

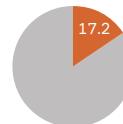
“ Country recommendation

Bulgaria should take action to reform the child protection system and develop a comprehensive and systemic approach aimed at the well-being of the child, rather than fragmented sectoral policies with separate measures for risk groups.

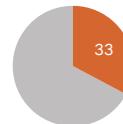
Country Profile 2022



Bulgaria



Child Population:
1.19 million
(17.2% of total population)



Child Poverty Rate:
33% (2021) ▼*

* lower compared to pre-covid rates in 2019

RESPONDENT ORGANISATION(S):

National Network for Children, Bulgaria (NNC)

Hope and Homes for Children – Bulgaria (HHC – Bulgaria) on behalf of Hope and Homes for Children

Know-how Centre for Alternative Care for Children, New Bulgarian University (Know-how Centre)

European Semester Country Report and Recommendations

Overview of the Country Report: identification of the children in need

According to Eurochild members, the *European Semester Country Report for Bulgaria* does not reflect the needs of children in Bulgaria. The country report should outline the main vulnerable groups of children that national policymakers should prioritise. However, there is very little about the situation of children, apart from some minimum content concerning access to education (including early childhood education and care). Moreover, the interventions included in the report are partial, and not part of a cross-sectoral comprehensive policy.

The country report contains **very little focus on children or the key services they need**. Children in

Bulgaria need a strategy on early child education and care (ECEC), a thematic policy on early child development and care, a focus on quality of care and increased capacity of professionals working with children, and an early diagnostics or early child intervention model to work with children under the age of 7, and especially children aged 0 to 3.

Deinstitutionalisation is not mentioned in the country report, despite the ongoing reform and several deinstitutionalisation projects funded by the European Social Fund Plus (ESF+). It is very concerning that despite the aim to close the remaining old type of institutions for children 0-3 years old, by the end of 2022¹, this process is still not finished, and there is no evidence that this will be achieved by the end of the year. There is also **no focus on developing new integrated services for children in the community**.

The country report includes issues regarding Roma children's access to education and school leaving rates. However, there are **no references to effective mechanisms and programmes for the inclusion of children at risk of dropping out of school**, or to effective support needed by families.

The country report states that Bulgaria's National Recovery and Resilience Plan (NRRP) will contribute to improving access to education through relevant measures in education and training that 'include the mandatory inclusion of 4-year-olds in preschool education'.² However, this measure cannot be implemented effectively without a strategy for tackling the lack of overall services and the lack of sufficient services in the capital, in big cities, and in smaller settlements and rural municipalities.

Worryingly, some crucial information is missing. For example, there appears to be no understanding at government and institutional level of the importance of children's right to be heard.

Despite all the problems described by experts and NGOs in previous reports regarding the inclusion and protection of migrant children (including significant numbers of Ukrainian refugee children), there is **no mention of migrant children at all in the report**.

Children in Bulgaria, especially those in disadvantaged and/or in vulnerable situations, were disproportionately affected by the Covid-19 measures. National Network for Children, Bulgaria (NNC), Hope and Homes for Children – Bulgaria (HHC – Bulgaria) and the Know-how Centre for Alternative Care for Children, New Bulgarian University

¹ *Transitional and Final provisions of the Social Services Act*, par. 36.

² *European Semester Country Report for Bulgaria*, p. 7

(Know-how Centre), state that this situation requires **specific research focused on the effects of Covid on children**, including how inequalities were exacerbated, and how these can be overcome.

Children's mental health is not mentioned as well. However, children's mental health is expected to be addressed in the Bulgarian Child Guarantee National Action Plan (NAP). If this is the case, it will be the first time the Bulgarian government recognises the issue of children's mental health through the strong advocacy messaging of Bulgarian civil society organisations.

Regarding children's rights in the digital environment, there is **no focus on child safety and protection in cyberspace**. There is no mention at all regarding the need to cooperate with civil society organisations, and no recognition of their contribution to policies, despite the fact that there are good examples to draw from.

NNC, HHC – Bulgaria and the Know-how Centre felt the most promising reference on investing in children in the country report was 'the participation rate of children under 3 in formal childcare (15% in 2020) has increased compared to previous years, but it is still well below the EU average (32.3%)'.³ Overall, the **references to poverty, social exclusion, participation in the labour market, and the many ongoing challenges related to health and education are not encouraging**.

Needs analysis: alignment at country-level

None of the *Country Specific Recommendations for Bulgaria* concern children's situation directly. However, some specific measures that would improve their situation are included in the National Recovery and Resilience Plan (NRRP), so we welcome the Commission's recommendation to Bulgaria to focus on implementing this plan.

It is expected that in 2022–2023, one of the key deliverables under the NRRP will be the adoption of a Social Support Code, to address the fragmentation of legislation on social benefits and services. However, there is no information as to whether the former government or the new caretaker government has established an Inter-ministerial Working Group to develop the Social Support Code.

The *Ordinance on the Quality of the Social Services* to define quality standards for the provision of social services is a good example of a deliverable that was adopted in alignment with the NRRP. Its purpose is to create conditions for **increasing the quality of social services and their effectiveness**. To achieve this priority, the main emphasis is placed on professional training and continuous professional development for employees who provide social services. The regulation defines the standards for the quality of social and

integrated health and social services, and the criteria for their implementation. The standards are tailored to the type of social service and the specific needs of the people who use it. They include requirements for the organisation and management of services, for the number and qualifications of employees, and criteria for the effectiveness of the results achieved in support of people. The suppliers undertake to provide a sufficient number of employees with the necessary professional training, as well as to provide conditions for increasing their qualifications. The Ordinance also regulates the methods for monitoring the quality of social services by municipalities and other providers, and the Agency for the Quality of Social Services.

Unfortunately, other plans and strategies expected to be accepted in connection with the NRRP were developed with no engagement with stakeholders, in unrealistically short timeframes,

³ European Semester Country Report for Bulgaria, p. 46

and therefore did not benefit from the expertise of civil society organisations. There is a need to strengthen the capacity of State institutions and further develop their understanding of the specific issues concerning children, child rights, and child policies.

Poverty and Social Exclusion – experiences of children, families, and communities

Child poverty in Bulgaria

Bulgaria has a total child population of 1.19 million, 33% of which lived at risk of poverty and social exclusion in 2021.

According to National Network for Children, Hope and Homes for Children – Bulgaria and the Know-how Centre for Alternative Care for Children, the children most in need in Bulgaria are:

1. 'children left behind' (by parents working abroad), especially those living in 'ghettos' and remote settlements, and children of the so-called 'working poor';

2. children with severe disabilities placed in residential care, including in childcare institutions, and children with disabilities without parental care.

To meet the needs of the children most in need, the policy priorities should be to:

1. Invest in **reforming the child protection system.**
2. **Improve the mechanisms and protocols for gathering data** on vulnerable children and provide access to data for stakeholders.
3. **Assess the impact, efficiency, and effectiveness of the interventions** provided in social services for support in the community, including those that are part of the NAP implementation, to gather reliable data on what works and what does not work.

The Bulgarian branch of Hope and Homes for Children provides a good example of

interventions that mitigate child poverty, as acknowledged by UNICEF and the World Health Organisation. The model for Active Family Support (AFS) and District Deinstitutionalisation Coordination Mechanism (DDICM) has been created by HHC – Bulgaria. The project Strategic deinstitutionalisation and reform of the childcare for children between the ages of 0 and 3 began in 2012 and it is funded by the OAK Foundation, Velux Foundation, and Medicor Foundation. The project supported families of children while institutions were closing in Sofia, Plovdiv, Pernik, Pazardjik, Gabrovo, Montana, Targovishte, and Ruse.

The Active Family Support model is a key component of the holistic approach to closing institutions housing children aged 0-3 and for providing assistance to families. This intervention focuses on identifying and supporting children at risk of separation from their parents and of being institutionalised. It was developed by HHC, based on their

20 years of practical experience, in different countries, managing the transition from an institutional to a family-based childcare system. The model provides flexible good practices that can be adapted to different contexts and that involves suitable interventions and services for vulnerable children and families. It is also used to promote the reintegration of children with their biological or extended families. Among the successes of this project includes preventing 2,307 children from being abandoned/ placed in institutions, tracing and reintegrating 211 children with their family, and closing 25 institutions for children aged 0-3.

European Child Guarantee

Bulgaria National Action Plan

The [Council Recommendation on a European Child Guarantee](#) asked Member States to submit a National Action Plan (NAP) outlining how the Child Guarantee would be implemented at national level by 15 March 2022. However, some countries had not published their NAP when Eurochild members provided input. This is the case for Bulgaria.

In January 2022, Eurochild published a [country report for Bulgaria](#) that included recommendations for the Bulgarian government to consider when drafting their Child Guarantee National Action Plans. The Eurochild Child Guarantee Taskforce also provided overall recommendations for all Member States to consider.

These action plans should outline the children most in need, the planned and existing policy actions and measures to

support them, and a monitoring and evaluation framework. The plans should also be drafted in consultation with children, civil society, and national authorities. Although the NAP had not been published when preparing this report, National Network for Children, Hope and Homes for Children – Bulgaria and the Know-how Centre for Alternative Care for Children, New Bulgarian University believe **civil society organisations' inputs and expertise has not been used to its full potential in the drafting process.**

The Know-how Centre has been indirectly involved in drafting the NAP through organisations they collaborate with. However, they have not been invited to participate, although they are a research organisation offering research data proactively to all governmental bodies in the field of child protection and care.

Hope and Homes for Children – Bulgaria was not invited to participate in the inter-institutional working group

set up to develop the NAP, although the organisation is recognised as a worldwide expert on deinstitutionalisation and childcare. However, they developed and presented their proposals regarding deinstitutionalisation of childcare reform and the inclusion of the necessary measures in the plan through their partners from NNC and the [Childhood 2025 Coalition](#). As far as they know, the suggestions they provided have not been reflected in the NAP.

NNC was involved in drafting the plan through the inter-institutional working group, which was active from November 2021 to October 2022. Due to the political crisis in Bulgaria, the change of the Child Guarantee National Coordinator, the outbreak of the war in Ukraine, and the subsequent refugee crisis, the group was practically inactive. It did not meet until the summer of 2022. Although NNC had a partnership with the Ministry of Social Policy and Labour, which has the leading role in the work of the NAP, they believe their expertise was not used to its full

potential. There were very few civil society organisations involved in the working group and they were not representative of all the Child Guarantee key services for children in need. The working group met only 4 times, and the primary communication was by email. The work on the NAP took place mainly in the summer months, when many civil society organisations and experts were on their summer break. Additionally, the deadlines for proposals were extremely short, further complicating the process.

To support the development of the NAP, **NNC organised a series of 6 awareness-raising thematic webinars** aimed at government experts and NGO representatives. A short report with the main conclusions and recommendations was published, based on the outcome of these webinars. Many of these recommendations are included in the final version of the unpublished NAP. The final version of the NAP also includes recommendations from the [Unequal Childhood report](#),

commissioned by UNICEF and drafted by For Our Children Foundation, the Bulgarian National Academy of Sciences, and NNC. NNC believes that **the final version of the NAP they have seen is satisfactory**. However, they have many questions about the methodology for choosing the indicators, the monitoring framework, data collection, and the ambition of its goals.

A lack of continuity of government in Bulgaria raises **concerns for the implementation of the NAP**. The current national government has proposed a mechanism to work with one 'strategic' NAP and several consecutive action plans covering two-year-long periods. NNC, HHC – Bulgaria and the Know-how Centre are concerned that these consecutive action plans would not be developed through consultations with stakeholders but behind closed doors at the Ministry of Labour and Social Policy. The formality of this Ministry during previous cooperation activities with NGOs has left those involved sceptical about future cooperation.

Children were partially involved in drafting the NAP at national and local levels. Generally, the children involved were aged between 14 and 19 years old. Some were children with specific backgrounds, such as Roma children and children from alternative care settings, but other children in need were not represented. It is unknown if the children received feedback after their involvement or if the information they provided was included in the NAP.

The *Children-Researchers programme*, a joint project of UNICEF-Bulgaria and NNC on the European Child Guarantee, focused on child participation and **understanding how to meaningfully involve children in the Child Guarantee**. In 2021, three teams of young people from different parts of Bulgaria were formed and worked on different topics of the Guarantee in their communities. They presented the results through different articles and events. The children underwent training on children's participation and had

an introduction to the goals of the European Child Guarantee. As part of this activity, **young people carried out research** among their peers and in their communities on important issues within the scope of the Child Guarantee, including access to quality healthcare, education, childcare, adequate housing, and adequate nutrition. In addition, three national consultations were held through the *U-Report application in 2021*, a global UNICEF platform, which collects opinions of children and young people through surveys. More than **200 children and young people aged between 14 and 29 took part** all over the country. The main topics of the consultations focused on access for children in need to healthcare, education, and healthy nutrition. The NAP was also discussed within the *Children's Council of the State Agency for Child Protection*. NNC implemented the *Children-Researchers* programme with the support of UNICEF.

From reading the latest unpublished version of the Bulgarian NAP, NNC, HHC –

Bulgaria and the Know-how Centre are pleased to see that the plan includes a **specific goal to reduce the number of children living in residential care**. Furthermore, measures to improve access to social services and support and to provide material and financial support for vulnerable families are also welcome, as NNC, HHC – Bulgaria and the Know-how Centre consider these measures are directly related to preventing family separation.

However, NNC, HHC – Bulgaria and the Know-how Centre **do not believe that the alternative care and deinstitutionalisation reforms are reflected explicitly** and in full in the NAP. The government assured the organisations working towards such reform that the NAP should be considered a continuation of the country's deinstitutionalisation efforts and replacement of an updated action plan for deinstitutionalisation until 2025. However, this has not reassured many in the non-governmental sector working in the field of deinstitutionalisation, who

have repeatedly expressed their concerns about the future continuation of the deinstitutionalisation reform. A considerable challenge remains, and there are concerns about how the deinstitutionalisation process will be managed and monitored if a new *Updated Action Plan for the implementation of the National Strategy Vision for the deinstitutionalisation of children in Bulgaria* (which will be in operation until 2025), is not developed. According to the members of the Childhood 2025 Coalition, integrating activities and the measures for implementing deinstitutionalisation into the NAP poses risks for the successful implementation of the reform. Given the political crisis that has been affecting the country over the last two years, **policies in the area of deinstitutionalisation reform remain unclear and unstable**. NNC, HHC – Bulgaria and the Know-how Centre will continue to advocate for ensuring quality implementation of the deinstitutionalisation reform, which does not end with the closure of institutions for children.

EU Funding

Civil Society engagement in the implementation of EU funds

There are **a variety of European funds available in Bulgaria for actions that invest in children**. NNC, HHC – Bulgaria and the Know-how Centre are aware of EU funding that can be used at national, regional, and local levels to invest in children.

NNC, HHC – Bulgaria and the Know-how Centre stated that the implementation of the **NAP will be financed mainly with funds from the national budget and the European Structural and Investment Funds** (Education Program 2021-2027, Human Resources Development Program 2021-2027, Regional Development Program “ 2021-2027, Program for Food and Basic Material Assistance 2021-2027).

The Bulgarian national budget finances all types of activities related to free healthcare, pre-school and school education,

early childhood care, provision of social services to children and their families, various types of social and family assistance, tax benefits, pensions, and others. On the other hand, European funds, specifically for the purposes of implementing the Child Guarantee in Bulgaria, will finance specifically the education programme, the human resources development programme, the regional development programme, and the programme for food and basic material assistance.

One of the main principles of ESF+ regulation is social dialogue and civil society engagement. NNC, HHC – Bulgaria and the Know-how Centre provide a good practice example of civil society involvement in the monitoring, implementation, and evaluation of EU funds in the national permanent expert group for deinstitutionalisation (PERG), which was established in accordance with the action plan for the implementation of the deinstitutionalisation strategy in Bulgaria. NGOs

participated actively in its activities, including the publication of annual monitoring papers on the progress in the deinstitutionalisation process. However, PERG's work has stopped more than two years ago now, and with the deinstitutionalisation projects being included in the NAP, it is not clear whether or how this group will continue to work.

NNC, HHC – Bulgaria and the Know-how Centre are aware of a number of evaluations and assessments concerning the use of EU funds in Bulgaria, but not of any activities being planned to engage civil society organisations or academic institutions.

There are many NGOs in Bulgaria with good ideas, expertise, and experience on the ground. However, the lack of technical capacity and support to prepare project proposals for EU funding, means that most of them do not apply and funding opportunities are lost.

Projects funded by the EU in Bulgaria

The Know-how Centre has been involved in two EU funded projects. Promoting Foster Care for Unaccompanied Children in Europe (PROFUCE) partnering with five other EU-based organisations in a project for promoting foster care for unaccompanied minors, and Fulfil the Impossible Dreams (FID), a project for improving the professional capacity of specialists working with care-leavers in Bulgaria.

NNC will lead on a new project, which has just been approved for funding. The *National Unified Registry on Violence against Children (NURVAC)* will be implemented in partnership with the State Agency for Child Protection.

Priorities for EU funding in Bulgaria

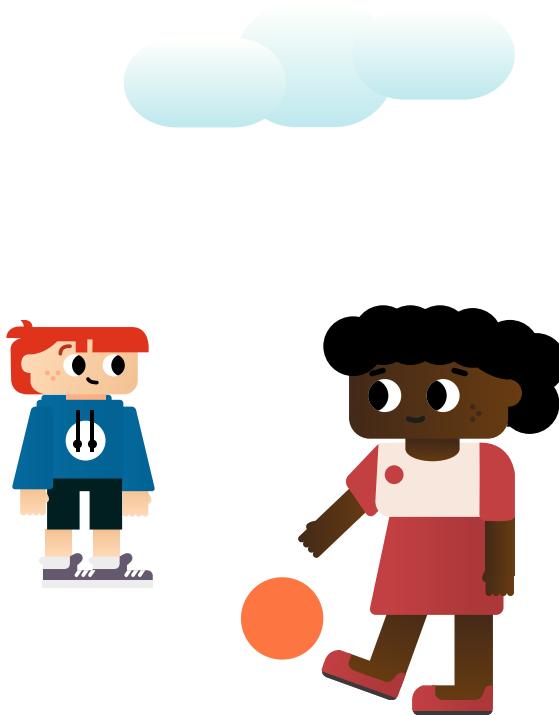
On 28 January 2021, the Council of the European Union and the European Parliament reached an agreement that compels Member States with a level of child poverty above the EU average (23.4% - AROPE 2017 – 2019) to allocate 5% of ESF+ resources to tackle child poverty.⁴ Bulgaria is one of the countries bound by this agreement. The other Member States are asked to allocate an ‘appropriate’ amount of their ESF+ resources to combat child poverty.

NNC, HHC – Bulgaria and the Know-how Centre call on the Bulgarian government to prioritise investments in:

- developing targeted interventions towards preventing the separation of children from their families, including an assessment of their effectiveness and applicability to the Bulgarian context;

- developing and delivering social services for care-leavers;

- targeted investment in **human resources**, especially in the medical field, in social services, and in early child development and care.



⁴ Regulation (EU) 2021/1057 of the European Parliament and of the Council of 24 June 2021 establishing the European Social Fund Plus (ESF+) and repealing Regulation (EU) No 1296/2013.