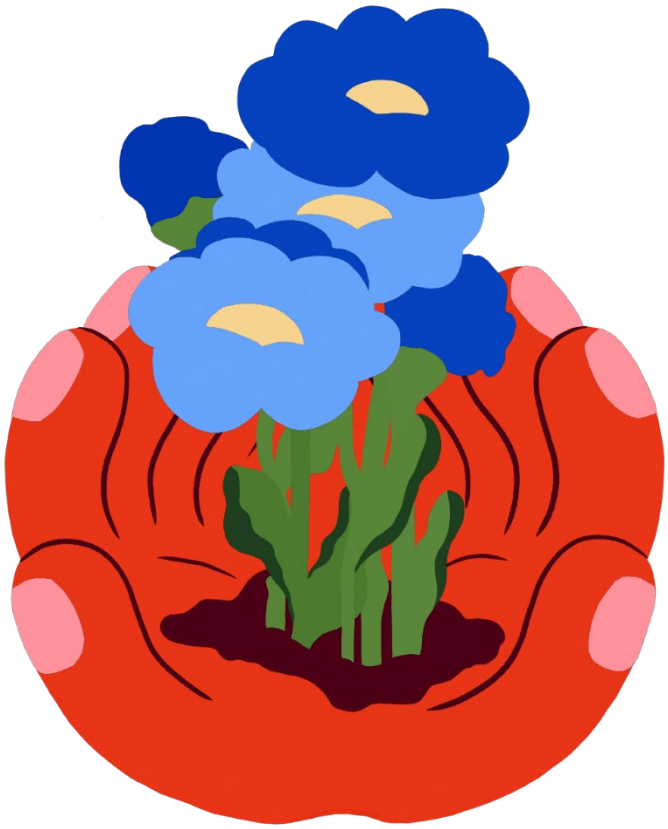
Closing the Gap: Making the European Child Guarantee Work for Every Child in Bulgaria



Joint Position Paper on Bulgaria's Second Biennial Progress Report

CHANGE for Children in Bulgaria

Joint Position Paper on Bulgaria's Second Biennial Progress Report (October 2026)

A joint contribution by the National Network for Children (NNC), the Know-how Centre for Alternative Care for Children (KHC) at the New Bulgarian University (member of the Childhood 2025 Coalition), and the Trust for Social Achievement (TSA)

1. Introduction

This joint paper brings together the assessments of Bulgarian civil society actors engaged in monitoring and supporting the implementation of the European Child Guarantee (the Child Guarantee) in Bulgaria:

- The **National Network for Children (NNC)** is an alliance of more than 130 civil society organisations working to support children and families with the mission to strengthen and facilitate cooperation between non-governmental organisations and all relevant stakeholders in order to ensure the rights and well-being of children. NNC is a member of the Permanent Expert Working Group (PEWG) set up to support the monitoring and coordination of the Child Guarantee implementation process.
- The **Know-how Centre for Alternative Care for Children (KHC)** at the New Bulgarian University, is a research centre working to integrate academia, policy and practice in support of children and families in vulnerable situations, and also a member of the Childhood 2025 Coalition, an alliance of civil society organisations and individual experts working on child welfare policy.
- The **Trust for Social Achievement (TSA)**, is a grant-making organisation working to reduce poverty and expand opportunities for disadvantaged children and families, with a particular focus on Roma communities. Drawing on 14 years of field-based work, it pursues this through evidence-based programmes, policy, advocacy, and partnerships with public institutions and civil society.

The paper has also been co-developed with **Eurochild** which, through the *Change for Children in Bulgaria* project - funded by Tanya's Dream Fund - has collaborated with Bulgarian civil society organisations, amplified the expertise of its members and supported further capacity development.

This position paper provides feedback on Bulgaria's second biennial progress report on the implementation of the European Child Guarantee for the period March 2024 to February 2026 (the biennial progress report) and proposes recommendations for future action.

We welcome the steps that Bulgaria has taken, including the removal of nursery and kindergarten fees, the extension of compulsory pre-school education, and new investment and classifications in social services.[1] However, these measures pre-date the March 2024 to February 2026 reporting period.[2] **The question for this reporting cycle is therefore whether these established reforms,**

[1] The Ordinance on the Quality of Social Services Bulgaria, in force since 2022.
[2] Fees for nurseries and kindergartens were removed on 1 April 2022, as the biennial progress report confirms. Compulsory pre-school from age four was adopted in 2020 (State Gazette No. 82 of 18 September 2020) and took effect in 2021, with municipalities phasing it in and national roll-out due by the 2023/2024 school year.

together with more recent investment in social services, have improved effective access and measurable outcomes for children in need. There continues to be a significant gap between formal entitlement and effective access to early childhood education and care, education, healthy nutrition, healthcare and adequate housing. National monitoring and reporting systems do not yet allow this gap to be adequately measured or addressed.

2. General context

Bulgaria records the second-highest share of children at risk of poverty or social exclusion (AROPE) in the European Union (EU): **33.1% in 2025, against an EU average of 24.3%.**[3] The European Child Guarantee, established by Council Recommendation (EU) 2021/1004 (the Council Recommendation)[4], was designed to close the gap between children's formal entitlement to key services and their effective access to such services.

Children made up 17% of Bulgaria's population at the end of 2025, some 1,094,629 children under 18.[5] While this share has grown over the past 15 years, the absolute number of children has fallen by nearly 80,000 since 2011.[6] Child mortality remains high in several regions, with up to fivefold disparities between the highest and lowest rates. Child poverty (before social transfers) and poverty among large families, single-parent households and families with low parental educational attainment has not fallen (and in some respects has increased) since 2012.[7]

Inter-generational transmission of poverty is still prevalent in Bulgaria, which recorded the highest at-risk-of-poverty rate (48.1%) among adults who considered their household's financial situation to have been bad during their childhood, and also the largest difference in the respective risk compared with those from better off households.[8]

These trends have unfolded in the absence of key strategic documents: **Bulgaria has no National Strategy for Children,** and its last National Housing Strategy dates back to 2004 and does not recognise social housing. While a *National Programme for the Prevention of Violence and Abuse against Children (2023–2026)*[9] is currently in force, its scope is limited to a single policy area and is not a substitute for a comprehensive, cross-sector strategy for children. In this absence, the Child Guarantee has, in practice, become the sole overarching instrument for coordinating child-related policy across sectors, a role for which it was not designed and for which it lacks the necessary strategic weight.

3. The biennial progress report: an administrative exercise rather than an instrument of change

In Bulgaria, the Child Guarantee is implemented primarily as an administrative and reporting framework rather than as an instrument for systemic transformation. In the absence of national

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[3] Republic of Bulgaria, *Report on the Implementation of Council Recommendation (EU) 2021/1004 Establishing a European Child Guarantee for the Period March 2024 – February 2026*.
[4] Council Recommendation (EU) 2021/1004 of 14 June 2021 establishing a European Child Guarantee, OJ L 223, 22.6.2021, p. 14.
[5] National Statistical Institute of the Republic of Bulgaria, *Children in Bulgaria 2025*, p. 2, 2026.
[6] National Network for Children (NNC), Belejnik 2026, annual report on child poverty and well-being in Bulgaria, p. 14.
[7] Ibid p. 29.
[8] European Commission, *Staff Working Document reviewing progress made in the implementation of the Council Recommendation (EU) 2021/1004 of 14 June 2021 establishing a European Child Guarantee*, p. 7, 2026.
[9] Council of Ministers of the Republic of Bulgaria.

strategies whose adoption has been postponed for years, the Child Guarantee has at times become the only available instrument of support, but one which lacks a systematic analysis of unmet needs and of the barriers to accessing services. This gap raises important questions about the Child Guarantee's actual impact on its intended beneficiaries, namely children in need.

While the biennial progress report follows the structure of the EU's common monitoring framework and reports genuine efforts to align Bulgarian policy with the Child Guarantee, its analytical value is limited by significant deficiencies. Despite the state's efforts at administrative compliance, **the report does not provide evidence of the impact** of the actions taken during the reporting period, does not reflect what has been achieved in direct response to the specific requirements of the Council Recommendation, and consequently does not provide insight into the effectiveness of the Child Guarantee in Bulgaria. **A retrospective, narrative style prevails over factual reporting of progress within the reporting period itself**. General formulations such as 'in recent years, our country has taken serious and targeted steps'[10] substitute for analysis of what changed from 2024 to 2026, diverting attention from the most recent developments in implementation.

The biennial progress report is largely a technical compilation of current programmes and projects, many of which would probably have been implemented without the Child Guarantee. Even the funding section gives no indication of which measures are qualitatively new and which ones merely sustain earlier activities. Legislative amendments, digital platforms, professional qualification programmes and infrastructure investments are presented within a single overarching context, without distinction. The **prolonged development of a new National Housing Strategy** illustrates the delays in completing much-needed legislative and policy reforms.

Achievements without evidence

The abolition of fees for all state nurseries and kindergartens, since 2022, is repeatedly cited as a key achievement but without any analysis of whether it increased participation specifically among children at risk of poverty, including Roma children. **Available evidence suggests the opposite may in fact be true: participation among children below the age of three at risk of poverty or social exclusion reportedly fell by more than eight percentage points despite this measure,** a contradiction that the biennial progress report does not investigate.[11]

The same approach recurs in other areas of reform, such as **the deinstitutionalisation process.** This is reported on without an assessment of whether it has reduced the number of children entering the child protection system and alternative care. There is no information about supporting care leavers in their sustainable transition to independent living. The report does not provide data on the quality of alternative care across regions (at the end of 2025 the last two Homes for Medical and Social Care for Children remained operational, in Varna and Pleven). Since 2024, the Council for Supporting the Process of Moving Children Out of Residential Care has not supported the relocation of children placed in the remaining Homes for Medical and Social Care for Children.

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[10] Republic of Bulgaria, *Report on the Implementation of Council Recommendation (EU) 2021/1004 Establishing a European Child Guarantee for the Period March 2024 – February 2026*, p. 3.
[11] European Commission, *Staff Working Document reviewing progress made in the implementation of the Council Recommendation (EU) 2021/1004 of 14 June 2021 establishing a European Child Guarantee,* p. 34, 2026.

Educational programmes such as *Strong Start*, *Success for You* and *Access to Education for Every Child* are likewise described mainly in terms of activities and administrative coverage, with no analysis of whether they have actually improved access, educational outcomes or social inclusion.

This same deficit is visible in the section on healthy nutrition. Although the report lists measures such as the *Children's Kitchen* and the *Support for the Little Ones* project, it does not state what share of children in need have guaranteed access to at least one free healthy meal every day. Reporting stops at the number of meals distributed, without assessing whether the strategic goal of eliminating food insecurity among the most vulnerable groups has been met.

Data gaps

Data is not disaggregated to show the effect of measures on AROPE children specifically, as distinct from the general child population or from Bulgaria's own national target groups. Results from the Programme for International Student Assessment (PISA), for example, are reported only in aggregate, without reference to the quality of the educational environment or access to digital learning materials for children in need. There is also a critical lack of information on the impact of any measure on inter-generational poverty, which is the basis of the Child Guarantee's long-term goals and is itself named as a key challenge in the biennial progress report.

There is also no comparison between the number of children who need a particular form of support and the system's actual capacity to reach them, so it is not possible to say whether increased funding has translated into improved access or quality. This gap includes frontline workforce planning and individual support services - the report notes an increase in educational professionals, teaching assistants, mediators and resource teachers but does not assess whether that capacity is sufficient to meet identified needs. For measures such as Bulgarian language training or support for young people leaving care, it confirms only that activities are being implemented, **without stating what proportion of children who need such support remain without it.**

More broadly, the report accounts for outputs - such as packages distributed, excursions organised, professionals trained and budgets allocated - rather than outcomes for children. It does not show whether interventions have improved children's health, education or well-being, or make an assessment of those for whom the cycle of poverty has actually been broken. It also lacks independent evaluations or data on the levels of satisfaction with the support and services available for children and families.

We welcome the report's own acknowledgement that 'further improvement of the data collection and integration system is needed, including better coordination between institutions and a more detailed territorial distribution of information, in order to more accurately identify children in need and increase the effectiveness of policies and interventions'[12], and its stated intention to address this, including through the planned mapping of children in extreme poverty. We call on the state to follow through on this commitment.

Future reporting, in Bulgaria and across the EU, should be tested against whether unmet need is known, whether eligible children can actually reach and regularly use good quality services, what changed for whom, how public money was spent, and what decisions followed each pilot project or policy reform.

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[12] Republic of Bulgaria, *Report on the Implementation of Council Recommendation (EU) 2021/1004 Establishing a European Child Guarantee for the Period March 2024 – February 2026*, p. 9.

Funding

Measures to address child poverty in Bulgaria are financed through a combination of national resources, the European Social Fund Plus (ESF+) and other EU programmes, with national budgets remaining the primary source of funding.

In 2025, around €327 million was allocated to family benefits, while over €136 million supported children and families through education and human resources programmes.[13] Bulgaria is one of the 11 EU Member States required to allocate at least 5% of their ESF+ resources under shared management to targeted actions and structural reforms aimed at tackling child poverty. Bulgaria has allocated 5.28% of its ESF+ resources for this purpose. The amount of **€165.1 million** shown under **ESF+ Secondary Theme 06** is an indicative programmed amount combining EU and national contributions, not evidence of actual expenditure or of the recurrent domestic budget that will sustain services once EU co-financing ends.[14]

This concern extends beyond the transparency of the amounts reported: increased funding is highlighted without any assessment of its actual impact, leaving it unclear whether the additional resources improved quality and access, matched children's actual needs, or affected social inclusion and quality of life. Increased investment is a necessary but insufficient condition for closing the gap between entitlement and effective access to services. Without complementary measures to remove the specific barriers facing children and families in need, higher spending does not (on its own) guarantee expanded access or better quality services.

4. Priority areas for substantive implementation

Several measures that are still under development or being piloted on a limited scale - such as the mechanism for mapping children in extreme poverty - are presented as evidence of progress, without explanation of delays or accountability for commitments not yet met.

The authors of this paper highlight the key priority areas where formal entitlement to services and support continues to fall short of effective access, particularly for Roma children and children in marginalised communities.

4.1 Housing, legal identity and civil registration

For many families in informal or unregulated settlements, the primary barrier to accessing services under the Child Guarantee is not cost but the disconnect between legal address registration and actual place of residence. At birth, children are normally registered at an address linked to their parents, but families may be unable to register the dwelling in which they actually live because of its legal status or because they cannot show ownership or lawful use. This complicates access to locally administered services, including healthcare, education, social protection and housing support.

Changes to the Civil Registration Act in 2024 included an important reform intended to address this problem, allowing vulnerable families to register at the address where the service is provided.[15] However, its implementation and its effectiveness for families in informal settlements needs to be monitored.

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[13] Republic of Bulgaria, *Report on the Implementation of Council Recommendation (EU) 2021/1004 Establishing a European Child Guarantee for the Period March 2024 – February 2026.*

[14] European Commission, *Staff Working Document reviewing progress made in the implementation of the Council Recommendation (EU) 2021/1004 of 14 June 2021 establishing a European Child Guarantee,* p. 24, 2026.

[15] Act amending and supplementing the Civil Registration Act, State Gazette No 85 of 8 October 2024.

TSA's Home Security programme has supported **nearly 7,000 Roma residents** across municipalities, including Kyustendil, Dupnitsa and Peshtera, through zoning, legalisation and secure housing acquisition[16], and also contributed to the reform of the Civil Registration Act. Housing security and legal identity should be recognised as enabling conditions across all dimensions of the Child Guarantee, in line with efforts to strengthen the Guarantee.[17]

4.2 Healthcare access

Out-of-pocket costs for medicines, vaccinations and prenatal checks remain a significant barrier for low-income and Roma families. Advocacy by the We Care Network, a coalition of 11 Roma and pro-Roma organisations coordinated by TSA[18], has contributed to **free prescription medicines for young children, free vaccinations against influenza and free prenatal examinations**. Monitoring should assess the actual use of health services by children and families in need, not only formal entitlement.

4.3 Healthy nutrition

Nutrition remains one of the least developed components of the Child Guarantee's implementation. A 12-month food voucher pilot scheme, run by TSA and the We Care Network in Peshtera and reaching 35 children aged 0 to 3 in households experiencing severe food insecurity, saw undernutrition fall **from 28.6% to 11.4% and the share of children showing age-appropriate development rise from 63% to 86%**.[19] Nutrition inequality extends beyond food insecurity: an estimated **41% of children from poorer families** are affected by obesity[20], underlining the need for a focus on healthier food, not just access to food, in any national response. Building on such pilots, Bulgaria should develop a permanent, adequately funded nutrition support scheme.

4.4 Early childhood education and care

The removal of nursery and kindergarten fees may have reduced direct financial barriers, but indirect costs, geographic disparities and quality concerns persist. An estimated **15,000 children aged two to seven** live in localities with no access to formal early childhood education and care, particularly in urban high-density Roma neighbourhoods.[21] TSA's community-based early learning programmes have shown that children can close developmental gaps within months: **communication scores improved by 13 percentage points and fine motor skills by 10**

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[16] Trust for Social Achievement, *Building a better future for all: urban planning in Roma settlements. A handbook for municipalities, NGOs, and communities in Bulgaria*.
[17] European Commission, *Breaking the cycle of child poverty: strengthening the European Child Guarantee*, 2026.
[18] Junction Bulgaria, *Final Evaluation report on development of the informal advocacy network of civil society organizations We Care*, 2023.
[19] Trust for Social Achievement, *Implementation of the European Child Guarantee in Bulgaria: Challenges and priorities,* p. 4, 2026.
[20] European Commission, *Staff Working Document reviewing progress made in the implementation of the Council Recommendation (EU) 2021/1004 of 14 June 2021 establishing a European Child* Guarantee, https://employment-social-affairs.ec.europa.eu/document/download/b66da2ac-90e9-4756-a31d-c1bac1e541b7_en?filename=Commission+Staff+Working+Document+-+Progress+Implemebtation+European+Child+Guarante.pdf p. 63, 2026.
[21] Data for Good, 2023.

percentage points after eight months of participation.[22] Monitoring should shift from tracking enrolment to tracking quality and developmental outcomes.

4.5 School education

Transport poverty, uneven provision of school meals and unequal participation in school excursions, sports and extra-curricular activities continue to affect children from low-income and Roma families, particularly beyond compulsory pre-school age.[23] An estimated **49.7% of AROPE children lack access to paid school trips or events, against an EU average of 16.9%,** and 52.8% lack regular leisure activities, against 24.1% across the EU.[24] Reliable, free transport, a national mechanism for free or subsidised school meals, and targeted financial support for participation in school life should be extended across all educational stages.

4.6 Segregation, discrimination and antigypsyism

Roma children remain disproportionately exposed to segregation and discrimination in education. In Bulgaria, the 2024 Roma Survey by the European Union Agency for Fundamental Rights found that **70% of Roma children attend a school where all or most pupils are Roma.**[25] Efforts to reduce segregation must not come at the cost of investment in the schools and services that vulnerable communities currently rely on. The fight against antigypsyism should be explicitly integrated into the planning, financing and evaluation of all efforts to implement the Child Guarantee.

4.7 Prevention of family separation

The number of children entering the child protection system remains high, at **around 2,000 every year**. However, this figure does not distinguish first-time entries from repeat placements, nor does it indicate whether family support measures were attempted before separation. A study by the KHC and the Childhood 2025 Coalition found that the child protection system predominantly responds to family crises through emergency placement rather than through prevention, pointing to significant gaps in tracing children's and families' trajectories through the system.[26] TSA's adaptation of the Nurse-Family Partnership model, *Together, Healthy Baby, Healthy Future*, supported over **700 economically vulnerable, first-time teenage mothers** from pregnancy until their child turned two, with positive effects on parenting skills, nutrition and early childhood development.[27] Bulgaria should scale up home visiting models of this kind as part of a coherent, prevention-oriented family support framework.

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[22] Trust for Social Achievement, *Implementation of the European Child Guarantee in Bulgaria: Challenges and priorities*, p. 9, 2026.

[23] Grekova M., *The path of Bulgarian secondary education*, Trust for Social Achievement, 2025.

[24] European Commission, *Staff Working Document reviewing progress made in the implementation of the Council Recommendation (EU) 2021/1004 of 14 June 2021 establishing a European Child* Guarantee, p. 111, 2026.

[25] European Union Agency for Fundamental Rights, *Roma Survey 2024: data and key findings*, 2025.

[26] Know-how Centre for Alternative Care for Children and Childhood 2025 Coalition, and Eurochild, Why are child-family separations in Bulgaria a matter of emergency?.

[27] De Laat J.J., Kraus H., and Van der Harst A.M.R., *Supporting first-time vulnerable mothers and their infants and toddlers: Evaluation study of the Nurse Family Partnership program Bulgaria*, Utrecht University, Centre for Global Challenges, 2023.

5. Governance, coordination and accountability

Implementation of the Child Guarantee cannot be delivered by a single ministry or through sector-by-sector reporting. It requires coordinated action across the Ministry of Labour and Social Policy, the Ministry of Education and Science, the Ministry of Health and the Ministry of Regional Development and Public Works, supported by a **robust inter-ministerial mechanism and common indicators**. Greater transparency is needed regarding the governance of implementation, including the membership, agendas and recommendations of the PEWG, which should be publicly available through an accessible online platform.

Overall, the participation of experts, civil society organisations, including Roma organisations, and of children and families themselves in planning and evaluation processes remains limited.

6. Roma children and meaningful participation

In Bulgaria, **61% of Roma children are at risk of poverty**[28], yet reporting on the Child Guarantee does not provide a systematic results series for Roma children across poverty, education, health, nutrition, housing and family support, so this priority group can remain statistically invisible when impact is assessed. Reporting on infant survival rates illustrates the same gap: Bulgaria's National Statistical Institute reports an overall infant mortality rate of 4.6 deaths before the age of one per 1,000 live births in 2025, but does not **publish data on infant deaths among Roma communities.**[29] This absence of data is not evidence that no inequality exists, it is itself a policy failure that requires a remedy.

Moreover, there is currently no **Roma organisation in the PEWG.** While Roma children are explicitly identified as a target group in the Council Recommendation, Bulgaria's National Action Plan does not name them as such. It lists 'refugee and migrant children, with a focus on unaccompanied or ethnic minority children'[30] as one of its six target groups, so Roma children are covered only as part of the broader category of children from ethnic minority backgrounds. Policies affecting Roma children cannot be effectively planned, monitored or evaluated without the systematic participation of organisations, practitioners and communities with direct experience of the barriers experienced by Roma communities. Representation must be meaningful, not only formal: being present in a working group but having no influence over agenda-setting, the design of indicators and report sign-off is not meaningful participation. In July 2025, a recommendation was submitted to the Child Guarantee National Coordinator calling for a consultative mechanism involving Roma organisations, field-based and community practitioners, and educational and health mediators. We reiterate this call.

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[28] European Union Agency for Fundamental Rights, *Roma Survey 2024: data and key findings*, 2025. https://fra.europa.eu/en/publications-and-resources/data-and-maps/2025/roma-survey-2024

[29] National Statistical Institute of the Republic of Bulgaria, *Crude death and infant mortality rates by place of residence, statistical regions, districts and sex*, 2025.

[30] Republic of Bulgaria, *Action Plan for Implementation of the Council Recommendation (EU) 2021/1004 Establishing a European Child Guarantee (2030)*, p. 6.

7. Joint recommendations for Bulgaria's European Child Guarantee

1. Adopt a national definition of **effective access** under the Child Guarantee, understood as the practical ability of children to reach, participate in and benefit from services, and not merely formal eligibility or enrolment.
2. Report on implementation with **process and outcome indicators** that demonstrate both systemic change and the concrete impact on children in target groups. Assign a stable identifier and status (completed, on track, delayed, not started or discontinued) to every measure, distinguish clearly between measures taken specifically in response to the Child Guarantee and other national policies, and introduce common indicators for coordination between key ministries, so that delays, duplication and re-labelling can be tracked transparently across reporting cycles.
3. Collect and publish **data disaggregated** by AROPE status, ethnicity, geographic location and household income, including data on unmet needs, so that the gap between children who need support and those actually reached can be measured.
4. Establish a robust **impact evaluation framework**, including independent evaluation that links investment and reform to measurable improvements in children's access to key services and children's well-being.
5. Recognise **housing security**, legal identity and civil registration as enabling conditions for effective access to services across all dimensions of the Child Guarantee.
6. Develop a permanent, adequately funded **nutrition support scheme for children** in food-insecure households and extend free or subsidised school meals progressively from pre-school or primary to secondary education.
7. Guarantee reliable, **free transport for pupils and students** at all educational stages, and provide targeted financial support for participation in school life beyond the classroom.
8. Integrate the fight **against antigypsyism** explicitly into the planning, financing, implementation and evaluation of all Child Guarantee measures, and ensure desegregation efforts do not reduce investment in the schools and services that vulnerable communities currently rely on.
9. Adopt the long-delayed **National Strategy for Children** and an updated **National Housing Strategy**, so that the Child Guarantee can operate within, rather than substitute for, a coherent national policy framework. There should be synergies between the Child Guarantee and the National Roma Strategic Framework.
10. Develop a reconciled **public finance annex for each measure** of Child Guarantee implementation, that separates state, municipal and EU funding sources, distinguishes planned and appropriated amounts from those actually spent, and that shows the recurrent domestic budget that will sustain the measure once EU co-financing ends.
11. Ensure the full and meaningful participation of one or more independent **Roma-led organisations** within the PEWG and other coordination mechanisms, alongside the participation of civil society, independent experts and families and children.

8. Conclusion

Bulgaria has made genuine progress in aligning its policies with the European Child Guarantee. Yet the evidence gathered by leading Bulgarian civil society organisations based on national statistics, direct engagement with the government's own monitoring process, and field-based programmes reaching thousands of children and families, points consistently to the same conclusion. **The gap between formal entitlement and effective access remains wide,** and falls most heavily on Roma children, children in poverty, and children in underserved communities. Closing that gap requires coordinated, outcome-focused actions built on reliable data and the meaningful participation of the organisations and communities closest to the children whom the Child Guarantee is meant to serve. We remain committed to working with the European Commission, the Bulgarian Government and our civil society partners to that end.

9. Full position papers

This joint paper draws on and summarises three separate position papers:

- Trust for Social Achievement *Implementation of the European Child Guarantee in Bulgaria: Challenges and Priorities* (2026).
- National Network for Children position paper on the implementation of the European Child Guarantee in Bulgaria (June 2026).
- Childhood 2025 Coalition opinion on the draft report on the implementation of the European Child Guarantee in Bulgaria (February 2026).

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