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TOWARDS FOLLOWING STEPS NECESSARY

Assessment of the National Strategy of Republic of Bulgaria for Roma Integration ¹

After long and controversial consultation process Bulgarian Council of Ministers adopted National Strategy of Republic of Bulgaria for Roma Integration (NRIS) and Action Plan (AP) on December 21. The Decision of Council of Ministers was published at the beginning of January: 1/05.01.2012. This is not the final stage of preparing NRIS of Bulgaria: according to the CoM Decision the Strategy will be proposed for approval to the National Assembly. In addition, one of the important elements from the document, namely the Appendix “Programs for implementation of the NRIS” was missed from the CoM Decision 1/05.01.2012 and is expected to be approved through another Decision. The present statement is based on the documents approved through CoM Decision 1/05.01.2012 despite that the National Assembly could change some of NRIS elements² and that Appendix “Programs for implementation of the NRIS” would add new important dimensions into the AP and the Strategy itself³.

Overall assessment:

It seems that the National Strategy of Republic of Bulgaria for Roma Integration 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 governments⁴. 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 Action Plan could be used as good summary of the activities different institutions perform regarding Roma. It is also step forward having in regard the previous absence of action plans

¹ Center Amalipe is grateful to its partners from World without Borders Association – Stara Zagora, New Way Association - Hayredin, Roma Academy for Culture and Education - Sliven and Roma – Lom Foundation that contributed in drawing the main conclusions for the assessment

² Expected time for approval the NRIS by the Parliament is February 2012

³ Expected time for approval of the Appendix by the CoM is also February 2012

⁴ 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

that transform at operational level the existing strategic documents⁵. At the same time 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. Nevertheless, the omission of it from the Decision 1/05.01.2012 misses the chance to propose a comprehensive set of programs for implementation of the NRIS.

The National Strategy

Realistic national goals and priorities

The strategic document, named National Strategy of Republic of Bulgaria for Roma Integration applies approach that follows principle 2 Explicit but not exclusive targeting from the Ten Basic Principles for Roma Inclusion approved by the Council of European Union. It sets national goals in 6 fields (education, health care, living conditions, rule of law and anti-discrimination, culture and media) that further continues the main priorities from the existing Roma integration documents and are recognized by the stakeholders who work for Roma integration. These priorities were discussed and supported during national thematic conferences organized in October by coalition of Roma NGOs⁶ and the National Council for Cooperation on Ethnic and Integration Issues. Particular exception is “Employment” priority: although Roma and non-Roma organizations (such as UNICEF, National Children’s Network and others) raised numerous suggestions for strategic goals in the field of social inclusion as well as the idea the priority to be re-formulated in “Employment and Social Inclusion” nothing of them was incorporated in the final version of the Strategy.

The same institutional set-up

Part “VII. Mechanisms for implementation of the integration policy” re-affirms the existing institutional framework and division of responsibilities. The institutions of the executive power remain 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 is also re-affirmed. The Strategy calls for “forming and maintaining the necessary administrative capacity in the key responsible institutions” that is an obvious need having in regard the lack of any administrative infrastructure that deals with Romsa integration in the key ministries at present. Up to date, no ministry has any administrative unite dealing with Roma integration⁷ and usually one expert has in his / her responsibilities Roma integration, among several other

⁵ Despite strategic documents existed, as explained above, the Action Plans were exceptions. For example, the Framework Program for Roma Integration had existed without Action plan (only for 2003 – 2004 such a plan was prepared). From years the Health Strategy existed without Action Plan that was adopted in July 2011, etc.

⁶ Center for Interethnic Dialogue and Tolerance AMALIPE, World without Borders Association, New Way Association, Roma Lom Foundation and Roma Academy for Culture and Education

⁷ Such unites at lower administrative level – *отдели* / branches – existed in Ministry of Education and Ministry of Labor and Social Policy. They were disbanded respectively in March 2009 and April 2011

issues⁸. In some of the cases the expert is not engaged at labor contract but at part-time “civic contract”⁹. Nevertheless, the Strategy misses to require change in the present situation envisaging too big variety of cases of possible Roma integration administrative infrastructure, namely “delegating certain responsibilities to directorates, branches, units or experts or forming specialized units”. This summarizes all possible cases and does not plan minimum standard.

The same chapter also calls for “inclusion of municipalities in implementation of the integration policy” that is an important positive requirement having in regard that municipal authorities stay aside from Roma integration policy perceiving it as issue of the central power. Nevertheless, the chapter does not envisage special administrative back up at municipal level in an imperative way, Stating that forming the necessary administrative capacity in the structures of municipal administrations could happen “through delegating certain functions to directorates, branches, units and experts responsible for the integration policy” and requiring “Municipal experts on ethnic and integration issues to be assigned if it is necessary” the Strategy does not propose change in the existing situation.

It seems that NRIS only re-affirms the institutional infrastructure for Roma integration at central and municipal levels without developing it in one of the two possible directions: establishing body / institutions with managing responsibilities (not only coordinating ones) or forming administrative units that deal mainly with Roma integration in the key institutions. The lack of proper administrative back up defines three possible options for the NRIS implementation: formal implementation or even non existing implementation; stronger role of NGOs and other stakeholders in initiating and implementing Roma integration activities; changes in the administrative infrastructure that are not envisage in the Strategy.

Weak monitoring

The Chapter “Monitoring the implementation” leaves the entire monitoring within the frames of the so-called administrative monitoring” that is rather reporting than monitoring. Although NGOs and experts raised numerous suggestions for adding additional mechanisms (as shadow reporting, community monitoring, etc.) they were not included in the final version. In addition, Logframe of indicators for evaluating the entire Strategy implementation is not introduced and the Strategy lacks indicators to measure its fulfillment. This is far from the robust monitoring system required by EU Framework for National Roma Integration Strategies. Serious advance regarding monitoring and evaluation of NRIS is necessary.

Important asset of the NRIS is that it will be proposed for approval to the National Assembly. This was one of the basic demands set by Amalipe and actually all Romani organizations as early as mid-October 2011 ¹⁰. The approval of the Parliament would not only demonstrate strong political will for raising Roma integration higher in the agenda of Bulgarian society but also would engage a broad set of institutions with its implementation. Decision of the Parliament engages municipal authorities, the National ombudsman and other institutions that fall aside from the executive power. This could open a big set of new opportunities for NRIS.

Missing gender perspective

⁸ This is the case of Ministry of Education, Ministry of Culture, Ministry of Labor and Social Policy, Ministry of Regional Development, Ministry of Health, Labor Agency at present

⁹ This is the case with Ministry of health

¹⁰ See <http://www.amalipe.com/index.php?nav=news&id=935&lang=1>

Important weakness of the NRIS is the lack of sensitiveness to the specific challenges the integration of Romani women meet. The Strategy missed gender perspective: it is not articulated as specific chapter¹¹ neither is mainstreamed in the other chapters. For example Education and Employment priorities do not articulate any national goals linked with Romani women. The only exception is “Rule of law and Non-Discrimination” field that incorporates “5. Creating the mindset of recognition of the equality of the Roma women. Encouraging their full individual, social and economic participation in social life.” That is far from enough.

The Action Plan

The existence of Action Plan is strongly positive fact. It is a chance to plan comprehensive program of activities with financing, time-frame and administrative responsibilities for implementing the NRIS.

The AP approved through CoM Decision 1/05.01.2012 transforms in realistic way the strategic goals set in the Strategy into more concrete tasks. At the same time it does not meet the challenge to plan activities and resources for fulfilling the tasks.

Inconsistency

Overall weakness of the Plan is its inconsistency. The main fields are developed without links among themselves that prevents the opportunities for inter-sectorial activities combining education, employment, health care and living conditions. Narrow, one-sector approach is used although it proved its limited effectiveness during the previous year. In addition, the main fields are developed with different approximation: some of them are detailed and split the main tasks into concrete activities unlike the others that are quite general and not detailed. For example, part Education is relatively well developed containing 16 tasks and 40 Activities. Contrary to it, part Employment contains 7 tasks and 8 activities.

Priority field	N of objectives	N of tasks	N of activities
<i>Education</i>	7	16	40
<i>Health care</i>	8	17	39
<i>Employment</i>	5	7	8
<i>Living conditions</i>	1	9	18
<i>Rule of law</i>	4	4	7
<i>Culture and media</i>	2	5	8

Finally, the AP follows different format: its first part (2012 – 2014) uses the format of the Decade of Roma Inclusion Action Plan unlike the other two parts that will follow different format. Using different formats in one the same document is rather sign for ekleptitsizam and inconsistency.

¹¹ Such chapter existed in the Framework Program for Equal Integration of Roma (1999)

Narrow time horizon

Another general weakness of the AP is that it appropriates very narrow time horizon. The Plan sets activities only for the first 3 years explaining that after this mid-term evaluation will be done and new activities will be planned. Having in regard the long term intervention Roma integration requires as well as the very general (strategic) character of the NRIS, the narrow time horizon of the AP does not provide clear picture how the strategic goals will be achieved through activities. This prevents long-term and sustainable interventions that are crucial for achieving the goals set within the Strategy. In addition, in this way the Plan could not influence the next planning period for the European funds in Bulgaria: its mid-term evaluation and planning new activities will be done in period when the Partnership contract and the next Operational programs / Rural Areas Development Plan will have been prepared and signed.

Modest financial back up

The modest financial back up of the Plan is serious general weakness. Although the EU Framework for National Roma Integration Strategies requires “**sufficient funding from national budgets**, which will be complemented, where appropriate, by international and EU funding”, *the AP fails to meet this key requirement*. Most of the priority fields are not backed up with financing or this is financing that has been approved before NRIS and without links to its approval and implementation. *In this term, the added value of the Strategy and its Action plan is very limited*.

Most of the activities envisaged in the AP are not budgeted: the “Funds” boxes are empty, or with information “no financing is necessary” or “within their own budgets”. In fact, 71 out of 120 activities in the Action plan are not budgeted.

Priority field	N of activities	With amount planned	without amount planned
<i>Education</i>	40	13	27
<i>Health care</i>	39	27	12
<i>Employment</i>	8	0	8
<i>Living conditions</i>	18	6	12
<i>Rule of law</i>	7	3	4
<i>Culture and media</i>	8	0	8

In 4 out of 6 priority fields almost all of the activities planned are not budgeted: Housing (12 out of 18 activities are not budgeted), Rule of law (4 out of 7 activities are not budgeted), Culture and Media (no activity is budgeted), Employment (no activity is budgeted). Although some of these activities could be implemented without special budget it is difficult to imagine that most or all of the activities in a certain field do not need financing. Within the Working group that prepared the NRIS and the AP amounts were proposed. Nevertheless, they were removed from the final versions of the documents approved. It is difficult to expect real advance in the fields concerned (Employment, Housing, Culture and Media, Rule of Law and Non Discrimination) without budget and most probably the implementation of the NRIS in these fields will be as formal as it was during the previous years.

The priority fields Education and Health care are better developed compared to the other fields. They envisage broad number of activities (40 and 39 respectively) and set financing for

many of them. *At the same time the AP added value is limited even in these fields* because of two reasons. First one is that *the level of the financing envisaged is far from enough*. Healthcare priority sets as much as 3 153 000 BNG (i.e. 1 617 000 euro) that is very low amount: it is not possible to imagine significant advance in national policy with amount comparable to a local pilot project. Still it is a very positive step that the state budget finances Roma targeted activities (it seems that this amount is composed only by state budget financing) and it is an open possibility to match it with financing from European funds (especially through HRD OP, area of intervention 5.3 “Workability through better health” or through RD OP). The Appendix “Programs for implementation of the NRIS” would solve this task if it is adopted.

The level of financing Education priority sets is higher mainly because it includes the contribution from EU funds (mainly from HRD OP). Although it is difficult to calculate the amount envisaged (because some of the boxes propose “part of ... BGN” or “up to ... BGN”) the Education priority is backed up with up to 45 475 000 BGN (23 320 512 euro). The biggest share of this amount – 43 000 000 BGN – is formed by 5 operations approved within HRD OP, the others 2 475 000 BGN (1 269 231 euro) are contribution from the state budget. It is very positive fact that ESF in Bulgaria is engaged with supporting Roma integration activities and that Roma targeted calls for proposals are announced within HRD OP. These are important steps forward that should be continued. The share of state budget financing seems to be very low and most probably it is underestimated. National programs that target educational integration and are financed with state budget funds could and should be announced. The Appendix “Programs for implementation of the NRIS” would contribute in this direction (it envisages educational programs supported by the state budget and by HRD OP) if it is adopted.

Second reason for stating that even within Education and Health care fields the added value of the AP is limited is because *almost no new activities and budget are planned*. The Health care priority is copy-paste version from the Action plan for implementing the Health Strategy for Persons Belonging to Vulnerable Ethnic Minorities, approved by the Council of Ministers in July 2011 (CoM Decision 589/01.08.2011). Nothing new was included although Roma NGOs and experts proposed certain new activities and increasing the parameters of the old ones. I.e. Health care priority of the AP for NRIS does not bring any new activity or budget to the existing ones.

The Education priority proposes certain new activities along with activities that have been implemented before. It is a weakness that almost all of the new activities are not financially backed up: this makes unclear whether and how they will be implemented. In terms of budget, mainly the “existing before” activities have defined financing: for example, the calls within HRD OP that are already announced. It should be explained that within the Working group for preparing the NRIS all of the activities proposed were budgeted – this could be seen from the draft AP discussed during the conferences organized by Roma NGOs in October as well as during the national forum organized by the National Council for Cooperation on Ethnic and Integration Issues on November 14, 2011. The representatives of Ministry of Education and Roma NGOs who worked on Education part of the NRIS and the AP within the Working group managed to achieve considerable agreement on the main topics discussed, including the necessary financing for all proposed activities. It is not clear why and how in the final version of the AP submitted by the Secretariat of the NCCEII to the Council of Ministers the amounts for most of activities planned dropped out. As a result, Education priority of the AP for NRIS at present does not bring new budget to the existing one.

Explanation in stead of planning

All explained above define the key general weakness of the Action Plan: ***it is not planning document but rather explanatory one.*** In most of its priorities the Plan just summarizes the activities implemented by different institutions or repeats (in copy – paste way) what institutions had planned before to start the process of preparing NRIS and its AP: this is the situation with Health care, Housing, Culture and Media and partly with Employment priorities. Education, Rule of Law and partly Employment priority fields envisage certain new activities but they are not financially backed up that makes their implementation very problematic. In terms of budgeting, the AP also summarizes the existing approved budgets for some activities and almost does not bring new financing. The AP could be seen as pedagogical tool rather than as Plan.

Most probably this is not a result from missing political will since within the process of preparing NRIS key political figures (such as Vice Prime-Minister Tzvetanov, Minister of EU Funds Donchev, Minister on Education Ignatov and others) declared their support for preparing strategic and operational documents that would make a difference in Roma integration. Submitting NRIS to the Parliament is also clear sign for good political will. Most probably the reason for preparing descriptive rather than prescriptive (planning) document is linked with the administrative way of preparing the document (as explained below) and poor conducting of this process.

Weak monitoring and evaluation

The Action Plan contains indicators which purpose is to help monitoring and evaluation of the activities. They are output indicators designed to measure only the products from the activities and not the results (outcomes and impact). For example “number of delivered training events” measure the fact of training event without assessing the change in the trainees or the skills acquired because of the training. The indicators set are quantitative and it is obvious the lack of quality indicators. In addition, every indicator is linked only with certain activity, there is no system of indicators to measure the advance at priority level or overall advance in implementing the entire Plan.

The indicators envisaged could provide information only for the limited needs of the so-called “administrative monitoring”. This is a need these indicators to be further developed into strong Logical framework of indicators through adding quantitative indicators as well as outcome and impact indicators that measure the advance at Priority level and the overall advance in implementing the AP.

New managing structures

One of the strongest parts of the AP is that it sets high-level political body for ensuring the resources for implementation of the Plan. According to the document “The coordination of ensuring resources for the implementation of NAP shall be performed by an Interdepartmental Working group for provision of resources for Roma integration, chaired by the Minister of EU Funds Management. Members of this WG shall be the respective Deputy Ministers chairing the Managing Authorities and Intermediate Bodies of OP Development of Human Resources (OPDHR), OP Regional Development (OPRD) and Rural Areas Development Program (RADP), who participated in the development of the National Reform Program Bulgaria 2020” establishing such a body was one of the main claims of Roma NGOs. From one side it provides the necessary political support for ensuring the resources needed. From the other side, it tends to link the implementation of the NRIS with the National Reform Program Bulgaria 2020 and with the EU funds within the present and the next planning period. It is in line with the requirements from EU Framework for NRIS and is key precondition for dedicating the necessary political and financial attention for the implementation of the Strategy.

Assessment per fields

The Action Plan further continues the main priorities from the Decade of Roma Inclusion - education, health care, housing and employment as well as culture and non-discrimination.

The field of education is relatively well developed and as a whole is a step forward. It sets 40 activities for achieving 16 tasks within 7 objectives. They further continue the main trends from the Roma educational integration policy from the previous years enriching them with some new activities with respect to the new realities in Bulgarian educational system (delegated school budgets, preparing new Public Education Act, standard for intercultural education, etc.). It seems that the good cooperation between experts from Ministry of Education and Roma NGOs lead to well developed plan.

At the same time there are some logical “gaps”. For example, for within Objective 1 “Guaranteeing the right to equal access to quality education, including by integrating Roma children and students in ethnically mixed kindergartens and schools” (i.e. de-segregation objective) four tasks are set. They relate to encouraging ethnically mixed education at pre-school and university level. The school level is missed that is a serious gap having in mind that the main efforts during the previous years have been for desegregation and ethnically mixed schooling at elementary and primary education. In the draft prepared by the Working group activities at school level were included and it is not clear why they dropped out.

As explained above, serious weakness of Education priority is that most of the activities planned are not budgeted: 27 out of 40. This makes the real advance in educational integration strongly conditional and dependent from the political conjecture.

The field of health care is copy-paste version from the Action plan for implementing the Health Strategy for Integration approved by the Council of Ministers in July 2011. Although Roma and non-Roma organizations raised many reasonable suggestions (during conference in October) and within the Working group nothing was included in the last draft submitted by the Secretariat of the NCCEII to the CoM. Important chances for ameliorating the document were missed and it could be asses rather as step backward.

The field of housing contains 18 activities for achieving 9 tasks within one objective. Most of the activities are not financially backed up (12 out of 18) or their financing is far from sufficient. The engagement from the state budget is very modest – 550 000 BGN that includes also contribution from municipal budget. The only (relatively) significant amounts are from Regional Development OP: 15 000 000 BGN for social housing pilot scheme¹² and 5 000 000 BGN for educational infrastructure.

Having in regard the big financial resources managed by Ministry of Regional Development (within its own budget and within RD OP) as well as the well prepared and detailed National program for Improving the Living Conditions of Roma (approved in 2006), the Housing part of the AP seems as a big step backward. It needs serious continuation for overcoming the existing gaps.

The field of employment is one of the less developed fields. It contains very low number of activities – 8 activities for achieving 7 tasks and 5 objectives. The activities are general and often lack specifics. It seems that some of the important activities carried out by Ministry of Labor for Roma labor integration (for example assigning Roma labor mediators with “Activation of inactive people” program) are not included in the Plan.

No of the activities is budgeted: the entire field lacks financial back up.

Serious omission is that the topics of social inclusion and social services in Roma community are not included in the Plan. Many Roma and pro-Roma organizations raised reasonable

¹² Initiated in 2011 by the Minister of EU Funds Tomislav Donchev and implemented at present in 4 municipalities

suggestions for this during conference in October and within the Working group but nothing of them was included.

Strength of the Employment part is that it envisages assigning Roma experts in the Labor offices: this is important step that should be implemented.

Having in regard that Ministry of Labor and Social Policy manages serious financials resources (within Human Resources Development OP and the National Action Plan for Employment), that it is responsible for the social inclusion policy and the social services it is possible and necessary to correct the gaps described.

The Rule of law and Non-Discrimination field envisages 7 activities for achieving 4 tasks within 4 objectives. Among them are included reasonable tasks such as ‘Increasing the number of Roma people appointed in the public administration’ and so on.

At the same time these tasks are not backed up with activities that guarantee the task achieving. For example, delivering training for municipal experts on ethnic issues, creation of data base of young Roma willing to start carrier in public administration and providing internship for young Roma do not guarantee that the number of Roma who work in public administration would increase. The financial back up for the entire field is insignificant: 114 690 BGN (58 815 euro) for 3 years.

The existence of this field is positive initial step as well as to engage the state budget with its activities. The field should be further develop with planning a set of comprehensive activities as well as with engaging additional financing from the European funds (for example through Administrative capacity OP).

The Culture and Media field contains 8 activities for achieving 5 tasks within 2 objectives. Most of them are mainstream activities carried out by Ministry of Culture with added formal “Roma” dimension: for example “2.2.1. Institutional strengthening of the *chitalishte* as modern centers for development of the local communities, including the Roma communities”. No of the activities has defined financing.

It is difficult to expect that the AP in this field could contribute for achieving the objectives set in the NRIS. It is necessary the Plan to be complemented with targeted activities and significant funds (from the state budget and European funds) to be attracted.

The Appendix “Programs for implementation of the NRIS”

The Appendix “Programs for implementation of the NRIS” was proposed by Center Amalipe and a broad group of Roma NGOs as a result of suggestions gathered during four national conferences organized in October. It was approved by the Interdepartmental Working Group, 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. During a meeting with Roma NGOs in January 2012 Vice Prime Minister and Chair of the National Council for Cooperation on Ethnic and Integration Issues Tzvetan Tzvetanov explained that the Appendix is not included in the CoM Decision because of administrative mistake and will be proposed again for approval in the Council of Ministers. Up to date this is not a fact.

The Appendix proposes 41 programs with envisaged financing from state budget and European funds (mainly HRD OP and RD OP). All of them have budget envisaged. Part of the programs have been approved by Monitoring committees of HRDOP and RDOP, the others are planned. The Appendix cover not only the present but also the next planning period: it follows strong logic from pilot programs implemented in the current period to be

extended into national wide initiatives in the next period and finally to be institutionalized for achieving full sustainability.

The Appendix could be seen as continuation of the Action Plan since it backs up and transmits the activities required in the AP into comprehensive programs. Most of the weaknesses of the Action Plan are over if it is considered together with this Appendix (for example, the insufficient financing, the narrow time horizon, etc.). Together with the Appendix “Programs for implementation of the NRIS”, the Action plan would appropriate prescriptive character – to plan activities and programs.

Consultative process

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*. Nearly half of the members in the Working group that prepared the documents were representatives of Roma NGOs.¹³ In October 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.

Conclusions and recommendations

The National Strategy of Republic of Bulgaria for Roma Integration meets most of the requirements set by European Commission and is step forward. Its approval by the National Assembly is important positive step that would engage more institutions (including local authorities). The weaknesses of the Strategy are linked with the institutional set-up and with the monitoring mechanisms: it repeats the existing ones without enriching and developing them although they proved their inefficiency in the previous years.

It is necessary Logical frame of indicators for measuring the implementation of the NRIS to be prepared and approved. Establishing mechanisms for independent monitoring (outside the scope of the administrative monitoring) is also needed: such as shadow reporting, community monitoring at grass-root level and others.

It is necessary normative documents that transmit the Strategy into concrete obligations and responsibilities of the main institutions to be prepared. Local authorities and district administrations should be included in these documents. Mechanism for engaging Managing authorities of the operational program and the Rural Areas Development Program with the implementation of NRIS should be established at central level. The Interdepartmental

¹³ The Group was formed through Order of the Prime Minister Boyko Borissov

Working group for provision of resources for Roma integration, chaired by the Minister of EU Funds Management is good step forward in this direction, it should be further developed. In addition, special steps are necessary to ensure that key points from the NRIS are incorporated in the National Development Program “Bulgaria 2020” and in the Operational programs / Rural Areas Development Program for the next planning period.

The existence of Action Plan is also step forward compared to the previous absence. At the same time it does not meet the requirements of the European commission as well as the needs of Roma integration policy in Bulgaria since it fails to plan activities and resources for fulfilling the tasks. The AP is rather explanatory document that summarizes the existing activities than planning document. Its added value for implementing the Roma integration policy is very limited.

The Plan needs certain fundamental changes and amendments. Approving the Appendix “Programs for implementation of the NRIS” (which status is unclear at present) is first step in this direction. Employment priority needs to be extended to Employment and Social Inclusion and to incorporate important topics such as social services in Roma community and others. Housing priority needs to incorporate much more ambitious activities. Health care priority should include the reasonable suggestions raised during the process of preparing the NRIS and the AP. In addition, preparing strong Logical frame of indicators should be done in the coming months. It has to include not only output indicators but also outcome and impact ones that measure the advance at Priority level and the overall advance in implementing the AP.