



Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Bulgaria

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Civil society monitoring report on the quality
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for Roma equality, inclusion, and participation
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LIST OF ABBREVIATIONS

| | |
|---------|--|
| BGN | Bulgarian Lev (currency) |
| CEICSEM | Centre for Educational Integration of Children and Students from Ethnic Minorities |
| CPD | Commission for Protection against Discrimination |
| CSO | Civil Society Organisation |
| EAFRD | European Agricultural Fund for Rural Development |
| ECRI | European Commission against Racism and Intolerance |
| EEA | European Economic Area |
| EEA FM | European Economic Area Financial Mechanism |
| ERDF | European Regional Development Fund |
| ESF+ | European Social Fund Plus |
| ESIF | European Structural and Investment Funds |
| EU SILC | EU Statistics on Income and Living Conditions |
| FRA | EU Agency for Fundamental Rights |
| HRDOP | Human Resources Development Operational Programme |
| IHRA | International Holocaust Remembrance Alliance |
| ISCED | International Standard Classification of Education |
| MEP | Member of European Parliament |
| MES | Ministry of Education and Science |
| MH | Ministry of Health |
| MLSP | Ministry of Labour and Social Policy |
| MP | Member of Parliament |
| MRDPW | Ministry of Regional Development and Public Works |
| NAMRB | National Association of Municipalities in the Republic of Bulgaria |
| NCCEII | National Council for Cooperation on Ethnic and Integration Issues, at the Council of Ministers, Bulgaria |
| NEET | Not in Education, Employment or Training (young person) |
| NGO | Non-Governmental Organisation |
| NRCP | National Roma Contact Point |
| NRIS | National Roma Integration Strategy (2012-2020) |
| NRSF | National Roma Strategic Framework (2022-2030) |
| NSEIPR | National Strategy for Equality, Inclusion, and Participation of Roma |
| NSI | National Statistical Institute |
| OSCE | Organisation for Security and Co-operation in Europe |
| RDOP | Regions in Growth Operational Programme |
| REF | Roma Education Fund |
| SESGOP | Science and Education for Smart Growth Operational Programme |
| TSA | Trust for Social Achievement |

EXECUTIVE SUMMARY

On 5 May 2022, the Council of Ministers adopted, through its Decision, the National Strategy of the Republic of Bulgaria for Equality, Inclusion, and Participation of the Roma 2022-2030 (National Roma Strategic Framework, NRSF). Despite the insistence of civil society organisations, the document is not expected to be voted on by the National Assembly – as happened with the previous strategy in 2012. This weakens the political weight of the new NRSF, indicates weakening of the political commitment, and generates practical difficulties for implementation. The new Bulgarian NRSF is a modest step forward in several directions when compared to the previous National Roma Integration Strategy 2012-2020 (NRIS):

- It contains a stronger analytical part;
- The problems of Roma women, children, and youth are partly included in the analysis and in some of the priorities. A specific chapter titled 'Empowerment of Roma Woman' is introduced (although poorly developed);
- It contains some integrated measures and better cohesion between the objectives and planned interventions, designed by different public institutions;
- There is continuity in some measures, such as health and educational mediation, as well as attempts of improvement in others (for example, social housing and social services as a whole).

At the same time, the new NRSF has significant weaknesses:

- It was prepared through a controversial and less than optimal consultative and participative process;
- The aims and measures included are predominantly general actions that have been used in the previous Strategy or are already in use;
- There are only few measures that contribute to mainstream policies enriching them with Roma related aspects;
- The NRSF includes only part of the good opportunities provided by the EU Roma Framework;
- It practically does not include the topics of combating antigypsyism and promoting Roma participation. Only nominally, a chapter on 'Equality of the Roma women' is included;
- The instruments proposed in the Council Recommendations from 12 March 2021 are only partly used.

Participation

There were significant difficulties in the process of drafting the Bulgarian NRSF and the involvement of Roma and CSOs in the process. Local organisations and field workers were not targeted and were not actively involved. Some of the national organisations have participated but are not satisfied with the quality of the consultative process. The NRSF replicates the current institutional-consultative framework without envisaging significant improvements. The NRSF calls for the active participation of the Roma in all its stages - planning, implementation, and monitoring, but the effectiveness of the proposed solutions has been widely criticised by civil society organisations.

It should be considered that the National Council for Cooperation on Ethnic and Integration Issues, and regional and municipal councils have a limited budget and human resources, which would make it difficult to implement the main policies set out in the NRSF and Action

Plan. In 2013 and 2017, almost all Roma organisations left the National Council for Cooperation on Ethnic and Integration Issues (NCCEII) pushing for its fundamental reform. Without such a reform, it would be difficult to involve Roma and pro-Roma CSOs in the NRSF implementation.

Relevance

Concerning relevance, the current NRSF seems to be more credible in comparison with the previous NSRI. There are some integrated measures and better cohesion between the objectives and planned interventions, designed by different public institutions. There is continuity in some measures.

However, there is a lack of ethnically disaggregated data in every priority and this is a significant challenge for the needs assessment and for setting proper benchmark indicators. Some institutions did not change the discourse of the language used (Ministry of Interior, Ministry of Justice, Ministry of Culture) and based on that it could be expected that nothing or too little will change in the implementation (i.e. underperformance is expected). The second significant issue is the location of findings and expected budgets. The Action Plan was set just for two years (2022-2023) because it is bounded to European funding through the social funds of the EU. The lack of political engagement and national funding is a clear sign of a lack of political will. The discussions with some public institutions show deep-rooted prejudices and stereotypes about a perceived 'inferiority of Roma culture' and stigmatisation of the Roma communities. Therefore, much more work will be needed on combating anti-Roma stereotypes and discrimination.

Expected effectiveness

The analysis of the main problems of the Roma is adequate, but not exhaustive, as some serious problems are not analysed. Some of the requirements of the European political documents are formally complied with, and coherence with the international legal documents in the field of human rights and social justice is declared. Regarding the coherence with internal strategic documents, there are certain deficits, as it takes into consideration only the 'National Development Programme: Bulgaria 2030' and a strategic document in the field of education. There are no references to the 'Partnership Agreement' for the programming period 2021-2027, or to the National Recovery and Resilience Plan. There are no definite requirements regarding the building of administrative capacity for the implementation of the NRSF. Neither the composition nor the powers of the planned Commission for Coordination of the Implementation of the NRSF have been defined. The document is defined as a "framework, all measures envisaged to achieve the objectives of the NRSF are detailed in the National Action Plan". The NRSF makes a brief assessment of possible risks to implementation but does not contain a mitigation plan to avoid and overcome them. The financial security is not specified and detailed, which is a serious risk to the implementation of the measures. The implementation indicators are basic and targets are not ambitious; the basic ones have ethnically non-aggregated indicators, which makes it difficult to monitor the implementation; and, for some of the target indicators, the values are too low. In addition, some of the values refer to the general population and not specifically to Roma.

Alignment with the EU Roma strategic framework

The analytical part of the new NRSF considers certain specific needs of Roma women, youth, and children while they are only partly covered and backed up with specific objectives and actions in the strategic part and the Action Plan. At the same time, the NRSF misses other groups such as Roma with disabilities, EU-mobile citizens, Roma LGBTQI, etc., including Roma without IDs.

The new strategic framework proposes a combination of targeted and mainstream approaches. The weaknesses of the NRSF and especially of the Action plan are that the aims and measures included are predominantly general actions that have been used in the

previous NSRI or already existed. In general, there are only a few measures that contribute to mainstream policies enriching them with Roma-related aspects.

The NRSF includes only part of the good opportunities provided by the EU Roma Framework. It practically does not include the topics of combating antigypsyism and promoting Roma participation. Only nominally, a chapter on 'Equality of the Roma Woman' is included. The instruments proposed in the Council Recommendations from 12 March 2021 are only partly used.

INTRODUCTION

National Roma strategic framework

At its regular meeting on 5 May 2022, the Council of Ministers adopted by Decision the National Strategy of the Republic of Bulgaria for Equality, Inclusion and Participation of the Roma 2022-2030 (National Roma Strategic Framework, NRSF). The document will not be voted on by the National Assembly – as happened with the previous NSRI in 2012. On one side, it indicates a significant decrease in political commitment. On another, it is difficult to engage institutions outside of the national executive power, such as municipalities, the Commission for Protection against Discrimination, the National Ombudsman, and many others, with the NRSF implementation. Last but not least, it can be easily dismissed or entirely changed by the decision of the next government.

The adopted NRSF is a new document, followed by an Action Plan, approved with the same CoM decision. It is not supposed to have additional appendices. The NRSF envisages district and municipal strategies and plans to be further developed to support its implementation.

In December 2020, the Secretariat of the National Council for Cooperation on Ethnic and Integration Issues (NCCEII) (which is also the National Contact Point) published for public consultation the first working version of the National Strategy for Equality, Inclusion and Participation of Roma. It was drafted without the participation of civil society organisations. According to the draft, the document was set to be adopted only by the Council of Ministers on the eve of the upcoming parliamentary elections in March 2021. The draft document was criticised by all organisations and experts who participated in the public consultation procedure.¹

In the following months, the process was slightly improved but far from being satisfactory for the requirements of the European Commission/Council of the European Union and Roma/pro-Roma civil society.

After the approval of the regular government of Kiril Petkov (December 2021), the preparation process of the new National Roma Strategic Framework and the Action Plan was restarted. The new Deputy Prime Minister and chair of the NCCEII Kalina Konstantinova organised an online discussion with civil society organisations in early February 2022. On 15 February 2022, she joined a discussion organised by the Amalipe Centre and the Friedrich Ebert Foundation, together with MPs from all parliamentary groups and several other institutions. At the end of March 2022, the draft NRSF and its Action Plan was published for public discussion for the third time. Except for some changes introduced in the Action Plan, the NRSF was not modified despite reiterated proposals made by the main civil society organisations involved in the process. The proposals were still not accepted by NCCEII and the government.

About this report

The report aims to evaluate the process of preparation of the new Bulgarian NRSF, the extent and nature of participation of Roma and pro-Roma civil society, and the quality of this process. The report also assesses the new NRSF and its Action Plan from the perspective of its relevance regarding the needs of the Roma in Bulgaria, expected effectiveness, and alignment with the opportunities provided by the new EU Roma Framework.

¹ <https://www.strategy.bg/PublicConsultations/View.aspx?@lang=bg-BG&Id=5708>

The report is based on field research that included:

- interviews and focus groups with main stakeholders: Roma and pro-Roma civil society (eight organisations) active at national and local level; National Roma Contact Point; representatives of six ministries/institutions with mandate to coordinate the implementation of the main NRSF priorities; local authorities from five municipalities (three urban and two rural ones);
- desk research on the main documents of the new EU Roma Framework: the EC Communication 'A Union for Equality: an EU Strategic Framework for Equality, Inclusion and Participation of Roma' and its annexes: 'Guidelines for the Planning and Implementation of National Roma Strategies' and 'Portfolio of Indicators'; the Council Recommendation on Roma equality, inclusion, and participation;
- the drafts and the approved National Strategy for Equality, Inclusion and Participation of Roma and its Action Plan;
- in addition, an online questionnaire distributed among mediators, activists, and other field workers was filled in by almost 100 respondents.

The data was analysed by the authors of every chapter listed above.

When organising the report development in 2022, the project partners stressed the principles of Roma participation and developing the capacity of Roma and pro-Roma organisations to monitor the implementation of public policies and to advocate for a transparent, effective, and efficient Roma-related policy, both at local and national levels. That is why, we have encouraged 12 organisations to take part in the preparation of the report and have made possible the opinion of dozens of local activists and field workers to be vocal. We strived to make the voices of Roma better heard through the report. Since the Roma community and movement is not homogenous in social and ethnocultural terms, the partners intend to rather coordinate these different voices and propose possible harmonies on certain key topics than to pretend they are unified into one voice only.

The authors of the report would like to thank all local activists, mediators, representatives of field workers and various institutions who took part in the research. In addition, they would like to express their gratitude to the National Contact Point on the NRSF for the cooperation.

1. PARTICIPATION

1.1. Roma participation in the NRSF preparation

Preparations for the development of the National Strategy for Roma Equality, Inclusion and Participation of Roma have been relatively difficult, due to the country's political instability and pandemic conditions. An additional difficulty was the crisis during the consultation process with Roma organisations and the NCCEII, which was abandoned by the most active organisations in 2013.² All these have led to significant difficulties in the drafting process of the NRSF.

In October 2020, the European Commission published a renewed European framework for national strategies for Roma equality, inclusion, and participation. Shortly afterwards, thematic discussion meetings on the T.E.A.M. 2 'Together We Achieve More' were launched by the NCCEII, concerning separate priorities under the National Strategy of the Republic of Bulgaria for Roma Integration 2012-2020. These meetings have been about the implementation of the previous National Roma Integration Strategy (NRIS), but they also presented the new EU Roma strategic framework until 2030.³

In December 2020, the first working draft of the NRSF was prepared and published for consultation by the NCCEII Secretariat,⁴ without the active participation of civil society organisations. The draft document was envisaged for voting only by the Council of Ministers, and not by a decision of the National Assembly, like the previous NRIS from 2012. During the public discussion, this document was sharply criticised and several changes were proposed, which led to the creation of a working group that was attended by experts from the institutional level and some of the organisations working in the field, but without political representatives. Due to the lack of political participation, some Roma organisations have refused to join. Some of them were national and well-recognised organisations, such as Amalipe Centre and the other organisations in the Roma Integration Network. A second working version of the NRSF with improvements was prepared, but the two responsible governments did not accept the updated document.

Following the inauguration of the new government, the process of preparing the NRSF and the Action Plan framework was restarted. At the beginning of February 2022, the Deputy Prime Minister and chairman of the NCCEII organised an online discussion with civil society organisations.⁵ On 15 February 2022, a discussion was organised by non-governmental organisations together with members of the Parliament from all political parties and other institutions.⁶

At the end of March 2022, the NRSF and its Action Plan were published for public discussion for the third time. Due to the lack of changes in the strategic document, the main civil society organisations involved in the process reiterated their proposals, which were not accepted.⁷ The study conducted within the Roma Civic Monitoring (RCM) Project shows that the organisations involved in the preparation process are dissatisfied with the quality of the consultations, that part of their proposals has not been taken into account, and thus

² The reason was the lack of trust in the institution and the believe that the NCCEII functioned only formally.

³ <https://nccedi.government.bg/>

⁴ <https://www.strategy.bg/PublicConsultations/View.aspx?lang=bg-BG&Id=5708>

⁵ <https://nccedi.government.bg/bg/node/434>

⁶ <https://amalipe.bg/en/high-level-forum-nsir2022/>

⁷ <https://www.strategy.bg/PublicConsultations/View.aspx?lang=bg-BG&Id=6706>

the whole process looks rather superficial, insufficiently open and participative.⁸ The study also found that local organisations and field workers were not invited or actively involved.⁹

On 5 May 2022, by an act of the Council of Ministers, the NRSF 2021-2030, the new Strategy for Equality, Inclusion and Participation of Roma was adopted, together with the National Action Plan for the period 2022-2023.¹⁰

1.2. Roma participation in the NRSF implementation, monitoring, and evaluation

The EU Roma Framework recommends using the networks formed during the participative drafting of the NRSF later in monitoring the progress and the evaluation of the implementation. In addition to monitoring and evaluation, Roma can and should play a role in implementation as partners (as civil society organisations contracted to implement measures, or by cooperating during implementation in various other ways and capacities). Roma should be recruited within the governmental bodies responsible for the coordination and implementation of the NRSF. And Roma professionals should also be part of the public institutions' teams that are involved at all levels in the implementation of the NRSF, while authorities should proactively try to hire more Roma professionals, not only in connection with the NRSF but also as mainstream professionals.

Some of these requirements are fulfilled, but we also see many shortcomings. First, the NRSF does not provide sufficient real measures for the capacity building of Roma (see point 1.5. for details). So far, Roma are not adequately represented among the staff and paid experts of the public bodies, involved in the implementation of the NRSF (in regional and local administrations and not only – according to data from an online interview with the Secretary of the NCCEII and the Head of the National Contact Point).

One of the shortcomings of the NRSF is the lack of a permanent working group established for the implementation of the NRSF, which should include nongovernmental experts, and the lack of a performance audit team formed by independent experts.¹¹

Financial support for the implementation of the activities set out in the National Action Plan is envisaged in several ways:

- Financial provisions, within the budgets of the line ministries and institutions, including targeted funds, for the implementation of the integration policy;
- Funding of measures and activities at the national and local level to bear information on the state and trends of the situation in the priority areas of the NRSF in the respective territory;
- Implementation of the municipal programmes within the frames of the usual subsidy appointed to the municipalities by the State budget
- Encourage municipalities to finance the implementation of measures and initiatives through municipal budgets at the expense of own revenues, and in partnership with NGOs;
- Financing of thematic projects under the Structural Funds Programmes and The Cohesion Fund;

⁸ Focus group with civil society organisations implemented on 27 April 2022.

⁹ Focus group with local organisations implemented on 27 April 2022.

¹⁰ <https://nccedi.government.bg/bg/node/448>

¹¹ <https://strategy.bg/FileHandler.ashx?fileId=23690>

- Financing and cofinancing of thematic projects under EU programmes, the World Bank, the United Nations, the Council of Europe, and other financial support seems substantial - but specific ways should be identified to actively fulfil Principle no. 10 of 'The Ten Common Basic Principles on Roma Inclusion' (Active Participation of the Roma).

Developed plans and programmes are needed to secure EU funding. The NRSF, as well as the plan for its implementation, has the potential to be more ambitious in considering vulnerable groups not only as users of specific services but also as service providers. The main Roma actors, active at the national level are disappointed:

"... in practice, the topic of promoting Roma participation is not included. Despite the proposal of the European Commission to be not only horizontal priorities, but also specific chapters, and, although until recently Roma organisations offered specific texts for these chapters, they were not approved. Only nominally, a chapter on 'Equality of the Roma Women' is included: the chapter itself does not contain specific goals and activities, despite the many suggestions made." (statement of Amalipe Centre for Interethnic Dialogue and Tolerance)¹²

So, we could conclude that the requirements in the Planning Guidelines, proposed by the European Commission to promote Roma participation, have been only partially transposed (statement of Roma organisations).¹³

1.3. System of policy consultation with civil society and stakeholders

The NRSF replicates the current institutional-consultative framework without envisaging significant improvements. It calls for the active participation of the Roma in all its stages – planning, implementation, and monitoring. It recommends the establishment of municipal and regional councils on ethnic and integration issues with the participation of all stakeholders. These already exist in connection with the implementation of the previous NRIS and the municipal plans for it, but their effectiveness has been widely criticised by civil society organisations, which believe that these bodies function only formally. It is planned to send guidelines for regional and local planning, which emphasise the need to include Roma in the implementation of the NRSF. Such guidelines were sent as early as June 2021, and regional strategies and municipal plans for the implementation of the NRSF are currently being developed by regional councils and by municipalities. The working groups include civil servants and NGOs active at the regional and municipal levels. It is envisaged that Roma civil society organisations will be in close dialogue and cooperation with the ministries and agencies responsible for implementation, as well as with the main coordinator of the NRSF, namely the National Council for Cooperation on Ethnic and Integration Issues.

It should be considered that the National Council for Cooperation on Ethnic and Integration Issues, and regional and municipal councils have limited financial and human resources, which would make it difficult to coordinate the implementation of the main policies set out in the Strategy and Action Plan. In 2013, most of the Roma organisations active at the national level (such as Amalipe, Integro, and others) left the NCCEII, pushing for its fundamental reform. In 2017, the other national Roma NGOs still members of the National Council ceased their membership because the ultranationalist leader of the National Front for the Salvation of Bulgaria had been appointed as its chair. In the following years, no further reforms were introduced as pointed out by the 2017 RCM Report. On 8 April 2022,

¹² https://amalipe.bg/nacionalna-strategia_propusnati-vazmozhnosti/

¹³ <https://www.bta.bg/bg/news/248793>

the Deputy Prime Minister and chair of the NCCEII, Konstantinova, undertook to initiate changes in the council in close partnership with civil society organisations.¹⁴

1.4. Empowerment of Roma communities at the local level

The participation of Roma in policymaking at the local, national, and European levels is a necessary condition for overcoming exclusion.

The NRSF, from the very beginning, gives hope for the empowerment of Roma at the local level. For example, in the 'Assessment of the Situation – Conclusions': among the "Reasons for unsolved problems" are "Difficulties in terms of representation" and in particular "Lack of Roma participation in the formulation policies and decision-making and lack of civic engagement" and "Empowering the Roma woman, strengthening her ability to make strategic choices for her future".¹⁵

Roma participation is reflected in one of the 'Guiding Principles': Involvement of persons from marginalised groups in the activities for changing the conditions and way of life with a gradual increase in their involvement to the full coverage of all residents in the respective settlement; as well as in 'General Basic Principles for Roma Inclusion', such as: "1) Involvement of regional and local authorities; 2) Participation of civil society; 3) Active participation of the Roma".

Specifically, the 'Monitoring, Evaluation and Control System' section includes the following provisions: in the district administrations, assignment of certain functions to directorates, departments, units, or individual experts responsible for the implementation of the Roma inclusion policy. As in each district administration, at least one employee should be appointed, whose main functions should be related to inclusive policy (the regional governors have regional councils for cooperation on ethnic and integration issues).

For coordination with the structures of civil society, consultative structures are provided - although too general - and mechanisms for the participation of the civil society to the respective ministries, the regional governors, and the local authorities. The active participation of the Roma and all stakeholders at all stages (planning, implementation, monitoring, evaluation, and review) of the policy is also mentioned. Municipalities can establish municipal councils for cooperation on ethnic and integration issues; however, this is not always happening. In addition, the delegation of activities for the inclusion and participation of Roma to civil society organisations at the municipal level is recommended.

The recommendation for the appointment of municipal experts on ethnic and integration issues, "where necessary", is also rather vague. However, this rarely happens and municipalities are reluctant to appoint such experts, although this is possible and recommended. We could presume that such experts would be hired only there where mayors have particular interests.

We do not see any concrete measures envisaged in the National Action Plan like the obligation of the Municipal Council to adopt a municipal plan for equality, inclusion, and participation of Roma. This is also the opinion of the leaders of Roma NGOs, active at the local and regional levels, expressed during the online focus-group (April 2022) dedicated to the topic.

We can conclude that the recommendations for promoting Roma participation published by the European Commission have not been sufficiently complied with and implemented, and this conclusion for the local level is particularly clear.

¹⁴ <https://www.bta.bg/bg/news/248793>

¹⁵ https://amalipe.bg/nacionalna-strategia_propusnati-vazmozhnosti/

1.5. Capacity-building of Roma civil society

What we would like to see in the NRSF, according to the EU requirements, are open opportunities for the empowerment of Roma communities at the local level;

“So as to create the preconditions for community engagement and community actions aimed explicitly at achieving social and political change. The mobilisation of communities should be seen as a targeted inclusive process involving Roma, local authorities, and organisations; that Roma are represented in their full diversity (including local citizens and foreigners, marginalised and integrated people, women, children, and young people) in policymaking and consultation processes...”¹⁶

What we see in the NRSF is not satisfactory. For instance, the use of EU and national funds to regularly support capacity building, in particular for civil society pro-Roma organisations operating at the local level, it is not guaranteed. Specific ways should be identified to actively implement Principle no. 10 adopted by the Council of the European Union: ‘Active Participation of the Roma’. The NRSF, as well as the Action Plan for its implementation, has the potential to be more ambitious in considering vulnerable groups as beneficiaries of specific services or assistance and to direct the focus to the empowerment of representatives of these groups, so they could be users and intermediaries, as well as providers of services.

These are also the conclusions, having in mind some specific fields, of several respected organisations, such as the ‘Trust for Social Achievements’ (TSA): “In sync with the 10th of the general basic principles for Roma inclusion adopted by the Council of the European Union (‘Active Participation of the Roma’), it is necessary to look for mechanisms to increase the number of medical and pedagogical staff from the minority groups. It is important to use the full potential of the communities themselves to achieve changing of attitudes, both among the majority and among these communities, and contribute to achieving common goal no. 3 (statement of TSA).¹⁷

In the National Plan, we find only the implementation of the project ‘Improving Coordination and Dialogue between the Police and the Roma Society’, which can only be tentatively accepted as a tool for building the capacity of the Roma civil society. We should insist for many well-designed projects for Roma society to be included in the National Plan.

¹⁶ *Working with Roma: Participation and Empowerment of Local Communities*, European Union Agency for Fundamental Rights, 2018

¹⁷

<https://socialachievement.org/web/files/richeditor/header/Statement%20Roma%20Strategy%20April%202022.pdf>

2. RELEVANCE

2.1. Fighting antigypsyism and discrimination

Already in 2009, Bulgaria transposed the provisions of the Council Framework Decision 2008/913/JHA on combating racism and xenophobia, and articles 162 and 163 of the Criminal Code address the hate speech and hate crimes based on race, nationality, or ethnic origin. It complements the antidiscrimination legislation enacted in 2004 with the setup of the Commission on Protection against Discrimination (CPD). However, the Roma people are amongst the main targets of hate speech in Bulgaria, as indicated by a series of surveys conducted by the Open Society Institute – Sofia;¹⁸ since 2012, the social prejudices towards Roma people have been significantly increasing.¹⁹ In its monitoring reports on racism and intolerance, the Council of Europe calls for effective prosecutions and punishment and makes some recommendations on the existing legal gaps.²⁰

The official overall monitoring report on the previous NRIS 2012-2020 concludes that the rule of law and non-discrimination were the weakest segments in the state policy implementation: "Already the definitions of the goals, some objectives, as well as the administrative reports on their implementation, deepen the discrimination, instead of overcoming it".²¹ As it was also underlined by an independent civil society monitoring report, the most striking and indicative evidence for the lack of political will was the fact that measures against hate speech and hate crimes expected to be embedded into the NRSF were not included, and not in the National Action Plan either; thus measures to address these issues will not be implemented, reported, or monitored.²²

The current NRSF identifies the challenges related to antigypsyism and discrimination correctly. The preamble pointed the 1st, 2nd, 3rd, 4th, 5th, 7th, and 10th of the UN millennial goals for 2030 as being relevant to the NRSF. The recommendations of the European Commission, the Council of Europe, and OSCE, as well as the resolutions of the European Parliament and survey data of the FRA are exhaustively listed and considered. The non-legally binding working definition of antigypsyism/anti-Roma discrimination set by the International Holocaust Remembrance Alliance (IHRA)²³ in 2020 was explicitly quoted as a proper standard for further policymaking in Bulgaria. At the same time, the majority of Roma NGOs consider that the antigypsyism and antidiscrimination solutions and activities do not find their place in the NRSF. The proposal of many NGOs to have a specific antigypsyism chapter was not taken into account. Hate speech and hate crimes are also

¹⁸ Hate speech reports 2014, 2016, 2018. Source: <http://OSIS.BG>

¹⁹ *Civil Society Monitoring Report on Implementation of the National Roma Integration Strategy in Bulgaria*, (2020), p. 13. Available at: <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-3-bulgaria-2019-eprint-fin.pdf>

²⁰ <https://www.coe.int/en/web/european-commission-against-racism-and-intolerance/bulgaria>

²¹ Pamporov, A., E. Markova, G. Yordanova. (2020). Цялостен доклад за оценка на интеграционните политики към ромите в България в периода 2012–2019 г., с включени препоръки по целевите направления на публичните политики, в т.ч. вкл. анти-дискриминация, равнопоставеност на половете и взаимодействие с гражданското общество [Overall Report for the assessment of integrational policies towards Roma in Bulgaria in the period 2012 – 2019 with recommendations towards sectoral directions of public policies, including antidiscrimination, gender equality and interaction with civil society]. Available at: [https://nccedi.government.bg/sites/default/files/2021-01/Final Assessment Report Roma Strategy 2020 Final.pdf](https://nccedi.government.bg/sites/default/files/2021-01/Final%20Assessment%20Report%20Roma%20Strategy%202020%20Final.pdf).

²² Kolev, D., A. Pamporov, T. Krumova. (2021). *Monitoring the Implementation of the National Roma Integration Strategy*. Available at: [https://amalipe.bg/wp-content/uploads/2022/03/Monitoring the Implementation of the National Roma Integration Strategy WEB ENG.pdf](https://amalipe.bg/wp-content/uploads/2022/03/Monitoring%20the%20Implementation%20of%20the%20National%20Roma%20Integration%20Strategy%20WEB%20ENG.pdf)

²³ Available at: <https://www.holocaustremembrance.com/resources/working-definitions-charters/working-definition-antigypsyism-anti-roma-discrimination>

largely missing, segregation is addressed only partially, targets are not matched with measures to ensure progress, etc. In addition, the NRSF uses the term 'anti-Roma attitudes' instead of 'anti-Roma discrimination'.²⁴

The NRSF embodies this issue within 'Priority 5. Rule of Law and Antidiscrimination'. The operational goal is defined as: "Guaranteeing the rights of citizens, with an emphasis on women and children, protection of public order, prevention, and counteraction to the manifestations of intolerance and hate speech". However, there is a risk that the NRSF will repeat the biased implementation pattern of the NRSI. The NRSF accommodates the following item "Improvement of the measures for effective criminal prosecution in case of hate speech and hate crimes" (p. 33) but there are no legislative measures described further, nor included in the Action Plan (i.e. all the recommendations and issues identified in the preamble are not further addressed in the document). The concept of "antigypsyism" appears only in the title of an item on the 'Identification, Prevention, and Protection of Hate Crime Victims' but no measures are envisaged. It is a worrying fact that the discriminative discourse and prejudices towards Roma appear exactly in the antidiscrimination measures. For example, in the Action Plan of the NRSF, under the 'Capacity Building of the Law Enforcement Agencies to Combat Ethnic-Based Discrimination, Violence and Hatred' (Aim no. 3), there are programmes and corresponding indicators listed concerning convicted criminals, which is a clear reference to the criminal background of the Roma communities. Starting this chapter with criminals understandable raises frustration and opposition among the Roma and pro-Roma civil organisations, which then underestimate some well-designed measures such as the "capacity building of police officers working in a multiethnic environment, including Roma communities and preventing the abuse of power by police officers".

There is no unified institutional statistical source on hate crimes and antigypsyism in Bulgaria. For relevant data, the NRSF uses self-reported figures from a discrimination perception survey by the NSI. It is not well justified why the NRSF considers only the NSI as a reliable data operator in Bulgaria. There are some other reliable and possible institutional sources such as the Ministry of Interior (for example, regarding hate crime cases and police investigations), the Chief Prosecutors' Office (regarding the number of hate crime proceedings and the proportion of Roma-based cases), the Ministry of Justice (the proportion of Roma in court procedures and in detention places), Antidiscrimination Commission (submitted cases), which need to be considered. A weak point in the NRSF is that there are no plans for collecting additional Roma-sensitive statistics on anti-discrimination.

With regards to the anti-discrimination issue, the NRSF reflects the diversity only in a broad sense: as heterogeneity of Roma communities and diversity training sessions, without specific focus on Roma children, women, young people, older Roma or those with disabilities, EU-mobile citizens, non-EU nationals, and stateless Roma. The concept of 'gender' appears only in gender-based violence measures and antihuman trafficking measures as a mainstream policy but not tailored to the Roma specifics.

Most of the strategic objectives defined by the NRSF are relevant to the identified challenges, and international and civic recommendations, with regard to the discrimination. However, in many cases, there is no coherence between the objective and the measures (as the upper example – the capacity building objective starts with a victimising discourse). There are no precisely targeted measures for the prevention of hate speech and crimes, including no measures targeting the media or high-profile politicians.

²⁴ The term was broadly discussed with most of the Roma organisations, sociologists, and linguists. In Bulgarian, 'antigypsyism' sounds pejorative and is perceived as discriminative itself. That is why during an open meeting of the NCCEII, it was agreed that it will be translated as 'anti-Roma attitudes'. It is explained in Footnote no. 34 on page 17 of the NRSF. Nevertheless, the majority of NGOs use 'anti-Roma discrimination' since it is stronger than 'attitudes'.

There are no proper measures for the prevention of antigypsyism. The institutional discourse is very broad and focused on tolerance and diversity in general. The NRSF does not set out a clear roadmap for achieving these priorities and does not allocate specific tasks among the large number of stakeholders at the local and national levels. In other words, the NRSF describes the current issues and legislation gaps but fails to provide an accurate policy answer with relevant measures in the National Action Plan.

2.2. Education

Education was the most developed policy area in Bulgaria both during the decade of Roma inclusion (2005-2015) and the previous NRIS 2012-2020. The joint effort public institutions and the civil society brought significant legislative improvements promoting inclusive education concerning early childhood educational enrolment and prevention of early school leaving. Since 2017, the educational mediator position was introduced to support children living in vulnerable local communities. As a result, there are more than 1,000 educational mediators in 2021. The Covid19 pandemic and related school lockdowns endangered the education of children from households living in poverty, with limited access to Internet and online learning. A recent survey, representative of both the segregated communities, as well as the people who declare themselves as having a Roma identity, showed that there is a significant advancement in the education of Roma children during the last decade.²⁵ However, both the official monitoring report on the implementation of the NRIS²⁶ and the informal civil monitoring²⁷ emphasize that the measures targeting educational segregation, school enrollment of children living in poverty, Romani language and culture classes, as well as combating teachers' anti-Roma prejudices need further efforts. A study carried out by the Amalipe Centre, and the Ministry of Education shows that nearly 930 general education schools and 150 VET gymnasiums are with a concentration of students from vulnerable groups.²⁸ These represent almost half of the general schools and one-third of the VET gymnasiums.²⁹

These issues are taken into consideration from a macro, meso and micro point of views, and therefore the interventions are envisaged as national, municipal, and school measures, and are targeting a multiple variety of stakeholders: teachers, non-pedagogical staff, parents, and children. The NRSF takes into account the most recent and detailed data from various sources: the European Union Agency for Fundamental Rights (FRA), the World Bank, the Institute of Philosophy and Sociology of the Bulgarian Academy of Sciences, along with current policy research of the civil society, for example: 'Educational Achievements of Roma Communities in Bulgaria', commissioned by the TSA and conducted by Global Metrics Ltd. (2019), and the 'Early Childhood in Roma Communities in Bulgaria' (2019) prepared by the Open Society Institute – Sofia.

However, when speaking about planned interventions, the NRSF is not convincing enough. The measures towards desegregation are delegated to the Centre for Educational Integration of Children and Students from Ethnic Minorities. It is an independent structure of the Ministry of Education, which is in charge of raising and allocating funds between schools and kindergartens for the implementation of educational integration policies

²⁵ Angelova, R., M. Dimitrova, G. Yordanova, A. Pamporov, V. Lyubomirova, M. Terziiska. (2020). *National Survey on Roma Educational Attainment and Employmen*. Sofia: TSA/Global metrix. Available at: https://socialachievement.org/web/files/richeditor/dokumenti/REPORT_TSA_ENG.pdf

²⁶ Pamporov, Markova, Yordanova 2020, op. cit.

²⁷ Kolev, Pamporov. Krumova, 2021, op. cit.

²⁸ https://amalipe.bg/wp-content/uploads/2021/03/D2.1_School-segregation-maps-in-Bulgaria_BGversion.pdf

²⁹ The term 'schools with concentration of vulnerable students' is used by the Bulgarian Ministry of Education for schools where more than 20% of the students come from families with low educational status. In most of the cases, these are village schools. 180 general schools and 150 VET gymnasiums could be defined as segregated: they are situated in towns and cities with more than one school.

without having the functions to define the policies. The planned interventions are set as public procurements, i.e., only the winners will be able to 'benefit', but it is not a mainstream support offered to all schools. There is a need for legislative changes on the one hand and a change of the district principle of general education, on the other hand, to combat segregation at macro and meso levels, which is missing in the current Action Plan.

The National Action Plan proposes activities that are modest and without significant added value: most of them are implemented at present. There are no new measures included in the plan, although some of the previous ones failed to prove their effectiveness and positive impact. As a matter of fact, the NRSF contains country-wide indicators for monitoring, which are not ethnically disaggregated, which would make the actual progress difficult to assess. Such an example is the indicator 'relative share of young people (aged 20-24) with at least secondary education', as well as 'early leavers from education and training (relative share of people aged 18-24 who have completed at most primary education)' and 'non-participants in education and training, of the same age population'. In addition, there are inconsistencies in terms of relevance between measures and indicators in the NRSF Action Plan, some of which do not meet the objectives for which they are planned and will not lead to the implementation of the latter. An example of this can be found in Measure 4.1 'Supporting Municipalities in the Implementation of Activities for Educational Desegregation and Prevention of Secondary Segregation by Providing Free Tools and Materials' (among others). In terms of relevance, it is also noteworthy that Objective 3. 'Improving the Quality of Education in Kindergartens and Schools with a Concentration of Children and Students from Vulnerable Groups, including Roma' lacks qualitative indicators for measuring the improvement of said quality of education.

2.3. Employment

The surveys on Roma employment in Bulgaria show a seasonal pattern with higher employment in the summer but extreme unemployment rates during the winter. This trend is strongly correlated with relatively low levels of education and therefore employment in specific sectors with a higher level of temporary seasonal jobs, such as forestry and agriculture, and construction works,³⁰ which was additionally boosted by the cyclic patterns of trans border seasonal employment, after the accession to the EU.³¹ There are also very high levels of regional, rural/urban, age and gender-based disparities.³²

Together with education, employment was another very intensive field of policy measures in the previous NRIS. The administrative monitoring reports claimed a decrease in the number of registered Roma in the labour offices, which was explained by the effectiveness of the implemented programmes and measures, as well as by the general economic development of the country. However, there is a lack of statistical evidence and reliable data on causality – i.e. there is no assessment of the total population at risk, no data on the planned and actual coverage; there is no reflection on the fact that, as a result of discrimination, many local communities refuse to identify themselves as Roma in the local labour offices; there is no reflection on seasonal employment volatility related to cross-border labour migration; there is no reflection on the increase of employment in the grey economy. The fact that the highest levels of employment are achieved only temporarily through programmes and measures for subsidised employment, which turns out to be an unsustainable practice, is not considered a problem. The non-implementation of measures

³⁰ Pamporov, A (2014). *The Cyclic Employment of Roma People: Reasons and Social Consequences*. In: *Demographic Situation and Development of Bulgaria*, pp. 351-359 (in Bulgarian, summary in English).

³¹ Vlase, I., A.M. Preoteasa (2012). *Roma Migrants from Bulgaria and Romania. Migration Patterns and Integration in Italy and Spain 2011*. In: *Roma from Romania, Bulgaria, Italy and Spain between Social Inclusion and Migration*. Bucharest: Soros Foundation Romania, pp. 65-87.

³² Elenkova, R. 2019. *Employment*. In: *Civil Society Monitoring Report on Implementation of the National Roma Integration Strategy Assessing the Progress in Four Key Policy Areas of the Strategy*. Available at: <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-2-bulgaria-2018-eprint-fin.pdf>

to promote entrepreneurship is explained by the “lack of motivation”, when in fact there is no real analysis of the mechanism that is embedded in the implementation,³³ especially since the entrepreneurship among Roma people in Bulgaria is higher in comparison with the Bulgarians,³⁴ and has been increasing in the past ten years.³⁵

The NRSF is a continuation of the NRIS, since the operational objectives repeat the operational objectives of the previous period. The monitoring and evaluation risks derive from the fact that all the measures are mainstreamed, with a poor reflection of the self-identity issues, which jeopardises the correct evaluations of efficiency, effectiveness, and impact. The advantage of the employment measures is that the diversity of the inactive and unemployed people is broadly addressed and there are targeted interventions for women, NEET youth, and elders. However, there are several important issues, which are not addressed: improving the labour conditions and prevention of local and transborder exploitation; combating the grey economy and improving labour contracts in agriculture, forestry, and construction works; labour integration of the cyclic transborder migrants at the local level (i.e. in the country of origin).

The local labour offices are the only institutions in Bulgaria that are allowed to collect ethnically disaggregated data due to the specifics of the targeted integration and inclusion measures. However, the experts are aware that the number and proportion of Roma in the voluntary rosters are underreported because of the fear of discrimination. Therefore, all the employment measures in the NRSF are mainstreamed. However, the diversity addressing NEETs, long-term unemployed elders, and young mothers with no job experience is designed with the concern that the proportion of Roma amongst other people at risk is several times higher than the proportion of Roma in the total country’s population.

Most of the measures are already set in the Human Resources Development Operational Programme 2021-2027 and are included as such in the National Action Plan; and some measures are expected to be implemented through the Recovery and Sustainability Mechanism 2021-2024.

2.4. Healthcare

After the elimination of the universal health care coverage in 1998, and despite being declared a *de jure* equal access, *de facto* it is extremely easy to drop out of the health insurance system. If no health insurance contributions are paid for three non consecutive months over a period of 36 months, then the person is considered not insured. It is a very dynamic process and therefore the figures about the people without health insurance vary broadly and are disputable. According to the most recent assessment by the Ministry of Finance, there were approximately 849,600 people without health insurance at the end of 2020, and this number increased during the Covid19 pandemic with about 15%.³⁶ The FRA survey in 2011 showed that Roma people in Bulgaria are the most vulnerable in that respect in Europe and around 58% are non-insured. A recent study of *Médecins du Monde* (‘Doctors of the World’) in 2020 validates this outcome, showing that about 37% of the population living in the segregated neighbourhood Nadezhda does not have health insurance, which means about 60% of the adults³⁷ (since children and elders above 70 are health-insured by the state). Being uninsured means that in a case of acute infection or a chronic disease, one should pay all the expenses privately or should pay as a lump sum

³³ Pamporov, A., E. Markova, G. Yordanova. 2020. op. cit.

³⁴ Pamporov, A. (2010) *The Employment of Roma, Turks, and Bulgarians. A Comparative Report Based on the Outcome of the Multipurpose Household Survey 2007*. In: Michael Stewart & Merton Rovid (Eds.) *Multi-Disciplinary Approaches to Romany Studies*. Budapest: CEU press, pp. 131-154.

³⁵ Angelova, R., M. Dimitrova, et al. 2020. op. cit.

³⁶ Information available at: <https://www.minfin.bg/bg/wreply/11448>

³⁷ Pamporov, A. (2021). *Nadejda Snapshot of the Health Status and Living Conditions*.

the insurance installments for the past 36 months. So, despite being the second most important priority with 39 measures within the previous strategic period, health care interventions aiming at uninsured Roma generally failed, since it is a systematic problem of the country and not an ethnic issue.

Another systematic problem in Bulgaria is the shrinking of the medical personnel, different from medical doctors: nurses, midwives, and paramedics. The OECD has classified Bulgaria as one of the countries with the highest disproportion between medical doctors and nurses, and is calculated to be second among the OECD countries with the lowest density of nurses,³⁸ and the regional disparities of medical doctors. There are generally three regions (NUTS3) with a rather good access and ratio of health care workers (Sofia City, Plovdiv, and Varna), three regions with a sufficient number of health care workers (Burgas, Pleven, and Stara Zagora) and the other 22 regions rather suffer in some medical field. These systematic problems are the main reasons for the worst access of Roma people to health care services since many households are living in poverty and cannot rely on private payments and private hospitals. Over the past 20 years, the public bodies supported the establishment of a network of health mediators aiming at improving the access to health care for Roma people. In 2019, there were 245 health care mediators.³⁹ A survey shows they were very effective in combating the Covid19 consequences in some segregated quarters during lockdowns.⁴⁰ However, health care mediation is not medical care but merely a social service in the health care system and therefore, there are several unsolved issues as listed below:

- There are 31 Maternal and Child Health Centres (MHCs), established by the Ministry of Health to cover the needs of vulnerable groups and especially of uninsured pregnant women, who have the right to access one examination for the entire pregnancy period. The MHCs are rather non-effectively operating and their activities are not set as indicators in the NRSF.⁴¹ At the same time, the Ministry of Health justifies its refusal to expand the package of examinations for uninsured pregnant women precisely because of the formal existence of such centres at the regional level.
- *De jure*, there is one guaranteed examination and a package of laboratory tests for any uninsured pregnant woman, regulated by Ordinance 26 of the Ministry of Health.⁴² However, a significant proportion of the OG specialists and OG clinics refuse to apply the ordinance, since it requires a considerable administrative procedure to be applied and tax check-ups; for the latter there is a delay of six months up to a year before the reimbursement of the expenses. Thus, pregnant women from the most socially vulnerable groups are deprived of minimal access to prevention, with all the consequences that come with it: birth of premature babies, children with disabilities, and high maternal and infant mortality rates.

³⁸ OECD (2019), *State of Health in the EU – Bulgaria – Country Health Profile*, p. 12.

³⁹ Pamporov, A., Iliev, G. (2019). *Impact of Healthcare Policies on Roma*, in Roma Civil Monitor (2019), *Civil Society Monitoring Report on Implementation of the National Roma Integration Strategy in Bulgaria: Assessing the Progress in Four Key Policy Areas of the Strategy*: Available at: <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-2-bulgaria-2018-eprint-fin.pdf>, p. 44.

⁴⁰ OSI (2021), *Covid19 in Roma Quarters in Bulgaria*. Available at: https://osis.bg/wp-content/uploads/2021/04/Covid_Roma_Apr_2021.pdf

⁴¹ LARGO (2017). *Civil Monitoring on the National Programme 'Mother and Child Health Care' 2014-2020*. Available at: <https://venellin.files.wordpress.com/2021/04/report-monitoring-nppmdz-17.pdf>

⁴² Grigorova, V., V. Stoychev. (2015). *Predispositions towards Ordinance 26 of the Ministry of Health*. [in Bulgarian]. Available at: https://wp.flgr.bg/wp-content/uploads/2016/05/LARGO_Naredba-26.pdf

- Declining immunisation coverage with vaccines from the mandatory immunisation calendar,⁴³ as well as difficulties in implementing the recommended immunisation calendar (rotavirus and cervical vaccine) – two key vaccines, especially when it comes to communities who have difficulty accessing prevention and early diagnosis of cervical cancer and live in significantly worse sanitary conditions, predisposing infants to infections with rotavirus, which can be fatal in the absence of access to health care.
- Families living in poverty (especially those inhabiting informal dwellings and mothers without personal ID cards) face barriers in subscribing new-born babies at paediatric or GP practices and thus, access to vaccinations and preventive examinations decreases. The declining number of practising paediatricians in some regions makes access to such care almost impossible for the most vulnerable households.

The NRSF partially identifies those challenges but the benchmark criteria in the National Action Plan are too low, for example, identification and coverage of children without a GP (General Practitioner) is set to 300 for a two-year period (2022-2023). Most of the measures in the plan are non sustainable and rely on mobile services and efforts of the health care mediators, instead of providing permanent services, empowering Roma to be proactive in GP subscription and thus, getting access to preventive care, including vaccination.

There is no reliable disaggregated statistical data on the Roma population or on the population living on the brink of poverty. A current microcensus in the Nadezhda quarter emphasised a significant overestimation of the segregated population,⁴⁴ which is also an obstacle towards offering relevant services. Health care mediators could be a possible source of data, but further training in statistical fieldwork methods would be needed and such is not currently planned by the NRSF. The lack of relevant data is a probable barrier towards addressing the diversity in the Roma communities. However, there are some measures for children, pregnant women, and young mothers, as well as for uninsured and non vaccinated, as well as for people at risk of 'social' diseases: HIV/AIDS, hepatitis, and tuberculosis, as well as prophylactics of breast cancer.

2.5. Housing, essential services, and environmental justice

It is well known from the population censuses (1992, 2001, 2011) and from EUMIDIS II survey of the FRA that the housing situation of Roma people in Bulgaria is much worse than the housing situation of the total population. More than two-thirds of Roma live in ethnically segregated neighbourhoods, usually located on the outskirts of the districts or municipality. These neighbourhoods lack adequate infrastructure or the existing ones are in a much worse condition than in other residential areas. In many places, there is a lack of construction regulations and settlement planning, which leads to the overrepresentation of informal housing, limited access to tap water and sewerage, electricity, and garbage collection, as well as lack of public transport and access to postal services.⁴⁵ A recent study in four selected quarters in Sliven Municipality and Targovishte Municipality show greater regional differences than the rural–urban ones. There are also extremely high internal inequalities observed within every neighbourhood. There are zones within quarters where

⁴³ UNICEF (2017). *Situation Analysis of Women and Children in Bulgaria*, p. 33. Available at: <https://www.unicef.org/bulgaria/media/2821/file/BGR-situation-analysis-children-women-bulgaria.pdf>

⁴⁴ Pamporov, 2021. op. Cit.

⁴⁵ Bliznakov, N. (2019). *Housing and Essential Public Services*, in Roma Civil Monitor (2019), *Civil Society Monitoring Report on the Implementation of the National Roma Integration Strategy in Bulgaria: Assessing the Progress in Four Key Policy Areas of the Strategy*. Available at <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-2-bulgaria-2018-eprint-fin.pdf>, pp. 21-30.

housing conditions do not differ from the country average and some 10%–15% live better than the national mean indicators. At the same time, there are other zones, often labelled “slums within the slums”, where a total deprivation of proper housing conditions can be observed: no access to running water, no electricity, and no access to communal services. In the four settlements, 57% to 87.5% of the households live below the national poverty line, and between 35% and 88% of the households are overcrowded. The desk research shows a lot of shortcomings in the national legislation, as well as the existence of irrelevant and ineffective practices at the municipal level. The right of access to housing in Bulgaria is not made explicit in the constitutional law, and nor is it recognised in any normative act. The country has no current national housing policy regulated in a strategic document, and it also lacks uniform legislation to regulate public engagement in the provision of housing.⁴⁶

Unfortunately, the NRSF does not address this issue in a sufficient manner compared to the known scale of challenges on the ground. There is only one short paragraph, describing “the problem of illegal construction” and mentioning the constant risk of evictions. Instead of improving the housing conditions, the NRSF focuses on the need of mapping the segregation and spatial distribution. It is an important urbanistic approach, but it is just a first step and not a solution. The operational goal under this priority is the improvement of living conditions, including the adjacent technical infrastructure as the infrastructure of public services does not correspond to the set general goals, among which only municipal housing, construction of health and social infrastructure, expanding access to quality water, electricity and sewerage, and the search for tools to eliminate illegal neighbourhoods are provided. The only specific goal that has been set is to change the legislation to introduce the principle of proportionality when undertaking forced evictions. In essence, the National Action Plan does not contain any specific measures in line with the objectives set out in the NRSF, except for the completion of social housing under the Regional Development Operational Programme 2014-2020, for which there is evidence that only a minimum number of cases are provided for Roma families.

There is no relevant data used in the NRSF and here we would like to stress the fact that the official statistics on housing in Bulgaria is disputable since the National Statistical Institute had neither the proper tools nor the legislative right to cover the informal housing; and thus, the real issues among the slum settlements are often left out of the official aggregated figures (based on the national censuses).

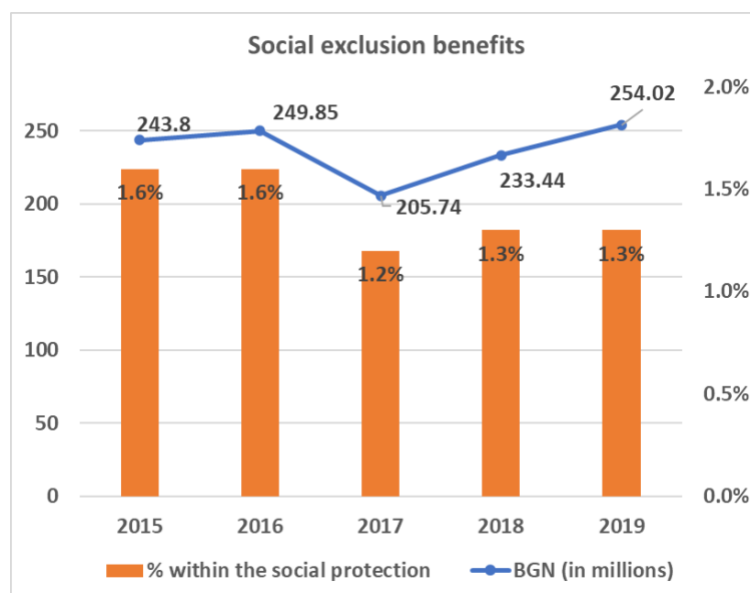
2.6. Social protection

The absolute poverty in Bulgaria has dramatically declined over the first decade after its accession to the EU. However, a study shows that it remains high by EU standards, though the severe material deprivation rate has fallen to almost one-third of its pre global financial crisis level. Despite that, the share of the population at persistent risk of poverty has increased. It is particularly high for the elderly and, to a lesser extent, children. During the same period, income inequality has increased significantly and is now the highest in the EU. Unlike most EU countries, Bulgaria did not use a fiscal policy to offset the increase in market income inequality. Moreover, most EU countries increased fiscal redistribution to offset the rise in market income inequality. In contrast, Bulgaria reduced fiscal redistribution and therefore, the disposable income inequality increased more than market income inequality (Hallert 2020).⁴⁷

⁴⁶ Dobrudzhalieva, A., A. Pamporov. (2022). *Living Conditions in Squatter Settlements and Possible Improvement Policies*. Habitat for Humanity - Bulgaria [Жилищни условия в квартали с концентрация на бедност и политики за тяхното подобряване]. Available at: <https://bit.ly/3vdv6sE>

⁴⁷ <https://www.imf.org/en/Publications/WP/Issues/2020/07/31/Poverty-and-Social-Protection-in-Bulgaria-49552>

The social protection system in Bulgaria is synchronised with the EU principles and it includes Sickness, Disability, Old age, Survivors, Children, Unemployment, Housing, and Social Exclusion. The last one covers the most vulnerable population living in poverty. The money is distributed through municipalities and covers social food, heating benefits, etc. Data for the period 2015-2019 shows that it is about 1.2% to 1.6% of the social protection budget. All the measures are mainstreamed and there is nothing explicitly targeting Roma. However, the experts say that the Roma and the rural elders, in general, are the main beneficiaries of these funds. This issue partially relates to Measure 4.4. in the 'Employment' chapter of the National Action Plan.



The NRSF has explicitly taken into consideration the data from the EU FRA MIDIS II Survey,⁴⁸ and points out that over 80% of Roma people live under the poverty line. However, the NRSF further discusses the general EU trend of a decrease in the number of persons living in poverty, instead of looking at the EU SILC data, showing that over 2.2 million people are at risk of poverty in Bulgaria, which is strongly correlated with the self-declared ethnic identity of the respondents: 66.2% of Roma compared to 17.8% of Bulgarians.⁴⁹

Concerning access to social protection, similar to the situation in other countries,⁵⁰ this very much depends on the ID documents and official residence registration. Some international organisations working to combat poverty in Bulgaria, such as Doctors Without Borders and ATD Forth World, raised the flag that the most vulnerable Roma are practically excluded from social protection, as well as social and health care services due to the lack of ID cards. This issue is addressed in the NRSF as an objective: 'Improving the Legal Awareness of Roma about Obtaining, Use, and Storage of Bulgarian Personal Documents', but it is not currently included in the Action Plan. However, people who have no bank account or ID cards, are not eligible for assistance.

Overall, the NRSF's aims and measures are insufficient and are rather targeting awareness raising, and not grassroots social protection or prevention of trans generational poverty. Since the Social Assistance Agency does not collect ethnicity-based data (even self-

⁴⁸ https://fra.europa.eu/sites/default/files/fra_uploads/fra-2016-eu-minorities-survey-roma-selected-findings_en.pdf

⁴⁹ https://www.nsi.bg/sites/default/files/files/pressreleases/SILC2020_en_FRTG25T.pdf

⁵⁰ Sanders, C., Burnett, K., Lam, S., Hassan, M., & Skinner, K. (2020). "You Need ID to Get ID": A Scoping Review of Personal Identification as a Barrier to and Facilitator of the Social Determinants of Health in North America. *International Journal of Environmental Research and Public Health*, 17(12), 4227.

identification), all the measures and indicators are mainstreamed, and it will be very hard to evaluate the efficiency, effectiveness, and impact in the future. In general, access to social assistance is rather an intricate procedure, particularly for those Roma who have a low or incomplete education or for those who reside in small or remote villages, without a social assistance office.⁵¹ For some Roma, filling in the forms and packing up the files with all required documents could be a real challenge, and it is often reported that some health care mediators or civil society activists are assisting them, since there is not always a social assistance staff, willing to help them. This issue is not addressed in the NRSF.

Unemployed individuals of working age who receive monthly social assistance under the terms and circumstances of Art. 9 of the Regulations for 'Implementation of the Social Assistance Law' are required to conduct 14 days with four hours of daily labour for public services; in return, they receive approximately 40 BGN per month, which is inadequate (in big cities, one cannot even pay for public transportation to get to work) and Roma often refuse or do not apply for assistance. This issue is not addressed in the NRSF, although, *de facto*, it is a state-established exploitation. An earlier comparative study shows that such public work programmes fail to reduce poverty, for those who enroll, as well as they may reduce chances of getting a regular job in the primary labour market.⁵²

2.7. Social services

In 2010, Bulgaria started the process of deinstitutionalisation of social services, which paved the way for a new approach that took almost ten years to get finalised. In the beginning of 2019, a new Social Services Act (SSA) was adopted, which entered into force in July 2020. Article 14, paragraph 2 of the SSA defines the main risk groups as follows:

- All children;
- Children at risk within the meaning of the Child Protection Act;
- Parents, adoptive parents, carers, applicants for adoption and foster families' applicants;
- Children and adults with disabilities;
- Adults in crisis or in need of overcoming the consequences of such a situation;
- Elders above the working age;
- Persons caring for adults.

The philosophy of the SSA is that all services are mainstreamed and therefore, minority groups (including Roma) and transborder migrants are not explicitly listed. However, the law demonstrates awareness of the multiple vulnerabilities, and they are specified in Art. 8 of SSA:

"The provision of social services shall not discriminate directly or indirectly against persons on grounds of gender, race, nationality, ethnic origin, human genome, nationality, origin, religion or belief, education, tenet, political affiliation, personal or social status, disability, age, sexual orientation, marital status, property status or any other feature..."

According to the National Contact Point, aiming for a better synergy and coherence between the different fields of public intervention, the social services in the NRSF are set

⁵¹ There are only 50 rural offices out of 5,000 villages (by 31 December 2020).

⁵² Messing, V. et al. (2013) 'From Benefits to Brooms' Case Studies Report on the Implementation of Active Labour Market Policies for ROMA at Local Level. Available at: <http://publications.ceu.hu/sites/default/files/publications/cps-working-paper-neujobs-wp19-alm-implementation-2013.pdf>

not in one priority, but rather distributed between different public institutions, with regard to their objectives and the target groups:

- Social housing is set within the 'Housing' priority, together with infrastructure improvements for social services and nurseries, with the Ministry of Regional Development as the responsible institution.
- Awareness-raising campaigns about the rights of the child and rights to access social services are set within the 'Rule of Law' priority, with the State Agency for Child Protection as the responsible institution.
- The socially engaged art platform is set under priority 'Culture', with the National Culture Fund as the responsible institution.
- The training of social and educational mediators is under the 'Education' priority, with the Ministry of Education as the responsible institution.
- Career orientation and professional training are set under the 'Employment' priority, with the Employment Agency as the responsible institution.
- The training of health care mediators is under the 'Healthcare' priority, with the Ministry of Health Care as the responsible institution.
- Sheltering services for children and women who are victims of trafficking are set under the "Rule of Law" priority.

The upper bulleted list does not include the culturally tailored services for Roma people with disabilities. It is well known that Roma people in Bulgaria are overrepresented in some genetic and hereditary diseases⁵³ and such services, sensitive to poverty and Romani culture could be of great value.

2.8. Child protection

The child protection system in Bulgaria is in line with the international approach and includes measures and structures to prevent and respond to abuse, neglect, exploitation, and violence affecting children, as set up in Article 19 of the UN Convention on the Rights of the Child (UNCRC). It is regulated mainly by the Child Protection Law, but it is included in the spirit of the Criminal Code, Antihuman Trafficking Law, the Family Code, and the Social Assistance law, and the Social Services Act. Although it is acknowledged that the Bulgarian legislation is harmonised with international standards, the regulatory framework is the result of a gradually evolving process that still lacks full integration. The most notable shortcoming is the lack of a legal basis for prevention, in particular regarding violence against children, as well as specific support for parents and caregivers to develop their parenting skills. There are also major gaps in access to justice for children. They have been cited several times in connection with the need to bring the regulatory framework in line with international standards (UNICEF 2019).⁵⁴ Roma children are overrepresented in institutional care, reaching two-thirds of all children in this category in Bulgaria. These children are more likely to be victims of violence by law enforcement and other government officials. The Bulgarian government has repeatedly been called upon to improve the effectiveness of the measures for the full inclusion of Roma and especially Roma children, their exploitation of children (including trafficking).⁵⁵ Even though Roma children are admittedly vulnerable to a plethora of threats, such as various forms of abuse,

⁵³ Tarnev, I. O. Kamenov, M. Popov, L. Makaveeva, V. Aleksandrova (2002). *The Health Problems of the Roma – Nature, Consequences, and Ways to Overcome Them*. Sofia: Open Society Foundation [in Bulgarian]. Available at: https://osis.bg/wp-content/uploads/2018/04/OSI_Publication_Public_health_1.pdf

⁵⁴ *Analysis of the Child Protection System in Bulgaria* (Situational Report, 2019). Available at: <https://www.unicef.org/bulgaria/en/media/9361/file>

⁵⁵ Ibid.

neglect, and human trafficking, and given the risk factors, such as their overrepresentation in child protection, care and service systems, there is little to no mention of measures to respond to and prevent those threads at the core of the NRSF. However, a good indication for the child protection intentions is the reference to the promotion of positive actions to overcome traditional practices in the Roma community that violate the rights of women and children as one of the targeted approaches to implementing the NRSF.

In the 'Rule of Law' priority area, there is a heavy emphasis on the issues of and measures against inciting discrimination, violence or hatred, based on race, whereas juvenile marriages and forced marriages, which Roma children oftentimes face, are solely partially mentioned in two sub-objectives – Objective 5, aimed at increasing parental capacity in support of vulnerable families and improving parental care in terms of children's rights protection; and another – a subtopic of Objective 6, including prevention of undesirable social phenomena in areas of poverty concentration (including early marriages, domestic violence, domestic crime and antisocial behaviour). On the contrary, in the 'Rule of Law' section of the NRSF Action Plan, specific and targeted measures for child protection are envisioned. An honourable mention is Measure 3.8 regarding the training of justice professionals on issues related to the protection of child victims, including children, victims of violence, sexual and economic exploitation, abduction, and trafficking, as well as children who have witnessed such crimes; along with all three dedicated measures for Objective 7, concerning the efforts to combat human trafficking. Additionally, Objective 5 includes six targeted measures, funded by the State Agency For Child Protection (SACP) budget, dedicated to the implementation of the Coordination Mechanism for Referral and Care of Cases of Unaccompanied Bulgarian Children and Child Victims of Trafficking Returning from Abroad; raising awareness of children and their families about existing mechanisms for information and prevention of violence among and against children; promotion of the National Telephone Line for Children; informing and advising families; monitoring and control of the respect for children's rights in educational institutions, medical establishments, social services, integrated health and social services for residential care.

Specific measures against early marriages are to be included in the 'National Programme for Prevention of Violence and Child Abuse', which has not yet been released, thus actions for prevention of early and forced marriages or sexual violence against children from marginalised groups are not found in the NRSF Action Plan.

2.9. Promoting (awareness of) Roma arts, culture, and history

One of the main issues serving as a solid ground for the prejudices and discrimination against Roma in Bulgaria is the prejudice regarding the 'inferiority of Roma culture and Roma people'. "There is no Romani language" (since there is no written alphabet), "there is no Romani folklore" (but just bricolage borrowings), "there is no Romani history" (since Roma are travelers and have no historians) are just some of the widespread stereotypes.⁵⁶ They easily lead to inhumanisation and stigmatisation of Roma and disparagement of Romani culture.⁵⁷

Therefore, promoting and awareness of Roma arts, history and culture is a key element of the Roma inclusion. However, in the new NRSF this is the least developed chapter, done within just a page. Instead of a situation analysis and data-based intervention, this issue

⁵⁶ Kolev, D., T. Krumova, A. Pamporov, D. Radulescu, S. van der Zwaan, T. Balcik (2013). *Beyond anti-Roma Stereotypes: the World is not Just White and Black*. Plovdiv: Astarta. Available at: https://www.researchgate.net/publication/260368502_The_anti-Roma_stereotypes_in_Bulgaria#fullTextFileContent

⁵⁷ Topalova, V. (2007) *Infrahumanisation, Stigmatisation, and Illusory Correlation in the Social Attitudes towards Gypsies/Roma*. In: *Roma Integration in the Bulgarian Society*. Sofia: Institute of Sociology at BAS, pp. 231-249.

offers just a declarative statement:

“The Romani culture is a part of the European culture and European values. The Roma have contributed to the EU’s cultural wealth, diversity, economy, and overall history. The active participation of Roma individuals or group performers in the creation of products of European culture is proof of the potential for the implementation of inclusive and integration policies in other spheres of public, economic, and political life.”

The same priority was underdeveloped in the previous programming period and the official monitoring underlines the fact that the concept of ‘culture’ was shrunk to “folklore practices”.⁵⁸ All the measures are mainstreamed, and Roma performers and organisations have to compete. On the argument that this is not a proper approach, during a focused discussion, an expert from the Ministry of Culture replied that otherwise the majority of applicants will be discriminated against. It shows a huge institutional problem with the understanding of minority specifics and the need for support of people living in poverty, who do not have access to proper responses and information to bid and compete at open procedures.

Despite the monitoring recommendations from the previous strategic period, nothing in the design of the measures and the approach of the Ministry of Culture has changed. As such, there will be no option for transparent monitoring and proper application of DAC criteria to the interventions of this priority.

⁵⁸ Pamporov, Markova, Yordanova, 2020. pp. cit., pp. 5, 267.

3. EXPECTED EFFECTIVENESS

3.1. Coherence with related domestic and European policies

The NRSF 2021-2030 and the National Action Plan 2022-2023 were approved by the Council of Ministers of the Republic of Bulgaria. The adoption of the NRSF by the Council of Ministers instead of the National Assembly of the Republic of Bulgaria, which adopted the previous NRIS,⁵⁹ is a step back regarding the value of the document and provides space for further changes to the documents by the next Council of Ministers.

The new NRSF is named identically to the name of the European Framework, which emphasises equality, inclusion, and participation of Roma. It contains an adequate but non-exhaustive analysis of the main problems of Roma in the fields of education, health, employment, and housing, and mentions that the Roma are subject to discrimination, poverty, and social exclusion.

The NRSF mentions that its development takes into account the guidelines given by the EU Strategic Framework, as well as its annexes, Guidelines for Planning and Implementing the National Roma Strategic Frameworks and Portfolio of Indicators, taking into account the findings of the 2018 EC Report on the midterm evaluation of the EU Framework for National Roma Strategies of 2011 and the European Parliament Resolution of 17 September 2020 on the Implementation of National Roma Integration Strategies. It is defined that the NRSF will contribute to the implementation of the EU Action Plan against Racism (2021-2025) and the European Pillar of Social Rights. The seven minimum objectives of the Strategic Framework proposed by the European Commission have been incorporated, as well as the 'Ten Common Basic Principles for Roma Inclusion' adopted by the Council of the European Union in 2009.

It is stated that the NRSF corresponds to the UN international instruments in the field of human rights and the rights of persons belonging to minority groups to which the Republic of Bulgaria has joined and committed to their implementation, listing all major international documents in this area. It is explicitly mentioned that the NRSF is in line with the 'Framework Convention for the Protection of National Minorities' and is in line with the *Recommendation of the Committee of Ministers of the Council of Europe to adopt a positive action approach to the Roma community* and the Council of Europe *Plan for the Inclusion of Roma and Non-resident Travelers/Non-residents 2020-2025*. It is declared that the NRSF takes into consideration the guidelines given by directives, recommendations, resolutions, communications, conclusions, and other documents of the European Union, as well as Bulgaria's commitments to the Organization for Security and Cooperation in Europe (OSCE), including the OSCE's 'Action Plan on Improving the Situation of Roma and Sinti in the OSCE Area', adopted in 2003.

The NRSF indicates that it follows the guiding principles of the 'National Development Programme: Bulgaria 2030', in which the vision and the general goals of the development policies in all sectors of the government are defined, as well as the ambition regarding the implementation of the NRSF to contribute to the achievement of the goals of the 'National Development Programme' and mainly to its goals related to accelerating economic development and reducing inequalities. This is set in connection with the findings that the growth of the Bulgarian economy is not sufficiently inclusive to help reduce social inequalities and overcome social exclusion. It should be noted that the 'National Development Programme' does not explicitly target the Roma, but uses instead the broad

⁵⁹ *National Strategy of the Republic of Bulgaria for Roma Integration 2012 - 2020*, adopted by Decision of the National Assembly on 1 March 2012 and promulgated in the State Gazette, issue 21 from 13 March 2012. Available at: <https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=62412>

term “vulnerable persons and families”, for which measures have been incorporated mainly in the field of education and social inclusion.

Regarding the coherence with other strategic documents related to the individual sectoral objectives, the NRSF declares that the set objectives are in line with:

- Regarding the sectoral objective “Education”: *The Strategic Framework for the Development of Education, Training and Learning in the Republic of Bulgaria 2021-2030*, prepared by the Ministry of Education and Science, and developed in accordance with the framework ‘Programme Education 2021-2027’. It is expected that the implementation of the priority measures will contribute to the implementation of the indicators of priority “Education and Skills” of the ‘National Development Programme: Bulgaria 2030’ and the implementation of certain aspects of Objective 4 ‘Ensuring Inclusive and Equitable Quality Education and Promoting Lifelong Learning Opportunities for All’ of the UN Sustainable Development Goals.
- Concerning the sectoral objective ‘Health’, the NRSF does not define an explicit link with another national strategic document, but rather defines the expectation that the implementation of priority measures will contribute to the implementation of indicators for priority ‘Health and Sports’ from the ‘National Development Programme: Bulgaria 2030’ and will play a key role in the implementation of Objective 3 ‘Ensuring a Healthy Life and Promoting the Well-being of All at All Ages’ of the UN Sustainable Development Goals.
- With regard to the sectoral objective ‘Employment’, the NRSF does not define either an explicit link with another national strategic document but it rather defines the expectation that the implementation of measures under this priority will contribute to the implementation of indicators under the priority “Social Inclusion” of the ‘National Development Programme: Bulgaria 2030’ and will play a key role in the implementation of Objective 1. ‘Eradicate Poverty in All Its Forms and Everywhere’ and some aspects of Objective 2. ‘End Hunger – Achieve Food Security and Better Nutrition, Promote Sustainable Agriculture’, Goal 5. ‘Achieve Gender Equality and Empower All Women and Girls’, Goal 8. ‘Promote Inclusive and Sustainable Economic Growth, Full and Productive Employment and Decent Work for All’, and Goal 10. ‘Reduce Inequalities between and within the Countries’ of the UN Sustainable Development Goals.
- Regarding the sectoral objective ‘Housing Conditions’, the NRSF again does not refer to another national strategic document but defines the expectation that the implementation of measures under this priority will contribute to the implementation of indicators under priorities ‘Social Inclusion’ and ‘Local Development’ of the ‘National Development Programme: Bulgaria 2030’ and will play a key role in the implementation of Objective 11. ‘Transforming Cities and Towns into Inclusive, Safe, Adaptable and Sustainable Places to Live’ and Objective 6. ‘Ensuring Accessibility and Sustainable Management of Water and Sanitation for All’ of the UN Sustainable Development Goals.

The NRSF does not contain an explicit reference to other national strategic documents within the framework of the Coordination Mechanism for Economic and Fiscal Policies of the European Semester, nor to the Partnership Agreement for the programming period 2021-2027 or the operational programmes. The operational programmes are mentioned in the NRSF only as a possible source of funding for the realisation of the goals and measures set in it. There is no reference to Bulgaria’s Recovery and Resilience Plan.

The lack of reference to other national strategic documents raises doubts as to whether and to what extent an analysis has been made on the compliance of the NRSF with existing ones, as well as whether changes and/or additions to other national strategic documents are not required.

The NRSF envisages the formation and maintenance of the necessary administrative capacity among key line institutions and secondary budget managers by assigning certain functions to directorates, departments, units or individual experts responsible for the implementation of the Roma inclusion policy, as well as by establishing specialised units, identifying key line ministries and bodies following the identified sectoral priorities as responsible for updating the relevant thematic programme operational documents for Roma integration, implementation of planned measures, monitoring, evaluation and reporting on the implementation of the NRSF. In addition, the need to build administrative capacity at the district level is emphasised, with at least one staff member appointed in each district administration whose main job functions are related to inclusive policy.

The NRSF's effectiveness depends on reaching compliance with other national strategic documents, capacity building of the administration and setting up clear indicators for measuring the result. Other crucial issues related to effectiveness are defining strict budget lines for the implementation of tasks related to the NRSF's goals and the participation of Roma in the whole process, including planning, implementation, and evaluation of results. If the above are not set up clearly, the effectiveness will rather be insufficient or at least questionable.

3.2. Responsibility for NRSF coordination and monitoring

All envisaged measures for the implementation of the NRSF are controlled and approved by the Deputy Prime Minister, who is appointed chairman of the National Council for Cooperation on Ethnic and Integration Issues, established as an advisory body within the administration of the Council of Ministers. The National Council includes the responsible ministries and other relevant administrative structures, as well as civil society organisations.

The relevant ministries, as well as the national equality body – the Commission for Protection against Discrimination, and regional and local authorities, were involved in the process of drafting the NRSF, but their proposed measures are limited to those that they implement following the relevant strategic documents.

Steps need to be taken to strengthen the role of the National Council to ensure adequate inclusion of Roma, especially young people, and women, in the processes of control and monitoring the implementation of the NRSF. The NRSF envisages a coordinating role for the National Contact Point regarding its implementation, which in the case of Bulgaria is the Secretariat of the National Council. At present, the Secretariat does not have sufficient human resources, administrative capacity, and adequate financial security to coordinate the overall implementation of the NRSF, although its participation in coordinating the allocation of European Union funds to achieve the objectives of the NRSF is ensured.

It is also envisaged to establish a commission for the coordination of the implementation of the NRSF, as its powers are not detailed. It is also envisaged to establish consultative structures and mechanisms with the participation of civil society in the relevant departments, regional governors, and local authorities. At the municipal level, the establishment of councils for cooperation on ethnic and integration issues is envisaged. The implementation of the NRSF is ensured through the adoption of short-term (three-year) national action plans, in which a responsible institution is nominated for each of the envisaged measures: the respective ministry or agency. The monitoring of the implementation is set to be carried out by collecting and analysing information in an electronic monitoring system, which is currently being set up.

What is planned is likely to be a meaningful monitoring process, given that Roma are included and the capacity of the administration is improved.

3.3. Quality of the plan

The NRSF is defined as a framework document that sets out guidelines for the implementation of policies for socioeconomic inclusion and participation of Roma. The

document states that the lessons learned have been considered in its development and that it will build on what has been achieved in the implementation of the NRIS 2012-2020. The document, in line with the EU's strategic framework, describes the objectives of the priorities in the main sectoral areas. Each priority includes at least one defined operational objective and several key objectives, under which the main implementation measures are listed. The proposal of civil society organisations to follow the structure of the strategic framework set by the EU regarding horizontal objectives such as equality, inclusion, and participation was not accepted. The structure of the document follows that of the NRIS 2012-2020 as the horizontal objectives are set in the priority 'Rule of Law and Non-Discrimination'. In addition, the priority 'Media and Culture' and the section 'Empowerment of Roma Women' were developed. In general, the content of this section repeats already planned measures under the priority 'Rule of Law and Non-Discrimination'.

The measures envisaged for the implementation of the objectives are detailed in terms of deadlines for implementation not in the NRSF itself, but in the National Action Plan, and for some of the measures, these deadlines are not realistic, for example minimising the poverty rate. The NRSF contains a short section aimed at assessing the risks to the achievement of the set goals. Risks are assessed and include insufficient recognition of policy commitments by the responsible institutions; insufficient staffing and financial security of policies; high levels of economic inequality, including strong regional disparities and imbalances; the high share of people at risk of poverty; the low level of digital skills of the population; the existing manipulation of public attitudes and reactions against the implemented policies. No detailed plan is available to prevent or mitigate the identified risks. Given that a similar lack of a plan to avoid risks appeared to have been an obstacle before the implementation of the previous plans, it will be of crucial importance to avoid it now, to ensure improved results.

3.4. Funding

The NRSF does not clearly and specifically indicate the financial security of the measures. For each of the sectoral priorities, it is envisaged that the measures to meet the set objectives will be implemented through funding from the state budget, municipal budgets, EU Structural Funds, Financial Mechanism of the European Economic Area, Norwegian Financial Mechanism, and other donor programmes. The National Action Plan does not specify either the specific funding provided for each of the envisaged measures, but instead it mostly indicates whether the measure will be implemented through the state or local budget or through a specific programme. The concept of using private capital is not included. It is not reported that the ambiguity regarding the financing of the measures under the previous strategic document has led to the fact that a large part of them remained unimplemented due to lack of funds. The current NRSF faces the same risk.

3.5. Monitoring and evaluation

The monitoring plan names the responsible ministries that must prepare annual reports on the implementation of specific priorities, and the National Contact Point to collect these reports and summarise them in an administrative report to be approved by the members of the National Council for Cooperation on Ethnic and Integration Issues, adopted by the Council of Ministers, and sent for information to the National Assembly. In addition, the NRSF envisages annual monitoring by collecting quantitative indicators set out in a specially developed online monitoring system.

In the appendix to the NRSF, there is a table with defined indicators, for most of which basic and target values are indicated. At the suggestion of civil society organisations, indicators for monitoring ethnic poverty among Roma were included, according to EU-SILC. Some of the indicators are ethnically disaggregated - those for which EU-SILC data are available: relative share of people at risk of poverty; relative share of children under 18 at risk of poverty; relative share of people living in poor housing conditions; relative share of persons living in overcrowded housing; relative share of persons living in a household without a toilet and bathroom in the dwelling; relative share of children (0-17

years) living in material deprivation; relative share of the poor who self-identify as employed by ethnicity (Roma).

It is noteworthy that some indicators have low target values - for example, the relative share of people living in poor housing conditions has the following baseline values: 10.4% (2020) for the country as a whole and 51.0% (2020) for those who self-identify as Roma. The set target value of the indicator is a reduction by one-third of the difference in terms of the share of residents in housing with extremely poor conditions, which is about 14% reduction of the share of Roma living in poor housing conditions. For ten years, this is a rather modest percentage. For other indicators, it is not clear whether the target value applies to the Roma or to population as a whole. For example, the relative share of children (0-17 years) living in material deprivation is as follows: 18.4% (2020) for the country as a whole, 64.0% (2020) for the self-identified as Roma. The target value of the indicator is reaching the EU average, and it is not clear to whom it refers - the Roma or the entire population. Ethnically disaggregated data from a survey implemented by the EU Agency for Fundamental Rights (FRA) and the National Statistical Institute are expected to be used to measure discrimination.

The NRSF also includes indicators that are not ethnically disaggregated. For example, for the indicator 'relative share of young people (aged 20-24) with at least secondary education', the set baseline is 85.4% for 2020, while the target is 89.0%. Unfortunately, the share of Roma youth with secondary education is far below this baseline. Another similar example is: The indicator 'early school leavers' (relative share of persons aged 18-24 who mostly completed primary education and did not participate in education and training, from the population of the same age) has a base value of 12.8% for 2020 and the target value is 7.0%. The analysis of the NRSF shows 79% of Roma girls and 65% of Roma youth aged 16-24 who are in the NEET group, but these values are not taken as baseline indicators.

The employment and unemployment indicators used are also not ethnically disaggregated, which makes their monitoring meaningless, as they do not consider the extremely high level of unemployment and the extremely low level of employment among the Roma. The observation of indicators that refer to the general population but are used for the Roma creates a misconception about the problems of the Roma and the applicable solutions.

In terms of health, there is a life expectancy indicator, again not specifically for the Roma, but for the general Bulgarian population. The NRSF lacks an important indicator - infant mortality, which is highest in areas with a concentrated Roma population.

In addition to statistics, it is recommended to include proxy data characterising the situation in areas such as employment, morbidity, education, and housing security at the neighbourhood level, organising a periodic planned collection of empirical data from neighbourhoods with a concentration of socially excluded and marginalised populations.

It is recommended that the indicators in this system be carefully reviewed and supplemented not only with indicators for completed activities (output), but also with indicators for impact (outcome), which correlate with the target indicators (impact). For example, in addition to the number of participants in training and employment courses, it is good to track how many of the trainees have been employed or started their own business and how many of them are sustainable in employment. The monitoring and evaluation system needs to be supplemented with indicators of resolved community problems, as well as to plan milestones and monitor their implementation.

3.6. Assessment of the expected effectiveness and sustainability

The distribution of the commitments for the implementation of the NRSF is made relevant to the sectoral approach used in determining the priorities. The weak point remains the lack of concrete planning for financial security, which puts at serious risk the implementation of the envisaged goals and measures.

4. ALIGNMENT WITH THE EU ROMA STRATEGY

4.1. Reflecting diversity among Roma

The analytical part of Bulgarian NRSF (titled “III. National Context: Analysis of the Problems and the Situation”) considers the vulnerable situation (including the intersectional discrimination) of Romani women, youth, and elderly people: “Categories of the Roma community, such as Roma women, young people, and the elderly, remain particularly disadvantaged. Once, they are discriminated against as Roma and the second time including by members of the Roma community. Roma women and young people continue to lag behind Roma men and women in the general population in key areas such as health, education, and employment”.⁶⁰ Particular texts are included also in the description of the specific problems faced by Roma in the fields of education and employment.

The disadvantaged situation of Roma women is also included in the part that describes the “reasons for the unsolved problems”. It covers the diversity of factors, including the lack of empowerment of Roma women, the traditional attitudes within the community, and intersectional discrimination.⁶¹

Furthermore, the analytical part recognises the variety of Roma groups and the need of taking this aspect into account when planning specific actions and measures targeting Roma.⁶²

This is extremely important for Bulgaria since the Roma community and the people identified by the surrounding population as being Roma is diverse in ethnocultural and socioeconomic terms. There are also significant regional differences.

However, the analytical part has overlooked the challenges other specific groups face. These groups are described in the EU Roma Strategic Framework and are also available in Bulgaria: Roma with disabilities, EU-mobile citizens, Roma LGBTQ, etc., including Roma without IDs. As a result, the NRSF also underestimates these groups and includes no measures to address their challenges. This is one of the important lacking elements in the new NRSF.

Although the analytical part acknowledges the challenges Roma women, children and elderly people face, the following parts (especially IV. Vision, V. Strategic Aim, and VI. Guiding Principles and Horizontal Objectives), do not pay specific attention to them. Certain specific objectives regarding Roma women, children and elderly people are partly covered by the Health Care and Employment priority fields, in most the cases, these objectives are not new but further reintroduced from the previous NRIS 2012-2020. Instead, the chapter on the ‘Rule of Law and Non-discrimination’ envisages a broader set of specific objectives regarding Roma women, youth, and children. An important advantage of the new NRSF is the existence of the priority/ chapter VIII. ‘Empowerment and Equal Opportunities for Roma Women’. It was included as a result of the advocacy efforts of Roma organisations. The Chapter sets as an operational objective „promoting the empowerment of Roma women, for their transformation into an active factor in social, political and public life, overcoming their exclusion in the main areas of education, health,

⁶⁰ National Strategy for Equality, Inclusion and Participation of Roma, p. 9.

⁶¹ Idem, p. 19.

⁶² Idem, p. 18.

employment and housing”.⁶³ It follows the proposal of the Roma Integration Network.⁶⁴ At the same time, the chapter does not set new specific objectives and activities (although Roma NGOs have proposed such), but repeats and summarises objectives included in the other chapters.

Part XII. ‘Indicators for Monitoring’ contains 24 indicators. Half of them are general indicators that assess and evaluate the development of certain socioeconomic mainstream trends. The other half measures the specific impact on the Roma community as well. Three of these indicators are linked with the impact on Roma children and youth: ‘3. Relative share of children under 18 at risk of poverty’, ‘7. Relative share of children aged 6-14 from households in which at least one member identified himself as Roma attending schools where all or most of the classmates are Roma’, and ‘16. Relative share of children (0-15 years) living in material deprivation’.⁶⁵ There are no indicators regarding Roma women and other specific groups (Roma with disabilities, EU-mobile citizens, Roma LGBTQ, etc., including Roma without IDs).

4.2. Combining mainstream and targeted approaches

Bulgaria was one of the first European countries to approve its targeted Roma Strategy – Framework Programme for Equal Integration of Roma in Bulgarian Society in 1999. Subsequently, other targeted Roma-related documents were approved: the Strategy for Educational Integration (2004), the Health Strategy for Integration (2006), and the National Programme for Improving Roma Housing Conditions (2007) were approved. The general opinion of the civil society organizations was that these documents were of good quality and were prepared with the real participation of the nongovernmental sector and the Roma community.⁶⁶ However, these strategic documents were not bound by mainstream policies and remained rather isolated and left without real funding. In addition, there was no political will to implement them. As a result, these strategies were used primarily as ‘evidence’ of the existence of Roma policies in the process of Bulgaria’s accession to the European Union but did not lead to visible change.⁶⁷

The new NRSF (as well as the previous NRIS) pretends to be based on the ‘Ten Common Basic Principles for Roma Inclusion’ adopted by the Council of the European Union in 2009⁶⁸ including principle 2 ‘Explicit but not Exclusive Targeting’ and principle 4 ‘Aiming for the Mainstream’.⁶⁹ Describing each one of the seven priorities, the NRSF refers to the mainstream ‘National Development Programme: Bulgaria 2030’. These references are rather formal and one-way oriented since they indicate only how the NRSF would support the National Development Programme, but do not envisage changes in the way mainstream policies are designed and implemented so that they become Roma-inclusive. This shows a serious discrepancy with the spirit of the new EU Roma Strategic Framework. The latter clearly points towards a shift in the focus from socioeconomic integration to the

⁶³ idem, p. 36.

⁶⁴ Roma Integration Network is a coalition of Roma NGOs composed by *Amalipe* Centre, World without Borders, Indi Roma, New Road, Iskra Roma Foundation and Romano Drom

⁶⁵ National Strategy for Equality, Inclusion and Participation of Roma, p. 44-47.

⁶⁶ Deyan Kolev, Teodora Krumova, Milena Ilieva, Spaska Petrova. *Grazhdanska ocenka na izpalnenieto na Natsionalnata strategija za integrirane na romite 2012 – 2014* (Civil Monitoring Report for the Implementation of the National Roma Integration Strategy 2012 – 2014), p. 7-8. Available at: <http://www.amalipe.com/files/publications/Grajdanska%20ocenka.pdf>

⁶⁷ Focus groups with national Roma and pro-Roma NGOs, 27 April 2022

⁶⁸ National Strategy for Equality, Inclusion and Participation of Roma, p. 22.

⁶⁹ We should mention that the Bulgarian version of the NRSF provides a misleading translation of principle 4 (referring rather to assimilation than to equal inclusion – “приобщаване към мнозинството”). However, this is an official Bulgarian translation of the ‘Ten Common Basic Principles’ which might be illustrative of the deep notion of Bulgarian Roma integration policies.

responsibility of the Member States to eliminate barriers and to apply a three-pillar approach based on equality, inclusion, and participation of the Roma.⁷⁰

The specific aims defined in some of the priorities and the particular activities in the Action Plan combine three types of objectives and actions:

1. General ones: a significant number of aims and measures are such that the institutions would implement them anyway for the general society, no matter if there is a NRSF or not. The contribution of the NRSF to these aims and measures is that it enriches only formally their target groups with the additional "including Roma". Such an example is the aim of "Promoting dual training, internships and apprenticeships, as well as validation of acquired skills", etc.
2. Targeted ones directed at vulnerable groups or ethnic minorities: they include the Roma and in some of them, Roma are a significant part of the target group. At the same time, these measures are open to other minorities and vulnerable groups following the principle of 'explicit but not exclusive targeting'. Examples of such measures are the 'Preservation and development of the cultural identity of children and students with various ethnocultural markers, including Roma, through the promotion of intercultural education, as an integral part of the process of modernisation of the Bulgarian educational system', and many others.
3. Roma targeted ones: few of the proposed aims and measures are framed as 'directed at Roma' and their target group is predominantly Roma. Practice shows that such measures do not exclude other people who live in „Roma-like conditions“, for example 'Promoting social entrepreneurship among people from the Roma community by conducting information campaigns/events/webinars'.

The ratio among these three types varies across the different priorities of the NRSF, as pointed out in the table below. At the same time, the general measures are the dominant ones in the Action Plan.

| <i>Priority</i> | <i>Number of objectives</i> | <i>General objectives</i> | <i>Targeted objectives/ vulnerable groups</i> | <i>Roma targeted objectives</i> |
|-------------------|---|---------------------------|---|---------------------------------|
| Education | 7 | 3 | 4 | 0 |
| Health Care | 5 | 2 | 3 | 0 |
| Employment | 12 | 8 | 3 | 1 |
| Living conditions | 6 | 1 | 4 | 1 |
| Rule of Law | 9 | 0 | 8 | 1 |
| Culture and Media | 5 | 0 | 2 | 3 |
| Roma Women | The objectives repeat part of the objectives in the 'Rule of Law and Antidiscrimination' Priority | | | |

Weaknesses of the NRSF and especially of the Action Plan are that the aims and measures included are predominantly general actions that have been used or already in use before the NRSF and currently exist anyway. In general, there are only a few measures that contribute to mainstream policies enriching them with Roma-related aspects. Such measures are:

- Search for tools to improve the legal and economic conditions for the elimination of non-compliant with the Spatial Planning Act (SPA)/legislation on housing and neighbourhoods. Adoption of the Law for the amendment and supplementing of the Law on the arrangement of the territory for introduction of the principle of proportionality in issuing an order for the elimination of illegal construction, representing only a dwelling for its inhabitants (NRSF/Leaving Conditions).

⁷⁰ https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-eu/roma-equality-inclusion-and-participation-eu_en

- Search for tools to improve the legal and economic conditions for the elimination of non-compliant with the Spatial Planning Act (SPA)/legislation on housing and neighbourhoods. Adoption of the Law for the amendment and supplementing of the Law on the arrangement of the territory for the introduction of the principle of proportionality in issuing an order for the elimination of illegal construction, representing only a dwelling for its inhabitants (NRSF/Leaving Conditions).
- 8. Solving the problem of the lack of identity documents and the legal status of Bulgarian citizens from vulnerable communities, incl. and Roma (NRSF/Rule of Law).
- 1.8. Preparation of a proposal for normative changes to ensure better access of pregnant uninsured women to gynaecological examinations (AP/Health Care).

The existence of measures that can contribute to making the mainstream policies more inclusive and their combination with targeted measures could lead to a positive change in Roma-related policies. Unfortunately, such measures are just a few in the two documents and could not accumulate impact to result in a sustainable change.

4.3. Usage of instruments introduced by the Council Recommendation

The NRSF misses some of the main options proposed by the European Commission and the Council of the EU. It practically does not include the topics of combating antigypsyism and promoting Roma participation. Despite the proposal of the European Commission for the fight against antigypsyism to be not only a horizontal priority but also 'a stand-alone focus' in the countries with large Roma populations, the NRCP denied the proposal of Roma NGOs to have a specific chapter 'Fight against Antigypsyism' in the NRSF. Only nominally, a chapter on 'Equality of the Roma Women' is included: the chapter itself does not contain specific goals and activities, despite the many suggestions made. It is not clear what the reasons are for these new moments in the European framework not to find a place in the Bulgarian NRSF.

The EU Roma Strategic Framework sets nine commitments to every NRSF. In addition, the Commission proposes others, depending on the national context:

- (a) *National quantitative and qualitative targets for all seven EU objectives and related targets (depending on available data):* the Bulgarian NRSF meets this suggestion through a specific appendix included as part XII. 'Indicators for Monitoring the Implementation of the NSRF'.
- (b) *How EU and national funds, and financial instruments will be invested to support the Roma:* in general, this is not included in the NRSF. The Action Plan contains measures financed by the present Operational Programmes. It also contains information on how the next Human Resources Development Programme will support the implementation of the NRSF. Nevertheless, the information about the other ESF co-funded programme in Education and the programmes financed by the ERDF and the European Agricultural Fund for Rural Development is missing. Amalipe Centre and other Roma organisations have proposed a special appendix on the usage of EU funds/EEA/Swiss Contribution and national funds for funding NRSF implementation, but this proposal was not accepted.
- (c) *How institutional or administrative reforms will contribute to equality and inclusion:* it is not included in the NRSF.

Countries with large Roma populations, i.e., more than 1%, have also been suggested to include in their national strategic frameworks for Roma general additional commitments:

- (a) *Contain a plan or set of measures to prevent and combat antigypsyism and discrimination, segregation in education and housing, and Roma prejudice and*

stereotypes (including online): such a plan has not been prepared although Roma NGOs insisted on it.

- (b) *Integrate aspects of Roma equality and inclusion at the regional and local levels:* one of the assets of the Bulgarian NRSF is the requirement for all municipalities to prepare and approve municipal Roma integration plans. In July 2021, the NCP initiated a process of preparing district strategies and municipal action plans (although the national NRSF had not been approved yet). This process is ongoing at present;
- (c) *Indicate how national and EU funds, and financial instruments will be invested in reforming common policies to include Roma issues and target actions:* it is not included in the Bulgarian NRSF.

5. ADDITIONAL FINDINGS

The new Bulgarian NSRF steps back from important achievements compared to the previous one, such as the approval by an act of the National Parliament. Although Roma organisations have insisted on this until the last moment, the government did not propose the NRSF to the National Assembly. The formal argument is that the 'National Development Programme: Bulgaria 2030' was approved only by an act of the Council of Ministers.

This has both a symbolic value (shows a deterioration in the already weak political will for Roma policies), but also certain practical dimensions. For example, the new NRSF may be amended or even abolished at each subsequent meeting of the Council of Ministers. It is difficult to engage institutions outside of the national executive power, such as municipalities, the Commission for Protection against Discrimination, the National Ombudsman, and many others, within the NRSF implementation.

CONCLUSIONS AND RECOMMENDATIONS

The new Bulgarian NRSF is a modest step forward in several directions when compared to the previous NRIS:

- It contains a stronger analytical part.
- The problems of Roma women, children and youth are partly included in the analysis and some of the priorities. A specific chapter 'Empowerment of Roma Women' is introduced (although poorly developed);
- There are some integrated measures and better cohesion between the objectives and planned interventions, designed by different public institutions;
- There is continuity in some measures: such as health and educational mediation and attempts of improvement in others (for example, social housing and social services as a whole).

At the same time, the new NRSF has significant weaknesses, as follows:

- It was prepared through a controversial consultative process;
- The aims and measures included are predominantly general actions that have been used in the previous NRIS or are currently in use anyway.
- There are only a few measures that contribute to mainstreaming policies by enriching them with Roma-related aspects;
- The Bulgarian document includes only part of the opportunities provided by the EU Roma Framework. It practically does not include the topics of combating antigypsyism and promoting Roma participation. Only nominally, a chapter on 'Equality of the Roma Women; is included. The instruments proposed in the Council Recommendations from 12 March 2021 are only partly used;
- It steps back from the important achievements of the previous one – approval by an act of the National Parliament.

Recommendations to national authorities

1. To prepare and approve, in close cooperation with the Roma and pro-Roma civil society, annexes to the NRSF: "Plan with measures to combat antigypsyism, discrimination, segregation in education, anti-Roma stereotypes and prejudices" and "Annex with planned operations to support the implementation of the NRSF";
2. To analyse the coherence of the NRSF with the other national strategic documents, the Partnership Agreement and the National Recovery and Resilience Plan;
3. To detail the commitment to build administrative capacity, ensuring the implementation of the NRSF;
4. To add in the Action Plan a special section for supporting the institutional development and the capacity of civil society organisations to cooperate in the implementation of the NRSF and the local action plans. In addition, to provide support for the establishment of umbrella Roma and pro-Roma organisations, including financial support and further capacity building and empowerment;
5. To develop a plan for avoiding and eliminating the risks before the implementation of the NRSF;
6. To delegate to CSOs the implementation of certain activities and the funds necessary for this;

7. To reform the National Council for Cooperation on Ethnic and Integration Issues considering the suggestions from Roma and pro-Roma civil society and ensuring the real participation of high-level political figures (ministers);
8. Reform and empower the National Roma Platform to ensure the participation of a broader set of Roma and pro-Roma NGOs, and stronger cooperation with the other stakeholders. Make use of the entire set of the Council Recommendations regarding the cooperation of the NRCP, NRP, Roma civil society and equality bodies (including the Ombudsman) to monitor and report on discrimination, public awareness raising and of functionaries, provide training, free legal aid;
9. Create opportunities for recruiting Roma for the National Roma Contact Point;
10. To organise the capacity building of their staff regarding the strategic planning, monitoring, and evaluation, as well as regarding the Roma community and how to avoid anti-Roma stereotypes, prejudices and hate speech;
11. To commission targeted population mapping of vulnerable Roma communities, and follow up on their findings to inform and support further policy-making and implementation of the NRSF;
12. Improve the System for Monitoring, Evaluation, and Control of the Roma Contact Point to improve the collection of equality data, properly safeguarded, desegregated and anonymised, and used systematically to support inclusion policies and implementation of the NRSF.
13. To adopt the NRSF by decision of the National Parliament.

Recommendations to European institutions

14. To closely monitor the implementation of the Bulgarian NRSF encouraging stronger political attention, better involvement of civil society, and the usage of EU funds for Roma-related policies;
15. To support the institutional development and capacity of Roma and pro-Roma civil society through the 'Citizens, Equality, Rights and Values Programme' (CERV) of DG Justice and other similar programmes. To expand the funding of the national CSOs through RCM initiatives after 2025;
16. To encourage the usage of EU funds through the national programmes (especially programmes for Education, Human Resources Development, Regions in Growth and Rural Areas Development Programme), including through calls for proposals opened to CSOs.

Recommendations to the civil society

17. To strengthen the cooperation and advocacy at national and local levels, including through establishing umbrella organisation/coalition;
18. To organise the capacity building of their staff regarding strategic planning, monitoring, and evaluation, as well as regarding individual rights and how to respect them.
19. Advocate for and participate in reforming, building up, and strengthening the National Roma Platform.

Recommendations to municipalities

20. To prepare municipal Roma inclusion plans in close cooperation with the local Roma communities;
21. To increase the budget and human resources of the municipal and regional councils on ethnic and integration issues, so these structures could work more efficiently;

To target and actively involve local organisations and field workers in the implementation of the municipal Roma integration plans delegating activities and budget.

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List of interviews

List of conducted focus groups and interviews:

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 - a. Boyka Tsoleva, Ministry of Labour and Social Policy, Expert.
 - b. Silva Hacheryan, Ministry of Culture, Expert.
 - c. Desislava Teodosieva, Ministry of Youth and Sports, Expert.
 - d. Plamen Petrov, Ministry of Regional Development and Public Works, Expert.
 - e. Ivo Ivanov, Employment Agency, Expert.
 - f. Poly Hristova, Commission for Protection against Discrimination, Expert.
2. Conducted interviews with representatives of institutions:
 - a. Rositsa Ivanova, Secretary of the National Council for Cooperation on Ethnic and Integration Issues/National Contact Point.
 - b. Monica Cheuz, Director of Health Directorate, Sofia Municipality.
 - c. Sabie Hodzheva, Head of the Education Department of Sevlievo Municipality.
 - d. Reni Maleva, Deputy Mayor of Maglizh Municipality.
 - e. Tatiana Stoyanova, Head of the Department of Culture and Humanitarian Activities, Tundzha Municipality.
 - f. Boyka Georgieva, member of the local commission for combating anti-social behavior of minors, Krasna Polyana Municipality, Sofia.
3. Focus groups with non-governmental organisations working at national level, 27 April 2022:
 - a. Deyan Kolev, Amalipe Centre.
 - b. Gancho Iliev, World without Borders.
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 - d. Nikolay Bliznakov, IndiRoma Foundation.
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 - a. Kina Assenova, Asthma Patients Foundation, Yambol.
 - b. Nikolay Nikolov, The Faithful Guardian.
 - c. Atanas Atanasov, Amalipe Centre.
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ANNEX: LIST OF PROBLEMS AND CONDITIONS

Fighting antigypsyism and discrimination

| Problems and conditions: | Significance: | Identified by the strategy: | Measures to address: | Targets defined: |
|--|----------------------|---|--|-------------------------------|
| Antigypsyism not recognised as a specific problem in national policy frameworks | minor problems | understood with limitations | adequate but with room for improvement | relevant targets well defined |
| Prejudice against Roma | significant problems | understood with limitations | present but insufficient | relevant targets well defined |
| Hate crimes against Roma | significant problems | understood with limitations | present but insufficient | relevant targets well defined |
| Hate speech towards and against Roma (Online and offline) | significant problems | understood with limitations | present but insufficient | some targets but not relevant |
| Weak effectiveness of protection from discrimination ¹⁰ | significant problems | mentioned but not analysed sufficiently | present but insufficient | some targets but not relevant |
| Segregation in education, housing, or provision of public services | significant problems | mentioned but not analysed sufficiently | present but insufficient | some targets but not relevant |
| Forced evictions and demolitions leading to homelessness, inadequate housing, and social exclusion | significant problems | mentioned but not analysed sufficiently | adequate but with room for improvement | some targets but not relevant |
| Statelessness, missing ID documents | significant problems | mentioned but not analysed sufficiently | present but insufficient | some targets but not relevant |
| Misconduct and discriminatory behaviour by police (under-policing/under-policing) | significant problems | mentioned but not analysed sufficiently | present but insufficient | some targets but not relevant |
| Barriers to de facto exercise of EU right to free movement | minor problems | identified and analysed sufficiently | present but insufficient | relevant targets well defined |

Education

| Problems and conditions: | Significance: | Identified by Strategy: | Measures to address: | Targets defined: |
|---|----------------------|---|--|--|
| Lack of available and accessible pre-school education and ECEC services for Roma | Significant problems | Identified and analysed sufficiently | Present but insufficient | Adequate but with room for improvement |
| Lower quality of pre-school education and ECEC services for Roma | Significant problems | Mentioned but not analysed sufficiently | Present but insufficient | Absent |
| High drop-out rate before completion of primary education | Minor problems | Identified and analysed sufficiently | Adequate but with room for improvement | Adequate but with room for improvement |
| Early leaving from secondary education | Significant problems | Identified and analysed sufficiently | Adequate but with room for improvement | Adequate but with room for improvement |
| Secondary education/vocational training disconnected from labour market needs | Significant problems | Mentioned but not analysed sufficiently | Absent | Absent |
| Misplacement of Roma pupils into special education | Irrelevant | Irrelevant | Absent | Absent |
| Education segregation of Roma pupils | Critical problems | Identified and analysed sufficiently | Adequate but with room for improvement | Some targets but not relevant |
| Increased selectivity of the educational system resulting in concentration of Roma or other disadvantaged pupils in educational facilities of lower quality | Significant problems | Understood with limitations | Present but insufficient | Absent |
| Limited access to second-chance education, adult education, and lifelong learning | Significant problems | Understood with limitations | Present but insufficient | Absent |
| Limited access to and support for online and distance learning if education and training institutions close, as occurred during the coronavirus pandemic | Significant problems | Mentioned but not analysed sufficiently | Absent | Absent |

| | | | | |
|--|----------------------|---|--------------------------|-------------------------------|
| Low level of digital skills and competences and limited opportunities for their development among pupils | Significant problems | Mentioned but not analysed sufficiently | Absent | Absent |
| Low level of digital skills and competences and limited opportunities for their development among adults | Significant problems | Understood with limitations | Absent | Absent |
| Lack of intercultural education | Significant problems | Identified and analysed sufficiently | Present but insufficient | Some targets but not relevant |

Employment

| Problems and conditions | Significance: | Identified by the strategy: | Measures to address: | Targets defined: |
|--|----------------------|---------------------------------------|--|--|
| Poor access to or low effectiveness of public employment services | Significant problems | Mention but not analysed sufficiently | Present but insufficient | Absent |
| Youth not in employment, education or training (NEET) | Significant problems | Understood with limitation | Adequate but with room for improvement | Adequate but with room for improvement |
| Poor access to (re-) training, lifelong learning and skills development | Significant problems | Mention but not analysed sufficiently | Adequate but with room for improvement | Some targets but not relevant |
| Discrimination on the labour market by employers | Significant problems | Mention but not analysed sufficiently | Absent | Absent |
| Risk for Roma women and girls from disadvantaged areas of being subjected to trafficking and forced prostitution | Significant problems | Understood with limitation | Adequate but with room for improvement | Some targets but not relevant |
| Primary labour market opportunities substituted by public work | Significant problems | Understood with limitation | Adequate but with room for improvement | Some targets but not relevant |
| Barriers and disincentives to employment (such as indebtedness, low income from work compared to social income) | Significant problems | Mention but not analysed sufficiently | Absent | Absent |

| | | | | |
|---|----------------|----------------------------|--|-------------------------------|
| Lack of activation measures, employment support | Minor problems | Understood with limitation | Adequate but with room for improvement | Some targets but not relevant |
|---|----------------|----------------------------|--|-------------------------------|

Healthcare

| Problems and conditions: | Significance: | Identified by the strategy: | Measures to address | Targets defined: |
|---|--|---|----------------------------|--|
| Exclusion from public health insurance coverage (including those who are stateless, third country nationals, or EU- mobile) | Significant problems | Understood with limitations | Present but insufficient | Some targets but Not relevant |
| Poor supply/availability of healthcare services (including lack of means to cover out-of- pocket health costs) | Significant problems | Mentioned but not analysed sufficiently | Present but insufficient | Adequate but with room for improvement |
| Limited access to emergency care | Significant problems | Not mentioned | | |
| Limited access to primary care | Significant problems | Not mentioned | | |
| Limited access to prenatal and postnatal care | Critical problems | Mentioned but not analysed sufficiently | Present but insufficient | Adequate but with room for improvement |
| Limited access to health-related information | Minor problems | Mentioned but not analysed sufficiently | Present but insufficient | Adequate but with room for improvement |
| Poor access to preventive care (vaccination, check-ups, screenings, awareness-raising about healthy lifestyles) | Significant problems | Mentioned but not analysed sufficiently | Present but insufficient | Adequate but with room for improvement |
| Poor access to sexual/reproductive healthcare and family planning services | Significant problems | Not mentioned | | |
| Specific barriers to better healthcare of vulnerable groups such as elderly Roma people, Roma with disabilities, LGBTI and others | Significant problems | Not mentioned | | |
| Discrimination/ antigypsyism in healthcare (e.g., segregated services, forced sterilisation) | Significant problems (segregated services) | Not mentioned | | |
| Unrecognised historical injustices, such as forced sterilisation | Irrelevant | | | |

| | | | | |
|--|----------------------|---|--------------------------|-------------------------------|
| Inequalities in measures for combating and preventing potential outbreaks of diseases in marginalised or remote localities | Significant problems | Mentioned but not analysed sufficiently | Present but insufficient | Some targets but not relevant |
|--|----------------------|---|--------------------------|-------------------------------|

Housing, essential services, and environmental justice

| Problems and conditions: | Significance: | Identified by the strategy: | Measures to address: | Targets defined: |
|--|----------------------|---|-----------------------------|-------------------------------|
| Poor physical security of housing (ruined or slum housing) | Significant problems | Mentioned but not analysed sufficiently | Absent | Absent |
| Lack of access to drinking water | Significant problems | Mentioned but not analysed sufficiently | Absent | Absent |
| Lack of access to sanitation | Significant problems | Irrelevant | Absent | Absent |
| Lack of access to electricity | Significant problems | Irrelevant | Absent | Absent |
| Limited or absent public waste collection | Significant problems | Irrelevant | Absent | Absent |
| Restricted heating capability (families unable to heat all rooms/all times when necessary) or solid waste used for heating | Significant problems | Mentioned but not analysed sufficiently | Absent | Absent |
| Lack of security of tenure (legal titles are not clear and secure) | Significant problems | Irrelevant | Absent | Absent |
| Lacking or limited access to social housing | Critical problems | Mentioned but not analysed sufficiently | Present but insufficient | Some targets but not relevant |
| Overcrowding (available space/room for families) | Significant problems | Irrelevant | Absent | Absent |
| Housing-related indebtedness at levels which may cause eviction | Critical problems | Irrelevant | Absent | Absent |
| Housing in segregated settlements/ neighbourhoods | Critical problems | Mentioned but not analysed sufficiently | Absent | Absent |
| Housing in informal or illegal settlements/ neighbourhoods | Critical problems | Mentioned but not analysed sufficiently | Absent | Absent |
| Exposure to hazardous factors | Minor problems | Irrelevant | Absent | Absent |

| | | | | |
|---|----------------------|---|--------|--------|
| (living in areas prone to natural disasters or environmentally hazardous areas) | | | | |
| Limited or lacking access to public transport | Significant problems | Irrelevant | Absent | Absent |
| Limited or lacking internet access (e.g., public internet access points in deprived areas, areas not covered by broadband internet) | Minor problems | Irrelevant | Absent | Absent |
| Limited or lacking access to green spaces | Significant problems | Irrelevant | Absent | Absent |
| Roma excluded from environmental democracy | Minor problems | Irrelevant | Absent | Absent |
| Roma exposed to forced evictions due to unlawfulness of the constructions | Critical problems | Irrelevant | Absent | Absent |
| Lack of assessment of proportionality of measures in the course of forced evictions | Critical problems | Mentioned but not analysed sufficiently | Absent | Absent |

Social protection

| Problems and conditions: | Significance: | Identified by the strategy: | Measures to address: | Targets defined: |
|--|----------------------|---|-----------------------------|-------------------------------|
| High at-risk-of-poverty rate and material and social deprivation | Absent | Mentioned but not analysed sufficiently | Present but insufficient | Some targets but not relevant |
| Income support programmes fail to guarantee an acceptable level of minimum income for every household | Significant problems | Mentioned but not analysed sufficiently | Present but insufficient | Absent |
| Limited access to income support schemes (low awareness, barrier of administrative burdens, stigma attached) | Significant problems | Mentioned but not analysed sufficiently | Absent | Absent |
| Ineffective eligibility rules (well-designed | Significant problems | Mentioned but not analysed sufficiently | Absent | Some targets but not relevant |

| | | | | |
|--|----------------------|---|--------------------------|-------------------------------|
| means-testing ensures that those who need support can get it; job-search conditions ensure the motivation for returning to work) | | | | |
| Low flexibility of income support programmes for addressing changing conditions of the household | Significant problems | Mentioned but not analysed sufficiently | Present but insufficient | Some targets but not relevant |
| Discrimination by agencies managing income-support programmes | Significant problems | Mentioned but not analysed sufficiently | Absent | Absent |
| Risk of municipalities misusing income support to buy votes | Minor problems | Mentioned but not analysed sufficiently | Absent | Absent |

Social services

| Problems and conditions: | Significance: | Identified by the strategy: | Measures to address: | Targets defined: |
|---|----------------------|---|-----------------------------|-------------------------------|
| High at-risk-of-poverty rate and material and social deprivation | Critical problems | Mentioned but not analysed sufficiently | Absent | Absent |
| Income support programmes fail to guarantee an acceptable level of minimum income for every household | Significant problems | Irrelevant | Absent | Absent |
| Limited access to income support schemes (low awareness, barrier of administration burdens, stigma attached) | Significant problems | Mentioned but not analysed sufficiently | Present but insufficient | Some targets but not relevant |
| Ineffective eligibility rules (well-designed means-testing ensures that those who need support can get it; job-search conditions ensure the motivation for returning to work) | Significant problems | Irrelevant | Absent | Absent |
| Low flexibility of income support programmes for | Significant problems | Mentioned but not analysed sufficiently | Present but insufficient | Absent |

| | | | | |
|---|----------------------|---|--------------------------|-------------------------------|
| addressing changing conditions of the household | | | | |
| Discrimination by agencies managing Income-support programmes | Significant problems | Mentioned but not analysed sufficiently | Present but insufficient | Some targets but not relevant |
| Risk of municipalities misusing Income support to buy votes | Significant problems | Irrelevant | Absent | Absent |

Child protection

| Problems and conditions: | Significance: | Identified by the strategy: | Measures to address: | Targets defined: |
|--|-----------------------|---|--|--|
| Child protection not considered in the NRSF | Significant problems | Understood with limitations | Present but insufficient | Some targets but not relevant |
| Specific vulnerability of Romani children as victims of violence not considered | Critical problems | Mentioned but not analysed sufficiently | Present but insufficient | Some targets but not relevant |
| Segregated or discriminatory child-protection services provided to Roma | Significant problems, | Understood with limitations | Present but insufficient | Adequate but with room for improvement |
| Activities aimed at strengthening parental responsibility and skills not available or not reaching out to Roma parents | Significant problems | Understood with limitations | Adequate but with room for improvement | Adequate but with room for improvement |
| Illegal practices of child labour | Significant problems | Mentioned but not analysed sufficiently | Present but insufficient | Some targets but not relevant |
| Large-scale and discriminatory placement of Romani children in early childhood care institutions | Critical problems | Irrelevant | Present but insufficient | Some targets but not relevant |
| Persistence of large-scale institutions rather than family-type arrangements | Significant problem | Irrelevant | Present but insufficient | Some targets but not relevant |
| Early marriages | Critical problem | Mentioned but not analysed sufficiently | Present but insufficient | Adequate but with room for improvement |

| | | | | |
|--|----------------------|---|--------------------------|--|
| Barriers to children's registration; statelessness | Significant problems | Mentioned but not analysed sufficiently | Present but insufficient | Some targets but not relevant |
| Biased treatment of Roma youth by security and law enforcement | Critical problem | Mentioned but not analysed sufficiently | Present but insufficient | Some targets but not relevant |
| Inadequate child/adolescent participation | Significant problem | Mentioned but not analysed sufficiently | Present but insufficient | Adequate but with room for improvement |

Promoting (awareness of) Roma arts, culture, and history

| Problems and conditions: | Significance: | Identified by the strategy: | Measures to address: | Targets defined: |
|---|----------------------|---|-----------------------------|-------------------------|
| Poor or lacking awareness of the general population of the contribution of Roma art and culture to national and European heritage | Critical problems | Mentioned but not analysed sufficiently | Absent | Absent |
| Exclusion of Roma communities from national cultural narratives | Significant problem | Mentioned but not analysed sufficiently | Absent | Absent |
| Romani history and culture not included in school curricula and textbooks for both Roma and non-Roma students | Significant problem | Mentioned but not analysed sufficiently | Present but insufficient | Absent |
| Lack of inclusion of Romani language in schools, and development of necessary educational materials and resources for Romani language preservation and teaching | Significant problem | Mentioned but not analysed sufficiently | Absent | Absent |
| Lack of memorialisation of Roma history through establishing monuments, commemorative activities, and institutionalizing dates relevant to Roma history | Significant problem | Mentioned but not analysed sufficiently | Absent | Absent |

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