



REPORT ON THE COMPLIANCE WITH THE EUROPEAN STANDARDS FOR PERPETRATOR PROGRAMMES

Association NAIA
Bulgaria



Contents

Introduction	2
Practice overview	3
Safety and well-being of survivors	4
Risk assessment and management	5
Programme design and delivery.....	6
Quality assurance and evaluation	8
Management	8
Recommendations	9
Safety and wellbeing of survivors.....	9
Risk assessment and management	10
Programme design and delivery.....	10



Introduction

"We work in a complex field that requires us to constantly grow, develop, and critically reflect on our practice. This approach calls for openness and a proactive pursuit of feedback to enhance our work and recognize our own effective practices.

Thank you for being pioneers in applying for the European accreditation of perpetrator programmes and for demonstrating accountability to both your practice and your clients. We deeply appreciate the opportunity to work side by side with you in setting high standards to protect victims of domestic violence through safe and effective work with perpetrators."

Alessandra Pauncz, Executive Director, WWP EN

The Association "NAIA", Bulgaria, applied for the European accreditation of perpetrator programmes in 2024 and participated in its piloting.

WWP EN conducted a comprehensive assessment of the organization's programme for male perpetrators of intimate partner violence and its compliance with the European standards for perpetrator programmes. The assessment included a review of the organization's documentation, several online meetings, and an in-person visit, and was conducted by WWP EN experts Rory Macrae and Fionnuala Collins. The application for accreditation was then reviewed by the Accreditation Committee, which carefully analyzed various aspects of the organization's practice. The Accreditation Committee was made up of Alessandra Pauncz, Executive Director of the European Network for the Work with Perpetrators of Domestic Violence; Sara Kirkpatrick, Chief Executive of Welsh Women's Aid; and Gill McKinna, Head of the Caledonian System National Team.

This report outlines the Accreditation Committee's conclusions on the organization's compliance with European standards, highlighting its good practices and areas for improvement. It also provides detailed recommendations to support the organization's ongoing efforts to deliver high-quality and safe perpetrator interventions.

We hope that together we have contributed to your organization's growth, and that the assessment experiences and recommendations in this report will serve as both inspiration and clear guidance for taking the necessary steps to fully align your work with European standards. We look forward to welcoming you as accredited members of WWP EN in the near future.



Practice overview

The Accreditation Committee finds that NAIA's programme for male perpetrators of violence against their female partners:

- a) is in full compliance with European standards.
- b) requires improvements to comply with European standards.
- c) requires significant improvements to comply with European standards.

Overview of the organisation's adherence to the European standards by relevant sections and areas:

Section of the standards	Area	Adherence to standards
Safety and wellbeing of survivors	Partner contact and support	Met
	Focusing on children	Met
	Information sharing and decision making	Partially met
Risk assessment and management	Risk assessment	Partially met
	Risk management	Met
Programme design and delivery	Target groups	Partially met
	Programme duration and structure	Partially met
	Programme approach, goals and content	Partially met
Quality assurance and evaluation	Competent staff	Met
	Evaluation	Met
Management	Organisational and management structures	Met
	Resources	Met

The Accreditation Committee was pleased to note that NAIA is a well-established organization making a significant impact in the local community and the region and upholding clear values that promote gender equality and the end of violence against women. The Committee highlighted that NAIA's perpetrator work aligns strongly with many indicators of the European standards for perpetrator programmes. It was evident that extensive efforts have been made to ensure the safety of women and children survivors while working with perpetrators, resulting in high-quality practices in the areas of survivor safety and well-being. The Committee also noted with satisfaction that NAIA is using the assessment process to further develop and improve its practices, and encouraged the organization to continuously implement these newly developed changes.

The Accreditation Committee also recognized NAIA's potential and capacity to further develop and achieve accreditation in the near future. To support this, the Committee encourages NAIA to integrate work on masculinity more systematically throughout the programme, further enhance its risk assessment practices, and incorporate skills for guiding men through the process of change while effectively managing resistance.



Safety and well-being of survivors

Programmes for perpetrators of domestic violence must prioritize the safety and well-being of victims, including both women and children. This is a key requirement of the Istanbul Convention and the Council of Europe's guidance on implementing Article 16 of the Convention.¹ Furthermore, this approach is essential to ensure that working with perpetrators does not impose additional risks on survivors and that their safety remains paramount.

Partner contact and support

NAIA has developed a robust practice of partner contact over the years, drawing on its expertise as a victim support organization alongside the development and implementation of the ASAP protocol. NAIA has established effective internal communication between professionals working with perpetrators and those working with victims. As a result, women victims receive appropriate information about the perpetrator programme, their hopes and concerns about the men's participation are addressed, and various measures are taken to ensure their safety and well-being. Partner contact has primarily been conducted in cases where the victims were already receiving some of NAIA's services.

The Accreditation Committee was pleased to note that NAIA has taken steps to proactively reach all victims, including those not initially connected to NAIA's services (e.g., new partners or victims not yet using NAIA's services). It is encouraging that the organization has developed a new protocol to guide this practice and has collaborated with other members of the Alliance for Protection Against Gender-Based Violence in Bulgaria to support this initiative.

While the Accreditation Committee welcomes these steps, it emphasizes the importance of allowing sufficient time for this newly established practice to be tested and thoroughly integrated into the organization's operations.

Focusing on children

The Accreditation Committee noted with satisfaction that NAIA has developed a comprehensive practice to ensure that children are considered and supported when working with perpetrators of domestic violence. NAIA has recently developed and implemented a Child Protection Policy specifically for its perpetrator programme. The policy ensures that all children potentially affected by violence are identified and outlines various methods for gathering information about the children, depending on which services the perpetrator, the woman, and the child are accessing. Furthermore, the policy includes tools to assess potential risks to children, covering both direct harm and harm caused by violence directed at their mother. Since this is a recent document, developed in 2023, it is important to conduct ongoing monitoring to ensure its continuous implementation and upgrades if needed.

The organisation has appointed a children's coordinator who implements various activities in the local community to raise awareness about domestic violence and its impact on children. For example, the

¹ See: [Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence](#); [Domestic and sexual violence perpetrator programmes: Article 16 of the Istanbul Convention](#); [Guidance for safe and effective perpetrator programmes](#);



coordinator provides training on this topic to other agencies and conducts psychoeducational sessions in schools with children and parents, including fathers.

The team has clearly demonstrated their understanding of domestic violence as a harm that always affects children and must be addressed when working with perpetrators. NAIA's perpetrator programme includes four sessions on the impact of violence on children and on parenting skills, which are applied if the perpetrator is a parent or if children are directly or indirectly involved in the violence. The Accreditation Committee encourages NAIA to consider offering these sessions to all perpetrators. Even if some may not be fathers, involvement in this content could have broad benefits, such as exploring their own upbringing and how it relates to their current use of violence, and supporting them in potential future parenting roles.

Information sharing and decision making

The information flow between professionals working with perpetrators and victims is clearly defined and guided by the ASAP protocol, which is continuously updated to incorporate changes in practice. Professionals working with perpetrators and victims hold regular meetings once a month throughout the programme, including during the follow-up stage. Both perpetrators and victims are informed about the cooperation, confidentiality, and exceptions to confidentiality. A consent form was recently developed as part of the preparation for accreditation. The cooperation, joint meetings, and joint decisions are thoroughly documented.

The Accreditation Committee welcomes NAIA's efforts to establish clear and transparent information-sharing processes that will enhance the safety of victims. The Committee acknowledged the organisation's ongoing efforts in this area, as well as its more recent initiatives during the accreditation preparation period. These efforts have included extensive documentation of existing good practices and the development of improved practices, such as the creation of a protocol to facilitate contact with victims and information exchange when victims are not already using NAIA's services.

The Accreditation Committee supports the steps taken and encourages the organisation to monitor and fine-tune as necessary the newly developed procedures and documentation. Furthermore, it invites the organisation to test all newly implemented changes, revise them if necessary, and continuously apply them. This will allow the Committee to assess whether the newly developed procedures are well embedded in the organisation's practice and to determine if this standard is fully met. Additionally, the Committee encourages NAIA to include a focus on the perpetrator's feelings about his partner potentially receiving support services. This should involve assessing and addressing possible service-generated risks, such as the perpetrator attempting to control or pressure his (ex)partner regarding her decision to access or engage with the support service.

Risk assessment and management

Programmes for perpetrators of domestic violence have the responsibility to continuously assess and monitor risks to women and children in order to implement measures that mitigate and manage these risks. This is a crucial element of safe and accountable practice. Furthermore, perpetrator programmes can contribute to the effective work of other institutions in the GBV and DV field, as they are often the only ones maintaining regular contact with perpetrators and frequent contact with victims. As such, they can identify risks that may go unnoticed by other agencies or those that have recently emerged.

Risk assessment

The Accreditation Committee noted that NAIA had some risk assessment procedures in place, primarily outlined in the ASAP protocol, which were enhanced during the accreditation preparation process with mentoring support from WWP EN. As a result of this process, the organisation has developed a comprehensive risk assessment procedure, which is now included in the documentation. This procedure addresses not only the risks posed by the perpetrator but also potential service-generated risks.

NAIA demonstrated good practice in the joint work between perpetrator programme facilitators and professionals working with victims to assess risks and make joint decisions in this regard. However, it remains to be seen how this process will be implemented in cases where women are not already part of NAIA's services, and where cooperation with external organisations is required.

The Accreditation Committee welcomes the steps already taken to advance the risk assessment practice and encourages NAIA to test all newly developed procedures and upgraded tools, refining them to reach their final versions.

Risk management

The Accreditation Committee was pleased to note that NAIA is a well-established organisation with a solid network of relevant institutions both in the local community and the region. NAIA has developed effective practices of collaboration with key institutions, particularly the police, and signed cooperation agreements with the Police, Court, and Prosecutor's Office in 2016.

The smooth cooperation is, on one hand, supported by the organisation's strong reputation and the ease of access to various agencies, as NAIA operates in a small community where many professionals know each other, making it easier to build professional networks. Additionally, the organisation works with a relatively small number of perpetrators each year (between 9 and 13), which may also contribute to smoother cooperation, as the work is not negatively impacted by a high caseload.

The Accreditation Committee notes that, under the given circumstances, informal cooperation pathways may still yield good results. Additionally, the Committee welcomes the recent steps taken to ensure consistent cooperation in all cases through the development of a formal protocol.

Programme design and delivery

Target groups

NAIA has developed clear eligibility criteria, drafted during the accreditation preparation process, which transformed the previous practice of accepting any perpetrator referred by the court. The eligibility procedure specifies that the program is targeted at adult men (over 18 years) who have been violent toward their female (ex) partners and children. The document further outlines additional eligibility criteria, excluding individuals who are addicted to substances, severely mentally ill, pose a danger to the life or health of professionals, do not speak Bulgarian, or have physical disabilities that prevent them from participating in the program.



The Accreditation Committee welcomes these developments but notes slight discrepancies in NAIA's documentation. Specifically, Section II of *The Programme for Working with Perpetrators of Domestic Violence* document states that the program aims to change the behavior of perpetrators, mainly men, who use violence and abuse against their partners, children, and others. This wording could imply that the program is open to female perpetrators or individuals violent toward other family members, such as parents or siblings, which contrasts with the eligibility criteria in the dedicated document. The Committee invites NAIA to harmonise existing documents for consistency and consider combining documents that cover similar content.

Programme duration and structure

NAIA provides individual work with perpetrators, reflecting the context of small, dispersed communities and a low number of clients, which makes group work less efficient. The programme consists of 29 individual sessions, adhering to the European standards (3 sessions in the intake phase, 22 sessions in the phase of intensive work, 2 sessions for closing and 2 sessions for the follow up). The stages of the programme are clearly described in different documents, while the goals of the each stage are in line with the standards.

As in other areas, the NAIA team has shown openness to necessary changes, reviewing and revising the structure of their programme to better align with European standards. They have added two follow-up sessions, extended the intake phase, and developed procedures for the programme's closing phase. The Accreditation Committee welcomes the organisation's demonstrated accountability and motivation to enhance their work, and supports the need of allowing enough time that these changes are fully implemented in practice.

Programme approach, goals and content

The Accreditation Committee was pleased to note NAIA's full dedication to promoting the safety of women and children in their work with perpetrators and their clear understanding of intimate partner violence as a gendered phenomenon. The organisation's focus on victims' safety and wellbeing, as well as the gendered nature of violence, is evident both in their documentation and in the attitudes of their professionals.

The Committee highly appreciates the effort that the organisation has put in making the content of their work with perpetrators more transparent, and drafting the document which outlines the key topics in working with men, while also acknowledging that this was done in a restricted timeframe.

The Committee encourages NAIA to further develop its methodology for working with male perpetrators by incorporating additional topics, such as a deeper focus on sexualised violence, masculinity and gender stereotypes, and the use of children in violent dynamics. Additionally, the Committee invites NAIA to clearly outline approaches that guide perpetrators from resistance toward motivation and meaningful change. The Committee also suggests that sessions on fathering and the impact of violence on children be offered to all perpetrators, not only those who are currently fathers (given that it is quite possible such men could become fathers in the future).

The Committee recognises that individual work with perpetrators allows for highly tailored interventions and that overly structuring this work could limit the programme's ability to address the unique needs of each individual. The further revisions of the programme would need to take this into the consideration.



Quality assurance and evaluation

Programs for perpetrators of domestic violence must be accountable for their practice and implement strong quality assurance mechanisms. This includes ensuring that staff possess relevant competencies, which are continuously expanded, and that the organization regularly evaluates both the process and outcomes of the programme.

Competent staff

The organisation has comprehensive procedures for the recruitment and selection of new staff. Clear onboarding procedures are in place, including an initial specialised training consisting of 120 hours focused on delivering the perpetrator programme. In this regard, NAIA's practice exceeds the European standards. New staff also receive mentoring support over a 3-month period.

Additionally, NAIA provides individual supervision to their staff every week, along with group supervision once a month. The team is highly committed to delivering quality service, and the organisation actively seeks opportunities to continuously build the competencies of its staff.

Evaluation

The Accreditation Committee highly values NAIA's practice of evaluating their programme and its outcomes, noting that in this regard, the organisation exceeds European standards.

The organisation uses the IMPACT Outcome Monitoring Toolkit since 2019 to track the outcomes of their work. Data is collected through a standardized procedure, gathering information from both perpetrators and women victims before, during, and after the programme. NAIA team has demonstrated that they use the findings from the evaluations and assessments to change and improve their practice.

Management

To achieve the desired outcomes, programmes require effective management and adequate resources. Regardless of how skilled the professionals, good the procedures, or strong the curriculum, without a solid organisational structure, the results will likely fall short of their potential.

Organisational and management structures

The Accreditation Committee noted that NAIA operates with a small team that works very closely together. The management structures are well-suited to the size of the team, facilitating effective work while also fostering innovation and continuous improvement.

The Committee observed that the gender distribution among staff is not balanced, as all the professionals are female. While acknowledging that recruiting a male professional might be a challenge in a small region where few men are engaged in helping professions, the Committee encourages the organisation to actively explore opportunities to establish gender-mixed teams.



The organization is committed to ensuring equal opportunities and working conditions for all employees, whether they are working with perpetrators or with victims.

Resources

As an NGO, NAIA consistently invests efforts in securing funding for its services. Despite the challenges, the organization has demonstrated its ability to provide continuous service and maintain adequate technical and human resources to ensure quality work with perpetrators.

Recommendations

NAIA has come a long way to reach its current level of expertise and practice. In many aspects, the work is well-established and meets or even exceeds the framework outlined in the European standards. One of NAIA's strengths is its openness to critically reflect on its own practices and its motivation to grow, resulting in significant evolution over the years. The Accreditation Committee is pleased to see the team's potential and motivation to take further steps towards fully aligning their work with European standards, ensuring safe and effective practices.

This section outlines recommendations for improving NAIA's programme for male perpetrators of violence against their female (ex)partners. The aim is to provide clear guidance not only on what needs to change but also on suggested pathways for implementing these changes. It is important to note that the listed actions are suggestions; the organisation should reflect on the most effective ways to make the necessary changes within the context in which they operate.

In some cases, suggestions for improvement are provided even in areas where all indicators of the European standards are already met. The motivation behind this approach is to fully support the organisation's growth and to highlight areas where further development is possible. This approach aligns with the spirit of the European standards and the accreditation system, which aim to encourage and support practices to achieve their fullest potential, rather than simply meeting minimum requirements.

Safety and wellbeing of survivors

Fine-tune the newly developed documentation showcasing the existing practice;

Possible actions:

- ✓ Take time to fine-tune the newly developed documentation as a collaborative effort among different team members.
- ✓ Include a focus on the perpetrator's feelings about his partner potentially receiving support services. This should involve assessing and addressing possible service-generated risks, such as the perpetrator attempting to control or pressure his (ex)partner regarding her decision to access or engage with the support service.



- ✓ Explore the possibility of connecting various documents to ensure that the overall number is reasonable, easy to find and access, and that clients are not overwhelmed with excessive paperwork. For example, consider integrating the newly developed consent form into the contract with the perpetrator/victim, or the key elements of the procedure for identifying all children victims of violence could be integrated in the Child Protection Policy.

Test and revise the newly developed procedures/protocols, and ensure their full implementation;

Possible actions:

- ✓ Test the newly developed protocol for contacting women who are not yet engaged with NAIA. Consider the possible service generated risks of making the proactive contact with these women and integrate that in the protocol.
- ✓ Use the testing experiences to upgrade the protocol if needed.

Risk assessment and management

Test and revise the newly developed procedures, protocols and tools and ensure their full implementation.

Possible actions:

- ✓ Test the newly developed risk assessment procedure and upgraded ASAP protocol, as well as the protocol of collaboration with different institutions to effectively manage risks.
- ✓ Use the testing experiences to upgrade tools, protocols or procedures and ensure their implementation in every case.

Programme design and delivery

Harmonise all documents so that they provide a consistent message;

Possible actions:

- ✓ Harmonise documents, such as *The Programme for Working with Perpetrators of Domestic Violence* and the *Eligibility Procedure*, and consider combining documents that cover similar content to improve accessibility and ease of use.

Analyse and upgrade the current content for working with men, and outline it in the comprehensive curriculum;

Possible actions:

- ✓ Create a small working group consisting of NAIA's team and external expert(s). It is important to include external, independent support in this process to ensure diverse perspectives are considered and to incorporate proven best practices in working with men.



- ✓ Analyse the content of the current practice and identify areas that should be added or revised. Based on the assessment process, it appears that the programme should incorporate a deeper focus on sexualised violence, masculinity and gender stereotypes, and the use of children in violent dynamics. Additionally, there is a need to clearly outline approaches that guide perpetrators from resistance toward motivation and meaningful change. Consider offering sessions on fathering and the impact of violence on children to all perpetrators, not just those who are currently fathers.
- ✓ If needed, provide capacity building in the areas that require improvement, to ensure the successful integration of these segments into the programme methodology.
- ✓ The working group should draft the upgraded content for working with men in a comprehensive document. The group should explore ways to ensure that the work with men remains individually tailored while covering all key aspects. One approach could be to have mandatory topics and sessions, alongside optional ones.
- ✓ Test the upgraded methodology over a 12-month period and ensure that external monitoring is in place to assess the process.
- ✓ Based on the testing, prepare the final methodology.