



MONITORING THE

IMPLEMENTATION OF THE NATIONAL ROMA INTEGRATION STRATEGY

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INTRODUCTION

A decade is too short a period to achieve a major change in a complex social process such as equal Roma integration. At the same time a decade is quite enough to check and analyse the relevance, efficiency, and effectiveness of a strategic document such as the National Roma Integration Strategy of the Republic of Bulgaria. The end of 2020 was the formal end of the period set out in the said strategic document as well as an occasion to focus on its continuation in connection with the necessary changes.

This analysis aims to contribute to the assessment of the final National Roma Integration Strategy and its

implementation in terms of the necessary changes in the new document on Roma equality, inclusion, and participation. The analysis complements and does not replace the existing reports evaluating the National Strategy, i.e., the Civil Monitoring Reports on the Implementation of the National Roma Integration Strategy in Bulgaria prepared by a broad coalition of leading Roma NGOs, and the Evaluation of Roma Integration Policies 2012–2019 developed by the Institute of Philosophy and Sociology at the Bulgarian Academy of Sciences.

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ROMA IN BULGARIA

Bulgaria is one of the countries with the largest Roma population according to the broad definition adopted by the European Commission¹. The exact number of Roma is difficult to determine and varies precisely because of the heterogeneous nature of the population. In this regard, the tools used in Bulgaria for conducting a census of the country's population are not well-adapted to the specifics of this population and many respondents prefer to identify themselves as Turks, Bulgarians, Vlachs, and others or not declare their ethnicity (especially in cases of mixed marriages and de facto multiple ethnicity). During the 2001 census 370,908 people identified themselves as Roma and in the 2011 census their number was 325,343, representing approximately 4.9% of the country's population². However, some international and Bulgarian researchers estimated the number of Roma in Bulgaria at around 800,000 in the early 1990s. Although this estimate is a matter of academic debate because it was based on unofficial police estimates of the "Gypsy population" before 1989, the European Union's Framework for National Roma Integration Strategies has a similar number of Roma in the country, having in mind that the discriminatory attitude of the macrosociety towards the residents of segregated residential areas is similar, regardless of the self-determination of the people in them³. If we accept such an estimate as true, it will mean that Bulgaria is the country with the highest share of Roma population in Europe.

The factual difference between the number and the relative share of the communities defined by the surrounding population as Gypsies / Roma and the formal number of people identifying themselves as Roma during the census is a phenomenon that occurs in other European countries, too. The reasons for this

vary, but in Bulgaria at least three relatively significant factors can be identified:

1. Approximately 10% of the Bulgarian citizens refused to self-identify ethnically during the last census in 2011. This was a relatively large share of the population (in practice twice as high as the share of self-identified Roma). The fact requires that the data on the ethnic structure of the Bulgarian population be carefully considered, as the representatives of some ethnic minorities and families resulting from ethnically mixed marriages may have remained outside the census. The statistical analyses made after the census clearly showed that the people who did not self-identify did not only/mainly come from the Roma communities, but there were undoubtedly districts where the Roma (especially those who did not speak Romani) had the largest share in the population.

2. Many Roma living in Bulgaria belong to specific subgroups that do not speak Romani but use Bulgarian, Turkish or Romanian as their mother tongue. Traditionally, these communities have a preferred non-Roma self-consciousness, and during the census identify themselves as Turks, Bulgarians, Vlachs, and others. According to expert estimates, the number of Turkish-speaking Roma identifying themselves as *millet* is about 200–300 thousand people, and in some cities they live in numerous segregated neighbourhoods. For example, in Stolipinovo, Sheker Mahala and Arman Mahala in Plovdiv over 90% of the residents belong to the millet group and identify themselves as Turks in the census. Tens of thousands of people belong to the Rudari group, i.e., the Romanian-speaking Roma, and according to some estimates about 150,000 Roma speak Bulgarian as their mother tongue and identify themselves as Bulgarians in the census.

3. The third important factor is the fact that some educated Roma and Roma with higher social status prefer to hide their ethnic identity and refuse to publicly declare themselves as Roma. The reason is that in some parts of the country there is institutional discrimination and deep public prejudice, which would negatively affect both their careers and the educational integration of their children.

1 The definition covers the following communities: Roma (i.e., Romanes speakers), Sinti, Kale, Romanicheli, Boyash (or Rudari) Ashkali, Gyuptsi, Yenish, Dom, Lom, Roma, and Abadal, as well as nomadic populations (Chergari, Gypsy, Kamminanti, etc.). In view of the Bulgarian context, the aggregate of communities with different ethnonyms includes Roma, Millet, Rudari / Ludari, Gyuptsi, Tsutsumani, Sarhatsi, Karastanchovtsi, Dale, Demirdzhii, Dzhorevtsi, etc.

2 <https://www.nsi.bg/census2011/pagebg2.php?p2=175&sp2=190>

3 <https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX%3A52011DC0173>

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ROMA INTEGRATION POLICIES BEFORE THE NRIS⁴

The attempts to formulate a comprehensive national Roma integration policy and establish a normative, institutional and financial framework for the implementation of such a policy began in the mid-1990s. The Euro-Atlantic perspective, i.e., Bulgaria's application for NATO and EU membership, accelerated the process and several political documents for Roma integration (strategies, programs, and plans) were adopted and measures were taken to increase the administrative capacity to implement the documents. This stage began in 1999 when the first Framework Program for Equal Integration of Roma into Bulgarian Society was adopted and ended with the Bulgaria's accession to the European Union. The main driving factors were both internal (pressure from the civil society – primarily human rights organizations, Roma, and pro-Roma organizations) and external (related to the requirements set for Bulgaria in the negotiation process). As a result, on the eve of the official accession to the EU, Bulgaria had some of the necessary prerequisites for the formulation and implementation of a comprehensive policy for Roma integration, such as:

- **Adopted Roma integration documents:** comprehensive policy documents (Framework Program for Equal Integration of Roma into Bulgarian Society and Action Plan for the Decade of Roma Inclusion) as well as sectoral strategies for educational, health, and housing integration. For the most part, these documents were adopted by consensus, after discussions with the civil society and interested institutions, and Roma NGOs were actively involved in their development⁵. The problem in this case is the lack of real implementation. *"It is widely believed among many Roma activists that the regulatory framework is relatively good, but its implementation is facing problems⁶".*
- **Public institutions with a mandate to coordinate activities for Roma integration:** The executive institutions have the authority to consult the formulation and implementation of integration policies with the civil sector and ethnic minority organizations (the National Council for Cooperation on Ethnic and Demographic Issues and the Ethnic and Demographic Issues Directorate at the Administration of the Council of Ministers). Although these institutions have relatively limited powers and are a source of public tension, they are a step forward in building an institutional framework for Roma integration.
- **Legislation and institutions in the field of anti-discrimination:** The Protection Against Discrimination Act meets the highest European standards, including the protection against discrimination on ethnic grounds. The established Commission for Protection Against Discrimination is an institution with a serious mandate, elected by the National Assembly, and having its own regional representatives, etc. In the first years of its work the commission considered and resolved numerous cases of ethnic discrimination.

⁴ The full name of the document is *National Roma Integration Strategy of the Republic of Bulgaria*.

⁵ For example, the Framework Program for Equal Integration of Roma into Bulgarian Society was signed by 56 Roma organizations, parties, and activists: a review of signatories shows that all active Roma members of the public in 1998-99 were among them. See: http://www.ncedi.government.bg/7_RPRIRBO-sporasumenie.htm

⁶ Kolev, D. et al. Annual Report on the Implementation of the Policies Aimed at Roma Integration in Bulgaria – 2006, p. 34. Veliko Tarnovo, 2007. Available at: http://www.amalipe.com/files/publications/080108_Doklad-bg.pdf

3

NATIONAL ROMA INTEGRATION STRATEGY OF THE REPUBLIC OF BULGARIA

On 5 April 2011 the European Commission announced An EU Framework for National Roma Integration Strategies⁷. After consultations with non-governmental organizations, which took place in the second half of 2011, the Council of Ministers adopted the National Roma Integration Strategy of the Republic of Bulgaria (NRIS) and Action Plan (AP) on 21 December 2011. Following the request of the Roma non-governmental organizations, the strategy was proposed to the Parliament and approved by a Decision of the National Assembly of 1 March 2012⁸. Thus, the NRIS became the first document on Roma integration in Bulgaria approved by the National Assembly, which was an important achievement (all previous documents were approved by decisions of the Council of Ministers, the relevant Minister or, in the best case, by a Decree of the Council of Ministers). Thus, the strategy could oblige and engage a wider range of institutions in its implementation, such as municipalities, etc.

The strategy contained a rich statistical analysis of the current situation by sectors, vision, principles, goal, and priority objectives in 6 sectoral areas, implementation mechanisms and monitoring. The strategic goal of the NRIS was defined as “Creating conditions for equal integration of Roma and Bulgarian citizens in vulnerable positions from other ethnic groups into public and economic life by ensuring equal opportunities and equal access to rights, goods, products and services, participation in all spheres of society, and improving the quality of life, while respecting the principles of equality and non-discrimination⁹.” The six priority areas under the NRIS were education, employment, healthcare, housing, rule of law and non-discrimination, and culture and media. In addition to the strategic part, the new document was accompanied by an Action Plan, which outlined the measures, responsible institutions, and funding.

The process of drafting the NRIS was inclusive and Roma organizations participated on an equal footing with the relevant institutions. For example, the Order of the Prime Minister on the formation of an Interdepartmental Working Group to prepare the proposal for a new document (P-185 / 22.07.2011) included 22 representatives of non-governmental organizations (out of a total of 53 participants in the group). Roma NGOs organized four national conferences on the strategy’s various priorities (in Sliven, Stara Zagora, Vratsa, and Lom¹⁰), and dozens of organizations from across the country took part in the final discussion in Sofia on 14 November¹¹.

The overall assessment by Roma NGOs and independent experts involved in the development of the NRIS was summarized in an opinion published in a civil report on the implementation of the Strategy in the period 2012–2014: “It (NRIS) is a step forward: the Strategy demonstrates the political will to bring the integration policy higher on the agenda of the Bulgarian government and sets out an appropriate strategic approach and guidelines for action. In this context, the NRIS continues and develops the strengths of the previous documents for Roma integration adopted by three Bulgarian governments. At the same time the Strategy does not propose a change in the institutional infrastructure of Roma integration policies or in the monitoring and evaluation mechanisms that have proven ineffective in previous years. Important chances have been missed in this direction and must be compensated. The added value of the Action Plan is minimal due to the lack of financial resources for most of the activities and the lack of new activities other than those currently underway. The plan is inconsistent: some of its parts are relatively detailed in terms of activities, unlike others which are modest and formal. The PD seems to be an explanatory rather than

7 <https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX%3A52011DC0173>

8 See more information at: <http://www.amalipe.com/index.php?nav=news&id=1101&lang=2>

9 National Roma Integration Strategy of the Republic of Bulgaria, p.9. Available at: <http://ncedi.government.bg/page.php?category=35&id=1741>

10 The events were organized by Amalipe Centre, Roma Academy of Culture and Education, Sliven; World Without Borders Association, Stara Zagora; New Road Association, Hayredin; and Roma Foundation, Lom.

11 Organized by the National Council for Cooperation on Ethnic and Integration Issues

a planning document: it describes what is currently being done rather than planning new activities¹².”

The national strategy can be analysed through the prism of several important characteristics:

- **Realistic national goals and priorities**

The Strategy Paper implemented an approach that followed principle 2 - Explicit but not exclusive focus - of the ten basic principles for Roma inclusion approved by the Council of the European Union. It set national goals in the six priority areas of public policies, which were a continuation of the main priorities of the existing documents on Roma integration and were recognized by the stakeholders working for Roma integration. An exception was the Employment priority area, in which the proposal of Roma and non-Roma organizations (such as UNICEF, the National Network for Children, and others) to expand the scope of public policies and reformulate the priority as Employment and Social Inclusion remained unaccepted.

- **Reaffirming the old institutional implementation framework**

Part VII of the NRIS - Integration Policy Implementation Mechanisms - confirmed the existing institutional framework and division of responsibilities. The executive institutions retained the role of managing the integration policy in specific areas (for example, the Ministry of Education was responsible for educational integration, etc.), and the coordinating role of the National Council for Cooperation on Ethnic and Integration Issues was also strengthened. The strategy called for “building and maintaining the necessary administrative capacity in key responsible institutions”, which was an obvious need given the lack of any administrative infrastructure dealing with Roma integration in key ministries. As of 2011 and currently, no ministry has had an administrative unit¹³ dealing with Roma integration, and the task has been assigned to one expert, among several other responsibilities¹⁴. As a partial exception, we can mention the Centre for Educational Integration of Children and Students from Ethnic Minorities. It is an independent structure whose task is to raise and allocate funds between schools and kindergartens for the implementation of educational integration policies without having the functions to define the policies.

The lack of a specialized administrative unit responsible for integration policies is undoubtedly an ineffective approach. However, the strategy did not require a change in the current situation; on the contrary, it even left the option to continue the same model of work. In particular, the Strategy envisaged too much variety of administrative infrastructure related to Roma integration, namely “delegation of certain responsibilities to directorates, branches, units or experts, or formation of specialized units”. This summarized all possible cases and essentially did not offer anything, nor did it provide for a minimum standard.

The same part of the NRIS envisaged “involvement of municipalities in the implementation of the integration policy”, which was an important requirement in a positive direction given that until 2011 the municipal authorities would stay away from the policy of Roma integration, the latter considered to be the responsibility of the central government. However, the Strategy did not provide for the mandatory requirement for special administrative support at the municipal level, stating that the formation of the necessary administrative capacity in the structures of municipal administrations could be done “by delegating certain functions to directorates, branches, units, and specialists responsible for the integration policy”. There was also no clear requirement to appoint experts/specialists on ethnic issues: this was recommended in case of identified need. I.e., here, too, the Strategy offered nothing different from what had existed so far.

The NRIS strengthened the institutional infrastructure for Roma integration at the central and municipal levels without developing it in one of two possible directions: creation of a body / institution with management functions (not only coordinating ones) or formation of administrative units dealing mainly with the integration of Roma in key institutions. The lack of appropriate administrative support determines three possible options for the implementation of the NRIS: formal implementation or even no implementation; strengthening the role of municipalities, non-governmental organizations, and other stakeholders in initiating and implementing Roma integration activities; changes in the administrative infrastructure not foreseen in the Strategy.

- **Poor monitoring**

The Implementation Monitoring chapter was extremely short and in fact equated the concept of monitoring and evaluation with the so-called “administrative monitoring”, which was a record of the activities carried out rather than an actual evaluation and control procedure with a view to more efficient and sustainable implementation. Although NGOs and experts raised several proposals to introduce additional independent monitoring and evaluation mechanisms, they

¹² Kolev, D., T. Krumova, M. Ilieva, and Sp. Petrova, Civil Assessment of the Implementation of the National Roma Integration Strategy 2012-2014, pp. 7-8. Plovdiv, 2015. Available at: <http://amalipe.com/files/publications/Grajdanska%20ocenska.pdf>

¹³ Such units at a lower administrative level – departments – existed in the Ministry of Education and the Ministry of Labour and Social Policy. They were disbanded in March 2009 and April 2011, respectively.

¹⁴ This is currently the case with the Ministry of Education, the Ministry of Culture, the Ministry of Labour and Social Policy, the Ministry of Regional Development, the Ministry of Health, and the Employment Agency.

were not included in the final version. The impact assessment indicators included in the PD, in many cases, did not actually measure the impact, but represented a summary report of the activity, which essentially had no indicative value to the target groups of the activity.

An indirect assessment of the serious weaknesses in the envisaged monitoring mechanism was also given by the European Commission, which subsequently proposed the establishment of a special system for monitoring the implementation of the National Roma Integration Strategy with funds from the Human Resources Development Operational Program. This was set as a precondition for the implementation of the new programs co-financed by the European Social Fund. However, the lack of administrative capacity in public institutions was also reflected in this aspect, as the reports of the municipalities and ministries in many cases did not follow the monitoring system protocol (since it was additionally introduced and was not a technical part of the strategy).

■ **National Assembly Decision**

The most important positive aspect of the NRIS is that it was adopted by a decision of the National Assembly. This was one of the main demands made by the Roma organizations participating in the consultation process in mid-October 2011¹⁵. The approval of the Parliament not only demonstrated a strong political will to put the integration of the Roma in a more prominent place on the agenda of the Bulgarian society, but also provided an opportunity to engage a wide range of institutions in its implementation. The decision of the National Assembly may involve the municipal authorities, the national ombudsman, and other institutions apart from the executive branch. This could open up a wide range of new opportunities for the NRIS.

In addition, the approval of the National Strategy by the National Assembly provided an opportunity for monitoring and evaluation of its implementation outside the framework of the Administrative Monitoring. It was envisaged that the Government will submit a report on the implementation of the National Strategy every year in the National Assembly and the latter will decide on the report. This was an opportunity for the implementation of the integration policy to be discussed by the legislature, with all accompanying risks.

■ **Action plan**

The existence of an Action Plan was an extremely positive fact. This was an opportunity to plan a comprehensive program of activities with funding, deadlines, and administrative responsibilities for the implementation of the NRIS. Through the action plan approved by Decision No. 1 of the Council of Ministers dd. 05.01.2012 the strategic goals set out in the Strategy could be turned into more specific tasks and very specific activities. In practice, this was rather not the case. The Plan approved in 2011 did not envisage any new activities, but only summarized what the relevant ministries were already implementing – in most cases without any connection to the integration policy. Most of the priority areas were not supported by specific funding or this was the funding approved before the development of the NRIS and without any connection to its adoption and implementation. ***In this respect, the added value of the Strategy and Action Plan was very limited.***

For most of the activities provided in the PD there was no funding provided: in the "Financing" column there was either an empty field, or "no funding required", or "from own budgets". In fact, out of the 120 activities included in the Plan, 71 did not have any targeted funding provided.

Priority area	Number of activities	With provided funding	Without provided funding
<i>Education</i>	40	13	27
<i>Healthcare</i>	39	27	12
<i>Employment</i>	8	0	8
<i>Housing</i>	18	6	12
<i>Rule of law</i>	7	3	4
<i>Culture and media</i>	8	0	8

¹⁵ See <http://www.amalipe.com/index.php?nav=news&id=935&lang=1>

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NATIONAL ROMA INTEGRATION STRATEGY IMPLEMENTATION

The implementation of the National Roma Integration Strategy of the Republic of Bulgaria is yet to be analysed from different points of view. In general, the opinion that the NRIS has not significantly changed the implementation of the integration policies is shared by most stakeholders. The Civil Monitoring Reports on the Implementation of the National Roma Integration Strategy as well as three consecutive reports from various institutes of the Bulgarian Academy of Sciences in 2018, 2019, and 2020 analysed the main aspects of the implementation of the strategic document by priority areas. For this reason, the current analysis focuses on the change / lack of change in the institutional and financial framework for the implementation of the NRIS.

4.1 INSTITUTIONAL FRAMEWORK AT NATIONAL AND LOCAL LEVEL

As mentioned above, the National Strategy reiterated the existing division of responsibilities in the implementation of the integration policies at the national level. The line ministries, such as the Ministry of Education and Science, the Ministry of Health, etc., have managerial powers and responsibility for the implementation of the relevant aspect of the integration policy. The coordination of the line ministries is carried out by the National Council for Cooperation on Ethnic and Integration Issues chaired by a Deputy Prime Minister. The Council also has an obligation to consult the civil sector on the implementation of the integration policies. In addition, the National Strategy wishes to build the necessary administrative capacity without requiring this or determining in what form it should be implemented.

The past ten years have seen stagnation and even a deterioration of the institutional framework at the national level. The stagnation is primarily related to the formation of the necessary administrative capacity in the line ministries. In none of them the capacity has increased as compared to 2011. No departments, directorates or other units have been formed with basic powers to implement the relevant policy for the integration of Roma, minorities, or vulnerable groups.

At some point there was even a danger that the situation will worsen due to the attempts to transform the Centre for Educational Integration of Children and Students from Ethnic Minorities into a structure for the support of the educational integration of a wider group, including Bulgarians abroad. The latter would lead to the loss of the specifics of work with ethnic minorities in the activities of the Centre. The danger was not realized, including due to the reaction of the Roma organizations participating in the Management Board of the Centre.

Deterioration was noted in the activities of the NCCEII, especially in its advisory functions to civil society organizations. Analysing this deterioration, we should point out that serious doubts about the council's ability to perform its coordinating and advisory functions have existed since its inception. According to the Civil Monitoring Report on the Implementation of the NRIS, "The main weaknesses of the NCCEII are:

- The structure of the NCCEII and its powers do not allow for the actual implementation of a consultative and coordination process, as the Council does not function in essence: it does not have any managerial competences for decision-making; the participation of NGOs is limited and not based on clear criteria, etc.
- The NCCEII Secretariat, which is also the National Contact Point, is in dire need of capacity building and recruitment of new staff, including Roma experts, with a view to expanding its composition and mandate. Currently, the entire composition of the Secretariat consists of 4 people, one of whom is a secretary with senior functions. None of the employees of the Secretariat is of Roma origin.

Since 2013 the activities of the National Council for Cooperation on Ethnic and Integration Issues have been boycotted by several Roma organizations¹⁶, which left

¹⁶ 30 Roma organizations complained to Zinaida Zlatanova. Available at: <http://btvnovinite.bg/article/bulgaria/politika/30-romski-organizatsii-se-oplakaha-na-zinaida-zlatanova.html>

the NCCEII in protest on 8 April 2013¹⁷ following the lack of response from the Council in several cases of ethnic murder of entire Roma families and other Roma. The Roma NGOs wanted an institutional change in the NCCEII¹⁸ and boycotted the work until discussion of the proposals. The main motives of the organizations were related to the impossibility to carry out a permanent dialogue with the organizations and to requests for changes in the structure, powers, functions, and composition of the National Council, etc.^{19”20}

The second wave of leaving the National Council by Roma organizations was in 2017, when Mr. Valeri Simeonov was appointed chair of the Council, the person who had called Roma “human-like” from the rostrum of the National Assembly at the end of 2014 and had compared Roma women to “stray bitches”, for which Roma activists have been suing him for hate speech²¹. As stated in the Civil Monitoring Report on the Implementation of the National Roma Integration Strategy 2018, *“Regarding Roma integration, the period 2017–2018 was characterized by a collapse in the legitimacy of the National Roma Contact Point (NRCP) and the consultation process with the civil sector after a representative of the extreme nationalists was elected chairman of the National Council for Cooperation on Ethnic and Integration Issues (NCCEII).”*^{22”}

As a result, most Roma organizations completely boycotted the activities of the National Council. An indicator of this was, for example, the fact that many organizations did not participate in the event dedicated to Roma integration within the Bulgarian Presidency of the Council of the European Union in May 2018, as it was organized by the NCCEII. Another part of the organizations got involved, but sharply criticized the activities of the NCCEII and demanded its deep

institutional reform. The need for such a reform was obvious. Only in this way could the real consultation process with Roma NGOs be restored by the National Contact Point.

The above did not mean a lack of consultation process at the national level. Such a process was actively implemented and led to important positive results within the Committees monitoring the operational programs co-financed by the European Social Fund and the European Regional Development Fund. Within the procedures organized by the respective Managing Authorities, the organizations working for social inclusion of marginalized groups and vulnerable minorities elected their representatives who actively participated in the preparation of the Science and Education for Smart Growth Operational Program and the Human Resources Development Operational Program. Representatives of Roma organizations were included in the Committees monitoring the two operational programs, in the Regions in Growth Operational Program and the Partnership Agreement. The participation in these consultation bodies was active and led to the allocation of significant financial resources for the implementation of the Roma integration policies. It is important to emphasize, however, that this consultation process was carried out because of the activity of the Roma organizations and not due to the implementation of the National Roma Integration Strategy.

The state of the administrative framework for the implementation of the integration policies in the different municipalities and administrative regions has been different. The national strategy did not lead to specific developments in this regard.

An important positive change was the development of regional strategies and municipal plans for Roma integration. The National Roma Integration Strategy of the Republic of Bulgaria required from all municipalities to prepare and adopt municipal annual plans for Roma integration. In the second half of 2012 the National Council for Cooperation on Ethnic and Integration Issues initiated a process of preparation of municipal plans, and the regional administrations were also involved in this effort. They were required to develop Regional Plans for the implementation of the NRIS. Thus, by the end of March 2013 all regional administrations had prepared their strategies for the implementation of the NRIS, and 219 municipalities (out of a total of 264) had prepared and approved municipal plans for Roma integration for 2013–14. The process of preparation of Municipal Plans for Roma Integration for the period 2015–2020 covered 194 municipalities (out of a total of 265). A serious incentive for the municipalities to prepare and adopt by decision of the Municipal Council their Municipal Plans for Roma Integration until 2020 was the requirement of the Human Resources Development and the

17 <http://www.amalipe.com/index.php?nav=news&id=1549&lang=1>

18 Proposal by Roma NGOs for restructuring the National Council for Cooperation on Ethnic and Integration Issues, available at: <http://www.amalipe.com/index.php?nav=news&id=1560&lang=1>

19 Letter to Chairman of the NCEII Ivaylo Kalfin with proposals for the transformation of the NCCEII. Available at: http://integrob.org/wp-content/uploads/2016/02/FINAL_%D0%9F%D1%80%D0%B5%D0%B4%D0%BB%D0%BE%D0%B6%D0%B5%D0%BD%D0%B8%D1%8F_%D0%9D%D0%A1%D0%A1%D0%95%D0%98%D0%92_22.02.pdf

20 Civil monitoring report on the implementation of the National Roma Integration Strategy of the Republic of Bulgaria. Focused on the structural and horizontal preconditions for the successful implementation of the strategy, pp. 15 – 16. Available at: <http://www.amalipe.com/files/publications/2017-C1-Bulgaria-local-electronic.pdf>

21 <https://clubz.bg/59932-valeri-simeonov-osyden-za-jeni-s-instinkti-na-ulichni-kuchki>

22 Civil monitoring report on the implementation of the National Roma Integration Strategy of the Republic of Bulgaria. Focused on the structural and horizontal preconditions for the successful implementation of the strategy, p.8. Available at: <http://www.amalipe.com/files/publications/2017-C1-Bulgaria-local-electronic.pdf>

Science and Education for Smart Growth operational programs for a municipal plan for each municipality applying with a project for Roma integration.

According to the Civil Monitoring Report on the Implementation of the NRIS, *“The quality of most Municipal Plans cannot be assessed very highly. The planned activities in the mass case are without planned funding or rely only on project funding, and the commitment of the municipal budgets is minimal. In many cases the described problems are not followed by activities, there are no indicators, etc. However, the very fact that the municipal councils of 194 municipalities approved municipal plans should be welcomed.”*²³

4.2 FINANCIAL FRAMEWORK

Despite the widespread perception by some media that huge sums have been spent and misused for the Roma, estimates showed that the Roma integration policy was underfunded²⁴. The funds intended for the implementation of the National Roma Integration Strategy were mainly from the operational programs in Bulgaria co-financed by the European Union, the Norwegian Financial Mechanism / EEA Financial Mechanism, and the Swiss contribution.

One of the great successes of the Bulgarian government and the Roma organizations has been the allocation of relatively large financial resources from the operational programs co-financed by the EU for operations aimed at Roma. This started in the previous programming period but has been developing in full force in the current one. Apart from the active advocacy of the Roma organizations in the preparation of the operational programs and in the Monitoring Committees, it is also due to the support of the European Commission as well as the constructive attitude of the Managing Authorities. The inclusion of priority *Socio-economic integration of marginalized communities such as the Roma* in the provisions of the European Social Fund and in the ESF co-financed operational programs was the other key factor: a total of EUR 142 million was earmarked for this thematic objective, targeting two Bulgarian operational programs funded by the ESF, i.e., the HRD OP and SESG OP. In essence, this is the main financial framework for the implementation of the integration policies.

The commitment of the national budget has remained modest and is aimed primarily at covering the expenses for appointing different types of mediators: health, labour, and education. Positive development in the last 3 years has been observed only in the field of education, as the national budget began to provide relatively large sums for the activities of the schools training students from vulnerable groups²⁵. The provision of funds for work with vulnerable groups in schools and kindergartens educating over 20% of the children and students from families with low educational status was the first case in which the state budget was committed to this type of support. This was in connection with the implementation of the commitment to increase teachers' salaries and the funds provided were for salaries and fees. The Ministry of Education and Science recommended that educational mediators be hired with them. The Ministry provides between BGN 24 and 30 million annually. This is not in connection with the implementation of the National Roma Integration Strategy, but pursuant to Article 52a of the Funding Ordinance.

Despite the availability of this financial resource, so far the implementation of the integration policies has not achieved the results expected by both the Roma community and the society as a whole. The Civil Monitoring Report on the Implementation of the NRIS also emphasized that *“Despite the significant focus of the ESF on Roma inclusion in the current programming period, some obstacles at the national level severely limit the ability of Roma-oriented activities to achieve sustainable results:*

- *There is no capacity in the central government institutions to allow for the implementation of a systemic project aimed at Roma integration: “systemic project” is a term used for large projects designed to implement political reform at the state level. They are carried out by the specific beneficiary, i.e., the respective state institution. The lack of a stable institution dealing with Roma integration makes the task impossible.*
- *The capacity of the civil society is not used properly: NGOs are not specific beneficiaries, they are not given access to major projects or international funds, although the EEA Financial Mechanism and the Norwegian Financial Mechanism have proven the effectiveness of such a practice.*
- *The participation of non-governmental organizations (e.g., NGOs) is limited due to the appli-*

²³ Civil monitoring report on the implementation of the National Roma Integration Strategy of the Republic of Bulgaria. Focused on the structural and horizontal preconditions for the successful implementation of the strategy, p.17. Available at: <http://www.amalipe.com/files/publications/2017-C1-Bulgaria-local-electronic.pdf>

²⁴ Kolev, D., T. Krumova, M. Ilieva, and Sp. Petro-va, Civil Assessment of the Implementation of the National Roma Integration Strategy 2012-2014, pp. 49-56. Plovdiv, 2015. Available at: <http://amalipe.com/files/publications/Grajdanska%20ocenka.pdf>

²⁵ Civil monitoring report on the implementation of the National Roma Integration Strategy of the Republic of Bulgaria. Assessment of progress in four key areas of the strategy, p. 54. Available at: <https://amalipe.bg/wp-content/uploads/2020/12/RCM-2018-C1-Bulgaria-PUBLISHEDBG.pdf>

cation of the “state aid” principle²⁶ through an unfavourable payment scheme (small advance payments and delays).

- Due to managerial errors (irregularities) and political errors²⁷, the EU SESG OP payments were suspended due to a pending institutional reform (implementation of an action plan including the designation of a new SESG OP implementation agency). As a result, many measures (including those aimed at Roma integration) have been delayed.
- The administrative burden makes beneficiaries pay more attention to reporting than to actual field work.

The main weaknesses that can be summarized at the local level in the processes of Roma integration are as follows:

- Smaller municipalities (rural municipalities) have a limited capacity of human resources. In most cases in these municipalities there is only one employee who is “assigned the Roma issues”, along with the other administrative responsibilities, functions, and tasks. Very often these employees do not understand and do not know in depth the problems and specifics of the Roma community, which, on the one hand, prevents the municipality from being able to plan and set quality goals, and, on the other hand, to make the most of the various opportunities under the respective programs.
- “Rural municipalities need additional expertise for planning and developing projects aimed at Roma integration through various funds.”²⁸

²⁶ As an example, we can point out that all projects funded by the HRD OP apply a *de minimis* approach, although many of them support non-economic activities.

²⁷ In July 2016, the Minister of Education became the chair of the SESG OP, which led to a violation of the division rule, as the Ministry became both a governing body and a beneficiary and certification body.

²⁸ Civil society monitoring report on implementation of the national Roma integration strategies in Bulgaria. Focusing on structural and horizontal preconditions for successful implementation of the strategy. Available at: <http://www.amalipe.com/files/publications/2017-C1-Bulgaria-local-electronic.pdf>

5

NATIONAL ROMA INTEGRATION STRATEGY IMPLEMENTATION BY PRIORITIES

As mentioned above, the National Strategy set relevant goals and priority activities for most of the six priorities. Unfortunately, many of them have not been transposed into the Action Plan through appropriate measures, activities, and a real budget. Below is an analysis of the implementation of the Rule of Law and Non-Discrimination priority.

On 8 October 2020 the European Parliament voted on a Resolution on the rule of law and fundamental rights in Bulgaria²⁹. The repercussions of this resolution in Bulgaria have been rather separate political interpretations related to the protests and their demands for the resignation of the government and the Prosecutor General. The focus of public media in the country has been on the separation of powers, independence of the judiciary, and the status of the Prosecutor General, and, practically, the fact that the resolution was classified in the EU Charter of Fundamental Rights and EU Values thematic sections of the EP catalogue has remained away from the flow of information. In fact, the preamble to the resolution explicitly begins with the statement of Art. 2 of the Treaty on European Union, which reads *“The Union is founded on the values of respect for human dignity, liberty, democracy, equality, the rule of law and respect for human rights, including the rights of persons belonging to minorities. These values are shared in common with respect to the member states in a society defined by pluralism, non-discrimination, tolerance, justice, solidarity, and equality between women and men.”* The EU’s Charter of Fundamental Rights and the European Convention on Human Rights are cited as further grounds for drafting the resolution. Of course, these are also quite clear signals to the public authorities in Bulgaria that there is a problem in the country with the rights of minorities, tolerance, and discrimination. However, Art. 2 of the resolution explicitly *“emphasizes that it is essential to ensure that the values listed in Article 2 TEU are fully respected and that the fundamental rights set out in the Charter of Fundamental Rights*

are guaranteed; calls on the Bulgarian authorities to ensure full and unconditional respect for these values and rights.” Moreover, in Article 15 of the resolution the EP explicitly *“condemns all cases of hate speech, discrimination, and hostility against Roma, women, LGBTI persons, and persons belonging to other minority groups - an issue that remains a serious concern; calls on the authorities to respond vigorously in cases of hate speech, including by high-ranking politicians, to strengthen legal protection against discrimination and hate crimes, and to effectively investigate and prosecute such crimes”* and *“calls on the Bulgarian authorities and officials to strongly condemn all acts of violence and hate speech against minorities.”* In fact, Art. 16 even cites specific current examples of inadmissible actions and hostility of public authorities against Roma people in the last few years: harassment and forced evictions; educational segregation of Roma children; police operations against Roma neighbourhoods during the pandemic.

It is fair to say that the above-cited texts of the EP Resolution of 8 October are a clear negative assessment of the effectiveness of the public policies in Bulgaria, which concern the Rule of Law and Non-Discrimination priority. The text below discusses the planning, implementation, and results of the measures and activities undertaken in this regard by the public authorities in connection with the National Roma Integration Strategy of the Republic of Bulgaria for 2012–2020 (NRISRB 2020). The purpose of the analysis is to identify specific weaknesses that need to be overcome for Bulgaria to meet its obligations under the Treaty on European Union as well as to respond to the recommendations of the resolution concerning people of Roma origin.

The operational objective of the **Rule of Law and Non-Discrimination** priority in the NSRBIR2020 was formulated as *“Guaranteeing the rights of citizens, with emphasis on women and children, protection of public order, prevention and counteraction to intolerance and hate speech.”* Although the definition is too general and in practice consists of three components, it is clear that to this end there should be measures and activities against hate speech and intolerance

²⁹ https://www.europarl.europa.eu/doceo/document/TA-9-2020-0264_BG.html

(including discrimination as part of the name of the priority). Of course, as is logical to expect in relation to this component of the objective, the NSRBIR 2020 formulated an operational sub-objective No.7, which reads *“Increasing institutional and public sensitivity and intolerance to discrimination and “hate speech”*. Moreover, action against hate speech and hate crimes is also needed under Recommendation No.15 of the European Commission against Racism and Intolerance³⁰, where “hate speech” is defined as “the use of one or more specific forms of expression, and namely the advocacy, encouragement or incitement to slander, hatred or desecration of a person or group of persons, and any harassment, insult, negative stereotyping, stigmatization or threat by such person or persons and any justification for all such forms of expression based on a non-exhaustive list of personal characteristics or status, which includes “race”, colour, language, religion or belief, nationality or national or ethnic origin as well as origin, age, disability, gender, gender identity, and sexual orientation”. However, a reference to the National Action Plan on NSRBIR 2020 as well as to the administrative monitoring reports for the period 2012–2015 showed that this sub-objective of the strategy was not transposed at all in the action plan, and **there were no planned measures, activities or budget as well as no responsible institutions**. In other words, even at the stage of planning measures to prevent and counteract hate speech, the public institutions in Bulgaria failed. In this case, at least three guilty stakeholders can be identified who should have such a focus in their work. First, it is the National Council for Cooperation on Ethnic and Integration Issues (NCCEII), whose secretariat is also the National Contact Point on Roma Integration and should be the main bearer of the political will. Second, the Ministry of Justice is undisputedly responsible for this omission. It is institutionally responsible for the implementation of the European Convention on Human Rights and Fundamental Freedoms³¹ and administers correspondence and discrimination cases brought against Bulgaria in the European Court of Human Rights (ECHR). Last but not least, the Commission for Protection against Discrimination (CPD) is to blame for the lack of preventive measures and activities against ethnically justified discrimination. Pursuant to Art. 6, item 8 of the Rules of Procedure of the CPD as well as in view of the three functions of the commission (i.e., specialized proceedings, analysis, and prevention), it should have established the lack of such measures during the conciliation procedure in 2015 and should have required their inclusion accordingly. The lack of measures against hate speech, given the presence of

three directly interested public institutions, is a sign of **either lack of expertise or a serious lack of political will** and, consequently, of incredibility of the rule of law and non-discrimination priority.

Probably, this is the time to recall that the Convention for the Protection of Human Rights and Fundamental Freedoms (ECHRFF) was ratified by Bulgaria by a law adopted by the National Assembly on 31 July 1992 and entered into force on 7 September 1992. Following the entry into force of Protocol 14 in June 2010 (CETS No. 194), the European Union also became a party to the Convention, and at the same time part of the jurisdiction of the European Court of Human Rights was expanded and redefined. This undoubtedly led to the need to inform public institutions, especially the judiciary, of the amendments to the ECHRFF, as the protection of individual rights and the protection of group rights of minority groups may, in some cases, come into conflict requiring unambiguous solutions and coherence with European legal practices. This need was adequately applied in the action plan through Task 1.1. *Increasing the capacity of the judiciary in the field of protection of human rights and fundamental freedoms*. The trainings within the judiciary were financed under the Norwegian Financial Mechanism and, in fact, the activities under these measures were terminated in 2015 with the end of the respective budget cycle. However, there is no information in the administrative monitoring reports that can be used to assess the impact of the respective trainings, i.e., there is no information on the number of the participants, hours, and curriculum³².

The third component of this task, which was delegated to the Social Assistance Agency, can be mentioned as particularly problematic. The Administrative Monitoring Report from 2016 reported that in 2015 and 2016 trainings on social support of individuals and families were also organized under the Vocational Training Program for employees of the Social Protection and People with Disabilities and Social Services Departments, with the module *“Models for safe behaviour of social workers. Measures for prevention and reduction of crime in vulnerable groups”*, where the curriculum included topics such as models of safe behaviour to prevent crime; avoidance of criminogenic situations - prevention of crime against the person, property, and family; prevention of persons and groups at risk of criminalization (marginalized communities, homeless persons, dependents, etc.). In this case, it should be noted that such training is probably extremely necessary as part of the professional qualification of social workers working on the field in

³⁰ ECRI, General Policy Recommendation No. 15 on combating hate speech, 8 December 2015

³¹ As can be seen on the MP's website here: <https://www.justice.government.bg/home/index/4d98bffd-f40c-412e-883d-15c92562a59a>

³² Public data related to the NFM shows that the project was worth over 1.2 million euros, of which a significant part was spent on laptops and logistics for the seminars. The number of trained magistrates and employees of the justice system was 150.

neighbourhoods with poverty concentration, but it is absolutely unacceptable to take it into account under this measure because it contradicts the philosophy of the specific political goal, i.e. *Increasing the guarantees for effective protection of the rights of Bulgarian citizens in vulnerable social situations, belonging to different ethnic groups*, namely by instilling criminogenicity and crime in the multi-ethnic environment, i.e., victimizing the target group and creating preconditions for the formation and strengthening of prejudices and discriminatory attitudes among SAA employees. In other words, this measure has **counterproductive activity**, which, instead of reducing the preconditions for discrimination, strengthens them.

A similar approach was observed in the implementation of sub-objective *Overcoming cultural barriers in communication and all forms of discriminatory attitudes*. The trainings on working in a "multi-ethnic environment" "according to the standards of rights" were linked in the curricula dealing with "preventive activity of crimes and offenses." In this way, **the non-discrimination measures turned out to promote discrimination**, as they directly ethnicized crime. In practice, the definition ignored the basic terminological understanding of the NSRBIR 2020, which treated the term "Roma" as a *generalization for both Bulgarian citizens in vulnerable socio-economic situations who self-identify as Roma and for citizens in a similar situation, whom the surrounding population defines as Roma regardless of their self-identification*. Overcoming "cultural barriers" in the case of heterogeneous ethno-social communities requires training in diversity management and targeted training related to increasing sensitivity to linguistic and religious differences on the one hand. On the other hand, the "vulnerable socio-economic" situation "regardless of their self-identification" shows that these are communities with a concentration of poverty, unemployment, and low education, i.e., we cannot talk about "ethnoculture", but, at best, about "culture of poverty"³³. In a culture of poverty there should be training for overcoming the learned helplessness (i.e., escape from making lasting decisions about one's own life and high dependence on social benefits), for working with people with low education and illiteracy and, last but not least, it is not important to have training for non-victimization³⁴, i.e. the institutional stereotypes that "it is their own fault" and "everyone is able" should be overcome and the emphasis should

be on the existence of structural inequalities and the lack of civic and institutional culture due to the lack of institutions in the environment and the social networks of individuals at risk. From this point of view, these measures are also ineffective and implausible, as the victimization of vulnerable groups through "criminogenicity" and "crime" is a direct indicator of declarative measures, with no real potential effect on overcoming discriminatory attitudes in police officers.

The third key sub-objective related to hate speech in this priority was *Increasing the capacity of law enforcement authorities to combat crimes and acts of discrimination, violence or hatred based on ethnicity*. Thus defined, the measure seems great, but its inclusion in the action plan sharply reduced the scope and, in practice, reduced it to the repair of the infrastructure in the places of detention and imprisonment, i.e., there was no increase in the capacity of the law enforcement authorities. It is a fact that in the places of imprisonment the persons who self-identify as Roma are overrepresented in the total number of prisoners, reaching about 40%, compared to 5% of the Roma in the total population of the country³⁵. It is also a fact that the annual reports of the Bulgarian Helsinki Committee show that by 2018 and 2019 the standards in prisons and pre-trial detention in terms of living conditions and violence were still not at the required level despite the improvements made in the recent years, i.e. such repairs were needed. But again, it can be said that, on the one hand, these were **inappropriate activities** in the fight against hate crimes and discrimination; and, on the other hand, there was **ethnic stereotyping** of Roma as criminals, which did not help to overcome the negative stereotypes.

Besides the Rule of Law and Non-Discrimination priority, hate speech and hate crimes were generally neglected in the implementation of the Culture and Media priority, where one of the strategic objectives was *Counteracting the manifestations of "hate speech" in the print and electronic media*. Like the case considered at the beginning of the article, in this case there was a lack of transposed measures and activities in the action plan and, accordingly, there was no implementation and no impact. Here, the responsibility for the lack of specific measures, activities, and actions must be explicitly taken by the Prosecutor's Office of the Republic of Bulgaria, as there was a **lack of will for criminal justice**, in conjunction with Art. 162, para. 1 of the Criminal Code: *"Whoever, by word, print or other mass media, electronic information systems or otherwise preaches or incites discrimination, violence or hatred based on race, nationality or ethnicity, shall be punished by imprisonment from one to four years*

³³ The "culture of poverty" concept is linked to the understanding that poverty is not simply a lack of resources in some communities but is linked to the intergenerational transmission of values that hinder the development of children and the community, see Lewis, Oscar (1998). "The culture of poverty". *Society*. 35 (2): 7–9. doi: 10.1007 / BF02838122

³⁴ Coates, L., Richardson, C., & Wade, A. (2006, May). *Reshaping Responses to Victims of Violent Crime*. Presented at Cowichan Bay, B.C., Canada.

³⁵ Bezlov, Tihomir. Roma and crime: police statistics and realities - part 6 // www.Capital.bg, 26.03.2007

and a fine of five thousand to ten thousand leva, as well as public reprimand.”

This lack of will is extremely worrying, as research in recent years has shown that prejudice against the Roma community and other ethnic groups (measured through social distances³⁶) has risen sharply since 2012, and that there has been a marked increase in hate speech both in the media and among the political elite and some magistrates³⁷. In practice, classic cases of racism - considered as dehumanization³⁸ and infra-humanization³⁹ - were not recognized as such by the Bulgarian justice system and, therefore, we have reason to say that in Bulgaria there is **institutional racism** which has severely affected the justice system and, in this regard, it was not accidental that a case was filed against Bulgaria and in particular against Prosecutor General Ivan Geshev at the European Court of Human Rights for racism due to the use of the word “Gypsies” as an insult in public.

The available analyses of the growth of hate speech and, in this context, the lack of any primary, secondary, and tertiary prevention of hate crimes as well as the lack of criminal cases for hate crimes are purely and simply a sign of the lack of expert capacity in Bulgarian magistrates as well as lack of political will in the government and public institutions. To overcome such a lack of capacity, it is necessary to initiate clear changes to the Criminal Code (e.g., through definitions in the additional provisions) that clearly show what racism and incitement to violence and hate speech mean. The working definition of “anti-Roma discrimination” developed by the International Holocaust Remembrance Alliance and adopted on 8 October 2020 can be extremely useful in this regard⁴⁰. The definition contains the following non-exhaustive list of examples of anti-Roma racism, which can be considered in the preparation of new strategic documents and possible changes to the Criminal Code:

- Distortion or denial of persecution of Roma or genocide of Roma;
- Glorification of the genocide of the Roma;
- Incitement, justification, and commitment of violence against Roma communities, their property, and individual Roma;
- Forced and compulsory sterilization as well as other physical and psychological violence against Roma;
- Permanent maintenance and consolidation of discriminatory stereotypes about and against Roma;
- Blaming Roma, through hate speech, for real or perceived social, political, cultural, economic, or healthcare problems;
- Stereotyping Roma as persons involved in criminal behaviour;
- Using the term “Gypsy” as an insult;
- Approving or promoting mechanisms for Roma exclusion because of assumptions based on racial discrimination, such as exclusion from regular schools and institutional procedures, or policies that lead to the segregation of Roma communities;
- Introducing unlawful policies that allow for the arbitrary or discriminatory resettlement of Roma communities and individuals, or creating conditions therefor;
- Imposing collective responsibility on Roma for the actual or perceived actions of individual members of Roma communities;
- Dissemination of hate speech against Roma communities in any form, for example in the media, including the Internet and the social networks.

³⁶ Pamporov, A. (2015), Some specifics in measuring social distances using the Bogardus scale in Bulgaria. In: Knowledge as a value, cognition as a vocation (ed.: Stoilova, R.; K. Petkova, S. Koleva), Sofia: East-West, pp. 383-397; Pamporov, A. (2009) Social Distances and Ethnic Stereotypes about Minorities in Bulgaria. Sofia: Open Society Institute.

³⁷ Pamporov, A. Iliev, G. (2020) Social prejudices and hate speech towards Roma. Civil society monitoring report on implementation of the national Roma integration strategy in Bulgaria, vol. 3, Luxembourg: Publications Office of the European Union, 2020, ISBN 978-92-76-20781-8 doi:10.2838/076494; Ivanova, I. (2018) Public attitudes towards hate speech in Bulgaria in 2018, Sofia, Open Society Institute.

³⁸ Defining Roma as “cattle” by Petar Moskov and Roma women as “stray bitches” by Valeri Simeonov is a typical example of this kind of racism; as well as the term “unhumans” used by Angel Dzhambazki.

³⁹ Defining Roma as “subhumans” and “half-humans” in several speeches and posts by Angel Dzhambazki is an example of this type of racism.

⁴⁰ <http://nccedi.government.bg/bg/node/337>

It can be summarized that the planning of the measures in the Rule of Law and Non-Discrimination priority was scandalous and shows a lack of understanding of the basic principles of the Charter of Fundamental Rights of the European Union and the European Convention on Human Rights related to human dignity, non-discrimination, a fair trial (regarding the presumption of innocence), and especially the right to cultural, linguistic, and religious diversity. Indicative in this respect are the measures for “overcoming cultural barriers”, which were considered through concepts such as “criminogenicity” and “crime”, i.e., instead of setting the direction of non-discrimination, they confirmed and reinforced prejudices with their definition. Indicative of the lack of political will in this regard is the fact that no activities *for Increasing the capacity of law enforcement authorities to combat*

crimes and acts of discrimination, violence or hatred based on ethnicity were included in the action plan at all. Measures related to the media environment must be planned, e.g.:

- Administrative measures related to the Code of Ethics of Bulgarian journalists and the right of individuals to practice this profession for a certain period;
- Penal measures related to the personal responsibility of individual journalists or newsrooms;
- Economic sanctions, e.g., revocation of a license for a certain period, upon finding a targeted editorial policy based on xenophobia and racism.

6

MAIN CONCLUSIONS

The National Roma Integration Strategy of the Republic of Bulgaria was an important step forward, which continued the tradition of drafting good integration documents. Among the important strengths of the National Strategy, the following can be pointed out:

- It was adopted by a decision of the National Assembly. This made the strategy binding on all institutions, including those that were not directly subordinated to the executive branch, i.e., municipalities, the ombudsman, the Commission for Protection against Discrimination, etc.
- Realistic national goals were set for most of the priorities of the strategy.
- A decentralized method of implementation was envisaged through a mandatory requirement for the preparation and adoption by a decision of the respective Municipal Council of Municipal Roma Integration Plans.
- There is an Action Plan for the implementation of the National Strategy.
- An important advantage was the inclusive way of preparing the strategy through the participation of the civil sector and all stakeholders.
- Lack of appropriate indicators and mechanisms for monitoring and evaluating the implementation.
- Weak action plan that only summarizes the activities already carried out by the various ministries, without consistency and without added value.
- 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 prioritization.
- Deepening anti-Roma stereotypes and discrimination is a key obstacle to the implementation of the National Roma Integration Strategy. The Rule of Law and Non-Discrimination priority in the National Strategy contains many gaps and weaknesses, both at the strategic and operational level.

Despite the strengths, the National Roma Integration Strategy contains many weaknesses that do not allow its implementation to lead to real change in the state of the Roma communities. Among the main weaknesses, the following can be pointed out:

- Lack of adequate administrative infrastructure for the implementation of the integration policies.

The above strengths and weaknesses should be considered when developing the new National Strategy of the Republic of Bulgaria for equality, inclusion, and participation of Roma 2021–2030. The Communication from the Commission to the European Parliament and the Council dd. 7 October 2020 - A Union of Equality: EU strategic framework for equality, inclusion, and participation of Roma for 2020–2030 – and its annexes – Guidelines for planning and implementing national Roma strategic frameworks and Portfolio of indicators - provide a wide range of new opportunities for the member states. The Bulgarian Strategic Document for Roma Integration should take advantage of these opportunities, while preserving and expanding the positive aspects of the existing National Roma Integration Strategy and overcoming the many weaknesses that have stopped its implementation over the past decade.

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