The **BULGARIAN HELSINKI COMMITTEE** (BHC) is an independent non-governmental organisation for the protection of human rights: civil, political, economic, social, and cultural. It was established on 14 July 1992. In our work we place a special priority on protection of the rights of the most vulnerable groups in Bulgaria: ethnic minorities, underprivileged groups, persons deprived of their liberty, people in institutions, children, women.

The BHC objectives are to promote respect and support the protection of human rights, to lobby for bringing Bulgarian legislation in line with international standards, to promote public debate on human rights issues and popularize the human rights cause among the public at large.

The BHC is registered as a non-profit association in the public benefit, certificate No. 001/12.07.2001.

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MONITORING AND RESEARCH PROGRAMME

In 2022, the Monitoring and Research Programme monitored the human rights situation in Bulgaria in the key areas formulated in the BHC 2018-2023 Strategy: excessive use of force by law enforcement officials, discrimination on several grounds, the situation of the Roma, gender-based violence and domestic violence, the rights of people with mental disorders, prisoners’ rights, rights of the child, minority rights, freedom of association.

The main types of activities the programme engaged in included monitoring of the human rights situation in Bulgaria, work on projects in priority spheres, advocacy, strategic litigation before the ECtHR and in the procedure for implementation of the Court’s judgments. Parallel to this, the programme took part in the procedure of extraditions of Bulgarian nationals from the United Kingdom, which contributed to BHC monitoring activities in closed institutions.

MONITORING OF THE HUMAN RIGHTS SITUATION IN BULGARIA

The Monitoring and Research Programme monitors all materials related to human rights in Bulgaria of local and international observers. It cooperates with organizations engaged in similar activity on a regular basis and draws on their observations and expertise. Along with this, the programme carries out targeted monitoring in various spheres to obtain first-hand information about the state of human rights in them.

In 2022, the programme conducted monitoring of six facilities for children and youth with disabilities. The results of this monitoring, together with the data collected under the Access to Public Information Act (APIA), fed into the annual report on the state of human rights in Bulgaria in 2023, as well as advocacy activities.

In 2022, BHC continued its monitoring of places of deprivation of liberty. Researchers carried out monitoring visits in half of the country’s prisons. Information on the conditions in these institutions was obtained also from correspondence with prisoners and from the official information requested under the APIA. During the year, the report "Inpatient Healthcare in the Prisons in Bulgaria" was published; it presents the results of a study on hospital care in the penitentiary system with a focus on the structure and activity of the hospital at the prison in Sofia between 2015 and 2021.

Starting in August 2022, the programme started performing a systematic investigation of human rights in the Russian Federation prompted by several extradition requests from the Russian authorities. At the invitation of courts in Varna, Burgas and Sofia, the BHC presented reports on human rights and the rule of law in the Russian Federation in proceedings before these courts. The programme produced five reports. In all cases the extraditions were refused and the courts referred to the BHC reports in their decisions.

Assessment of the reform in places of detention: Legislation and practice after the pilot judgement of the ECtHR Neshkov v. Bulgaria

The project financed by the Active Citizens Bulgaria Fund is aimed at improving the implementation of international human rights standards in the penitentiary sphere in Bulgaria. In 2022, four follow up monitoring visits were made to places of deprivation of liberty. A report is due to be published in 2023.

Two national advocacy events were held. The first was with representatives of the National Preventive Mechanism to discuss the findings of the BHC about the prison in Pleven, working conditions and access to medical care in places of deprivation of liberty. The second event, with representatives of the Ministry of Justice, discussed the BHC’s findings from the monitoring in prisons and detention centres in 2021-2022. After the appointment of an interim cabinet in 2022, the BHC sent the new Minister of Justice a letter in order to familiarize him with the current problems in places of deprivation of liberty through the prism of our field observations. We also sent a report about the irregularities in the formulation of a public order for the construction of a telephone system for prisoners.

Prompted by a BHC report, in 2022 the State Labour Inspectorate carried out inspections in production workshops, farms and workshops belonging to the Prison Work Fund at almost all prisons in the country and found over 100 violations of the regulations for safe and healthy working conditions.

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The programme maintains the website www.prisonreform.bg and the "Prison Reform" page on social networks; several materials related to prison reform were published. In the past year, the site had 24,000 visits, of which 14,000 were from unique users.

Piloting equality data collection related to equal treatment in the EU criminal justice systems

The EQUALITYDATA Project started in November 2020 as a joint initiative of five non-governmental organizations from Belgium, Bulgaria, Greece, and Romania. Its main objective was to pilot the systematic collection of data on the different treatment of persons belonging to vulnerable groups in the criminal justice systems of the EU Member States and to gather evidence in support of this. The project is co-financed by the European Union. In 2021, a field study was carried out among prisoners resulting in a representative sample of 1,010 recently convicted and sentenced individuals whose pre-trial proceedings began after July 2019. In 2022, the report "Problems with equal treatment of accused persons in pre-trial proceedings in Bulgaria" was published of the accused and the defendants in the pre-trial proceedings in Bulgaria.2

In March, a series of advocacy activities were undertaken - meetings with the Ministry of Justice, the Directorate General for the Execution of Sentences, the Ministry of the Interior, the Prosecutor

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General, the National Statistical Institute. In September, the programme took part in advocacy activities at the European Parliament in connection with the findings of the study, and in October organized a seminar with Bulgarian lawyers on the topic.

**Human Rights Guide**

In 2022, BHC started work on a new two-year project with the Baltic Society for Human Rights (Latvia) on the expansion of an online human rights guide ([http://www.humanrightsguide.bg/bg/temi/](http://www.humanrightsguide.bg/bg/temi/)). The new topics are rights of refugees and migrants and the detention of refugees and migrants. They were developed in Bulgarian and in English, and in 2023 they will be uploaded to the website of the management.

The guide already contains accessible information on the right to freedom of expression and the media; the right of access to a court and to a fair trial; rights during arrest and detention; the rights of prisoners in places of deprivation of liberty; the rights of persons admitted for forced and compulsory psychiatric treatment; protection against discrimination; domestic violence protection and hate crime protection. In 2022, the handbook became a sought-after resource for training on human rights in Bulgaria, as well as for supporting the activities of legal practitioners.

**Study on the rights of people with disabilities**

In 2022, BHC continued its cooperation with Human European Consultancy to conduct a research on the rights of people with disabilities commissioned by the European Commission. In 2022, the programme produced three studies of legislation, policy and implementation practice:

- on the incentives for employers providing employment to people with disabilities;
- on the state of employment, education and social services rights of people with disabilities in 2022;
- on the right to an independent life for people with disabilities.

In December, the **updating of the European Commission’s DOTCOM** database for Bulgaria began, which reflects the current state of national legislation, policies and practice regarding the rights of persons with disabilities, as they are regulated in the UN Convention on the Rights of Persons with Disabilities. In May 2022, a round table was organized at the psychiatric hospital in the town of Kurilo.

**Between Integration and Re-Integration**

At the end of 2021, BHC started work on the project "**Between Integration and Reintegration**", supported by the EU. It is implemented in Bulgaria, Italy, and Romania under the general coordination of the University of Florence. The project focuses on a poorly researched area - the reintegration of Roma prisoners after serving their sentences. Its main goal is to collect data on how the process of reintegration of former inmates is going, to study attitudes and expectations about life in freedom and to identify the best practices for more effective reintegration.

In Bulgaria, the study follows the post-release journey of 30 imprisoned Roma men and women, documenting their experiences in the first six months after their release. With the cooperation of the prison administrations, the project was presented in the prisons in Bobov Dol, Sofia, Pazardzhik, and Sliven. The programme wrote a **paper on the domestic standards and policies for resocialization**. An ethnographic study is being prepared that will present the information collected during the research activity of the resocialization of offenders. Findings will be presented on a website, at research conferences and in scientific papers.
**PRISONCIVILACT Project**

In 2022, the Monitoring and Research Programme worked on the PRISON CIVIL ACT project of the European Prison Litigation Network. The project is supported by international donors and takes place in several European countries. The project included the preparation of information on the development of judicial practice in Bulgaria related to prisons and the preparation of two reports - on the European recommendations to Bulgaria in relation to prison reform and a review of the literature on the influence of European judicial practice on solving structural problems with conditions of imprisonment.

**PUBLIC ADVOCACY THROUGH THE MEDIA, PARTICIPATION IN PUBLIC EVENTS, MEETINGS AND WORKING GROUPS**

During the year, the media appearances of representatives of the programme were concentrated around several events: the 2021 annual report on human rights in Bulgaria, the 30th anniversary of the BHC, the extradition of persons at the request of Russia, the “Human of the Year” awards, violence against women and the October 2022 ECtHR decision in the Paketova and Others v. Bulgaria. Among the media in which our messages received the greatest response were the Bulgarian National Radio, Dnevnik, Capital, BTV, Free Europe, Sega, Marginalia, Darik, Mediapool.bg and others.

**STRATEGIC LITIGATION AT ECTHR, BEFORE THE CONSTITUTIONAL COURT AND IN THE PROCEDURE FOR IMPLEMENTATION OF JUDGMENTS**

In 2022, the Monitoring and Research Programme participated in the submission of seven complaints to the European Court of Human Rights (ECtHR) in Strasbourg. These include the violation of the rights of association and peaceful assembly of Macedonians in Bulgaria and the ban on voting of prisoners from several prisons. The programme also participated in the presentation of an submission on an ongoing case filed in previous years.

Three submissions were also presented to the Committee of Ministers of the Council of Europe on review of the implementation of ECtHR decisions. Two of them are on the right to freedom of association, and one concerns healthcare in Bulgarian prisons. These submissions were taken into account by the Committee of Ministers. The enhanced observation on any of the groups of cases where the programme sent observations was not terminated in 2022.

In March, the programme sent an appeal to the Ombudsman regarding the conduct of the proceedings on placement of mandatory treatment under the Health Act via video conference. In July, the Ombudsman submitted a request to the Constitutional Court to declare the provision unconstitutional. BHC prepared an opinion to the Constitutional Court in which it supported the request. By a decision of 17 November 2022, the provision of the Health Act enabling the placement of mandatory treatment with a hearing via video conference, was declared unconstitutional.
LEGAL DEFENCE PROGRAMME

The BHC Legal Defence Programme (LDP) is engaged in strategic litigation and legal advocacy. The programme brings cases before the Bulgarian and international judicial and quasi-judicial bodies. Legal advocacy is carried out through opinions on interpretive and constitutional cases at the invitation of the Supreme Courts and the Constitutional Court, opinions on cases before the European Court of Human Rights (ECtHR) and the Committee of Ministers at the Council of Europe on the execution of ECtHR judgements in relation to Bulgaria, participation in working groups for the preparation of draft acts and opinions on draft acts before the National Assembly, and public consultations on by-laws. The programme’s legal experts carry out legal consultations, studies and participate in conferences and seminars as speakers.

DOMESTIC LITIGATION

In 2022, the BHC Legal Defence Programme continued engaging in strategic litigation and other cases before the Bulgarian courts, the Commission for the Protection of Discrimination and the European Court of Human Rights (ECtHR). Although our main focus continues to be on strategic human rights litigation, in 2022 BHC participated in advocacy by submitting positions on draft legislation, participation in the process of implementation of judgements of the ECtHR. By submitting the relevant information for the Committee of Ministers at the Council of Europe the BHC addressed several long-standings domestic problems – the enormous number of people without identity documents, the lack of control and accountability of the Chief Prosecutor and the Prosecution.

During the year, the programme worked on at least 68 proceedings:

- 13 proceedings under the Protection from Discrimination Act, of which seven new;
- 39 proceedings before the court, of which 17 new;
- Seven pre-trial proceedings, of which 4 new;
- 15 applications before the European Court of Human Rights of which 4 newly filed applications. Two judgments were delivered during the year.

LDP worked on several projects. In collaboration with BOLD Foundation and the Open Society Foundations, LDP implemented a project for vaccination justice in Bulgaria. It also works in the implementation of the FLIGHTRISK Project, coordinated by Fair Trials Europe, which investigates the conditions for the imposition of the most severe measure of non-refoulement - detention under custody. The programme participated in the drafting of an international report on the regulation of political advertising in the EU in implementation of the project on the rights-protected network Union for Civil Liberties for Europe (Liberties), which aims to establish how the political advertising market is regulated in five EU states.

A case from 2019 before the Equality Body regarding the statement of the deputy prime minister Krassimir Karakachanov in Voyvodino village achieved a breakthrough when the Supreme Court returned the case to the Equality Body for a new ruling toward establishing ethnic discrimination.
Protection from discrimination cases

BHC uses both methods provided by the Protection Against Discrimination Act – proceedings before the civil courts and before the Commission for Protection against Discrimination. The focus is on cases of discrimination on the sixth main grounds in the anti-discrimination directive on the EU.

Cases on grounds of ethnicity/race and religion
- A case from 2019 before the Commission for Protection against Discrimination in connection with the statement of deputy prime minister Krassimir Karakachanov in Voyvodinovo village achieved a breakthrough when the Supreme Court returned it to the equality body for a new ruling in the direction of establishing ethnic discrimination.
- In 2022, the proceedings before the Equality Body concerning the 2019 events in Voyvodinovo village finished. LDP provides legal assistance to a number of persons of Romani origin who were forced to leave the village. The applicants claimed that the actions of the village mayor and the director of the police were discriminatory. The Equality Body found the mayor guilty of discrimination. The decision is final.
- During the year the programme provided procedural representation and in a number of other proceedings, still ongoing, concerning publications on the site of the VMRO, denial of access to public services, discriminatory actions of the prison administration.

Cases on the grounds of disability
- LDP provided representation to a boy with a disability in his complaint against the former deputy prime minister Valery Simeonov and his statements against the mothers of children with special needs.
- In 2022, the programme engaged in litigation against the former health minister Angelov in connection with organisation of the vaccination process against COVID-19.

Cases on the grounds of sex and sexual orientation
- In July, a ruling was delivered on a complaint to Trud daily in connection with a decision of the Equality Body that had established discrimination on the basis of sexual orientation. The Court confirmed the decision on the equality body. The decision has been appealed.

Cases on other grounds
- Ekaterina Chupova - two cases related to the denial of one-time aid to students, enrolled in first and eighth grade, who have been granted refugee status.

Cases of individuals who come under attack on account of human rights work
- During the year LDP continued to defend an applicant who had been ordered by the first instance court to pay compensation to the National Association “Initiative for the Family” for her position regarding the interference and influence of two NGOs – the said association and the Association “Community and Values” that resulted in the failed adoption of the Strategy on the Rights of the Child. LDP appealed the decision before the court, which reduced the compensation.
- Work was carried out in connection with a prosecutor file started in connection with threats at a 2014 rally in front of the BHC office. An application was filed before the ECtHR due to an inadequately conducted investigation.

Cases on behalf of victims of bias motivated crimes
- LDP continued to provide assistance to a victim of a hate crime that took place in 2018. The victim was assaulted by the police.
LDP is also representing a victim of colour who was hit with a bottle in the face while shopping in a store in the Sofia; another victims of a bias motivated attack in the Sofia by football hooligans; a man who has received threats after expressing support for the LGBTI community.

LDP is providing representation to a minor of Romani origin who is a victim of a bias motivated attack. The LDP appealed the prosecutor’s decision to not initiate pre-trial proceedings.

LDP also provided procedural representation to a person with special needs who was sexually assaulted during treatment in a hospital.

Cases for protection from homelessness

LDP continued to provide legal assistance to A.V., A.M. and B.D. - all of them of Romani origin - in registering them for municipal housing. After a series of cases, in 2022 the three families were included in the waiting lists for municipal housing, but two cases against the order of these lists remain pending. In the meantime, due to the deleted permanent address, they cannot obtain identity documents. In connection with this, three cases related to address registration were filed, which were won in 2022.

During the reporting period, two cases were won at first instance against the refusals of the Ministry of Internal Affairs to issue identity cards to three individuals.

During the year, LDP finally won in the Court of Appeal the case of the young man from Batalova Vodenitsa, the son of an applicant in Yordanova and Others v. Bulgaria, for nullity of the refusal of the mayor of the Vazrazhdane district to register him as living at the address.

Other domestic proceedings

LDP won the case of a Hungarian national who was raped by the so called "Valium Rapist". The case was filed on account of illegal dissemination in the media of photographs of the injuries on the victim’s body that had been provided to the authorities in connection with the criminal charges against the attacker.

LDP is representing an Iraqi national - a victim of domestic violence – in proceedings aimed to restore contact with her two children who are Bulgarian nationals.

LDP is also representing a woman who was deprived of the opportunity to vote in the April 2021 elections on account of being under Covid-19 quarantine; she was not provided with a mobile ballot box. The case is at the Supreme Administrative Court.

LDP started a lawsuit against the Prosecutor General requesting that he starts publishing his acts in a methodical manner as prescribed by law.

LDP challenged the text of an order of the Chairman of the State Agency for National Security, which serves as a basis for denying information about whether the person is the subject of inspections or wiretapping by the SANS.

LDP started providing representation in the case of a adult with a developmental disability who went missing from a social care institution and the insufficient efforts of the authorities to find him.

During the reporting period, the PPZ worked on a case of the Association "Civil Association for the Protection of Basic Individual Human Rights" in connection with a request submitted by the prosecutor’s office for its termination.
Access to Information Act

LDP won a number of cases during the year in connection with refusals to provide access to public information. In 2022, the Sofia City Administrative Court overturned eight refusals to provide access to public information relating to:

- the refusal of Prosecutor General to give access to ECtHR case-law analysis relating to the work of the Prosecution;
- the refusal of Prosecutor General to give access to information on the total amount of compensations paid out by the prosecution in cases relating to its work;
- refusals of the Prosecutor General to provide information on alleged corruption in the system/raids on “household criminality”;
- refusals of the Minister of Justice to provide reports on checks in the prison system, information on people without valid addresses;
- refusal of the Commission for Protection from Discrimination to provide information of its decisions delivered in 2021 that have not been enforced.

INTERNATIONAL LITIGATION

In 2022, LDP was representing applicants in 15 applications before the European Court of Human Rights – 4 of which new, and in one application before the Human Rights Committee.

- LDP filed an application with the ECtHR regarding the impossibility of a girl to practice football in her home city upon turning 16, because of her sex.
- LDP filed an application in connection with the collection of information about the personal life of individuals by SANS and the impossibility to verify whether data is collected and processed for legal entities.
- Another application filed by LDP concerns a mother and daughter diagnosed with autism who complain of a violation of their right to privacy because, without their valid consent, the child was filmed and broadcast in a video.

ECtHR delivered its judgments on Y and Others v. Bulgaria relating to the murder of a woman victim of domestic violence; the court found a violation of Article 2 (right to life). A judgment was delivered in Y.P. c. Bulgarie; ECtHR established that the Bulgarian authorities had not investigated effectively a sexual assault against a minor. The Court found a violation of Articles 3 and 8.

The Programme continued to work on the complaint to the Human Rights Committee on behalf of Sayde Mehmed; the complaint concerns the right to freedom of religion and the right to publicly express it (attendance of school with a headscarf).

ADVOCACY

In April, LDP submitted to the Committee of Ministers a submission on the implementation of the judgments of the ECtHR on the group of cases Kolevi v. Bulgaria; the group concerns the lack of a mechanism for independent investigation of the Prosecutor General.

In June, the programme sent a submission on the implementation of another key case of the ECtHR – Yordanova and Others v. Bulgaria in connection with demolition of illegal buildings of a Romani community whom these were their only homes.
The programme issued positions on a number of draft acts – amendments in the Bulgarian ID Documents Act; Protection Against Domestic Violence Act; Voting Act.

LDP took part in the working group at the Ministry of Justice that discussed the amendments of the Code of Criminal Procedure and the Judiciary Act in connection with the implementation of Kolevi v. Bulgaria. The programme is also taking part in a working group set up at the National Alliance for Children in the area of juvenile justice.

In March, the human rights network Civil Liberties Union for Europe published a report on Bulgaria following the consultation of the European Commission on the rule of law in the member states. The part about Bulgaria was prepared by LDP together with the Association of European Journalists.

LDP also took part in consultations of the European Commission, the Venice Commission, GRECO (the group of countries for the fight against corruption of the Council of Europe).

In 2022, LDP sent open letters to institutions - regarding the initiative of the Prosecutor General to speak to students; regarding the practice of the Ministry of the Interior to refuse to issue identity cards to citizens mainly of Roma origin; regarding actions to obstruct an action in support of Ukraine in front of the Monument to the Soviet Army; regarding a request for the resignation of a member of the SJC for inadmissible statements towards the BHC; letter to the SJC with questions about the annual report of the Prosecutor’s Office; a letter to the Minister of Health requesting an amendment to the vaccination plan against COVID-19; to the Minister of Justice with abundant information about the work of the Attorney General, proving his unfitness to hold this position.

SEMINARS AND TRAININGS

The programme participated in a conference on hate speech organized by the Association of European Journalists, Shalom, Bilitis and Glas Bulgaria, where it presented the work of the BHC on the key ECtHR cases Behar and Gutman/Budinova and Chaprazov at a conference organized by the Organization for Security and Cooperation in Europe dedicated to combating hate speech.

LEGAL ADVICE AND COMPLAINTS TO BHC

LDP provides legal assistance not only in the form of legal representation for cases of strategic importance, but also in the form of legal advice to persons who have submitted letters of request or signals to the organization. In 2022, the organization received 235 requests for legal assistance and reports of irregularities. Over 43 applications were considered.

REFUGEES’ AND MIGRANTS LEGAL PROTECTION PROGRAMME

In 2022, the BHC specialized legal programme for the protection of refugees and migrants continued its work, which began 25 years ago with the support of the United Nations High Commissioner for Refugees. In 2016 this activity started being supported also by UNICEF with a focus on the protection of unaccompanied migrant children. The activities include monitoring and assessment of the practice for granting international protection and status on the territory of
Bulgaria, border monitoring and monitoring of the administrative centres for the detention of foreigners regarding access to territory and procedure, strategic cases before the national courts, as well as monitoring and advocacy for the protection of unaccompanied children and their protection from unlawful detention. The activities of the programme are aimed at the creation of legal standards for the protection of refugees and respect for the basic rights of migrants, as well as advocacy and lobbying for the creation of legal and practical guarantees in the legislation for the protection of the basic human rights of foreigners of all categories on the territory of Bulgaria.

The programme carries out its activities based on several permanent institutional agreements with the United Nations High Commissioner for Refugees (since 1994), with the State Agency for Refugees (since 1998), the Border Police Directorate at the Ministry of Internal Affairs (since 2005), the Migration Directorate at the Ministry of the Interior (since 2007) and with the National Legal Aid Bureau (since 2017). The programme represents the BHC in the Bulgarian Refugee Council, established as an organization of BHC, Caritas and BHC in 2005 with the aim of coordination, lobbying and advocacy to strengthen the national asylum and protection system. The programme carries out its activity of providing legal consultations, interventions, and representation before the administration through the permanent reception desks in Sofia and Svilengrad and through legal reception centres in the registration and reception centres at the State Agency for Refugees.

BORDER MONITORING, LEGAL AID

Continuous border monitoring was carried out at the places of police detention at the entry border between Bulgaria and Turkey at the Kapitan Andreevo border crossing, the Novo Selo border crossing, the Elhovo border crossing, the Bolyarovo border crossing, the Sredets border crossing, the Malko Tarnovo border crossing and the Aerogara border crossing - Sofia. The main exit borders with Serbia and the Republic of North Macedonia were also monitored regularly and ad hoc. The special homes for temporary accommodation of foreigners in the SDVNCH - Sofia, "Busmantsi" quarter and the SDVNCH - Lyubimets under the Directorate "Migration" of the Ministry of Internal Affairs were monitored on a weekly basis. The program provided appeals against the acts of the administration and access to the courts for asylum seekers and other migrants as legal assistance to realize their right to an effective remedy, as well as pro bono representation before the regional administrative courts and the Supreme Administrative Court in cases of serious violations of substantive or procedural rights.

During the year, to comply with the principle of non-refoulement under Art. 33 of the Geneva Convention, the programme carried out 529 border visits and provided legal assistance for the submission of an application for land border protection and access to the territory of 4,233 asylum seekers at the border. Since 2021 the programme has been monitoring ongoing readmission proceedings; in 2022 it audited 324 readmission proceedings of third-country nationals with a focus on preventing the return of Turkish nationals seeking protection.

Continuous border monitoring was carried out at the places of police detention at the entry border between Bulgaria and Turkey at the border crossings at Kapitan Andreevo, Novo Selo, Elhovo, Bolyarovo, Sredets, Malko Tarnovo, and Sofia Airport. The main exit borders with Serbia and the Republic of North Macedonia were monitored regularly and ad hoc. The special facilities for temporary accommodation of foreigners in Sofia and Lyubimets were monitored on a weekly basis. The programme appealed administrative acts and ensured access to the courts for asylum seekers and other migrants so that they had access to an effective remedy; the programme also ensured pro bono representation before the regional administrative courts and the Supreme Administrative Court in cases of serious violations of substantive or procedural rights.
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During the year 5,268 pushbacks were established affecting 87,647 individuals

The programme monitored the Dublin transfers from and to other EU member states at Sofia Airport in order to ensure the right of returned applicants to access proceedings for the assessment of their application on the merits, if they left the country for another EU member state before completing their refugee procedure here. The programme continued to register the cases of pushbacks on land border, mainly along our external border with the Republic of Turkey. Pushbacks are the return to Turkish territory of foreigners who wish to apply for protection through or outside the established official readmission procedures or preventing their entry into Bulgarian territory through official or unofficial non-admission. In 2022, the programme identified 5,268 pushbacks affecting 87,647 individuals.

In the course of the year, the programme monitored the implementation of the principle of access to procedure under Article 6 of the Asylum Procedures Directive regulating common procedures for granting and withdrawing international protection in the so-called special facilities for temporary accommodation of foreigners at the Migration Directorate of the Ministry of Internal Affairs (the facilities in Busmantsi and Lyubimets). The programme carried out 116 visits to these facilities and provided legal assistance for access to procedure to a total of 15,262 asylum seekers in them (4,184 persons transferred from the border and 11,078 persons detained on the territory of Bulgaria); the individuals were assisted in filing protection applications before the immigration police. This year the main difficulty in carrying out this activity arose from the mandatory 10-day medical quarantine imposed on all detained persons, which extended the time between detention and the submission of the asylum application with so many days. However, the programme managed to ensure a relatively short period of detention of an average of 6 calendar days with 0 days average delay compared to the statutory period of 6 working days, as well as to ensure within this period the release and access to the procedure in the open refugee centres for 89% of all asylum seekers detained in the deportation centres of the Ministry of the Interior.

The programme’s offices in Sofia and Harmanli provided consultations on a daily basis. In 2022, 2,644 legal consultations were provided to 2,383 people (for registration and access to a procedure, in connection with the granting of international protection, in connection with the rights and obligations of asylum seekers and persons granted protection, family reunification, acquisition of Bulgarian citizenship and voluntary return).

The programme monitored the proceedings carried out by the State Agency for Refugees in order to ensure compliance with the basic minimum standards for the assessment of the application for protection and for the granting of international protection. Thus, we monitored the procedures for granting status in the registration centres in Sofia, Banya, Harmanli and Pastrogor.

The programme monitored 500 procedural actions in international protection concerning 335 men, 82 women, 14 accompanied children and 69 unaccompanied children. The State Agency for Refugees continued to notify the programme in advance of most of its schedules for the various types
of actions in the proceedings for granting of international protection (registrations, interviews, delivery of decisions), which significantly improved the representativeness of the monitoring. This resulted in the 2022 Annual Monitoring Report on Protection Proceedings, which contains recommendations for improving the standards of asylum proceedings.

LITIGATION

Thirty-five cases were brought before the administrative courts against negative decisions of the State Agency for Refugees in proceedings for the assessment of asylum requests. The main problems arose from the general decline of the independence and objectivity of the national justice system and the deteriorating quality of judicial acts, while in refugee cases a factor is also the discriminatory treatment of certain nationalities whose asylum requests are perceived as clearly unfounded, albeit not for legal, but for purely political reasons.

In 2022, the programme filed 91 strategic cases – 8 cases against exclusion on grounds of national security, 12 cases against discriminatory denial of child benefits to persons granted refugee or humanitarian status, 17 cases against placement in a closed refugee centre and 54 cases against other various violations of substantive or procedural law.

Thus, in 2022 the programme provided legal assistance, representation and consultations to a total of 21,498 beneficiaries, of whom – 15,311 people for access to territory and procedure, 1,177 people in proceedings for granting international protection, 38 asylum seekers with refusals to grant international protection, 61 definitively refused asylum seekers in voluntary return procedures, 324 foreigners in readmission procedures, 104 asylum seekers in strategic cases and 1,107 recognized refugees or persons granted humanitarian status, 3,438 people with temporary protection (including 900 unaccompanied children).

SUPPORT FOR UNACCOMPANIED MIGRANT CHILDREN

With the support of UNICEF, the programme developed and implemented standard operating procedures for informing and counselling unaccompanied children in the process of family reunification. In 2022, 864 unaccompanied children were consulted and/or represented before the administration and courts for their release from police detention centres to ensure access to legal means of reunification with their parents or other family members in various European countries as a means of prevention of children running away and exposing them to the risks associated with the illegal movement and trafficking of human beings. A total of 202 unaccompanied children were monitored in relation to their welfare, another 108 unaccompanied children were interviewed about the quality of their representation by the lawyers from the National Legal Aid Bureau. Information sessions were held with 517 unaccompanied children on the possibilities of reunification with their families under the Dublin III Regulation in order to prevent absconding and the related risks to their lives and security. A total of 47 unaccompanied children received direct assistance to start family reunification procedures.
REPORTS, TRAININGS, TELEPHONE HOTLINE

The programme prepared the traditional specialized reports - the Annual Border Monitoring Report and the Annual Status Monitoring Report,3 which contain recommendations to the government and the relevant state authorities for specific measures, as well as proposals for legislative amendments. The programme also prepared the annual update of the report on Bulgaria published in the AIDA (Asylum Information Database) of the European Council for Refugees and Exiles.

During the year, in cooperation with the Lawyer’s Training Centre of the Supreme Bar Council, the programme conducted three trainings for nearly 300 lawyers on system of temporary protection, and also participated in the organization by the United Nations High Commissioner for Refugees, UNICEF and the Migration Directorate of two trainings for the official lawyers of the National Legal Aid Bureau.

In 2022, a total of 149,268 foreigners were registered for temporary protection in Bulgaria. On March 7 2022, the programme opened a hotline for legal advice to Ukrainian refugees and nationals of other countries with temporary protection. The BHC website and the programme's specialized website asylum.bg provided additional information. A total of 6,138 people received legal advice through the hotlines, and the two sites were visited over 28,000 times. The programme was included in the "blue points" jointly organized by UNHCR and UNICEF in Varna, Burgas and Sofia, where legal and social information and social services are provided to persons who are granted temporary protection. The programme hired and trained three Ukrainian lawyers who worked in the "blue points" and provided legal information to a total of 3,438 persons with temporary protection.

During the year the programme operated through a staff of 21, 10 of which practicing attorneys.

CAMPAIGNS AND COMMUNICATIONS PROGRAMME

In 2022, the unfolding military aggression of Russia in Ukraine and the resulting refugee flow to the EU countries, including Bulgaria, lead to changes in our planning communications work. We prioritised advocacy activities and activities supporting the work of our programme for legal assistance to refugees and migrants to provide accessible information about Ukrainian refugees. The programme managed to maintain a high intensity of public communication and continued work towards improving the image and public perception of the BHC.

In 2022, we published over 82 press releases, opinions, open letters, and news related to the organization's activities in Bulgarian and English. Last year, the BHC official website, www.bghelsinki.org, had over 154,000 unique visits – a 50% increase over the previous year.

CAMPAIGNS

30 Years BHC: Rights for All

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To celebrate the 30th anniversary from the establishment of the BHC we launched a campaign to promote human rights. It’s targets were active young people who are known to more often react against injustices in society, but do not know their rights and the possibilities to defend themselves or the cause they believe in too well. The motto of the campaign "Fighting the rights of one is the key to the rights of all" emphasizes the universality of rights and one of the main principles in the work of human rights defenders: we are all equal in dignity and rights, and fighting for one’s cause is upholding a standard that is valid for every member of society. The aim of the campaign is to fill the stereotypical and abstract concept of "human rights" with concreteness and substance; to answer some basic questions - what are human rights, who needs them, are they the same for everyone and do they give us complete freedom. The team updated with new visuals and content the page of the organization’s website with 17 main topics in the field of human rights explaining in accessible language the different rights and vulnerable groups.

The campaign was promoted through a specially created video⁴ (with 78,000 views from August 2022 until mid-March 2023 on YouTube alone), visuals distributed in partner media and organizations, on social networks and in some of the major cities across the country. The popular actor Ivan Burnev is the face of the campaign, the video is directed by Valeri Milev, and the creative concept was created in partnership with the Brand New Ideas Advertising Agency. The campaign was supported by the online media dnevnik.bg, clubz.bg, mediapool.bg, otgrada.bg, maikomila.bg, marginalia.bg, proud.bg, boyscoutmag.com, vijmag.bg, as well as the marketing agency Dentsu Bulgaria. The video and social media posts had a total of 52,000 impressions. The video was also promoted with paid Google advertising, where it received over 400,000 impressions, over 1,400 clicks and a 20% view rate.

As part of the campaign, together with the Brand New Ideas agency we organised a social experiment. As an allegory of discrimination, during the music festival REBEL REBEL Vol. 2 an actor posing as a bartender at the festival arbitrarily refused to sell beer or other drinks to visitors citing various personal characteristics. In response to their objections and complaints, customers were directed to a special BHC stand, where they received information about discrimination and human rights, as well as information on what the BHC does. We recorded the ‘victim’s’ reactions to the unequal treatment on video.⁵

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⁴ “Fighting for rights of one is the key for rights for all: 30 years BHC”, available online at: https://www.youtube.com/watch?v=9lGoBFScvIA

⁵ “BHC social experiment ‘discriminates’ festival-goers”, available at: https://www.youtube.com/watch?v=MSShQPWRcRY
**Assistance in the context of the Ukraine crisis**

On February 24, 2022, Russia attacked Ukraine, and the refugee flow it unleashed to Europe and Bulgaria has not stopped. This affected the work of BHC, including changes in our communications plans during the year. Immediately after the start of the war, our team started a **donation campaign to help Ukrainian NGOs**. With funds provided by socially engaged companies and artists, donations were purchased for the centre run by the Mati Ukraina NGO.

At the very start of the conflict, it became clear that a new refugee crisis was imminent in Europe. Our team was the first to create a **special section on the organization's website** with important information in Ukrainian, Russian, and Bulgarian. The materials there were prepared by the BHC Refugees and Migrants Legal Protection Programme and a dedicated communications officer and their goal was to assist Ukrainian refugees. We researched and explained in accessible language key needs and administrative cases for Ukrainians temporarily residing in Bulgaria. We created a **BHC Telegram channel**, in which communication was provided on the topics related to Ukrainian refugees residing in Bulgaria. For months, these were the main sources of information both for the refugees themselves and the Bulgarians who assisted them, as well as for the state administration. Subsequently, the information was transferred to the specialized site **Asylum.bg**, which is maintained by the Refugees’ and Migrants Legal Protection Programme.

The team created a Facebook page to help Ukrainian children and their parents in Bulgaria - **Children’s Compass**. The idea is to publish relevant cultural, sports and entertainment events and platforms suitable for children in order to ease the stress of the change they had to endure in their lives. The project is funded by UNICEF.

**“Fragments from Home” exhibition**

The exhibition "Fragments from Home" is a continuation of the exhibition "Priceless Belongings" (see below). The photography project was carried out in collaboration with documentary photographer Anna Stoeva and directs its attention to the story of 14 women fleeing the war in Ukraine.

The women’s stories were presented in a series of Facebook posts on a **specially created page**, as well as in a physical exhibition at the end of July 2022, which presented the photographs of the objects and the journey they and their owners had taken arranged in 14 suitcases. The installation was placed in two central locations in Sofia - in front of the Central Trade Centre Hali, in the waiting room of the Central Railway Station, on the conference premises of the Single Step Foundation "The Steps", and at the American University in Blagoevgrad. The exhibition was covered by the online editions of Svobodna Evropa and Dnevnik, lifestyle media such as Girls from the City, TV stations, BNR, and Darik Radio. The third story from "Fragments from Home"
series was produced in the form of video stories recorded by the author and published on the project's page, as well as on BHC's Instagram profile.

**Human of the Year**

In 2022, the BHC gave out its traditional **Human of the Year awards** for the 15th time. Traditionally, an independent jury selects the winner from among the nominations submitted by the public of individuals and organizations who have made a significant contribution to the promotion of human rights, animal protection and nature protection in the past year. The campaign for the award, the campaign visuals, and the selection of the winner in 2022 were in sync with the prevailing topic during the year: the war in Ukraine and the subsequent significant wave of refugees. The awards were presented at a special ceremony for the second year in a row on the eve of International Human Rights Day, 10 December. A video of the ceremony was broadcast live on the BHC Facebook page.

The Grand Prize "Human of the Year" went to civil society organisations and volunteers assisting Ukraine. Runners-up are the Mission Wings Foundation and the Voice in Bulgaria Centre, which help and work with refugees coming to Bulgaria from Turkey. Instead of a plaque, the grand prize was presented by placing a billboard prepared by Ukrainian-born artist Vicky Knish in front of the Russian Embassy building in Sofia.

**PROJECTS**

**Breaking the Cycle of Gender-Based Violence in Bulgaria**

In 2022, the programme coordinated the activities of the EU project "Breaking the cycle of gender-based violence against women and children in Bulgaria (GBV-OUT)". The BHC Monitoring and Research Programme participated in the project, inter alia with a training for police officers in five Bulgarian cities - Pleven, Varna, Burgas, Plovdiv, and Sofia. A concluding conference was held in Sofia. The activities were carried out together with partners from the Dutch police, who prepared a Handbook for the prevention and response to gender-based violence, which they used for the trainings.

In 2022, the programme implemented communication activities related to the project. Their main goal was to give more publicity and develop a greater sensitivity to the seriousness of the problem of gender-based violence and domestic violence; to induce bystander engagement; to raise awareness

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12 Special site of the award, [https://humanoftheyear.org/](https://humanoftheyear.org/)


15 [https://www.bghelsinki.org/bg/campaigns/GBV-OUT](https://www.bghelsinki.org/bg/campaigns/GBV-OUT)
of the problem and of the ways to intervene. The team used modern and impactful communication tools such as virtual reality and documentary theatre.

The programme team maintains and provides up-to-date content to the spasena.org project website, created with the aim of offering up-to-date information and possible solutions to those affected by domestic violence – victims, perpetrators, and witnesses. The site maintains statistics on the growing number of victims of gender-based violence.

“The End of the Circle” Documentary Theatre

One of the most successful communication activities throughout the year was the series of three video stories “The End of the Circle” related to domestic violence: of the victim, of the accused of violence and of the psychologist. They were filmed using the technique of documentary theatre based on interviews by director Neda Sokolovska. By mid-March 2023, the three videos had been viewed a total of 40,000 times. The videos were filmed in collaboration with the Vox Populi Documentary Theatre Studio. The real stories told in the videos by actresses were collected with the help of BHC partner organisation the Alliance for Gender-Based Violence Association.

Priceless Belongings Exhibition

One of the most successful communication activities during the year was the exhibition “Priceless Belongings” carried out in collaboration with author Anna Stoeva. The exhibition presents fragments of the lives of four victims of domestic violence. It shows a series of photographs of personal belongings revealing the stories of women killed in domestic violence situations by their partners. The exhibition was shown in 2021 in four different key city locations in Sofia. In 2022, the exhibition was among the nominees of the first edition of the “ArtAction of the Year” award in the Reaction category. The exhibition continued being shown in new locations in other cities and was shown in Plovdiv and Blagoevgrad.

Virtual reality: Stop violence!

In the third campaign under the umbrella of the project, we created and promoted a virtual reality video showing a scene of domestic violence, in which the viewer is not just a bystander, but has the opportunity to make a choice whether to intervene and help or remain inactive. In both cases, the viewer can see the consequences of their choice through virtual reality glasses. The virtual experience was shown with VR glasses to passers-by on central streets and locations in three major Bulgarian cities – Sofia, Burgas and Plovdiv in 2022.

Youth workshops for portraits and friends

In May 2022 we organized two free photography courses for students from two Sofia secondary schools. In the course of two days, 34 children with 34 mobile cameras learned the basics of mobile photography and interacted among themselves with the assistance of photographer Vera Gotseva in the

16 https://www.youtube.com/watch?v=Kqh10LNEwp8
17 https://www.bghelsinki.org/bg/events/izlojba-veshti-bez-cennost
18 https://www.youtube.com/watch?v=oi3J6ge0yN4
initiative "Youth workshops for portraits and friends". The young people from mixed backgrounds split into teams and learned how to shoot portraits and details, how to tell thematic stories with their photos. The best works of the children, as well as footage from the workshops, were exhibited in the central garden of the Geo Milev Park between May 19 and June 6 2022. The exhibition was officially opened by the BHK team and the mayor of the Slatina district. The workshops were documented with video\textsuperscript{19} and photos\textsuperscript{20}. The project was financed by the Sofia Municipality under the Europe 2021 Programme and implemented in partnership with the Slatina District.

**Sofia Pride**

In 2022 the BHC continued to provide assistance in the organization of the annual Sofia Pride. Over 15,000 people took part in the 15\textsuperscript{th} edition of the Pride. The BHC Communications Programme took part in the communication with institutions, training of volunteers and maintenance of the event website.

**WEBSITE, SOCIAL NETWORKS, PODCAST, PUBLICATIONS**

The total number of visits to the organization's official website, www.bghelsinki.org, exceeded 154,000 unique visits for 2022. This is an increase of more than 50\% compared to 2021. In 2022 the BHC launched its profile on the social network Instagram intended mainly for photo and video content and targeting a markedly younger audience. Thus, the BHC now has its own profiles in five social media networks: Facebook, Twitter, YouTube, LinkedIn, and Instagram.

As of March 2023, the BHC main Facebook profile in Bulgarian had 16,295 followers – over 1,400 more than in the previous year. The audience was 28\% male and 72\% female. With its diverse content, the page has reached 558,964 people. The number of followers on the English Facebook page was 2,658 users, and that of "Human of the Year" – 2,600 users. The Facebook page of the Prison Reform Project has over 656 followers consisting mainly of individuals who are professionally engaged in the field of criminal law and the penitentiary system. Our Twitter account reached 2,083 people; the LinkedIn page has 418 followers and our YouTube subscribers are already 568 (+200 compared to the previous year). BHC's Instagram account has gained 293 followers.

To mark the 30\textsuperscript{th} anniversary of the BHC, we created the podcast "The Rights and the Individual"\textsuperscript{21} and recorded 5 episodes human rights topics. The podcast discusses current public topics or problems affecting human rights. We distributed a monthly newsletter with news and information about the organization’s latest activities. In March 2023, the number of subscribers was 1,281. The newsletter is additionally sent to the addresses of more than 250 representatives of the media, the non-governmental sector, the state administration and the embassies in Bulgaria.

\textsuperscript{19} https://www.youtube.com/watch?v=iL_cQD0dMU8
\textsuperscript{20} https://bghelsinki.org/bg/campaigns/mladejki-rabotilnici-za-portreti-i-priateli
\textsuperscript{21} https://www.youtube.com/watch?v=bemNU4K8UOY&list=PLvpuufqNzPPk0M_RapWmSvKqo95hEm0mly
PROGRAMMING AND ADMINISTRATION

In 2022, the Programming and Administration programme was responsible for fundraising for the implementation of BHC activities. The primary responsibility of the programme is to provide sustainable financing for the implementation of the different thematic spheres of activities implemented by BHC. The programme is also responsible for the financial and activity reporting to the Bulgarian authorities and to the organisation’s donors. Programme staff also takes part in the implementation of some substantive activities in the framework of BHC projects.

Parallel to engaging in design and elaboration of new projects, the programme also provides administrative support to all BHC programmes in the form of general coordination, administrative support, technical and logistical assistance, support for publications and events organization. Programme staff provides the initial contact with beneficiaries applying for assistance at the BHC office; contacts with journalists in connection with press releases or other publications. The programme organizes the BHC public events, seminars and conferences. In 2022, programme staff participated in the implementation of two EU-funded BHC projects (project for piloting equality data collection and a project for monitoring post-release reintegration of inmates).

In 2022, the programme provided support for the implementation of 14 projects: five EU projects (under the programmes "Justice", "Citizens, Rights, Equality and Values" and "Erasmus+"), one large project under the Active Citizens Bulgaria Fund, and eight other projects funded by public, institutional and several smaller donors.

The programme is also responsible for managing the work of BHC Consulting Ltd. – the BHC profit-making arm. The income from the human rights consulting activities goes 100% to support the human rights work of the BHC non-profit. This income-generating arm allows the BHC to cover approximately 2.5% of expenses annually from its own sources.

SOURCES OF FUNDING

In 2022, the BHC carried out its activities with the support of 12 donors - public bodies and private foundations, which provided us with two types of support - institutional support and project-based support. The complementary of core and project-based funding allows us to implement the entity of activities provided. A complete list of donors, activities supported by them and their share in the annual expenditure is given at the end of this section.

In 2022, BHC worked with the support of public funds (70%) and private foundations (29.5%). A small share of expenses was covered by our own revenue (0.5%).

The main source of funding for BHC in 2022 came from international public funds - the United Nations through UNHCR and UNICEF, which supported the work of the Refugees’ and Migrants Legal Protection Programme, as well as the European Union and the Active Citizens Bulgaria Fund of the Financial Mechanism of EEA. Together with several other smaller public donors, the share of this support in 2022 was 70% (up from 60% in 2021).
International private foundations – the Oak Foundation and the Open Society Foundations - contributed 29.5% of the funding for 2022. A small share of expenses was covered by generated own income (0.5%).

Since 1997, the BHC has had its annual financial statements certified by an independent auditor. All BHC annual financial reports and independent auditor’s reports since 2001 are publicly available on the BHC web site at www.bghelsinki.org.

DONORS AND EXPENDITURE

The total amount of expenditure for BHC activities in 2022 amounted to **BGN 1,932,446 (988,044 EUR)**, which is an increase of 42% compared to 2021 (694,856 EUR). This is due mainly to increased support from UNHCR and UNICEF for activities in support of individuals fleeing the war in Ukraine.

These two UN agencies provided the greatest support to BHC as public donors – the United Nations High Commissioner for Refugees and UNICEF. The share of their support corresponds to 56% of the organization’s activities during the past year. The support went to support the work of the Refugees’ and Migrants’ Legal Protection Program.

The Open Society and Oak International Foundations provided the most support as private donors. The share of their support corresponds to 23.5% of all BHC expenses in 2022. The two foundations provide long-term institutional support to BHC. This type of support is key to our human rights activities and allows us to undertake strategic litigation and be more flexible in our response to emerging crises. As important, this support allows us to participate in calls that require co-funding (such as the European Union, Active Citizens Fund, the German Marshall Fund).
The shares of EU funding increased slightly in 2022 after a large part of our European projects were frozen in 2020-2021 due to the Covid-19 pandemic - the expenditure from these funds in 2022 is 106,860 EUR (10.8%) at 75,760 EUR in 2021.

Some of our other public funders during the year were Active Citizens Fund Bulgaria (2.7%) (this fund supports a 3-year project for reform in the places of detention), as well as Sofia Municipality, Europe Programme and the British Embassy in Sofia.

With the support of the Bulgarian Fund for Women, ECRE, the European Prison Litigation Network and Because Foundation, several smaller projects and initiatives were carried out. They were implemented in the spheres of refugees fleeing from the war on Ukraine, various human rights researches, updates of the AIDA information data base. The share of this support is 1.5% of all BHC expenditure.

The BHC covered 0.5% of its expenditure from own resources through generated income.
EXPENDITURE FOR PROJECTS AND ACTIVITIES

<table>
<thead>
<tr>
<th>Donor</th>
<th>Funded activity</th>
<th>Expenditure in 2022</th>
</tr>
</thead>
<tbody>
<tr>
<td>United Nations High Commissioner for Refugees</td>
<td>Border monitoring, advocacy and legal aid for asylum seekers</td>
<td>405 870 €</td>
</tr>
<tr>
<td>Open Society Foundations</td>
<td>Institutional support for BHC (co-funding)</td>
<td>117 197 €</td>
</tr>
<tr>
<td></td>
<td>Vaccination justice in the context of the Covid-19 pandemic (in collaboration with BOLD Foundation)</td>
<td>46 474 €</td>
</tr>
<tr>
<td>Oak Foundation</td>
<td>Institutional support for BHC (co-funding)</td>
<td>115 903 €</td>
</tr>
<tr>
<td>UNICEF</td>
<td>Strengthening of the protection of unaccompanied migrant children</td>
<td>145 250 €</td>
</tr>
<tr>
<td>European Union</td>
<td>Programmes &quot;Justice&quot;, &quot;Citizens, Rights, Equality and Values&quot; (5 projects)</td>
<td>104 068 €</td>
</tr>
<tr>
<td></td>
<td>Erasmus+ programme, Online human rights guide</td>
<td>2 759 €</td>
</tr>
<tr>
<td>Active Citizens Fund Bulgaria</td>
<td>Assessment of the reform in prisons: Legislation and practice after Neshkov</td>
<td>26 350 €</td>
</tr>
<tr>
<td>Europe Programme, Sofia Municipality</td>
<td>Youth photography workshops for portraits and friends</td>
<td>5 245 €</td>
</tr>
<tr>
<td>Bulgarian Women's Fund</td>
<td>Emergency fund in support of women and children victims of the war in Ukraine</td>
<td>5 113 €</td>
</tr>
<tr>
<td>European Prison Litigation Network</td>
<td>PRISONCIVILACT Project</td>
<td>4 935 €</td>
</tr>
<tr>
<td>ECRE</td>
<td>Update of the AIDA information data base</td>
<td>3 190 €</td>
</tr>
<tr>
<td>Because Foundation</td>
<td>Activities in support of refugees and those feeling the war in Ukraine</td>
<td>572 €</td>
</tr>
<tr>
<td>Embassy of the United Kingdom</td>
<td>Communications activities, Right for All Campaign</td>
<td>547 €</td>
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<tr>
<td>Income from consultancies, reimbursement of costs</td>
<td>Unforeseen expenditure</td>
<td>4 569 €</td>
</tr>
<tr>
<td><strong>TOTAL:</strong></td>
<td></td>
<td><strong>988 044 €</strong></td>
</tr>
</tbody>
</table>

Note: The amounts are outgoing cash flows.

STAFF

Monitoring and Research Programme:
Antoaneta Nenkova (researcher)
Dilyana Angelova (researcher)
Krassimir Kanev (programme director)
Mariya Yanakieva (researcher)
Slavka Kukova (researcher)

Legal Defence Programme:
Adela Kachaunova, attorney-at-law (legal director)
Velislav Kovachev (paralegal, until October)
Diana Dragieva (attorney-at-law)
Iveta Savova (attorney-at-law)
Radoslav Stoyanov (communications expert)

Campaigns and Communications Programme:
Angelina Genova (communications expert, on maternity leave)
Bosilena Melteva (communications expert)
Mila Tsalova (communications expert, from December)
Nadezda Tsekulova (programme director)
Radoslav Stoyanov (communications expert)

Programming and Administration:
Desislava Simeonova (programme director)
Eliza Tsvetanova (technical assistant)
Severina Petkova (accountant clerk)
Teodora Veselinova (technical assistant)
Vera Naydenova (head accountant)
Zhelkova, Staneva and Georgiev Accounting Firm exercised external control on BHC accounts

Refugees’ and Migrants Legal Protection Programme:
Alexandra Dichevska (legal consultant)
Antoaneta Dedikova (legal consultant)
Desislava Tyaneva (legal consultant)
Dimitar Slavov (attorney-at-law)
Dmitrii Popsulis (attorney-at-law)
Elitsa Sekulova (accountant)
Galina Golikova (legal consultant)
Georgi Voinov (attorney-at-law)
Iliana Savova, attorney-at-law (programme director)
Ivan Vassilev (profiler)
Katya Dimitrova (legal consultant)
Mariana Ivanova-Nikolova (attorney-at-law)
Martin Hristov (attorney-at-law)
Milen Hristov (legal consultant)
Olena Zimnitzka (legal consultant)
Plamen Bozhilov (attorney-at-law)
Plamen Zhelev (attorney-at-law)
Valentina Nielsen (attorney-at-law)
Victoria Posvalyuk (legal consultant)

The programme activities in 2022 were supported by the translators Ali Djaradat, Badran Djarous, Vladimir Panov, Emilia Mihaylova, Ibrahim Djaravat, Mohamad Orfani and Salahuddin Paktiaval.
GOVERNANCE

GENERAL ASSEMBLY

The BHC activities are directed by the General Assembly. The General Assembly is the supreme governing body of the association. Its members in 2022 were:


EXECUTIVE COMMITTEE

The Executive Committee is responsible for the organisation’s operative management. Its members are elected from among the General Assembly with a two-year mandate.

The current members of the Executive Committee (with a mandate March 2022 – March 2023) are: Krassimir Kanev, chair, Victor Lilov, deputy chair, Vulko Stanev, Rossitsa Atanasova and Stana Iliev.
ANNUAL FINANCIAL REPORT, INDEPENDENT AUDITOR’S REPORT

See below.
СДРУЖЕНИЕ БЪЛГАРСКИ ХЕЛЗИНСКИ КОМИТЕТ

ГОДИШЕН ФИНАНСОВ ОТЧЕТ
За годината към 31.12.2022 г.

С НЕЗАВИСИМ ОДИТОРСКИ ДОКЛАД

Заверил:
Деян Константинов, чрез Константинов Одит ЕООД

Дата на одобрение на финансовия отчет:
София, 27 март 2023 г.
### ЗАПИС В ЕКЗЕМПЛЯРА НА ФИНАНСОВИЯ ОТЧЕТ ЗА 2022 ГОДИНА

<table>
<thead>
<tr>
<th>Разходи по дейности</th>
<th>Сума (хил.лв)</th>
<th>Приходи по дейности</th>
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<tr>
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<td><strong>Б. ПРИХОДИ</strong></td>
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<td>1. Сухуми</td>
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<td>2. Промишленост</td>
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<td>3. Търговия</td>
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<td>3. Нетни приходи от финансови приходи</td>
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<td>4. Общ разходи за оперативната дейност</td>
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<td>5. Приходи от участия в дъщерни, асоциирани и смесени предприятия, в т.ч.:</td>
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<td>5. Общ разходи</td>
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<td>6. Приходи от участие в дъщерни, асоциирани и смесени предприятия, в т.ч.:</td>
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**Приложенията от страница 36 до страница 49 са неразделна част от финансовия отчет.**

**Дата на одобрение:** София, 27 март 2023 г.

**Ръководител:** Александър Георгиев

**Съставител:** Красимир Кънев

**София, 27 март 2023 г.**
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Приложенията от страница 36 до страница 49 са неразделна част от финансния отчет.

Дата на одобрение: София, 27 март 2023 г.

Съставител: Александр Георгиев

Ръководител: Кrasimir Kanev

ALEXANDER KIRILOV

GEORGIJEV

Digitally signed by

ALEXANDER KIRILOV

GEORGIJEV

Date: 2023.03.27

15:45:32 +03'00'
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Приложениата от страница 36 до страница 49 са неразделна част от финансова отчет.

Дата на одобрение: София, 27 март 2023 г.
Съставител: Александр Георгиев за Желкова, Станева и Георгиев - счетоводна кантора ООД
Ръководител: Красимир Кънев

ALEXANDER KIRILOV GEORGIEV
Digitally signed by ALEXANDER KIRILOV GEORGIEV
Date: 2023.03.27 15:45:52 +03'00'

Krassimir Ivanov Kanev
Digitally signed by Krassimir Ivanov Kanev
Date: 2023.03.27 16:34:44 +03'00'
## Счетоводен баланс

Сдружение български хелзинки комитет
Към 31.12.2022 г.

### Актив

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Прекинатите от страница 36 до страница 69 са неразделна част от финансовия отчет.

Дата на одобрение: Sofia, 27 март 2023 г.
Съставител: Александр Георгиев
Ръководител: Красимир Кънев

Alexandre Kirilov Georgiev
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ALEXANDER KIRILOV GEORGIEV
Date: 2023.03.27
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Красимир Иванов Канев
Digitally signed by
Krassimir Ivanov Kanev
Date: 2023.03.27
15:46:15 +03'00'

ALEXANDE R KIRILOV GEORGIEV
Digitally signed by
ALEXANDER KIRILOV GEORGIEV
Date: 2023.03.27
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ALEXANDE R KIRILOV GEORGIEV
Digitally signed by
ALEXANDER KIRILOV GEORGIEV
Date: 2023.03.27
15:46:15 +03'00'

ALEXANDE R KIRILOV GEORGIEV
Digitally signed by
ALEXANDER KIRILOV GEORGIEV
Date: 2023.03.27
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ALEXANDER KIRILOV GEORGIEV
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Date: 2023.03.27
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ALEXANDE R KIRILOV GEORGIEV
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Приложенията от страница 36 до страница 49 са неразделна част от финансова отчет.

Съставител:
Alexander Georgiev
за Желкова, Станева
и Georgiev - счетоводна кантора ООД

Ръководител:
Krassimir Ivanov Kanev

Дата на одобрение:
София, 27 март 2023 г.
София, 27 март 2023 г.

Дата на одобрение:

предприятия
Акциии и дялове в асоциирани и смесени предприятия
Предоставени заеми на предприятия от група на изграждане
Предоставени аванси и дълготрайни материални активи в процес
- Други ДМА
- Офис обзавеждане
- Транспортни средства
- Търговска репутация
- Други ДНМА

Плановият годинен износ в началото на периода
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Отчетна стойност на нетекущите активи:
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ДОКЛАД НА НЕЗАВИСИМИЯ ОДИТОР

ДО ОБЩОТО СЪБРАНИЕ
НА СДРУЖЕНИЕ “БЪЛГАРСКИ ХЕЛЗИНКСКИ КОМИТЕТ”

Мнение

Ние извършихме одит на финансия отчет на СДРУЖЕНИЕ “БЪЛГАРСКИ ХЕЛЗИНКСКИ КОМИТЕТ” („Сдружението”), съдържащ счетоводния баланс към 31 декември 2022г., отчета за приходите и разходите-стопанска дейност, отчета за приходите и разходите - нестопанска дейност, отчета за собствения капитал и отчета за паричните потоци за годината, завършваща на тази дата, както и приложение към финансия отчет, съдържащо оповестяване на съществените счетоводни политики и друга пояснителна информация.

По наше мнение, приложенит финансов отчет представя достоверно, във всички съществени аспекти, финансовото състояние на СДРУЖЕНИЕ “БЪЛГАРСКИ ХЕЛЗИНКСКИ КОМИТЕТ” към 31 декември 2022г. и неговите финансови резултати от дейността и паричните му потоци за годината, завършваща на тази дата, в съответствие с Националните счетоводни стандарти (НСС), приложими в България.

База за изразяване на мнение

Ние извършихме нашият одит в съответствие с Международните одиторски стандарти (МОС). Нашите отговорности съгласно тези стандарти са описани допълнително в раздела от нашия доклад „Отговорности на одитора за одита на финансия отчет”. Ние сме независими от СДРУЖЕНИЕ “БЪЛГАРСКИ ХЕЛЗИНКСКИ КОМИТЕТ ” в съответствие с Международния етичен кодекс на професионалните счетоводители (включително Международни стандарти за независимост) на Съвета за международни стандарти по етика за счетоводители (Кодекса на СМСЕС), заедно с етичните изисквания на Закона за независимия финансов одит (ЗНФО), приложими по отношение на нашия одит на финансия отчет в България, като ние изпълняваме и нашите други етични отговорности в съответствие с изискванията на ЗНФО и Кодекса на СМСЕС. Ние считаме, че одиторските доказателства, получени от нас, са достатъчни и уместни, за да осигурят база за нашето мнение.

Друга информация, различна от финансия отчет и одиторския доклад върху него

Представляващият на Сдружението носи отговорност за другата информация. Другата информация се състои от доклад за дейността, изготвени от представляващият на Сдружението съгласно Глава седма от Закона за счетоводството, но не включва финансия отчет и нашия одиторски доклад върху него.

Нашето мнение относно финансия отчет не обхваща другата информация и ние не изразяваме каквото и да е форма на заключение за сигурност относно нея, освен ако не е изрично посочено в доклада ни и до степента, до която е посочено.

Във връзка с нашия одит на финансия отчет, нашата отговорност се състои в това да прочетем другата информация и по този начин да преценим дали тази друга информация е в съответствие с финансовия отчет или с нашите познания, придобити по време на одита, или по друг начин изглежда да съдържа съществено неправилно докладване. В случай че на базата на работата, която сме извършили, ние достигнем до заключение, че е налице съществено неправилно докладване в тази друга информация, от нас се изисква да докладваме този факт.

Нямаме какво да докладваме в това отношение.
Допълнителни въпроси, които поставя за докладване Законът за счетоводството

В допълнение на нашите отговорности и докладване съгласно МОС, по отношение на доклада за дейността, ние изпълняваме и процедурите, добавени към изискванияте по МОС, съгласно „Указания относно нови и разширенi одиторски доклади и комуникация от страна на одитора” на професионалната организация на регистрираните одитори в България, Института на дипломираните експерт-счетоводители (ИДЕС)“. Тези процедури касаят проверки за наличието, както и проверки на формата и съдържанието на тази друга информация с цел да ни подпомогнат във формиране на становище относно това дали другата информация включва оповестяванията и докладванията, предвидени в Глава седма от Закона за счетоводството, приложим в България.

Становище във връзка с чл. 37, ал. 6 от Закона за счетоводството

На базата на извършените процедури, нашето становище е, че:

а) Информацията, включена в доклада за дейността за финансовата година, за която е изготвен финансовият отчет, съответства на финансовия отчет.

б) Докладът за дейността е изготвен в съответствие с изискванията на Глава седма от Закона за счетоводството.

Отговорности на представляващият на Сдружението за финансовия отчет

Представляващият на Сдружението носи отговорност за изготовянето и достоверното представяне на този финансов отчет в съответствие с НСС, приложими в България и за такава система за вътрешен контрол, каквато представляващият на Сдружението определя като необходима за осигуряване изготвянето на финансови отчети, които не съдържат съществени неправилни отчитания, независимо дали дължат се на измама или грешка.

При изготвяне на финансовия отчет представляващият на Сдружението носи отговорност за оценяване способността на СДРУЖЕНИЕ “БЪЛГАРСКИ ХЕЛЗИНКСКИ КОМИТЕТ” да продължи да функционира като действащо предприятие, оповестявайки, когато това е приложимо, въпроси, свързани с предположението за действащо предприятие и използваните счетоводната база на основата на предположението за действащо предприятие, освен ако представляващият на Сдружението не възнамерява да ликвидира Сдружението или да преустанови дейността му, или ако представляващият на Сдружението на практика няма друга алтернатива, освен да постъпи по този начин.

Отговорности на одитора за одита на финансовия отчет

Нашите цели са да получим разумна степен на сигурност относно това дали финансовият отчет като цяло не съдържа съществени неправилни отчитания, независимо дали дължаци се на измама или грешка, и да издадем одиторски доклад, който да включва нашето одиторско мнение. Разумната степен на сигурност е висока степен на сигурност, но не е гаранция, че одит, извършен в съответствие с МОС, винаги ще разкрива съществено неправилно отчитане, когато такова съществува. Неправилни отчитания могат да възникнат в резултат на измама или грешка и се считат за съществени, ако би могло разумно да се очаква, че те, самостоятелно или като съвкупност, биха могли да окажат влияние върху икономическите решения на потребителите, вземани въз основа на този финансов отчет.
Като част от одита в съответствие с МОС, ние използваме професионална преценка и запазваме професионален скептицизъм по време на целия одит. Ние също така:

- идентифицираме и оценяваме рисковете от съществени неправилни отчитания във финансовия отчет, независимо дали дължащи се на измама или грешка, разработваме и изпълняваме одиторски процедури в отговор на тези рискове и получаваме одиторски доказателства, които да са достатъчни и уместни, за да осигурят база за нашето мнение. Рискът да не бъде разкрито съществено неправилно отчитане, което е резултат от измама, е по-висок, отколкото риска от съществено неправилно отчитане, което е резултат от грешка, тъй като измамата може да включва тайно споразумявање, фалшифициране, преднамерени пропуски, изявления за въвеждане на одитора в заблуждение, както и пренебрегване или заобикаляне на вътрешния контрол.

- получаваме разбиране за вътрешния контрол, имащ отношение към одита, за да разработим одиторски процедури, които да са подходящи при конкретните обстоятелства, но не с цел изразяване на мнение относно ефективността на вътрешния контрол на Сдружението.

- оценяваме уместността на използваните счетоводни политики и разумността на счетоводните приблизителни оценки и свързаните с тях оповестявания, направени от представляващия на Сдружението.

- достигаме до заключение относно уместността на използване на страна на представляващия на Сдружението на счетоводната база на основата на предположението за действащо предприятие и, на базата на получените одиторски доказателства, относно това дали е налице съществена несигурност, отнасяща се до събития или условия, които биха могли да породят значителни смъртта относно способността на СДРУЖЕНИЕ “БЪЛГАРСКИ ХЕЛЗИНКСКИ КОМИТЕТ” да продължи да функционира като действащо предприятие. Ако ние достигнем до заключение, че е налице съществена несигурност, от нас се изисква да привлечем внимание в одиторския си доклад към свързаните с тази несигурност оповестявания във финансовия отчет или в случай че тези оповестявания са неадекватни, да модифицираме мнението си. Нашите заключения се основават на одиторските доказателства, получени до датата на одиторския ни доклад. Бъдещи събития или условия обаче могат да станат причина СДРУЖЕНИЕ “БЪЛГАРСКИ ХЕЛЗИНКСКИ КОМИТЕТ” да преустанови функционирането си като действащо предприятие.

- оценяваме целостното представяне, структура и съдържание на финансовия отчет, включително оповестяванията, и дали финансовият отчет представя основополагащите за него сделки и събития по начин, който постига достоверно представяне.

Ние комуникираме с представляващият на Сдружението, наред с останалите въпроси, планираните обхват и време на изпълнение на одита и съществените констатации от одита, включително съществени недостатъци във вътрешния контрол, които идентифицираме по време на извършване от нас одит.

Регистриран одитор:

ДЕЯН КОНСТАНТИНОВ
27 март 2023 година
Гр. Сливен, България
Ул. „Мур” 13-А-4