



ОМБУДСМАН
НА РЕПУБЛИКА БЪЛГАРИЯ

OMBUDSMAN OF THE REPUBLIC OF BULGARIA Annual Report of Activities

2025

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MARCH 2026



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НА РЕПУБЛИКА БЪЛГАРИЯ

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FORWARD



*The year 2025 marked **20 years since the election of the first Ombudsman** – a significant milestone that provides an opportunity to reflect on the institution’s development as an independent defender of citizens’ rights. An advocate who responds to violations of rights, seeks solutions to specific problems and brings systemic shortcomings in the work of institutions to the forefront of public attention.*

*During the reporting year alone, **102 138 citizens and representatives of organisations** received assistance from the Ombudsman institution – through the review of complaints and signals, the provision of advice, the conduct of inspections, the issuance of recommendations, outreach events and active intervention with government and local authorities. This significant number is a clear sign of the public’s enduring trust in the Ombudsman and of the institution’s growing role in the protection of civil rights.*

Over the two decades since its establishment, the Ombudsman institution has established itself as a national human rights institution with a growing role in the protection of civil rights and a recognised international reputation. Its powers have been gradually expanded – the Ombudsman has been granted the authority to refer cases to the Constitutional Court, to request interpretative judgments from the supreme courts, to perform the functions of a National Preventive Mechanism, and to protect the rights of the child.

The year 2025 was also key from an institutional standpoint. After more than 15 months without an incumbent in the position, the National Assembly elected Velislava Delcheva as Ombudsman in July, and Deputy Ombudsman Maria Filipova was elected in September. In this way, the institution restored its full statutory capacity and its active role in protecting the citizens’ rights.

During the year, the Ombudsman successfully secured the re-accreditation of the institution as a national human rights institution with the highest international A Status in accordance with the UN Paris Principles. This recognition confirms the institution’s

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independence, sustainability and effectiveness and enables the Bulgarian Ombudsman to participate fully in the work of international human rights mechanisms and to defend human rights at the highest international forums.

In 2025, the institution's work focused on protecting the citizens' rights in a number of key public areas – access to public services, consumer protection, financial services, administrative services and quality of public policies. Particular attention was paid to children's rights and the need for a modern and effective reform of the juvenile justice system.

*During the year, the Ombudsman institution championed a number of important public causes and achieved tangible results. Among them are the proposals for a fairer water pricing model, the elimination of the so-called “**water meter fee**”, as well as the introduction of compensation mechanisms for citizens in cases of poor-quality water supply. As a result of the Ombudsman's intervention, a regulatory outcome was also achieved regarding **fast loans**, creating the possibility for citizens to be removed as debtors from credit registries upon the declaration of contracts as null and void.*

*One of the key initiatives in 2025 was the national information campaign **Pensions in Euro** carried out in collaboration with the National Social Security Institute. Through outreach efforts in the form of Reception Rooms in a number of towns, elderly people received accessible information about the conversion of pensions and the safeguards against abuse in connection with the introduction of the euro on **1 January 2026**.*

This annual report outlines the main areas of the institution's work in 2025, provides an analysis of the complaints and signals received, details the actions taken to protect the citizens' rights and presents the Ombudsman's recommendations to addressing the systemic issues identified.

ACTIONS AND RESULTS

The Ombudsman in Defence of Citizens' Rights in 2025

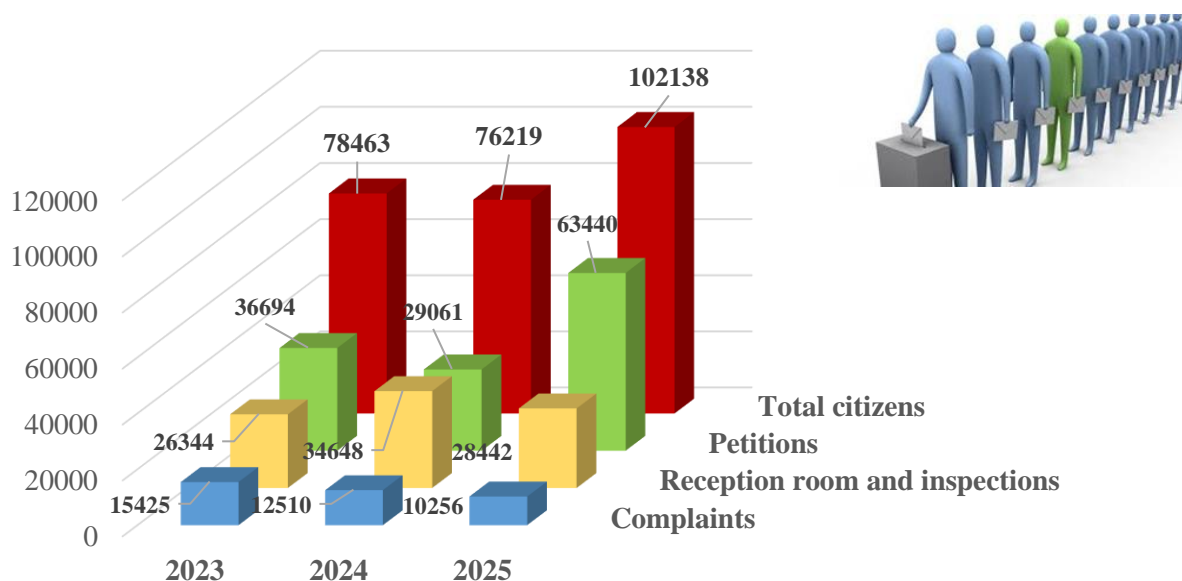
A total of **102 138 citizens** and representatives of various organisations received assistance from the Ombudsman, of which:

- ✓ Complaints submitted to the Ombudsman: **10 256**;
- ✓ **12 418 persons** were received by the Ombudsman or by the Deputy Ombudsman, their requests being followed up and receiving services at the Reception Office;
- ✓ The number of citizens who sought the Ombudsman's assistance and whose requests concerning various issues were subsequently consolidated into petitions was **63 440**.

Table No. 1 Number of completed inspections as per results in the period 2023 – 2025

2023	2024	2025	Completed inspections based on complaints and signals by means of:
3 245	2 431	1 678	<i>Recommendation</i>
9 856	8 879	5 503	<i>Opinion</i>
819	1 024	914	<i>Advice</i>
612	872	758	<i>Intermediation</i>
147	270	343	<i>Outside the Ombudsman's remit</i>

Figure No. 1 Statistics about the Ombudsman's work 2023 – 2025



KEY EVENTS AND INITIATIVES IN 2025

ELECTION OF OMBUDSMAN AND DEPUTY OMBUDSMAN

After more than 15 months without a permanent holder of the office, on 18 July 2025, the 51st National Assembly elected Velislava Delcheva as the fifth Ombudsman of the Republic of Bulgaria, with 123 votes in favour, 92 against and 5 abstentions.

“I would like to thank you for the support you have shown me today, while I recognize that I face the serious task of living up to the high expectations and the trust placed in me. I will not make any promises, because I know that there is a lot of work ahead and it requires action, not words,” the new Ombudsman said.

Delcheva further stated that she was taking the oath with a clear understanding of the responsibility she was assuming not only before the Members of Parliament, but above all before the Bulgarian people, and emphasised that the institution’s significance was immense.



On 10 September 2025, the National Assembly elected Maria Filipova to the position of Deputy Ombudsman.



RE-ACCREDITATION OF THE INSTITUTION WITH THE A STATUS UNDER UN PARIS PRINCIPLES

In 2025, Ombudsman Velislava Delcheva successfully secured the re-accreditation of the national human rights institution with the highest possible A Status in accordance with the Paris Principles. The decision was made at the final 2025 session of the UN Sub-Committee on Accreditation (SCA), of which the institution was officially notified by a letter from the European Network of National Human Rights Institutions (ENNHRI).



The A status is granted to the Ombudsman institution for meeting the highest international standards of independence, impartiality, pluralism, transparency and the broadest possible mandate in protecting and promoting human rights. It certifies the institution's full compliance with the Paris Principles – the foundational international standard for the functioning of national human rights institutions.

The UN Sub-Committee on Accreditation notes that the new legal provisions allowing the Ombudsman or Deputy Ombudsman to assume the functions of caretaker Prime Minister could affect the reputation and actual independence of the national human rights institution.

The UN Sub-Committee recommends that the Ombudsman continue to advocate for amendments to Article 99, para 5 of the Constitution of the Republic of Bulgaria and Article 14, para 1 of the Ombudsman Act in order to remove the provision under which the Ombudsman and the Deputy Ombudsman may be appointed as caretaker Prime Minister.

The A Status accreditation enables the national human rights institution to raise issues of national importance before the highest international human rights forums and to participate actively in the development of international policies and standards in the field of human rights – the Ombudsman may participate fully in the work of the UN human rights committees, as well as in the Human Rights Council, express positions and raise matters related to the rights and freedoms of the citizens of the Republic of Bulgaria. Only 20 European Union Member States have a national human rights institution with such a status.

ESTABLISHMENT OF A CIVIL ADVISORY COUNCIL ON HUMAN RIGHTS

Ombudsman Velislava Delcheva established a **Civil Advisory Council** composed of experts from the non-governmental sector **which meets to discuss specific priority matters in the field of human rights protection.**

The First Civil Council discussed the topic of **juvenile justice** which has been undergoing reform for over a decade.

The Ombudsman calls for **reform of the juvenile justice system** and an assessment of the need to establish specialised juvenile courts. She raises the matter of repealing the outdated Combating Juvenile Anti-Social Behaviour Act, in effect since 1958, and adopting a Diversion from Criminal Proceedings and Imposition of Educational Measures on Minors Act. She supports the closure of reform boarding schools and the introduction of modern and effective measures for working with child

offenders, including restorative measures and preventive work. She calls for the creation of a protective social system that includes a network of integrated services, educational, psychosocial and protective measures and support mechanisms for children in conflict with the law and their families.

The public discussion organised by the Ombudsman gathered prominent experts with many years of experience in the field of protecting children’s rights and interests – National Network for Children, Legal Aid Network, Institute of Social Activities and Practices, the P.U.L.S. Foundation – Pernik, the Bulgarian Centre for Not-for-Profit Law, Lachezar Tsotsorkov Foundation, Animus Association Foundation, Partners – Bulgaria Foundation, IGA Foundation – Pazardzhik, Centre for the Study of Democracy, FICE – Bulgaria, Association for Restorative Justice, and others.

“We are pleased to have the opportunity to begin work on what I consider a key matter, children’s rights and juvenile justice, which I have placed at the top of my list of priorities. My fundamental position is that children under the age of 14 are at risk and should under no circumstances come into contact with the law. They need support and protection,” Velislava Delcheva said.

The main issues raised by the Public Advocate are: Children under 14 years of age – a responsibility of the social system and of universal and social services for children, or solely subject to special corrective measures. The vision for the social system’s involvement in working with and supporting children and families exhibiting unlawful behaviour and in conflict with the law. An institutional network for response, intervention and support for children in conflict with the law. A domestic remedy for protecting children’s rights upon placement in reform boarding schools.

“The purpose of today’s meeting is to generate ideas and questions; the experts representing the Ombudsman institution will take into account the positions of the organisations so that we can incorporate them into the bill,” Delcheva added.

The Ombudsman and all experts are united in their commitment to support the development of political will for reform in the field of juvenile justice; to adopt a long-term vision for the direction in which to move; to make effective use of current resources and best practices within the system; to establish the leading role of social services; and, last but not least, to ensure proper communication and a shift in public attitudes toward the rights of children in conflict with the law.



CHILDREN’S RIGHTS: A KEY PRIORITY IN OMBUDSMAN’S AGENDA

From the moment she took office, Ombudsman Velislava Delcheva has made the protection of children’s rights a priority, particularly for those at risk who will be the focus of her work. Her efforts are directed toward supporting children from vulnerable groups, those in conflict with the law, in foster care, with special educational needs, placed in residential care, as well as unaccompanied children – refugees and others. The priorities also include measures to combat and prevent domestic violence.

Another key priority in her work is **promoting civic engagement and raising awareness of fundamental human rights among young people** and **raising awareness of the institution’s activities**, including through the Civic Education class. Delcheva spoke with students from across the country and listened to their views on topics that directly affected them – violence and aggression, the

proposal of the Ministry of Education to introduce a new subject titled “Virtues and Religions,” the use of mobile phones at school, restrictions on social media for children, and other hot topics.

“People often say: It’s not up to me; let them do whatever they want. But in fact, that’s not true: you are the future; tomorrow, you will be in charge, and that’s why you need to take an interest in what’s happening around you today,” Delcheva emphasised at one of the schools she visited, Ivan Vazov Secondary School in Pomorie.

“The matter of introducing a course titled “Virtues and Religions” necessitates further public debate because it is clear that society is polarised on this topic.” The Ombudsman made this statement before the Parliamentary Committee on Human Rights and Religious Denominations during the presentation of a summary opinion on two bills amending and supplementing the Pre-School and School Education Act.

“Violence against and among children is not “part of growing up”. It is not inevitable. It is not normal.” The Ombudsman made this statement at the opening of the forum “Our Children, Our Responsibility: The (Ir)reparable While We Wait for Effective Solutions” organised by the Lachezar Tsotsorkov Foundation.

“One in six children aged 2 to 14 has regularly been subjected to corporal punishment by their caregivers.” Velislava Delcheva made this statement at the launch of the “Be Brave, Be Kind” campaign organised by the State Agency for Child Protection for the second year in a row.

PENSIONS IN EURO INFORMATION CAMPAIGN

Ombudsman Velislava Delcheva organised a national information campaign titled Pensions in Euro. It was prompted by complaints received by the Ombudsman office indicating that the process of converting pensions to euros caused concern among a significant number of senior citizens.

On 19 September in Dupnitsa, the Ombudsman and the Director of the National Social Security Institute, Vesela Karaivanova, launched the initiative aimed primarily at elderly citizens in small towns and villages in connection with the introduction of the euro on 1 January 2026.

“Our initiative complements the government’s campaign, but our main focus is on elderly citizens. We will advise them on all matters related to the upcoming change – from the conversion of pensions to euro to how to recognise counterfeit banknotes so that they don’t fall victim to fraud,” Delcheva summarised.

Over the course of four months, the Ombudsman organized outreach Reception Rooms across the country, where, in collaboration with the National Social Security Institute she advised pensioners on how to exchange currency, what the limit was for a single exchange, how pensions, social benefits and salaries would be recalculated, whether contracts needed to be re-signed, and other related matters.



19 September, Dupnitsa



30 September, Samokov



3 October, Veliko Tarnovo

**A PERMANENT FOCUS: PROTECTING THE
RIGHTS OF CITIZENS AS USERS OF PUBLIC**

In 2025, complaints from users of public services accounted for 30.31% of the total number of complaints received by the institution that year, with complaints in the Heat Supply sector ranking first, followed by complaints against water and sewerage operators, mobile operators, banks and so on.

In the Heat Supply sector

During the public discussion on heat energy for heating and hot water prices, the Ombudsman institution presented a reasoned opinion to the Energy and Water Regulatory Commission (EWRC) opposing the planned price increases.

The Ombudsman institution submitted an opinion to the Minister of Energy opposing the draft text of § 2 of the Proposed Ordinance to Amend and Supplement the Heat Supply Ordinance, according to which the amount of thermal energy emitted by the building's installation is set at 30 per cent of the amount of thermal energy used for heating in condominium buildings; the proposal was subsequently withdrawn.

In relation to the suspension of the implementation of the formula for the allocation of heating costs in condominium buildings, the Ombudsman repeatedly reached out the Minister of Energy to inquire about the urgent measures planned to address the legal vacuum.

The Ombudsman institution turned to the Chair of the Energy Committee of the 51st National Assembly, proposing a hearing with the CEO of Toplofikatsiya Sofia EAD, the EWRC Chair and the Minister of Energy on matters related to the substandard provision of heat energy.

With regard to the unprecedented scale and duration of the renovation work in the Druzhba-2 residential complex, the Ombudsman insisted that the competent authorities conduct inspections. She also turned to the Mayor of Sofia Municipality for a statement regarding the development, publication and adherence to schedules for the execution of renovation activities and the management of their consequences, including the readiness of the management of daycare centres, kindergartens, schools and medical institutions to operate without heating and hot water, ensuring access to buildings in the repair area, and transparency and accountability regarding the schedule for fulfilling obligations to restore fully road surfaces and pavements after the completion of construction and renovation work.

In the WSS sector

2025 – An unprecedented water crisis.

Severe water restrictions in August 2025 in Pleven and surrounding villages: the Ombudsman turned to the Minister of Regional Development and Public Works with a recommendation to announce a plan to deal with the water crisis in Pleven, including urgent and long-term measures to resolve it, specifying specific deadlines, including ensuring drinking water for the affected population.

Pursuant to § 6 of the Transitional and Final Provisions of Ordinance No. 4, the Ombudsman issued a recommendation to the Minister of Regional Development and Public Works to provide written instructions to WSS operators and municipalities regarding the application of Article 41, para 6: "In the event of a complete stoppage or significant reduction in the water quantity in urban areas or parts thereof, regardless of the causes, the operator, in cooperation with the municipal administration, shall ensure the supply of drinking water to the population until the water service is restored."

In response to petitions from residents of the town of Breznik, the Ombudsman reached out to the Managing Director of WSS Pernik recommending that no charges be imposed for the water supply service on the affected population or that the price of the WSS service be reduced pursuant to Article 31, para 2 of the General Terms and Conditions for the Provision of WSS Services to Consumers by WSS Pernik, as it did not meet the quality requirements for water intended for drinking and residential use.

The Ombudsman institution contacted WSS Shumen requesting that water supply prices be reduced for the period during which consumers in the affected communities received water that was unfit for drinking.

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The Ombudsman participated in a meeting of the Committee on Regional Policy, Public Works and Local Self-Government of the 51st National Assembly regarding the Water Supply and Sewerage Bill submitted by the Council of Ministers on 25 July 2025. In her remarks, Velislava Delcheva emphasised the importance of adopting a law that would truly guarantee the people’s right to access WSS services at economically justified prices linked to the fulfilment of quality indicators.



In her opinion, the Ombudsman objected to the proposal to introduce a “water meter fee.” She suggested that, if the fee for access to the relevant WSS service would be retained, the law should specify the basic rules to determine it and which costs it would cover; she objected to the method of determining the social affordability of the water price, as well as to the issuance of an enforcement order under Article 410, para 1 of the Civil Procedure Code regardless of the amount of the claim.

She proposed the introduction of a uniform price based on the method of water supply within the territory of one WSS operator – a uniform price for gravity-fed systems, a uniform price for pumped systems and a uniform price for mixed systems; the establishment of a procedure to apply a lower water price when it does not meet the regulatory quality requirements; the implementation of the water restrictions to be carried out by WSS operators.



“There has been no improvement in quality, yet the water prices continue to rise – this is unacceptable.” With this statement, Ombudsman Velislava Delcheva addressed the EWRC during the public discussion of the Report and the Draft Amendment to the approved prices of WSS services for 2026.

Regarding the Draft Amendment to the General Terms and Conditions for the Provision of WSS Services to Consumers by Sofiyska Voda AD, the Ombudsman objected to the practice of notifying consumers of the meter reading date solely by electronic means; the advance payment of a fee for a joint inspection at condominium buildings in cases where there is a 20 per cent difference between individual and total consumption; the receipt of invoices only at an email address provided by the consumers.

Financial Services

In August 2025, in a letter to the Deputy Governor of the Bulgarian National Bank and Head of the Banking Department, Mr. Petar Chobanov, the Ombudsman proposed discussing the possibility of amending Ordinance No. 22 of 16 July 2009, on the Central Credit Register to provide for a mechanism whereby an interested natural person would have the right to request the deletion of information in the Central Credit Register regarding their credit indebtedness when their loan agreement has been declared

null and void by a court. The Ombudsman's recommendation was adopted and entered into force in February 2026.

In order to protect the rights of university students and doctoral candidates as borrowers, the Ombudsman turned to the Minister of Education and Science and the Minister of Finance with a recommendation to review and amend Article 10, para 2 of the Standard Loan Agreement for University Students and Doctoral Candidates pursuant to which: "During the grace period, the Bank shall charge interest on the disbursed portion of the loans which shall be capitalised annually."

The Ombudsman drew the attention of the Bulgarian National Bank to issues raised by citizens regarding the purchase of starter kits containing euro.

In the Electricity Supply Sector

In order to protect the rights of electricity consumers, the Ombudsman turned to the Minister of Energy and the Minister of Finance as per their competence to provide an opinion on the application of § 1, item 2a of the Energy Act and Article 4, item 51 of the Excise Duties and Tax Warehouses Act, effective as of 17 July 2012, with respect to non-profit legal entities serving the public interest, associations registered under the Condominium Management Act and entities registered under the BULSTAT Act that use electricity for residential purposes at their premises, as well as regarding the need for an amendment or binding interpretation of the terms "residential purposes" and "residential customer" in the Excise Duties and Tax Warehouses Act and the Energy Act.

Transportation Services

In light of the announced strike by public transportation workers in Sofia, the Ombudsman institution reached out to the Mayor of Sofia Municipality with proposals to mitigate some of the consequences of the strike, which would, to a certain extent, compensate for the lack of ground transportation.

Waste Collection

In response to numerous complaints regarding the waste collection in the districts of Lyulin, Krasno Selo, Poduyane and Slatina in Sofia, the Ombudsman turned to the Mayor of Sofia Municipality to inquire whether the municipal enterprise had sufficient capacity to handle the service and what specific measures the Sofia Municipality planned to implement to permanently resolve the issue. In order to protect the right of residents in the affected districts to a healthy and favourable environment, she made specific recommendations.

Administrative Services

In response to reports from citizens that, despite having renounced their inheritance, their names still appeared on the certificate of heirs of their deceased relatives, the Ombudsman contacted the Minister of Regional Development and Public Works who issued instructions on how to properly complete the certificate. The instructions were provided to the National Association of Municipalities in the Republic of Bulgaria with a request that they be distributed to municipal administrations.

The Ombudsman recommended that the Minister of the Interior take the necessary steps to ensure compliance with the procedure provided for in Article 105, para 3 of the Road Traffic Act when conducting inspections of vehicles with tinted windows – providing mobile technical equipment to test light transmittance so that, in the future, the rights of drivers would not be violated in such cases.



**CHAPTER ONE:
THE OMBUDSMAN
IN DEFENCE OF
THE CITIZENS'
RIGHTS**

I. THE OMBUDSMAN'S RECEPTION ROOM

Following the election of an Ombudsman and a Deputy Ombudsman in 2025, the practice of meeting with citizens at the institution's Reception Room was reinstated, as well as the practice of holding outreach meetings across the country. The successful reinstatement of the practice of personal contact between the Ombudsman and Deputy Ombudsman and citizens across the country was driven by the inability of people from small towns to speak in person with the Ombudsman and the Deputy Ombudsman. To this end, outreach Reception Rooms were organised and held in Dupnitsa (19 September 2025), Samokov (30 September 2025), Veliko Tarnovo and Gorna Oryahovitsa (3 October 2025), Petrich (9 October 2025), Gotse Delchev (10 October 2025), Mezdra (21 October 2025), Slivnitsa (9 December 2025) and Pernik (17 December 2025). During the meetings, a large number of citizens receive specific advice and clear guidance regarding the issues and problems they bring to the attention of the Ombudsman and the Deputy Ombudsman, while others, albeit smaller in number, receive timely assistance on site.



3 October, Gorna Oryahovitsa



9 October, Petrich



10 October, Gotse Delchev



21 October, Mezdra



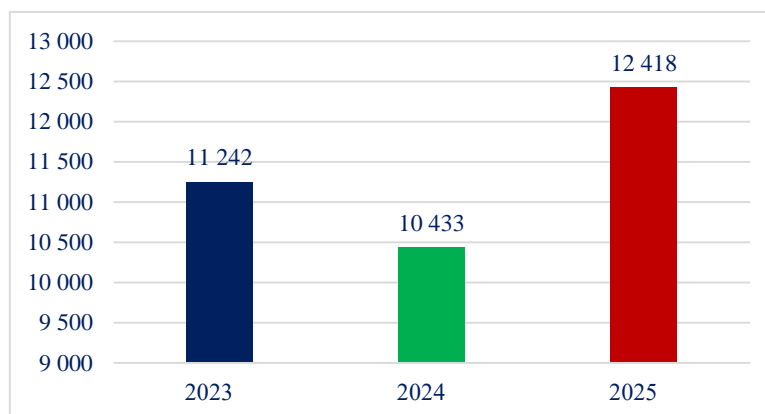
9 December, Slivnitsa



17 December, Pernik

Over the past year, 12 418 citizens sought assistance through the Ombudsman's Reception Room: an increase of 19.03% compared to 2024.

Figure No. 2 Number of citizens who sought assistance from the Ombudsman through the Reception Room for the period 2023-2025

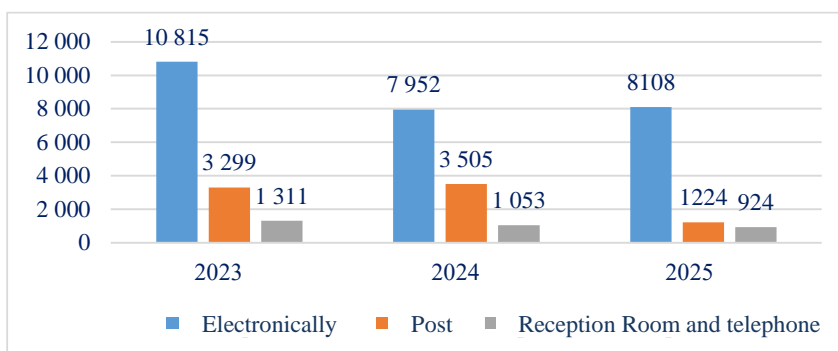


The matters raised typically concern the powers held by various authorities, including their administrations, regarding the protection of civil rights and freedoms.

Complaints received

10 256 complaints and signals were registered in 2025. The reputation of the institution in the exercise of its functions undoubtedly contributes to the timely resolution of the issues raised by citizens, particularly in their interactions with executive authorities, public service providers and various private-law entities.

Figure No. 3 Number of complaints and signals by manner of submission for the period 2023-2025



The preferred method of contacting the Ombudsman in 2025 is the electronic submission of complaints and signals. The online form on the institution's website makes it possible for this to be done quickly and easily; once the required information is entered, the submission is automatically registered – accounting for 32.56% of all submissions received. The share of registered complaints and signals submitted via email is 42.07%, while those received through the secure electronic delivery system account for 4.43%.

The number of complaints and signals submitted in person at the Ombudsman's Reception Room totalled 837, while 87 complaints were received by telephone, for which records of verbal complaints were drawn up. The latter method of contacting the Ombudsman is used less frequently, but it is practically important for people who, for one reason or another, are unable to submit a complaint in writing. The experts at the Reception Room are also responsible for registering complaints received electronically (priemna@ombudsman.bg).

Table No. 2 - % of complaints by category of violations for the period 2023-2025

CATEGORY OF VIOLATION	2025	2024	2023
	%	%	%
Consumer rights	26,15	30,29	35,99
Social rights, healthcare and education	15,22	17,60	17,87
NPM and fundamental rights and freedoms	10,68	9,85	5,02
Right to property and economic freedom	9,17	11,29	9,30
Rights breached by private entities – loan and financial institutions, debt collection companies and private enforcement officers	9,09	6,52	5,80
Right to good administrative service	8,32	6,04	5,50
Rights of persons with disabilities	6,38	5,95	6,23
Rights of children	4,83	4,08	3,81

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Right to a clean environment	3,47	3,08	2,98
Other violations	2,85	3,00	5,43
Request for changes in the regulatory framework	1,65	0,77	0,73
Discrimination	0,84	0,56	0,36
Request for referral to the Constitutional Court	0,55	0,41	0,66
Protection of whistleblowers	0,51	0,32	-
Request for an interpretative judgment	0,16	0,12	0,06
Absence of a specific violation	0	0,12	0,26
Total %:	100	100	100

The Ombudsman's intervention in matters of significant public interest has generated a significant response, as evidenced by the collective complaints and signals, petitions and signatures received, which totalled 114 over the past year. **The civic groups that sought assistance regarding the protection of their rights represent 63 440 people, an increase of 118.30% compared to 2024 (29 061 people).** The issues raised stem from the actions of government and municipal authorities, as well as from those of entities entrusted with the provision of public services.

In 2025 as well, the largest share of all registered complaints and signals concerned violations of consumer rights – 26.15%, followed by those concerning healthcare, education and social rights – 15.22%, while third place went to complaints related to the National Preventive Mechanism and fundamental human rights and freedoms – 10.68%.

In 2025, 37 complaints and signals were received from foreign nationals. Over time, the trust of such individuals in the Ombudsman has grown, while the range of nationalities has become more diverse: Armenia, Germany, India, Iraq, Iran, Spain, Canada, Nigeria, Poland, North Macedonia, Russia, Syria, Suriname, Serbia, Tunisia, Turkey, Uzbekistan, Ukraine, France, Haiti, the Czech Republic, and others. The largest share of complaints was sent by Ukrainian citizens (24.32%) due to the situation with Russia.

Completed inspections upon complaints and signals

The total number of complaints and signals completed in 2025 was 9 196, where, in the largest share of them – 78.09%, the Ombudsman issued recommendations and expressed opinions. In second place are those for which the Ombudsman provided advice and intermediation – 18.18%, and, in third place, are those for which she explained her legal powers – 3.73%.

Table No. Number and % of completed complaint and signals in 2025 based on the actions taken by the Ombudsman

Actions taken	Number	%
Upon complaints and signals within the powers of the Ombudsman (admissible) of which:	8 853	96,27
– Recommendations sent	1 678	18,25
– Opinions expressed	5 503	59,84
– Advice given	914	9,94
– Intermediation carried out	758	8,24
Upon complaints and signals outside the powers of the Ombudsman (inadmissible):	343	3,73
Total:	9 196	100

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It is only natural that the number of resolved admissible complaints and signals is higher, as the role and activities of the Ombudsman are becoming increasingly recognised by the public. Contact with the experts at the Reception Room further helps ensure that the issues and problems raised in the complaints and signals are presented accurately and clearly.

Table No. 4 % complaints and signals by manner of completion for the period 2023-2025

Complaints and signals completed	2023	2024	2025
Admissible	99	98	97
– Recommendations	22,11	18	18,25
– Opinions	67,14	66	60
– Advice	5,58	7,60	10
– Intermediation	4,17	6,47	8,25
Inadmissible	1	2	3
Total:	100	100	100

Recommendations are an important tool used by the Ombudsman when reviewing complaints and signals; in 2025, there was a slight increase of 0.21% compared to those issued in 2024. In 75% of cases, the recommendations were fully or partially taken into account by the relevant government and municipal authorities, public service providers and private entities.

It is worth mentioning that, for yet another year, the number of complaints and signals resolved through intermediation increased. There has also been an increase in the number of cases where advice was provided.

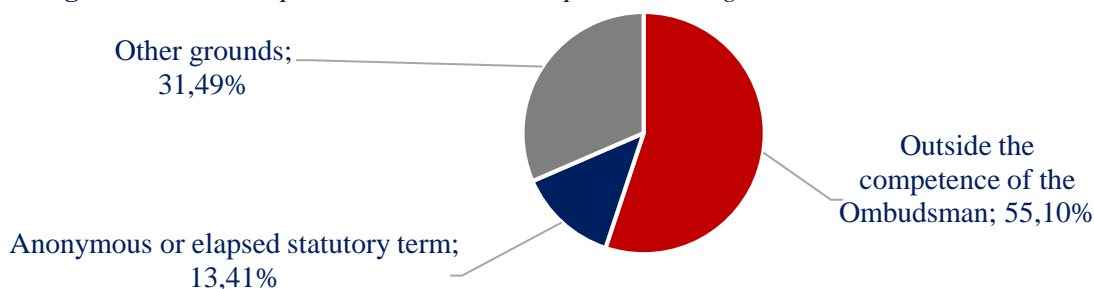
Table No. 5 Number of complaints and signals completed in 2025 by offenders

Offender	Number	%
Government authorities and their administrations	3 801	41,33
Persons entrusted to provide public services	2 997	32,59
Municipals authorities and their administrations	1 645	17,89
Private entities	753	8,19
Total:	9 196	100

Last year, the largest number of resolved complaints and signals involved government authorities and their administrations – 3 801, while the smallest number involved various private entities – 753.

Overall, the figures for resolved complaints and signals in 2025 compared to those in 2024 regarding individual offenders remain consistent. The pace at which the Ombudsman institution responds to each individual or collective case is sufficiently indicative of the right direction in promoting and protecting human rights and fundamental freedoms.

Figure No. 4 % completed inadmissible complaints and signals in 2025



The lack of legal grounds to review inadmissible complaints and signals does not prevent the citizens from receiving detailed explanations regarding the Ombudsman's powers in order to enable them to make an informed choice regarding the future protection of their rights and freedoms. Furthermore, the advice provided offers various options for action in this regard.

II. RIGHTS OF CONSUMERS

In 2025, the institution received 3 109 complaints from users of public services, accounting for 30.31% of the total number of complaints that year.

First come the complaints in the heating sector, followed by complaints against WSS operators, mobile operators, banks and so on. The main issues emerging from the complaints of public service users are poor/unsatisfactory service quality and, consequently, the lack of compensation, as well as high and incomprehensible bills.

For yet another year, the problems with monopolies remain unresolved and are even deteriorating – poor-quality services and, in these cases, a lack of effective and functional mechanisms for paying lower prices or penalties, and incomprehensible bills. In their dealings with public service providers, citizens continue to feel unprotected.

Table No. 6 Number of signals and complaints from consumers by sectors for 2023-2025

Sector	2023	2024	2025
Heat supply	728	291	721
WSS	1 481	1153	599
Electronic communication services	621	525	456
Financial services	334	325	388
Electricity supply	1 702	1237	342
Transportation services	290	197	108
Waste collection	81	38	64
Postal services	19	88	58
Debt collection companies	63	41	39
Insurance services	45	38	35
Gas supply	35	5	7
Other consumer disputes	295	216	292

In 2025, inspections were completed for 2750 cases, of which 857 involved confirmed violations, 1668 involved no confirmed violations and 225 were deemed inadmissible.

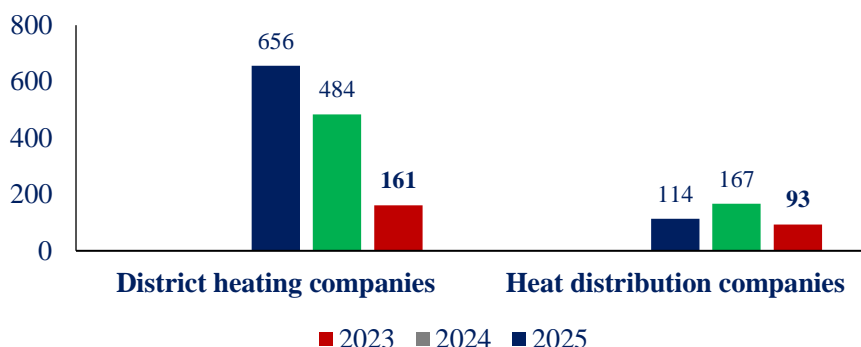
1. HEAT SUPPLY

In 2025, 721 complaints and signals regarding heat supply issues were received, which is a 148% increase compared to 2024. Investigations into 649 cases were completed.

The Ombudsman received the most complaints against district heating companies regarding Toplofikatsiya Sofia EAD – 538, followed by Toplofikatsiya – Pernik AD – 17, EVN Bulgaria Toplofikatsiya EAD – 5, Toplofikatsiya – Burgas AD – 2, Veolia Energy EAD – 1, and Toplofikatsiya – Razgrad AD – 1.

Among heat cost allocation companies (HCACs), the most complaints were submitted against Techem Services EOOD – 47, followed by Dalsia OOD – 33, Nelbo AD – 17, Direct EOOD – 12, Thermocomplect OOD – 3, Belchevstroy EOOD – 1, and Toplocontrol OOD – 1 (currently a deregistered trader).

Figure No. 5 Number of complaints and signals against district heating companies and heat cost allocation companies for the period 2023-2025



The significant increase in complaints in the sector is due, on the one hand, to the rise in regulated heating prices effective 1 July 2025, and, on the other hand, to the malfunctions in the district heating network in Sofia which lead to unscheduled interruptions in heat supply. **In 2025, citizens continued to insist on a review of the method for calculating the heat energy emitted by building installations, as well as on its proper allocation among property owners in condominium buildings.**

Right to pay an economically justified price

As part of the procedure for accepting companies' applications for changes in energy prices and their publication by the EWRC, the Ombudsman institution called for compliance with Article 15, para 2 of the Energy Act (EA) and an end to the practice of redacting price proposals and financial data essential to pricing from the applications on the grounds of protecting trade and/or commercial secrets.

Citizens also drew the Ombudsman's attention to the issue of **the high prices of new heat cost allocators with remote reading**, with which heated homes must be equipped, in accordance with the legal provisions, by 1 January 2027. Furthermore, **the new devices were sold with the shortest possible warranty period – 2 years**. They insisted that the executive branch should explore opportunities for financial support, at least for the most vulnerable groups, to purchase the new heat cost allocation devices using resources from European funds – a proposal made by the Ombudsman to the Minister of Energy as early as 2023.

Also on the agenda remains the Ombudsman's proposal to amend Article 30, para 1 of the Energy Act, under which the prices of the heat energy allocation service paid by customers would also be subject to regulation by the EWRC.

Over the years, the repeated increases in the price of the heat cost allocation service have caused justified dissatisfaction among consumers due to the **lack of transparency as to how it is set**. For example, it is unclear what economically justified costs underlie the increase in the service fee per customer. The heat cost allocation companies do not publicly announce their decision to change the price, so the citizens have no opportunity to familiarise themselves with their reasoning for doing so in advance. **This fee is also paid by consumers who use a paid service for monthly remote meter reading throughout the year.**

Right to pay for services actually rendered

The Ombudsman institution submitted a reasoned opinion to the Minister of Energy opposing the text put up for public discussion of § 2 of the Draft Ordinance to Amend and Supplement the Heat Supply Ordinance, pursuant to which the amount of thermal energy emitted by the building system is set at 30 per cent of the total thermal energy used for heating in condominium buildings. The Ombudsman emphasized the lack of analysis and justification for this method of determination and insisted on a professional and in-depth analysis to ensure a transparent, accurate and fair determination of the amount of thermal energy emitted by the building system.

Subsequently, the proposed text of § 2 was withdrawn.

In relation to the suspension of the application of the formula under Section 6.1.1 of the Methodology for the Proportional Allocation of Heat Energy in Condominium Buildings, as an annex to Article 61, para 1 of the Heat Supply Ordinance (Ruling in administrative case No. 6870/2025 of the

Supreme Administrative Court), effective as of 12 September 2025, the Ombudsman repeatedly reached out to the Minister of Energy to inquire about what urgent measures were planned to address the legal vacuum.

Right to quality services

In 2025, the institution received numerous complaints regarding a malfunction in a heat supply pipeline on the main branch of the Student City mainline announced on 10 February by Toplofikatsiya Sofia EAD and the temporary suspension of hot water and heating in the residential complexes of Mladost-1, Student City, Darvenitsa, Vitosha and Malinova Dolina. Toplofikatsiya Sofia EAD scheduled for early September 2025 major planned repairs of the Sofia Iztok [East] Thermal Power Plant and annual maintenance of the heat distribution network, accompanied by a suspension of the heat supply in a large part of the capital: the residential complexes of Hristo Smirnenski, Geo Milev, Iztok, Izgrev, Dianabad, Mladost 1, 1A, 2, 3, 4, Musagenitsa, Poligona, Studentski City, Vitosha, Malinova Dolina, Darvenitsa, Druzhba 1 and 2, Hladilnika, part of Lozenets and part of Yavorov.

Given the unprecedented scale and duration of the repairs in Druzhba-2 – a 90-day period announced by Toplofikatsiya Sofia EAD at the start of the heating season, the Ombudsman insisted that the competent authorities conduct inspections. She highlighted the company's inaction during the non-heating summer period which made it necessary to repair the damaged pipelines at the most inconvenient time for both customers and the repair works themselves. Subsequently, Toplofikatsiya Sofia EAD revised its plan to cut off the hot water and heating for thousands of households in the Druzhba-2 residential complex. It re-organized its work and drew up a new schedule under which, for most residential buildings, the suspension of the heat supply was limited to 14-16 days.

In 2025, citizens also reported leaks from facilities owned by Toplofikatsiya Sofia EAD that were not repaired within the specified 48-hour period; in some cases, this led to flooding of basements and load-bearing walls in residential buildings for months on end. In such cases, the Ombudsman immediately turned to the company with recommendations to repair the leaks as soon as possible.

There were also signals of insufficient hot water and poor heating in the condominium buildings. Following recommendations from the Ombudsman, Toplofikatsiya Sofia EAD made the necessary adjustments to the service stations and replaced damaged equipment for which, prior to the Ombudsman's intervention, consumers had been waiting for weeks and months.

In connection with the poor quality of heating services, the Ombudsman found the following:

1. The regulatory framework does not protect consumers in the event of a decline in the quality of heating services. In the event of insufficient hot water supply or inadequate heating, no compensation is provided to affected customers, nor are there any penalties imposed on the company for delays in resolving the issue.

2. The regulatory framework does not protect consumers in cases where the district heating company announces frequent emergency shutdowns of the heat supply in the same condominium building due to obsolete heating equipment. Without penalties or default payments for its customers, Toplofikatsiya Sofia EAD postpones major repairs, extends deadlines for fixing breakdowns, or fails to repair leaks that flood building foundations. The provisions of Article 73 of the Energy Act regulate the cases in which operators of electricity transmission, heat transmission, gas transmission, and the respective distribution networks may order the interruption or restriction of energy/natural gas production or supply without prior notice (para. 1). The duration of the interruption or restriction may not exceed 48 hours (para. 3). However, liability for an interruption or restriction lasting more than a total of 48 hours over a 72-hour period is provided only for operators of electricity transmission and distribution networks (para. 4).

3. There is no timely control and penalties for the failure to comply with the obligation to restore the land and surfaces damaged during excavation and repair work on the district heating network.

Right to information

Signals were submitted about the lack of timely and clear information from district heating companies and the heat cost allocation companies regarding the calculation of heating bills, such as:

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- Failure to deliver paper copies of invoices and adjustment statements to the mailboxes of households with district heating. This problem is particularly significant for elderly customers who do not use the internet; there is no control;

- Customers with outstanding heating bills do not receive timely and complete information about legal proceedings filed against them;

- Toplofikatsiya Sofia EAD provides a statement of accrued charges and payments made only for the past five years, yet, at the same time, it is pursuing older customer debts through legal action.

In this regard, following the Ombudsman's recommendations, there has been an improvement in customer service.

Right to access to the service

In early October 2025, as the weather turned colder, citizens sought assistance from the Ombudsman to ensure that Toplofikatsiya Sofia EAD turned on the central heating in a timely manner.

Complaints were also received regarding delays in connecting to the district heating network. The most common causes of such delays, as identified during inspections, are the procedures to obtain approval of the investment from the Sofia City Council and to select a contractor for the project under the Public Procurement Act.

Main recommendations:

1. Introduce a new and fair method to determine the amount of thermal energy emitted by the building system in condominium buildings;
2. Carry out a comprehensive review of the regulatory framework in the Heat Supply sector and the General Terms and Conditions for the Sale of Heat Energy for Residential Use in order to protect effectively the consumers' rights to a quality and uninterrupted service;
3. Perform a follow-up impact assessment of Ordinance No. E-RD-04-1/12 March 2020 on Heat Supply – review of the consequences of its implementation over a period of more than 5 years;
4. Amend Article 73, para 4 of the Energy Act, in accordance with para 3, requiring heat distribution network operators pay affected end customers compensation for any interruption or restriction of heat supply lasting more than 48 hours within a 72-hour period;
5. Regulate the prices of the heat energy distribution service.

2. WSS SERVICES

In 2025, the Ombudsman institution received 599 complaints. The inspections into 576 cases were completed. The Ombudsman received petitions from 3914 citizens.

As in previous years, the complaints regarding the poor quality of WSS services and the right of access came first (50.42%), followed by complaints regarding the payment for unused services, including the allocation of water costs for “general consumption” in condominium buildings (15.69%), followed by complaints about violations of the right to accurate metering and billing (12.19%), etc.

The right to a quality water supply service and to access to the service

272 complaints were received regarding violations of the right to quality water supply services and access, accounting for 45.41% of all complaints in the WSS sector. The majority of these complaints came from the regions of Pernik, Pleven, Varna, Sofia Region and Kyustendil.

The consumers' complaints concerned frequent and prolonged water outages, failure to adhere to announced water rationing schedules, low water pressure, delays in repairing service disruptions, failure to provide alternative water supplies, including water trucks, during outages lasting more than 12 hours, and other issues.

In mid-August 2025, dozens of complaints were received from residents of the city of Pleven and villages in the municipality of Pleven regarding the imposition of strict water rationing – three hours in the morning and three hours in the afternoon. The Ombudsman immediately reached out to the Minister of Regional Development and Public Works with a recommendation to announce a plan to

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address the water crisis in Pleven, including urgent and long-term measures to resolve it, with specific deadlines, including ensuring drinking water for the affected population.

For yet another year, it is obvious that the current Ordinance No. 4 on the Terms and Procedure to Connecting Consumers and to Use WSS Systems (Ordinance No. 4) blurs the lines of responsibility between WSS operators and municipal administrations regarding the provision of drinking water to the population, regardless of the reason for the interruption, as well as regarding the implementation of water rationing measures.

Pursuant to § 6 of the Transitional and Final Provisions of Ordinance No. 4, in a letter of 15 August 2025, the Ombudsman issued a recommendation to the Minister of Regional Development and Public Works to provide written instructions to WSS operators and municipalities regarding the implementation of Article 41, para 6. To date, the Ombudsman has not been informed of the Minister's position or of any actions taken in response to the recommendation.

In 2025, complaints were submitted regarding:

- Due to low water pressure in the following areas: Plovdiv, Komatevo District; Botevgrad; Veliki Preslav; Rakitovo; Radomir; Dryanovo; Elin Pelin; Kaspichan; Pernik, Tsarkva District; Zlatitsa; the village of Ichera, Sliven Region; the village of Rozovo, Stara Zagora Region;

- Poor water quality (colour, odour, turbidity, taste, coliforms, E. coli) from: the city of Shumen; the town of Simeonovgrad; the city of Dupnitsa; the villages of Vasil Levski and Topolovo, Plovdiv Region; the village of Gaberovo, Burgas Region; the town of Breznik; the village of Kran, Stara Zagora Region; the town of Cherven Bryag; the villages of Kokalyane and Zhiten, Sofia Region; the village of Gaitanite, Gabrovo Region; the village of Kozlovets, Veliko Tarnovo Region; the village of Dolno Kamartsi, Sofia Region; the village of Velkovtsi, Pernik Region.

In January 2025, the Shumen Regional Health Inspectorate (RHI) announced that the water used to supply the city of Shumen, the town of Veliki Preslav and the villages of Panayot Volovo, Belokopitovo and Dibich from the Ticha Reservoir had high turbidity levels and recommended that it not be used for drinking purposes. The Ombudsman institution received dozens of complaints from residents of Shumen who asked why they had to pay for water at a rate set for drinking and residential use when it did not meet legal requirements. The Ombudsman institution contacted WSS Shumen with a request to reduce the water service rates for the period during which the consumers in the affected areas received water unfit for drinking. **The Managing Director of the WSS operator responded that, pursuant to Article 14, para 2 of the Regulation of Water Supply and Sewerage Services Act (RWSSSA), the operator was obligated to apply a uniform price for served territory.**

In response to petitions from residents of the town of Breznik, the Ombudsman turned to the Managing Director of WSS Pernik with a recommendation not to charge fees for the water supply service to the affected population or to reduce the price of the WSS service, pursuant to Article 31, para 2 of the General Terms and Conditions for the Provision of WSS Services to Consumers by WSS Pernik, as it did not meet the requirements of Ordinance No. 9/2001 on the Quality of Water Intended for Drinking and Residential Use (Ordinance No. 9). The recommendation was not implemented and the Managing Director of WSS Pernik cited the following reasons: extraordinary expenses to provide water to residents in the town of Breznik (12 water trucks in the town); transportation costs; the company incurred direct financial losses because the population did not have direct access to water for drinking and residential use.

Pursuant to Article 8, para 1, item 3 of Ordinance No. 4, the liability of the WSS operator for the failure to fulfill its obligations is set out in the general terms and conditions for receiving WSS services. Article 52 of the General Terms and Conditions for the provision of WSS services (GTC), approved by the EWRC, provides for an obligation of the WSS operators to pay penalties amounting to 10% of the value of the services billed for the previous month, upon request by the consumer within 30 days of the date of the failure of the WSS operator to fulfill its obligation.

The Ombudsman is of the opinion that the amount of the penalty is extremely small compared to the extraordinary expenses households are forced to incur to obtain water. Furthermore, the penalty should be paid without the need for a written request to the WSS operator. The inspections into citizens' complaints regarding the poor quality of the water supply service lead to the conclusion that the current regulatory framework does not protect effectively the

consumers' rights when they do not receive a quality water supply service, including if the water quality does not meet the requirements of Ordinance No. 9.

Right to pay for WSS services actually used

In 2025, there was an increase in the complaints about the **payment for unused services**, including unfair allocation of “total consumption” water charges in the condominium buildings. In 2024, these complaints accounted for 12% of all complaints, and in 2025, they were 15.69%. In such cases, the Ombudsman conducts inspections to verify compliance with the requirements of Ordinance No. 4 and the General Terms and Conditions. The Ombudsman is of the opinion that **Ordinance No. 4 does not provide for fair and effective mechanisms to protect the rights of compliant consumers in the allocation of “total consumption” water volumes**. There are no provisions for liability of WSS operators in the event of failure to fulfill their obligations related to: meter reading; issuing notices to consumers in cases of unchecked individual water meters and, accordingly, in the event of failure to comply within the deadline, charging them ex officio water quantities based on the number of occupants; setting a date for meter readings once a year outside the working hours of the WSS operator, etc. On the other hand, **the regulatory framework does not provide for institutional control of the compliance with these obligations by WSS operators**.

Main recommendations:

Adopt a new Water Supply and Sanitation Act which will:

- Guarantee the right of consumers to access WSS services at an economically justified price which is linked to the way water is supplied and to the fulfilment of quality indicators;
- Provide for a prompt and clear procedure to apply a lower price for water when it does not meet the statutory quality requirements;
- Envisage the payment of water allowances to socially disadvantaged and vulnerable consumers;
- Introduce effective institutional control over the activities of WSS operators;
- Determine the social affordability of the price of WSS services based on reliable data and in view of household income;
- Introduce a new and fairer way of allocating water quantities for “total consumption”;
- Introduce clear rules for the institution of a water supply regime and its enforcement, ensuring the right of consumers to receive a quality alternative water supply;
- Ensure simultaneous reading of common and individual cold and hot water meters, including via remote reporting;
- Provide for a prompt and simplified procedure for consumers to receive compensation from WSS operators if they fail to provide quality WSS services.

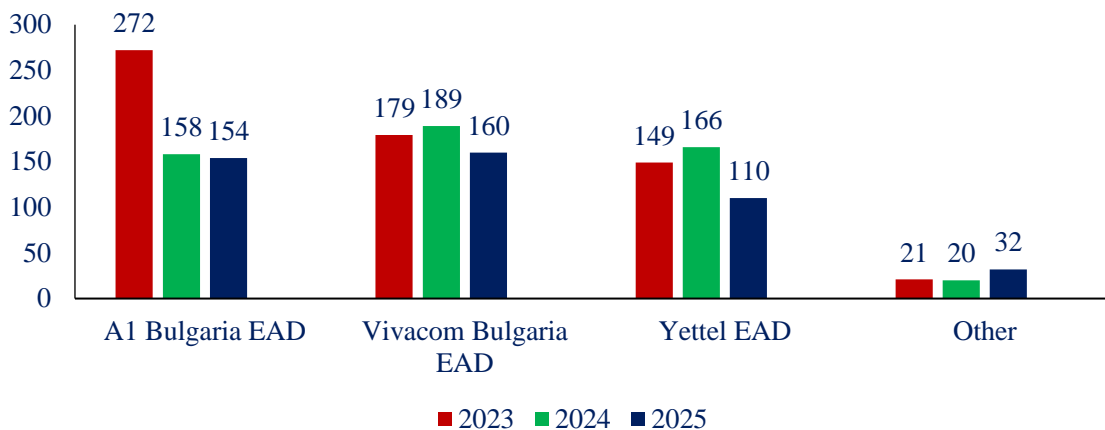
3. ELECTRONIC COMMUNICATION SERVICES

In 2025, 456 complaints were filed regarding the provision of telephone, internet and television services, and the inspections into these complaints were completed. There is a noticeable downward trend in complaints against electronic communications service providers. 121 citizens submitted petitions to the Ombudsman.

The highest number of complaints were filed against Vivacom Bulgaria EAD – 160, followed by A1 Bulgaria EAD – 154, and Yettel Bulgaria EAD – 110.

The citizens complained mainly about violations of their right to information, their right to pay only for services they actually used, their right to receive quality services.

Figure No. 6 *Number of inspections completed against suppliers of electronic communication services for the period 2023-2025*



Right to information

In 2025, 114 complaints were filed, with the most common complaint being about signing contracts with mobile operators on electronic displays. The citizens claim that they are only shown a signature field without being given the opportunity to review the terms of the contracts. Furthermore, the information provided to them is misleading or incomplete, and they subsequently discover that services they did not consent to have been included.

Right to pay for services actually used

In 2025, 61 complaints were received regarding inflated bills, with the main complaints relating to the billing of roaming services in border areas, the charging of a standard monthly fee after the contract term expired, and subscriptions to value-added services. Regarding the billing of roaming services in border areas, the inspections revealed that the citizens had been informed in advance that they were connected to a foreign operator's network. In some cases, without specifying a specific reason, operators reversed these charges.

It is important to note that the Communications Regulation Commission has developed a mechanism to limit instances of inadvertent roaming within the territory of the Republic of Bulgaria through the ROAMING PROTECT BG mobile app. The mobile app alerts users and collects information on areas where inadvertent roaming has been detected.

Right to a quality service

53 complaints were received regarding poor service quality, including unsatisfactory or inadequate coverage in certain smaller towns across the country, as well as interruptions or outages in television and/or internet service due to technical failures.

The inspections conducted revealed that these issues were most often caused by cable damage and malicious acts by third parties. The services were restored within the timeframe specified in the Terms and Conditions of the operators.

Mobile operators emphasise that they are required to provide a certain percentage of network coverage based on "population" rather than "territory". Signal quality also depends on weather conditions, the presence of physical obstacles and the terrain.

Main recommendations:

1. Provide clear pre-contractual information about the terms and prices of the rate plans;
2. Effective control of the quality of provision of electronic communications services.

4. FINANCIAL SERVICES

In 2025, the institution received 388 complaints regarding financial services, of which 246 were against banks and 142 against fast loan companies. An additional 227 people submitted a petition to the Ombudsman regarding the services provided by banks, and another 138 submitted a petition regarding fast loan companies. The number of complaints from consumers of financial services increased compared to 2024 when 334 complaints were submitted.

Banks

Consumers of financial services brought to the Ombudsman's attention issues related to: unauthorised bank transactions; frozen accounts due to an outdated customer profile; high bank fees; poor administrative service; refusal to grant a deferral payment plan for a loan agreement; lack of starter kits with euro coins.

By the end of 2025, the Ombudsman received complaints from citizens regarding their inability to purchase starter kits with euro coins due to: a shortage of these kits at some commercial banks; banks selling them only to their own customers; and the fact that they were sold only via non-cash transactions and cash payments were not accepted.

The Ombudsman brought these issues to the attention of the Bulgarian National Bank (BNB) in connection with the powers granted to it under BNB Ordinance No. 46 of 31 July 2025 on the initial supply and subsequent replenishment of euro banknotes, euro coins and starter kits of euro coins. The Ombudsman emphasised that banks should not impose restrictions on the sale of euro coin starter kits limiting them to their own customers and to cashless transactions only. A request was made for the BNB to take action, if necessary, to ensure the proper implementation of the established procedure.

Fast loan companies

In 2025, the institution received 142 complaints against fast loan companies. The most numerous complaints were against Easy Asset Management AD, City Cash OOD, Cash Point Bulgaria EOOD, Credi Yes OOD, Credidirect EOOD, My Credit EOOD.

The complaints related to: exerting psychological pressure on the debtor regarding loan repayment; the presence of unfair terms in fast loan agreements; the lack of clear and detailed pre-contractual information when entering into a contract; the refusal of a creditor to remove from the Central Credit Register (CCR) an obligation under a loan agreement that had been declared null and void by a court or due to the expiration of the statute of limitations; the refusal of a creditor to provide up-to-date information on the amount of the debt and a copy of the agreement; the refusal of a creditor to grant deferral.

Over the years, as well as in 2025, the highest number of complaints has been about aggressive debt collection practices by fast loan companies. The most common complaints are: incessant phone calls with threats at all hours of the day and night; visits to the debtor's home and workplace; phone calls to the borrower's relatives and friends. In each case, an inspection is conducted into the relevant fast loan company with a recommendation to cease any practices that border on illegality in debt collection. The Ombudsman advises citizens to contact the police and the prosecutor's office.

In 2025, the Ombudsman institution received a large number of complaints in which citizens reported that fast loan companies refused to provide them with a copy of the loan agreement and repayment schedule.

The loan agreement contains personal data that is being processed. This is why, pursuant to Article 15 (3) of the General Data Protection Regulation (GDPR), the data controller is required to provide a copy of the personal data currently being processed. The Court of Justice of the European Union ruled in the same vein in its judgment in Case C-487/21: "The right to obtain from the controller a copy of the personal data undergoing processing means that the data subject must be given a faithful and intelligible reproduction of all those data. That right entails the right to obtain copies of extracts from documents or even entire documents or extracts from databases which contain, inter alia, those data, if the provision of such a copy is essential in order to enable the data subject to exercise effectively the rights conferred on him or her by that regulation, bearing in mind that account must be taken, in that regard, of the rights and freedoms of others."

If a complaint is filed regarding a lender's failure to provide a loan agreement, the Ombudsman advises the citizens to request the agreement from the fast loan company pursuant to Article

15 (3) of the GDPR. In the event of a refusal, they should seek assistance from the Personal Data Protection Commission and the Commission for Consumer Protection.

Main recommendations:

1. Regulate the activities of fast loan companies;
2. Repeal the clause regarding the capitalisation of interest from the standard loan agreement for university students and doctoral candidates.

5. ELECTRICITY SUPPLY

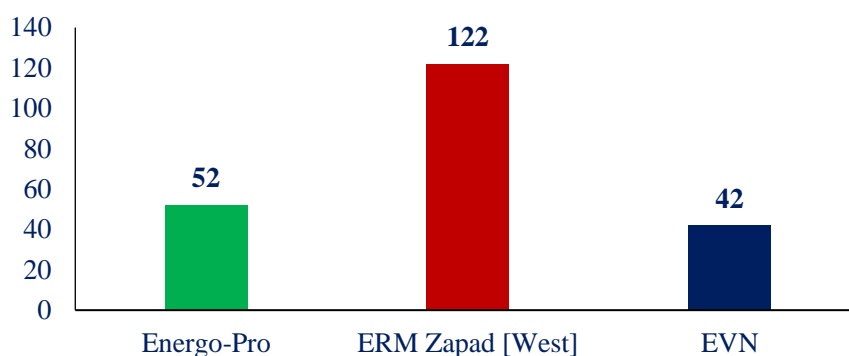
In 2025, 342 complaints were received concerning this sector and the inspections in 315 were completed; the complaints mainly concerned poor service quality and inflated electricity bills. A total of 909 additional citizens submitted petitions to the Ombudsman.

Right to a quality service

The main problem in the sector remains the poor service quality: frequent outages, low voltage, and network failures when weather conditions deteriorate.

The highest number of complaints came from residents of small places such as: the villages of Aydemir, Kalipetrovo, Srebarna, Vetren, Smilets, Bradvari, and Sratsimir, Silistra Municipality (license area of EPR Sever [North]); the village of Voden, Parvomay Municipality, the village of Sinitovo, Pazardzhik Municipality (license territory of ER Yug [South]); the town of Oryahovo, New America quarter, the town of Svoge, Drenov quarter, the village of Zgorigrad, and the village of Kazichene (license territory of EPM Zapad [West]).

Graph No. 7 *Number of complaints and signals against electricity companies for 2025*



Complaints accompanied by petitions were also submitted by the mayors of the municipalities of Glavinitsa, Anton and Koprivshitsa who sought assistance in resolving long-standing power supply issues in their respective areas. In this regard, the Ombudsman contacted the electricity distribution companies (EDCs) to request information regarding the condition of the networks in these specific localities, and where irregularities were identified, she issued recommendations for their effective and permanent resolution.

For yet another year, at the start of the winter season, communities were left without electricity. In response to the complaints received, the Ombudsman contacted ERM Zapad and ER Yug to request information regarding the causes of the power outages and to determine compensation for the affected consumers. She also insisted on an objective analysis of the extent to which the deteriorated quality of service was a result of: the condition of the power distribution networks; the lack of timely maintenance and repair of the facilities; the condition of the network right-of-way zones.

The Ombudsman observed that, to date, the control over the operations of EDCs regarding the quality of the electricity supplied had not yielded the necessary results – numerous communities continued to experience persistent problems with their electricity supply.

Following a specific inquiry from the Ombudsman institution regarding the results of the special inspection of the three EDCs due to power outages affecting a large number of customers in the period 21-31 December 2024 and in February 2025, the EWRC presented the findings of the inspection. They

indicated that the causes of the large number of outages and the insufficiently rapid resolution of these issues should be sought in the technical condition of the energy facilities and the actual readiness of the companies to operate in winter conditions. As a preventive measure, the EWRC required the EDCs to submit reports containing data on the current condition of the facilities and the planned actions to prevent similar serious outages.

Following the presentation of the reports, no additional information was disclosed about the conclusions reached, the instructions issued or the violations identified and sanctions imposed. This made it impossible to assess the extent to which the problems identified by the EWRC, which led to the high number of outages, were actually resolved. Pursuant to Article 6, para 4 of the Energy Act (new, State Gazette No. 67 of 2025), where necessary, mayors of municipalities shall submit proposals to the relevant operator of the electricity distribution network within the municipality's territory to include in their investment plans settlements or parts thereof experiencing problems with electricity supply. Upon receiving complaints from residents of areas with long-standing electricity supply problems, the Ombudsman will monitor the exercise of these rights by the mayors of the respective municipalities.

Billing at rates for economic customers with regard to customers who use electricity for residential purposes

The Ombudsman received complaints from customers EVN ES – non-profit legal entities and condominium associations – which used electricity for residential purposes at their premises, but starting in March 2025, following an inspection by the Customs Agency, EVN ES started billing them for consumption at industrial electricity rates. The company cited Article 4, item 51 of the Excise Duties and Tax Warehouses Act (EDTWA), according to which “residential use” refers to the consumption of electricity, liquefied petroleum gas (LPG) or natural gas by a natural person for their household.

The Ombudsman's position is that, in these cases, the Energy Act, which governs public relations related to the generation, import, export, transmission, distribution and storage of electricity, as well as electricity trading, is applicable to the customers of EVN ES and is to be applied accordingly. Within the meaning of § 1, item 2a of the Energy Act, a “residential customer” is a customer who purchases electricity or thermal energy using hot water or steam as a heat carrier for heating, air conditioning and hot water supply, or natural gas for their own residential needs.

As regards the concept of a “residential customer” within the meaning of the Energy Act, the Ombudsman has repeatedly emphasised that a customer's status as residential or non-residential is to be determined by the purpose for which the electricity is purchased, regardless of whether the customer is a natural person or a legal entity, or the type of facility.

The case-law also supports this view: judgment No. 273 of 6 October 6 2014 in civil case No. 693/2014 of the Supreme Court of Cassation states: “Based on the primary legal criterion – the purposes for which electricity is used/purchased, – non-profit legal entities (associations and foundations) that do not engage in any economic activity and are not funded by the government or municipal budget are to be classified as “electricity consumers for residential purposes” during the period of validity of the definitive provisions of items 42 and 43 (as amended by State Gazette No. 74/2006, now repealed) of § 1 of the Additional Provisions of the Energy Act.”

In order to protect the rights of electricity consumers, the Ombudsman turned to the Minister of Energy and the Minister of Finance as per their competence to provide an opinion on the application of § 1, item 2a of the Energy Act and Article 4, item 51 of the Excise Duties and Tax Warehouses Act, effective as of 17 July 2012, with respect to non-profit legal entities serving the public interest, associations registered under the Condominium Management Act and entities registered under the BULSTAT Act that use electricity for residential purposes at their premises, as well as regarding the need for an amendment or binding interpretation of the terms “residential purposes” and “residential customer” in the Excise Duties and Tax Warehouses Act and the Energy Act.

In response, the Minister of Energy stated that the classification of a person as a residential customer was not and could not be restricted based on the type of entity, including the legal distinction between natural persons and legal entities, as well as the further classification of the latter (based on the type of activity they carried out) into commercial, non-profit entities and such providing public services. For a person to have the status of a residential customer, it is sufficient that they purchase energy for residential purposes. The law does not require any other conditions for a person to have this status.

Main recommendations:

1. Amendment to the definition of “residential use” under Article 4, item 51 of the Excise Duties and Tax Warehouses Act in line with the definition of “residential customer” within the meaning of § 1, item 2a of the Energy Act;
2. The EWRC is to exercise effective control over the fulfilment of their obligations by EDCs to ensure the security of electricity supply;
3. EDCs are to improve the condition of electrical facilities and networks in areas with poor power supply service quality, provide timely preventive maintenance of facilities and maintain right-of-way zones in order to prevent widespread power outages in the event of deteriorating weather conditions.

6. TRANSPORTATION SERVICES

In 2025, the institution received 108 complaints related to transportation services. The highest number of complaints concerned the use of public transportation – 48, followed by complaints regarding intercity bus services – 38, rail transportation – 30, and air transportation – 21. Another 304 citizens submitted petitions to the Ombudsman.

A large portion of the complaints related to the strike by public transportation employees in the capital announced in May 2025 and the inability of passengers who had purchased travel passes to use the service they had paid for. Next were the complaints regarding the poor quality of transportation services, including failure to adhere to the published schedules for intercity buses, trains and public transportation vehicles.

In 27 complaints, violations of the law were found and recommendations were made to the competent authorities.

City transport

The highest number of complaints were filed against public transportation in the capital. Next were the complaints against City Transport – Varna EAD regarding misconduct by bus drivers and the failure to adhere to the published schedule.

In response to complaints received regarding the announced strike by public transportation employees in Sofia, the Ombudsman institution turned to the Mayor of Sofia with the following proposals to mitigate some of the consequences of the strike, which would, to a certain extent, compensate for the lack of ground transportation:

- All public transportation passes to be automatically extended for the duration of the strike, without requiring citizens to take any action to do so. **The recommendation was implemented by Sofia Municipality;**
- No fines to be imposed for violations of the ban on driving in bus lanes during the strike;
- The parking tickets issued in the blue and green zones to be voided. Sofia Municipality raised objections.

Inspections were carried out into signals of violations committed by public bus drivers and schedule non-compliance and recommendations were made to take appropriate action in cases where violations were identified.

Intercity passenger bus transport

The highest number of complaints from residents were regarding the lack of convenient bus service to small towns and villages (complaints from residents of the villages of Golemo Malovo, Rayanovtsi, Malo Malovo, Vasilovtsi, Tsraklevtsi, Chiren, Tri Kladenci, Devene). Unable to travel to nearby towns, residents are unable to receive timely medical and administrative services.

In this regard, the Public Advocate issued recommendations to local authorities to explore ways to provide accessible and convenient public transportation.

In 2025, the institution also received reports of non-compliance with published schedules by companies providing public bus transportation. In response to the complaints received, the Ombudsman issued recommendations to the Automobile Administration Executive Agency to conduct inspections and impose sanctions on carriers in cases of confirmed violations.

Air transport

In 2025, the complaints most frequently concerned: denied boarding; damaged or lost luggage; flight delays. In response to the complaints received, the Ombudsman advises citizens to contact the General Directorate of Civil Aviation Administration and the European Consumer Centre.

Railway transport

Most complaints concerned train delays, poor travel conditions, such as dirty train cars and malfunctioning air conditioning, as well as a schedule that did not take into account the passengers' work commitments.

In response to the complaints received, the Ombudsman issued recommendations to the state railway company BDZ: to improve passenger transport services and adhere to the current schedule; to adjust the current train schedules to accommodate passengers' work commitments.

Main recommendations:

1. Provide accessible and convenient public transportation for residents of small towns and villages;
2. Strengthen the control of public bus operators to ensure compliance with the approved schedule ;
3. Take measures to ensure proper hygiene and comfort on trains, intercity buses and public transportation vehicles;
4. Adhere to the published train schedule and tailored it to the passengers' work schedules.

7. WASTE COLLECTION

In 2025, the institution received 64 complaints regarding issues related to waste collection, including the billing of household waste fees. The inspections in 51 cases were concluded. **For yet another year, the highest number of complaints concerned the deteriorating quality of service.** Residents of various localities alerted the Ombudsman to persistent problems related to waste management – insufficient number of bins, irregular and infrequent service, unregulated disposal of household and construction waste, inadequate control by the responsible municipal authorities.

In response to the complaints received, the Ombudsman turned to the mayors of the relevant municipalities, recommending that they fulfill their legal responsibilities regarding waste management by taking measures to ensure a sufficient number of containers based on the residents' needs, regular collection of waste, monitoring activities, and so on.

In order to protect the right of the residents in the affected areas to a healthy and favourable environment, the following recommendations were made:

- Take all possible measures to increase the frequency of container service;
- Take immediate action to clean up public areas of uncollected waste in order to protect residents' health and prevent the problem from worsening.

As regards the partial exemption from payment of the waste collection fee for the period during which the affected individuals did not receive the service, the current legislation does not provide for such an option.

Complaints continued to be received regarding the **refusal of municipalities to accept/grant statements of exemption from the fee for household waste collection and removal services due to non-use of the property.** The most common reasons cited were: outstanding debts to the municipality; failure to submit documents from public utility providers certifying the lack of electricity and water usage at the property.

The grounds cited are inconsistent with the current legislation.

Pursuant to Article 71, item of the Local Taxes and Fees Act, no fee shall be collected for the service of collecting and transporting household waste to facilities and installations for its treatment, or for the activity of treating household waste, when the property is not used throughout the year and a statement has been submitted in the form and manner specified by the ordinance under Article 9 by the liable person by 31 October of the preceding year to the municipality where the property is located. **In this regard, the Ombudsman issued recommendations to local government authorities to cease this unlawful practice and to repeal provisions** in subordinate legislation that introduced those additional requirements contrary to the Local Taxes and Fees Act.

There were also complaints regarding the imposition of waste collection fees on properties located in areas without developed infrastructure which were not served by waste collection vehicles and lacked waste disposal bins.

Main recommendations:

1. Municipal administrations are to comply with the conditions for exemption from fees for household waste collection and removal services when a property is not in use, and not impose additional requirements not provided for by the law;
2. The competent municipal authorities are to ensure compliance with their statutory responsibilities regarding the organisation of household waste management, the provision of a sufficient number of waste containers and the conducting of monitoring activities.

8. POSTAL SERVICES

In 2025, the Ombudsman institution received 58 complaints against postal operators. The largest number of complaints were filed against Bulgarian Posts EAD – 23, followed by Econt Express AD – 13, and Speedy AD – 10.

The most common issues regarding postal services reported to the Ombudsman were: delayed/undelivered/misdirected post. In such cases, the Ombudsman conducted investigations and issued recommendations to improve the services to the citizens or advised the citizens to bring the issue to the attention of the Communications Regulation Commission which regulated the activities of postal operators; the recipient of a shipment did not receive notification that customs clearance was required for it. The Ombudsman brought this matter to the attention of the Communications Regulation Commission as it arose when a shipment was detained by the Customs Agency – if the recipient of the shipment did not check its status online, there was no way for them to know that it was detained; if they did check, they only saw that its status was “awaiting customs inspection.” A month or more would pass and, upon checking again, they would the same message and, in the worst-case scenario, the shipment had been returned to the sender.

Main recommendations:

1. Exercise effective control over the work of postal operators;
2. If a shipment is held at the Customs Agency, the carrier – Bulgarian Post or a courier service – is to notify the recipient that the shipment requires customs clearance.

9. DEBT COLLECTION COMPANIES

In 2025, 39 complaints were filed against debt collection agencies. The highest number of complaints were submitted against EOS Matrix EOOD, Debt Collection Agency EAD, Innovative Finance OOD, and Finance Pro Collect OOD. As in 2024, the citizens’ complaints primarily concerned the psychological harassment they were subjected to in connection with debt collection. During the inspections, the Ombudsman emphasized to representatives of the collection agencies that no unlawful methods should be used in debt collection. The Ombudsman requested that, in cases of identified violations, the necessary actions be taken to improve the debt collection practices.

The citizens are advised to contact the district police department of the Ministry of the Interior in their area of residence, as well as the district prosecutor’s office.

Main recommendations:

Regulate the activities of debt collection agencies.

III. RIGHT TO EDUCATION

In 2025, a total of 16 293 citizens turned to the Ombudsman with complaints and petitions regarding violations of their right to access to education.

The Ombudsman chose as a key focus of her work in 2025 the support for initiatives aimed at overcoming educational inequalities, creating opportunities for equal access to quality education for

children and young people, and improving their educational achievements. In her recommendations to the institutions, the Ombudsman noted the need for analyses, data and research to inform and clarify the direction of education policies.

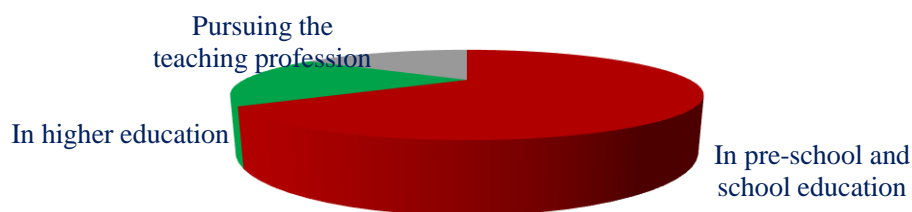
Over the past year, the focus in the pre-school sector remained on expanding the access to and retaining children in the system, providing language instruction to children for whom Bulgarian was not their native language and developing early language and social skills. In school education, the efforts were directed toward modernising the curriculum, intensifying the digitisation of the learning process and expanding the digital competencies of students and teachers, as well as supporting the teaching profession. In higher education, the efforts continued to optimise admissions, promote scientific research and advance the internationalisation of universities.

In 2025, a new model for the structure of school education was put up for discussion. Discussions were held by the Ministry of Education and Science (MES) to considering the introduction of a longer primary education stage, noting that Bulgaria was the only country in the European Union where primary education ended earliest (7th grade or at the age of 13–14) and an early entrance exam for secondary schools.

Throughout the year, the use of digital technologies, digital educational resources and innovative teaching methods expanded. The establishment of STEM centres in schools continued, with the aim of increasing the students' interest in natural sciences. Solutions based on artificial intelligence were introduced to personalise learning and improve assessment. The government made efforts and provided investments to improve the conditions in the education system. Investments in the modernisation of educational infrastructure were funded through the state budget and European programs, including those administered by the European Commission.

In 2025, the complaints and signals submitted by citizens, parent groups and civic organisations covered nearly the entire spectrum of issues and provided an opportunity for feedback and analysis of the effectiveness of the measures taken and the functioning of the education system.

Figure No. 9 *Number of complaints and signals in the area of education in 2025*



In defines of the citizens' rights, the Ombudsman issued 349 recommendations, opinions and pieces of advice. A total of 419 inspections into complaints and signals in the field of education were completed in 2025.

Pre-school education

A significant part of the complaints related to preschool education concerned the access to such education, the children's right to quality care and an appropriate educational environment. Other issues included the large number of children in a single group and the number of staff caring for them; the opportunities and conditions for physical activity; the closure of kindergartens in small towns with declining populations or populations consisting of vulnerable groups; prolonged renovations of nurseries and kindergartens and long-term suspension of renovations, as well as the associated inconveniences for children and parents.

A large portion of the complaints concerned the lack of sufficient vacancies in childcare facilities in Sofia Municipality and certain admission criteria, as well as the established zoning system. The Ombudsman institution has been raising awareness of this issue for years, turning to both district mayors

and Sofia Municipality with recommendations to designate sites for nurseries, kindergartens, and schools, and to create new vacancies in childcare facilities where they are insufficient, taking into account the development of certain districts, so as to meet the needs of working parents.

A serious problem identified through complaints from citizens of Varna concerned the implementation of the Ordinance on the Terms and Procedures for Enrolling, Withdrawing and Transferring Children in Municipal Kindergartens and Half-Day and Full-Day Preparatory Groups at Schools on the Territory of Varna Municipality. Parents expressed their outrage at having to spend the night in front of kindergartens when vacancies were announced in order to “secure their place,” “because the right of first come, first served guarantees the child’s enrolment.” This practice in Varna caused genuine bewilderment and outrage among citizens. In this regard, the Ombudsman issued a recommendation to the Mayor of Varna Municipality to reform the admission system so that it would facilitate the process for parents and ensure equality and transparency at all stages of the ranking and admission process for municipal nurseries and kindergartens.

The year 2025 also saw a **continued delay of several months in the payment of compensation to children who applied but were not accepted into municipal daycare centres and kindergartens** due to delays in the adoption of the 2025 state budget.

There were also continued complaints from parents regarding the practice of replacing teachers in kindergartens during the school year; parents expressed satisfaction with these teachers’ work and insisted that such teachers be allowed to see the children through to the end of pre-school education.

In 2025, the directors and staff of 219 independent daycare centres (IDCs) across the country turned to the National Ombudsman to express dissatisfaction with the reduced funding in the proposed 2025 State Budget Bill of the Republic of Bulgaria and the resulting conflict between medical professionals and educators in IDCs. In this regard, the National Ombudsman sent a recommendation to the Minister of Health and to the Chair of the Health Committee of the 51st National Assembly to consider the possibility of increasing funding for IDCs in accordance with the standards under the Healthcare function, in order to guarantee quality care for children and provide the IDC system with specialists and funds to ensure wage growth for those employed in paediatric healthcare.

Another serious problem in pre-school education was the difficulty to socialise children who did not speak Bulgarian. This is an issue on which the Ombudsman has repeatedly made recommendations to create conditions for intensive Bulgarian language instruction in kindergartens and pre-school groups for children for whom it is not their native language. The Ombudsman considers it important that language support be consistently regulated, that there be a clearly defined mechanism for allocating funds and that a separate component for “language support” be provided for children for whom Bulgarian is not their mother tongue, within the framework of the unified expenditure standard.

In related to amendments to the Pre-School and School Education Act, the Public Advocate proposes that the Transitional and Final Provisions of the Act explicitly stipulate and specify the method of funding for language support for students.

Main recommendations:

1. Modernise childcare facilities and build new ones to ensure high quality and accessibility, particularly in newly developed residential areas on the territory of Sofia Municipality.
2. Make efforts to ensure a high quality of service provided by childcare facilities.
3. Ensure the introduction of intensive Bulgarian language classes in kindergartens for children for whom Bulgarian is not their native language.
4. Providing better conditions for physical activity, sports and outdoor play for children.
5. Renovate and build playgrounds and outdoor sports facilities in kindergartens.
6. Take steps to train professionals to work with children in daycare centres.
7. Ensure an active dialogue and collaboration to build trust between parents and childcare staff.

School education

In 2025, steps were taken toward significant changes in school education. The National Ombudsman institution supports the efforts of the MES to reform the system in order to ensure equal access, quality education and an inclusive environment in schools for all children. In the

recommendations regarding changes to the system, the Ombudsman notes the need for analyses, data and research to inform and clarify the direction of educational policies.

In 2025 as well, the range of issues raised by citizens regarding secondary education remained wide and these complaints continued to be the highest in number.

A significant portion of the issues brought to the attention of the National Ombudsman concerned school management and the execution of the educational process: unacceptable behaviour by school headmasters; violations of procedures for conducting competitions for school headmaster positions; the selection of teachers in some schools across the country; the role of regional education authorities in providing methodological support to teachers and headmasters; the workload of teachers; the material and technical infrastructure of schools, the poor condition of school restrooms; the lack of gyms and sports fields in schools; sub-standard repairs in schools or delays in repair.

Other issues of concern to parents included the administration of the National External Assessment (NEA) exams, the two-shift school schedule and the long school day for students, teacher turnover during the school year due to teachers becoming eligible for retirement based on years of service and age, the prices, quality and criteria for selecting companies to provide school uniforms, as well as healthy eating at schools.

Issues that are well-known to the system but have remained unresolved for years were raised. Parents expressed their dissatisfaction with educational content that was difficult and inappropriate for the students' age, and the resulting heavy workload for children at school; insufficient free extracurricular activities in schools; the lack of opportunities to conduct physical education and sports classes properly due to poor facilities or such that do not meet the needs of the respective school; healthy nutrition for students; the inability to organise a single-shift schedule or full-day schooling for students in schools with a very large number of students; the low amount and availability of merit-based scholarships for students, as well as for gifted children.

One of the main problems was **early school leaving**. Solutions must be sought in expanding the access to education and improving the integration of minority children as steps toward reducing the rate of early school leaving and increasing literacy rates.

The proposed provisions of the Act to Amend and Supplement the Pre-School and School Education Act caused heated public debates in 2025, as well as numerous letters and complaints accompanied by petitions submitted to the Ombudsman institution. The proposed changes addressed many problematic areas in the field of education and sought to resolve issues that had remained unresolved for years. The topic of introducing a new subject, "Virtues and Religions," as a mandatory part of the curriculum sparked a broad public debate. In their complaints, citizens expressed concerns about ensuring the secular nature of education and instruction in schools; they were interested in how the rights of students of different faiths and those who were atheists would be protected; what the curricula for the subject would include in the various grades; and whether there were qualified teachers for this subject. In this regard, the Ombudsman noted that the introduction of a mandatory course titled "Virtues and Religions" without public consensus on the scope of the topics, the course content and the academic workload for students would only deepen the public division on the issue. The Ombudsman noted the need for an expert assessment to ensure a balanced introduction of topics on human rights and ethics in human relations. She pointed out the need for a comprehensive assessment of the students' level of knowledge about fundamental human rights, and in particular children's rights, as well as the need to integrate human rights issues into school education, particularly in light of societal divisions. She recommended that the subject remain an elective in schools and that it be introduced at the lower secondary level, with topics related to the secular nature of education and the age of the students.

Other complaints related to the intentions of the **MES to revise the intensive foreign language program in schools** and to introduce integrated National External Assessment exams for the 7th grade during the current 2025–2026 school year. In response to the complaints, the National Ombudsman insisted that admission of students after the 7th grade should not be tied to the need for private lessons for students and, consequently, to funding by parents. She found it important that the changes being made to the education system ensure that school instruction was sufficient to prepare students for the National External Assessment exams after the 7th grade. She also recommended that sample exam questions be published in a timely manner so that, at the start of the new school year, students, teachers and parents would have an idea of the necessary preparation. As a result of parental dissatisfaction and

prior to the final ruling of the Administrative Court on the matter, the MES revoked the changes to the National External Assessment and the 7th-grade exam for the current 2025/2026 school year would remain in its current form. **The Ombudsman reiterated the position that any changes in the education sector should provide opportunities for students rather than disadvantage them, and in this regard, it was important to ensure predictability regarding what is happening, for students as well as for parents and teachers.**

For yet another year, **the first-grade admission system for municipal schools in the capital once again sparked public outcry.** Parents expressed their dissatisfaction with the zoning system, under which children living near a particular school were not admitted to that school but were forced to attend another one far from their home address. Other issues raised by parents across the country concerned school renovations and were related both to missed deadlines for their completion and to the reassignment of children to schools that were far away or did not offer good conditions for learning.

The institution received many complaints in which **citizens requested that the requirement to present a secondary school diploma when applying for a driver's license be abolished.** In this regard, the Ombudsman noted that, pursuant to the amendments to the Road Traffic Act that took effect on 26 September 2017, a Class A1 driver's license was issued by the Ministry of Interior to a person who had reached the age of sixteen, had completed the 10th grade, had successfully passed the driver's exam and met the other legal requirements. As evident from the complaints, the practice established by the aforementioned Ordinance of not requiring a diploma upon enrolment in a driving course was misleading and created a false impression among applicants that a completed level of education was not required. Many of them only found out about the legal requirements when submitting the documents to obtain their driver's license. This created dissatisfaction and put them in the unpleasant situation of having paid for the training, completed the course and passed the exams, yet being unable to obtain a driver's license. In this regard, **the Ombudsman recommended to the Minister of Transport and Communications that the aforementioned Ordinance be amended so that, upon enrolling in a driving course, candidates were required to submit proof of a completed degree, in accordance with the requirements of the Road Traffic Act.**

Vocational education and training (VET)

In 2025, a number of steps were taken to modernise and improve the quality of vocational education, with the aim of enhancing its appeal and strengthening its connection to the labour market, in line with the needs of the country's regional economies. School facilities and classroom equipment were modernised, and modern teaching laboratories were built. The List of Occupations for Vocational Education and Training was updated and approved, effective as of 1 January 2026; new curricula and syllabi were developed; new educational standards and innovative approaches to teaching and learning were introduced; project-based learning was implemented.

At the same time, vocational education and training continued to face a number of challenges – ensuring its relevance to the labour market, a shortage of teachers, the development of curricula so that training would provide the necessary knowledge and skills in line with contemporary requirements and the challenges of new technologies; the quality of training and regional disparities in quality, low labour market placement rates for VET graduates, the need for stronger cooperation with the business sector, low participation of adults in training, and the quality of instruction in qualification courses at the Vocational Training Centres. There were also difficulties in finding companies interested in participating in the formation of dual training classes.

Many of the issues raised by citizens in their complaints related to **the participation of adults in the labour market in retraining and qualification courses and training programs in various vocational fields** at Vocational Training Centres (VTCs). Complaints were received regarding the validity of licenses issued by the National VET Agency to VTCs to conduct training. Questions were also raised about the quality of the training provided and the control of the activities carried out by these centres.

The problem of optimising the country's school network, resulting from demographic and migration trends, persisted. The consolidation and closure of schools sparked widespread public discontent and protests in some regions of the country. The Ombudsman recommended to local authorities that the restructuring or closure of municipal schools should be undertaken only after

discussing the issue with residents in the affected communities and ensuring their participation in discussions within the education committees of municipal councils and at municipal council meetings. The Ombudsman emphasised that, when closing a kindergarten or school, all circumstances related to the specific characteristics and needs of the area and the best interests of the children should be taken into account and the responsible institutions needed to assess those fairly, while making sure to provide transportation for children in compulsory education.

Matters related to the exercise of the teaching profession

A large number of issues were related to **dissatisfaction with school administration and poor management practices; the lack of transparency and clear criteria regarding the procedures for selecting teachers and educational specialists to fill advertised vacancies in schools and kindergartens**. There were also a lot of complaints about rude and unacceptable behaviour by school headmasters toward teachers and non-teaching staff, which deteriorated relationships and created a negative work atmosphere and tension among teams.

A large number of complaints submitted to the Ombudsman raises matters related to the conduct of competitions for the selection of headmasters of educational institutions; the lack of transparency in the selection of teachers; insufficient control over the work of headmasters. The denial of eligibility to participate in competitions for headmasters, the absence of clear criteria and the lack of feedback to ineligible candidates were also issues that caused dissatisfaction among citizens. In her recommendations, the Ombudsman insisted on ensuring conditions for the transparent and lawful conduct of the competitive procedure for filling the position of headmaster in accordance with Ordinance No. 16 of 1 July 2022 on the competitions for the position of headmaster in government and municipal institutions within the system of pre-school and school education.

The other problems which teachers encountered in their daily professional lives included the lack of financial discipline on the part of school headmasters across the country, unpaid wages for work performed on public holidays, the administrative burden on teachers, their working hours and the ineffective training for teachers. In complaints submitted to the institution, they also expressed their dissatisfaction with the low pay for lecture hours in schools, especially for guest lecturers. Some signals raised concerns about distrust in the Regional Education Offices (REOs), which, according to citizens, did not demonstrate the necessary objectivity and thoroughness in their work when conducting inspections. The lack of capacity among REO experts to provide methodological assistance to teachers was also noted, either due to the lack of practical experience or the lack of time. As evident from the complaints and signals submitted to the institution, another emerging problem was the lack of a system to monitor the professional development courses for teachers, which led to the fictitious qualifications. According to teachers and headmasters, the topics of the training courses were often not relevant and did not address the issues they faced in their daily work.

Higher education

The year 2025 saw continued efforts of the government to modernise higher education in Bulgaria. The current policies are aimed at greater accessibility, quality and competitiveness at the national and European levels, as well as alignment to the labour market through regulation of admissions and university funding to encourage fields with labour shortages, such as fields expected to face future labour shortages, including engineering and technical, natural sciences and mathematics, agricultural, and humanities disciplines. It is expected that university students in fields with labour shortages will be exempt from tuition fees.

In complaints submitted to the institution, university students expressed their disappointment with the high interest rate as a result of which they were unable to take advantage of student loans. The Ombudsman is of the opinion that a lower interest rate contributes to access to higher education for young people who are unable to secure the necessary funds on their own to pay tuition fees and cover the cost of their studies. The recommendations in the institution's Annual Reports are also in this vein. As regards the loans for university students and doctoral candidates, the National Ombudsman has repeatedly made recommendations over the years and has insisted on a reduction in the interest rate on loans for university students and doctoral candidates which stands at 7%. The amendments to the

University Student and Doctoral Student Loans Act of January 2026 which reduce the interest rate for university students and doctoral students to 3% are supported by the Ombudsman.

Another positive change is the reimbursement by the government of loans upon the birth or adoption of a second child by both parents, and banks will face penalties if they violate the framework agreement with universities. These changes were supported by the Members of Parliament and adopted by a large majority in the 51st National Assembly.

The Ombudsman supports increased funding for the higher education in order to encourage both faculty members and young people engaged in scientific research, and to improve the effectiveness and quality of the higher education. Over the years, the Ombudsman has advocated for increased funding for research activities as well as for regular adjustments to the amount of doctoral student scholarships. However, the lack of sufficient funds for capital expenditures at state universities places them in a difficult situation..

Despite the progress made, the higher education in the country still faces a number of challenges. In their complaints to the National Ombudsman, the citizens raised issues related to the quality of education at universities, the filling of academic positions, and the funding of specific fields within higher education; the development of scientific activity and research; poor living conditions in student dormitories; problems with the selection of academic advisors and evaluation committees in promotion procedures. They expressed dissatisfaction with administrative services, as well as with the high administrative fees for requests for academic transcripts or official letters. A wave of outrage erupted yet again this year due to the drastic increase in tuition fees for a number of subjects, both for private and state-funded programs.

Complaints submitted by citizens to the National Ombudsman also raised matters related to the filling of academic positions and the related competitions, as well as the professional competence of members of academic selection committees. Citizens expressed dissatisfaction with the lack of universally applicable criteria for the scientific achievements necessary to obtain a degree and fill an academic position, the lack of sufficient control over in the procedures to obtain a degree and violations of procedures to occupy academic positions. Questions were also raised regarding the preparation of documents for the procedures related to the career advancement of academic staff.

Another issue raised in the complaints concerned the high semester fees and the length of nursing programs. The Ombudsman supports the decision to eliminate tuition fees for nursing and midwifery programs due to a shortage of these professionals, which, according to MES data, has led to a 36% increase in enrolment in this field for the first time.

Main recommendations:

1. Provide sustainable funding for the education system.
2. Modernise school facilities and provide financial support for the implementation of innovative practices in schools.
3. Introduce a uniform standard for educational quality at all levels of education.
4. Modernise and improve the quality of vocational education.
5. Simplify curricula and instructional content to suit the students' age.
6. Ensure a steady increase in free extracurricular activities and sports in schools.
7. Ensure inter-institutional cooperation in implementing the Mechanism for Inter-institutional Collaboration on the Enrolment and Retention of Children and Students of Compulsory Pre-school and School Age in the Education System and Promoting Inter-institutional Cooperation.
8. Appoint psychologists, model teachers and teaching assistants in schools.
9. Build and renovate gyms and restrooms in school buildings.
10. Ensure an active engagement with parents to build trust and foster a partnership.
11. Improve the quality of higher education and its relevance to the labour market.
12. Expand projects under EU framework programs for research and innovation.
13. Institute measures for stricter control of the procedures for competitions for academic positions.
14. Increase the financial support for scientific research and the participation of higher education institutions in international projects.

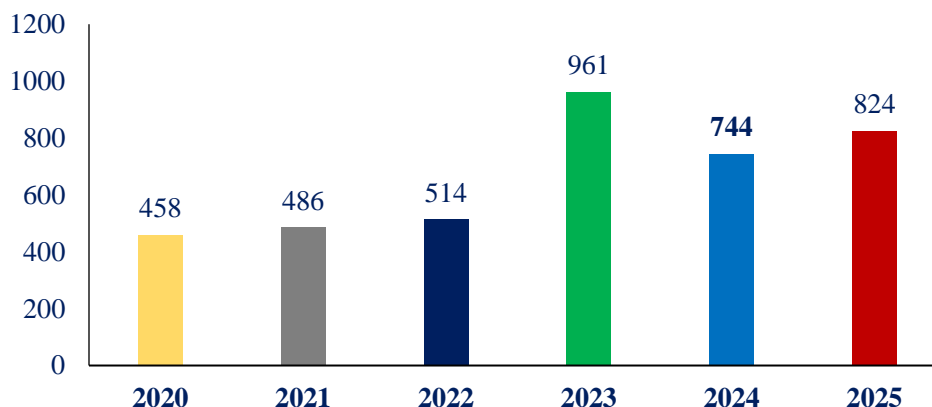
15. Take measures to address the imbalances associated with the rising average age of the academic staff.

In conclusion, the National Ombudsman emphasises that institutions need to continue their efforts to achieve the strategic goals of education to improve the quality of education and build skills and key competencies among children, students and young people, to include all children in the education system and to ensure their equal access to education.

IV. RIGHTS OF PEOPLE WITH DISABILITIES

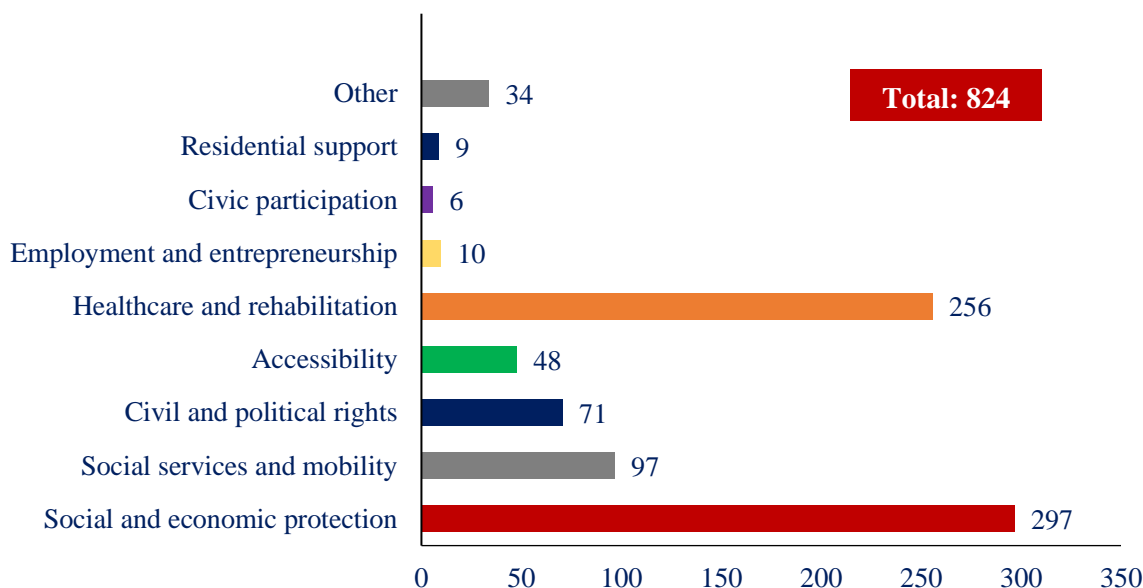
In 2025, the protection of the rights of people with disabilities occupied a key part of the work of the Ombudsman of the Republic of Bulgaria. In the context of a transforming economy, the primary mission is the transition from passive financial support to the actual provision of independent living. The institution continues to function as an independent body under the UN Convention (CRPD), having processed over 824 complaints in this sector during the reporting period. The year 2025 was marked by changes in the institution’s leadership, but the protection of the rights of people with disabilities remains an “irrevocable commitment” in the Ombudsman’s work.

Figure No. 10 Number of complaints related to the rights of people with disabilities for the period 2020-2025



Statistics show that, in 2025, there continued to be a significant increase in the complaints related to the rights of people with disabilities compared to the beginning of the period following the adoption of the Persons with Disabilities Act in 2019.

Figure No. 11 Number of complaints and signals related to the rights of people with disabilities by type in 2025



The data analysis covers a total of 824 registered complaints, divided into 9 categories. There is a clear predominance of sectors related to direct support and the physical well-being of citizens.

The priority areas cover three categories of rights:

- Social-Economic Protection (35.5%) and Healthcare and Rehabilitation (31%) which form the backbone of activities. This confirms that the **focus is on providing basic security and health support in response to citizens' complaints**.
- The middle segment comprising Social Services and Civil Rights accounts for a total of approximately 20.6% of the volume in the services and rights category, indicating sustained interest in legal protection and mobility.

The sectors of Employment, Residential Support, Civic Participation and Accessibility remain underrepresented (13.1% in total). They represent a potential resource in development zones for future strategies aimed at active social integration and long-term independence.

Social-economic protection as a guarantee of a dignified life

1 Financial support

In 2025, the protection of the social-economic rights of people with disabilities was at the heart of the work of the Ombudsman of the Republic of Bulgaria. In the context of a transforming economy and demographic challenges, the institution's primary mission is to ensure that no citizen with a disability is at risk of poverty or social exclusion due to systemic shortcomings.

During the reporting period, the focus of support shifted from purely administrative assistance to an **individualised approach** based on the needs of the individual. A key emphasis in the report is the linking of the monthly financial support to the new poverty line which is a key instrument under the Persons with Disabilities Act to compensate for income shortfalls.

Despite the nominal increase in funding, the Ombudsman noted that the social-economic protection still faced barriers such as:

- The complexity of procedures before the Social Assistance Agency;
- Delays in medical expert opinions of TEMC/NEMC;
- A shortage of funds earmarked for specific needs (medications, dietary foods and assistive devices);
- Need to harmonise the existing legislation in the area of social rights and equal treatment of people with disabilities.

The institution has repeatedly expressed the position that, following the issuance of an expert decision by TEMC or NEMC, the support to which people with disabilities are entitled should be paid in full and without delay.

2 Personal Assistance Act

The Personal Assistance Act is an important tool to ensure that people with severe disabilities can live independently. It provides the opportunity to receive assistance from a personal assistant who helps with one's daily activities.

Despite its positive role, the practical implementation of the law has revealed a number of problems, including:

- A limited number of hours of assistant support;
- Lack of a sufficient number of trained assistants;
- Funding instability;
- Lack of a substitute care mechanism.

Citizens filed complaints against the withdrawal of the assistance supplement under the Personal Assistance mechanism, the adequacy of the needs assessment under Article 20 of the Persons with Disabilities Act and the possibilities to determine objectively the number of personal assistance hours based on the questions included in the assessment regarding:

Article 13, para 2 of the statutory document provides that when the recipient of personal assistance is a child with a permanent disability for whom monthly assistance is received under Article 8e, para 5, item 2 of the Family Benefits for Children Act (FBCA), in the application statement for the provision of personal assistance, the applicant shall give written consent for up to BGN 380 of the assistance, where the specific amount corresponds to the number of hours determined in the individual needs assessment, to be transferred to the municipality's budget by the Social Assistance Agency, following the appointment of an assistant and the conclusion of the employment contract. A similar provision is set forth in Article 13, para 3 regarding applicants for personal assistance who receive an assistance supplement under Article 103 of the Social Security Code. They are also required to agree in writing that the assistance supplement be transferred to the Social Assistance Agency by the National Social Security Institute after an assistant has been assigned and an employment contract has been concluded.

Citizens complain that municipalities deduct BGN 380 from the monthly allowance under Article 8e, para 5, item 2 of the FBCA, regardless of the number of hours specified in the individual needs assessment for children with disabilities, thereby failing to comply with the provisions of the Personal Assistance Act. The actions of municipal administrations are also contrary to the principles and requirements of the UN Convention on the Rights of the Child, the UN Convention on the Rights of Persons with Disabilities and the Charter of Fundamental Rights of the EU.

As the Ombudsman has repeatedly noted in statements, under the current Bulgarian law, families and children are entitled to protection from society and the State. This protection can be provided in various ways, but at present, the benefits under Article 8e of the FBCA serve as the primary mechanism for financial support for every family in which medical experts have determined that there is a child with disabilities. It is important to emphasise that the monthly benefits support families in meeting the children's needs, particularly regarding any necessary therapy and appropriate conditions that must be provided. The adequate state intervention also means a real opportunity for families not only to stabilise the children's condition. In many cases, this assistance leads to significant improvement and even to the children no longer being classified as "children or persons with disabilities" and to their full inclusion in society.

Complaints from parents indicate that families where children with disabilities have turned 16, have been assessed with a degree of permanent reduced working capacity of more than 71% and are eligible for personal care assistance find themselves in an even more difficult situation. In these cases, municipalities simultaneously apply Article 13, para 2 and Article 13, para 3 of the Personal Assistance Act, resulting in a reduction of state support by BGN 630.11 (BGN 380 from the monthly benefits under Article 8e, para 5, item 2 of the FBCA + BGN 250.11 from the supplement assistance). Given the vulnerable situation in which families of children with disabilities find themselves and their proven needs, the complete withdrawal of assistance or its unjustified and unfair reduction jeopardises the achievement of the objectives of the FBCA and international human rights acts.

It is important to note that the requirement for eligible individuals to waive the supplement assistance under Article 103 of the Social Security Code and part of the monthly benefits under Article 8e of the Family Benefits for Children Act constitutes a serious obstacle for those in need to apply for

inclusion in the personal assistance mechanism and is a frequent reason why they remain without a personal assistant. The withdrawal of funds is particularly difficult for people with disabilities who live alone, without close friends or relatives, and rely solely on a disability pension. For many of them, it is impossible to set aside BGN 250.11 from their monthly income, which is why they often choose not to use personal assistance so that they can cover at least part of their other living expenses. The complaints insist that in such cases, not the entire supplement should be withheld, but only a portion of it, or that they should be fully exempted from this obligation, and that the wages of personal assistants should be increased. They also propose a mechanism that would allow people with disabilities to forgo a proportional portion of the funds, depending on the number of hours of assistant support used.

Key conclusions for 2025.

- **Administrative trap:** Many people are left without income during the period between the expiration of their old TEMC decision and the issuance of a new one, despite legal changes providing for an automatic extension.

- **Inadequacy of supplements:** Despite being indexed to the poverty line, the assistance supplement remains symbolic given the actual costs of nursing care services.

Main recommendations:

1. Guarantee continuity of income through:

- Strict control over the implementation of Article 73 of the Persons with Disabilities Act to prevent the suspension of social benefits and pensions due to delays by the medical examination bodies (TEMC/NEMC).

- Review inconsistencies in the Social Security Code and the Health Act in order to guarantee the continuity of payments for established entitlements.

2. Ensure automatic social payments:

- Introduce a mechanism of **ex-officio disbursement** of monthly financial assistance immediately upon issuance of a TEMC decision, without requiring the submission of a new application to the Social Assistance Agency (SAA). This will eliminate subjective factors and delays.

3. Review the Individual Needs Assessment:

- Amend the Methodology for Individual Assessments so that it reflects the **actual need for support and living expenses**, rather than just the degree of disability. It is recommended that a “basket of specific needs” (medications, supplies, rehabilitation) be included when determining the level of support.

4. Expand the scope of targeted assistance:

- Update the secondary legislation governing social-economic rights by introducing a **special ratio for people with disabilities** that excludes the assistance supplement from the total income of the household.

The social-economic protection should not be viewed as a fiscal burden, but rather as an **investment in human capital** that enables people with disabilities to be active participants in society, rather than merely recipients of social assistance.

Social services and personal mobility

1. Social services and in-home support

An important part of social policy is the provision of in-home services which enable people with disabilities to live independently.

In recent years, these services have been provided through various national and European programs. However, cuts in funding for some of these programs have led to a significant reduction in the number of users.

In some municipalities, the number of people receiving in-home care has been cut by more than half, leading to serious social consequences.

These services include: assistance with daily activities; meal delivery; medical monitoring; psychological support.

The lack of sufficient social services increases the risk of social isolation and a deterioration in the health of people with disabilities.

2. Personal mobility and transportation

The Ombudsman received complaints about a number of issues related to personal mobility and access to transportation for people with disabilities. It should be noted that, despite the measures taken, a significant portion of public transportation, both in urban areas and on intercity routes, is still not sufficiently adapted for people with limited mobility which restricts their ability to travel independently.

Significant difficulties also arise when using the **European parking card for people with disabilities** as different municipalities have different practices regarding its acceptance. This raises the matter of creating a national electronic registry of cards to facilitate monitoring and ensure consistent enforcement.

The report also examines the specific case of a citizen with an amputation who, after renewing his driver's license, was stripped of some of the categories he had previously obtained, even though he works as a professional driver abroad and uses a specialised driving prosthesis. Another difficulty is the practice of taking away the old license upon renewal and issuing the new one within 30 days, during which time the citizens are left without a valid driver's license. The inability to issue a temporary license may lead to restrictions on the right to work and freedom of movement.

Another important issue concerns **restrictions on obtaining a driver's license for people with disabilities**, particularly with regard to three-wheeled motor vehicles in the L5e category. Representatives of non-governmental organisations point out that the Bulgarian legislation does not ensure equal conditions for taking a driving test with this type of vehicle, which creates conditions for inequality compared to practices in other European Union Member States. In this regard, recommendations have been made to the competent institutions to undertake legislative changes that would guarantee fair access to obtaining a driver's license in compliance with European transport policies.

A need is identified to expand access to **modern mobility aids** with a call for the modern battery-powered wheelchairs and specialised navigation software to be included on the list of products covered by the health insurance system.

Main recommendations:

1. To the Ministry of Labour and Social Policy:

- Initiate legislative changes to the Personal Assistance Act aimed at increasing flexibility and creating conditions to address shortages in the supply of qualified personnel for personal assistance. Review the ratios – linking hours to a more dynamic assessment that allows for an increase in the monthly limit for people with the most severe disabilities, exceeding current maximums for specific needs. Provide for “substitute care” to allow municipalities to hire “mobile assistants” to provide care when the regular assistant is on sick leave or vacation. Professionalise personal assistance by introducing mandatory training courses for non-relative assistants to improve the quality of service.

- Develop a quality standard for the “Personal Assistance” service that includes mandatory training on working with people with various types of disabilities.

2. To municipalities:

- Provide the care people need through social services such as Personal Assistance, Information and Counselling, Advocacy and Intermediation, Therapy and Rehabilitation, and Skills Training, as regulated by the Social Services Act, through an organisationally appropriate delivery model, including through in-home social services which are a local activity.

- Expand the network of specialised door-to-door transport, particularly in remote areas.

3. To the Ministry of Interior and the Ministry of Labour and Social Policy:

- Take the necessary steps to ensure fair conditions and equal access to obtaining a driver's license for people with disabilities or impairments, in compliance with the European legislation on transport policies, and propose amendments to the Road Traffic Act, granting people with disabilities the right to drive a three-wheeled motor vehicle of the L5e category.

Healthcare and rehabilitation

1. Medical expert opinions and access to healthcare

The medical assessment system (TEMC and NEMC) plays a key role in determining the rights of people with disabilities. It is used to determine the degree of disability and access to various social and health services.

Despite the importance of this system, it continues to be the subject of widespread criticism. The main problems are related to: long processing times for documents; complex administrative procedures; the need for numerous medical documents; delays in the delivery of decisions.

These problems often leave the citizens in a state of prolonged uncertainty and hinder their access to social services and financial assistance.

2. Access to medical devices and medication

In 2025, the National Health Insurance Fund expanded the range of reimbursed medical devices. However, there are still problems related to “hidden out-of-pocket payments” for supplies related to insulin pumps and ostomies, which place an additional financial burden on people with disabilities. There are also reports of increasing shortages of certain medications, including drugs for rare diseases and epilepsy.

The citizens continue to face difficulties in accessing medications for war veterans and those injured in military service. Representatives of their national representative organisation raised the matter of the need to update the list of medications under Ordinance No. 2 and to introduce the option of electronically prescribing certain medications. In this regard, a recommendation was made to the Ministry of Health to take action, which has not yet been implemented.

3. Rehabilitation and mental health

Complaints submitted to the Ombudsman highlight a shortage of clinical pathways for long-term rehabilitation following strokes and severe injuries, which limits the options for ongoing treatment for people with disabilities. In this regard, a proposal was made to increase the limits on the length of stay in specialised medical institutions.

Furthermore, there is also a need for substantial reform of the psychiatric care system. As the National Preventive Mechanism, the institution emphasises the need to improve conditions in state psychiatric hospitals and to develop more effective policies to protect the rights and ensure access to treatment for people with mental disorders.

4. Access to assistive devices

Assistive devices and medical supplies are essential for people with disabilities to live independently. Despite the reforms that have been implemented, a number of problems still exist in this area.

- **Insufficient financial limits** set by the NHIF which often do not cover the actual market value of high-tech devices such as prosthetics.
- **Slow updates to the list** of medical and assistive devices provided.
- **Limitations on the quality and service life** of the products supplied.
- **Lack of representation of people with disabilities** on the committees that determine the value and terms of funding for medical devices.
- **Insufficient control** of the actual distribution of goods to citizens in need.

Administrative difficulties are also mentioned such as the requirement for re-examination by medical commissions when obtaining orthopaedic shoes, even though in many cases the disabilities are irreversible. This creates an additional financial and organisational burden for people with disabilities. It is also noted that the **restriction that medical examinations may only be conducted at the patient’s permanent address** hinders the citizens’ access to necessary assistive devices and contradicts the objectives of the legislation protecting the rights of people with disabilities.

Problems in implementing a project under the National Recovery and Resilience Plan: lack of sufficient public information and transparency; delays in the provision of assistive devices; mismatch between the devices provided and the users’ actual needs; lack of opportunity for advance

selection or replacement of an unsuitable device; restriction to providing only one assistive device in cases where more are needed.

The complaints received indicate that there is a need **to improve the mechanisms for providing assistive devices** so that the procedures are more accessible, transparent and tailored to the actual needs of people with disabilities.

It is important to emphasise the need to involve representatives of organisations of persons with disabilities in the decision-making process.

Main recommendations:

1. To the Ministry of Health:

- Speed up the full digitisation of medical records to eliminate the need to physically transport paper documents between committees.
- Take the necessary steps to ensure access to medications in accordance with the procedures set forth in Ordinance No. 2 of 29 July 2016 regarding the electronic prescribing of antibiotic medications, as implemented by the Ministry of Health in 2024, in order to protect the rights of eligible war veterans to receive such medications free of charge or at a reduced cost.

2. To the National Health Insurance Fund:

- Expand the list of medical devices covered at 100%, with a focus on high-tech prosthetics and personal mobility aids.
- Review the price caps (limits) paid by the NHIF for medical aids. There is a call for annual adjustments based on market prices to put an end to the practice of “co-payments” which are often unaffordable for citizens.

3. To municipalities:

- Establish more municipal centres for day rehabilitation and psychological support which would be free of charge for individuals with a disability rating of over 70%.

Civil and political rights

Legal capacity and the need for legislative reform

The protection of the civil and political rights of people with disabilities is seen as an indicator of the maturity of a democratic society. In the Ombudsman’s opinion, having a disability cannot be grounds for restricting fundamental rights and freedoms.

1. Access to elections

Observations from the 2023–2024 election cycles reveal a number of barriers to the participation of people with disabilities in elections. The main issues relate to the **architectural inaccessibility of many polling stations** which forces voters to use mobile ballot boxes. This limits their ability to exercise their right to vote on an equal footing. There are also **challenges related to information accessibility** due to the lack of campaign materials in accessible formats such as audio, sign language interpretation or easy-to-read information.

2. Access to justice and legal capacity

The Ombudsman works in collaboration with the National Legal Aid Office to ensure **free legal aid** to people with disabilities who are victims of discrimination or violence.

Significant emphasis is placed on the **need to reform the institution of legal incapacitation**. The 2024 Annual Report highlights that the current model under the Persons and Family Act is outdated and leads to a de facto “civil death” for thousands of citizens. The following is proposed:

- Lift the full and limited legal incapacity;
- Introduce a **supported decision-making model** in which the individual retains their legal capacity;
- Applying an **individualised approach** when determining the necessary support;
- Perform **periodic judicial reviews** of the measures to prevent a permanent restriction of rights.

The reform is subject to **strong international pressure**. The European Court of Human Rights, in the case of *Stanev v. Bulgaria*, as well as the Committee of Ministers of the Council of Europe, the UN Committee on the Rights of Persons with Disabilities and other international bodies are calling for changes in the legislation. According to them, the current system of incapacitation is contrary to the international standards and could lead to new adverse rulings against Bulgaria.

3. Participation in public life

The Ombudsman emphasises the importance of the principle “**Nothing about us without us**” which requires the active participation of organisations of persons with disabilities in the policy-making process. However, there have been instances of **formal consultation** in which the views of civil society are not genuinely reflected in legislative decisions.

Another problem is the **insufficient funding of national representative organisations** for people with disabilities. The state subsidies have not been adjusted since 2019, despite the significant inflation, which hinders their operations and ability to represent their members.

Social integration is also viewed through the lens of **access to cultural, sporting and community life**. It is noted that: many publicly funded cultural events do not provide the necessary accessibility features (sign language interpretation, audio descriptions, architectural accessibility); a number of municipalities lack **adapted sports facilities** such as fitness centres and swimming pools suitable for people with disabilities.

Main recommendations:

1. To the National Assembly:

- When reviewing and adopting the 2026 state budget, take account of the need to update the annual state subsidies provided to national representative organisations of and for people with disabilities.
- Adopt urgently the Natural Persons and Support Measures Act to replace the incapacitation regime with support mechanisms in accordance with Article 12 of CRPD.

2. To the Council of Ministers:

- Resume the in-person meetings of the National Council for People with Disabilities.

3. To the Central Electoral Commission:

- Develop standards for “accessible polling stations” that include not only platforms but also accessible voting machines equipped with software for the visually impaired. Introduce mandatory video interpretation into sign language during public debates.

4. To the Ministry of Culture:

- Amend the rules of the National Culture Fund to introduce accessibility requirements (sign language interpretation, audio descriptions, platforms).

5. To the Ministry of Youth and Sport:

- Introduce a rule to prioritise funding for clubs that promote paralympic sports.

6. To the Ministry of Justice and the Ministry of Interior:

- Provide training for judges and police officers on the specifics of interacting with people with intellectual and mental disabilities.

Accessibility: architectural, transportation, and information

An accessible environment is a fundamental human right that enables people with disabilities to fully exercise their other rights. In 2025, the Ombudsman noted that Bulgaria still had **a fragmented and insufficiently effective approach** to creating an accessible environment.

1. Architectural accessibility

One of the main problems remains the **inaccessible housing environment**, especially in older residential buildings with no platforms or lifts. This often leads to social isolation of people with disabilities. Reports to the Ombudsman show cases where citizens with severe disabilities are unable to install a ramp in front of their homes due to administrative obstacles or a lack of consent from neighbours.

Additional difficulties arise from the **eligibility requirements of the National Program for Accessible Housing and Personal Mobility** which mandate the formation of a condominium association or the upfront financing of project activities. This leaves many people with disabilities dependent on their neighbours and on financial resources they often do not have. In the Ombudsman's opinion, the conditions should be more flexible and simplified to ensure real access to the program.

Another problem remains the **shortage of specialised municipal housing** as well as the insufficient amount of targeted rental assistance under the Persons with Disabilities Act which does not reflect actual market prices.

2. Access to cultural and sporting sites

Although new buildings generally meet the statutory accessibility standards, **a large proportion of the existing cultural and sporting sites** – such as theatres, cinemas and stadiums – remain difficult or completely inaccessible to people with disabilities.

3. Transport accessibility

Problems are also observed in the transportation sector. **Rail transport** continues to face criticism due to a shortage of railcars with wheelchair-accessible platforms and inaccessible station platforms. In urban areas, there is a **lack of audible signals at traffic lights and tactile paving**, especially in smaller towns, which makes it difficult for people with visual impairments to get around.

4. Digital and information accessibility

The development of e-government has made it obvious that **some government e-services and websites are not compatible with specialised software for visually impaired users**. At the same time, the Ombudsman monitors the implementation of the Bulgarian Sign Language Act, insisting on the provision of sign language interpreters in administrative and healthcare institutions.

Main recommendations:

1. To the Ministry of Regional Development and Public Works:

- Change the regulatory framework to require of investors to incorporate universal design, rather than merely “adapting” sites. Provide targeted budgetary funding for the accessibility of private homes (construction of ramps and lift platforms), as the current MLSP programs cover only a minimal portion of the actual needs.
- Exercise strict control of the accessibility of pedestrian areas and public transportation stops as part of urban mobility.
- Introduce mandatory quotas for the construction of affordable housing.

2. To the Ministry of Labour and Social Policy:

- Revise and amend the terms and conditions set forth in the National Program for Accessible Housing and Personal Mobility, Accessible Environment module, with the aim of improving access to funding for people with disabilities and limited mobility, including those with low incomes.
- Update the amount of rental assistance for municipal housing for people with disabilities.

3. To the Ministry of Transport and Communications:

- Link subsidies for transport operators to the actual accessibility rate of the bus fleet. Link transport operators' licenses to accessibility requirements. Develop a clear schedule to renew the rolling stock of BDZ and improve accessibility for people with disabilities.

4. To the Ministry of Culture:

- Introduce a mandatory accessibility standards for all festivals and events funded through public means.

5. To local authorities:

- Develop interactive maps of the accessible tourist and cultural routes in cities and towns.

6. To the Ministry of Electronic Governance:

- Comply with the Accessibility Directive, conduct an accessibility audit of all public online platforms and mobile applications.

Employment and entrepreneurship

1. Employment and economic integration

Employment is a key factor in the social integration of people with disabilities. Despite the existing subsidised employment programs, a large proportion of these citizens continue to face difficulties in finding work. Despite the low unemployment rates in the country in 2025, people with disabilities continue to face significant challenges in the labour market. The limited employment opportunities, the existing stereotypes and the lack of effective support policies restrict their ability to lead independent and dignified lives. Many employers prefer to pay compensation fees rather than hire people with disabilities.

2. Quotas and incentives for employers

The implementation of quotas for hiring people with disabilities is often circumvented as employers prefer to pay compensation fees rather than create adapted workplaces. Subsidised employment programs provide temporary job opportunities, but there is a need to create sustainable jobs in the real economy.

Young people with spina bifida and hydrocephalus report difficulties in finding internships and their first job after completing their education. A proposal has been made to create a national online platform for career guidance, internships and connecting with employers.

Main problems found:

- Insufficient number of jobs for people with disabilities under current employment programs;
- Limited scope of the Employment and Training for People with Permanent Disabilities National Program;
- Lack of sufficient awareness among employers regarding opportunities to hire people with disabilities;
- Lack of adapted workplaces;
- Insufficient incentives for employers;
- Low effectiveness of the quota system.

3. Social entrepreneurship

The Ombudsman supports the development of specialised enterprises and cooperatives, recommending tax breaks and incentives for participation in public procurement.

People with disabilities face difficulties when starting their own businesses due to limited access to bank financing and a lack of information about European programs and grants.

4. Adapted workplaces

There is a shortage of funds for the technological and technical adaptation of the work environment (specialised software, assistive technologies and equipment).

It is recommended that the budget for workplace adaptation be increased and that better conditions be created for the employment of people with disabilities.

Main recommendations EMPLOYMENT AND ENTREPRENEURSHIP:

1. To the Ministry of Labour and Social Policy:

- Develop a sheltered employment program for people with intellectual disabilities who require on-the-job coaching.

- Increase in the budget for adapting the work environment.
 - Ensure sufficient job opportunities, in accordance with reported needs, for people with disabilities under existing programs, particularly under the Employment and Training for People with Permanent Disabilities National Program.
2. **To the Employment Agency:**
 - Digitise intermediation services and create a specialised filter on the job portal showing the accessibility of employers' offices.
 3. **To the Ministry of Finance:**
 - Introduce additional tax incentives for employers who permanently employ people with a disability rating of over 70%.

Towards a society of equal opportunities

The analysis of the state of the rights of people with disabilities in 2025 shows that Bulgaria is in a transitional period – moving from institutional care toward support for independent living. Despite the reported progress in the digitisation of certain services and the nominal increase in financial support, systemic barriers remain significant.

The past year confirmed that the protection of rights cannot be partial. The social-economic protection is meaningless without an accessible architectural environment; the right to work is unattainable without personal mobility; and civil rights remain a formality without access to justice and information.

The main conclusions that emerge are:

- **Need for a complex approach:** Social policy must stop being partial. Full coordination is needed between the Ministry of Labour and Social Policy, the Ministry of Health and the Ministry of Regional Development and Public Works to ensure that citizens do not fall through the “administrative cracks”.
- **From “assistance” to “investment”:** The State needs to invest in inclusive education, employment and accessibility which, in the long term, will reduce the dependence of people with disabilities on the social welfare system and enable them to become active participants in the economy.
- **Prioritise dignity:** The reforms regarding legal capacity and the abolition of legal incapacity can no longer be postponed. They lie at the heart of human dignity and personal freedom.

The Ombudsman institution remains an unwavering guardian of the compliance with the UN Convention. In 2026, the focus will be on monitoring the implementation of the recommendations set forth in this report.

Protecting the rights of people with disabilities is not charity – it is a matter of justice and respect for the fundamental human rights. A State that is accessible to people with disabilities is a better and more livable place for all its citizens.

Main recommendations:

1. People with disabilities or their representatives to be included and to participate at all levels of governance where decisions are made or policies are formulated that affect their rights;
2. Resolve the issues related to personal assistance and ensure that all those in need have access to the necessary personal assistance, including people with disabilities who have a specific type and degree of disability/degree of permanently reduced working capacity but are not entitled to personal assistance;
3. Introduce integrated electronic services in government agencies for people with disabilities;
4. Carry out adequate reform of the medical examination process to ensure an objective assessment of the citizens' health status and to prevent delays in the issuance of expert decisions;
5. Implement a paradigm shift in the process of determining and providing support for people with disabilities, with the individual needs and functional abilities of the person with a disability taking precedence: “functional assessment”;

6. Initiate legislative changes to ensure equal treatment for people with disabilities when acquiring the right to a disability pension due to a general illness, based on work experience gained both before and after the date of disability;

7. Provide for the right to choose a pension of a lower amount in order to receive a more favourable amount of monthly financial support, as well as the option to receive a disability pension due to general illness in cases where expert decisions are revoked and returned pending the entry into force of the decision of the NEMC or, respectively, of the court's judgment on the appealed decision of the medical examination authorities, until the decision of the NEMC takes effect. Adopt legislative changes to resolve the issues with disability pensions, including their timely reinstatement and payment.

8. The competent authorities are to adopt a consistent approach in their work to ensure the right to an accessible environment for people with disabilities.

9. Implement clear, specific and consistent measures in the short term to ensure subsidised employment for people with disabilities and the introduction of meaningful incentives for employers, including adapted workplaces for people with disabilities.

V. RIGHTS OF CHILDREN

The year 2025 is significant for the rights of children, with the Ombudsman institution playing a key role in protecting and promoting these rights. The ongoing efforts of this independent body to improve the legal framework and practices in the field of children's rights are becoming increasingly visible, thereby creating a safer and more supportive environment for all children.

The key tasks of the Ombudsman in this area in 2025 were also derived from the complaints received by the institution and from monitoring the public sectors in which children's rights were being advanced. A systematic part of the Ombudsman's work involves reviewing and assessing the commitments made by institutions.

For the Ombudsman, the year brought mixed progress in terms of protecting children's rights and addressing key challenges to their implementation. Note should be made that there is an increased focus on digital safety, the fight against child poverty and the active participation of children in decision-making processes, but these topics have not yet become sustainable and effective solutions. Violence against children remains a systemic problem, with many educational institutions facing difficulties in providing a supportive and safe environment. The level of inclusion in the educational process of children with special educational needs (SEN) and children of Roma origin remains a challenge.

Despite efforts to draft an updated version of the Child Strategy, this important document has not been reviewed and adopted by the Council of Ministers as of 2025.

A major challenge for Bulgaria remains the absence of centralised data collection on children which, in practice, limits the ability to conduct regular monitoring of the situation and develop adequate, evidence-based policies. In practice, data on vulnerable groups of children, such as children with disabilities and children of Roma origin, are virtually inaccessible.

Another serious problem is the lack of sufficient and targeted investment in families. Numerous support programs fail to contribute effectively to eradicating and breaking the cycle of poverty, which is a key driver of the main risks facing children. The access to social assistance for poor families is often hindered by a lack of knowledge and information, heavy administrative barriers, restrictive conditions and discriminatory provisions. The lack of comprehensive support and appropriate services for these families are among the main causes of this alarming situation. The main complaints from citizens who turn to the Ombudsman are related to the feeling that there is no justice.

The chronic problems of the child protection system are still – the lack of clear professional requirements for social workers in child protection departments (CPDs), low pay, high workload, limited opportunities for training and supervision – drastically limit the capacity for effective management of the inter-institutional work on complex cases of violence and risk.

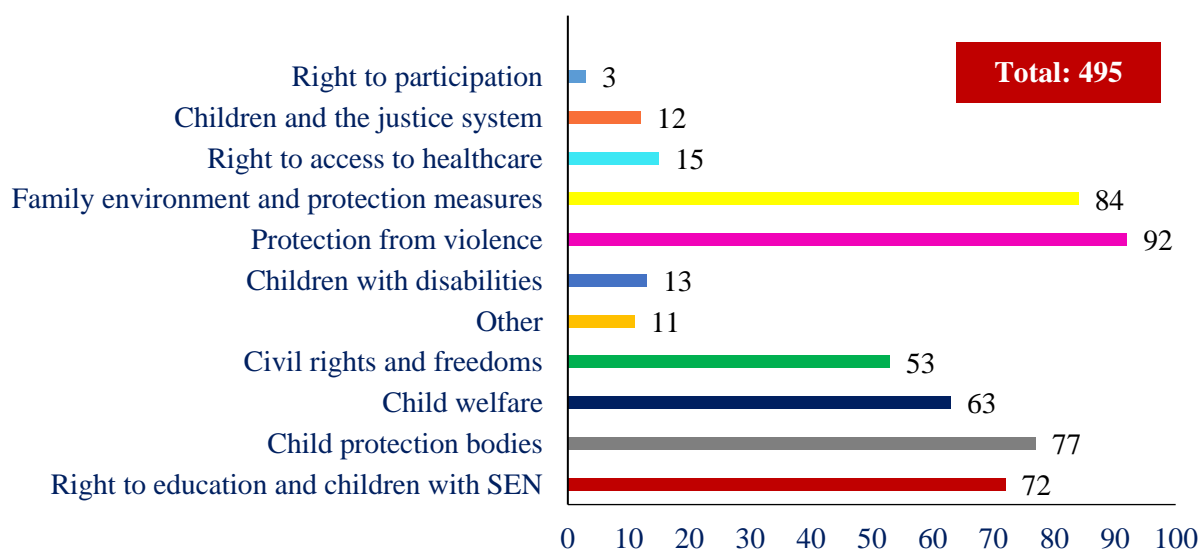
Specific legislative proposals, action plans, budgetary resources and monitoring systems are needed in all areas affecting children and their families.

In light of the challenges identified, the rights of children remained a central focus for the Ombudsman in 2025; the institution took a number of actions and proposed specific measures to improve the systems for the protection of children’s rights and the social and institutional environment.

The national strategies for Roma inclusion have not yet led to significant and tangible progress. Roma participation in education has increased, but issues such as early school leaving and segregation in education remain problematic. Progress has been limited regarding measures to address poverty among Roma children, evictions and access to healthcare.

In 2025, 495 complaints and signals were received in relation to violations of children’s rights. A total of 17 881 individuals submitted petitions to the Ombudsman.

Figure No. 12 *Number of complaints and signals in the area of the rights of children by type in 2025*



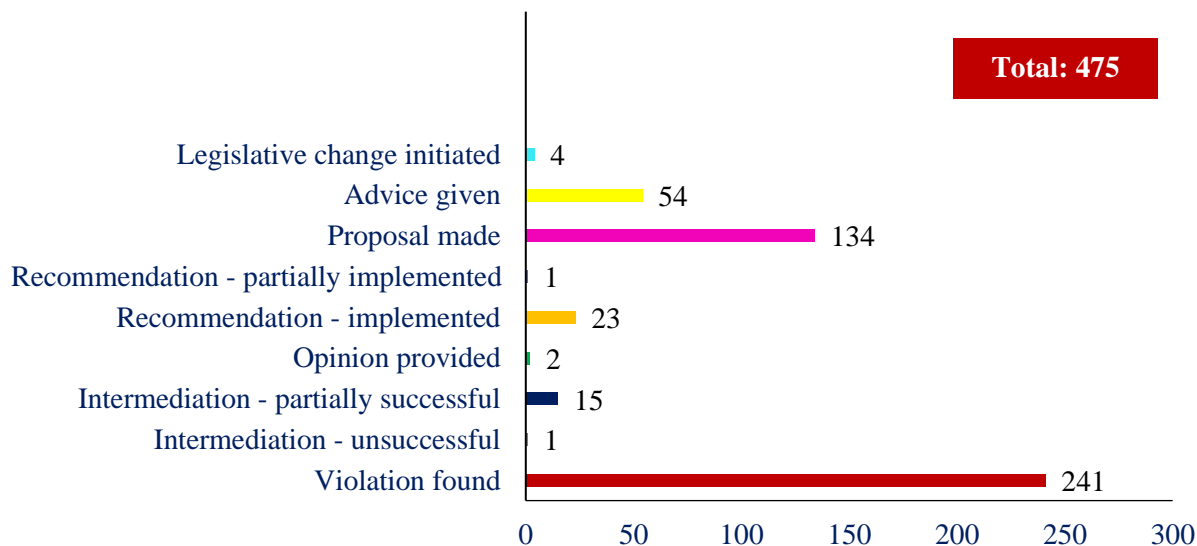
Complaints and signals have been filed in various areas of children’s rights; typically, each one concerns a different individual issue, they require a significant amount of time to investigate and, quite often, it is necessary to conduct enquiries at multiple institutions. During most inspections, meetings are held with the complainants, working discussions are organised with representatives of the competent authorities and on-site checks are conducted to examine thoroughly the issue brought to the Ombudsman’s attention. During such meetings, many citizens receive specific advice and guidance regarding the issues and problems they have brought to the Ombudsman’s attention. In some of the complaints, it can be concluded that the issues raised affect an unspecified number of children, such as violence and aggression in school, poverty, healthy eating and others.

In handling these cases, it has been observed that complainants do not utilise the institutional complaint mechanisms, express distrust that an effective inspection will be conducted, and doubt that the necessary measures will be taken which, in practice, hinders the work of the Ombudsman institution as it needs, in fact, to monitor the actions taken by the competent authorities to protect the rights and best interests of the child. Very often, the problems escalate and gain media attention, which puts the authorities in an “explanatory” mode and creates tension that frequently distorts the work on the case.

In 2025, the Ombudsman issued over 300 proposals and recommendations, some of which pertained to specific cases, while others addressed the rights of larger groups of children. The largest number of recommendations were addressed to child protection authorities: Social Assistance Directorates (SAD), Social Assistance Agency (SAA), State Agency for Child Protection (SACP), Ministry of Labour and Social Policy (MLSP), Ministry of Education and Science (MES) and Regional Education Offices (REO), Ministry of Health (MH), National Health Insurance Fund (NHIF), followed by mayors of municipalities and law enforcement agencies. In response to the recommendations, the Ombudsman has been informed of the actions taken, including any violations identified. The Ombudsman notes that a number of recommendations made in the 2023 and 2024 Annual Reports whose

implementation requires longer-term and comprehensive measures are still awaiting adequate and sustainable solutions.

Figure No. 13 *Manner of completion of the inspections upon complaints in 2025*



In 2025, there was a larger number of complaints involving an international element, in which the children's habitual residence was in another country but a protective measure was taken and the child was removed from their family.

Traditionally, there was a high number of complaints related to a child's right to maintain contact with both parents, and support was sought for children growing up in an environment marked by long-standing parental conflicts.

The rights of children with disabilities remain among the issues on which the Ombudsman is routinely called upon to intervene; in 2025, the largest number of complaints concerned requests to increase the monthly benefits under Article 8e of the Family Benefits for Children Act (FBCA).

By the end of 2025, over 100 complaints had been received regarding children's rights and the access to quality education for children with SEN. The Ombudsman notes that the education of children with SEN and behavioural difficulties is of key importance in order to achieve an inclusive and equitable learning environment, but the challenges in this area remain significant.

Children and young people turn to the institution with complaints about issues they themselves have faced: discrimination, violence, problems with parents, institutions and public services. The Ombudsman considers this is an important sign of trust and recognition of the institution by children, although active steps must be taken to develop the online system for children to file complaints and to promote it.

CHILDREN'S ACCESS TO JUSTICE

Rights of children in conflict with the law

Children's access to justice is a fundamental right that enables them to seek legal remedies when their rights are breached. All children should have the opportunity to assert their rights through legal and other services or support from adults with specialised knowledge, and through the application of various approaches, including interdisciplinary ones. However, children face numerous barriers when seeking protection in cases of rights violations, most often related to the lack of adapted procedures, trained professionals and supportive interdisciplinary services.

The Ombudsman actively advocates for a comprehensive overhaul of the outdated system for children in conflict with the law and the introduction of the principles of child-friendly justice. A few days after Ms. Velislava Delcheva took office as Ombudsman, a surprise inspection was conducted at the Hristo Botev Social Educational Boarding School (SEBS) in the village of Varnentsi, Tutrakan Municipality. The inspection was prompted by a report submitted by UNICEF Bulgaria and the Bulgarian Helsinki Committee (BHC). The information in the complaints was gathered as part of

projects carried out by the organisations, during which interviews were conducted with children placed in the SEBS in the village of Varnentsi by virtue of court orders. In connection with these serious and very grave allegations, on 24 July 2025, the Ombudsman of the Republic of Bulgaria and her team visited the Hristo Botev SEBS in the village of Varnentsi. With a view to ensuring the rights and interests of children placed in the SEBS, a Special Report¹ was drawn up which is available on the Ombudsman's website.

Regarding the issue of children in conflict with the law, the Ombudsman institution maintains a consistent position calling for urgent action to repeal the outdated legislation and replace it with justice that takes into account the best interests of the child, or "justice adapted to the needs of the child". In connection with this highly topical issue of juvenile justice, on 12 September 2025, the Ombudsman convened a meeting of the Civil Advisory Council. Key issues related to reform in the field of juvenile justice were discussed at the meeting. The Ombudsman's initiative aims to reach a consensus on the main steps that can be taken in light of the current work of the inter-departmental group at the Ministry of Justice.

The Ombudsman outlined her position on the key issues on which she believed consensus must be reached in order to mobilise the political will for change:

Children under 14 years of age – a responsibility of the social welfare system and universal and social services for children, or solely of special educational measures.

A vision for the role of the social system in supporting children and families engaged in unlawful behaviour and in conflict with the law.

institutional network for response, intervention and support for children in conflict with the law.

Ensuring domestic legal remedies to protect children's rights when placed in special educational institutions and boarding houses.

Main recommendations:

1. Take measures to ensure specialisation, continuing education and the enhancement of professional competence for all professionals in the juvenile justice system, including investigative authorities, prosecutors, attorneys and judges, as well as so-called support professionals (social workers, psychologists, educators, probation officers, etc.);
2. Guarantee the rights of children with disabilities who are victims of crime by taking measures to ensure access to justice.
3. Take measures regarding the hearing or questioning of a child, ensuring that these take place in a specialised room ("blue room").
4. Develop a vision for the involvement of the social system in the work and support of children and families exhibiting unlawful behaviour and in conflict with the law.
5. Provide a wide range of restorative practices for children in conflict with the law, bringing together the efforts of the judicial, social, health and educational systems.
6. Ensure equal access to psychological and psychosocial support programs and services for children involved in legal proceedings.
7. Ensure effective coordination in the preparation of individual assessments of children. This stems from the observed lack of mutual understanding of the regulatory framework and practices between the child protection system and the criminal investigation system.
8. Develop a new concept for a child-friendly national justice policy.

Rights of children caught in parental conflicts

The topic of the rights of children caught in parental conflicts has been a focus of the Ombudsman's attention for years and it is highlighted as a key issue in every annual report.

In 2025, more than 80 complaints and signals were received and the Ombudsman was sought in cases of increasingly bitter parental disputes in which children were caught up in endless administrative and legal proceedings. The infringement of the right to personal relations and direct contact with both

¹ [Report Varnentsi SEBS](#)

parents in cases of parental conflict has brought this issue to the forefront again this year. Each parent seeks a protective institution or agency to “win over” which, in turn, leads to dozens more complaints. There is a case of a parent who filed over 100 letters regarding the same complaint, challenging every line drafted by the child protection system. In most cases, this indicates institutional powerlessness to intervene effectively and a lack of an effective legal means to enforce court orders for child custody. The existing mechanisms do not lead to the expected result. The Ombudsman finds it necessary to emphasise that although the complaints are filed by parents who want the Ombudsman to advocate for their breached right to see their children, the Ombudsman always examines these cases through the lens of the child’s right to maintain personal relationships with their parents. This is a fundamental right of the child which is explicitly regulated in the Convention on the Rights of the Child and is part of our domestic legislation.

Violations of a child’s right to a personal relationship resulting from severe parental conflict have not only legal but also psychological and social dimensions. In some cases, the Ombudsman has found that the actions taken by CPDs can be described as formal and inadequate for the specific situation. Unfortunately, in many cases the parents claim that the attempts of the government institutions at mediation are actually experienced by the children as pressure; in such cases, the children’s opinions are disregarded and the attempt at protection actually becomes a model of violation of children’s rights.

The conclusions drawn from the Ombudsman’s practice are that the authorities and their actions do not lead to the resolution of conflicts between parents and children, and that children do not receive effective protection of their rights; on the contrary, attempts at mediation often have the opposite effect. Once again, it is observed that the work of social workers often consists solely of talking to parents about their responsibilities and advising them not to involve their children in the conflict. Furthermore, many social reports continue to be prepared using a template and the conclusions in them are based solely on conversations with the parents. The Ombudsman notes the need for timely action, with social services actually monitoring the situations.

The amount of child support awarded is a topic that consistently generates complaints, with dissatisfaction expressed over the lack of a modern methodology for assessing children’s needs. A cumbersome procedure and low support amounts harm hundreds of children who have been awarded child support by the court, but which is not paid by their parents and is instead paid by the State. The amount of this substitute child support in the 2025 budget is BGN 100 and complaints note that this is highly insufficient to ensure the minimum subsistence level for a child. The Ombudsman explicitly emphasised that changes are needed to the 2026 State Budget Act because it is precisely in that act that the amount of State-paid child support is determined each year.

Parents face a serious problem when enforcing court orders for the handover of children. The Chamber of Private Enforcement Agents (CPEA) notes that this is one of the most complex categories of enforcement proceedings. The procedure has a distinct social and psychological dimension that goes beyond standard enforcement. The lack of sufficiently equipped specialised facilities (“blue rooms”) and the need for closer and more proactive cooperation with social services and psychological support agencies also complicate the process. Last but not least, the existing legal sanctions (fines) often prove to be an insufficient tool against a parent who systematically obstructs personal contact. There is insufficient coordination among institutions – SAA through its regional structures, the MoI authorities and mayors who are also designated as potential participants in the Civil Procedure Code proceedings.

The Ombudsman recommends a new model to resolve parental conflicts, as timely and professional intervention by institutions would help prevent conflicts from escalating. The Ombudsman notes as a positive trend that, in cases of parental conflicts, an increasing number of citizens turn to social services; however, there is still no effective mechanism in place for situations where a parent refuses to use these services and prevents the child from accessing them.

Main recommendations:

1. Conduct a thorough assessment of the child’s best interests on the basis of which the necessary measures and actions are to be determined;
2. Develop a methodology to assess and ensure the best interests of children, enshrined in the current legal framework and applied consistently by experts in the field;

3. Adopt changes to the child protection system that empower social workers and ensure their impartiality and professional approach to cases;
4. Conflict between parents is a major cause of the obstacles that arise regarding contact between the child and the absent parent. The efforts of the authorities need to be directed toward helping to resolve the conflict and facilitating contact;
5. Make it possible for social services staff to take stricter measures, when necessary, against parents who refuse to cooperate with social workers;
6. Provide for the procedural status of social workers in court proceedings, as well as the opinions and reports they submit;
7. Take measures in a timely manner as children are particularly vulnerable in situations of conflict between their parents and it is unacceptable for their childhood to be spent in the midst of such conflict.
8. Take account of the need for early social work with the child's parents to prevent trauma and reduce the risks to the child posed by strained relationships.
9. Examine the implementation of mandatory court-ordered mediation in child custody disputes.
10. Monitor the cases of court-ordered joint exercise of parental rights (shared parenting). Study of the case-law of the Supreme Court of Cassation on the matter.
11. Make changes in the amount of child support paid by the State, as well as in the Ordinance on the Procedure for State Payment of Awarded Child Support because, in its current form, it is extremely cumbersome and leaves hundreds of children without child support.
12. Amend the Civil Procedure Code to ensure closer coordination with child protection authorities and the introduction of mandatory mediation in the early stages of enforcement proceedings.

Rights of children's in cases with an international element

In 2025, there was a definite increase in the number of complaints from citizens involving an international element.

The most common complaints relate to protective measures taken regarding children, such as their removal from their families and placement in various care services. The reasons cited include the lack of financial resources that has jeopardised the children's basic needs, parental conflicts and one parent taking the children out of Bulgaria, the issuance of personal documents for a child in cases where the father's whereabouts are unknown, as well as a report of domestic violence filed during a visit to the family in Turkey, resulting in the children and the mother being immediately placed in a crisis centre.

Bulgarian citizens living abroad with their children most often face complex legal, educational and social challenges:

Legal situations and parental rights

Cross-border disputes: When parents separate, serious conflicts arise regarding parental rights and the child's place of residence. According to EU regulations, if a parent returns to Bulgaria with the child without the other parent's consent, this may be treated as wrongful removal (abduction), and proceedings under the Hague Convention on International Child Abduction will be initiated to secure the child's return.

Intervention of the social services: In some countries, Bulgarian families face a range of protective measures, including the removal of children due to differences in parenting methods or concerns about potential risks.

Most cases involve the actions of child protection authorities in the Federal Republic of Germany, followed by Italy and France. Parents seek support from the Bulgarian consulate and insist that their children be protected as Bulgarian citizens. Support is sought to provide legal assistance and consultation.

What challenges do Bulgarian citizens living abroad with their children face most often?

Lack of access to lawyers and legal aid; Problems with translation and communication with social services, as well as during court proceedings.

Limited contact between parents and children who have been removed from their families.

No report from social services in Bulgaria regarding the presence of close relatives or family members who can care for the children.

Lack of information regarding the steps that can be taken to issue personal documents for a child where one parent is missing.

Although the Ombudsman institution is generally limited by its territorial jurisdiction, in cases involving an international element it always initiates inspection during which it sends recommendations to the Ministry of Foreign Affairs and the Ministry of Justice, urging them to investigate the cases and provide consular and expert support.

These cases highlight the need for better information for Bulgarian citizens who leave the country to settle in another one.

Main recommendations:

1. Develop special guidelines and protocols for consular services abroad regarding cases involving children who are Bulgarian citizens.
2. In cases involving Bulgarian children abroad, the Consul is to attend court hearings as an observer, request information from local authorities and ensure that the rights of the child and the parents are respected.
3. Consular offices are to maintain up-to-date lists of local lawyers who have experience in cases involving social services (e.g., the Jugendamt in Germany or Barnevernet in Norway).
4. Take the opportunity under Article 37 of Regulation (EU) 2019/1111 (for the EU) to transfer jurisdiction: Bulgaria may formally request that the case be transferred to a Bulgarian court if it is established that the child has a closer connection to Bulgaria (e.g., the child has spent most of their life here or has close relatives).
5. The Bulgarian State is to urge the foreign court to place the child with relatives or close family members in Bulgaria (grandparents) rather than with a foster family in the foreign country, in order to preserve the child's national and cultural identity.
6. Analyse the Coordination Mechanisms for Unaccompanied Children or Children at Risk with an International Element which are used by the SACP.

The right of children to protection from all forms of violence

The institution notes with concern the growing number of cases of violence against children and among children. Over the past year, the Ombudsman took action *ex officio* on several occasions in connection with the increasing incidence of violence in school settings. A number of inspections were conducted, specific recommendations were issued and representatives of the institution also participated in inter-institutional coordination meetings with a view to ensuring the protection of children's best interests and bringing them to the fore before those of institutions.

During the reporting year, the Ombudsman called for strengthening psycho-social support by providing a greater number of school psychologists and social workers to work directly with children to help them overcome trauma and manage aggressive behaviour. Schools must become emotionally safe spaces where students have a trusted person to turn to in the event of a conflict with a teacher.

A recommendation was given to introduce a specialised module into classes led by class teachers dedicated to discussions about aggression, bullying and cyberbullying in order to teach the children how to resolve conflicts without resorting to violence.

In 2025, citizens who were victims of domestic violence also turned to the institution. Under the Coordination Mechanism for Assistance and Support to Victims of Domestic Violence, the Ombudsman is one of the bodies to which victims can submit complaints and reports, which are then forwarded to the competent authorities. The Ombudsman's experts often need to advise complainants on the measures they can take in situations of risk or domestic violence. In cases of domestic violence, the Ombudsman notes a lack of trust among citizens towards law enforcement and judicial authorities, leading to the conclusion that measures must be taken to restore trust in these institutions.

The issues referred to the Ombudsman for resolution include:

Gangs and restricting them

The growing number of videos on social media depicting cases of violence against children and among children, particularly against children with developmental disabilities.

Violence and harassment on the streets and on social media

Child abuse involving a child caught in parental conflicts
Lack of effectiveness in the work of child protection agencies
Violence and harassment in the educational environment
Violence against children in public
Aggression against Roma children

Main recommendations:

1. Conduct a national analysis of the school bullying prevention mechanism and identify effective best practices.
2. Introduce restorative approaches and practices in schools as a tool to prevent violence and bullying among students. It is important to recruit staff and train specialists who can implement and promote restorative practices. A model of this type emphasises relationships between people, just as academic progress is valued.
3. Develop a National Concept for Mental Health in Schools with a focus on prevention and early intervention measures.
4. Launch a National Mental Health Campaign in Schools;
5. Provide targeted instruction in social and emotional skills as a key competency in the curriculum, with an emphasis on intrapersonal, interpersonal and resilience skills;
6. Develop special profiles in mobile apps to enable students to consult with specialists;
7. Provide access to school discussion forums on the topics of violence, aggression and cyberbullying;
8. Develop and implement training opportunities, including online courses, for teachers and school staff on children's rights, violence and its various forms and manifestations, bullying and aggression;
9. Implement tools for student feedback on the effectiveness of the Mechanism for Countering Bullying and Violence, such as the use of permanent feedback forms, student self-governance resources, a dedicated chat with school psychologists and specialists.
10. Implement a system to assess regularly the characteristics of the school environment to inform the planning of needs-based measures;
11. Ensure the availability of clearly defined school rules and policies regarding: collaboration with parents, student engagement, prevention of and response to violence through restorative practices and inclusion;
12. Provide a set of best practices and online resources to involve parents as partners in creating a collaborative environment that does not tolerate violence, by establishing active channels for feedback, group work at the classroom level, parent discussion forums, and others.
13. Analyse the work and effectiveness of a Coordination Mechanism for Children at Risk (Articles 36d – 36e of the Child Protection Act).
14. Introduce social work at school to be implemented by a supporting expert
15. Take account of the need for broader support and education for parents and teachers regarding children's online safety.
16. Secure government funding for the operations of the National Centre for a Safer Internet which ensures the protection of children in the digital environment.
17. Build and launch the National Information System for the Prevention and Protection against Domestic Violence.
18. Establish a national hotline for victims of domestic violence.
19. Develop and implement guidelines for the work of school psychologists and educational counsellors.
20. Take account of the need for measures and actions to improve coordination between the education and social welfare systems.
21. Establish a national framework for common regulations and coordinated actions.

Right of children and students to inclusive education

The Ombudsman has affirmed the ongoing commitment to monitoring the process of inclusive education for children and students; the objectives are to conduct a systematic assessment of how inclusive education policies actually function in practice, as well as of the institutional mechanisms that have been put in place. Through investigations conducted in response to specific complaints, the Ombudsman seeks to identify the progress made and persistent challenges, as well as to formulate evidence-based recommendations to improve the quality, equity and coherence of inclusive education.

Children and students with special educational needs

The Ombudsman's Annual Reports consistently highlight the issue of the rights of children with special educational needs as a critical priority, pointing out systemic shortcomings in inclusive education.

The institution received complaints highlighting a number of issues:

Ineffective support and a shortage of specialists (model teachers, psychologists, speech therapists) in some regions of the country, particularly in remote and mountainous areas

Pressure on parents regarding the choice of form of education for their child/student

Refusal to admit students to school

Lack of teaching assistants

Limitations on general education classes for students in individualised instruction

Rude and discriminatory treatment of children at school

Lack of vacancies in special education support centres in Sofia

Lack of communication between parents and teachers

A lack of support for students' personal development on the part of educational professionals

Early school leaving

Parent protests against the presence of children with SEN in classrooms.

In 2025, the Ombudsman received complaints regarding the rights of children with Attention-Deficit/Hyperactivity Disorder (ADHD). There were calls for urgent measures to ensure timely, high-quality and accessible diagnosis for this group of children, and to support children with ADHD and their families in overcoming the symptoms of ADHD and the associated difficulties in personal development, the educational process and social integration. Parents share that for them, every day their child spends in the educational environment is a challenge – “so that the child is not chased out of class, moved around, scolded and stigmatised.” Children need real protection and effective implementation of inclusive education measures.

Complaints from parents who claim they were pressured regarding the choice of educational format, most often to switch their child or student to individualised instruction. It is noted that this constitutes a form of psychological harassment against both the child and the families. Parents emphasise that these actions breach: the right to accessible and inclusive education; the principles of inclusive education as regulated by the Pre-School and School Education Act (PSSEA); the rights of the child guaranteed by the Convention on the Rights of the Child; and the prohibition against discrimination against children on the basis of disability. It is further noted that instead of providing the necessary supportive environment, resource assistance and educational adjustment, the school puts pressure on parents. This creates significant stress, fear and insecurity and jeopardises the mental and emotional well-being of students with SEN.

Main recommendations:

1. Ensure sufficient staffing: Urgently addressing the shortage of model teachers, speech therapists and psychologists, as the current average staffing rate nationwide is only 70%.
2. Unified Registry and Analysis: Establish a unified registry of children receiving additional support and conduct a comprehensive qualitative analysis of conditions in schools and kindergartens.
3. Establish a system to track the ratio of children and students with special needs to the number and type of specialists (model teachers and subject-specific specialists) who meet the requirements for additional support.

4. Teaching assistant: Accelerate the hiring of teaching assistants, particularly for non-verbal children or those with severe physical disabilities, as the profession has now been officially included on the list of vocational education programs.
5. Develop a separate regulatory framework for teaching assistants; the absence of one currently results in the situation that many schools refuse to hire teaching assistants because they must fund them out of their own budgets. As an example, I would cite the development of a separate standard for educational mediators, a measure that has proven to be effective and successful.
6. Psycho-social support: Strengthen the role of school psychologists in the early identification of problems and proactive work with students at risk.
7. Inter-institutional cooperation: Coordinate the measures between MES, MH and MLSP to provide comprehensive support (educational, health and social).
8. Establish a mechanism to coordinate institutional efforts and monitor the quality of specialised and vocational training for students with SEN – from school through to their entry into the labour market.
9. Take steps to develop new methodologies and make effective use of the existing ones for the vocational training of children and young people with SEN, as well as for the training of mentors from the business sector who can create specialised jobs for young people with special needs.
10. Introduce more flexible forms for professional qualification exams, tailored to individual abilities (e.g., extended time limits, individualised assignments).
11. Targeted incentives for businesses to hire students with SEN through tax breaks or subsidies by expanding dual education.
12. Use career guidance for students with SEN that focus on practical skills rather than just theory.
13. Train vocational education teachers to work with children with various challenges and establish systematic methodological support for teachers.
14. Clarify the balance between academic training (which remains the primary focus) and the acquisition of professional skills and skills for independent living.
15. Collection data on students with ADHD who attend kindergartens and schools.
16. Raise awareness and understanding among the general public and teachers about ADHD, thereby helping to combat stigma and discriminatory attitudes toward these children.

Right of children to access to quality healthcare

Protecting the right of children to access to quality healthcare has always been a priority for the Ombudsman. The National Ombudsman defends the right of the child to enjoy the highest attainable standard of health and to health services for treatment and recovery, a right enshrined in the UN Convention on the Rights of the Child, the Charter of Fundamental Rights of the EU and the Bulgarian legislation. The Ombudsman urges the State and its authorities to ensure that all children receive the necessary medical assistance and healthcare, to provide mothers with appropriate care before and after childbirth, and to develop preventive health measures, counselling for parents, and educational activities and services in the field of family planning. The Ombudsman is of the opinion that the respect for the child's opinion must be incorporated into both healthcare and the development of health services.

It should be noted that, in May 2025, an annex to the National Framework Agreement (NFA) was signed, under which the NHIF increased payments for paediatric healthcare and outpatient care. Despite the increased funding, clinical pathways remain unchanged.

In 2025, following a recommendation by the Ombudsman, medical standards for the specialty of Child Psychiatry were drafted and published in the State Gazette.

The Ombudsman has taken an active stance regarding the expansion of access to prenatal care for uninsured pregnant women. The Ombudsman notes the positive changes in Ordinance No. 26 regarding the expansion of the scope of examinations for uninsured pregnant women and the possibility of two hospitalisations during pregnancy in cases of high-risk pregnancies; as well as the introduction of free medications for the treatment of acute infectious diseases in children up to 7 years of age. However, the Ombudsman also acknowledges the numerous difficulties in implementing the Ordinance, an issue that will continue to be examined and for which specific recommendations will be granted. As of early 2026,

four antibiotics and two antiviral medications are available free of charge for children; while insufficient, this represents a step in the right direction.

The lack of paediatric and specialised medical care for children in small towns, as well as outdated and inadequate medical facilities, are among the issues raised by citizens.

Based on a review of policies and measures in the field of child healthcare and in light of the complaints and signals received in this area, it can be concluded that child healthcare still remains outside the government's actual priorities.

Main recommendations:

1. Analyse the barriers to access to obstetric care for uninsured pregnant women and take appropriate measures to address them.
2. Increase the limits for intermittent catheters for patients with spina bifida.
3. Introduce mother- and child-friendly practices in maternity wards.
4. Conduct family planning and awareness campaigns among young people.
5. Implement breastfeeding support campaigns.
6. Expand the scope and quality of routine screening tests for pregnant women and children.
7. Develop support mechanisms in the home environment, including visits by public health nurses for newborns and groups at risk.
8. Take more proactive steps to enter children's data into their electronic records.
9. The building of a modern medical facility providing comprehensive care for children remains a key priority.
10. Improve the capacity of neonatal units and specialised units for premature newborns.
11. Develop community-based mental health services for children and counselling for parents.
12. Provide human, technical and financial resources for the implementation of activities under the National Program for Improving Maternal and Child Health 2021–2030.
13. Encourage the implementation of appropriate medical practices in maternity wards and neonatal units.
14. Ensure the availability of health mediators throughout the country.
15. Develop a national program for children's mental health, allocating adequate resources and including measures for: therapeutic and interdisciplinary community mental health services; providing screening for mental health issues and early prevention services in schools.
16. Expand the scope of children who have access to medical foods for therapeutic purposes.
17. Improve the quality of medical devices.
18. Improve the access to rehabilitation for children with disabilities.
19. Establish effective systems for monitoring key indicators (child mortality, morbidity) to support informed policy decisions.
20. Implement training programs for healthcare professionals on how to treat sick children and their parents with empathy, the lack of which often leads to tension, humiliation and dehumanisation of the process.

Rights of children with disabilities

Complaints regarding children with disabilities are particularly frequent, with most of them arising from changes in legislation and the negative impact these changes often have on the children's rights.

In 2025, the Ombudsman of the Republic of Bulgaria continued to work actively to protect the rights and best interests of children with disabilities and their families.

The findings from the complaints received indicate that a significant number of children with disabilities still face difficulties in receiving the support to which they are entitled in a timely manner due to delays in conducting medical examinations and, in particular, in issuing expert decisions.

To be able to work, live a normal life and dream;

They supplement the income of caregivers and serve as a vital pillar in efforts to ensure a dignified life for children with disabilities in a home and family environment, in accordance with their best interests.

For this reason, their amount should be adequate, reflecting inflation trends in the country, the minimum wage and the various types of pensions under the Social Security Code.

The Ombudsman's position is that these amounts must be updated annually and brought into line with trends in other social indicators that also play a significant role in citizens' social security.

For this very reason, the Ombudsman issued a special recommendation to the Members of Parliament to take steps to update the monthly benefits in accordance with the State Budget Act, as well as to introduce a mechanism for their automatic adjustment.

Main recommendations:

1. Update the monthly benefits for children with disabilities under Article 8e of the FBCA.
2. Provide for a mechanism for their automatic updating.
3. Increase the budget of the National Program for an Accessible Educational Environment so that it covers more schools each year.
4. Develop physical education and sports curricula for students with disabilities.
5. Provide targeted funding for the adaptation of sports facilities, the purchase of equipment and the training of coaches to work with students with disabilities.
6. Do away with the possibility for expert decisions to designate individuals as “unfit for work”, which is a constitutionally guaranteed right.
7. Develop and implement an online platform for career guidance and internships for university students with disabilities.
8. Incorporate mechanisms to monitor the effectiveness of the online platform initiative and engage the business community in supporting young people with disabilities.

Right to a safe and secure public environment – advertising, media, gambling, playgrounds

This year as well the citizens were concerned about the lack of social and cultural infrastructure for children in small towns, the condition of playgrounds, harmful social environments and advertising, the lack of appropriate television programming for children, and children's access to services unsuitable for them through mobile operators; the sale of energy candies and drinks to children, and the sale of cold weapons accessible to children. The complaints include poor urban infrastructure and unsafe or unregulated intersections as some of the most critical points in the road network threatening the children's safety.

The use of e-cigarettes among minors is a cause for concern among citizens, who are urging the Ombudsman institution to keep the issue in the public eye. The social environment is described as aggressive and unsuitable for children.

Citizens express their outrage over sex ads on e-commerce sites and the posting of videos containing “pornographic content”. There are quite a few cases of photos and videos, mostly from TikTok, showing groups of children and young people using nitrous oxide (laughing gas).

Main recommendations:

1. Create a positive urban environment – more bike lanes, playgrounds, outdoor fitness areas and sports fields.
2. Provide free access to sports facilities for children up to 12 years of age.
3. Build facilities suitable for children with disabilities to ensure their right to play alongside their peers.
4. Develop policies that ensure an accessible, safe and inclusive urban environment and public spaces for recreation and leisure for children and families.
5. Conduct annual independent safety audits and monthly visual inspections for broken parts or vandalism.
6. Provide public spaces that are accessible for mass sports and physical activities.
7. Build gyms in all schools and kindergartens across the country.

8. Adopt a media policy for effective protection of children from harmful content in the media.
9. Adhere strictly to the Code of Ethics for the Bulgarian Media, specifically the section on children.
10. Intensify control to detect the sale and use of nitrous oxide (laughing gas) which is prohibited by the law.
11. Organise public events and/or information campaigns to raise awareness of the bans on the use and sale of laughing gas, as well as the actions that can be taken in cases where violations of these bans are detected.

Complaints and signals submitted by children

The Ombudsman makes systematic efforts to raise awareness among children and young people about their right to file complaints and signals. Since Velislava Delcheva took office as Ombudsman, a priority has been to hold meetings with students, discuss specific topics with them and familiarise them with the functions of the National Ombudsman. Specific recommendations and insights shared by the students with the Ombudsman are drawn from each meeting.

In 2025, 10 complaints were filed by children, which, while representing a small percentage of the total number, is an indication of growing trust among children and young people in the National Public Advocate.

A representative of the Ombudsman institution participated in a meeting of the Children's Council at the SACP, during which the young people pointed out that **healthcare and mental health, culture and sports, combating antisocial behaviour, road safety and education** were the five key areas of children's lives in which adults should take serious and urgent measures. As regards the educational process, the Children's Council is of the opinion that more practical subjects are needed, as well as classes on career guidance and emotional intelligence. They are adamant that education is a process involving three parties: parents, children and the school. The effective cooperation among them is key to successful learning. More dialogue and joint initiatives are needed to strengthen trust and facilitate better communication, the children further note.

GENERAL RECOMMENDATIONS:

1. Ensure the right of the child to live in a family environment by developing and implementing policies to support families and the family environment.
2. Implement effective and targeted policies to reduce the number of children at risk of poverty or social exclusion by improving access to education, healthcare, childcare, adequate housing and nutritious food.
3. Income support for families whose children are at risk of social exclusion – single parents, parents of children with disabilities, large families, and families with unemployed parents; social assistance contingent upon responsible parenting.
4. Strengthen effective and collaborative forms of child participation.
5. Make targeted investments in the protection system.
6. Decentralise management and funding in the social sector to local authorities.
7. Continue the reform of the juvenile justice system. Take urgent measures to repeal the Combating Juvenile Antisocial Behaviour Act and ensure that children below the minimum age of criminal liability are not subject to criminal measures, including placement in boarding schools.
8. Accelerate the reform of the juvenile justice system by adopting a Diversion from Criminal Proceedings Act and ensure that it effectively promotes the use of out-of-court measures such as diversion, mediation and psycho-social support for children.
9. Integrate fully the children with SEN in the educational environment, ensuring sufficient specialists, teacher training, adapted curricula and teaching materials.
10. Introduce a standard for psychological support in schools integrate social-emotional learning in all subjects.

11. Establish mechanisms for regional coordination and adopt a cross-sectoral approach to collaboration among the three key sectors – education, healthcare and social policy.
12. Adopt national programs with adequate resources and funding to support and integrate young people who have left residential care.
13. Adopt more effective measures against the sexual exploitation and abuse of children in the digital environment.
14. Encourage children’s participation by developing various forms.
15. Create safe spaces and an environment that fosters participation; ensure a safe and tolerant environment where children can express their opinions without fear of judgment.
16. National Strategy for Children (2025–2030): Finalize and apply effectively the new strategy which places children at the centre of policy and ensures cross-sectoral coordination.
17. Introduce mandatory procedures to assess the impact on children’s rights for every new legislative proposal or administrative decision.
18. Improve the reception conditions for unaccompanied children and ensure access to education and healthcare without discrimination.

VI. RIGHT TO HEALTHCARE

Healthcare has traditionally been a sensitive issue for the citizens who expect completely free and guaranteed access to medical services, pharmaceuticals, medical devices and medical foods.

Despite the steady increase in healthcare funding in recent years, which has not been accompanied by substantial reforms, the system still faces serious problems that cannot be put off any longer.

There is a high level of out-of-pocket expenses borne by patients and their families – not only for medications, but also for medical devices that are not covered or are insufficiently covered by the NHIF, palliative care and healthcare for people with severe disabilities, among other things. There is a need to develop a long-term strategy and measures to address these issues and ensure the rights of the citizens as patients and insured individuals.

The report was prepared on the basis of an in-depth analysis of the complaints and signals received by the Ombudsman institution, which include both individual and collective complaints accompanied by petitions, as well as those submitted by non-governmental organisations – patient, professional organisations, and organisations of people with disabilities – outlining the issues raised and expectations for their resolution.

Complaints and signals of rights violations in healthcare

The number of complaints and signals received by the Ombudsman institution during the year concerning healthcare rights was 426. It should also be noted that, following the election of the Ombudsman in 2025, the number of complaints and signals increased sharply, a trend that continued into 2026. An additional **2453** citizens sought the Ombudsman’s assistance through petitions.

The highest number of complaints and signals concern medical examinations – 95, followed by the quality of medical care – 92, access to medical care – 61, access to medicines, medical devices and dietary foods for special medical purposes – 56, health insurance rights – 36, access to health information – 24, promotion and prophylaxis, immunisations and health control – 3, other matters – 59, including labour, professional and occupational rights; concerning social and other rights; containing no specific request; outside the Ombudsman’s jurisdiction, etc.

Table No. 8 *Number of complaints and signals in healthcare for the period 2023-2025*

Rights in healthcare	2023	2024	2025
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2025 ANNUAL ACTIVITY REPORT

Expert medical examinations	175	68	95
Quality of medical services	60	82	92
Access to medical services	56	204	61
Access to medicinal products, medical devices and dietetic foods	318	173	36
Health insurance rights	33	38	36
Promotion and prophylaxis, immunisation, health control	8	6	3
Access to health information	4	21	24
Other	122	73	56

It should be noted that a significant number of complaints and signals raise more than one issue; for statistical purposes, only the primary issue has been included in the figures above.

Complaints and signals, whether accompanied by a petition or submitted by civil society organisations, concern the rights of large groups of people. At the same time, many individual complaints raise issues that affect the rights of many citizens.

In connection with 241 (57%) of the complaints and signals, recommendations were issued to the authorities and institutions responsible for addressing and resolving the issues (often to more than one), the majority of which have been fully or partially implemented.

In accordance with the Ombudsman's recommendations, inspections were conducted, the issues raised were examined and assistance was provided to citizens, where legally possible. Where violations were found by the supervisory authorities, administrative penalty proceedings were initiated; in some cases, no violations were found, but the existence of a problem was confirmed and, in accordance with the actions recommended by the Ombudsman, measures to resolve it were discussed and implemented. Assistance was provided to citizens regarding the issues they raised.

Expert medical examinations

Assessment of permanently reduced work capacity/type and degree of disability

- **Complaints and signals regarding disagreement with decisions of the Territorial Expert Medical Commissions (TEMC).** An analysis of the complaints and signals regarding TEMC decisions revealed that the reasons included inadequate preparation and incompleteness of medical documentation. This is also confirmed by cases in which the NEMC overturns and remands expert decisions.

- **Delays in the medical examination process, primarily by the National Expert Medical Commission (NEMC)** due to the increased number of appeals against TEMC decisions and staffing constraints.

- **Access to information.** Citizens who do not have access to the medical examination information system report difficulties they encounter in obtaining information from the regional medical examination registries (RMER), TEMC and NEMC.

- **Appeals by the National Social Security Institute (NSSI).** As in previous years, citizens also express dissatisfaction with appeals, often based on unclear grounds, against their expert decisions.

Expert medical examinations and benefits for temporary disability

- **Delays in decisions by the NEMC regarding sick leave certificates.** It leaves insured individuals without their sole source of income until the assessment is completed, creating uncertainty and making it impossible for them to justify their absence from work.

- **Sick leave to care for children.** Parents face difficulties in obtaining sick leave certificates to care for frequently ill children, including the requirement to appear before a Medical Advisory Commission (MAC) and TEMC. A special case involves the issuance of sick leave certificates for the care for children by parents who have taken extended leave for themselves due to temporary incapacity to work.

- **Limit on sick leave pay for child care.** The 60-calendar-day limit to care for sick children under the age of 18 under the Social Security Code is insufficient for single parents and children who are frequently ill.

Recommendations

1. Analyse the causes and discuss measures to expedite the assessment process by the NEMC, including an increase in staff.
2. Reassess the restrictions set forth in the Social Security Code regarding the payment of benefits for caring for a sick family member, with priority given to children, and the extension of such benefits.
3. Adopt measures to improve the citizens' access to information regarding the progress of their expert medical evaluation.

Quality of medical care

In 2025, there was an increase in the number of complaints regarding the scope and quality of medical care provided, including dental care.

Complaints are filed at every level of the system. Relatives of deceased patients express doubts about omissions and errors committed by doctors. They are often dissatisfied with the responses from regulatory authorities – they believe that they have sided with the doctors and have not fully accepted the facts and circumstances described in their complaints.

The inspections of regulatory bodies and healthcare facility directors recommended by the Ombudsman were carried out, and where shortcomings and violations were identified, the sanctions provided for by law were imposed. It should be noted that the violations identified do not always correspond to those reported by citizens.

- There as an increased workload at the Medical Supervision Executive Agency and delays in proceedings.

- Lack of tailored treatment, ethical and moral issues in the doctor-patient relations, including with regard to patients with cancer, lack of empathy and compassion, failure to provide sufficient and understandable information, etc.

The Ombudsman's position is that an in-depth analysis of the causes is needed as well as a discussion of changes in the funding mechanism and the establishment of objective and effective ongoing control, taking into account the quality of care and patient satisfaction.

- Pressure to pay extra. Complaints from insured individuals and their relatives who report that they were pressured to “choose” and, respectively, pay for additional services requested and who express strong disagreement with this practice.

As a result of the recommendations made in this regard, the regulatory authorities took action; however, the Ombudsman believes that a solution must be found to ensure that the choice of such services is truly voluntary.

In all of the cases mentioned above, the citizens also received advice from the Ombudsman on possible courses of action, including the option to receive free primary legal aid.

- The shortage of healthcare professionals, their age, heavy workload and burnout are among the reasons for the decline in the quality of medical services and healthcare, and measures are needed to address this problem.

Recommendations:

1. Strengthen the oversight of healthcare institutions, including regarding the provision of additional services and preventing instances of coercion.
2. Change the system for reimbursing hospitals, linking financial performance to quality and patient satisfaction.
3. Ensure comprehensive inpatient care.
4. Adopt a long-term strategy and plan to facilitate the training and retention of healthcare professionals and young doctors in the country.

Access to medical assistance

Emergency medical assistance

- **Delay in the arrival of the teams of emergency medical assistance centres (EMAC).** The most common causes are related to staff shortages, as well as triage that does not reflect the patients' actual condition.

- **Refusals of hospitalisation.** Citizens also report that hospitals refused to admit patients on an emergency basis, including those transported by ambulance by emergency medical teams.

- **Payment in emergency structures.** Last but not least, citizens who visited emergency rooms or hospital emergency wards on their own report that they were required to pay for examinations and tests, with the explanation that their condition was not an emergency – a claim with which they disagree.

- **Lack of paediatric emergency rooms.** The analysis shows that establishing such rooms is not mandatory, and that the existing ones are few in number and heavily overburdened.

- **Failure to provide emergency care outside of doctors' working hours.** Citizens call 112 or visit hospital emergency wards for help, including in non-emergency cases that are overburdening the country's emergency medical services.

Primary and specialised outpatient care

- **Refusals by primary general practitioners to accept new patients.**

In this regard, it should be noted that the law does not provide for the possibility for a general practitioner to refuse to register a patient with health insurance but, at the same time, no penalties are provided for in cases of refusal.

- **Discontent over referral limits.**

The Ombudsman institution has repeatedly emphasised the need to eliminate limits on outpatient and inpatient medical care.

- **Refusals of home visits by general practitioners and, more often, by specialists.**

In the cases mentioned above, following the Ombudsman's recommendations and intermediation, assistance was provided to citizens; however, there is a need to discuss and take measures to address these issues, including through control.

- **Limited access to qualified specialists, available only for a fee** which has led many citizens to express their dissatisfaction with the amount of the payments.

- **Patients do not have access to an adequate level of healthcare** in outpatient care. Such care, provided through outpatient clinics as regulated by the Healthcare Institutions Act, is primarily provided on a fee-for-service basis.

Hospital medical care

- **Uneven distribution of hospitals across the country.** As a result, patients with limited mobility and serious illnesses from small and remote communities face difficulties accessing hospital care.

- **Lack of beds for follow-up care, long-term treatment, and rehabilitation** as well as for palliative and healthcare services, at the expense of the large number of beds for acute care.

The analysis shows that, once their active treatment is completed, patients have limited options to continue their treatment at medical institutions and have it covered by public funds, and are forced to pay for their stay out of pocket.

- **Limited access to hospices and medical-social care facilities for adults.** According to the citizens, the medical services advertised at the hospices are not actually provided, and the fees are high. They are forced to use the services of residential care facilities for adults which, however, are not medical institutions and do not always provide adequate conditions for medical supervision and healthcare.

The Ombudsman believes that the shortage of medical institutions, the failure to fund their operations with public funds and the insufficient control breach the rights of patients and their families, and that measures to address these issues must be discussed and implemented in the near future.

- **Access to health information.** Complaints and signals were received from citizens regarding their inability to access health information about their relatives. They also expressed dissatisfaction with the fees imposed by some medical institutions. The Ombudsman assisted them in obtaining such information.

Recommendations:

1. Increase the capacity of emergency medical services in the country.
2. Exercise actual control over the compliance with the work schedules of outpatient care physicians regarding home visits.
3. Ensure public funding for long-term treatment and rehabilitation of sufficient duration, as well as palliative and home healthcare.
4. Apply measures to ensure that residents of small and remote communities have access to primary and emergency medical care.
5. Discuss a strategy to ensure 24/7 access to medical care for children.

Access to medicinal products, medical devices and foods for special medical purposes

Medicinal products

• **Lack and shortages of medications as well as certain medical devices and supplies, in the pharmacy network.**

It is deeply concerning that the list of missing medications includes life-saving drugs and such with no equivalents on the market. Citizens point out that these same medications are available in other countries.

In response to the recommendations made by the Ombudsman, the Ministry of Health (MH) and the Executive Agency for Medicines (EAM) have provided information on the results of the inspections conducted. The Ombudsman, however, believes that mechanisms should be found to ensure the availability of the missing products.

• **Expert evaluations pursuant to Article 78, item 2 of the Health Insurance Act (HIA).** The medical evaluation process and the related requirements imposed by the NHIF are subject of complaints from citizens. They also express dissatisfaction with the procedure for conducting the evaluation, including the requirement for hospitalisation and evaluation by committees located only in certain university hospitals.

Recommendations have been made to the NHIF regarding each complaint. Unfortunately, the responses have provided information on the reasons for the denial, with the vast majority citing medical criteria set forth in the requirements.

• **Procedure for prescribing and receiving medications.** The most frequently raised issue concerns the rules for prescribing medications in packages containing a non-standard number of dosage forms, as well as the inability to issue prescriptions without an examination.

• **Non-reimbursement from public funds of medicinal products authorised for use in the country but administered outside the terms of their marketing authorisation.**

In this regard, the Ombudsman believes it is appropriate to reconsider the aforementioned ban in order to safeguard patients' rights, which are often vital to their treatment. Failure to pay puts citizens who lack the necessary funds at risk and violates their rights as patients.

Medicinal products, medical devices, medicinal food

• **Non-payment or underpayment.** Examples are intraocular lenses, spinal implants, expensive consumables used in endoscopic surgeries, dental prosthetics, intermittent catheters, and others.

• **A complex procedure to add new medical devices or increase the reimbursement rates set by the NHIF,** including proposals from civil society organisations.

The Ombudsman believes that failing to cover these costs with public funds, or covering them only partially, puts citizens who lack the necessary funds at risk and violates their rights as patients and health insured individuals.

• **Tumor biomarker diagnostics and its coverage by the NHIF.**

Despite the recommendations made and the assurances received in response from the MH and the NHIF that the necessary steps had been taken, the problem had still not been fully resolved.

• **Non-payment by the NHIF for custom-made products – scoliosis braces for children.** Despite several recommendations made to both the MH and the NHIF, the problem remains unresolved, and the rights of children in need of this treatment remain at risk.

Recommendations:

1. Analyse periodically and discuss measures to prevent the lack and shortage of medications and medical devices in the pharmacy network, as well as a flexible mechanism for their timely provision, with the participation of the State.
2. Expand the scope of public funding for the use of medicinal products outside the terms of their marketing authorisation.
3. Simplify the procedures for prescribing and obtaining high-cost medications subject to review by the NHIF.
3. Reduce the patient's out-of-pocket costs for medical devices and high-cost supplies.
4. Ensure access to biomarker-based diagnostics for all patients with cancer.

Health insurance rights

The Ombudsman has been approached by long-term unemployed citizens and their relatives who express **disagreement with the requirement to pay their own social security contributions**, emphasising that they lack the income to do so. There are also calls to reduce the amounts required to reinstate suspended health insurance coverage.

In response, the Ombudsman informed them about the categories of persons whose insurance is covered by the State, as well as about medical services provided outside the scope of mandatory health insurance. Where possible, assistance was provided.

• **Delayed restoration of rights for Bulgarian citizens who have returned to the country permanently.** Despite the introduction of electronic exchange of social security information within the EU, there are cases of delays in the restoration of health insurance rights following employment and residence in another European country.

A solution must be found to ensure that citizens have access to adequate medical services until the form is received.

• **Fee for a medical certificate for children.** Parents are strongly dissatisfied with the fee that has been introduced, although not all doctors are charging it.

In response to the recommendations made by the Ombudsman to the MH and the NHIF in this regard, information was received indicating that not all stakeholders had given their consent.

However, the Ombudsman believes and insists that the issuance of a medical certificate for a child or a student who is absent from a childcare facility or a school due to illness should be completely free of charge for the children and their parents.

• **Delayed approval of treatment abroad** as well as the reimbursement of amounts already paid. Following recommendations sent by the Ombudsman institution to the NHIF, the reasons for the delay were clarified in the response, and where necessary, timely assistance was provided to organise and carry out the treatment.

• **Amounts due for past periods upon retirement.** Citizens who are eligible for a pension, whether based on disability, length of service or age, point out that, although they are now covered by the state health insurance system, they are unable to access the medical care they need because they owe amounts for past periods.

The Ombudsman believes it is appropriate to consider, even if only a partial solution to this problem, given these individuals' increased need for timely access to medical services.

Recommendations:

1. Provide for an accessible possibility for citizens who have become eligible for a disability pension and whose health insurance coverage has been suspended to reinstate it immediately.
2. Discuss the options to expand the scope of the individuals covered by the State.
3. Discuss a mechanism to allow citizens who have permanently returned to the country, and for whom there is evidence that they were insured in another EU country, but whose officially requested form is delayed, to access medical services.
4. Speed up the approval process for reimbursement of medical treatment costs for Bulgarian citizens abroad.
5. The issuance of a medical certificate for a child or a student who is absent from daycare or school due to illness is to be free of charge for the children and their parents.

Recalling that changes to the healthcare system, a topic of great concern to citizens, should be implemented with broad public agreement and consensus, while respecting the rights of all stakeholders, with a focus on the rights of citizens as patients and insured persons, the Ombudsman makes the following general recommendations.

General recommendations:

1. Pursue a comprehensive patient-centred reform in the sector.
2. Implement a strategy and a plan to ensure equal access to healthcare for people across the country, involving objective planning of the distribution of medical and healthcare facilities throughout the country, based on in-depth analysis.
3. Strengthen the quality control in measuring patient satisfaction.
4. Make steps toward completely free children’s healthcare.
5. Implement a strategy and measures to reduce out-of-pocket costs for patients and prevent instances of coercion.
6. Increase the reimbursement rates and covering the costs of new drugs, medical devices and foods for special medical purposes.
7. provide public funding for palliative and medical care, follow-up care, long-term treatment and rehabilitation.
8. Discuss comprehensive measures to address the lack and shortage of medications, as well as medical devices and dietary foods.
9. Speed up the medical evaluations by NEMC and improve the quality of evaluations by TEMCs.
10. Provide accessible opportunities for young doctors to specialise, and a strategy for training them and retaining them in the country as healthcare professionals.
11. Strengthen the promotional and preventive activities and expand the range of screening tests for disease prevention and early detection.

VII. SOCIAL RIGHTS

In 2025, the Ombudsman institution continued its active work to protect the citizens’ social and economic rights, with a focus on labour rights, pension rights and access to social support and services. In addition to its advocacy role, the institution actively participates in institutional dialogue and makes proposals for regulatory changes.

The dynamics of the complaints received shows that, despite a slight decline in the total number compared to previous years, social issues remain significant. In addition to the total number of complaints, 178 citizens who submitted petitions to the Ombudsman should also be included.

Table No. 9 *Number of complaints and signals related to the protection of social rights by types for the period 2023-2025*

Category	2023	2024	2025
Total social rights	1134	727	693
Labour rights	256	162	242
Pension rights	326	139	215
Social security	468	403	345

There has been an **increase in complaints regarding labour and pension rights**, indicating heightened tensions in these areas. A significant factor that influenced the social environment in 2025 was the process of preparing for the **introduction of the euro**. Although the regulatory framework provides for consumer protection mechanisms, a large portion of citizens expressed concerns about rising prices and a decline in purchasing power. This led to an increase in the complaints related to

consumer rights, banking services and dual marking of prices. In this context, the Ombudsman stepped up oversight of currency conversion practices and insisted on transparency in informing the citizens.

Major social issues

The analysis of the complaints highlights several recurring problem areas:

1. Violations of labour rights. Citizens report unpaid or delayed wages, wrongful dismissals, violations in the imposition of disciplinary sanctions, and problems accessing employment.

2. Workplace harassment (mobbing): There has been a growing number of complaints regarding psychological pressure, the isolation of employees and the abuse of managerial authority. These complaints come from both private-sector employees and civil servants.

3. Pension issues: The main complaints concern the low level of pensions, delays in their payment and difficulties in recognising periods of insurance coverage.

4. Limited access to social support: Citizens report low levels of social assistance, complex administrative procedures and insufficient access to social services.

5. Housing issues: The shortage of municipal housing and the difficulty in accessing social housing remain a serious problem.

Labour rights

In 2025, there were **242 complaints** related to labour rights which is significant increase compared to 2024. The most common issues are:

- Labour disputes – 59 complaints;
- Unpaid wages and benefits – 55 complaints;
- Difficulties in accessing employment – 29 complaints;
- Cases of workplace harassment and abuse of authority.

Also on the rise is the number of complaints related to **psychological pressure and an unfavourable work environment**, indicating that citizens are increasingly concerned about the protection of human dignity in the labour relations. The Ombudsman provides assistance through:

- Legal advice on the protection of labour rights;
- Referral to courts;
- Recommendations for employers and regulatory authorities;
- Assistance to obtain legal aid.

Particular attention has been paid to the issue of **additional compensation for length of service and professional experience** in the public administration. The Ombudsman emphasises the need to ensure that this compensation is guaranteed to employees under civil service contracts.

Pension rights

In 2025, **215 complaints** were filed regarding pension rights. The main issues are:

- Low pension levels – a problem that has been consistently identified over the years;
- Delays in the payment of pensions;
- Difficulties in recognising social security service;
- Problems with the exchange of information between countries, primarily from Greece and Spain over the years, and specifically from the Russian Federation in 2025 .

The issue of the minimum pension is particularly serious; in 2025, it stands at BGN 630,50, while the poverty line is BGN 638.

Another contentious issue is the **maximum pension amount (“cap”) of BGN 3400**, which, according to the Ombudsman, no longer serves its original purpose and should be abolished.

Social support and social services

In 2025, **129 complaints** related to social rights were filed. The main issues are:

- Low levels of social benefits;
- Administrative barriers;
- Limited access to social services;
- Lack of affordable housing.

In the area of social security, **126 complaints** were received, mainly related to:

- Unemployment compensation – 69;

- Maternity – 28;
- Temporary unfitness to work – 22.

Particularly strong dissatisfaction was expressed regarding the **allowance for caring for children up to 2 years of age** which remained BGN 780 and had not increased in recent years.

Social assistance and housing problems

Citizens often turn to the Ombudsman for assistance with:

- Denials of social benefits;
- Targeted heating assistance;
- Placement in municipal housing.

Particularly problematic is the application of the requirement that applicants for heating assistance **must not operate as sole traders** since many people have registered but inactive businesses.

In 2025, **63 complaints** were filed regarding municipal housing. The main issues are:

- Lack of sufficient housing stock;
- Risk of removal from vulnerable families;
- Unclear placement criteria.

Main recommendations:

1. Make the minimum pension equal to or higher than the poverty line;
2. Remove the pension cap;
3. Adjust pensions annually;
4. Increase the allowance for caring for children;
5. Reduce the administrative burden through electronic data exchange between institutions;
6. Ensure stricter control over breaches of labour rights;
7. Increasing the social assistance and heating benefits;
8. Expand the municipal housing stock.

VIII. RIGHT TO PROPERTY AND ECONOMIC FREEDOM

In 2025, the Ombudsman institution received **941** complaints and signals related to the protection of the right to property. An additional **7667** citizens submitted petitions to the Ombudsman regarding violations of property rights and economic freedoms.

The analysis of the complaints identifies several main categories based on the rights affected: restrictions on or changes to property regimes through zoning plans and their amendments; illegal construction; deficiencies in cadastral and registration activities resulting in uncertainty regarding real rights; expropriation procedures concerning the adequacy and timeliness of compensation; violations of rights to agricultural and forest properties; difficulties in exercising rights under the condominium regime.

Issues impacting on the right to property in procedures for the creation, notification, approval and implementation of general and detailed development plans (GDP and DDP)

Most often, the complaints concern: increasing the density of development in existing residential complexes by building on spaces between buildings and green areas; designating regulated land plots (RLPs) for development using the maximum permissible planning parameters; formal or absent public consultation; allowing procedures to proceed without clarified development parameters and without the necessary approvals; delays in procedures for the preparation and approval of DDPs; imposing conditions for the donation of portions of properties falling within street regulation. In a number of cases, citizens express legitimate concerns about the consequences for the living environment resulting from a deterioration of the microclimate, increased traffic, overburdening of social infrastructure and a lasting decline in quality of life.

The practice continues, in the restructuring of residential complexes, to plan undeveloped spaces based on the maximum permissible planning parameters and without assessing the cumulative impact on the environment and social infrastructure.

Lack of effective public participation in spatial development processes. The latest extension of the deadline for adopting a GDP to 31 December 2028 (§ 25 of the Transitional and Final Provisions of the Act to Amend the Spatial Development Act, published in the State Gazette No. 87 of 2025) creates a risk of chaotic development without a comprehensive vision for the territory's development and discourages local authorities from adopting their own GDPs.

Unlawful practices in street planning, in which property owners are required to “donate” portions of their properties affected by street planning as a prerequisite for approval of the DDP.

Recommendations:

Tie the state subsidy for the preparation of a GDP (in accordance with the rules of the Ministry of Regional Development and Public Works) to specific timelines for public consultations and coordination procedures, with a view to finalising the plans by 31 December 2028.

Introduce stricter criteria for the approval of partial amendments in municipalities that are in the process of developing a GDP, in order to prevent the irreversible development of green spaces and sites designated for public infrastructure.

Ensure balanced urban planning decisions when designating individual RLPs with restored ownership rights within existing residential complexes, taking into account the public interest and quality of life.

Do not allow a requirement to “donate” portions of property as a condition for the preparation of a DDP; expropriation should be carried out only in exchange for prior and adequate compensation.

Administrative authorities need to review urban planning proposals submitted at the initiative of citizens within the time limits established by the law, in accordance with the principles of expediency, procedural economy and transparency, pursuant to Article 11 and Article 12, para 1 of the Administrative Procedure Code.

Other problems related to spatial development

The Ombudsman is sought by citizens whose rights have been infringed upon in relation to: lack of pedestrian and vehicular access to their properties; administrative inaction regarding the construction and maintenance of technical infrastructure networks and facilities; failure to implement street regulation plans; unimproved surrounding areas and a shortage of social infrastructure facilities; construction activities undertaken in violation of approved DDPs.

The inaction of local authorities in enforcing street regulations and constructing technical infrastructure directly infringes upon property rights by limiting the ability to actually use and access properties. The prolonged absence of paved streets, street lighting, water supply and sewerage also infringes upon the citizens' right to a healthy and favourable living environment, as well as their right to freedom of movement and security.

Particularly alarming are cases where access to emergency medical care and fire services is difficult or impossible, which puts the right to life and health at risk. The lack of budgetary funds is often cited as a reason for failing to fulfill obligations; however, this does not relieve the public authorities of their responsibility to guarantee fundamental rights and minimum standards for the living environment. Carrying out construction activities in violation of existing spatial development plans creates uncertainty and undermines the confidence in legal stability and the predictability of administrative decisions.

Recommendations:

The expropriation procedures for properties designated for public use need to be carried out within a reasonable time after the DDP enters into force, subject to prior and equitable compensation.

Ensure transport accessibility, including for specialised services, as part of protecting the lives and health of citizens.

In their investment programs, municipalities need to prioritize areas that have long lacked basic infrastructure based on objective criteria and they also need to monitor strictly the compliance of construction activities with existing plans and maps.

Strengthen the control to prevent repairs, renovations and other construction activities on public state and municipal property that conflict with the development plans and cadastral maps currently in effect.

Rights affected in procedures for the creation and maintenance of cadastral maps and cadastral registers (CMCR) of real estate properties

Complaints: omissions and errors in CMCR; municipalities do not submit effective DDPs to the Agency for Geodesy, Cartography and Cadastre (AGCC); delays in procedures for creating and amending the CMCR; shifting the financial burden of corrections onto property owners.

It has been found that some municipal administrations fail to fulfill their obligation under the Spatial Development Act to submit automatically to the AGCC the DDPs that have entered into force and their amendments, which results in the CMCR becoming outdated and affects the rights of property owners, as well as the reflection of changes in the street network. The timely recording of municipal property in the CMCR is neglected, as actions are often taken only when there are specific investment intentions or dispositions regarding properties.

It has also been found that the deadlines set forth in the Cadastre and Property Register Act for the adoption of draft CMCR, the review of objections, the implementation of amendments and their final approval were not met. The amendments to the Cadastre and Property Register Act (published in the State Gazette No. 91 of 7 November 2025, in effect as of 9 February 2026) introduce a new service delivery model aimed at digitisation, centralising operations within the AGCC and reducing the administrative burden. The practical implementation of the reform and its impact on the quality of administrative services remain to be monitored.

Recommendations:

Given the importance of cadastral information as an official database for real estate, the maintenance of CMCR must be carried out in accordance with high standards of accuracy, timeliness and accessibility, consistent with the principles of legality, the *ex officio* principle and the protection of reasonable legitimate expectations.

All changes to real estate properties occurring between the adoption and approval of CMCR must be promptly recorded by the OGCC, with municipal administrations submitting the data in accordance with § 4, para 2 of the Transitional and Final Provisions of the Cadastre and Property Register Act – within seven days of their inclusion in the updated plans.

Municipalities need to submit promptly information to the AGCC and initiate procedures to register municipally owned properties, in accordance with the simplified procedure introduced by the latest amendments to the Cadastre and Property Register Act.

The citizens have the right to accurate and accessible cadastral information without additional costs for the correction of errors made by the authorities. Pursuant to Article 40 of the Cadastre and Property Register Act, costs are borne by the owners only in exceptional cases, and errors caused by the administration or the contractor are corrected free of charge.

Rights breached in connection with illegal construction

Complaints: administrative inaction or formal checks in response to reports of illegal, substandard or dangerous construction, as well as refusals to initiate proceedings under Article 225a of the Spatial Development Act when there is evidence of a violation. Such practices call into question the effectiveness of preventive and enforcement controls and create a sense of inequality in the application of the law.

The issue of legality and proportionality in the enforcement of demolition orders is particularly sensitive when it concerns one's sole residence.

Regardless of the current regulatory framework, no significant progress has been made in terms of preventive and timely control. Inspections continue to be initiated primarily in response to complaints and signals from citizens, which calls into question the effectiveness of *ex officio* control and systematic monitoring of construction activities.

Recommendations:

In order to ensure transparency and legal certainty, to strike a fair balance between the public interest and the protection of individual rights, and to enhance the effectiveness of construction oversight, it is necessary to:

- Ensure regulatory improvement through a comprehensive and systematic approach to the regulation of public relations in the field of investment design and construction, aimed at overcoming piecemeal changes and ensuring the stability and consistency of the legal framework;
- Introduce and implement systematic preventive and ongoing control based on the principle of *ex officio* action, risk analysis and coordination among the competent authorities in order to identify violations promptly and prevent them;
- Strengthen the administrative capacity of regulatory and licensing authorities by enhancing their expertise, digitising processes and establishing clear standards for accountability and responsibility.

Application of the principle of proportionality and Article 8 of the ECHR in cases of demolition and eviction from one's sole residence by municipal and state authorities

In 2025, the Ombudsman institution continued to receive signals regarding the forced eviction of citizens from their only homes based on eviction orders or orders to demolish structures deemed illegal and dangerous. This practice raises the question of whether these measures comply with the principle of proportionality and the requirements of Article 8 of the European Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR), which guarantees the right to respect for private and family life and the home.

In a statement sent to the relevant government and municipal authorities, the Ombudsman emphasises the need for strict application of the principle of proportionality under Article 6 of the Administrative Procedure Code, especially when it concerns one's sole residence, as well as compliance with the guarantees under Article 8 of the ECHR. Emphasis is also placed on the obligation for coordination among child protection authorities to prevent children and their families from being placed in a situation of distress in breach of Article 3 of the Convention.

Recommendations:

The Ombudsman reiterates the recommendation to prioritise the resumption of legislative work and to introduce explicit safeguards to ensure an effective and case-by-case assessment of the proportionality of removal and eviction measures when such measures result in the affected person being deprived of their sole residence.

The Ombudsman in protection of the citizens' rights in land relations

Breach of property rights regarding agricultural and forest land

Findings regarding uncompleted land restitution

The complaints from citizens and their associations regarding unresolved restitution and compensation proceedings for agricultural and forest properties remain a constant feature of the complaints submitted to the Ombudsman.

The removal of restrictions on municipalities' disposal of land from the residual land fund, without progress in the enforcement of recognised restitution rights (to restoration and compensation), allows for dispositive transactions in favour of third parties regarding lands for which the identification of boundaries is expected (by the owners or *ex officio* in accordance with the provisions of Draft Act No. 47-202-01-31/2 June 2022), which is why the legitimate legal expectations of citizens with recognised rights within the old boundaries to receive land may remain unfulfilled.

General recommendations to complete the land restitution

Provide for a special legal framework to complete the land restitution in order to resolve the issues related to the restoration of ownership and compensation for agricultural landowners, including those arising from excessive delays, in accordance with the general measures ordered by the European Court of Human Rights (ECtHR); It is common practice to adopt separate laws to complete the land restitution in accordance with the recommendations of the ECtHR.

The State needs to provide funding for the technical activities necessary to complete the restitution procedures.

Restitution issues need to be taken into account when regulating land relations, including: a) the removal of restrictions on the disposal of land from the municipal land fund designated for restitution purposes; b) requests by owners to extend the deadline for filing restitution claims regarding agricultural and forest properties.

The Ombudsman and the protection of affected rights in land use

In summary, the complaints submitted to the Ombudsman are directed against the widespread practice of large-scale users imposing contractual terms, misusing jointly owned agricultural land, failing to pay the contractual fees for land use, while simultaneously retaining all their rights to receive area-based subsidies under Common Agricultural Policy (CAP) schemes, measures and interventions precisely on the basis of the contracts concluded but not fulfilled with the landowners.

When regulating the use of agricultural land, account should be taken of the interests of all parties involved in land relations whose economic standing is not equal by introducing additional regulatory mechanisms to protect small landowners and users – the “weaker” party in land relations – with the aim of ensuring a fair distribution of the benefits derived from agricultural land and the support associated with its use under the schemes, measures, and interventions within the CAP framework.

Recommendations to overcome inequalities in land relations:

To restore the balance disrupted by the monopolisation of land relations, it is imperative to strengthen further the regulatory functions of the State by introducing:

- Adequate taxation of large landholdings;
- Restrictions on the ownership and use of agricultural land;
- Easier access to land for landless and low-income citizens;
- Minimum rent/lease payments;
- Aligning the average rent payment for “white spots” with market rent;
- Tying the granting of area-based subsidies to the payment of rent to landowners under land-use agreements;
- Strengthening control to ensure compliance with the special legal requirements when entering into contracts for the use of agricultural land;
- Out-of-court dispute resolution regarding payments for the use of agricultural land.

Other problems of property

Expropriation and compensation procedures

The citizens’ complaints regarding violations of property rights in the expropriation of real estate for state or municipal purposes are primarily directed against the application of the prices laid down in the Ordinance on the Procedure for Determining Agricultural Land Prices when appraising the expropriated properties. This valuation method is contested as the main cause of the inequity in compensation.

The constitutional right to property in expropriation and compensation procedures requires additional legal safeguards – the right to fair compensation is granted to owners who challenge the amount determined in court, including for compensation determined after the entry into force of the increased base prices for agricultural land.

Despite the progress achieved, the current system for valuing agricultural land expropriated for public use does not fully ensure compliance with the constitutional requirement for equivalent compensation under Article 17, para 5, nor does it ensure a balance between public and private interests.

Recommendations:

Develop a comprehensive and systematic approach to regulating public relations concerning compensation for property owners in cases of expropriation for state and municipal purposes, in accordance with constitutional and international legal standards, in order to address the emerging discrepancy in the amount of compensation determined through administrative procedures, with the case-law of the ECtHR.

It is not speed (which is unambiguously equated with the public interest in the prompt fulfilment of state or municipal needs), but rather the protection of the right to fair compensation that should be prioritised, and the two-instance system of administrative court proceedings should be restored when challenging expropriation acts, which will also allow for the harmonisation of judicial practice.

Provide for the procedures for paying compensation to owners of expropriated properties and standardise administrative practices in order to put an end to unlawful delays in payments and to prevent the shifting of the administrative and financial burden of obtaining documents to the expropriated owners.

IX. RIGHT TO A HEALTHY AND FAVOURABLE ENVIRONMENT

In 2025, the Ombudsman institution received a total of 356 complaints and signals from citizens, initiative committees and environmental organisations. The complaints cover the following main areas: changes in the designated use of agricultural and other lands for the implementation of: energy projects, including facilities for the production of electricity from renewable sources; activities related to the extraction of mineral resources; and waste treatment sites and facilities. The petitioners express concerns regarding the lack of sufficient assessment of the cumulative impact, limited public access to information, and insufficient consideration of local public interest; industrial pollution and water resource management; activities in protected areas and zones.

The Ombudsman promotes the right of access to information and public participation in administrative procedures on environmental matters

Compliance with requirements to ensure meaningful public participation in the process of spatial development

In practice, the citizens who do not qualify as interested parties within the meaning of Article 131 of the Spatial Development Act and whose projects are not subject to public consultation participate in the spatial development and investment design process at the discretion of the Regional Inspectorate of Environment and Water/Ministry of Environment and Water regarding the need to conduct environmental assessment or environmental impact assessment procedures for each case.

RES projects

The Ombudsman institution receives complaints and signals from citizens and citizens' committees regarding the construction of industrial photovoltaic power plants, energy storage facilities and wind farms near populated areas. The analysis of the complaints and signals received shows a consistent trend toward the concentration of large-scale investment projects on agricultural land and forest areas, with their designation being changed to zones for industrial activities. This process is taking place within a regulatory framework that primarily encourages investment initiatives but does not provide for sufficiently effective mechanisms to prevent excessive concentration of facilities in specific areas and to maintain a balance between different types of land use. There is no specific legislation to introduce an assessment of the social acceptability of such projects and mechanisms to mitigate the impacts on affected communities.

The provisions of Directive (EU) 2023/2413 on the identification and mapping of suitable areas for the accelerated development of renewable energy sources have been formally transposed into national law through amendments to the Renewable Energy Sources Act, but are not implemented. Conducting procedures under the general administrative procedure does not guarantee effective public

participation. Affected residents must be exceptionally proactive to exercise their rights, including by tracking individual administrative acts, which in practice limits the real possibility of timely objection.

Recommendations:

1. Create a public geographic information system (GIS), a single information hub containing: data on land whose designated use has been changed for the purposes of RES – generation, storage and power transmission infrastructure; decisions and certificates issued under the Agricultural Land Preservation Act and the Forestry Act; a breakdown of land use by type of permanent use and land category at the cadastral area and municipal levels; tracking of changes since the inception of RES projects.
2. Introduce a limit on the total percentage change in land use at the cadastral area and municipal levels (relative to the 2000 baseline), a minimum buffer zone set back from the building line; minimum distance between power plants; prohibition on converting forests, including naturally reforested agricultural land, for the construction of RES plants.
3. Update the established minimum distances from residential areas and other protected sites in line with the current technological developments and the increased capacity of the facilities.
4. Provide for financial mechanisms requiring the mandatory participation of the owner or licensed operator through the creation of a guarantee fund to cover: decommissioning; management of waste from panels and turbines; land reclamation within the statutory timeframes.
5. Grant powers to the EWRC to hear disputes regarding the management and operation of power plants at the request of residents of affected communities or representatives of the public.

Problems with overdevelopment

Throughout the year, numerous complaints and signals were received regarding intensive development in existing residential neighbourhoods, characterised by an increase in permitted building heights and a reduction in the distances between buildings; and the maximum utilisation of the total built-up area within a given territory.

The excessive development density leads to: overburdened transportation infrastructure; a shortage of parking spaces and public spaces; difficulties with water supply and sewerage systems; limited capacity to adapt to climate change; increased health risks associated with stress and noise pollution. These impacts affect the environmental factors in urbanised areas as defined by the Health Act and raise the question of the balance between investment interests and the right to a healthy and favourable environment.

Overdevelopment is also associated with the disregard of restrictions related to land stability standards or disaster risks, such as encroachment on ravines or river terraces (the tragic cases in the Elenite complex and other settlements along the Southern Black Sea coast) or geodynamic processes (the area north of Varna, Galata). In these cases, the citizens complaint against the approval of investment projects without an adequate environmental impact assessment based on up-to-date information and actual public consultation.

The specific examples include:

- Challenging decisions on high-density development in the Mladost district of Sofia, amid concerns over the lack of transparency and environmental impact assessments;
- A citizens' initiative to protect the Boyana Marsh as an ecosystem and a natural retention basin, calling for permanent protected status and a ban on construction;
- Complaints against construction in the Galata protected area near Varna, due to the risk posed to conservation objectives and the sustainability of the coastal terrain.

Recommendation:

The Ombudsman recommends a review of controversial decisions, *ex officio* amendments to development plans to establish permanent protected areas, halting construction activities where risks have been identified, and ensuring effective administrative control and meaningful public participation in decision-making processes concerning the environment.

The Ombudsman assists with defending citizens' rights regarding procedures under the Underground Resources Act

The Ombudsman institution assists citizens and organisations with procedures related to the exploration, study and extraction of mineral resources, the reclamation of disturbed land and the management of mining waste.

The main problems stem from the lack of adequate assessment of environmental and health risks, weak administrative control and limited public participation.

The specific examples include:

Regarding the permit for the exploration of metal minerals in the area of Svoге, Mezdra and Botevgrad, citizens and municipal councils expressed their strong opposition backed by a petition. An ambiguous position of the competent authority regarding the scope of the environmental assessment and the risk of water pollution was identified. The Ombudsman issued recommendations for the application of the prevention principle. The court admitted the complaint of an association as a legitimate party within the meaning of the Aarhus Convention and scheduled the case for hearing on the merits.

A long-standing systemic problem was also identified regarding the establishment of quarries and the extraction of construction materials in riverbeds and floodplains, in violation of the legal ban. The matter was referred to the competent authorities and the prosecutor's office. The Ombudsman supported the recommendation for an audit by the Court of Auditors regarding the management of concessions and the disposal of these public resources.

Reports of pollution and damage to municipal roads caused by quarry operations revealed a risk to road safety and a lack of adequate control. Following the Ombudsman's intervention, steps were taken to repair the road infrastructure and to impose specific obligations on the concessionaire.

There has been increased civic engagement in environmental impact assessment procedures, including through legal challenges to EIA decisions regarding quarries located near populated areas. The courts recognise the right of organisations to participate as interested members of the public. The Ombudsman recommends that the national reports on the state of the environment include information on significant court judgments in this area.

Recommendations

The Ombudsman's recommendations aim to ensure the prevention of environmental risks, the legality of procedures, and the effective participation of citizens in decision-making processes concerning natural resources and public health.

The Ombudsman advocates for the right to access clean and sufficient drinking water

The Ombudsman actively advocates for the citizens' right to access clean and sufficient drinking water in light of the ongoing water crisis in the Veliko Tarnovo region in 2025.

During an outreach reception room held on 3 October 2025, citizens expressed deep concerns about the frequent water outages and rationing, as well as the lack of transparency regarding planned investments to improve the WSS infrastructure. Particularly alarming were reports of a sharp drop in the water level of the Yovkovtsi Dam, posing a risk to drinking water supply, irrigation and livestock farming.

The water crisis was addressed at the parliamentary level through the establishment of an ad-hoc committee, the drafting of a report and a resolution by the National Assembly to take urgent measures, including the establishment of a National Water Board under the Council of Ministers.

In response to signals, the Ombudsman recommended providing complete and clear information regarding: the planned funding for the Yovkovtsi WSS under the Environment Program 2021–2027; and the progress of the regional feasibility studies for the development of the WSS infrastructure.

The Ombudsman has consistently advocated for sustainable water resource management to protect the citizens' fundamental right to access drinking water.

The Ombudsman assists for the citizens' rights to prevent and control harmful industrial emissions and improve air quality

The Ombudsman advocates for the citizens' right to a healthy environment by taking action to prevent and control harmful emissions from industrial sources and improve air quality.

Residents of Veliko Tarnovo have reported long-standing air pollution caused by dust, smoke and odours from a wood-processing plant operating under a comprehensive permit. Based on the complaints and a meeting held by the Ombudsman with representatives of the affected public during the outreach reception room, a lack of effective measures was identified and the competent authorities were notified accordingly. An interdepartmental working group was established to assess the health and environmental risks and conduct an epidemiological study on a possible link between the pollution and the health of the population. The report was made public. Following an emergency inspection in January 2026, the Regional Inspectorate of Environment and Water in Veliko Tarnovo shut down a production line due to non-compliance with the conditions of the comprehensive permit, as multiple violations and a sharp increase in public complaints had been identified in previous years.

In Pernik, residents have raised concerns about dust pollution from the sludge storage facility of a thermal power plant, as well as from damaged road surfaces and construction activities. The municipality is located in an area with confirmed excessive concentrations of fine particulate matter, which triggers an obligation to implement an emissions reduction program. The Ombudsman requested an inspection to verify the compliance with the measures, including the reclamation of the ash dump and the mitigation of secondary dust dispersion. The 2025 monitoring data show a higher-than-permissible number of days with excessive values of the average daily limit for PM10; hence, the municipality was issued mandatory directives by the Regional Inspectorate of Environment and Water.

Recommendations

The Ombudsman's recommendations call for strengthened institutional control, transparency in monitoring results, effective implementation of air quality programs and protection of the citizens' health from harmful industrial emissions.

X. RIGHT TO GOOD GOVERNANCE AND GOOD ADMINISTRATION

In 2025, the Ombudsman institution received 853 complaints and signals concerning the right to good governance and good administration, and completed the inspections of 696 case-files.

Table No. 10 *Number of complaints and signals and completed inspections related to the right to good governance and good administration for the period 2023–2025*

Year	Complaints registered	Inspections completed
2023	848	823
2024	756	799
2025	853	696

Another **8988** citizens submitted petitions to the Ombudsman.

The majority of the complaints completed in 2025 were filed against mayors of municipalities, districts and mayoralities, deputy mayors and their respective administrations – 416 (59.77%). The highest number of complaints was against Sofia Municipality (SM) and its districts, followed by those against the Municipality of Varna and the Municipality of Plovdiv.

There were 233 complaints (33.48%) against central executive bodies and their regional offices, and 37 complaints (5.32%) against individuals entrusted with the performance of public functions or the provision of public services. The most frequent complaints were against the Ministry of Interior (MoI), the Road Infrastructure Agency (RIA), the National Revenue Agency (NRA) and the Commission for Consumer Protection (CCP).

Of the completed cases, 367 found no violation on the part of the administration, 286 found a violation and 43 fell outside the Ombudsman's powers.

The main issues that citizens bring to the Ombudsman's attention are related to various aspects of administrative services.

Table No. 11 *Main problems raised in the complaints completed in 2025 in relation to the right to good governance and good administration*



ОМБУДСМАН
НА РЕПУБЛИКА БЪЛГАРИЯ

2025 ANNUAL ACTIVITY REPORT

Problems related to:	Number of completed complaints	Share of the completed complaints related to good governance
Non-fulfilments of obligations of administrations, including: - related to construction and maintenance of streets and roads and their technical infrastructure	229	32.90 %
Local self-governance	96	13.79 %
Violations of statutory requirements	151	21.70 %
Violation of administrative service quality standards, including: - reasonable time to consider and respond to issues raised	146	20.98 %
Access to public information	79	11.35 %
Impartiality and independence	38	5.46 %
Abuse of powers	23	3.30 %
Other	8	1.15 %
Complaints outside the Ombudsman's powers	5	0.72 %
Total	12	1.72 %
	696	100 %

Failure of administrations to fulfill their obligations

The largest share of complaints concerns the failure of administrative bodies to fulfill their obligations. As in 2024, the majority of these complaints relate to the lack of adequate and timely action to construct and maintain the condition of streets in populated areas, the national road network, and their associated technical infrastructure.

Numerous complaints call for:

- Improving traffic management, installing the necessary traffic signs and markings, constructing speed bumps to reduce speed; exercising systematic and effective enforcement of traffic regulations;
- Monitoring of heavy-duty vehicle traffic;
- Construction of parking lots and parking spaces;
- Construction of bike lanes;
- Maintenance and preservation of green spaces, removal of hazardous trees;
- Installation and maintenance of street lighting;
- Preventing flooding of properties;
- Securing hazardous shafts;
- Ensuring the safe use of swimming pools;
- Maintenance of cemeteries;
- Exercising the necessary control over commercial establishments;
- Forced removal of abandoned motor vehicles located on municipal property;
- Monitoring the performance of repair work.

Particularly pressing are the problems faced by residents of towns and villages where, following repairs to the water supply and/or sewerage networks, the restoration of the excavated streets has remained unfinished for years (Sofia, Varna, Ugarchin, the village of Smilets, Strelcha Municipality; the villages of Bata and Banya, Panagyurishte Municipality; and others). Some of these repairs are part of programs administered by the Ministry of Regional Development and Public Works (MRDPW), which fails to disburse the allocated funds in a timely manner.

There is also a large number of complaints regarding the failure of competent authorities to act on reports against tour operators concerning the refund of overpayments, the payment of compensation,

the provision of false or misleading information about the services offered and the cancellation of reservations.

There has been an increase in the number of complaints regarding the failure of the competent authorities to act on reports of unresolved product complaints, the failure to issue receipts and unreimbursed deposits from car rental companies.

As the country prepares to adopt the euro, there has been an increase in the number of complaints about the lack of adequate measures to address speculative price hikes for goods/services, as well as violations of the rules governing the labelling of goods and services in both lev and euro.

Recommendations:

1. Improve the organisation and management of activities related to the investment process and the subsequent maintenance of infrastructure.
2. Ensure transparency and public participation in setting priorities for the development of the urban environment and road infrastructure, as well as accountability in the use of financial resources.
3. Exercise effective control of contract compliance, including the quantity and quality of repair work performed and the deadlines for completing the repairs.
4. Take timely action and respond to complaints and signals from citizens within the legally prescribed timeframes.

Problems of local self-governance

There was a significant increase in the number of complaints resolved in 2025 regarding problems of local self-governance. In the vast majority of these cases, the citizens insist on:

- Changes in municipal ordinances, most often concerning parking regulations, including conditions for metered parking – coverage of zones, fee amounts, conditions for preferential paid parking, etc. (Sofia Municipality, the municipalities of Varna, Sozopol, Nesebar, Pomorie and Asenovgrad);
- Public disclosure of municipal council decisions in accordance with the 2024 amendments to the Local Self-Governance and Local Administration Act (LSGLAA);
- Naming streets and assigning numbers to administrative addresses;
- Clear rules and conditions for the use of municipal sports facilities (Varna, Sofia, Veliko Tarnovo).

There have been numerous complaints regarding the expansion of paid parking zones (the “blue” and “green” zones) and the increase in parking fees following the adoption by the Sofia City Council of amendments to the Ordinance on Traffic Organisation on the Territory of Sofia Municipality. The Ombudsman is of the opinion that the expansion of the “blue zone” and “green zone” for parking in Sofia and the increase in rates constitute a change that will have significant consequences for the citizens. This requires a broad public consultation, in accordance with Article 19, para 2 of the Ordinance on the Public Consultations on the Territory of Sofia Municipality, both by district and for the entire municipality, so that the citizens are given the greatest possible opportunity to express their opinions and views.

Based on the findings, the Ombudsman has reached the following conclusions:

- Failure to engage in dialogue with the citizens on an issue of such importance to the residents of the capital;
- Lack of factual and legal grounds to expand the paid parking zones and increase the parking fees;
- Breached fundamental principles and legal provisions in the drafting of the proposed Ordinance to Amend and Supplement the Ordinance on Traffic Organization on the Territory of Sofia Municipality.

In view of the above, the Ombudsman urged the Regional Governor of Sofia, the Chair of the Sofia City Council and the Mayor of Sofia to exercise the powers granted to them under the LSGLAA, specifically by remanding the decision of the Sofia City Council or proposing its withdrawal, and accordingly ensuring that its legality would be reviewed.

Another significant issue within the competence of local government authorities which citizens raise in their complaints to the ombudsman is the increase in local taxes and fees through amendments to the relevant municipal ordinances. This includes both the largest municipalities (Sofia, Varna and Plovdiv) and smaller municipalities (Dobrich, Gorna Oryahovitsa, Yambol, Tundzha, Balchik, Pomorie, Nesebar, Lukovit, Sapareva Banya).

The Ombudsman's position is that, as the country transitions to the euro, local councils should proceed with great caution when raising local taxes and fees. Local authorities often disregard the principles of transparency, open dialogue with the citizens and accountability, which breeds mistrust and discontent.

Recommendation:

Local government authorities should adhere to the principles of transparency and public participation in the process of discussing and making decisions on matters of local importance.

Violation of legal requirements by administrations

In 2025, there was a higher number of complaints regarding violations of legal requirements by administrative bodies. Most often, the complaints concern:

- Administration of local taxes and fees by municipal administrations;
- Registration of citizens by permanent and current address;
- Issuance of civil status records and certificates;
- Issuance of personal documents and renewal of driver's licenses;
- Fines imposed for violations of the Road Traffic Act (RTA) and the Roads Act (RA);
- Cancellation of vehicle registration;
- Annual vehicle inspection and determination of their emission class;
- Failure to meet the deadline for providing administrative services.

Issues affecting an unspecified group of people

Persons who have renounced their inheritance in accordance with the relevant legal procedures continue to appear on certificates of inheritance.

In response to complaints from citizens regarding violations of their rights resulting from their inclusion in a certificate of heirs of their deceased relatives despite having renounced their inheritance, the Ombudsman turned to the Minister of Regional Development and Public Works to discuss the need for regulatory changes governing the issuance of certificates of heirs in cases of renunciation of inheritance. In response, the Minister expressed the view that no regulatory changes were necessary and provided a detailed explanation of how a certificate was to be completed.

Issuance of electronic traffic violation notices to citizens for violations of the Road Traffic Act committed using motor vehicles belonging to their deceased relatives whose inheritance they have renounced in accordance with the proper procedure.

Although the relevant regional MoI office has been notified of the renunciation of inheritance, the violation notices continue to appear as active in the MoI information system, with no information regarding the outcome of the objection. Furthermore, despite this, these individuals continue to receive new violation notices for offenses they did not commit.

In a letter to the Minister of Interior regarding a specific case, the Ombudsman recommended that the MoI take into account the fact that the inheritance had been renounced, that the relevant forms be voided, and that the renunciation of inheritance be recorded in the information system of Traffic Police to prevent similar cases.

Penalties for drivers with tinted windows

In 2024, a citizen contacted the Ombudsman regarding a notice issued by the Varna MoI Regional Directorate because the front windshield and side windows of the vehicle they were driving were covered with dark-tinted film. An inspection into the complaint uncovered that the officers conducting vehicle inspections had not been equipped with a technical device to measure the light transmittance of vehicle windows.

In view of the above, in March 2025, the Ombudsman issued a recommendation to the Minister of Interior to take the necessary steps to ensure compliance with the procedure set forth in Article 105,

para 3 of the Road Traffic Act when conducting inspections of vehicles for tinted windows, so that in the future, the rights of drivers would not be violated in such cases. As a result, the Minister of Interior provided assurance that measures had been taken to provide mobile technical equipment for testing the light transmittance of vehicle windows for the needs of the MoI regional directorates. Nevertheless, in November 2025, a similar complaint was filed against a traffic violation notice issued by the Sliven MoI Regional Directorate.

Recommendation:

Adhere strictly to the principles of legality, objectivity and impartiality in the activities of the administration.

Violation of administrative service quality standards

These complaints are most often related to:

- Lack of feedback when submitting applications, signals and complaints;
- Non-observance of ethical standards and rude, unprofessional attitude of employees;
- Failure to observe the working hours;
- Difficulties to find the necessary information on administration websites, including contact information;
- Difficulties in contacting administrations via the telephone numbers provided;
- Requiring documents to be obtained through *ex officio* procedures;
- Excessive delays in responding to citizens on matters they raise;
- Lack of interaction and exchange of information between administrations, etc.

Recommendation:

1. Ensure strict compliance with the standards laid down in the Code of Conduct for Public Administration Staff.

2. Improve the administrative services, including taking timely and adequate management decisions and providing prompt information about them to the citizens. In the event of delay, the citizens should be informed about the reasons.

Problems arising from the regulatory framework

Addresses of citizens are listed as the registered office and/or business address of commercial companies and sole traders without their knowledge or consent.

The Ombudsman has raised this issue for years, both with the Ministry of Justice (MoJ) and in the activity reports to the National Assembly (NA).

The registered office and business address, along with the company name, are key identifying features of a company. They serve as the basis for communication with the company. The registered office plays an important role in determining local jurisdiction and is significant for the fulfilment of various obligations.

However, the lawmaker does not impose specific requirements regarding the registered office and business address of companies; for example, there is no requirement to submit a notarised deed of ownership or a lease agreement to prove a connection to a specific property. This allows for the designation and subsequent entry in the Commercial Register of any arbitrarily chosen address, even one that does not exist.

The provision of Article 29 of the Commercial Register and Register of Non-Profit Legal Entities Act (CRRNPLEA) allows any person with a legal interest, as well as a prosecutor, to file a claim to establish the nullity or inadmissibility of the entry, as well as the non-existence of a registered circumstance.

However, this possibility does not solve the problem. First, because it creates difficulties for the affected citizens. Through no fault of their own, they are forced to turn to the courts to resolve the issue, wasting time and money and expending additional effort. Furthermore, it is difficult, if not impossible, to send correspondence or summonses to companies at addresses that are not actually used by them.

Even if the court grants the claim under Article 29 of the CRRNPLEA, the address in question could once again be used as the registered office of a company without the owner's knowledge, and the owner could find themselves caught in this vicious cycle once again.

Recommendation:

Introduce changes in the regulatory framework regarding the registered office and address of a business, including a requirement to prove the right to use a given property for that purpose, as well as the establishment of a mechanism for their *ex officio* removal upon submission of a substantiated request to that effect.

The return of original documents issued abroad in the process of reissuing civil status records

The Ombudsman has received complaints from citizens that when they request the reissuance of civil status documents issued abroad, municipal administrations retain the original documents and later refuse to return them.

In response to these reports, the Ombudsman turned to the Minister of Regional Development and Public Works with a recommendation to discuss the need for an amendment to Ordinance No. RD-02-20-9/21 May 2012 on the operation of the unified civil registration system, explicitly providing for the mandatory return of the original document. In response, the Ombudsman was informed that all municipal administrations had been instructed to specifically notify citizens, when issuing such documents, that they may receive their original documents back.

Recommendation:

The public administration should apply the principles of good governance in its work, meeting the reasonable expectations of citizens and respecting their rights and the broader public interest.

XI. PROTECTION AGAINST DISCRIMINATION, HATE SPEECH AND EQUALITY BETWEEN MEN AND WOMEN

The Ombudsman reports an upward trend in complaints: from 17 in 2022 to 99 in 2025. As in its previous reports, the Ombudsman institution has repeatedly emphasised the adverse impact of discrimination on the lives of victims and the difficulties they are forced to face.

Although the institution is not a specialised anti-discrimination body, the complaints received reflect the citizens' trust and serve as recognition of the efforts to support and protect their rights:

- **Labour market:** Here, discrimination is defined as a “serious form of violation” because it deprives citizens of their means of livelihood. An example is a teacher of Arab descent who was fired, as well as widespread refusals to hire people with expert decisions from TEMC.
- **Digital exclusion:** The Ombudsman has criticised large retail chains for offering special prices that are only accessible via smartphones. This affects the elderly people who lack the skills or income to afford such devices.
- **Accessibility:** There were 24 complaints about inaccessible architectural environments (e.g., the Dolphinarium in Varna) and issues with parking spaces for people with disabilities in the municipalities.
- **Repressed persons:** Support is given to legislative changes to recognise the work experience of individuals who were detained in camps during the Revival Process to ensure social justice.

Hate speech and media environment

This is the most widespread violation in 2025 and it is clearly distinct from the constitutional right to freedom of expression.

- **Traditional media:**

- **Bulgarian National Radio:** A program was taken off the air following a complaint about the stigmatisation of ethnic communities.
- **bTV:** A documentary film about the conflict in Nagorno-Karabakh was criticised for the lack of objectivity and for trivialising the suffering of the Armenian people.
- **Political speech:** Statements by the Vazrazhdane [Revival] party targeting the Ukrainian community (“criminal network”, “Nazi groups”) were cited, which undermined the dignity of refugees.
- **Social media (TikTok, YouTube, Facebook):** There is a dangerous trend of videos promoting **sexism and violence against women**, portraying them as “subordinate.” The Ombudsman called for intervention by the Directorate General for Combating Organised Crime (DGCOC) and the Prosecutor’s Office.

Problems of the Roma community

“Persistent stereotyping” and a lack of progress on the National Strategy for the Roma have been identified.

- **Main barriers:** Institutional discrimination, early marriages, low literacy rates and social isolation which makes their marginalisation “socially acceptable”.
- **Recommendation:** The strategy should be considered by the National Assembly as a political signal of its priority.

Main recommendations:

1. Ensure equal access to rights and services for all citizens, regardless of their gender, background or beliefs.
2. Combat effectively hate speech as a prerequisite for violence and social exclusion.
3. Promote policies that eliminate structural inequalities between men and women in the public and private spheres.
4. The responsible authorities need to prioritise the effective implementation of existing legislation to combat anti-Roma attitudes and discrimination by strengthening the institutional culture and expert capacity of public institutions, building trust in their work, with a focus on human rights and the judiciary, and raising awareness among representatives of Roma communities about their rights and the mechanisms for their protection.

Additional specific recommendations:

5. Ensure equitable support for children with disabilities and special educational needs through regulatory changes and the effective implementation of inclusive education.
6. Create an accessible environment for people with reduced mobility.
7. Ensure greater awareness and effective countermeasures against hate speech by the relevant institutions, including raising public awareness.
8. To large retail chains: The terms and conditions for accessing services at discounted prices (via mobile apps) should be as simple and flexible as possible so that elderly people without smartphones can also take advantage of them.
9. To the institutions responsible for discrimination in the labour market: Pay particular attention to these instances as they lead to social marginalisation and poverty. It is necessary to develop practical and effective measures to ensure employment for people with disabilities.
10. To municipal councils: Review the regulations regarding parking for people with disabilities to ensure that time limits do not impose additional financial burdens.
11. To the relevant authorities (DGCOC, the Prosecutor’s Office, the Commission for Protection against Discrimination, NRA): Take measures to investigate and remove videos from social media that promote sexism, incite violence against women and contain hate speech.
12. To the National Assembly: The strategy on Roma issues should be brought to its attention as an important political signal regarding the integration process.

XII. RIGHT OF DEFENCE IN ENFORCEMENT PROCEEDINGS

In comparative terms, the rate at which complaints regarding violations of rights in enforcement proceedings have been filed with the Ombudsman shows the following trends :

Year	Number of complaints	Trend
2023	341	Reference value / High level
2024	214	A significant decline (a decrease of approximately 37%)
2025	326	A sharp rise and a return to 2023 levels

The complaints filed concern the actions of enforcement agents, both private and state-employed.

There is a V-shaped in the number of complaints – following a noticeable improvement in 2024, public frustration began to rise again in 2025.

Main issues:

- ✓ **Lack of prior notification regarding the freezing of bank accounts and proper notification of enforcement proceedings.**
- ✓ **Technical limitations of banking systems when placing a freeze on a bank account, which restricts the ability to withdraw funds from an ATM.**
- ✓ **Difficulty accessing funds because, when a bank account is frozen, withdrawals of non-seizable funds are only possible at a bank teller window during bank business hours.**
- ✓ **Financial burden – Cash withdrawals at the teller counter incur higher bank fees than ATM withdrawals and account maintenance fees also increase when an account is frozen.**

Due to the issues identified, the Ombudsman institution sent a recommendation to the Chair of the Management Board of the Association of Banks in Bulgaria.

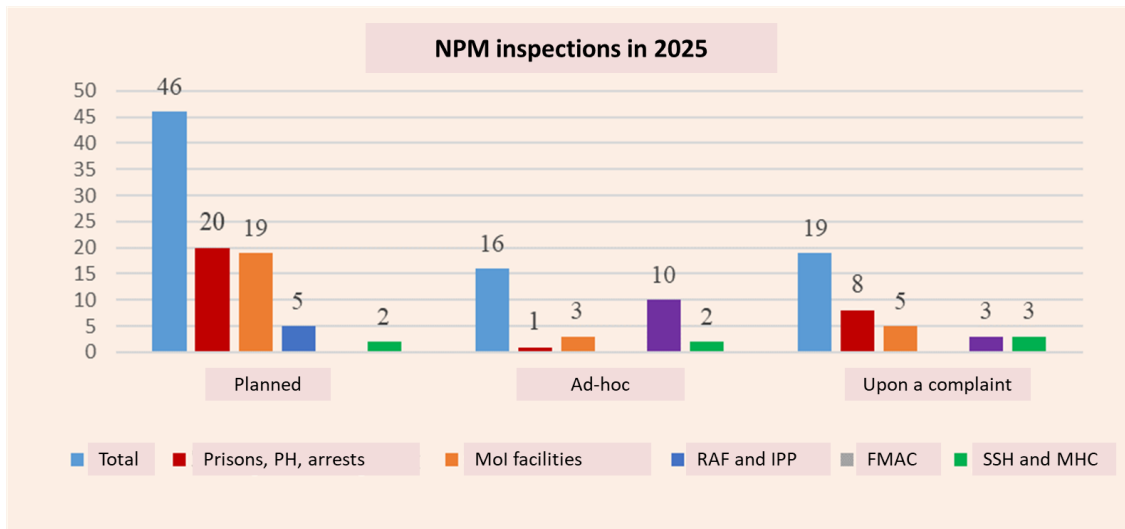
Recommendations:

1. Discuss the technical feasibility of allowing citizens with frozen accounts to withdraw their non-seizable funds from ATMs.
2. Establish a condition for withdrawals, proposing that this be permitted only if the withdrawal is made within the month in which the funds were deposited into the account.

XIII. NATIONAL PREVENTIVE MECHANISM

In 2025, the Ombudsman, acting as the National Preventive Mechanism, conducted a total of 81 inspections in places of deprivation of liberty, state psychiatric hospitals and mental health centres, detention centres for refugees and migrants, police detention facilities, and family-type accommodation centres for children and adults, representing a 35% increase compared to the inspections carried out in the previous year, 2024.

Figure No. 14. *Number of NPM inspections in 2025 by category of body inspected*



Protection of children in institutional care

For yet another year, protecting the rights of children in institutional care remains one of the NPM's top priorities. The inspections of specialised institutions for children in 2025 confirmed **long-standing systemic shortcomings** in state policy regarding children in conflict with the law and children at risk.

Despite the reported partial positive progress, **an institutional and essentially punitive approach toward children continues to be observed** based on an outdated legal framework, with limited access to timely psychological, psychiatric and social support, insufficient inter-institutional coordination and a lack of adequate social services aimed at reintegrating children into the community.

Protection of children in reform boarding schools

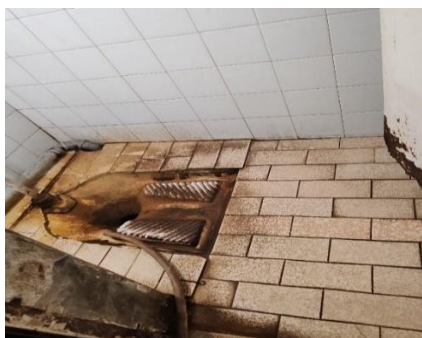
In 2025, the Ombudsman found that **children, including those under the age of 14, continued to be placed in reform boarding schools** in conditions that did not provide effective support for their development and created a risk of secondary victimisation. The Combating Juvenile Anti-Social Behaviour Act continues to be applied even though it is morally and conceptually outdated and contradicts international standards, despite the state documents on juvenile justice reform adopted as early as 2011 and the insistent recommendations for the adoption of a Diversion from Criminal Proceedings and Imposition of Educational Measures on Minors Act. **The 2025 visit to the Varnentsi SEBS confirmed that, despite the Ombudsman's repeated recommendations to close these institutions, the practice of placing children in boarding houses continues, including children with status violations (running away, theft, etc.), which indicates a systemic inability of community-based services to adequately meet their needs.**

The facilities at the reform boarding schools remain dilapidated, the quality of education is poor, the access to specialised medical and mental health care is limited and the remote location of the institutions further hinders communication with families and subsequent reintegration.

Children who have not become of age **need to be treated as victims of their circumstances**, rather than being victimised by the society and the State through the imposition of further restrictions on their rights.

Protection of children placed in temporary placement facilities for minors under the MoI

In 2025, the NPM monitoring covered all temporary placement facilities for minors under the MoI. Practices **incompatible with the best interests of the child** were identified. For years, the Ombudsman has recommended that child offenders and child victims not be placed in the same facility.



Sanitary unit for the children in the Plovdiv TPFM

Recommendations:

- Improve the living conditions for children at the temporary placement facilities for minors under the MoI;
- Amend urgently the Regulations on the Organisation and Operation of Temporary Placement Facilities for Minors and bring them in line with the international standards;
- Amend and supplement the Instructions on the Escort of Minors by MoI Bodies;
- The Directorate General National Police needs to prepare methodological guidelines;
- Conduct mandatory training for all employees;
- Fill the necessary staff positions;
- Carry out a comprehensive renovation of the building stock;
- The Central Commission for Combating Juvenile Anti-Social Behaviour needs to conduct inspections.

Unaccompanied children seeking protection

Another key priority in the work of the National Preventive Mechanism remains the protection of the rights of unaccompanied children seeking protection in the Republic of Bulgaria. Compared to previous years, 2025 saw a significant decrease in the number of such children, which is attributed to Bulgaria's accession to the Schengen Area, the redeployment of additional Border Police personnel to the land border with the Republic of Turkey and enhanced border controls.

Despite the progress reported regarding the regular implementation of routine repairs and improvements, problems persist regarding hygiene and sanitation conditions, the presence of pests in the premises and access to specialised health care. Still valid is the recommendation regarding the need to introduce a systematic policy for the protection and integration of unaccompanied children, including their **removal from refugee centres after being granted refugee or humanitarian status and their placement in appropriate social services**. The social services for unaccompanied children remain highly insufficient and the number of professionals working with them remains limited.

Social services for adults – illegal practices and legislative changes

The social services for the elderly remained a key focus of the Ombudsman's work as the National Preventive Mechanism in 2025. Over the past year, following numerous inspections that uncovered cases of illegal provision of social services, the Ombudsman sent another opinion to the Speaker of the National Assembly of the Republic of Bulgaria, the Prosecutor General, the Minister of Justice and the Minister of Labour and Social Policy. Among other measures, it recommended amendments to Criminal Code to criminalise the illegal provision of social services.

The Ombudsman's commitment to this issue has been consistent and long-standing. As early as 2022, as part of the monitoring carried out under the National Preventive Mechanism², serious violations were identified regarding the **unlawful provision of social services for people with disabilities, including those with dementia and mental disorders, by unlicensed providers**. The findings revealed serious risks to the health, dignity and lives of the residents.

² [Report on the inspections of the Ombudsman acting as the NPM at homes for adults with mental disabilities, 2022](#)

In the absence of effective legislation allowing for the sanctioning and termination of such practices, the Ombudsman consistently advocated for legislative changes in the years that followed. In this context, it was repeatedly emphasised that the illegal provision of social services and the treatment of the people placed in such facilities in a cruel, inhuman or degrading manner constituted torture within the meaning of the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, as well as the European Convention for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment of the Council of Europe.

At the end of 2025, the National Assembly had acted on the recommendations and adopted the necessary amendments to the Criminal Code, which criminalised the illegal provision of social services.

Inspections at places for the deprivation of liberty

In 2025, the Ombudsman, acting as the National Preventive Mechanism, conducted numerous inspections of prisons, prison hostels, police detention facilities and the Specialised Hospital for Active Treatment of Persons Deprived of Liberty in Sofia. The findings of the monitoring indicate that **the main systemic problems identified during the visit of the Committee for the Prevention of Torture (CPT) in 2021, as well as in earlier periods, continue to exist at present.**

The living conditions in a significant number of detention facilities remain unsatisfactory. The findings include dilapidated buildings, insufficient living space, limited access to natural light and ventilation, moisture and mould, as well as the poor condition of the sanitary facilities. The problem of cockroaches and bedbugs, as well as outdated bedding, remains a concern. The Kremikovtsi closed-type prison hostel remains in a particularly poor condition, despite repeated recommendations that it be closed down.

A serious systemic deficit is also evident in medical care caused by a shortage of doctors, psychiatrists and dentists, which results in **delayed or limited access to treatment.** At the Specialised Hospital for Active Treatment of Persons Deprived of Liberty in Sofia, the staffing crisis continues, as does the practice of inmates purchasing medications with their own funds.

As a result of the inspections, including a review of medical records and interviews with persons deprived of liberty, a **growing problem with substance use was identified, including the spread of a new substance known as “the herb”.** There is no official information on the number of drug-dependent prisoners, as new narcotic substances constant emerge that are difficult to identify using existing tests. **An increase in conflicts and reports of violence among inmates was also noted.**

In connection with the use of narcotic substances and their unclear composition, a recommendation was made to amend Ordinance No. 2 of 22 March 2010 on the Conditions and Procedures for Medical Care in Places for Deprivation of Liberty. The proposal provides for the creation of a mechanism enabling medical professionals in such facilities to collect blood samples for analysis to detect the presence of narcotic substances, their precursors and other chemical substances used as narcotics.

Police violence

For yet another year, the Ombudsman, in its capacity as the National Preventive Mechanism, took *ex officio* action in a number of cases involving allegations of police violence. The reports primarily concern cases of **excessive use of physical force, unlawful use of restraints by police officers, as well as other offenses committed during the detention of citizens.** In some of the cases inspected, **disciplinary violations and unlawful actions by officers were confirmed, leading to the initiation of pre-trial proceedings and the imposition of disciplinary sanctions.**

Particularly alarming are reports of grave bodily injury and deaths following police custody, which raise serious questions regarding the observance of the detention standards, as well as the principles of legality, necessity and proportionality in the use of force. In some cases, the forensic medical examinations did not establish a direct causal link between the actions of police officers and the fatal outcome. Nevertheless, the significant public outcry over these cases underscores the **need for full transparency, timely public information and an effective institutional response.**

The accumulation of such cases throughout the year highlights a persistent problem and confirms the need to implement systematic preventive measures, ensure effective and independent control, and provide **enhanced training for Ministry of Interior staff in the areas of de-escalation**

and the protection of human rights. In this context, the Ombudsman consistently calls for the improvement of internal accountability mechanisms and for ensuring effective, independent and timely investigations into every report of police violence.

Asylum seekers and their rights

The respect for the rights of people under temporary protection remains a priority for the Ombudsman. The legal framework governing the registration card for persons under temporary protection poses a serious problem. Pursuant to Article 40, para 3 of the Asylum and Refugees Act, this document **is not equivalent to an identity document**, which hinders the individuals' access to a range of services and violates their fundamental rights. In contrast, persons with refugee or humanitarian status receive documents recognised as identity documents under Article 14 of the Bulgarian Identity Documents Act. As a result, **the people under temporary protection face restrictions, including in their access to employment and vocational training.** The Ombudsman has seen numerous refusals by institutions such as the Automobile Administration Executive Agency which refuses to allow Ukrainian citizens to take driving tests due to the lack of a valid identity document.

This issue remained unresolved in 2025, despite the repeated warnings and recommendations from the Ombudsman and the non-governmental sector. The main challenge is **to transpose the European regulations without creating conflicts with the national legal system and the mandates of individual institutions.** The key legal issues that need to be resolved and which the Ombudsman will monitor closely include:

- Clear distinction of the functions of administrative bodies, legal aid and control institutions;
- Safeguarding the rights of vulnerable groups, including unaccompanied children;
- Prohibiting the assignment of duties that are incompatible with the Ombudsman's mandate;
- Setting clear and practical rules for the transition from temporary to international protection.

Mental health

The rights of people with mental disorders remain a key focus of the Ombudsman's work as the National Preventive Mechanism. In 2025, inspections were conducted at three state psychiatric hospitals, two mental health centres and one psychiatric clinic affiliated with a university hospital.

The monitoring revealed some progress in the reform aimed at improving the quality of care in state psychiatric hospitals. Of the total of eleven state psychiatric hospitals, four have been completely renovated and one is scheduled to be relocated to a new building in Sofia. The Ministry of Health informed the Ombudsman that renovation of the State Psychiatric Hospital in Lovech was also planned. During the reporting period, **the first forensic psychiatric ward for women in Bulgaria was opened, as well as the first inpatient facility for the treatment of children with mental illnesses, both offering very good material and living conditions.** Over the past two years, seven residents have also been appointed to state psychiatric hospitals to pursue a specialty in "Psychiatry."

The inspections conducted in 2025 did not reveal any serious violations in the application of temporary physical restraint measures – isolation and immobilisation – in state psychiatric hospitals. Some of the medical facilities have also launched staff training programs related to the application of these measures.

Despite the reported improvements, serious problems persist in state psychiatric hospitals. These include **poor living conditions in unrepaired facilities, a lack of sufficient staffing and a sustainable policy to address this issue, the absence of social services supporting the reintegration of people with mental disorders into the community, the lack of occupational therapy, as well as the failure to ensure the right to individualised care.**

The most important conclusion of the Ombudsman as the National Preventive Mechanism and a main focus of his work in 2025 is **the need to amend the legal framework governing mental health**, including the provisions of Chapter Five of the Health Act and Ordinance No. 1 of 28 June 2005 on the Procedure for Applying Measures of Temporary Physical Restraint to Patients with Diagnosed Mental Disorders. **The shortage of staff remains a serious problem** – psychologists, social workers, occupational therapists and nurses. In this regard, the Ombudsman sent an opinion to the National Assembly regarding a proposed Bill to Amend and Supplement the Health Act, Chapter Five Mental Health.

XIV. AUDIT OF WHISTLEBLOWING AND WHISTLEBLOWER PROTECTION ACTIVITIES

Pursuant to § 5 of the Whistleblower Protection Act and Article 19, para 1, item 14 of the Ombudsman Act, the Ombudsman conducts an independent external audit of the Personal Data Protection Commission (PDPC) as a central external channel and reviews complaints from whistleblowers regarding the lack of protection and breaches of confidentiality. Three years after the law came into force, the audit practice and complaints indicate that the main problems lie in the **practical application** and the **effectiveness** of protection, and not merely in the regulatory framework.

In 2025, 9 complaints were filed, primarily regarding **insufficient and/or ineffective protection**, difficulties in navigating the system and ongoing uncertainty about who qualifies as a “whistleblower” and when protection applies. For example, in a case of delayed referral of a report (in violation of the 7-day deadline), the individual was dismissed; however, with the assistance of the Ombudsman institution and the imposition of interim judicial measures under Article 34a of the Whistleblower Protection Act, the order was suspended and revoked due to a causal link with the report.

A key systemic issue is the **lack of a mechanism to ensure continued protection** after the proceedings before the PDPC have been concluded. In a specific case, the PDPC holds that it cannot monitor compliance and that sanctions under Article 43 can be imposed only after a court ruling, a view that the Ombudsman does not share, citing the *prima facie* **assessment and the reversed burden of proof** provided for in the Directive and Article 40, para 2 of the Whistleblower Protection Act, as well as the independent administrative sanctioning authority of the PDPC.

The audit found progress in the form of earlier provision of protection and more limited disclosure of identity; however, protection continues to function merely **in form**: it amounts to a letter/certificate of protection, without an assessment of the risk of retaliation, without follow-up, without actual interaction with the competent authorities (CA) regarding the law, and without the implementation of corrective measures (in practice, **such have not been implemented even once since the law came into force**). Additional issues have been identified: conflicts in deadlines with the special laws regarding the CA; ambiguities regarding the corrective measures (the type of act by which they are imposed, the procedure and manner of their implementation, as well as their traceability by the PDPC); partial use of Article 20, para 4 of the Whistleblower Protection Act to issue instructions to the CA; lack of capacity and high turnover within the External Whistleblowing Channel Directorate (EWCD); risks in the registry and statistics; a narrow and inconsistent interpretation of “*work context*” and “*public interest*” which, sometimes, removes reports from the scope of the Whistleblower Protection Act and leads to disclosure of identity and lack of protection.

Recommendations have been made for legislative changes (including the drafting and adoption of implementing regulations for the Whistleblower Protection Act, with the aim of: clarifying the interaction with the CA, corrective measures, legal aid, and to specify in detail the scope and content of the authority of the EWCD under Article 20, para 4 of the Whistleblower Protection Act), and specific recommendations have been made to the EWCD (regarding mechanisms for monitoring protection, developing a methodology for the risk of retaliation, training, transparency of rules, more comprehensive exercise of powers, and much more).

THE CONCLUSION OF THE AUDIT is that, in its current form, the protection mechanism does not provide the real, timely and effective protection for whistleblowers envisaged by the Whistleblower Protection Act and Directive (EC) 2019/1937, as intended by the Whistleblower Protection Act, namely to ensure that reporting a violation of public interest will not result in adverse consequences for the person who reported it.

Recommendations:

RECOMMENDATIONS TO THE LEGISLATURE, THROUGH THE SPEAKER OF THE NATIONAL ASSEMBLY OF THE REPUBLIC OF BULGARIA, AS WELL AS TO THE EXECUTIVE THROUGH THE PRIME MINISTER OF THE REPUBLIC OF BULGARIA AND THE MINISTER OF JUSTICE

In light of these findings, the audit team considers the following to be necessary:

1. Clarify to what extent the Whistleblower Protection Act is a special one with regard to the procedural rules and deadlines that the CA must adhere to during the investigation of reports.
2. Clarify the list of CAs under Article 20, para 1 of the Whistleblower Protection Act, including:
 - Conduct a legislative review of the role of the Commission for Protection of Competition;
 - The Financial Inspection Agency should be added to the list, given its oversight powers in the area of public procurement.
3. Clarify the provision of Article 33 of the Whistleblower Protection Act regarding the corrective measures with respect to the legal grounds, the type of act and the procedural rules for their application, in order to prevent the protection regime from becoming effectively unenforceable.
4. Repeal of Article 19, para 3 of the Whistleblower Protection Act as contrary to Article 3, para 1, littera k of the Whistleblower Protection Act **or** clarify how the PDPC ensures protection regarding reports of violations of “*the protection of privacy and personal data*” in accordance with the minimum requirements of the Whistleblower Protection Act, which are examined by the PDPC under the general procedure.
5. Amend the text of Article 22 of the Legal Aid Act to include a new category of persons in line with the practice in other EU Member States.
6. Clarify the scope and content of the authority of the PDPC under Article 20, para 4 of the Whistleblower Protection Act “*to issue instructions on how the inspection is to be conducted*”, which should be explicitly defined and delineated as a procedural and coordination mechanism.
7. Align the wording of the Whistleblower Protection Act to that of the Directive regarding the phrase “against” an affected person, specifying that the report is “against” a violation, not against a specific affected individual.

In light of these findings, the audit team considers it particularly important and recommends that legislative changes be initiated to draft implementing regulations for the Whistleblower Protection Act in its entirety, including:

- Interaction between CA and EWCD;
- Corrective measures in response to actions taken under Article 33 of the Whistleblower Protection Act;
- Support measures for whistleblowers;
- Protective measures for whistleblowers;
- Independent checks under Article 24 of the Whistleblower Protection Act;
- Provide in detail for the scope and content of the powers of the PDPC under Article 20, para 4 of the Whistleblower Protection Act.



CHAPTER TWO: IMPACT ON THE LEGAL FRAMEWORK

I. REQUESTS TO THE CONSTITUTIONAL COURT AND THE SUPREME COURTS IN 2025

- **Request to the Constitutional Court to declare Article 147, para 9a of the Road Traffic Act (RTA) unconstitutional**

Pursuant to Article 150, para 4 of the Constitution of the Republic of Bulgaria, in 2025 the Ombudsman of the Republic of Bulgaria turned to the Constitutional Court with a request for a ruling that Article 147, para 9a of the Road Traffic Act was unconstitutional as it conflicted with Article 4, para 1, Article 16 and Article 48, para 1, Article 17, paras 1 and 3, and Article 35, para 1 of the Constitution of the Republic of Bulgaria.

The provision of Article 147, para 9a of the RTA was adopted by virtue of § 45, item 3 of the Act to Amend and Supplement the Road Traffic Act (published in the State Gazette No. 64 of 5 August 2025; AASRTA). It provides that an inspection of the technical fitness of a motor vehicle shall be performed only after it has been established that there are no outstanding obligations to pay a fine or a financial penalty on the part of the owner or user, as well as on the part of the person presenting the vehicle for the inspection as of the date of the inspection.

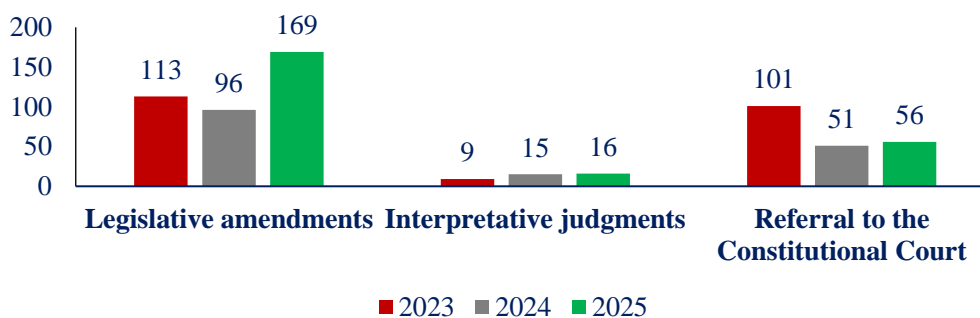
According to the Ombudsman, the contested provision of Article 147, para 9a of the RTA, which requires not only that the vehicle owner have paid all traffic violation fines, but also that the user listed in the registration certificate and the person presenting the vehicle for an inspection have done so, directly and unjustifiably infringes upon fundamental constitutional rights of the citizens – the principle of the rule of law (Article 4 of the Constitution), the right to work (Article 16 and Article 48 of the Constitution), the right to property (Article 17 of the Constitution), the right to freedom of movement (Article 35 of the Constitution). The text hinders the exercise of these rights by circumventing the procedure for the collection of public receivables and creates an administrative obstacle that is not related to security.

Constitutional case No. 15/2025 was initiated based on the request. By a ruling of the Constitutional Court dated 20 November 2025, the request was admitted for review on the merits with respect to § 45, item 3 of the Act to Amend and Supplement the Road Traffic Act (published in the State Gazette No. 64 of 5 August 2025; AASRTA), which adopted the contested provision of Article 147, para 9a of the RTA, effective as of 9 months after the promulgation of the law.

By Judgment No. 3 of 19 February 2026, the Constitutional Court declared unconstitutional the provision of § 45, item 3 of the Act to Amend and Supplement the Road Traffic Act (published in the State Gazette No. 64 of 2025), finding that the provision of Article 147, para 9a of the RTA challenged by the Ombudsman is inconsistent with Article 16, Article 17, paras 1 and 3, and Article 48, para 1 of the Constitution of the Republic of Bulgaria.

II. LEGISLATIVE PROPOSALS

Figure No. 15 *Number of complaints, proposals and signals related to legislative amendments*



The statistics show a significant increase in the number of complaints, proposals and signals related to changes in the legislation in 2025 compared to 2024, which could be explained by the election



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of a new Ombudsman around the middle of the year. The number of requests to refer cases to the supreme courts for interpretative judgments remains relatively low, while the reports of unconstitutional legislation are nearly equal to those submitted in 2024.

There has been a growing number of complaints in which people inquire about how they can take advantage of the newly enacted Insolvency of Natural Persons Act, or the so-called personal bankruptcy, or the statute of limitations provided for in the Obligations and Contracts Act. Deteriorating health and financial conditions, coupled with the large amount of debt incurred, lead to despair and helplessness due to the inability to repay debts and start over with a clean slate. In this regard, it is important to note that the State Gazette No. 18 of 17 February 2026, promulgated Decree of the Council of Ministers No. 32 of 12 February 2026, amending and supplementing the Tariff of State Fees Collected by the Courts under the Civil Procedure Code, setting the fee for filing a request to initiate insolvency proceedings and to establish the conditions for the discharge of obligations under the Insolvency of Natural Persons Act, as well as for the performance of the actions and acts provided for in the Insolvency of Natural Persons Act by state enforcement agents.

A significant portion of the complaints come from people with gambling addictions and their relatives, who typically bear the brunt of the severe consequences of this addiction. In addition to inquiries regarding the enforcement of regulations, the citizens also submit proposals for amendments to the Gambling Act, primarily concerning the registration and deregistration of vulnerable individuals with the NRA and measures to prevent registered individuals from accessing gambling games. Since a link is often found between gambling-addicted individuals and their descent into the spiral of fast loans, a proposal is made to create a registry similar to that of vulnerable individuals, but specifically for people who have developed an addiction to taking out fast loans.

In 2025, the Ombudsman institution reached out to the Members of Parliament and the Minister of Justice to express support for proposed amendments to the Criminal Code aimed at effectively protecting animals from violence, prompted by serious public outrage and reaction to the brutality and sadism of perpetrators of crimes against animals. It was emphasised that the institution stood in solidarity with the aforementioned need for adequate criminal law protection of the social relations, within the framework of which the protection of animals from unlawful attacks and torture must be guaranteed. Of paramount importance are both the more effective and harsher penalties for crimes against animals and an immediate and decisive response to violence against them. The increased penalties should have a deterrent effect, and it is of the utmost importance to improve the legislation with regard to the prevention, investigation and timely detection of such criminal acts.

Fifty-six people requested that the Ombudsman refer matters to the Constitutional Court; it is important to note that the Ombudsman may only petition the Court to rule on the unconstitutionality of a law when fundamental rights and freedoms have been violated. For the most part, the complaints relate to requests for the Constitutional Court to rule as a court of last resort in various cases or regarding acts that fall outside the Ombudsman's competence.



**CHAPTER THREE:
MONITORING THE
IMPLEMENTATION OF
INTERNATIONAL
ACTS IN THE AREA
OF HUMAN RIGHTS**

I. OVERVIEW

The monitoring of the implementation of international legal acts in the area of human rights is carried out by the Ombudsman of the Republic of Bulgaria on the basis of the UN Paris Principles and the Ombudsman Act (OA). Pursuant to Article 19, para 1, item 10 of the OA, the Ombudsman has explicit powers to monitor and promote the effective implementation of human rights conventions to which the Republic of Bulgaria is a party.

Based on the continuous monitoring of how the State implements international human rights instruments, the Ombudsman prepares opinions and formulates recommendations. In addition, in fulfilment of the powers to promote and protect human rights, the Ombudsman includes in the Annual Report a separate section to assess both the extent to which national legislation has been aligned to the content of each convention and the practices of national institutions in implementing them.

For yet another year, the Ombudsman has found that Bulgaria lags behind in the process of acceding to international legal instruments that allow citizens to lodge complaints with supranational (conventional) bodies in cases of violations of their rights. **In 2025, Bulgaria again failed to take steps to accede to the Optional Protocol to the Convention on the Rights of Persons with Disabilities and to the Third Optional Protocol to the Convention on the Rights of the Child.**

In addition, Bulgaria has not yet ratified Protocol 16 to the ECHR which provides for a mechanism for cooperation between the national courts and the ECtHR similar to preliminary rulings to the ECJ. This mechanism will facilitate significantly the alignment of the Bulgarian case-law to that of the ECtHR and contribute to fewer convictions.

For yet another year, the Ombudsman reminds that, after the entry into force of Article 28, para 3 of the Statutory Instruments Act at the end of 2016, the National Mechanism for reviewing the compliance of statutory instruments with the ECHR is to be applied by both the executive and the legislative authorities. The practice of not checking bills proposed by Members of Parliament for compliance with the ECHR and the case law of the ECtHR may lead to violations of international human rights standards and new judgments against Bulgaria in Strasbourg. In this sense, it would be appropriate to consider legislative changes to envisage a preliminary assessment of the compliance of legislative proposals by Members of Parliament with the ECHR when they relate to fundamental rights and freedoms of citizens.

Unfortunately, the 50th and 51st National Assemblies did not continue the positive practice established in the 47th National Assembly of setting up a parliamentary subcommittee to monitor and analyse legislation in accordance with EU principles and standards and international standards for the protection of human rights and fundamental freedoms, and to analyse the legal consequences of Constitutional Court judgments.

II. EUROPEAN CONVENTION FOR THE PROTECTION OF HUMAN RIGHTS AND FUNDAMENTAL FREEDOMS

As in previous years, it can again be concluded that the individual enforcement measures provided for in the Court's judgments are being implemented and generally do not pose any problems. The process of paying compensation and informing the competent authorities of any need for additional individual measures (e.g., reopening of court proceedings, etc.), as well as the process of translating the judgments and disseminating them, is coordinated by the Legal Representation of the Republic of Bulgaria before the ECtHR Directorate (LRRBECtHRD) at the Ministry of Justice, with strict monitoring to ensure compliance with the relevant deadlines and that the judgments reach the widest possible range of competent authorities and individuals. In addition, all judgments are published on the website of the Ministry of Justice and on the portal: <http://humanrights.bg/>.

With regard to Bulgaria's progress in implementing the judgments under the supervision of the Committee of Ministers in 2025, the following main conclusions can be drawn:

First, the statistics show that as of 2025, the total number of ECtHR judgments in the enforcement phase is **167, of which 93 are leading judgments and 70 are repetitive judgments**. Given the data as of December 2024 – 171 judgments – it is clear that, at present, there has been no significant improvement in the country's policy regarding the enforcement of judgments.

Second, in 2025, 16 new convicting judgments were placed under monitoring by the Committee of Ministers – 8 leading ones and 17 repetitive ones³. Bulgaria's progress remains extremely unsatisfactory when compared to that of other countries in the region.

In 2024, the conclusions drawn in previous years remain valid, namely:

- A significant number of judgments has remained under enhanced monitoring for more than a decade;
- The trend continues that the convicting judgments still subject to enhanced monitoring concern, unfortunately, a large number of ECHR texts which requires a large number of complex measures to be taken; the number of leading judgments in which the general recommendations of the ECtHR have been implemented is still incomparably smaller than those in which no satisfactory progress has been made;
- Bulgaria continues to pay extremely high amounts in compensation for violations of rights. Although action has been taken to execute almost all of the convicting judgments in the years following their delivery, it is still insufficient to close the monitoring, despite the efforts of various institutions and working groups. As a result, the recommendations of the Committee of Ministers on the execution of such judgments remain largely unchanged.
- In 2025, Bulgaria was still in a situation where it continued to be convicted in similar cases and to pay high amounts in compensation while, at the same time, the citizens' rights continued to be ineffectively protected. This situation is unacceptable and decisive action should be taken to overcome it. As in previous years, the Ombudsman is committed to assisting and supporting the Minister of Justice by making recommendations to the responsible institutions to take specific action on the judgments against Bulgaria.

Main recommendations:

1. Strengthen the mechanisms of coordination among the various institutions responsible for the execution of the ECtHR judgments against Bulgaria. The lack of progress in this regard in 2025 proves once again that the State needs to take general preventive measures;
2. The Ombudsman's observations in 2022 again show that measures need to be taken to strengthen the role of the Ministry of Justice and of the LRRBECtHRD in coordinating the process of aligning the national legislation and institutional practice to the judgments of the ECtHR;
3. For this reason, the Ombudsman continues to insist on the need to establish an inter-departmental coordination council comprising representatives (experts) of all national institutions that need to be directly involved in the process of coordinating and monitoring the implementation of the measures to execute with the ECtHR convicting judgments.

New ECtHR judgments against Bulgaria in 2025⁴

In 2025, a total of 23 new judgments were delivered by the ECtHR in cases against Bulgaria.

In the largest number of cases, with 5 judgment issued, the ECtHR found a violation of **Article 6 of the ECHR – right to a fair trial** and of **Article 1 of Protocol No. 1 – right to property**.

Second in importance with 3 judgments issued come the cases concerning violations of **Article 13 of the ECHR – effective domestic remedy**.

Next are the ECtHR judgments finding violations of **Article 3 of the ECHR – inhuman or degrading treatment (2)**, **Article 8 of the ECHR – right to respect for private and family life (2)**, as well as violations of **Article 10 of the ECHR – freedom of expression (2)**.

The analysis shows that unresolved issues persist, leading to judgments against Bulgaria by the European Court of Human Rights.

³ Up-to-date data as of 31.12.2025, source: Country Factsheet, <https://www.coe.int/en/web/execution/bulgaria>

⁴ <https://www.echr.coe.int/documents/d/echr/stats-violation-2025-fra>

ECtHR judgments subject to enhanced monitoring of execution by the Committee of Ministers

- **Case group *Dimitrov and Others v. Bulgaria* (formerly *Velichkova v. Bulgaria*) – Violations of Articles 2 and 3 due to the ineffective investigation of complaints against the actions of the police or other public officials**

The cases in the group *Dimitrov and Others v. Bulgaria* concern deaths, torture (including the failure to adequately prosecute acts of torture), ill-treatment, or a lack of timely medical assistance during arrest, police custody, or in places of detention, and the lack of effective investigation into these cases (violations of Articles 2 and 3). Bulgaria systematically fails to comply with ECtHR judgments, as revealed by the supervisory body's latest review of the implementation of the Court's judgments.

The review of the progress of the cases in the *Dimitrov and Others* group was scheduled for June 2025, and the Council of Ministers once again issued recommendations to Bulgaria – it called on the authorities to consider the need to criminalise the extraction of a confession from a suspect who has not yet been charged during the pre-trial phase, and to continue analysing the possible introduction of systematic video recording of suspect interrogations. Issues regarding the timely access to legal aid and notification of a third party, as well as prompt, confidential and accurate medical examinations and their recording at police stations and places of detention, remain under monitoring.⁵

The recommendations also include the establishment of a national system for collecting statistical data on complaints, criminal prosecutions, and disciplinary and criminal sanctions related to ill-treatment, as recommended by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment, and to provide detailed and comparable statistical data, as well as to support, through concrete measures, more intensive monitoring by the Ombudsman and expert NGOs.

It would be advisable to consider legislative changes to abolish the statute of limitations for crimes involving torture. In this way, there would be no statute of limitations for such cases, which are difficult and time-consuming to investigate, and they could be reopened even in the face of slow judicial proceedings and following a ruling of the ECtHR.

- **Case group *S.Z./Kolevi v. Bulgaria* – Violations of Articles 2 and 3 in connection with the ineffective investigation of complaints regarding death or inhuman treatment between private individuals**

The issue in both cases concerns the effectiveness of criminal investigations. The review of the progress in the *Dimitrov and Others* cases was scheduled for December 2025, at which time the Committee of Ministers again issued recommendations to Bulgaria and kept the cases under enhanced monitoring.

- **Case *Nencheva v. Bulgaria* – Violations of Article 2, right to life, lack of prompt and adequate measures to prevent the deaths of children placed in residential care facilities; lack of prompt and effective investigations into these deaths**

In the case of *Nencheva v. Bulgaria*, significant progress was made in 2025, and the case was removed from the enhanced monitoring mechanism.

- **Case *Stanev v. Bulgaria* – Violations of Articles 3, 5, 6, 8 and 13 regarding the legal status and rights of persons with intellectual disabilities; the unlawfulness of placing persons with mental disorders in social care homes: lack of judicial control and poor living conditions; inability of persons under legal disability to request restoration of their legal capacity**

The case *Stanev v. Bulgaria* is one of many cases that have been subject to enhanced monitoring for many years, without any effective measures actually being taken to address the problem. The reason is the lack of a comprehensive policy regarding support measures for individuals with mental health issues. One of the key issues concerns access to justice. A person placed in a facility by administrative order and subject to full legal incapacitation is not authorised to challenge independently the placement order before the administrative court without the consent of their guardian. If the person's opinion is not

⁵ [Bulgarian - Department for the Execution of Judgments of the European Court of Human Rights](#)

taken into account and their stay in the specialised institution is not terminated, they should have at their disposal a legal remedy that complies with the requirements of Article 5 (4) of the Convention, namely – at regular intervals, a procedure to review the necessity of continuing the placement should be initiated. Another option is for the person to have direct access to a court to challenge any prolonged placement against their will, even though they were initially placed voluntarily.

No progress was made on the case in 2025, as the 51st National Assembly rejected the possibility of introducing effective access to justice.

- **Case group *Ekimdzhiev and Others v. Bulgaria – Violations of Article 8 and Article 13 of the ECHR – lack of sufficient safeguards against the risk of abuse in the use of special investigative means and lack of effective domestic remedies***

No progress was reported in the case group *Ekimdzhiev and Others v. Bulgaria* in 2025.

- **Case *Kulinski and Sabev v. Bulgaria – Problems related to the citizens’ voting rights (Article 3 of the Additional Protocol)***

In accordance with Article 42, para 1 of the Constitution of the Republic of Bulgaria, persons serving the punishment of deprivation of liberty are not entitled to vote in elections for national and local authorities or to participate in referendums. In its judgment, the ECtHR holds that where the deprivation of the right to vote is applied automatically to a specific group of convicted persons, without any differentiation based on the gravity of the crimes committed or the length of the sentence of deprivation of liberty, it is incompatible with Article 3, Protocol No. 1 to the Convention. A review of the implementation of the ECtHR’s judgment in this case was conducted in September 2025. No progress was found – no steps had been taken to draft such an amendment; the authorities were urged to take the necessary steps immediately to draft the required constitutional reform to ensure a framework for the electoral rights of persons under limited guardianship and of convicted persons in places of deprivation of liberty that is in conformity with the Convention.

Main recommendations:

1. **Bulgaria is to sign and ratify Protocol No. 16 to the ECHR.**
2. Abolish the statute of limitation for crimes involving torture in view of the possibility to reopen proceedings following a conviction by the ECtHR or the award of additional adequate compensation with a view to the withdrawal of the victims’ claims and the closure of the monitoring of such cases;
3. Develop and implement specific rules for planning police operations, guidelines on how to respond if the spouse or children are present during an arrest, and training for police officers;
4. Provide for domestic remedies for people with intellectual disabilities;
5. Take urgent legislative measures to introduce sufficient safeguards against the risk of abuse in the use of special investigative means and introduce effective domestic remedies;
6. Take urgent steps to table the bill on natural persons and support measures before the Council of Ministers and the National Assembly;
7. Amend Article 42, para 1 of the Constitution of the Republic of Bulgaria and the relevant provisions of the electoral legislation in order to comply with the recommendations of the ECtHR;
8. Establish an effective mechanism to guarantee the right of association in all its aspects, in accordance with Article 11 of the ECHR;
9. Submit to the National Assembly, as soon as possible, the Bill to Amend and Supplement the Spatial Development Act, prepared in accordance with Order RD-02-14-652/28 June 2018, of the Minister of Regional Development and Public Works;
10. Adopt legislative measures to ensure that the affected bank is represented independently in the appeal proceedings concerning the revocation of its license and in the insolvency proceedings.

III. UN CONVENTION ON THE RIGHTS OF PERSONS WITH DISABILITIES

The UN Convention on the Rights of Persons with Disabilities (CRPD) is a foundational international instrument in the efforts to ensure that persons with disabilities enjoy equal rights and lead a life of dignity and independence.

An active advocate for the ratification of the Convention by the Bulgarian State, since 26 January 2012 the Ombudsman of the Republic of Bulgaria has actively utilised the mechanisms provided for in Article 19, para 1, item 12 of the Ombudsman Act to monitor and promote the effective implementation of the requirements of the international instrument.

Within the scope of its authority, the institution has repeatedly emphasised the need to take adequate and, at the same time, the swiftest possible measures to bring the existing legislation in line with the requirements of the Convention and to guarantee the rights of the citizens concerned and their families.

In the statements, the Ombudsman also urges that steps be taken as soon as possible to ratify the Optional Protocol to the CRPD.

To date, the Optional Protocol has only been signed, which deprives people with disabilities in the country of the opportunity to directly appeal to the UN Committee on the Rights of Persons with Disabilities to protect their rights.

The Ombudsman of the Republic of Bulgaria monitors the implementation of the CRPD and, pursuant to Article 11 *et seq.* of the Persons with Disabilities Act (PDA), as part of the Monitoring Council.

As part of the activities of the Monitoring Council, which is administered by the Ombudsman of the Republic of Bulgaria, four regular meetings were held in 2024 and 2025; as a result of the decisions taken, 11 recommendations and one opinion were drafted and sent to the relevant authorities.

The main findings from the Council's activities indicate that:

- The responsible authorities make efforts to overcome the existing issues in various areas related to the rights of people with disabilities.
- The measures taken to promote the employment of people with disabilities are not sufficient to meet the needs and capabilities of all job-seeking people with disabilities.
- The measures taken to reform the medical examination process have not yielded the expected and urgently needed results to address the difficulties faced by people with disabilities during medical examinations/re-examinations by medical examination authorities, as well as the significant delays in issuing expert decisions.
- Actions are taken to improve the organisation of the work of medical examination bodies, but not to carry out a comprehensive reform in this area.
- Steps have been taken to implement the concluding observations of the UN Committee on the Rights of Persons with Disabilities regarding women with disabilities, but these measures are insufficient to guarantee equality and the unimpeded exercise of rights under the CRPD.
- The measures to update the lists of assistive devices and medical devices do not contribute to the inclusion of products that meet the needs of people with disabilities.
- Not enough action is taken to address the delay in ratifying the Optional Protocol to the CRPD.

Main recommendations:

1. Seek additional mechanisms to support the employment of people with disabilities, particularly by increasing resources under the National Program for the Employment and Training of People with Permanent Disabilities.
2. Take action to continue the reform of medical expert examinations and work capacity assessments, including through the adoption of international standards, with the active involvement of representatives of people with disabilities in broad public discussions and public outreach.
3. Take action to ensure that the lists of assistive devices and medical devices are kept up to date and to improve their quality.

4. Take additional measures to safeguard the rights of girls and women with disabilities and to address the challenges related to the personal mobility of people with disabilities, including the delays in the project “Provision of Assistive Devices for People with Permanent Disabilities”.
5. Speed up the ratification process for the Optional Protocol to the CRPD.

IV. UN CONVENTION ON THE RIGHTS OF THE CHILD (CRC)

For the Ombudsman, one of the key factors for the proper implementation of the CRC is the introduction in Bulgaria of a mandatory requirement to conduct a **prior and subsequent assessment of the impact on children** and their rights for all types of decisions and policies affecting the child population, as well as the impact on groups of children with specific characteristics. The introduction of such assessments will help the government, state bodies and institutions to be more accountable to children and youth; to fill data gaps and improve cooperation among stakeholders regarding data sharing; encourage more studies on specific aspects of the impact on children’s rights where data is lacking.

For the purposes of horizontal monitoring of child rights protection, the Ombudsman reached out to Bulgarian institutions that, under the Child Protection Act (CPA), are designated as child protection agencies, by sending them specially designed questionnaires. This study includes targeted consultations with protection authorities to gather opinions on the feasibility, effectiveness and benefits of national policies for children. The questionnaires are structured around the overall implementation of the Convention, its optional protocols and the Committee’s recommendations.

Main problem areas and recommendations:

The recommendations to Bulgaria provide important guidance to strengthen national policies and practices in the area of children’s rights.

*“The Committee reminds the State party of the indivisibility and interdependence of all the rights enshrined in the Convention and emphasizes the importance of all the like to draw the State party’s attention to the recommendations concerning the following areas, in respect of which urgent measures must be taken: non-discrimination, freedom of the child from all forms of **violence**, children deprived of a family environment, education, asylum-seeking, refugee and migrant children and child justice .⁶*

The main challenges to their implementation can be summarised as follows:

- **Inter-institutional coordination**

Many of the recommendations require coordinated action by several institutions at the national, regional and local levels. Ensuring effective cooperation among different sectors, including social services, education, healthcare, justice and law enforcement, remains a key challenge in achieving a comprehensive and coordinated approach to children’s rights.

- **Harmonisation of legislation and policy development**

Certain recommendations require amendments to the existing legislation or the adoption of new policy frameworks. The legislative process involves numerous stakeholders and consultation stages which may prolong the time needed to achieve full compliance with the international standards.

- **Capacity and resources at the local level**

The practical implementation of the policies on the rights of the child depends, to a large extent, on the capacity of local structures and field specialists. In some cases, limited human resources, the uneven distribution of specialised services and differences in capacity among municipalities can affect the pace and consistency of implementation.

- **Data gathering and monitoring systems**

The Committee places a strong emphasis on the availability of comprehensive, disaggregated data for monitoring the situation of children and assessing the impact of policies. Although efforts are

⁶ Concluding observations of the Committee on the Rights of the Child regarding the combined sixth and seventh periodic reports of Bulgaria

being made to improve the national data systems, challenges remain in ensuring consistent data collection across different sectors and institutions.

- **Public awareness and professional training**

The effective implementation of the Convention's principles requires ongoing training for professionals working with and for children, as well as increased awareness among the general public regarding children's rights and the best interests of the child.

- **Sustainable long-term policy planning**

Many recommendations require sustained political efforts over several years, including the development of integrated strategies, monitoring mechanisms and sustainable funding. Ensuring continuity in policy priorities and adequate financial resources remains a key factor for successful implementation.

As a key initiative for 2025, the Ombudsman highlighted the **Plan for the Implementation and Monitoring of the Recommendations from the Concluding Observations of the UN Committee on the Rights of the Child addressed to our country**, prepared by the SACP. It was emphasised that the development of a mechanism for the implementation and monitoring of the recommendations of the UN Committee on the Rights of the Child was a recommendation that the Ombudsman institution had been making for several consecutive years, and it was a systematic part of monitoring the implementation of the Convention on the Rights of the Child.

In a specially prepared opinion on the draft plan, the Ombudsman emphasised that:

- The Plan for the Implementation of the Recommendations of the Committee on the Rights of the Child is a highly ambitious and extensive document that will be difficult to implement and monitor. It is recommended that consideration be given to identifying priority recommendations that can and must be implemented within a specific timeframe. In this regard, a special administrative unit should be established within the SACP to be responsible for the implementation and coordination of the Plan, as well as to develop specific guidelines for its implementation, and to create a dedicated section on the SACP website to document the work on the Plan.

- Attention was drawn to the need to introduce a requirement for regular reviews of the relevance of the measures and the progress made, to be conducted by a working group, as well as to involve other experts and professionals from various sectors and fields in this process. This approach is expected to ensure the effectiveness, transparency and sustainability of the monitoring process.

- An important part of the process of implementing and monitoring the recommendations is the requirement to prepare an annual progress report that highlights the challenges and recommendations for improvement.

- It was proposed that a requirement be introduced under the "Legislation" section to develop draft procedures and criteria to assess the impact of adopted legislative acts on children's rights, with such assessments to be conducted at the National Assembly level,

- It was noted that the authorities referred to in Article 6a of the CPA will face significant difficulties in "planning adequate human, technical and financial resources for the implementation and monitoring of the policy and action plan on the rights of the child," which necessitates the establishment of clearer and more specific obligations.

In 2025, significant legislative changes were made to the Family Code (FC), the CPA and the Criminal Code (CC); the amendments to the FC, specifically the introduction of "shared parenting", caused particular controversy.

Joint exercise of rights: The court may now order shared parenting even in the absence of an agreement between the mother and father, provided that it is in the best interests of the child.

Child Protection Act: Prevention and support

The amendments to this law are aimed at strengthening coordination among institutions.

- Measures against early marriage: New policies have been introduced to curb early cohabitation and teenage pregnancies.
- Improvement of social services: Expanding support for families and the development of gifted children.

Criminal Code: Stricter penalties for crimes against children

The criminal law has been updated to provide a higher level of protection.

- Enhanced protection for adolescents: Children aged 15 and 16 now receive the same special protection under criminal law in cases of sexual offenses as was previously provided only for minors under the age of 14.
- Stricter penalties: Up to 15 years in prison are envisaged for serious offenses against children under the age of 10.

The Ombudsman notes with particular concern that this is yet another year in which a National Strategy for Children has not been adopted, despite the fact that the draft strategy has been updated and endorsed by various public forums. The draft has also been coordinated with children, young people and parents. The draft National Strategy for the Development of Physical Activity, Physical Education, Sports and Tourism Activities for the next 12-year period, prepared by the Ministry of Youth and Sports, has not yet been adopted by the National Assembly.

In the area of coordination, challenges are evident between institutions and the implementation of coordinated and integrated actions. Unfortunately, in practice there is no effective cross-sectoral cooperation, including between social services, education, healthcare, justice and law enforcement. This remains a key challenge to achieving a comprehensive and coordinated approach to the rights of the child. New powers must be granted to the **National Council for Child Protection** in its capacity of the coordinating body for the implementation of the Convention across all sectors and at all levels.

Establish a budgeting process that takes into account the perspective of the rights of the child, with clearly defined budgetary allocations, as well as a monitoring and evaluation mechanism to ensure the appropriate, efficient and equitable distribution of funds.

The Committee's recommendations clearly address the challenges the country faces with **data collection**, emphasising the need to improve the national information system on children so that it can ensure the monitoring and analysis of the situation of children, including by ensuring sufficient resources and establishing a framework for monitoring children's rights that allows for systematic monitoring and analysis of data on children. It must be ensured that the data collected covers all areas of the CRC and is disaggregated by age, sex, disability, geographic location, ethnic origin and socioeconomic background. **The main expectations in this regard are for the SACP to implement a National Child Information System which is currently still under development.**

The level of conspiracy theories surrounding the protection of children's rights and civil society organisations remains alarmingly high.

Another serious problem is the **lack of sufficient and targeted investment in families**. Numerous support programs fail to contribute effectively to eradicating and breaking the cycle of poverty, which is a key driver of the main risks for children. Access to social assistance for poor families is often hindered by a lack of knowledge and information, heavy administrative barriers, restrictive conditions and discretionary provisions. The lack of comprehensive support and appropriate services for these families is among the main causes of this alarming situation. The main complaints from citizens who contact the Ombudsman are related to a sense of injustice.

Chronic problems in the child protection system – a lack of clear professional requirements for social workers in child protection departments, low pay, high workload, limited opportunities for training and supervision, which drastically limits the capacity for effective management of interagency work on complex cases of violence and risk situations.

A challenge for our country remains the reform of the juvenile justice system, a matter that has been the subject of constant criticism by the Ombudsman.

Main recommendations:

1. Ratify the Third Optional Protocol to the UN Convention on the Rights of the Child.
2. Introduce a mechanism to involve children in the development and fulfilment of policies and programs related to the implementation of the 2030 Sustainable Development Program.
3. Adopt a National Strategy for the Child.
4. Develop a special procedure to assess the impact on children's rights of all policies, regulations and administrative decisions relating to children.

5. Establish a mechanism to monitor and evaluate the adequacy, efficiency and fairness of the allocation of resources for the implementation of the Convention and its protocols.
6. Improve the data collection to cover all areas of the Convention.
7. Guarantee that all children have access to independent complaint mechanisms in schools, places of detention and deprivation of liberty, residential services, foster care.
8. Create mechanisms to monitor the quality of inclusive education and to guarantee that children with special educational needs are recognised as a target group by the National Education Inspectorate, thereby bringing inclusive education in line with quality assurance standards.
9. Develop targeted measures to address the problems with the high dropout rate of children with disabilities from the education system and to ensure the right of all non-verbal children and children with special needs to inclusive education in general schools.
10. Ensure systematic and mandatory training on children's rights, the UN Convention and optional protocols for all professionals working with children and introduce special classes in higher education programs.
11. Implement systematic reforms in the areas of juvenile justice and the protection of children at a disadvantage, including Roma, refugees, migrants, etc.
12. Take specific measures to prevent and condemn hate speech and investigate effectively specific cases.
13. Improve the coordination among the institutions in implementing the Coordination Mechanism for Unaccompanied Refugee Children and recognise the Mechanism as a working tool with a binding force. Encourage all participants in the process to sign the Coordination Mechanism.
14. Establish a model and practices for the placement of unaccompanied children who are foreign nationals in social services for children and implement a holistic support method that reflects their specific needs.

V. UN CONVENTION AGAINST TORTURE AND OTHER CRUEL, INHUMAN OR DEGRADING TREATMENT OR PUNISHMENT

The main recommendations made by the Committee against Torture in connection with the Sixth Periodic Report remain valid in 2025.

The Committee draws attention to the problems associated with 24-hour detention. The Bulgarian State is to ensure that all fundamental legal safeguards for detainees are guaranteed in practice, not merely on paper. Every detainee must be provided with access to a lawyer from the very outset of their detention. The Committee expresses its concern that, in the majority of cases, detainees do not have access to a lawyer from the very start of the criminal proceedings against them, and even if a lawyer is provided during the 24-hour detention, meetings take place in the presence of a police officer. Another problem is that, very often, arrested persons are not informed of their rights. Medical examinations are often conducted in pre-trial detention facilities and are not reflected in medical records.

Next, the Committee notes the problem of excessive use of force (particularly in the prisons in Sofia and Burgas), as well as in police detention facilities. The Committee also notes the poor conditions in places of deprivation of liberty, specifically problems related to the infrastructure, overcrowding, lack of hygiene and adequate sanitation facilities, insufficient access to water, inadequate heating, and a lack of trained staff. The Committee highlights problems with medical care in prisons, specifically: **shortage of medical staff; limited access to medication; unsatisfactory quality of medical examinations; limited access to psychiatric care; lack of special care for persons deprived of liberty who have physical and/or mental disabilities; lack of measures to address the widespread drug use and related problems such as HIV and hepatitis.**

Another important issue addressed in the Committee's report concerns the **problems of social institutions**. The Committee expresses its concern that persons with mental and psycho-social disabilities in state and municipal medical institutions continue to have limited legal capacity and lack adequate procedural and substantive legal safeguards for their protection. The Committee's report also highlights the **lack of sufficient independent monitoring** of such institutions, as well as the remote areas where these facilities are located. The Committee also addresses the issue of **excessive use of**

medication to restrict movement, the forced administration of irreversible psychiatric therapies, as well as violence among patients, including self-harm. Next, the Committee draws attention to the extremely poor **material and living conditions** in some institutions, which amount to inhuman and degrading treatment (poor hygiene, poor access to sanitary facilities, and others).

During the inspections, the Ombudsman identified systemic problems at SPH that are incompatible with the fundamental standards for protection against torture and other forms of cruel, inhuman or degrading treatment or punishment, such as:

- Degrading living conditions in state psychiatric hospitals;
- Chronic malnutrition among patients due to a flawed funding model;
- Deteriorating quality of medical care due to a shortage of staff and the absence of a sustainable policy to address it;
- Lack of social services to assist in the reintegration of patients in SPH.

Next, the Committee draws attention to the issues related to the situation of persons seeking protection and migrants. The Committee emphasises that States Parties to the Convention need to ensure that persons seeking international protection are not subjected to arbitrary detention, that judicial review of detention is provided and that alternatives to detention are available. Another major issue highlighted in the Committee's report is the registration of unaccompanied children as "accompanied" by adults with whom they have no relations. The Committee draws attention to the need to improve material conditions in reception centres to ensure an adequate standard of living, as well as to reduce overcrowding in migrant detention centres, particularly at the Special Centres for Temporary Accommodation of Foreigners (SCTAF) in Sofia and in Lyubimets.

VI. CONVENTION ON THE ELIMINATION OF ALL FORMS OF DISCRIMINATION AGAINST WOMEN

The monitoring identified significant systemic delays in the implementation of domestic violence protection measures, which were explicitly mandated by the legislature and overseen by the **National Council for the Prevention and Protection against Domestic Violence (under the Council of Ministers)**. The *Coordination Mechanism for Assistance and Support to Victims* was planned to become operational in January 2024, but was not adopted until 19 November 2025. The document was sent to the relevant authorities and legal entities for implementation, but the Council of Ministers does not monitor its implementation in a timely manner and does not have access to the data held by these authorities and legal entities. More than three months after the establishment of the Coordination Mechanism, there is no evidence that it has contributed to the prevention of and protection against domestic violence. By August 2024, a **National Information System for the Prevention and Protection against Domestic Violence** was supposed to be in place. More than 18 months later, its development is still pending.⁷

Although the number of **specialised social services under the Protection against Domestic Violence Act (PDVA)** is stipulated by law, the reality is different. The Secretariat of the National Council for the Prevention and Protection against Domestic Violence (under the Council of Ministers) allocates funds for such services, but is unable to provide data on how many such services there are compared to what is stipulated in the Implementing Regulations to the PDVA.⁸ **The 2025 and 2026 budgets allocate approximately EUR 230 081 for specialised services under the PDVA.**⁹ The State delegates these social services to NGOs on a project basis. Due to delays, the funds for 2024 were not utilised. [State funding for 2025 is more than eight months late](#). With these extremely limited funds for counselling centres, shelters and specialised programs for perpetrators, only nine such services were funded in 2025.

⁷ The Council of Ministers submitted the application to establish a National Information System for the Prevention and Protection against Domestic Violence on 16 January 2025, with a completion deadline of 16 March 2026.

⁸ Each administrative region shall have 1 counseling center for victims and 1 shelter; administrative regions divided into districts shall have at least 3 shelters and 3 counseling centers (Article 28, para 1, items 2 and 3, as well as Article 35 of the Implementing Regulations to the PDVA).

⁹ These activities are described as being carried out by legal entities engaged in prevention of domestic violence pursuant to Article 6e, para 6 of the PDVA and Chapter Three of the Implementing Regulations to the PDVA.

In Bulgaria, **there are still no comprehensive official statistics on cases of domestic violence, nor a complete official list of all services** suitable for victims of domestic violence or for perpetrators. Some of the available services are described in [the mobile app Help Me of the National Legal Aid Office \(NLAO\)](#).¹⁰ The others include the [National Social Services Map](#) at the SAA, as well as the [Map of services, organisations and programs of Association Animus Foundation](#). **The SAA notes that there is a shortage and uneven distribution of social services** which are potentially suitable for the needs of victims of domestic violence.¹¹ As of 31 December 2025, these are as follows: **19 crisis centres for children** (203 places), **13 crisis centres with a combined capacity** (161 places), **12 Mother and Baby units** (75 places) and **174 community support centres (CSCs)** (8145 places), with only some of them able to provide support. Access to these vital services in the 28 regional cities remains **without significant improvement** in 2025.¹²

Free legal consultations are provided to victims of domestic violence if the NLAO has an agreement with one of the Regional Counselling Centres (RCCs) affiliated with the bar associations – **this depends on both the capacity and the willingness of the respective bar association to work on the matter. In 6 regional cities (out of a total of 28), no such service is available.** The NLAO has a legal aid hotline: (+359) 0700 18 250. The maximum call duration is 20 minutes and there is a charge for the call. Given the nature of the psychological and economic abuse, the **need** to travel to a distant city or make a paid phone call to access otherwise free legal aid further complicates breaking the cycle of domestic violence and increases the risk of retaliation for victims whose movements and expenses are being monitored. This is important because legal aid is a key tool for helping victims of domestic violence file a request for protection with the court.¹³

The MoI reports a significant improvement in statistics and the traceability of cases handled by police officers. The *Automated National System for Domestic Violence and Gender-Based Violence* has been operational as of 1 January 2025. Through this system, the MoI registers protection orders issued by the courts, as well as the number of perpetrators and victims, broken down by gender and age. For 2025, the MoI reports 5,102 protection orders (compared to 5,252 in 2024 and 4,429 in 2023). There were 5,279 perpetrators of domestic violence in 2025, of whom 88% men and 12% women. Of the total number of victims in 2025, women accounted for 66% (compared to 68% in 2024 and 66% in 2023), children accounted for 24% (compared to 25% in 2024 and 24% in 2023), and male victims accounted for 10% (an increase of 7,8% compared to 2024 and 16% compared to 2023). The MoI reports the following figures by type of violence for 2025: psychological – 5,655; physical – 3,418; economic – 160; sexual – 69. According to the MoI, the total number of violated protection orders in 2025 was 476.

Undoubtedly, male victims of domestic violence face stereotypical barriers and social stigma when reporting incidents to the authorities – **this must be taken seriously.** At the same time, the statistics show that **women are significantly more likely to suffer from domestic violence.** This also applies to **cases with fatal outcomes.** According to [spasena.org](#), in 2025 there were at least 24 cases reported in the media of women murdered by men, with domestic violence suspected in over half of them. The MoI notes that these cannot be compared with police statistics. For 2025, the MoI recorded two cases of women murdered in the context of domestic violence (3 in 2024, 2 in 2023, and 1 in 2022).¹⁴ The frequent media coverage of such murders, the lack of comprehensive official statistics and the prevailing sense of underestimation, impunity and injustice further erode the public trust in institutions.

According to the [2025 Gender Equality Index](#), based on overall indicators, **Bulgaria is the only EU Member State where a deterioration is reported by 2025 compared to 2020** (a decline of 0.7

¹⁰ For 2025, the NLAO reports 771 downloads and 2759 launches of the mobile app.

¹¹ [Report on the Activities of the National Council for the Prevention and Protection against Domestic Violence and the Implementation of the National Program for the Prevention and Protection against Domestic Violence for 2024](#)

¹² At the end of the year, 11 regions had no operational crisis center. Currently, 17 regions have no crisis center for adults, and 13 regions have no such center for children .

¹³ In 2025, there were 132 decisions to grant legal aid for domestic violence (139 in 2024).

¹⁴ [National Program for the Prevention and Protection against Domestic Violence 2024 – 2026](#), p. 3.

percentage points). The gender pay gap for 2023 is 13.5%, and for 2022 it is 12.6%.¹⁵ The MLSP does not provide information regarding the question posed about measures and policy outcomes aimed at achieving a work-life balance. Unfortunately, neither the Council of Ministers nor the MLSP has provided answers to the questions regarding what measures were taken in 2025 in response to four specific recommendations from the UN Committee on the Elimination of Discrimination against Women (CEDAW Committee).¹⁶

The national reports on equality, as well as those on the prevention of and protection against domestic violence, tend to be descriptions of actions taken by various agencies, without an in-depth analysis of the results of these actions and without the use of qualitative indicators. There is rarely any information from any agency regarding difficulties in implementing policies in this area, and when there is, **it includes a lack of the following**: sufficient crisis centres to accommodate women, men and children who are victims of domestic violence; sufficient programs to work with perpetrators of domestic violence; targeted funding for prevention across the country; active NGOs in small towns and villages; a functioning unified National Information System to collect and process data on domestic violence; recognition of domestic violence as a public issue (it is currently viewed as a private matter). Unfortunately, **gender stereotypes** are a major cause of these inequalities and affect all areas of society. Stereotypes regarding domestic violence are sometimes evident in the actions of government agencies as well.¹⁷ Behind the multitude of policies and strategic documents lies a lack of coordination among institutions, delays (including those due to a lack of prioritisation and human resources), and a lack of in-depth analysis of the problems and the results of the adopted policies, which leads to a tendency to automatically report progress simply because some actions have been taken. Given that these conditions are combined with the delayed Coordination Mechanism, the lack of a National Information System and the lack of comprehensive official statistics, the shortage and uneven distribution of social services, and the failure to update future plans in a timely manner based on past actions, **the government policy to combat domestic violence cannot be unified, consistent, sustainable, effective and timely. The reality does not support the claim made to the UN that gender equality is a long-term priority and a success.**

¹⁵ Data from Eurostat and the [National Statistical Institute under Goal No. 5](#) of the [UN Sustainable Development Goals](#). Bulgaria's second voluntary national review on their implementation is available [here](#).

¹⁶ Related to General Recommendation No. 33 (2015) of the CEDAW Committee ([CEDAW/C/BGR/CO/8](#)). [36 of the decisions of the CEDAW Committee are available in Bulgarian at the NIJ Digital Library](#). There is no clarity as to whether and when Bulgaria plans to ratify the *International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families* and the *International Convention for the Protection of All Persons from Enforced Disappearance*.

¹⁷ [In response to the Committee of Ministers of the Council of Europe regarding two ECtHR cases against Bulgaria](#), the national position states that *the main causes of domestic violence in Bulgaria are primarily factors such as political and economic uncertainty, stress, personal trauma and others*. **This position not only downplays the role of inequalities in domestic violence and the responsibility of the State to address them, but also contradicts the policy of the State on gender equality.**



CHAPTER FOUR: RESOURCES

I. 2024 BUDGET

The Ombudsman of the Republic of Bulgaria is a first-level budget spending unit managing the funds in compliance with and application of the provisions of the Public Finance Act, the State Budget Act, the Ombudsman Act, the Rules of Procedure for the Organisation and Activities of the Ombudsman, and other statutory instruments related to the expenditure of public funds.

The Ombudsman institution has developed and implements Rules for the Establishment of Financial Management and Control Systems. The Ombudsman institution applies the double signature system, rules on access to assets and information, and preliminary legality checks carried out by a financial controller. The double signature is affixed after the documents have been checked before a decision is made to take on or incur expenditure.

The accounting policy of the Ombudsman institution has been developed and is based on the Accountancy Act, the National Accounting Standards, the Chart of Accounts for Budgetary Enterprises, the Individual Chart of Accounts of the institution, and other statutory instruments. Since 2017, fixed assets have been depreciated and amortised which will continue in the future. An annual inventory was carried out.

The annual cash execution report, the annual trial balance and the accompanying financial statements for 2025 have been prepared in accordance with Act 11 of 17 December 2025, issued by the Ministry of Finance.

The State Budget Act allocated to the Ombudsman of the Republic of Bulgaria for 2025 a budget of BGN 4 820 400; the revised plan for 2025 is also BGN 4 820 400.

Reported revenue for 2025 under the relevant line items – BGN 870.

In performing its activities as the high constitutional body for advocacy for the citizens' rights and freedoms, the Ombudsman of the Republic of Bulgaria spends funds from the state budget and additional funds for capital expenditures, observing the principles of economy and efficiency.

Reported expenses for 2025 under the relevant line items – BGN 4 618 745.

The main resource of the Ombudsman of the Republic of Bulgaria is the team of highly qualified professionals. Staff remuneration and social security contributions make up the largest part of the institution's budget expenditure.

The Ombudsman of the Republic of Bulgaria is a member of various international organisations for which membership fees are paid – Global Alliance of National Human Rights Institutions, International Ombudsman Institute, Organisation of Ombudsmen and Mediators of La Francophonie, European Network of National Human Rights Institutions, European Network of Ombudspersons for Children.

All applicable state and municipal taxes and fees have been paid.

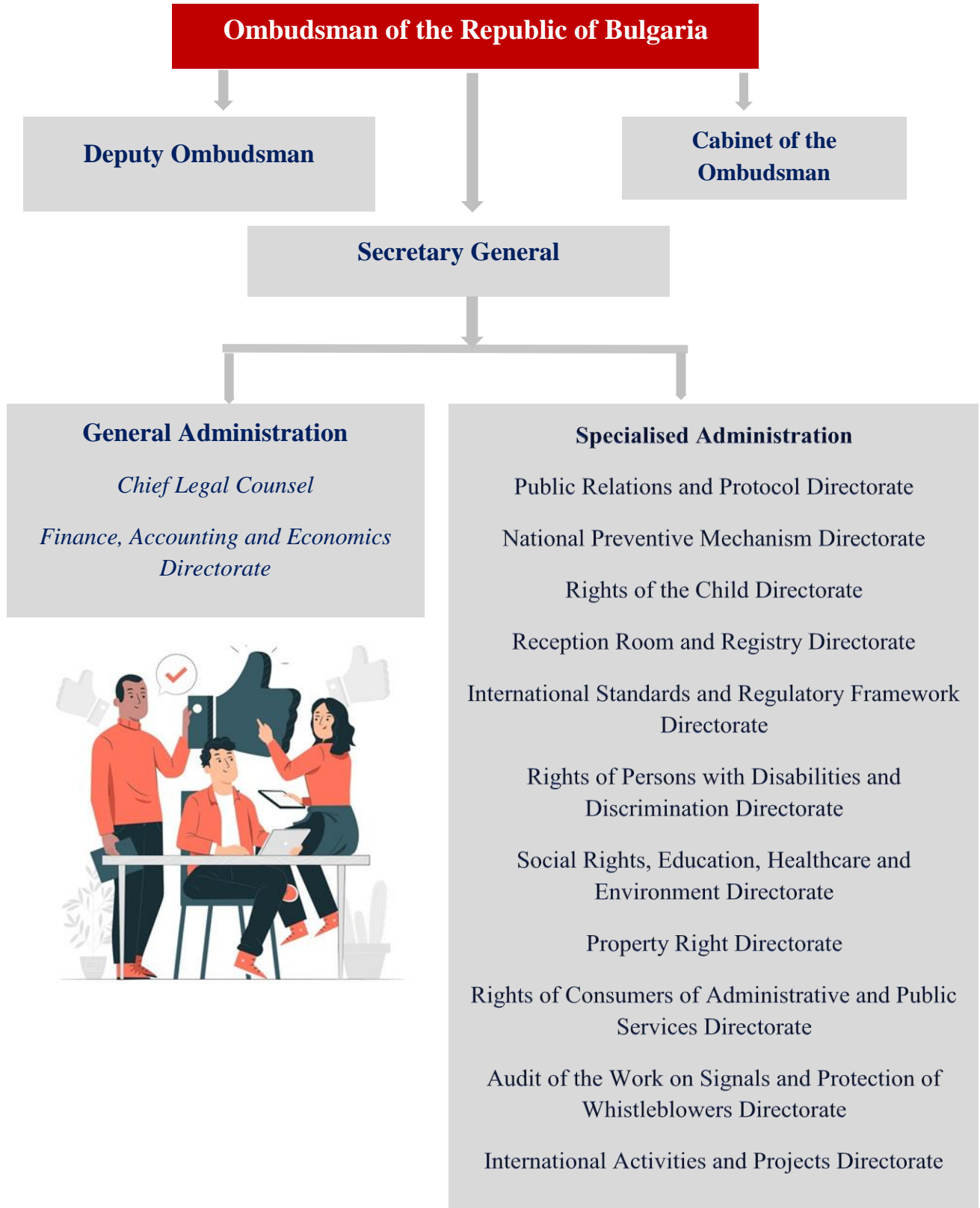
The maintenance expenses are intended to cover the institution's needs for office supplies, office equipment and consumables, water, fuel, electricity, and heat, telephone and internet services, hardware and specialised software maintenance, translation services, prepress and printing services, routine repairs, security, business travel, insurance, and other expenses. To a significant extent, these expenses are related to contractual commitments and obligations involving corresponding regular payments. The largest relative share (45.2%) of "Maintenance" is the portion of expenses for the rent of the building (privately owned) in which the institution is housed.

The capital expenditures as an expense for the institution amount to BGN 110 736 – a vehicle and equipment were acquired.

Pursuant to the Public Procurement Act, performance guarantees from non-budgetary legal entities totalling BGN 3,750 were available in 2025. Prior to the date of this Report and in accordance with the contract, 50% of the funds were reimbursed to the contractor following the completion of the contract.

II. TEAM

Structure of the National Ombudsman Institution



III. COOPERATION WITH THE CIVIL SOCIETY AND THE ACADEMIC COMMUNITY



13 February – Working meeting between the BHC and the institution’s Secretary General, the Chief of Staff and NPM experts.



24 March – An inaccessible architectural environment, particularly in schools and universities across the country; a lack of lifts and restrooms for people with disabilities; an inability to participate in sports in properly equipped facilities; a shortage of funding under the National Program Ensuring a Modern, Safe and Accessible Educational Environment – these issues were discussed at a meeting of experts from the Ombudsman institution and young people from the Spina Bifida and Hydrocephalus – Bulgaria Association.

The young people emphasised that the budget of BGN 900,000 and the program’s scope of just 14 projects per year were highly insufficient for the 2,300 schools in the country. They urged the Ombudsman to advocate with the Ministries of Education and Finance to increase these funds so they can reach more schools, because according to their calculations, “if we continue at this pace, it will take 170 years for Bulgaria to have an accessible architectural environment in the education system.”



10 April – At the Ombudsman institution, the members of the Monitoring Council approved the 2024 annual report, which details all actions taken to fulfill the Ombudsman’s functions of protecting, monitoring and promoting the Convention on the Rights of Persons with Disabilities in Bulgaria.

The Monitoring Council is a body responsible for monitoring the implementation of the UN Convention on the Rights of Persons with Disabilities, established pursuant to Articles 11–16 of the Persons with Disabilities Act.

The 2024 Report includes the opinions submitted to the relevant authorities regarding issues in medical evaluations, the amount of disability pensions during the appeal period of expert decisions by the TEMC/NEMC, the provision of medical devices and assistive devices, accessibility of the environment, and the challenges for children with special educational needs and their families.

21 May – The Ombudsman institution turned to Minister of Health Silvi Kirilov, the Director of the National Health Insurance Fund (NHIF) Petko Stefanovski, the Chair of the NHIF Supervisory Board Yavor Penchev, and the Chair of the Bulgarian Medical Association Nikolay Branzalov regarding the inability of the Health Insurance Fund to cover the cost of biomarker diagnostics, which are mandatory in modern oncology. The reason – **a letter from the Living with Cancer Foundation regarding the violation the rights of cancer patients to access proper diagnostics, which hinders their ability to receive modern medical care and ensures adequate and timely drug treatment.**

24 юли – In response to serious allegations of severe abuse of children at the Hristo Botev Social Educational Boarding School (SEBS) in the village of Varnentsi, Tutrakan Municipality, in her capacity as the National Preventive Mechanism, Ombudsman Velislava Delcheva, within the scope of her powers, conducted an ad-hoc inspection at the SEBS in the village of Varnentsi, where juvenile boys are housed.



30 July – Ombudsman Velislava Delcheva turned to Acting Chief Prosecutor Borislav Sarafov, the chair of the Local Commission for Combating Juvenile Anti-Social Behaviour in Sliven Pepa Chilikova, Minister of Education and Science Krasimir Valchev, Executive Director of the Social Assistance Agency Anna Ananieva, and Chair of the State Agency for Child Protection Teodora Ivanova regarding alarming reports received from UNICEF – Bulgaria and the Bulgarian Helsinki Committee, alleging severe violence against children at the Hristo Botev Social-Educational Boarding School (SEBS) in the village of Varnentsi, Tutrakan Municipality.



12 August – Working meeting between Ombudsman Velislava Delcheva and the UNICEF Bulgaria team led by representative Christina de Bruin.

19 August – *“As the National Ombudsman, I am here today to declare openly my unwavering commitment to the development and strengthening of foster care, because one of the priorities I have set for myself is precisely children at risk. I know that, for most young people, leaving foster care represents an abrupt disruption of the support on which their emotional stability, access to education, employment and housing depend. That is why we, as institutions, have a duty to transform leaving this care not into a single event, but into a process that requires careful planning and accompanying the young person through it to achieve effective social integration.”* This is what Ombudsman Velislava Delcheva said at the opening of the photo exhibition “The Transformed: Life after Foster Care” held at the Central Halls in the capital.



2025 ANNUAL ACTIVITY REPORT



26 August – Working meeting between Ombudsman Velislava Delcheva and Marieta Gecheva, Program Manager for Child Protection at the Lachezar Tsotsorkov Foundation.



26 August – Working meeting between Ombudsman Velislava Delcheva and the leadership of the National Youth Forum.

5 September – Ombudsman Velislava Delcheva signs a cooperation agreement with Seda Kuzucu, UNHCR Representative in Bulgaria.



12 September – Ombudsman Velislava Delcheva established an Advisory Council of experts from the non-governmental sector which meets to discuss priority issues in the field of human rights protection.



16 September – *“When we speak, act and plan, let us, institutions, citizens and non-governmental organisations, always be allies, never enemies.”* With this message, Ombudsman Velislava Delcheva opened the first panel, “The Voice of Citizens: Silence or Institutional Deafness?” at the Democratic Mosaic festival, which brought together over 70 civil society organisations in Sofia for the third year in a row.

The festival, organised by the Civic Participation Forum, the National Youth Forum and the Bulgarian Centre for Not-for-Profit Law, featured 20 thematic workshops ranging from youth policies and social initiatives to healthcare, education, volunteering and environmental protection.



23 September – *“My fundamental position is that children under the age of 14 are at risk and should under no circumstances come into contact with the law. They need support and protection. This is one of the issues I will advocate for during the working group at the Ministry of Justice.”* This was stated by Ombudsman Velislava Delcheva at a roundtable discussion titled “Rights and Support for Children in Conflict with the Law” organised by the Center for the Study of Democracy.

1 October – At a formal ceremony in Hall 6 of the National Palace of Culture marking the 15th anniversary of the Teach for Bulgaria Foundation, Ombudsman Velislava Delcheva congratulated the organisation and expressed the institution’s readiness to partner with it in its mission to create a more equitable and sustainable educational environment.

“Let us all continue to work together to build a more equitable and sustainable educational environment in Bulgaria. You prove that change is possible when we work together, when we are patient, and when we don’t lose hope,” Delcheva emphasised.



15 October – *“It is an honour for me to extend my greetings to you on the occasion of the opening of the new academic year at the Krastyu Tsonchev Center for Legal Education, a hub of professionalism, ethics and a commitment to excellence.”* With these words, Ombudsman Velislava Delcheva opened the ceremony, emphasising the significant role of the legal profession.



17 October – An address from Ombudsman Velislava Delcheva on the occasion of the conference Law and Business in Contemporary Society organised by the University of Economics – Varna.



18 October – Ombudsman Velislava Delcheva turned to Sofia Mayor Vasil Terziev, Sofia Municipality Chief Architect Bogdana Panayotova and Chair of the Standing Committee on Spatial Development Sevdalina Petrova, urging them to take immediate action and issue a statement to prevent the development of the Boyana Marsh and save its ecosystem.

“My recommendation is to submit a proposal for an ex officio amendment to the current general and detailed development plans in order to establish permanent protected status for the Boyana Marsh, which serves important ecological and protective functions against the harmful effects on water,” Velislava Delcheva wrote.

The Ombudsman received photographs of protected bird species taken by Georgi Gavrilov and Georgi Kamov in a competition organised by the Protection of the Boyana Marsh Association.



20 October – Under the leadership of Ombudsman Velislava Delcheva, the Monitoring Council under the Persons with Disabilities Act discussed the challenges faced by children from vulnerable groups and the lack of effective support policies.



20 October – Ombudsman Velislava Delcheva and UNICEF Representative in Bulgaria Christina de Bruin signed a new inter-institutional work plan implemented in accordance with the Memorandum of Understanding and Cooperation between the Ombudsman institution and UNICEF for the period 2023–2027.



21 October – Ombudsman Velislava Delcheva conducted an open class on Civic Education at the Vasil Levski Vocational Secondary School in Mezdra. The event was part of the Ombudsman’s initiative to promote civic engagement and awareness of fundamental human rights among young people.



29 October – *“To be the leaders of your own lives, focus on knowledge and never give up.”* This was stated by Ombudsman Velislava Delcheva during an open class on civil education at the Ivan Vazov Secondary School in Pomorie. The event was organised at the invitation of Headmistress Petya Kazakova and involved students and leadership from three schools – the host school, the Aleko Konstantinov Vocational Secondary School of Tourism and the Lyuben Karavelov Secondary School in Nesebar.



5 November – Ombudsman Velislava Delcheva welcomed participants to the two-day forum Euro Days at UNWE organized by the UNWE Institute of Economics and Policy and the Bulgarian National Bank.

In her remarks, Delcheva emphasised that the discussion regarding Bulgaria’s accession to the Eurozone was, above all, a conversation about trust – trust in institutions, in government decisions and in society itself.

“The introduction of the euro is not merely an economic act, but also a profound social change. This change affects everyone: from the pensioners who keep an eye on prices at the store to the young entrepreneurs thinking about investments and growth,” the Ombudsman pointed out.



11 November – *“The Ombudsman institution can serve as a warning light, a watchful eye, which is, in fact, the symbol of the Ombudsman in Bulgaria. that observes, alerts and reacts proactively whenever it detects threats.”* This was stated by Ombudsman Velislava Delcheva during the third panel, “Fundamental Rights and Civil Society Defenders in the Crossfire of Global Politics,” organised by the Centre for the Study of Democracy as part of the conference “Defence and Democracy Dialogue: Fortifying Freedom.”

The forum brought together leading politicians and analysts from Bulgaria and abroad to discuss the challenges for security and democracy in Europe.



21 November – *“It is an honour and a privilege for me, on behalf of the Ombudsman institution, to extend my congratulations to the entire academic leadership and to you, the students of the Vasil Levski National Sports Academy, on the occasion of the Academy’s Day.”* With these words, Deputy Ombudsman Maria Filipova extended her official greetings to the academic community of the National Sports Academy.



25 November – *“Every time a woman speaks out about her experience, she does so in her own name, but also on behalf of all women, children and victims of domestic violence. This requires courage and support, which must be timely and adequate.”* With these words, Ombudsman Velislava Delcheva addressed Rosa, a participant in the conference “Women’s Voices in Support of the Law,” organised by the Animus Association Foundation under the aegis of the Minister of Justice on the occasion of 25 November, the International Day for the Elimination of Violence against Women.



28 November – “Violence against and among children is not ‘part of growing up.’ It is not inevitable. It is not normal.” Ombudsman Velislava Delcheva emphasised this at the opening of the forum “Our Children, Our Responsibility: The (Ir)reparable While We Wait for Effective Solutions” organised by the Lachezar Tsotsorkov Foundation.

The priorities Delcheva highlighted included the reform of the juvenile justice system; effective measures against child abuse and domestic violence; enhanced cooperation between institutions and civil society; greater awareness of reporting mechanisms; responsible media coverage of issues related to violence.



3 December – An address of the Ombudsman on the occasion of 3 December: “*On the International Day of Persons with Disabilities, I address you with deep respect – to congratulate you on the strength, dignity and courage with which you defend your rights and overcome countless visible and invisible barriers every day. This day is not just a date on the calendar. It serves as a reminder that your voice, your rights and your human dignity must be at the centre of public care and attention. From my very first day as Ombudsman, I have made the protection of the rights of people with disabilities one of my top priorities ...*”

The long-standing issues regarding access to medical devices, assistive devices and facilities for people with disabilities are the focus of a meeting of the Monitoring Council under the Persons with Disabilities Act whose members include Ombudsman Velislava Delcheva and Deputy Ombudsman Maria Filipova. The meeting was convened by the administrative body, the Commission for Protection against Discrimination (CPD), to mark 3 December, the International Day of Persons with Disabilities. In addition to members of organisations for people with disabilities, representatives of the National Council for People with Disabilities were also in attendance.



4 December – *“The lack of adequate medical care, the shortage of trained staff and the risks faced by unaccompanied children remain critical issues in the asylum seeker protection system.”* Ombudsman Velislava Delcheva stated this at the opening of the forum “Guaranteeing Human Rights at Europe’s Borders” organised jointly by the National Institute of Justice, UNHCR and the Council of Europe’s Department of Migration and Refugees.



8 December – Evictions and the lack of alternative housing, “invisible people” without documents or access to healthcare, issues related to education and employment, and social prejudice. Ombudsman Velislava Delcheva highlighted these issues in her remarks at the National Roundtable: “From Data to Action: Findings on the Situation of Roma in Bulgaria from the EU Agency for Fundamental Rights Study”.



9 December – Ombudsman Velislava Delcheva organised her first outreach reception room for citizens in the town of Slivnitsa, with active participation from students at St. St. Cyril and Methodius Secondary School. The young people asked questions regarding the possibility of completing their secondary education in the 11th grade, as well as the challenges they faced in their future careers due to the lack of professional experience and qualifications.

Earlier that day, Velislava Delcheva also visited the Nikola Y. Vaptsarov Vocational Secondary School where, at the invitation of the Student Council, she conducted an open class on Civic Education dedicated to the International Human Rights Day, 10 December. During the discussion, she emphasised

the fundamental connection between the right to education, the right to life and personal integrity, as well as the need for students to grow up in a safe and healthy environment.



17 December – Ombudsman Velislava Delcheva delivered an open class on Civic Education at the Sixth Secondary School St. St. Cyril and Methodius in Pernik, founded in 1843 as a monastery school. Students from grades 10–11 discussed with Delcheva the rights of children and young people, as well as the role and powers of the National Ombudsman. It also became clear that the Sixth Secondary School St. St. Cyril and Methodius had its own school Ombudsman and published a student newspaper.



22 December – Ombudsman Velislava Delcheva accepted an invitation from Roma children and took part in an open art class at Kiril Vasilev’s studio in the Nadezhda residential estate of Sofia. Together with the young people, Delcheva took her “first steps” in drawing circles, ellipses and squares.

The host explained that he worked with children at risk, helping them overcome their difficulties through art and sculpture. He expressed his gratitude for the support of the Vrabnitsa District where he worked as a community educator. In his words, this was his “mission” – instead of the children turning to a life of crime, every Sunday they visited his studio to learn moral values through drawing, religion and sports.



LIST OF ABBREVIATIONS USED

AASRTA	Act to Amend and Supplement the Road Traffic Act
ADHD	Attention-Deficit/Hyperactivity Disorder
AGCC	Agency for Geodesy, Cartography and Cadastre
ATM	Automated teller machine
BHC	Bulgarian Helsinki Committee
BGN	Bulgarian lev
BNB	Bulgarian National Bank
CA	Competent authorities
CAP	Common Agricultural Policy
CCP	Commission for Consumer Protection
CCR	Central Credit Register
CEDAW	Committee on the Elimination of Discrimination against Women
CMCR	Cadastral maps and cadastral registers
CPA	Child Protection Act
CPD	Child Protection Department
CPEA	Chamber of Private Enforcement Agents
CRC	Convention on the Rights of the Child
CRPD	Convention on the Rights of Persons with Disabilities
CRRNPLEA	Commercial Register and Register of Non-Profit Legal Entities Act
CPT	Committee for the Prevention of Torture
CSC	Community support centre
DDP	Detailed development plan
DGCOC	Directorate General for Combating Organised Crime
EA	Energy Act
EAM	Executive Agency for Medicines
ECHR	European Convention for the Protection of Human Rights and Fundamental Freedoms
ECtHR	European Court of Human Rights
EDC	Electricity distribution company
EDTWA	Excise Duties and Tax Warehouses Act
EIA	Environmental impact assessment
EMAC	Emergency medical assistance centre
ENNHRI	European Network of National Human Rights Institutions
EU	European Union
EUR	Euro
EWCD	External Whistleblowing Channel Directorate
EWRC	Energy and Water Regulatory Commission
FBCA	Family Benefits for Children Act
FC	Family Code
GDP	General development plan
GDPR	General Data Protection Regulation
GIS	Geographic information system



ОМБУДСМАН
НА РЕПУБЛИКА БЪЛГАРИЯ

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GTC	General Terms and Conditions
HCAC	Heat cost allocation company
HIA	Health Insurance Act
IDC	Independent daycare centre
LPG	Liquefied petroleum gas
LRRBECtHRD	Legal Representation of the Republic of Bulgaria before the ECtHR Directorate
LSGLAA	Local Self-Governance and Local Administration Act
MAC	Medical Advisory Commission
MES	Ministry of Education and Science
MH	Ministry of Health
MoI	Ministry of Interior
MoJ	Ministry of Justice
MLSP	Ministry of Labour and Social Policy
MRDPW	Ministry of Regional Development and Public Works
NA	National Assembly
NEA	National External Assessment
NEMC	National Expert Medical Commission
NFA	National Framework Agreement
NGO	Non-governmental organisation
NHIF	National Health Insurance Fund
NLAO	National Legal Aid Office
NPM	National Preventive Mechanism
NRA	National Revenue Agency
NSSI	National Social Security Institute
OA	Ombudsman Act
OGCC	Office for Geodesy, Cartography and Cadastre
PDA	Persons with Disabilities Act
PDPC	Personal Data Protection Commission
PDVA	Protection against Domestic Violence Act
PSSEA	Pre-school and School Education Act
RA	Roads Act
RCC	Regional counselling centre
REO	Regional Education Office
RES	Renewable energy sources
RHI	Regional Health Inspectorate
RIA	Road Infrastructure Agency
RLP	Regulated land plot
RMER	Regional medical examination registry
RTA	Road Traffic Act
RWSSSA	Regulation of Water Supply and Sewerage Services Act
SAA	Social Assistance Agency
SACP	State Agency for Child Protection
SAD	Social Assistance Directorate



ОМБУДСМАН
НА РЕПУБЛИКА БЪЛГАРИЯ

2025 ANNUAL ACTIVITY REPORT

SCA	UN Sub-Committee on Accreditation
SCTAF	Special Centres for Temporary Accommodation of Foreigners
SEBS	Social Educational Boarding School
SEN	Special educational needs
SM	Sofia Municipality
SPH	State psychiatric hospital
STEM	Science, Technology, Engineering, Math
TEMC	Territorial Expert Medical Commission
UN	United Nations
UNHCR	United Nations High Commissioner for Refugees
UNWE	University of National and World Economy
VET	Vocational education and training
VTC	Vocational Training Centres
WSS	Water supply and sanitation

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