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DIALOGUE AND TOLERANCE

CONCEPT FOR

THE NEW NATIONAL STRATEGY FOR THE EQUALITY INCLUSION AND PARTICIPATION OF ROMA

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INTRODUCTION

Bulgaria is one of the countries with the most numerous Roma population. Efforts to formulate a comprehensive national policy for the integration of the Roma and to build a regulatory, institutional and financial framework for the implementation of this policy began in the mid-1990s. These efforts have continued with varying intensity up to this day.

During the period from 2012 to 2020, the framework for the implementation of Roma integration policies was set by the National Strategy of the Republic of Bulgaria for Roma Integration. The document was drafted in 2011 with the broad participation of stakeholders, including Roma civil society organisations, and was approved by a decision of the National Assembly on March 1st 2012. The national strategy was in line with the European Union Framework for National Strategies for Roma Integration.

On October 7th 2020, the European Commission published a renewed *EU Strategic Framework for Roma*

for Equality, Inclusion and Participation. It requires all Member States of the European Union to adopt their national strategies for equality, inclusion and participation of Roma with a horizon of 2030. The document and its annexes propose a wide range of topics, approaches and indicators to be included in the new national strategies, as well as guidelines for planning and drafting documents.

This report contains a proposal for a possible National Strategy for Equality, Inclusion and Participation of the Roma, which Bulgaria should develop by September 2021. It is a continuation of the analysis "Monitoring the implementation of the National Strategy for Roma Integration" published by the Friedrich-Ebert-Stiftung.[1] The report focuses on areas that the previous National Strategy had not advocated, or had implemented in an unsatisfactory manner - the equality of Roma women, the diversity of the Roma community, and monitoring of implementation. Proposals for some of the already existing priority areas are also presented.

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[1] The report is available at https://bulgaria.fes.de/publikationen

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NATIONAL STRATEGY OF THE REPUBLIC OF BULGARIA FOR THE INTEGRATION OF THE ROMA

The National Strategy of the Republic of Bulgaria for Roma Integration was developed in accordance with the Framework of the European Union for National Strategies for Roma Integration published by the European Commission. A wide range of institutions and non-governmental organisations as well as representatives of local authorities took part in preparing it. At the insistence of Roma organisations, the strategy was proposed for a vote in the National Assembly and approved unanimously on March 1st, 2012. The analysis "Monitoring the implementation of the National Strategy for Roma Integration" outlines the following strengths and weaknesses:

"The National Strategy of the Republic of Bulgaria for Roma Integration is an important step forward, continuing the tradition of developing good integration documents. Among the important merits of the National Strategy we can point out:

• It was adopted by a Decision of the National Assembly. This makes the strategy binding on all institutions, including those that are not directly subordinated to the executive branch - municipalities, the ombudsman, the Commission for Protection against Discrimination and others.

• Realistic national goals have been set for most of the priorities of the Strategy.

• A decentralised method of implementation is envisaged through a mandatory requirement for elaboration and adoption by a decision of the respective Municipal Council of municipal plans for integration of the Roma.

• There is an Action Plan for the implementation of the National Strategy.

• An important advantage is the inclusive way of preparing the Strategy through the participation of the civil sector and all stakeholders.

Despite the advantages mentioned, the National Strategy for Roma Integration contains many weaknesses that do not allow its implementation to lead to a real change in the state of Roma communities. Among the main weaknesses we can point out:

• The lack of appropriate administrative infrastructure for the implementation of integration policies.

• The lack of appropriate indicators and mechanisms for the monitoring and evaluation of implementation.

• A weak action plan, which only summarises the activities already performed by the various ministries, without consistency and without added value.

• The lack of commitment and political will on the part of the individual ministries - or at least a large number of them, for the implementation of the respective integration policies and their prioritisation.

A key obstacle to the implementation of the National Strategy for Roma Integration is the deepening of anti-Roma stereotypes and discrimination. The Rule of Law and Non-Discrimination priority in the National Strategy contains many gaps and weaknesses at both strategic and operational levels.[2]

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2 Kolev, D, Pamporov, A, Krumova T. (2020), *Monitoring of the Implementation of the National Strategy for the Integration of the Roma*, P19 Sofia. Friedrich-Ebert-Stiftung

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NEW EUROPEAN STRATEGIC FRAMEWORK FOR THE ROMA - PERSPECTIVE FOR A MULTI-FACETED APPROACH THAT REACHES ALL ROMA

On October 7th 2020, the European Commission published a Communication to the European Parliament and the European Council entitled "A Union for Equality: An EU Strategic Framework for Roma Equality, Inclusion and Participation" and its annexes, "Guidelines for the Planning and Implementation of National Roma Strategies" and "Portfolio of indicators"[3].

The Commission also proposed that the Council of the European Union should approve new Council Recommendations, which should be materialised through "soft legislation" in the spirit of the new European framework. On March 12th 2021, the European Council approved Recommendations on Roma equality, inclusion and participation.[4]

These documents form a new European political and legal framework, through which the institutions of the European Union are committed to supporting, supervising and monitoring the targeted efforts of the Member States for Roma equality, inclusion and participation.

The need for a new European framework to continue the targeted efforts for the integration of Roma at European and national level became clear in 2016. The conclusions of the European Council "Accelerating the process of Roma integration" from 2016 require the European Commission to prepare a new strategic framework for after 2020, together with proposals for new Council Recommendations.

The document "Union for Equality…" itself clearly argues for the need to continue targeted Roma integration efforts with the remaining challenges, despite the successes achieved in some areas: "overall **progress in Roma integration** over the last 10 years is limited, although there are significant differences between policy areas and between separate countries countries[5].

Education is the area in which the greatest progress has been made, mainly by reducing early school leaving and improving participation in early childhood education and compulsory education. However, cases of segregation of Roma students in education have increased[6]. The risk of poverty among Roma has decreased and perceptions of their own health have improved, but health insurance among them remains limited. Access to employment has not improved, and the share of young Roma who are not employed in work, study or training has even increased. The housing situation remains difficult, most of all because of segregated and poor housing. There is evidence of some reduction in discrimination against Roma and greater acceptance of Roma by the general population. However, anti-Gypsyism, hate crimes and trafficking in Roma, especially women and children, remain a matter of serious concern[7]." [8]

The Communication describes a broad process of consultation with all stakeholders, including civil society organisations, on the development of the new strategic framework: "This strategic framework is based on the findings of the evaluation of the previous framework, extensive consultation[9], annual evaluations of

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3 The full package of documents is available at https://ec.europa.eu/info/policies/justice-and-fundamentalrights/combatting-discrimination/roma-eu-roma-equalityinclusion-and-participation-eu_bg
4 The recommendations are available at https://eur-lex.europa.eu/ legal-content / EN / ALL /? Uri = CELEX: 52020DC0621

5 Report on the evaluation of the EU Framework for National Roma Integration Strategies until 2020 (COM (2018) 785 final).
6 Pursuant to Council Directive 2000/43/EO of the Council of June 29th 2000 regarding the implementation of the principle of equal treatment between persons irrespective of racial or ethnic origin (the Racial Equality Directive), the Commission initiated proceedings to establish -destruction against three countries (Czech Republic, Hungary and Slovakia) due to school segregation of Roma children.
7 Report on the evaluation of the EU Framework for National Roma Integration Strategies until 2020 (COM (2018) 785 final).
8 Communication to the European Parliament and the European Council "Union for Equality: An EU Strategic Framework for Roma Equality, Inclusion and Participation", p.2. available at https://eur-lex.europa.eu/legal-content/EN/ALL /? Uri = COM: 2020: 620: FIN
9 Cf. the accompanying Commission Staff Working Document (SWD (2020) 530 final, Annex 1).

national strategies[10] and analysis of the reasons for the limited effectiveness of the previous measures[11]. It is in response to calls from the European Parliament, the Council and civil society for a stronger EU initiative after 2020[12,13].

What is new in the new European Strategic Framework for Roma? We can highlight at least five things. First, a multifaceted approach is proposed that combines the social inclusion approach with anti-discrimination and the fight against anti-Roma discrimination, promoting Roma participation and taking into account the diversity of the Roma community. The European Framework for National Roma Integration Strategies from 2011 emphasises the approach of social inclusion, setting goals for improving access to education, health care, employment, and housing. This approach remains an important part of the proposal for the new European framework. At the same time, the topics of anti-Gypsyism and Roma participation are included, which were not covered by the previous framework. The change finds its nominal expression in the replacement of the concept of "integration" with the trinity of "equality, inclusion and participation". It refers to the Roma not as a marginalised group, but as a disenfranchised minority that is discriminated against. For a long time, the European Commission's support for Roma has been part of support for vulnerable groups and / or marginalised communities. The new European framework sets a new discourse by including the themes of equality and participation. As the new policy framework states: "In order to make greater and faster progress, this Communication presents a new EU strategic framework for the Roma, promoting effective **equality**, socio-economic **inclusion** and meaningful Roma **participation** […] It recognises that, although not all Roma are subject to social exclusion, they may all be discriminated against and disenfranchised. It takes a cross-sectoral approach that takes into account the combination of ethnicity with other aspects of identity and how these inter-relationships contribute to unique manifestations of discrimination.[14]"

Anti-Roma stereotypes and prejudices, the overall growth of anti-Gypsyism and the lack of real Roma participation are key barriers to raising the social status of the Roma community. Without tackling anti-Roma discrimination and ensuring Roma participation, it is a hard task to improve the education, employment, health and housing conditions of Roma. The new European framework requires nation states to take action to tackle anti-Gypsyism and increase Roma participation, together with action to raise the educational, health, employment and housing status of Roma.

Secondly, in line with the above, the Commission sets common objectives at the European Union level in seven areas. In addition to the current education, health, employment and housing conditions, goals have been added on overcoming anti-Gypsyism, inclusion and participation. The general goals are:

- Reducing by at least half the proportion of Roma who have experienced discrimination.

- Doubling the proportion of Roma who file a complaint when faced with discrimination.

- Halving the poverty gap between Roma and the rest of the population.

- Reducing by at least half the difference in participation in early childhood education between Roma and the rest of the population.

- Reducing by at least half the number of Roma children attending segregated primary schools in Member States with a significant Roma population.

- Reducing by at least half the employment gap and the gender employment gap.

- Reducing the difference in life expectancy by at least half.

- Reduction of the gap in the number of homeless by at least one third.

- Ensuring that at least 95% of Roma have access to tap water.

Third, the European Commission is proposing target results for each of the seven targets to be achieved by 2030[15], which are significantly more ambitious than the results set in the 2011 framework. The proposed target results have a quantitative dimension and are based on specific data on the current situation, which are provided by studies of the Agency of the European Union on fundamental human rights.

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10 [COM (2019) 406, SWD (2019) 320, all annual reports.](#)
11 [Meta-assessment of interventions aimed at Roma inclusion.](#)
12 Cf. [European Parliament, 2020](#) and [2019, Council, civil society](#).
13 Communication to the European Parliament and the European Council "*Union for Equality: An EU Strategic Framework for Roma Equality, Inclusion and Participation*", p.3, available at [https://eur-lex.europa.eu/legal-content/EN / ALL /? Uri = COM: 2020: 620: FIN](#)
14 Communication to the European Parliament and the European Council "*Union for Equality: An EU Strategic Framework for Roma Equality, Inclusion and Participation*", pp. 3-4, available at [https://eur-lex.europa.eu/legal-content / EN / ALL /? Uri = COM: 2020: 620: FIN](#)

15 Communication to the European Parliament and the European Council "*Union for Equality: An EU Strategic Framework for Roma Equality, Inclusion and Participation*", pp.5-6, available at [https://eur-lex.europa.eu/legal-content / EN /ALL /? Uri = COM: 2020: 620: FIN](#)

ENSURING EFFECTIVE EQUALITY, INCLUSION AND PARTICIPATION
HORIZONTAL GOALS AND TARGET RESULTS BY 2030

Red: The target set at EU level for minimum progress must be achieved by 2030.
Green: minimal progress regarding the Roma needs to be achieved by 2030
Blue: the latest available data against which progress will be measured

1. Counteracting and preventing anti-Gypsyism and discrimination

Reduce by at least half the share of Roma who have been subjected to Discrimination

- to ensure that by 2030 less than 13% Roma are discriminated against;
- *Roma who have been discriminated against: 26% (in the last 12 months), 41% (in the last 5 years).*

Reduce by at least one third the share of people from the general population who do not they like to have Roma as neighbors

- to ensure that by 2030 the people who don't like having Roma as neighbors are less than 30%;
- *The proportion of people in the total population whodo not like to have Roma as neighbors - 46%.*

2. Reducing poverty and social exclusion in order to overcome socio-economic differences between Roma and the general population

Reducing by at least half the difference in the level of poverty among Roma and the general population

- ensuring that by 2030 the majority of Roma will overcome poverty;
- *Proportion of those "at risk of poverty": Roma - 80%; total population - 16.8% (difference 63.2 percentage points).*

Reducing by at least half the difference in poverty among Roma children and other children

- ensuring that by 2030 the majority of Roma children will overcome poverty;
- *Roma children - 85%; total children - 19.6% (difference 65.4 percentage points)*

3. Encourage participation through empowerment, cooperation and trust

Capacity building and commitment of at least 90 non-governmental organisations (NGOs) in coordinated monitoring by the Roma civil society throughout the EU

- *NGOs participating in the monitoring project by Roma civil society (Roma Civil Monitor) - 85.*

Ensuring the participation of Roma NGOs such as full members in the national monitoring committees
for all needs-oriented programmes of Roma communities.

Doubling the proportion of Roma who give a signal when subjected to discrimination

- ensuring that by 2030 at least 30% of Roma victims of discrimination, give a signal;
- *share of Roma who reported about the last case in which they were discrimined against (in any area) over the last 5 years - 16%.*

Promoting Roma participation in local political life, regional, national level and at EU level
(in Member States with a significant share of Roma population)

- ensuring that Roma register as voters, vote, and participate in elections as candidates.

SECTORAL OBJECTIVES

4. Increasing effective equal access to quality inclusive general education systems

Reducing by at least half the difference in participation in education and early childhood care

- ensuring that by 2030 at least 70% of Roma children are covered by pre-school education;
- *participation in education and early care children (3+): Roma - 42%; total population - 92.2% (difference 50.2 percentage points).*

Reducing the gap in those completing secondary education by at least one third

- ensuring that by 2030 the majority of Roma youth will complete at least secondary education
- *proportion of those with secondary or higher education: Roma - 28%; total population - 83.5% (difference 55.5 percentage points)*

Measures to eliminate segregation by at least halving the proportion of Roma children attending segregated primary schools (in Member States with a significant Roma population)

- ensuring that by 2030 fewer than one in five Roma children attends a school in which most or all of the children are Roma
- *Roma children attending schools in which most or all children are Roma - 44%.*

5. – effective equal access to quality and sustainable employment

Reducing the difference in employment by at least half

- ensuring that by 2030 at least 60% of Roma people have paid work;
- *in paid work: Roma - 43%; total population - 73.1% (difference 30.1 percentage points).*

Reducing the difference in gender employment among Roma by at least half

- ensuring that by 2030 at least 45% of Roma women have paid jobs;
- *employment gap between the sexes: Roma - 27 percentage points (women - 29%, men - 56%); difference in the total population - 11.7 percentage points (women - 67.2%, men - 78.9%).*

Reducing by at least half the difference in the proportion of those not engaged with work, study or training

- ensuring that by 2030 fewer than one in three young Roma are not engaged with work, study or training;
- *proportion of those not engaged with work, study or training (16 - 24 years): Roma - 62%; total population - 10.1% (difference 51.9 percentage points).*

6. Improving the health of Roma and increasing effective equal access to quality health and social services

Reducing the difference in life expectancy by at least half

- ensuring that by 2030 Roma women and men live 5 years longer;
- *difference in life expectancy at birth (total population compared to Roma): Roma women - 10.4 years; Roma men - 10.2 years.*

7. Increasing effective equal access to appropriately non-segregated housing and basic services

Reducing by at least one third the difference with regard to the proportion of inhabitants of housing with extremely poor conditions

- nsuring that by 2030 the majority of Roma people do not live in housing with extremely bad conditions;
- *housing with extremely poor conditions: Roma - 61%; total population - 17.9% (difference 43.1 percentage points)*

Reducing the difference in overcrowding by at least half

- ensuring that by 2030 the majority of the Roma no longer live in overcrowded households;
- *overcrowding: Roma - 78%; total population - 17.1% (difference 60.9 percentage points).*

Ensuring that at least 95% of Roma have access to running water

- *access to running water in the household: Roma - 70%, total population - 97.7%.*

Fourth, the new European framework marks heightened requirements by the European Commission for national governments and action at a national level. Although the overall distribution of responsibilities for the implementation of Roma policies between Member States and the European Commission remains the same, the new framework imposes significantly stricter requirements on Member States and their national strategic frameworks. Whilst the 2011 European Framework gave national governments full autonomy to decide for themselves what to include in national Roma integration strategies, the new European Framework set requirements for national strategic frameworks that must be respected by all Member States. National documents must follow certain specific common characteristics to make minimum overall commitments, depending on the national context to make additional commitments. In addition, there are also requirements for commitments from countries with large Roma populations, one of which is Bulgaria.

The European Commission proposes that all national strategic frameworks follow the approach set at European level, which combines social inclusion, anti-discrimination and increasing Roma participation. The Commission requires all national strategic frameworks to include the following minimum requirements:

The national strategic framework should contain[16]:

1) *national baseline values and national targets for achieving the EU's targets and targets based on a comprehensive needs assessment;*

2) *targets and measures for specific groups (Roma children, women, young people, Roma adults or Roma with disabilities, mobile citizens of the EU, third-country nationals, stateless Roma) to take into account Roma diversity, including measures encompassing gender-specific characteristics, children's needs and the age dimension;*

3) *measures to combat anti-Gypsyism and discrimination (e.g. through national action plans to combat racism);*

4) *measures to ensure the socio-economic inclusion of marginalised Roma, in particular in the fields of education, employment, health and housing;*

5) *a combination of targeted and common measures, taking into account specific local challenges, and ex-*

plicitly aimed at addressing obstacles that deprive Roma of equal access to common policies[17];

6) *a special budget for implementation and monitoring*[18], *which makes full use of social innovation and private capital;*

7) *mechanisms for reporting, monitoring and evaluation of the progress towards the goals set;*

8) *a system of policy consultations and cooperation with Roma and pro-Roma civil society, line ministries, bodies engaged with matters of equality, other national human rights institutions, and other stakeholders;*

9) *building the capacity to promote the active participation of civil society at all stages of policy-making and to ensure its participation in the processes of national and European platforms.*

In addition to these minimum requirements, the Commission proposes others, depending on the national context:

The national strategic framework should also contain[19]:

1) *national quantitative and qualitative targets for all seven EU targets and connected target results (depending on available data);*

2) *how EU and national funds and financial instruments will be invested in support of the Roma; and*

3) *how institutional or administrative reforms will contribute to equality and inclusion.*

It has also been suggested for countries with large Roma populations, i.e. with more than one percent Roma, to include general additional commitments in their national strategic frameworks for Roma[20]:

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16 Communication to the European Parliament and the European Council "Union for Equality: An EU Strategic Framework for Roma Equality, Inclusion and Participation", p.9, available at https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=COM:2020:620:FIN

17 The general basic principles for Roma inclusion provide a framework for the successful development and implementation of actions in support of Roma inclusion. Principles 2 and 4 stipulate a combination of targeted and general measures.

18 Programming by Member States of the specific objective of the ESF + promoting the socio-economic integration of marginalised communities, with Roma having to meet all the requirements of Annex IV of the Commission Proposal for a Regulation on the general provisions for the period 2021-2027 regarding thematic beneficial conditions for the national strategic frameworks for Roma. Several other EU funding instruments, such as cohesion policy funds, can be used for equality and inclusion of Roma.

19 Communication to the European Parliament and the European Council *"Union for Equality: An EU Strategic Framework for Roma Equality, Inclusion and Participation"*, p.10, available at https://eurlex.europa.eu/legal-content/EN/ALL/?uri=COM:2020:620:FIN

20 Communication to the European Parliament and the European Council *"Union for Equality: An EU Strategic Framework for Roma Equality, Inclusion and Participation"*, p11, available at https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=COM:2020:620:FIN

1) *to contain a plan or set of measures to prevent and combat anti-Gypsyism and discrimination, segregation in education and housing, as well as prejudices and stereotypes against Roma (including legibly online);*

2) *to integrate the aspects of equality and inclusion of Roma at regional and local level; and*

3) *to indicate the ways in which the national and EU funds and the financial instruments will be invested for the reform of common policies with the aim of including in them the issues of Roma and targeted actions.*

These requirements undoubtedly also apply to Bulgaria, which is the country with the highest percentage of Roma, according to the European Commission and the Council of Europe.

Fifth, the new framework proposes strengthening the mechanisms for reporting, monitoring and evaluation at national and European level. A special Portfolio of indicators should be used to gather the necessary information on the progress of the implementation of Roma policies in all Member States. Individual countries, and in particular national contact points, should report every two years to the European Commission on how they are implementing their national strategic frameworks. National reports need to be made public, discussed with a wide range of stakeholders, and discussed in national parliaments. The final requirement is innovative. Bulgaria is one of the few countries that even in 2012 approved the National Strategy for Roma Integration with a Decision of the National Assembly. Subsequently, although only twice, reports on its implementation have been discussed in parliament. At the level of the European Union, the Commission will review not only the national reports, but it will also continue the practice of supporting the preparation of Citizens' Monitoring Reports.

4

THE NEW NATIONAL STRATEGY FOR THE INTEGRATION, INCLUSION AND PARTICIPATION OF ROMA: NECESSARY NEW ELEMENTS

The new National Strategy for Roma Equality, Inclusion and Participation must preserve the best achievements of the already completed National Strategy for Roma Integration, and must also take advantage of the opportunities provided by the new European framework. The proposals of the European Commission have been confirmed and transposed into law by the European Council. For Bulgaria, as one of the countries with a large Roma population, all the requirements apply. They can be summarised in several points:

1. The fight against anti-Gypsyism should be a new independent priority. "Annex 1: Guidelines for the planning and implementation of national strategic frameworks for the Roma" clearly requires that the fight against anti-Gypsyism should not only be a horizontal priority but also an independent priority. The application proposes eight priority goals[21] that are fully relevant for Bulgaria. Of course, they can be amended or supplemented.

One of the priorities of the National Strategy of the Republic of Bulgaria for Roma Integration is the rule of law and non-discrimination. The same is preserved in the draft new strategy, published in December 2020. Written in such a way, this priority - both in the previous strategy and in the project for a new one - rather partially touches upon, and does not adequately cover, problems on four different topics: anti-Roma attitudes, Roma women, Roma participation and the problematic issue of law enforcement in Roma neighbourhoods. In all situations, the proposed priority "Rule of Law and Non-Discrimination" does not cover the broad concept of anti-Gypsyism incorporated into in the European framework. It is necessary to divide it into three separate priorities: combating anti-Gypsyism, equality of Roma women and strengthening Roma participation.

2. To adequately reflect the diversity of the Roma community in Bulgaria as follows:

2.1. The inclusion of a chapter "Equality of Roma women", which the challenges facing Roma women, children and young people should be reflected.

2.2. The inclusion in the priorities of education, health care and employment of goals aimed at overcoming the unequal situation and challenges for Roma women, as well as for children and young people of Roma origin.

2.3. The inclusion in all priorities of priority goals and activities aimed not only at the marginalised setors of the Roma community, but also at those Roma with better education and social status. The latter also face many challenges, such as anti-Gypsyism, segregation, the need to preserve ethnocultural identity and others.

2.4. The inclusion in the preamble of the Strategy of a paragraph indicating that the term "Roma" in the document refers to a wide range of groups, some of which do not self-identify as Roma, but face similar problems and are perceived as Roma by the surrounding population. This text could repeat the text of the National Strategy of the Republic of Bulgaria for Roma Integration[22] or adapt to Bulgarian conditions the analogous text of the European framework[23].

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22 In its Introduction, the NSRBIR states: "This document uses the name Roma as a generalisation both for the Bulgarian citizens in a vulnerable socio-economic situation, who self-identify as Roma, and for the citizens in a similar situation, which the surrounding population defines as such, regardless of the manner of their self-determination."

23 The new European framework repeats a text from previous European Commission documents on Roma: 'The term "Roma" is used as a general term to refer to a number of different people of Roma origin, such as Roma, Sinti, Kale, Gypsies, Romanesque and Painters / Miners. It also covers groups such as Ashkali, Gyupti, Yenish, Dom, Lom, Roma and Abdal, as well as itinerant communities, including Travellers and groups denoted by the administrative term "gens du voyage" (travelling people), as well as people who self-identify as gypsies (gypsies, tsiganes or tziganes), without denying the specific characteristics of these groups.'

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21 *Annex 1: Guidelines for the planning and implementation of national strategic frameworks for Roma, p. 1.*

3. The inclusion of a new priority "Promoting Roma participation". As the new European framework points out: *"Support for the full participation of Roma in policy-making at local, national and European level is a necessary condition for the overcoming of exclusion. Something that is particularly important is the role of civil society organisations that are led by Roma or carry out activities in support of Roma."*[24] It is therefore recommended that:

The national strategic frameworks for Roma should:

• *define minimum mandatory aspects and channels for Roma participation in policy development, implementation and monitoring, as well as in the programming of EU funds, including through written participation protocols specifying the mandate (the scope and nature of commitment), the composition (principles for the selection of members), the working methods and the expected results of the work of the consultational and participatory bodies, in order to ensure effective cooperation, trust and accountability[25];*

• *open opportunities for empowerment of Roma communities at the local level, so as to create the preconditions for community engagement and community actions aimed explicitly at achieving social and political change. The mobilisation of communities should be seen as a targeted inclusive process involving Roma, local authorities and organisations;*

• *ensure that Roma are represented in their full diversity (including local citizens and foreigners, marginalized and integrated people, women, children and young people) in policy-making and consultation processes;*

• *contribute to the improvement of activities at the local level by engaging more specialists from Roma communities who would assume the role of mediators and help overcome the persistent lack of trust between Roma communities and communities of the majority;*
promote cooperation in civil society between Roma organisations and other organisations, especially those aimed at protecting the rights of children, young people and women;

• *use EU funds and other means to regularly support capacity building (for equality screening,*

participation, etc.), in particular for civil society organisations operating at a local level; and

• *in countries with a significant proportion of Roma in the population:*

  – *promote positive actions to increase the participation of Roma in the national and local administration in the field of equality and inclusion, research, etc.;*

  – *provide for the possibility of establishing national representative Roma organisations for ongoing consultation and participation in policy discussions. These organisations should receive basic institutional grants from national governments or regular support for civil society."*[26]

Given the fact that Roma participation in Bulgaria is at an extremely low level in every respect, the inclusion of such a priority in an explicit manner is imperative.

4. Reorganisation of the four priorities in the field of social inclusion (education, health, housing and employment), as well as of "Culture and Media" in a manner consistent with the requirements of the new framework. In each priority there should be a strategic goal that is in line with the goals set at European level; priority goals; priority measures for their achievement, as well as quantitative indicators for the initial level and result expected by 2030.

5. Development of an annex "Plan of measures to combat anti-Gypsyism, discrimination, segregation in education, anti-Roma stereotypes and prejudices". This plan must envisage concrete measures for creating a favourable public environment for the implementation of integration policies. The activities should be provided financially, with a responsible institution or organisation. It is necessary to provide for the active participation of civil society organisations in this process.

6. Inclusion of an application with planned operations to support the implementation of the National Strategy. These operations can be from the European Structural and Investment Funds, the Norwegian Financial Mechanism, the Bulgarian-Swiss Cooperation Programme[27], or the national budget. Such an annex was made in 2011, long before it was requested by the European Commission, but unfortunately it was not adopted for technical reasons.

The new National Strategy for Roma Equality, Inclusion and Participation should continue and further develop the main positive aspects of the current National Strat-

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24 *Annex 1: Guidelines for the planning and implementation of national strategic frameworks for Roma,* p. 4.
25 Violetta Zentai, Georgeta Munteanu, Simona Torotcoi, The quality of participation in a post-2020 EU initiative for Roma equality and inclusion expert reports , which further develop some aspects of the evaluation of the EU framework for future-oriented national Roma integration strategies, 2020, pp. 41, 59-60.

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26 *Annex 1: Guidelines for the planning and implementation of National Strategic Frameworks for Roma,* p. 4.
27 https://swiss-contribution.bg/en

egy of the Republic of Bulgaria for Roma Integration until 2020. Some of the strengths and innovations of the previous strategy are included as proposals in the new European framework. Among them we can mention:

1. the adoption of the National Strategic Framework for Equality, Inclusion and Participation of Roma by the National Assembly; the discussion and the adoption of the annual reports on the implementation of the Strategy by the legislature.

2. the imposing of the obligation for each municipality to develop and adopt with a decision of the Municipal Council a municipal plan for equality, inclusion and participation of Roma.

3. the development of an action plan for the implementation of the National Strategy with a stipulated budget, responsible institution, deadlines and indicators.

4. the active participation of Roma and pro-Roma civil society organisations in the elaboration of the National Strategy and Action Plan.

5

CURRENT MONITORING AND EVALUATION: THE MISSING UNIT

The National Strategy for Roma Integration in Bulgarian Society contains a chapter on "Performance Monitoring", which is related to a functioning online monitoring system[28]. The purpose of the monitoring is "through systematic collection and analysis of information to monitor the achievement of measurable results from the implementation of the measures under the planning document, as well as to actively involve stakeholders in carrying out the evaluation and monitoring" (NSRBIR, p.13) . For this purpose, 6 steps are laid out:

1. The progress in the implementation of the set activities on the priorities of the plan shall be reported in an administrative monitoring report.

2. The Secretariat of the National Council for Cooperation on Ethnic and Integration Issues (NCCEII) shall coordinate and summarise the information received in the report.

3. The discussion of the report shall be carried out within the Commission for Integration of Roma and the agencies involved in the implementation of the Action Plan.

4. The report shall be submitted for approval to the NCCEII

5. The report shall be adopted by the Council of Ministers.

6. The Council of Ministers shall submit for adoption to the National Assembly an annual report on the implementation of the Strategy by April 20th of the following year.

In the new strategy paper, this procedure is reduced to four steps:

1. The NCCEII Secretariat shall coordinate the preparation of the report, summarise the information and prepare a draft report.

2. The discussion of the report shall take place within the Commission for implementation of the National Strategy.

3. The report shall be submitted to the NCEEII for approval.

4. The report shall be adopted by the Council of Ministers.

The six-step system, however, leads to the generation of huge but empty documentation when it comes to useful content. Annually, monitoring administrative reports are prepared and adopted, which are full of administrative clichés about the great successes of the administration (without reflection on the failures and lessons learned), which are inconsistent and do not allow tracking of related time lines; which are narrative and do not allow for any adequate measurement of effectiveness, efficiency and impact. This article is an attempt to identify weaknesses in the monitoring system and to make preliminary proposals in order to improve the Monitoring System, with an emphasis on ongoing monitoring and the activities necessary at grass roots level.

5.1 LACK OF WORKING DEFINITIONS

A fundamental problem of the monitoring of the implementation of the NSRBIR, as well as of the monitoring, control and evaluation system is the complete absence of working definitions and relevant metadata (i.e. information on the type and quality of data: who collects them, how they collect them, how often, how the quality and reliability are controlled, who summarises them, how they are anonymised, etc.) according to the indicators collected. The problem with a lack such as this is

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28 https://nrcpsystem.government.bg/SitePages/%D0%9D%D0%B0%D1%87%D0%B0%D0%BB%D0%BD%D0%B0%20%D1%81%D1%82%D1%80%D0%B0%D0%BD%D0%B8%D1%86%D0%B0.aspx

that in this way it is not possible to form the same understanding of the monitoring and indicators among the different responsible experts in the given interested institutions, which ultimately leads to the generation of inconsistent information. For this reason, some basic clarifications are proposed below, which should be included in a new normative document, regulating the functioning of the monitoring system and the reporting in connection with the new strategic framework with a horizon of 2030.

- *Monitoring*

Monitoring is a mechanism for the ongoing evaluation of the implementation of public policies, according to pre-established detailed criteria for relevance, effectiveness, efficiency, impact and sustainability. The purpose of monitoring is to monitor the progress of implementation in a timely manner and to remove possible obstacles at the time of their occurrence, regardless of their nature.

- *Monitoring system*

The monitoring system is a public instrument whose aim is to ensure transparency in the implementation of public policies. Apart from the values of the indicators, the monitoring system should contain comprehensive metadata for each indicator observed, so as to ensure the verifiability, comparability, reliability and unambiguity of the interpretation of the relevant numerical values. It is recommended that the monitoring system should contain information on all normative documents concerning the implementation of the given public policies, so that their relevance can be ensured, as well as its elements: credibility, feasibility and acceptability.

- *Relevance*

The relevance shows the extent to which the planned policies meet the needs of the various stakeholders, the extent to which they can be implemented in Bulgaria, as well as the possible practical approaches in the implementation of the respective policies.

In order for the appropriateness of the measures and activities to adequately assessed, preliminary information should be available in relation to each measure in terms of the parameters of the problems observed in time, place and scope:

- when the problems are observed (i.e. whether the given phenomenon exists constantly or has a cyclical / seasonal character);

- where the respective problem is observed (regions, municipalities, types of settlements, types

of educational institutions, sectors of the economy, etc.);

- how many people (or how many households) are likely to be directly or indirectly affected by the problem. When assessing the reach and identifying the target population groups, the following aggregates should be taken into account:

  • *People at risk* - a subset of the population who are likely to be affected by the given policies (either in a negative or in a positive way).

  • *People in need* - a subset of the population in a situation where the policies are intended to have a specific impact (e.g. under-age mothers, children outside the education system, households at risk of eviction, and long-term unemployed people over 55 years of age).

  • *People of necessity* - some of the people in need who would agree to accept the policy and the risk of its implementation.

- *Credibility*

Credibility is an essential element in assessing the appropriateness of a given public policy. The reason for this is that in the implementation of public policies it may come to pass that there is a discrepancy between the goal declared and the actual result to be achieved when, in fact, the measures and activities planned do not meet the needs of the target groups. Unfortunately, such a phenomenon is repeatedly observed in the implementation of the NSRBIR, for example with regard to intercultural education, prevention of early births, training for work in a multiethnic environment, the provision of social housing and improvement of housing conditions, etc. The main issues with which credibility can be assessed are:

- *Are the goals well defined?* (i.e. whether specific achievements are set, e.g. "providing access to drinking water", "renovation of buildings built before 1989", etc., or is the wording vague, abstract and open to interpretation, e.g. "improving housing conditions"?);

- *Are the expected results well defined?* (i.e. are there clear quantitative indicators formulated, e.g. "30 teaching hours for 2000 primary teachers", or are the results unclear, abstract and open to interpretation e.g. "conducting training for primary teachers"?);

- *Are the procedures for the identification of the target groups of the population clear and*

transparent? (i.e. are the criteria for vulnerability and the need for social support or intervention clearly defined – e.g. overcrowding, lack of transport, lack of specific infrastructure, etc. or are vague and abstract definitions used, e.g. "persons n a vulnerable situation"?)

- *Are the services and policies being offered sustainable and sufficient?* (i.e. what is being proposed, will it solve the problem once and for all, or will it postpone the problem over time without finding a permanent solution?)

- *Are the activities and the functional mechanism of the policies well described?* (i.e. is it clear who should act, on what, when, how much, for whom, in what way and in what quantity?)

- *Are there enough funds provided?* (i.e. is there a preliminary plan-account of how much money should be provided from the state budget or through other funds, or is there only an abstract indication of budget items and potential sources?)

▪ *Feasibility*

The second important element in the assessment of relevance is the feasibility of the planned public measures, i.e. to what extent what is planned is likely to actually be realised. Feasibility is based on an assessment of the strengths and weaknesses of a policy, taking into account the following frameworks:

- contextual risks (legislation, political will, the economic situation, social attitudes and prejudices);

- parametric risks (time, budget, human resources, scope of the target group);

- technical risks (i.e. those which arise from poor definition of the problem or target group; mismatch of measures to needs).

It is extremely important in this respect to make a preliminary analysis of the "integration gap"[29], comparing the baseline situation (i.e. in this case as of 2020 with the desirable situation at the end of the programming period (2030).

▪ *Acceptability*

The third essential element in clarifying relevance is the assessment of the acceptability of public policies. In this case, an assessment of the knowledge, attitudes and practices of the stakeholders at the mo-

ment should be made. It is precisely in this case that it is extremely important to assess people at risk, people in need and people of necessity; to be complemented by an analysis of the institutional sphere (public policies and the civil sector).

▪ *Effectiveness*

Effectiveness assesses the extent to which the preset goals for changing the existing problem situation have been met. The monitoring in this case should monitor the extent to which the specific indicators for outputs, short term outcomes and long term outcomes have been achieved within the period considered.

▪ *Efficiency*

Efficiency determines whether and to what extent the measures and activities are implemented with the most optimal expenditure of money, human resources and time, while achieving the best quality. It is important to underline that the emphasis in efficiency is precisely on quality and therefore not always the cheapest, nor the fastest is the most efficient.

The analysis of the cost-benefit ratio should be carried out in a comparative plan and in this respect it would be very useful for the monitoring system to contain data that have a comparable character in terms of territorial scope (e.g. municipality, district), the period of scope of data, and the set of indicators that concerns the respective territorial units.

At present, not all data are comparable, as there is a discrepancy in the reporting documents of the Ministry of Education and Science, the Ministry of Health and the Ministry of Labour and Social Politics, both in terms of territorial distribution (e.g. the distribution of employment offices) and in terms of time range (e.g. the Ministry of Education and Science reports in "academic years"). In this case, it is important to emphasise that the fact that different administrations work with different territorial structures does not mean that it is not possible for these structures to submit information that is aggregated and corresponds to the given municipal or district level. Similarly, the fact that the education system is based on academic years presents no obstacle to the data on the scope of students or their dropping out of school from being fixed on a specific date, e.g. January 1st, July 1st or October 1st in the respective year.

▪ *Impact*

The impact must assess the extent of the long-term impact (desired change or stabilisation) with regard

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29 So-called 'gap' analysis)

to stakeholders. The impact is assessed comprehensively using the so-called theory of change, i.e. the results which are desired are compared with the results achieved in terms of the social environment. The evaluation of impact considers the model as a whole and takes into account the planned *resources*, the planned *activities* and, accordingly, the *direct results* (outputs) and *consequences* (outcomes) achieved. The effects should be measured as a change in the characteristics of the target population groups or social conditions, rather than as a change in policies or programme priorities. Five evaluation indicators are key in this regard:

- *level achieved, i.e. what has been achieved in the intermediate stages and at the end of the reference period;*

- *scope of the change over time, i.e. what are the differences between the separate stages of realisation (at least the beginning-end moment);*

- net direct effect of the policies, i.e. what part of the change / consequences is due to the specific policies (and - where possible - what is due to additional / external factors);

- planned (i.e. expected) effects;

- additional (unplanned / unexpected) effects.

A very important element of the impact assessment is the assessment of the actual realisation and, accordingly, the precision in relation to the model of the theory of change (fidelity). Ultimately, it must be monitored whether the pattern of change is followed and whether the activities reach the target groups. This is an extremely important component of monitoring, as the changes in the field of public policies are related to complex chains of actions and activities, and the desired end result cannot be achieved unless a carefully planned algorithm is followed. In this case, care must be taken to ensure that the ineffectiveness of a policy and, consequently, the lack of impact are not due to ineffective or incorrect implementation, rather than to an erroneous theoretical model. In other words, the assessment of precision avoids the mistake of rejecting a good innovation policy as ineffective, due to incorrect application at lower levels.

- *Sustainability*

Sustainability clarifies the possibility of successful policies becoming a permanent public policy with a reduced need for ongoing additional incentives and resources. Sustainability is directly related to the concept of *dynamic efficiency* (i.e. whether continuous improvement / growth of target results has been achieved) and whether it is possible after the initial investment of planned resources to self-sustain / support the policies as a resource.

An example of unsustainable policies is the continuous training of new staff (due to staff turnover, for example) or people at risk (due to the inapplicability of what has been learned in the long term).

- *Input indicators (planned resources)*

Planned resources are input indictors of resources, according to the preliminary theory of change. They help to assess the contribution of the system to social change: funding, human capital, infrastructural security, stakeholders and partnerships. Input indicators are key to assessing relevance, effectiveness and impact. They must be specific and measurable values.

- *Process indicators (implemented policies)*

Process indicators serve to determine which of the planned policies have actually been implemented, whether the preliminary design has been followed, or changes have been made in the course of implementation. They evaluate the implementation of the set measures and activities. Process indicators are key to assessing effectiveness, efficiency and impact. They must be specific and measurable values.

- *Output indicators (result indicators)*

Output indicators serve to assess which policies are successful, and to what extent, which policies have not achieved the desired impact in terms of changing the social environment (not the activities themselves!), and what the conclusions from this are. Output indicators are key to assessing effectiveness, impact and sustainability. They must be specific and measurable values.

5.2 LACK OF A DATA CONTROL MECHANISM

A huge deficiency of the current monitoring system is the lack of a data quality control mechanism. Inconsistencies and contradictions are observed in the data that are published in the administrative monitoring reports and that are submitted to the electronic monitoring and control system. The administrative reports do not always adhere to the signatures on the measures and there is no connection with the signatures in the electronic system at all. This makes monitoring, control and evaluation of implementation extremely difficult.

- *Stakeholders*

Stakeholders should be all public institutions: ministries, agencies, commissions, inspectorates, depart-

ments, directorates and departments of public administration. This is an extremely important understanding regarding the principle of non-discrimination and the fight against hate speech.

Through this prism, stakeholders in the strategy should be various academic institutions, civil society organisations, trade unions, the media, and various types of commercial companies.

The principle of "this doesn't affect our department/company" is a fundamental expression of hidden discrimination.

▪ *Hierarchy and subordination*

The monitoring system requires the establishment of an explicit inter-institutional mechanism of subordination and accountability. According to the logic of the administrative system of the public administration in Bulgaria, a hierarchical scheme should be established according to the following or similar model:

- Secretariat of NCEEII;

- "monitoring" directorates/departments in ministries;

- "monitoring" directorates/departments in regional administrations;

- "monitoring" directorates/departments at municipal councils and the specialised state institutions (Regional Health Inspectorate, Regional Management of Education Labour Office Directorates, etc.).

The data should be submitted from the bottom up and be verified by the intermediate bodies.

▪ *Indicator system*

The indicator system requires a complete change in a great many of the indicators, in accordance with the new action plan for 2030. The signatures of the indicators in the electronic monitoring system must be related to the signatures of the measures in the action plan. Otherwise, technical errors and inconsistencies can be expected. At present, the signatures in the electronic system have been developed rather on a theoretical principle and do not correspond to the measures in the action plan. Nor are the signatures of the measures in the action plan well constructed and numerous cases of repetition of numbering due to "zeroing" in the different priorities are observed.

It is a mandatory requirement to have a complete set of input, process and output indicators for each mea-

sure. The indicators should be specific and measurable in each case.

▪ *Data entry matrix*

A single data collection matrix needs to be developed that allows for systematic and comparable information on all measures and activities in each of the monitoring years. The reliability of the data in the matrix should be ensured by short accompanying reports that comment on the data. For each activity and measure there must be clarity of the planned and expended human resources, time, financial resources, scope of activities (number of people from target groups; square metres of infrastructure, etc.), as well as the settlements, municipalities and districts covered for each of the years monitored (including when no activities have been carried out in a certain year).

▪ *Visualisation*

At the moment, the electronic visualisation of the monitoring system contains very outdated data at the national level. The system requires processing to make access to data and information transparent and user-friendly.

5.3 ONGOING MONITORING AND EVALUATION

In order to ensure comparability of data and consistency in reporting, uniform reporting forms and uniform matrices for inputting the data into the system should be prepared by specific deadlines, for example:

- ▪ municipal administrative reports - February 15th;

- ▪ district administrative reports - February 28th;

- ▪ national administrative report - March 31st;

- ▪ annual monitoring report by an independent organisation - April 30th;

- ▪ final report for monitoring and evaluation of implementation of the strategy by an independent academic organisation or research institute / sociological agency - October 1st, 2029

5.4 CONCLUSION AND RECOMMENDATIONS

The works of analysis of the administrative monitoring reports and the monitoring system made by the Institute for the Study of Societies and Knowledge – Bulgarian Academy of Sciences in 2019 and

by the Institute of Philosophy and Sociology – Bulgarian Academy of Sciences in 2020 show the lack of administrative capacity at all levels in the public administration when it comes to monitoring, evaluation and control. For this reason, the efforts of some public institutions remain unnoticed or undervalued, while other institutions neglect their obligations regarding measures for integration. For these weaknesses to be overcome, the following good practices, known from international experience can be recommended:

▪ The development and normative approval of a unified national methodology for monitoring, evaluation and quality control of the integration policies, which should contain clearly and unambiguously defined terminology and requirements regarding data collection.

▪ The development and normative approval of a national mechanism for data collection in connection with the unified methodology, which should contain a clear system of subordination, obligations and responsibilities of the experts from each of the levels.

▪ Practical training of the municipal, regional and national experts for work with databases and standardised forms, which will be developed within the framework of the unified methodology.

▪ Improving the visualisation of the indicators monitored in order to improve the publicity and transparency of the activities and the stakeholders involved.

6

ROMA WOMEN, CHILDREN AND YOU – NOT JUST A HORIZONTAL TOPIC

The problems of Roma women, children and youths need to be included not only as a horizontal policy, but to be addressed specifically. This means, on the one hand, that the priorities in the field of social inclusion (education, health, housing and employment) should be enriched with specific goals and measures that are sensitive to women, children and youths. On the other hand, it is necessary to introduce a new priority, explicitly aimed at empowering women, children and youths. The two approaches are not only not mutually exclusive, but indeed they complement each other and are equally necessary in overcoming the multiple discrimination faced by Roma women, children and youths.

6.1 OBJECTIVES AND MEASURES TARGETING ROMA WOMEN

The long-term contribution of the new National Strategy for Equality, Inclusion and Roma Participation with regard to Roma Women must go beyond the immediate trivial everyday problems related to the main areas of education, health, employment and housing, so as to address the overcoming of stereotypes and prejudices not only in attitudes towards but also in policies related to Roma women. This contribution must lead to overcoming these barriers and empowering women.

Reaching this long-term contribution should be achieved both through the priorities in the field of social inclusion and through a specific new priority "Empowerment and equal opportunities of Roma women, children and youth".

Operational objectives:

• *In the priority regarding the field of social inclusion:* overcoming the exclusion of Roma women in the main areas of education, health, employment and housing, and

• *In the priority regarding "Empowerment and equal opportunities of Roma women, children and youth":* promoting the empowerment of Roma women to become an active factor in social, political and public life.

Common goals

1. *In the priority regarding the sphere of social inclusion:* raising the socio-economic status of Roma women in order to at least halve the gap in status between them and of majority women, especially with regard to:

   a) education: reducing dropping out of school for Roma girls; increasing the participation of Roma girls in all levels of education;

   b) employment: increasing the percentage of Roma women in paid employment and self-employment;

   c) health care: increasing the percentage of Roma women with health insurance; increasing the life expectancy of Roma women to the average life expectancy of the majority of women; reducing cases of early pregnancy and childbirth; providing the necessary care and medical services for pregnant women.

2. *In the priority regarding "Empowerment and equal opportunities of Roma women, children and youths"*:

   2.1 Encouraging and supporting the participation of Roma women in all forms of public and political life, including public administration.

   2.2 Overcoming domestic violence, early marriages and other forms of traditional patriarchal prac-

tices of control and violence. Ensuring conditions for greater access to justice for Roma women. [30]

Measures:

In the priorities regarding the sphere of social inclusion:

- the establishing of "Career Start" programmes in public administration to encourage the participation of Roma women.

- the introduction of legislative changes for a more inclusive health insurance system, such as determining the status of "health insured" for pregnant women and the introduction of a mandatory number of specialised examinations during pregnancy.

- the establishment of free health packages for pregnant women.

- community campaigns to raise awareness of health rights and obligations.

- the eradication of discriminatory practices in the healthcare system.

- the qualification of medical staff on culturally sensitive topics that take into account the needs of Roma girls and women with regard to healthcare.

- increasing the number of Roma healthcare mediators, including Roma women.

- programmes to support Roma professionals in healthcare (preparatory courses for applying to medical universities, support, scholarships, mentoring and recruitment).

In the priority regarding "Empowerment and equal opportunities of Roma women, children and youths":

- the implementation of effective measures against human rights violations and discrimination against Roma women and girls, including inter-sectoral forms of violence and discrimination (domestic violence, trafficking in human beings

based on gender-based violence), racially motivated crimes, segregation in education, ethnically separated maternity wards, etc.

- Undertaking action to address the problem of early marriages without the usual stereotypes of both the Roma community and the majority; addressing the problem in terms of developing the potential of girls who are victims of early marriages.

- Developing a fund to support girls who are victims of early marriages in continuing their education.

- Organising awareness-raising campaigns among institutions and non-governmental organisations working to protect women's rights regarding violence against Roma women (especially domestic violence); inclusion of specific targeted measures to deal with cases of violence against Roma women.

- Reviewing the eligibility criteria for access to legal aid and how these criteria are applied in practice to Roma women.

- Providing information on the legal aid system and how Roma women can access it more easily, including with the support of mediators. Establishing informal legal mechanisms. Establishing a mechanism for informing Roma women within the community about the forms of domestic violence and the mechanisms for counteraction; setting up informal support groups within the community to empower Roma women and help them change attitudes themselves from within.

- Incorporating human rights education (and protection against discrimination on the grounds of sex and race) into schools and universities as part of the curriculum. Bar associations should include in their curricula for continuing professional development topics such as: protection against ethnic and gender discrimination; gender equality and gender-based violence; and hate crimes.

- Raising awareness of legal professionals, the judiciary and law enforcement officials, as well as all other professionals working with Roma women, on issues of anti-Gypsyism, hate crimes, hate speech, stereotypes and the situation of Roma women in relation to the numerous and interrelated forms of discrimination.

- Collection and publication of data, separated by sex and ethnicity, on the situation of Roma men

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30 A very good practice in this direction is the multi-annual programme of the Council of Europe Justrom, which in Bulgaria was implemented in the period 2017 - 2021 in Veliko Tarnovo and Plovdiv. More information about the programme can be found in Roma Civil Monitor. This is a civil monitoring report on the Implementation of the National Strategy for Roma Integration in Bulgaria: It focuses on the structural and horizontal preconditions for the successful implementation of the national strategies for Roma integration. 2018. Downloaded from: https://cps.ceu.edu/roma-civil-monitor-reports and in Roma Civil Monitor. A civil monitoring report on the implementation of the National Strategy for Roma Integration in Bulgaria: Identifying the Shortcomings in the Roma Inclusion Policy. 2020, pp., 31 - 32. Downloaded from: https://amalipe.bg/wp-content/uploads/2020/12/RCM-Y3C1-Bulgaria-local-PUBLISHED.pdf :

and women, while ensuring compliance with personal data protection requirements.

- Ratification of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence.

- Organising a campaign and attracting popular public figures as ambassadors of the campaign in order to change public attitudes and overcome stereotypes and prejudices towards Roma women, early marriages and other negative practices that stigmatise Roma women.

- Promoting the inclusion of Roma women in working groups, advisory councils and other structures for the participation of civil society in the monitoring processes of the National Strategy, the programmes financed by the European Social Fund, the European Regional Development Fund, the European Economic Area and others.

- The establishment of leadership programmes and programmes for development of the capacity of Roma women for civic participation.

6.2 OBJECTIVES AND MEASURES TARGETING ROMA CHILDREN AND YOUTHS

Operative objectives:

In the priorities regarding the field of social inclusion: reduction of child poverty in the Roma community and reduction by at least half of the difference in child poverty between Roma and the majority.

In the priority regarding "Empowerment and equal opportunities of Roma women, children and youths": ensuring the protection of all rights of Roma children and eliminating all forms of anti-Roma discrimination / anti-Gypsyism.

Common goals:

In the priorities regarding the field of social inclusion: reduction of child poverty in the Roma community to the average level for the country through:

a) education: ensuring free pre-school education for at least three years; taking measures to overcome school segregation and provide access to quality and inclusive schools; ensuring the coverage of all children in secondary education; the introduction of multicultural education, education for tolerance and education that represents Roma culture, history and language;

b) health care: ensuring free and quality health services for all children starting from pregnancy; providing quality health services close to where they live, including in rural areas and in large urban Roma neighbourhoods; ensuring healthy eating;

c) housing conditions: introduction of mechanisms to support families without adequate housing in order to ensure good living conditions for their children; in the event of expulsion, ensuring that no child is left homeless; introduction of social housing for poor families.

1. With regard to Roma youths:

a) reducing the number of Roma NEETs (Not in Education, Employment or Training) to the national average;

b) providing access to second chance education opportunities;

c) providing access to vocational training;

d) establishing conditions for access of Roma youths to university education and lifelong learning and training;

e) establishing conditions for access of Roma youths to the labour market: by promoting "Career Start" operations and participation of Roma youths in them; public information activities among employers;

In the priority regarding "Empowerment and equal opportunities of Roma women, children and youths":

1. Ensuring full protection of children in the Roma community, including in cases of begging, early marriages, etc.:

a) prevention, support for families and the possibility of placing children in systems of child protection, if necessary;

b) ceasing the practice of placing Roma children in state care institutions, except as a last resort;

c) support for the process of deinstitutionalisation, including support for increasing the capacity of poor Roma families to provide full support for their children;

d) protection of Roma children from violence (including sexual violence), sexual exploitation of children and child pornography.

2. Elimination of forms of racism, harassment and segregation that affect Roma children of pre-

school and school age, as well as the introduction of intercultural education and education for tolerance.

3. Establishing leadership programmes for young Roma to develop their capacity and encourage their participation in public and political life.

4. Prevention of all forms of racism, discrimination and segregation affecting Roma youths, the introduction of intercultural education and education for tolerance; promotion of campaigns for tolerance towards youn g people, etc.

Measures:

In the priorities regarding the field of social inclusion:

• The introduction of intercultural education and upbringing, aiming at forming tolerance.

• Ensuring full coverage of Roma children for the mandatory 3 years of preschool education; the introduction of free kindergartens.

• Establishing scholarship programmes and financial support programmes for travel expenses for students from vulnerable groups enrolled in high schools and universities.

• The adoption of legislative or regulatory changes to overcome school segregation.

• Increasing the number of Roma educational mediators; creating a programme for the qualification of educational mediators.

• The implementation of municipal and national de-segregation programmes, supported by appropriate financial mechanisms.

• The qualification of the pedagogical staff for work in a multicultural environment, including on culturally sensitive topics that take into account the needs and problems of Roma girls, especially in education.

In the priority regarding "Empowerment and equal opportunities of Roma women, children and youths":

• Establishing youth clubs for tolerance.
• Conducting campaigns aimed at developing tolerance of diversity.

7

SUGGESTIONS REGARDING FUNDAMENTAL PRIORITIES

7.1 EDUCATION

Long-term goal: Equality of access to quality education and raising the educational level of Roma and other citizens living in a similar situation.

Confirmation of intercultural education as one of the horizontal principles of the Bulgarian educational system. Preservation of the ethnic identity of all children and the formation of tolerance to different people and differences in general.

Short-term goals:

- Access to quality early childhood care and preschool education as a condition for positive early childhood development and subsequent educational integration.

- Improving the quality of education with a focus on labour integration (market needs) and the interests of the child (taking into account the individual psychological characteristics and social environment).

- Forming tolerance and preservation of the ethnic identity of Roma children through the means of the educational system.

- Support for further and secondary education, as well as for post-secondary colleges - especially for professions with a high demand in the labour market.

- Combating segregation. Prevention of secondary segregation:

  o in kindergartens and preschool groups;

  o in comprehensive schools;

  o in vocational high schools.

Measures:

- Targeted measures at national and local level to overcome segregation and educational discrimination.

- Increasing the scope of the educational system and the prevention of dropping out:

  - by involving parents and local communities, including through the formation of parents' clubs, participation in school boards, etc.;

  - through social measures to support households below the poverty line;

  - through appointment of educational mediators and the development of their activity;

  - through logistical measures to support households in remote areas;

  - through targeted educational services for National External Evaluation and State Matriculation Exams to support students from socially vulnerable households.

- Improving reintegration mechanisms and the possibility of lifelong learning:

  - through intensive mobile educational services in the community;

  - through individual mentoring, tailored to the needs of the specific children and people involved;

  - by developing a mechanism for recognition of courses in mathematics, special and general education covered abroad, which should include an intensive course in the Bulgarian language and a review course on Bulgarian literature.

- Improving the mechanisms for acquiring, raising and recognising the qualification of persons who have dropped out early or are who do not fall in the scope of the education system:

  - through intensive mobile educational services (educational caravans or thematic workshops);

  - through formal and informal educational services with applied / practical orientation (e.g. landscaping, agriculture, construction and repair activities, etc. depending on the specifics of the municipality), combined with intensive Bulgarian language courses, including those

organised by real business firms (e.g. industrial enterprises) for their own purposes.

- The introduction/expansion of various forms of intercultural education which preserve ethnic identity and form tolerance:

    - through forms of optional classes;

    - through extracurricular activities;

    - through intercultural elements in the subjects of compulsory preparation at all stages of school education.

Activities:

The list below serves simply as an example:

- The elimination of fees for nurseries and kindergartens.

- Ensuring transport services to educational facilities (provided by the municipality or the school) for remote rural areas and access to convenient urban transport (It can be a matter of one stop or extending the route by several kilometres).

- Expanding the network of educational mediators with the goal of covering each area of concentrated poverty and linking their work with NGOs (so as to increase their powers and thus avoid the scheme of dependence on the management of specific schools or discriminatory attitudes in other schools).

- "Afternoon" (i.e. supplementary) targeted training for National External Evaluation and State Matriculation Exams for children from socially vulnerable households (at risk of poverty, in the absence of an adequate learning environment at home).

- The preparation of a standardised "secondary" path for exit from secondary education (similar to the model of Secondary Professional Technical schools before 1989), in which 12th grade students who do not manage to successfully pass the basic National External Evaluation receive a diploma for secondary education, but do not have the right to continue their studies in Higher Education (ISCED-5 and ISCED-6), and only in a professional college (ISCED-4). The secondary pathway should guarantee professional colleges and future employers a sufficient level of functional literacy in the Bulgarian language (e.g. understanding the meaning of a message, instruction or manual) and applied mathematics (e.g. financial arithmetic, time management programmes / schedules and timetables). /, geometric drawings, relative proportions).

- Desegregation activities at the municipal level with the application of a model of proportional quotas in each school, in order to stop the processes of secondary segregation (the example of the municipality of Gabrovo can be taken as a positive model).

- State support for the preparation and issuing of textbooks on Roma culture and history, as well as on the Roma language.

- Introducing a requirement for a certain percentage of extracurricular activities financed from the state budget and European projects to be in the field of intercultural education.

- Continuing the practice of providing funds for schools and kindergartens with a concentration of vulnerable groups under Art. 52a of the Financing Ordinance. Linking this practice with improving the quality of education and the process of desegregation.

- Legislative changes which limit education in segregated schools in Roma neighbourhoods to the initial stage. Preventing urban neighbourhood schools from being transformed into a unified school.

- Purposeful activities of the regional departments of education for application of the requirements of Art. 99, para. 4 of the Law on Preschool and School Education, which does not allow the formation of segregated classes in ethnically mixed schools.

- Mandatory requirements for all municipalities in which urban schools operate, which receive funds under Art. 52a of the Financing Ordinance to approve and implement a plan for desegregation.

7.2 HEALTH

Operational objective: Ensuring equality in access to quality health services and prevention programmes.

Implementational objectives:

1. Reducing child mortality.

2. Improving access to health services for disadvantaged persons belonging to ethnic minorities.

3. Improving health care for newborn babies and preschool children.

4. Improving prophylactic activities among the Roma population.

5. Raising the health knowledge and awareness of the Roma population.

Main activities to achieve the goals:

- Community assistance in the efforts of the family GP to cover pregnant women up to the fourth month of pregnancy with registration, consultation with a doctor, obstetrician and gynaecologist, and timely admission to a maternity hospital.

- Performing obstetric and gynecological examinations with mobile offices in settlements with a

compact Roma population. The provision of contraceptives to willing persons belonging to the group of low-income persons.

- Conducting antenatal diagnosis of pregnant women at risk.

- Conducting conversations with adolescents and young people and their parents about ways to prevent unwanted and early pregnancy, about the dangers of early pregnancy for the mother and the baby; about the risk of giving birth to children with congenital anomalies and hereditary diseases and ways of prevention.

- Seeking out children without a GP and explaining to their parents the importance of registering them.

- Conducting health talks and conversations with young mothers on the importance of immunisation and their motivation for their regular use, according to the National Immunisation Calendar.

- Carrying out immunisation with mobile teams in settlements without family doctors.

- Active search by the GP for newborn babies at home and their immunisation with vaccines appropriate for their age.

- Conducting health talks and disseminating informational materials.

- Conducting awareness campaigns on the need to vaccinate the population with mandatory immunisation according to the National Immunisation Calendar.

- Conducting early diagnosis and screening tests with mobile mammograms for the prevention of breast cancer.

- Conducting early diagnosis and screening for pulmonary arterial hypertension, cardiovascular disease, lung disease, diabetes and dyslipidemia (dyslipidemia is any condition in which the fat metabolism of the body is impaired) with mobile fluorographs, ultrasound tests and laboratories.

- Conducting awareness campaigns on the importance of preventive examinations among the Roma population.

- Capacity building and community work for HIV prevention and control through counselling and guidance services for anonymous and free testing for HIV and sexually transmitted diseases.

- Activities to improve control of tuberculosis among the Roma community by conducting risk screening, monitoring and testing for tuberculosis; support in the process of treatment of patients with tuberculosis; support for the operation of outpatient

clinics for primary health care in neighbourhoods populated mainly by Roma, co-financed by municipalities and with mobile equipment.

- Organising and conducting campaigns to learn about ways to prevent the most common infectious, oncological, cardiovascular and hereditary diseases.

- Periodic interviews with health professionals about the harm of the most common risk factors: smoking, alcohol abuse and unhealthy eating, and the benefits of a healthy lifestyle; the development and implementation of programmes for prevention of human trafficking and sexual violence among people from the Roma community.

- The issuing and distribution of brochures and leaflets by health organisations.

- The introduction of interactive sessions on health and sexual education in schools with a predominantly Roma population as part of the compulsory curriculum.

- Stimulating the establishing of extracurricular forms of health education for Roma children - clubs, sports sections, etc.; informing people from the Roma community about their health insurance rights and obligations, as well as about their rights as patients.

7.3 LIVING CONDITIONS

Operational objective: improvement of housing conditions, including the surrounding technical infrastructure.

Objectives for implementation:

1. Improving the living conditions in neighbourhoods with a compact Roma community and other people living in similar conditions.

   Legal access to electricity, quality water and sewerage in isolated neighbourhoods with a concentration of poverty.

2. Allocation of new territories for housing construction with opportunities for deconcentration of the compact and detached Roma neighbourhoods. Improvement of the public environment and construction of a social and technical infrastructure.

3. Projecting and constructing a technical infrastructure in existing neighbourhoods with a concentration of poverty.

4. Construction and rehabilitation of social housing. The introduction of alternative models of social housing for households in areas of poverty.

5. The provision of alternative housing in case of forced removal of vulnerable families from the homes in which they live.

Establishing an integrated national mechanism for improvement and support for socially disadvantaged households in acquiring housing and its responsible management.

Main activities for achieving the goals:

- Improving the condition of the infrastructure of the Roma neighbourhoods with regard to the engineering infrastructure.

- Improving neighbourhoods with a concentration of poverty as a mechanism for transforming attitudes towards a change in life.

- Support for individual legal practices in the acquisition and management of housing.

- The development and implementation of municipal programmes for improvement of housing conditions in neighbourhoods with compact Roma population and other people living in similar conditions.

- The identification of suitable terrains.

- Conducting an information campaign with the remaining population living next to the land provided to avoid the negative consequences of accommodating Roma in tthat location.

- Settlement of land ownership issues.

- The allocation and provision of land for housing construction.

- The development of cadastral maps and cadastral registers of territories, including areas with a compact Roma population and other people living in similar conditions.

- The production of specialised maps.

- The photographing and creating of regulatory plans.

- Determining the administrative address of the properties.

- Making the projects of the technical infrastructure:

  - water supply;

  - sewerage;

  - street network;

  - landscaping;

  - gas supply network.

- The construction of sites from the technical infrastructure.

- The construction of new social housing.

- The renovation of existing social housing

- Reconstruction of sites of educational infrastructure.

- Reconstruction of sites of cultural infrastructure.

- Reconstruction of sites of social infrastructure.

Contribution of the operational programmes to the implementation of the action

- The preparation of cadastral maps and registers of territories with a compact Roma population.

- Providing funding for the construction of municipal and social housing to accommodate vulnerable groups.

- The construction and development of infrastructure for the provision of health and social services in the community.

- The construction of new or renovation of existing infrastructure in the field of education, culture and sports in the community.

7.4 EMPLOYMENT AND SOCIAL INCLUSION

EMPLOYMENT

Operational objective: promoting employment and development of skills

Objectives for implementation:

1. Increasing employment for people aged 15-64

2. The inclusion in employment of disadvantaged groups on the labour market (long-term unemployed, unemployed with primary and lower education, unemployed over 50 years of age, unemployed with disabilities, youth, etc.).

3. Reducing the number of economically inactive people

Main activities for achieving the goals:

1. Active labour market policies and measures with an accent on individualised and integrated support.

2. Targeted support for advanced training and re-training, internships, apprenticeships.

3. Active employment mediation for ensuring employment, development of skills for choosing a profession, job search, presentation to an employer, support from a psychologist if necessary, as well as the preparation of an individual profile of the unemployed person and the preparation of an individual plan based on it, with measures for the specific person and appointment of a case manager, with whose help and supervision the long-term unemployed person could follow the steps of their personal plan.

4. Activities for integrated services, focused on the problems and needs of the individual.

5. Measures to activate inactive and discouraged people.

6. Activities aimed at the development of digital skills, incl. using online services.

Operational goal: the development of entrepreneurship

Objectives for implementation:

1. Creating sustainable jobs for disadvantaged groups on the labour market.

2. Providing opportunities for the development of self-employment and social enterprises, as well as entrepreneurial skills.

Main activities for achieving the goals:

1. Development of measures and activities that support labour mobility, including daily labour mobility, labour mobility within the country (moving from one settlement to another in order to start a new job), labour mobility from abroad to the country (of Bulgarian citizens or persons from the EU and third countries).

2. Support for inclusive entrepreneurship and the promotion of business start-up initiatives by people from disadvantaged groups.

3. Strengthening the entrepreneurial culture among disadvantaged groups, creating entrepreneurial skills through training and mentoring, meeting successful start-ups and joining networks to increase the potential for sustainability, facilitating access to finance, support in the initial stage of entrepreneurial activity with specialised services and consultations, etc.

4. Self-employment.

5. Development of social entrepreneurship - as a form of hiring disadvantaged groups.

6. Training of employers on the problems of disadvantaged groups.

SOCIAL INCLUSION

Operational objective: the promotion of social inclusion, improvement of the quality of life, integrated measures and approaches aimed at the elderly and people with disabilities, as well as those with special needs and other vulnerable groups, including children, and additionally aiming for active inclusion and equal opportunities for better employability.

Objectives for implementation

1. Support for better integration of marginalised communities in the country.

2. Improving the quality and availability of integrated social services by assessing individual needs.

Free health care, free education, child care, adequate housing and adequate nutrition for children at risk of poverty.

Main activities for achieving the goals

1. The development of measures and activities for active inclusion, in order to improve the employability and social inclusion of vulnerable groups through integrated support.

2. Activities for improving the access of vulnerable groups, including the Roma, to specialised and publicly available support services for active inclusion.

3. Measures and activities aimed at early child development and early intervention, prevention and reintegration, improving the quality and effectiveness of social services to support children and their families, as well as the integrated provision of support and integrated cross-sectoral services.

Contribution of the operational programmes to the implementation of the action

The proposed measures, objectives and activities are in line with the Operational Programme "Human Resources Development".

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