the Palermo protocol, it is increasingly recognized that exploitation for begging may constitute

trafficking. In this regard, the EU trafficking directive should also be taken into account. In addition, the CoE Convention explicitly covers all forms of trafficking.

In addition, the term “sexual exploitation” does not appear at all in the Bulgarian legislation. Instead, the vague terms “vicious practice” and “debauchery” are used. None of them encompassed the meaning of exploitation. This may pose serious obstacles to the legal protection to the Roma and other persons who are predominantly trafficked for sexual exploitation.

Further, forced labour and servitude are not separated crimes but two of the special purposes of trafficking. Slavery is neither a separate crime nor a purpose of exploitation. The law does not contain a definition of slavery and servitude.

On the other hand, Bulgarian National Programmes for Prevention and Counter-Acting the Illegal Trafficking of People and Protection of its Victims usually list as high-risk groups for its prevention activities women, children, ethnic minorities, unemployed and socially disadvantaged people and includes certain concrete activities aimed at preventing the trafficking of Roma.

TABLE OF INDICATORS for the barriers and the leverages for reintegration and reinsertion of the victims of trafficking in human beings in Bulgaria

BARRIERS	LEVERAGES
<p>Victim status / Reflection period</p> <p>In practice, the line where the victim – from a suffering person who receives help and support during the reflection period – becomes victim/witness in criminal proceedings is very vague. In the authorities efforts to learn as much as possible for the traffickers they literally force the victim to give statements without informing them about the right to a reflection period or by informing them in non-understandable manner, thus depriving them not only from the right to a reflection period but also from their victim status urging them to participate in the criminal proceedings only in their capacity of witnesses, thus depriving them to a list of services provided by the State.</p>	<p>Victim status guaranteed / Reflection period guaranteed</p> <p>According to the Action against Human Trafficking Act, when a victim is identified as such, she/he must be informed about the first set of rights she/he is entitled to, namely the right to a reflection period, the duration of the reflection period – 1 month, the right to psychological help and legal counseling during the reflection period, the right to be accommodated in a shelter for the duration of the criminal proceedings, is she/he cooperated with the authorities, the right to financial compensation for material damages from the State fund.</p> <p>In addition, according to the Assistance and Compensation Act, the Police and the NGOs should inform the victims – from their first contact – about their right to legal aid and the organizations where they can seek it, the conditions and procedures to receive free legal aid, the organizations where they can report the crime, the procedures after lodging a complaint, the right during the trial, the organizations where they can be protected alone or together with their relatives.</p> <p>The effective use of the victim status is a prerequisite for effective reintegration and</p>

	reinsertion further in time.
<p>Lack of information</p> <p>After the identification of the victim, the authorities are under an obligation, according to the Action against Human Trafficking Act, to inform the victims of their basic rights, such as the right to a reflection period, the right to free legal aid and the procedure to receive it, the right to compensation and the competent authorities to which to turn to, etc. This is very rarely done in practice and the victims learn about their basic rights often from other victims and sometimes from social workers or do not learn about them at all.</p>	<p>Obligation to provide adequate and timely information</p> <p>Victims have the right to information about their status, their rights, and the relevant judicial and administrative proceedings, including information of available remedies and services for reintegration. Thus, the victims should be informed properly about their rights in the beginning of the work under THB cases – by the Police, prosecutors, lawyers, social workers and psychologists and should be supported to participate in the judicial proceedings not only as witnesses but also in their capacity of private prosecutors and civil claimants in order to receive compensation for the damages suffered. The victims could use the money from the compensation for their better future life during the process of reintegration and reinsertion in the society.</p>
<p>Interrogation methods</p> <p>The front police officers hold thousands of initial conversations with victims. Often the initial conversations take on a larger scope that involve police officers extracting from the victim’s information about the traffickers, the traffickers’ whereabouts, their methods of recruitment and transportation, the other participants in the trafficking ring etc. Thus, the authorities in fact perform a classic interrogation aimed at collecting data about the perpetrators and the crime, despite the fact that these “statements” cannot be used as evidence, thus troubling the victims with no positive results neither for the proceedings nor for the victims themselves.</p>	<p>Sensitive one time interrogation</p> <p>Sensitive interrogation should be ensured to the victims – one-time interrogation in a “blue room” by experts prepared to work with THB victims. Such an interrogation should save the victims negative emotions and re-victimization by the authorities, which, on the other hand will be useful in the process of their reintegration and reinsertion in the society.</p>
<p>Number of interrogations</p> <p>A natural continuation of the inability of the police to recognize in the trafficked person the victim and not the witness is their absolute insensitivity towards the number of interrogations. Thus, the authorities summon the victim for additional interrogation, whenever they consider that some information is lacking. The additional interrogations sometimes include confrontations with the accused. During the</p>	<p>Sensitive one time interrogation</p> <p>Sensitive interrogation should be ensured to the victims – one-time interrogation in a “blue room” by experts prepared to work with THB victims. Such an interrogation should save the victims negative emotions and re-victimization by the authorities, which, on the other hand will be useful in the process of their reintegration and reinsertion in the society.</p>

<p>trial, the victim is summoned again for an open hearing in the courtroom where s/he has to tell the same story before the judge.</p>	
<p>Length of criminal proceedings</p> <p>Another problem, which the victims face, is the excessive length of the pre-trial and/or court proceedings. Some cases last for years.</p>	<p>Reasonable time of the pre-trial and/or court proceedings</p> <p>It is extremely important timely justice to be served in order for the victims to feel safe and secure and to start again their lives through the existing and new reintegration and reinsertion services and programmes.</p>
<p>Lack of initial support</p> <p>There is lack of initial support such as arrival assistance, immediate and comprehensive medical/psychological examination and treatment, short-term housing and help with various other social, legal and economic needs of the victims.</p>	<p>Initial support by a service delivery organization should be ensured to the victims</p> <p>Such support may include arrival assistance, immediate and comprehensive medical/psychological examination and treatment, short-term housing and help with various other social, legal and economic needs of the victim. The receiving service delivery organization should make every effort to take steps to avoid that a dependency situation occurs through its reintegration programmes, and should aim at helping the victim to achieve a normalized life and self-reliance. Long-term support, however, must be provided by either non-governmental or governmental support structures.</p>
<p>Lack of individual approach to the victims</p> <p>In general, no individual approach is undertaken when the authorities assess a case of trafficking in human beings. The approach is usually formalistic and artificial.</p>	<p>Ensuring individual human rights based approach to the victims</p> <p>The individual human rights based approach to the victims should be conducted by an expert who is mostly familiar with the case: a Police officer, a social worker, a psychologist, an NGO staff member working on the case. The assessment of the reintegration options should aim for successful reintegration and reinsertion in the society. Few criteria should be applied: the victim's needs (physical, psychological, psychiatric, legal, social and economic), the victim's desires, the possibilities available to each victim depending on her/his personal circumstances (age, gender, level of education, work experience, family status), and the level of the victim's motivation. In addition, a situational assessment should be conducted, including the specific socio-</p>

	<p>economic situation in the country and the region when the victim is living as well as the reintegration assistance infrastructure existing in the country and the region. Further, the victim should have a realistic picture of the option existing for her/him in order to avoid unrealistic expectations which could be detrimental to the effective reintegration process. Furthermore, a specific reintegration plan should be adopted for each victim.</p>
<p>Psychological and/or social support of the victims</p> <p>Most of the victims in criminal proceedings act in their capacity of witnesses and not as victims, thus none of them is provided with any type of psychological or social support during the process.</p>	<p>Psychological and/or social support of the victims</p> <p>According to the Action against Human Trafficking Act, when a victim is identified as such, she/he must be informed about the first set of rights she/he is entitled to, namely the right to a reflection period, the duration of the reflection period – 1 month, the right to psychological help and legal counseling during the reflection period, the right to be accommodated in a shelter for the duration of the criminal proceedings, is she/he cooperated with the authorities, the right to financial compensation for material damages from the State fund.</p>
<p>Legal support of the victims</p> <p>The authorities have to inform the victims about their right to have a lawyer and that an <i>ex officio</i> lawyer can be appointed if the victim cannot afford such. However, they do not examine whether the victims correspond to the conditions for appointment of an <i>ex officio</i> lawyer – the victim must request it herself/himself. As a result, usually the victims of trafficking do not receive legal aid and are not legally represented before the investigation authorities and before the court.</p>	<p>Obligatory legal support for the victims</p> <p>Victims have the right to a lawyer to protect their rights, to inform them about their role in the proceedings, to defend their interests and to have their views heard and considered in the criminal proceedings. This includes criminal and civil or other proceedings to claim compensation for damages suffered.</p> <p>Initial access to a lawyer is crucial for the fulfillment of the referral and support mechanism, thus the State provided legal help for the victims, through the Legal Aid Act, should be a standard for the participation of the victims in the investigation phase as well as for their participation in the court proceedings, both criminal and civil.</p>
<p>Protection of the victims' privacy</p> <p>The personal data of the victims is usually used during the court hearings. It should be noted that almost all the court hearings are held in public, thus every person present in</p>	<p>Protection of the victims' privacy guaranteed</p> <p>Victims have the right to protection of their private life and identity. They have the right to request that their life and identity are</p>

<p>the court rooms could obtain details of the victim's personal data and life.</p>	<p>protected during criminal proceedings and that the press and public are excluded from the courtroom. They also have the right to the protection of their safety.</p> <p>The Police should examine whether the safety and security of the victim is ensured in order to guarantee to them smooth process of reintegration and reinsertion in the society.</p>
<p>Protection of the safety of the victims</p> <p>Usually, the victims of trafficking are not protected during the investigation stage as well as during the court sessions.</p>	<p>Ensure the victims' safety and protection</p> <p>The Council of Europe Convention on Action against Trafficking in Human Beings requires a State to take into account a victim's personal safety and protection. Particular needs that must be met are set out in Article 12. These include:</p> <ul style="list-style-type: none"> Appropriate and secure accommodation; Psychological and material assistance; Financial Assistance; Access to emergency medical treatment; Translation and interpretation services; Counselling and information, in particular as regards the Victims of Trafficking legal rights and services available to them; Assistance to enable their rights and interests to be presented and considered at the appropriate stage of criminal proceedings against offenders; Compensation; Access to education for children; Access to Education; Vocational Training; Micro-Enterprise and income generating activities; Job placement.
<p>Compensation</p> <p>Usually, no financial compensation is requested by the victims of trafficking as they participate in the court proceedings only in their capacity as witnesses. Usually, most of them are not represented by a lawyer.</p>	<p>Compensation</p> <p>Trafficked persons have the right to adequate and effective remedies. This includes the right to compensation for material and non-material damages suffered. Compensation for damages may include payment for cost of medical psychical of psychiatric treatment, cost of necessary transportation, temporary childcare, temporary housing, lost income and due wages or the money the victim earned for the traffickers, legal fees, payment for non-material damages resulting from emotional distress, pain and suffering suffered by the victim as a result of the crime committed</p>

	<p>against her/him. The compensation requested and later received by the victims could give them additional financial support for their future lives outside the trafficking networks.</p>
<p>Lack of long term Government reintegration support</p> <p>There is lack of long term Government reintegration support such as medical/psychological examination and treatment/counseling to victims of trafficking in their place of residence; family mediation/counseling; monitoring of the reintegration process in the victim's place of residence; monitoring accommodation and care arrangements for child victims of trafficking; assistance with school reinsertion; development of vocational programmes; vocational counseling and training for victims; job placement and employment counseling; grants for resettlement and for vocational training for victims; assistance for the retrieval of lost documents, such as IDs and passports; legal assistance regarding civil issues (divorce, retrieval of property, civil liability); legal consultation and representation for victims acting as witnesses in criminal case; maintaining emergency and informational telephone hotlines; ensuring the security of the victim by maintaining regular contact; accompanying victims for emotional support as well as assisting them in accessing needed services and ensuring their rights are respected; providing safe transportation.</p>	<p>Longer term reintegration support by the Government should be ensured to the victims</p> <p>Longer term support for victims is necessary for their effective reintegration such as medical/psychological examination and treatment/counseling to victims of trafficking in their place of residence; family mediation/counseling; monitoring of the reintegration process in the victim's place of residence; monitoring accommodation and care arrangements for child victims of trafficking; assistance with school reinsertion; development of vocational programmes; vocational counseling and training for victims; job placement and employment counseling; grants for resettlement and for vocational training for victims; assistance for the retrieval of lost documents, such as IDs and passports; legal assistance regarding civil issues (divorce, retrieval of property, civil liability); legal consultation and representation for victims acting as witnesses in criminal case; maintaining emergency and informational telephone hotlines; ensuring the security of the victim by maintaining regular contact; accompanying victims for emotional support as well as assisting them in accessing needed services and ensuring their rights are respected; providing safe transportation.</p>
<p>Lack of longer NGO support</p> <p>There is lack of longer NGO support to the victims such as family mediation/reunification; medical/health; financial (reinstallation grants, family or dependant support grants); legal; education/vocational training/apprenticeship; income-generating activities; security.</p>	<p>Longer term reintegration support by NGOs should be ensured to the victims</p> <p>Longer term support for victims is necessary for their effective reintegration such as family mediation/reunification; medical/health; financial (reinstallation grants, family or dependant support grants); legal; education/vocational training/apprenticeship; income-generating activities; security. NGOs are well positioned not only to provide direct assistance to victims, but also to conduct, or assist in conducting, the reintegration assessment and preparation and implementation of the reintegration plan. Furthermore, NGOs can</p>

	play a critical role in the ongoing task of monitoring a victim's reintegration progress.
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ARE THE PUBLIC STRUCTURES HELPING THE VICTIMS OF TRAFFICKING IN HUMAN BEINGS?

In 2014, the Bulgarian government decreased victim protection efforts and did not adequately provide for victim services. The prosecution service identified 409 victims of sex trafficking and 27 victims of labor trafficking in 2014, compared with 428 sex trafficking and 56 labor trafficking victims identified in 2013. The government identified two foreign child victims in 2014.

67 signals were presented before the National Commission for Combating Trafficking in Human Beings in 2015 with approximately 200 victims of trafficking in human beings. The prosecution service worked under 294 criminal cases in 2015. 409 victims of trafficking were identified, 27 of which were minors and 6 were underaged.

Observers alleged law enforcement could not effectively identify victims, particularly among the vulnerable refugee population, and noted the border police, refugee authority officials, and consular officials have not referred victims to care providers. Reports indicated police did not proactively search for signs of trafficking among women detained for prostitution, and prosecutors and judges lacked sensitivity when interacting with sex trafficking victims. Victims were often required to give testimony in the presence of the alleged trafficker, and alleged traffickers were permitted to confront victims in court and question them through the judge, including inquiries into victims' previous sexual relationships.

From January to September 2014, the government allocated 69,000 BGN (\$40,100) to NGOs to operate the two State-run shelters, a decrease from 116,313 BGN (\$67,679) allocated in 2013. Each shelter had capacity to house six adult females at a time, and in 2014 the two shelters accommodated 16 female victims in total, a decrease from 29 victims assisted in 2013. Funding for the two shelters lapsed in September 2014. Prior to the funding lapse, NGOs provided victim services in the two national shelters, including medical and psychiatric services and assistance in reintegration, such as preparation for job interviews. In November 2014, the Municipality of Burgas opened one apartment as part of its reintegration plan; victims could stay at the apartment rent-free, though no trafficking victims did so in 2014.

The government operated 15 crisis centers for child victims of violence that could provide shelter and generalized psychological and medical assistance to child victims of trafficking in 2014. The government provided a fixed sum per victim assisted in any of the crisis centers which, according to the State Agency for Child Protection, was insufficient to cover victims' needs, maintain the centers' premises, and attract qualified staff. Despite a 2012 government ordinance prescribing crisis centers to be specialized per type of violence, none of these centers were specialized for trafficking victims. The government did not offer male victims specialized services, including legal aid, reintegration assistance, and shelter. Bulgarian law

allows foreign victims who cooperate with law enforcement to stay and work in Bulgaria for the duration of criminal proceedings before deportation. Foreign victims who choose not to assist in trafficking investigations are permitted to remain in Bulgaria for 40 days for recovery before repatriation; the recovery period for foreign child victims is 70 days. No victims received compensation during the reporting period in 2014; observers reported the process for seeking compensation continued to be overly bureaucratic and authorities did not always inform victims of their right to apply for compensation and legal aid.

The situation did not differ in 2015 as the two State-run shelters were not working and no funding was allocated for the year 2015. It has to be clarified, however, that the State initiated a procedure for allocating the shelters to be officially operated by NGOs – at the end of 2015. One of the shelters in Varna was given to be operated by the NGO which operated it until 2014. The competition in Burgas failed due to administrative proceedings.

The Bulgarian government decreased efforts to prevent trafficking. National coordination was marked by inactivity as the inter-ministerial coordinating body, the National Commission for Combating Trafficking in Human Beings, experienced staff turnover and the long-term absence of a key leader. In stark contrast with previous years, the commission held only one awareness campaign in 2014. It should be clarified, however, that in the second half of 2015 the National Commission for Combating Trafficking in Human Beings started several initiatives after the change in its leadership. Nine local commissions continued to run awareness campaigns targeting vulnerable communities, including schoolchildren.

The government adopted a National programme for preventing and combating trafficking in human beings and for victim protection, as it has done annually in previous years; however, the 2014 programme was not approved until July 2014. The 2015 National programme for preventing and combating trafficking in human beings and for victim protection was only adopted in August 2015.

In March 2015, UNHCR called for Bulgarian authorities to investigate allegations of Bulgarian border authorities routinely pushing back asylum seekers, often with violence, including members of the Yezidi minority who were particularly vulnerable to human trafficking in Syria and Iraq. The government provided anti-trafficking training for its diplomatic personnel, aimed at preventing their engagement or facilitation of trafficking crimes. The government demonstrated efforts to reduce the demand for commercial sex.

In conclusion, the competent State authorities such as the border police, the refugee authority officials, the consular officials, the prosecutor's offices and the court decreased victim protection efforts in 2014 and in 2015 and did not adequately provide for victim services. It was only the NGO sector working adequately for the trafficking victims' protection, including working in the area of prevention of trafficking and for reintegration after the escape of the trafficking networks.

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