

## **Cyber Violence against Women in Bulgaria – Emerging Obligations and the Path Forward**

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# **Policy Paper Cyber Violence against Women in Bulgaria – Emerging Obligations and the Path Forward**

*Gergana Tzvetkova\**

## Abstract

This paper discusses the implications of the newly adopted European Union Directive on Combating Violence against Women and Domestic Violence considering the utmost importance of addressing cyber violence against women and girls. We begin by an overview of the existing literature and the main topics related to cyber violence against women and girls, as we try to highlight some of the key challenges to tackling this phenomenon. This is followed by a description of the current situation in Bulgaria with respect to preventing violence against women and protecting survivors. We then centre on the importance of the newly adopted EU Directive and some of its key provisions. Based on the obligations borne out of the Directive and good practices from other European countries, we propose several policy recommendations that decision- and policymakers in Bulgaria may consider for the implementation of the new Directive. These relate to the need to adopt relevant and recent international and regional documents, ensure the collection of comprehensive data on cyber violence against women and stimulate the collaboration among different stakeholders.

*Keywords: gender, violence against women, Bulgaria, policy, EU Directive*

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## Introduction

With this policy paper, we underscore the need to vigorously study and effectively address a problem, which is rapidly growing on a global scale – cyber violence against women and girls (CVAWG<sup>1</sup>). It is built around the promises, the expectations, and the obligations arising out of the 2024 European Union (EU) Directive on combating violence against women and domestic violence (hereafter referred to as the EU Directive). After highlighting some key insights about CVAWG from academic literature and practice, we formulate policy recommendations to serve Bulgarian policymakers, legislators, and practitioners. Bulgaria has not ratified the Council of Europe Convention on Preventing and Combating Violence Against Women and Domestic Violence (hereafter referred to as the Istanbul Convention), which makes the implementation of the EU Directive in the country even more crucial.

CVAWG is only one of several terms used to describe malicious and harmful acts and behaviours, which comes to support the argument that a common and widely used definition will benefit the efforts to address these phenomena in a more comprehensive and effective manner. In literature, practice, and policy, we encounter the terms online/digital/cyber violence/abuse or technology-facilitated violence. An interesting and useful observation is that ‘EU organisations (e.g. EIGE, the Advisory Committee on Equal Opportunities for Women and Men) tend to refer to ‘cyber violence’ whereas academic literature prefers ‘online or digital violence’ (EWL 2024, 16). This paper adopts the term CVAWG, which aligns with the terminology employed by the EU Directive, as its future implementation by the member states is at the heart of the present study. We will elaborate on the specific provisions of the directive with respect to cyber offences in the sections that follow.

## 1. Cyber Violence against Women and Girls – Problem Overview

CVAWG is a deepening problem on a global scale, steadily finding its way into the agenda of legislators, policymakers, and practitioners largely because of the efforts and the engagement of civil society organisations (CSOs), feminist activists, researchers and academics. CVAWG is a multifaceted phenomenon with numerous problematic aspects – for instance, malicious content, abuse,

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<sup>1</sup> While CVAWG is an abbreviation for cyber violence against women and girls, VAWG is an abbreviation for violence against women and girls.

and hate speech spread very quickly online, are difficult to remove and often involve and reach thousands, even millions, of users. Importantly, such acts, regardless of whether they are intentional or not, cause distress and suffering to victims, who often feel helpless and unprotected, wanting to leave online spaces or stop using technology.

The interest in the topic on the part of the academic community, research institutions, international and national human rights organisations, and activists is growing. Understandably, this has resulted in more literature and knowledge on what constitutes violence committed through technology, its effects, types, roots, and relation to offline abuse.

In its General Recommendation No. 1, the Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO) contends that violence against women in its digital dimension ‘encompasses both online aspects (activities performed and data available on the internet, including internet intermediaries on the surface web as well as the dark web) and technology-facilitated (activities carried out with the use of technology and communication equipment, including hardware and software) harmful behaviour perpetrated against women and girls’ (GREVIO 2021, 13). In academic literature, Dunn argues that technology-facilitated violence ‘can be recognized by looking for behaviors that control, dominate, and instill fear in the person targeted, particularly those behaviors that rely on existing systemic power structures to further dehumanize and limit the autonomy of a particular person or group’ (2021). Powell and Henry use technology-facilitated sexual violence to describe ‘the diverse ways in which criminal, civil or otherwise harmful sexually aggressive and harassing behaviours are being perpetrated with the aid or use of digital communications technologies’ (2017, 5). Importantly, many authors show how technology and online spaces are used to inflict harm on and exercise coercive control over current and former intimate partners and in context of domestic violence (Al-Alosi, 2017; Dragiewicz et al., 2018). The staggering negative effects that violence through technology can have on survivors are also studied. In their scoping review, Rogers et al. (2022) discuss financial impact (limited access to finances and online banking, loss of employment, etc.), mental health outcomes (depression, suicide ideation, etc.) and social impact (social isolation, safety concerns, etc.) Brown and Hagarty (2024) identify fear and distress as the words most used by youth to describe the impact of technology-facilitated abuse in relationships, while, when studying technology-facilitated sexual violence committed by stranger, Salerno-Ferrato et al. (2021) find that ‘the most commonly reported emotional reactions were annoyance, anger, disgust, and fear; the least commonly experienced emotions were lust, excitement, pride, and feeling sexy’.

Investigations into the various types of cyber violence and into how technology is used for harassment are increasing as well. Hall, Hearn and Lewis offer an in-depth exploration of upskirting, revenge pornography, online textual abuse of feminists and other forms of digital gender-sexual violations (DGSV) and conclude that ‘ICTs provide the possibility to extend patriarchal power across space and time, and DGSV puts that potentiality for patriarchal power into practice, spatially and temporally’ (2023, 178). Contributions to Holt and Bossler’s volume (2020) are dedicated to online hate speech and cyberstalking, intimate partner violence and the Internet, technology-facilitated gang violence, etc. Importantly, the editors note that social science is lagging in examining how ‘humans interact with and abuse technology’ (2020, v). Elsewhere, it is argued that the utilisation of different definitions, measurements, and conceptualisations, when discussing the use of technology in domestic and family violence, ‘hinders research, investigations, comparisons, prevention, and regulation initiatives’ (Harris and Woodlock 2022, 199). Notably, Mishra, Anh Ngoc Le, and McDowell (2003, xi) highlight the principle of intersectionality and contend that ‘technology and gender do not exist in social vacuums’ and are ‘intrinsically intertwined with other social axes’ such as race, ethnicity, class, age, etc.

Academic conferences are regularly dedicating sections and panels to issues related to women’s and LGBTIQ+ rights, digital gender-based violence and online hate speech. International and regional civil society organisations are devising global courses of action to counter harassment and abuse through technological means. For instance, the Sexual Violence Research Initiative, the Association for Progressive Communications (APC), UN Women, and the Global Partnership to End Online Abuse and Harassment presented the TFGBV Shared Research Agenda<sup>2</sup> where research priorities were set after extensive consultations with experts on a global scale in five domains – 1) Nature and prevalence and impact; 2) Responses; 3) TFGBV Prevention; 4) Populations; 5) Measures and Methodologies (SVRI 2024).

A *fil rouge* that runs through the above-mentioned volumes, and many other books and studies, is the emphasis on the acute need for more reliable and comprehensive data and for better legislation, policies, and practices to help curb the multiple manifestations of the pernicious phenomenon that is CVAWG. This is also a recurring theme in many reports and policy analyses by the civil society sector and expert opinions that prompt action from governments and technological companies.

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<sup>2</sup> Technology-facilitated gender-based violence.

For example, a 2024 report published by the European Women's Lobby (EWL) offers a state-of-the-art, comprehensive overview of CVAW – its prevalence and forms, its impact on women, and the main challenges in tackling it. In terms of policy challenges, it is crucial to emphasise the discrepancies among the policy and legislative frameworks of the EU member states (and globally), including policies to internet intermediaries, as well as the lack of consistent definitions and outdated legislation that cannot keep up with the advancement of technology (EWL 2024, 72-73). The European Institute for Gender Equality (EIGE) also contended that CVAWG does not exist in a vacuum, as it 'both stems from and sustains multiple forms of gender-based violence' (EIGE 2022, 58). Again, considering the current paper's focus on policy, we should highlight a key finding of the EIGE report – that while EU member states recognise some form of cyber violence, 'only a few member states have legal provisions specific to cyber violence and, when these exist, they tend to be gender neutral, with no reference to women and girls'. (Ibid, 59)

Statistical and survey data about CVAWG and its various types are generally scarce at national level, although we need to acknowledge that some states collect more information than others – we come back to this in the next section. Furthermore, it has been correctly pointed out that the dearth of data is made worse by inadequate or non-existent disaggregation by sex, age, disability, etc., which has been attributed to the 'the lack of consideration of the digital dimension in national statistics on violence against women and girls; the absence of statistics disaggregated by sex on the incidence of computer and cybercrimes; and the lack of official records of complaints about digital violence' (CoE 2022, 27). However, some institutions and organisations try to collect data to demonstrate CVAWG's pervasiveness. The figure below presents the findings of several such surveys and studies. While we recognise that these data were gathered using different conceptual frameworks and methodologies, we believe they could be of use to demonstrate the scope of CVAWG, the categorisations being used, as well as the need to build a more universal and harmonised framework for data collection.

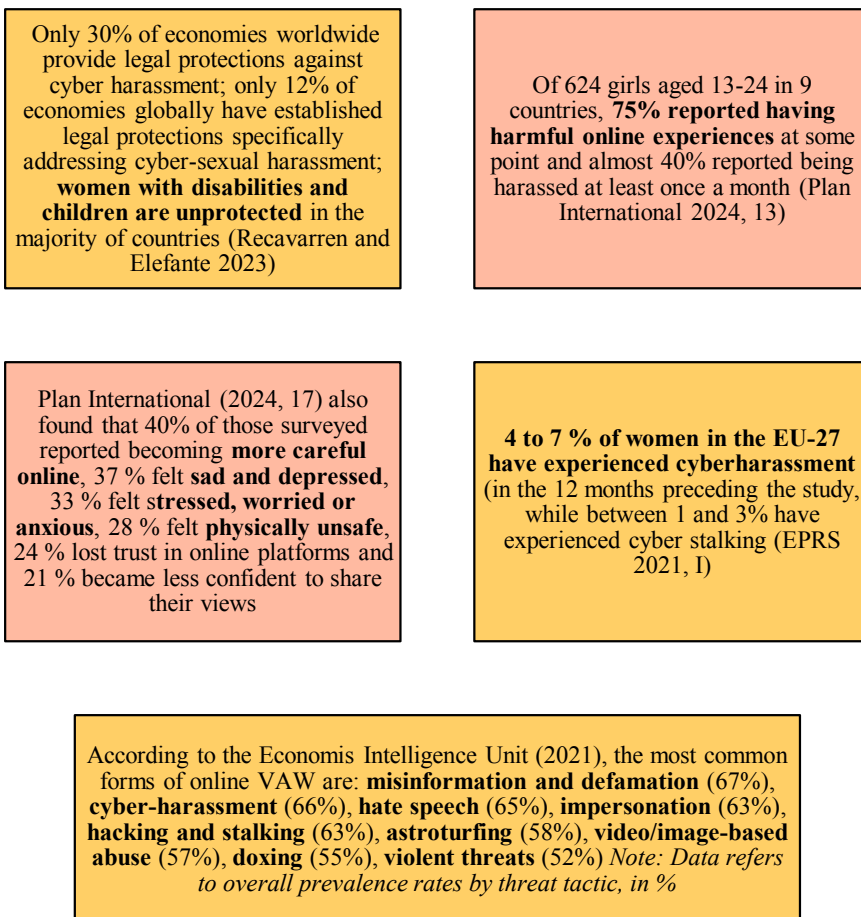
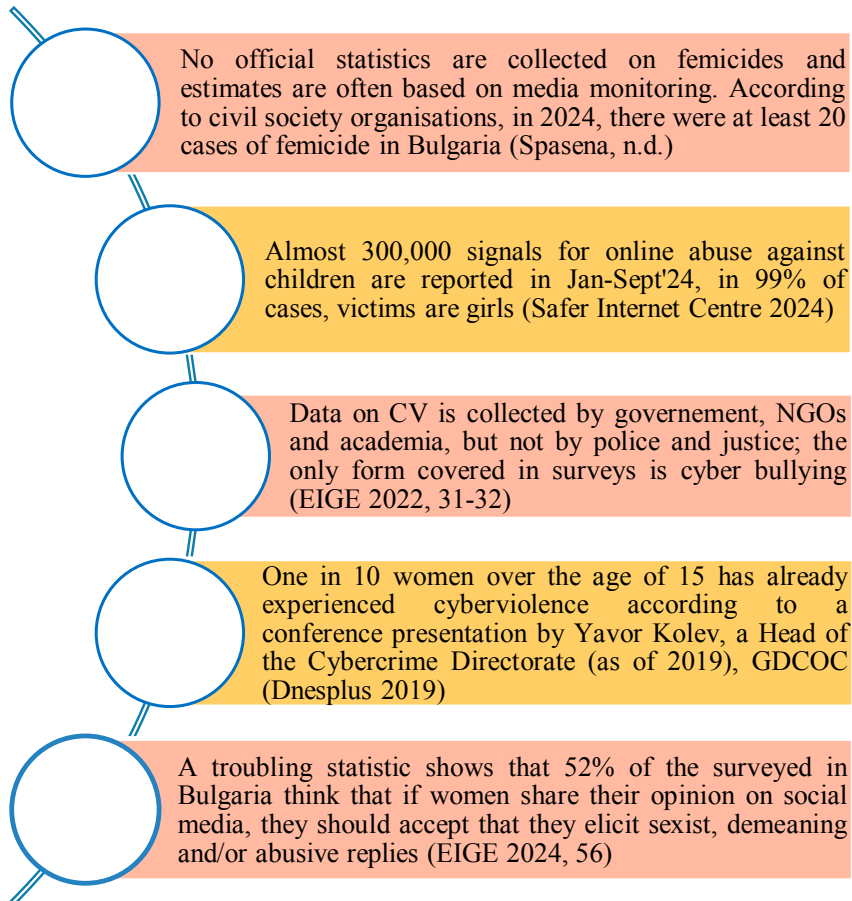


Figure 1. Statistical Data about CVAWG and its various forms

## 2. Bulgaria – Context and Key Issues

Bulgaria is not an exception when it comes to scarcity of disaggregated data on CVAWG – or on domestic violence (DV) and VAWG in general. The country has not ratified the Istanbul Convention, thus missing the opportunity to adopt necessary and advanced measures in the areas of prevention, protection, prosecution, and co-ordinated policies (dubbed the four pillars of the Convention). There is no legal definition of gender-based violence – in fact, the word and the concept of “gender” have been manipulated, misrepresented, and vilified (Slavova 2020) and the Istanbul

Convention's definition of "gender" was declared unconstitutional by the Bulgarian Constitutional Court. At the same time, VAWG and CVAWG pose a serious problem to Bulgarian society, which is supported by some existing, although limited, data:



*Figure 2. Data on VAWG and CVAWG in Bulgaria*

In terms of the legislative and regulatory framework in Bulgaria, it needs to be mentioned that there is no legislation specifically targeting CVAWG. Online grooming and online hate speech are the two forms of cyber violence considered a specific offence (EIGE 2022, 26); however, online speech is criminalised but without a specific gender component<sup>3</sup> (EPRS 2021, 104). The

<sup>3</sup> The Criminal Code mentions that hate speech can be based on "race, colour, descent, national or ethnic origin or sexual orientation" but there is no reference to sex or gender.



Bulgarian Cybercrime Directorate of the General Directorate Combating Organized Crime (GDCOC 2025) states that one of its main tasks is tackling the production, possession and distribution of pornographic material involving minors or incitement to discrimination, violence or hatred based on race, nationality or ethnicity – hence, sex or gender are not explicitly mentioned as protected characteristics.

More in-depth and wide-range actions are needed such as law enforcement and judicial bodies collecting relevant data and having surveys include more forms of CVAWG. For example, while in Bulgaria the surveys cover only cyber bullying, surveys in Spain cover cyber bullying, cyber harassment, online grooming, and sextortion and those in Poland – cyber bullying, cyber harassment, cyber violence, hate speech, non-consensual intimate image abuse and stalking (EIGE 2022, 32). A promising step has been a recent initiative by a working group under the auspices of the Ministry of Justice (consisting of over 70 experts such as practitioners, judges, investigators, prosecutors, academics, government and NGO representatives) to perform a comprehensive analysis of the Bulgarian legal framework's compliance with the EU Directive on combating violence against women and domestic violence and the necessary legislative changes in this regard (Ministry of Justice 2025). Such analysis could ensure the full transposition of the directive and help determine other obstacles to countering VAWG and CVAWG such as underreporting of incidents due to lack of trust in institutions, insufficient preparation of law enforcement and judiciaries to deal with the digital dimension of abuse, or, possibly, a certain societal reluctance to seeing behaviour occurring online as truly harmful and dangerous.

To be effective, measures and actions should also stress gender equality and counter harmful stereotypes and perceptions about the role and place of women in society. This was highlighted in a recent Communication<sup>4</sup> to the Department for the Execution of Judgements of the European Court of Human Rights by three leading Bulgarian NGOs working for women's rights and with victims of violence. The authors argue that the Bulgarian government has not undertaken enough educational measures to combat gender stereotypes identified as 'a major root cause of domestic violence in Bulgaria' (Communication from NGOs 2025, 2). In 2020, Dunja Mijatović, then Commissioner for Human Rights of the CoE, reported that the disinformation about the purpose and scope of the Istanbul Convention in the country was accompanied by the resurfacing of 'deeply rooted

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<sup>4</sup> The Communication concerns the cases of A.E. and Y and Others v. Bulgaria. The Communication is presented as part of an international monitoring mechanism that monitors how the state implements the decisions of the European Court of Human Rights.

stereotypes about gender roles in society’ (2020, 4) and urged authorities to ‘fight sexist prejudices based on the idea of inferiority of women or on stereotyped roles for women and men in society, which fuel misperceptions and social tolerance of violence against women and domestic violence...’ (2020, 22). Analysing the pervasiveness of violence against women, Kirkova (2023) argues there is a strong support for “traditional values” narratives, entrenched in the understanding that a family consists of a man and a woman who sort their issues (including violence) privately and where the man can control the woman.

### **3. The New EU Directive – Some Key Provisions and Obligations**

The EU Directive could be considered a landmark document when it comes to addressing these harmful phenomena. It aims to increase awareness about VAW and DV, improve protection of survivors and prevention in EU member states. The latter are required to adopt and implement laws, regulations, and provisions to comply with the Directive by June 14, 2027. It can be inferred that countries that have not ratified the Istanbul Convention may find it more difficult to implement the new EU Directive because in some areas they will have to start (almost) from square one and put in place comprehensive measures in a relatively short time. For instance, as they are no parties to the Istanbul Convention, they are neither required to submit detailed state reports nor are they subject to GREVIO’s baseline evaluation procedure that assesses their implementation of the treaty. Furthermore, Bulgaria has gone through seven parliamentary elections from April 2021 to October 2024, which has made it difficult to have a stable government and a Parliament to ensure the adoption of important legislative changes.

While it is not possible to highlight all the important provisions of the EU Directive, we emphasise some of them that may be especially relevant, and problematic in terms of implementation, in the case of Bulgaria:

- EU member states shall criminalise the following intentional conduct: non-consensual sharing of intimate or manipulated material (Art. 5), cyber stalking (Art. 6), cyber harassment (Art. 7), cyber incitement to violence or hatred (Art. 8), Inciting, aiding and abetting and attempt (Art. 9).<sup>5</sup>
- The Directive includes an extensive list of aggravating circumstances with respect to the criminal offences referred to in Articles 3 to 8 of the document.

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<sup>5</sup> The Directive also criminalises female genital mutilation (FGM) and forced marriage. We recognise the gravity of these offenses, but they are not included in this paper because they are not directly related to cybercrime.

This is a significant development as it covers a wide range of women at risk (including “public representative, a journalist or a human rights defender” (Art. 11 (n) and the victims of someone who is ‘abusing a recognised position of trust, authority or influence’ (Art. 11 (m)).

- The Directive strongly emphasises prevention. Art. 34 (8) specifically states that with respect to cyber offenses, ‘preventive measures include the development of digital literacy skills, including critical engagement with the digital world and critical thinking to enable users to identify and address cases of cyber violence, to seek support and to prevent its perpetration’. We consider this to be particularly relevant in Bulgaria where misinformation and disinformation campaigns on various topics (migration policies, the Istanbul Convention, COVID-19, the Russian invasion of Ukraine, etc.) appear to be effective, meaning that the ability to critically engage with the digital world is yet to be developed for a significant part of the population.
- The need for collaboration between member states and the civil society is underscored by Art. 41, which mentions as areas of cooperation ‘the provision of adequate support to victims; policymaking initiatives; information and awareness-raising campaigns; research and education programmes; training; and the monitoring and evaluation of the impact of measures to support and protect victims’.
- A key provision of the Directive provides a comprehensive framework for how member states should collect data and guarantee research on VAW and DV. Article 44 mentions the minimum categories for data disaggregation, the importance of regular surveys on all forms of VAW outlined in the Directive, as well as the need to make relevant statistics (with no personal data) publicly accessible. The availability of recent, high-quality, and reliable data on DV, CVAW, and VAW in general is crucial not only in terms of adopting effective policies but also in raising society’s understanding about the gravity of VAW in all its forms.
- The importance of eradicating gender stereotypes and enduring notions that women are inferior to men, which are certainly one of the drivers of cyber VAW, is stressed several times in the Directive’s text. Again, this is highly applicable in the Bulgarian case where, inadvertently or not, the embrace of “traditional values” or even “Christian values” sometimes entails a more stereotyped and inferior role of women in society.

Although the adoption of the EU Directive was largely praised by academics and the civil society, a few shortfalls have been identified as well. For instance, it failed to criminalise rape with a consent-based definition and introduce provisions on protecting undocumented women’s personal data from being transmitted to immigration authorities (Amnesty International 2024). The UN Special Rapporteur on violence against women and girls, its

causes and consequences<sup>6</sup> also notes that the document ‘uses terminology such as ‘sex’ and ‘gender’ in an inconsistent manner, and at times conflates the two, and also opens the door for using the pretext of ‘freedom of expression’ to limit the ability to prevent online violence against women and girls, including the non-consensual sharing of intimate images’ (United Nations 2024). However, a provision of the Directive states that after June 14, 2032, the European Commission will report on the impact of the document and, if necessary, propose extending the scope of the document and the introduction of new offences.

The role of digital platforms should also be mentioned, as they can contribute to the intensification of CVAWG through the algorithmic amplification of harmful content or inadequate reporting mechanisms. However, they can also help address cyber abuse by improving content moderation, increasing self-regulation, and introducing community standards that are stricter towards harassment, hate speech, etc. Exploring the responsibilities of social media companies to address online GBV, Suzor et al. (2019, 92) reckon that most probably states should be more upfront and active when it comes to holding intermediaries accountable for their response to online GBV and human rights promotion. Harris and Vitis (2020, 4-5) pinpoint another key issue related to how technology companies operate, noting that ‘[t]he manufacture and management of technology is absolutely male dominated and masculinised’ and that existing prejudice and inequalities are among the reasons why women still hold low-level jobs in the tech sector. This is why the implementation of the EU Directive should be concurrent with and complementing the application of other binding documents such as Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (the Digital Services Act) and Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence (the EU AI Act), which define companies’ obligations for minimising and eliminating risk and harm in the digital realm.

## **Potential Good Practices from European Countries**

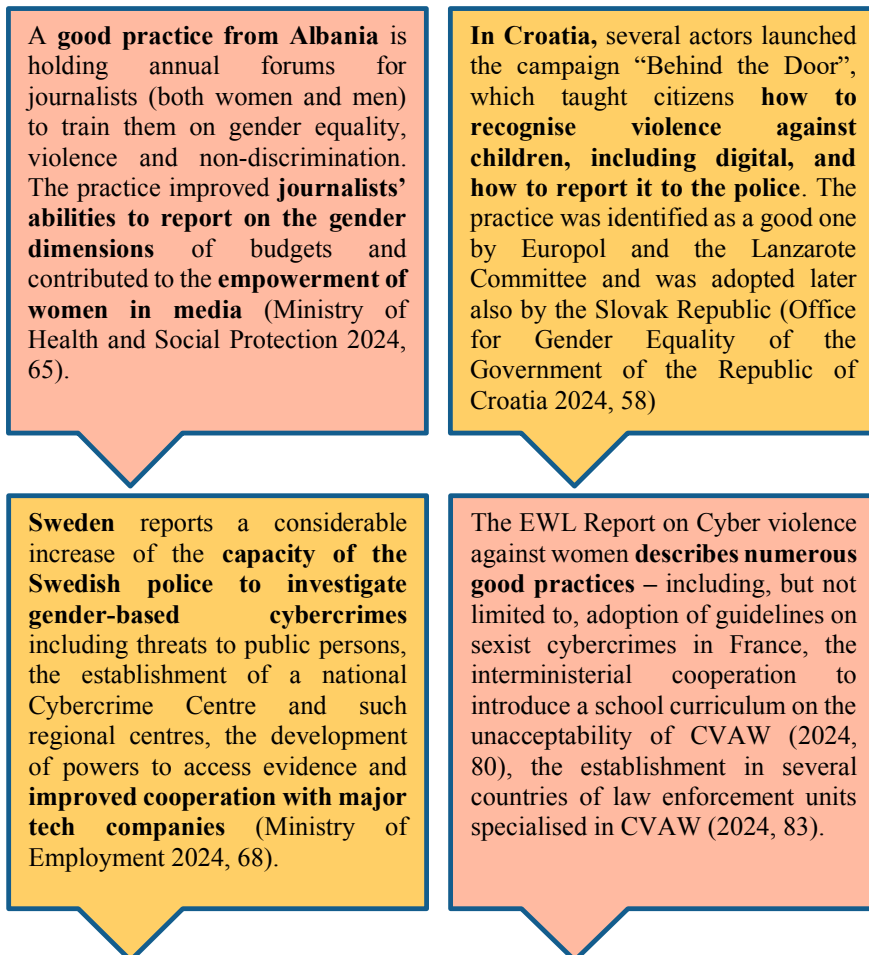
Importantly, the EU Directive acknowledges that among the member states’ obligations is to identify (through national bodies, including equality bodies) good practices on countering VAW and DV. In the next section, we

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<sup>6</sup> Holding this role as of February 28, 2025.

briefly outline several existing practices that could serve the formulation of both policy recommendations and the design of strategies and policies.

The aim of presenting these policies is to demonstrate that some countries have taken concrete actions and measures that could be replicated by decision-makers, policymakers and practitioners in Bulgaria, especially considering the specificities of the Bulgarian context (for instance, the fact that the Istanbul Convention remains unratified and the alarmingly high rates of cyberbullying against girls).



*Figure 3. Four Good Practices on VAW and CVAW*

At first consideration, transferring all these good practices to Bulgaria should not be an arduous task – as they appear to be very natural and intuitive – on the condition that political will, creativity, vision, aspiration for change, and technological and financial resources are available. What could obstruct the full and successful finalisation of some good practices is the flawed understanding of “gender” in Bulgaria, which could be corrected through systemic change and education. However, even in the current environment, state and local actors could actively look for, assess, and adapt to the local context existing practices for combatting CVAWG. In fact, such good practices need not originate in other countries – it is plausible that they already exist at the regional level, or in a particular school or media – and could be easily promoted and replicated.

It should be stressed that in Bulgaria, there have also been initiatives (mostly driven by NGOs) to measure prevalence and trends of CVAWG and increase prevention and protection, as demonstrated in Table 2. However, more should be done by state and municipal actors to counter CVAWG, especially in cooperation with the civil sector. For instance, while the 2024 National Report of the Republic of Bulgaria on the implementation of the Beijing Declaration and Platform for Action lists legislative steps and initiatives undertaken to increase cyber safety for children and youth, more should be done to counter CVAWG specifically.

## **Recommendations on Legislation and Policy**

Finally, we offer to Bulgarian legislators and policymakers several recommendations on how they can both ensure the timely adoption of the new EU Directive and accelerate meaningful efforts to combat CVAWG. These are:

### **Broader and overarching recommendations**

- Bulgaria should ratify the Istanbul Convention and fulfil its obligations stemming from the two key decisions of the European Court of Human Rights, addressed in the 2025 Communication of the three NGOs.
- The EU Directive should be transposed in national law in a well-timed and efficient manner; preliminary consultations with legal experts and experts on CVAWG and its gendered nature could speed up and streamline the process.
- The EU Directive should be implemented concurrently with and complementary to other relevant EU legislation such as the DSA or the AI Act.

- The gendered nature of GVAWG should be stressed across legislation, policies, and strategic documents, which should also evoke the need to combat systemic inequalities and biases about the role of women in society, which may underlie and fuel CVAWG.
- In collaboration with NGOs and media, governments should design and conduct public awareness campaigns that stress CVAWG's seriousness and underline that it affects victims just as severely as violence in the physical world and that it is often part of an offline-online violence continuum.
- Governments should lead the collection of good practices existing on regional level, as well as good practices from other countries related to combating CVAWG and explore whether and how such practices could be adapted on national level or in the Bulgarian context.
- Documents like the Istanbul Convention and the Directive set minimum standards and very good benchmarks for action, but this does not mean that governments should not go beyond these provisions when trying to tackle VAWG and CVAWG.

The application of these recommendations, especially if timely and well-organised, could demonstrate that there is both political will and social backing for condemning and countering all forms of VAWG. The country's political leadership would firmly position Bulgaria as a state, which embraces those values and principles that are foundational to documents like the Istanbul Convention and the EU Directive and are linked to respect for fundamental rights, including the right to freedom from violence and the right to non-discrimination. Such acts carry immense political and social significance in the present times, when we see the steady rise of illiberal actors, democratic backsliding and persistent attacks against human rights, equality, and diversity. The suggested public-awareness campaigns should not be sporadic and project-based events; they should rather be strongly integrated in a long-term strategy for countering VAWG and CVAWG through various means.

### **Recommendations for targeted measures**

- Relevant national legislation currently in force should be reviewed, as some definitions and provisions may turn out to be outdated in view of the quickly developing technologies; for instance, it could be examined whether certain criminal offences contain a cyber/digital component.
- Governments and state actors should seek consultations and collaboration with the NGO sector, media (traditional and social), victims and society as a whole, which could lead to more targeted legislative and policy changes; such projects and collaborations should also touch upon the type of data on CVAWG which these stakeholders collect (if this is the case) because this may

lead to more harmonised data collection and, ultimately, to more high-quality data.

- Both government bodies and the NGO sector should seek and encourage greater and deeper cooperation with the tech sector, including initiatives to ensure sound reporting mechanisms and efficient content moderation.
- At least at a national level, governments should conduct quantitative surveys and qualitative studies on the prevalence CVAWG, related trends, and perceptions about this type of violence (for instance, what people consider admissible in the cyber space); this is especially needed considering the particular context in Bulgaria (where the Istanbul Convention remains unratified and false and manipulative messages about its purpose and contents are widespread).
- Comprehensive protocols should be devised on how law enforcement, specialist support services, prosecutors, and judges should address CVAWG; these protocols and mechanisms should be guided by a human rights-centred and victim-centred approach that eliminates the risk of repeated victimisation.
- In collaboration with NGOs and media, state actors should determine which groups are at especially heightened risk of CVAWG due to intersecting discrimination and intersecting vulnerabilities; they should also devise special measures mitigate or eliminate such risk (collaborative initiatives could involve direct consultations with victims, surveys and studies specifically involving these groups, direct engagement with NGOs working with these groups “on the field”).

Any actions, which are consistent with these recommendations will fit seamlessly into the 4 P’s framework of the Istanbul Convention – Prevention, Protection, Prosecution and co-ordinated Policies – and the provisions of the EU Directive. Thus, they will not only contribute to Bulgaria’s fulfilment of its obligations under these two binding documents but could also create a suitable environment for going beyond their provisions by adopting even stronger and more comprehensive counter-CVAWG measures and policies. For instance, intensified and constructive collaboration among diverse actors (state actors, civil society, technological sector) could spill over to other fields and issues such as promoting digital citizenship, modernising healthcare, or making education more interactive and accessible to everyone. In addition to improving efforts to tackle CVAWG internally, the regular collection of comprehensive data could contribute to the implementation of the TFGBV Shared Research Agenda mentioned above. Such data is especially needed for smaller countries, which do not use major languages (particularly relevant to studies on cyber hate speech, cyber incitement to violence, and disinformation).



Lastly, many of the recommendations relate to how a deeper exploration and knowledge of people's values, interests, and identities could prove beneficial for policymakers. A report titled "Values and Identities – a policymaker's guide" suggests that in deeply value-laden conflicts, solutions appealing to values could be ineffective; instead, those referring to interests could be more successful (Scharbillig et al., 2021, p. 76). Questions such as to what extent the debate on the ratification of the Istanbul Convention is a value-laden conflict or whether Bulgarian society is a deeply polarised society deserve an in-depth study of their own. However, we observe that political and social discourse on the Istanbul Convention and women's and LGBTIQ+ rights, gender equality, etc. frequently evokes a juxtaposition between 'traditional' and 'liberal' (or even 'feminist') values. Possibly, a more pragmatic (or pragmatically idealist) approach should be pursued – framing the policies in a way that revolves around what should be a common interest of a civilised and fair society – the elimination of violence and the preservation of the dignity and the lives of all women and girls.

## Conclusion

The purpose of this policy paper was to outline the key objectives of the EU Directive on combating violence against women and domestic violence and how these could be translated into specific legislative and policy actions by Bulgarian policy- and decision-makers. This exploration has identified several fields and topics where further examination could illustrate the effects of CVAWG on survivors and vulnerable groups, analyse the effectiveness of tech companies' actions (or their inaction), and guide policymakers and policy analysts in finding suitable solutions:

- Further research on how technology can exacerbate or transform traditional forms of gender-based violence
- Critical study of the proposed methodologies for studying CVAWG – its forms, prevalence, and the reactions it invokes
- Deeper analysis of existing databases about CVAWG (or its different manifestations) and of the methodologies behind the data collection
- An assessment of the effectiveness and impact of initiatives such as the TFGBV Shared Research Agenda can be of great value, especially if resulting from the collaboration of the civil society sector and academia
- An analysis of how Bulgaria is implementing the binding EU documents relevant to combating CVAWG and what are the related challenges
- A comparative analysis of regional or national approaches to CVAWG would greatly assist policymakers and practitioners and facilitate the transfer and application of good practices from one country to another.

Although advances in technology often bring about new forms of harassment and abuse, it is worth noting that efforts to tackle them are also strengthening. In some countries, there are attempts to adopt focused legislative and policy responses. There also seems to be a widespread, if not universal, push to develop a deeper knowledge about the problem through collection of more data, the production of comprehensive analyses and reports, and the identification of unexplored research areas that deserve more attention.

Bulgaria should be part of regional and international efforts to address CVAWG and aligning its policies and laws with the most advanced standards in this area is an appropriate starting point. However, the success of such policies and laws is uncertain unless there is a substantial change in the way women and violence against women is perceived by society and gender equality and gender justice are embraced as guiding principles. Technological companies are the key element in the efforts to counter CVAWG – they should be more proactive and not only fulfil their existing obligations in this area but also put extra effort to prevent and penalise such violence.

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