



**AMALIPE CENTER FOR INTERETHNIC DIALOGUE AND  
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**The implementation of the National Roma Integration Strategy in Bulgaria in 2011 –  
2013:**

***# The requested action takes too long time***

On April 5, 2011 the European Commission announced its communication “EU Framework for National Roma Integration Strategies”. After long and controversial consultation process that took place during the second half of 2011, Bulgarian Council of Ministers adopted National Strategy of Republic of Bulgaria for Roma Integration (NRIS) and Action Plan (AP) on December 21, 2011. Following the request of Roma NGOs, the Strategy was proposed to the Parliament and approved with Decision of the Parliament from March 1, 2012.<sup>1</sup> In this way the NRIS became the first Roma integration document in Bulgaria approved by the National Assembly that is an important positive development (all previous documents were approved with decisions of the Council of Ministers or Decree of the Council of Ministers). Thus the Strategy could oblige and engage broader set of institutions in its implementation, such as municipalities, etc.

The overall assessment of Roma NGOs about the NRIS is that it is step forward: it demonstrates political will for putting Roma integration higher in the agenda of Bulgarian government and defines proper strategic approach and directions for action. In these terms the NRIS continues and further develops the strengths of the previous Roma integration documents adopted by 3 Bulgarian governments<sup>2</sup>. At the same time the Strategy does not propose change in the Roma integration institutional infrastructure as well as in the monitoring and evaluation mechanisms that proved their inefficiency during the previous years. Important chances in these directions seemed omitted and should be advanced. The added value of the Action Plan is sharply decreased by the lack of financial back up for most of the activities and the absence of new activities, different from the ones performed at present. The Plan is not coherent: some of its parts are relatively reach of activities unlike the others that are modest and formal. It seems that the AP is rather explanatory than planning document. The Appendix “Programs for implementation of the NRIS” would plan concrete and comprehensive operations for Roma integration binding them with European funds absorption and state budget.

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<sup>1</sup> More information see at: <http://www.amalipe.com/index.php?nav=news&id=1101&lang=2>

<sup>2</sup> Framework program for Equal Integration of Roma in Bulgarian Society (April 1999, renewed in May 2010), Strategy for Educational Integration of Children and Students from the Ethnic Minorities (June 2004, renewed in March 2010), Health Strategy for Persons belonging to Vulnerable Ethnic Minorities (September 2005), National Program for Improving the Living Conditions of Roma (March 2006), National Action Plan for the Decade of Roma Inclusion and others

Nevertheless, the Appendix (proposed by the Roma NGOs) was not included in the final version of the documents.<sup>3</sup>

On May 21 the European Commission published its communication “National Roma Integration Strategies: a step forward in the implementation of the EU framework” that assessed the NRISs submitted by 27 Member States and recommended following actions for improving the quality of the Strategies and their implementation. The Communication states that “Member States are making efforts to develop a comprehensive approach towards Roma integration. However, much more needs to be done at national level. Socio-economic inclusion of Roma remains first and foremost the responsibility of the Member States and they will need stronger efforts to live up to their responsibilities, by adopting more concrete measures, explicit targets for measurable deliverables, clearly earmarked funding at national level and a sound national monitoring and evaluation system”<sup>4</sup> The Communication is accompanied by Staff Working Document that assesses every country, including Bulgaria.

The 2013 Commission assessment report "Steps forward in implementing National Roma Integration Strategies" adopted on 26 June 2013 focuses on progress made by the Member States in setting the necessary pre-conditions for a successful implementation of the strategies. These structural pre-conditions (working with local and regional authorities and civil society, allocating proportionate financial resources, monitoring and enabling policy adjustment, fighting discrimination convincingly and establishing national contact points for Roma integration) were already highlighted in the 2012 Commission's assessment report as indispensable to make a progress in 4 pillars – education, employment, health and housing. The 2013 Communication states that “Some Member States significantly rethought or developed their strategies in concrete terms, in particular by seeking to organize horizontal and vertical dialogue as well as coordination for the implementation of their strategies; however, some of the necessary preconditions for successful implementation are still not in place and progress is therefore very slow on the ground.”<sup>5</sup>

The next EC assessment report is expected to be adopted in spring 2014. In October 2013 the EC invited all interested stakeholders to contribute. Special template for contribution was announced.

The present report is prepared by AMALIPE Center for Interethnic Dialogue and Tolerance as answer to the EC call for contributions. It evaluates the implementation of the National Strategy of the Republic of Bulgaria for Roma Integration during 2011 – 2013 in the light of the general and country specific recommendations set by the EC Communications pointed above. The report follows the EC template for contributions.

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<sup>3</sup> [http://www.amalipe.com/files/publications/amalipe\\_statement\\_ec.pdf](http://www.amalipe.com/files/publications/amalipe_statement_ec.pdf)

<sup>4</sup> EC Communication “*National Roma Integration Strategies: a step forward in the implementation of the EU framework*”, p. 16. Available at: [http://ec.europa.eu/justice/newsroom/discrimination/news/120523\\_en.htm](http://ec.europa.eu/justice/newsroom/discrimination/news/120523_en.htm)

<sup>5</sup> EC Communication “*Steps forward in implementing National Roma Integration Strategies*”, p. 12. Available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:52013DC0454:en:NOT>

## CHAPTER 1: POLICY MEASURES

**1.1. Education** (please do not forget to consider measures such as: improving early childhood education and care, reducing early school leaving, encouraging Roma participation in secondary and tertiary education, desegregation measures etc. Please also describe any mainstream measures in the field of education, which are expected to contribute to closing the Roma and non-Roma education gap or any mainstream measures that can have negative implications on Roma and how such negative implications are minimised.)

### 1.1.1. Steps taken since 2011

### 1.1.2. Impact of measures

Priority	1.1.1. Steps taken since 2011	1.1.2. Impact of measures
<i>Early childhood education and care</i>	<p>1. Introducing 2 year obligatory pre-school education: It started with change in the Public Education Act (art. 20) since 05.10.2010. The process is still not completed since some municipalities can not provide enough spaces in their kindergarthen;</p> <p>2. “Social inclusion” project: financed by World Bank. It is directed at early childhood development (0-3 years). The project is implemented in 68 municipalities;</p> <p>3. In 2013 the Trust for Social Achievement started to implement project for ensuring higher enrollment of Roma kids in pre-school education via ash conditionalities. The project is supported by World Bank. It will be implemented in 240 places by local NGOs</p>	<p>1. This is mainstream measure that would benefit also the Roma children. The idea is to make children better prepared ffor the school, incl. to help them obtain better command of Bulgarian language. In this regard the measure is strongly positive. Nevertheless, most of Roma children continue to not attend pre-school groups and no steps are undertaken at community level to ensure the higher enrollmen rate of Roma children</p> <p>2. The project is ongoing at present and no final evaluation of its impact could be done. Our preliminary observations are that it is attractive for the municipalities mainly because of its “hard” component that allows them to make renovations in the buildings. Less attention is paid on introducing new methodoloigies and new community-based social services for supporting the family although this shoould be the core of the project.</p> <p>3. The project is in its planning period and the field work will start since September 2014</p>
<i>Reducing early school leaving</i>	<p>1. Full-day schooling for all students in the focal-point schools is introduced: initially this was done with state budget funds. Since</p>	<p>1. This is mainstream measure that benefits also the Roma children. It has good impact of keeping the children at school and plays important preventive role. As weakness should be outlined</p>

	<p>2012 it happens with financing from Human Resources Development OP. “Focal point schools” are more than 700 schools that educates students from places where no school exist – mainly in the rural areas</p> <p>2. Full-day schooling for the students from 1 to 4 grade is introduced in all schools with state budget</p> <p>3. the National program “At school without absences” is managed by Ministry of Education since 2012 to support schools with many absences per student to prepare and implement school programs for reducing the early school leaving</p> <p>4. Within Human Resources Development OP three targeted calls were implemented in 2011-2013 with the purpose to ensure the quality integration of Roma children in primary schools:</p> <p>“Integration of children and students from the ethnic minorities in the school system”</p> <p>“Educational integration of children and students from the ethnic minorities”</p> <p>“Re-integration of school dropout”</p> <p>Within these calls projects of schools, municipalities and NGOs were supported</p>	<p>that it does not contain any element for introducing innovative pedagogical methodologies, for example intercultural education. This decreases its efficiency</p> <p>2. See the comment above</p> <p>3. The measure transponds at national level the know how from the project “Decreasing the dropout rate of Roma children” of Center Amalipe. It supports the schools to prepare and implement school policy that is an important element</p> <p>Nevertheless, no assessment is done until now to measure its impact</p> <p>4. HRD OP became important tool for supporting the policy for educational integration that is strongly positive fact. Nevertheless, several weaknesses are visible:</p> <ul style="list-style-type: none"> <li>- the projects are only locally based / municipal ones that limits their effectiveness regarding the national aspect of the policy;</li> <li>- the beurocrathic procedures for reporting discourage many beneficiaries to implement projects;</li> <li>- the financial rules are limiting the possibilities for participation of smaller beneficiaries: smaller schools and NGOs</li> <li>- there was a discouraging example with the scheme “Integration of children and students from the ethnic minorities in the school system” that was converted from desegregational to segregational one because of mistake in interpretation done by Ministry of Education. This was a sign for very low political commitment</li> </ul>
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	<p>5. The Center for Educational Integration of Children and Students from the Ethnic Minorities - COIDUEM (structure of Ministry of Education) announced several call for proposals for decreasing the early school leaving, introducing intercultural education and desegregation. The calls were open to schools and municipalities. They were announced on annual basis</p> <p>6. Certain NGO initiatives contributed significantly for designing and testing activities for ensuring that Roma children will fulfill at least primary education. The project of Center Amalipe “Decreasing the dropout rate of Roma students” financed by America for Bulgaria Foundation was the biggest one. In 2013 it was implemented in 174 schools all over Bulgaria. Roma Education Fund also financed local initiatives for preventing early school leaving</p>	<p>5. The impact of these calls is positive. The projects supported were small-scale. Since the application procedures were flexible and well-designed, they gave the chance even of small village schools to implement certain initiatives. There Is clear need for extending the budget of COIDUEM in order to reach more schools, especially the rural ones</p> <p>6. The impact and results achieved are strongly possitive. For example, the dropout rate decreased from 2,20 % to 0,6 %, etc. The biggest challenge in this case is to involve Ministry of Education in ensuring that the model will be applied in bigger number of schools</p>
<p><i>encouraging Roma participation in secondary and tertiary education</i></p>	<p>1. Only few NGO initiatives contributed for raising the number of Roma who study secondary education. State funded initiatives in this direction did not exist.</p> <p>For example the Trust for Social Achievement financed several NGOs to carry out Scholarship Program for Secondary School Students. Within the program textbooks and transportation pass (for students from the rural areas) is provided.</p> <p>2. The Ministry of Education prepared National Program for Decreasing the Early School Leaving that covers the Primary and Secondary Education. Center Amalipe took part in preparing the Program. It sets as main target to decrease the number of school</p>	<p>1. These initiatives had positive impact. Nevertheless, it is limited in scope since they covered relatively few municipalities and students. The absence of Ministry of Education in developing such policies is disturbing fact</p> <p>2. The Program is positive fact. The biggest challenge will be its implementation</p>

	<p>leavers to 11 % in 2020. The program was adopted with Decision of the Council of Ministers in October 2013</p> <p>3. regarding Roma participation in high school / university education, only private donors / NGO initiatives existed. The Ministry of Education has not contributed.</p> <p>For example REF continues its Roma Memorial Scholarship Program for providing scholarships to students from Roma origin</p> <p>Roma Health Scholarship Program is implemented in Bulgaria by OSI – Sofia and Center Amalipe with the financial support of REF and OSI – Budapest. Since 2014 it will be supported within the EEA Grants / Norwegian Grants program</p>	<p>3. These initiatives had strongly positive impact. Nevertheless, it is limited in scope since they covered relatively few students: for example RMUSP provides around 250 scholarships per year, RHSP – around 80. The needs are much bigger.</p> <p>The absence of Ministry of Education in developing such policies is extremely disturbing fact. MoE could use ESF funds with this purpose and Roma NGOs suggested it many times. The answer from MoE is that targeted support means discrimination towards ethnic Bulgarians</p>
<p><i>desegregation measures</i></p>	<p>1. In the draft for new Public Education Act discussed in 2011 - 2012 there were provisions that outlawed the segregation proposed by Roma NGOs. The Act was not voted in the Parliament because of the extraordinary elections. It is not clear whether the new draft will remain these provisions</p> <p>2. One of the calls for proposals announced by Ministry of Education within HRD OP, namely “Educational integration of children and students from the ethnic minorities” has as key goal to support the desegregation process in education.</p> <p>3. The biggest investment in educational desegregation is done</p>	<p>1. It is discouraging fact that the new Public Education Act was not voted in the Parliament. Owing to the advocacy efforts undertaken by Center Amalipe, OSI and other Roma and pro-Roma NGOs the draft presented in the Parliament in 2012 contained several important points that would foster the educational integration (including article that outlawed the school segregation). These texts were approved by the Parliamentary Commission on Education as well as the entire Act. Nevertheless, the resign of the Parliament and the lack of enough political attention to the development of Bulgarian education left the Public Education Act out of the parliamentary agenda and it was not voted.</p> <p>2. Since the projects are in their implementation phase it is difficult to evaluate their effect</p> <p>3. These initiatives had positive impact. Nevertheless, it is limited in scope since they</p>

	<p>by Roma Education Fund that supported Roma NGOs to implement desegregation initiatives in different regions of the country. REFF re-orient this support at Center for Educational Integration of Children and Students from the Ethnic Minorities: in 2012 and 2013 the Center announced call for municipal projects for desegregation</p>	<p>covered relatively few municipalities and students. The absence of Ministry of Education in developing such policies is disturbing fact</p>
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**1.1.4. Brief description of one or two most relevant good practice(s) in the area of education and its/their impact.**

Most of the successful practices are generated by Roma and pro-Roma NGOs. For example:

*DECREASING THE DROP-OUT RATE AMONG ROMA CHILDREN Program:* it is implemented by AMALIPE Center for Interethnic Dialogue and Tolerance with support of Amarica for Bulgaria Foundation. The program addresses the high drop-out rate of Roma children in school age. The project activities further address infrequent attendance of school, low school grades of Roma students, low representation of Roma students in high schools and the low representation of Roma parents in school structures and school life in general. The project is based on the experience Center Amalipe has accumulated during the last years and explicitly the experience accumulated with the development of the “Folklore of ethnos - Roma folklore” SIP program which includes schools from the territory of all Bulgarian regions.

The school programs for dropout prevention and student retention is an essential tool for planning activities targeted at keeping students in school. Each school identifies initially its specific objectives and target group, then the specific activities targeted at retaining and attracting the children depending on the specific problems it faces. General trend of all school programs is that they envisage activities in four key areas:

- Working with teachers - training for all teachers to work effectively in a multicultural environment. This training is conducted on the basis of the ‘Teachers train teacher’ method: mentoring teachers have been trained after which they are due to conduct a training module once a month in the pilot schools following a preliminarily set plan;
- Engaging parents - empowerment and involvement of parents to participate actively in school life by creating a Parent Club which meets on a regular basis to plan on organization issues targeted at active school life of their children and dealing with cases of children at risk of dropping out; participation of parents of Roma ethnicity in a Board of Trustees, establishment and conducting Parental Discussion Forums on specific topics and problems or on their own initiative. Each school has the option to choose which of these three forms to use depending on the state of its parent community;
- Maintaining high levels of activity among students - through the establishment of Student Parliament/Council and its active work on dropout prevention through applying ‘peer education’ approach , etc.;

- Introduction of multicultural and interactive education - in all project schools 'Ethnic Folklore - Roma Folklore' classes have been introduced which played key role in keeping children at school. In addition, intercultural elements have been incorporated in the mandatory school subjects. Many extracurricular activities brought about variety in the learning process.

After tree year implementing the program (2010-2013) the results are:

- Reduced number of dropout children - almost 80%!
- Dropped out level in the past year in those 173 schools (when they were not involved in the project) was 2.20%, while in the end of the school year 2012/2013 - 0.41%. The percentage of dropouts included in the "Ethnic Folklore" elective subject in the past year was 0.32%, while in the first term of 2012/2013 school year was 0.05%
- The number of resolved cases of children in risk is 251 of about 1,000 children; most of them are cases which need permanent care and prevention for children.
- The average number of absences (including all absences - excused and unexcused) in project schools during the first term of 2012/2013 school year dropped to 24.7 absences per student, compared to 110, which is a critical limit adopted by the Ministry of Education. At the same time, the average number of absences per student for those attending "Romani folklore" elective subject is 10.50 (includes all absences, excused and unexcused), indicating that the project intervention significantly reduces absenteeism.

Schools continued into the third year of the program are 22. Results in ongoing schools are particularly indicative of the success of the program.

	Total number of children	Dropouts (%)
2009/2010	4377	2.60%
2010/2011	4388	0.34%
2011/2012	4352	0.22%
2012/2013	4233	0.16%

#### **1.1.5. Brief description of one or two relevant lesson(s) learnt leading to policy review in the field of education.**

Education is one of the strongest fields in the entire Roma integration process in Bulgaria. Since 1999 Roma NGOs generated successful models for educational integration: desegregation projects, introducing intercultural education (through Roma folklore elective classes and other forms), decreasing the drop-out rate of Roma, etc. The Ministry of Education prepared Strategy for Educational Integration and paid certain level of political attention.

During the reported period the following strengths could be outlined:

- Financial opportunities for Roma educational initiatives were opened: mainly through Human Resources Development OP and the Center for Educational Integration – COIDUEM. They provided tools for implementing the policy for educational integration;
- The cooperation between Ministry of Education and NGOs was remained and extended.

At the same time certain weaknesses appeared:

- The MoE commitment to implement and require measures for desegregation of the “Roma schools” situated in the big cities decreased. MoE did not react in a proper way to the tendency of secondary segregation and “white flight” in many schools that became segregated after Bulgarian parents removed their children;
- The closure of hundreds of village schools after the system of per capita financing was introduced increased significantly the number of drop-outs. MoE did not react in a proper way;
- The new Public Education Act was not voted: the process of preparing new Public Education Act started in 2009. Owing to the advocacy efforts undertaken by Center Amalipe, SEGA Foundation and other Roma and pro-Roma NGOs the draft presented in the Parliament in 2012 contained several important points that would foster the educational integration (including article that outlawed the school segregation). These texts were approved by the Parliamentary Commission on Education as well as the entire Act. Nevertheless, the resign of the Parliament and the lack of enough political attention to the development of Bulgarian education left the Public Education Act out of the parliamentary agenda and it was not voted. The new Parliament announced that the work for preparing Public Education Act will be restarted with new draft. Until now such a draft is not published yet.

On the basis of all described above certain recommendations could be outlined:

1. The new Public Education Act should open enough space for the policy of Roma educational integration through introducing State standard for intercultural education, outlawing the school segregation, and incorporating the other suggestions of Roma NGOs;
2. The new Science and Education for Smart Growth OP should contain special investment priority for Roma integration as well as Priority Axis for Educational Integration. The Program should provide the necessary resources for implementing the provisions of chapter Education of the NRIS as well as to envisage active role of NGOs in implementing it (including as concrete beneficiaries);
3. The administrative capacity of the Center for Educational Integration of Children and Students from the Ethnic Minorities should be strengthened and its budget – significantly increased;
4. The political commitment for desegregating the so-called “Roma schools” should be raised;
5. The Ministry of Education should extend its support for NGO initiatives.

**1.2. Employment** *(please do not forget to consider measures such as: ensuring an equal access to mainstream public employment services, measures supporting self-employment and entrepreneurship, measures promoting employment of qualified Roma civil servants, eliminating barriers, including discrimination, to entering to the labour market, etc. ) Please also describe any mainstream measures in the field of employment, which are expected to contribute to closing the Roma and non-Roma employment gap or any mainstream measures that can have negative implications on Roma and how such negative implications are minimised.)*

### 1.2.1. Steps taken since 2011

### 1.2.2. Impact of measures

Priority	1.2.1. Steps taken since 2011	1.2.2. Impact of measures
<i>ensuring an equal access to mainstream public employment services</i>	<p>1. Roma labor mediators are appointed in the local Labor offices within the national program “Activation of inactive people” (financed annually by the state budget within the National Employment Action Plan). Their job is to encourage unemployed Roma to subscribe in the Labor office. Their number varies since many mediators left the position because of the low salary: in 2011 the number decreased to 60, in 2012 it was raised to 95, in 2013 it was around 80-85.</p> <p>2. Within Priority Axis 5 of HRDOP a call for proposals for social enterprises BG051PO001-5.2.06 “Social services for social inclusion”<sup>6</sup> was implemented in 2011-2013. Another similar scheme was called “New opportunities”<sup>7</sup></p> <p>3. In 2011 – 2013 targeted call for proposals BG051PO001-1.1.07 “Take the life in your hands” was implemented with financing from Human Resources Development OP<sup>8</sup>. It aimed to reach the most marginalized part of Roma community, namely the inactive long-term unemployed. The call proposed comprehensive set of measures to turn them back to the labor market: community work, qualification, professional</p>	<p>1. The practice is recognized as effective by the Employment Agency. Nevertheless, certain weaknesses disturb the work of the labor mediators:</p> <ul style="list-style-type: none"><li>- their job place is in the Labor offices and no community work / outreach at grass-root level within the Roma neighborhoods is included in their job description. There is need to change the job description and to let them work within the community;</li><li>- the salary is very low: around 160 euro that is below the average in the country. As result the mediators often left the position</li></ul> <p>2. Although Roma were mentioned among the target groups of these measures, the Roma participation was very low: for example in 2011 only 886 Roma took part in measures supported within Priority Axis 5 of HRDOP out of 13 247 people<sup>9</sup>. It is clear that the Agency for Social Assistance as intermediate body of Priority Axis 5 of HRDOP did not develop targeted activities to include Roma and failed in this important task</p> <p>3. The scheme was well-designed owing to the cooperation between the Managing Authority and Roma NGOs (it was proposed by the Roma NGO representative in the Monitoring Committee of HRDOP Deyan Kolev). Nevertheless, it was not attractive enough and the number of applications was low that led to decrease in the budget of the scheme. The projects reached certain most excluded Roma groups that is very important outcome. It is necessary in the future similar scheme to be announced with more attractive</p>

<sup>6</sup> [http://ophrd.government.bg/view\\_doc.php/4446](http://ophrd.government.bg/view_doc.php/4446)

<sup>7</sup> [http://ophrd.government.bg/view\\_doc.php/5062](http://ophrd.government.bg/view_doc.php/5062)

<sup>8</sup> [http://ophrd.government.bg/view\\_doc.php/5091](http://ophrd.government.bg/view_doc.php/5091)

<sup>9</sup> *Годишен доклад за изпълнението на ОП РЧР за 2011 г. (Annual Report for the implementation of HRD OP 2011)*, p. 148

	orientation and subsidized employment.	provisions
<i>measures supporting self-employment and entrepreneurship</i>	<p>1. No Roma targeted measures are implemented by the state institutions. No targeted measures for encouraging Roma self-employment were announced within HRD OP although the indicators for measuring the impact of HRDOP in Roma community required such measures<sup>10</sup></p> <p>2. The “Land – Source of Income” Foundation is providing small loans to Roma who want to buy land and start small-scale business initiatives. The program is open mainly to Roma from the rural municipalities but also support some initiatives of Roma who live in cities. The program is financed by America for Bulgaria Foundation</p>	<p>1. This resistance to announce Roma targeted measures in the field of employment is “justified” by the state institutions with the argument that such measures would be discrimination towards the majority. This sharply contradicts the EU Framework for NRIS as well as the principle 2 “<b>Explicit</b> but not exclusive <b>targeting</b>”. As result, the implementation of the indicators for Roma self-employment set in Human Resources Development OP is close to zero: see the information below</p> <p>2. This initiative has strongly positive impact. It creates efficient and effective model for supporting Roma self-employment. It is necessary this model to be extended in other municipalities and regions. Funds from ESF should be used for this purpose</p>
<i>measures promoting employment of qualified Roma civil servants</i>	<p>1. No Roma targeted measures are implemented by the state institutions.</p> <p>2. The program “Start in the career” managed by Ministry of Labor and Employment Agency encourages all qualified graduated students to start work as civil servants, including Roma</p> <p>3. HRDOP supported measure for raising the capacity of Employment Agency to work with vulnerable groups: <b>BG051PO001-6.1.05</b> Raising the quality of the services delivered by Employment agency with accent on the vulnerable groups (Phase 1 approved by the Monitoring Committee of HRDOP in May 2010 and Phase 2 approved in November 2011)<sup>11</sup>. Within the</p>	<p>1. See the comment above. Although there is no available information, it is well recognized that the percentage of qualified Roma who are employed as civil servants is insignificant<sup>12</sup></p> <p>2. Although there are positive examples, the number of Roma who participate in the program “Start in the career” is very low<sup>13</sup></p> <p>3. Although there was a provision that representatives of vulnerable groups would be selected preferable if they cover all the criteria, the number of employed Roma was insignificant: around 10 out of 350. In 2012 Center Amalipe encouraged 37 Roma to apply for the position of labor mediator within the scheme <b>BG051PO001-6.1.05</b>. Only 2 of them were employed although all of them met the necessary criteria. This could be defined as indirect discrimination.</p>

<sup>10</sup> HRDOP 2007-2013 contains special chapter “Areas of assistance with regard to Roma community”. The chapter contains indicators, among them “Number of Roma included in training for entrepreneurship” and “Number of new entrepreneurs created owing to initiatives for support of the small business”. See: *Оперативна програма „Развитие на човешките ресурси” (Human Resources Development Operational Program)*, p. 146.

<sup>11</sup> [http://ophrd.government.bg/view\\_doc.php/4854](http://ophrd.government.bg/view_doc.php/4854)

	measure 350 labor mediators were assigned in the local Labor Offices to work with the vulnerable groups;	
<i>eliminating barriers, including discrimination, to entering to the labour market</i>	<p>1. No Roma women targeted measures were implemented by the state institutions;</p> <p>2. In 2011 – 2013 Center Amalipe established Community Development Centers (CDCs) in 11 municipalities (with financial support of the European Commission within Daphne and PROGRESS Programs). They work for eliminating certain barriers before Roma people (with accent on Roma women and youth) to enter labor market.</p>	<p>1. The employment rate of Roma women is twice lower compared to the one of Roma men. There is huge need of targeted measures to eliminate the barriers before employing Roma women and youths</p> <p>2. The model of CDCs is recognized as strongly effective by the state institutions and the respective municipalities. There is big interest from many municipalities to have CDC. Nevertheless, until now the model is not institutionalized. It is necessary methodology and financial standard for CDC to be prepared on the basis of the experience generated. It is necessary funds for establishing CDCs in all municipalities with such need to be ensured. ESF and EAFRD should contribute in this direction</p>

**1.2.4. Brief description of one or two most relevant good practice(s) in the area of employment and its/their impact:** the field of employment is relatively poor in regard of the so-called “good practices”. The Roma labor mediators could be perceived as such a practice although it meets serious challenges described above. The other successful experience is accumulated mainly within NGO initiatives implemented in cooperation with local / municipal authorities, business and other stakeholders.

Community Development Centers (CDCs) in Roma community

This is initiative implemented by AMALIPE Center for Interethnic Dialogue and Tolerance within the frames of two projects supported by European Commission within Daphne and PROGRESS programs since 2011. The main goal of the initiative is to empower young people and women in marginalized and traditional Roma communities to fight harmful traditional practices, to raise the level of employment of the young people and women as well as to develop the communities concerned. This happens through:

- strengthening the field work at grass-root level in marginalized and traditional Roma communities via establishing the position of Community moderator,
- developing informal community support mechanisms: such as volunteer Women clubs, Youth clubs, Leaders groups, etc.,
- establishing cooperation with the existing employment and social protection institutions
- implementing joint programs for community development.

Within the initiative 11 Community Development Centers were established in 11 municipalities situated in the 6 NUTS 2 regions of Bulgaria: Lyaskovetz, Strazhitza, Novi Pazar, Kameno, Peshtera, Etropole, Dolna Banya, Byala Slatina, Knezha, Pavlikeni and Veliko Tarnovo. From 2 to 5 community moderators were assigned in every CDC.

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<sup>12</sup> Interview with expert on ethnic and demographic issues from Roma origin in district administration

<sup>13</sup> Interview with Deputy District Governor

The Community Development Centers are innovative service, that is based in the community for strengthening the field work at the grass-root level. They work for both – the single individual and family and for the entire local community. The main engine in their functioning is the idea of activating the entire community: from the youngest child in the neighborhood, village, town and municipality, adolescents to the oldest local resident. The work focus of the centers and community moderators is not the individuals themselves but the community as a whole. The community moderators are in constant contact with the community, with its problems and successes.

The activity of the moderators of the Community Development Centers is aimed primarily at:

v Mapping the Roma community – for this purpose the moderators are visiting every house in the Roma community and based on a survey and conversations they identify risks and develop appropriate prevention activities;

v Creating Community mechanisms for mutual assistance, interest groups and social structures in the Roma community: essential part of their work is to form working habits, skills and discipline in order to promote Roma people at the labor market;

v Performing field work - finding cases, "primary intervention" work, establishing initial contact, mediation between the local community and institutions. Essential part from this work is to promote certain Roma people who participate in the community groups for mutual assistance at the labor market

v Establishing cooperation with the mainstream education, health care, social assistance and employment institutions as well as with the local business. Implementing joint programs and initiatives

**After two year the results from implementing the program are:**

- 74 children and young people were reintegrated in school;
- More than 160 Roma were employed;
- 12 Roma were assisted in starting own business;
- 122 cases of prevention of school dropout;
- 60 children are attending preparatory group for school readiness after the intervention of the moderators;
- 90 children are registered in kindergarten;
- 4 cases of prevention of child abandonment in institutions;
- 18 cases of prevention of violence against children;
- Successfully resolved 28 cases of early marriages, as the young people were returned back to school;
- Assisted 21 young people to continue their education at universities;
- Creation of Youth Clubs to CDC;
- Creation of sports clubs to CDC, with the idea young people from the community to build team skills, communication skills and self-improvement;
- Establishment of creative workshops to CDC, for rationalization of leisure time, for developing imagination and thinking, prevention of school dropout, preventing aggression.
- Established are 10 computer clubs for the local community to develop computer skills and to promote information culture of the local population. The clubs are equipped with computers donated by the municipality of Lausanne, Swiss Embassy and the Bulgarian-Swiss Chamber of Commerce.

The Community Development Centers at present are well recognized as successful practice by Bulgarian government and by the municipalities. The Interministerial Task Force for Resources Provision of Roma Integration approved methodology for Community Center and the new Human Resources Development OP contains possibilities for financing such Centers. There is interest by huge number of municipalities

### **1.2.5. Brief description of one or two relevant lesson(s) learnt leading to policy review in the field of employment**

The field of Roma employment is relatively less developed compared to education and health. Only few good practices exist. Except the Roma labor mediators, all other good practices are developed by NGOs.

During the reported period the only big asset was the opportunity for using ESF financing (through HRDOP) for raising the level of employment in Roma community. Nevertheless, even this opportunity was only partly used.

#### The major weaknesses were:

- The main institutions in the field of employment and social protection demonstrated strong resistance to announce Roma targeted measures stating that such measures would be discrimination towards the majority. This sharply contradicts the EU Framework for NRIS as well as the principle 2 “Explicit but not exclusive targeting”. As result, the implementation of the indicators for Roma employment and self-employment set in Human Resources Development OP was close to zero;
- The measures for encouraging employment were mainly in the field of “subsidized employment” which added value is limited;
- Although good practices appeared within the work of NGOs, the state institutions have not established the necessary preconditions for their institutionalization and sustainability;
- Only limited funds from HRDOP were used for targeted actions for raising the employment level in Roma community.

#### Based on the stated above we can recommend:

1. The next Human Resources Development OP should contain investment priority for supporting Roma integration. Targeted measures for improving the employment level of Roma need to be included in the new HRD OP. Roma women and youth should be special priority target group;
2. The institutions in the field of employment and health care need to extend the scope of Roma targeted measures. Extending the program “Activation of inactive people” (which supports the position of Roma labor mediators) and its re-design could be a good first step. Nevertheless, much more activities and programs are necessary;
3. The Ministry of Labor and Social Policy should extend its support for successful NGO initiatives.

**1.3. Healthcare** *(please do not forget to consider measures such as: ensuring an equal access to quality healthcare, ensuring the basic social security coverage and comprehensive health services to Roma, preventive measures to ensure regular medical check-ups, prenatal and postnatal care and family planning, etc.) Please also describe any mainstream measures in the field of healthcare, which are expected to contribute to closing the gap between Roma and non-Roma in the field of healthcare or any mainstream measures that can have negative implications on Roma and how such negative implications are minimised.)*

#### **1.3.1. Steps taken since 2011**

#### **1.3.2. Impact of measures**

Priority	1.3.1. Steps taken since 2011	1.3.2. Impact of measures
<p><i>Ensuring an equal access to quality healthcare</i></p>	<p>1. The number of health mediators was increased from 105 (2011 and 2012) to 130 (2013). They are financed by the state budget that is important asset. Their employer is the respective municipality: it receives delegated financing from the central state budget about the salary of the health mediator.</p> <p>2. Eight Social and Health Centers in 8 big Roma neighborhoods function. They are managed by Roma NGOs in cooperation with the respective municipality. They are financed by MoH with funds from the Global Fund for Prevention of HIV, TB and malaria.</p> <p>During the reported period the number of the Social and Health Centers was decreased from 10 to 8.</p> <p>3. Open Society Institute – Sofia and Center Amalipe implement Roma Health Scholarship Program. Within it around 80 Roma medical students are supported to study in medical universities. Since the financial support from Roma Education Fund and OSF is close to its end, the program is included in Health care component of EEA Grants / Norwegian Grants and will be supported from Ministry of Education within this financial mechanism</p>	<p>1. The health mediators are well-established and recognized successful practice. Its success is rooted in the good cooperation between Health Problems of Minorities Foundation and Ministry of Health. Nevertheless, the health mediators meet certain problems:</p> <ul style="list-style-type: none"> <li>- low salary;</li> <li>- in some municipalities the employer (the municipal mayor) delegates them only technical tasks that are far from their main responsibilities;</li> <li>- the distribution of health mediators is unequal: there are entire districts without mediator. The needs are much bigger compared to the resources provided by the state budget</li> </ul> <p>2. The Social and Health Centers have positive impact among the local communities. Nevertheless, their financing ends in 2014 (since the Global Fund ends its program in Bulgaria) and there is no vision about their future. There is real danger the Centers to be closed</p> <p>3. RHSP has strongly positive impact on raising the number of Roma health professionals, overcoming discrimination and fostering the entire process of Roma Health Integration. The fact that the program is included in Health care component of EEA Grants / Norwegian Grants and will be supported from Ministry of Education within this financial mechanism is strongly positive.</p>

<p><i>Ensuring the basic social security coverage and comprehensive health services to Roma</i></p>	<p>1. Overall, no Roma targeted measures are implemented in this regard. The conditions for obtaining the status of health insured person deteriorated that raised significantly the number of health not insured. This is a common problem for many poor and unemployed Bulgarian citizens, including Roma</p> <p>2. The Program for TB prevention and HIV prevention operated by Ministry of Health (with funds from the Global Fund for Prevention of HIV, TB and malaria has special component for Roma community. It is implemented by regional level NGOs. In 2012 it was implemented in almost all districts in Bulgaria. In 2013 the coverage of this component decreased only to several districts</p>	<p>1. It seems that there is no political will for ameliorating the conditions for obtaining the status of health insured person and for making the health insurance system more inclusive. This appears as the one of the biggest problems that disturb the access of Roma and many other citizens to quality health care</p> <p>2. The special Roma components of the National program for Prevention of HIV/AIDS and TB in Bulgaria have strongly positive impact. It is very important that the implementation is outsourced to Roma NGOs that is crucial precondition for efficiency and effectiveness.</p> <p>Nevertheless, it is disturbing fact that the MoH has no vision how to continue the program and its Roma components after the end of Global Fund financing. Urgent steps in this direction are necessary</p>
<p><i>Preventive measures to ensure regular medical check-ups, prenatal and postnatal care and family planning</i></p>	<p>1. The Regional Health Inspections have to organize awareness raising and preventive campaigns in Roma community as part of the implementation of the Health Strategy for Integrations of Persons belonging to Vulnerable Ethnic Minorities. They have modest budget for this. They organize such campaigns usually with the support of the local Roma NGOs.</p> <p>2. Within Phare Program special Mobile Cabinets and gynecological examinations in rural Roma communities were delivered. The Ministry of Health provides 200 000 BGN per year for their work setting the goal for 6 000 free examinations</p> <p>3. Several pro-Roma and Roma NGOs implement activities in these</p>	<p>1. Although such campaigns are highly necessary, their extend and efficiency is not high</p> <p>2. The work of these cabinets is a positive fact having into account that immediately after the end of Phare program their future was not clear. Nevertheless, the amount provided by the state budget is far from enough that is the main reason the Cabinets to be used only several weeks per year. The MoH has not used HRD OP or other sources to ensure the funds necessary</p> <p>3. Some of these activities have positive impact but there sustainability remains a big challenge. The resources of HRDOP were not used to</p>

	directions	support such initiatives and no call for proposals within investment priority 5.3. “Employability through better health” was announced within the present planning period.
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**1.3.4. Brief description of one or two most relevant good practice(s) in the area of healthcare and its/their impact**

The field of Roma health integration provides several good models and practices: such as the Roma health mediator, the Health and Social Centers in Roma community, etc. Within the reported period another important positive practice was strengthened, namely the Roma Health Scholarship Program

**ROMA HEALTH SCHOLARSHIP PROGRAM**

In Bulgaria it is implemented by Open Society Institute – Sofia and Center Amalipe with financial support of REF and OSI – Budapest. Initially it started in Romania in 2008. In Bulgaria the RHSP started since 2009 with financing from Roma Education Fund and OSI. Since 2014 it will be implemented with funds from EEA Grants / Norwegian Grants.

The program aims to increase the number of Roma health professionals who work in the health care system. The program supports students from Roma origin who study in medical universities. The program contains the following elements:

- Preparatory courses
- Advocacy camp for the students who are enrolled in university: during the summer. Roma history, Roma groups, specific health problems in Roma community, conflict solution, leadership skills, advocacy skills are taught during the camp
- Scholarship
- Mentorship: every student has mentor who is university professor

The RHSP achieved its main goal to increase the number of Roma students in medical universities. In 2009 their number was 23, in 2011 overall 117 students applied to be included in the Program. Although it started as NGO initiative (of OSI and Amalipe) at present it is recognized by Ministry of Health as one of the 3 leading practices for Roma health integration. That is why it was included in the memorandum for Health care component in EEA Grants / Norwegian Grants and will supported within it.

**1.3.5. Brief description of one or two relevant lesson(s) learnt leading to policy review in the field of healthcare.**

During the last decade certain NGOs experienced different models for improving the access of Roma to health care. Ministry of Health approved Health Strategy for Integration of Persons belonging to Vulnerable Ethnic Minorities.

During the reported period the state institutions tended to support and institutionalized some of the successful practices: the health mediators and RHSP. This is the main strength within the period. Another important strength was the usage of state budget funds for implementation of the Health Strategy for Integration ...: in July 2011 the Council of Ministers approved Action Plan for 2011-14 that envisages (although modest) financing for implementation of some measures.

At the same time several weaknesses appeared:

- Some of the good practices seem to left out of MoH agenda: for example the Health and Social Centers, the entire National Program for prevention of HIV / AIDS and TB in Roma community which future is unclear;
- MoH does not use the opportunities provided by HRDOP (measure 5.3.) to support the implementation of its Health Strategy for Integration ... Although MoH was direct beneficiary and organized several campaigns with HRDOP funds, they did not reach Roma and did not contribute for Roma integration;
- Even the modest financing envisaged in the Action Plan was not fully used because of the lack of enough capacity of MoH: for example in 2012 tender for delivering preparatory courses for Roma who want to apply in medical universities was not organized and the money envisaged (100 000 euro) were lost

Based on everything described above we can recommend:

1. Targeted activities for implementing the Health Strategy for Integration to be included in the next HRD OP
2. New Action Plan for Implementing the Health Strategy for Integration to be prepared in 2014. Significant financing from the state budget, EU funds and other instruments to be ensured
3. The continuation of the Health and Social Centers, the entire National Program for prevention of HIV / AIDS and TB in Roma community to be ensured and financially backed up

**1.4. Housing** *(please do not forget to consider measures such as: eliminating spatial segregation and promoting desegregation, promoting non-discriminatory access to social housing, promoting availability of halting sites for travellers/non-sedentary Roma, etc. Please also describe any mainstream measures in the field of housing, which are expected to contribute to closing the gap between Roma and non-Roma in the field of housing or any mainstream measures that can have negative implications on Roma and how such negative implications are minimised.)*

**1.4.1. Steps taken since 2011**

**1.4.2. Impact of measures**

Priority	1.4.1. Steps taken since 2011	1.4.2. Impact of measures
<i>Promoting non-discriminatory access to social housing</i>	1. The National Program for Improving the Living Conditions of Roma is not implemented since 2009	1. The non-implementation of the National program is strongly disturbing fact. The Program and its Action Plan were examples of well prepared documents in the process of EU accession. For short period (2007-2009) it was

	<p>2. In 2001 the Minister of EU Funds Donchev initiated pilot scheme “Support for ensuring modern social houses...” supported with 16 mln BGN by Regional Development OP. Initially 4 municipalities were approved to take part of the scheme Burgas, Devnia, Vidin and Dupnitsa. After reaction of the ultra-nationalists the mayor of Burgas refused participation. Most probably the project of Varna Municipality will be selected to replace Burgas. At present the implementation in the other 3 municipalities is in preparatory stage</p> <p>3. No other targeted measures are implemented</p>	<p>implemented and after this was stopped.</p> <p>2. The measure is still in its preparatory stage so its impact could not be assessed. Nevertheless, certain elements could be outlined:</p> <ul style="list-style-type: none"> <li>- The operation combines “hard component”(building social houses) financed by RDOP with “soft component” (improving the access to labor market, general education and VET, social and health care services) financed by HRDOP. This is a good design;</li> <li>- The implementation met certain serious difficulties from the very beginning. For example, the ultra-nationalists in Burgas opposed to the project implementation and the mayor of Burgas denied the project. This was a clear sign that the anti-Roma stereotypes could disturb the implementation of the Roma integration activities at municipal level;</li> <li>- In addition, no real reaction by the side of central government was undertaken that was a sign for low political commitment</li> </ul>
<p><i>Eliminating spatial segregation and promoting desegregation</i></p>	<p>1. The pilot scheme “Support for ensuring modern social houses...” is about desegregating Roma neighborhoods and promoting ethnically mixed social housing</p> <p>2. No other measures are implemented</p>	<p>See the comment above</p> <p>Housing appears as the least developed field in the entire Roma integration policy.</p>

#### **1.4.4. Brief description of one or two most relevant good practice(s) in the area of housing and its/their impact**

The good practices in the field of housing are developed mainly at municipal level in some places. Kavarna is example in this direction. Several other municipalities develop similar model based on:

- Regulation and legalization of the Roma neighborhoods;
- Investing in the technical and social infrastructure;

In this way certain Roma neighborhoods are like normal neighborhoods. Nevertheless, usually this model works in relatively small rural municipalities. The experience from the big Roma neighborhoods (called “ghettos”) until now is not successful

#### **1.4.5. Brief description of one or two relevant lesson(s) learnt leading to policy review in the field of housing.**

Although Bulgaria has some of the biggest Roma ghettos all over Europe, the housing appears as the worst and least developed part from the entire Roma integration policy. The National Program for Improving the Living Conditions of Roma has not implemented since 2009. The good practices in this field are limited in scope and number.

During the reported period the only significant initiative was the multi-funded intervention initiated by the former minister of EU funds Donchev. It intended to create a model that could be extended during the new planning period. Except this initiative, the Regional Development OP was not used for improving the living conditions of Roma and seldom reached the Roma neighborhoods. The Rural Areas Development Program also did not improve the situation in the Roma neighborhoods in the rural areas.

Based on the stated above we can recommend:

1. Bulgarian government to restart the implementation of the National Program for Improving the Living Conditions of Roma. ERDF and EAFRD could and should be used for this purpose;

2. The new RD OP to support in targeted way the improving of living conditions of Roma in the urban municipalities. The pilot intervention from this planning period should be extended in significantly bigger number of municipalities. Assigning delegated budgets for infrastructure interventions in the Roma neighborhoods is a must: The presence of Roma neighborhoods is an objective fact that cannot be changed. Deconcentration of most of them is practically impossible. Therefore, dispersion and removal of groups from these areas should be complemented by efforts to regulate and improve the infrastructure and housing conditions in the separated Roma neighborhoods.

Integrated intervention in this field must contain the elements of the above-described intervention and should be supplemented by:

- Activities targeted to alleviate the physical accessibility to other districts and central parts of the city;
- Renovation of social and cultural infrastructure;
- "Soft" measures for de-ghettoization

3. Introduction of "ex-ante conditionality" at municipal level associated with the integration of Roma: It is necessary at national level to introduce conditionalities to municipalities wishing to participate in the implementation of OPRD analogically with introduction of conditionality to the Member States. Some of these conventions should be related to the integration of Roma, for example.:

- Availability of the Municipal Plan for Roma integration / implementation of NSRIBR;
- Presentation of project proposals using funds from OPRD for implementation of the municipal plan

4. Proper measures for improving the infrastructure of the rural Roma neighborhoods to be included in the Rural Areas Development Program: the implementation of RADP should be strongly linked with the implementation of the NRIS

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## **CHAPTER 2. FUNDING**

**2.1. Estimate of funds spent** on measures in the frame of the national Roma integration strategy or the sets of policy measures for improving the situation of Roma, since 2011 (please indicate which of the 4 key areas, or which other area, benefitted from the referred funding)

**2.1.1. EU funds:** Human Resources Development OP (HRDOP) and partly Regional Development Operational Program (RDOP) appeared to be the highest (although still modest) source for financing the Roma integration policy. This was done mainly through the Roma / minorities targeted calls and in much lesser degree through the mainstream calls. As the Annual Report for Implementation of HRD OP for 2011 outlines “Important clarification is that nearly 70 % of Roma included (*in HRD OP implementation*) come from schemes that target Roma community explicitly”<sup>14</sup>.

In 2011-2012 six Roma targeted calls were implemented within HRD OP; within RDOP one targeted call was in its preparatory stage of implementation. In 2013 new calls were not announced. The Rural Areas Development Program remained out of the efforts for Roma integration. It did not support the implementation of the NRIS in targeted way. For example, only 2 of the Local Development Strategies approved within Priority Axis 4 of the Program contain measures for Roma integration that were included mainly because of the activeness of Center Amalipe and OSI – Sofia.

Three assets could be outlined regarding the usage of EU funds for supporting Roma integration during the reported period:

1. For first time multilateral and multi-funded operation for Roma integration was prepared and approved: this was the operation for social housing for marginalized communities initiated by the Minister on EU funds Donchev in 2011. The operation combines “hard component”(building social houses) financed by RDOP with “soft component” (improving the access to labor market, general education and VET, social and health care services) financed by HRDOP. The measure was designed as anti-segregation one: it aimed at supporting ethnically mixed social housing.

Four municipalities were selected as concrete beneficiaries after open procedure for pre-selection in 2011: Burgas, Devnia, Vidin and Dupnitsa. These municipalities are situated in different parts of Bulgaria and have diverse Roma population that would provide chance to test how the model works in different circumstances. In 2012 the mayor of Burgas Municipality denied participation after reaction from the ultra-nationalists. It is expected that the project of Varna Municipality will be selected.

The operation is still in its preparatory stage and it is not possible to analyze its implementation. The design was good but the implementation met certain serious difficulties from the very beginning. For example, the ultra-nationalists from Skat TV in Burgas opposed to the project implementation and the mayor of Burgas denied the project. This was a clear sign that the anti-Roma stereotypes could disturb the implementation of the Roma integration activities at municipal level. Nevertheless, no real reaction by the side of central government was undertaken. It appeared that the central government has no possibility to oblige the local / municipal power to participate in Roma integration projects and that a municipality could absorb EU funds without paying attention to its Roma population and without working for Roma integration. No type of conditionality exists at local level;

2. There is improvement in the engagement of Managing authorities and Intermediate bodies to announce Roma targeted calls: 4 out of 6 targeted calls implemented in 2011-2013 were proposed by

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<sup>14</sup> Годишен доклад за изпълнението на ОПРЧР през 2011 . (Annual Report for the implementation of HRD OP in 2011), p. 42

the representative of Roma NGOs in the HRDOP Monitoring Committee Deyan Kolev in 2009 and 2011. Initially there were a lot of objections by the side of HRD OP Intermediate bodies (and even by the side of the Managing authorities) to have minorities / Roma targeted calls. Gradually these objections were partly overcome and in 2012 and 2013 the institutions suggested to increase the budget of 2 calls. In this way the budget of the call “Educational integration of children and students from the ethnic minorities” that was approved at the amount of 6 mln BGN increased to 22 mln BGN;

3. Certain mainstream calls for proposals included significant number of Roma as final beneficiaries: one of them – “New Chance for Success” had as target group the elderly people without education. Although Roma were not mentioned explicitly, almost all final beneficiaries were Roma and Turks. Roma children were represented also within the scheme “USPEH” for supporting extra-curriculum activities as well as within the scheme “raising the quality of education in the focal-point schools ...”. In the field of employment (Priority Axis 1) such a scheme was “Development” directed at subsidized employment for low-qualified people.

Nevertheless, the mainstream calls that include significantly big percentage of Roma remained to be exceptions. As a rule, Roma were deeply underrepresented in the mainstream schemes.

As pointed above important weakness could be pointed that the Rural Areas Development Program continued to stay aside from the topic of Roma integration and to not contribute for the implementation of the NRIS – although 60 % of Roma in Bulgaria live in rural areas. The only modest RADP contribution was in certain cases when municipalities and NGOs prepared projects directed at Roma

**2.1.2. National funds:** Special budget allocations for implementing the NRIS were not included in the state budget for 2012 and 2013. Unfortunately, such item was not envisaged also in the Budget 2014. The only modest support from the state budget for Roma integration activities was for:

- The implementation of the Health Strategy for Persons belonging to Vulnerable Ethnic Minorities: through the budget of Ministry of Health.

- State delegated financing for the work of Roma health mediators: through the budget of Ministry of Finance state delegated funds are provided to the municipalities that employ health mediators. The list is provided by Ministry of Health.

- Financing for the work of the Center for Educational Integration of Children and Students from the Ethnic Minorities: within the budget of Ministry of Education special item is envisaged for the work of this Center that is structure of Ministry of Education

**2.1.3. Other sources (where relevant):** In 2011 and 2012 two additional European (but not EU) sources prepared to contribute for the implementation of NRIS. These were:

- EEA Financial Mechanism & Norwegian FM<sup>15</sup>: in 6 Priority fields in contains the requirement for at least 10 % of the money dedicated to Roma. In 2013 these priority areas were still in its preparatory stage and did not contribute at the field. Nevertheless, most of the operators undertook consultations

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<sup>15</sup> <http://eufunds.bg/en/page/22>

with NGOs regarding their concrete priorities that are a positive fact. In October 2013 they presented their plans during a conference organized by the Council of Ministers and Norway Embassy<sup>16</sup>;

- Swiss Contribution to Bulgaria<sup>17</sup>: it has specific Roma component. In 2012 Project Management Unit for this component was chosen after long procedure of selection. This was DG “Structural funds” within Ministry of Labor and Social Policy. The fact that no institution with focus on Roma in Bulgaria was selected by Swiss government to be Managing body for the Roma component is a proxy-indicator that these institutions need serious capacity building. In 2013 experts in the Management unit were assigned and at present they design the concrete measures. The implementation would start in 2014.

**2.2. Estimate for the budget of planned measures** in the context of the national Roma integration strategy or the sets of policy measures for improving the situation of Roma, for 2014-2020 (please indicate which of the 4 key areas, or which other area, is planned to benefit from the referred funding)

**2.2.1. EU funds**

<b>Operation, financial instrument</b>	<b>NRIS priority and Explanation</b>	<b>Period of implementation</b>	<b>Financing BGN</b>
Take the life in your hands <sup>18</sup>	<b>Employment:</b> projects directed at the inactive long-term unemployed	2011-2012	6 526 073
Integration of children and students from the ethnic minorities in the school system, HRDOP	<b>Education;</b> Projects of schools, municipalities and NGOs to prevent early school leaving. Initially it was approved as scheme for supporting desegregation but owing to technical mistake of Ministry of Education only projects of segregated schools were approved	2011-2012	5 449 578, 20
Re-integration of school dropout; HRDOP	<b>Education;</b> Projects of schools, municipalities and NGOs to integrate back at school dropouts	2012 - 2014	2 955 272
Educational integration of children and students from the ethnic minorities; HRDOP	<b>Education;</b> Projects of schools, municipalities and NGOs to overcome school segregation, introduce intercultural education, etc.	2011 - 2015	22 207 222,32

<sup>16</sup> <http://www.eegrants.bg/en/2009-2014/%D0%BD%D0%BE%D0%B2%D0%B8%D0%BD%D0%B8/third-annual-meeting-on-the-implementation-of-the-eea-and-norway-grants.html>

<sup>17</sup> <http://eufunds.bg/en/page/20>

<sup>18</sup> [http://ophrd.government.bg/view\\_doc.php/5091](http://ophrd.government.bg/view_doc.php/5091)

New Chance for Success; HRDOP	<b>Education;</b> Literacy courses for illiterate people implemented by Ministry of Education	2012 – 2014	15 000 000
INTEGRA; HRDOP	<b>Education, Employment, Health care;</b> Soft measures (improving education, social services and employment) in 4 municipalities where social housing is supported by RD OP	2012 – 2015	4 814 043,03
Social housing ...; Regional Development OP	<b>Living conditions;</b> renovation or building social houses for marginalized groups in 3 municipalities	2012-2015	11 000 000
Developing complex measures for integration ...; HRDOP	Implemented by Ministry of Labor for research of the most marginalized Roma neighborhoods design of complex measures	2012 - 2013	800 000

**Overall: 68 752 188, 55 BGN or 35 257 532, 59 euro**

### 2.2.2. National funds

As pointed above, the state budget financing is limited to:

- The implementation of the Health Strategy for Persons belonging to Vulnerable Ethnic Minorities: the Action Plan for this Strategy approved in July 2011 envisaged 1051 000 BGN (or 539 000 euro) for 2012 and the same amount for 2013 to be provided by the state budget. Unfortunately even this modest amount was not fully absorbed: Ministry of Health did not organize the necessary public tenders at time and most of the money were not absorbed;
- State delegated financing for the work of Roma health mediators: The state budget provided financing for 105 mediators in 2012 – exactly the same number as in 2011 although much bigger need was identified. In 2013 their number was increased to 130;
- Financing for the work of the Center for Educational Integration of Children and Students from the Ethnic Minorities: the amount in 2012 did not exceed 1 266 511 BGN<sup>19</sup>

**2.2.3. other sources (where relevant):** Both EEA Financial Mechanism & Norwegian FM and Swiss Contribution in their Roma integration parts were at preparatory stage within the reported period.

### 2.3 Brief description of one or two most relevant good practices in the funding area.

<sup>19</sup> <http://coiduem.mon.bg/page.php?c=32&d=203>

### **2.3.1. Task Force / Working Group for Resources Provision of Roma Integration**

Task Force / Working Group for Resources Provision of Roma Integration was established with order of the Prime Minister P-193/02.08.2012. The Group was established at political level: it was chaired by the Minister on EU Funds and composed by Deputy-ministers and executive directors who chair the Managing authorities and Intermediate bodies of different EU funded programs. This was important asset and precondition for taking important political decisions. Another important asset was that the Group incorporated also representatives of Roma NGOs elected after special procedure of nominations. In this way the Roma participation in this political level Group was ensured.<sup>20</sup>

At the beginning of 2013 the Group updated and approved (On February 26) the Appendix "Programs for Implementation of the NRIS" that contained concrete programs (financed by EU funds and the state budget) to be announced up to 2020. The existence of this Interministerial Task-Force and the Plan with programs were included as the positive example from Bulgaria in the EC Communication "Steps forward in implementing National Roma Integration Strategies"

In October 2013 the Groups was re-established that is a positive development<sup>21</sup>. At the same time its political character was put under question: although the deputy ministers responsible for EU funds remained in the Group, it was chaired not by the Minister on EU Funds but by the Secretariat of the NCCEII that is an administrative (not political position). The time will reveal whether this important Task force will remain as political structure or will became expert group without real competences.

### **2.3.2. The Appendix "Programs for implementation of the NRIS"**

The Appendix "Programs for implementation of the NRIS" was proposed by Roma NGOs in 2011 during the process of preparing the NRIS. It was approved by the Interdepartmental Working Group for preparing NRIS, submitted for approval to the Council of Ministers, received approval by most ministries (in the coordination table substantial objections have not been available) and at the session of the Council of Ministers no objections against it have been raised. Nevertheless, the Appendix was not included in the Council of Ministers Decision № 1/ 5.01.2012 and was not published. Later the Appendix was submitted to the Task Force / Working Group for Resources Provision of Roma Integration. After discussions it was approved during the session of the Group on February 26, 2013<sup>22</sup>.

The plan is divided in two parts: programs during the current programming period and programs in the new programming period (2014-2020). It contains 45 proposals for programs that will be funded with EU funds (Operational Program "Human Resources Development" Operational Program "Regional Development" Operational Program "Science and Education", Operational Program "Good Governance" and the Program for Rural Areas Development), the state budget, the EEA Financial Mechanism and the Bulgarian-Swiss program. Via these programs the activities will be implemented under the Action Plan for implementation of the National Strategy for Roma Integration.

The approved plan would provide the necessary financial resources for the implementation of the National Strategy of Republic of Bulgaria for Roma integration, as well it would introduce additional mechanisms for the implementation of the strategy. As an example during the new programming period the plan focuses on integrated interventions that include education, employment, healthcare,

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<sup>20</sup> More information see at: <http://www.amalipe.com/index.php?nav=news&id=1275&lang=2>

<sup>21</sup> <http://www.amalipe.com/index.php?nav=news&id=1768&lang=2>

<sup>22</sup> <http://www.amalipe.com/index.php?nav=news&id=1488&lang=2>

and improving of the housing conditions. Provided is the municipalities to develop integrated projects to meet their municipal plans for integration, which have to be financed through EU funds and the state budget. A targeted investment for activation of local Roma communities is also provided: through the establishment of community centers at the municipal level, which will be implemented by NGOs in partnership with the municipalities. Provided are also resources for the implementation of standardized Integration interventions that will follow approved methodology and clear financial standard.

Nevertheless, the status of the Plan is still not ensured. Because of the resign of the government, it was not voted by the Council of Ministers. During the meeting of the Working Group for Resources Provision of Roma Integration its new chair Mrs. Ivanova announced that the Plan will be updated and voted in the Council of Ministers. Until now this is not a fact.

#### **2.4. Brief description of how lessons learnt from the current programming period will be taken forward.**

In 2012 Bulgaria started to prepare its programs for the next planning period. 2013 was crucial for the process. It is managed by the respective Managing authorities and by the Minister on EU funds. Until the end of 2013 the Partnership Contract, the operational programs and the Rural Areas Development Program had from 2 to 5 drafts.

Important asset of this process is that NGOs participate in it in a transparent way. There were procedures of selecting NGO representatives in the Working groups who were elected by the groups of NGOs. After this procedure the NGO representatives participate on equal basis in the Working groups that prepare the Partnership contract and the Programs. They advocate successfully for incorporating Roma integration topics in the next planning documents.

Until the end of 2012 the following results were achieved:

1. In the Working group for preparing the new HRD OP were elected Deyan Kolev (Amalipe) and Gancho Iliev (World without borders Association) as representatives of the group of Roma organizations. They participate actively in the process since August 2012;

2. In the Working group for preparing the Science and Education for Smart Growth OP is included Deyan Kolev: in January 2013 Bulgarian government decided to propose this new Operational program that would combine finds from ESF and ERDF. Initially it was prepared without Roma NGOs participation. In September 2013 this mistake was repaired and Roma organizations were invited to participate in the process;

3. In the Working group for preparing the new Good Governance OP is included Milena Ilieva (World without borders Association);

4. In the Working group for preparing the new Rural Areas Development Program is elected Yulia Grigorova (representative of WWF and Amalipe);

5. The present draft of the HRD OP contains investment priority “Integration of marginalized communities such as Roma”. This priority will support the implementation of integrated multi-sectorial projects that cover 3 sub-priorities:

- Improving the access to employment;

- improving the access to social and health services;
- Development of the local communities and overcoming the stereotypes

This provides unique chance for financing integrated projects for implementing the “soft measures” envisaged in the Municipal Roma Integration Plans. Nevertheless, serious problem at this stage is that “Access to education” dropped-out from this investment priority after January 2013 when the government decided to form new Science and Education for Smart Growth OP. If this remains in that way, the municipalities would need to apply for implementing their Municipal Plans before 3 different programs – HRD OP, Science and Education for Smart Growth OP and Regions in Development OP that would discourage most of them.;

6. The present draft of Science and Education for Smart Growth OP also contains the investment priority “Integration of marginalized communities such as Roma”. The last draft also contains special Priority Axis for supporting the educational integration of minority children and children with disabilities

7. Unfortunately until now the suggestions of Roma NGOs are still not included in Rural Areas Development Program. It is still not included also the suggestion for dedicating funds for raising the capacity of the Roma NGOs as well as of the institutions engaged with Roma integration in the new Good Governance OP. The efforts in this direction should continue.

### **CHAPTER 3: OTHER INFORMATION**

#### **3.1. Development of legislative and normative framework for implementation of the NRIS**

**No normative or legislative changes were done to facilitate the NRIS implementation at national level in 2012 - 2013.** Some important chances were missed:

- Working Group for suggesting normative changes with regard to NRIS implementation was created with Order of the Deputy Prime Minister Tzvetan Tzvetanov from July 25, 2012. The group was set at administrative (not political) level composed by experts from all relevant ministries. Representatives of Roma NGOs were also included in the group: they were elected after procedure in the National Council for Cooperation on Ethnic and Integration Issues. The Order set end of December 2012 as deadline for presenting suggestions for normative changes in the Council of Ministers. Later the deadline was extended to end of February 2013. The resign of the government in February 2013 prevented the Group to propose suggestions for legislative and normative changes. The Group was not re-established after the new Parliament and new Council of Ministers were elected

*The existence of Working Group for suggesting normative changes with regard to NRIS implementation was positive fact. Nevertheless, its efficiency was very limited because of the composition (the group included experts without political mandate to take decisions on deeper changes) and the lack of strong political guidance what kind of changes could be approved. As a result the Group did not produce any outcome and no positive development followed*

- The new Public Education Act was not approved: the process of preparing new Public Education Act started in 2009. Owing to the advocacy efforts undertaken by Center Amalipe, SEGA Foundation and other Roma and pro-Roma NGOs the draft presented in the Parliament in 2012 contained several important points that would foster the educational integration (including article that outlawed the school segregation). These texts were approved by the Parliamentary Commission on Education as

well as the entire Act. Nevertheless, the resignation of the Parliament and the lack of enough political attention to the development of Bulgarian education left the Public Education Act out of the parliamentary agenda and it was not voted. The new Parliament announced that the work for preparing Public Education Act will be restarted with new draft. Until now such a draft is not published yet.

### **3.2. Development of institutional framework for implementation of the NRIS**

Part “VII. Mechanisms for implementation of the integration policy” from the National Roma Integration Strategy re-affirmed the existing institutional framework and division of responsibilities. The institutions of the executive power remained their role to manage the integration policy in the certain field (for example, Ministry of education is responsible for educational integration, etc.), the coordinating role of the National Council for Cooperation on Ethnic and Integration Issues was also re-affirmed. The only exception was a sentence in the Action Plan that envisaged a political level Inter-ministerial Working Group for Resources Provision of Roma Integration to be established under the patronage of the Minister on EU Funds. The Strategy called for “forming and maintaining the necessary administrative capacity in the key responsible institutions” that was an obvious need having in regard the lack of any administrative infrastructure that deals with Roma integration in the key ministries at present.

During the reported period the only significant change in the institutional framework for NRIS implementation was that the Working Group for Resources Provision of Roma Integration was formally established with order of the Prime Minister P-193/02.08.2012. This positive fact is described in Chapter 2.

At the same time significant deterioration in the administrative framework for NRIS implementation was marked: the Roma organizations left the National Council for Cooperation on Ethnic and Integration Issues (NCCEII): this happened on April 8, 2013<sup>23</sup> after the Council did not react to several cases of ethnically motivated murders of entire Roma family and several other Roma people. The Roma NGOs required profound institutional change in the NCCEII<sup>24</sup> and boycotted its work until their suggestions are not discussed.

From years the NCCEII has very low legitimacy and no real power. After the boycott of the Roma NGOs it was left without any legitimacy. This is an important fact since the Secretariat of the NCCEII is national contact point for the NRIS. The Secretariat itself is also left without legitimacy. The time for profound restructuring of the NCCEII and its Secretariat came in 2013 although no real steps were undertaken by Bulgarian government

### **3.3. Regional and Municipal Planning**

The National Strategy of the Republic of Bulgaria for Roma Integration requires all municipalities to prepare and adopt Municipal Roma Integration Annual Plans. During the second half of 2012 the National Council for Cooperation on Ethnic and Integration Issues (NCCEII) initiated process of preparing the Municipal Plans. In October and November 2012 pilot exercise was implemented in 3 municipalities in Sofia-district. On November 15 the Deputy Prime-minister and Chair of the NCCEII Tzvetan Tzvetanov issued instruction package for preparing Municipal Plans and District Strategies for Roma Integration. The instructions envisaged two-stage process:

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<sup>23</sup> <http://www.amalipe.com/index.php?nav=news&id=1549&lang=2>

<sup>24</sup> <http://nccedi.government.bg/page.php?category=151>

- preparing Municipal plans for 2013: until the end of January 2013, later this deadline was extended to the end of February 2013;

- preparing Municipal plans for 2014-2020: until the end of 2013

In this way until the end of March 2013 all districts prepared District Strategies for implementation of the NRIS and 219 municipalities (out of 264) prepared and approved Municipal Roma Integration Plans for 2013. The process of preparing Municipal Roma Integration Plans for 2014-2020 has not started yet.

The efforts for preparing Municipal plans / District strategies for Roma integration are step forward for engaging broader set of stakeholders, especially for engaging the local power that is crucial for making a difference in the entire integration process. At the same time certain weaknesses damaged seriously the Action Plan prepared:

1. There was no vision for “fresh” (i.e. extra-) financial resources for implementing the Municipal plans, especially regarding the first exercise (Plans 2012-13). The municipalities would not receive extra money to implement their integration activities but they were expected to dedicate money within their ordinary budgets.. As result the documents prepared summarized mainstream activities implemented by the certain municipality with only few and limited Roma targeted activities. There were only few new activities. This means that the Municipal plans 2012-2013 could be defined as pedagogical rather than planning documents;

2. The participation of Roma community was recommended but not ensured: The real Roma participation happened mainly in regions with active Roma NGOs (Amalipe, Integro, World without Borders, the Community Development Centers established in 11 municipalities, etc.) and produced limited results because of the time pressure. There were good examples but they were few compared the overall number of municipalities in Bulgaria

All these mistakes could be challenged within the new Municipal Plans for 2014 – 2020. For raising the effectiveness of the new Municipal Roma Integration Plans (2015-2020) certain steps should be undertaken:

1. Clear and strong political guarantee that the Municipal Plans will be financially backed up with specific funds that are extra to the ordinary municipal budgets: the most realistic option is these funds to be provided by Human Resources Development OP, Science and Education OP, Regional Development OP and the Rural Areas Development Program. Funds from the state budget are also necessary. For ensuring this Bulgarian government could initiate:

- including the existence of Municipal Roma Integration Plan as ex-ante conditionality before every municipality that intends to absorb funds from HRDOP, RDOP and RADP;

- including in HRD OP priority area or priority axes “Integration of marginalized communities such as Roma” and indicative activity “Multilateral projects for implementation of Municipal Roma Integration Plans”: in this way the Municipal Plans 2015-2020 would be prepared in much more effective way in order to become the necessary basis for multilateral Roma integration municipal projects;

- including in RD OP and in RADP delegated budgets for implementing the “hard components” of the Municipal Roma Integration Plans;

- including in Good Governance OP or in HRD OP funds for assigning Roma NGOs at regional basis to implement activities for activating the local Roma communities (developing CDCs, campaigns at grass-root level, etc.) and funds for capacity building of the Roma organizations

2. Dedicating specific funds for preparing the Municipal Roma Integration Plans 2014-2020: this could be done within the present Administrative capacity OP or the future Good Governance OP;

3. Dedicating more specific attention at ensuring the real Roma participation in the process of preparing Municipal Roma Integration Plans 2014-2020

### **3.4. Roma participation and Civil society participation**

The EU Framework for NRIS requires the Strategies to be “designed, implemented and monitored in close cooperation and continuous dialogue with Roma civil society, regional and local authorities”. Following this requirement, *consultative process that incorporated Roma NGOs in preparing NRIS and AP was organized in 2011*. Nearly half of the members in the Working group that prepared the documents were representatives of Roma NGOs.<sup>25</sup> In October 2011 a coalition of Roma organizations in close partnership with the NCCEII organized 4 conferences on the main priorities of NRIS that took place in different regions of Bulgaria. Tens of Roma activists participated in different forums for discussing the Strategy and presented their suggestions.

At the same time the results from this cooperation could not be assessed unequally. Two of the key Roma NGO suggestions – the name of the Strategy and the idea to be approved by the Parliament – were incorporated and made the Strategy stronger. At the same time most of the other key suggestions were denied without explanation. For example the Health care part, Housing part and Employment part of the Action Plan did not include nothing from the tens of reasonable proposals of NGOs and independent experts. Some of the important suggestions included in Education part were missed in the last version. The Appendix “Programs for implementation of the NRIS” dropped out because of “administrative mistake”. These examples left most of Roma representatives with the impression that their participation was rather formal and that the decisions were taken without them. Although this impression could not be perceived as completely reasonable, it indicates serious gaps in the consultative process steered by the NCCEII and its Secretariat.

#### In 2012 and 2013 certain improvement was achieved in several directions:

- The Minister on EU Funds Donchev initiated transparent procedure for electing Roma NGO representatives in the Inter-ministerial Working Group for Resources Provision of Roma Integration. The Roma NGO representatives played very active role in the Group and defined its agenda on equal basis with the institutions;

- The Managing authorities of some Programs initiated transparent procedure for electing NGO representatives in the Working groups for preparing the Partnership Contract and the new Programs. In the Group for preparing the new HRDOP Roma NGOs were defined as separate category and elected its representatives. The Roma representatives play very active role in the Group and define its agenda on equal basis with the institutions. Roma NGO representatives are elected also in the working groups that prepare the Good Governance OP and Science and Education for Smart Growth OP;

- The representatives of Roma NGOs in the Monitoring Committee of HRDOP play active role and contribute significantly for linking the Program with the NRIS within the present period.

At the same time significant deterioration in the consultative process led by the NCCEII marked 2013. As pointed above, the biggest Roma NGOs left the Council and claim reform that would allow real

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<sup>25</sup> The Group was formed through Order of the Prime Minister Boyko Borissov

consultative process. Until now the government does not pay attention to these claims. We can state that the consultative process steered by the NCCEII is over.