

CPT/Inf (2025) 27

## **Response**

**of the Bulgarian Government  
to the report of the European Committee  
for the Prevention of Torture and Inhuman  
or Degrading Treatment or Punishment (CPT)  
on its visit to Bulgaria**

**from 16 to 23 September 2024**

The Government of Bulgaria has requested the publication of this response.  
The CPT's report on the 2024 visit to Bulgaria is set out in document  
CPT/Inf (2025) 26.

Strasbourg, 6 August 2025

## **CONTENTS**

**Response of the Bulgarian authorities to the report of the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment.....3**

**Annex: List of abbreviations used in the response.....25**

**Response of the Bulgarian authorities to the report of the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment on its ad-hoc visit to Bulgaria from 16 to 23 September 2024**

The Bulgarian authorities would like to express their thanks to the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) for the long-standing cooperation and the specific recommendations for improving human rights practices.

After the submission of the Report on the visit to Bulgaria carried out by CPT from 16 to 23 September 2024, the Ministry of Interior (MoI) and the State Agency for Refugees (SAR) can provide the following information on the fulfilment of the respective recommendations of the CPT report:

**Paragraph 9 - The CPT would like to receive detailed information about the precise rules of deployment of the seconded National Police, Gendarmerie and Military Police officers to assist the Border Police. The Committee would also like to be informed whether seconded officers have received any specific training prior to their deployment.**

In 2018, the Council of Ministers adopted the “Action Plan for an Emergency Situation due to Increased Migration Pressure at the Border of the Republic of Bulgaria with the Republic of Turkey” (Reg. No. 812100-11989/29.06.2018), which sets out specific activities for all state structures - the Ministry of Interior, the Ministry of Health, the State Agency for National Security, the State Intelligence Agency, the regional governors of Burgas, Yambol and Haskovo, the State Agency for Refugees.

According to the plan, depending on the migratory pressure and in case of complication of the operational situation to the extent that it cannot be controlled by the forces and means of the border police, the Director of the Directorate General Border Police (DGBP), in coordination with the Director of the Directorate General National Police (DGNP), proposes to the Secretary General of the Ministry of Interior the introduction of forces and means of MoI Regional Directorates to join the security measures along the Bulgarian-Turkish border. If necessary, and following the same procedure, forces and means from the Directorate General Gendarmerie, Special Operations and Combatting Terrorism (DGGSOCT) shall also be involved.

At his discretion, the Director of the DGBP shall also propose to the Minister of the Interior that reinforcements from the Ministry of Defence (MoD) be admitted to the security measures according to a specific allocation (number of forces and means and places of introduction). Ministry of Defence forces and assets shall only be used for logistical support. Military personnel shall not be allowed to carry out tasks independently and shall not carry out search, investigation and apprehension of persons who have committed or are committing illegal acts.

In implementation of the plan, the Ministry of Interior issues an annual order to the Minister of the Interior to conduct a specialized police operation in the area of responsibility of the Elhovo Regional Directorate Border Police (RDBP), with an attached work plan approved by the Secretary General of the Ministry of Interior.

The rules, terms and locations for the deployment of seconded police officers to assist the Border Police authorities, as well as the training requirements prior to their deployment, are specifically set out in these documents.

For the current year 2025, Order No. 8121k-1802/31.12.2024 of the Minister of the Interior includes provisions according to which, prior to their deployment, police officers should be familiarised with written information provided by the DGBP on the specific features of carrying out official tasks at the state border, as well as undergo practical training in the areas of activity. Particular attention should be paid to familiarisation with the Manual on Fundamental Human Rights developed by Frontex, as well as instruction on the prevention of corrupt acts and the unjustified use of physical force, weapons and auxiliary means.

According to the analysis of the migration situation, the order foresees the deployment of a maximum of 736 police officers for 2025 (up to 236 from the DGBP, up to 200 from MoI Regional Directorates, and up to 300 from the DGGSOCT). They shall be rotated every 15 days and, if necessary, the rotation period may be extended to a maximum of 30 days.

In 2024, 1264 new border guard positions were open, which are filled gradually following competitions in line with the capacity of the centre which provides six months of mandatory training before taking up duty. By the end of 2026, this capacity will be fully utilised, eliminating the need for secondments from other MoI or MoD structures.

In all Border Police Stations (BPSs) to whose areas of responsibility officers are deployed, a briefing is conducted immediately upon arrival, during which they are again instructed on the procedures for the use of weapons, physical force, auxiliary means, the Code of Ethics for Ministry of Interior Officers, the Frontex Manual on Fundamental Rights, and the principles of non-inhumane treatment of persons identified and detained.

All seconded officers are assigned to patrols together with border police officers. The tasks to be carried out, the patrol locations, the non-use of unauthorised weapons, physical force and aids and the order of interaction are reiterated in the daily briefings.

Additional training is regularly conducted in MoI structures on topical issues to enhance the professional training of officers and improve the performance of service tasks.

Although MoD forces and assets are only used for logistical support, additional training on the tasks to be carried out, including, if necessary, the use of physical force, shall be compulsorily conducted in the week prior to the deployment period in the relevant structures of the Bulgarian Army for all personnel.

#### **Paragraph 10**

**The Committee therefore reiterates its recommendation that a firm message be delivered to all Border Police officers that any forms of ill-treatment (including verbal abuse) of persons deprived of their liberty are unlawful and will be punished accordingly.**

#### **Paragraph 12**

**The CPT recommends that steps be taken to ensure that all foreign nationals in the custody of the Border Police be enabled to swiftly notify their next-of-kin or another person of their choice of their apprehension and be granted access to interpretation and *ex officio* legal assistance.**

#### **Paragraph 41**

**The CPT recommends that all Bulgarian law enforcement agencies concerned are given a clear and firm message on a regular basis that any form of ill-treatment of apprehended foreign nationals – including demeaning and humiliating actions, threats and verbal abuse – as well as any tolerance of such ill-treatment by senior officers, is unlawful and will be punished accordingly. Moreover, all law enforcement officers concerned should be provided with further practical training relating to the proportionate use of force, including control and restraint techniques, in the context of apprehending foreign nationals at the border.**

**In addition, any allegations or other relevant information indicative of ill-treatment of foreign nationals in the context of border control activities should be effectively investigated and, where offences are found to have occurred, the responsible officials should be held accountable.**

**The CPT also recommends that the Bulgarian authorities take the necessary measures to prevent any practices of the kind described in paragraph 38, that is, forcibly returning irregular migrants arriving at the border or present in the territory of Bulgaria, without any prior individualised screening with a view to identifying persons in need of protection.**

The Directorate General “Border Police” is continuously working to prevent actions by staff members that may lead to violations of fundamental rights. Strict compliance is ensured with international, European and national legislation concerning state border control, the protection of human rights, access to territory for persons seeking protection, and the principle of non-refoulement, as laid down in Article 33(1) of the 1951 UN Geneva Convention Relating to the Status of Refugees.

The DGBP does not tolerate any cases of abuse or violence against individuals crossing the border illegally. Every reported incident is investigated in accordance with the established procedures.

In addition, the cameras of the Integrated Border Surveillance System operate independently on a 24/7 basis, with no possibility of external interference. This ensures that every incident can be easily reviewed and verified. Joint operations with EU Member States under the Frontex framework also serve as a mechanism for monitoring and preventing potential violations of fundamental rights. Every reported case under Frontex cooperation is subject to verification.

A Bulgarian-Turkish Inter-Institutional Joint Committee, operating at a high professional level, holds meetings every three months with the aim of enhancing coordination and cooperation

between the two countries in combating illegal migration, cross-border crime, police actions and all related issues.

The actions of DGBP officers are fully aligned with the principle of non-refoulement, which prohibits organised, unlawful and forceful return to neighbouring territory, as well as police abuse and other acts prohibited under the Charter of Fundamental Rights of the European Union, the Treaty on the Functioning of the European Union, the 1951 UN Refugee Convention, the Schengen Borders Code and other secondary EU legislation.

Border Police applies a strategy of active and visible patrol presence along the state border, which has a preventive effect – individuals attempting to cross the fence independently retreat back into the territory of the neighbouring country.

Compliance with the principle of non-refoulement and the protection of fundamental human rights is further guaranteed by cooperation with the European Border and Coast Guard Agency – Frontex. All procedures involving the detention of third-country nationals are carried out in the presence and with the participation of Frontex guest officers.

All actions by police officers related to apprehension and accommodation, as well as the accompanying documentation (detention order, declaration of rights, personal search report, receipt for returned personal belongings and money, and medical examination) are carried out in full compliance with the provisions of the Ministry of Interior Act and Instruction No 8121z-78 of 24 January 2015 on the procedure for carrying out detention, the equipment of premises for housing detainees and order in them within the Ministry of Interior. The actions of the police authorities exclude committing, provoking or tolerating any act of torture, inhuman or degrading treatment or punishment, as well as acts of discrimination against detainees.

In addition to these ongoing measures, by letter ref. No. 3282r-15566/02.06.2025, all RDBPs have been instructed to ensure that all staff involved in countering illegal migration are reminded of the relevant provisions and principles of international, European and national legislation concerning border control and the protection of fundamental human rights, including access to the territory for persons seeking international protection.

At present, 895 staff members are aware of the letter, which is reported in protocols with three names, date and signature. By the deadline of 27.06.2025, all 3282 border police officers should be familiar with the letter.

By letter Ref. No. 3282r-15134/27.05.2025, it was instructed that all 3282 officers must undergo additional field-based practical training related to the proportional use of force, including control and restraint techniques. Training of trainers is currently underway.

### **Paragraph 11**

**The CPT recommends that steps be taken to remedy the above-mentioned deficiencies. As regards the Border Police detention facility at Kapitan Andreevo in particular, the Committee reiterates its recommendation that it be thoroughly refurbished and cleaned**

Current renovation has been carried out in the toilets serving the Temporary Detention Facility (TDF) at the Kapitan Andreevo patrol base. The identified deficiencies have been addressed, and the walls and ceilings have been patched and repainted. The cast-iron squat toilets with porcelain coating are corroded and require full replacement; additional funding is being sought for this purpose. The toilets are regularly cleaned with disinfectants.

Current renovation (patching and painting of walls and ceilings) of the room for accommodation of mothers with children was also carried out.

CCTV is installed in all detention rooms and is monitored 24/7 by the staff on duty. They react immediately if necessary to provide any assistance to detainees.

For the years 2024 and 2025, a total of 2194 persons were detained and accommodated for a maximum of 24 hours in the detention facilities of the Elhovo RDBP, and at no time during this period the capacity of the facilities was exceeded.

### **Paragraph 15**

**The Law on Asylum and Refugees stipulates that whenever foreign nationals detained at SHTAFs make an asylum application, they should in principle<sup>1</sup> be transferred to a SAR open reception centre within 6 days. However, both SHTAFs visited were accommodating asylum seekers who had been there for longer than 6 days, and some of the staff seemed to interpret the aforementioned provision in the manner that such a transfer was only required once the asylum application was approved. The CPT would like to receive clarification from the Bulgarian authorities on this subject.**

Under the terms and conditions of Article 58 of the Asylum and Refugees Act (ARA), any application for international protection submitted to a state authority shall be sent immediately to the SAR. Upon receipt, SAR shall take immediate action with a view to registering the foreigner within six working (not calendar) days from the date of submission.

In some individual cases in the Special Homes for Temporary Accommodation of Foreigners (SHTAFs), the six-working-day period may be extended for objective reasons.

In 2024, a total of 8165 foreigners in the two SHTAFs submitted applications for international protection. 20 of them, were detained in the SHTAF for more than 6 days after submitting their application, due to matches with databases for possible involvement in terrorist activities and/or threats to national security and additional interviews conducted on the instructions of the State Agency for National Security (14 foreigners); due to the need for the foreigner to appear in court as a defendant/witness (3 foreigners) or due to poor health or an acute infectious disease preventing relocation until the completion of treatment (3 foreigners).

---

<sup>1</sup> Save in exceptional cases, e.g. when the applicant is also suspected/accused of having committed a criminal offence, see paragraph 8 above.

Since the beginning of 2025, 1103 foreigners have applied for international protection. All of them were handed over to the SAR within the six working days deadline, with the exception of one foreigner, due to additional interviews conducted at the request of the State Agency for National Security.

#### **Paragraph 17**

Furthermore, the delegation heard allegations that some of the formally accompanied minors were in fact unaccompanied but the authorities had “appointed” unrelated adults with whom they had been apprehended as their relatives, thereby making it legally possible to accommodate them in a SHTAF. **The CPT would welcome the Bulgarian authorities’ observations on these allegations.**

More generally, **the Committee recommends that steps be taken to ensure that unaccompanied minors are not held in SHTAFs (as is indeed foreseen by the national legislation) and that accompanied minors are only held in SHTAFs when absolutely necessary and for the shortest time possible.<sup>2</sup>**

Vulnerable persons within the meaning of paragraph 1, item 4b of the Additional Provisions of the Foreigners in the Republic of Bulgaria Act shall be accommodated in SHTAF on an exceptional basis and after an assessment of all circumstances relevant to the specific case.

After the actual accommodation in the home, the authorities of the MoI shall commence activities to identify foreigners without identity documents and shall take appropriate measures when establishing new facts and circumstances in their cases. There are frequent cases in which a person's vulnerability is established at a later stage, in the course of interviews with them, after they decide to share their story. In all cases of vulnerable persons, priority is given to removing them from the SHTAFs.

In 2024, 108 unaccompanied minors and children were identified in the SHTAFs, and from the beginning of 2025 to the present, 9 have been identified. The Social Assistance Directorate and the State Agency for Child Protection are immediately notified of each of them, with the average stay of an unaccompanied minor or juvenile in the SHTAFs being 1-2 days.

In 2023 A Memorandum of Understanding and Cooperation between the Ministry of Interior of the Republic of Bulgaria and the United Nations Children’s Fund (UNICEF) in Bulgaria for 2023-2027 was signed. The Working Plan for the period 2025 – 2027 envisages an Activity II-3. Support for monitoring of fundamental rights of unaccompanied and separated migrant children, incl. provision of child-friendly information and consultations to migrant children with regards to the screening procedure, vulnerability assessment, return and regularization.

#### **Paragraph 18**

**The CPT reiterates its recommendation that it be recalled to staff at the SHTAF in Busmantsi that any forms of ill-treatment of detained foreign nationals (including of a verbal nature) are illegal and unacceptable and will be punished accordingly.**

---

<sup>2</sup> See also pages 8 and 9 (“Care of vulnerable persons (in particular children)”) of the CPT Factsheet on Immigration Detention (document CPT/Inf (2017) 3), <https://rm.coe.int/16806fbf12>; pages 10 and 11 of the Bulgarian version to be found under <https://rm.coe.int/1680997dd9>.



In addition to the established mechanisms for work and observance of the rights of persons accommodated in the SHTAFs (initial and ongoing training, daily briefings, control activities), by letter ref. No. 5364p – 11978/28.05.2025 the Director of the “Migration” Directorate expressly ordered the heads of SHTAFs to once again emphasize to employees their main commitments, namely to strictly fulfil their duties, which exclude committing, provoking, or tolerating any act of violence or humiliating treatment. 118 employees from SHTAF – Busmantsi and 202 employees from the SHTAF – Lyubimets have got acquainted with the contents of the letter and have signed declarations certifying this.

All senior officers in both SHTAFs exercise their control functions by carrying out checks according to a monthly schedule approved by the Director of the “Migration” Directorate, which monitors the performance of police officers' duties during and outside regular working hours, as well as during the night, on public holidays, and on weekends. The performance of the duties of the police officers on duty is monitored in order to guarantee the rights of the accommodated foreigners, ensure unhindered access to sanitary facilities around the clock, and respond promptly to their requests.

Both SHTAFs are equipped with 24-hour video surveillance. Control video surveillance is carried out around the clock by employees of two independent sectors (the “Security of Compulsory and Short-Term Accommodation of Foreigners in a Home” sector and the “Operational Duty Centre” sector), who monitor illegal actions and violations of the internal rules. Recordings from the security system are stored for at least 30 (thirty) days.

In 2024, one report was filed regarding abuse of authority by police officers against a foreigner accommodated in a closed-type facility of the SAR. Six independent investigations were conducted into the case, which found that there had been no unlawful actions on the part of the employees of “Migration” Directorate.

#### **Paragraphs 19**

**The CPT reiterates its recommendation that the management and staff of the immigration detention facilities in Busmantsi and Lyubimets remain vigilant and make use of all the means at their disposal to prevent inter-detainee violence and intimidation.**

Conflict situations and fights arise between the accommodated foreigners and this requires the urgent intervention of the police officers to control the situation. The most frequent measures in such situations are the relocation of the foreigners to different sleeping premises and increased surveillance of the persons.

In order to prevent such situations, persons are accommodated according to their nationality, ethnicity, religion etc., being physically separated and having different daily routines.

As a preventive measure to respect the rights of the foreigners accommodated in the SHTAF, the management of Migration Directorate uses all available opportunities to improve the professional training and skills for working in an intercultural environment of the officers. Employees participate in trainings organized by MoI Academy and MoI Psychological Institute, as well as by partner organizations - the Bulgarian Red Cross (BRC), UNHCR, IOM, UNICEF, BHC, etc.

#### **Paragraph 20**

The delegation observed at the SHTAF in Busmantsi that a single adult man was accommodated in the unit for women and families with minors. It was not clear to the delegation what were the reasons for having placed him in that unit rather than with other single adult men. **The Committee would welcome clarification of this fact from the Bulgarian authorities.**

In SHTAF – Busmantsi immediate action was taken to relocate the man himself and staff were reminded of the need to strictly enforce the accommodation requirements in different areas for men and women/families with children.

#### **Paragraph 21**

Material conditions in the immigration detention facilities visited remained extremely poor, with virtually all detainee accommodation areas being overcrowded, dilapidated, dirty and infested with bedbugs. The premises were very prison-like and particularly poorly adapted for the accommodation of women, families and minors.

The delegation noted that, unlike in 2018, detainees at the SHTAF in Lyubimets had access to the toilet at night; however, such access was still extremely limited or even inexistent in Busmantsi, which is totally unacceptable. At the SHTAF in Busmantsi, the delegation also noted that female detainees were obliged to share the same communal toilets and showers with the men, while toilet doors could not be locked and shower cabins had no doors.

Furthermore, there were persistent serious problems with the provision of appropriate clothing (including shoes for minors), personal hygiene items (especially towels) and cleaning products.

At the SAR Closed Unit, foreign nationals told the delegation that they had no access to washing machines. More generally, persons detained at the aforementioned Unit could not – unlike those held in SHTAFs – walk freely in the corridor during the day and had to remain almost permanently locked inside their overcrowded dormitories, which could be considered as amounting to degrading treatment.

#### **Paragraph 22**

**The Committee calls upon the Bulgarian authorities to take urgent steps to remedy the above-mentioned deficiencies (listed in the previous paragraph 21). In particular, all the accommodation areas in Busmantsi and Lyubimets must be refurbished, adequately equipped (including with new beds, mattresses, pillows, bedsheets and blankets) and maintained in a clean condition (free from vermin including bedbugs). Occupancy levels must be reduced in all dormitories and in living containers, to provide the minimum of 4 m<sup>2</sup> of living space per person. All detained foreign nationals must be given ready access to a toilet, including at night, and the communal toilets and showers must be refurbished in a manner ensuring privacy, especially for female detainees in Busmantsi.**

**Further, efforts are required to ensure adequate supply of free-of-charge personal hygiene items (including sanitary pads for women and nappies for infants), cleaning materials and products, and suitable clothing and shoes for detained foreign nationals (including minors).**

The material conditions for the reception and accommodation of foreigners in SHTAF have indeed deteriorated as a result not only of the heavy depreciation of the building stock and the huge human influx, but also of the actions of the detainees themselves.

At the end of 2023, “Migration” Directorate announced public tender, with funds from the Asylum, Migration and Integration Fund, for construction works in the two SHTAFs - overhaul of building installations, reconstruction and renovation of dormitories and sanitary facilities (*including the installation of separate sanitary units for each dormitory*), construction of shelters on the foreigners' walking areas, etc., for which a contractor was selected. However, no contract was concluded due to the significant increase in the prices of materials and services that has occurred in the interim. A new tender with updated prices is to be finalised.

In July 2025, a revised public procurement procedure is scheduled to be announced for the major renovation of the SHTAF – Busmanski facility. Specific actions have been taken to increase the allocated funds by approximately 50%. The selection of a new contractor and signing of the contract are expected no earlier than October 2025.

By mid-July 2025, the installation of outdoor canopies in the yard of the SHTAF – Lyubimets is expected to be completed. A major renovation of the bathrooms and changing rooms has already been carried out.

In a calm operational environment, newly arrived foreigners are distributed proportionally and rationally. The management of the two detention centres acts flexibly and according to the specific circumstances, seeking to allocate the accommodated persons to the dormitories without leading to crowding and overcrowding.

The SHTAF – Lyubimets has a capacity of 660 places (300 in the main building and 360 in the van module), with sufficient space guaranteed according to the accepted minimum living conditions.

The capacity of the SHTAF – Busmanski is 400 places, and arrangements have been made to accommodate the foreigners in dormitories with sufficient living space.

In conditions of increased migratory pressure, the operational situation has necessitated filling the capacity for accommodation in the SHTAFs. No such situation has arisen since 2023.

At present, there are a total of 92 foreigners in the SHTAF – Busmanski, distributed in eight rooms, each measuring 60 sq m.

Foreigners are allocated in the premises according to religious and ethnic affiliation, gender, age, marital status, etc. Each person is also given the opportunity to choose his/her own sleeping quarters, where a minimum of 4 sq m of privacy is guaranteed.

Following a change in the organisation of the work of the police officers, the foreigners accommodated in the SHTAF – Busmanski are now provided with round-the-clock access to the sanitary facilities, which are visited at night by the police officer on duty every 10–15 minutes. The practice in the last months shows that this way of operation is well accepted by the accommodated foreigners and the situation is calm.

Disinfestation of the premises is carried out twice a month. During the treatment and the subsequent sanitary period, the accommodated individuals are temporarily relocated to other rooms or buildings. Personal belongings are frozen for no less than 24 hours, and clothing is

washed at high temperatures – both upon admission and periodically, in parallel with the disinfestation procedures.

In recent months, all bedding inventory has been fully replaced. New refrigerated containers have been purchased, and the chemical agents have been replaced with new ones, which has led to significant improvement. In the last two weeks, only three cases of insect bites have been reported. Efforts are ongoing until the issue is fully resolved.

Each foreign national accommodated at the SHTAF is provided with bedding materials (mattress, pillow, blanket, pillowcase, and sheets). Clothing suitable for the season (e.g., t-shirts, trousers, tracksuits) is also provided, along with personal hygiene items such as soap, toilet paper, toothbrushes, and toothpaste. Those in need are given shoes and slippers.

Adequate quantities of personal items, clothing, sanitary and hygiene supplies are ensured. These are distributed upon admission, according to a regular schedule, or based on staff initiative or individual requests by the accommodated persons.

Bedding materials are changed every 15 days, and toilet paper and soap are distributed. Each room is equipped with a bucket and floor mop, while in the corridors there are cabinets with daily supplies of cleaning and disinfecting agents and waste bags.

At present, there have been no complaints from accommodated individuals regarding these matters.

In October 2024, SAR provided and installed a washing machine to be used by asylum seekers accommodated in the SAR Closed Unit.

#### **Paragraph 24**

**The CPT calls upon the Bulgarian authorities to ensure as a matter of high priority that all foreign nationals in Busmantsi, including those accommodated at the SAR Closed Unit, are offered at least two hours of outdoor exercise every day. The objective should be to increase this entitlement even further, preferably by offering an open-door regime throughout the day. Exercise must take place in yards equipped with means of rest and shelters against inclement weather; despite the Committee's previous recommendations, this has still not been done.**

**More generally, the Committee reiterates its long-standing recommendation that the Bulgarian authorities make determined efforts to offer a range of constructive activities to foreign nationals detained at the SHTAFs in Lyubimets and Busmantsi, as well as the SAR Closed Unit. This should include organised sports, leisure activities (such as computer and board games), schooling, games and toys for minors, and genuine access to television (with foreign TV channels), radio, books, magazines and newspapers (in an appropriate range of languages). Further, to the extent possible, detained foreign nationals should be offered a possibility to engage in work, including on a voluntary unpaid basis (e.g. help with cleaning and maintaining the premises).**

According to the Internal Rules of Procedure of the SHTAFs, the daily routine of the accommodated foreigners – meals, personal time, walks, time for religious worship, social activities, watching television, sports games, and leisure activities – is carried out according to a schedule approved by the head of the SHTAF.

The distribution of activities throughout the day is tailored to the specific characteristics, infrastructure, and workload of the homes, including with a view to preventing conflicts between different groups.

In view of this, the SHTAF – Lyubimets provides for time for walks/outdoor sports games within 5 hours and 15 minutes during the summer season, distributed once in the morning and twice in the afternoon, and 4 hours during the winter season, distributed once in the morning and once in the afternoon. For those accommodated in trailers, outdoor time is unlimited.

With regard to the free movement of asylum seekers in the building of the SHTAF – Busmantsi, mixing of flows of persons accommodated in the SHTAFs and those accommodated in the SAR Closed Unit is not allowed in order to protect their own security and to avoid emergence of conflict. Nevertheless, the rights of persons to free movement and access to sanitary premises in the building of the SHTAF – Busmantsi are ensured and are observed in accordance with generally accepted minimum reception standards.

From June 1, 2025, the time for walks and sports games at the SHTAF – Busmantsi has been increased to a total of 3 hours per day, divided into 1 hour in the morning, 1 hour in the afternoon, and 1 hour in the evening for each group.

Infrastructure changes are planned to allow two separate groups of foreigners to be outdoors at the same time without mixing, which will significantly increase the time spent outdoors.

The two SHTAFs have spacious courtyards with football and volleyball courts, and balls are provided to foreigners upon request.

There are also mobile tennis tables, and rackets and balls are provided for table tennis.

All sports facilities are actively used by the accommodated foreigners.

By mid-July 2025, the installation of the canopy in the yard of the SHTAF – Lyubimets will be completed. In the SHTAF – Busmantsi there is a mobile tent, which is stretched in certain weather conditions, in order to allow the normal overhead walk and outdoor sports games.

By the end of July 2025, additional benches are expected to be delivered, located at the sports grounds.

“Migration” Directorate is constantly looking for opportunities to cooperate with NGOs or international organisations in the field of migration, with a view to implementing projects in the SHTAFs for the organisation of the foreigners’ leisure time.

United Nations Children’s Fund, within the framework of its partnership agreement with the (BRC), expressed its readiness to provide psychosocial support and, if necessary, other activities for children and adults accommodated in both SHTAFs.

In the SAR Closed Unit in Busmantsi, experts of the agency have started carrying out social activities to engage the free time of foreigners by providing chess games, card games and books for reading, including those for individual training in the Bulgarian language. The accommodated asylum seekers have the right to outdoor activities, including various sports activities.

At the SHTAF – Lyubimets, there is a library with a sufficient number of books, including Bulgarian language textbooks provided by UNHCR. In the family accommodation unit, there is a children’s room equipped with toys and board games. Televisions are available in the corridors on both floors.

The SHTAF – Busmantsi also has a training room equipped with computer stations, as well as TV rooms offering foreign-language television channels. The library there offers a wide selection of books in Arabic, English, French, Russian, Spanish, German, Turkish, and Bulgarian, as well as children’s literature. It is standard practice to show these facilities to every newly accommodated foreign national. Access to these areas is free and unrestricted throughout the day. The libraries are periodically updated with new materials. Ongoing efforts are being made to encourage greater interest in the library materials among the accommodated foreigners.

In early June, the SHTAF – Busmantsi received 25 new books and travel magazines in Arabic, as well as 15 books in Urdu and Pashto. Other books and magazines are expected with the assistance of Bulgaria’s diplomatic missions.

The current practice includes activities initiated by the management, in which foreign nationals may participate on a voluntary basis. This has enabled the organisation of football matches between staff and accommodated persons, as well as other sports-related activities.

On average, around 5% of the accommodated foreign nationals at the SHTAF – Busmantsi voluntarily participate in cleaning the premises and maintaining the surrounding spaces. For this purpose, cleaning supplies are regularly provided. Additionally, some individuals assist staff voluntarily in carrying materials during the receipt of deliveries.

<b>Paragraph 26</b>
---------------------

**The Committee again calls upon the Bulgarian authorities to take urgent steps to address the aforementioned serious deficiencies of health-care services at the SHTAFs in Busmantsi and Lyubimets Homes (as well as the SAR Closed Unit). In particular:**

- **the quality of medical screening upon arrival must be improved (including the screening for tuberculosis, other transmissible diseases, mental disorders and other vulnerabilities);**
- **the procedure for the recording and reporting of injuries must be aligned *mutatis mutandis* with the precepts set out in paragraph 27 of the report on the 2017 periodic visit;**
- **regarding the reporting obligation, health-care staff must advise detained foreign nationals of its existence, explaining that the writing of such a report falls within the framework of a system for preventing illtreatment and that the forwarding of the report to the competent prosecutor is not a substitute for the lodging of a complaint in a proper form;**
- **regarding access to interpretation, see paragraph 30 below;**
- **the quality of medical documentation must be improved; in particular, a single and comprehensive individual medical record must be created for every detained foreign national;**
- **confidentiality of medical data must be fully ensured;**
- **all the establishments must be provided with adequate equipment (including life-saving equipment such as defibrillators, oxygen and nebulisers) in working order;**
- **appropriate supplies of free-of-charge medication must be ensured;**
- **detained foreign nationals must be offered a reasonably rapid access to psychiatric care and an improved access to psychological assistance; in respect of the latter, efforts should be made to ensure that the work of psychologists employed in SHTAFs avoids combining two different roles i.e. risk assessment and therapeutic clinical work.**

Immediately after reviewing the CPT report, the director of the Medical Institute at the MoI issued Order № 883/03. 04.2025, ordering doctors at the SHTAFs Busmantsi and Lyubimets to implement the measures and recommendations described in the report regarding the creation of individual medical files with complete medical documentation and strict compliance with the confidentiality of medical data.

The actions of medical personnel in cases of injury, complaints of abuse, or visible signs of violence are explicitly outlined: notification of the management of the SHTAF, photographing with consent, recording, immediate notification of the relevant prosecutor's office, and keeping a register of injuries.

Measures have also been put in place to ensure that life-saving equipment is available and maintained in good working order, and that sufficient quantities of free medicines are replenished and maintained in a timely manner.

In addition, Order No. 1506/06.06.2025 of the Director of the Medical Institute of MoI introduced a form for registering traumatic injuries sustained by migrants as a result of violence and abuse.

In compliance with these provisions, as of June 15, 2025, no cases of mistreatment of migrants have been reported, the medical services at the SHTAF are supplied with a full range of medicines, all diagnostic and emergency treatment equipment is in working order, oxygen cylinders are filled with oxygen, and ECG machines and defibrillators are in charging mode.

Both SHTAFs are also equipped with two nebulizers for medical services to provide emergency care and treatment for acute respiratory failure and asthma attacks.

Only the “Migration” Directorate officer (interviewer) who works directly with a particular foreigner has access to his/her medical data. The information on the health status of the person is essential for the assessment of vulnerability and risks according to the Methodology for Social Work with Foreigners in Detention. At their discretion, information shall be provided to the police officers accompanying the person when removing him/her from the country, or to the police officers guarding the person, in order to provide emergency assistance if necessary, as well as to protect public health in case of a dangerous contagious disease.

Individual and group psychological work with foreigners accommodated in the SHTAFs is based on the principle of informed participation, with respect and observance of their rights, in compliance with ethical and professional standards for the implementation of psychological activities.

Psychological work with foreigners is carried out on the basis of internal regulations and a plan and procedure for interaction between the Institute of Psychology (IP) of the MoI and the “Migration” Directorate. Psychologists hold daily talks with the accommodated foreigners.

Their work aims to provide psychological prevention and prevention of stress and aggressive behaviour; psychological interventions in cases of suicide attempts and individual crisis situations; counselling and therapeutic work (with interpretation provided).

The areas in which psychologists at the SHTAFs carry out psychological work with detainees are:

- psychological interviews to diagnose the current mental state for the purpose of prognosis, planning, and implementation of psycho-corrective impacts;
- psychological counselling in connection with a specific psychological problem reported by the foreigner of an emotional, behavioural, personal, or interpersonal nature, a life crisis, or a pathological process and dysfunctional state;
- crisis intervention in exceptional cases, critical situations, and mental crises;
- psychological prevention aimed at preventing risky and maladaptive behaviour; maintaining mental health and achieving mental well-being.

The psychologists from the IP also perform activities for the employees of the “Migration” Directorate (training of employees, counselling of employees and their families, methodological support for interviewers, counselling of managers regarding approaches and decisions related to the accommodated foreigners).

The IP strives to optimize the psychological assistance provided to foreign citizens in the SHTAFs, as well as to improve the attitude of staff towards them by conducting preventive and educational work by psychologists in the SHTAFs.

Psychiatric care in the medical facilities of SHTAF Lyubimets is provided at Medical Center 1 – Svilengrad, with which Medical Institute – MoI has signed a contract. Steps are being taken



to conclude an additional contract for psychiatric care with the Mental Health Center in Haskovo.

Within the framework of the cooperation between the Ministry of Interior, UNICEF and the BRC, a mechanism has been agreed upon for sending psychologists and psychiatrists to the two SHTAFs when necessary, as well as for providing specific medications.

A medical professional, provided by SAR, carries out the necessary examinations and tests of the foreigners accommodated in the SAR Closed Unit in Busmantsi, with all the results and documents being included in the foreign nationals' medical file, which is stored in accordance with all requirements for the protection of personal data and sensitive information. Individuals undergo free testing by staff from the Regional Health Inspectorate in Sofia in order to identify, possibly treat and prevent diseases such as tuberculosis, HIV/AIDS, etc. When medical care is required, it is also provided by medical personnel from the SHTAF in Busmantsi. When foreign nationals are accommodated, an interview is conducted by a psychologist from SAR using the special "Questionnaire for the Identification of People with Traumatic Experiences". For those who show signs of anxiety and depressive complaints, an examination is carried by a psychiatrist from the International Organisation for Migration and the "Centre Nadya (Nadya Centre)" Foundation. Medicines are purchased for all persons in order to provide the necessary treatment.

During the registration of a foreign national, a social expert of SAR performs an "Identification and Assessment of Vulnerability", which includes a description of the person's specific needs. If the person's belonging to a certain vulnerable group is established, SAR takes all actions to provide access to additional medical, social, psychological and other services and activities.

The social experts of SAR visit regularly the individuals, accommodated in the SAR Closed Unit in Busmantsi. If a complaint is received or a problem is detected by them, it is also reported to the Head of the Accommodation Department, immediately, with the necessary measures being taken. If it is necessary to provide a medical examination of any nature outside the SAR Closed Unit in Busmantsi, foreign nationals are escorted by the MoI, based on an Agreement for Cooperation between the two administrations. All of the mentioned above activities are carried out in the presence of an interpreter in a language understandable to the foreigner.

#### **Paragraph 27**

**The CPT recommends that a thorough and independent inquiry be carried out into the death of Ms S.D., with a particular focus on the quality of the medical screening at the SHTAF in Busmantsi and the medical examination performed at the Ministry of Internal Affairs Hospital. The Committee wishes to be provided with information on the outcome of this inquiry, including regarding any disciplinary or criminal sanctions imposed.**

In a letter ref. No. 812100-7845/25.04.2025, the Minister of the Interior requested the Executive Agency for Medical Supervision to the Minister of Health to conduct an independent investigation into the death of S.D..

#### **Paragraph 28**

**The CPT recommends that efforts be made to reinforce the custodial staff presence at the SHTAFs in Busmantsi and Lyubimets and at the SAR Closed Unit, so as to ensure that**

**there is always enough custodial officers present to provide a safe environment and secure access to outdoor exercise and activities. Further, steps must be taken to recruit social workers, educators and teachers, in particular to work with the detained minors and their relatives.**

Currently, the “Migration” Directorate of the MoI is adequately staffed in accordance with the approved staffing levels. At the end of 2024 and the beginning of 2025, 80 security officers were appointed, 25 of whom based in Busmantsi and 55 in Lyubimets. At present, there are 6 vacant positions for the position of “Security Officer” in the two SHTAFs. A new recruitment procedure is pending.

The provision of social and educational services goes beyond the functional competence of the “Migration” Directorate and positions for such specialists are not included in the MoI pay-roll.

Their involvement in activities for organizing the leisure time of the accommodated foreigners during their stay at SHTAF can only be implemented through project activities. In this regard, the “Migration” Directorate has renewed its talks with the IOM and Caritas as long-standing partners with experience in social activities, with a view to implementing new projects with the foreigners in the SHTAF.

United Nations Children’s Fund, in partnership with the BRC, has expressed its readiness to provide psychosocial support and, if necessary, other activities for children and adults accommodated in the two SHTAF.

#### **Paragraph 29**

**The Committee reiterates its recommendation that more efforts be made in the immigration detention establishments visited to improve staff’s training in languages most commonly spoken by detained foreign nationals and inter-cultural communication. See also the recommendation in paragraph 30 below.**

Around 15% of the security staff in the Detention Centre are fluent in English.

All interviewers and staff in the Combating Illegal Migration Unit are proficient in English.

Employees attend also additional language courses. In 2024, two employees of SHTAF – Busmantsi attended language courses – level B1 in English and level A1 in Turkish; two employees of SHTAF – Lyubimets attended A2-B1 level English language. In 2025, two employees have completed an online course in English - terminology before return - level B2, organised by Frontex.

Continuous efforts are made to increase the language capacity of the staff. When recruited, speakers of rare languages are given priority over others, other conditions being equal.

#### **Paragraph 30**

At both SHTAFs (and at the SAR Closed Unit), access to interpretation had remained inadequate and limited (as a rule) to interpretation during interviews by the case officers. No interpretation was available in daily life situations including medical and psychological consultations, which had an obvious negative impact on the quality of care. **The CPT calls upon the Bulgarian authorities to remedy this unsatisfactory state of affairs.**

Since mid-May 2025, talks have been held with the Rector of University “St. Kliment Ohridski” that students studying rare languages be involved in practical internships at SHTAF – Busmantsi with the aim to providing interpretation in everyday situations (including medical and psychological consultations). The idea was received positively by the institution.

Given the specificities of the activity and the special access arrangements, the parameters of this interaction are currently being specified.

For the purposes of providing translations/interpretation for the proceedings under the ARA, SAR has concluded a Framework Agreement with two translation agencies. The social experts of SAR regularly visit the persons accommodated in the SAR Closed Unit in Busmantsi and communicate with them in the presence of an interpreter. A Support plan was concluded at the end of 2024 between SAR and the European Union Agency for Asylum, in order to provide interpretation for the persons accommodated in the SAR Closed Unit in Busmantsi. It is expected that this additional opportunity to provide translations will significantly improve the daily life of the asylum seekers.

In addition, the medical person provided by SAR, who performs the examinations of the asylum seekers, also speaks Arabic, which significantly aids communication in establishing the health status of a specific foreigner.

#### **Paragraph 31**

**The Committee reiterates its recommendation that steps be taken to improve access to information to foreign nationals detained at the SHTAF in Busmantsi and at the SAR Closed Unit. In particular, detainees should systematically receive a written translation in a language they understand of decisions regarding their detention/removal, and of the information on modalities and deadlines for appealing against such decisions.**

“Migration” Directorate has signed a contract to provide rare language translation services. Qualified interpreters are involved in all administrative procedures for return purposes, as well as in the provision of specialized medical care/consultations in hospital settings.

With the help of videos the SHTAFs in Busmantsi and Lyubimets aligned their practices as regards communication with inmates. A video from the SAR has been also received and is projected on monitors in the common rooms.

A statement of rights (declaration), translated into different languages, including the right to free legal aid, is provided on arrival. Each foreigner shall complete the declaration in a language he/she understands and sign it personally.

State Agency for Refugees also strictly complies with the regulations of European and national legislation in the field of information provision to the applicants for international protection. All stages of the proceeding for international protection under the ARA are carried out in the presence of an interpreter in a language understandable to the foreigner. All persons seeking protection are provided with written information about the procedure under ARA as well as contacts of organisations offering legal aid and consultations of a legal and other nature. Each decision is provided in person to the applicant or to his representative in the presence of interpreter.

The decisions are read out to the foreigner, and the provision of a copy of the decision is a mandatory element of the information procedure. In each decision of SAR, which is subject to

judicial control, both the procedure and the deadlines for appeal are described. According to Art. 29a of ARA, a foreigner or their representative has the right to submit a request for access to the collected information, on the basis of which a decision will be made on the submitted application for protection.

### **Paragraph 32**

**The CPT calls upon the Bulgarian authorities to extend the State system of free legal aid (run by the National Legal Aid Bureau) to detained foreign nationals, in all phases of the procedure.**

**Pending this, efforts must be made to improve access to the legal aid provided by NGOs for foreign nationals detained at the SHTAF in Busmantsi (and at the SAR Closed Unit).**

Based on a signed agreement with Migration Directorate, BHC teams hold meetings once a week in the two SHTAFs, provide consultation to newly accommodated foreigners and assist them in applying for international protection.

Upon admission to SHTAF, each newly accommodated foreigner receives from the accommodation officer verbal and written information in a language he/she understands about the rules in force in the home, the possibility of obtaining free legal aid under the terms and conditions stipulated in the Legal Aid Act, the established routines, access to medical and psychological assistance, opportunities for contact with international and non-governmental organizations.

The accommodating police authority shall inform the foreigner of the possibility to inform a close associate or relative of his/her detention and to contact a diplomatic mission of his/her country. The provision of the above information shall be certified by signing of a statement (declaration) by the accommodated foreigner and the official, which shall be translated into different languages.

During the initial interview the police inspectors (interviewers) inform the accommodated foreigners again about their basic rights and obligations during their stay at SHTAF, as well as about the possibilities for their realization. The police authorities involved in the organisation and implementation of the return/expulsion decision periodically hold talks with the accommodated so as to inform them about their legal situation, the course of the return procedure or carry out actions to encourage their voluntary return.

Excerpts from the rules of procedure of SHTAF translated into various rare languages with the assistance of UNHCR, are posted in visible places so that foreigners can access the information at a later stage. It was ordered that the copies be checked periodically for replacement in case of deterioration or tearing. The contact details of various international and non-governmental organisations working in the field of migration and human rights protection are also posted in public places.

Foreigners are provided with free legal assistance and translation services by NGOs who visit the special homes on a weekly basis, in accordance with signed agreements and memoranda with the Migration Directorate.

Every accommodated foreigner has the right to meet with lawyers, relatives, close associate and official representatives of the relevant diplomatic and/or consular missions, representatives of NGOs.

Free legal aid shall be provided by the State, in accordance with the terms and conditions stipulated in the Legal Aid Act, provided that the persons concerned do not have the financial means to provide it. It shall be provided irrespective of the financial situation of the foreigner in the cases where it is mandatory by virtue of a law. Its scope includes consultation with a view to reaching an agreement before initiating legal proceedings or bringing a case, preparation of documents for bringing a case and legal representation.

In the framework of court proceedings against imposed coercive administrative measures, at the request of the person and considering the lack of financial means, the court may appoint an ex officio legal representative. The information boards in the hearing room shall contain information on the names and telephone numbers of ex officio public defenders.

Free legal assistance is also provided by representatives of various NGOs and international organizations – BHC, Voice in Bulgaria, Access to Rights Foundation, IOM and UNHCR, within the framework of projects implemented by them.

The people accommodated in SHTAF can also use freelance lawyers who they hire independently and of their own choice.

Contact details of various international and non-governmental organizations working in the field of migration and human rights protection are placed in publicly accessible and visible places.

A list of freelance lawyers registered with the Bar Association has been made available in SHTAF - Busmantsi as of 01.06.2025. However, the number of people willing to hire a lawyer is still very low (less than 1%).

### **Paragraph 33**

**The Committee recommends that the Bulgarian authorities increase the visiting entitlement for foreign nationals detained at the SHTAFs in Busmantsi and Lyubimets (and at the SAR Closed Unit) to at least the equivalent of one hour per week. Further, save duly motivated exceptional circumstances based on an individual risk assessment, visits should be unsupervised.**

According to the SHTAF Rules of Procedure, foreigners are entitled to visits with their relatives twice a week for up to 30 minutes, i.e. one hour a week.

The management of the “Migration” Directorate discussed with the heads of the two detention centres the practical possibilities to increase the visiting time in a way that would not interfere with the regular activities of the homes.

As a result, it is foreseen that starting from 01.07.2025 the visiting time at SHTAFs will be doubled by introducing additional two hours on Tuesday and Thursday mornings.

All visits with outsiders shall be supervised by CCTV or by physical surveillance by a police officer positioned at a sufficient distance from the persons being met, so as to ensure the necessary privacy and confidentiality of communication.

Meetings with a lawyer shall be conducted in confidence, without the presence of a police officer in the room. Surveillance shall be by CCTV or from an adjacent room through a transparent partition.

Direct surveillance shall be applied in order to prevent the risk of unauthorised items being brought in and to maintain order and security in the home.

The possibility of not having police officers present during the visits is gradually increased depending on the risk analysis.

According to Art. 45e of the ARA, asylum seekers accommodated in the SAR Closed Unit in Busmantsi have the right to visits from members of their families and meetings with persons providing legal assistance and representation and representatives of non-profit legal entities and international organisations. SAR does not restrict the right to visits at any stage of the procedure. The Agency has not received any complaints from persons accommodated in the SAR Closed Unit in Busmantsi or their representatives/visitors that their right to visit has been violated.

#### **Paragraph 34**

**The Committee reiterates its recommendation that the Bulgarian authorities allow detained foreign nationals to use the VoIP technologies and unrestricted wi-fi on a free-of-charge basis to communicate with the outside world.**

The SHTAF – Lyubimets has unlimited wireless internet access. Every foreigner can use his own mobile device with a camera twice a week under surveillance. All devices without a camera can be used freely throughout the stay, having a permanent connection to the internet.

In the absence of a personal mobile device and if the accommodated foreigners so wish, they have access to a computer with internet so as to contact relatives and friends or seek legal assistance. It is also possible for the accommodated persons to be provided with a mobile phone, including by a representative of the BRC during regular visits to the SHTAFs.

Foreigners accommodated in SHTAF – Busmantsi may use their own mobile devices without cameras at all times, but they provide their own access to the Internet. The mobile devices with cameras are kept by the interviewers and can be used in their presence upon request of the foreigner. Foreigners who do not have personal mobile devices may make phone calls from a SHTAF's phone following a request before an interviewer. Computer with internet access may be used for communication with relatives or for obtaining documents and papers.

Three workstations have Internet access in the computer room. Providing wireless internet in the common premises is under consideration.

#### **Paragraph 36**

**The CPT reiterates its recommendation that the Bulgarian authorities review the operation of the complaints procedures at the SHTAFs in Busmantsi and Lyubimets (and the SAR Closed Unit) so as to make sure that detained foreign nationals are effectively enabled to send complaints in a confidential manner. The Committee also reiterates its**

**recommendation that statistics on the types of internal complaints be kept as an indicator to the management of areas of discontent within the establishments.**

In order to ensure full discretion and confidentiality, the complaints boxes have been moved to the corridor, next to the sleeping rooms of the accommodated foreigners in SHTAF – Busmantsi.

There is one box installed in an accessible place in the administrative building of Lyubimets SHTAF, as well as several boxes in the corridors of the dormitories and in the van settlement, placed at a distance from the police posts in order to guarantee the anonymity of the submitters.

The boxes are opened daily by a member of the designated committee of SHTAF.

Foreigners use the boxes to submit requests on specific issues, mostly of a domestic nature, which in fact are not complaints. Each written submission, regardless of its nature, is registered in the record keeping systems, after which it is reported to SHTAF's management for follow-up.

No reports of police abuse over the accommodated foreigners have been received since the procedure was introduced.

Complaints from foreigners accommodated in the SAR Closed Unit in Busmantsi are extremely rare. Every foreigner has the full right to file a complaint against the conditions in the accommodation facility and/or ill treatment. In the event that such a complaint is received, the necessary checks are carried out and the relevant measures are taken in relation to the situation with a view to eliminating the dissatisfaction indicated therein. Competent SAR employees make regular visits to the SAR Closed Unit in Busmantsi, during which problems of any nature can be discussed, including the concerns of persons seeking protection regarding the conditions of accommodation or the treatment of them by officials.

Both SHTAFs and the territorial units of SAR, including the Closed Unit in Busmantsi, are regularly monitored by the Bulgarian Helsinki Committee.

The institutions receive feedback on the findings of the inspections and the observed practice with a view to taking timely measures.

**In addition to the concrete measures on the recommendations,** taking into account the important messages in all the reports of the CPT, as well as the Roadmap on the implementation of the judgments against Bulgaria by the European Court of Human Rights, the leadership of the Permanent Working Group on Human Rights took the initiative to establish a working group of representatives of the competent structures of the Ministry of Interior and the Ministry of Justice.

The group should analyse in depth all aspects of issues related to police violence, including the need for rules on the collection of data on complaints and the outcome of investigations into them, and the introduction of a clear, objective and independent mechanism for investigating police violence. If needed, NGOs' representatives will also be consulted.

It is expected that by the end of 2025 the group will make concrete proposals for a new bylaw framework to achieve sustainable and positive change in practices.

Any new information on the above issues will be duly brought to the attention of the CPT.





## LIST OF ABBREVIATIONS USED IN THE INFORMATION

Abbreviation	Full form
ARA	Asylum and Refugees Act
BPSs	Border Police Stations
BRC	Bulgarian Red Cross
CPT	European Committee for the Prevention of Torture, Inhuman or Degrading Treatment or Punishment
DGBP	Directorate General “Border Police”
DGGSOCT	Directorate General “Gendarmerie, Special Operations and Combatting Terrorism”
DGNP	Directorate General “National Police”
IP	Institute of Psychology
MoD	Ministry of Defence
MoI	Ministry of Interior
RDBP	Regional Directorate “Border Police”
SAR	State Agency for Refugees
SHTAF	Special Homes for Temporary Accommodation of Foreigners
TDF	Temporary Detention Facility