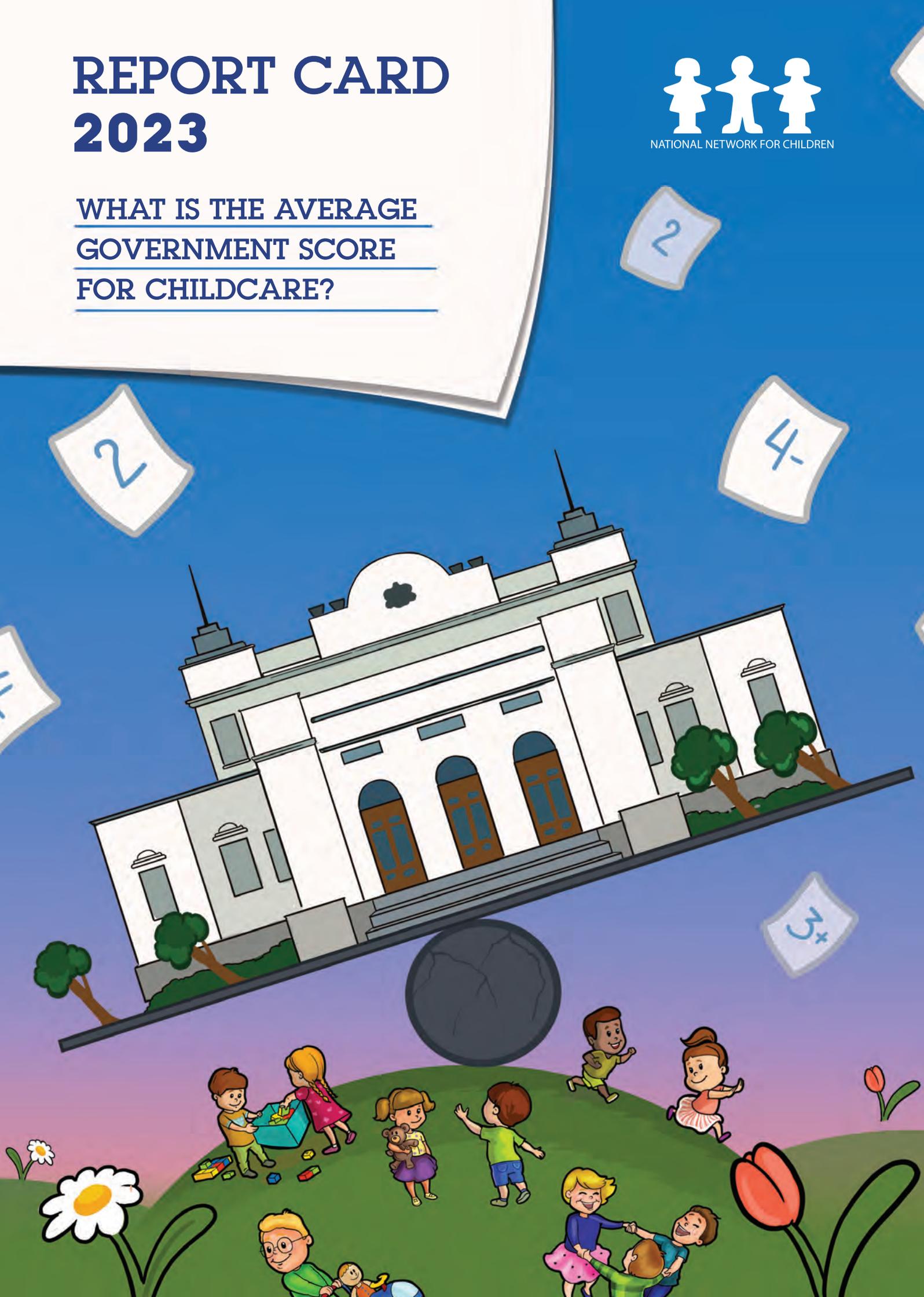


REPORT CARD 2023



NATIONAL NETWORK FOR CHILDREN

WHAT IS THE AVERAGE
GOVERNMENT SCORE
FOR CHILDCARE?



REPORT CARD 2023
WHAT IS THE AVERAGE GOVERNMENT SCORE
FOR CHILDCARE?

Published by:

National Network for Children
May 2023

58 Vitosha Boulevard, 4th floor
1463, Sofia
Phone/Fax: 02 988 82 07, 02 4444 380
office@nmd.bg
www.nmd.bg
facebook.com/nmdbg

Translation: Georgi Elenkov

Cover artist: Neda Malcheva
Infographics, design and pre-press: Taralezh EOOD

ISSN 1314-9970



“We expect children to challenge us, to rebel, to open us to the new. Children are the basis of every society; they should be the center. And we still see in them mostly vulnerability and need for protection. Only when empowered can children become active citizens.”

Velina Todorova,
LexTalks 2022

CHILDREN IN BULGARIA^a



Every third child (33%) is at risk of poverty and social exclusion:



22% households with dependent children



87.3%^b children included in services for early childhood education and care



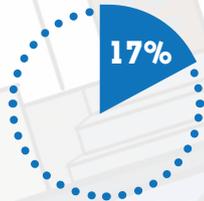
71.7%^c children cared for solely by their parents, up to 3 years of age



709 890^d students



53 464 dropped out of school:



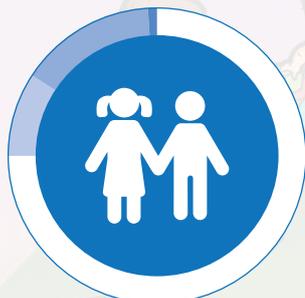
17%^e children living in heavy material and social deprivations



16%^f share of children living in households without internal toilets



3348 unaccompanied children refugees who have filed an application for protection



- **15 262^g** children receiving social services
- **1867^h** children in foster care
- **3022ⁱ** children in residential care
- **97^j** children in educational boarding schools and socio-pedagogical boarding schools



1863 crimes against children

^a The most recent available data was used.

^c Eurostat, 2022

^f Eurostat, 2020

Social Protection (ASP)

ⁱ Information under the Act on Access to Public Information – ASP

^d NSI, 2022/2023

^g Information under the Act on Access to Public Information – Agency for

^h Information under the Act on Access to Public Information – ASP

^b NSI, 2022/2023

^e NSI, EU-SILC, 2021

^j State Agency for Refugees

TABLE OF CONTENTS

| | |
|---|-----------|
| Foreword | 4 |
| Acknowledgements | 5 |
| Methodological Notes | 7 |
| Report Card 2023: Grades | 9 |
| What we can learn from the grades in Report Card 2023 | 10 |
| CHILD PARTICIPATION | 13 |
| 1. CHILD WELFARE | 16 |
| 2. FAMILY ENVIRONMENT AND ALTERNATIVE CARE | 24 |
| 3. PROTECTION OF CHILDREN FROM ALL FORMS OF VIOLENCE | 34 |
| 4. CHILD JUSTICE | 41 |
| 5. EARLY CHILDHOOD DEVELOPMENT | 45 |
| 6. CHILD HEALTH | 51 |
| 7. EDUCATION | 64 |
| 8. SPORTS, RECREATION AND LEISURE | 70 |
| List of Abbreviations | 77 |
| NNC Members in 2022 | 79 |



George Bogdanov,
Executive Director
of the National Network
for Children

FOREWORD

Dear Reader,

In 2022, the unthinkable happened: on the Old Continent, a symbol of democracy, prosperity and good quality of life, war returned in full strength after an almost 80-year hiatus. The hope with which we bid farewell to 2021 – namely to meet the end of the pandemic and to heal our societies from the rifts and losses caused by the latter – was scorched after solely two months by a full-scale military invasion on the territory of the Republic of Ukraine. This full-scale war unleashed unprecedented waves of refugees in modern Europe – mostly mothers and children seeking salvation in the West from the bombings and the destroyed homes and cities. A large part of these refugees reached Bulgaria. Only within the first two months of the conflict, the child population of our country increased by 2%, and with it the urgent need for all the state's systems to work at utterly high speeds in order to provide protection, shelter, health care, education, social assistance and, above all, a sense of safety and support to these women and children, many of whom left their homes to the wail of sirens with nothing but the clothes on their backs.

However, these same systems could not pause care for all remaining children in Bulgaria, nor deviate from their European commitments regarding reforms related to the Recovery and Resilience Plan and the European Child Guarantee.

Whilst world crises stroke one after the other, Bulgaria struggled with its own internal political turbulence, social polarization and uncertainty. In the first half of the year, the country had a regular government, albeit within a broad and unstable coalition, which managed to take consolidated decisions on dealing with the refugee crisis, on post-COVID economic and social recovery, and, to a lesser extent, on sectoral policies. After the government's collapse in June 2022, however, the country once again found itself in a series of elections, ending with the election of the 48th National Assembly, which failed to appoint a cabinet. Governance through caretaker cabinets does not enable the implementation of sustainable policies and completely blurs the responsibility between politicians and institutions, which in 2022 led not merely to missed opportunities and delays, but to critical gaps in ensuring a better life for all children in Bulgaria.

For this reason, a huge part of dealing with the refugee crisis and support for refugee children, along with addressing the unresolved problems of children in general, was left to the civil sector and to volunteers, who found themselves once again in the role of the only corrective to the fluid power in the country. Hardly in the entire modern democratic history of Bulgaria has the advocacy of non-governmental organizations been as necessary and as comprehensive as in 2022. At the same time, nonetheless, the sector continued to be subject to unprecedented attacks of propaganda, disinformation, and hate speech by various radicalized groups, including at the highest political level, who were allowed to thrive within the conveniently created domestic political vacuum and the volatile international environment. Unfortunately, although civil society organizations have done their best to help both refugee children and all other children in Bulgarian, they cannot and should not replace the state in its main duty: to create, through targeted policies, the best possible conditions for parents and families to raise their children in an uncertain future for which we ought to be increasingly prepared.

In this situation, it is perhaps surprising that the twelfth edition of the Report Card receives its highest rating so far: Average 3.33. Despite the plethora of crises, the changed situation in the world and in Bulgaria showed unequivocally that if there is political will, children's topics can become a priority on the agenda, even in an unstable political environment. Evidence of this is the successful movement and voting on behalf of the 47th and 48th National Assembly, within a time window of just a few months, of a number of bills and regulatory changes affecting positively children and families, which had been neglected for years by previous authorities.

If this direction of development is maintained and Bulgaria manages to defend its position as an EU member state, we can be sure that after the rearrangement of the layers, the foundation on which we will build our future shall be firmer.

ACKNOWLEDGEMENTS

The National Network for Children would like to thank all contributors to Report Card 2023: What is the Average Government Score for Childcare.

We are grateful to the authors of the individual parts of the report, to our member organisations – for their support, and to all our colleagues – for their efforts and hard work in commenting on and editing some of its sections.

We cannot fail to thank the young people, parents and professionals who shared their views in two surveys and thus contributed to the texts and grades in Report Card 2023.

We are further grateful to the young members of the Megaphone Youth Network who worked on their chosen topics of Education, Sports and Healthy Eating, so as to integrate their unique vision and ideas in this report.

We especially value the efforts of the officials from the Ministry of Labour and Social Policy, Ministry of Education and Science, Ministry of Health, Ministry of Justice, Ministry of Interior, Ministry of Regional Development and Public Works, Ministry of Culture, Ministry of Youth and Sports, Supreme Prosecutor's Office of Cassation, Agency for Social Assistance, State Agency for Child Protection, State Agency for Refugees, National Centre for Public Health, National Health Insurance Fund, Bulgarian Drug Agency, International Organisation for Migration, National Statistical Institute, National Legal Aid Bureau, regional departments of education, municipalities and regional administrations throughout the country, for providing detailed information on the progress in the fulfilment of commitments and preparing the responses to the numerous applications for access to public information for the report.

We also sincerely thank the office of the Ombudsman of the Republic of Bulgaria, Prof. Diana Kovacheva, for the assistance in supplementing the data and research collected in the course of the annual monitoring of the implementation of the UN Convention on the Rights of the Child and the Optional Protocols to the latter, which enriched the data systematized by the National Network for Children in this report.

We especially like to thank the members of the external evaluation committee, who contributed their time, efforts, and expertise to provide feedback on the report and inputs to the analyses and recommendations.

AUTHORS: Attorney Adelina Hadzhiyska, Member of the Legal Aid Network at NNC
Alexander Milanov, National Association for Foster Care
Anina Chileva, PETRI-Sofia
Antoineta Ivanova, Spina Bifida and Hydrocephalus Association
Antoineta Vasileva, Center for Safe Internet/Parents Association
Boyko Tsenkov and Radostina Belcheva, Council of Refugee Women in Bulgaria
Veselina Tincheva, Karin Dom Foundation – Varna
Galina Bisset, Equilibrium Association – Ruse
Georgi Elenkov, Coordinator of the Legal Aid Network at NNC
Georgi Stoev, Secondary School Lyuben Karavelov, Plovdiv
Assoc. Gergana Geshanova, Smoke-Free Life Coalition
Gergana Efremova, Teach for Bulgaria Foundation
Diliana Dilkova, National Network of Health Mediators
Assoc. Dr. Donka Petrova, Sofia University “St. Kliment Ohridski”
Elmira Nesheva, Center for Humane Policy Foundation
Ivanka Abadzhieva, National Network of Health Mediators
Kristina Nenova, PhD, National Network for Children
Magdalena Tsoneva, Karin Dom Foundation – Varna
Mariana Bancheva, National Association of Resource Teachers
Attn. Mariyana Evtimova, PULS Foundation – Pernik
Maya Tsaneva, Safe Playgrounds Association
Nadezhda Tsekulova, independent expert
Nataliya Alexandrova, For Food Foundation
Natalia Kirilova, Bulgarian Pediatric Association
Plamena Nikolova, National Network for Children
Attn. Teodora Sarkizova, Association Family Centre Maria – Varna
Todorika Georgieva, Bulgarian Association “Adopted and adoptive parents”

Trendafil Meretev, For Our Children Foundation
Tsvete Yaneva, Theatre Tsvete
Attn. Julia Radanova, PhD, Institute for Mediation and Conflict Management

EXTERNAL EVALUATORS:

Assoc. Prof. Velina Todorova, PhD, Vice-Chair, UN Committee on the Rights of the Child
Valentina Tashkova, Community Bridges Association
Eva Zhecheva, PhD, Office of the Ombudsman of the Republic of Bulgaria
Assoc. Prof. Mihail Okoliyski, managing the office of the World Health Organization in Bulgaria
Nadya Shabani, Bulgarian Center for Not-for-Profit Law
Ognyan Isaev, Director of the “Educational Opportunities and Achievements” program, Trust for Social Alternatives
Prof. Tatyana Kotseva, Institute for Population and Human Studies, Bulgarian Academy of Sciences

METHODOLOGICAL NOTES

Report Card 2023: What Is the Average Government Score for Childcare is the twelfth edition of NNC's annual report. It assesses the compliance with children's rights in the implementation of national child and family policies in 2022.

Our main goal for this report is to carry out annual and independent evidence-based monitoring of the work of the government in the field of child rights. The report further provides recommendations, which we hope will support the improvement of child and family policies and practices in Bulgaria.

The subject areas in which the experts analysed the progress in child policies and compliance with children's rights are: Child Participation, Child Welfare, Family Environment and Alternative Care, Protection from All Forms of Violence, Justice for Children, Early Childhood Development, Child Health, Education, and Sports, Recreation and Leisure. Through our choice of subject areas and sub-areas we strive to offer a comprehensive review of child rights in all spheres of their lives. The purpose of the analyses is to ensure cohesion in the presentation of child rights in the report, which focuses on structural and horizontal policies, and not on individual national commitments in the course of the year. In general, we adhere to three prioritisation criteria: significance, relevance to the priorities of our member organisations, and solvability.

We have based our choice of subject areas and sub-areas for Report Card 2023 on the principles of consistency, scope maximisation and topical relevance. This has, on the one hand, given us the chance to dynamically monitor the government's performance in regard to certain challenges and verify whether the actions taken to remedy the identified problems are consistent with the recommendations made in the previous year, and, on the other, it has allowed us to highlight a subject area that is key and exemplary of the state of play of child rights in Bulgaria. Accordingly, as this year's highlight, we have identified governance in crisis – in the context of the political crisis of 2022, and the refugee crisis as a result of the Russian full-scale war in Ukraine. In the analyses, we have examined the readiness of the social protection, healthcare and education systems to cope with oncoming challenges and have shown how systemic problems lead to the collapse of entire structures under the pressure of force majeure changes.

The analyses include assessment, justification and description of facts and data from the desk review done by our experts and the information provided by government institutions in connection with the relevant subject area, as well as recommendations, i.e. concrete steps and possible lines of action.

In the interest of fairness, the preparation of Report Card traditionally relies on facts and data provided by institutions in accordance with the Access to Public Information Act. Aiming for an even more transparent and impartial evaluation, we approached experts from ministries and agencies to solicit their assistance in collecting information on the progress made in the subject areas and sub-areas in 2022, as well as on the challenges faced along the way, and the plans to achieve their goals. We then used this detailed information as the base of the analysis in each subject area. Our other traditional sources include reports prepared by various other institutions, independent researchers and NGOs, and media publications. As the preparatory work for this document took place in 2022 and early 2023, all reported data refer to 2021 and 2022. Where data could not be obtained, we have used the most recent available information on the general state of play and political status quo. All data and information sources are referenced in the report to back up the conclusions and grades in the subject areas, as well as to reaffirm that the analysis is based on reliable sources and not on the subjective opinions of the National Network for Children.

Traditionally, we include the opinions of children, young people, parents and professionals in the report, together with the expert evaluations. By doing so, as in all of the previous editions, we aim to gain important insights into children's rights in Bulgaria based on their own opinions, as well as those of their parents and of the people whose role is to support them, i.e. teachers, health and social workers, amongst others. Without any claim to representation and exhaustiveness, in early 2023, more than 160 children and adults shared facts and opinions about their personal experiences in the fields of healthcare, education, justice and family matters by taking part in the survey "Report Card: How Children, Parents and Professionals Evaluate the Government".

Our task has been to examine the current situation and identify the possible changes connected with ensuring compliance with child rights and child and family policies, as evidenced by the decision making and relevant implementation actions taken by the government towards a permanent elimination of the problem, and towards ensuring a positive impact for children and families. We have also remembered to duly praise all efforts and positive developments, even in the absence of concrete results or incomplete policy implementation. We have made a conscious effort to highlight achievements and look for positive developments in the area of child rights, without, however, sparing constructive criticism where such is due.

The section “What We Can Learn from the Grades” hereinbelow includes an overview of the developments in each subject area made in the past year. Scoring in the report is equivalent to the one used in the Bulgarian educational system, and is based on a scale of two to six. The assessments were originally made by our experts and external evaluators, along with the children, parents and professionals, and were then verified by the civil organisations participating in the National Network for Children. The final grades are based on the arithmetic averages of the grades given by the authors and external evaluators and the children, parents and professionals in each sub-area under the eight subject areas covered by the report. It is important to note that we have once more utilized the grading scale adopted in 2015. This means that each grade is based on a definition of the problem, i.e. considering the state of play at national level as regards compliance with child rights and child and family policies, as well as the decision-making and the relevant implementation actions taken by the government towards a permanent elimination of the problem and ensuring a positive impact for children and families.

How Children

Key:



Parents' and professionals' opinions obtained through a questionnaire titled *How Children, Parents and Professionals Evaluate the Government*.

REPORT CARD 2023: GRADES

The grading scale for the topics covered in the report is from 2 to 6, with grading guidelines and a “half unit” included to more clearly define progress and capture details.

The assessment is carried out according to detailed guidelines for assessment through defining the respective issues – from examining the situation in the country with the guarantee of child rights and policies aimed at them and at

families, through decisions taken by the state to solve the problem, the implementation of these decisions, to the permanent elimination of each issue and the positive impact on children and families.

The scale is also duly synchronized with the survey “Report Card – How do Children, Parents and Professionals Evaluate the State?”

| SUBJECT AREAS | AVERAGE GRADE, PREVIOUS REPORTS | | | | | | | | | | | |
|--|---------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| | 2023 | 2022 | 2021 | 2020 | 2019 | 2018 | 2017 | 2016 | 2015 | 2014 | 2013 | 2012 |
| Child participation | 3.11 | 3.08 | 3.06 | 3.00 | 3.50 | 2.83* | | | | | | |
| 1. Child welfare | 3.57 | 3.04 | 3.19 | 2.50 | 3.00 | 2.60 | 2.86 | 2.91 | 3.06 | 2.97 | 2.71 | 2.88 |
| 2. Family Environment and Alternative Care | 3.13 | 3.09 | 3.12 | 3.00 | 3.50 | 2.53 | 3.01 | 3.02 | 2.61 | 2.98 | 2.93 | 3.14 |
| 3. Protection of children from all forms of violence | 3.33 | 3.07 | 2.50 | 2.50 | 3.00 | 2.83* | | | | | | |
| 4. Justice for children | 3.52 | 3.28 | 3.10 | 3.00 | 2.50 | 2.79 | 3.05 | 3.45 | 3.30 | 2.90 | 3.44 | 3.56 |
| 5. Early childhood development | 3.48 | 3.32 | 3.22 | 3.00 | 3.50 | 2.33* | | | | | | |
| 6. Child health | 2.98 | 3.17 | 3.09 | 3.00 | 3.50 | 3.19 | 3.64 | 3.58 | 3.31 | 3.21 | 2.38 | 2.79 |
| 7. Education | 3.40 | 3.65 | 3.71 | 4.00 | 4.00 | 3.02 | 3.44 | 3.45 | 3.62 | 3.11 | 3.00 | 2.68 |
| 8. Sports, recreation and leisure | 3.42 | 2.98 | 2.75 | | | | | | | | | |
| AVERAGE GRADE FOR REPORT CARD 2023 | 3.33 | 3.18 | 3.09 | 3.00 | 3.31 | 2.88 | 3.20 | 3.28 | 3.20 | 3.00 | 2.90 | 3.00 |

*Note: These grades are derived from the subjects of Report Card 2018 as separate sub-subjects.

WHAT WE CAN LEARN FROM THE GRADES

CHILD PARTICIPATION

Grade: 3.11

In the past year, the state made no effort to „translate“ the concept of child participation to understandable language, and to adapt to child-friendly language certain key documents and policies affecting child rights and welfare. According to the children, the main challenges to authentic child participation are related to belittling their positions on the part of adults, lack of understanding of their rights, ignorance of mechanisms and good practices for making child participation safe, inclusive, empowering and sustainable. The needs of children and young people for free expression and respect for their opinion on topics directly and indirectly affecting them are hardly and variously recognized. Pilot initiatives aimed at teaching children about rights and civic education have limited scope and effect. The principles of the UN Convention on the Rights of the Child are not recognized as tools for civic education even by a large part of the specialists working directly with children.

1. CHILD WELFARE

Grade: 3.57

Bulgaria is one of the countries where social transfers still have a limited impact on reducing poverty and inequality, as the risk of poverty after social transfers remains above the EU average. Progress through 2022 is the adjustment and increase of a number of social payments, benefits, and supplements for families with children. Positive steps aimed at assisting families with children are the abolition of fees for kindergartens and nurseries for all children in the country, the increase in the amount of the benefit for raising children in the second year of maternity, and the increase in tax benefits for working parents. Targeted social work and integrated support for the poorest and most marginalized families and children remain a challenge. Due to the refugee crisis, it became clear that the state has an utterly limited capacity to respond to crisis situations in which different sectors ought to act in a coordinated manner, find common quick and non-standard solutions to urgent problems, and multiply their work capacity. As a result, a huge part of refugee children did not receive adequate access to health care, education, social and other services.

2. FAMILY ENVIRONMENT AND ALTERNATIVE CARE

Grade: 3.13

The systems of education, welfare and protection continued to fail to integrate effective models of parental involvement and impact. The frequent change of governments threatened once again the adequate functioning of foster care as the next necessary step in the deinstitutionalization process in Bulgaria. This process was blocked by the ongoing maintenance of the last four large institutions for children of the old type, which remained unclosed in 2022. At the same time, a huge problem continues to be the fact that almost every fifth foster family has not accepted any children. The increasing trend in the number of terminated adoptions and the return of children to residential care continued in 2022. There is lack of support for prospective adoptive parents, as well as no assessment of the change in the attitudes and motivation of future parents, which ought to be the foundation of any successful adoption. The protection and integration mechanisms for the unaccompanied refugee children continue to be torn between the protection system, the social system, and the refugee status, without being sufficiently supportive and without securing good prospects for individual development of refugee children.

3. PROTECTION OF CHILDREN FROM ALL FORMS OF VIOLENCE

Grade: 3.33

The problem of the lack of a unified system for registering cases of violence against children continued to exist in 2022, although there were indications that the establishment of a unified system will commence next year and thus the data will be analyzed thoroughly and become the basis of adequate prevention and response policies. The cases of violence in schools against and between children continue to grow, while only the more severe and serious ones fall into the list of the Ministry of Education and in the public space. The trend towards an increase in the number of psychologists and pedagogic counselors employed in schools and kindergartens is positive, yet cooperation is still needed between more systems, along with support through various services to the school and parents, so that the most serious cases could be solved. Two of the mechanisms for supporting children who are victims of violence – the National Children’s Telephone Line and the Safer Internet Center suffered unwanted and unwarranted transformations in 2022 that threatened and worsened their functioning, and resp. the support for children, parents, and professionals. The National Telephone Line’s maintenance was transferred from the State Agency for Child Protection to the Agency for Social Assistance, where the quality has deteriorated significantly due to utter lack of the necessary expertise among the officials who manage it, incl. the lack of qualification to provide psychological support for the children calling. The Safer Internet Center (SIC), which until now fulfilled the state’s commitments in the field of Internet security, albeit without state funding, was threatened with closure due to exhaustion of project funding. As of the end of 2022, there is still no sustainable solution for SIC’s financing.

4. JUSTICE FOR CHILDREN

Grade: 3.52

The evaluation topic of Justice for Children received a higher rating than in previous years due to development on various topics, which until then had remained on the periphery of law-making. Through the bill for the amendment of the Penal Procedural Code, submitted by the Ministry of Justice to the National Assembly in October 2022 (<https://parliament.bg/bg/bills/ID/164366>), steps were taken for the full transposition of Directive 2012/29/EU for the establishment of minimum standards for the rights, support and protection of crime victims. Approved by the Council of Ministers and submitted to the National Assembly was also the bill for the amendment of the Act on Protection from Domestic Violence, providing for a significant improvement of the Bulgarian system of prevention and protection from domestic violence. Further, the Supreme Judicial Court’s special programme for piloting the so-called mandatory mediation in some family disputes commenced in 2022. At the same time, the Council of Ministers approved 2 draft laws (for amendments in the Civil Procedural Code and the Act on Mediation), through which for the first time the introduction of mandatory first meetings with a mediator in family disputes was envisaged.

5. EARLY CHILDHOOD DEVELOPMENT

Grade: 3.48

2022 saw heightened political interest and focus on several areas concerning early childhood development. In the middle of the year, regulatory amendments were adopted with the aim to improve access to pregnancy tracking for uninsured mothers, yet due to the ongoing political crisis and the lack of a state budget, it is not clear how these new regulations will be put into practice. In the field of early learning, in 2022, a proposal was drafted for a National Quality Framework of Early Childhood Education and Care Services. At the end of the year, a bill was rejected, which provided for the joint maintenance of nurseries and kindergartens on behalf of the Ministry of Education and Science. The main remaining problems encompass the lack of adequate, diverse and accessible services to support responsible parenting and improve the quality of childcare, as well as the lack of universal screening for all children in certain age groups, with the goal of referral to early intervention services when developmental delays and disabilities have been identified.

6. CHILD HEALTH

Grade: 2.98

State policies do not place a clear enough focus on child health, which is evident in the lack of any adopted National Pediatric Strategy covering all aspects of pediatric care in Bulgaria. There is no regional specialization of health policies at all, so as for regional issues regarding the access to health care, child mortality and the vulnerability of certain groups to be addressed. Health services for rare and chronic diseases are highly centralized in the capital and several larger cities. There are many children throughout the country who receive health care solely when their health is seriously worsened. In 2022, no comprehensive analysis of the needs of child healthcare was prepared, on which to base the efforts of building a National Pediatric Hospital, although its creation was enshrined in the regular government's coalition agreement.

7. EDUCATION

Grade: 3.40

The educational system in Bulgaria still lacks a comprehensive and unified vision for what quality education, quality teaching, quality management and quality assessment mean in practice. Accordingly, the role, mechanisms and specific instruments of the Ministry of Education and Science, the National Inspectorate of Education and the Regional Directorates of Education have not been defined and agreed upon. The sector leaves the impression that there is money for education, but it is not spent appropriately and does not contribute to efficiency, sustainability and return on investment. The student achievement gap is critically widening and has not been addressed in any meaningful way. Key policies such as inclusive education and desegregation, as well as ensuring that all children have access to quality education, remain funded through isolated projects and programmes rather than as part of the Ministry of Education's budget, and their sustainability is thus constantly threatened. There is a glaring need to update the professional profiles of management positions in the educational institutions and to incorporate within them key competences of the XXI century, with a clear focus on leadership skills in the process of selection of principals. The Ministry of Education finances a number of trainings and programmes to improve the qualifications of teachers, yet their effectiveness remains unclear, since there are no robust indicators for tracking their quality and practical effects. Last year, a process of modernizing the curricula was commenced, in which, however, not all relevant stakeholders were involved and which did not lead to any substantial reforms or to the extension of schools' autonomy in terms of the choice of programmes and of teaching methodologies. There is also no update of programmes and methodologies in the field of preschool education.

8. SPORTS, RECREATION AND LEISURE

Grade: 3.42

The main access of children in Bulgaria to sports is directly related to the socio-economic limitations of their parents, the town where they live in and, to a rather small extent, the school they attend. Mass sports for children is chronically underfunded and left to the financial resources and choices of the family. Although the Ministry of Youth and Sports finances sports activities under a number of national programmes, their coverage remains limited due to massive amortization or missing sports facilities outside the country's largest cities. Child sports should be part not only of national but also of municipal targeted policies. We ought to note the joint efforts in 2022 on behalf of two ministries – the Ministry of Culture and the Ministry of Education and Science – aimed at expanding opportunities for children and students to participate in activities related to arts and culture, including conducting classes in different environments such as museums, galleries, libraries, etc. At the same time, the selection of goals and activities of the national programmes supplementing the basic educational horary is increasingly shifting solely to Bulgarian historical heritage, with less focus on other cultural contexts and neglect of alternative art forms.



CHILD PARTICIPATION

CHILD PARTICIPATION

AVERAGE 3.11

- lack of a shared vision of the nature and importance of child participation at the national level;
- lack of understanding among professionals working with children and institutions regarding the need for child participation at all levels.



„Please listen to our opinion, after all, we are going to learn things that will be useful to us in life, not useless things.“

Child Survey, 2023



„The state should look for ways in the consultation processes with children to include more children of Roma origin, from segregated schools and isolated areas throughout the country, as well as children who are separated from their families.“

Survey, Report Card 2023

The responsibilities and priorities related to authentic child participation in Bulgaria continue to be unshared and uneven between relevant authorities, the non-governmental sector, the media, and citizens in 2022. The state does not honor its commitments to support child participation, and has not taken measures to ensure effective and active participation of children at the local and national level.

Despite the ratification of the Convention on the Rights of the Child in our country back in 1991, it is still not studied sustainably in Bulgarian schools, and is mentioned solely in limited classes on civic education in the last two high school years (11th and 12th grade). Familiarizing students with the Convention's principles and child rights remains a priority of non-formal education, mostly supported by non-governmental and civil structures.

The National Network for Children and UNICEF Bulgaria are among the leading organizations educating students and youth in the context of the Convention and the UN global goals for sustainable development, through the youth programme „Megaphone“, the annual initiative „The Biggest Lesson in the World“, the annual youth conference „Voicelt“, aiming to motivate the young generation to make more and clearer commitments to the future development of their environment.

A procedure for electing members of the Children's Council to the SACP was also held in 18 regions of the country – 33 new representatives were elected, two of them from the quota of children from vulnerable groups and one representative of children who have received international protection in Bulgaria. At a meeting of the Council in the

city of Plovdiv with Associate Professor Manol Manolov, advisor to the former Minister of Education and Science Nikolay Denkov, the role of student councils and greater participation of children in all processes that concern them were discussed.

The „Teach for Bulgaria“ („Заедно в час“) Foundation remains in 2022 the main driver of innovation in the context of placing the student at the center of the educational process and addressing the critical needs of every child in the classroom. By expanding the scope of its Exemplary Schools Programme over the past year, this non-governmental organization strives to sustainably integrate the programme's goals with the training courses recognized by the Ministry of Education and Science, through which educators increase their qualifications and skills for working in the field of child participation. In its annual report, „Teach for Bulgaria“ continues to insist on the need for a new algorithm for the selection of teaching staff, which should focus on the skills and attitudes of teachers to democratize Bulgarian education and to empower students more effectively. This key component of the practical implementation of the competence model of learning has been theoretically laid down by the Ministry of Education and Science itself through the amendments to the Act on School and Pre-school Education of 2016, and with resources that have been published on the Ministry's website in 2019.

In the past year, the challenge for children to have access to adapted child versions of basic documents and policies affecting their rights remains relevant.



In the children's opinion, the main challenges are related to belittling of their positions on behalf of adults, to the lack of understanding of their rights, and the ignorance of mechanisms for making child participation safe, inclusive, empowering and sustainable.

The cited results, announced in December 2022, are from the mapping of child participation and activism in Bulgaria carried out by the Know-How Center for Alternative Care for Children at the New Bulgarian University (NBU) under the pilot project "Present and Future: Push for the Empowerment of Child Human Rights Defenders in Bulgaria", in partnership with Child Rights Connect and the NNC. As a partner of state authorities in the development of an effective strategy for deinstitutionalization and the development of family care, through this Project, the Center aims to strengthen the empowerment of children in

Bulgaria in a way that motivates more children to become human rights defenders, a priority in the context of children from vulnerable groups. Amongst the year's distinct activities on behalf of the state, rendering a serious boost to opportunities for more targeted child empowerment, stands the June 2022 work meeting of Iceland's Ombudswoman for Children, Ms. Salvjör Nordahl, with Bulgarian state institutions. During her meeting with the Ombudswoman of the Republic of Bulgaria, Prof. Diana Kovacheva, with representatives from the Committee on Labor, Social and Demographic Policy and from the Committee on Children, Youth and Sports in the 47th National Assembly, with the Minister of Education and Science Mr. Nikolay Denkov and the Deputy Minister of Justice Mr. Borislav Ganchev, Ms. Nordahl brought out key points from Iceland's experience with advocacy policies on how to systematically and purposefully place children on the agenda of Bulgarian authorities. The main topic of the talks with the state institutions was the potential of Bulgaria to establish its own institution of Ombudperson for Children. Iceland took over the presidency of the Council of Europe in November 2022, and one of the key topics on its agenda is related to child rights.

RECOMMENDATIONS

- The State should continue efforts to create a clear and shared definition of the meaning of authentic child participation, based on the Convention on the Rights of the Child, and to popularize its basic principles;
- Create working mechanisms for actual child and youth participation, incl. for how institutions to gather and incorporate in their work feedback and proposals rendered by children;
- Address the polarized public attitudes in the context of the draft National Strategy for the Child 2019-2030 through a targeted information campaign;
- Create clear criteria at the national level for the selection of new personnel in preschool and school education, incl. knowledge, skills and attitudes related to child and youth participation;
- Provide training for pedagogical specialists on the nature and meaning of child and youth participation;
- Develop criteria and standards for child participation and forms for evaluating whether and how it is applied by pedagogical specialists;
- Continue strengthening communication between institutions and the non-governmental sector for the exchange of data, information and ideas for the sustainable development of policies related to child rights and their implementation and protection in order to sustainably solve the challenges of child participation;
- The state should make a clear commitment to present institutional decisions and documents directly affecting children in a more accessible and understandable language for them, e.g. The Strategy for the Child, the Strategy for the Youth, the Strategic Framework for the Development of Education, Training and Learning, etc.;
- The state should purposefully support existing and future structures through which children can express opinions on documents, policies, programs that affect them, and a mechanism for taking into account the opinions of children – such as the newly created National Student Parliament, student councils, and other structures at local and municipal level;
- Systematize good practices of child participation, and render them available to all relevant authorities;
- Develop different game models of child participation, suitable for different age groups, and popularize existing ones more widely;
- Establish an institution of Ombudperson for Children in Bulgaria with a structure for direct child participation in it.



1.
CHILD WELFARE

CHILD WELFARE

GOOD 3.57

- lack of a comprehensive policy to eradicate child and generational poverty;
- lack of a comprehensive policy and vision for increasing the well-being and improving the lives of children;
- lack of a network of effective services to support children and families according to their individual needs through a cross-sectoral approach.



“Single parents should receive more benefits, and mothers and fathers should be encouraged to have children. The state must be able to support the needs of families.”

Child Survey, 2023



“The state should openly admit that there is a huge problem with child poverty, which cannot be solved only through attending kindergarten and school (initiatives and activities in the educational sphere), although this is extremely important, of course. The state should also look for solutions related to the living conditions in ghettos and in villages, to housing policies, labor market, specialized support for families in crisis, etc.”

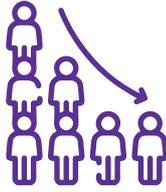
Survey, Report Card 2023

Demographics

As of September 7, 2021, the population of Bulgaria is 6,519,789 people. In the period between the last two censuses, the country's population has decreased by 844,781 people, or by 11.5%. The population decrease as a result of negative natural growth is -501 thousand, or 59.3% of the total decrease. An exceptionally high negative growth was recorded in 2020-21 due to the record excess mortality during the COVID-19 pandemic. Natural population growth for all years between the 2011 and 2021 censuses is negative, with the largest decline in population in 2021 (by 90,317 people). The remaining 40.7% of the decrease is due to external migration or the number of people who left the country in the period 2011-2021 (344,000 people). The negative trends in the change in the age structure of the population and an ongoing process of demographic aging continue to deepen, which is expressed in an increase in the absolute number and relative share of the population aged 65 and over. As of September 7, 2021, the population aged 65 and over is 1,532,667 people, or 23.5% of the country's population. The general age dependency ratio



continues to increase, and in 2021, for every 100 persons within the 15-64 age group, there will be 60 persons under 15 and over 65 years of age.



- 90,317 people
record population decline in 2021

Population in the age group 0-14 years



975,000 → **918,000**
 2011 2021

Since 1992, the child population under the age of 14 in Bulgaria has decreased by over 40%. In 2021, children live in just over 22% of all households in our country. Just under 2/3 of households with children are one-child households; 32% of households have two children; and only 5.11% have three or more children. The number of live births decreases, whilst the total birth rate remains unchanged; the number of deceased persons and the total mortality rate are increasing. The average age of mothers at the birth of their first child increased from 26.3 years in 2011 to 27.5 years, although the fertility rate increased slightly – from 1.51 in 2011 to 1.58 in 2021. The issue of replacing the working-age population is becoming increasingly relevant – the demographic replacement rate shows that every 100 people leaving the working age (60-64 years) are replaced by 61 young people entering the working age (70 in 2011 and 124 in 2001).

A key obstacle to the planning and implementation of child welfare and family support policies is the lack of

an accountable institution and/or structure in both the legislative and executive branches. Currently, the State Agency for Child Protection is more symbolic than functional, and the Parliamentary Committee on Children, Youth and Sports deals predominantly with sports policies and is colloquially referred to as the “Sports Committee”.

The lack of coordinated policies for child welfare and family support is even more visible in the context of the fact that for four years now our country remains without an adopted National Strategy for Children (2019-2030), after its withdrawal in 2019. This leaves policies for children and families without common goals and coordination, which is why the National Network for Children, through the international coalition Eurochild, initiated a class action against Bulgaria before the European Committee of Social Rights (Eurochild v. Bulgaria – № 221/2023). During the ongoing first phase of the proceedings, the Bulgarian state presented no justification for the dismissal of the claim.

Demographic data, 2021 (NSI data)



Births

59,069 Total for the country
30,273 boys
28,796 girls

58,678
 Live births



Birth rate

8.5 Total for the country
8.7 City
8.1 Village



Total fertility rate

| | | |
|--------------------------------------|---------------------|------------------------|
| 1.58 Total for the country | 1.49 City | 1.80 Village |
|--------------------------------------|---------------------|------------------------|



Natural increase per 1000 people of the population

| | | |
|---------------------|---------------------|----------------------|
| -6.7 2019 | -9.5 2020 | -13.2 2021 |
|---------------------|---------------------|----------------------|

Total for the country

| | | |
|---------------------------------------|----------------------|-------------------------|
| -13.2 Total for the country | -10.5 City | -20.2 Village |
|---------------------------------------|----------------------|-------------------------|

Total for the country – population up to 19 years.

| 0 | 1–4 | 5–9 | 10–14 | 15–19 | Total |
|---------------|----------------|----------------|----------------|----------------|------------------|
| 58 593 | 249 781 | 334 968 | 349 723 | 319 108 | 1 312 818 |

Child poverty and social exclusion

Bulgaria consistently holds one of the first places in terms of levels of risk of poverty and social exclusion for children. Research clearly shows the long-term consequences of child poverty—children from low-income households have poorer cognitive, behavioral, and health outcomes. In 2021, every third child in Bulgaria lives at risk of poverty and social exclusion (33% against 21.7% average levels for the EU-27).

Although in 2021 there is a decrease in the share of children living at risk of poverty (24.2% against 28.3% in 2021), it is essential that, firstly, the share of children living at risk of poverty before social transfers increases compared to 2020, and, secondly, that it does not mark a significant change from 2016. With base levels of 43.5% in 2016, in 2021 it is 41.9%, which poses a significant question regarding the effectiveness of social assistance as the main tool for reducing child poverty. Bulgaria remains one of the countries where social transfers still have a rather limited impact on reducing poverty and inequality, and the risk of poverty after social transfers is above the EU average.

Households with three or more children are 1.2% of all households in our country; although nearly 20% of children in Bulgaria are raised in them, traditionally they are among the households with the highest risk of poverty and social exclusion. In 2021, there was a slight decrease in the risk of poverty for households with two adults with three or more children – by 0.8, reaching 48.5%, and with single parents with children – by 0.8, reaching 34.9%.

National targets for reducing poverty and social exclusion by 2030

Pursuant to the Action Plan for the implementation of the European Pillar of Social Rights, Bulgaria has set a national goal to reduce the number of persons at risk of poverty or social exclusion in the country by 787,000 people by 2030.



With the implementation of this goal, it is expected in 2030 the share of the population at risk of poverty or social exclusion shall be 23.6% compared to 33.2% in the base year 2019, which will represent a decrease of 9.6.

In line with the relevant European target, which places a special focus on reducing child poverty, a specific sub-target referring to children at risk of poverty or social exclusion is formulated as an addendum to the national target, namely: „To reduce the number of children under 18 at risk of poverty or social exclusion by 196,750 persons” (25% of the total national target).

Risk of poverty in 2021



48,5%

in households of two adults with three or more children

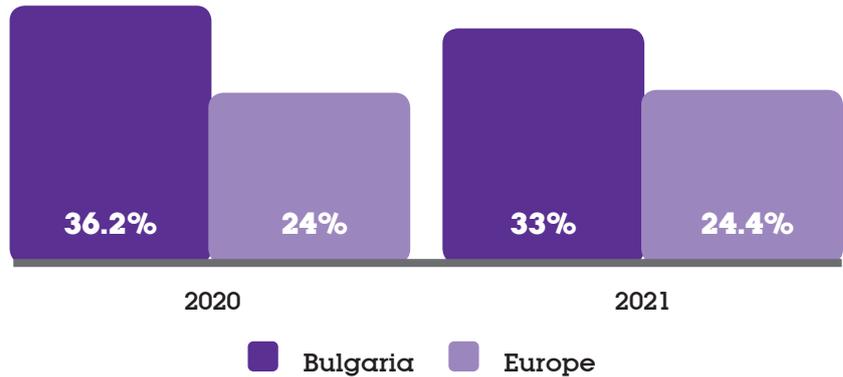


34,9%

single-member families with children

Risk of poverty and social exclusion compared to the EU average

Children under 18 at risk of poverty and social exclusion



Child poverty according to 13 indicators (6 at the individual level and 7 at the household level), 2021

Percentage of the population living in severe material and social deprivation



20%

of children aged 0-17 years live in deprivation by 7 indicators



36%

Relative share of children with material deprivation (deprived of at least one of 13 indicators)



2.5%

Relative share of children whose needs cannot be met due to financial reasons



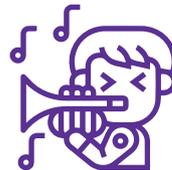
28%

Share of children who cannot afford at least one holiday outside the home week a year (including holidays with family, visiting relatives, friends, organized break from school, etc.)



26.7%

Share of children who cannot afford outdoor equipment (bike, roller skates, etc.)



23.2%

Share of children who cannot afford regular swimming lessons, playing a musical instrument, participating in youth organizations, etc



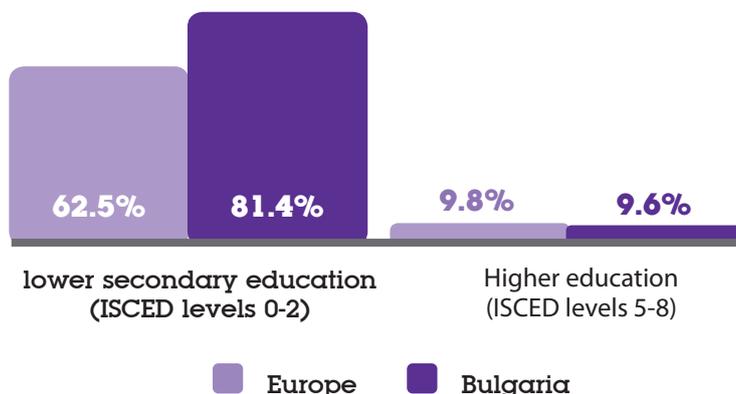
37.6%

of children in material deprivation also live at risk of poverty.



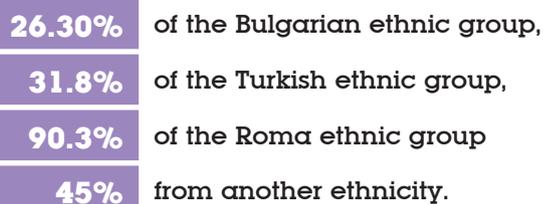
By parents' level of education

Share of children under 18 at risk of poverty or social exclusion, **analyzed according to the highest level of education achieved by their parents, 2021.**

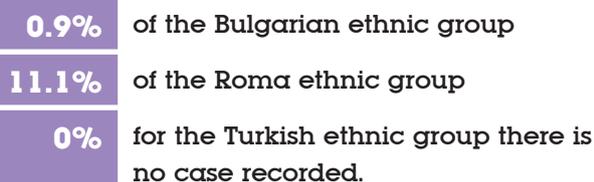


By ethnicity

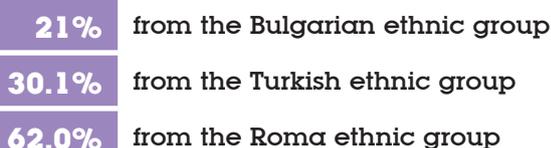
In 2021, the relative share of materially deprived children (deprived of at least one of 13 indicators) is, as follows:



None of the children's needs (limits for all 13 indicators) can be provided for:

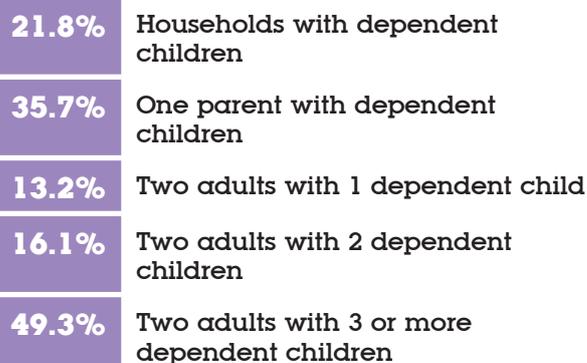


Children with material deprivation living at risk of poverty:



By family size/dependent children

Share of the population at risk of poverty or social exclusion, analyzed by household type, EU, 2021. For Bulgaria



18.9%

of children do not have two pairs of shoes that fit their size and are suitable for the season, and for Roma children the share reaches

48.7%

Benefits for families with children

In 2022, some positive developments can be noted in terms of social payments, benefits, reliefs and supplements for families with children. Higher tax relief for children and disabled children was applied to income earned in 2022, a measure with a direct impact on working parents. The amount of the relief for children for 2022 depends on their number; for one minor child it is BGN 6,000 (amount to be received up to BGN 600, when income taxed at 10% tax was received during the year), for two children – BGN 12,000 (amount to be received up to BGN 1,200), and for three and more – BGN 18,000 (amount to be received up to BGN 1,800). The amount of the tax relief for children with disabilities is BGN 12,000 (amount to be received up to BGN 1,200).

With regard to benefits, a differentiation has been introduced in the income criterion for receiving monthly benefits for raising a child until the completion of secondary education. Along with this, the income criterion for the one-time pregnancy allowance and the monthly allowance for raising a child up to one year has been increased.

Further, the adopted in 2022 two-month paid paternity leave, which is due until the child reaches the age of 8, can be noted as a positive development.

Parents share that during the initial examination, even when there is full compliance with all established requirements and deadlines pursuant to Art. 8e, para. 8, the monthly allowances payable for the period before the submission of the application until the date of disability, included in the expert decision of the relevant expert committee (not more than one year prior), solely 50 % of the allowance are paid, determined in accordance with Art. 8e, para. 3 for the respective year. This creates extreme difficulties for families of children with disabilities who cannot meet their needs and provide the necessary quality of childcare.

In 2022, despite the almost complete abolition of anti-epidemic measures as of April, the payment of monthly targeted aid in the event of a declared state of emergency or a declared emergency epidemic situation for families with children up to 14 years of age continued, pursuant to Decree of the Council of Ministers No. 218 of 17.08.2020 for the amendment of the Regulations for the Implementation of the Social Assistance Act (No. 77 of 01.09.2020) – for parents who lose their income due to the need to stay at home with the children.

| Number of working days per month during which children do not attend nurseries and kindergartens and participate in distance education | For a family with one child | For a family with two or more children |
|--|---|--|
| Over 10 | BGN 650 (until April 1, 2022) BGN 710 (after 01.04.2022) (one minimum wage) | BGN 975 (until April 1, 2022) BGN 1,065 (after 01.04.2022) (150 percent of the minimum wage) |
| From 6 to 10 | 50% of the full size | 50% of the full size |
| Up to 5 | 25% of the full size | 25% of the full size |

As far as the aid for Ukrainian refugees is concerned, there is a persistent trend of numerous administrative and bureaucratic obstacles that hinder the actual receipt of financial support, although it exists normatively to some degree. Difficulties faced by refugees in terms of overcoming administrative obstacles for the issuance of various documents related to access to education, health and social services continue a year after the beginning of the refugee crisis. The lack of a regular governance makes it rather difficult to address these issues and leaves support almost entirely in the hands of volunteers and the non-governmental sector.

European Child Guarantee

In the context of the unadopted National Strategy for Children (2019-2030), UNICEF Bulgaria reports, with its 2022 report – “Unequal Childhood – Comprehensive Analysis of Child Poverty and Social Exclusion in Bulgaria”, a lack of targeted actions on behalf of the state aimed at promoting the social inclusion of children, so that the set goals and mea-

asures lead to the reduction of child poverty and are implemented in synchronicity with the Convention on the Rights of the Child.

In connection with the state’s efforts for a more sustainable social inclusion of children, it ought to be noted that in the last year and a half we have observed some development in the implementation of the European Child Guarantee (ECG – 2030) – an initiative of the European Commission, which aims to provide the most vulnerable children in the EU with access to health care, education, childcare, acceptable housing and adequate nutrition. The measures stipulated in the Action Plan in Implementation of the European Child Guarantee, adopted by the regular government, cover nearly 200,000 children from vulnerable groups. The plan aims to reduce the number of children at risk of poverty or social exclusion by 196,750 persons by 2030, with the state taking the main part of the financing of the activities. The first operation to implement the Plan – “Future for Children”, under the Human Resources Development Program (2021-2027), was launched in November 2022.

Early care services in support of parents



From April 1, 2022, amendments to the budget voted the previous year came into force, which led to the abolition of fees for kindergartens and nurseries for all children in the country.

This necessary measure, especially for children from vulnerable groups, gives the opportunity to improve municipal policies for the coverage of children in early and pre-school age, and to achieve the European recommendations for investments in the earliest childhood, which has been proven to be the necessary basis for the development of the full potential of every child.

The amount of the allowance for raising a child in the second year of motherhood was increased **from BGN 650 to BGN 710 as of April 1**. Thus, for some of the economically underserved regions and communities of the country, it turns out to be more profitable for mothers to remain in maternity until the child is 2 years old than to return to work, especially in cases where the specific municipality does not offer a sufficient number of / any whatsoever quality early care services.

In order to ensure a better work-life balance for parents with young children, an amendment in the Social Security Code was adopted in 2022 regulating the request of flexible working hours on behalf of parents with children up to 8 years of age. It is necessary to track how many parents use this opportunity and what the employers' practices are. Along with this, there are opportunities to pay babysitters when returning to work after maternity within the framework of the „Parents in Employment“ Project, financed under the Human Resources Development Operational Program (2014-2020). In 2021, 2,289 unemployed/inactive persons are included in employment as childminders, and 2,289 parents are supported. In 2022, 42 unemployed/inactive persons are included in employment as childminders and 42 parents are supported. As evidenced by the results in the second year, the program is resource-constrained and cannot effectively meet the needs of all parents. Although a step in the right direction, it needs further flexibility and rethinking to cover more families and children.

Two topics remain without any development in 2022 – the housing policy strategy, especially for the most vulnerable children living in severe material deprivation, which is not recognized as a priority either at national or municipal level, and the problems of people without personal documents – nearly 200,000 citizens, for whom access to a number of services, social payments, education, health care, is practically cut off. This directly affects the well-being of their children.

RECOMMENDATIONS

- Update and adopt the National Strategy for Children (2019 – 2030) as a unified plan to ensure the well-being of all children and the support to all families in Bulgaria, as a first step in dealing with the deteriorating demographic indicators;
- Through restructuring, a permanent Parliamentary Commission for Children, Youth and Families should be established to review the legislative framework and policies related to children and families in their entirety;
- Guarantee the operational independence of the State Agency for Child Protection or establish a new body with real mandate to coordinate policies for children and families in Bulgaria;
- Introduce an assessment of financial investments in children in the process of development of the state budget, which tracks the effectiveness of public spending in the healthcare, educational and social system, with view of how strategic goals in the policies for children and families are reached;
- Link social assistance measures with social support and employment measures to achieve effectiveness in the fight against child poverty and social exclusion;
- Bulgaria should begin to effectively implement the measures set out in the National Plan for the European Child Guarantee, so as to assure the access of children

at risk to a set of key services, incl. by strengthening the cross-sectoral and inter-institutional approach in the implementation of policies;

- As part of plans to implement the National Poverty Reduction Strategy, direct resources and efforts to identify and support the most vulnerable groups among children, such as those whose parents have little or no education, children raised by a single parent or in large families, and those who belong to marginalized groups of the population;
- Set and implement irrevocably high goals for the complete eradication of the most extreme forms of poverty and marginalization among children;
- Comprehensively reform the system of social assistance and support for families with children, introducing various differentiated tools to support families according to their specific needs;
- Effectively integrate information systems and data on children, so that access to social assistance and social services is guaranteed and the state can monitor and ensure a minimum standard of living for every child in Bulgaria.



2.

FAMILY ENVIRONMENT AND ALTERNATIVE CARE

FAMILY ENVIRONMENT AND ALTERNATIVE CARE

AVERAGE 3.13

- lack of a comprehensive vision and strategy for supporting both children living in a family environment and those in residential care;
- lack of consistent and sustainable measures, including communication ones, aimed at reaffirming the positive image of adoption and foster care in Bulgaria;
- slow and cumbersome processes of deinstitutionalisation, high degrees of bureaucracy, limited human resources and capacity.



„The state should prioritize the financial assistance and effective support to children and families living in poverty and subject to social exclusion, marginalisation and discrimination. The problems of insecure and poor housing conditions of impoverished families should be solved at the municipal level, as they create conditions for the separation of children from their parents. Another unsolved problem is the lack of identification documents of over 200,000 Bulgarians, which directly affects the quality of life that these families can guarantee for their children and the development prospects for hundreds of children and families. There should be stronger support for single parents. The state ought to develop specialised foster care for children with disabilities, since the most strongly represented group in residential services is namely that of children and young people with disabilities.“

Survey, Report Card 2023

Parental Activism

In 2022, in the midst of a severe political crisis and lack of stable governance, the theme of parental activism remained completely absent from the platforms of the main political forces during the elections for 48th National Assembly. Systems such as the educational, social and the child protection one continued to fail to integrate effective tools for involvement tailored to the individual needs of the parent. For instance, promoting parental involvement in early childhood education and care services, as one of the main factors for assessing their quality, in 2022 remained a challenge for experts in the system. The capacity of child protection departments throughout the country for active and effective dialogue with parents remained subpar. There continued to be problems in places related to the placement of children outside the family, arising from a conflicting interpretation of the concept of „child at risk“, from the low quality of reintegration services, etc. The judicial practice continued to vary drastically in different courts regarding proceedings for placement of a child outside the biological family. Failure to introduce a comprehensive reform in juvenile justice and the prevention of child criminalization once again prevented the regulation

and launch of programs and services involving parents and the extended family in the process of resocialization of children in contact/conflict with the law. During the past calendar year, the levels of civic participation amongst vulnerable groups remained low.

Although it is positive that the National Strategy for Roma Equality, Inclusion and Participation (2021-2030), adopted in 2022, contains the horizontal goals of equality, inclusion and participation, these new goals are rather generic. Achieving equality, empowerment and democratic mobilization of Roma parents requires clearer goals, commitments and indicators for their achievement, which are presently absent from the Strategy.

A rather important figure for the full integration of some parents from vulnerable groups in the school communities is undoubtedly the one of educational mediators. In 2022, the unsustainable model of appointment, funding, supporting and monitoring of educational mediators continued to function. Moreover, on 22.12.2022, mere days before the Programme's expiration, the caretaker government continued partially, with an additional 6 months, one

of the activities under the National Programme „Support for Educational Mediators and Social Workers“.

A specific problem affecting parental community engagement and outreach in civic activation campaigns continued to be the social polarization and high levels of disinformation in Bulgaria, which often led to (attempted) objectification and “radicalization” of large parental communities in hybrid campaigns.



Disinformation on topics such as the National Strategy for the Child, „demonic Norwegians“, „gender people“ (a unique propaganda pejorative epithet that has struck a chord nation-wide), Ukrainian refugees, etc. further erodes the dialogue between civil organizations working with children and families (the only / main driver of initiatives promoting meaningful parental activism) and parents.

There was mainly activism on behalf of radical social platforms objecting children’s rights and related family policies. Bulgaria continued to be the country in the European Union most unable to withstand the negative impact of fake news and most vulnerable in the fight against it, as shown by the Media Literacy Index 2022 of the European Policy Initiative. Among the measures positively affecting parental activation stood the increased social payments. Most of the positive practices, however, continued to come predominantly from the civil sector, with the state continuing to not address family support policies through adequate resources (to the extent that such exist). In this sense, the initiatives promoting parental activism, which the “Tanya’s Dream” Fund supported as a key priority, proved particularly useful – i.e. the project “Mapping the Participation and Activism of Parents in the System of Children’s Rights in Bulgaria” of the Know-

how Center for Alternative Care for Children at the NBU. The task of ensuring that such initiatives are not hermetically encapsulated in the civil sector remains unresolved. Political instability and the lack of a clear horizon for planning and implementing long-term strategies and policies hindered all dialogue regarding the need to develop and adopt a unified Vision for Family Policy in Bulgaria.

Policies for families remained more developed in terms of institutional care and specialized services. There was an almost complete absence of conversation and action regarding the need for universal services and support for children who are being raised in their families and to those families/parents themselves. For this reason, parents and families remained peripheral and absent from sectoral policies. In Bulgaria, de facto, there continued to be no institution, unit or agency which collects, coordinates and guides the policies for children and the family, neither in the legislative nor in the executive branch of power.

Abandoned children

At the end of 2022, under the patronage of the Ombudswoman of the Republic of Bulgaria, Prof. Diana Kovacheva, the report “Abandoned Children: Between Labor Migration, Institutions and the Extended Family”, prepared under the ROMACT Programme of the Council of Europe, was presented. As previously noted within Report Card 2022, the problems of children, popularly referred to as Euro-orphans by the media, whose parents work temporarily or long-term abroad, and who are raised by relatives and friends, remain off the radar of Bulgarian institutions. The reason is that they are not formally defined by law as children at risk, and that oftentimes their looks and comportment do not give away that the children are indeed at risk. In practice, children of migrant parents are placed in an extremely vulnerable position and exhibit many symptoms of physical and mental retardation, depressive states, become victims of bullying and violence, etc. The report encompasses a number of specific recommendations to various stakeholders – parents, guardians and relevant institutions – on how to minimize the negative consequences for the children left behind.

Deinstitutionalisation and residential care

As of 30.09.2022, the total number of children and families who use social services in the community, including residential care, amounts to **15,262**.

The Social Services Act introduced a new paradigm for financing social services: solely social services included in the National Map of Social Services are financed from the state budget through the budgets of municipalities.



15 262

children and families
use community social services

Functioning social services for children in the country (as of 30.09.2022)



| | |
|------------|---|
| 144 | Centers for public support, with a total capacity of 5,895 places; |
| 1 | Center for public support/Community center for children and families, with a total capacity of 30 places; |
| 22 | Centers for working with street children, with a total capacity of 429 places; |
| 19 | Crisis centers for children, with a total capacity of 196 places; |
| 12 | "Mother and Baby" Units, with a total capacity of 75 places; |
| 143 | Family-type accommodation centers for children without disabilities, with a total capacity of 1,668 places; |
| 108 | Family-type accommodation centers for children with disabilities, with a total capacity of 1,452 places; |
| 7 | Family-type accommodation centers for children with disabilities, with a total capacity of 93 places; |
| 8 | Family-type accommodation centers for children in need of constant medical care, with a total capacity of 64 places; |
| 90 | 90 Day care centers for children with disabilities / severe multiple disabilities, with a total capacity of 2,526 places; |
| 6 | Day centers for children with disabilities / severe multiple disabilities, with a total capacity of 142 places; |
| 6 | Day centers for children with disabilities requiring weekly care, with a total capacity of 133 places; |
| 1 | Day center for supporting children with disabilities and their families, with a total capacity of 30 places; |
| 1 | Day center for supporting children with severe multiple disabilities and their families, with a total capacity of 30 places; |
| 1 | Day center for children and adults with disabilities, with a capacity of 50 places; |
| 18 | Transitional homes for children, with a total capacity of 142 places; |
| 55 | Centers for social rehabilitation and integration for children, with a total capacity of 1,933 places. |
| 1 | Center for social rehabilitation and integration for children and youth, with a total capacity of 25 places. |
| 3 | Centers for social rehabilitation and integration, with a total capacity of 100 places. |

The planned 2022 closure of the remaining 4 Medical and Social Care Homes in Pleven, Varna, Stara Zagora and Kardzhali did not take place. The reason continues to be that the authorities are behind schedule with the construction of the necessary substitute infrastructure (20 Centers for specialized health and social care for children with disabilities in need of constant medical care and 6 Centers for specialized health and social care for children with high-risk behavior and need for special health care).

Among the reasons given for the continued delay in the construction of the sites are issues that require additional funding and action on behalf of the Ministry of Health, such as objections to the work designs, lack of interest or termination of engineering, or suspension of construction and installation work that has begun due to inflation, the need to move water pipes or build retaining walls, to prepare and approve a mandatory building plan, to stipulate an agreement with the Ministry of Culture due to the construction project falling into a protected archaeological zone.

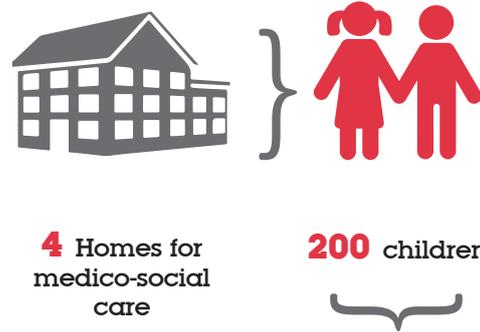
Meanwhile, 209 children continue to spend their childhood in specialised institutions, of which 82 are over 3 years old – permanently institutionalized with all the consequences of the latter. **It is noteworthy that a balance of leavers (85) and new arrivals (79) is maintained, both in general and by institution, which shows a desire for preservation of the status quo.**

Varna: 15 new arrivals and 13 leavers. Kardzhali: 7 new arrivals and 5 leavers. Pleven: 18 new arrivals and 24 leavers. Stara Zagora: 39 new arrivals and 43 leavers. Of the total number of new arrivals, only 5 children are over 3 years old. The largest number of children were accommodated in the maternity ward – 43, followed by the children’s ward – 24.

In 2022, re-assessments were made of the housed children, in order to update their removal plans. Of the re-evaluated 182 children, 115 need constant medical care and will remain in the homes until the centers are built. Children with moderate to severe disabilities do not require ongoing medical care and **their removal must not be delayed any longer**

The total number of children accommodated in homes for medical and social care for children as of 30.09.2022 is 200. **Deinstitutionalisation does not end with the closing of large institutions, since no child, regardless of their degree of disability or other specific individual condition, deserves to live and grow up without a family.** Residential care is a short transitional stage until developing a mature system that supports the biological family and provides foster care for those children who, despite the efforts of the system, cannot live with their parents. At the end of the year, an Action Plan for the Implementation of the European Child Guarantee (2030) was adopted, in which there are commitments and indicators **to reduce the number of children in residential care from 3,022 (as of 2021) to 2,000 (by 2030).** Although the figure at stake for such a large period seems small, it is recognized that children in residential care are particularly vulnerable, as it is difficult to provide individual care and attention in line with their needs.

Total number of children in Homes for medico-social care as of 30.09.2022, data by Ministry of Health



| 197 children | assessed (May – September 2022) |
|---------------------|--|
| 13 | for removal to a family-type accommodation center for children and youth with disabilities |
| 61 | for foster care |
| 117 | for accommodation in a family-type accommodation center for children and young people with disabilities in need of constant medical care |

| 11 children | removed (May – September 2022) |
|--------------------|---|
| 4 | in foster families |
| 4 | in a family-type accommodation center for children and young people with disabilities |
| 2 | in a family-type accommodation center for disabled children and youth with permanent medical care |
| 1 | is reintegrated into the biological family. |

Foster Care

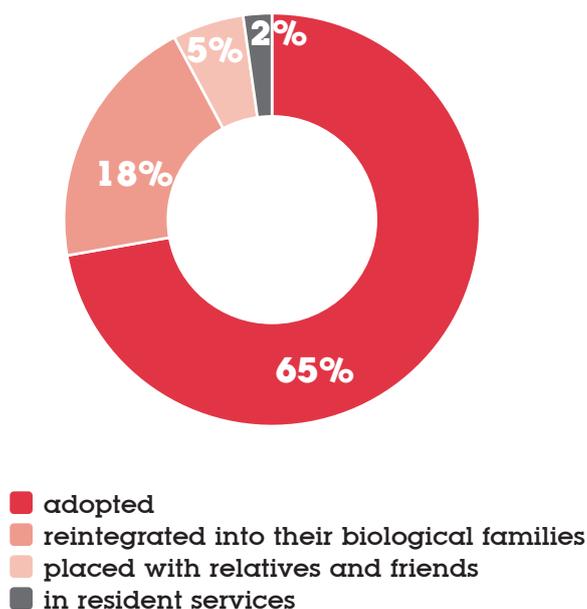
In 2022, the Ministry of Labor and Social Policy and the Agency for Social Assistance left foster care and its development at a standstill. With the frequent change of governments, policies related to foster care and kinship care were seriously neglected for another year. Apart from the big change „on paper“ from 2021 in the remuneration of foster parents from the state budget through the Social Assistance Agency, no significant changes can be accounted for (previously, foster care was financed entirely with European project funds). Although social workers continued their work on the relevant EU project, this did not drastically improve the quality of foster care and once again postponed the most important decision of the state – to ensure the long-term sustainability of the funding and management of foster care as a process, including the establishment of a mechanism for the participation of the civil sector in this. The political situation once again „froze“ the development of the project and the activities aimed at creating a single financial standard for the social service „foster care“.

In 2022, according to the Social Assistance Agency, 1,867 children were raised in foster families, and statistics show that the number of children without disabilities is significantly higher (1,705) compared to that of those with disabilities (162). Nearly 65% of the children removed from foster families in 2022 were adopted, 18% were reintegrated into their biological families, and less than 5% were placed with relatives and friends.

The specialization of foster parents, the attraction of voluntary foster parents, as well as the better organization and implementation of substitute foster care remain in the realm of the wishful thinking. Regarding the interest in foster care, the Social Assistance Agency’s data show that barely 85 applicants for foster care applied in 2022. Looking at the trends reported by the Agency, it is clear that interest in foster care in Bulgaria is decreasing with each passing year. At the same time, the number of erased foster families is impressive – 150. There are solely 4 voluntary foster families in the whole country .

This once again raises the question of the lack of any information campaign to raise public awareness and interest in foster care, since there is no dispute that foster parents are needed. In 2022, there was once more much to be desired in terms of improved communication and coordination at case level between social workers from Child Protection Departments, social workers from foster care teams and foster parents. One of the mechanisms for the improve-

Children removed from foster families in 2022



ment of teamwork skills, knowledge and competences for practicing social work involves trainings, individual and group supervisions. In 2022, not a single group supervision was conducted in 9 out of 28 regions of the country, and the average number of participating foster parents in these forms of support was less than 10 (in Plovdiv Region, for example, from nearly 100 foster families an average of 9 foster parents participate each year).

Nothing positive can be noted regarding kinship care, as well. As of 2022, 4,166 children have been placed with relatives. Financial support is provided for children placed in a family of relatives through the granting of one-time and monthly benefits.

In the last days of the work of the 48th National Assembly, a draft law was introduced for the amendment of the Family Code regarding the institution of adoption. The proposed changes concern two of the most „tickling“ issues in adoption, namely access to information about the biological origin of adopted persons and limiting the options for termination of adoption. The proposed amended text of Art. 105 of the Family Code clarifies and significantly expands the opportunities for adopted people to gain access to in-



Number applications of candidate for foster parents by year

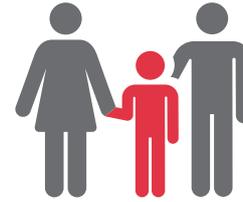


150 **4**
erased **voluntary**
 foster families foster families



In **470** foster families, no children are accommodated

In **10% от общините** of municipalities there are no active foster parents



4,166

children have been placed with relatives

formation about their biological origin. The other change is in the direction of limiting the options for termination of adoption. The submitted proposals for changes were discussed at a parliamentary round table with the participation of MPs, experts and representatives of non-governmental organizations, during which the problems in the field of adoption were raised with a commitment that they ought to be a priority in the legislative programme of the next National Assembly.

For another year, adoptions in the country remain few in number. There is a lack of in-depth analysis by the institutions and the state of the reasons for the decrease in the number of children in the Adoption Register. The monitoring carried out by Child Protection Departments in the post-adoption period is formal, often without real support and sensitivity to the past of children and adoptive par-

ents, and their individual traumas. There is a lack of regular training to maintain and increase the qualification of social workers from the departments for their work with prospective adopters, and the state has not committed to training specialists on adoption. There is also a lack of supervision of their daily field work with prospective adopters, adoptive families and adoptees. This poses a serious risk of not identifying problems within the adoptive family in time, which could lead to repeated abandonment of the child. There is further a lack of state involvement in awareness raising campaigns on the topic of adoption in educational institutions.

At the end of 2022, an amendment to the Act on Family Benefits for Children was passed, which entitles single adoptive parents to receive a monthly childcare allowance. This amendment comes into effect from 2023 onwards.

Protection and integration of unaccompanied minors

Inevitably, 2022 was a year related to refugee issues. After the start of the full-scale war in Ukraine, Bulgaria was faced with a serious refugee crisis. For the first time, the system for temporary protection was launched on the territory of the European Union, which allows protection for a certain period to be granted to all citizens of a certain country. Institutions had to respond as a matter of urgency by providing shelter to the arriving Ukrainians. De facto, a large part of the support of asylum seekers occurred primarily due to the actions of civil voluntary formations and NGOs. In 2022, the trend of growth of unaccompanied minors seeking international protection was maintained – they were 3348, compared to 799 in 2020. In 2022, there were 70 girls from Syria, Eritrea, Somalia, Afghanistan and Ukraine. The number of children under the age of 13 remained the same, with 409 this year and only 29 compared to the same period in 2020.

After almost 8 years of delay, this year the Coordination Mechanism for Interaction on Unaccompanied Minors was finally adopted. Although the Mechanism was adopted in April at the height of the Ukrainian refugee crisis, it is largely likely to apply mainly to refugees from Asian countries. An analysis of the measures for the protection and integration of unaccompanied children and migrants should take place with the aim of establishing firmly their legal status.

Unlawful detention

The newly adopted Coordination Mechanism should stop the practice of illegal detention of unaccompanied

minors in the Special Centers of the Migration Directorate. However, the Ministry of the Interior notes that 878 minors were identified in Special homes for temporary accommodation of foreigners, and the response of the Ministry does not make it clear how long the average stay in this institution was, despite the express prohibition of Art. 44, Para. 9 of the Act on Foreigners. The Ministry of the Interior states that in all cases measures are immediately taken to notify the Directorate for Social Assistance and the Department of Child Protection by district. The newly adopted Coordination Mechanism regulates the transfer of unaccompanied persons to the State Agency for Child Protection, with coordination on behalf of the Social Assistance Directorate. It should be noted that for the first time this year in the Ombudswoman's report on the national preventive mechanism it is noted that no unaccompanied minors were found in Special homes for temporary accommodation of foreigners. Although the SACP claim that the mechanism is applied in all cases, they do not provide specific data on number of cases involving its application.



The State Agency for Refugees reports that this year the 131 children who arrived on their own were duly registered and accommodated in the Agency's centers.

Accommodation of unaccompanied asylum seekers

Pursuant to the provisions of the Child Protection Act, unaccompanied minors are children at risk and, in this sense, their cases must be coordinated jointly by the relevant local Child Protection Departments and the State Agency for Child Protection. According to the relevant guidelines of the European Union, placement in residential services should be a last resort. This is well illustrated by the fact that the Social Assistance Agency provides data on merely 182 cases in which employees of Child Protection Departments were involved. Moreover, the Agency does not provide any data on the number of unaccompanied persons with temporary protection.

The National Health System requires that access to health services is done through registration with a personal physician, and this activity in the case of asylum seekers is largely carried out in collaboration between employees of the State Agency for Refugees and NGOs. The State Agency for Refugees does not keep statistics on how many unaccompanied persons are registered with a general practitioner and have sought medical care. At the same time, the Agency states that registration with a personal physician is not mandatory. Practice shows that, to a large extent, appointments with private doctors do not occur, and so the access of the unaccompanied person is mainly limited to the use of emergency units or assistance from NGOs to cover health services, which should be free, as they are covered by the health insurance.

So-called safe zones are established to provide residential services, yet their special methodology is not publicly available and has not been approved by the State Agency for Child Protection and the Agency for Social Assistance, which raises the question of the extent to which the national standards for the provision of residential childcare are met. This concerns both the conditions in them and the number of employees therein. The issue of personnel is an important factor defining the quality of care and the prevention of risk. The International Organization for Migration, which runs the two safe zones, released data that 23 experts were working in shifts directly with those accommodated. Given the number of unaccompanied minors in the safe zones, it is not clear to what extent it is possible in practice to work systematically with all those housed.

The situation with unaccompanied minors with temporary protection is rather different. In general, during the year, most of them were treated as accompanied, since they entered the country with relatives and friends. There were several instances of entire teams stationed at various bases around the country, accompanied by solely one or two adult coaches.

This practice was adopted to some extent also due to the inability of the system to answer to the large number of children who came to the country in a very short time and to provide them with adequate support. To a large extent, attempts to legalize accommodation have remained wishful thinking, as Ukrainian citizens refuse the issuance of accommodation orders under the Child Protection Act. According to the Social Assistance Agency's data, 155 cases were observed and the same number were provided with support and assistance.

Guaranteeing Representation

2022 is the second year of implementation of the amendment to the Asylum and Refugees Act which defined representation by a lawyer from the National Legal Aid Bureau's Legal Aid Register. According to data from the National Legal Aid Bureau, 3,382 decisions on representation were issued in 2022, of which 3,371 were on the territory of Sofia and Haskovo. There are 27 legal representatives appointed in the country, divided into: Registration and Reception Center Sofia (Ovcha Kupel, Military Ramp and Vrazhdebna) – 16 lawyers; Registration and Reception Center Harmanli (Haskovo District) – 8 lawyers; and for Registration and Reception Center Dolna Banya – 3. The Bureau does not provide statistics on the average number of cases that an attorney from the Register handles, which does not allow for a clear analysis of the work of the representatives. Access to them, as well as the provision of an interpreter, is determined by the State Agency for Refugees, which creates potential conflicts of interest and the risk of limiting access to legal representation. This was also a major concern expressed in the 2022 Report Card of the NNC. The question of how to ensure that the decisions of the legal representatives reflect the wishes of the unaccompanied and to what extent they should consult and work in cooperation with the relatives of the unaccompanied who are outside the country, also remains open. Another serious concern comes from the circumstance that the translation and communication is carried out mainly through the State Agency for Refugees, which is inevitably an involved party in each case and has its own interests and position.

Access to mental health and social services

Oftentimes, unaccompanied children are exposed to traumatic experiences before they start the migration and / or during the refugee journey. This adverse emotional experience subsequently leads to various psycho-emotional reactions. The State Agency for Refugees uses a questionnaire to assess traumatic experiences, yet the Agency has rendered information that solely 48 children were surveyed in 2022.

It remains unclear why these figures are so small, given that the migration route in itself is life-threatening and traumatic. Research indicates that about 19-52% of those exposed to traumatic events develop PTSD. According to the Agency's data, only 5 children who sought international protection had mental health needs. This figure raises reasonable doubts about the mental needs' assessment procedure. Further, the Agency states that there were no unaccompanied individuals identified as survivors of violence.

Solely 29 unaccompanied minors used social services, most of whom were placed in residential care. In 2022, the State Agency for Refugees under the Council of Ministers developed Rules for the Organisation of Placement of Minors and who Received International Protection in a Host Family, Social or Integrated Health Service and Social Service for Residential Care. The second positive factor in this process is a video developed by UNICEF to allow the unaccompanied to become familiar with relevant social services.

Access to mental health services for unaccompanied children with temporary protection

The complexity of determining the status of unaccompanied minors with temporary protection and the desire to recognize their basic needs as survivors of traumatic events, led to a large extent to the placement of unaccompanied minors with relatives. At the beginning of the crisis, there were one or two isolated cases of placement in social services, an approach that was quickly recognized as inefficient. Although this pattern is largely positive, in the context of the several situations of systemic uncertainty as to what will happen to the initially accommodated citizens with temporary protection in hotels, the stress and strain of caregivers has inevitably increased. In this context, the Child Protection Agency and the Social Assistance Agency state that they do not maintain data on how many unaccompanied children in temporary protection used psycho-social services, which is a rather worrying fact. Inevitably, a large part of the psycho-social support provided during the past tense year was the work of non-governmental organizations and the voluntary engagement of specialists.

Integration

Integration is a complex process, which ought to commence from the moment the person arrives in the country. **In order to have an effective integration of unaccompanied minors seeking international protection, it is crucial that they are first and foremost treated as children and not as asylum seekers.** This would allow for the introduction of a clear approach based on the framework of the rights of the child, which would entail systematic targeted work of the institutions in each stage of integration, from the establishment of the person at the border to their subsequent societal integration. In the current situation, after the decision on international protection has been issued, it remains unclear who and how precisely is responsible for monitoring the rights of the unaccompanied.

According to data from the Social Assistance Agency, before October 2022 protection measures were taken by Social Assistance Directorates in 45 cases, in which 10 children received "emergency replacement care", and 35 children received residential care. The State Refugee Agency and the Social Assistance Agency indicate that there is a procedure in force for the placement of unaccompanied persons in residential services, yet the issue of the language barrier remains.

The social integration of unaccompanied minors, unlike other groups of vulnerable children, is seriously hampered by the language barrier. There is further the matter of the lack of resources for interpreters for social service providers. Thus, access for unaccompanied minor takes place either through the cooperation of several non-gov-

ernmental organizations, or through the organizations working on the territory of the reception centers maintained by the State Agency for Refugees.

Access to education

Providing education is key to integration into the host society, and this year, unfortunately, the trend of very few unaccompanied minors attending school remains present. There is no evidence that an in-depth analysis has been conducted on this matter, and that any specific measures have been taken. Out of 1,500 children who fall under the age group of 16 and are subject to compulsory education, only 118 persons have submitted documents for enrollment in school. The State Agency for Refugees noted that 19 information sessions and targeted consultations were held, yet did not show a comprehensive analysis of the factors for the successful engagement of unaccompanied minors in the education system and the factors that influence the motivation of these young people. Enrollment of children in Bulgaria can take place no less than three grades behind the offered grade, according to their age. As the Agency itself notes, many of these youth are illiterate, even in their native language, and therefore lack any study habits whatsoever. Being integrated into a foreign language environment is very often an overwhelming challenge for them, especially considering that the country is not a final destination and many of them voluntarily leave or expect to be reunited with their families under the Dublin procedure.

Access to education for persons with temporary protection

Access to education for those arriving from Ukraine was a serious challenge from the beginning. Initially, the majority of children continued their studies remotely in the Ukrainian education system. With the beginning of the new school year, the Bulgarian education system faced the challenge of how to organize the enrollment of children in Bulgarian schools. The Ministry of Education does not maintain statistics on the number of unaccompanied minors enrolled in the education system, they provide general statistics for all those with temporary protection. For 2022, 1,738 students with temporary protection enrolled in school and 512 children enrolled in childcare facilities – i.e. less than 10% of all Ukrainian refugee children, contrary to all international recommendations for integration.



The issue of preventing school bullying of children coming from Ukraine also remains open.

RECOMMENDATIONS

- Adopt a unified state Vision for Family Policy, with a clear focus on promoting the civil participation of parents and increasing their democratic culture and mobilization, through initiatives in various systems (social, educational, child protection system, etc.);
- Analyze the responsibilities of Child Protection Departments and increase their capacity for active and substantive work with parents;
- Increase the capacity of Child Protection Departments to implement protection measures, along with measures to prevent abandonment and reintegration;
- Build uniform models of effective support for the whole family in the provision of different types of social services, which follow the matrix „one family – one plan – one expert leading the case“;
- Adopt a regulatory framework to stabilize the position of educational mediators (employment, remuneration, qualification, resource provision, monitoring, etc.);
- Address the issue (e.g., through targeted educational campaigns and programmes) of the instrumentalisation of parental communities in disinformation campaigns; work towards increasing the knowledge and sensitivity of parents regarding the problem of hybrid aggression, fake news and disinformation;
- Pilot programmes for the resocialisation of children in contact / conflict with the law, involving parents and the extended family in a proactive and meaningful manner.
- The Ministry of Health should redirect the necessary funds to build 15 Centers for specialised health and social care for children with disabilities in need of constant medical care, so that unnecessary institutionalisation of children does not continue in the last 4 primary care schools;
- The child protection system ought to mobilise and organise the removal of children who do not need permanent medical care in a planned manner and with the necessary preliminary preparation;
- Study and refine the mechanism of placement of new children, so that those who do not need constant medical care do not end up in homes for medico-social care for children;
- Develop robust mechanisms for preventive work with families, so as to prevent abandonment and to not place children with milder disabilities outside their family;
- Commence a national campaign for specialised foster care for children with disabilities, which includes foster parents with experience in caring for children with different degrees and types of disabilities;
- Solve the systemic problems related to the support of foster families who could care for children with disabilities – adaptation and accessibility of the home environment, accessible aids, appropriate transportation of the child, coordinated support of the health and education system, emergency medical care, hospital stays, taking responsibility for necessary yet risky medical interventions, mobile teams of therapists, being awarded the full amount from the Labor Expert Medical Commission, campaigns for public recognition of efforts to care for a special child;
- Provide additional training, supervision, and mentoring to a family-type placement centers for children and youth with disabilities that have available spaces for the successful relocation of children evaluated as eligible for this type of service.
- Conduct an analysis of the interaction of the system for international protection and the child protection system, which will establish how the child protection system should lead the cases of unaccompanied minors. In the analysis, plan measures to promote the placement of unaccompanied persons in foster families and targeted social services, which would allow the integration process to commence from the very beginning;
- Develop a mechanism for access to comprehensive medical services for all unaccompanied minors, either by appointing an official personal physician responsible for all or concluding a contract with a medical facility to provide for their medical needs;
- All unaccompanied minors should be assessed for traumatic experiences and included in educational programmes for emotional intelligence and conflict resolution;
- It is necessary to develop motivating educational alternatives, i.e. preparatory classes for language learning; dual education, with the possibility of a scholarship and obtaining certificates for mastering professional skills.

For unaccompanied children from Ukraine with temporary protection

- It is necessary for the State Agency for Child Protection and the Social Assistance Agency to coordinately track the cases of unaccompanied persons and collect statistics on their basic needs and psycho-social needs, which would allow for better planning of accessible targeted services;
- Develop short-term training modules to train Russian-speaking specialists in a trauma-oriented approach and to hire such specialists in Social Assistance Directorates and Regional Directorates of Education to actively assist in such cases.



3.

**PROTECTION OF CHILDREN
FROM ALL FORMS OF VIOLENCE**

PROTECTION OF CHILDREN FROM ALL FORMS OF VIOLENCE

AVERAGE 3.33

- lack of maintained unified system for registering cases of violence against children;
- lack of adopted comprehensive state vision and policies for coordinated institutional addressing of the problem of violence against children, incl. violence on the Internet;
- risk of critical deterioration of the protection of children from abuse online as a result of the insecure functioning of the Bulgarian Safer Internet Centre.



“The child should talk to an adult about the abuse and not be afraid.”

Child Survey, 2023



“We need a complete legal reform and a policy that guarantees to a much greater extent the protection of children from violence! It is necessary to work in the direction of „schools for parents“, to work with citizens and NGOs, with psychologists, to work in the direction of easier access for children to psychological support in schools, so as to be able to react more quickly on reports of violence.”

Survey, Report Card 2023

PROTECTION OF CHILDREN FROM ALL FORMS OF VIOLENCE



In 2022, there is still no unified system for registering cases of violence against children in Bulgaria.

Different institutions continue to maintain their own separate statistics, with some of the data diverging drastically. A comprehensive analysis of registered cases of crimes against children is also missing.

CYBERBULLYING

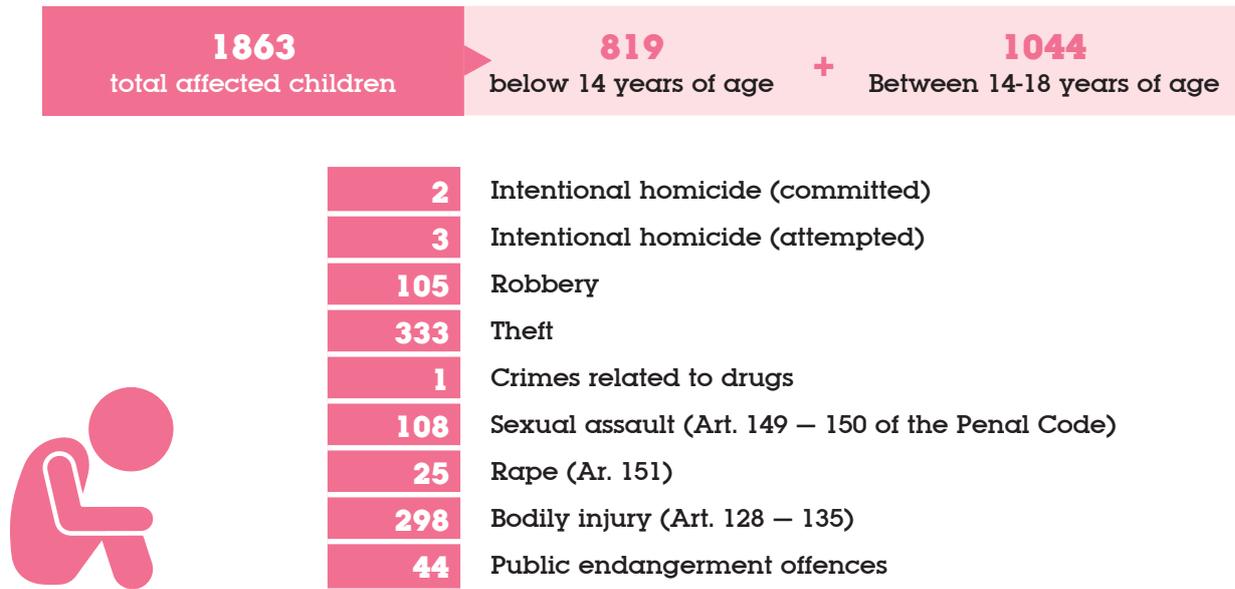
Child researchers from the National Eurochild Forum – Bulgaria (NEF)

Child researchers from NEF performed research on the scale of the issue of cyberbullying in Bulgaria and devised a questionnaire for interviews with young people. The opinions of 80 young people aged 12-19 were collected. Most often, the persons examined indicated that they are interested in what the reasons behind the phenomenon are (whether the individual perpetrator feels loved; to what extent they realize that what they are doing indeed constitutes harassment; what their relationships with their close people look like), whether cyberbullying brings pleasure to the ones who conduct it, as well as what a person feels when they bully others online. According to young people, parents should talk to their child if she/he is bullying others online. Although a common association of the respondents refers to punishment, they report that it is very important for the parent to be interested in the reasons that lead to such behaviour. According to the youth, it is key for the parent to encourage their child to use psychological support. The youth support limiting social media access as a measure which parents may resort to should their child be cyberbullying.

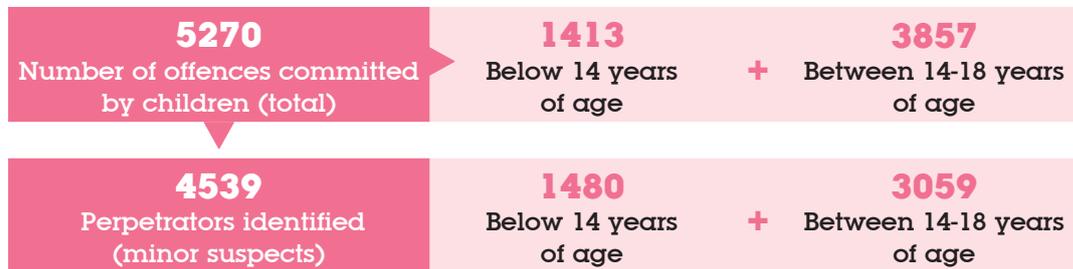
The full article is available at:

<https://nmd.bg/spored-mladezhite-temata-vkibertormozv-tryabva-da-vleze-v-utchebnata-programa/>

Number of offences committed against children in 2022



Number and type of offences committed by children



| | |
|------------|----------------------------------|
| 2 | Intentional homicide (committed) |
| 0 | Intentional homicide (attempted) |
| 161 | Robbery |

2517 Theft

| | |
|------------|-----------------------|
| 181 | Breaking and entering |
| 55 | Pickpocketing |
| 354 | Home burglary |
| 861 | Shoplifting |



Violence in schools

We talk about school bullying when a student is exposed to systematic forms of intentional aggressive behavior by other student/students who intentionally cause pain or discomfort in physical or psychological terms. These are not simply situations in which children „behave in a playful manner“ or „mess around“, but situations of power imbalance in which one party has a physical or psychological advantage and utilizes it with the aim of imposing dominance over the aggrieved party, through physical harassment, verbal attacks, teasing, calling names, manipulation, social exclusion, spreading gossip, stealing pocket money, breaking things and so on.

This issue is undoubtedly common and rather serious in Bulgaria. Presently, information on cases of school bullying is collected by the Ministry of Education and Science in compliance with the implementation of the *Mechanism for Countering Bullying and Violence in Institutions in the System of Preschool and School Education*. Thus, for the academic year 2021/2022, data show 558 incidents of bullying along with 1,498 incidents of physical assault, and 2,160 incidents of verbal aggression, which we can assume were counted as one-off incidents (these data do not equate to a number of separate cases, some incidents may involve the same perpetrators and victims). **We can further assume that the described cases of harassment are the more severe and serious ones, beyond which there remain many other, “lighter” cases (at first glance), or ones unrecognized as harassment, since reporting such cases is not systematic.**

It is important to bear in mind that school bullying is not an issue which children tend to report readily – for fear of making the situation more complicated, for lack of a trusted adult, for fear of being labeled as weaklings themselves, amongst other common causes. It is also likely that schools in some cases ignore such cases due to a desire to maintain a good reputation or attitudes towards normalising, underestimating or trivialising the issue. At

Violence against children in the academic year 2021/2022



558
bullying incidents



1498
incidents of physical
harassment



2160
incidents of verbal
aggression

Source: Ministry of Education and Science

the same time, the media is a constant source of information about cases, of bullying at school and between children – i.e. a plethora of publications with shocking titles such as: “Aggression between schoolgirls”, “Students beat an 11-year-old child with a whip”, “Cruelty between children” abound.

Protection from domestic violence and penal policy in the field of domestic violence against children

In 2022, the most significant progress in the field of preventing and sanctioning domestic violence was the drafted Act for the Amendment of the Act on Protection from Domestic Violence, approved by Decision No. 503 of the Council of Ministers of July 21, 2022 and submitted to the National Assembly. Notwithstanding, due to the political and governmental crisis, there was no further development on this topic. To the extent that the drafted bill passed through public discussion in 2022, we insist on priority consideration and adoption of the proposals made by the National Assembly, which would fulfill partially the state’s commitments to children who have suffered from domestic violence.

In the context of more effective law enforcement and access to justice for all victims of domestic violence, including all children, the bill provides for, as follows:

- legal amendments aimed at meeting international standards for guaranteeing the rights and best interests of children affected by domestic violence;
- amendments in the concept of domestic violence in order to synchronize the latter with the definition of domestic violence as set out in EU law;
- better access to justice in the initiation of proceedings for the issuance of a protection order to the relevant district court;
- the range of persons who have suffered from domestic violence who can seek protection is expanded, through the addition of the following categories to the list of perpetrators, namely: persons entrusted with the care of the child; relatives by law or by collateral line up to the fourth degree; ex-spouse; the person who is or was in de facto conjugal cohabitation with the victim;
- the protection measures that can be imposed by the

competent authorities are increased, providing for the special measure of help and support for children, victims or witnesses of violence;

- the range of persons who can initiate proceedings before the court for the issuance of a protection order is expanded and access to justice is facilitated, providing for any injured person, regardless of whether they have reached the age of 18 or are placed under limited or full custody barred from having the right to apply for protection. In addition to expanding the range of victims who can seek protection under the Act on Protection from Domestic Violence, it is envisaged that the proceedings can also be initiated at the request of the prosecutor, which is an additional guarantee for the protection of the rights of the victims, especially when children are concerned;
- an enhanced judicial process is foreseen, as the court can collect evidence on its own initiative, and is obliged to assess the risk, especially when there is an injured child;
- a wide possibility for providing pro bono legal assistance in proceedings under the Act on Protection from Domestic Violence is foreseen;

- for the first time, it is possible not to interrupt parent-child contact during an imposed protection measure, as the contact continues to take place within a protected environment under the supervision of a trained professional;
- prevention and protection programmes are regulated, as well as specialized services providing protection, help and support to persons and children who have suffered from domestic violence or are at risk, amongst which, as follows: a national helpline for persons (incl. children) who have suffered from domestic violence or are at risk, counseling centers, sheltered housing.

The above changes are in the context of improving justice for children affected by domestic violence. In general, with the adoption of the proposed Act for the Amendment of the Act on Protection from Domestic Violence, the judicial procedure for imposing protection measures from domestic violence will be optimized and improved in the direction of speed, effective law enforcement and the establishment of guarantees for the protection of the best interests of complainants, including injured children.

Child neglect and abuse in cyberspace

According to UNICEF, every second child (47%) has experienced some form of abuse, with emotional abuse being the most common type. More than 40% of bullying occurs online, and figures from the Online Safety Advice Line (124-123), collected over the past three years, show that most cases for which people seek help are related to online bullying. The Illegal and Harmful Online Content and Behavior Helpline and the Online Safety Helpline are services provided by the Bulgarian Safer Internet Centre, part of the European Insafe Helpline Network. The hotline receives reports of severe violence, trafficking and sexual exploitation of children, and the advisory line – cases of online harassment, encounters with harmful and dangerous content, etc. These signals are subsequently sent to the Ministry of Internal Affairs, the General Directorate for Combating Organized Crime and Interpol, which attempt to jointly catch the offenders. **On an annual basis, the two services administer approximately 16,000 cases of child victims of online violence, harassment, abuse, trafficking and sexual exploitation.** In the past year, signals regarding stolen profiles and fake profiles predominated, and the number of parents calling also increased. According to data of the Center, approximately 90% of the reports received concern online sexual exploitation.

Since 2009, the State Agency for Child Protection has been managing the National Telephone Line for Children 116 111. In cases of calls reporting cyberviolence, the latter are referred as a matter of urgency and competence to the General Directorate for Combating Organized Crime to the Ministry of the Interior. Direct contacts and exceptionally fruitful cooperation have been established over the years between the SACP and the Cybersecurity Department of the General Directorate. In this regard, in 2022 there were many reports, among which 6 reports of cyberbullying, to the National Telephone Line 116 111. The National Telephone Line is a member of the global network Child

Other startling data from recent years include

- 97%** recorded increase in online luring of children;
- 63%** reports of child abuse increased
- 155%** the use of hidden services for the distribution of sexual abuse materials increased
- 84%** of children report that they have experienced aggression on social networks;
- 39%** of children report that their profile was stolen (according to <https://detointernet.bg/>);
- 1 in 7** children confirms that they have been a victim of online bullying, most often on social networks and discussion forums.

Helpline International, represented in 142 countries and encompassing 173 member lines.

The maintenance of the National Telephone Line for Children is an obligation of the Bulgarian state, which stems from a resolution of the European Parliament and should be implemented with targeted funding from the state budget, with the highest attainable

quality. This line exists first and foremost to render timely, safe and accessible support to children. In this regard, the decision taken in July 2022 to transfer it to the structures of the Social Assistance Agency is absolutely bewildering, especially with view to the circumstance that the objections of interested parties have been unceremoniously ignored. At the same time, along with the systematic destruction of the National Telephone Line for Children, the Center for Safer Internet is about to close due to lack of support from the state. Only due to an urgent intervention on behalf of UNICEF, the Center for Safer Internet continues to work until the end of 2022. The existence of the Center is of critical importance for our country, as it fulfills the state commitments of the Republic of Bulgaria, arising from the fact that our country is a party to numerous international treaties that provide for the existence of such lines. Pursuant to various directives of the European Union, this service should exist in our country, as well as in all other EU member states. For the 16 years of existence of the National Center for Safe Internet, more than 63,000 reports of violence and harassment of children online have been processed there, submitted by children themselves, parents and professionals, and on average there have been about 1400 reports per month. For comparison, the number of similar cases administered through the National Telephone Line for Children, which is managed by the SACP, is a single digit number for 2022.

According to a 2021 Interpol report, cybercrimes worldwide increased by more than 300%, incl. cybercrimes against children, as cited by the cyber security expert Yavor Kolev, one of the faces of the “Keep the Child on the Internet” campaign of the Lev Ins insurance company. The project aims to provide protection for children, as well as develop their skills for safely navigating the Internet. The initiative is supported by the Bulgarian Ombudswoman, whilst partners of the campaign are also the Ministry of Education, the National Network for Children, the Association of Bulgarian Cities and Regions, the Bulgarian Association for Cyber Security, universities, municipalities and many more state, municipal and private organizations. During the initiative’s first stage, the programme covered about 100,000 children, teaching staff, state and municipal employees from throughout the country. Each meeting under the initiative begins with a 10-minute video prepared by Europol and the General Directorate for Combating Organized Crime, after which the children also watch a presentation covering the main offences on the Internet, with special focus on most dangerous of them – namely the sexual exploitation.



According to a 2021 Interpol report, cybercrimes worldwide have increased by more than 300%, incl. cybercrimes against children



Every second child (47%) has experienced some form of abuse



More than 40% of bullying occurs online



90% of the reports received concern online sexual exploitation.

as cited by the cyber security expert Yavor Kolev, one of the faces of the “Keep the Child on the Internet” campaign of the Lev Ins insurance company. The project aims to provide protection for children, as well as develop their skills for safely navigating the Internet. The initiative is supported by the Bulgarian Ombudswoman, whilst partners of the campaign are also the Ministry of Education, the National Network for Children, the Association of Bulgarian Cities and Regions, the Bulgarian Association for Cyber Security, universities, municipalities and many more state, municipal and private organizations. During the initiative’s first stage, the programme covered about 100,000 children, teaching staff, state and municipal employees from throughout the country. Each meeting under the initiative begins with a 10-minute video prepared by Europol and the General Directorate for Combating Organized Crime, after which the children also watch a presentation covering the main offences on the Internet, with special focus on most dangerous of them – namely the sexual exploitation.

RECOMMENDATIONS

- Pilot initiatives, programmes and prevention models, along with mechanisms for measuring their effectiveness;
- Develop programmes for the prevention of harassment and violence, to be applied systematically and to cover all regions in the country;
- Develop services for dealing with severe cases of violence that support the school and the family, yet are external to them, to serve as a buffer through which conflicts are mediated and resolved;
- The protection system ought to work in close and active cooperation with schools and educational institutions.
- Provide immediate, comprehensive and ongoing support to the *Children's Online Safety Hotline and Advisory Line – 124 123*;
- Keep the National Children's Helpline under the SACF where it belongs and take action to improve its effectiveness;
- Develop clear governmental policies to protect children in cyberspace;
- Build a unified state system with a database on violence committed against children and the measures taken therein, with the functionality of rendering analysis and evaluation of trends, policies and measures;
- Raise awareness of the dangers of child neglect and abuse in cyberspace;
- Increase the focus on more subtle forms of child abuse, including online bullying and online sexual abuse.



4.

CHILD JUSTICE

CHILD JUSTICE

GOOD 3.52

- continued stagnation in the field of criminal justice for children;
- insufficient programmes and services for the prevention of child criminalisation and for the reintegration into society of children in conflict with the law.



“Do we fathom that children's rights are a part of the rule of law?”

Velina Todorova, LexTalks 2022



“In our criminal justice system, a minor perpetrator can be tried as an adult. The state does not support young people in conflict with the law to be full-fledged citizens, there are no social programmes for their resocialisation, and the penal system remains utterly repressive.”

Maria Doychinova, LexTalks 2022

Rights of child victims and / or witnesses of violence

The Ministry of Justice prepared a draft Law for the Amendment of the Criminal Procedural Code, which also encompasses amendments to the Act on Assistance and Financial Compensation to Crime Victims. The aim is to expand the list of procedural rights of victims in order to transpose in full the minimum standards set out in Directive 2012/29/EU of the European Parliament and of the Council of 25 October 2012 establishing minimum standards for the rights, support and protection of victims of crimes. Victims of crimes, who in 90% of the cases also participate as witnesses in the same criminal proceedings, must have the opportunity to be accompanied by a person of their choice.

In the past year, these legislative measures were not adopted, which can be explained by the short-term mandate of the National Assembly and the deepening political crisis in the country. There is still no adopted normative regulation that would limit the performance of repeated procedural and investigative actions with the participation of the child victim. Since child victims of crimes are always persons with a specific need for protection, it was envisaged that they would be interrogated in a room suitable for this purpose, in the presence of a pedagogue or psy-

chologist, by the same investigative body, if re-interrogation was necessary. After repeated interdepartmental coordination and approval by the Council of Ministers, the Draft Law for the Amendment of Criminal Procedural Code was submitted to the 48th National Assembly on October 24, 2022. The text of the draft law is published on the website of the National Assembly: <https://parliament.bg/bg/bills/ID/164366>. The bill was not passed, and the issues related to the strengthening of the procedural status of child victims of crimes and witnesses of crimes remain with an unclear future.

Regarding violence against children in a virtual environment, it is alarming that in 2022, despite numerous appeals by the National Network for Children, the state did not allocate funds to continue the activity of the National Center for Safe Internet. Since 2005, the Center has handled nearly 15,000 cases per year of child victims of online violence, harassment, abuse, trafficking and sexual exploitation. Although the trend of steady increase in the number of signals over the years shows the accumulation of serious public recognition and trust vested in the Center, the state found neither a short-term, nor a long-term solution for the stable funding of the Center.

Rights of children suspected or accused of committing an offence

The Ministry of Justice has undertaken the obligation, within the Draft Law for the Amendment of the Criminal Procedural Code cited above, to provide for some of the requirements of Directive (EU) 2016/800 on procedural guarantees for children who are suspects or accused in

criminal proceedings. The bill proposes an expansion of the catalogue of procedural rights of the accused minor by adding the following: the right of a parent, guardian, or person legally caring for the minor to be fully informed of their rights in the criminal proceedings; for the minor to be

accompanied in the court sessions in which they participate, when this is in their best interests and will not hinder the criminal proceedings, and in actions on the investigation during the pre-trial proceedings; right to medical examination during detention; right to have their personal characteristics evaluated; protection of the right to private and family life, etc. However, some of the key norms of Directive (EU) 2016/800 and Directive 2012/29/EU remain incompletely transposed. These concern the individual assessment of the child, which is an important tool for assessing the best interests of the child in the criminal proceedings and for taking measures to protect the minor's basic rights to education, health care, social rehabilitation and resocialisation. Thus, the goals set out within these two directives presently cannot be accomplished in Bulgaria in full.

A large part of the aforementioned procedural rights are not guaranteed through appropriate means of protection. The participation of educators, psychologists, doctors or other specialists in the questioning of the minor was proposed, yet only at the discretion of the decision-making body. The matter of the admissible presence of a parent, guardian or other person legally caring for the accused is to be decided by the supervising prosecutor, after a judgment of the best interests of the minor and only if it will not hinder the criminal proceedings. This would mean that for each specific case, for each interrogation, there would have to be a permission from the supervising prosecutor on the basis of „expediency“, which would unjustifiably delay the criminal proceedings. The bill does not include a regulation on how to proceed in the event of an unjustified refusal on behalf of the prosecutor. The proposed amendments to the Criminal Procedural Code in connection with the questioning of an accused minor and the preparation of an audio-video recording pose the danger that at a later stage they will lead to a result devoid of evidential value for the purposes of the trial.

Although the bill explicitly states that cases under Chapter Thirty of the the Criminal Procedural Code would be con-

sidered with high priority, and the members of the court should have specialized knowledge in the field of children's rights, these legislative proposals were not adopted. Furthermore, the requirement that jurors be educators continues to be disregarded by the system of random assignment of cases.

The bill submitted to the 44th National Assembly on November 10, 2020 was subject to repeated interdepartmental coordination, and according to data from the Ministry of Justice, after approval by the Council of Ministers, it was submitted to the 48th National Assembly on October 24, 2022.

The NNC's Legal Aid Network, in partnership with the Bulgarian Helsinki Committee, presented in Parliament a proposal on the draft law, through which it called for the new legislation to cover quasi-criminal proceedings against children under the Decree on Combating Minor Hooliganism and the Act on the Protection of Public Order in the Conduct of Sports Events. The NNC also called for the requirement to be informed to be applied further in cases of detention under Art. 72, Para. 1, item 1 of the Criminal Code (when there is evidence that the detained person has committed a crime). The NNC proposal also contained other recommendations, incl. which measures should be provided to guarantee the right of detained minors to education and training, their right to family life and their access to programmes to promote their development and resocialisation. Given the deepening political crisis in our country and the dissolution of the National Assembly, the intended amendments and additions regarding the rights of the accused children remained unadopted.

The activity of the working group established under the supervision of the General Directorate National Police, tasked with reviewing Instruction No. 8121z-78/24.01.2015 on the Procedure for carrying out detention, and the equipment of the premises for the accommodation of detained persons, is evaluated positively by NNC's Legal Aid Network. The results of the working group's activity will become clear in 2023.

Safeguarding the best interests of the child in legal proceedings. Proceedings under the Family Code – parental conflicts

At the end of 2022, the Supreme Judicial Council's pilot programme involving the requirement of parties in divorce cases, disputes regarding modification of measures related to parental responsibility and personal relations with grandparents, to go through an initial informational mediation meeting, commenced officially. The programme envisages that during this meeting the parties will become fully cognizant of the benefits of the mediation procedure, as a result of which they will likely proceed with amicable dispute resolution. Results of the Supreme Judicial Council's pilot program have not yet been released, yet expectations are high.

In parallel with this, in 2022 the Council of Ministers adopted a Draft Law for the Amendment of the Act on Mediation and a Draft Law for the Amendment of the Civil Procedure Code, which provide for a mandatory first informational mediation meeting cases under the Family Code concerning parental conflicts. The two draft laws implement the

measures to improve access to justice provided for within the National Recovery and Resilience Plan of Bulgaria. **Notwithstanding the circumstance that these initiatives can be evaluated positively, in Bulgairia there is still an utter lack of a unified approach to the multidisciplinary resolution of family conflicts in a way that allows for giving priority to the best interests of the child, and the need for ADR in resolving parental conflicts is glaring.**

The state's commitment to facilitate the resolution of parental conflicts by giving priority to the best interests of the child remains unfulfilled. There continues to be a lack of a unified methodology for multidisciplinary work on such cases, and the need for social work with each member of the family in conflict has only exacerbated. Oftentimes, such disputes are referred to court absent any psycho-social work with the child aimed at overcoming the negatives of the parental conflict. There is also a significant difficulty in the forced implementation of the established regimes

of personal contacts and payment of alimony. The latter is also confirmed by the latest annual report of the Sofia District Court, to which the largest mediation center in the country operates, and which notes that for 2021 the number of cases referred to a mediation procedure has halved.

Only 65 mediation meetings were administered, compared to a total of 111 in 2020. Of these 65 mediation meetings, 38 were not held in full due to refusal by the parties, and the total agreements reached for the year amounted to solely 9.

RECOMMENDATIONS

- Improve the work of coordination mechanisms to ensure the protection of children at risk or victims of violence / exploitation;
- Ensure the full transposition of Directive (EU) 2016/800 of the European Parliament of 11 May 2016 on procedural guarantees for children who are suspected or accused in criminal proceedings, and of Directive 2012/29/EU of European Parliament of 25 October 2012 establishing minimum standards for the rights, support and protection of victims of crime;
- Devise a sustainable mechanism for state funding of the National Safer Internet Centre.
- Initiate discussion at the level of the Council of Ministers on the role of the Ministry of Labor and Social Policy for the reform of policies for children for prevention of illegal behavior through the development of specialized services for children with behavioral difficulties;
- Ensure the full transposition of Directive (EU) 2016/800 and of Directive 2012/29/EU;
- The new legislation should also cover quasi-criminal proceedings against children under the Decree on Combating Minor Hooliganism and the Act on the Protection of Public Order in the Conduct of Sports Events;
- Introduce an obligation for the competent authorities to provide legal protection, regardless of whether the minor has exercised their right to request such protection;
- The requirement for information ought to be applied also in case of detention under Art. 72, Para. 1, item 1 of the Act on the Ministry of Interior;
- Introduce individual assessment as provided for in the two relevant directives;
- The Criminal Procedural Code and the Act on Support and Financial Compensation of Victims of Crime ought to be harmonized with the Social Services Act;
- Provide appropriate measures to guarantee the right of detained minors to education and training, their right to family life and access to programmes to promote their development and reintegration into society;
- Introduce training for magistrates, investigative bodies, and jurors on specific challenges of working with children in contact / conflict with the law.
- Introduce adapted procedures to guarantee the right of every child to be heard in all proceedings that affect their life and well-being – criminal, civil and administrative;
- Adopt amendments to ensure that children have access to pro bono quality legal aid provided by the state;
- Adopt new regulations that meet fully the relevant international standards for guaranteeing the rights and best interests of child witnesses and victims of violence.
- Introduce a uniform methodology for multidisciplinary resolution of parental conflicts, which would focus on the best interests of the child and include mandatory family mediation (mandatory first meeting with the mediator), with the aim of reducing the adversity between the parents and placing focus on their child's best interests;
- Adopt a uniform standard for working with children in judicial and extrajudicial proceedings, according to which all experts working in the field will be trained.



5.

EARLY CHILDHOOD DEVELOPMENT

EARLY CHILDHOOD DEVELOPMENT

AVERAGE 3.48

- lack of shared understanding of early childhood development and national strategy in the field;
- lack of focus on maternal and child health;
- large regional and ethnic disparities;
- lack of sufficient number and sufficient quality and variety of services for early education and care;
- lack of mass early screening of all children;
- lack of a unified referral system for early childhood intervention services.



“More commitment to children with special educational needs, especially in kindergartens. Resource teachers are few and often work ineffectively with these children. My personal experience dictates that if the work is more in-depth, the progress will be much more tangible. And there will be no need for additional therapies, which we now involve the child in, so as to catch up on developmental delays.”



“We need to address the issues of access of ALL pregnant women to examinations during pregnancy; in maternity wards – babies should not be separated from their mothers after birth; we need to stimulate and support breastfeeding immediately after birth; all babies can be registered with a general practitioner after birth – if there are no willing general practitioners, the child should be registered through a pre-established procedure for the appointment of a doctor.”

Survey, Report Card 2023

Care of children within the prenatal period

In 2022, the LARGO Association, the National Network of Health Mediators, the Club of Non-Profit Organizations in Targovishte and the Thirst for Life Association in Sliven conducted a large advocacy campaign under the title „Every baby is priceless!“. It was aimed at amending the existing Ordinance No. 26 of 14.06.2007 of the Ministry of Health. Pursuant to this Ordinance, for more than a decade, uninsured pregnant women in Bulgaria had the right to one examination during the pregnancy period, which did not meet the established international standards for pregnancy monitoring and lead to a plethora of risks for the mother and especially for the baby. The goal of the advocacy campaign was to amend the Ordinance, so that every pregnant woman would receive more screenings and tests to monitor her pregnancy, regardless of her health insurance status. The request for legal amendments was based on an analysis of the risks of the lack of medical care and economic arguments detailed in the study „The Cost of Indifference“ carried out in 2021 by the LARGO Association.

After a series of meetings at the regional and national level and with the support of the Health Commission within the 47th National Assembly, the Ministry of Health adopted changes to the Ordinance to improve the access of unin-

sured women to pregnancy monitoring. Among them is the provision of:

- hospital medical care under clinical pathway (CPW) No. 001 “Inpatient care in high-risk pregnancy”; which can be provided up to two times during the pregnancy period;
- up to four preventive examinations during pregnancy for each woman without health insurance;
- extended package of laboratory tests.

Preventive examinations include: anamnesis, evaluation of risk factors, determination of the probable date of birth, measurement of arterial blood pressure, anthropometry with external pelvimetry, gynecological examination, examination of children’s heart sounds, should the age period allow it, obstetric ultrasound, subsequent interpretation of the analysis and carrying out additional tests, complete blood count, erythrocyte sedimentation rate, blood sugar, urine – sediment, urobilinogen, glucose, ketones, albumin, syphilis test, single test for hepatitis B (HbS Ag), and with the patient’s consent – tests for HIV; microbiological examination of vaginal discharge, determination of blood group and Rh factor.

Improved access of uninsured women to pregnancy follow-up



Hospital medical assistance

through clinical path No. 001



4 preventive examinations in the pregnancy period



Extended package of **laboratory examination**

The amendments in the Ordinance were supposed to enter into force as of January 1, 2023, and their financing was to be covered by the state budget. In the present absence of an Act on the State Budget for 2023, it is not clear how the necessary examinations will be provided and whether the Ministry of Health will carry out an information campaign about the amendments to Ordinance 26, aimed at Regional Health Inspectorates, hospitals

with obstetrics, gynecology departments and specialists obstetricians and gynecologists. The implementation of a large-scale information campaign in 2023 is planned by the non-governmental sector. It will be aimed at the following three main target groups:

- doctors and other health care professionals;
- health mediators, social workers and specialists providing social services;
- women in a socially vulnerable situation who need support.

A key role in the campaign will be played by health mediators who cooperate daily with doctors, regional health inspectorates, hospitals and NGOs in the field to support women who are in the most dire socio-economic situations.

The aforementioned reforms adopted with the aim of provision of better care for all babies and their mothers are undoubtedly a step forward, yet a number of large unsolved problems remains. Among them are the following matters:

- postnatal care of the mother and the newborn – the cited amendments in the Ordinance do not provide for an examination until 42 days after childbirth;
- access to adequate health education in the field of family planning and sexual health;
- the provision of better information and in the event that parents express such desire – access to means of contraception.

Programmes for supporting responsible parenthood and improving the quality of care for children 0-3 years old

We can note as progress the amendments within Ordinance No. 9 of 2019 of the Ministry of Health to determine the package of health activities guaranteed by the budget of the National Health Insurance Fund for home visits within 14 days after birth, with a tendency for this term to increase to 6 months, yet, at the same time, there is a lack of long-term universal and targeted patronage care for the most vulnerable.

Access to medication

According to the Trust for a Social Alternative, the lack of a national medicines policy stands out as a major barrier to more accessible health care, especially in the area of maternal and child health, where there is a serious shortage of funds to cover children's medicines. The poor and vulnerable groups are most affected. Although they have access to medical care and specialists, due to the absence of a sustainable national drug policy, medicines for outpatient treatment remain unavailable, and child and maternal health care are insufficient and ineffective.

According to data from the Country Health Profile 2021, the share of direct payments from patients represents 38% of the total expenditure (approximately 2 times more than the average for the EU – 15.4%, of which 25.1% is allocated for medicinal products). Considering that Bulgaria is one of the poorest countries in the EU (with the lowest GDP, 45% below the EU average), the population not only has a hard

time covering the costs of medicines, but also other basic household needs. Such a targeted service is being piloted by the Social Alternative Trust Foundation, and has proven to positively impact all aspects of child development, including health, nutrition, responsive parenting, safety and security, early learning. The users of this service are young mothers who give birth for the first time and live in poverty.

time covering the costs of medicines, but also other basic household needs.

Although children up to 3 years of age have access to medical care and specialists, and the National Health Insurance Fund covers some medicines partially or fully, the available funds for covering medication are insufficient. Only 11-13% of the budget of the National Health Insurance Fund is for children's health, of which 5% is intended for medicinal products. According to a 2019 study by the Bulgarian Pediatric Association – for health care for a child up to 1 year old, about BGN 100 extra is spent monthly, half of which is for medicines. Therefore, access to health care for children up to 3 years old and their mothers is limited – despite medical assistance and options for consultations with specialists. Not everyone can afford to allocate large enough monthly resource for health care.

Early learning

On the matter of early learning in 2022, the following developments can be noted:

- A proposal for a National Framework for the Quality of Early Childhood Education and Care Services has been developed in the context of the European Quality Framework for Early Childhood Education and Care Services;
- Amendments were adopted in the Ordinance on the Organization and Operation of Nurseries and Social Kitchens and the Relevant Health Requirements, which allows, should it be impossible to provide enough nurses in the nurseries, to appoint teachers, paramedics or medical assistants to vacant positions; this regulation applies from 01.01.2023, so no conclusion can be drawn about its practical effect yet;
- At the end of the year, an Act for the Amendment of the Preschool and School Education Act, which provides for the unification of nurseries and kindergartens under the supervision of the Ministry of Education and Science, was rejected;
- There is still a shortage of adequate and accessible services providing a favorable environment to support responsible parenting and improve the quality of care for children 0-3 years, despite the circumstance that early learning ought to be an integral part of good quality care for young children.

Data shows that fragmented early childhood education and care systems reproduce inequalities in children's access, staff qualifications and funding. For example, the share of children up to 3 years old who are included in early childhood education and care services in Bulgaria is 18.7% in 2021. This share is much lower than the target values of 33% for the EU, and for the last 5 years it hardly varies for the country; even in the municipalities with the largest scope (i.e. Gabrovo), it reaches only 23.1%, whilst in Sliven and Pazardzhik the share is solely 8.5-8.7%.

With regards to access

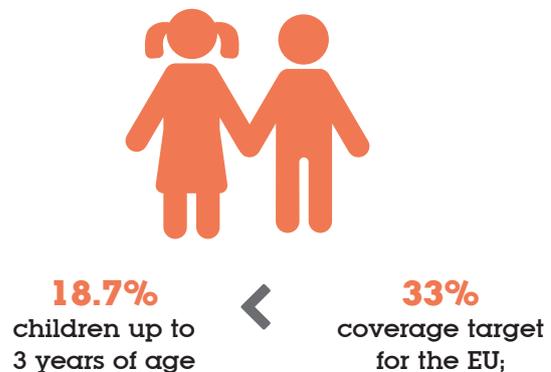
A different and uneven distribution of early childhood education and care services was found in different types of settlements, according to the place of residence of the families, their status and ethno-cultural backgrounds. There is no mechanism for assessing the needs and planning the capacity of early childhood education and care services based on data on the demographic characteristics, needs and wishes of families. The regulatory and strategic framework does not allow parents to choose different forms of services, apart from the legislated nurseries and kindergartens/schools with compulsory pre-school education groups.

Kindergartens have a normatively regulated system for increasing the qualification and professional skills of the staff in terms of support and work with children with special needs, with disabilities, of different ethnic origins, as well as in terms of supporting bilingual children and those for whom Bulgarian is not a mother tongue. There is no such regulated system for those working in nurseries.

Personnel

Normatively, within the health care system there is compliance with the recommendation for an adequate level of

Share of children included in early childhood education and care services in Bulgaria in 2021



education and qualification for early childhood education and care (level 6), pursuant to the International Standard Classification of Education (ISCED) in relation to the medical functions of the staff, yet not in relation to the education and training and care of children at the earliest age.

Curriculum

The programmatic and methodological security of the preschool education system (from 3 to 7 years) is guaranteed in the normative framework – there is an approved state educational standard for preschool education, with programmes representing a comprehensive concept of child development through different approaches and forms of pedagogical interaction.

At the same time, however, both the normative framework and practice in preschool age are in serious need of reform and rethinking, as they do not reflect modern understandings and standards of early childhood education and care. **The focus of reforms in recent years in Bulgaria has been entirely on secondary education, whilst pre-school and early childhood education continue to function within outdated paradigms. This includes fragmented learning across subject areas and too much institutionalisation. The development of the individual child's personality is not placed at the center of the process and the necessary partnership with parents and the community is completely absent.**

There is a deficit of normatively established standards and of up-to-date programmatic and methodical guidelines for working with children up to the age of three. The application of such standards and curricula for education and care in nursery groups is not regulated.

Monitoring and evaluation

Monitoring and evaluation mechanisms in kindergartens include both external and internal evaluation and opportunities for family participation. However, this information is not sufficiently shared and used at the relevant local, regional and/or national level to plan for further quality improvement of policies and practices.

No monitoring and evaluation mechanisms are prescribed in the legislation for nurseries and groups of nurseries attached to kindergartens. Unlike kindergartens, there are no statutory obligations for external or internal assessment. Monitoring and evaluation mechanisms are not implemented for a number of elements of the EU Early Childhood Education and Care Quality Framework (curricula, early childhood education and training, education, training, socialisation).

Management and financing

From a legislative and regulatory perspective, roles and responsibilities in each of the three sectors (education, health and social sphere) are separately and clearly defined. Notwithstanding, there is no policy coordination between the different management structures in each sector both horizontally and vertically, which does not ensure the necessary continuity between different types of institutions.

Our country lacks comprehensive and coherent public policies that link early childhood education and care

Early childhood intervention

In 2022, the Services for Early Childhood Development initiative continues to be implemented, with a budget amounting to BGN 77,256,145. Beneficiaries are municipalities on the territory of the Republic of Bulgaria, which received funding within the Social Inclusion Project, financed through loan funds from the International Bank for Reconstruction and Development (World Bank). The goal of the initiative is prevention of social exclusion, reduction of poverty among children through investments in early childhood development and through support for the activities of integrated social services for children from vulnerable and underserved groups. Presently, 41,403 children from 0 to 7 years of age have received support through a calendar of activities, centered on the needs of children and their families, and aimed at supporting better parenting, social activities, counseling, education, social inclusion, etc. Activities include individual and group work with children and parents with the aim of boosting kindergarten attendance; individual pedagogical support for children with disabilities; additional pedagogical training to increase children's school readiness for an equal start at school; early intervention of disabilities, direct work with disabled children and their families, including rehabilitation and counseling activities, training, mobile work with the child in their home; improving access to health care and health promotion through support for providing children's health consultation and disease prevention activities; provision of psychological support and counseling to future and current parents for the formation and development of parenting skills; family counseling and support, including work with parents and children, family planning activities, individual work; providing transport for the purpose of visiting the integrated services, kindergarten, mobile work, etc.

It is expected that after the completion of the initiative, the sustainability of early childhood development services will be ensured through funds from the state budget, following the adoption of the National Card of Social Services. At the

with other sectors concerned with the well-being of young children and their families. Budgetary coordination between the Ministry of Health and the Ministry of Education and Science regarding staff salaries and early childhood education and care policy goals is also a problem area.

There is a lack of adequate and accessible services to support responsible parenting and improve the quality of care for children 0-3 years old.

The attempts of a number of civil organizations to create a universal and complex service to support responsible parenting and quality care for children at an early age, including early learning, do not achieve the desired results. The coordination for the provision of services in the various sectors is low and there are no systematic approaches for monitoring the needs and best interests of Bulgarian parents. Inadequate parenting skills lead to neglect of children, failure to recognize the importance of early learning and development, and subsequently education, and ultimately contribute to the reproduction of the pattern of social exclusion.



41,403 children

from 0 to 7 years of age have received support through a calendar of activities, centered on the needs of children and their families

same time, the implementation of the Future for Children initiative will provide an opportunity to further develop and upgrade the activities of the Services for Early Childhood Development initiative. One of the specific goals of the new initiative is related to the provision of services for early childhood development – building parenting skills; family counseling and support; early intervention for children with disabilities and developmental difficulties. Introductory and upgrade trainings, including supervision of employees of social service providers, in relation to services for early childhood development, prevention, early intervention, etc. are further planned.

Under the Social Services Act, social services for counseling and support for parents in early childhood development and child rearing, along with disability early intervention services for children, are free of charge. In 2022, the Council of Ministers adopted a higher financial standard for social services, a day center for children with disabilities and a center for social rehabilitation and integration for children with disabilities, in which an „early intervention of disabilities“ programme is included, along with a social service center for public support/community center for children and families, in which a programme for early childhood development is implemented (Decision of the Council of Ministers No. 50 of 03.02.2022).

The early intervention services currently available in the country operate in some of the 66 Community Centers created under the Social Inclusion Project and still financed by EU structural funds. In some municipalities, early intervention services function as part of other social services, yet they are few in number. **In many cases, services are therapeutic in nature, small in scope, or fail to cover the most critical age for early intervention, namely 0 to 3 years. There is a lack of uniform standards, rules and procedures, requirements for the qualification and continuing education of specialists working in these services, as well as a lack of other mandatory compo-**

nents of any robust early childhood intervention system. The lack of systematic approach to early intervention leads to disparate services, with no possibility for tracking the quality and outcomes of the latter.

The growing understanding of the critical importance of early intervention in our society has led to the establishment, at the end of 2022, on behalf of a group of MPs, of a working meeting with the participation of experts from responsible ministries, pediatricians, and NGOs working in the field of social services and child policies.

RECOMMENDATIONS

→ Provide funding from the Ministry of Health to cover the examinations, research and hospitalisations that have been (shall be) carried out until the adoption of the Act on the State Budget for 2023;

→ Provide support and information to the medical specialists by for the due implementation of the examinations laid down in the amended Ordinance No. 26 of 2007;

→ Promote and monitor the activities of the Health Consultative Centers for Maternal and Child Health Care, in which, according to the National Programme for the Improvement of Maternal and Child Health Care, with a period up to 2030, they are expected to provide medical care for pregnant women, regardless of the latter's health insurance status.

→ Adopt a shared strategic vision at national level for early childhood development, which addresses every child from birth to compulsory school age, and emphasizes child and family-centred approaches; within this vision, early childhood education and care policies should stand as fundamental elements, since they are linked to all other areas of policy and life;

→ Establish a shared understanding of what types of services and forms the early childhood education and care system includes in Bulgaria and what their characteristics are;

→ Determine a single set of competencies that describe the requirements and expectations for those working in the early childhood education and care system – practitioners, staff, managers, including both formal criteria (educational degree, experience, additional qualifications) and informal profiling (behavior of the teacher/specialist in the study room/classroom);

→ Define and support a common understanding of the quality of early childhood education and care, incl. both structural and process elements; establish indicators that measure the most important aspects of quality with a clear distinction between measurement levels (system level / service level / teacher level). The moni-

toring and evaluation process ought to include objective methods, not just self-reporting, and encompass direct feedback from service users (namely children and families).

Additionally:

→ Create an accessible service supporting responsible parenting, the quality of care and early learning for children from 0 to 3 years;

→ Unite nurseries and kindergartens under single institutional management to achieve an effective systemic approach to quality education and care for children from 0 to 3.

→ Introduce universal screening for all children in certain age periods in order to refer to early intervention services when developmental delays and difficulties are detected;

→ Build a mechanism for referral to early childhood intervention services by health professionals and early childhood education and care services;

→ Introduce uniform standards for early childhood intervention services in order to monitor and assess results and quality of services;

→ Provide early childhood intervention services based on scientific evidence for children's learning at an early age – within the child's natural environment, through application of a family-oriented approach;

→ Devise a mechanism and structure to implement intersectoral cooperation between all bodies and experts involved in supporting the child and the family, incl. doctors, educators, early childhood development consultants and therapists at all stages – covering referral, development of a support plan, service delivery, transition to nursery and kindergarten;

→ Apply a systematic approach to early childhood intervention.



6.
CHILD HEALTH

CHILD HEALTH

AVERAGE 2.98

- lack of regional orientation of health policies to overcome strong disparities in access to health care, child mortality and vulnerability of certain groups;
- no comprehensive analysis of the needs of child health care, on which to base the task of building and operating a National Pediatric Hospital;
- no national personnel strategy aimed at overcoming the shortage of specialists, especially nurses, throughout the country;
- child healthcare is entirely based on hospital treatment and drug therapies; pre-hospital care, prevention and prophylaxis continue to represent a negligible share of investments in child healthcare.



„We need to talk more about children's mental health and to not underestimate it.“

Child Survey, 2023



„Children's health should become a priority and a personal mission for people who are elected to state institutions. Until that happens, there is no point in rendering any concrete recommendations to be ill-used for election PR and then conveniently forgotten.“

Survey, Report Card 2023

Sufficient Personnel

According to the National Center for Public Health and Analysis, the medical specialists in the country practicing an acquired degree in the field of child healthcare are, as follows:

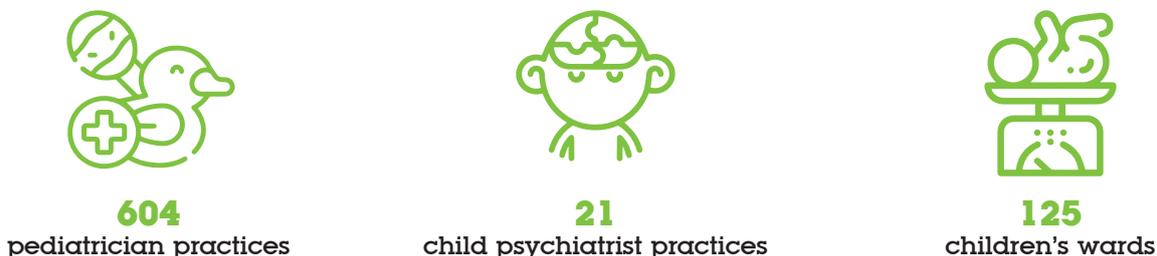
| | | | |
|-------------|--|-------------|--|
| 1618 | Pediatrics | 23 | Child psychiatry |
| 154 | Neonatology | 30 | Pediatric rheumatology |
| 13 | Pediatric gastroenterology | 59 | Pediatric surgery |
| 34 | Pediatric endocrinology and metabolic diseases | 309 | Children's dentistry |
| 64 | Pediatric cardiology | 3264 | Midwives |
| 22 | Pediatric Clinical Hematology and Oncology | 466 | Primary Health Care (for nurses, paramedics and midwives) |
| 34 | Pediatric Neurology | 19 | Consultant on maternity and newborn development issues (for nurses and midwives) |
| 13 | Pediatric Nephrology and Hemodialysis | 82 | Pediatric Health Care (for nurses and paramedics) |
| 45 | Pediatric pneumology and phthisiology | | |



It ought to be noted that most medical specialties are not profiled by age group, and doctors can treat both adult patients and patients up to 18 years of age. The situation is similar with nurses with a general profile, who possess knowledge and skills in health care, allowing them to work

in various medical structures and health facilities, regardless of the age of the patients. **Whilst specialized pediatric nurses are of utmost importance to hospital care where their shortage is critical, such specialisation is not currently offered by medical universities.**

Number of registered practices in Bulgaria



According to data obtained from the National Health Insurance Fund

Vaccine prophylaxis

In 2022, childhood vaccination coverage showed a slight upward trend compared to the observed decline during the so-called „COVID-19 period“ (2020-2021). According to data from the National Center for Public Health and Analysis, the percentage of newborns immunized against tuberculosis has remained almost the same for the last three years – about 96.5%. The explanation for this is that this vaccine is administered in the maternity hospital, 48 hours after birth. Vaccination coverage against diphtheria, tetanus and pertussis in 2022 has progressed by almost 2%, to 91.4 for 2022 and 89.5 for 2021, respectively. The same trend is observed for the remaining vaccines in the compulsory immunization schedule – against polio in 2022 91.4% of newborns are administered a vaccine (89.5% for 2021), and against Haemophilus influenzae type B the percentage of vaccinated children is 91.5% for 2022 (89.5% for 2021). The hepatitis B and pneumococcal vaccination coverage is also expected to grow by an average of 2% in 2022.

In the case of the measles, mumps and rubella vaccine, which is administered after the child is thirteen months old, the coverage in 2022 is 91.2% and only in this case there is an improvement compared to 2020, yet there is also a significant decrease compared to 2019, when coverage was 95.1%.



Coverage of vaccinated children against measles, mumps and rubella



Vaccination coverage of children as per the mandatory immunisation calendar

| 2021 | 2022 | |
|--------------|--------------|--|
| 96.7% | 96.5% | newborns immunized against tuberculosis – the largest coverage for the country; |
| 89.5% | 91.4% | vaccination coverage against diphtheria, tetanus and pertussis; |
| 89.4% | 91.4% | vaccination coverage against hepatitis B and pneumococcal disease. |



Regrettably, there is still **no progress** on the recommended human papillomavirus vaccine. Bulgaria continues to be in **one of the last places in terms of HPV vaccination** – less than 3% of 15-year-old girls are vaccinated with the HPV vaccine in our country (according to data for 2020).

Although the vaccination coverage of mandatory childhood vaccines is relatively good, the desired parameters – over 95% coverage – have not yet been reached. The main obstacles to increasing vaccine coverage are misinformation, fake news, the lack of effective national information campaigns, etc.

National General Pediatric Hospital of Bulgaria

In 2022, two governments ruled – one regular and, due to the early elections, an interim caretaker government. They are part of a series of short-lived cabinets in the past two years. The political situation remains utterly complex and the frequent change of administrations, respectively the change of the top staff of the Ministry of Health, is a serious barrier to the implementation of consistent policies.

The best that both governments could do as a first phase in 2022 was to prepare a solid project for the building and maintenance of a National General Pediatric Hospital. This didn't happen.

Despite the publicly demonstrated good intentions of both governments, the process, in addition to not achieving sustainability, became more and more opaque under the caretaker government. Public expectations were that the state would follow several steps to bring the project to its successful launch, amongst which, as follows:

- Terminate any activities related to the abandoned construction in the yard of the medical complex of the Medical University of Sofia;
- Establish a Public Council as part of a mechanism for transparency, continuity and sustainability of the project;
- Prepare a comprehensive professional analysis of the needs of child health care;
- Based on this analysis, specify the various needs, including the need for a National Pediatric Hospital;
- Based on the analysis, indicate the role and place of the National Pediatric Hospital in the context of the health care system and the system of pediatric care;
- Indicate the exact scale and stages of construction of the Hospital;
- Proceed with the specific construction task by meeting all requirements for the terrain, the building and the equipment therein, relative to the functions and role in the pre-analysis plan of the Hospital;
- Take concrete measures regarding personnel policy (pediatricians and medical specialists) in children's health-care.



With 50% of Bulgarian pediatricians in pre-retirement and retirement age and merely 15% under 35 years of age, there is already a prerequisite for an issue, and its solution is key not only for the realization of the project for a National Pediatric Hospital, but also for the implementation of children's healthcare policies at the national level.

The stages indicated hereinabove represent the mandatory prerequisites for starting a sustainable process of build-

ing a National Pediatric Hospital. As a volume of work, they could have been completed or commenced in 2022, given a clear vision of the significance of the project on the part of the government was present.

What happened in 2022:

- Any activities related to the abandoned building in the yard of the medical complex of the Medical University of Sofia were actually ceased;
- The General Directorate National Police completed an inspection and the collected materials were handed over to the Prosecutor's Office;
- The two governments held several meetings with the National Citizen Initiative „For a Real Children's Hospital“, other civic organizations and pediatricians, yet except for one such meeting during the regular government, the proactive party for these meetings was the civil sector, instead of the Ministry of Health;
- The National Citizen Initiative „For a Real Children's Hospital“ initiated dialogue with the Health Investment Company. The desire was to look for support for the project's sustainability. As of the end of 2022, it is still unclear what the role and mandate of the Health Investment Company are;
- The caretaker government commissioned an analysis and claims to be working on the project. **Unfortunately, this happens with absolutely no transparency as to what stage the analysis is at, who is preparing it, and based on what data;**
- The caretaker government also selected a site on which to build the Hospital. This choice puzzled the public and professionals, as it turned out that it was based neither on pre-analysis, nor on technical expertise, and that no opinion was sought from municipal and state institutions regarding the provision of access for ambulances, cars and public transport. The choice was again made in the conditions of complete non-transparency, demonstration of unprofessionalism and lack of responsibility towards future generations;
- In the meantime, a private investment company expressed its intention to build a private children's hospital in Sofia. The implementation of this project would put at risk access to treatment for seriously ill children, even with the currently existing utterly unfavorable conditions of children's health care in the capital.

Health resources – both pecuniary resources and personnel, and in some cases also medicinal products and consumables – are insufficient even in the richest and most well-developed health systems in Europe. The reasons are complex: the high cost of the health service, the hard and responsible work of people in the medical professions, the developing medicine and the aging population. Against this background, **Bulgaria is the EU country with the highest levels of co-payments in health care, the worst health indicators, a very high risk of personnel collapse in the nearest future, and at the same time – the highest number of hospitals and hospitalisations per population.**

The continued neglect of the National Pediatric Hospital costs the lives of many children in Bulgaria, turns many families into health emigrants or forces them to rely on the mercy of society. Child mortality in our country is more than twice the average in Europe, and Bulgaria continues to be the only country in the European Union, which does not have a national children's hospital.

What happened in 2022:

- Bulgaria still does not have a National General Pediatric Hospital as of the end of 2022;
- There is no demonstration of political will and understanding of the significance of the project on the part of the ruling party and the opposition, except on a superficial level and often in the context of political populism;
- There is no road map on how this project will develop sustainably, as part of a unifying national goal, such as children's health care;
- A Public Council was not constituted.

Fund for Treatment of Children Abroad

Activities pursuant to Ordinance No. 2 of March 27, 2019 for the medical and other services under Art. 82, Para. 1a and 3 of the Health Act and for the terms and conditions for their approval, use and payment, for persons up to the age of 18. According to data from the National Health Insurance Fund, for the period of 01.01 – 30.09.2022, a total of 1,481 applications were received for payment of medical and other services under Ordinance No. 2 for persons under the age of 18.

The orders issued by the manager of the National Health Insurance Fund for persons up to 18 years of age for the

period of 01.01.2022 – 09.30.2022 are 5.56% more compared to the same period for 2021 (1331 for 2021 and 1,405 for 2022).

As of 30.09.2022, the National Health Insurance Fund has incurred expenses for payment of medical and other services for persons up to the age of 18 in the total amount of BGN 33,073,202.35. They are allocated, as follows:

- for treatment in Bulgaria – **BGN 31,911,381.58;**
- for treatment abroad – **BGN 1,161,820.77.**

Treatment abroad

Treatment in Bulgaria

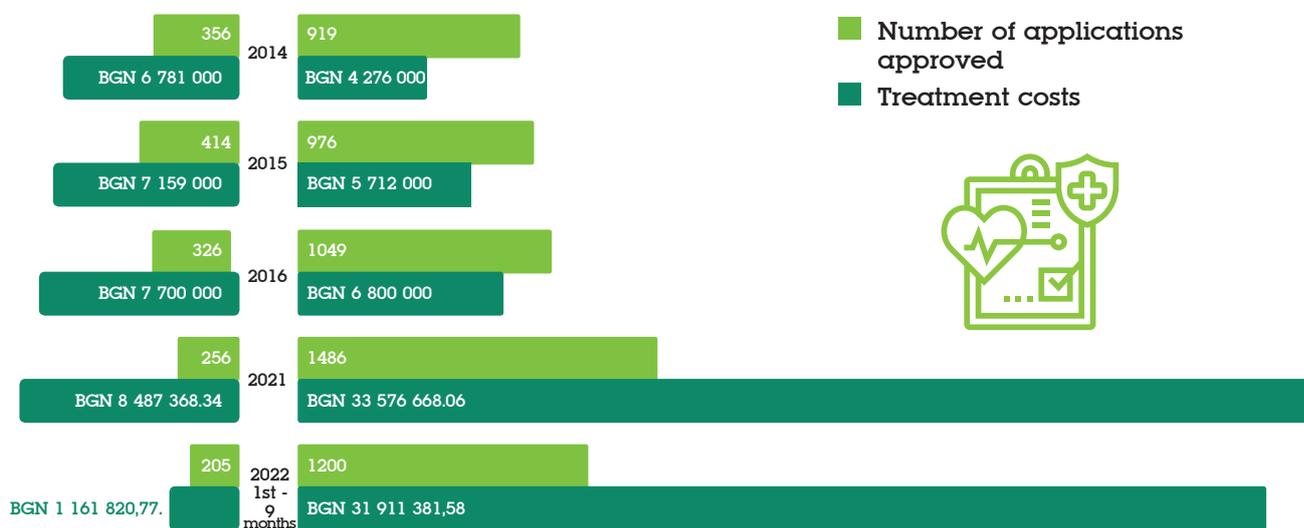


Table No. 1

| Period | Total number submitted applications | Total number of orders issued by the National Health Insurance Fund | Total number of orders for treatment of children abroad | Total number of orders for the treatment of children in Bulgaria |
|-------------------------|-------------------------------------|---|---|--|
| 01.01.2022 – 30.09.2022 | 1481 | 1405 | 205 | 1200 |

For the nine months of 2022, 174 orders were issued for the approval of payment of medical and other services in medical facilities in the following countries abroad (Table No. 2):

Table No. 2

| Country | Total number of orders in period, with approved treatment | Total number of orders for the approval of medical and other services under Ordinance No. 2 directed to a commission for issuing forms S2 |
|---------------|---|---|
| Austria | 37 | 130 |
| Belgium | 13 | |
| Great Britain | 4 | |
| Germany | 77 | |
| Israel | 2 | |
| Italy | 7 | |
| Serbia | 2 | |
| Turkey | 4 | |
| France | 12 | |
| Croatia | 3 | |
| Switzerland | 13 | |

Child Mortality

The data for 2021 indicate that the trend of reducing child mortality levels in the country is changing. The rate is 5.6 per 1,000 live births, thus returning to the levels of 2019. In 2020, it was 5.1‰. In absolute terms, this means 326 deceased children under the age of 1, with 301 in 2020 and 342 in 2019.



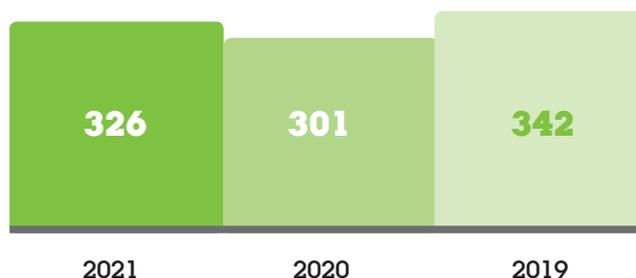
This year Bulgaria is the country in the EU with the highest rate of child mortality

The increase in child mortality is entirely due to the deterioration of the situation in rural communities. The trend for the infant mortality rate to be significantly higher in villages than in cities is persistent, with the proportion of deaths in the follow-up group in villages being almost double that in cities in 2021 – 8.7‰ versus 4.5‰.

The perinatal infant mortality rate in 2021 also saw a noticeable increase, reaching 8.8 per 1,000 live births, compared to 7.9 in 2020 and 7.8 in 2019.

In 2021, the levels of neonatal and post-neonatal child mortality trend for 2020 are continued, respectively 3.1‰ for neonatal mortality and 2.4 ‰ for post-neonatal mortality.

Deceased children under the age of 1 year



The stillbirth rate rose to 6.7‰ (per 1,000 live births), with a rate of 5.9‰ in the previous year and 6.1‰ in 2019.

The trend in the causes of mortality in children under 1 year in 2020 remains unchanged. Over 90% of deaths in this age group are due to 6 classes of diseases. Deaths due to conditions detectable during pregnancy predominate – 134 children died due to “conditions occurring during the perinatal period”, with another 59 having “congenital

anomalies, deformities and chromosomal aberrations” listed as causes of death.

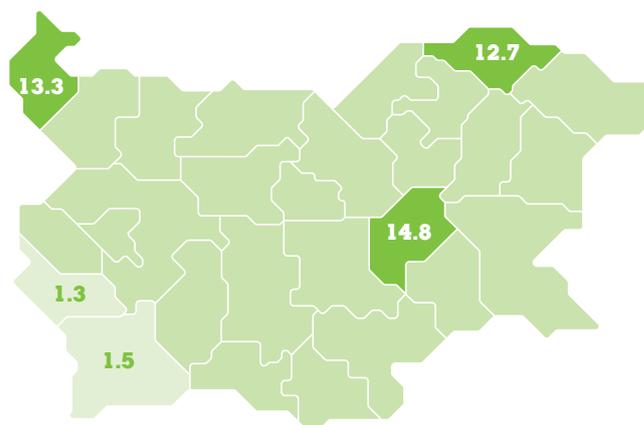
Other significant causes of child mortality include diseases of the respiratory system (34) and diseases of the circulatory system. It is noteworthy that the absolute number of children who died from circulatory diseases in 2021 was almost twice as many – 35 compared to 2020, when they were 19.

In a regional aspect, in 2021 districts with a child mortality rate permanently below the national average remain twelve, the lowest being in Kjustendil District – 1.3‰ and Blagoevgrad District – 1.5‰.

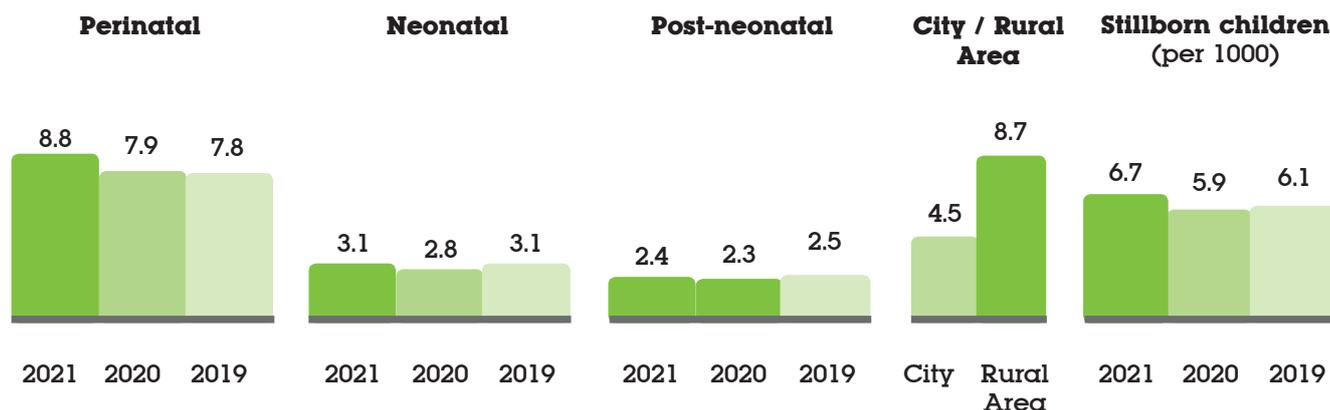
The highest value of the child mortality rate was registered in the districts of Sliven (14.8‰), Vidin (13.3‰) and Silistra (12.7‰).

In 2021, the level of mortality among children by age group remained unchanged, respectively 0.2‰ for ages 1-9 and 0.3‰ for ages 10-19.

Highest and lowest rates of child mortality by district



Infant mortality rate (per 1,000 live births)



Children’s use of narcotic substances and measures to limit access to the latter

According to an Annual Report on the problems related to drugs and drug addiction in Bulgaria cited in the Bulgarian version of the Report Card, in the last year there has been a decrease in the use of drugs by high school students. **According to analysts, this is due to a decrease in the use of marijuana (by nearly 9 percentage points compared to the previous national survey of students conducted in 2017), which still remains the most used drug by students (grades 8-12).** Another reason for the decrease in the use of cannabis is the increasing supply of other smoking products, **such as electronic cigarettes, tobacco heating devices, and waterpipes.**



In the last two years, the use of Nitrous oxide, commonly known as laughing gas (“paradise gas” in Bulgarian), mainly in balloons, including by minors, has been particularly popular in places of entertainment.

The second most used group of narcotic substances is that of stimulants. In 2022, the starting average age of drug use among students is 14-16, which marks a slight increase in age compared to last year.



14 years of age

first use of opioids, inhalants and cannabis;



15 years of age

first use of synthetic cannabinoids and hallucinogens



16 years of age

first use of stimulants (cocaine, amphetamines, methamphetamines and ecstasy)

Registered cases of acute intoxications in age groups up to 15 years



803 children

107 use of narcotic substances

582 use of alcohol

114 combined use of alcohol and drugs.

The earliest age of first use was observed for the use of opioids, inhalants and cannabis – 14 years, and for synthetic cannabinoids and hallucinogens it was 15 years. The average earliest age of first use of stimulants (cocaine, amphetamines, methamphetamines and ecstasy) was 16 years. For the second year in a row, activities are being implemented in the country under the two National Prevention Programmes (for grades 5-7, resp. grades 8-11). The

implementation of the activities is supported by the development of the *Guidelines for National Programmes for the Prevention of the Use of Narcotic Substances in a School Environment for Age Groups 5-7 Grades and 8-11 Grades*.

Regrettably, there remains a persistent trend in the country of not implementing sustainable prevention programmes which can be effectively monitored and evaluated.



The lack of programmes for indicative prevention, combined with the lack of programmes for treatment and rehabilitation of children and youth, is a major problem in the system of providing services and care for young people and should become a priority in the development of policies in the field of addictions.

For another year, the lack of programmes to work with parents, as well as programmes aimed at socially excluded and hard-to-reach underserved communities, is also glaring.



11.2%

of students consider that regular smoking of cannabis does not pose any health risks



16.9%

of students consider that regular waterpipe smoking does not pose any health risks.



3.4%

of students determine the regular use of cocaine as risk-free



25.2%

of students approve of cannabis smoking, whilst for 4.7% this is true regardless of the quantity;

According to data from the National Center for Public Health.

Smoking and waterpipe use among children

„Smoking in school and early youth age continues to be a serious public health problem in Bulgaria. The prevalence and intensity of smoking, especially among girls, experimentation with new tobacco products and their continued subsequent use indicate an alarming development of this problem in our country,“ conclude the authors of the National Survey of Health Risk Factors, within the section „Prevalence of smoking among the population aged 10-19 in the Republic of Bulgaria“ – Elena Teolova, Galya Tsoolova, Prof. Plamen Dimitrov from the National Center for Public Health and Analysis.

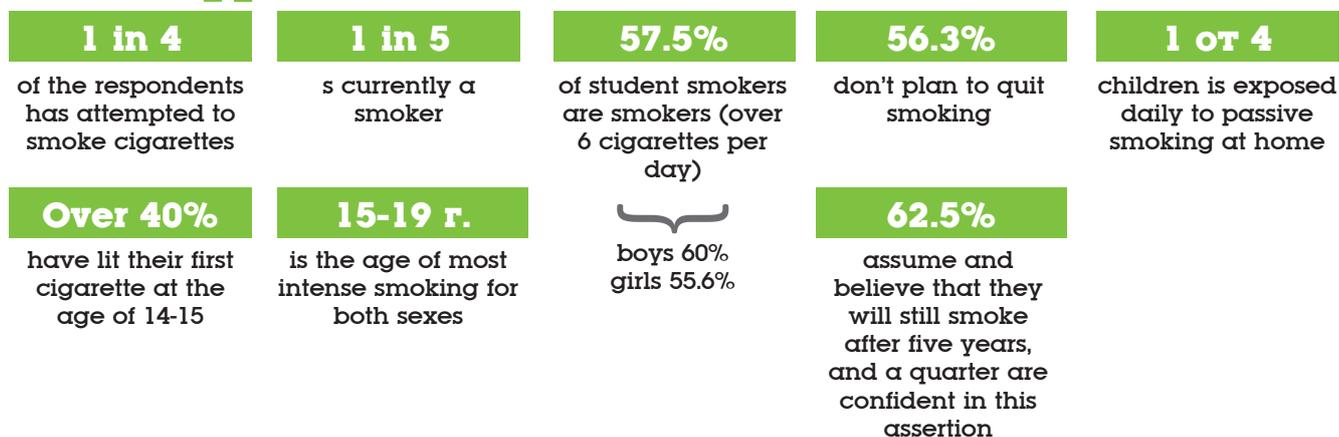
The study is rather thorough and provides an in-depth analysis of the prevalence of smoking and its causes among adolescents. The data from this study were elaborated on in Report Card 2022, so we shall quote only some of them herein.

- Almost every fourth respondent has tried smoking cigarettes, with an almost equal share of boys and girls. One in ten is aged 10-14, and less than half – aged 15-19. Over 40% of students lit their first cigarette at the age of 14-15;
- Almost every fifth child (16.9%) is a current smoker, with no significant gender difference;
- 57.5% of children are heavy smokers (more than 6 cigarettes per day), with the share of boys being higher than that of girls (respectively 60% vs. 55.6%);
- Heavy smoking in both sexes is more prevalent in the 15-19 age group;
- Less than a third of the surveyed student smokers have a desire to quit smoking. More than half of them (56.3%) do not plan to give up. 62.5% of students assume and believe that they will still smoke after five years, and a quarter are confident in this assertion;
- Almost one in four of all children were exposed to passive smoking in their home on a daily basis.

The conclusion is categorical: “Regardless of the number of favorable legislative changes, the obtained data are indisputable evidence that childhood smoking continues to be a serious and priority public health problem. The issue of developing and implementing qualitatively new approaches in the prevention of smoking in childhood, aimed at preventing the initial use of cigarettes or the maximum delay in quitting, and at provision of help and support for smokers who wish to quit, remains pending. All this necessitates the development and implementation of preventive programmes at primary school age and the adaptation of innovative age-adapted intervention programmes.”

The Ministry of Health reports: “A total of 23 campaigns with 11 mass events and 37 events to mark world, international and thematic days and holidays were organized and carried out for the period under the “Reducing Smoking” priority theme. These encompass, as follows: 14 TV and radio broadcasts; 310 audio and video shows; 33 materials published in the press, 74 materials published on the Internet; 350 lectures and talks; 16 seminars, 124 trainings, 137 discussions, individual trainings and consultations. Two studies were conducted with 553 participants. Health and educational materials (leaflets, posters, stickers, calendars, etc.) have been developed and printed,” which in itself sounds convincing.

In 2022, the Council of Ministers approved the Draft National Health Strategy 2030 and submitted it for adoption to the National Assembly on 21.10.2022. The project was divided into 7 committees. At the meeting of the Health Commission on 19.01.2023, after a plethora of negative statements was rendered, the National Health Strategy was not adopted. The Ministry of Health should revise it and resubmit it to the National Assembly, as it is one of the documents required under the Bulgarian Recovery and Resilience Plan.



Gambling and gaming addiction

In December 2022, the National Network for Children and Association Parents sent out a letter to the President, Council of Ministers, chairpersons of parliamentary committees and responsible institutions regarding the need for swiftly adopting measures to regulate media content related to gambling and its advertising among children.

The advertising of gambling and betting during the World Cup of 2022 was unprecedented, raising a number of questions concerning the high risks to children. The total refusal of the institutions to implement even the minimum restrictive measures provided for in the Act on Gambling gives room for gambling to become a real epidemic amongst teenagers.

Despite the explicit legal ban on advertising, the largest and most prominent advertisers in the gambling industry promote their brands in advertising spots on television, radio and the Internet during hours that are fully accessible to people under 18 years of age. Popular figures and influencers are used to attract the young audience and lure young people to the platforms for online betting, to online casinos and other games of chance. This occurs within a context of constant advertising of gambling and sports betting, which leads to absurd situations where sports children wear kits with advertising of online betting platforms.

The current situation further constitutes **a clear violation of Art. 10, Para. 1 of the Act on Gambling, which prohibits the direct advertising of gambling games aimed at minors, as well as the sending of unsolicited electronic messages to an unlimited number of persons containing information about gambling games.** The provisions of the Broadcasting Act and the *Code of Conduct regarding Measures to Assess, Label and Restrict Access to Broadcasts Unfavorable or Contributing to a Risk of Harm to the Physical, Mental, Moral and/or Social Development of Children* are also breached. Pursuant to them, **media service providers must not allow gambling to be presented as a suitable means of easy money acquisition, as this could mislead the young audience and lead to addiction.**

Healthy eating

Children 0-3 years

According to the report of the Trust for Social Alternative titled "Full Care in Early Childhood: Challenges at System Level and Possible Solutions", among the main reasons why Bulgarian children from 0 to 3 years old are undernourished include, as follows: inadequate care and feeding practices, inadequate dietary intake and household food insecurity. Due to inadequate care and feeding practices, there is late initiation of breastfeeding, low iron intake, low consumption of fish, vegetables and fruits, etc.

The findings of the cited report show that household food insecurity is related to the mother's age, her level of edu-



3 million people

gamble in Bulgaria



300 000

play games of chance regularly



86% of whom

have never won anything whatsoever

The gambling addiction is an internationally recognized medical condition described in ICD-10 (International Statistical Classification of Diseases and Related Health Problems), and gambling advertisements pose an additional risk. Research by the Bulgarian Gallup Agency indicates that **about 3 million people gamble in Bulgaria, and about 300,000 of them play games of chance regularly, although 86% of gamblers have never won anything whatsoever.** Gambling expenses vary between 15 and 43 BGN per person per month, with the **total spending on games of chance being close to half a billion BGN per year.**

Due to the lack of political will and vested interests from various parties, including media and business ones, as well as the failure of the 48th National Assembly to produce a regular government and the Assembly's untimely dissolution, no progress was made on the subject as of the end of 2022.

Disabilities and insufficient financial resources are factors that determine and influence the food diversity in children's menus. There are some forms of organized nutrition throughout the country, such as the Children's Nutrition Complex, children's kitchens for nurseries and kindergartens, and kitchens for social services, yet they cannot fulfill the task of simultaneously building parenting skills and providing nutritional assistance. Families located in segregated and isolated areas have limited access to such services, so the number of malnourished children there is substantial (47.2% of children of Roma ethnic origin do not receive at least one meal a day that includes meat, fish or chicken). Additional factors such as insufficient informa-

tion, support from medical professionals, as well as societal attitudes interfere with the existing patterns of nutrition for children from these families. A national nutrition policy covering long-term sustainable solutions is urgently needed.

In 2022, no improvements and changes related to the healthy nutrition of children at school are considered. There is still a lack of an up-to-date legislation regulating the healthy nutrition of children in schools, as well as an updated recipe book.

Children in schools

The feeding of children in schools is regulated by Ordinance No. 37 issued by the Ministry of Health on the Healthy Nutrition of Students (first adopted in 2009). This Ordinance has not been updated for almost 15 years and does not reflect in any way the latest requirements of Ordinance No. 1 on Physiological Norms for Feeding the Population. Although there are no specific instructions in the Ordinance for the creation of a recipe book, it is still possible to find on the book market "Collection of Recipes for School Canteens", published in 2012, which continues to be used despite its obsolescence.

Reimbursement of foods for special medical needs



Dietary foods for special medical purposes for home treatment, which many children need, including those for enteral administration, as well as some foods for rare diseases, are currently not covered by the National Health Insurance Fund for all diseases. This places hundreds of people in a situation where they rely solely on their own or donated funds to procure vital medical food for their children and loved ones.

These issues have been present for years. In 2022, the National Network for Children, the „Community Bridges“ Association, doctors, parents and civil organizations once again called for urgent action to ensure access to food for special medical purposes to children and adults who need it. The NNC participates in the working groups created at its insistence and requested that the Ministry of Health implemented a series of measures to ensure access to medical foods for children and adults. The proposed solutions were addressed in an open letter to the institutions for emergency measures on access to food for medical use.

Among the main problems due to which patients go by without medical food are the wide range of diagnoses that lead to a state of inability to take food in the ordinary way (resulting in malnutrition), lack of regulated disease codes in the disease register and the need to update the list of dietary foods for special medical purposes, paid in full or in part by the National Health Insurance Fund. Even for the diseases approved in it, there is currently **no liquid form of food**, which for some diseases is most suitable for use

The issue of who should actually prepare and distribute the recipe book also applies, and the Ministry of Health (in particular the National Center for Health Information) should issue and make freely available an up-to-date compendium of recipes for school canteens.

Feeding children with special nutritional needs

According to data from the European Federation of Associations of Patients with Allergies and Respiratory Diseases (EFA), as of 2019 in the European Union, about 17 million people suffer from food allergies and intolerances. 3.5 million of them are under the age of 25. The number of children with food allergies and intolerances in Bulgaria is also growing. However, specific studies and up-to-date statistics of affected children are lacking. There are also no guidelines – an ordinance and a special recipe book – regulating the feeding of these children in kindergartens and schools and, accordingly, facilitating the staff in providing adequate care for children with special nutritional needs. We have no indications that this issue is being actively worked on in the Ministry of Health and that there are prospects of it being solved timely.

and is often recommended by the supervising gastroenterologists.

Caring for patient nutrition is a basic human right, confirmed by the International Declaration adopted by the International Societies of Clinical Nutrition and Metabolism (ESPEN, ASPEN, FELANPE, PENSA) – organizations with thousands of members worldwide – in 2022. The European Society of Pediatrics Gastroenterology, Hepatology and Nutrition and the Chairman of the Nutrition Committee of the German Society for Pediatric and Adult Medicine also supported the patients' right in letters to the Bulgarian Ministry of Health dated August 2022. Later in the year, an Action Plan for the ESPEN International Declaration was also adopted.

The official position of the Bulgarian Society of Pediatric Gastroenterology, Hepatology and Nutrition categorically states that with the application of enteral foods, the costs of the health system for the care of children are significantly reduced, since their timely and correct use prevents complications in patients who need it. Oftentimes, patients enter medical facilities just to be fed, as the food they need is provided through a clinical pathway (CPW), yet not for home treatment.

Currently, the National Health Insurance Fund reimburses food for home use only for a few types of diseases. Official positions rendered by five expert councils to the Ministry of Health show that those suffering from a disease from the over 100 other types which lead to a need for medical nutrition, do not have access to such assistance at all, and it is recommended that they are **added to the list for reimbursement of dietary foods for special medical purposes for home treatment**.

The Supervisory Board of the National Health Insurance Fund is the body that has the administrative authority and mechanism to provide food to patients by imple-

menting the procedure for updating the disease and food lists. The National Health Insurance Fund received information from the working group of the Ministry of Health already at the beginning of December 2022, yet so far no actions have been taken to update and supplement the list of diseases for which the state reimburses food for home treatment.

The recommendations, prepared with the joint work of doctors, other experts and relevant parties, which the Network renders so as to help solve the problem of access to dietary foods for special medical purposes, encompass the following:

- **Add the codes for malnutrition as a main or additional code to the main disease to the list of diseases for which the National Health Insurance Fund reimburses dietary food for special medical purposes for home treatment – pursuant to ICD-10, these are codes E43, E44 and E46.** Some of the diseases that lead secondarily to conditions related to the need for the use of medical food are rare and it is not efficient to administratively go through the entire procedure of entering each of the diseases with distinct codes, solely for the latter to be used by several patients;
- **Update the List of dietary foods for special medical purposes, paid in full or in part by the National Health Insurance Fund.** In this list, the codes for malnu-

trition should be added and to them, according to the specific physiological needs of the patient, the corresponding type of medical food should be written, both in powder and liquid form, with the subtypes covering all age groups.

- **Prepare a financial estimate of the number of patients in need of food.**
- **As soon as possible, announce a contract with the manufacturing companies for the supply of medical food, including liquid forms, according to the updated list.**
- **Begin maintaining a register of patients in Bulgaria who need dietary foods for special medical purposes.**



Whilst the NNC's team is advocating for systemic solutions to this issue, through NNC campaigns, and in partnership with businesses and individual donors, medical food worth over BGN 16,000 was provided to children in need.

Utilizing a comprehensive model of employing and supporting health mediators as a prerequisite for improving access to health care for vulnerable groups

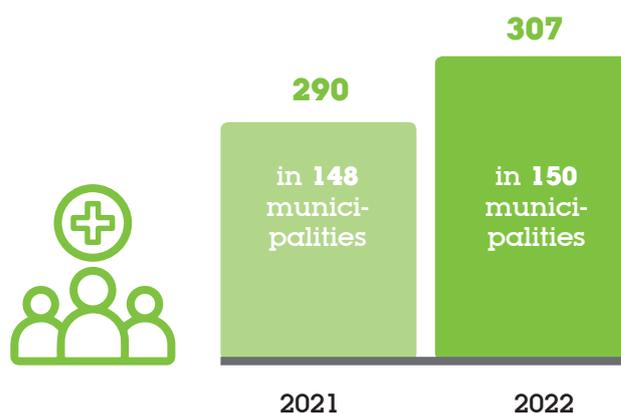
In 2022, the Ministry of Health decided to fund 17 new jobs for health mediators. Thus, after in 2021 there were 290 health mediators in 148 municipalities, in 2022 their number increased to 307 in 150 municipalities.

Health mediators are employed by municipalities through a delegated budget and serve neighborhoods and/or settlements where vulnerable communities live. Health mediators speak the language of the community (most often Roma or Turkish), undergo a transparent selection procedure and training at a medical university to acquire a professional qualification. Since 2019, their activity has been included in the Act on Health (Art. 29), and in 2020 the Ministry of Health adopted the special Ordinance No. 1 on the Requirements for the Activity of Health Mediators.

In an attempt to address the matter of how to reduce the turnover among health mediators, to compensate them for the constantly increasing demands and tasks and to increase their motivation to work, in the month of April 2022 the state adopted an update of their remuneration. Until now, they were employed on minimum wage. Unfortunately, despite the numerous letters sent out by the Ministry of Finance and negotiations held, quite a few municipalities unilaterally refused to increase the salaries of the mediators.

At the end of 2022, on the initiative of the Parliamentary Committee on Health, two workshops were held with a focus on health mediation, and on challenges and op-

Working health mediators in the country



portunities for improving the situation of those working in the field. The question of guaranteeing a decent salary for health mediators was raised again, yet at the moment it remains unclear how visibility can be ensured for the decisions of the municipalities whether and to what extent they comply with the financial frameworks set through the delegated budget. In the current situation, each case of a health mediator who has not received an update of their salary has to be considered individually, which requires a huge amount of time and human resources.

RECOMMENDATIONS

- Ensure transparency of the planning and implementation of all activities related to the National Pediatric Hospital;
 - Adopt and follow a systematic and sustainable approach and a road map for the implementation of the project for the National Pediatric Hospital from the pre-analysis to the very start of its functioning;
 - Establish a Public Council with a large representation of experts, civil organizations and public figures enjoying high trust in society.
 - Child mortality data in 2021 needs a thorough analysis in the context of previous years and the particularities of the COVID-19 pandemic;
 - The quantitative data currently contained within the reports of the National Center for Health Information have not been analyzed and cannot, in this form, serve as a basis for political decisions and public policies aimed at reducing child mortality;
 - The need to improve access to evidence-based prenatal and perinatal care for the prevention of diseases and conditions occurring during pregnancy that lead to early death or disability remains present;
 - The need for measures to overcome regional disparities is increasing, as **child mortality rates in various regions have reached differences of more than tenfold.**
 - Preventive activities should be included in programmes for working with children in early childhood;
 - Ensure the functioning of specialized and free integrated health and social services for children abusing narcotic substances;
 - Ensure the operation of accessible and free services for counseling and guidance of parents on addiction issues, incl. opportunities for telephone and online counseling by a specialist;
 - Ensure the functioning of programmes for the prevention of the use of narcotic substances in hard-to-reach communities and/or communities at risk of social exclusion.
 - Limiting smoking among the younger generation should become a state priority;
 - Provide relevant structural, personnel and financial conditions for this priority;
 - Encourage interdepartmental dialogue in this direction, as well as broad dialogue with non-governmental organizations;
 - Relations with the tobacco industry should take place under the transparent conditions defined in Art. 5.3. of the World Health Organization Framework Convention on Tobacco Control;
 - Adopt legal measures to denormalize smoking – ban on advertising of tobacco products and sponsorship by tobacco companies, ensuring a real environment without smoke and nicotine fumes, vigorous increase of excise duty – for all tobacco and nicotine products, as per all the requirements of the Framework Convention;
 - Render support to the “Tobacco-free generation in Bulgaria – 2030” movement;
 - Sign and distribute the European citizens’ petition “Call for a tobacco-free environment and the first European generation without tobacco – 2030” – www.tfe-bg.ensp.network or <https://eci.ec.europa.eu/029/public/#/screen/home>
- 

→ In order to report real progress in the healthy nutrition of children in kindergartens and schools, several specific steps are needed on behalf of the Ministry of Health:

- Update Ordinance No. 37 on Healthy Nutrition for Students;
- Update and publish, with guaranteed free electronic access, the „Collection of Recipes for School Canteens“;
- Issue an ordinance and a special formulary – regulating the feeding of children with special nutritional needs (with allergies and food intolerances);
- Ensure a new circulation or free access to the compendium „Collection of Recipes and Guideline for Healthy Eating for Children from 3 to 7 years of age“, edition 2020;
- Introduce a national specialized nutrition program for pregnant women, nursing mothers and children from 0 to 3 years of age;
- Inform, consult and support with food products and supplements all families with children living below the poverty line.

→ Initiate a dialogue between the Ministry of Health and the Ministry of Labor and Social Policy to recognize the work of the health mediator as an „integrated“ health and social service;

→ Provide health mediators with opportunities for continuing training that affects the social profile of their work;

→ The Ministry of Health ought to develop a mechanism for working in crisis situations, in which health mediators should be included. The COVID-19 pandemic has shown the need for such a mechanism, as municipalities do not always have the necessary information and knowledge to fully utilize health mediators to manage situations involving a high risk to public health.



7.
EDUCATION

EDUCATION

AVERAGE 3.40

- lack of understanding and analysis of the causes of the strong inequalities in Bulgarian education, and poor management of the processes leading to them;
- lack of real inclusion of all children according to their specific individual needs;
- lack of support from other systems, such as the social and child protection system, for educational institutions to work with families and children with special needs;
- lack of quality integration of various interdisciplinary subjects such as digital media literacy, health and sexuality education within the general school curriculum.



„I would recommend making the lessons more interesting and easier for the children to understand. Teachers do not always make an effort to present the lesson in an understandable and engaging way.“

Child Survey, 2023



“The main issue in education is that it lacks a child-centered model; currently all children are a product of education, not its goal! Education places all children within a single framework, which is equally bad for children with special needs and for gifted children. The practice of children seeking help and tutoring outside of school has skyrocketed, which indicates that the school is not adequate to the children's needs! A rather large number of children cannot cope with the mandatory National External Assessments and Matriculations without the help of tuition, which is, regrettably, not available to all families, and it is not fair to have these exams covered thanks to the efforts and funds invested outside of schools! We have a huge problem in education and urgently need a comprehensive reform of the current model, which produces “functionally illiterate” children!”

Survey, Report Card 2023

Ensuring equal access to quality preschool and school education for all children. Dropout prevention and sustainability of coverage in compulsory education

In the field of education, 2022 was marked by a kind of watershed – until the fall of the regular government, numerous requests for significant reforms, including in secondary education, were declared, and the topics were the most diverse – from a change in the starting date of the school year and the structure of vacations to the introduction of a system for independent and objective assessment of the added value of education in each school. However, after the middle of the year, the transition back to a caretaker cabinet froze the debates and strongly formalized the implementation of the major goals that the Ministry of Education and Science had set for itself, down to the administrative implementation and application of various programmes. At the same time, however, key policies implemented through the national programmes were at risk of disruption due to the initial delay in the publica-

tion of the programmes and the reluctance of the Ministry of Education and Science to seek sustainability for them.

As a result, educational differences and segregation become deeper, and the success of children in school continued to be directly related to the place of residence and the socio-economic status of the families. According to a report issued by the Trust for a Social Alternative, *„Despite the right to free education and the obligation of institutions and parents to ensure the attendance of preschool and school education for every child from 4 to 16 years of age, families are forced to cover many „hidden“ educational costs themselves. Examples of this include the provision of textbooks and meals for students, as well as the payment of transport to and from school from the 7th grade onwards. If these costs cannot be covered, children's access and full participation in the educational process is categorically blocked or limited.“*

At the very beginning of 2023, changes to the Preschool and School Education Act were adopted, which made textbooks for all students up to 12th grade free, which is certainly a step forward, yet the question remains of whether access to a textbook in itself is a measure of mastering the material in it. There are examples of stratification in levels of education and quality of access at all levels. For instance, according to an analysis of the results of the National External Assessment in Mathematics carried out by the Open Data Portal, in 1036 of the 1737 schools (or in 60%) which conducted the relevant assessment, students received below 30 points, which equates to the lowest grade – Poor (2). Approximately 40% of 7th graders in the country study in these schools. These data are also confirmed by the Institute for Market Economy, which calculates that 7th graders in 181 municipalities, or in nearly 70% of Bulgarian municipalities, have received Poor (2) in mathematics.

The Institute for Market Economy concludes that these data „speak for an extreme concentration of quality teaching in mathematics (and exact sciences in general) in a very small number of elite schools that achieve very high results... Outside of them, however, the quality drops very sharply, and from there decreases the number of students who are subsequently able to continue their education in a direction that requires more serious training in mathematics. From the point of view of economic development, this circumstance hinders the development potential of a number of industries.“ The performance in the National External Assessment in Bulgarian Language and Literature, although slightly better, is not encouraging and also proves the tendency of the educational divide growing larger. There are no clear plans for what the Ministry envisages for those children who have failed the external assessment and for how they will proceed with their education in high school.

The desegregation policies that municipalities have to implement are in most cases ineffective or simply absent. This is also confirmed by the data of the Center for Educational Integration of Children and Students from Ethnic Minorities, according to which, **under the National Programme „Supporting Municipalities to Implement Activities for Educational Desegregation and for Prevention of Secondary Segregation“, for the academic year of 2021/2022, contracts were concluded with only 9 municipalities.** In certain cases, there is a tendency to com-

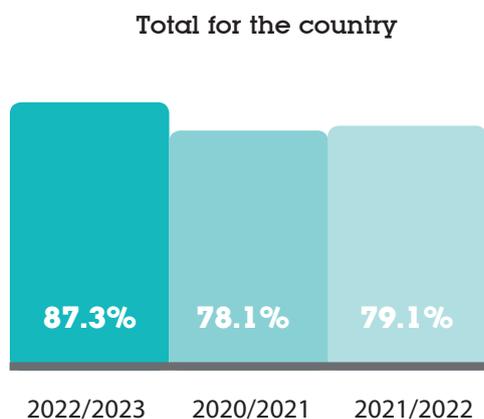
promise progress already achieved, traced in the decision of individual municipalities, including the Sofia Municipality, to allow the transformation of primary schools in segregated neighborhoods into unified ones – that is, in practice, to cement segregation in them by detaining students until 10th grade, the end of compulsory education, when the probability of students continuing their education in another school and leaving their environment is minimal.

Against this background, however, the Ministry of Education and Science is suspending the national programme supporting the appointment of educational mediators and *de facto* discontinuing the extremely successful practices of supporting vulnerable groups, especially in schools with a mixed ethnic composition and small schools that do not have sufficient budgetary means, by covering the costs of maintenance of one or more mediators.

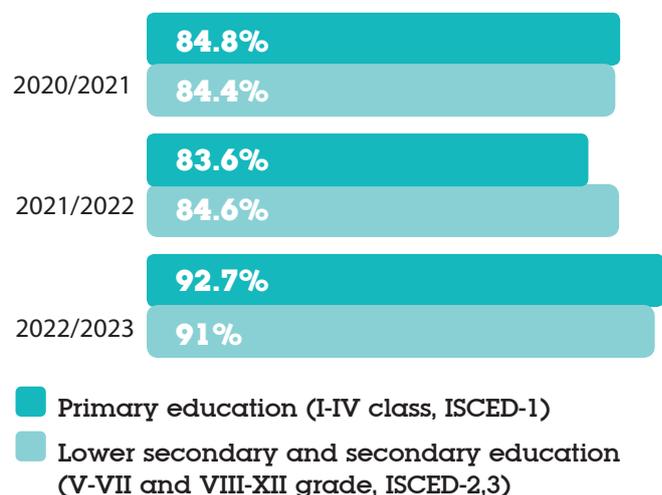
The open reluctance of the Ministry of Education and Science to engage with topics such as the integration of children with disabilities is also shocking – an issue on which there has been no development in the past year. In the Ministry’s response to the Ombudswoman’s question, „How many children with disabilities are outside the education system and how are they dealt with?“, the Ministry simply stated, **„The matter is beyond the competence of the Ministry of Education and Science.“** According to a response under the Act on Access to Public Information sent out to the NNC in the course of preparation of the present Report, **the National Electronic Information System for Preschool and School Education does not contain data on students at risk of dropping out.** From responses presented in such fashion, it becomes clear that the Ministry prefers to distance itself from the policies towards different groups of children at risk, rather than actually supporting their full inclusion in the education system.

Access to pre-school education is not equally guaranteed for all children in the country, and the provision of places is still a major issue in large cities. In 2023, authorities have a deadline to fulfill the commitment to guarantee pre-school education to all 4-year-olds, for whom this degree is now compulsory. In small settlements, an issue is the absence of appropriate alternative services, as until now access issues were solved solely through opening preparatory groups to schools. For 4-year-olds, however, this solution would be unacceptable.

Group net enrollment rate of children in kindergarten by regions (NSI)



Group net enrollment rate of the population by level of education (NSI)



According to data from the Information System for the Implementation of the Mechanism for Joint Work of the Institutions to Cover and Prevent the Dropout from the Education System of Children and Students of Compulsory Preschool and School Age, at the beginning of the 2022/2023 school year, children who dropped out of the education system and pupils of compulsory school age amount to 53,464. For 39,653 of the dropouts, the outreach teams received information that the families have gone abroad. It is not clear whether the Ministry of Education and Science is abdicating its responsibility to track what happens to the children who have gone abroad and whether the information regarding them is reliable.

More effective school teachers. Successful school management and development

Political will and (un)fulfilled plans

Good school management and increasing the effectiveness of teachers in Bulgarian schools are seriously advocated as a commitment of the Ministry of Education and Science in the goals and activities of the Strategic Framework for the Development of Education, Training and Learning in the Republic of Bulgaria (2021-2030). However, the Action Plan until 2024 for the Strategic Framework is delayed and is still in the process of being finalized, and according to data from the Ministry of Education and Science in response to an inquiry on behalf of the NNC, the decision to adopt the Plan is yet to be submitted to the Council of Ministers. Notwithstanding, a concrete deadline has not been specified.

Selection, certification and leadership training of school principals

Changes in the conditions for holding contests for the selection of school principals were regulated in Ordinance No. 16 of the Ministry of Education and Culture of July 1, 2022 for holding contests for the position of „principal“ in state and municipal institutions in the system of preschool and school education. These amendments are on a par with the philosophy of the Strategic Framework for the Development of Education, Training and Learning in the Republic of Bulgaria (2021-2030), and implement one of its key measures, namely „the introduction of a competency model with a focus on key competencies and leadership skills in competitions for selection of principals“.

At the same time, according to a report issued by the Ministry of Education and Science, as of February 2023, more than 20% of schools in Bulgaria are managed by an acting principal and await the announcement of principal selections. The principals of more than 100 other schools, or nearly 5%, will reach retirement age in 2023.

Road map and challenges in the development of quality pedagogical personnel

In 2022, in 23 regions of the country, teacher salaries are above the average income for the respective region, and the number of those wishing to study pedagogical specialties continues to increase. However, the problem of access to well-prepared, motivated and effective teachers remains unsolved. The pitfalls in training more pedagogues than the educational system needs are elaborated on by P. Ivanov from “Teach for Bulgaria” in the article: “How does the number of pedagogues in the country affect the quality

The returned and detained children and students in the system until the beginning of the second term of the academic year 2021/22 are 11,544. During the current academic year, 10,180 children and students were enrolled and detained, who in the second term of 2021/22 were not in the education system. Monitoring of the data under the Mechanism shows a **permanent trend of return and coverage of approximately the same number of children – about 10,000, which, however, does not lead to sustainable changes in the percentage of early school leavers – 12.2% for 2021, and in the drastic disparities between urban and rural areas.**



More than 20%

of schools in Bulgaria are managed by an acting principal and await the announcement of principal elections

In more than 100 schools (5%)

The principals will reach retirement age in 2023

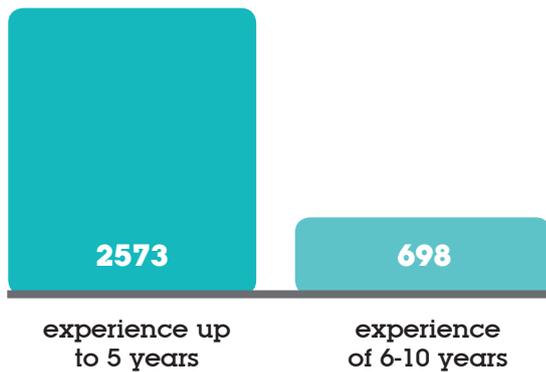
of education?” He points out the risks associated with an oversaturation of some and a shortage of other pedagogical specialties, as well as with the dropout of a large part of newly appointed teachers.

At the national level, there are still no policies and mechanisms for mentoring new teachers, who in most cases enter the profession with ideas starkly different from the reality in school. In an analysis of the situation, prepared by experts of the World Bank as part of the Roadmap, it is stated that in 2019 there were 2,573 teachers with an experience of up to 5 years who left their jobs. For comparison's sake, the number of teachers with 6-10 years of experience who left is significantly lower – 698 (p. 107). This once again emphasizes the urgent need for a system of support, mentoring and additional training for newly appointed teachers, which ought to define the volume of activities in the introductory qualification of newly appointed teachers (pursuant to the current provision of Art. 45, Para. 1 of Ordinance 15 of July 22, 2019), upgrade the latter, set quality indicators and increase the period from 2 months to a minimum of 2 years.

Programmes for improvement of the educational infrastructure and their effectiveness

Indicators for tracking quality are also needed to assess the effect of the many trainings that are conducted under various programmes of the Ministry of Education and Science.

Teachers left work in 2019



According to a report issued by the Ministry, in 2022, over 47,000 students and over 8,900 teachers participated in training under such programmes. Only under the National Program “Motivated Teachers and Qualification” in 2022, 1,112 principals of educational institutions were trained, yet there are no concrete data on the quality of the trainings and their effect.

Inclusive education

The Ministry of Education and Science makes systematic efforts to implement its policies to support the process of inclusive education. The persistent political will on the part of the Ministry to support the process of inclusion in the mass educational environment of children and students with **special educational needs** can be seen through a number of projects and national programmes implemented with national and European funding.

Notwithstanding, despite the adopted relevant regulations, **normatively prescribed procedures are followed formally, whilst issues with the schools’ resource organisation and the lack of tracking of the effectiveness of the inclusive education measures remain pending.**

From the data provided by the Ministry of Education and Science, concerning students with special educational needs in professional classes for the academic year 2022/2023, it can be traced that their number is significantly reduced compared to the total number of students with special educational needs educated within the framework of basic education. This trend was also commented on within previous editions of the Report Card, yet in view solely of comparing the total number of students with special educational needs in the stages of primary education and those in the stages of secondary education.

Despite the circumstance that the data are only for the current school year, trends can be extrapolated – there are 2070 students with special educational needs in the 7th grade, 1292 – in the 8th grade, 1152 – in the 10th grade (791 of whom are studying in professional classes), and merely 775 in the 12th grade (414 of whom are studying in professional classes).

These figures will be monitored in the coming years with the aim of extrapolating trends, yet even at this stage it can be argued that there are **no real practical mechanisms to ensure the right of pupils with special educational needs to quality vocational training.** This greatly

In 2022, the exchange of school innovations under the National Program “Innovations in Action” continues, with mobilities between 300 innovative and 300 non-innovative schools, 7 regional forums organized by the Regional Department of Education reaching 1200 participants – teachers and students, and 1 National Forum uniting over 500 participants (information rendered by the Ministry of Education and Science, 2023). At the same time, there is no information concerning the results of these activities. There is a lack of visibility of the extent to which innovative schools succeed in inspiring their colleagues to adapt and multiply the former’s good practices.

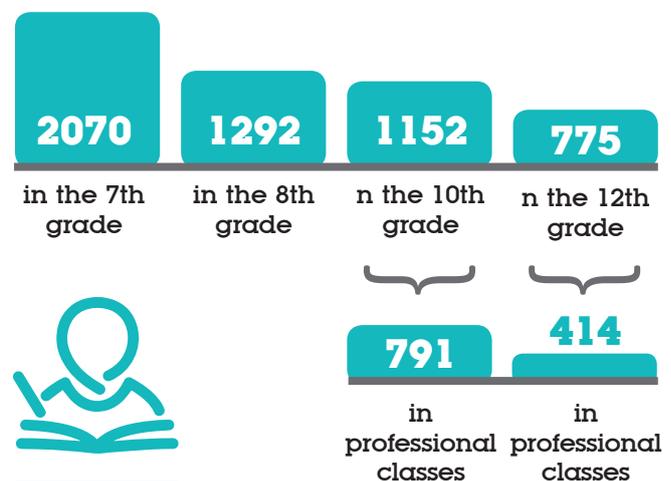
Updating the curricula

In 2022, a curriculum modernisation process was launched, yet not all stakeholders were involved. For instance, experts from civil society organizations were completely excluded from this discourse. Further, after a preliminary analysis and survey amongst teachers and students, no further steps were taken and the curricula remained unaltered.

reduces their chances for realization on the labor market and for exercising their right to work as a condition for an independent life as senior citizens.

There is also no data in the educational system on how the professional guidance of students with **special educational needs** is carried out by the existing career guidance and counseling centers, which have the status of personal development support centers under the Preschool and School Education Act.

Students with special educational needs in professional classes for the academic year 2022/2023 (according to data provided by the Ministry of Education and Science)



It is very important that schools offer recreational spaces for relaxation and conversations with friends

Author: Laura Ivanova, Megaphone Youth Network

With the young people from the Megaphone Youth Network we explored one of the most important topics to us – namely, education. 6 young people aged 14-16 took part in the focus group that we conducted.

We asked our peers what they wanted their school to look like. The most common association was that the school ought to be „beautiful, with big windows, to be colorful“. Most participants shared that dark colors depress them and that they prefer to study in a school where light shades prevail. According to the interviewed young people, it is necessary to **have recreational spaces in schools** where children can talk about topics they find important with their classmates during breaks and after classes. Larger rooms are preferred by the survey participants, since they allow for better comfort and more air.

Another very important element they pay attention to is the teachers' **innovative teaching approach**. Although some of the young people say that their teachers try to diversify the teaching and include more audio-visual content, young people believe there is a need for support from the management in the search for innovative teaching solutions. Young people support approaches to teaching in non-formal education (for instance, lessons taking place in nature). They share their regret that, from their experience, **the school management does not support the teachers in their ideas to make the learning process more pleasant and intriguing for their students**.

Regarding the extent to which young people want to be able to be more actively involved in decision-making related to school life, participants were united by their desire to interact actively with teachers and school management. **„Everyone can contribute to decision-making, since only in this way can the learning process be useful to all participants in it.“**

Digital and media literacy in education

At the beginning of 2022, on the basis of a specially prepared methodology, the first national survey of the digital media skills of high school students was conducted, the results of which do not surprise anyone



Students in the 10th grade encounter serious difficulties in extracting and interpreting information from written text, including media texts, and these difficulties are particularly visible when assessing students' competences and cognitive skills through open-ended questions and especially in tasks that require them to articulate individual reasoning.

The conclusions correspond with the low levels of reading literacy of Bulgarian students already measured by PISA. Additionally, the results show that despite the fact that students use digital devices and the Internet widely and

autonomously, full use of the opportunities provided by the Internet does not occur in practice.

According to the experts who worked on the research, **a key to developing students' critical thinking, as well as their metacognitive skills and attitudes, is the integration of media texts and the work with various digital information sources and tools in the educational process**. Unlocking the full potential of these tools can happen solely with the help of the school. It is utterly necessary to rethink the tasks for teachers, the learning content and the learning process as a whole.

Experts from the Media Literacy Coalition have produced a methodology for teaching media literacy throughout the educational process (i.e. through every subject taught). To date, more than 200 teachers have been trained to use this methodology, which will contribute to a complete change in the way of teaching and increase important skills of students from grades 8th to 12th. These skills and attitudes are critically needed by modern citizens for their professional and personal fulfillment, and for their responsible participation in the public sphere and democratic processes.

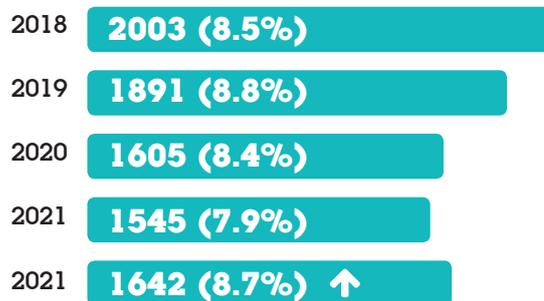
Health and sexual education

Systemic health and sexual education is a curriculum-based process of teaching and learning about the cognitive, emotional, physical, and social aspects of health and sexuality. In the current year, the trend towards a decrease in the frequency of abortions in the age group of 15-19 years is interrupted, after in 2018 it was 2,003 or 8.5% of the total number of abortions, in 2019 – 1,891, or 8.8% of the total number,

and in 2020 – 1,605, which is 8.4 of the total number of abortions, and for 2021, it is 1,545, or 7.9% of the total number of abortions, and in 2022, according to operational data of the National Center for Health Information, the number of abortions at this age increased to 1642, along with their relative share, which rose to 8.7%. In the age group under 15, the number of abortions in 2022 remains the same as

in 2021 – 100 or 0.5% of the total number of abortions in the country. There is some decrease in numbers compared to 2020 in this regard, as well, yet no steady downward trend after 2015 is visible. Despite the circumstance that the average age of mothers at first birth in our country has grown significantly in recent years, it is still the lowest in the EU4 region. The number of live births to mothers under the age of 20 for 2021 was 5,861, or 9.99% of all live births, showing a minimal decrease compared to 2020 when the number was 5,970, or 10.10% of all live births. **Practically every tenth child in the country is born to a mother in her teenage years, which raises the question of the need for systematic health education services for young people and the distribution of free or reduced-price contraceptives.** In Bulgaria, there is still no adopted national program on sexual and reproductive health (SRH) and the activities aimed at SRH are included in several of the current strategic and programme documents that the Ministry of Health implements, namely the National Health Strategy (2030), the National Programme for the Improvement of Maternal Health and Children's Health (2021-2030), the National Programme for the Prevention and Control of HIV and Sexually Transmitted Infections (2021-2025), etc.

Abortions among girls aged 15-19



Abortions among girls under 15 years of age



RECOMMENDATIONS

- Adopt an Action Plan to the Strategic Framework for the Development of Education, Training and Learning in the Republic of Bulgaria (2021 – 2030) and to the Road Map for the Development and Reform of the Policy for the Workforce in the Teaching Profession, with quality and impact assessment indicators included, as well as a clear and transparent system for monitoring and evaluating performance;
- Adopt a national quality framework that defines the desired results at each stage of education, the quality indicators, the ways of measuring them and actions in case of implementation or non-implementation of predefined results;
- Establish cooperation and sustainable interaction mechanisms between the Ministry of Education and Science, the Regional Directorate of Education and the National Inspectorate of Education for monitoring the activity of school principals, based on the National Quality Framework;
- Devise a plan to support the principals of schools with low quality of education and, in the event of failure to implement the plan, apply the measure of dismissal as a last resort;
- Implement a mechanism for external evaluation and internal self-evaluation of educational institutions in relation to the National Quality Framework;
- Introduce a competence model in the selection, training and certification of principals and teachers;
- Integrate this competence model within the curricula

and in the formats for national assessment (National external assessment, State matriculation exams) of students' knowledge and skills;

- Emphasis should be placed on activities and projects that demonstrate an increase in the quality and effectiveness of school education, incl. in the conduct of training, mentoring and additional qualification;
- Provide shared spaces in schools for working on projects, and maintain libraries with access to the Internet and to resources with up-to-date educational content;
- Set indicators for quality and impact assessment in the planning and implementation of European and national programs, as well as for ensuring more transparency, publicity and expediency in the spending of funds on the latter's implementation.
- Build a mechanism for coordinating the actions of relevant authorities and institutions, and tracking the quality of the profiled and professional training of students with special educational needs – from schools to realization on the labor market;
- Take steps to establish new and effectively use existing methodologies for vocational training of children and youth with special educational needs, as well as for training business mentors who can create special jobs for young people with special needs;
- Clarify the relationship between academic training (which remains leading) and the acquisition of professional skills and skills for independent living;

→ Create a system for tracking the ratio between the number of children and students with special needs and the number and type of specialists (incl. resource personnel) who meet the requirements for additional support. Regardless of the general increase in resource specialists, there are still enormous difficulties in providing teams of specialists that can sufficiently meet the needs of students who require long-term and systematic additional support, especially at the high school stage and within the framework of professional training;

→ Synchronise the procedures for collecting data on the number of children with special educational needs in the various stages and levels of education. Particular attention ought to be paid to guaranteeing access to adequate professional training to the various groups of students with special educational needs;

→ Training and mentoring of children and young people with special educational needs should be carried out in accordance with the individual needs and wishes of the students, and not according to the limitations of the city or district in providing vocational training in the existing vocational high schools or secondary schools with vocational classes;

→ In the centers for professional guidance and counseling, a model of cooperation with the regional centers to support the process of inclusive education should be built to ensure quality diagnosis and referral to specialized professional training for children and youth with special educational needs, as well as to validate skills acquired outside of formal education and training;

→ Vocational education and training for children and youth with special educational needs should be conceptualised more as a system of special educational practices and support measures that promote learning, social inclusion and good quality of life of young people. This should be achieved through the provision of individualised support and the establishment of specialised and accessible learning environment for vocational training.



8.

SPORTS, RECREATION AND LEISURE

SPORTS, RECREATION AND LEISURE

AVERAGE 3.42

- lack of comprehensive policies concerning the use of culture and art as tools for achieving educational goals;
- lack of comprehensive policies for developing and promoting child sports from an early age and for establishing children's sports clubs;
- lack of national and municipal policies for an accessible, safe and shared urban environment for all ages and especially for children and families.



"I want every school to have sports and interest clubs, even if they are paid. You cannot go to an acting class at the other side of Sofia, it should be available in every school."

Child Survey, 2023



"Sports are expensive, extra lessons are expensive, children do not have the opportunity at school to engage and develop in their personal interests and in what they have the potential to attain a higher level of performance. There are no state-funded extracurricular activities available to children in middle – to low-income families."



"There are no adequate free (outdoor or indoor) play and leisure spaces for children over 6 years of age."

Survey, Report Card 2023

Access to sports and physical activity

The main access of children in Bulgaria to sports and sports activities is directly related to the socio-economic capabilities of their parents, the town where they live and, to a rather limited extent, to the school they attend. The Ministry of Youth and Sports funds sports activities for school-aged children, including the „Sports for Children in Leisure Time“ programme, the „Learn to Swim“ programme, the „Children and the Sports Club“ programme, along with several other programmes aimed at individual sports and/or aimed at financing competitions of children's sports clubs. Notwithstanding, the scope of these programmes is still utterly limited in relation to the total number of school-age children, does not cover children at an early age where sports activities in kindergarten (if any) are in most cases paid for by parents, and possesses a negligible impact on sports for children with disabilities.

It is noteworthy that there are few places in the country where activities financed by the Ministry of Youth and Sports are held, probably since the sports base is too limited, amortized, difficult to maintain or completely

absent. The „Learn to Swim“ programme for 2022 was implemented in solely 3 settlements (in 6 pools). Infrastructure such as school pools could accommodate many active children practising sports at once, yet it requires serious investment on behalf of the municipalities and the state.

Mass sports for children in Bulgaria is chronically underfunded and left to the family's financial choices, thereby limiting both the free choice of children and the development of their talents due to lack of access to the desired sport.

This further hinders the opportunity to discover and motivate sports talents.

■ „Sports for Children in Leisure Time“ Programme – 98 projects for 28 types of sports in 46 settlements with a total number of over 3,600 participants, with a budget of 573,500 BGN;

■ „Learn to Swim“ Programme – 10 projects in 3 settlements with 6 swimming pools, with a total number of over 624 participants, with a budget of BGN 115,200;

■ **„Children and the Sports Club“** Programme — 33 projects in 18 types of sports in 14 settlements with a total number of over 7,196 participants, with a budget of 195,600 BGN;

■ **„Tennis – a Sport for All“ Project** – The total number of children is over 863 from 34 sports clubs, with a budget of 157,000 BGN.

„Sports for Children in Leisure Time“



98
projects

28
types of sports

46
settlements

> **3 600** children

„Children and the Sports Club“



33
projects

18
types of sports

14
settlements

> **7 196** children

„Learn to Swim“



10
projects

3
settlements

> **624** children

„Tennis – a Sport for All“



34
sports clubs

> **863** children

The Ministry of Youth and Sports reports that due to restrictions related to the pandemic, within the first 6 months of 2022, some of the activities under the programmes cited above have not been fully implemented, and some of the planned activities have been altered. Therefore, there is a decrease in the reach of children, which the institution intends to compensate for in 2023. At the same time, however, other reasons for the low reach pertain to low quality of the projects submitted, lack of capacity in many of the sports clubs, lack or poor condition of the sports base and

equipment, lack of interest from the target groups, inflation, etc. These issues ought to be addressed not merely through an increase in targeted funding, but also with investments in the training of personnel for the development of children’s sports in schools and kindergartens, through improving the material base, communication campaigns among children and parents – all of which carried out in close partnership with the local government and the civil sector.

Sports as a source of self-confidence

Author: Denis Yordanov, Megaphone Youth Network

With the young people from the Megaphone Youth Network, we explored one of the topics of interest to us – namely, the opportunities for young people to play sports. 11 young people aged 14-16 took part in the focus group we conducted.

We asked young people if they think sports activities are accessible to anyone who wishes to exercise. Most responded that they were accessible, commenting that there were designated spaces that students took advantage of. Some shared that they would like to increase physical education classes at school – from one to two times a week. During the discussion, some young people emphasized that sports are not equally accessible to all groups of society – for instance, to children and young people with different mobility difficulties. Another common comment was that playing most sports requires financial resources, which not all families possess. Young people believe that the state should allocate more funds in this direction.

We asked the focus group participants why it is important for young people to have the opportunity to play sports. The most common association of the respondents was related to maintaining a good physical and mental condition. „Training in sports leads to greater self-confidence, better discipline, better mental health, which ultimately affects a person’s physical condition.“ The interviewed young people further commented on the issue of overweight and the possibility for sports to have a positive influence in this direction.

We discussed the preferred sports of young people with the participants in the focus group. The most common choices that were shared included fitness, swimming and jogging. Volleyball and dancing are also preferred. Young people say that they exercise regularly – 3-4 times a week.

Access to cultural and artistic events and activities

Children who show aptitude and interest in a certain type of art from an early age are educated in specialized schools with a professional focus, which are under the auspices of the Ministry of Culture.

The Ministry of Education and Science implements the National Programme „Ensuring a Modern, Safe and Accessible Educational Environment“, which contains the module „Cultural Institutions as an Educational Environment“. This module enables visualization, interactivity, project activities and teamwork on the part of teachers and representatives of cultural institutions and is directly related to the formation of key relevant competences of adolescents.

There is a strong interest in the activities and expansion of the school partners under this module. In the academic year of 2018-2019, the module had a budget of BGN 100,000 and 56 school projects were approved for funding, whilst in the academic year of 2022-2023, the budget of the module was BGN 550,000, and 263 school projects were approved for funding. These include conducting mandatory, elective and optional lessons in museums and galleries for the classes of the primary and junior high school stages of education, and the first high school stage of secondary education; conducting virtual tours and video lessons; visits to theater plays and concerts related to specific educational content; meetings with actors and musicians, etc.

The National Programme „Together in the Arts and in Sports“, which is implemented during the academic year of 2022-2023, renders the opportunity to create and support interest groups in the school, depending on the wishes and interests of the students. Such activities are the way to discover, stimulate and develop children’s individual talents and preferences, which is utterly important for the overall personal development of each child.

Budget of the module „Cultural Institutions as an Educational Environment“



BGN 100 000
in the academic
year of 2018-2019 } **56**
school projects

BGN 550 000
in the academic
year of 2022-2023 } **263**
school projects

As can be seen, the joint efforts of the Ministry of Education and Science and the Ministry of Culture expand the range of opportunities for access and participation of students in arts and culture. Notwithstanding, current results of these programmes’ implementation are still rather unsatisfactory, considering that in Bulgaria there are 1817 kindergartens and 2769 schools with over 923 543 students (according to NSI data).

The Ministry of Culture has not yet taken enough comprehensive measures to stimulate the interest of the young generation in art, for which there is a plethora of good practices in many EU countries. The Ministry of Education and Science, on the other hand, has not yet discovered and utilized the possibilities of art as a method of teaching the educational material.

The urban environment for children – a (non)dangerous game of priorities

In 2022, among the other challenges the country faced, road safety and the generally safe environment around schools, kindergartens, playgrounds and parks stood out with particular sharpness. The most obvious occasions were traffic accidents involving students in school districts, as well as citizen reports, which gained prominence through the media, of an inaccessible or unsafe environment in terms of traffic and infrastructure.

Commitments are made, results are lacking

Despite the priority stated by institutions such as the Ministry of Education and Science and the Ministry of Youth and Sports for the improvement of schoolyards – in the part of sports activities – there are still no realized projects to cite, nor any relevant data. The Ministry of Education and Science rendered official data, according to which during the year it financed the construction of 72 new sports grounds with specialized sports flooring, and engaged in the basic repair of sports grounds in another 60 schools,

utilizing a budget of BGN 15 million under the Programme for the Construction of New and Repair of Existing Sports Grounds and Playgrounds in State and Municipal Schools. Notwithstanding, there are no correct examples of these activities presented on the website of the Ministry of Education and Science, which is considered a negative communication practice.

Regarding the work of the municipalities, examples of proactive actions can be given (especially with view to the circumstance that 2022 is a year preceding local elections) – i.e. larger budgets allocated for school yards and repairs, new playgrounds, etc. The Municipality of Sofia reports that in 2022 it carried out 154 inspections of schoolyards in 41 schools; 11 major repairs of schoolyard spaces in 9 educational institutions; along with 50 current, emergency, urgent and unforeseen repairs for sports facilities in 33 schools. Facilities in 8 schools have been fully renovated. Naturally, the question arises of whether teachers, parents, students, and the local community participated as stakeholders in these

activities, on what principle these schools were selected, what the assessed quality of the activities was, etc.

In the capital and throughout the country, the number of schools with 24/7 free access to the yard spaces is growing – 127 schools in Sofia, of which 109 schools have access to the schoolyard for children with disabilities.

The Ministry of Regional Development and Public Works has no time for playgrounds

Last but not least, during last year, the Ministry of Regional Development and Public Works (MRDPW), within period of frequent ministerial changes, failed to adopt another update of Ordinance No. 1 of 2009 on the Terms and Conditions for the Safety of Playgrounds. In March 2022, then-minister Grozdan Karadzhev promised that control would be strengthened, and explained that in 2021 a review was carried out on the implementation of the requirements of the Ordinance. Nearly one year later, the Ordinance has not been updated and cannot be applied to new play and sports facilities in schoolyards, for which it was not intended. The Ministry of Regional Development and Public Works itself shows negligible interest in this matter.

Road (non-) safety in real conditions

Road safety around schools and training on the latter is a commitment of the State Road Safety Agency, the Ministry of Education and Science, and the municipalities. In 2022, many training sites for students and younger children were built in educational institutions, and active online and live trainings were held in a secure environment. According to data from the Ministry of Education and Science, under the National Programme „Ensuring a Modern Educational Environment“, Module 5 „Road Traffic Safety

Training Sites“, funds amounting to BGN 799,903 have been provided to 135 kindergartens and 248 schools. The document states: „In its essence, road safety education and training is active. It is aimed at forming and building practical skills. An opportunity to acquire them in real conditions is assured through the use of the indoor and outdoor playgrounds.“

Regrettably, positive initiatives, such as the pilot Project „School Buses on the Territory of the Sofia Municipality“, a continuation of the „Green Sofia“ Project of the Association for the Development of Sofia, will be realized solely for one school year. This Project addresses the issue that more than 52% of parents take their children to school by car, and highlight that traffic is their main concern for children’s safety. 2 schools in Sofia have received school buses through project funding, and interest in the initiative grew stronger.



More than 52%
of parents take their children
to school by car

RECOMMENDATIONS

- Place the concept of adapting the urban environment to the needs of children and families in the centre of the public discourse and turn it into a national priority;
- Include teachers, students, and the local community in all activities for the establishment and maintenance of the urban environment, through communication and advisory methods;
- The opening of the schoolyards during non-working hours should become a shared goal of society and institutions;
- Make road safety a mandatory part of the educational policy, by changing the institutional approach to a more practical one;
- National institutions and municipalities should work sustainably, not campaign-wise, on the above-described challenges;
- Expand the number and scope of programmes for

familiarisation with the achievements of culture and art in kindergartens and schools;

- Develop programmes at the municipal level between schools themselves, as well as through external forms of education outside of classrooms, related to art and culture, under the curriculum and beyond the latter;
- Allocate far larger resources for the development of mass sports in schools, in sports clubs and in centers for personal development;
- Engage more children in sports from an early age;
- Modernise sports infrastructure and envisage the construction of new, smaller sports halls and facilities with more basic conditions, with the aim of covering more children;
- The state ought to develop more effective personnel policies – attracting coaches and piloting programmes for the support of specialists in various sports.

LIST OF ABBREVIATIONS

| | |
|-----------------------|---|
| AAPI | Application for access to public information |
| ADR | Alternative dispute resolution |
| ASA | Agency for Social Assistance |
| ASPEN | American Society for Parental and Enteral Nutrition |
| BASPPA Bill | Amending and Supplementing the Penal Procedure Code |
| BHC | Bulgarian Helsinki Committee |
| BIS | Births Information System |
| CAB | Chamber of Architects in Bulgaria |
| CABMA | Combating the Antisocial Behaviour of Minors Act |
| CC | Children's Council (with the SACP) |
| CC | Criminal Code |
| CEID | Chamber of Engineers in the Investment Design |
| CIPE | Centre for Information Provision of Education |
| COCA | Company under the Obligations and Contracts Act |
| CoM | Council of Ministers |
| COVID-19 | Coronavirus Disease 2019 |
| CPA | Child Protection Act |
| CPC | Criminal Procedure Code |
| CSC | Community Support Centre |
| CSRI | Centre for Social Rehabilitation and Integration |
| CVAFCA | Crime Victim Assistance and Financial Compensation Act |
| DML | Digital media literacy |
| DSA | Directorate for Social Assistance |
| EAMS | Executive Agency "Medical supervision" |
| ECEC | Early Childhood Education and Care |
| ECI | Early childhood intervention |
| EFA | European Federation of Allergy and Airways Diseases |
| EP | European Parliament |
| ESPAD | European School Survey Project on Alcohol and Other Drugs |
| EU | European Union |
| FC | Family Code |
| FIERST | From Inclusive Education to Real Scale Transfer |
| FTCC | "Fund for Treatment of Children Centre" Centre |
| FTPC | Family-Type Placement Centre |
| FTPCCYPD – CMC | Family-Type Placement Centre for children and young people with disabilities in need of constant medical care |
| FTPCCYPD | Family-Type Placement Centre for children and young people with disabilities |
| GBV | Gender-based violence |
| GDCCR | General Directorate for Control of Children's Rights |
| GDCOC | General Directorate "Combating Organised Crime" |
| GDNP | General Directorate "National Police" |
| GDP | Gross Domestic Product |
| HBSC | Health Behaviour in School-aged Children |
| HCC | Health Counselling Centres |
| HCDPC | Home for Children Deprived of Parental Care |
| HIV | Human Immunodeficiency Viruses |
| HMSCC | Home for Medical and Social Care for Children |
| HPV | Human Papillomavirus |
| HRD OP | Human Resources Development Operational Programme |

| | |
|---------------------|--|
| ICF | International Coach Federation |
| IE | Inclusive education |
| IJDU | Inspectors from Juvenile Delinquency Unit |
| IOM | International Organisation for Migration |
| ISCED | International Standard Classification of Education |
| PENSA | Parental and Enteral Nutrition Society of Asia |
| PISA | Programme for International Student Assessment |
| SIC | Safer Internet Centre |
| STEM Science | Technology – Engineering – Mathematics |
| UNESCO | United Nations Educational, Scientific and Cultural Organization |
| UNICEF | United Nations Children’s Fund |
| UNFRA | United Nations Population Fund |

NNC MEMBERS IN 2022

Burgas Region

The Faithful Steward' Association
'Demetra' Association
'Regional Roma Alliance' Association
'Smile' Association
"Together for a Better Future"
Association (Sredetz)

Varna Region

'Gavroche' Association
'Karin Dom' Foundation
'Vassilitsa' Association
Varna Agency for Social Development
'Vision'
'Joy for Our Children' Foundation
Social Association 'St. Andrei'
Family Centre Maria – Spina Bifida and
Hydrocephalus Association
'Sauchastie' Association
Life with Down Syndrome Foundation
Nyama Nevazmozni Neshta Association
Family Zone Foundation
'IDEA' Association

Veliko Tarnovo Region

'International Social Service' Foundation

Vratsa Region

'First of June' Association (Byala Slatina)
'Science and Technology Centre'
Association
'New Way' Association (Hayredin)
School Board of Trustees of 'Hristo Botev'
School (Tarnava)
Good Samaritan Association (Kravoder
Village)

Gabrovo Region

CYMCA Gabrovo Association
'Social Dialogue 2001' Association

Dobrich Region

Helping Hand Foundation

Kardjali Region

Association 'Initiative for Development
Kardzhali Decides'

Kyustendil Region

Association Largo

Lovech Region

'Knowledge' Association

Pazardjik Region

'Future' Foundation (Rakitovo)
'Juleviya Dom'
KUZMANOV Foundation
Zvanitchevo Crime Prevention Fund IGA
'Social Practices in the Community'
Foundation

Pernik Region

'PULSE' Foundation

Plovdiv Region

Foundation YES
One Heart Foundation

Razgrad Region

Association Janeta
Association Phoenix

Сдружение „Феникс“ – Разград

Ruse Region

Open Society Club – 'Equilibrium'
Association – Association Centre
Dynamica

Silistra Region

'Ekaterina Karavelova' Women's
Association

Smolyan Region

'Future Now 2006' Community Cultural
Centre (Chitalishte)

Sliven Region

The Health of Roma People Foundation
Association "Médecins du monde" –
Bulgaria

Sofia City Region

'Parents' Association
Bulgarian Association of Adopted
Children and Adoptive Parents
Bulgarian Family Planning and Sexual
Health Association
Bulgarian Training Centre
'Child and Space' Association
'For our Children' Foundation
Health and Social Development
Foundation
Social Activities and Practices Institute
Foundation 'Hope for the Little Ones'
'Partners
Bulgaria' Foundation
'Friends 2006' Foundation
'Human Rights' Project
'Applied Research and Communications'
Foundation 'Cedar'
Foundation SOS Children's Villages
Bulgaria
Social Theatre Formation 'Tsvete'
Association for Pedagogical and Social
Help for Children FICE Bulgaria
Worldwide Orphans Foundation Bulgaria
'Centre Nadya' Foundation
ELA Association
Centre for Psychosocial Support Habitat
for Humanity Bulgaria
'Evrika' Foundation
'Agapedia Bulgaria'
Foundation 'Teach for Bulgaria'
Foundation National Association of
Resource Teachers
ECIP Foundation

Association for Progressive and Open
Communication
Bulgarian Helsinki Committee
Bulgarian Paediatric Association
National Network of Health Mediators
Alliance of Bulgarian Midwives
'Concordia Bulgaria' Foundation
'Tsvetan Tsanov' Foundation
'The Duke of Edinburgh's International
Award Bulgaria'
Foundation Association for Bulgarian
Family Values, Traditions and Culture
'Bulgarche'
'Children's Books'
Association National Centre for Social
and Emotional Development
M&M Physio Foundation
'Re-Act' Association
'Bulgarian Psychoanalytic Space'
Institute for Progressive Education
'Single Step' Foundation
Law and Internet Foundation
The Change Foundation
'Dechitsa' Foundation
Our Premature Children Foundation
'Listen Up' Foundation
National Foster Care Association
'Mam and Dad's Diary' Foundation
Association 'Institute for Mediation and
Conflict Management (IMCM)
Foundation III "Three"
Foundation Association of Parents of
Children with Kidney Problems
National Scouts Organisation of Bulgaria
Hestia Foundation
'Center for Experiential Learning'
Association
Council of Refugee Women in Bulgaria
"Private Primary School Milea"
Association Safe Playgrounds
"I Want a Baby" Foundation

Stara Zagora Region

'Future for Children' Association
(Kazanlak)
'Samaritans' Association
'World without Boundaries' Association
Foundation Mission Wings

Targovishte Region

'Academica 245' Association
Antonovo 'Naya' Association
Targovishte Club of NGOs

Shumen Region

Association of Roma Women 'Hayatchi'
(Novi Pazar)
Roma Spark Foundation

Yambol Region

Municipal School Board of Trustees
(Boliarovo)
Chitalishte 'Umenie 2003'

Iceland 
Liechtenstein
Norway **Active
citizens fund**

This document was created under the project „Children in the Heart of the Bulgarian Democracy“, which is implemented by the National Network for Children with the financial support of the Active Citizens Fund of Bulgaria under the Financial Mechanism of the European Economic Area. The main goal of the Project is to improve democratic culture and civic awareness. The entire responsibility for the content of the document lies with the National Network for Children and under no circumstances can it be assumed that it reflects the official opinion of the EEA Financial Mechanism and the Operator of the Active Citizens Fund Bulgaria.
www.activecitizensfund.bg



NATIONAL NETWORK FOR CHILDREN

www.nmd.bg / facebook.com/nmdbg
