



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

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June 2025

*Justice
and Consumers*



EUROPEAN COMMISSION

Directorate-General for Justice and Consumers
Directorate D — Equality and Non-Discrimination
Unit D2 Non-Discrimination and Roma Coordination

*European Commission
B-1049 Brussels*

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of the national strategic framework
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Manuscript completed in June 2025

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PDF	ISBN 978-92-68-30332-0	doi:10.2838/0717595	Catalogue number DS-01-25-142-EN-N
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How to cite this report:

Roma Civil Monitor (2025) *Civil society monitoring report on the implementation of the national strategic framework for Roma equality, inclusion, and participation in Bulgaria*. Publications Office of the European Union, Luxembourg.

Luxembourg: Publications Office of the European Union, 2025

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The report was prepared as part of the initiative '[**Preparatory Action – Roma Civil Monitoring – Strengthening capacity and involvement of Roma and pro-Roma civil society in policy monitoring and review**](#)' implemented by a consortium led by the Democracy Institute of Central European University (DI/CEU), including the European Roma Grassroots Organisations Network (ERGO Network), the Fundación Secretariado Gitano (FSG) and the European Roma Rights Centre (ERRC). The initiative was funded by the European Commission's Directorate-General Justice and Consumers (DG Just) under service contract no. JUST/2020/RPAA/PR/EQUA/0095.

The report represents the findings of the authors, and it does not necessarily reflect the views of the consortium or the European Commission who cannot be held responsible for any use which may be made of the information contained herein.

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LIST OF ABBREVIATIONS

BGN	Bulgarian Lev (currency)
CEICSEM	Centre for Educational Integration of Children and Students from Ethnic Minorities
CERD	Committee on the Elimination of Racial Discrimination
CLLD	Community-Led Local Development
CSO	Civil Society Organisation
CPD	Commission for Protection against Discrimination
CPL	Child Protection Law
DPCEI	Department for Prevention and Protection from Domestic Violence, Cooperation on Ethnic and Integration Issues, and Interaction with Civil Society
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
EP	Education Programme (2021-2027)
ERDF	European Regional Development Fund
ESF	European Social Fund
ESIF	European Structural and Investment Funds
EU SILC	EU Statistics on Income and Living Conditions
EURSF	EU Roma Strategic Framework
FRA	EU Agency for Fundamental Rights
ITI	Integrated Territorial Investment
HRDOP	Human Resources Development Operational Programme (2014-2020)
HRDP	Human Resources Development Program (2021-2027)
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
NEET	Not in Education, Employment, or Training (young person)
NRCP	National Roma Contact Point
NRIS	National Roma Integration Strategy (2012-2020)
NRSF	National Roma Strategic Framework (2022-2030)
NSI	National Statistical Institute
OECD	Organisation for Economic Cooperation and Development
OSCE	Organisation for Security and Co-operation in Europe
RCM	Roma Civil Monitor
RDOP	Regions in Growth Operational Programme (2014-2020)
RDP	Regional Development Program (2021-2027)
REF	Roma Education Fund
SAA	Social Assistance Act
SSA	Social Services Act
SESGOP	Science and Education for Smart Growth Operational Programme (2014-2020)
TSA	Trust for Social Achievement

EXECUTIVE SUMMARY

In practical terms, the implementation of the Bulgarian National Roma Strategic Framework (NRSF) has progressed in a limited manner. Changes in the NRCP were introduced, but they did not strengthen its limited mandate, responsibilities and human capacity. The regulatory power of the new strategy remains significantly less than is required, even compared to the previous one. The current NRSF was approved only by a ministerial decision and, therefore, did not involve a wider range of institutions (such as municipalities, the Commission for Protection against Discrimination (CPD) and others that are not part of the Council of Ministers). The added value of the new NRSF Action Plan is also low; it mainly includes activities that have already been implemented and does not prescribe new ones. Roma participation in the overall implementation, monitoring and evaluation is very limited. A worrying trend is the increase in hate speech against civil society and restrictive legislation in this respect.

Positive developments during the period under review are the establishment of the profession of educational mediator and its funding by the state budget, the beginning of the institutional reform of the NRCP, the expansion of obstetric procedures, as well as the serious involvement of European funds (especially ESF+ funded programmes). This is largely due to the advocacy of Roma organisations and the support of the European Commission.

Serious challenges remain in terms of discrimination and hate speech against Roma, segregation in education, housing and the large proportion of uninsured Roma.

Implementation of the NRSF

The main developments in the implementation of the NRSF indicate structural changes but limited practical progress. The establishment of a new department responsible, among other agendas, for 'cooperation in ethnic and integration issues' under the Council of Ministers aims at the better coordination of integration policies but is not leading to significant improvements in the work of the National Council for Cooperation on Ethnic and Integration Issues (NCCEII), which remains rather ineffective and resource-limited.

The new 'National Action Plan 2024–2027' repeats previous measures without an in-depth assessment of their impact so far. Compared to the huge challenges, limited results have been achieved in education, employment, healthcare and housing policy, with continued segregation, high unemployment, limited access to healthcare services and insufficient support for Roma civil society.

The lack of significant results from the implementation of the NRSF is noted in each successive EC staff working report for Bulgaria. There is also no information on measures taken in response to most of the recommendations in the Roma Civil Monitor reports. The inclusion of Roma in monitoring and management processes remains tokenistic, and local authorities often do not take responsibility for integration measures. An integrated approach, enhanced coordination and better funding are needed for the effective implementation of the NRSF, especially in the area of housing policy.

Review of the country situation by policy area

Antigypsyism and Discrimination: There is an obvious lack of political will to fight antigypsyism and discrimination. There is a continuous absence of measures that address hate speech and hate crimes in both the NRSF and the National Action Plan, as in the previous reports. The concept of 'antigypsyism' is only mentioned (not explicitly but in an indirect descriptive way), but no concrete measures are defined. Additionally, Bulgaria lacks a unified institutional source for hate crime and antigypsyism statistics. The NRSF relies on self-reported data from a perception survey on discrimination conducted by the National Statistical Institute (NSI), without sufficiently explaining why this is considered the sole reliable data source. Other credible sources, such as the Ministry of Interior (which has data on hate crime cases and police investigations), the Chief Prosecutor's Office (providing figures on hate crime proceedings, including Roma-related cases), the Ministry of Justice (detailing the proportion of Roma involved in court procedures and in detention), and the Antidiscrimination Commission (with information on submitted cases), are not referenced but should be considered. A significant weakness of the NRSF is the absence of plans to collect additional Roma-sensitive statistics related to anti-discrimination efforts. Here, one of the main problems is the 'self-determination' of Roma – i.e., when such incidents or cases of discrimination are reported, many Roma do not identify themselves as Roma. As a result, the overall level of reporting of such problems to the designated institutions is low. The role of CSOs and their

interaction with local authorities in assisting the victims is very important because they can encourage the victims to report their cases and can help them prepare their statements. In addition, there are large differences in the levels of discrimination and how it is dealt with depending on the region and the local characteristics of the population and the policy of the local administration.

Education: Bulgaria has achieved some progress in Roma inclusion according to several mainstream measures. All public kindergartens and nurseries have been free of charge since 2022, which helps Roma households living in poverty. Preschool for children aged four and above is obligatory, and there is a place for every child. This helps overcome the non-enrolment discrimination observed earlier. All textbooks for all school grades are free, which also helps children in poverty. As a Roma-targeted measure, the role of educational mediators has increased, and by December 2023, there were 1,184 mediators attached to municipal schools. However, a new challenge in the educational system appeared with the free movement of people within the EU. There are no recent, reliable data on school dropout, and therefore, there are discrepancies and reasonable doubts about the data on net enrolment rates that are published by the NSI and the Ministry of Education. The educational segregation of Roma children – either in ‘unofficial’ Roma schools or in segregated Roma classes in non-segregated kindergartens and schools – still persists in most municipalities.

Employment: The NRSF reiterates previous employment objectives without addressing key structural issues. While it includes mainstream measures specific to diverse groups such as women, not in employment, education or training (NEET) youth, and the elderly, it overlooks critical areas like poor working conditions, labour exploitation, the grey economy, and the integration of circular migrants. Ethnic data collection remains limited to local labour offices, but underreporting persists due to fear of discrimination. In 2023, 27,141 Roma were registered as unemployed on an average monthly basis – up 10% from 2022, marking a rise four times steeper than the general rise in unemployment. Despite this increase, figures remain lower than during the 2020 COVID-19 lockdown peak.

Healthcare: The systematic issues observed in the previous RCM monitoring reports¹ are still present, and the challenges have even intensified. Firstly, there is no universal healthcare coverage, and due to social and economic inequalities, Roma people – especially those living in remote rural areas – have limited access to medical services. Secondly, barriers to accessing healthcare services arise due to the lack of identity papers, 30-40% seasonal unemployment, and shrinking medical personnel in some regions. Significant progress was made through a mainstreamed measure: since 2023, up to four preventive examinations during pregnancy for every uninsured woman are provided. Following the monitoring recommendations from the pre-COVID reports, the Ministry of Health is currently piloting a new approach towards health mediation in seven municipalities, where health mediators are employed directly as hospital staff, so that they assist not only the residents of a particular neighbourhood but anyone in need of healthcare mediation. The training class of 2024 (about 34 health mediators) are specifically certified to work in maternity and paediatric departments of hospitals.

Housing: The forced evictions of Roma from their only homes remain one of the most serious human rights violations in Bulgaria. There is a systematic failure of Bulgarian courts and public administration to recognise discrimination in this respect. There are 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 constitutional law, nor is it recognised in any normative acts. The country has no current national housing policy regulated in a strategic document, and it lacks uniform legislation to regulate public engagement in the provision of housing. On the positive side, in 2024, a long-term problem concerning the lack of official addresses of people in informal housing was resolved.

Social Protection: Bulgaria’s social protection system covers areas such as sickness, disability, old age, and social exclusion – the latter supporting those in poverty via municipal-level programs like food and heating assistance. From 2018 to 2022, funding for social exclusion ranged between 1.3% and 1.6% of the total social protection budget, peaking in 2021 due to post-COVID vulnerabilities. Although no measures specifically target Roma communities, experts note that, along with rural elders, Roma are key beneficiaries. Access to these services depends heavily on ID cards and registered addresses.

Social Services: Bulgaria’s Social Services Act (SSA), effective since July 2020, mainstreams services without explicitly naming minority groups like Roma or migrants. In practice, social services remain largely inaccessible

¹ Available at: <https://www.romacivilmonitoring.eu/countries/bulgaria/>

to the most marginalised – particularly Roma in informal settlements – due to a lack of residence registration and personal documents. Social service planning relies mainly on Census 2021 data, excluding unregistered informal dwellings, further limiting access. Local needs assessments and social mapping lack targeted measures for Roma or impoverished neighbourhoods.

Child Protection: The child protection system of Bulgaria remains reactive, focusing more on addressing abandonment and promoting alternatives to institutional care than on strengthening families. Coordination between services is weak, and while anti-discrimination laws exist, some social benefits are denied to families whose children are unvaccinated or not in school – disproportionately affecting vulnerable groups like the Roma. Romani children are overrepresented in state care, often placed there due to poverty and lack of support, with related decisions frequently made before or just after birth. Stereotypes hinder their acceptance in foster care. Preventive policies are underdeveloped, especially regarding early marriages in Roma communities. Though a 2023 national programme acknowledges the issue, it lacks real community outreach, legal enforcement, or targeted funding. Additionally, sex education efforts are undermined by legal changes limiting classroom discussions on gender. The justice system also lacks child-sensitive procedures, with few trained specialists. Stronger family support, Roma-inclusive policies, and child-focused judicial reforms are urgently needed to prevent unnecessary separations.

Roma Art and Culture: No real targeted measures aimed at the Romani culture have been defined. This remains the least developed chapter in the NRSF, and the administrative reports of the Ministry of Culture are composed of misleading information and hollow phrases. Officially, all the measures are mainstreamed, and Roma performers and organisations have the right to compete. Since there is no Roma history museum, art gallery or permanent Romani culture exposition in any national or regional museum, this is a clear case of hidden structural discrimination. Roma CSOs have no capacity and infrastructure to compete with the state and municipal museums and galleries. 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. The ministry does not specify effective measures with a sustainable impact that would promote and encourage Romani culture and Romani artists.

Focus on key issues affecting Roma

Segregation in Education: Educational segregation remains a major barrier for Roma children, with nearly half of Roma children attending predominantly Roma schools. Despite political support for full school enrolment, desegregation is not prioritised and often meets resistance. NRSF outlines the challenges but avoids using the term ‘desegregation’, and its action plans repeat the limited, underfunded measures from previous years. Although the Education Programme (co-funded by the EU) allocates over 14 million EUR for desegregation efforts, these initiatives are not well-aligned with the NRSF. A small state-funded programme supports municipal desegregation, but its 250,000 EUR annual budget is insufficient. Roma CSOs have played a key role in advocating for desegregation and successfully integrated it into national education strategies and EU-funded programmes. However, gaps remain in coordination, funding, and policy implementation. Addressing both existing and secondary segregation requires stronger investment, consistent national-local policy alignment, and meaningful Roma participation at all stages of planning and execution.

Difficulties with Registration: Many Roma face serious obstacles in registering a permanent address, which prevents them from obtaining identity documents, essential for accessing healthcare, education, legal rights, and social services. As of 2021, over 244,000 people lacked valid identity documents, with half never having had one. The root cause is the restrictive legal and administrative requirements, such as needing proof of legal residence at an address listed in the National Classifier, which excludes many Roma homes due to their informal housing status. Municipal Address Registration Commissions are largely ineffective, and the affected individuals – often youth and women – lack the legal knowledge and resources to appeal. CSOs have long advocated for reform, and in October 2024, amendments to the Civil Registration Act allowed municipalities to register people at an *ex officio* address. Though the new policy has limitations, including municipalities’ refusal to manage official correspondence, it allows stateless individuals to finally receive ID documents and begin accessing their basic rights.

Healthcare: Roma communities face longstanding health disparities, including high rates of uninsured individuals, limited access to medical services, and low vaccination uptake. Positive developments include a growing number of Roma health professionals and improved awareness about health, partly influenced by the COVID-19 crisis. However, major challenges remain: mobile screening goals have not been met, vaccination campaigns lack intensity, and misinformation is widespread, contributing to the highest COVID-19 mortality in

the EU in Bulgaria. Discrimination, poverty, and limited health literacy further hinder healthcare access. Still, progress includes improved Roma registration with general practitioners (90%) and expanded rights and access to check-ups and tests for uninsured pregnant women, according to Ordinance 26/2007 on Provision of Obstetrical Care to Women Without Health Insurance. Roma CSOs have played a key role in shaping such policies, and health mediators continue to bridge gaps. National strategies and action plans show better alignment, but implementation and outreach, especially in marginalised communities, remain weak. Ongoing structural issues must be addressed to ensure equitable healthcare access for Roma populations.

Fighting Antigypsyism and Discrimination: The NRSF aims to reduce discrimination and promote Roma inclusion across all societal sectors. However, its implementation faces challenges due to political instability, economic crises, and external factors like the COVID-19 pandemic and the war in Ukraine. Structural and institutional discrimination persists, affecting Roma access to education, healthcare, housing, and employment. NRSF calls for targeted actions and local engagement, but practical efforts often lack depth and regional specificity. Delays in funding and institutional coordination are additional barriers to the NRSF's successful materialisation. Roma CSOs actively participate in strategy implementation and monitoring, though issues related to ethnic self-identification and nationalist rhetoric complicate effective representation. Strengthening local institutional cooperation and fostering inclusive dialogue are key to combating antigypsyism. More robust, actionable mechanisms – such as dedicated plans to fight against segregation – are recommended to enhance the strategy's impact.

Use of EU funding instruments

In Bulgaria, the ESF+ is the EU fund that supports Roma inclusion to the highest degree. Roma CSOs took an active part in the preparation of the main programmes, and their representatives are active participants in the respective Monitoring Committees. CSOs managed to advocate successfully for including Roma-related measures and indicators in the programmes. As a result, relatively large operations targeting Roma and other vulnerable groups have been announced, and certain mainstream projects also benefit from the implementation of NRSF. Both territorial approaches – Integrated Territorial Investment and Community-Led Local Development (ITI and CLLD) and national calls are engaged with the socio-economic integration of marginalised communities, such as the Roma.

The programmes address certain challenges: low interest in territorial approaches, barriers that limit CSO participation (improper application of 'state aid/de minimis' rules, etc.), lack of Roma-related institutions with the capacity to implement big/'systemic' projects, and others. Measures are urgently needed to overcome these challenges.

INTRODUCTION

National Roma Strategic Framework

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)². The document will not be voted on by the National Assembly, contrary to the previous National Roma Integration Strategy (NSRI) in 2012. This is a sign of a decrease in commitment to implementing Roma-related policy, as well as political instability. A practical consequence is that this makes it difficult to engage institutions outside of the national executive power, such as municipalities, the Commission for Protection against Discrimination (CPD), the Ombudsman, and many others, in the NRSF implementation. Last but not least, the NRSF can be easily dismissed or entirely changed by the decision of the next government. The adopted NRSF was followed by an Action Plan,³ approved with the same governmental decision. The NRSF envisions district and municipal strategies and plans being further developed to support their implementation. There are no deadlines or obligations for this.

The NRSF has not been updated or changed since its approval. Its Action Plan was updated for the period 2024-2027, approved by the Decision of the Council of Ministers 151/07.03.2024.⁴ Political crises and permanent government changes are preventing more profound changes.

The National Roma Contact Point (NRCP) reports on the NRSF implementation before the Council of Ministers through administrative reports. These are formally approved by the National Council for Cooperation on Ethnic and Integration Issues (NCCEII), which does not provide more public insight since the majority of Roma organisations left this structure in 2013 and 2017. The reporting system remains confined to the Council of Ministers' structures. The administrative reports are not available, even on the web-based System for Monitoring and Control of NRSF Implementation.⁵

About this report

The main purpose of this report is to support participatory and inclusive monitoring of the implementation of NRSF from its approval (May 2022) to the end of 2024. It concentrates on the progress (or lack of such) according to the key areas, the situation in every area, key issues affecting Roma, and the usage of EU funding instruments. The authors emphasise the effectiveness and Roma participation regarding each of these topics.

The report provides a concise assessment of the quality of the NRSF from the perspectives of Roma, civil society and experts who have participated (or refused to participate) in its development and implementation, comparing ex-post and ex-ante assessment. It provides a set of recommendations for improving the NRSF implementation in the remaining period.

The report is based on detailed field research that included:

- interviews and focus groups with main stakeholders, including Roma and pro-Roma civil society active at the national and local levels (nine organisations); the National Roma Contact Point; representatives of six ministries/ institutions with a mandate to coordinate the implementation of the main NRSF priorities; local authorities from five municipalities (three urban and two rural), Managing Authorities

² Council of Ministers 2022, National Strategy of the Republic of Bulgaria for Equality, Inclusion and Participation of the Roma 2022-2030. Available at: <https://www.strategy.bg/StrategicDocuments/View.aspx?lang=bg-BG&Id=1541>

³ Council of Ministers 2022 -2, Action Plan for the period 2022-23. Available at: <https://www.strategy.bg/StrategicDocuments/View.aspx?lang=bg-BG&Id=1541>

⁴ The document is available at: <https://www.strategy.bg/StrategicDocuments/View.aspx?lang=bg-BG&Id=1541>

⁵ The System for Monitoring and Control of the NRSF Implementation is maintained by the National Roma Contact Point and is available at <https://nrpcsystem.government.bg/SitePages/%D0%9D%D0%B0%D1%87%D0%B0%D0%BB%D0%BD%D0%B0%20%D1%81%D1%82%D1%80%D0%B0%D0%BD%D0%B8%D1%86%D0%B0.aspx>

and members of the Monitoring Committees of ESF+ and ERDF co-funded programmes (five): overall, 30.

- desk research covering the main documents: the NRSF, its Action Plan (for 2022-2023 and for 2024-2027), as well as the programme documents of EU co-funded programmes (Education Programme, Human Resources Development Programme and Regional Development Programme).

Additionally, certain topics were discussed with more than 100 educational mediators during their national meeting, held in Dryanovo in November 2024.

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

When organising the report development in 2024-2025, the authors followed the main principles from the previous RCM reports such as fostering Roma participation and developing the capacity of Roma and pro-Roma organisations to monitor the implementation of public policies and advocate for transparent, effective and efficient Roma-related policy, both at local and national levels. This is why they encouraged eight organisations to participate in the preparation of the report and made it possible for the opinions of dozens of local activists and field workers to be heard. The authors have strived to make the voices of Roma better heard through the report. Since the Roma community and movement are not homogeneous in social and ethnocultural terms, the partners aimed to coordinate these diverse voices and propose possible areas of harmony regarding specific key topics, rather than pretending there is unified agreement on every issue.

The authors of the report would like to thank all local activists, mediators, and representatives of field workers and various institutions who participated in the research. They not only gave their time but also their trust to the authors of the report and to the whole RCM consortium. This was particularly important at a time of political turbulence and increasing pressure on CSOs. The consortium and the authors of the report faced no such problems. On the contrary, they encountered trust and willingness to cooperate among all stakeholders.

1. IMPLEMENTATION OF THE NRSF

1.1. Key developments and effectiveness of implementation

At the end of 2023 within the administration of the Council of Ministers a new 'Department for Prevention and Protection from Domestic Violence, Cooperation on Ethnic and Integration Issues, and Interaction with Civil Society' (DPCEI) was created as a structural unit within the Administration of the Council of Ministers, positioning it at the highest level of executive power. Its main functions are related to the coordination of key government policies in three areas, one of which is cooperation on ethnic and integration issues. The expectation was that, in this way, these policies would be elevated to a higher level, leading to more effective implementation and enforcement.

With the establishment of this department, significant changes have occurred in the work of the National Council for Cooperation on Ethnic and Integration Issues (NCCEI). The former Secretariat of the NCCEI has been integrated into the new department's structure, and the secretary of the council is now the head of DPCEI.

Unfortunately, no significant positive changes in the work of the NCCEI have been observed so far. The NCCEI continues to function as a formal structure with a limited budget and human resources, which severely restricts its role in implementing the state's core social inclusion policies. Important civil society organisations, crucial for the development of the Roma community, remain outside the scope of the NCCEI. Since 2017, these organisations have withdrawn from the council in an effort to push for genuine, fundamental reform.⁶ Unfortunately, the demands of Roma civil society have not yet been met.

Information about the ongoing work of the NCCEI is highly limited. There are no permanent communication channels between the NCCEI and CSOs. The council's previous website has been shut down, and information about the NCCEI can now be found on the website of the NRSF's Monitoring and Control System.⁷ This site contains brief information about the NCCEI, the text of the NRSF, Action Plans, and administrative monitoring reports on the implementation of the NRSF.

1.1.1. Changes in the NRSF and Action Plan

Since the adoption of the NRSF, no significant changes have been made to the document's text. By Decision No. 278 of the Council of Ministers on 5 May 2022, a National Action Plan for the period 2022–2023⁸ was adopted, specifying and adapting measures for implementing the various priorities of the strategy. Upon the expiration of this plan, a new National Action Plan for 2024–2027⁹ was developed and adopted by Decision No. 151 of the Council of Ministers on 7 March 2024. This Action Plan will be valid until the end of 2027 and aims to ensure the effective implementation of the priorities outlined in the NRSF.

These priorities include:

- Education: Ensuring inclusive education and educational integration for children and students from vulnerable groups, including Roma.
- Healthcare: Improving access to healthcare services and raising health awareness within the Roma community.

⁶ At the beginning of 2016, nearly 50 CSOs and activists in the field of integration policy prepared a package of proposals from civil society organisations and citizens to increase the effectiveness of the NCCEI, which unfortunately were not addressed by the authorities and became a formal reason for the withdrawal of numerous civil society organisations from the NCCEI. Available at: https://www.equalopportunities.eu/images/pdf/Predlojenia_NS_Final.pdf

⁷ Monitoring and Control System is accessible at: <https://nrcpsystem.government.bg/SitePages/%D0%9D%D0%B0%D1%87%D0%B0%D0%BB%D0%BD%D0%B0%20%D1%81%D1%82%D1%80%D0%B0%D0%BD%D0%B8%D1%86%D0%B0.aspx>

⁸ Council of Ministers 2022, *National Action Plan for the period 2022–2023*. Available at: https://www.mon.bg/nfs/2022/11/roma-strategy_action-plan-2022-2024_11112022.pdf/

⁹ Council of Ministers 2024, *National Action Plan for the period 2024–2027*. Available at: <https://pris.government.bg/document/cec1bd2266dbcc462f7c275055f382d1/>

- Housing: Addressing housing issues by providing social housing and improving infrastructure in Roma neighbourhoods.
- Employment and Social Protection: Creating opportunities for employment and social integration through training and support for entrepreneurship.
- Combating Discrimination: Implementing measures to fight discrimination and promote equality and inclusion.

The Action Plan largely replicates the measures and activities of the previous plan without a comprehensive assessment of their implementation thus far.

To a great extent, the process of drafting the NRSF followed the European Commission's recommendations and the report published by the EC on January 9, 2023, which assessed the national strategic frameworks for Roma of the Member States. Within the European Union, particularly in the European Semester Reports, there is also an ongoing process of evaluation and recommendations for improving Roma integration policies. The main findings in these reports highlight that Bulgaria has yet to make sufficient progress in providing quality education for all children and ensuring adequate employment for representatives of vulnerable groups.¹⁰

Ambitious goals for the participation, consultation, and empowerment of Roma were defined during the development of the NRSF, but in practice, many of the procedures and mechanisms for such participation have not been fully realised or function poorly. The engagement of Roma in monitoring, consultations, and local empowerment remains unsatisfactory, necessitating additional efforts and improved institutional coordination.

The participation of Roma and pro-Roma CSOs in the drafting of the NRSF was facilitated through interagency working groups and public consultations, where Roma representatives could share their views and priorities. However, a significant portion of the perspectives and proposals from Roma CSOs were not taken into account, with much of the document based on analyses and recommendations from institutions and experts.¹¹ The proclaimed active involvement of Roma in the implementation of the NRSF remains limited, as Roma primarily participate in various programmes and projects, such as serving as mediators in education, healthcare, employment, and other fields. Their inclusion in management, monitoring, and evaluation processes is highly restricted.

Monitoring is carried out by state bodies, and there is no systematic mechanism for ensuring Roma participation in monitoring the progress of the implementation of the NRSF (for Roma CSOs' participation in the monitoring of EU funds, please see Chapter 4). The NRSF envisions the establishment of dialogue structures between the state, Roma civil society, and other stakeholders. However, in practice, NCCEII and its regional and local branches¹² are the only such structures. Their activities are irregular, sporadic, and fail to provide broad access for Roma representatives to the consultative process, rendering them largely ineffective.

The NRSF emphasises opportunities for participation and empowerment of the Roma community at the local level. However, in practice, real opportunities for empowerment remain limited due to indifference and, in many cases, open opposition from local authorities and institutions. At the same time, financial resources for local projects often do not reach the Roma community. There is a lack of sufficient financial and administrative resources for the systematic support of Roma civil organisations, which mainly rely on international project funding as their sole resource.

¹⁰ EC 2024, *COMMISSION STAFF WORKING DOCUMENT 2024 Country Report – Bulgaria*. Available at: https://economy-finance.ec.europa.eu/document/download/e3051272-7476-414a-bcf8-0c30edb8992c_en?filename=SWD_2024_602_1_EN_Bulgaria.pdf/

¹¹ Some proposals for activities that have not yet been adequately addressed: Desegregation activities at the municipal level with the implementation of a proportional quota model in each school, so as to stop the processes of secondary segregation. Development of social entrepreneurship as a form of employment for disadvantaged groups. Improvement of the state of the infrastructure of Roma neighbourhoods in terms of engineering infrastructure. Allocation and provision of land for housing construction and settlement of land ownership issues

¹² All 27 regional governments have established Regional Councils for Ethnic and Integration Issues. These councils have responsibilities for the implementation and monitoring of the Regional Strategies for Equality, Inclusion and Participation of Roma.

1.1.2. Progress in implementation

The most detailed and comprehensive information on the progress in implementing the planned measures and activities of the strategy can be found in the annual Administrative Monitoring Reports on the implementation of the strategies for the respective years. These reports are prepared by DPCEI staff. The department serves as the secretariat of the National Council for Cooperation on Ethnic and Integration Issues (NCCEII), which also functions as the National Contact Point for the implementation of the Strategy.

The reports are based on information submitted by responsible institutions regarding the measures, activities, and policies they implemented during the year. The NRSF is reported annually to the Council of Ministers. The information in the reports is presented according to priorities, corresponding goals, and measures from the NRSF and the Action Plan. Progress and results are measured using an indicator model integrated into the electronic 'Monitoring, Evaluation, and Control System for the Implementation of the NRSF'.¹³

Before publication, the reports are discussed within the NCCEII. The conclusions and recommendations presented below are based on information from the Administrative Monitoring Report on the implementation of the strategy in 2023.¹⁴ Some conclusions and recommendations also draw on independent research, analyses, and statements prepared by the Integro Association¹⁵ regarding policies, measures, and activities implemented in the areas of education, employment, and housing conditions for Roma. Additionally, information from local institutions and civil society organisations involved in the implementation of NRSF measures has been utilised.

Over the years, the administrative reports have been structured similarly, mirroring the structure of planned measures and activities according to the priorities outlined in the NRSF and the Action Plan. The reports contain an extensive amount of quantitative data on the number of individuals involved in various activities and events. Much of this information pertains to the implementation of specific projects funded under various European Union and European Economic Area programmes.

Overall, the indicators embedded within individual programmes largely align with those established in the Strategy and the Action Plan. In this sense, when discussing the quantitative implementation of planned measures, it may appear that the defined targets have been achieved.

The Administrative Monitoring Report on the implementation of the Strategy for 2023 highlights the participation of tens of thousands of individuals from vulnerable groups, including Roma, in various activities across all priority areas. Examples from the report include:

- Education: 52,566 children were enrolled in preschool education through support for fees and the appointment of additional staff under the 'Active Inclusion in Preschool Education' project.¹⁶ Forty-eight thousand three hundred and fifty-four children received supplementary Bulgarian language training through modules designed for children whose native language is not Bulgarian. Two hundred and twenty-three pedagogical and 612 non-pedagogical staff were hired. A total

¹³ The System for Monitoring and Control of the NRSF Implementation is maintained by the National Roma Contact Point and is available at:

<https://nrcpsystem.government.bg/SitePages/%D0%9D%D0%B0%D1%87%D0%B0%D0%BB%D0%BD%D0%B0%20%D1%81%D1%82%D1%80%D0%B0%D0%BD%D0%B8%D1%86%D0%B0.aspx>

¹⁴ This report is not yet available online and is provided by the NSCEII.

¹⁵ The Integro Association is a civil society organisation created by Bulgarian Roma. Its mission is to promote the social equality and active participation of the Roma community in Bulgarian society. Statements and positions of Integro Association are available at:

<https://integrobq.org/%D0%BA%D0%B0%D1%82%D0%B5%D0%B3%D0%BE%D1%80%D0%B8%D0%B8/%d0%bf%d1%83%d0%b1%d0%bb%d0%b8%d0%ba%d0%b0%d1%86%d0%b8%d0%b8/%d0%bf%d1%80%d0%be%d1%83%d1%87%d0%b2%d0%b0%d0%bd%d0%b8%d1%8f-%d0%b0%d0%bd%d0%b0%d0%bb%d0%b8%d0%b7%d0%b8-%d0%b8-%d0%b4%d0%be%d0%ba%d0%bb%d0%b0%d0%b4%d0%b8/>

¹⁶ Ministry of Education and Science, *Active Inclusion in the Field of Pre-school Education*. Available at: <https://sf.mon.bg/?go=projects&p=detail&projectId=67>

of 191,484 at-risk students participated in additional training through the 'Support for Success' programme.¹⁷

- **Employment:** Opportunities for temporary employment were provided to over 5,000 individuals from vulnerable groups, including Roma. Training for labour skills development was conducted for 1,800 participants. Over 700 individuals took part in professional qualification courses. More than 7,000 people were involved in employment, training, or social entrepreneurship initiatives.
- **Healthcare:** Over 15,000 consultations were conducted with individuals from vulnerable groups. Over 10,000 vaccines were administered (including for COVID-19, measles, and influenza). Two hundred campaigns were organised to prevent chronic diseases.
- Fifty thousand participants were informed about the importance of early diagnosis and preventive healthcare. Mobile teams examined more than 12,000 people, focusing on children and pregnant women. Over 5,000 children and youth participated in educational programmes on personal hygiene and healthy eating. Two thousand five hundred pregnant women received access to free examinations and consultations. Group consultations for young mothers were held in over 50 municipalities, 80 health clubs were created in Roma neighbourhoods, and over 20,000 people participated in health discussions with local communities.

While the data reflects impressive numbers, the report fails to clarify how these activities contribute to achieving the long-term strategic goals outlined in the priorities. It remains unclear how these measures have improved the condition of the Roma community, particularly those in vulnerable positions.

In education, no significant and sustainable progress can be identified regarding the inclusion and integration of children from vulnerable groups, including Roma, in preschool and school education. The dropout rate remains high, particularly at the secondary education level. According to the annual Administrative Monitoring Report for 2023,¹⁸ at the beginning of the 2023/2024 school year, the percentage of children and students in preschool and school education was 94.16 (as of 15 September 2022, the number was 94.72), indicating that the coverage ratio was lower than at the beginning of the 2022/2023 school year. Furthermore, the issue of segregation continues and has even deepened in smaller settlements and beyond.

There are still no effective mechanisms for creating active school communities involving the parents of children from vulnerable groups. No progress is evident in strengthening the role of schools in developing children's social-emotional skills. The crisis of functional illiteracy is deepening, including among students who graduate from higher levels of education. There has been no significant improvement in the quality of education, particularly in schools in smaller settlements.

In the field of employment, the reported increase in employment among vulnerable groups is primarily based on temporary employment programmes, after which unemployment levels return to their previous state. The data indicating low unemployment rates is largely due to the significant number of individuals from vulnerable groups who are not registered with employment offices and are not active in the labour market. Adequate training and vocational qualification programmes tailored to the local context are not being offered. There are no effective measures to combat work in the informal economy, where many vulnerable individuals are employed.

In the healthcare sector, the proportion of uninsured individuals remains substantial, particularly among vulnerable communities. Access to adequate healthcare services is limited for many people in small and remote settlements due to a lack of medical personnel. Discriminatory attitudes and behaviours persist in communication between healthcare institutions and local communities. Despite the significant number of programmes and projects in the field of intercultural communication and cultural identity, no real progress can be reported in this area beyond the completed projects.

The problem of illegal housing and families living in extreme poverty with children remains unsolved in many regions of the country. To implement the measures provided for in NRSF, an integrated approach to solving

¹⁷ Ministry of Education and Science, *Support for Success Projects*. Available at: <https://podkrepauspeh.mon.bg/>

¹⁸ This report is still not available online; we received it as a file from the NSSEII Secretariat.

complex problems must be strengthened, engaging authorities and institutions at all levels, with local authorities fulfilling their respective responsibilities but with the support and resources of the state.

A very small proportion of municipalities approach the problems of vulnerable people in their territories with the necessary concern and responsibility, which only exacerbates the issues. Some of the most severe problems require state intervention through the adoption of appropriate changes to the regulatory framework, particularly concerning housing policy.

There are also positive examples in this regard. Thanks to the persistent efforts of civil society organisations over many years, a solution was initiated in 2024 to address the issue of missing ID cards for more than 77,000 people, primarily Roma. Due to the joint efforts of civil society and certain members of parliament, a necessary amendment to the 'Civil Registration Act' was made, enabling every citizen in the country to obtain an ID card.¹⁹

Some findings in the administrative report support the conclusion of insufficient progress in implementing the NRSF and highlight urgent measures for action. These findings are linked to the reluctance of some municipalities to allocate funds in their budgets to integration efforts, meaning they rely solely on external funding. The existence of illegal housing and the lack of alternatives following its removal pose significant challenges for local authorities. A major issue is the numerous homes located in unregulated, abandoned, and semi-ruined areas with poorly maintained roads and without sewer systems. The segregation of marginalised groups in isolated neighbourhoods and the social isolation of their residents further worsen housing conditions, create problems with the construction and maintenance of infrastructure and hygiene, and pose challenges in terms of the provision of services.

These gaps suggest a need for more robust mechanisms to evaluate the qualitative impact of the measures and align them more effectively with long-term goals.

1.1.3. Effectiveness of monitoring

The monitoring mechanism for the NRSF is described in Chapter 10 of the Strategy: "Monitoring, Evaluation, and Control System for the Implementation of the Strategy" (hereafter, 'the System').²⁰ This was established in 2016 within a project funded by the Operational Programme 'Human Resources Development' 2014–2020, co-financed by the ESF. It aims to monitor, evaluate, and ensure accountability for the implementation of the NRIS 2012–2020 and subsequently for the new NRSF 2021–2030.

The main objectives of the System are to establish a clear structure for monitoring progress, provide a reliable database for analysing policy effectiveness, and improve coordination among institutions involved in NRSF implementation. The System ensures regular, systematic verification, control, and tracking of the progress and quality of NRSF implementation, as well as its accompanying Action Plan.

This is accomplished using key indicators (e.g., number of Roma children in the education system, number of individuals receiving healthcare services, number in various types of housing, and many others). The System monitors the implementation of all interventions (activities, projects, research, studies, etc.) aimed at the inclusion and participation of individuals from vulnerable ethnic groups, with a focus on Roma, including interventions executed locally by municipalities, CSOs, research and analytical institutions, centres, and others.

It provides an assessment of the impact of implemented interventions by identifying problems in the application of measures to support improvements in their efficiency and effectiveness. The primary source of information is the regular reports on the implementation of measures outlined in the plan provided by the ministries and municipalities responsible for implementing the measures and activities.

The main responsibility for monitoring the implementation of the NRSF and related plans lies with the NCCEII. The NCCEII Secretariat coordinates the preparation of the report, summarises the information, and drafts the

¹⁹ Ministry of Regional Development and Public Works 2024. *Amendments to the Civil Registration Act have been promulgated*. Available at: <https://www.namrb.org/bg/aktualno/obnarodvani-sa-promeni-zakona-za-grazhdanskata-registratsiya-15730>

²⁰ Monitoring and Control System is accessible at: <https://nrcpsystem.government.bg/SitePages/%D0%9D%D0%B0%D1%87%D0%B0%D0%BB%D0%BD%D0%B0%20%D1%81%D1%82%D1%80%D0%B0%D0%BD%D0%B8%D1%86%D0%B0.aspx>

report, which is submitted for approval to the NCCEI and then adopted by the Council of Ministers. This constitutes the formal mechanism for the institutional monitoring of the NRSF's implementation.

RCM plays a key role in informal monitoring, observing and reporting issues, gaps, or successes in the NRSF's implementation. The national RCM consortium organises local and national discussions and other events to present and discuss information collected from the Roma community, identify issues and shortcomings in implementing the NRSF's measures, and develop recommendations for improvement. Unfortunately, this citizen monitoring is not yet part of formal administrative monitoring, as it is carried out within the framework of various CSO projects. The findings and recommendations of citizen monitoring are reflected in the Administrative Monitoring Reports to a very small extent.

Additionally, monitoring within the framework of projects funded by the EU and international donors often aims to reflect civil society's assessment of the NRSF's implementation.

In general, it can be concluded that the necessary organisation and tools for conducting monitoring are in place. The necessary formal structures have been created. The NCCEI is the central monitoring structure. It coordinates activities between state authorities, local authorities and civil society organisations. Ministries, agencies and municipalities report regularly on the implementation of their specific tasks defined in the National Action Plan. An annual reporting mechanism has been developed. Tools and indicators for measuring results have been developed. Although informally, feedback from non-governmental organisations (CSOs) is relied on, which involves reporting on shortcomings or ineffectiveness of measures. Monitoring activities are carried out according to a pre-established schedule. Significant experience has already been accumulated in collecting and processing information. The monitoring procedure has been applied since the previous period of implementation of measures and activities under the Strategy. However, as noted in the Administrative Monitoring Report for 2023, "there is a formalized structure for monitoring the implementation of the Strategy and the National Plan, but its effectiveness is limited by administrative and coordination challenges. Informal mechanisms and civil society play an important role, but they are not fully integrated into formal monitoring."

In particular, the following shortcomings and limitations in the monitoring system's implementation can be identified:

- Institutions often lack sufficient resources or capacity to conduct fully fledged monitoring. There are limitations in terms of the technical skills required for data collection and analysis, and in most municipalities, the impact analysis of measures at the local level is rarely carried out.²¹ There are weaknesses in coordination between different institutions and stakeholders, which lead to inconsistencies in reporting and implementation.
- Roma are poorly represented in monitoring structures. Mechanisms for the systematic inclusion of Roma communities in the monitoring process are lacking, which reduces trust in institutions.
- Data collection is often fragmented and unsystematic. Detailed analyses of the effect of measures on the socio-economic situation of Roma are lacking. Some indicators are not clearly defined or are not monitored and measured systematically.²²
- While monitoring is formalised at the institutional level (through the NCCEI and annual reports), a comprehensive system of transparency and publicly available data that could increase trust and encourage citizen participation is lacking. Progress reports are often not presented in an understandable format and are not always publicly available, which limits the possibility of public

²¹ In practice, integration policy in municipalities is usually driven by individual dedicated officials who combine this work with many other duties. In the best cases, their work is informally supported by Roma mediators and local activists, driven by personal motivation and proximity to the community.

²² The system is designed to allow for systematic monitoring and control. Unfortunately, due to the lack of interest of most institutions in the monitoring process, the System is not used consistently, but only during the period when the annual Administrative Monitoring Report is prepared, and all institutions are required to submit information on the implementation of the Strategy. The reported data is mainly quantitative, which does not provide complete information about the effect and impact of the reported activities.

scrutiny. Informal civil society mechanisms are not fully integrated into formal monitoring.²³ The lack of effective inter-institutional coordination, limited resources and weak engagement of Roma and civil society hinder the use of the full potential of the monitoring system. More effective coordination mechanisms between all stakeholders in the process are needed to ensure transparency and active participation from the Roma community and society as a whole.

1.1.4. Data collection

With the launch of the System, a procedure was introduced for collecting data necessary both for the development and implementation of policies and for monitoring and evaluating the implementation of the strategy. Simultaneously with the application of the system, its updating and improvement are carried out. An important part of the System's functioning is the collection of appropriate and reliable information. As stated in the NRSF, "the System facilitates the collection of data through formal and informal methods at local, regional, and national levels in various areas (sectors) following a defined methodology."

The data that is collected aligns with the indicators and algorithms for the collection, processing, and analysis of primary data developed in the NRSF. The Strategy also specifies the sources for data collection: "Alongside general statistical approaches, data on the implementation of the NRSF is collected based on territorial characteristics for settlements and parts of settlements with concentrations of poverty, illegal construction, and other indicators specific to this NRSF."

All the collected information is available in various tables within the System and is periodically updated and revised. The data is classified according to municipalities, regions, and districts. Local authorities and regional administrations are responsible for providing data through forms developed for the NRSF.

The main challenges in data collection are related to the reliability of the information that is gathered. Typically, the data is collected and summarised based on completed projects and is primarily quantitative in nature. Representatives of civil society are not actively involved in the data collection process, and their perspectives are not adequately reflected.

As noted earlier, informal mechanisms for involving civil society in the monitoring process, including data collection and processing, are used poorly. Overall, the collected data lacks impact assessments of implemented measures and initiatives, and the analyses that are produced often diverge from reality.

1.2. NRSF's synergy with domestic and EU actions

Chapter IX of the NRSF outlines the mechanism for implementing the integration policy. It emphasises that the NRSF "is an integral part of the government's overall strategy to achieve real changes in the lives of all Bulgarian citizens."

The interinstitutional mechanism developed within the framework describes the commitments associated with participation in the development, planning, and reporting of the measures and activities in the NRSF according to ministries, agencies, subordinate institutions or departments with delegated budget authority, municipalities, and others.

The funding of inclusive policies and programmes is carried out through resources from the state budget, the budgets of the relevant ministries and institutions, within the allocations to municipalities from the general subsidy for state-delegated activities, through municipal budgets from their own revenues, and in partnership with CSOs and through the financing of thematic projects under programmes associated with EU funds, as well as the World Bank, the United Nations, the Council of Europe, and others.

²³ The administrative monitoring reports on the implementation of the Strategy are usually a mechanical compilation of reports prepared by area. The report presents the results of activities carried out mainly within the framework of various projects. The volume of the reports is substantial, and the texts are dense and challenging to comprehend. On the other hand, there is a lack of adequate information about the reports that have been prepared and where they can be found. Ultimately, very few stakeholders are familiar with these reports. When preparing this document, we were unable to locate the administrative report for 2023 and therefore requested it from the Secretariat of the NCCEII.

In line with this, the various institutions develop their own strategies, plans, programmes, and other documents, incorporating policy elements consistent with the framework set out according to the NRSF.

1.2.1. Complementary policies

Since the NRSF serves as the main document outlining the framework for Roma integration in the country, various programmatic documents from different institutions complement and further develop the initiatives aimed at supporting the social inclusion of Roma. While these documents generally do not explicitly state their connection to the NRSF, some of the measures they contain are aligned with the NRSF's priorities and analyses and its planned measures and activities. In this sense, the activities described in these documents could potentially impact the implementation of the NRSF.

The documents are developed according to various ministries and relate to specific NRSF priorities. For instance, the Ministry of Education has developed the 'Strategic Framework for the Development of Education, Training, and Learning in the Republic of Bulgaria (2021–2030)',²⁴ which is stated to have been drafted in accordance with the NRSF. It includes measures designed to improve the quality of education, enhance teacher qualifications for working with Roma children, ensure desegregation, and provide inclusive education for children from vulnerable communities. In line with this framework, the 'Regulation on Inclusive Education'²⁵ was adopted and updated in 2024. This regulation outlines specific measures to support the personal development of children and includes additional support for children whose native language is not Bulgarian. These measures align with the NRSF, but as of now, there are no documents that report on the implementation of these measures.

The Ministry of Labour and Social Policy has also developed regulatory documents that are directly related to the NRSF. These include the 'National Strategy for Poverty Reduction and Promotion of Social Inclusion'²⁶ and the 'Employment Strategy of the Republic of Bulgaria 2021–2030'.²⁷ The analytical section of the former identifies many of the problems faced by the Roma community, which are also addressed in the NRSF. Issues such as multidimensional poverty among Roma, limited access to quality education, youth unemployment, and poor housing conditions are highlighted, and their resolution is addressed. The Employment Strategy outlines activities intended to ensure employment opportunities for Roma in accordance with the 'EU Roma Strategic Framework for Equality, Inclusion, and Participation'.

The Ministry of Health has developed targeted documents addressing health-related issues among Roma, including the high rates of tuberculosis and hepatitis, limited access to healthcare services, lack of health insurance, and challenges in maternal and child health. These include the 'National Program for Improving Maternal and Child Healthcare 2021–2030',²⁸ the 'National Program for the Prevention and Control of Viral Hepatitis in Bulgaria 2021–2030',²⁹ and the 'National Program for the Prevention and Control of Tuberculosis in Bulgaria 2021–2025'.³⁰

Alignment with the NRSF priorities is also evident in the 'National Development Program Bulgaria 2030'³¹ and its implementation plan. Measures are proposed for inclusive education, including the effective implementation

²⁴ Strategic Framework for the Development of Education, Training, and Learning in the Republic of Bulgaria 2021–2030, available at: https://www.mon.bg/nfs/2021/03/strategicheska-ramka_obrobuuchene_110321.pdf

²⁵ Regulation on Inclusive Education, available at: <https://www.mon.bg/regulation/naredba-za-priobsthavasthoto-obrazovanie/>

²⁶ National Strategy for Poverty Reduction and Promotion of Social Inclusion, available at: <https://mlsp.government.bg/uploads/35/sv/nsnbnsv-2030-dop-izm-2.pdf>

²⁷ Employment Strategy of the Republic of Bulgaria 2021–2030, available at: <https://mlsp.government.bg/uploads/26/zaetost/employment-strategy-2021-2030-2022.pdf>

²⁸ National Program for Improving Maternal and Child Healthcare 2021–2030, available at: https://old.mh.government.bg/media/filer_public/2021/04/14/programa-majchino-detsko_zdrave-21-30.pdf

²⁹ National Program for the Prevention and Control of Viral Hepatitis in Bulgaria 2021–2030, available at: https://www.rzi-vt.bg/kartinki/programi/np_hepatiti_2021-2025.pdf

³⁰ National Program for the Prevention and Control of Tuberculosis in Bulgaria 2021–2025, available at: <https://www.rzi-dobrich.org/files/upload/programi/nacionalna-programa-prevenciq-kontrol-tuberkuloza-2021-2025.pdf>

³¹ National Development Program Bulgaria 2030, available at: <https://www.minfin.bg/bg/1394>

of mechanisms to ensure that all children are integrated into the education system, promote social cohesion among different societal groups, and provide adequate housing conditions, among others.

What is currently missing from most of these documents is information on the implementation of the planned measures and their impacts. Without such information, doubts remain as to whether the developed documents and measures are planned solely out of obligation and remain merely nominal.

1.2.2. Alignment with EU Actions

Within the framework of the European Semester cycle, European Commission staff working reports on Bulgaria in recent years have consistently highlighted several issues specific to the Roma community. The Integro Association, as part of the ERGO international network, regularly reviews these reports and their related country-specific recommendations. Notably, the findings in these reports persistently include conclusions similar to those contained in the 2023 report, such as:

“Roma inclusion in education remains a challenge, as well as the inclusion of people with disabilities. Young people aged 15–29 not in education, employment, or training (NEET) and Roma still face substantial difficulties in accessing the labour market. The share of NEETs also remains relatively high, particularly among Roma. The rate of early school leavers remains a challenge and is especially high for Roma and people in less developed, rural, and remote areas. Quality and equity in education, particularly for Roma and in rural areas, remains a challenge.”³²

In line with these conclusions, recommendations are issued to the state, yet there is no specific information about their implementation. The recurrence of these findings in each successive EC staff working report on Bulgaria suggests that the recommendations have not been adequately implemented.

Despite the high expectations associated with the ‘Recovery and Resilience Plan’ in terms of its contribution to social inclusion policies, there is currently no information on the planning or execution of substantial and adequate measures in this direction.

1.2.3. Addressing concerns in previous assessments

The implementation of the NRSF is subject to monitoring and analysis by numerous civil society organisations in the country. These analyses often result in various recommendations aimed at improving the implementation process of the NRSF and enhancing the effectiveness of the measures and activities that are undertaken. Unfortunately, the majority of these recommendations remain confined to the documents in which they are formulated, without eliciting significant responses or being considered in the continued implementation of the NRSF.

For example, the previous 2022 RCM report on the quality of the NRSF in Bulgaria,³³ identified numerous weaknesses and deficiencies in the development of the NRSF. These include an unstructured and inconsistent consultation process, insufficient measures to expand the scope of policies, the exclusion of topics related to combating antigypsyism, and the promotion of Roma participation, among others. Based on these findings, important recommendations were made to improve collaboration with civil society, enhance Roma participation at all levels – including in the management and monitoring of the strategy – reform the NCCEI, and strengthen the alignment of the NRSF with other strategic and policy documents.

Currently, there is no information on measures taken in response to most of these recommendations. For instance, there is no clarity on whether and to what extent there have been improvements in the functioning of the NCCEI and its Secretariat as a result of the reform described in Section 1.1 of this report.

³² Commission Staff Working Document 2023 Country Report – Bulgaria, available at: https://economy-finance.ec.europa.eu/system/files/2023-05/BG_SWD_2023_602_en.pdf

³³ Roma Civil Monitor (2022) Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Bulgaria https://romacivilmonitoring.eu/wp-content/uploads/2023/07/RCM2-2022-C1-Bulgaria-FINAL_BG_v2.pdf; <https://amaliqe.bg/wp-content/uploads/2023/07/RCM2-2022-C1-Bulgaria-FINAL-PUBLISHED-CATALOGUE>

1.3. Roma participation in implementation and monitoring

The participation of Roma individuals and Roma organisations in the implementation and monitoring of the NRSF is a crucial factor for achieving positive outcomes and ensuring the effective impact of the planned and executed measures and activities. Unfortunately, as noted earlier, Roma involvement in these processes remains limited.

The participation of Roma in the management and monitoring of programmes and projects is almost negligible. Generally, Roma are predominantly seen as the objects of intervention rather than as active subjects in the execution of activities.

1.3.1. Involvement of Roma CSOs in implementation

The possibilities for participation are currently limited to the following options:

1. Participation of Roma civil society structures in the implementation of projects under EU programmes. This participation is not guaranteed and is based on a competitive process, with applications submitted through announcements for the development of project proposals for various programmes. Unfortunately, there are very few Roma CSOs with the necessary capacity and resources to compete on a level playing field with other CSOs, and thus, a very small proportion of the resources under the programmes is managed by Roma organisations. The participation of Roma CSOs primarily takes the form of partnerships with other organisations and institutions, and this largely limits their role, especially in the management and monitoring of planned measures and activities.³⁴
2. Participation of Roma as contractors and employees in the implementation of activities within the framework of projects of larger non-Roma organisations. The participation of Roma in these projects is limited by the framework of the project/activity planned by the organisation.
3. Participation of Roma as beneficiaries and/or users of the results of projects implemented by non-Roma organisations. These are Roma who are the target groups of projects and programmes and are included as participants in various activities or as users of services. In this way, the active participation of Roma in the implemented activities is not stimulated.

1.3.2. Roma in public institutions implementing the NRSF

The participation of Roma in teams in public institutions involved in the implementation of the NRSF is still very limited. At the national level, a few Roma participate through their organisations in the NCCEIL, where their participation does not have the necessary weight and effectiveness. There is no information on the participation of Roma representatives in the structures of the bodies and institutions responsible for the implementation of the NRSF. At the regional level, the established integration councils typically have Roma representatives; however, their level of influence does not allow them to have a significant impact on decision-making processes. At the municipal level, there are specialists in integration issues who also have limited resources and opportunities to make decisions on the implementation of policies. There are only a few examples of Roma experts who have the opportunity and freedom to participate in the development and implementation of integration policies. Most often, Roma participation is limited to their role as educational and health mediators, and in many cases, even mediators are not effectively included in measures and activities.

1.3.3. Roma participation in monitoring and evaluation

The participation of representatives of the Roma community and Roma civil society in monitoring is very irregular and sporadic. Usually, their participation in monitoring is carried out within the framework of the preparation of annual reports by the Secretariat of the National Council for the Implementation of the National Strategy for the Development of the Republic of Bulgaria and is limited to providing information on implemented activities. Sometimes their assessment of the implementation of measures and activities is also

³⁴ The majority of Roma organisations have a very small annual turnover - under 10,000 BGN (5,123 EUR) or no turnover. When applying for funding programs, one of the requirements is that the annual turnover of the organisation must be commensurate with the amount applied for. Thus, over 90% of Roma organisations cannot apply for medium-sized projects (between 20,000 and 50,000 BGN, or 10,250 and 25,600 EUR), and for larger projects, no more than 4-5 organisations in the entire country have the opportunity. Apart from this, the teams of most Roma organisations are limited to one or two people.

required, but these assessments are not always adequately reflected in the reports. More opportunities for the preparation of adequate analyses and assessments of the implementation of the National Strategy for the Development of the Republic of Bulgaria by Roma civil society are provided through various programmes and projects for the implementation of civil monitoring. Such projects are usually initiated and financed by foreign bodies and organisations. The reports prepared within the framework of these projects present the genuine assessment and opinion of the Roma civil society regarding the implementation of the National Strategy for the Development of the Republic of Bulgaria and the state of the integration policy. However, these opinions are not always taken into account by the institutions responsible for the implementation of the National Strategy for the Development of the Republic of Bulgaria, and the recommendations made in them remain without consequence.

1.3.4. Contribution of the National Roma Platform to the NRSF implementation

The National Roma Platform (NRP) in Bulgaria is an initiative supported by the European Commission, launched as part of efforts to integrate the Roma community. The NRP was established in 2016 as a tool for promoting dialogue between various stakeholders, including representatives of the Roma community, institutions, non-governmental organisations and local authorities. The establishment of the NRP was met with enthusiasm and hope by a significant number of Roma and pro-Roma organisations, which participated in the process of its creation.

However, from the very beginning of the NRP, the activities associated with its establishment and functioning came under the framework of different projects. One of the significant projects was the project 'T.E.A.M – Together we Achieve More' (JUST/2015/RDIS/AG/NRP2/8805). This project was implemented through the administration of the Council of Ministers – the Secretariat of the NCCEII – and its main goal was to organise the NRP as a mechanism for dialogue, exchange, and cooperation among all stakeholders in the implementation of the NRIS 2012-2020. Within the framework of the project, numerous working meetings, regional and national forums, discussions and deliberations on the strategy were held. Representatives of local authorities, regional administrations, civil society organisations, Roma activists, etc., participated in these meetings. In general, the NRP remained active as long as resources were available within the framework of various projects. However, after the completion of the projects in 2017, a decline in the activity of the NRP was noticed. Gradually, representatives of state institutions withdrew from it, as they did not have specific commitments related to project implementation. The motivation of Roma organisations to participate in the NRP also dropped sharply, especially since significant differences in the expectations of different groups and organisations from the community emerged.

Ultimately, after the completion of the project activities, the functions and significance of the NRP for the NRSF became significantly limited. Over the past three to four years, there has been no information about any specific activities. The role of the NRP in the development of the new NRDP 2021-2030 is almost insignificant. Even if it formally still exists as an NRP, it does not have a serious role in mobilising Roma and pro-Roma civil society and other stakeholders in the implementation of the NRSF.

2. REVIEW BY THEMATIC AREA

2.1. Fighting antigypsyism and discrimination

In a previous report, it was noted that as early as 2009, Bulgaria had transposed the Council Framework Decision 2008/913/JHA on combating racism and xenophobia into national legislation. Articles 162 and 163 of the Bulgarian Criminal Code address hate speech and hate crimes related to race, nationality, or ethnic origin. However, the official monitoring report on the implementation of the previous National Roma Integration Strategy (NRIS) 2012-2020 highlighted significant shortcomings, particularly in the areas of the rule of law and anti-discrimination. The report concluded that “The definitions of goals, certain objectives, and the administrative reports on their implementation deepen discrimination rather than mitigating it.” An independent civil society report further emphasised that the absence of measures addressing hate speech and hate crimes in both the NRSF and the National Action Plan starkly illustrated the lack of political will.

2.1.1. Effectiveness of the NRSF in addressing the problems

The current National Roma Strategic Framework (NRSF) acknowledges challenges related to antigypsyism and discrimination. The preamble references the 1st, 2nd, 3rd, 4th, 5th, 7th, and 10th UN Sustainable Development Goals for 2030 as pertinent to the strategy. Recommendations from the European Commission, the Council of Europe, and OSCE, along with European Parliament resolutions and FRA survey data, are thoroughly cited and taken into account. The 2020 non-legally binding working definition of antigypsyism/anti-Roma discrimination established by the International Holocaust Remembrance Alliance (IHRA)³⁵ is explicitly mentioned as a benchmark for future policies in Bulgaria. Despite these acknowledgements, most Roma CSOs express concerns that the proposed solutions and activities addressing antigypsyism and discrimination are insufficiently prioritised within the NRSF. Unfortunately, global issues, which include the COVID-19 epidemic, the wars in Ukraine and the Middle East, as well as the ongoing political crisis in Bulgaria, must be noted as important factors regarding the inability to reduce and address discrimination and hate speech. The described problems make it difficult to implement the planned goals and priorities. The main institution to which the fight against discrimination is addressed is the Commission for Protection against Discrimination. Although it has limited powers, its recommendations and administrative penalties have a positive impact. The problem is the impossibility or unwillingness of one of the affected parties (Roma) to address this commission. The reason for this may be a general mistrust of institutions or the source of discrimination, which is often an employer or local administration. Additionally, in 2022, the Commission identified a lack of financing as a major obstacle to implementing the strategy.

The NRSF addresses this concern within “Priority 5: Rule of Law and Antidiscrimination”. Its operational goal is stated as: “Guaranteeing the rights of citizens, with an emphasis on women and children, protection of public order, prevention, and counteraction to manifestations of intolerance and hate speech.” However, there is a risk that the NRSF may replicate the biased implementation seen in the NRIS. Although the NRSF includes the aim of “Improving measures for effective criminal prosecution in cases of hate speech and hate crimes” (p. 33), it lacks detailed legislative measures and fails to incorporate these into the Action Plan. This means that the recommendations and challenges noted in the preamble are not adequately addressed in the main body of the document.

The concept of ‘antigypsyism’ is mentioned only in the context of the item titled “Identification, Prevention, and Protection of Hate Crime Victims”, but no concrete measures are provided. Additionally, Bulgaria lacks a unified institutional source for hate crime and antigypsyism statistics. The NRSF relies on self-reported data from a perception survey on discrimination conducted by the NSI, without sufficiently explaining why this is considered the sole reliable data source. Other credible sources, such as the Ministry of Interior (which has data on hate crime cases and police investigations), the Chief Prosecutor’s Office (figures on hate crime proceedings, including Roma-related cases), the Ministry of Justice (detailing the proportion of Roma involved in court procedures and in detention), and the Antidiscrimination Commission (with information on submitted cases), are not referenced but should be considered. A significant weakness of the NRSF is the absence of plans to collect additional Roma-sensitive statistics related to anti-discrimination efforts. Here, one of the main

³⁵ IHRA, *Working definition of Antigypsyism/ Anti-Roma discrimination*. Available at: <https://holocaustremembrance.com/resources/working-definition-antigypsyism-anti-roma-discrimination>

problems is the 'self-determination' of Roma. When such incidents or cases of discrimination are reported, the overall level of reporting problems to designated institutions, as well as the role of CSOs and their interaction with local authorities in assisting victims, is a concern. In addition, there are large differences in the levels of discrimination and how it is dealt with, depending on the region and the local characteristics of the population and the policy of the local administration. Sometimes in rural communities, it is easier to identify the problem and have it solved by the local administration than in a regional city. On the other hand, in regional cities, there are representations of the Commission for Protection against Discrimination, CSOs, and other independent institutions that can assist affected parties.

2.1.2. Addressing the problems beyond the NRSF

In the general context, discrimination can be found in any area, and solving the problem depends on many different factors and specificities that can hardly be comprehensively addressed by a strategy or action plan. Unfortunately, 'double' discrimination can also be observed if, in addition to being a 'Roma', the relevant person is discriminated against based on gender, language or religion. This is something that happens often in the workplace as well. Often, a lower economic status and dependence on the employer prevent individuals from reporting to the Commission in order to keep their job. Meanwhile, a significant portion of the complaints addressed to the commission concern workplace discrimination.

Regarding the anti-discrimination issue, the NRSF addresses diversity in only a general sense, highlighting the heterogeneity of Roma communities and including diversity training sessions. However, it fails to specifically address the needs of distinct groups within the Roma population, such as children, women, young people, the elderly, individuals with disabilities, EU-mobile citizens, non-EU nationals, and stateless Roma. The concept of 'gender' is mentioned primarily in the context of mainstream policies related to gender-based violence and anti-human trafficking measures, but is not adapted to reflect the unique challenges faced by Roma women and girls. Various non-governmental organisations, municipal and state institutions are working on this topic, related to overcoming discrimination. This happens at the local, regional and national levels. The Roma topic is extensive and almost always covered in documents and policies created by both public institutions and the non-governmental sector. Most of the strategic objectives defined by the NRSF are relevant to the identified challenges and international and civic recommendations with regard to discrimination. However, in many cases, there is no coherence between the objective and the measures (as in the example above – the capacity building objective starts with a victimising discourse). There are no precisely targeted measures for preventing hate speech and crimes, including those targeting the media or high-profile politicians. However, other institutions related to the development of culture and sports, as well as non-governmental organisations, try to address the different segments of the Roma society, such as women, sexual minorities, and people with disabilities. These are groups with particular vulnerabilities, but are outside the main focus of the Strategy and institutions. The reason for this is the difficulty of targeting them in a more conservative context. The NRSF is a foundational document, but efforts by the non-governmental sector and good practices from the European Union and other international organisations are those that help create a sense of collaboration among stakeholders at all levels to address discrimination. However, serious shortcomings remain on the part of public figures, including political leaders.

2.2. Education

The previous RCM report (2022)³⁶ identified persistent challenges in the area of Roma education, including educational segregation, high dropout rates, and the underrepresentation of Roma culture and language in school curricula. Structural factors, such as poverty, social isolation, and teacher biases, were also identified as significant barriers. A lack of ethnically disaggregated data and inadequate monitoring mechanisms further hindered progress, making it difficult to assess the effectiveness of implemented measures.

The last available governmental monitoring report on the NRSF (2023) states that

*"ethnic origin cannot and should not be considered a sign of vulnerability or put some Bulgarian citizens at a disadvantage compared to other Bulgarian citizens."*³⁷

³⁶ Roma Civil Monitor (2022) Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Bulgaria. <https://romacivilmonitoring.eu/wp-content/uploads/2023/07/RCM2-2022-C1-Bulgaria-FINAL-PUBLISHED-CATALOGUE.pdf>

³⁷ Административен Мониторинг на изпълнението на Националната стратегия на Република България за равенство, приобщаване и участие на ромите (Административен Мониторингов Доклад За Изпълнението

This statement is a clear sign of hidden institutional discrimination, since it could be used as an argument against any targeted measures. However, it is clear from Article 7, paragraphs 16 and 17 of the Bulgarian Law on Protection Against Discrimination, that measures to protect the distinctiveness and identity of persons belonging to ethnic, religious or linguistic minorities and their right, individually or together with other members of their group, to maintain and develop their culture, to profess and practice their religion or to use their language; as well as the measures in the field of education and training to ensure the participation of persons belonging to ethnic minorities, to the extent and for as long as these measures are necessary, are not discrimination and therefore do not put other Bulgarian citizens at a disadvantage.

What provides hope is that, despite the highlighted sentence above, the Ministry of Education and Sciences is rather supportive and proactive and therefore some progress has been made in the past three years, with mainstreamed measures:

- Since 1 April 2022, all public kindergartens and nurseries in Bulgaria have been fee-free.³⁸
- Since 2024/2025, all textbooks for students at all school grades (1-12) have been free.³⁹
- Enrolment in preschool education has become obligatory for all children since the 2023/2024 school year⁴⁰ (a crucial success, since there was a lack of places in kindergartens before and serious discrimination against Roma children in that respect).

With regard to Objective 1. "Effective coverage, inclusion and reintegration of children and students of compulsory preschool and school age from vulnerable groups, including Roma", and Measure 1.1. "Coverage of children from vulnerable groups, including Roma, in forms of early childhood education and care and ensuring continuity of education for 4-5 and 6-year-olds", from April 2022, parents no longer pay fees for their children to attend nursery/kindergarten.

With regard to Measure 1.2. "Ensuring immediate and continuous access to the education system for children and students of compulsory preschool and school age...", the net enrolment rate for 2022 was 94.72% and 94.16% for 2023. However, these figures do not appear to be reliable. Combating school dropouts and increasing enrolment rates in Bulgaria has become an enormous administrative challenge due to the free movement of people within the EU, as there is no common European mechanism for tracing children of school age. The last available figures from the NSI database regarding school leavers are for the 2019/20 school year and indicate that out of 17,500 dropouts, approximately 37% are due to departures abroad.⁴¹ In response to a Parliamentary request, the Minister of Education announced that by November 2022, approximately 39,000 out of 53,000 (i.e., 74%) dropouts were due to departure abroad. This represents a significant increase in both the total number of dropouts and the proportion of school leavers who depart abroad with their family members. Unfortunately, due to the general legislation about personal data protection, including GDPR, the Ministry of Education and Science (MoES) has no right to collect ethnic data, and the share of Roma children in this aggregation is not clear.⁴²

The role of educational mediators, who bridge communication between municipal schools and Roma communities, has been expanded. According to data from the Centre for Information Provision of Education, as of the end of December 2023, the number of educational mediators appointed with funds from the state budget or under European projects for the 2023/2024 academic year was 1,184, with 71 of them related to more than one educational institution.

Despite ethnic data limitations, within national censuses, a well-known correlation exists between ethnicity and level of education. Because of that, since 2018 with the Regulation on the Financing of Institutions in the Preschool and School Education System, MoES has been providing additional funds for educational institutions with a concentration of children and students from vulnerable groups (defined by "the low educational status

През 2022 Г. На Националната Стратегия На Република България За Равенство, Приобщаване И Участие На Ромите (2021 - 2030) Available at: <https://www.strategy.bg/FileHandler.ashx?fileId=32986>

³⁸ Voted on by Parliament in February 2022.

³⁹ Voted on by Parliament in February 2023.

⁴⁰ Voted on by Parliament in September 2020.

⁴¹ National Statistical Institute, <https://infostat.nsi.bg/>

⁴² The other measures within Objective 1 are not included because no progress has been observed.

of parents”) and based on the proportion of parents with less than secondary or primary education, or of parents with no education at all. Those funds may be spent on additional Bulgarian language lessons in schools and additional modules for children who do not speak Bulgarian in kindergartens, as well as for personnel engaged in measures to support access to education and prevent the risk of dropping out of the preschool and school education system of children and students from vulnerable groups. With current amendments to the Regulation on the Financing of Institutions in the Preschool and School Education System, from 2023, in Art. 52a, funds have been explicitly designated for the appointment of educational mediators, social workers and/or teacher assistants. The purpose of the amendments is to ensure the sustainability of the activities of educational mediators and to financially secure their work. Separately, an order of the Minister of Education and Science also approves the remuneration of educational mediators for the respective year. The funds allocated to vulnerable groups in 2021 amounted to EUR 15.7M, EUR 17.8M for 2022, and EUR 18.5M for 2023.

Despite the success with free kindergarten access and educational mediators, some of the other identified problems in the previous monitoring report remain unaddressed. The measures targeting desegregation are still assigned to the Centre for Educational Integration of Children and Students from Ethnic Minorities,⁴³ which focuses on fund allocation without having the authority to define or implement policies. The framework also continues to rely on broad indicators, such as the share of young people with secondary education or early school leavers, without disaggregating data by ethnicity. This lack of specificity obscures the real progress – or the lack thereof – that is being made in Roma education. While the NRSF emphasises the importance of inclusive education, its Action Plans lack the systemic reforms needed to combat segregation or effectively address the underlying causes of educational inequality.

2.2.1. Effectiveness of the NRSF in addressing the problems

The NRSF has contributed to addressing Roma educational challenges through some innovative programmes and initiatives, particularly those funded by the European Economic Area (EEA) grants. Projects like ‘Local Development, Poverty Reduction, and Enhanced Inclusion of Vulnerable Groups’⁴⁴ have introduced new approaches, including outreach activities in rural areas, leadership training for Roma youth, and educational forums for teachers and school staff. Activities have been implemented to empower Roma youth, prevent school dropouts, and foster community engagement.

Despite these efforts, the NRSF has not been entirely effective at addressing critical problems. The legislative changes necessary to tackle segregation at the macro level, such as revising the district-based education system, have not been implemented. Many proposed measures, such as providing tools and materials for educational desegregation, are too modest to bring about significant change. Moreover, there has been replication of existing activities that have already proven ineffective. The practice of taking a small proportion of children out of segregated schools and driving them by bus to another location further undermines the NRSF’s impact.

The monitoring and evaluation mechanisms within the NRSF also remain weak. The reliance on non-ethnic indicators prevents accurate tracking of progress specific to Roma communities. Furthermore, inconsistencies between the goals outlined in the NRSF and the measures proposed to achieve them reduce the likelihood of achieving meaningful outcomes. In addition, while the NRSF includes objectives for improving educational quality in schools with high concentrations of vulnerable students, it lacks qualitative indicators to measure this improvement effectively. The indicator that was defined to measure the “Quality of training” (Measure 3.1.) is “number of institutions granted additional funding for working with vulnerable groups”, i.e. it says nothing about ‘quality’ and nothing about ‘Roma children’.

Cross-sectoral coordination has shown some promise, with ministries working together to implement integrated approaches with regard to the dropout prevention mechanism. However, these efforts have been sporadic (once or twice per school year) and insufficient to address the deeply rooted issues faced by Roma students. The COVID pandemic, coupled with economic challenges such as inflation and the war in Ukraine, has further strained resources, worsening dropout rates and social isolation among Roma communities.

⁴³ The Centre for Educational Integration of Children and Students from Ethnic Minorities is a structure within the Ministry of Education and Science. More information about it is available at: <https://coiduem.mon.bg/>

⁴⁴ EAA Grants, Local Development, Poverty Reduction, and Enhanced Inclusion of Vulnerable Groups. Available at: <https://www.eaagrants.bg/en/programs/local-development/news/obshha-informacziya-za-programa-mestno-razvitiie>

A total of 39,774 children were included in additional Bulgarian language training, and a total of 1,126 kindergartens/schools were involved in the activity. The distribution is as follows: number of children from vulnerable groups who do not have a good command of Bulgarian included in additional cumulative training modules: 77,654 (cumulatively since 2019); number of kindergartens in which training was conducted through additional cumulative Bulgarian language modules: 1,960 (cumulatively since 2019). However, due to the mass enrolment of Ukrainian children and lack of ethnic or nationality-based data, it is not clear how many of those children and students are Roma and how many are of other ethnicities.

2.2.2. Addressing the problems beyond the NRSF

While the NRSF forms the foundation for Roma education initiatives, significant efforts have also been undertaken outside its framework. Programs funded by the EU and other international mechanisms have played a critical role in bridging gaps left by the NRSF. Under the ROMACT initiative, in 2021, three types of activities were implemented to target existing educational inequalities and address the educational needs of various Roma communities at the regional and local levels.

- Training for the role of educational mediators, labelled “Approaches for ‘working in and with’ the Roma communities”, was held at the end of August 2021 in response to newly emerging post-COVID-19 issues and to help develop feasible solutions. Participants were school and kindergarten directors, teachers, educational mediators and municipal employees from partner municipalities of the ROMACT Program. The objectives of the training were:
 - Increasing the ability of educators, municipal employees, educational mediators, parents and other stakeholders to place the interests and needs of each student, including those from the Roma community, at the centre of school education.
 - Improving the relations and interactions between local stakeholders: teachers, educational mediators, and the community.
 - Increasing the effectiveness of the educational process.⁴⁵
- Support for families and children from vulnerable communities during the COVID-19 pandemic and in the immediate post-COVID-19 situation in the form of the distribution of masks, personal disinfectants and school supplies in various remote rural areas.⁴⁶
- Training about children's rights and barriers related to early childhood development was held in early November 2022. The participants were teachers, social workers, health professionals, mediators and municipal employees.⁴⁷

Another example is the Plovdiv Youth Centre's outreach programmes and leadership initiatives, which have actively targeted Roma youth in rural areas, empowering them to identify and address local problems. Training seminars for professionals working with vulnerable groups have fostered better understanding and capacity-building among educators and support staff. Between 2022 and 2024, the Centre Amalipe developed an extensive initiative to form Youth Groups for Tolerance and Civic Participation. They develop peer training and campaigns in 50 municipalities to improve civic engagement and overcome anti-Roma discrimination⁴⁸

These external efforts have also focused on addressing economic disparities, which remain a key barrier to educational participation. Economic hardship, compounded by recent challenges such as inflation and high energy costs, has deepened inequalities for Roma families. Programs that provide direct support, such as poverty reduction initiatives, are crucial for mitigating these effects.

The involvement of Roma organisations (Amalipe, New Road, World Without Borders, Integro) in planning and implementation processes has been another positive development. Their expertise has informed the design of

⁴⁵ Source: FB page of ROMACT Bulgaria, (02.09.2021)

⁴⁶ For example, source: FB page of ROMACT Bulgaria, (06.01.2021)

⁴⁷ Source: FB page of ROMACT Bulgaria, (04.11.2022)

⁴⁸ Amalipe, *Project Intercultural Academy for Youth Activeness and Participation*, available at <https://amalipe.bg/portfolio/intercultural-academy/>

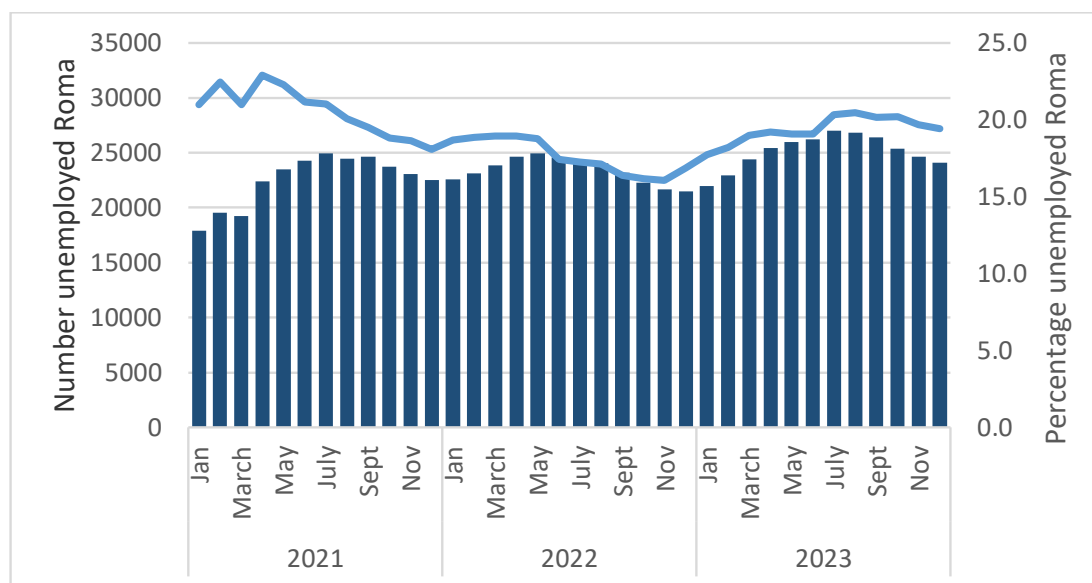
local and municipal actions, while Roma mediators have strengthened the link between public institutions and the communities they serve. However, this involvement often remains informal, and Roma representation in formal monitoring and decision-making processes is limited. Ensuring Roma voices are included at every stage of policy development and evaluation is essential for achieving lasting change.

Beyond the NRSF, addressing Roma education challenges requires a holistic approach. This includes legislative reforms to eliminate segregation, comprehensive poverty alleviation programmes, and awareness campaigns to challenge stereotypes and promote inclusion. Greater alignment between local, national, and international efforts can amplify the impact of these measures. Expanding cross-sectoral collaboration, engaging Roma organisations as equal partners, and enhancing the sustainability of initiatives will ensure that progress extends beyond isolated projects and delivers lasting benefits for Roma communities.

2.3. Employment

With regard to Employment, NRSF repeats the operational objectives of the previous strategic period. All the measures remain mainstreamed, with a poor reflection of challenges concerning ethnic data collection based on self-identification, which jeopardises the correct evaluations of efficiency, effectiveness, and impact. The advantage of the employment measures is that they broadly address the diversity of inactive and unemployed individuals, and include targeted interventions for women, NEET youth, and older adults. However, there are several important issues that are not addressed: improving labour conditions and the prevention of local and transborder exploitation; combating the grey economy and improving labour contracts in agriculture, forestry, and construction work; and the labour integration of cyclical transborder migrants at the local level (i.e. in the country of origin).

The trends in Roma unemployment, based on self-identification data, exhibit a surprising cyclical pattern that is opposite to the one typically observed in representative surveys.⁴⁹ Being employed mainly in construction, agriculture, and forestry, most Roma people are typically employed during the summer months. The official figures, published in the administrative report, should serve as an indicator of extreme levels of grey employment and a lack of contracts and social insurance as paid by employers, since unemployment appears to be rising during the summer months, which contradicts the reality.



Some of the mainstreamed measures, such as “Motivation of long-term unemployed” and “Motivation of NEETs”, as well as so-called “Employment community fairs”, are organised with the assistance of Roma labour mediators. The administrative reports acknowledge the contribution of the Roma labour mediators in 1,948

⁴⁹ Pamporov, A. (2009) “Romany Employment Specifics”. In: The Demographic developments and the work force in Bulgaria (ed. G. Mihova, P. Naydenova), Sofia: CPS-BAS, pp. 144-161 [in Bulgarian, summary in English]; Pamporov, A. (2010) “The Employment of Roma, Turks and Bulgarians. A comparative report based on the outcome of the Multipurpose Household Survey 2007”. In: Multi-Disciplinary Approaches to Romany Studies, (Eds.) Michael Stewart & Merton Rovid. Budapest: CEU Press, pp.131-154

meetings in 2023 and 1,599 meetings in 2022 with employers to encourage them to employ Roma but there is no available data on the actual number of the Roma labour mediators, nor the actual number of employers nor the industries and type of occupations discussed.

2.3.1. Effectiveness of the NRSF in addressing the problems

The local labour offices are the only institutions in Bulgaria that are authorised to collect ethnically disaggregated data due to the specific nature 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 direct or indirect discrimination. The number of self-identified Roma unemployed in 2023 was 27,141 on an annual average monthly basis, with the number varying from 24,816 in January 2023 to 28,647 in August 2023, when the maximum number of registered unemployed was also recorded during the year. Compared to 2022, the number of registered unemployed Roma increased by 2,463 on an average monthly basis or by 10.0%, with the growth rate of the number of registered Roma being four times greater than the average growth rate (2.5%) in the total number of unemployed. Compared to 2020, the year of the COVID-19 lockdown, the unemployment rate was much higher, with an average monthly number of around 40,402.

2.3.2. Addressing the problems beyond the NRSF

Prior to the COVID-19 pandemic, Roma employment had a seasonal pattern, with higher rates during the summer and lower rates during the winter months, due to the prevalence of low-skilled occupations in agriculture and forestry, as well as in building and construction work. The reversal in the trend after 2020 requires further analysis of the grey economy and illegal jobs in Bulgaria, as well as of informal contracting and labour exploitation in the EU.

2.4. Healthcare

The systematic issues observed in the previous RCM report are still present; the challenges have even grown. Firstly, there is no universal healthcare coverage, and due to social and economic inequalities, Roma people – especially those living in remote rural areas – have limited access to medical services. The second issue relates to supply. One of the barriers to improving access to healthcare insurance, affecting approximately 20% of the adult Roma population, is the lack of a formally registered residence, which is often caused by a lack of identification documents. The other 30-40% (the figure fluctuates seasonally) suffer from a lack of access due to unemployment and the related lack of regular social security (healthcare) contributions. The number of medical personnel is shrinking. This especially endangers medical services in the Razgrad, Dobrich, Kardzhali and Targovishte regions.⁵⁰ In fact, there is a sufficient supply of medical personnel only in the major cities that have university hospitals: Sofia, Plovdiv, Varna, Stara Zagora, and Pleven.

A recent fieldwork screening study by the Trust for Social Achievement showed that in some regions, there are no regular general practitioner practices within a radius of 50 km and that some pharmacies are selling medicines illegally imported from Turkey without a license in Bulgaria.⁵¹ Such settlements usually have public transportation to the municipality or regional centre only once a week.

2.4.1. Effectiveness of the NRSF in addressing the problems

The present Bulgarian NRSF sets out five main objectives regarding the health sector for the Roma population, including:

1. Improving maternal and child healthcare in specific vulnerable ethnic communities with a concentration of poverty.
2. Improving access to quality public healthcare for people in situations of poverty and social vulnerability
3. Reducing stigma and discrimination against people from vulnerable groups and raising awareness in the field of public health.⁵²

⁵⁰ NSI, Medical personnel by regions and districts (<https://www.nsi.bg/en/content/3318/medical-personnel-3112-statistical-regions-and-districts>)

⁵¹ To ensure the safety of the respondents, the settlements are not indicated in the current report.

⁵² National Strategy of the Republic of Bulgaria for Equality, Inclusion and Participation of the Roma (2021-2030), p.8.

These goals are indirectly related to the European Commission's minimum goal of reducing by at least half the difference in average life expectancy between members of the Roma minority and other citizens.⁵³

In more detail, the National Action Plan for NRSF 2024-2027 contains 28 specific measures associated with healthcare, some of which, however, also existed in the previous Plan 2022-2023. These are ambitious measures, such as:

- Obstetric and gynaecological examinations delivered through mobile offices in settlements with a dense Roma population – a fivefold increase.
- Coverage of children without general practitioners found by health mediators – a fourfold increase.
- Immunisations with mobile teams – a fivefold increase.
- HIV prevention and control, anonymous and free counselling – a fourfold increase.
- Examinations and appointment of tests for socially significant diseases with mobile offices – fluorography, ultrasound and clinical laboratories.
- Selective prevention programmes for children and families from the Roma community.
- Explanatory campaigns on the need for mandatory immunisations/vaccinations of the population.⁵⁴

All types of stakeholders – the Ministry of Healthcare, the National Roma contact point team, as well as the Roma CSOs – have expressed that one of the main achievements of the NRSF in the current monitoring cycle was the amendment of Ordinance 26 in August 2022 and June 2024. Thereby, the scope of medical services related to obstetric care for uninsured women, including the provision of hospital medical care under clinical pathway No. 005 “Childbirth”, and clinical pathway No. 001 “Inpatient care for high-risk pregnancies”, was extended. Under this amendment, the Ministry of Health will guarantee testing for all newborn children for phenylketonuria, congenital adrenal hyperplasia, congenital hypothyroidism, spinal muscular atrophy, severe combined immune deficiencies, and cystic fibrosis, regardless of their health insurance status. Moreover, free tests are provided to examine the risk of having a child with Down syndrome, other aneuploidies, spina bifida, anencephaly and severe abdominal wall defects and other genetic diseases; as well as DNA analysis for autosomal recessive, autosomal dominant, X-linked and mitochondrial diseases, in which the identification of molecular defects is important with regard to treatment or prenatal diagnosis. Last but not least, as of 1 January 2023, every uninsured woman is entitled to up to four preventive examinations during pregnancy.⁵⁵

Following the monitoring recommendations from the pre-COVID reports,⁵⁶ the Ministry of Health is currently piloting a new approach towards health mediation in seven municipalities. In Blagoevgrad, Burgas, Dimitrovgrad, Dupnitsa, Kazanlak, Novi Pazar, and Samokov, there are Roma health mediators employed directly as hospital staff, allowing them to assist not only the residents of a particular neighbourhood but also anyone in need of healthcare mediation. Moreover, the training class of 2024 (about 34 health mediators) have been specifically certified to work in maternity and paediatric departments at the hospitals.

2.4.2. Addressing the problems beyond the NRSF

The political crisis in Bulgaria⁵⁷ slowed down the implementation of most public policy initiatives and kept the public spending and budgets in a rather conservative mode. At the same time, there have been global dynamic developments in the economy and healthcare services, which have increased the costs of medical services and treatments. Therefore, the state funding for preventive mobile healthcare has not changed significantly in the past four years, but the cost of medical supplies and the price of medical labour have increased. The state experts reported that, due to this situation, in three regions (Haskovo, Silistra and Stara Zagora), no doctors applied for the public procurement tenders that were announced for mobile obstetrics and gynaecology offices

⁵³ https://ec.europa.eu/commission/presscorner/detail/ga/ip_20_1813

⁵⁴ *National Action Plan for NRSF 2024-2027*.

⁵⁵ Ordinance 26 [in Bulgarian], <https://lex.bg/laws/ldoc/2135556407>

⁵⁶ 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>.

⁵⁷ In the period May 2021-January 2025, there were nine governments, of which six were caretaker cabinets.

and mobile fluorography machines. In regions where activities are ongoing, the increased costs of obstetrics and gynaecology consumables in 2024 have reduced the number of preventive check-ups, as outlined in the NRSF action plan. This is due to the size of the budget that was defined in 2022, which was not updated by the caretaker governments.

2.5. Housing, essential services, and environmental justice

The forced evictions of Roma from their homes because the dwellings have been illegally built is one of the most serious housing rights problems in Bulgaria.⁵⁸ The Committee on the Elimination of Racial Discrimination (CERD) has been monitoring the *Yordanova and Others v. Bulgaria* group of cases under the enhanced monitoring procedure for over a decade. In 2023, this group was not subject to review.⁵⁹ No progress was made in implementing the CERD recommendations of September 2022. No amendments to the legislation were made to allow for an assessment of the proportionality of measures to remove illegally built homes and protect vulnerable persons in line with the CERD recommendations.⁶⁰

Due to the failure of Bulgarian courts to recognise discrimination, a current report by the 'Equal Opportunities' initiative shows that EU Directive 2000/43/EC, which prohibits discrimination on grounds of racial or ethnic origin in a number of areas, including housing, is not fully implemented in Bulgaria when it comes to access to housing for Roma. Furthermore, domestic legislation has not been amended to meet the country's commitments under the European Convention on Human Rights and Fundamental Freedoms and the revised European Social Charter (ESC), for which Bulgaria has been criticised. Furthermore, the ESC has asked Bulgaria to ensure access to housing by showing tolerance towards illegal occupants and refraining from evicting them when alternative accommodation is not available.⁶¹ The problem of the Bulgarian courts is that they do not examine whether the principle of proportionality of measures is respected in cases of forced evictions, and the same applies to administrative procedures. This is precisely the essence of the recommendation of the Committee of Ministers, which follows the general measures ordered in the *Yordanova and Others v Bulgaria* judgment – that domestic legislation should be amended so as to ensure that the principle of the proportionality of measures is examined.

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 constitutional law, 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.

However, since October 2023, the 'Procedural Representation of the Republic of Bulgaria before the European Court of Human Rights' Directorate of the Ministry of Justice has been implementing the project 'Strengthening the National Capacity for Effective Implementation of the Judgments of the European Court of Human Rights'.⁶² The aim of the project is to ensure compliance between the actions of the bodies responsible for the implementation of the general measures prescribed by the ECtHR in its case law against Bulgaria and the standards for the protection of human rights, including in the law-making processes and in the field of

⁵⁸ Open Society European Policy Institute, Mihaylova, D., Kachamov, A. (2017) "Roma Evictions and Demolition of Roma Houses: A Sustainable Solution for Roma Integration or a Problem of Roma Discrimination in Bulgaria", <https://www.equalopportunities.eu/bg/reports/roma-evictions-and-demolition-of-roma-houses-bg-2.html> and Open Society European Policy Institute, Mihaylova, D., Kachamov, A. and Kashumov, A. (2022), "Demolition of Roma Homes in Bulgaria", <https://www.equalopportunities.eu/bg/reports/demolition-of-roma-homes-in-bulgaria.html>

⁵⁹ The procedure is associated with the Committee of Ministers: [https://www.coe.int/en/web/execution/decisions-and-interim-resolutions#/%22269538304%22:\[2\]](https://www.coe.int/en/web/execution/decisions-and-interim-resolutions#/%22269538304%22:[2])

⁶⁰ [https://search.coe.int/cm/#/%22CoEIdentifier%22:\[%220900001680a82ac7%22\],%22sort%22:\[%22CoEValidationDate%20Descending%22\]](https://search.coe.int/cm/#/%22CoEIdentifier%22:[%220900001680a82ac7%22],%22sort%22:[%22CoEValidationDate%20Descending%22])

⁶¹ Mihaylova, D., A.E. Kashamov and A.A. Kashamov, *Demolition of Roma Homes in Bulgaria*. Available at https://www.opensocietyfoundations.org/publications/demolition-of-roma-homes-in-bulgaria?utm_source=chatgpt.com

⁶² Projects financed under EEA grants are available at <https://www.eaagrants.bg/programi/pravosdie/proekti/proekti>

administration of justice, and the creation of effective means to prevent future violations. An Action Plan⁶³ has been prepared in connection with the measures for the implementation of the judgments in the group of cases *Yordanova and Others v. Bulgaria*, which group includes the case *Yordanova and Others v. Bulgaria* (application 25446/06), *Ivanova and Cherkezev v. Bulgaria* (application 46577/15), *Paketova and Others v. Bulgaria* (applications Nos. 17808/19 and 36972/19) and *Simonova v. Bulgaria* (application No. 30782/16). This group of cases concerns interference with the applicants' right to respect for their home or their private and family life as a result of seizure orders (of public property) or demolition orders (of illegal construction) issued and subject to judicial review in accordance with domestic law, which did not require any assessment of proportionality (violations of Article 8 of the Convention for the Protection of Human Rights and Fundamental Freedoms, ECHR, Convention). The interim resolution of the Committee of Ministers of the Council of Europe on the implementation of the judgment in the case of *Yordanova and Others v. Bulgaria*⁶⁴ recommended that the legislative process announced in 2019 be finalised and that all persons affected by demolition orders for illegal construction could benefit from a proportionality assessment (even if they or members of their households had no property rights and had not carried out any construction work). The Bulgarian authorities are again invited to ensure that administrative acts which in practice affect the right to the inviolability of the home in a manner similar to orders for seizure (of public property) or removal (of illegal construction) are subject to a proportionality review, in accordance with conditions adapted to the risks involved. The Action Plan aims to implement precisely the prescribed general measure related to ensuring the proportionality review before issuing the relevant administrative acts and aims to provide the institutions with a clear Coordination Mechanism to be activated and followed in cases of forced eviction from residential property.

2.5.1. Effectiveness of the NRSF in addressing the problems

The period 2022-2024 was quite contradictory with regard to the NRSF aims. Despite the 'Strengthening the National Capacity for Effective Implementation of the Judgments of the European Court of Human Rights' and administrative attempts to secure proportionality and protect human rights (as described above), one of the most aggressive and arbitrary evictions of Roma in recent years was carried out in the Sofia district of Orlandovtsi. The small Roma district in this area has been inhabited continuously since the mid-1950s, when wooden shacks were built on land using funds provided by the Sofia municipality, which resettled Roma people whose houses had been destroyed by a flood. In the 1970s, the shacks rotted, and in their place, the inhabitants built small brick dwellings without building permits, but with the tacit consent of the municipal authorities. On 16 June 2023, the Roma living in the district were notified that by 30 June 2023, activities would be undertaken to remove all illegally constructed buildings and clear the land located in the district (24, Orlandovtsi – Malashevtsi area), so they should be freed of residents and movable property. The notes were undated, unsigned, and unsealed, and lacked a specified publisher.

Following an inspection by the Administrative Court of Sofia, it was determined that no order had been issued for the demolition of these homes under the relevant administrative procedure. However, on 6 July 2023, the mayor of the area and administration officials arrived, accompanied by a patrol car with four police officers. Representatives of the Municipality inspected the houses, counted them and filmed them. Representatives of the households were not presented with documents, nor did anyone answer their questions about the possible provision of alternative housing. People were informed that on 17 July 2023, they would be handed an 'official' document with a seal. On 19 July 2023 at 9 a.m., municipality officials arrived on site in the neighbourhood along with several patrol cars. The demolition of several houses began, which continued the next day. The Municipality officials refused to provide the affected people with demolition orders and told them that they would directly demolish the buildings, since the terrain was municipal and there was no need to issue or serve orders. However, the main part of the demolition of the houses took place on August 9 and 10, 2023, again without providing any notice to the affected people. On the same day, the Bulgarian Helsinki Committee filed a request for interim measures with the ECtHR. They were imposed the next day, when more than half of the houses had already been demolished. The court demanded that the demolition of the buildings be stopped and that the residents of those already demolished be provided with alternative accommodation. In the following days, despite the ECHR's decision on interim measures, the remaining houses were demolished, and the residents were provided with some alternatives. Other residents moved out on their own, faced with the lack

⁶³ Non-published document.

⁶⁴ Interim resolution of the Committee of Ministers of the Council of Europe on the implementation of the judgment in the case of *Yordanova and Others v. Bulgaria*, 2020. Available at: <https://hudoc.exec.coe.int/eng/#f%22execidentifier%22-%22001-206991%22%22>

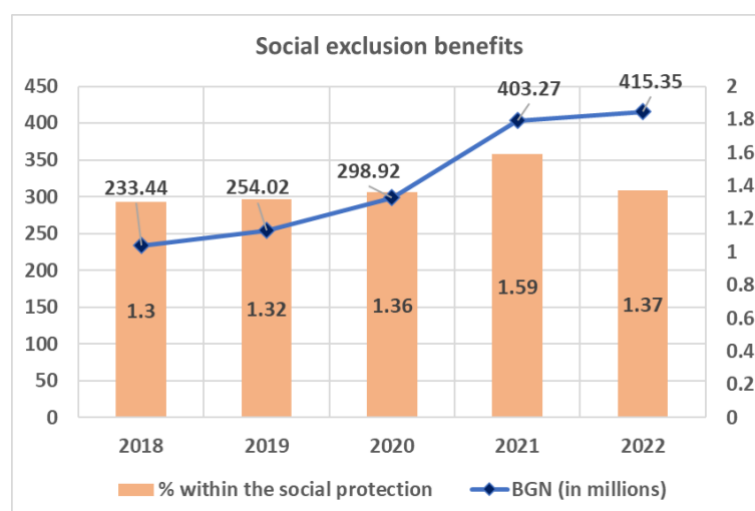
of electricity and water. Some of the alternatives were inadequate. For example, one family was given two scrapped vans on municipal land, where water and electricity were provided by a private business that also uses the land. The vans, which are heated by wood, were to be inhabited in winter by small children, a pregnant woman, and other members of the extended family. The total number of Roma people affected by this eviction is more than 150.⁶⁵

On the other hand, 2024 marked the end of the problem of ‘illegal residence’ – namely, the large number of people living without personal documents due to their living in informal dwellings. An amendment was made to the Law on Civil Registration, and the concept of ‘a service address’ was introduced. If it is impossible for persons living in an informal dwelling to register at an alternative address, they may register at an official address provided by the municipality. Registration of such an official address may be carried out in the municipality at the person’s last registered address, if any. Additionally, the rules for applying for a municipal dwelling (public housing at discounted rent) were also changed, allowing persons without formal address registration to apply.

2.6. Social protection

The social protection system in Bulgaria includes allowances on the grounds of sickness, disability, old age, survivors, children, unemployment, housing, and social exclusion. The last covers the most vulnerable population living in poverty. The money is distributed through 265 municipalities and covers social food, heating benefits, etc. Data for the period 2018-2021 shows that it accounts for approximately 1.3% to 1.6% of the social protection budget, with a peak in 2021 reflecting increased post-COVID vulnerability. All the measures are mainstreamed, and there is nothing that explicitly targets Roma, but expert opinions are that the Roma people and rural elders are de facto the main beneficiaries of these funds. This issue partially relates to Measure 4.4. in the “Employment” chapter of the National Action Plan.

Access to social protection is strictly dependent on the possession of ID documents and official residence registration. The previous RCM report flagged that the most vulnerable Roma are practically excluded from social protection, as well as social and health care services, due to their lack of ID cards, as a result of a lack of residence registration. The authors of this report hope that, following the changes to the Civil Registration Law and the introduction of the ‘service address’ concept in 2024, access to social protection will improve during the next monitoring period.



Source: National Statistical Institute⁶⁶

As explained in the previous RCM report, the NRSF’s aims and measures are insufficient and promote awareness raising, but not sufficient grassroots social protection or prevention of trans-generational poverty in the Roma

⁶⁵ BHC, 2024. Human rights in Bulgaria in 2023. Available in Bulgarian at: <https://bghelsinki.org/bg/reports/human-rights-in-bulgaria-in-2023>

⁶⁶ National Statistics Institute, *Social Protection Expenditures*, available at: <https://www.nsi.bg/en/content/4078/social-protection-expenditures>

communities. The Social Assistance Agency does not collect data based on ethnicity. All the measures and indicators are mainstreamed, making it very challenging to evaluate efficiency, effectiveness, and impact in the future. In general, obtaining access to social assistance is rather an intricate procedure, particularly for those Roma who have a low-level or incomplete education or those who reside in small or remote villages, without a social assistance office. For some Roma, filling out the forms and attaching all the required documents to the files can be a real challenge. It is often reported that healthcare mediators or civil society activists assist Roma, as there is not always a social assistance staff member willing to help. 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 the 'Implementation of the Social Assistance Law' are required to engage in four hours of daily labour for a period of 14 days associated with public services; in return, they receive approximately 158 BGN per month (≈80 EUR), which is about 30% of the income that defines the poverty line in 2024, and Roma often refuse to participate or do not apply for assistance. Despite being de facto a form of state labour exploitation, this issue remains unaddressed in the NRSF, although it was addressed in the previous RCM reports.

2.7. Social services

At the beginning of 2019, a new Social Services Act (SSA) was adopted, which entered into force in July 2020. 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 an awareness of 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..."

The SSA empowers municipal authorities to utilise social services as a tool to reduce social exclusion. It broadens access not only among conventional users of social services (such as persons and children with disabilities, as well as the elderly alone and people with reduced mobility), but also among other vulnerable groups, such as people without education, the long-term unemployed, and socially excluded ethnic communities. However, a recent study on the practical implementation of 'community work' and 'mobile preventive community work' in Roma communities, conducted in 2023 by ROMACT Bulgaria, shows that both concepts are not sufficiently developed and moreover completely absent in the bylaw framework. Furthermore, the structural needs assessment indicators of the National Map of Social Services include only basic criteria, mainly related to the total population registered by the National Statistical Institute (NSI) during the 2021 Census. This situation serves as a social bottleneck, further limiting the access of the most vulnerable adults and children to adequate social services. The most marginalised groups usually live in segregated informal dwellings and therefore do not have a permanent residence registration. Consequently, such people do not have personal documents and become 'invisible' to social services, the healthcare system and the educational system, further having no access to regulated employment opportunities (legal contracts). In all seven ROMACT municipalities covered by this research, it was reported that households located in informal dwellings were not covered by the enumerators during the 2021 Census. The analysis of the local social mapping and needs assessment activities shows that there are no targeted measures for Roma marginalised communities, nor for quarters with informal dwellings, or neighbourhoods with households living predominantly below the poverty line. This lack of public policy and action is often justified by local authorities as a result of the absence of these groups from the Quality Ordinance and Planning Ordinance related to the SSA. However, the absence of the Roma marginalised population and informal quarters from the bylaw regulations indicates the lack of coherence of those documents with the pre-existing strategic regulatory framework in the country. For example, the National Strategy for Poverty Reduction and the Promotion of Social Inclusion 2030, as well as the NRSF.⁶⁷

The ROMACT study reveals that, instead of building integrated services on-site, there is an additional segmentation and spatial scattering of services. Instead of putting the individual and communities at the centre

⁶⁷ "They Are Treated as Cases, not People" (Analysis of the application of the Social Services Act with regard to preventive community work in Roma communities and in neighbourhoods with a concentration of poverty in Bulgaria, in the context of development of the national map of social services). ROMACT, 2023

of services, there are more administrative procedures and deepened institutionalisation related to the existing physical infrastructure. All of this jeopardises social service provision in Bulgaria by increasing the risk of the disruption or deprivation of access to social services – especially in the remote rural areas and municipalities with higher poverty rates, which is exactly the opposite of the original goals of the SSA (Rules of Implementation and the Quality and Planning ordinances).⁶⁸

A substantial revision of the bylaw framework of the SSA is needed, as follows:

1. The immediate provision of social services upon informal identification of risk or need, followed by expedited processes of formal identification.
2. The differentiation of efficiency criteria with regard to the population size of the municipality. Social services are economically more efficient in regional administrative centres, but this currently reduces access and, instead of providing integrated services in situ, produces segmentation and scattering, for example: consultation in one village, rehabilitation in another, and sheltering in a third.
3. The detailed and comprehensive development of the concepts of ‘community work’ and ‘community prevention’ in order to help provide adequate and permanent primary, secondary and tertiary prevention in communities or on an ad hoc basis, not only in a short-term manner and through campaigns, as planned at the moment, but in a permanent manner, whenever needed; also, securing the inclusion of the local community in the public policy consultation process.
4. Ensuring coherence between the SSA bylaw framework and pre-existing national legislation concerning specific vulnerable groups: Roma, adults and children seeking international protection, and adults and child victims of human trafficking or domestic violence. This is needed to cover the ‘maximum wide range of people in need’, not only adults and children with physical and mental disabilities or individual elderly people.

2.8. Child protection

The focus of child protection efforts is still largely on responding to abandonment and promoting alternatives to residential care, rather than supporting parent-child relationships within the family environment. Limited cooperation and coordination remain a general weakness of the child protection system. Most of the primary and secondary legislation within the child protection framework contains an explicit provision prohibiting discrimination. Despite this, however, the Social Assistance Act (SAA) and the Child Protection Law (CPL) also include provisions that withhold access to social benefits and allowances in cases when children are not vaccinated or do not regularly attend school. Given that certain social groups, such as Roma, face greater challenges in terms of access to education and healthcare, these restrictive provisions can be considered highly discriminatory, especially in light of the fact that the prevention limb of the child protection system remains underdeveloped. Despite the scarcity of relevant ethnically disaggregated data, it can be surmised that Romani children are more likely to be removed from their families and placed in alternative care than children of other ethnic groups in the country. Survey findings include that:

- The main reasons for leaving a child in an institution are a lack of financial resources and adequate conditions for raising them due to poverty.
- Over half of the children placed in the examined facilities for state care were of Romani origin.
- The quantitative survey indicates that the decision to place a child in institutional care is typically made either immediately after birth or even before the child is born. This underscores the importance of commencing abandonment prevention efforts as early as possible during pregnancy. To achieve this goal, support should encompass both pregnancy and the period immediately following birth.
- 63.3% of respondents stated that people in their neighbourhood were scared that social services or the Child Protection Directorate might take away their children, with 29.2% of respondents believing that parents in their neighbourhood often had such concerns. Over half of respondents, 50.4%, believed that social workers may not be working in the child’s best interest to help them remain within the home environment.

⁶⁸ ROMACT, 2023, op. cit.

- The qualitative research points out that, because of widespread stereotypes and discrimination, Romani children are less accepted by foster families, and as a result, many of them are instead placed in state institutions.
- The research also reveals a significant gap in policies and implementation practices related to the prevention of separation and removal of children from the Romani community.⁶⁹

Another issue related to child protection is the existence of child marriages and forced marriages in some Roma communities. In the previous RCM report, the need for targeted preventive measures (which were missing) was especially underlined. The argument of the public authorities at the time was that it was not included in the NSFR, as it would be included in the 'National Programme for Prevention of Violence and Child Abuse' (NPPVCA). The NPPVCA was issued in 2023, covering approximately 600 cases on an annual basis for the period 2019-2021,⁷⁰ but in its Action plan 2023-2026, there are no real preventive measures with regard to early marriage. There are three measures labelled 'preventive', but they do not involve real community work, investigation, or prosecution. The preventive work is limited to 'training of pedagogical staff' (who are actually not empowered to combat child marriages); moreover, such marriages are typical of communities where children are not enrolled at school (i.e. the training content does not reflect the reality), and meetings with health mediators (who are aware of such developments but are not empowered to stop them either, because it is not in their job description). There are no specific indicators, assessment of the population at risk or benchmarks, and there are no specific targeted budgets. Moreover, Measure 9.1. defines the objective "Trained pedagogical staff who can appropriately educate children on issues related to sex education and communication" (p.12). At the same time, with an amendment to the law on preschool and school education in August 2024, the possibilities for teachers to discuss issues such as gender and sex were definitively limited, i.e., the strategy is jeopardised by the change in general legislation.

There is a major problem obtaining justice for children in Bulgaria. The juridical system is not very well prepared to work in a sensitive manner, and the rights of children in conflict with the law are often overlooked, a recent study has found. Although Bulgaria has made efforts to establish the 'Blue room' practice over the past several years, there is still an insufficient number of specialised investigators, prosecutors, and judges. Additionally, there is no standardised mechanism requiring the attendance of a social worker.⁷¹

Greater emphasis should be placed on the prevention of child abandonment and removal in primary child protection legislation, in particular by creating stronger measures for supporting parents and reducing the need for alternative care. The enactment of public policies on child protection at the national and local levels should be conducted in collaboration with CSOs actively working in the field of childcare. Central and local authorities should implement a focused survey to investigate the reasons behind the separation of Romani children from their families and adopt measures specifically targeted at preventing removal on account of socio-economic factors.

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

The administrative report of the Ministry of Culture keeps reproducing the same statement each year:

"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."⁷²

⁶⁹ ERRC, 2024. Forgotten Futures. Available at: <https://www.errc.org/reports--submissions/forgotten-futures-romani-children-in-state-care-in-bulgaria>

⁷⁰ NPPVCA, p. 12, available at: <https://sacp.government.bg/sites/default/files/politics/nacional-program-nasilie-i-zloupotreba.pdf>

⁷¹ Pushkarova, I., Pamporov, A. 2024. Themis sees the child. Sofia: Association of the Prosecutors in Bulgaria. Available in Bulgarian at: <https://prokurori.bg/index.php/download/temida-vizhda-deteto-2>

⁷² Administrative Monitoring Report On the Implementation in 2023 of the National Strategy of the Republic of Bulgaria for Equality, Inclusion and Participation of Roma People (2021 - 2030), p. 85; Administrative Monitoring Report

This bureaucratic cliché is widely replicated through administrative plagiarism and can be found not only in the NRSF and administrative monitoring reports, but also in many municipal and regional strategies (for example, Sofia, Belogradchik, Smollan, Berkovitsa, Vratsa, etc.). Unfortunately, it involves an act of formally acknowledging Romani culture, but in practice, there are no targeted measures aimed at the Romani culture. It remains the least developed chapter in the NRSF, and the administrative reports of the Ministry of Culture are composed of misleading information and hollow phrases. Officially, all the measures are mainstreamed, and Roma performers and organisations have the right to compete. Since there is no Roma history museum, Roma art gallery or permanent Romani culture exhibition in any national or regional museum, this is a clear case of hidden structural discrimination. Roma CSOs lack the capacity and infrastructure to compete with state and municipal museums and galleries. In the previous report, it was emphasised that, despite the monitoring recommendations from the previous strategic period, no changes have been made to the design of the measures or the Ministry of Culture's approach. We must repeat this conclusion. The Ministry of Culture does not implement effective measures with a sustainable impact to promote and encourage Romani culture and Romani artists.

3. FOCUS ON KEY PROBLEMS AFFECTING ROMA

3.1. Education: Segregation, early school leaving and dropout

Segregation in education remains one of the main problems that hinder the education of Roma children in Bulgaria.⁷³ The NRSF points out that:

“Despite the improvement of the educational structure of the population, there are still some challenges, as well as alarming signals for the quality of education. The share of Roma students attending schools with mixed ethnicities has almost halved. The share of students in schools where there is a concentration of students of Roma origin is increasing – almost every second child of Roma ethnic origin is enrolled in a school where Roma predominate.”⁷⁴

It also outlines the main negative factors obstructing the quality education of Roma, including “primarily segregated educational institutions” and “the expanding process of the so-called secondary segregation of educational institutions.”⁷⁵ A survey conducted by the Centre Amalipe and the Ministry of Education in 2020 shows that 1,080 schools have a “concentration of vulnerable students” (a term used by MES for students whose parents have less than secondary education). Most of them are rural schools, while 185 general schools and 150 VET gymnasiums could be defined as “segregated / in process of segregation”, being situated in cities or towns with more than one school.⁷⁶

As explained in detail in the 2018 RCM report, ensuring full enrolment, decreasing drop-out and early school leaving rates have become a political priority for the Bulgarian governments since 2017.⁷⁷ This is also stressed in the new NRSF. In general, there is strong political consensus and public support for this policy, while the efforts at desegregation are not considered as part of ensuring full enrolment and are meeting certain resistance, both at the national and municipal levels.

3.1.1. Effectiveness of the NRSF in addressing the problem

The present Bulgarian NRSF explains in detail the challenges facing the education of Roma, including segregation.⁷⁸ It sets one general objective linked with desegregation in the Education and Training priority, namely:

“4. Improving the quality of education, upbringing and socialisation in educational institutions with concentration of children and students from vulnerable groups, including Roma, as well as overcoming the processes of segregation in kindergartens and schools located near Roma neighbourhoods, prevention of secondary segregation.”⁷⁹

This objective is composed of three different parts, namely increasing the quality of education and socialisation in the segregated schools, overcoming segregation, and preventing secondary segregation. On the one hand, it is a positive trend to perceive the complexity of desegregation, which includes overcoming pre-existing segregation, the prevention of secondary segregation and support for quality education in existing segregated schools. This properly reflects the situation with the educational institutions in Bulgaria. As explained above, a large number of segregated institutions (schools and kindergartens) function in almost all district centres and

⁷³ Zahariev, B. and Deyan Kolev, *Karta na uchilishtnata segregacia v Balgaria* (Map of school segregation in Bulgaria), pp. 9-15.

⁷⁴ *National Strategy of the Republic of Bulgaria for Equality, Inclusion and Participation of the Roma (2021-2030)*, p.8.

⁷⁵ *National Strategy...*, pp. 8-9.

⁷⁶ Zahariev, B. and Deyan Kolev, *Karta na uchilishtnata segregacia v Balgaria* (Map of school segregation in Bulgaria), p.20.

⁷⁷ RCM, *Civil society monitoring report on implementation of the national Roma integration strategy in Bulgaria – 2018*, pp.45-46.

⁷⁸ *National Strategy...*, pp. 8-9.

⁷⁹ *National Strategy...*, p.24.

in most of the smaller towns.⁸⁰ The desegregation process cannot be successful without raising the quality of education in the schools with a concentration of Roma, since enrolling children from them in the ethnically mixed schools requires overcoming the gap between segregated and integrated schools. In addition, the number of segregated schools is almost the same as the number of schools in the process of segregation, which indicates the strengthening of segregation. This is why it is important to undertake efforts both for the desegregation of pre-existing segregated schools and to prevent the menace of secondary segregation. On the other hand, it is a negative peculiarity that NRSF does not use the term 'desegregation' – it is used only in the National Action Plan.

The National Action Plan for NRSF 2022-2023 contains only two specific measures for desegregation. They repeat the existing measures at present (since 2018): National Program for supporting municipalities for desegregation and procedures/calls for proposals coordinated by the Centre for Educational Integration of Children and Students from the Ethnic Minorities. The amounts envisaged are the same as the existing ones. Although these amounts are very low and insufficient (250,000 EUR, while the interest is doubled), the NAP does not increase them. Although the Education Programme plans more significant amounts for desegregation,⁸¹ the NAP does not include them. It is only a descriptive document, not a prescriptive one, and its added value is very limited. The same applies to the new NAP 2024-2025.⁸²

It is worth mentioning that neither NAP nor the NRSF includes desegregation operations financed by the Education Programme (ESF co-funded programme). The last one supports special operations for desegregation and the prevention of secondary segregation within the ITI (Integrated Territorial Investment) approach and within a national call. Their amounts are significantly larger: e.g., the national operation for supporting desegregation is backed up with 14.6 million EUR.⁸³ Here (as in many other places), we can observe the lack of links between NRSF planning & implementation and the implementation of EU Funds.

3.1.2. Synergy with other actions

Desegregation measures are also included in the 'Strategic Framework for Development of Education, Training and Learning in Bulgaria (2021-2030)', Goal 5.6: "Promoting school desegregation and forming a supportive public environment".⁸⁴ They also form part of the Education Programme (ESF co-funded programme): "Priority Axes 1, Specific objective: ESO4.10. Promoting the socio-economic integration of marginalised communities such as Roma". This includes "2. Comprehensive programmes at municipal level for desegregation of schools, prevention of secondary segregation and against discrimination" with six sub-activities.⁸⁵ As a result, the Education Programme finances calls and projects for desegregation. Additionally, desegregation activities are incorporated into other calls and operations.

The state budget finances the National Program for Supporting Municipalities for Desegregation and Prevention of Segregation. The associated amount is low – 250,000 EUR annually, which cannot meet the growing interest of different municipalities to implement desegregation activities. When the programme was announced in 2018, the amount was double. Nevertheless, the existence of this programme and the fact that it is financed by the state budget are positive facts.

Projects for desegregation and the prevention of segregation are part of annual programmes and the strategy of the Centre for Educational Integration of Children and Students from Ethnic Minorities. The associated amount is also very small – the entire budget of the Centre is 500,000 EUR annually, and it has not been raised since 2006. The amount dedicated to desegregation projects is around 100,000 EUR. Nevertheless, the fact

⁸⁰ Zahariev, B. and Deyan Kolev, *ibid*, pp. 37-99

⁸¹ The operation "Comprehensive programmes at municipal level for desegregation of schools, prevention of secondary segregation and against discrimination" was approved by the Monitoring Committee of Education Program on 27 November 2024.

⁸² *Natsionalen Plan za Deistvie za perioda 2022-2023 godina (National Action Plan for the period 2022-2023)*, pp.20-22.

⁸³ Executive Agency Program Education, <https://sf.mon.bg?qo=committee&p=records>

⁸⁴ *Strategic Framework for Development of Education Training and Learning in Bulgaria (2021-2030)*, pp. 30-31.

⁸⁵ *Programa Obrazovanie (Program Education)*, pp. 40-41.

that the Centre is a structure of the Ministry of Education and it uses the state budget is also positive and inspiring.

3.1.3. Roma participation

Roma organisations have contributed to the preparation of the NRSF, prioritising Education and Training, and the inclusion of anti-segregation texts, following their suggestions. Centre Amalipe, the World Without Borders Association, and New Road Association were among the active CSOs that participated in the preparation of the Strategic Framework for Development of Education (2021-2030) and advocated successfully for including the desegregation priority in it.⁸⁶ Amalipe participates in the Consultative Council of the Strategic Framework.

Roma organisations were one of the most active groups in preparing the Education Programme. Their representative in the Working Group for the Preparation of the Education Programme, Deyan Kolev, suggested including the “Specific Objective ESO4.10. Promoting the socio-economic integration of marginalised communities, such as Roma” in the Programme. They also participate actively in the Monitoring Committee of the Education Programme, actively announcing the desegregation calls.

3.2. Difficulties with registration

A significant number of Roma in Bulgaria face severe barriers to obtaining identity documents due to their inability to register at a permanent address – a legal prerequisite. As of March 2021, over 244,000 people lacked valid ID, with more than half never having had one.⁸⁷ This disproportionately affects Roma communities, especially youth and young women, and results in the denial of basic rights such as education, healthcare, employment, and legal recognition. The root issue lies in restrictive legal requirements linking address registration to property ownership and inclusion in the National Address Register, which excludes many informal or marginalised settlements. Though a procedure exists via municipal Address Registration Commissions, these bodies lack legal authority and rarely function in practice. The affected individuals often encounter administrative refusals and are unable to appeal, further entrenching poverty and social exclusion.

3.2.1. Effectiveness of the NRSF in addressing the problem

The Bulgarian NRSF reflects this serious problem only partly. It is specifically mentioned in Part VII, “Priorities, 5. Rule of law and anti-discrimination”. Among the general objectives of this part is “8. Solving the problem with the lack of identity documents and legal status of Bulgarian citizens from vulnerable communities, including Roma.”⁸⁸

In addition, the same part of the Strategy includes actions intended to: “Raise the legal awareness and civic culture of Roma, especially concerning obtaining and maintaining personal identity documents,” and “Increase civic awareness and participation among individuals living in poverty-concentrated areas.”

Although the Strategy acknowledges the issue at a general level, it does not provide detailed mechanisms or administrative solutions to address registration procedures. These are expected to be developed and specified in the future Action Plan that will accompany the Strategy.

3.2.2. Synergy with other actions

As a result, municipal authorities and administrations have identified a significant problem related to registration at a permanent address, and, consequently, the issuance of identity documents. According to data collected by municipal administrations, the group of affected people includes, first and foremost, people living in Roma neighbourhoods. The reasons for this are, first of all, the mass lack of property documents or other documents awarding the right to live in the properties in which the persons wish to register; the illegality of the

⁸⁶ Amalipe, *The Strategic Framework for the Development of Education (2021-2030) will include the educational integration of children and students from ethnic minorities*. Available at: <https://amalipe.bg/en/the-strategic-development-framework-2021-2030-will-include-the-educational-integration-of-children-and-students-from-ethnic-minorities/>

⁸⁷ ROMACT, 2022, Analysis of the challenges concerning registration at a permanent address and possession of identity documents of persons living in homes without valid lawful basis. Available at: https://www.coe-romact.org/sites/default/files/romact_resources_files/Final_Report_Address%20registrationIDs_ENG_0_0.pdf

⁸⁸ National Strategy of the Republic of Bulgaria for Equality, Inclusion and Participation of Roma, p.34

inhabited buildings, which is a reason for the exclusion of the addresses from the National Classifier of Addresses in the Republic of Bulgaria; and overcrowding at certain addresses, which does not adhere to the limits of the Civil Registration Act (CRA) regarding the number of persons who can be registered at a certain address.

According to the information gathered by the Ministry of Interior, the issuance of an identity document is linked to the existence of an up-to-date registration at a permanent address existing in the National Classifier. The representatives of the Ministry of Interior, who in practice issue identity documents, have stated that their electronic system does not allow the issuance of a document when the applicant is not registered at a permanent address in the National Classifier system.

3.2.3. Roma participation

The representatives of civil society organisations working with affected persons continue to provide information that the problem of registration at a permanent address in Roma neighbourhoods is widespread.

Roma and pro-Roma CSOs have advocated for years for a solution to the problem. However, the unstable political situation in Bulgaria prevented advocacy efforts until October 2024, when Parliament finally passed amendments to the Civil Registration Act, which provide for the establishment of an ex officio municipal address for persons with no real estate properties or legal documents. There are still some problems related to the provision; namely, the municipalities have no obligation to be responsible for the official correspondence of the people registered with an ex officio address; however, the affected persons can at least obtain identity documents.

3.3. Healthcare

The unsatisfactory health status of the Roma is among the traditional problems of the Roma in Bulgaria. (Please see the healthcare chapter of the earlier RCM report from 2020⁸⁹).

There have been some optimistic developments in recent years. For example, the increase in the number of doctors, nurses and other specialists, as well as students of medicine of Roma origin. It is also important that most of them are willing to return to help. Sasho Emilov, who graduated from the Medical Academy in Plovdiv with excellent results and is now a medical intern, says:

“I met with many patients, including those from minority groups. I get the impression that people from the Roma ethnic group TODAY are more interested in their health and the health of their children – prophylaxis, immunisations, prevention against viruses, etc.”

According to Emilov, this may be due to both the increased education of the younger Roma generations, but also to the lessons learned from the COVID-19 crisis, during which the mortality rate among the Roma minority was particularly high.⁹⁰

Young Roma doctors (over 240) have also contributed to this tendency, having received support in recent years from the ‘Mentoring Support for Students of Roma Origin Studying Health Majors’ of the Trust for Social Alternative and the ‘Active Citizens Fund’ Bulgaria. This is one of the measures also aimed at addressing one of the main problems with Bulgarian healthcare – the shrinking of the number of medical personnel, especially nurses, midwives and paramedics (according to OECD data,⁹¹ Bulgaria is in penultimate place for this indicator). The state has also supported the network of health mediators created to improve access for Roma: for 2023-2024, there are 320 of them. However, health mediation is not equivalent to medical care, but a social service in the healthcare system. The main problems remain – a high share of uninsured Roma, the unmet health needs of low-income households, low levels of cancer screening, and low levels of vaccination.

⁸⁹ RCM, *Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Bulgaria*. Available at: <https://romacivilmonitoring.eu/wp-content/uploads/2023/07/RCM2-2022-C1-Bulgaria-FINAL-PUBLISHED-CATALOGUE.pdf>

⁹⁰ <https://factcheck.bg/vyarno-e-che-balqariya-e-sred-parvite-po-izvanredna-smartnost-po-vreme-na-pandemiyata-ot-kovid-19/>

⁹¹ EC, Bulgaria. *Country Health Profile 2023*. Available at: <file:///C:/Users/Acer/Downloads/chp-bulgaria2023.pdf>

3.3.1. Effectiveness of the NRSF in addressing the problem

The feasibility of the NRSF measures is in doubt during this period, as some indicators were not met in the previous two-year period. For example, screening examinations with a mobile mammogram in the older plan were associated with a minimum target of 1,000 examinations and by 2023 of 2,000, while in the next plan the minimum baseline – referring to the year 2022 in both plans – was reduced to 600, because this is how many were reported in the Administrative Monitoring Report on the implementation in 2022 of the NRSF. And in the subsequent 2023, only 763 examinations were reported, so the goal of 2,000 examinations for 2022–2023 has not been met – the non-fulfilment rate is over 40%.⁹² Accordingly, the goal for four years from now has been reduced to only 2,400. It is unclear why the baseline in the new plan for ‘Obstetric and Gynaecological Examinations with Mobile Offices’ is 1,600, while in the old plan for the same, the baseline was 1,000, etc.

More worryingly, regarding ‘Explanatory campaigns on the need for vaccination,’ no increase in their intensity or diversification is planned. However, it is known that in this field, Bulgaria performed particularly poorly in the past COVID-19 epidemic:

- Bulgaria registered the highest excess mortality rate in the EU during the COVID-19 pandemic, and one of the highest in the world.
- According to some models for assessing excess mortality, Bulgaria is ranked in first place in the world.
- In 2021, a historical national ‘record’ was set with the highest mortality rate since 1945. As of 2022, Bulgaria ranked second in the world, after Peru, in terms of COVID-19 mortality per million population and first in excess mortality, according to a state-commissioned expert report on COVID-19 mortality in the country.⁹³
- According to the Economist, 72,400 excess deaths occurred over the period, of which over 38,200 are directly attributable to COVID-19, with a mortality rate per 1,000 inhabitants of 1,067.⁹⁴

According to the analysis by the European Observatory on Health Systems and Policies, ‘Bulgaria: Country Health Profile 2023’, “excess mortality during the pandemic is high.” This represents a broader estimate of direct mortality due to COVID-19, including possible cases in which COVID-19 mortality is attributed to other causes, cases of incomplete reporting, as well as mortality possibly due to problems with the provision of health services during the pandemic. Overall, during 2020 and 2022 in Bulgaria, there were more than 60,000 deaths (final data: 72,400) above the average annual number, which is 20.2% above the baseline for past periods and more than the EU average.” Accordingly, life expectancy at birth in Bulgaria is the lowest in the EU at 74.3 years.⁹⁵

There is a scientific consensus on the primary reason for this negative ranking – the extremely low vaccination rate in Bulgaria, including the low rate of second-dose COVID-19 vaccinations. Bulgaria’s first place in mortality correlates perfectly with its last place in vaccinations in Europe. And the contribution of the Roma minority to this tragic ranking was particularly large – in their case, vaccination rates were extremely low, lower than the average for Bulgarians, and mortality was correspondingly even higher. In the special study of Roma communities in Bulgaria by an Open Society team called ‘Attitudes towards vaccines and vaccination against COVID-19 in five Roma communities in Bulgaria’,⁹⁶ only 8% of Roma disagree with the statement that vaccination against Covid-19 poses a great health risk – the remaining 66% consider vaccination dangerous,

⁹² <https://www.strategy.bg/StrategicDocuments/View.aspx?lang=bg-BG&Id=1676> pp.26-31

⁹³ Dnevnik, *Zagubeni sa 860 000 godini zivot. Eksperten doklad prouchi smurnostta ot Kovid 19 v Balgaria* (Expert report researched the mortality from Covid 19 in Bulgaria). Available at: https://www.dnevnik.bg/zdrave/2022/11/25/4418191_zagubeni_sa_860_hil_godini_jivot_eksperten_doklad/

⁹⁴ *Economist*, *Tracking covid-19 excess deaths across countries*. Available at: <https://www.economist.com/graphic-detail/coronavirus-excess-deaths-tracker>

⁹⁵ *OECD/European Observatory on Health Systems and Policies (2023), България: Здравен профил на страната 2023, State of Health in the EU*, OECD Publishing, Paris/European Observatory on Health Systems and Policies, Brussels. P.4

⁹⁶ OSI – Sofia, *Attitudes to Covid-19 vaccines and vaccination in five Roma communities in Bulgaria*. Available at: https://osis.bg/wp-content/uploads/2022/10/2022_Covid-19-vaccines-ENG-final.pdf

and 26% are uncertain. Disagreement with the statement that vaccines against COVID-19 are only intended to increase the profits of the pharmaceutical industry is expressed by only 9%, but 73% believe this. Even after the peak of the pandemic in 2021, only 4% of respondents in the Roma communities who were covered stated that they had received at least one dose of vaccine. The majority of participants in the study claimed that they would not get vaccinated against COVID-19 under any circumstances, even if vaccines became mandatory.

A total of 83% of respondents identified at least one of the conspiracy theories about this phenomenon as true. Approximately one in two believed that vaccines against COVID-19 contain harmful substances, lead to infertility and sterility, and do not contribute to reducing the risk of death in case of infection. One in three (38%) believed that vaccines implant chips. These beliefs are in direct contradiction to the main messages of health institutions, indicating that the official institutional sources of the Bulgarian state have either been poorly represented in the vast information flow on the topic or have lost the battle for the attention and trust of the public in the communities under study.

However, among the rest of the population, there is no noticeable improvement in the vaccination rate with the second booster dose against COVID-19. In 2022, only 4% of people over 60 years of age in Bulgaria had received the second booster dose of the COVID-19 vaccine, compared to 36% in the EU. As of August 2021, the approximate share of the Bulgarian population who had received two doses of the vaccine was 17% compared to 54% in the entire EU (But among the Roma minority, it was still lower).

This is how Bulgaria ended up in tragic first place in Europe in terms of mortality from the pandemic. Regardless, we do not see sufficient measures outlined in the Plan for the modern and effective health education of the population.

There is also good news, however. One is the observation that the Roma are more concerned about their health. Perhaps as a result of this, more have registered with a general practitioner – 90% (with an average of 95.4% for the country), and there is also more health insurance among the Roma – on average, 62.2% of the Roma, although only 39.3% of people aged 18-65 have regular health insurance. This is progress, but still insufficient – for comparison, the share of people with health insurance is 90.1% for ethnic Bulgarians and 78.2% for Turks.⁹⁷

Roma seek specialised medical or surgical consultations with specialists much less frequently than representatives of other groups. Only 13.6% of Roma used such services during the year (by comparison, 27.6% of ethnic Bulgarians and 23.2% of Turks used specialised medical services).

Prejudice and discrimination reinforce all the structural barriers to the use of health services. More than ten per cent (10.6%) of Roma report that they have felt discriminated against in accessing health services, which is approximately six times the share of those who identify as ethnic Bulgarians (1.8%).

The low incomes of the majority of Roma also affect their health status. For example, in 2019, women in Bulgaria in the highest income quintile reported higher rates of breast cancer screening (54.1%) than those in the lowest income quintile (18.4%), and in the last two years, 60.3% of women in the highest income quintile had undergone cervical cancer screening compared to only 22.1% of women in the lowest income quintile. These are the largest income-related disparities across the EU.

3.3.2. Synergy with other actions

There are many examples of this – for example, the 'Maternal Healthcare' programme of the National Health Insurance Fund, which is included in Regulation No. 8 on preventive examinations and medical check-ups and Regulation No. 26 on the provision of obstetric care to uninsured women and for conducting examinations outside the scope of mandatory health insurance for children and pregnant women.

An achievement is the right of uninsured pregnant women to four preventive examinations per year, as well as hospitalisation for high-risk pregnancies up to twice a year on a clinical pathway. The initiative for changing the Regulation was supported by the National Network of Health Mediators, the CSO Club, the Largo Association, the Thirst for Life Association– Sliven and dozens of non-governmental organisations and specialists, including

⁹⁷ Tomova, I., L. Stoychev, *Osnovni pokazateli za socialno priobstavane i osnovni prava v Balgaria (Key Indicators for Social Inclusion and Fundamental Rights in Bulgaria)*; p.39

the National Network for Children and also the Bulgarian Medical Union and the Union of Obstetricians and Gynaecologists and Paediatricians.⁹⁸

The Regulation also regulates a pregnant woman's right to choose a medical facility. Uninsured pregnant women will now have the right to an obstetric ultrasound twice during pregnancy. They will also be able to benefit from a full package of medical and diagnostic examinations, three times.

The NRSF is also supported by the 'National Program for Prevention and Control of HIV and Sexually Transmitted Infections in the Republic of Bulgaria (2021-2025)', and, in particular, the dedicated Chapter c. "Marginalised ethnic communities at risk" complements and strengthens Measure 2.1. "HIV prevention and control activities" through anonymous and free counselling and testing services for HIV and sexually transmitted infections in mobile medical offices defined in the National Action Plan.⁹⁹

The National Strategy for Child and Adolescent Health and Paediatric Care 2030, adopted in 2024, aligns with the NRSF.

So are the measures provided for in the National Map of Long-Term Health Needs, for example, in its section on areas not covered by medical care, many of which are Roma.¹⁰⁰

3.3.3. Roma participation

Roma organisations have taken part in preparing the NRSF's section on Priority Health. In addition to the above-mentioned active participation of Roma organisations in the creation and implementation of Regulation No. 26 on the provision of obstetric care to uninsured women, we must definitely note the activities of the National Network of Health Mediators, which affect many of the areas of the NRSF.

3.4. Fighting antigypsyism and discrimination

The 'National strategy of the Republic of Bulgaria for equality, inclusion and participation of the Roma (2021-2030)' is a fundamental document that was adopted by the Bulgarian government with the aim of outlining the guidelines and measures for improving social integration, equality and participation of the Roma community in public life. The main goal stated in the strategy is to reduce social isolation and discrimination against the Roma. This should provide opportunities for full participation in the country's social and economic life, in their role as full citizens. The strategy aligns with the European Union's general guidelines for social inclusion and non-discrimination.

3.4.1. Effectiveness of the NRSF in addressing the problem

The NRSF is based on good European and leading national practices. In its introduction, it is written that:

"Not all Roma are subject to social exclusion, but all of them can become subject to discrimination and be disenfranchised."

The introduction clarifies the framework that Roma or groups that have similar problems to Roma can be victims of different types of discrimination, which includes both the personal and institutional levels. The fight against discrimination and anti-Roma sentiments is a key component of a comprehensive, interdepartmental, and multi-layered strategy that can significantly impact other important elements, such as education, healthcare, and social activities. In order to obtain a real idea about the situation of the Roma and discrimination, numerous consultations and public discussions have been held, which are in accordance with the law and include the participation of representatives from the public and civil sectors.

An EU-MIDIS II study from 2020 observed that around 61% of EU citizens consider that discrimination against the Roma population is a widespread phenomenon in EU countries. The research finds that deep-rooted,

⁹⁸ NMD, *Ot 2023 bremennite zheni ste imat pravo na razshiren paket ot zdravni uslugi* (From 2023, uninsured pregnant women will be entitled to an extended package of health services). Available at: <https://nmd.bg/ot-2023-q-neosigurenite-bremenni-she-imat-pravo-na-razshiren-paket-zdravni-uslugi/>

⁹⁹ <https://www.strategy.bg/StrategicDocuments/View.aspx?lang=bq-BG&Id=1486>

¹⁰⁰ <https://www.strategy.bg/StrategicDocuments/View.aspx?lang=bq-BG&Id=1592;p.29>

historical, but also persistent, structural, and often institutional and administrative anti-Roma attitudes persist at all levels of European society, manifesting on a daily basis. This represents a major obstacle to the Roma achieving their full potential as full EU citizens. Although they officially enjoy the full extent of fundamental rights, this population is particularly vulnerable, which is most often observed in the lack of social inclusion and equality, inadequate housing measures, segregated education, healthcare, and sustainable employment.

The RCM observes that based on this research, which is being conducted at the beginning of the COVID-19 epidemic, the attitude towards the Roma population is deteriorating, and the consequences of the epidemic can still be observed. During the epidemic, the deteriorating situation and exclusion of a part of the Roma population from basic sectors such as employment and education could be observed, especially in smaller settlements. This is related to the impossibility for some students of working in a digital environment due to a lack of technology and access to the internet, as well as the discrimination that is observed in employment, depriving a large number of people from vulnerable groups. The phenomenon of discrimination is rooted in and exacerbates the problems in every social sector, including but not limited to education, housing, health care, and employment. With clear objectives and a renewed commitment to achieving real change in the next decade, the European Commission proposes minimum targets for 2030, building on the progress made under the previous framework:

- Reducing the proportion of Roma who are subject to discrimination by at least half.
- Doubling the proportion of Roma reporting cases of discrimination.

In this area, in addition to the idea of preventing discrimination, there is also the issue of promoting the concept of communicating and asserting rights in the event of such discrimination. However, part of the wider European framework to tackle the problem involves sharing ideas and relevant policies through the national strategy. However, it is necessary to conduct work in the field, and such work should be done according to the regional specificities of vulnerable groups.

Between the development and adoption of Bulgaria's National Strategy, and in the years that followed, the country has faced significant geopolitical and internal challenges, including the war in Ukraine, instability in the Middle East, domestic political crises, and economic decline at the European level. These overlapping crises, including the COVID-19 pandemic, have shifted institutional focus away from addressing Roma issues, despite their inclusion in national policies. The overlapping of these events with the transition to a new EU programming period has further delayed solutions. Institutions remain heavily dependent on EU funding, which has been inconsistent due to these crises, while national funding has also suffered delays due to political instability and budget uncertainty.

It is important for all interested parties to resume the dialogue between the institutions and the representatives of the Roma sector. This can happen through sustainability in the NCCEI. Additionally, the work on regions and settlements should be more in-depth and tailored to the specific regional needs of the vulnerable population. Although the national strategy should encompass the various regional strategies and even municipal strategies, this is often done formally, without clear commitments and innovations in the relevant processes. Most of the main proposals for the NRSF are described and included in it. One of the recommendations made at the regional level is the creation of regional or municipal councils on ethnic and integration issues, which, regardless of the exact name, will encompass the relevant parties and promote effective and high-quality work between institutions and vulnerable groups. A large part of the non-governmental sector believes that the fight against discrimination happens through meetings, workshops and conversations at all levels, where the problems are clearly stated and potential solutions are sought together. The engagement of local institutions and bodies, as the first stop and starting point for reducing discrimination and hate speech against the Roma, is of utmost importance. Efforts should be made to improve work and relationships with local representatives, such as mayors, municipal councillors, education and health authorities.

3.4.2. Synergy with other actions

The activities included in this regard do not contradict the other parts of NRSF and the other documents for combating discrimination that have been approved by Bulgaria. At the same time, the NRSF could be much stronger, including proposing a special annexe that addresses antigypsyism, segregation and discrimination.

During the reported period, no developments in the mainstream Bulgarian legislation against discrimination were observed. The Commission for Protection against Discrimination (CPD) remained relatively passive since its mandate had expired. The new composition of the CPD was elected by the Parliament on 8 May 2025.

3.4.3. Roma participation

Roma organisations are naturally sought-after partners in the creation and implementation of this strategy. The participation of the CSO sector is promoted by both national and local authorities, as well as by the sector itself. Often, working with NCCEI is an important opportunity for local leaders to voice their concerns and recommendations. One of the main problems for the adoption of this strategy by the minority communities themselves is to specifically describe and identify the problem of 'self-determination'. Some of these communities that are referred to as 'Roma' by various district and regional authorities actually self-identify as 'Turks', 'Romanians' and others. Thus, we have witnessed a withdrawal of non-governmental organisations and political leaders from this process of interaction, despite their having similar problems to the 'Roma'. This divergence between local authorities and the population itself is a reason for non-compliance and a reluctance to accept responsibility for not meeting the goals and tasks set in the regional strategies. This phenomenon, related to the self-determination of vulnerable groups, can create additional tensions and cases of discrimination within Roma bodies. Anti-Roma and anti-minority rhetoric, as a language of hate, is mainly used by political leaders and parties from the nationalist and conservative spectrum, and is becoming a more frequent phenomenon in relation to the political situation in the country.

Despite the listed difficulties, Roma or pro-Roma organisations participate in the overall process, and they are an invariable part of it, with the main feedback and recommendations coming from them.

4. USE OF EU FUNDING INSTRUMENTS

4.1. Conditions for EU fund implementation for Roma equality

The ESF+ is the EU fund that supports Roma inclusion to the highest degree in Bulgaria. It co-finances two operational programmes, namely the Human Resources Development and Education programmes. Both of them include a Specific Objective „Promoting the socio-economic integration of marginalised communities, such as Roma people“. The Education Programme proposes the strongest support for Roma inclusion, equality and participation, combining a targeting and mainstreaming approach. These factors are foreseen in all three programme approaches: the national one, Integrated Territorial Investment (ITI), and Community-Led Local Development (CLLD). The Human Resources Program also provides such comprehensive support, although using a relatively smaller budget. The ERDF co-finances measures for housing accommodation and the renewal of neighbourhoods that can support the implementation of NRSF, although its contribution is significantly less than the ESF+.

From an analysis of the ESF+ programmes, we can state that the Education Programme develops its support for Roma inclusion measures in a comprehensive and scaled way. Its Priority 1 is called “Inclusive Education and Educational Integration”. This includes six groups of activities for fulfilling three Specific Objectives. One of them is ESO4.10. “Promoting the socio-economic integration of marginalised communities such as Roma”, which contains two groups of activities/operations: “Creating conditions for access to education by overcoming demographic, social and cultural barriers” and “Comprehensive programmes at the municipal level for desegregation of schools, prevention of secondary segregation and against discrimination”. Roma-related targets and indicators are also included in other Priorities and operations, including adult literacy, access to higher education (HE) for vulnerable groups, disadvantaged groups, and non-teaching staff, among others. The design of the programme can be highlighted as the best way to involve and support the Roma community through EU funds.

The total financing for the Education Programme is 786.795 million EUR. Of this, 287.264 million EUR is dedicated to Priority 1. Considering that Roma/vulnerable groups-related measures are also included in the other Priorities, we can state that the Education Programme supports the policy that targets Roma educational integration to a sufficient degree.

The Program itself is in accordance with the Strategic Framework for the Development of Education, Training and Learning in the Republic of Bulgaria until 2030, which is a strategic document for the development of Bulgarian education.¹⁰¹ This is an example of coherence between mainstream educational documents and the ESF co-funded program.¹⁰²

The Human Resources Development Program also provides significant opportunities for ‘soft measures’ to implement the NRSF, particularly in the areas of Employment, Healthcare, Rule of Law, Antidiscrimination, and Empowerment of Romani Women. It includes Specific Goal 2, “Encouraging the socio-economic integration of marginalized communities, such as Roma”. This specifies three types of activities: activities to support improved access to employment, skills, and qualifications; activities in the field of social inclusion and access to health; and activities against discrimination and to overcome negative stereotypes and attitudes in communities. One area of intervention is planned within Specific Goal 2, 154: “ Measures to improve access of marginalised groups such as Roma to education, employment and to promote their social inclusion”. The Programme also contains indicators applicable to Roma and other minorities. The financial framework of Specific Goal 2 is 79, million EUR. This is a significantly smaller amount than the share for the Roma / vulnerable groups targeted operations in the Education Programme. Nevertheless, support for Roma and other vulnerable groups is included in many other parts of HRDP.

¹⁰¹ Strategic Framework for Development of Education, Training and Learning in Bulgaria. Available in Bulgarian at: https://www.mon.bg/nfs/2021/03/strategicheska-ramka_obrobuuchene_110321.pdf

¹⁰² Amalipe, *The Strategic Framework for the Development of Education (2021-2030) will include the educational integration of children and students from ethnic minorities*. Available at: <https://amalipe.bg/en/the-strategic-development-framework-2021-2030-will-include-the-educational-integration-of-children-and-students-from-ethnic-minorities/>

The Regional Development Program (RDP) offers opportunities for implementing some of the goals and activities outlined in the NRSF's Priority Living Conditions. The Program contains the specific objectives "Renewal of neighbourhoods/specific areas with disadvantaged socio-economic characteristics, respecting the principle of non-segregation" and the Measure "Housing accommodation" as well as a set of Activities. It may be applied in 50 urban municipalities, district centres and other big towns. The Program text mentions the NRSF several times. Specific indicators for this measure are included in the Program, although they are not differentiated by group and do not mention Roma specifically. The RDP addresses Roma and Roma inclusion in a very modest way compared to the ESF Programs.

The same refers to ERDF support for Roma according to the ITI approach. ITIs are predominantly supported by ERDF and primarily contain 'hard measures' associated with repairing roads, water supply, and sewerage, among other infrastructure projects. Only few ITIs contain measures aimed at social inclusion and only one municipality included in one of its ITI the social housing.

All the Programs were prepared by special Working Groups established by a Decree of the Council of Ministers 142/2019. These included representatives of the Managing Authority, the Ministry of Education, the Ministry of Labour and Social Policy, the Ministry of Regional Development, other institutions, social partners and five groups of CSOs. NRCP, CPD, CEICSEM, as well as CSOs that work for the educational integration of marginalised communities, were present in the Working Group. DG EMPL and DG REGIO were permanently consulted and submitted their feedback and recommendations on every draft.

The implementation of the three programs so far, especially regarding Roma-related policies, shows the low level of interest among municipalities in engaging in social inclusion and Roma integration measures aligned with the ITI approach. Although municipalities (and other possible beneficiaries) have the possibility to include in their ITI social inclusion, Roma integration and social housing measures, they did not do this during the first call or only to a limited extent. Nevertheless, this could happen during the next call. The Ministry of Regional Development / the Managing Authority of the Regional Development Program has announced only one call aligned with the ITI approach to date (July 2023). The second call is now planned and is expected to be announced during the first half of 2025.

For example, the Education Programme approved three types of Activities for ITI, namely: adult literacy, comprehensive programs at the municipal level for the desegregation of schools, prevention of secondary segregation and discrimination, and dual education. The Program earmarked 91.1 million EUR for these. After the first call and the evaluation of all ITI concepts that were submitted, it became clear that the majority of projects contained only 'hard measures' and less than half of them incorporated territorial investments in the field of education and social inclusion: 81 out of 165 concepts contained activities eligible for the Education Programme. Only 37 of them were approved by the Regional Councils for Development. The amount awarded to these is slightly greater than 14 million EUR or 16% of the dedicated amount. Among them, the beneficiaries' interest was in dual education¹⁰³ (20 ITI concepts for 6,445,090 EUR), municipal desegregation programmes (12 ITI concepts for 3.8 million EUR) and adult education (six ITI concepts for 1.9 million EUR).¹⁰⁴

Similar to this, the interest of municipalities and other possible beneficiaries in applying for Roma-related activities supported by HRDP within ITI was also very weak, at 32 ITIs.¹⁰⁵ The situation was the same with the 'Housing Accommodation' measure within the RDP. Only one or two ITIs included a measure related to social housing during the first ITI call. Although most of the municipalities included predominantly 'hard measures' (funded by ERDF), their interest in 'housing accommodation' and particularly in social housing was very weak.¹⁰⁶ This could be due to the modest campaign for popularising these opportunities, the unattractiveness of social housing, the lack of willingness on the part of municipalities to prioritise Roma housing problems, etc. In any case, this is an alarming signal indicating serious problems for EU cohesion funds that are intended to target housing desegregation.

¹⁰³ According to so-called 'dual education', students in professional gymnasiums study at school (for 2 or 3 days) and at a factory or company, where they engage in practical studies.

¹⁰⁴ Information presented by the Managing Authority of the Education Program during the Monitoring Committee meeting on November 27, 2024.

¹⁰⁵ Interview with Tzvetan Spasov, Head of the Managing Authority of HRDP.

¹⁰⁶ Interview with Assya Dobrudjalieva, member of the RDP Monitoring Committee.

Regarding the 'Roma specific objective', the implementation of the Education Programme started with the call for proposals "Supporting Intercultural Education" funded by ESO4.10: "Promoting the socio-economic integration of marginalized communities, such as Roma". Two other calls supported by this measure were announced in line with the ITI approach: Comprehensive Municipal Programs for Desegregation, and Adult Literacy. In the last session of the Monitoring Committee (28 November 2024), two national calls were announced with the same/similar goals and names.¹⁰⁷ They reflect important challenges related to Roma educational integration and align with the NRSF. The low level of interest of potential beneficiaries (municipalities, schools/kindergartens, and CSOs) in applying is a serious challenge. The Managing Authority has taken positive steps to reduce the administrative burden in preparing and reporting projects, accelerate payments, and overcome state aid/de minimis requirements, among other measures that reflect CSO suggestions. Nevertheless, additional actions should be taken to raise the interest of potential beneficiaries. Full removal of de minimis from social inclusion and education projects, larger pre-payments, a larger share for indirect costs/administrative costs, and a fund for providing cash flow to CSOs with approved projects, among others, could be strong steps for ensuring greater CSO participation. Creating a favourable public and political environment for the work of civil society and avoiding hate speech towards CSOs (including Roma CSOs) are also of key importance.

Simultaneously, the Education Programme has initiated two major mainstream operations, with the Ministry of Education as the primary beneficiary. Two other similar operations have been approved by the Monitoring Committee, but have still not been opened by the Ministry of Education. Roma children participate in both operations ('systemic projects') – 'Support for success' and 'Strong start' – although the support is limited mainly to short courses in the Bulgarian language/literature and Maths. These short courses lack intercultural elements and interactive approaches, instead following the same methods as the school's regular lessons. As a result, their effect is limited, although positive. Both projects support the employment of educational mediators, but only for four hours per day. The idea is that these projects only contribute to the employment of educational mediators funded by the Decree of Financing (the state budget): in rural areas and the schools and kindergartens with small numbers of students, the state budget provides funds for employing 0.5 mediators per school/ kindergarten and the systemic projects contribute to the full salary of the mediators.

The Human Resources Development Program has just started implementing the "Roma objective." During the session of the Monitoring Committee on 26 November 2024, a targeted call, "Support for vulnerable and Marginalised Communities," was approved. It will be a competitive call for proposals at the national level, targeting 86 municipalities where the number of people who self-identify as Roma exceeds 1,000. CSOs will be the main beneficiaries, and each project can be funded at most 750,000 EUR.

This Operation (in the way it is proposed by the Managing Authority and approved by the Monitoring Committee) involves certain weaknesses, and one can expect limited interest and impact because:

- It also applies the 'de minimis' rule for CSOs, and this is a very disturbing specification. This means that if a CSO applies and receives support, it may not be eligible for another European Funds project for three years. This limitation is applied to companies and other economic entities to prevent market interference. However, Bulgarian Managing Authorities also apply it to CSOs, including in areas with no market and no economic character. The limitation does not apply to municipalities, schools, and other public institutions. Experience from the previous planning period (both within HRDOP and Science and Education for Smart Development OP) shows that this limitation leads to the exclusion of many strong organisations and to weak interest in such calls.
- The main criteria for pre-defining municipalities ("municipalities in which the self-described Roma population is at least 1,000 people") prioritises district centres (where Roma may make up a small proportion but their number exceeds 1,000), and southern Bulgaria (more than two-thirds of the population of Bulgaria lives in the southern regions, and it is much more likely that municipalities will have more than 1,000 residents who self-identify as Roma). As a result, only 38 out of 86 municipalities are located in northern Bulgaria, despite the EU's commitment to prioritising investment

¹⁰⁷Amalipe, *The Education Program Committee approved eight new operations and discussed a host of issues, including the change to the Preschool and School Education Act*. Available at: <https://amalipe.bg/en/the-education-program-committee-approved-8-new-operations-and-discussed-a-host-of-issues-including-the-change-to-the-preschool-and-school-education-act/>

there. Important rural municipalities in Northern Bulgaria with a large Roma population have been overlooked due to their small size.

- This criterion emphasises self-definition, omitting that 'Roma' is an umbrella term that includes groups that do not self-identify as Roma. In Bulgaria, many Roma self-identify as Turks/Millet, Rudari, and other groups. They face the same social and economic problems as those who self-identify as Roma, as well as the same forms of anti-Roma discrimination. The operation fails to capture these large groups. The Education Programme (and the Ministry of Education) has found a reasonable way to avoid this problem using objective criteria that are not based solely on self-definition, such as the educational level of the parents, among others. A similar solution could be found for HRDP.

We can expect that without changes in the criteria for preselecting municipalities and without removing the state aid / de minimis condition for activities which are non-economic (the main set of activities in the operation are not economic and there is no market for them), the entire operation will only be implemented to a limited degree with limited impact. This is why representatives of Roma organisations insist on changes. They had a Working Meeting with the HRDP Managing Authority at the end of January 2025 and proposed that all municipalities with Roma/vulnerable groups should be possible final beneficiaries (if they are small, a project could be implemented with a group of municipalities) and that municipal authorities to be possible beneficiaries if they are in consortium with CSO. Another suggestion was the operation does not apply the de minimis rule.

Prior to this Operation, HRDP proposed financing for Roma / vulnerable groups Operations within ITI (Priority 2 "Social Inclusion and Equal Opportunities", "Integration of Marginalized Communities such as Roma"), but the interest in them was very weak, as explained above.

The other HRDP mainstream Operations include Roma, according to the Managing Authority. For example, the call "Support for the children" supported more than 10,000 final beneficiaries, more than 35% of whom were Roma.¹⁰⁸ A Roma CSO member of the Monitoring Committee agreed with these statements, outlining that this operation was well-designed, attracted significant interest on the part of municipalities, and reached many marginalised Roma families.¹⁰⁹

Roma are also the final beneficiaries of many other mainstream Operations. According to information provided by the HRDP Managing Authority, 18,000 long-term unemployed people were supported within Priority 1. Of these, 7,000 were minority representatives. Approximately 42,000 citizens in vulnerable situations were supported in line with Priority 2, and the number of minority representatives was 10,000.¹¹⁰ Nevertheless, it is difficult to judge whether the share of Roma participating in these operations is proportionate to that of Roma in vulnerable situations because of the absence of such information. Our assumption is that they reach a relatively small number of Roma in long-term unemployment and other vulnerable situations. In addition, the Roma who are reached are relatively more motivated, thus do not represent the most vulnerable families and marginalised communities. This statement is supported by the lack of active participation of labour mediators (who are employed in labour offices but in small numbers, and do not participate in outreach activities), as well as interviews with grassroots-level Roma.

Case study: Financing Educational Mediators: from ESF to State Budget

The Educational Mediators serve as a specific 'bridge' between schools, kindergartens, and parents or local communities. As early as 2018, only a few educational mediators were working in Bulgaria. In 2018, the Ministry of Education encouraged educational institutions to employ educational mediators using specific funds allocated for work with vulnerable groups, which were provided by the state budget through the Financing Decree. The number of mediators increased, but was still very low. This is why the Ministry of Education included the possibility of appointing educational mediators in "systemic projects" (or projects implemented by MoES as a concrete beneficiary with funds from Science and Education for Smart Growth) such as "Support for Success" and "Active inclusion in the field of pre-school education". As a result, the number of educational mediators increased by around 1,000.

¹⁰⁸ Interview with Tzvetan Spassov, Head of the HRDP Managing Authority.

¹⁰⁹ Interview with Spaska Petrova, New Road Association, Member of HRDP Monitoring Committee.

¹¹⁰ Presentation "Human Resources Development Program, physical progress", presented during the Monitoring Committee session on November 26, 2024.

Since both systemic projects were completed in 2022, many schools and Amalipe advocated before the MoE for the provision of state budget funds for the salaries of the educational mediators. Initially, MoE introduced the National Program ‘Supporting Educational Mediators and Social Workers’ from July 2022 to June 2023. During this period, it became clear that the new Education Programme would support educational mediators only partly (with half a day’s employment) due to the need for state budget engagement to sustain this successful practice. Initially, the caretaker government decided not to provide special funds for the educational mediator and instead relied on school budgets for this purpose. Amalipe, the informal National Network of Educational Mediators, and many schools undertook an advocacy campaign and a national petition. They met with support from the teachers’ trade unions, school principals’ unions, the Ombudsperson, ambassadors and more than 21,000 citizens. Immediately after the election of the new Bulgarian Government, the problem was solved in a sustainable way. Changes to the Financing Decree were introduced, providing special funds for appointing educational mediators.¹¹¹

As a result of the changes in the Financing Decree, the state budget allocates EUR 5 million annually, which can only be used for the salaries of educational mediators, teaching assistants, and social workers. Schools and kindergartens with a concentration of vulnerable students receive these funds, which finance the salaries of 1,260 mediators. This financing is provided every year.

Later, the educational mediators were included in the staff description of the schools and kindergartens, and they have the same rights as all other staff members (December 2023). Possibilities for the professional training of the educational mediators were approved in August 2024.¹¹²

The educational mediators are an example of how support for a promising, successful practice can be transferred from ESF+ to the state budget.

4.2. Roma civil society in EU fund implementation

Roma and pro-Roma civil society participated actively in the preparation of the main EU co-funded programmes. The possibility for this was envisaged in the Decree of the Council of Ministers 142/2019,¹¹³ which defined the preparation of the Partnership Agreement and the (operational) programmes for the period 2021–2027. Article 7, para 4, point 14 allows five types of CSOs to elect their representatives to the Working Groups for preparing the programmes. One type of the latter was “organisations working in the field of social inclusion and integration of marginalised groups”, and most of the Roma and pro-Roma CSOs applied in this category. According to the Decree, CSOs had to apply by proving their experience, and the approved organisations from every type of CSO had to elect, by consensus (i.e., unanimously), one participant and up to three deputy participants to the Working Group. The interest of Roma and pro-Roma CSOs was very strong, and they elected their representatives in the Working Groups for preparing Science and Education OP (Deyan Kolev, Center Amalipe), Human Resources Development OP (Spaska Petrova, New Road Association), Regions in Growth OP (Gancho Iliev, World Without Borders Association), and the Partnership Agreement.

From the very beginning of the programmes’ preparation, Roma CSOs faced political resistance in incorporating the Specific Objective “Socio-economic integration of marginalised communities, such as the Roma” into the ESF programmes. This was part of the disturbing trend of avoiding Roma-targeted activities. To work around this, Roma organisations combined their suggestions in the Working Groups, submitted official letters to the main Managing Authorities, the European Commission, and the main embassies, as well as engaged in other advocacy activities. They received support from DG EMPL and the key embassies. As a result, the ESF (operational) programmes included the “Roma Specific Objective” as well as the main suggestions for Operations suggested by Roma representatives in the Working Groups.¹¹⁴ The Education Programme

¹¹¹ Amalipe, *The Council of Ministers approved the changes in the Financing Ordinance, which guarantee the long-awaited funding for educational mediators*. Available at: <https://amalipe.bg/en/educational-mediators-success/>

¹¹² Amalipe, *A new profession, “Educational Mediation,” has been approved for inclusion in the List of Professions for Vocational Education and Training*. Available at: <https://amalipe.bg/en/a-new-profession-educational-mediation-has-been-approved-for-inclusion-in-the-list-of-professions/>

¹¹³ Available at <https://www.eufunds.bg/sites/default/files/uploads/eip/docs/2020-11/%D0%9F%D0%9C%D0%A1%D0%9E2%84%96%20142%D0%BD%D0%B0%D0%9C%D0%A1%D0%BE%D1%82%202019%D0%B3.pdf>

¹¹⁴ The approved versions of the Education Programme and Human Resources Development Programme are available at: <https://www.eufunds.bg/bg/opseig/node/7361>. For analyses of the main achievements and challenges

incorporated the majority of suggestions from Roma CSOs, including types of activities (Operations), a combination of targeting and mainstreaming approaches, a combination of national and territorial approaches, indicators, and possibilities for CSOs to apply, among others. The Human Resources Development Program also included many suggestions proposed by Roma CSO representatives, although it limited the “Roma Specific Objective” only to the territorial approaches.

Important suggestions of Roma/pro-Roma CSOs were also included in the new Regions in the Growth Program: namely, in the Specific Objectives “Renewal of neighbourhoods/specific areas with disadvantaged socio-economic characteristics, respecting the principle of non-segregation” and “housing accommodation”, as well as a set of Activities.¹¹⁵

Roma and pro-Roma CSOs also participate actively in the Monitoring Committees of the main EU co-funded programmes. The possibility for this is envisaged in the Decree of the Council of Ministers 302/29.09.2022 on the establishment of Monitoring Committees for the Partnership Agreement of the Republic of Bulgaria and the programmes co-financed by the ESAF for the programming period 2021-2027.¹¹⁶ Article 13, para 3, point 11 defines four types of CSOs eligible to elect their representatives to the Monitoring Committees. Organisations working in the field of social inclusion and integration of marginalised groups are one of the four types of CSOs. They also include representatives of the Local Initiative Groups established in line with the CLLD approach. The election procedure was organised by the Managing Authorities in October and November 2022. Roma and pro-Roma CSOs took an active part in it and elected their representatives to the Committees of Human Resources Development (Spaska Petrova, New Road Association), Education Programme (Deyan Kolev, Centre Amalipe), Assya Dobrudzhaleva (Habitat for Humanity), and Rural Areas Development Program (Kamen Makaveev).

The representatives of Roma and pro-Roma CSOs are among the most active participants in the Monitoring Committees. They advocate for certain issues, such as:

- Announcing Roma-targeted operations: this claim was a continuation from the one for incorporating the “socio-economic integration of marginalised communities, such as the Roma” during the preparation of the new programmes. Specific calls for supporting intercultural education, desegregation, lifelong learning and adult literacy courses, as well as support for vulnerable and marginalised communities, have been announced so far. Operations to support the university studies of vulnerable students and other initiatives that include a large proportion of Roma are planned for the next few months.
- Announcing calls open for CSOs: during the previous programming periods, a dangerous tendency dominated the EU fund implementation in Bulgaria, namely, announcing predominantly “operations with concrete beneficiaries” which are state institutions or social partners (trade unions and employers’ unions). This is why CSOs advocate for calls for proposals that are also open to CSOs and other types of beneficiaries (schools, kindergartens, etc.). A better balance and equilibrium between calls directed at state institutions and at CSOs and other beneficiaries prevail in the present period. Most of the Roma/vulnerable-groups-targeted Operations that have been announced or are planned include the possibility for CSOs to apply as beneficiaries. Nevertheless, the usage of ‘state aid/de minimis’ criteria strongly limits these possibilities.
- Including Roma and other vulnerable groups in the mainstream Operations: since a large number of Operations will continue to be implemented by the respective state institutions (especially in the field of education), it is important that the biggest Operations (called “systemic projects”) also benefit Roma children and parents. Although certain Roma-related indicators were included in the new programmes

associated with the new Education Program, see <https://amalipe.bg/en/what-would-the-new-education-programme-fund-in-pre-school-and-school-education/> and <https://amalipe.bg/en/challenges-for-the-new-education-programme/>

¹¹⁵ Interview with Assya Dobrudzhaleva, participant of the Working Group for Preparing and in the Monitoring Committee of Regions in the Growth Program 2021-2027.

¹¹⁶ Available at: https://www.eufunds.bg/sites/default/files/uploads/eip/docs/2024-10/POSTANOVLENIE_302_na_MS_ot_29092022_q_za_sazdavane_na_komiteti_za_nabludenie_na_Sporazumenieto_pd_f

and in the announcement of these mainstream programmes, their support for Roma inclusion is still limited.

- Overcoming state aid/de minimis regulations for the projects directed at vulnerable groups and implemented by CSOs: Managing Authorities in Bulgaria apply state aid to all projects implemented by CSOs. This is a serious problem that hinders the participation of CSOs in Bulgaria. It began during the previous planning period, when one or two projects exceeded the de minimis margin of 200,000 EUR (the limit before 2024). As a result, many calls within HRDOP and SESDOP failed because there were either no applicants or a small number of applicants (most of the CSOs had fulfilled their de minimis requirements). This is why Roma and other CSOs have advocated for eliminating the de minimis rule for CSOs. They have used a variety of means to raise this claim before the OECD¹¹⁷, European Commissioners,¹¹⁸ national Managing Authorities, the Central Coordination Union and others. As a result, the Operations associated with the Education Programme (starting from 'Supporting Intercultural Education...') will apply state aid rules at a very small scale: they will only apply to the staff of the organisational applicants. This is not a perfect solution, and the efforts will continue.

Besides the examples of meaningful participation and advocacy successes, Monitoring Committees and other formalised structures for managing EU funds are associated with many examples of formal and unsuccessful participation. In general, representatives of state institutions comprise the majority of participants in all the Monitoring Committees, as provided in Decree 302/2022, while CSO representatives are limited to four. There are many cases of not respecting the claims of CSOs. The possibility for civil society representatives to participate in real decision making depends on many factors, such as readiness of the respective Managing Authority to include Roma issues, support from EC representatives, cooperation with social partners, their activeness during the entire period (not only during the meetings of the Monitoring Committee), cooperation with the Managing Authority, etc. Interviews with CSO representatives in different committees reveal varying levels of readiness among the Managing Authorities to address the suggestions of CSOs, ranging from a high level of cooperation and willingness (Education Programme) to limited ones (Regions in Growth). In some cases, Roma CSO participants receive strong support, while in others, they have even observed the rejection of their main suggestions.

Case study: The suggestions of Roma CSOs regarding the new Education Programme

After the procedure for electing CSO participants in the Working Group for preparing the new Science and Education OP, the group of 'organisations working in the field of social inclusion and integration of marginalised groups' elected Deyan Kolev (Center Amalipe) as its representative and Milena Kadieva (Gender Alternatives), Gancho Iliev (World without Borders) and Spaska Petrova (New Road) as deputy representatives. In this way, the Roma CSO representative actively participated in every session of the Working Group.

The Managing Authority did not intend to include the Specific Objective "Socio-economic integration of marginalised communities such as Roma" in the first draft of the new programme. This seemed to be a 'hidden political decision' by the government, as the same situation prevailed with the new Human Resources Development OP.

Roma CSO representatives reacted immediately, proposing that the Roma-targeted Specific Objective be included in both Operational Programmes. They informed both the Bulgarian institutions and the European Commission, as well as the Group of Ambassadors on Roma Issues,¹¹⁹ about their position.¹²⁰ In addition, they had some advocacy meetings with the Managing Authorities, the respective ministers or deputy ministers and

¹¹⁷ Amalipe, *The problem of the application of the State aid regime in the focus of the European institutions*, Available at: <https://amalipe.bg/de-minimis/>

¹¹⁸ *Meeting of European Commissioners Dali and Yourova with non-governmental organizations from Bulgaria*. Available at: <https://amalipe.bg/en/meeting-of-european-commissioners-dali-and-yourova/>

¹¹⁹ GARI (Group of Ambassadors on Roma Issues) is a group of 14 ambassadors from the EU, Switzerland, the UK and the USA in Bulgaria.

¹²⁰ Kolev, Deyan. *Operational programs between real needs and indecisiveness: look at the new programming period*. Available at: http://www.amalipe.com/files/publications/Operational%20programs_en.pdf

DG EMPL. In the end, Kolev refused to support the first draft of the Science and Education OP because of the lack of a Roma-targeted Specific Objective.

DG EMPL recommended that this Specific Objective be included in the new OP. It also emphasised the importance of incorporating Roma-related indicators and goals into all Specific Objectives and activities. As a result, the second draft of SEOP contained all these elements.

Roma CSOs raised several other suggestions for the new operational programme, including the incorporation of types of activities and Operations to support intercultural education, desegregation, and others. The majority of them were included in the new Education Programme (the final name of the new programme). As a result, the Education Programme supports Roma inclusion, equality, and participation in both targeted and mainstream ways, with significant funding and Operations that are accessible to CSOs.

5. ADDITIONAL FINDINGS

The previous RCM report made 13 recommendations to the national authorities. Approving the NRSF through a Decision of the Parliament, reform of the National Council for Cooperation on Ethnic and Integration Issues, reform of the NRCP, preparing 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”), supporting the institutional development and the capacity of civil society organisations to cooperate in the implementation of the NRSF and the local Action Plans were among them.¹²¹ Only a few of these recommendations were fulfilled, primarily in the area of utilising EU funds.

Analysing the NRSF implementation, we should keep in mind:

1. Since 2021, Bulgaria has been experiencing permanent political crisis and instability, with seven general elections and 10 governments having changed (the last one, as this report was being drafted, was elected on January 16, 2025). Most institutions do not function effectively and efficiently within this environment.
2. The war in Ukraine has further decreased the political attention to Roma inclusion, equality and participation. Although the number of Ukrainian refugees in Bulgaria is relatively small, the attention to Roma-targeted policy has always been low, and it has decreased further.
3. The level of antigypsyism and social distancing towards Roma is very strong. This has a negative impact on the entire Roma integration policy. The Bulgarian NRSF does not address this problem, as explained above.
4. The increase in hate speech towards civil society and anti-CSO rhetoric is a dangerous trend in recent months. In August 2024, the Bulgarian Parliament adopted changes to the Public Education Act that ban “LGBT propaganda” in schools and create a public environment that hinders the work of CSOs in schools. A draft law for the “Registration of foreign agents” has been proposed by the ultra-nationalist and anti-EU party *Vazrazhdane*, as well as other restrictive draft legislation. The pro-EU parties have a majority in the Parliament and rejected this draft legislation on February 5, but there are serious signs that a negative change is possible.¹²²

Having regard to the fact that CSOs are one of the main driving forces behind Roma policy, this anti-CSO environment has negative consequences for the NRSF.

¹²¹ RCM, Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Bulgaria, p. 40.

¹²² Kolev, D. *The New Measures Against Crisis and Corruption: Fight Against Civil Society*. Available at <https://amaliqe.bg/en/cso-2025/>.

CONCLUSIONS AND RECOMMENDATIONS

The implementation of NRSF has made limited practical progress. Changes in the NRCP were introduced, but they did not strengthen its limited mandate, responsibilities and human capacity. The regulatory power of the new Strategy remains significantly lower than necessary, and in fact, even lower than that of the previous one. The current NRSF was approved by a ministerial decision and cannot involve a wider range of institutions. The added value of the new Action Plan is also low; it primarily includes activities that are already implemented and does not prescribe any new ones. Roma participation in the overall implementation, monitoring and evaluation is very limited. A worrying trend is the increase in hate speech against civil society and restrictive legislation in this respect.

A positive development during the period under review is the establishment of the profession of educational mediator, its funding by the state budget, as well as the serious involvement of European funds (especially ESF+ funded programmes). This is largely due to the advocacy of Roma organisations and the support of the European Commission.

Serious challenges remain in terms of discrimination and hate speech against Roma, segregation in education, housing and the large proportion of uninsured Roma.

Recommendations to national authorities

1. Propose and approve the NRSF through a Decision of the Parliament. The approved version should encompass a broader set of activities (including those for institutions independent of the Council of Ministers) and include a requirement for annual discussion in Parliament regarding NRSF implementation.
2. Prepare and approve, in close cooperation with the Roma and pro-Roma civil society, the following 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".
3. Reform the National Council for Cooperation on Ethnic and Integration Issues with consideration of the suggestions from Roma and pro-Roma civil society, and ensuring the real participation of high-level political officeholders (ministers).
4. Also, reform the National Roma Contact Point by establishing a special unit called 'Roma equality, inclusion and participation'. Increase the capacity of the NRCP and appoint Roma (including Roma women) to serve in it.
5. Reform and empower the National Roma Platform to ensure the participation of a broader set of Roma and pro-Roma CSOs, and stronger cooperation with other stakeholders. Make use of the entire set of Council Recommendations regarding cooperation among the NRCP, NRP, Roma civil society and equality bodies (including the Ombudsman) to monitor and report on discrimination.
6. Engage with targeted population mapping of vulnerable Roma communities and follow up on the findings to inform and support further policy-making and implementation of the NRSF.
7. 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 use it systematically to support inclusion policies and the implementation of the NRSF.
8. Add to the Action Plan a special section regarding support for 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, provide support for the establishment of umbrella Roma and pro-Roma organisations, including financial support and further capacity building and empowerment.
9. Delegate to CSOs the implementation of certain activities and the funds necessary for this: the delegated activities should be financed both from ESF+ programmes and the state budget.
10. Remove all obstacles to and create favourable conditions for the effective participation of civil society organisations in the implementation of projects under EU programmes. This should include overcoming

the unjustified application of state aid/de minimis rules, the provision of appropriate pre-payment, the possibility for CSOs to implement large projects, etc.

11. Ensure the stronger engagement of ERDF with improving the housing and living conditions of Roma: e.g. targeted operations for improving housing/living conditions of vulnerable groups in pre-defined settlements and neighbourhoods, introducing conditionality for every municipality that uses ERDF so they also invest in disadvantaged areas, etc.
12. Ensure the stronger involvement of ITI and CLLD in supporting NRSF implementation.
13. Create conditions for the establishment and recognition of a Roma umbrella coalition. This should be included in the consultative process on Roma integration policies and in the overall development of anti-discrimination and education measures, as well as other key areas. The funding needed for its sustainability and capacity development should be provided by the state budget or EU funds.
14. Create a favourable legal and public environment for civil society to work: help prevent any hate speech towards CSOs, prevent restrictive legislation (e.g. the 'law against foreign agents', mixing lobbying and advocacy in a law on lobbying, etc.). Promote partnerships between institutions and CSOs on Roma issues.

Recommendations to European institutions

15. Closely monitor the implementation of the Bulgarian NRSF, encouraging stronger political attention, the greater involvement of civil society, and the usage of EU funds for Roma-related policies.
16. Closely monitor negative developments in legislation and the public environment regarding civic participation and CSO activities, reacting promptly to such negative developments and supporting the initiatives of Bulgarian CSOs.
17. 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. Expand the funding of the national CSOs through RCM initiatives after 2025.
18. Encourage the usage of EU funds through the national programmes (especially in Education, Human Resources Development, Regions in Growth and the Rural Areas Development Programme), including through calls for proposals open to CSOs.

Recommendations to civil society

19. Respond promptly to all threats of restrictive legislation or action by institutions and political parties and the overall deterioration of the public environment by defending the European and democratic orientation of Bulgaria and Bulgarian society.
20. Build broad coalitions and networks, including Roma organisations, which aim to protect the public image of CSOs and oppose anti-democratic tendencies in political life, institutional activity and public opinion.
21. Further strengthen the latter's links with the constituencies (the groups NGOs are working for), increasing the constituencies' support.
22. Strengthen cooperation and advocacy at national and local levels, including through establishing a Roma/pro-Roma umbrella organisation/coalition.
23. Promote the capacity-building of CSO staff regarding strategic planning, monitoring, and evaluation, as well as regarding individual rights and how to respect them.
24. Advocate for and participate in reforming, building up, and strengthening the National Roma Platform.

Recommendations to other stakeholders

25. Implement Municipal Roma inclusion plans and Municipal Projects (including through ITI and CLLD) in close cooperation with the local Roma communities.
26. Increase the budget and human resources of the municipal and regional councils on ethnic and integration issues, so these structures can work more efficiently.

- 27. Use ITI and CLLD for activities that target and include Roma and Roma neighbourhoods.
- 28. Outsource funds for Roma-related projects.
- 29. Target and actively involve local organisations and field workers in the implementation of the municipal Roma integration plans, delegating activities and budgets.

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List of interviews

A total of 30 experts were interviewed, among which:

- 3 from the NRCP,
- 3 from the anti-discrimination bodies,
- 3 from the Managing Authorities of European funds programme,
- 8 from municipal institutions in 5 municipalities (3 urban and two rural, 3 in north Bulgaria and 2 in south Bulgaria),
- 1 from the Bulgarian Academy of Science,
- and 9 from Roma and pro-Roma CSOs.

Focus groups:

Two focus groups were implemented with the participation of local and national-level CSOs.

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ANNEXE: LIST OF PROBLEMS AND CONDITIONS

Fighting antigypsyism and discrimination

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Fighting antigypsyism and discrimination	critical problem	understood with limitations	adequate but with room for improvement	adequate but with room for improvement	<p>Adopted measures</p> <p>Strengthening Anti-Discrimination Bodies</p> <p>Enhancing Legal Frameworks:</p> <p>Facilitation of workshops and public consultations</p> <p>Effectiveness of measures</p> <p>Adequate but with room for improvement due to the political situation and COVID-19.</p> <p>Outreach of measures</p> <p>Main stakeholders and representatives are contacted. Need to narrow down the outreach to the experts working on the spot.</p> <p>Data collection</p> <p>Limited due to the difficult political situation and frequent changes of institutions and responsible persons</p>

Education

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Educational Segregation	Critical problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant	<p>Adopted measures</p> <p>The NRSF and its Action Plan primarily include activities that are implemented by various institutions prior to their implementation. No new activities are included. Certain new activities implemented between 2022 and 2024 are not included in the Action Plan.</p> <p>Education Programme supports important activities for Roma educational integration, such as teacher training, introducing intercultural education,</p>
High Dropout Rates	Critical problem	identified and analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement	

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Teacher Bias and Lack of Capacity	Critical problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant	desegregation, etc. NRSF is a precondition for ESF programs.
Economic Disparities and Social Isolation	Critical problem	understood with limitations	absent	absent	Effectiveness of measures Limited; no significant legislative changes or systemic approaches have been adopted. Introducing sustainable financing from the state budget for the educational mediators is one of the exceptions. Significant amounts from the state budget were provided.
Inadequate Monitoring and Data Collection	Critical problem	mentioned but not analysed sufficiently	present but insufficient	absent	The effectiveness of the Education Programme measures varies and depends on the capacity of the beneficiaries.
Underrepresentation of Roma Culture and Language	Significant problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant	Outreach of measures Focused primarily on local-level initiatives without widespread national implementation. Educational mediators are the only exception that reached the national level. The teacher training supported within the Education Programme also reached a large number of teachers and schools.
Limited Scope of NRSF Interventions	Significant problem	mentioned but not analysed sufficiently	present but insufficient	adequate but with room for improvement	Data collection Lacks ethnically disaggregated data, making it difficult to assess actual progress.
External Factors Aggravating the Situation	Significant problem	understood with limitations	absent	absent	
Insufficient Roma Representation	Significant problem	identified and analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement	

Employment

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Local and transborder exploitation	significant problem	mentioned but not analysed sufficiently	absent	absent	none
Labour integration of the cyclic transborder migrants at the local level (i.e. in the country of origin)	critical problem	mentioned but not analysed sufficiently	absent	absent	none
Youth not in employment, education or training (NEET)	significant problem	identified and analysed sufficiently	appropriate	adequate but with room for improvement	<p>Adopted measures</p> <p>Promotion of employment through motivation, vocational guidance and training of unemployed persons</p> <p>Effectiveness of measures</p> <p>Clear and reasonable benchmark indicators</p> <p>Outreach of measures</p> <p>National outreach</p> <p>Data collection</p> <p>Self-identification, ethnicity-based, voluntary data gathering</p>
Discrimination on the labour market by employers	Significant problem	mentioned but not analysed sufficiently	inadequate	absent	<p>The measure does not sound reliable:</p> <p>'Conducting research on discrimination against the Roma population in the areas of employment' says nothing about benchmarks, sampling, coverage, indicators, etc.</p>
Risk for Roma women and girls from disadvantaged areas of being subjected to human trafficking and forced commercial	critical problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant	<p>Adopted measures</p> <p>All measures are focused only on the training of police officers, which should be just the first step (i.e. formal identification). There are no measures targeting community prevention, informal identification or pre-identification of people at risk; no measures related to proactive investigation and prosecution, no measures related to financial</p>

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sex services					compensation of the victims; no measures focused on protection from THB within the family and kinship network
Cyclic enrolment in and out of subsidiary employment	Significant problem	not identified			Subsidised employment mixed with promoting entrepreneurship. The measures regarding subsidised employment are characterised by mixed sources of funding, a defined aim of 6,000 for the period 2021-2027, without clear justification or a needs assessment, and without clear milestones for the sub-periods. As a matter of fact, as defined, any beneficiary could be reported: youth, women, aged 55+, both Roma and non-Roma

Healthcare

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Easy exclusion from public health insurance coverage (including those who are stateless, third-country nationals, or EU mobile)	critical problem	mentioned but not analysed sufficiently	present but insufficient	absent	There are targeted measures to support pregnant women and early maternity care for those without healthcare insurance. However, there are no prevention measures that target early dropping out of the healthcare system or for proactive inclusion
Limited access to healthcare services due to a lack of such services in the settlement or municipality for some rural and remote regions	critical problem	Absent in NRIS	Some measures in the action plan	OG consultations Mammograph Child vaccinations and paediatric check-up	There are 2,000 OG check-ups with mobile OG offices planned for the entire period of 2022-2023, as well as the same number of mammography check-ups. Considering that there are 265 municipalities in Bulgaria and over 100,000 Romani women (according to the 2021 census), the effectiveness of these measures is relatively low. Mobile child vaccinations are planned, but there is no established needs assessment procedure or preliminary benchmark. Moreover, the identification is delegated to the Red Cross and NHIF. Therefore, children left without paediatric registration, due to the lack of address registration of the parents, are at risk of remaining unvaccinated. There are no other mobile medical services planned for the period.
Limited access to emergency care	Critical problem in some municipalities; significant problem for the country	absent	absent	absent	
Limited access to primary care	Critical problem	absent	absent	absent	
Limited access to prenatal and	Significant problem	identified and analysed	appropriate	relevant targets well defined	Amendment of Ordinance 26 in August 2022 and June 2024. Thus, the scope of medical services related to obstetric care for uninsured women includes the provision of hospital medical care under clinical pathway No.

postnatal care		sufficiently			005 "Childbirth" and clinical pathway No. 001 "Inpatient care for high-risk pregnancies", which were significantly extended
Poor access to sexual/reproductive healthcare and family planning services	Significant problems	absent	absent	absent	
Specific barriers to better healthcare for vulnerable groups such as elderly Roma people, Roma with disabilities, LGBTI and others	Significant problems	understood with limitations	adequate but with room for improvement	adequate but with room for improvement	Provide low -lawn services with 21 mobile units and identified several communities extremely vulnerable to stigma: HIV/AIDS, addicted persons, and children. Lack of sensitivity towards Roma Elders or Roma LGBTIQ+
Discrimination/ antigypsyism in healthcare (e.g., segregated services, forced sterilisation)	Significant problems	absent	absent	absent	
Misuse of mediators in some municipalities by roles other than healthcare	Minor problem	understood with limitations	adequate but with room for improvement	adequate but with room for improvement	Piloting a new approach towards health mediation in seven municipalities: health mediators are employed directly as hospital staff and thus are independent from the political changes at the municipal level
A significant turnover of healthcare mediators	Minor problem	mentioned but not analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement	There are several targeted measures for increasing the role and prestige of the health mediators: training, certification, national register, improved job description

Housing, essential services, and environmental justice

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Roma are exposed to forced evictions out of the informal settlements	critical problem	Not mentioned	absent	absent	failure of Bulgarian authorities to recognise discrimination
Lack of assessment of the proportionality of measures in the course of forced evictions	Significant problem	Not mentioned	absent	absent	Despite not being present in the NRIS or Action Plan, due to the <i>Yordanova and Others v. Bulgaria</i> case, the Ministry of Justice established a working group and employed outside legal and social research consultancy services to assess the issue and needs. However, no amendments to the legislation have been made so far
Illegal residence and informal settlements due to a lack of personal documents	Significant problem	Not mentioned	absent	absent	Despite not being present in the NRIS or Action Plan, due to a new solution with personal documents, a possible effect on this issue is expected in the future
Lack of social housing	critical problem	understood with limitations	present but insufficient	some targets but not relevant	The number of municipal dwellings in the country is 32,225, accounting for 0.8% of the National Housing Fund. Additionally, 82,240 people, or 1.2% of the population, are housed. Only 899 are social housing, located on the territory of 25 municipalities and realised under OPRD 2007-2013 or 2014-2020 by 2023. The targets and benchmarks set by the Ministry of Regional Development are insufficient and unjustified by the needs assessment
Poor physical security of housing (ruined or slum housing)	significant problem	mentioned but not analysed sufficiently	absent	absent	There is a lack of political will in the MRDRB directorate responsible for Roma integration, which results in indirect institutional discrimination. There are no applicable and feasible measures tailored to the needs. The lack of measures is usually excused by the illegality of the dwellings
Lack of access to drinking water	significant problem	mentioned but not analysed sufficiently	absent	absent	

Lack of access to sanitation	significant problem	mentioned but not analysed sufficiently	absent	absent	
Lack of access to electricity	significant problem	mentioned but not analysed sufficiently	absent	absent	
Limited or absent public waste collection	significant problem	Not mentioned	absent	absent	
Restricted heating capability (families unable to heat all rooms/all times when necessary) or solid waste used for heating	significant problem	Not mentioned	absent	absent	
Overcrowding (available space/room for families)	significant problem	Not mentioned	absent	absent	
Housing in segregated settlements/ neighbourhoods	significant problem	Not mentioned	absent	absent	
Exposure to hazardous factors	significant problem	Not mentioned	absent	absent	

(living in areas prone to natural disasters or environmentally hazardous areas)	significant problem	Not mentioned	absent	absent	
Limited or lacking access to public transport	significant problem	Not mentioned	absent	absent	
Limited or lacking access to green spaces	significant problem	Not mentioned	absent	absent	

Social protection

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
High at-risk-of poverty rate and material and social deprivation	critical problem	absent	absent	absent	
Income support programmes fail to guarantee an acceptable level of minimum income for every household	significant problem	absent	absent	absent	
Limited access to income support schemes (low awareness, barrier of	significant problem	absent	absent	absent	

administrative burdens, stigma attached)					
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 problem	absent	absent	absent	
Low flexibility of income support programmes for addressing changing conditions of the household	significant problem	absent	absent	absent	

Social services

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
National map of social services is not tailored to the Roma community's (no mobile preventive community work and in-situ community work in the bylaw)	critical problem	absent	absent	absent	
Households living in informal dwellings are	critical problem	mentioned but not analysed	absent	absent	Despite being outside the scope of NRIS, an amendment was made to the law on civil registration and the concept of 'a service address' was

'invisible' for the social services, due to a lack of residence registration		sufficiently			introduced. If it is impossible for persons living in informal dwellings to register at another address, they may register at an official address provided by the municipality.
Lack of easy access to social services in rural areas and remote regions	significant problem	mentioned but not analysed sufficiently	absent	absent	
The bylaws of SSA are not coherent with other national legislation and are considered 'vulnerable' only single elders and people with disabilities	minor problem	absent	absent	absent	

Child protection

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Romani children are more likely to be removed from their families and placed in alternative care	significant problem	absent	absent	absent	
Romani children are less adopted and less accepted by foster families, and as a result, many of them are	significant problem	absent	absent	absent	

instead placed in state institutions					
Child marriages	critical problem	mentioned but not analysed sufficiently	absent	absent	
Lack of sexual healthcare and family planning lessons at school	minor problem	absent	absent	absent	Through an amendment to the Law on preschool and school education, in August 2024, the possibilities for teachers to speak about issues as gender and sex were definitively limited.
Lack of justice for children in the context of racial profiling	critical problem	absent	absent	absent	
Illegal child labour practices	minor problem	absent	absent	absent	
Roma children victims of human trafficking by family members as perpetrators	significant problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant	

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

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Poor or lacking awareness of the general population of the contribution of Roma art and culture	significant problem	absent	absent	absent	

to national and European heritage					
Exclusion of Roma communities from national cultural narratives	significant problem	absent	absent	absent	
Romani history and culture are not included in school curricula and textbooks for both Roma and non-Roma students	significant problem	absent	absent	absent	
Lack of inclusion of the Romani language in schools, and development of necessary educational materials and resources for Romani language preservation and teaching	critical problem	absent	absent	absent	
Lack of memorialisation of Roma history through establishing monuments, commemorative activities, and institutionalising dates relevant to Roma history	significant problem	absent	absent	absent	

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